2022 Annual Groundwater Monitoring and Corrective Action Report

Nelson Dewey Generating Station Slag Pond Cassville, Wisconsin

Prepared for:

Alliant Energy



SCS ENGINEERS

25222071.00 | January 31, 2023

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OVERVIEW OF CURRENT STATUS

Nelson Dewey Generating Station, Slag Pond 2022 Annual Report

In accordance with $\S257.90(e)(6)$, this section at the beginning of the annual report provides an overview of the current status of groundwater monitoring and corrective action programs for the coal combustion residual (CCR) units. Supporting information is provided in the text of the annual report.

Category	Rule Requirement	Site Status
Monitoring Status – Start of Year	(i) At the start of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in §257.94 or the assessment monitoring program in §257.95;	Detection
Monitoring Status – End of Year	(ii) At the end of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in §257.94 or the assessment monitoring program in §257.95;	Detection
Statistically Significant Increases (SSIs)	 (iii) If it was determined that there was an SSI over background for one or more constituents listed in Appendix III to this part pursuant to §257.94(e): (A) Identify those constituents listed in Appendix III to this part and the names of the monitoring wells associated with such an increase; and 	October 2021 Boron: B-11A, B-11B, B-11R,

Category	Rule Requirement	Site Status
	(B) Provide the date when the assessment monitoring program was initiated for the CCR unit.	Alternative Source Demonstrations prepared for October 2021 and April 2022 events during 2022. Assessment monitoring not required.
Statistically Significant Levels (SSL) Above Groundwater Protection Standard (GPS)	 (iv) If it was determined that there was an SSL above the GPS for one or more constituents listed in appendix IV to this part pursuant to §257.95(g) include all of the following: (A) Identify those constituents listed in appendix IV to this part and the names of the monitoring wells associated with such an increase; (B) Provide the date when the assessment of corrective measures was initiated for the CCR unit; (C) Provide the date when the public meeting was held for the assessment of corrective measures for the CCR unit; and (D) Provide the date when the assessment of corrective measures was completed for the CCR unit. 	Not applicable In detection monitoring
Selection of Remedy	(v) Whether a remedy was selected pursuant to §257.97 during the current annual reporting period, and if so, the date of remedy selection; and	Not applicable In detection monitoring
Corrective Action	(vi) Whether remedial activities were initiated or are ongoing pursuant to §257.98 during the current annual reporting period.	Not applicable In detection monitoring

Table of Contents

Sect	ion	Page
Over	view o	f Current Status
1.0	Intro	duction1
2.0	Back	ground1
	2.1	Geologic and Hydrogeologic Setting1
		2.1.1 Regional Information
		2.1.2 Site Information
	2.2	CCR Monitoring System2
3.0	§ 25	7.90(e) Annual Report Requirements2
	3.1	§ 257.90(e)(1) Site Map
	3.2	§ 257.90(e)(2) Monitoring System Changes3
	3.3	§ 257.90(e)(3) Summary of Sampling Events
	3.4	§ 257.90(e)(4) Monitoring Transition Narrative4
	3.5	§ 257.90(e)(5) Other Requirements
		3.5.1 § 257.90(e) General Requirements
		3.5.2 § 257.94(d) Alternative Detection Monitoring Frequency
		3.5.3 § 257.94(e)(2) Alternative Source Demonstration for Detection Monitoring5
		3.5.4 § 257.95(c) Alternative Assessment Monitoring Frequency6
		3.5.5 § 257.95(d)(3) Assessment Monitoring Results and Standards6
		3.5.6 § 257.95(g)(3)(ii) Alternative Source Demonstration for Assessment Monitoring .6
		3.5.7 § 257.96(a) Extension of Time for Corrective Measures Assessment6
	3.6	257.90(e)(6) Overview6
4.0	Refe	rences6
		Tables
		Tables
Table	1.	Groundwater Monitoring Well Network
Table	2.	CCR Rule Groundwater Samples Summary
Table		Groundwater Elevation Summary
Table		Groundwater Gradients and Average Linear Flow Velocity
Table Table		Groundwater Vertical Gradients Groundwater Analytical Results Summary – April 2022
Table		Groundwater Field Data Summary – April 2022
		G. G. 1 G
		Figures
Figur		Site Location Map
Figur		Aerial View Site Plan and Manitoring Wall Locations
Figur Figur		Site Plan and Monitoring Well Locations Water Table Flow Map – April 2022
Figur		Water Table Flow Map - October 2022
J		p

Appendices

Appendix A	Summary of Regional Geologic and Hydrogeologic Information					
Appendix B	Boring Logs, Well Construction, and Well Development Forms					
Appendix C	Laboratory Analytical Reports					
Appendix D	Historical Monitoring Results					
Appendix E	Alternative Source Demonstration Reports					
	E1 Alternative Source Demonstration, October 2021 Detection Monitoring					
	E2 Alternative Source Demonstration, April 2022 Detection Monitoring					

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1.0 INTRODUCTION

This 2022 Annual Groundwater Monitoring and Corrective Action Report was prepared to support compliance with the groundwater monitoring requirements of the Coal Combustion Residuals (CCR) Rule [40 CFR 257.50-107]. Specifically, this report was prepared to fulfill the requirements of 40 CFR 257.90(e). The applicable sections of the Rule are provided below in *italics*, followed by applicable information relative to the 2022 Annual Groundwater Monitoring and Corrective Action Report for the CCR Unit. The site location is shown on **Figure 1**.

This report covers the period of groundwater monitoring from January 1, 2022, through December 31, 2022.

The groundwater monitoring system for the Nelson Dewey Generating Station (NED) Slag Pond monitors a single CCR unit:

NED Slag Pond (existing surface impoundment – closed January 2018)

The system is designed to detect monitored constituents at the waste boundary of the Slag Pond as required by 40 CFR 257.91(d). The groundwater monitoring system consists of one background well and six downgradient monitoring wells (**Table 1** and **Figure 3**).

During 2017 and early 2018, the Slag Pond CCR unit was closed by leaving the CCR in place and installing a final cover system, in accordance with §257.102(d). Closure certification was completed on January 31, 2018.

The closed CCR landfill adjacent to the Slag Pond is not subject to regulation under the CCR rule, and is regulated by the Wisconsin Department of Natural Resources. The CCR landfill was initially licensed in 1976 and received fly ash from NED until it was closed in phases between 1996 and 2001.

2.0 BACKGROUND

To provide context for the annual report, the following background information is provided in this section of the report, prior to the annual report requirements sections:

- Geologic and hydrogeologic setting
- CCR Rule monitoring system

2.1 GEOLOGIC AND HYDROGEOLOGIC SETTING

2.1.1 Regional Information

The uppermost geologic formation beneath the NED plant that meets the definition of the "uppermost aquifer," as defined by section 257.53 of the CCR Rule, is the surficial alluvial aquifer. The alluvial aquifer consists of Mississippi River valley sand and gravel deposits. This deposit is prevalent along the edges of the entire Mississippi River valley in southwestern Wisconsin. A map of the regional glacial geology in the area is included in **Appendix A**.

The alluvial aquifer is underlain by dolomitic bedrock of the Prairie du Chien Group. A bedrock geology map of the area is provided in **Appendix A**. The dolomite bedrock is also an aquifer and is likely hydraulically connected to the alluvial aquifer above.

Regionally, groundwater flow is generally to the southwest and discharges to the Mississippi River.

2.1.2 Site Information

Soil boring logs for monitoring wells installed at the site also generally indicate sand and gravel soils within the monitored depths. During drilling of CCR well B-7R, the unconsolidated materials were identified as consisting primarily of poorly graded, medium to coarse grained sand, and silty sand. The boring log for the previously installed background monitoring well B-26 shows silt and poorly graded sand as the primary unconsolidated materials at this location. The boring logs for the CCR monitoring wells are provided in **Appendix B**. All CCR monitoring wells are screened within the unconsolidated glacial aguifer.

The groundwater flow direction in the vicinity of the plant is generally southwest toward the Mississippi River. Historically, infiltration at the former Slag Pond, former fly ash basin, and the former Wisconsin Pollutant Discharge Elimination System (WPDES) ponds caused groundwater mounding to be present around these features; however, these ponds have now all been closed and are no longer sources of infiltration.

Although historic site water level measurements have generally indicated that groundwater flow is toward the Mississippi River, groundwater flow in the Slag Pond area is influenced by variations in river water levels. During periods of high river water levels, the flow temporarily reverses and the river discharges to the shallow sand and gravel aquifer. The water table map for the April 2022 monitoring event (**Figure 4**) shows groundwater flow to the southwest toward the river, with localized flow to the east near the closed CCR landfill area. The water table map for the October 2022 monitoring event (**Figure 5**) shows flow to the south and southwest toward the river. The groundwater elevations for the CCR monitoring wells and additional wells in the state monitoring program for the closed CCR landfill are provided in **Table 3**. Calculated horizontal gradients and flow velocities for flow to the west and south in April 2022 and to the south in October 2022 are provided in **Table 4A**. Vertical gradients are provided in **Table 4B**.

2.2 CCR MONITORING SYSTEM

The groundwater monitoring system established in accordance with the CCR Rule consists of one upgradient (background) monitoring well and six downgradient monitoring wells (**Table 1** and **Figure 3**). The background well is B-26. The downgradient wells include B-7R, B-11A, B-11B, B-11R, B-31A, and B-31R. The CCR Rule wells are installed within the surficial alluvium aquifer. Well depths range from approximately 23 to 114 feet, measured from the top of the well casing.

3.0 § 257.90(E) ANNUAL REPORT REQUIREMENTS

Annual groundwater monitoring and corrective action report. For existing CCR landfills and existing CCR surface impoundments, no later than January 31, 2018, and annually thereafter, the owner or operator must prepare an annual groundwater monitoring and corrective action report. For new CCR landfills, new CCR surface impoundments, and all lateral expansions of CCR units, the owner or operator must prepare the initial annual groundwater monitoring and corrective action report no later than January 31 of the year following the calendar year a groundwater monitoring system has been established for such CCR unit as required by this subpart, and annually thereafter. For the

preceding calendar year, the annual report must document the status of the groundwater monitoring and corrective action program for the CCR unit, summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and project key activities for the upcoming year. For purposes of this section, the owner or operator has prepared the annual report when the report is placed in the facility's operating record as required by $\S257.105(h)(1)$. At a minimum, the annual groundwater monitoring and corrective action report must contain the following information, to the extent available:

3.1 § 257.90(E)(1) SITE MAP

A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit;

A map showing the site location is provided on **Figure 1**. A map showing site features is provided on **Figure 2**. A map showing the CCR unit and all background (or upgradient) and downgradient monitoring wells with identification numbers for the groundwater monitoring program is provided on **Figure 3**. The Slag Pond CCR unit is closed, and the map shows the post-closure conditions.

3.2 § 257.90(E)(2) MONITORING SYSTEM CHANGES

Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;

No new monitoring wells were installed and no wells were decommissioned as part of the groundwater monitoring program for the CCR unit in 2022.

3.3 § 257.90(E)(3) SUMMARY OF SAMPLING EVENTS

In addition to all the monitoring data obtained under §§ 257.90 through 257.98, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs;

Two groundwater sampling events were completed in 2022 at the NED Slag Pond as part of ongoing detection monitoring.

Groundwater samples collected during the semiannual events, in April and October 2022, were analyzed for the Appendix III constituents. A summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring program is included in **Table 2**.

The validation and evaluation of the April 2022 monitoring event data was completed and transmitted to WPL on August 1, 2022. The validation and evaluation of the October 2022 monitoring event data was in progress at the end of 2022 and will be transmitted to WPL in 2023; therefore, the October 2022 monitoring results will be included in the 2023 annual report. The October 2022 groundwater elevation data is included in this report.

The sampling results for Appendix III parameters in April 2022 are summarized in **Table 5**. Field parameter results for the April 2022 sampling events are provided in **Table 6**. The analytical

laboratory report for April 2022 are provided in **Appendix C**. Historical results for each monitoring well through April 2022 are summarized in **Appendix D**.

3.4 § 257.90(E)(4) MONITORING TRANSITION NARRATIVE

A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels);

There was no monitoring program transition in 2022. The NED Slag Pond remained in the detection monitoring program.

In 2022, the monitoring results for the October 2021 and April 2022 monitoring events were evaluated for statistically significant increases (SSIs) in detection monitoring parameters relative to background. The comparison to background was based on a prediction limit approach, comparing the results to interwell upper prediction limits (UPLs) based on background monitoring results from the upgradient well (B-26). The interwell UPLs were most recently updated in January 2021 using background data collected through October 2020. The January 2021 Statistical Analysis was included as an Appendix in the 2021 Annual Groundwater Monitoring Report. The Unified Guidance for Statistical Analysis of Groundwater Monitoring Data at Resource Conservation and Recovery Act (RCRA) Facilities (U.S. EPA, 2009; Section 5.3.1) recommends periodic updating of background for both intrawell and interwell analyses. For semiannual monitoring, an update interval of 2 to 3 years is recommended; therefore, the next UPL update is planned for 2023 or 2024.

For the October 2021 and April 2022 events, SSIs were identified at one or more wells for boron, calcium, field pH, sulfate, and total dissolved solids (TDS) (**Table 5**).

Alternative source demonstrations were completed in 2022 for SSIs identified in the October 2021 and April 2022 events, demonstrating that sources other than the Slag Pond were the likely cause of the observed SSIs. The Alternative Source Demonstration (ASD) reports are provided in **Appendix E**.

3.5 § 257.90(E)(5) OTHER REQUIREMENTS

Other information required to be included in the annual report as specified in §§ 257.90 through 257.98.

Additional potentially applicable requirements for the annual report, and the location of the requirement within the Rule, are provided in the following sections. For each cited section of the Rule, the portion referencing the annual report requirement is provided below in italics, followed by applicable information relative to the 2022 Annual Groundwater Monitoring and Corrective Action Report for the NED Slag Pond CCR unit.

3.5.1 § 257.90(e) General Requirements

For the preceding calendar year, the annual report must document the status of the groundwater monitoring and corrective action program for the CCR unit, summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and project key activities for the upcoming year.

Status of Groundwater Monitoring and Corrective Action Program. The groundwater monitoring and corrective action program was in detection monitoring throughout 2022.

Summary of Key Actions Completed.

- Two semiannual groundwater sampling and analysis events (April and October 2022).
- Statistical evaluation and determination of SSIs for the October 2021 and April 2022 monitoring events.
- ASD reports for the SSIs identified from the October 2021 and April 2022 monitoring events.

Description of Any Problems Encountered. During the October 2022 monitoring event, compliance well B-7R did not have sufficient groundwater for sample collection. B-7R is a shallow well located close to the Mississippi River, and the low water level within the well is attributed to the low river level in the late summer and fall of 2022. The groundwater elevation measured at B-7R in October 2022 is the lowest observed since the well was installed in 2009, and this well was able to be sampled during all previous monitoring events except in October 2021, when water levels in the Mississippi River were also low.

Discussion of Actions to Resolve the Problems. This well will be sampled again in April 2023.

Projection of Key Activities for the Upcoming Year (2023).

- Two semiannual groundwater sampling and analysis events (April and October 2023).
- Statistical evaluation and determination of any SSIs for the October 2022 and April 2023 monitoring events.
- If an SSI is determined, then within 90 days either:
 - Complete ASD (if applicable), or
 - Establish an assessment monitoring program.

3.5.2 § 257.94(d) Alternative Detection Monitoring Frequency

The owner or operator must include the demonstration providing the basis for the alternative monitoring frequency and the certification by a qualified professional engineer in the annual groundwater monitoring and corrective action report required by § 257.90(e).

Not applicable. No alternative detection monitoring frequency has been proposed.

3.5.3 § 257.94(e)(2) Alternative Source Demonstration for Detection Monitoring

The owner or operator must also include the demonstration in the annual groundwater monitoring and corrective action report required by § 257.90(e), in addition to the certification by a qualified professional engineer.

The ASD reports prepared to address the SSIs observed for the October 2021 and April 2022 sampling events are provided in **Appendix E**. The ASD reports are certified by a qualified professional engineer.

3.5.4 § 257.95(c) Alternative Assessment Monitoring Frequency

The owner or operator must include the demonstration providing the basis for the alternative monitoring frequency and the certification by a qualified professional engineer in the annual groundwater monitoring and corrective action report required by § 257.90(e).

Not applicable. Assessment monitoring has not been initiated.

3.5.5 § 257.95(d)(3) Assessment Monitoring Results and Standards

Include the recorded concentrations required by paragraph (d)(1) of this section, identify the background concentrations established under § 257.94(b), and identify the groundwater protection standards established under paragraph (d)(2) of this section in the annual groundwater monitoring and corrective action report required by § 257.90(e).

Not applicable. Assessment monitoring has not been initiated.

3.5.6 § 257.95(g)(3)(ii) Alternative Source Demonstration for Assessment Monitoring

The owner or operator must also include the demonstration in the annual groundwater monitoring and corrective action report required by § 257.90(e), in addition to the certification by a qualified professional engineer.

Not applicable. Assessment monitoring has not been initiated.

3.5.7 § 257.96(a) Extension of Time for Corrective Measures Assessment

The assessment of corrective measures must be completed within 90 days, unless the owner or operator demonstrates the need for additional time to complete the assessment of corrective measure due to site-specific conditions or circumstances. The owner or operator must obtain a certification from a qualified professional engineer attesting that the demonstration is accurate. The 90-day deadline to complete the assessment of corrective measures may be extended for longer than 60 days. The owner or operator must also include the demonstration in the annual groundwater monitoring and corrective action report required by § 257.90(e), in addition to the certification by a qualified professional engineer.

Not applicable. Corrective measures assessment has not been initiated.

3.6 257.90(E)(6) OVERVIEW

A section at the beginning of the annual report that provides an overview of the current status of groundwater monitoring and corrective action programs for the CCR unit.

The specific requirements for the overview under §257.90(e)(6) are listed and the information is provided at the beginning of this report, before the Table of Contents.

4.0 REFERENCES

U.S. Environmental Protection Agency (U.S. EPA), 2009, Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance, EPA 530-R-09-007, March 2009.

Tables

- 1 Groundwater Monitoring Well Network
- 2 CCR Rule Groundwater Samples Summary
- 3 Groundwater Elevation Summary
- 4A Groundwater Gradients and Average Linear Flow Velocity
- 4B Groundwater Vertical Gradients
- 5 Groundwater Analytical Results Summary April 2022
- 6 April 2022 Groundwater Field Data Summary

Table 1. Groundwater Monitoring Well Network
Nelson Dewey Closed Ash Disposal Facility
SCS Engineers Project #25222071.00

Monitoring Well	Location in Monitoring Network	Role in Monitoring Network
B-26	Upgradient / Sidegradient	Background
B-7R	Downgradient	Compliance
B-11R	Downgradient	Compliance
B-11A	Downgradient	Compliance
B-11B	Downgradient	Compliance
B-31R	Downgradient	Compliance
B-31A	Downgradient	Compliance

 Created by:
 RM
 Date:
 12/14/2020

 Last revision by:
 NDK
 Date:
 9/26/2022

 Checked by:
 RM
 Date:
 12/21/2022

Table 2. CCR Rule Groundwater Samples Summary Nelson Dewey Closed Ash Disposal Facility / SCS Engineers Project #25222071.00

Sample Dates		Upgradient Well					
	B-7R ⁽¹⁾	B-11R	B-11A	B-11B	B-31R	B-31A	B-26
4/25-26/2022	D	D	D	D	D	D	D
10/18/2022		D	D	D	D	D	D
Total Samples	1	2	2	2	2	2	2

Abbreviations:

D = Required by Detection Monitoring Program

-- = No Sample

Notes:

(1) Insufficient amount of water for sampling at B-7R during October 2022 sampling event.

 Created by:
 ACW
 Date:
 11/12/2019

 Last revision by:
 RM
 Date:
 12/22/2022

 Checked by:
 ACW
 Date:
 12/28/2022

Table 3. Groundwater Elevation Summary Nelson Dewey Closed Ash Disposal Facility / SCS Engineers Project #25222071.00

	Ground Water Elevation in feet above mean sea level (amsl)																										
Well Number	B-7R	B-8R	B-11R	B-11A	B-11B	B-21R	B-26	B-26A	B-28	B-30R	B-30AR	B-31R	B-31A	B-32	B-32A	B-35	B-35A	B-36	B-36A	B-37	B-37A	B-39	MW-301	MW-302	MW-303	Barge Gauge (SG-12)^^	Pond Gauge (SG-13)
Top of Casing Elevation (feet amsl)	623.35	627.51	622.62	622.12	621.89	623.31	626.40	626.40	616.81	621.81	622.4	622.42	622.69	614.18	614.4	620.78	621.09	621.11	621.33	614.85	614.85	626.48	619.09	619.21	618.49	622.34	See notes
Screen Length (ff)	10	10	10	5	5	10	10	5	10	10	5	10	5	10	5	10	5	9	4.5	10	5	10	10	10	10		
Total Depth (ft from top of casing)	23.05	27.25	24.15	52.00	113.90	22.78	31.67	45.78	16.70	22.20	46.90	22.82	35.52	14.79	52.00	16.60	47.00			19.95	48.20	26.90	21.11	21.27	20.15		
Top of Well Screen Elevation (ft)	610.30	610.26	608.47	575.12	512.99	610.53	604.73	585.62	610.11	609.61	580.50	609.60	592.17	609.39	567.40	614.18	579.20	609.60	575.50	604.90	571.65	609.58	607.98	607.94	608.34		
Measurement Date																										-	
October 5-6, 2011	604.94	606.29	604.57	604.36	604.32	604.43	604.52	604.55	604.61	604.37	605.21	608.37	604.42	604.88	604.82	604.87	604.81			604.37	604.39						
April 25-26, 2012	606.58	606.30	606.07	606.30	606.28		605.89	605.91				608.65	606.31	604.33		606.29	#REF!			606.16	606.17	606.17					
October 17, 2012	604.39	604.16	604.10	603.98	603.98	604.08	604.12	604.14	604.31	603.97	603.98	607.32	604.07	604.33	604.35		#REF!			603.93	603.93	603.93					
April 2, 2013	607.04	608.01	606.15	607.20	607.17	606.30	605.60	605.64	605.90	605.91	605.93	607.13	607.13	606.11	606.14	606.13	606.25			606.99	607.02						
October 16-17, 2013	604.51	605.89	604.17	603.90	603.87	604.11	604.31	604.32	604.36	604.08	604.06	604.87	604.00	604.53	604.56	604.46	604.44			604.05	604.04						-
April 10, 2014	607.42	608.97	607.45	607.28	607.26	-	607.22	607.23	-			607.37	607.28			607.46	607.39			607.25	607.26						
October 14-15, 2014	605.67	606.82	605.17	604.90	604.91	614.92	605.00	605.01	605.13	604.92	604.92	606.36	605.54	605.41	605.45	605.36	605.33			604.94	604.99						
April 16, 2015	607.26	608.50	607.11	607.15	607.05	-	606.40	606.41	-			607.37	607.09			606.73	606.78			606.99	606.88						-
October 1-2, 2015	605.14	604.66	604.53	604.42	604.38	604.36	604.43	604.50	604.54	604.34	604.32	605.13	604.38	604.76	604.82	604.76	604.75			604.30	604.39						
December 8, 2015	606.69		606.71	606.30	606.26		606.80		-			607.40	606.39									607.54					
April 12, 2016	609.32	609.36	609.32	608.71	608.68	-	609.81	609.72				609.34	609.01			609.73	609.65			608.79	608.79	610.23					
July 18-19, 2016	606.54		606.14	606.76	606.74	-	606.09					606.55	606.73									606.28					
October 19-20, 2016	608.59	608.46	608.35	608.21	608.19	608.37	608.84	608,76	608.63	608.45	608.46	608.51	608.20	608.69	608.73	608,78	608.74			608.20	608.18	609.09					
January 11-12, 2017	608.02		607.96	607.83	607.78		608.56					607.90	607.84									608.92					
April 17, 2017	609.08	608.82	608.34	609.05	608.99	NM	608.59	608.54	609.94	608.57	608.64	607.20	608.98	608.96	608.98	609.00	609.02			609.02	609.02	610.23					
June 8, 2017	610.74		610.42	609.81	610.08	-	611.25					609.63	610.50									611.53					
August 1-2, 2017	607.02		606.73	605.57	605.50		607.39					606.84	605.69									608.71					
October 9-10, 2017	606.93	606.51	606.25	607.01	606.94	-	606.22	606.13	606.33	606.44	606.45	606.68	606.93	606.57	606.61	606.65	606.71									-	
October 19, 2017	609.60		609.42	609.58	609.65	-	608.84					609.47	609.43							609.40	609.40	608.55					
November 17, 2017						606.35																					
December 19, 2017						604.81																				-	
February 7, 2018	605.37		605.33	604.96	604.92	-			616.81			605,31	605.01									606.19	605.08	605.05	605.00		
March 16, 2018						-																	604.64	604.6	604.56		
April 203, 2018 **	604.82	606.61	606.27	606.63	606.55	606.52	606.49	606.37	606.39	606.46	606.43	604.44	606.46	606.58	606.66	606.68	606.70			606.77	606.83	606.19					
May 23, 2018						-																	610.68	610.78	610.61	-	
October 8-10, 2018	610.76	610.68	610.67	610.28	610.24	610.02	610.34	610.28	610.83	610.09	610.05	610.39	610.27	611.05	610.94	610.72	610.54					611.44				-	
November 11, 2018					609.14	-						609.11														608.40	
April 22-23, 2019	615.28	615.66	615.28	615.29	615.28	614.98	615.49	615.31	615.40	615.36	615.35	615.01	615.33			615.87	615.98			-		615.40				615.17	<615.06
October 14-16, 2019	613.43	613.11	613.06	613.29	613.18	612.47	613.10	613.10	612.71	612.83	612.78	612.50	613.20	613.10	613.00	613.10	613.15					613.35				612.33	<615.06
April 13-14, 2020	614.12	613.76	614.39	613.88	613.86	613.22	613.76	613.73	613.68	613.60	613.56	613.80	613.79			614.04	614.00					613.71				612.89	613.10
October 12-13, 2020	605.09	604.88	604.57	604.54	604.44	604.28	604.92	604.83	604.86	604.72	604.72	604.66	604.54	605.07	605.06	605.00	605.08					605.06				603.89	DRY
April 19-21, 2021	608.83	608.66	608.57	608.72	608.67	607.93	608.55	608.49	608.27	608.38	608.35	608.66	608.63	608.68	608.74	608.86	608.85	608.40	608.39	608.74	608.75	608.48				608.15	<609.00
October 6-8, 2021	604.05	604.04	603.85	603.79	603.74	603.56	604.21	604.13	604.11	604.00	603.97	603.98	603.84	604.32	604.38	604.35	604.34	603.93	603.92	NM	NM	604.23				602.90	<609.00
April 25-26, 2022	609.84	610.25	609.75	610.00	609.98	609.70	610.12	610.08	609.99	610.11	610.09	610.27	609.95	610.26	610.40	610.44	610.32	609.94	609.90	AB	AB	610.22				NM	609.25
October 18-19, 2022	603.81	603.82	603.59	603.63	603.57	603.39	603.99	603.81	603.84	603.78	603.77	603.69	603.61	604.07	604.09	604.12	604.05	603.64	603.65	AB	AB	603.91				601.29	<609.00
Bottom of Well Elevation (ft)	600.30	600.26	598 47	570.12	507.99	600.53	594.73	580.62	600.11	599.61	575.50	599.60	587.17	599.39	562.40	604.18	574.20	600.6	571	594.90	566.65	599.58	597.98	597.94	598.34		

Notes:
-- = not measured

-- = not intersured

**The PVC casing at 8-35A was cut down on June 28, 2018 to allow the protective cover to close. Groundwater elevations prior to 6/28/18 are calculated using the old top of casing (FOC) elevation of 621.20 ft ams).

**The PVC casing at 8-35A was cut down on June 28, 2018 to allowing well rehabilitation. The well was resurveyed on April 22, 2019, The old top of casing elevation was 621.03 ft. The new TOC elevation is 623.31 ft.

**One pond staff gauge was installed on April 22, 2019, The base of the gauge (0 reading) is at 615.056 ft ams). Two additional gauges were installed on March 24, 2020. These gauge bases are at 609° and 612° ams).

**ANSG-12 reestablished in 2022 following barge sig construction work. Previous elevation (applies to measurements before October 2022) was 616.60. New elevation (top of metal pipe) is 622.34*

 Created by:
 MDB

 Last revision by:
 DK

 Checked by:
 NDK
 Date: 4/1/2013 Date: 10/24/2022 Date: 10/24/2022

Table 4A. Horizontal Gradients and Flow Velocity Nelson Dewey Generating Station SCS Engineers Project #25222071.00 2022

	Flowpath A - West							
Sampling Dates	h1 (ft)	h2 (ft)	ΔI (ft)	Δh/Δl (ft/ft)	V (ff/d)			
April 25-26, 2022	610.00	609.75	154.98	0.0016	0.03			

		Flowpath B - South								
Sampling Dates	h1 (ft)	h2 (ft)	ΔI (ft)	Δh/Δl (ft/ft)	V (ff/d)					
April 25-26, 2022	610.25	610.00	399.00	0.0006	0.01					
October 18-19, 2022	603.91	603.59	582.00	0.0005	0.01					

Wells	K Values (cm/sec)	K Values (ft/d)
Geometric		
Mean	2.9E-03	8.2

Assumed Porosity, n

Note: K value derived from averaging previous slug tests

Groundwater flow velocity equation: $V = [K^*(\Delta h/\Delta I)] / n$

ft = feet ft/d = feet per day

K = hydraulic conductivity

n = effective porosity

V = groundwater flow velocity

h1, h2 = point interpreted groundwater

elevation at locations 1 and 2

 ΔI = distance between location 1 and 2

 $\Delta h/\Delta I$ = hydraulic gradient

 Created by:
 NDK
 Date:
 9/26/2022

 Last revision by:
 RM
 Date:
 12/27/2022

 Checked by:
 ACW
 Date:
 12/28/2022

Table 4B. Summary of Calculated Vertical Hydraulic Gradients Nelson Dewey Generating Station SCS Engineers Project #25222071.00 2022

Date	B-11A/B-11B	B-31R/B-31A
April 25-26, 2022	-0.0002	-0.016
October 18-19, 2022	-0.0006	-0.006

Notes:

A positive vertical gradient indicates upward flow potential, and a negative vertical gradient indicates downward flow potential.

Created by:	NDK	Date: 9/26/2022
Last revision by:	RM	Date: 12/23/2022
Checked by:	ACW	Date: 12/28/2022

\\Mad-fs01\data\Projects\25222071.00\Deliverables\2022 NED Fed CCR Annual Report\Tables\[Table 4B - Vertical_Gradients_

Table 5. Groundwater Analytical Results Summary - 2022 Nelson Dewey Closed Ash Disposal Facility, Cassville, WI / SCS Engineers Project #25222071.00

		Background Well	Compliance Wells								
		B-26	B-7R	B-11A	B-11B	B-11R	B-31A	B-31R			
Parameter Name	UPL	4/25/2022	4/26/2022	4/26/2022	4/26/2022	4/26/2022	4/26/2022	4/25/2022			
Appendix III											
Boron, ug/L	72.3	52.5	98.1	88.6	2,590	2,330	198	454			
Calcium, ug/L	108,000	75,900	59,200	51,600	97,100	114,000	55,300	81,100			
Chloride, mg/L	77.6	45.3	12.0	58.3	36.5	18.0	56.0	36.0			
Fluoride, mg/L	0.2	<0.48 D3, M0	<0.48 D3	<0.095	<0.48	<0.48 D3	0.22 J	<0.095			
Field pH, Std. Units	7.71	7.19	6.43	7.53	7.63	7.01	7.82	6.77			
Sulfate, mg/L	44.0	34.2	3.7 J, D3	8.5	513	58.1	15.4	60.0			
Total Dissolved Solids, mg/L	553	470	318	350	1,000	560	316	428			

Blue shaded cell indicates the compliance well result exceeds the UPL (background) and the Limit of Quantitation (LOQ).

Abbreviations:

UPL = Upper Prediction Limit SSI = Statistically Significant Increase

LOD = Limit of Detection

LOQ = Limit of Quantitation ug/L = micrograms per liter mg/L = milligrams per liter

DQ = Double Quantification

Lab Notes:

J = Estimated concentration at or above the LOD and below the LOQ.

D3 = Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

M0 = Matrix Spike recovery and/or matric spike duplicate recovery was outside laboratory control limits.

Notes:

- 1. An individual result above the UPL may not constitute an SSI above background. See the accompanying report text for identification of statistically significant results.
- 2. Interwell UPLs calculated based on results from background well B-26. UPLs are based on a 1-of-2 retesting approach.
- 3. Interwell UPLs were updated in January 2021 with background well results from December 2015 through October 2020.

Created by: LMH Date: 9/26/2022 Last revision by: RM Date: 12/20/2022 Checked by: ACW Date: 12/28/2022 Proj Mgr QA/QC: TK Date: 1/17/2023

Table 6. 2022 Groundwater Field Data Summary Nelson Dewey Closed Ash Disposal Facility / SCS Engineers Project #25222071.00

Well	Sample Date	Groundwater Elevation (feet)	Field Temperature (deg C)	Field pH (Std. Units)	Field Specific Conductance (umhos/cm)	Oxygen, Dissolved (mg/L)	Field Oxidation Potential (mV)	Turbidity (NTU)
B-7R	4/26/2022	609.84	8.5	6.43	614.1	0.82	-86.1	3.56
B-11A	4/26/2022	610.00	13.0	7.53	633.7	0.15	0.3	0.00
B-11B	4/26/2022	609.98	13.0	7.63	1,432	0.22	45.4	0.00
B-11R	4/26/2022	609.75	10.4	7.01	934	0.07	-41.5	6.70
B-26	4/25/2022	610.12	11.0	7.19	826	10.44	252.4	0.30
B-31A	4/26/2022	609.95	13.2	7.82	556	0.17	59.6	0.00
B-31R	4/25/2022	610.27	11.3	6.77	728	0.38	-25.3	3.68

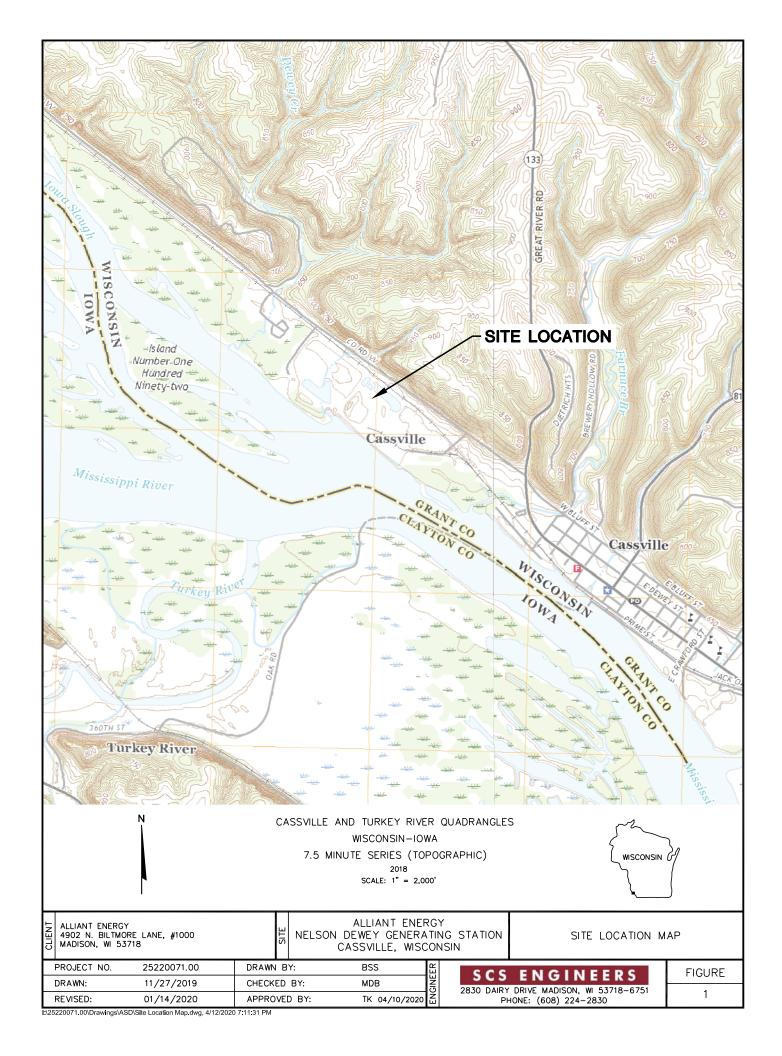
 Created by:
 NDK
 Date:
 9/26/2022

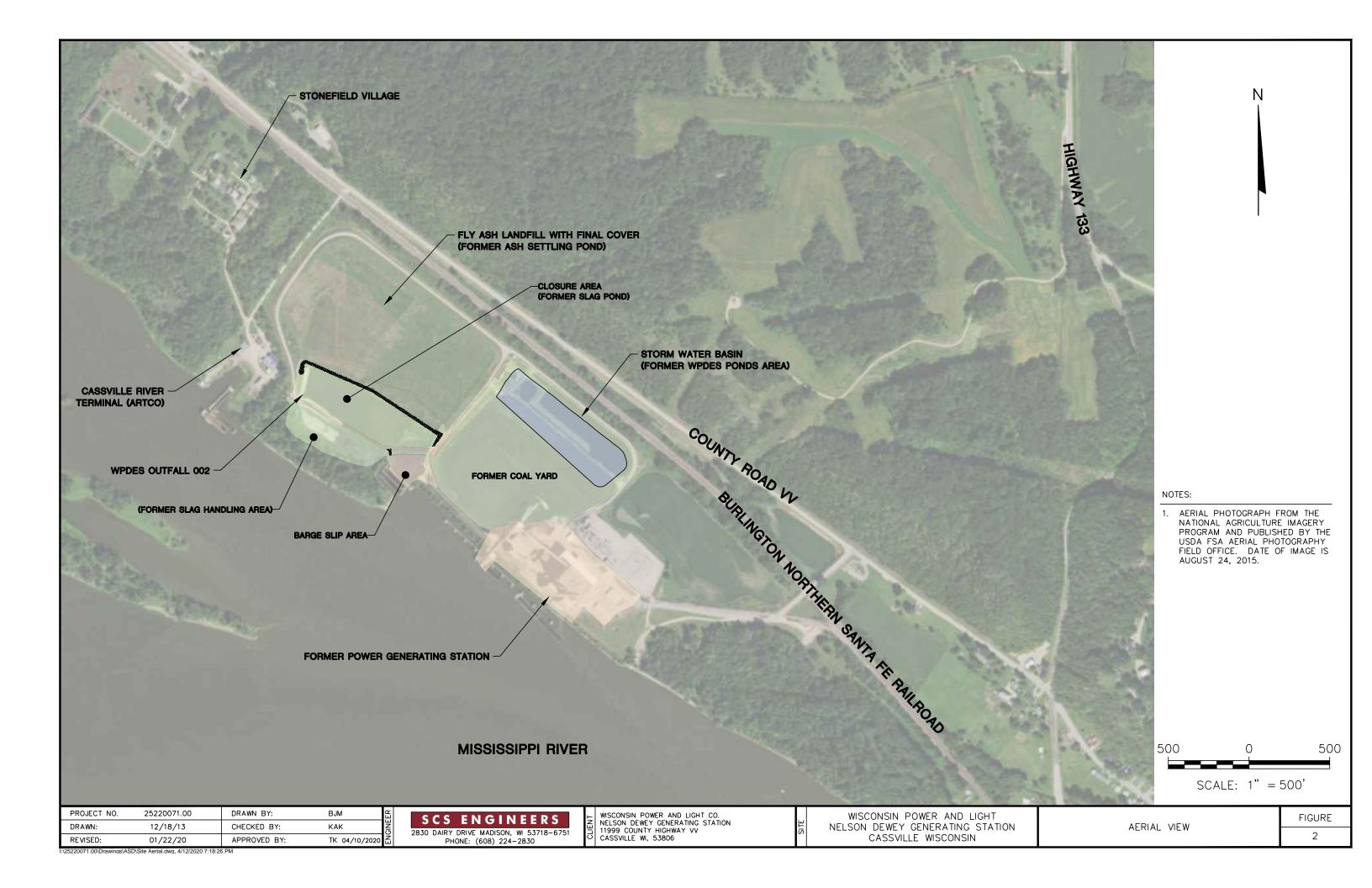
 Last revision by:
 DK
 Date:
 12/7/2022

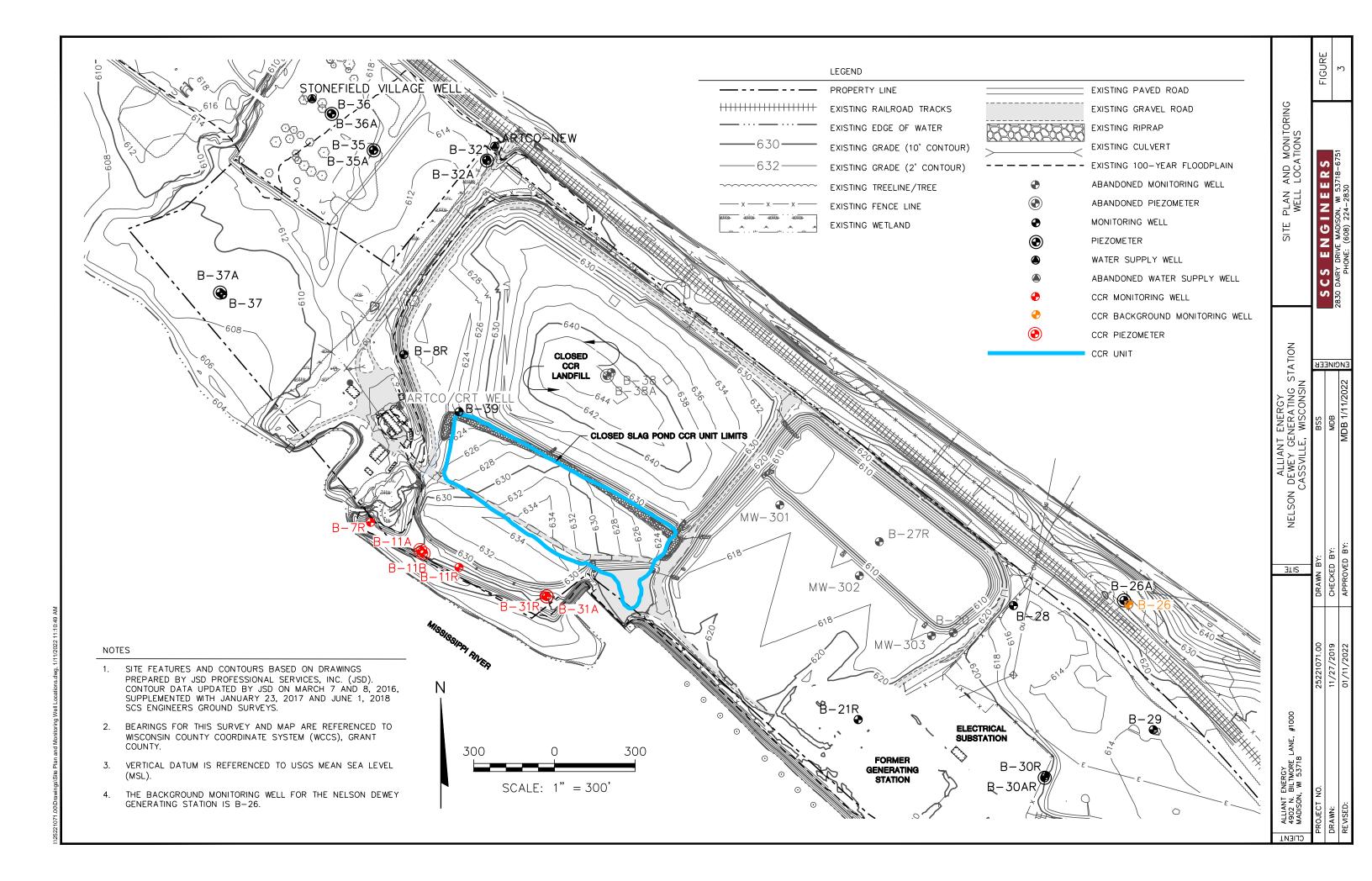
 Checked by:
 ACW
 Date:
 12/28/2022

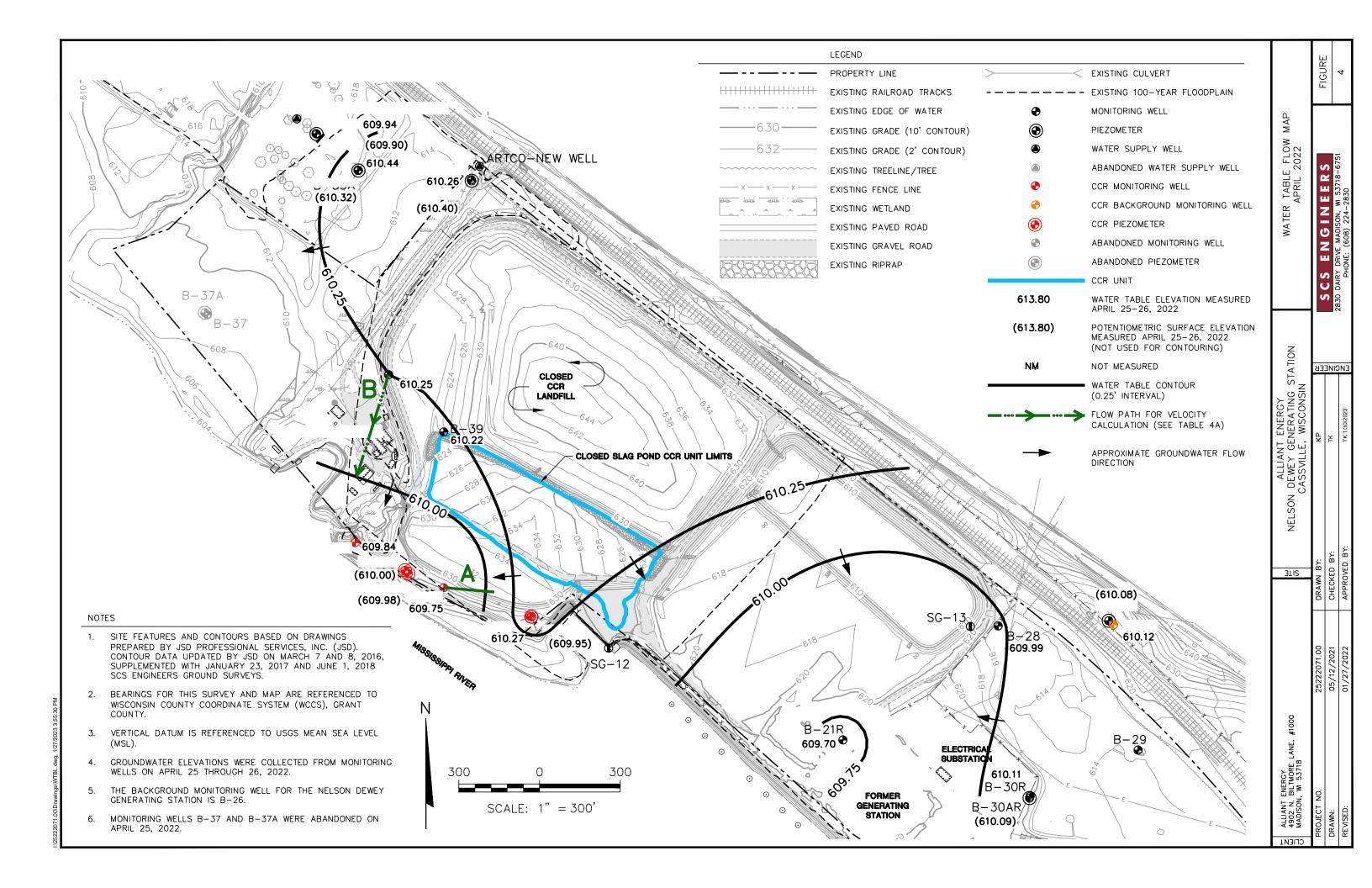
Figures

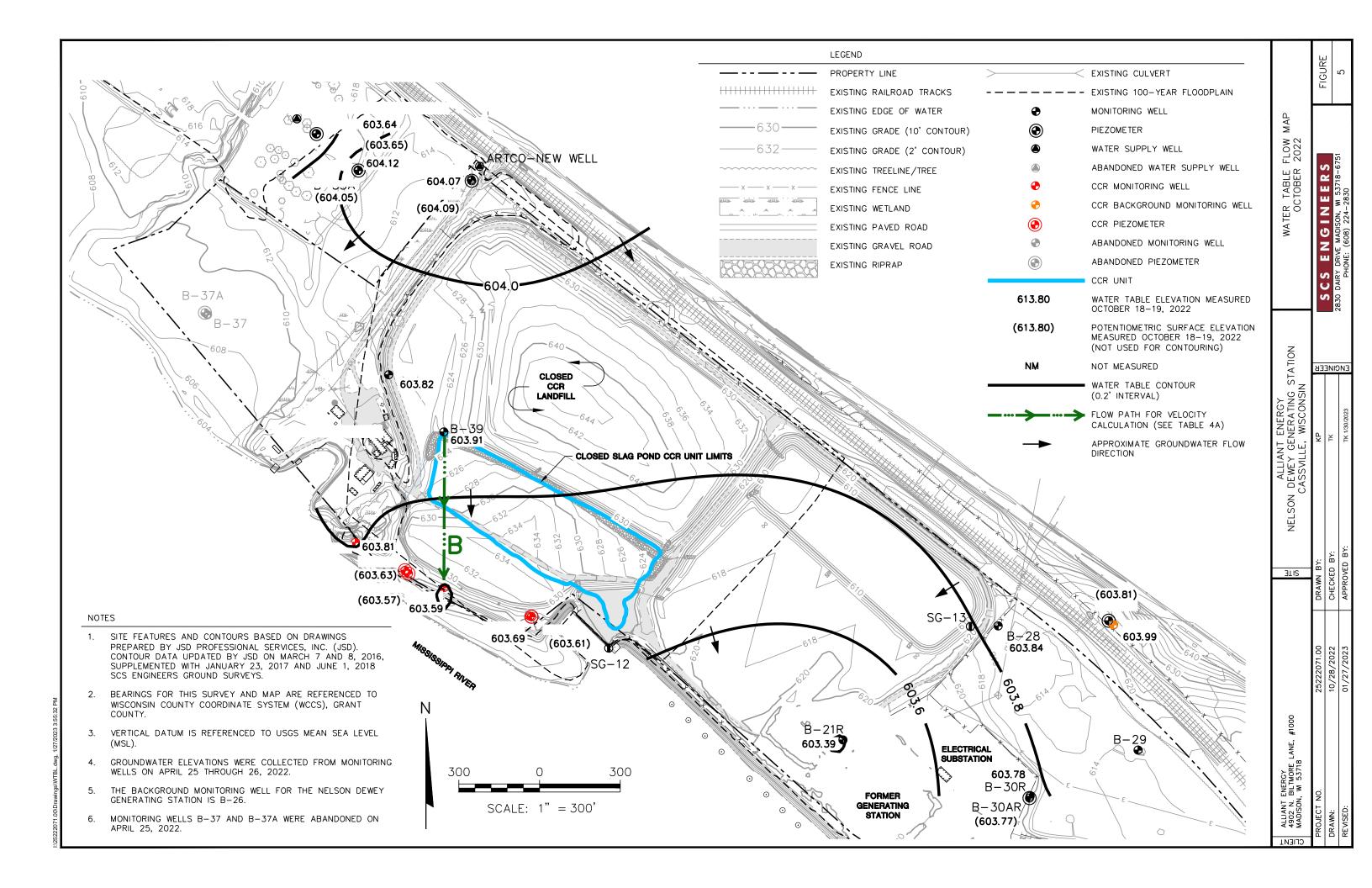
- 1 Site Location Map
- 2 Aerial View
- 3 Site Plan and Monitoring Well Locations
- 4 Water Table Flow Map April 2022
- 5 Water Table Flow Map October 2022











Appendix A Summary of Regional Geologic and Hydrogeologic Information

Regional Glacial Geology

Alluvial

- Alluvium. Primarily sand or slightly gravelly sand on modern valley bottoms; most deposited during the last part of the Holocene; overlain by thin peat and thin silty overbank sediment in many places.
- Alluvial sediment of the Elderon-phase terrace. Sand or gravelly sand, at least a few meters thick up to 15 m thick, deposited by streams carrying meltwater from the margins of the Laurentide Ice Sheet during the Elderon phase of the late Wisconsin glaciation. Occurs as terraces formed during subsequent down-cutting during the latest Wisconsin and Holocene.
- Alluvial sediment of the Savanna terrace. Sand or gravelly sand, at least a few meters thick up to a 15 m thick, deposited by streams carrying meltwater from the margins of the Laurentide Ice Sheet during the late Wisconsin glaciation. Occurs as the Savanna terrace formed during subsequent down-cutting during the latest Wisconsin and Holocene.
 - Alluvial sediment of the Bridgeport terrace. Sand or gravelly sand, at least a few meters thick up to 15 m thick, deposited by streams carrying meltwater from the margins of the Laurentide Ice Sheet during the late Wisconsin glaciation. Occurs as remnants of the Bridgeport terrace; the terrace surface is likely largely underlain by a bedrock strath.
- af

 Alluvial fan. Moderately to well-sorted cobbles, gravel, pebbles, and fine sediment forming fan-shaped deposits on valley floors.

 Typically forms at the base of steep slopes and particularly at the mouths of steep tributaries.

Colluvial

- Coarse-grained colluvium. Unsorted slope sediment, derived from erosion of Paleozoic bedrock and windblown silt from upland surfaces moving downslope due to gravity. Typically associated with bedrock incision by major streams, and occurring on relatively steep slopes adjacent to major stream systems and deposits.
- Landslide. Poorly sorted gravel, boulder, and blocky debris.
 Forms chaotic, hummocky lobes on valley floors and at bases of slopes; may have associated scarps on adjacent upslope surfaces.

Windblown

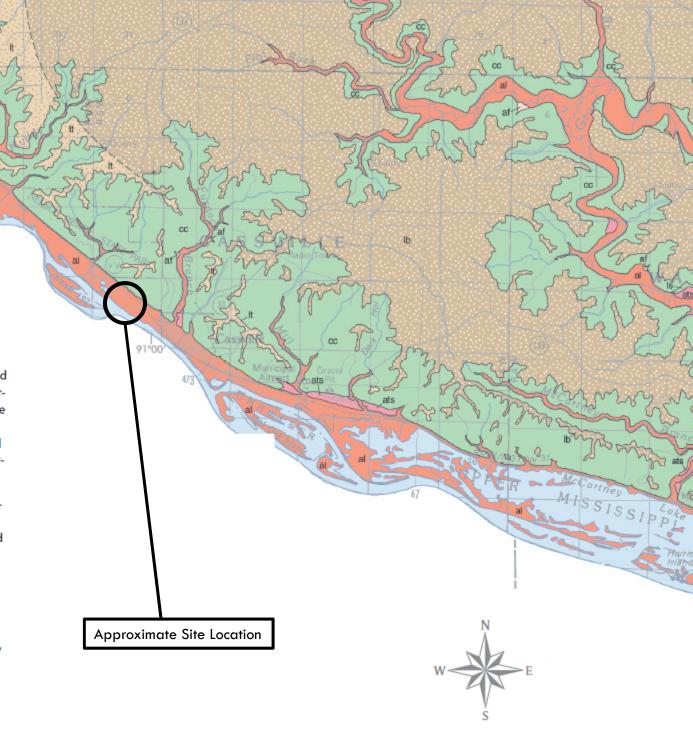
Loess on Paleozoic bedrock. Windblown silt, more than 1.5 m thick; generally thickest in western areas (as much as 15 m) and thinning toward the east. Noncalcareous, unbedded, and massive; shows evidence of soil formation. Primarily composed of the Peoria, Roxana, and Loveland Members of the Keiler Formation. Roxana Member commonly contains abundant spruce fragments and charcoal. Although distribution is patchy and uncertain due to the thickness of the loess, heavily weathered residual clay of the Rountree Formation, derived from underlying Paleozoic bedrock, is common at the base.

Loess on till. Windblown silt, typically more than 5 m thick. Noncalcareous, unbedded, and massive, shows evidence of soil formation. Primarily composed of the Peoria, Roxana, and Loveland Members of the Keiler Formation. Roxana Member commonly contains abundant spruce fragments and charcoal. Deposited on patchy, discontinuous pre-Illinoian till; occurrence confined to western Grant County, which was the easternmost extent of pre-Illinoian ice flowing from Minnesota and Iowa.

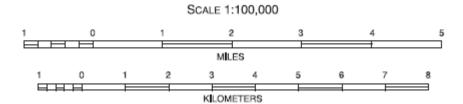
Windblown sand. More than about 1.5 m thick; dunes generally no more than a few meters high.

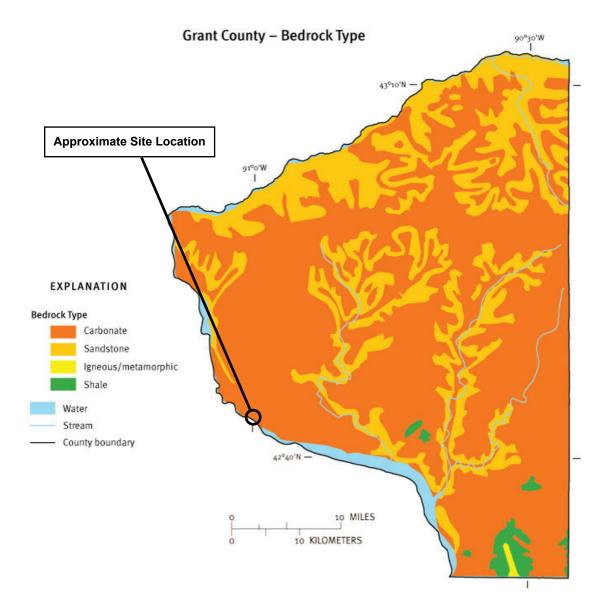
Symbols

Geologic contact. Position shown on map is judged to be generally within 0.2 km of actual position. Dashed where approximate.



Source: Carson, Eric C., Preliminary Quaternary Geology of Grant County, Wisconsin, Wisconsin Geological and Natural History Survey Open File Report 2012-06.



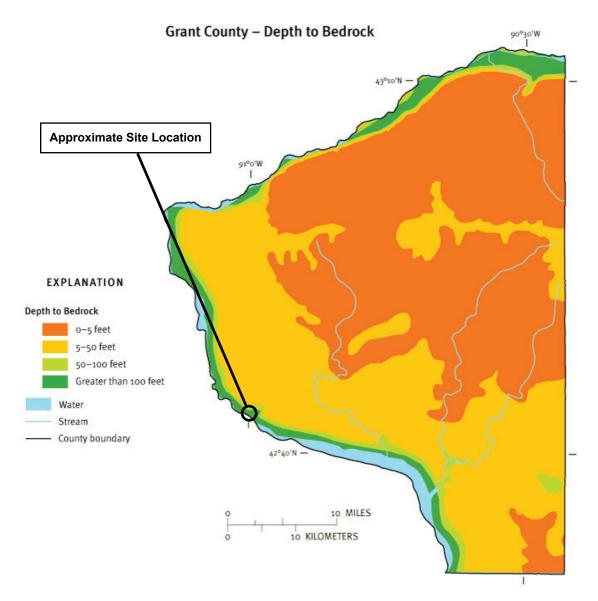


This resource characteristic map was derived from generalized statewide information at small scales, and cannot be used for any site-specific purposes.

Map source: Schmidt, R.R., 1987, Groundwater contamination susceptibility map and evaluation: Wisconsin Department of Natural Resources, Wisconsin's Groundwater Management Plan Report 5, PUBL-WR-177-87, 27 p.

Figure created for the "Protecting Wisconsin's Groundwater Through Comprehensive Planning" web site, 2007, http://wi.water.usgs.gov/gwcomp/

When bedrock is less than 50 feet from the land surface and the water table occurs in the bedrock, the type of bedrock is important in determining how easily a contaminant can reach the groundwater. Bedrock types that allow water to pass quickly through them will offer less protection from contaminants. In Wisconsin, these types of bedrock are typically limestone and dolomite which are highly fractured. Igneous and metamorphic rocks (e.g. granite) and sandstone are less fractured and offer some protection from infiltrating water which may contain contaminants. On the other hand, shale bedrock is almost impermeable, and doesn't allow water and accompanying contaminants to pass through it as easily. The bedrock categories used for this project are carbonates, sandstone, igneous/metamorphic/volcanic, and shale.



This resource characteristic map was derived from generalized statewide information at small scales, and cannot be used for any site-specific purposes.

Map source: Schmidt, R.R., 1987, Groundwater contamination susceptibility map and evaluation: Wisconsin Department of Natural Resources, Wisconsin's Groundwater Management Plan Report 5, PUBL-WR-177-87, 27 p.

Figure created for the "Protecting Wisconsin's Groundwater Through Comprehensive Planning" web site, 2007, http://wi.water.usgs.gov/gwcomp/

The depth to bedrock indicates the amount of soil and surficial deposits that exist in an area and, therefore how important the type of bedrock is in evaluating pollution potential. Information on the depth to bedrock map is used to determine the relative weight given to the other resource characteristic maps. For example, where the bedrock surface is deep and the water table occurs above the bedrock, the type of bedrock is not considered in determining groundwater contamination susceptibility. Where the depth to bedrock is shallow (less than 50 feet below the land surface), the water table is likely to occur in the bedrock. In that case, the type of bedrock is considered because it could influence a contaminant's ability to reach the groundwater. This map identifies areas where the depth to bedrock is 0-5 feet (in at least 35% of the area), 5-50 feet, 50-100 feet and greater than 100 feet.

Appendix B Boring Logs, Well Construction, and Well Development Forms

	Watershed/Wastewater	Waste Managemen	MONITORING WELL CONSTRUCTION Form 4400-113A Rev. 7-98
Facility/Project Name	Remediation/Redevelopment	Other	have see a v
WPL- Nelson Dewey Generating St.	Local Grid Location of Well × 479422.6 ft.	N. 737324.8 ft. WE.	Well Name B-39
Facility License, Permit or Monitoring No.	***	S. <u>137324.0 jt.</u> W.	(30)
racinty License, Permit or Monitoring No.	Local Grid Origin (estimat		Wis. Unique Well No. DNR Well ID No.
FI 111. VYS	Lat L	ong or	
Facility ID	St. Plane ft. N,	ft. E. S/C/N	Date Well Installed
	Section Location of Waste/Sour	rce —	m m d d v v v v
Type of Well	SE _{1/4 of NW 1/4 of Sec}		Well Installed By: Name (first, last) and Firm
	Location of Well Relative to W		Dave Cruise- Badger State Drilling
Distance from Waste/ Enf. Stds.	u Upgradient s	Sidegradient	Kula Kaasaa 200 Faasiaaaa
Sourceft. Apply	 	Not Known ————	Kyle Kramer- SCS Engineers
	6 _ 65 ft. MSL ———	1. Cap and lock?	Yes No
B. Well casing, top elevation 62	26 48 ft, MSL	2. Protective cover	-
Di visita di		a. Inside diameter	
C. Land surface elevation	23 _58 ft. MSL	b. Length:	_ <u>_</u> 4 ft.
D. Surface seal, bottom623 _08 ft. MS	0.5 ft	c. Material:	Steel × 04
	# 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		Other
12. USCS classification of soil near screen		d. Additional pro	tection? Yes No
	W SP X	If yes, describe	e:Bollards
	T CH CH		Bentonite X 30
Bedrock 🗆	188	3. Surface seal:	Concrete 01
13. Sieve analysis performed?	Yes No	В \ В	entonite Other
14. Drilling method used: Rot	ary 🗍 5 0	10000	well casing and protective pipe:
Hollow Stem Au	7 - 1		Bentonite 30
	ther	#5 Filte	er Sand - Ohio Other
		859	
15. Drilling fluid used: Water 0 2	Air 01	5. Annular space sea	
D. 1111 N. 1	Ione 99	ICC)	and weight Bentonite-sand slurry 35
			nud weight Bentonite slurry 2 3 1
16. Drilling additives used?	čes ⊠No		ite Bentonite-cement grout 50
		eF1 *	volume added for any of the above
Describe		f. How installed:	The second secon
17. Source of water (attach analysis, if requ	ired):		Tremie pumped 0 2
111 John V Oz 11 and Canada analysis, il loqu	100).		Gravity 💢 08
		6. Bentonite seal:	a. Bentonite granules 3 3
000.00	0.5	b.	3/8 in. 1/2 in. Bentonite chips / 3 2
E. Bentonite seal, top623.08 ft, MS	_ or <u>0.5</u> ft.	🛭 / с	Other
612.50	40	X 7 F:	L 14 6
F. Fine sand, top ft. MS]	L or 10 ft.	KOX / .	l: Manufacturer, product name & mesh size
044.50		a	#7 Fine Sand - Ohio
G. Filter pack, top611.58 ft. MSI	or 12 ft.	b. Volume added	_{ft} 3
			al: Manufacturer, product name & mesh size
H. Screen joint, top609.58 ft. MSI	_ or 14 ft.		#5 Filter Sand - Ohio
	17	b. Volume added	
I. Well bottom 599.58 ft. MSI	_ or 24 ft.	9. Well casing:	Flush threaded PVC schedule 40 X 23
			Flush threaded PVC schedule 80 2 4
J. Filter pack, bottom _ 596.58 ft. MSI	or27 ft.		
- 150 S 100 C 100 MINISTER NO.		10.5	Other
K. Borehole, bottom ft. MSI	or 27 ft.	10. Screen material:	
K. Bolehole, Boltom	701 101	a. Screen type:	Factory cut X 11
L. Borehole, diameter 8.5 in.		3 (Continuous slot 0 1
L. Borehole, diameter in.		\	Other O
2.4		b. Manufacturer	
M. O.D. well casing $-\frac{2.4}{}$ in.		c. Slot size:	0. <u>10</u> in.
2.04		d. Slotted length:	
N. I.D. well casing in.		11. Backfill material (
			Coarse - Ohio Other
I hereby certify that the information on this I	orm is true and correct to the bes	st of my knowledge.	
Signature 17/12 01	· Firm		
The Themen	SCS ENG	INEERS, 2830 Dairy Drive,	Madison, WI 53718-6751

Please complete both Forms 4400-113A and 4400-113B and return them to the appropriate DNR office and bureau. Completion of these reports is required by chs. 160, 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stats., and ch. NR 141, Wis. Adm. Code. In accordance with chs. 281, 289, 291, 292, 293, 295, and 299, Wis. Stats., failure to file these forms may result in a forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on these forms is not intended to be used for any other purpose. NOTE: See the instructions for more information, including where the completed forms should be sent.

State of Wisconsin SOIL BORING LOG INFORMATION Department of Natural Resources Form 4400-122 Rev. 7-98 Watershed/Wastewater Waste Management Route To: Remediation/Redevelopment Other 1 of 2 Page Facility/Project Name **Boring Number** License/Permit/Monitoring Number B-39 WPL- Nelson Dewey Generating Station SCS#: 25215135.30 Boring Drilled By: Name of crew chief (first, last) and Firm Date Drilling Started Date Drilling Completed Drilling Method Dave Cruise hollow stem **Badger State Drilling** 10/20/2015 10/20/2015 auger DNR Well ID No. WI Unique Well No. Common Well Name Final Static Water Level Surface Elevation Borehole Diameter Feet 623.58 Feet 8.5 in. Local Grid Origin Local Grid Location (estimated:) or Boring Location Lat 479,423 N, 737,325 E State Plane S/C/N \square E \square N Feet W NW 1/4 of NW 1/4 of Section 19, т 3 N, R 5 W Feet \square S Long Civil Town/City/ or Village Facility ID County Code County Grant 22 Cassville Soil Properties Sample Penetration (tsf) Recovered (in) Soil/Rock Description 8 Depth In Feet Blow Counts Length Att. And Geologic Origin For Moisture Diagram Plasticity PID/FID Graphic Content Pocket Each Major Unit SC Liquid P 200 Limit Well TOPSOIL, with medium grained sand, light brown. POORLY GRADED SLAG, coarse grained, very dark brown (10YR 2/2), fly ash. 2 20 25 29 33 . 3 SI M .5 FILL 6 14 32 44 31 S2 21 M 8

I hereby certify that the information on this form is true and correct to the best of my knowledge.

| Signature | Firm | SCS Engineers | Tel: (608) 224-2830 | 2830 Dairy Drive Madison, WI 53711 | Fax:

SP

POORLY GRADED SAND, fine grained, dark gray

M

M

10

12

13

14

(10YR4/1).

12 10 15 8

10

18

S3

This form is authorized by Chapters 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stats. Completion of this form is mandatory. Failure to file this form may result in forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on this form is not intended to be be used for any other purpose. NOTE: See instructions for more information, including where the completed form should be sent.

Form 4400-122A

Borin	g Numb	oer	B-3	9 Use only as an attachment to Form 4400-1	22.							ge 2	of	2
San	nple									Soil	Prope	rties		
	& in)	S	ಕ	Soil/Rock Description					(tsf)					
. 9	Att.	ount	ı Fe	And Geologic Origin For					ion	ပ		y		nts
nber Typ	gth,	× C	Depth In Feet	Each Major Unit	SCS	phic	1 gran	PID/FID	ket	stur	it	ticit x	00)/ ime
S Number and Type	Length Att. & Recovered (in)	Blow Counts	Dep		S O	Graphic Log	Well Diagram	PID	Pocket Penetration (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	RQD/ Comments
S5	15	4 5 5 6	-							M				
		5 0	- 16											
			E 10	POORLY GRADED SAND, fine grained, dark gray (10YR 4/1).										
S6	16	3 4 4 6	_17	(10113.4/1).	SP					S				Saturation @
		4 6	E											16.5ft bgs
F			18											
			E -19											
S7	22	4.6	- 19	POORLY GRADED GRAVEL WITH SAND, pebble size gravel, dark gray (10YR 4/1).		60°]							
5/	22	4 6 8 11	E_20	Size graver, dark gray (10 f K 4/1).	GP					S				
			Ē			60°C]							
H			-21	POORLY GRADED SAND, coarse grained, dark gray		100								
		7.4	E 22	(10YR 4/1).										
S8	14	7 4 4 5	22							S				
L			E -23											
			Ē											
S9	6	4 7 8 10	-24		SP					S				
		8 10	Ē											
			25											
S10	14	4 3	<u>-</u> 26							S				
510	14	4 3 4 21	E 20	Trace pebbles						3				
			-27	EOB @ 27' bgs.		<u> </u>								
				LOD @ 27 0gs.										

State of Wisconsin Department of Natural Resources

SOIL BORING LOG INFORMATION

Form 4400-122

Rev. 7-98

			Ro	oute To:		astewater Redevelopment		aste Ma	_	ement	\boxtimes								
						reduction philam	Page 1 of 2									2			
Facili	ty/Proje	ct Nan	ne				License/Permit/Monitoring Number Boring Number									4			
					erating Station			2525									07R		
	s Imho		Name o	t crew ch	nief (first, last) at	nd Firm	Date	Drilli	ng S	tarted		D	ate Drill	ing Co	mpleted	ļ.	Dril	ling Method	
	yne Ch		isen, C	Co.				4	4/28	3/2009)			4/28/	2009		R	otosonic	
WIU	nique W			DNR V	Well ID No.	Common Well Name	Final			iter Lev	el	Surfa	ce Eleva			В		Diameter	
Local	Grid Or	J600		timatad.	156	B-07R ing Location		F	eet]	MSL			620.5	Feet I			6.0	inches	
	Plane	igni			, 1,695,529			Lat .		0	1		Locary	ond Lo		J		□ Е	
NW		of N	W 1	/4 of Sec	ction 19,	T 3 N, R 5 W		Long .		0	9	'n			ı 🗆 s			Feet W	
Facili	ty ID 201453				County		County	y Code	9			ity/ or	Village						
	nple	0			Grant		22		_	Cass	ville	_		O.:1	Duna				
Sai	1				Soil/Re	ock Description							Soil Propertie				S		
	tt. & d (in	ınts	Feet			ologic Origin For							ive					o o	
ber Type	th A	Ş	H H			h Major Unit			CS	hic	am	Д	gth	in fig	- u	city		nent	
Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet					1	O S O	Graphic Log	Well Diagram	PID/FID	Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	RQD/ Comments	
1	60			WEL	L GRADEI	D SAND WITH S	SILT		_	THE			1007	20	нн	H I	- н	H 0	
CS	42		ldish																
			- 1	at 4.5	feet.	noist, some siltier	layers		3										
			=						3										
			-2 -							精料									
			-3							Hi									
			-																
			E-4																
			-																
			_5																
2 CS	60 48			Same	as above.					HH									
			-6					sw	-SM										
1								7.00											
			-7																
			-8								32 SS								
			_9	Cilter		1 C O 4 O	F C4		ŀ										
				Sitty	organic sand	layer from 9 to 9.	o ieet.				8 8								
3	60		-10	Same	an above ao	lor change to 7.5	ZD 4/1		ĺ										
3 CS	60		-			wet above clay.	I K 4/ I		1	排出									
			-11			Ž			ŀ	W.					i		i		
										国村									
			-12								8 ⊢ 8								
I hereb	y certify	that t	he infor	mation or	n this form is tru	e and correct to the be	st of my	y knov	vledg	ge.									
Signat	A 1	2	11 0	len,	10		IT, Inc		., .									508-831-4444	
	1000	4	rei	er/	100	1 744	Heartla	nd Tra	il M	ladison	, WI 53	717					Fax: 6	508-831-3334	

This form is authorized by Chapters 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stats. Completion of this form is mandatory. Failure to file this form may result in forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on this form is not intended to be be used for any other purpose. NOTE: See instructions for more information, including where the completed form should be sent.

SOIL BORING LOG INFORMATION SUPPLEMENT Form 4400-122A

Borin	g Numb	ег	B-0'	7R Use only as an attachment to Form 4400	-122.		41						2 of	2
Sar	nple				1					Soi	1 Pro	pertie	5	
	s (ii)	.53	t l	Soil/Rock Description	1				စ္					
, ø	Att.	Blow Counts	Depth In Feet	And Geologic Origin For			=	0	essiv h	ا و _		<u>₹</u>		RQD/ Comments
nber Typ	gth	× C	H H	Each Major Unit	USCS	Graphic Log	II grar	PID/FID	npre	Moisture Content	Liquid	Plasticity	8	Q. WILL
Number and Type	Length Att. & Recovered (in)	Blo	Dep		n s	Gra	Well Diagram	II	Compressive Strength	ಕ್ತೆ ತ	j.	Plastic Frdex	P 200	δχ <u>ο</u>
			12		SW-SN	周問								
			-13		B 44-21									
			- 14											
			-14	LEAN CLAY WITH SAND (CL), fine sand, plastic, 7.5YR 3/1 very dark gray,	CL									
			-15	no odor, wet.	LCL									
4 CS	60 60		- 13	WELL GRADED SAND WITH SILT		国语								
CS	00		- 16	AND CLAY (SW-SM), trace gravel, very low plasticity, 5YR 4/3 reddish		HI								
8			F 10	brown, no odor, wet.		H								
			-17	brown, no oder, wet.		開稿						1		
			= 17		SW-SI	H								
			-18		111-51							1		
			F 10											
			- 19			line.								
			F											
			E_20	~		100							1	
				End of boring at 20.0 feet.									İ	
												1		
	8		ŀ		ŀ									
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60/2						ŀ							1	
. 8/2														
3.GDT														
ONRO														
WI														
/.GPJ														
8026W														
98 03														
SBL														
WDNR_SBL_98 03026W.GPJ WI_DNR98,GDT 8/27/09				*										
×	I	l	Ţ	I.	1		Į.	Į.	Į.	Į.	l,	I		1

	State of Wisconsin Department of Natural Resources								
	Route To:		astewater 🗆	Waste Ma	magement 🛛	MONITORING WELL	CONSTI	RUC	TION
	Facility/Project Name	Remediation/I	Redevelopment	Other _		Form 4400-113A	Rev. 7-	98	
•	WPL - Nelson Dewey Generating Station	Local Grid Local	ation of well		□ E.	Well Name			
*	Facility License, Permit or Monitoring No.	Local Grid Oric	in S. —	d: D) or V	□ E. □ W. Well Location ⊠	B-0	7R		
	02525	Lat		a	wen Location 🔀	Wis. Unique Well No.			aber
*	Facility ID					VU600 Date Well Installed	1	56	
_	122014530	St. Plane20	n of Waste/Source	1,095,529	_ ft. E. S/C/N	200000000000000000000000000000000000000	***		
	Type of Well	NONDERSON STREET		10	. QE	Well Installed By: (Pers	2009 on's Name	and	Firm)
$\tilde{\epsilon}$	Well Code 11/mw	Location of Wa	I Relative to Waste	19 , T. 3	- IN, R W			tara .	I miny
	Distance from Waste/ Source Enf. Stds. Apply	u Upgrad		Sidegradient	Gov. Lot Number	Wes In	morr		
-	350 ft. PP3	d ⊠ Downgi	radient n 🗆			Layne Christ	ensen, Co.		
	A. Protective pipe, top elevation 62	23.50 ft. MSL			1. Cap and lock?	L	⊠ Ye	======================================	No
_	B. Well casing, top elevation 62	23.35 ft. MSL			2. Protective cover pi				200
	C. Land surface elevation6	520.5 ft. MSL			a. Inside diameter:b. Length:		7		4.0 in. 5.0 ft.
**			- 61		c. Material:		Stan		0.4
	D. Surface seal, bottom 618.5 ft. MSL	or <u>2.0</u> ft.	22/22/2	16-216-216	or iviatorial.		Other		CC 755
-	12. USCS classification of soil near screen:		THE THE THE	- Excent on	d. Additional prote	ction?	□ Ye		
-		V⊠ SP □	/11	1 /	If yes, describe:			_	
	SM ⊠ SC □ ML □ MH □ CI Bedrock □	CH □		 \ \.	3. Surface seal:		Bentonite	: X	3 0
	13. Sieve analysis attached?	s ⊠No	₩	` ∖ `	. Sarrave sour.		Concrete	-	20
-10	44 55 1111	y 🗆 5 0		₩			Other	. 🗆	23
	Hollow Stem Auge			₩ 4	. Material between v	vell casing and protective		-	
-		r 🛛 🔼		55 16 66	Upper Filter	Sand/Lower Bentonite	Bentonite Other	_	1.35% m in 5
-	15. Drilling fluid used: Water ⊠ 0 2 Ai	- 5301		5	. Annular space seal:	a. Granular/Chipped	Bentonite		3 3
_	Drilling Mud 03 None	т 🗆 0 1		₩ 1	oLbs/gal mu	id weight Bentonite-	sand slurry		3 5
	11011			₩ '	cLbs/gal mu	nd weight Bento			
	16. Drilling additives used? ☐ Yes	s ⊠ No		*	d% Bentonit		ment grout		5 0
erq.		Ü		₩ '	f. How installed:	olume added for any of th		_	0.1
	Describe				i. How instance.	Trem	Tremie ie pumped		
'Man	17. Source of water (attach analysis, if required)	:		₩		11011	Gravity		
	on-site hydrant		₩	8 6	Bentonite seal:	a. Bentonie			
				₩ /	b. □ 1/4 in. ⊠ 3/		onite chips		
_]	E. Bentonite seal, top 618.5 ft. MSL o	r ft		₩ /	c		_ Other		1241
4 1	F. Fine sand, top612.6 ft. MSL or	r		∅ / / ^{7.}	Fine sand material:	Manufacturer, product na		h siz	æ
	T. I me saile, top	7.5 ft.		00 / 00	a	NA NA		_	800
~ (G. Filter pack, top 612.6 ft. MSL of	г 7.9 а	. / 13	X / .	b. Volume added				
		II.		8.		: Manufacturer, product n Red Flint Filter Sand	ame & me	sn st	ze
]	H. Screen joint, top610.5 ft. MSL or	10.0 ft.			b. Volume added _	2.1 R ³			divis
				9.	Well casing:	Flush threaded PVC so	hedule 40	[Z]	23
_ I	. Well bottom 600.5 ft. MSL or	r 20.0 ft.				Flush threaded PVC so			
60	Filter pack, bottom 600.5 ft. MSL or	20.0	/) 層		-		Other		1.73
9	Filter pack, bottom 600.5 ft. MSL or	ft.		10.	Screen material:	PVC			
- F	K. Borehole, bottom 600.5 ft. MSL or	20.0 ft.		3	a. Screen Type:		actory cut		
2005	it. MOD of	It.					nuous slot		
o: I	Borehole, diameter 6.0 in.			X	b. Manufacturer		Other		كان
					c. Slot size:		- 3	0.01	0_ in.
e N	M. O.D. well casing				d. Slotted length:		_	10.0	0 ft.
N.	IID # AAH			N 11.	Backfill material (be	low filter pack):	None		
	J. I.D. well casingin.						Other		
199	hereby certify that the information on this form is	a t		Salar and a graduate control					
2 3	Signature	s true and correct		knowledge.					
	Nate Kelly Do		" RMTINC						Tel:
I S	Please complete both Forms 4400-113A and 4400-113B	and return them to	the appropriate DNI	R office and bures	u. Completion of these	reports is required by chs. I	60. 281. 281	280	Fax:

Please complete both Forms 4400-113A and 4400-113B and return them to the appropriate DNR office and bureau. Completion of these reports is required by chs. 160, 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stats., and ch. NR 141, Wis. Adm. Code. In accordance with chs. 281, 289, 291, 292, 293, 295, and 299, Wis. Stats., failure to file these forms may result in a forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on these forms is not intended to be used for any other purpose. NOTE: See the instructions for more information, including where the completed forms should be sent.

State of Wisconsin Department of Natural Resources

MONITORING WELL DEVELOPMENT Form 4400-113B Rev. 7-98

Route To: Watershed/Wat				ste Management 🗵 er 🗌]					
Remediation/R	edevei	County	Out	ei 🗆	Well N	ame		_		
Facility/Project Name	0250	County	Gr	ant	Went	ALLIC	R.	07R		
WPL - Nelson Dewey Generating Station Facility License, Permit or Monitoring Number	ш	County Code		ant 3. Unique Well Nur	nber	-	DNR Well			
02525		22		VU60				156	j	
02025										
1. Can this well be purged dry?	□ Ye	s 🗆 No	11.	Depth to Water	Before	Deve	elopment	After I	Develop	ment
2. Well development method:			1	(from top of	a.		15.50 ft.		17.8	35 ft.
surged with bailer and bailed	□ 4	1		well casing)						
Sarged With Santa and Panish and	_	5.1		_		4/20	/2000		4/29/20	20
builded with other and other		2		Date	b.	4/29/	/2009		4/23/20	JJ
purper man areas bearing		2								⊠
Jan 800 11111 011111, 111111, 111111, 111111		0		re.		,	a ⊠ 1 ⊐ 7:55		00.	a.m ⊠ p.m □ 50
Compressed and	_	2.0		Time	C.	,	07.33 L p	2-111	07.	50 Ш р.н
outlog only	_	. 0	1,2	Sediment in well			inches			inches
pumped only		5 1	12.	bottom			menes			IIIOIIOS
pumped storing		imp	12	Water clarity	Clear	_ 1	. 0	Clear	⊠ 20	
other surged and pumped with with			13.	water clanty	Turbid (Describ	⊠ I	5	Turbid (Describe	□ 25	
3. Time spent developing well		115 min.			dark	reddi		light b	rown, n	0
4. Depth of well (from top of well casing)	2	23.0 ft.			brow	n, no	odor	odor		
5. Inside diameter of well	Ź	2.07 in.			-			-		
6. Volume of water in filter pack and well										
casing		1.5 gal.								
			Fi1	l in if drilling fluid	s were used	l and v	well is at sol	lid waste f	acility:	
7. Volume of water removed from well		20.0 gal.							06.5	_
			14	. Total suspended			mg/l		96./	mg/l
8. Volume of water added (if any)		10.0 gal.		solids						
Source of water addedfire suppression sy	stem	hydrant_	15	. COD			mg/l			mg/l
			16.	Well developed by	: Person's	Name	and Firm			
10. Analysis performed on water added?	⊠ Ye	es 🗆 No	i	Roy Bi	ıckenber	ger				
(If yes, attach results)				•		_	-			
Name and the second sec				Layne	Christens	sen, C	20.			
17. Additional comments on development:										
on the state of th										
8/27/09										
CO CO										
2003										
Facility Address or Owner/Responsible Party Address										
Facility Address or Owner/Responsible Party Address	3		II	nereby certify that t	he above ir	ıforma	tion is true	and correc	t to the be	st of my
				nowledge.						
Firm: Nelson Dewey Generating Statio	n		Si	gnature:	te 6	ell	u/5	20		
Street: 11999 County Rd VV			. Pr	rint Name: Nath	aniel Kel	ler				
Name: Nathaniel Sievers Nelson Dewey Generating Statio Street: 11999 County Rd VV City/State/Zip: Cassville, WI 53806			Fi	m: RMT	, Inc.					

NOTE: See instructions for more information including a list of county codes and well type codes.

State of Wisconsin Department of Natural Resources	Route T	l Waste	(3)	laz. Wast					Soil Bo Form 44	_	_	form	ation 7-91
	☐ Eme	rgency Respons tewater	□ v	Jndergrou Water Reso		8					1	•	1
Facility/Project Name WP&L - Nelson Dewey 4293.02	,			License/ 2525	Permit/N	Ionitori	ng Numl	ber		Pag Numb		of	1
Boring Drilled By (Firm name and name of Environmental & Foundation I Kevin Hargis				Date Dri	lling Sta / 17/97	rted	Dat	e Drillin		oleted		ng Met	
ONR Facility Well No. WI Unique We	l No.	Common Well	Name	Final Sta				face Elev			Borehol		eter Inches
155 Boring Location	N.	I, E		Lat	0 9	eet MSL	Loc	al Grid	Location	n (If ap)	
State Plane NW 1/4 of WW 1/4 of Section	19	T 3 N,R 5		Long	0)			65,843 Fe		NI,6	95,868	Feet	⊠ E □ w
County Grant			DNR Cou	inty Code		Town/G sville	City/ or `	Village					
Sample # #								٥ د	Soil	Proper	ties	1	-
H H H H S	d Geolog	Description gic Origin Fo Iajor Unit		0 0 0	Graphic			Standard Penetratio	Moisture Content	Liquid	Ø €	1	Comments
Boring E a depth B-11 for B-11 for B-11 for B-12 E-13 E-14 E-15 E-16 E-17 E-18 E-19 E-20 E-21 E-22 E-23	of 23 ft.	s blind drille See boring ic description	log n.	SP/S'	V								
Signature	form is tru	e and correct to		my know	RMT	1							
Jan Ch	Jel				744 H	eartland	Trail, N 4444, Fa						
his form is authorized by Chapters 144, 14 his nor more than \$5,000 for each violation. Each day of continued violation in	17 and 162 n. Fined no s a separate	Wis. Stats. Co ot less than \$10 e offense, pursu	ompletion of or more the ant to ss 14	of this repo an \$100 o 14.99 and	rt is ma impriso 162.06,	ndatory. oned not Wis. St	Penalti less tha ats.	ies: Forf n 30 day	eit not l	ess than	n each		

Facility/Project Name 4293.01 Local Grid Location of Well Well Name B-11R	
WP&L Nelson Dewey ft. □Sft. □W. Facility License, Permit or Monitoring Number Grid Origin Location Lat° or St. Plane 265,843 ft. N, 1,695,868 ft. E.	
Lat ° _ ' _ ' Long ° _ ' _ ' or St. Plane 265,843 ft. N, 1,695,868 ft. E.	
Lat ° _ ' " Long ° _ ' " or St. Plane 265,843 ft. N, 1,695,868 ft. E.	
	155
Date Well Installed Section Location of Waste/Source Date Well Installed	_
ft. □E. □E. 11. NW ¼ of NW ¼ of Sec.19, T3N, R5 ⊠W. MM	/ 17/ 97 DD YY
Type of Well:Water Table Observation Well 🖾 11 Location of Well Relative to Waste/Source Well Installed By: (Person's Name and F	irm)
Piezometer □12 U □Upgradient S □Sidegradient Kevin Hargis D ⊠Downgradient N □Not Known Fourtenmental and Foundation Drilling	
Environmental and Foundation Drining	
Well A Point of Enforcement Std. Application? ☐ Yes ☑ No Waunakee, Wisconsin	
dive pipe, top elevation 622.56 ft. MSL 1. Cap and lock?	i □No
pasing, top elevation 622.62 ft. MSL Protective cover pipe:	
a. Inside diameter: 4.0	
b. Length: 7.0	
ce seal, bottom 619.4 ft. MSL or 1.0 ft. Steel Other	
d. Additional protection? □Yes	_
If yes, describe:	
GM □ GC □ GW □ SW □ SP □	ETIO C
SC ML MH CL CH Sentonite Sentonite Concrete	
Other	
ave analysis attached? Yes No No	
4. Material between well casing and protective pipe: Bentonite Bentonite	⊠30
Hollow Stem Auger ☑41	
Other Other	_
Dung fluid used: Water □02 Air □01 5 Annular space seal: a Granular Bentonite	
Drilling Mud □03 None 图99	
c. Lbs/gal mud weight Bentonite slurry	□31
d. % BentoniteBentonite-cement grout	□50
e. Ft ³ volume added for any of the above f. How installed: Tremie	□01
Tremie numed	
Gravity	⊠08
6. Bentonite seal: a. Bentonite granules	L133
b. □ 1/4 in. ☑ 3/8 in. □ 1/2 in. Bentonite pellets	
seal, top 619.4 ft. MSL or 1.0 ft. C. Other	
7. Fine sand material: Manufacturer, product name, product	nesh siz
b. Volume added 20 lbs	
605.4 ft. MSL or 15 ft. 8. Filter pack material: Manufacturer, product, mesh s	size
a. 30 - 50 b. Volume added 300 /bs	
598.4 ft. MSL or 22 ft. 9. Well casing: Flush threaded PVC schedule 40	⊠23
597.4 ft. MSL or 23 ft. Flush threaded PVC schedule 80 Other	□24 □
597.4 ft. MSL or 23 ft. 10. Screen Material: Sch 40 PVC a. Screen type: Factory cut	
8.25 in. Continuous slot	□01
Other 2.38 in. Manufacturer Boart Longyear	_
	0.010 ir
44 8 450	5.0 ft ⊠14
	4) لک
that the information on this form is true and correct to the best of my knowledge.	

RMT, Inc.

RMT, Inc.

1.44, Ws. Stats, failure to file this form and return to the appropriate DNR office listed at the top of this form as required by chs. 144, 147 and 160, Wis. Stats, and ch. NR 141, Wis. Adm. Code. In a forfeiture of file this form may result in a forfeiture of not less than \$10, nor more than \$5,000 for each day of violation. In accordance with ch. 147, Wis. Stats, failure to file this form may result in a forfeiture of not more than \$10,000 for each day of violation. NOTE. Shaded areas are for DNR use only. See instructions for more information including where the completed form

_{State} of Wisconsin _{Depart}ment of Natural Resources

MONITORING WELL DEVELOPMENT Form 4400-113B Rev. 4-90

<u>Route to:</u> \$ Env. Response & R		Haz. Waste ☐ ground Tanks ☐Ot		
acility/Project Name P&L Nelson Dewey	County Name Grant		Well Name B-11R	
acility License, Permit or Monitoring Number 525	County Code <u>22</u>	Wis. Unique Well Nu	mber DNR	Well Number <u>155</u>
Can this well be purged dry?	es ⊠No		Before Development	After Development
surged with bailer and pumped Surged with block and bailed	41 ॼ 61 42	11. Depth to Water (from top of well casing)	a. <u>17.5 ft</u>	<u>17.5 ft</u>
surged with block, bailed and pumped [compressed air	☐ 62 ☐ 70 ☐ 20 ☐ 10	Date	b. <u>11/18/97</u> mm/dd/yy	11/18/97 mm/dd/yy
pumped only [pumped slowly	51 50	Time	☐ a.m. c. <u>13:45</u> ⊠ p.m.	☐ a.m. 14:20 ⊠ p.m.
Time spent developing well	35 min.	12. Sediment in well bottom	0.5 inches	0.0 Inches
Depth of well (from top of well casing)	25.5 ft.	13. Water clarity	Clear □10 Turbid 図15 (Describe)	Clear ⊠20 · Turbid □25 (Describe)
5 Inside diameter of well	<u>2.0</u> in.			
Volume of water in filter pack and well casing	3.0 gal.			
Volume of water removed from well	<u>35_g</u> al.	Fill in if drilling fluids w	vere used and well is at solid	l waste facility:
Volume of water added (if any)	<u>0_g</u> al.			
Source of water added		14. Total suspended solids	mg/l	<u>110</u> mg/L
		15. COD	mg/l	mg/L
Analysis performed on water added? If yes, attach results)	□Yes □No			
Additional comments on development:				
developed by: Person's Name and Firm Kevin Baker		I hereby certify that the knowledge.	e above information is true a	nd correct to the best of my
RMT, Inc.		Signature:		
		Print Initials: KLB		
Kite		Firm:		
Shaded areas are for DNR use only. See in	structions for more	o information including a	list of sounds and a	

	of Windertment			□ Eme	To: d Waste ergency Respons stewater	□ н •• □ u	az. Was ndergroi Vater Re	e ind Tan	ks			011 B		_	Inio	7-91
				L Wa	itewater	0		sources					P	age 1	of	3
	ty/Pro	-		ey 3314.01				Permit,	Monitor	ing N	umber	Borin B1	_	nber		
Borin	g Drille	d By	(Firm n	ame and name of cre	•		Date Dr	illing St	arted	Date	Drilli	ng Cor	nplete	d Drilli	ng Me	thod
G.	Mark	graf		oundation Drillin				2/1/9			-	1/94		DTI		
			No. W	'I Unique Well No.	Common Well	Name	Final St		ter Level et MSL	62	20.2	Feet M	(SL	Borehol	7.5	meter Inches
	g Locat Plane		65003	.10 N, 172726	5 86 F		Lat	0 9	rt	Loca	l Grid		-	applica	ble)	
NE				4 of Section 19.	T3 N,R5\	¥	Long	0 9	11		Fe	_ -⊡ ⊀e			Feet	□ E
Count	у		•			DNR Cou				ty/o						
Gra		T	· -	1		22	- 1	Cas	sville			<u> </u>	7			—
Sar	nple	Ŋ	Feet								uo	2011	Prop	erties	Т	-
	F	Counts	H.		k Description			İ	1	*	d †ia	a u				S
r L	th ver	ပိ	1	1	ogic Origin	For	S	jic	am	GI-	dar tra	tur	ָם ו	15 +	٦	tua tua
Number	Length (In) Recovered	9	Depth	Each	Major Unit		ဟ	Graphic Log	Well Diagram	PID⁄FID	Standard Penetratic	ois ont	Liquid	ast	200	Comments
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I hereb	y certif	y that		formation on this form	n is true and co	rrect to t	he best o	f my kn	owledge.					<u> </u>	 -	<u> </u>
Signatı	ıre			Chapters 144, 147 an		Fi	rm	RMT 744 He: Tel: 60	artland T 3-831-44	rail, l	Fax: 60	8-831	-3334			

This form is authorized by Chapters 144, 147 and 162, Wis. Stats. Completion of this report is mandatory. Penalties: Forfeit not less than \$10 nor more than \$5,000 for each violation. Fined not less than \$10 or more than \$100 or imprisoned not less than 30 days, or both for each violation. Each day of continued violation is a separate offense, pursuant to as 144.99 and 162.06, Wis. Stats.

		ng Num	ber	B1:	1A	Use only as	an attachment to For	m 4400-	-122.						ze 2	of	3
-	Sai	mple	ß	Feet			91		·			Ē	Soil	Prope	rties	T	-
		Length (In) Recovered	Counts	H		Soil/Rock D And Geologic	escription Origin For	S	U	E		Standard Penetration	a +		U		s
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	ng Nu	mber	B1	1A	1	Use only	as an	attac]	hment	to Fo	orm 4	100-1	.22.						Page	3	of .	3
Number	Length (In)	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	 Depth In Feet		And	l/Rocl Geolo Each N	gic C	Origin	1 For			S C S	Graphic Log	Well	Jiagram	PID/FID	Standard Penetration		÷ .	0	200	Comments
NCM	Len		 dəQ 54 55 - 56		l rod 1	to 53'.															a.	

Facility/Project Name		rground Tanks Other	Form 4400-1	Rev.
WP&L Nelson Dewey 3314.01	Local Grid Location	on of Well	Well Name B-118' A M.	(m 12/30/94
Facility License, Permit or Monitoring N	Lat	ion or		umber DNR Well Number
Type of Well:Water Table Observation V Piezometer	Vall 14 St Plane	tl N, tl E. PN, 1,727,265.86E	Date Well Installed	
Distance Well is From Waste/Source Bo	Section Location of	of Waste/Source		12 / 01 / 94 MM DD YY
Afrex. 300'	the HER OF THE A OF T	Sec. <u>19, T_3N, R_5</u> ■ W.	Well Installed By: (P.	ersons' Name and Firm)
Is Well A Point of Enforcement Std. Appl		elative to Waste/Source S	Greg Markgraf, Environ Drilling	onmental & Foundation
			F	
	622.20 ft MSL		d lock?	™ Yes 🔲 N
	22.12th MSL	2. Protecti a. Insid	ive cover pipe: de diameter:	
= -	20.2 ft. MSL	b. Leng c. Mate	gth:	3.8i _7.0 Steel 麗 0
12. USCS classification of soil near scre	MSL orft	d. Addi	itional protection? s, describe:	Other 🗎 🖁 Ves 📙 R
SM SC ML MH C	- CH -	3. Surface	seal:	Bentonite M 30
13. Sieve analysis attached? Yes	No M	4. Material	between well casing and	Other 🗍 🐰
14. Drilling method used: Rotary Hollow Stem Auger	□ 50 □ 41		•	Bentonite 3 0 30 anular space seal Other
Dual tube reverse circulation Other 15. Drilling fluid used: Water Class		5. Annular s	space seal: a. Gr.	ranulas Bassaulus — a
Drilling Mud 03	Air = 01 None	d % e. lb	s/gal mud weight Bento s/gal mud weight Bentonite Bentoni volume added for any of	Bentonite slurry 31
16. Drilling additives used? Yes	No ■	f. How is	nstalled:	Tremie 01 Tremie 02
Describe	— l 🐰	6. Bentonite		Gravity 08
7. Source of water (attach analysis):		b 1/4	in. ■3/8 in. □ 1/2 in. B	Other 🔲 🦹
Bentonite seal, topft. MSL	or 0.0 ft.		material: Manufacturer, p r Mining 40-60 added 1 bag, 50 lbs	product name, mesh size
Fine sand, topft_ MSL	\ ₩	8. Filter pack	material: Manufacturer, Mining #30	product, mesh size
Filter pack, topft. MSL		b. Volume	added 500 lbs, 10 bacs	<u>s</u>
Screen joint, topft_ MSL		9. Well casing	Flush threaded PV Flush threaded PV	C schedule 40 🚆 23 C schedule 80 🗍 24
/ell bottomft_ MSL o	or <u>50.0</u> ft	10. Screen Mat		Other 🗋 🧋
itter pack, bottomft_ MSL o	or_56.0#	a. Screen	type:	Factory cut # 11
Borehole, bottom	or_56.0 ft	b. Manufac	turer Northern Air	ontinuous slot 01 Other
orehole, diameter	_ 7 . <u>5</u> in.	c. Slot size d. Slotted le		0. <u>0 1</u> in. _ <u>5</u> . 0 ft.
D.D. well casing	_2.2_in.	11. Backfill mate	erial (below filter pack):	None 114
D. well casing	_2.0_in_		· · · · · · · · · · · · · · · · · · ·	Other 🔲 🖔
eby certify that the information on this form				

Flease complete both sides of this form and return to the appropriate DNH office listed at the top of this form as required by cns. 144, 147 and 160, Wis. Stats., and ch. NR 141, Wis. Adm. Code. In accordance with ch. 144, Wis. Stats., failure to file this form may result in a forfeiture of not less than \$10, nor more than \$5,000 for each day of violation. In accordance with ch. 147, Wis. Stats., failure to file this form may result in a forfeiture of not more than \$10,000 for each day of violation. NOTE: Shaded areas are for DNR use only. See instructions for more information including where the completed form should be sent

16. Additional comments on development:

Route to: Solid Waste | Haz. Waste | Wastewater | Env. Response & Repair | Underground Tanks | Other | Facility Project Name County Name WP & L'Nesion Dewey Casseville Mell Vame Grant Facility License, Permit or Monitoring Number BIIBA MIA County Code Wis. Unique Well Number DNR Well Number 1. Can this well purged dry? □ Yes ■ No Before Development After Development 2. Well development method 11. Depth of Water surged with hailer and hailed (from top of J 41 2 _ 1 6 . 4 _ A _16.4 5 A surged with bailer and pumped well casing) surged with block and bailed 圖 6 1 0 4 2 surged with block and pumped Date b. 12/01/54 surged with block, bailed and pumped □ 6 2 12/01/94 mmdd yy **0**70 mmdd yy compressed air 20 bailed only O 10 🗆 a.m Dam. pumped only Time _5:<u>05</u> ■ p.m 0.51 _ <u>5</u> : <u>4 _5</u> ■ p.m. pumped slowly O 50 Other _ 12. Sediment in well _ <u>0</u> . <u>0</u> inches $\underline{0} \cdot \underline{0}$ inches bonomi 3. Time spent developing well __4_5_ min. 13. Water Clarity 4. Depth of well (from top of well casing) Clear 0 Clear 2 0 Turbid 🔳 15 5 2.1 ft Turbid 🛛 25 (Describe) 5. Inside diameter of well (Describe) __ <u>2</u> . <u>0</u> <u>3</u> in. 6. Volume of water in filter pack and well __ 2 . 2 gal./ft 7. Volume of water removed from well 1 0 0 0 . 0 gal 8. Volume of water added (if any) Fill in if drilling fluids were used and well is at solid waste facility: _ gal. 9. Source of water added _ 14. Total suspended mg/l solids 10. Analysis performed on water added? 15. COD □ Yes □ No (if yes, attach results) mg/l mgl

Well developed by: Person's Name and Firm	
vame: Charles Markgraf	I hereby certify that the above information is true and correct to the best of my knowledge.
irm: Environmental & Foundation Drilling, Inc.	Signature:
	Print Initials: G D A
NOTE: Shaded areas are for DND	Firm: Environmental & Foundation Drilling, Inc.

NOTE. Shaded areas are for DNR use only. See instructions for more information including a list of county codes.

	7		nt of N		Resources		id Waste			s. Was					Soil Form	Borin 4400-1	g Log	g Info	ormatic 7-91
						∐ Em	ergency Resp stewater			idergroi ater Rei	ınd Tan	ks							
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		lity/Pr P&T			wey 3314.	Λ1			I	License	Permit	/Monit	oring	Numbe		ng Nur	nber		-y
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	En	viron	ment	al &	Foundation	Drilli	ng, Crew (Chief:					D	ate Dril			- 1		thod
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	Coun	ty	. 01 11	<u>~</u>	1/4 of Section	19	T 3 N,R	DNR C		Long	O s in		7:4/	F	eet- 🗌	_ S		Feet	□w
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					<u>.</u>					74.	Heartl								
Thi \$10	form	is aut	norize	d by C	hapters 144, 1	47 and 1	62, Wis. Stati	. Compl	etio	n of thi	l: 608-8 report	is man	dato	ax: 608	-831-3	334 Forfait	A 1.	- 43	

Th \$10 \$10 nor more than \$5,000 for each violation. Fined not less than \$10 or more than \$100 or imprisoned not less than \$0 days, or both for each violation. Each day of continued violation is a separate offense, pursuant to ss 144.99 and 162.06, Wis. Stats.

	Borin	g Num	ber		Use only as an attachment to For	m 4400-	122.					Pag	e 2	of	4
-	Sar	nple	S	Feet							Soil	Prope	rties		
		Length (In) Recovered	Counts	In F	Soll/Rock Description	ĺ				t i g					
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*	***************************************			E 24											
	E			E 26	As above.				,		W				
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	000000			28											
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	F			= 30	As above cond modium and a										
	200000			31	As above, sand medium grained, grains are light yellowish brown,						W	.	. [
	2000000			32	yellowish brown and very dark brown.										
1				33					.						
	000000		[34											·
	3			-35	As above, fine grained, light						w				
	TOTOTOTO			-36	yellowish brown 10YR 6/4.						.		-		•
	0000000			-37									.	·	
	000000			-38	·					İ					·
	100000			-39											
E	I 20000			-41	As above, slightly coarser grained sand than at 35', fine to medium						w			ļ	
	000000		E	-42	grained.										
	000000			-43											
	000000			-44										1	
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	200000			-46	110 800 (0.						W				
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		ng Num	ber	B1	1B Use only as an attachment to F	orm 4400	-122.			·			 of	4
	Number	Length (In)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	SUSA	Graphic Log	Well Diagram	PID/FID	Standard Penetration	Moisture Content	Prope pinbil pimil	P 200	Comments
	K			54 55 	As above, sand finer grained than at 50', yellowish brown 10YR 5/4.					٠	÷₩			
	L			-59 -60 -61 -62	As above, sand medium grained.						w			
	maaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaa			55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71	As above.						w .			
			ևուկուսկուսկուն	-69 -70 -71 -72	As above.						w			•
(<u>անամանականականականականանանում անանանում ան</u>	73 -74 -75 -76 -77	As above, 75% medium and 25% coarse grained sand.						w			
F			ևահափափամամ	79 80 81 82	As above, sand fine grained.						w			
Q	DOCOMOCO (MOTOCOCOCO			34 35 36	As above, 75% fine grained and 25% medium grained sand.					V	×			

	Borin	g Num	ber	B1	1B Use only as an attachment to For	m 4400-	122.					Pag	ze 4	of	4
_	San	nple		Feet							Soil	Prope	rties		
	Number	Length (In) Recovered	Blow Counts	Depth In	Soil/Rock Description And Geologic Origin For Each Major Unit	s c s n	Graphic Log	Well Diagram	PID/FID	Standard Penetration	Moisture Content	Liquid Limit	Plastic Limit	P 200	Comments
	000000000			87 = 88						,					
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	R			= 90 = 91	As above.						₩				
				92					,						
	200000000000000000000000000000000000000		4.5	93 94											
	S			90 91 92 93 94 95	As above, 75% medium and 25%						w				
	00000000000000000000000000000000000000			96 - 97	coarse grained sand.										
	000000000	,		98	~ · · · · · · · · · · · · · · · · · · ·				ļ						-
	T 0000			97 98 99 100	As above, 50% medium and 50%				·		w				
	OCCUPATION OF THE PROPERTY OF			-101 -102	coarse sand.			§ §							
	***************************************	-		-103											
τ	7			-102 -103 -104 -105	As above, 90% medium and 10%						w			·	
٠	000000000000000000000000000000000000000			- 100	coarse sand.						*				
	000000000000000000000000000000000000000			-108	·										
ν	000000000			-106 -107 -108 -109 -110	As above, 50% medium and 50%										
			F	-111	coarse sand.	2000					W				
	TOTAL DESIGNATION OF THE PARTY		шш	-113											
			ւևուր	-114	As above.										
			Industrial	116							w				
					End of Boring at 117 Ft.	ľ									

of Wisconsin Partment of Natural Resources Route to: Soli	d Waste Haz. Waste Wastewater & Repair Underground Tanks Other	MONITORING WELL CONSTRUCTION Form 4400-113A
Facility/Project Name WP&L Nelson Dewey 3314.01	Local Grid Location of Well N. E. 1. S. 1. W.	Well Name B-11x B Mcm (2/30/qu)
Facility License, Permit or Monitoring Number	Grid Origin Location Lat Long. or St Plane ft N, ft E.	Wis. Unique Well Number DNR Well Num
Type of Well:Water Table Observation Well ☐ 11 Piezometer ■ 12	St Plane	Date Well Installed
Distance Well is From Waste/Source Boundary APPROX. 300/	NE% of NE% of Sec.19, T3N, R5 W. Location of Well Relative to Waste/Source	Well Installed By: (Persons' Name and Firm)
Is Well A Point of Enforcement Std. Application?	U Depart S Sidegradient D Dewngradient N Not Known	Greg Markgraf, Environmental & Foundation Drilling
A. Protective pipe, top elevation 622.02th		l lock? ■ Yes □
B. Well casing, top elevation 621.89 th C. Land surface elevation 619.7 th	a. Insid. b. Leng	
D. Surface seal, bottom	d. Addit	ial: Flush Mount Steel Other Other describe:
SM SC ML MH CL CH	3. Surface s	eal: Bentonite MacConcrete Concrete Other
13. Sieve analysis attached? Yes No M 14. Drilling method used: Rotary 50 Hollow Stem Auger 41 Dual-tube reverse circulation Other M	5. Annular s	Annular space seal Other age and Granular Bentonite
15. Drilling fluid used: Water 02 Air 101 Drilling Mud 03 None 99 16. Drilling additives used? Yes No 11	d. × a	Tremie pumped 🗏 0
Describe 17. Source of water (attach analysis):		n. ■3/8 in. ☐ 1/2 in. Sentonite pellets ■ 3. Other ☐
E. Bentonite seal, toptL MSL or _ 9 5 . 0	800 X / / 4 OHININ	material: Manufacturer, product name, mesh siz silica sand added 50 lbs, 1 bag
F. Fine sand, top	h Volume	material: Manufacturer, product, mesh size Mining #30 added 4 bags, 200 lbs
G. Filter pack, topft_ MSL or 1 0 3 . 5 H. Screen joint, topft_ MSL or 1 0 6 . 3	9. Well casing	Flush threaded PVC schedule 80 = 24
Well bottomtL MSL or 111.3 J. Filter pack, bottomtL MSL or 111.3	10. Screen Mark	***
C Borehole, bottomft_ MSL or 1 1 1 . 3:	b. Manufaci	Continuous slot 01 Other 0
Borehole, diameter _ 7 . 5 in	c. Slot size: d. Slotted le	ngth: Q. 0 j in 5 . 0 ft
1. O.D. well casing 2 . 3 8 in 1. I.D. well casing 1 . 8 9 in	Natural mate	rial (below filter pack): None 14 rial (medium sand) Other
hereby certify that the information on this form is true and	correct to the best of my knowledge	
lease complete both sides of this form and return to the a tats., and ch. NR 141, Wis. Adm. Code. In accordance with	Firm. KMT, Inc.	7. 22 /AQUILLE 1

Stats., and ch. NR 141, Wis. Adm. Code. In accordance with ch. 144, Wis. Stats., failure to file this form may result in a forfeiture of not less than \$10, nor more than \$5,000 for each day of violation. In accordance with ch. 147, Wis. Stats., failure to file this form may result in a forfeiture of not more than \$10,000 for each day of violation. NOTE: Shaded areas are for DNR use only. See instructions for more information including where the completed form should be sent.

Facility/Project Name	County Name	nergionic rand in outer in	Well Name
WP & L'Nesion Dewey/Casseville	Gmat		2-11xB mm 12/
Facility License, Permit or Monnoring Number	County. Code	Wis. Unique Well Number	DNR Well Number
1. Can this well purged dry?	□ Yes ■ No	Before Developmen	After Development
2. Well development method surged with hailer and hailed surged with bailer and pumped surged with block and bailed surged with block and pumped surged with block, bailed and pumped compressed air bailed only pumped only pumped slowly Other	- 4 1 - 4 1 - 4 2 - 6 2 - 7 0 - 2 0 - 1 0 - 5 1 - 5 0 - 3 5 min 4 5 min 1 1 3 5 ft.	11. Depth of Water (from top of a _ 1 6 . 4 _ ft. well casing) Date b. 1 2 / 0 1 / 2 4 - ft. m m d d y y m m d d y y 12. Sediment in well bottom 13. Water Clarity Clear	
5. Inside diameter of well	<u>2</u> . <u>0</u> <u>3</u> in.	(Describe)	(Describe)
6. Volume of water in filter pack and well casing 7. Volume of water removed from well 8. Volume of water added (if any) 9. Source of water added 10. Analysis performed on water added? (If yes, attach results)	2.2 gal.ft 1 3 5 0.0 gal gal.	Fill in if drilling fluids were used and 14. Total suspended mg1 solids 15. COD mg1	mg1

Well developed by: Person's Name and Firm	I hereby certify that the above information is true and correct to
Name: Charles Markgraf	the best of my knowledge.
Firm: Environmental & Foundation Drilling, Inc.	Signature:
	Print Initials: G A
	Firm: Environmental & Foundation Drilling, Inc.

· · · · · · · · · · · · · · · · · · ·	
	JOB NO. <u>C 9065</u>
//	BORING NO. B 31A
·	DATE 2/28/80
Elev. 623.	.69 CHIEF D. Braun
	ATIONCassville, Wisconsin
Elev62	All <u>depth</u> measurements of <u>well detail</u> assumed to be from ground surface unless otherwise indicated.
	DEPTH TO BOTTOM OF WELL POINT OR SLOTTED PIPE 34' FEET.
	DEPTH OF BOTTOM OF SEAL (if installed) 28 FEET.
5	DEPTH TO TOP OF SEAL (if installed) 25 FEET.
[- - - - - - - - - - - - - -	4 LENGTH OF WELL POINT, PVC WELL SCREEN OR SLOTTED PIPE 5 FEET. (Circle One)
	5 TOTAL LENGTH OF PIPE 33 FEET @ 2 IN. DIAMETER.
	6 TYPE OF FILTER MATERIAL AROUND WELL POINT OR SLOTTED PIPE Sand
	7 CONCRETE CAP, <u>YES</u> NO (Circle One)
2	8 HEIGHT OF WELL CASING ABOVE GROUND 4 FEET.
4	9 PROTECTIVE CASING? YES NO (Circle One) HEIGHT ABOVE GROUND
	LOCKING CAP? YES NO (Circle One)
	(10) TYPE OF BACKFILL: Soil & Bentonite Mix
	WATER LEVEL CHECKS
	From top of casing, if protective casing higher, take measurement from top of <u>protective</u> casing.
BORI	NG # DATE TIME DEPTH TO WATER REMARKS
3	1A 2/28/80 10.5' ¼ hour
	WARZYN



LOG OF TEST BORING

Project	Monitoring	Well

		Wisconsin

Boring No	31
Surface Elevation	
Job No C 906	55
Sheet o	r 1

1409 EMIL STREET • P.O. BOX 9538, MADISON, WIE. 53715 • TEL. (608) 257-4848

			PL		·	VISUAL CLASSIFICATION	so	IL PF	ROP	ERT	IES
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	<u>. </u>	<u> </u>	W	AT	ER I	LEVEL OBSERVATIONS	GE	NER	<u>, , , , , , , , , , , , , , , , , , , </u>	10V	ES
	::- 0 :	11						2/28/80			
	ile Dri	_		of D	rilling		Start	Chief .)B =	Bo	mb
	ne Aft				· · · · · · · · · · · · · · · · · · ·			ng Meth			
	oth to										
Des	oth to	Cav	e In	_							

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7			4		

LOG OF TEST BORING

Project WP&L
Nelson Dewey Generating Station

Boring No. B-31R
Surface Elevation
Job No. 13758

Location Cassville, Wisconsin Sheet _____ of ___ 1 ONE SCIENCE COURT . P.O. BOX 5385, MAD ISON, WIS. 53705 . TEL. (608) 273-0440 ----SAMPLE SOIL PROPERTIES VISUAL CLASSIFICATION y Rec Moist and Remarks Depth (qa) LL PL U (tsf) TOPSOIL - Brown Silty Sand FILL Loose, Tan Fine to Medium SAND (SW) 18 W 15-Medium Dense, Tan Medium to Coarse SAND (SW) 18 20-End Boring at 22.0' **GENERAL NOTES** WATER LEVEL OBSERVATIONS aile Drilling 星 Upon Completion of Drilling _ Start 4/25/89 End 4/25/89 Driller E&F Chief GA RigCME Time After Drilling Logger WB Editor AJS Depth to Water 14.0' Depth to Cave in Drill Method HSA 0-22' The stratification lines represent the approximate boundary between soil types and the transition may be gradual.

WARZYN ANGINEERING INC

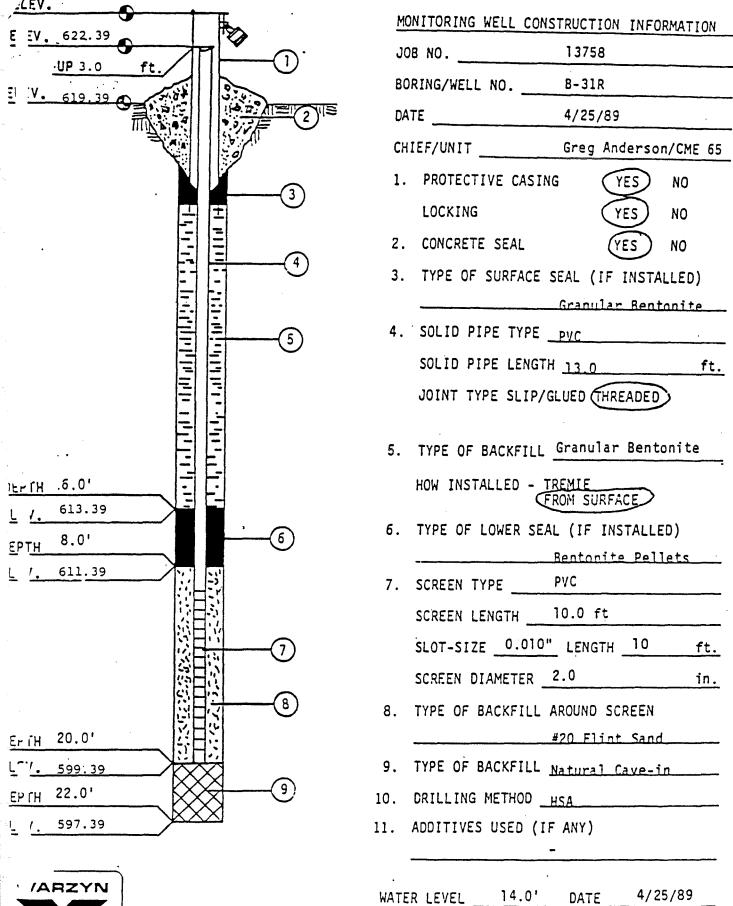
LOG OF TEST BORING

Project Nelson Dewey Generating Station

Location Cassville, Wisconsin

1409 EMIL STREET • P.O. BOX 9538, MADISON, WIS. 53715 • TEL. (608) 257-4848

		^ ^ ^ ^ ^ ^ ^ ^ ^ ^ ^	PL				T				
ļ., <u>.</u>	Reco		Mois			VISUAL CLASSIFICATION	SO	L PF	ROP.	ERT	IES \
No.	Туре	VEIY	, muis		Depth	and Remarks	qυ	W	ll:	PL	D
	.,,-				_	TOPSOIL-Brown Silty SAND					
· _1	SS	_X_	М	33			-				
2	SS	χ.	M	11	_ 5	F71.1					
	\$\$	_X_	_W_	_6		FILL					
4	SS	χ	W	3	E 10-						
5	SS	Χ	W	8	- 15-	Tan Fine to Medium SAND					
•											
6	SS	χ.	W_	18	- - - 20 -	·		·			
					E 20	Tan Medium to Coarse SAND, Trace Gravel					•
7_	SS	X	W_	11					·		
						•					
ا 8	SS	NR	W	15_	30-	·					
9	SS	Χ	W	27		Very Fine Tan SAND, Little Silt				-	
1				<u></u>	- 35 - -	End Boring at 35'					
l					E						
					40-						
			V	/AT	ER	LEVEL OBSERVATIONS	GE	NER	AL	רסא	res
Up	nile Di on Co ne Af	ampl	etion	9 -	Drilling 날 hou	ir	Crev	Chief	DB F	lig .Bo 0-10!	/28/80 omb Auger
	pth to pth to			_	10.5'		10-3	5'Wash	Bor	?	<i>)</i>



ft.

in.

*ALL DEPTHS MEASURED FROM GROUND SURFACE.



·	JOB NO. C 9036
	BORING NO. 26
	DATE 2/28/80
Elev. 628.31	CHIEF D. Braun
LOCATION: Net	son Dewey G.S.; Cassville, Wisconsin
to	be from ground surface unless otherwise dicated.
	DEPTH TO BOTTOM OF WELL POINT OR SLOTTED PIPE 29.5 FEET.
2	DEPTH OF BOTTOM OF SEAL (if installed)
3	DEPTH TO TOP OF SEAL (if installed) OFFEET.
4	LENGTH OF WELL POINT, PVC WELL SCREEN OR SLOTTED PIPE 10 FEET. (Circle One)
5	TOTAL LENGTH OF PIPE 23.5 FEET @ 2 IN. DIAMETER.
	TYPE OF FILTER MATERIAL AROUND WELL POINT OR SLOTTED PIPE <u>Sand</u> .
	CONCRETE CAP, YES NO (Circle One)
2 8	HEIGHT OF WELL CASING ABOVE GROUND 4 FEET.
4 6	PROTECTIVE CASING? YES NO (Circle One) HEIGHT ABOVE GROUND
	TYPE OF BACKFILL: Soil & Bentonite Mix
	WATER LEVEL CHECKS
	f casing, if protective casing higher, rement from top of <u>protective</u> casing.
BORING # C	ATE TIME DEPTH TO WATER REMARKS
26 2/2	8/80 17'8" ½ hour
	Extraction of

WARZYN



LOG OF TEST BORING

Project Nelson Dewey Generating Station
Proposed Slag Disposal Area
Location Cassville, Wisconsin

Boring No. B 26A
Surface Elevation 624.6
Job No. C 9036
Sheet 1 of 2

1409 EMIL STREET . P.O. BOX 9538, MADISON, WIS. 53715 . TEL. (608) 257-4846

_					· ·	STREET • P.O. BOX 9538, MADISON, WIS. 53715 • TEL, (6)					=
_		AMPLE VISUAL CLASSIFICATION and Remarks						IL P	ROP	ERT	IES
No.	Type	very	MOIS	ture	Depth	and Remarks	q.	w	ıı	PL	0
-					-	TOPSOIL					
<u> </u>	SS	Χ	М	_11_	1,1		4.5				
2	<u>\$\$</u> \$\$	X	M M	4	<u> </u>	Brown SILT, Some Clay, Some Sand (CL-ML) Occasional Sand Lenses			-		
3	ss	X	M M	5							
 <u>4</u>	SS		M	6					25.4	19.9	
					E						
5			V	9	E		┼—				······
_5		X	M	9	- - - -						
					E	Tan Coarse to Medium SAND, Some to Trace					
6	SS	Х	W	28	20-	Gravel, Trace Silt and Clay (SP)					
					E						
	SS	Χ	W	20	E ₂₅ -					·	
					E	Too Medium to Fine SAND Turne Curvel					
	ļ			ļ	E	Tan Medium to Fine SAND, Trace Gravel, Little to Trace Silt and Clay (SP)					
<u>ئ</u>	SS	X	W	11	<u>=</u> 30-						
					Ē						
9	S\$_	Χ	W	19	<u> </u>			<u> </u>			
	SS	X	W	27	E 40						
	1				E	Tan Coarse to Medium SAND, Some to Trace Gravel, Trace Silt and Clay (SP)					
	-		1	<u> </u>	E						
	<u>ss</u>	X	W	26	45	End Boring at 45'				† -··	
						(Continued)					,

WARZYN ENGINEERING INC

LOG OF TEST BORING

Project Nelson Dewey Generating Station
Proposed Slag Disposal Area
Location Cassville, Wisconsin

Boring No. B 26A
Surface Elevation 624.6
Job No. C 9036
Sheet 2 of 2

1409 EMIL STREET • P.O. BOX 9538, MADISON, WIS. 53715 • TEL. (608) 257-4848

SAMPLE Recovery Moisture						VISUAL CLASSIFICATION	so	IL PF	ROP	ERT	IES
	Reco	very	Mois		1	and Remarks	Qu	w	LL	PL	D
No.	Type	+	*	N	Depth		<u> </u>				
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			W	/AT	ER	LEVEL OBSERVATIONS	GE	NER	AL	NO.	TES
Wr	nile D	rilling	, 1	9.51		·	Star	t2/,27/	30com	nplet 2	/.27/.80
		-		of	Orilling			w Chief			
	ne Af				3/10/			ing Met			
	pth t				23,14			r to			
	pth t			_				n Bore		5'	

Appendix C Laboratory Analytical Reports





May 13, 2022

Meghan Blodgett SCS ENGINEERS 2830 Dairy Drive Madison, WI 53718

RE: Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Dear Meghan Blodgett:

Enclosed are the analytical results for sample(s) received by the laboratory on April 28, 2022. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

• Pace Analytical Services - Green Bay

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Dan Milewsky dan.milewsky@pacelabs.com (920)469-2436

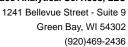
Lan Mileny

Project Manager

Enclosures

cc: Matt Bizjack, Alliant Energy
Sherren Clark, SCS Engineers
Tom Karwoski, SCS ENGINEERS
Nicole Kron, SCS ENGINEERS
Ryan Matzuk, SCS Engineers
Jeff Maxted, ALLIANT ENERGY
Marc Morandi, ALLIANT ENERGY







CERTIFICATIONS

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Pace Analytical Services Green Bay

1241 Bellevue Street, Green Bay, WI 54302 Florida/NELAP Certification #: E87948 Illinois Certification #: 200050 Kentucky UST Certification #: 82 Louisiana Certification #: 04168 Minnesota Certification #: 055-999-334

New York Certification #: 12064 North Dakota Certification #: R-150 Virginia VELAP ID: 460263

South Carolina Certification #: 83006001 Texas Certification #: T104704529-14-1 Wisconsin Certification #: 405132750 Wisconsin DATCP Certification #: 105-444 USDA Soil Permit #: P330-16-00157

Federal Fish & Wildlife Permit #: LE51774A-0



SAMPLE SUMMARY

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40244038001	FIELD BLANK	Water	04/25/22 15:00	04/28/22 08:20
40244038002	B-7R	Water	04/26/22 10:35	04/28/22 08:20
40244038003	B-11R	Water	04/26/22 13:15	04/28/22 08:20
40244038004	B-11A	Water	04/26/22 13:15	04/28/22 08:20
40244038005	B11-B	Water	04/26/22 12:15	04/28/22 08:20
40244038006	B-26	Water	04/25/22 15:05	04/28/22 08:20
40244038007	B-31R	Water	04/25/22 17:00	04/28/22 08:20
40244038008	B-31A	Water	04/26/22 14:50	04/28/22 08:20
40244038009	B-39	Water	04/25/22 13:00	04/28/22 08:20



SAMPLE ANALYTE COUNT

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Lab ID	Sample ID	Method	Analysts	Analytes Reported
40244038001	FIELD BLANK	EPA 6020B	KXS	2
		SM 2540C	SRK	1
		EPA 9040	YER	1
		EPA 300.0	НМВ	3
40244038002	B-7R	EPA 6020B	KXS	2
			KPR	7
		SM 2540C	SRK	1
		EPA 9040	YER	1
		EPA 300.0	HMB	3
40244038003	B-11R	EPA 6020B	KXS	2
			KPR	7
		SM 2540C	SRK	1
		EPA 9040	YER	1
		EPA 300.0	НМВ	3
40244038004	B-11A	EPA 6020B	KXS	2
			KPR	7
		SM 2540C	SRK	1
		EPA 9040	YER	1
		EPA 300.0	НМВ	3
40244038005	B11-B	EPA 6020B	KXS	2
			KPR	7
		SM 2540C	SRK	1
		EPA 9040	YER	1
		EPA 300.0	НМВ	3
40244038006	B-26	EPA 6020B	KXS	2
			KPR	7
		SM 2540C	SRK	1
		EPA 9040	YER	1
		EPA 300.0	HMB	3
40244038007	B-31R	EPA 6020B	KXS	2
			KPR	7
		SM 2540C	SRK	1
		EPA 9040	YER	1
		EPA 300.0	НМВ	3
40244038008	B-31A	EPA 6020B	KXS	2
			KPR	7
		SM 2540C	SRK	1

REPORT OF LABORATORY ANALYSIS

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SAMPLE ANALYTE COUNT

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Lab ID	Sample ID	Method	Analysts	Analytes Reported
		EPA 9040	YER	1
		EPA 300.0	HMB	3
40244038009	B-39	EPA 6020B	KXS	2
			KPR	7
		SM 2540C	SRK	1
		EPA 9040	YER	1
		EPA 300.0	HMB	3

PASI-G = Pace Analytical Services - Green Bay



ANALYTICAL RESULTS

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Date: 05/13/2022 01:21 PM

Sample: FIELD BLANK	Lab ID:	40244038001	Collecte	d: 04/25/2	2 15:00	Received: 04/	/28/22 08:20 M	atrix: Water	
Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6020B MET ICPMS	•	Method: EPA 6			thod: El	PA 3010A			
Boron Calcium	<3.0 <76.2	ug/L ug/L	10.0 254	3.0 76.2	1 1	05/02/22 06:14 05/02/22 06:14	05/11/22 04:09 05/11/22 04:09		
2540C Total Dissolved Solids	•	Method: SM 25		y					
Total Dissolved Solids	<8.7	mg/L	20.0	8.7	1		04/28/22 15:21		
9040 pH	•	Method: EPA 9 lytical Services		у					
pH at 25 Degrees C	7.5	Std. Units	0.10	0.010	1		04/28/22 14:13		H6
300.0 IC Anions	•	Method: EPA 3 lytical Services		у					
Chloride Fluoride Sulfate	<0.43 <0.095 <0.44	mg/L mg/L mg/L	2.0 0.32 2.0	0.43 0.095 0.44	1 1 1		05/10/22 19:09 05/10/22 19:09 05/10/22 19:09	16984-48-8	



ANALYTICAL RESULTS

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Date: 05/13/2022 01:21 PM

Sample: B-7R	Lab ID:	40244038002	Collected	: 04/26/22	2 10:35	Received: 04/	/28/22 08:20 Ma	atrix: Water	
Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6020B MET ICPMS	•	I Method: EPA 6	•		hod: El	PA 3010A			
	Pace Ana	alytical Services	- Green Bay						
Boron	98.1	ug/L	10.0	3.0	1	05/02/22 06:14	05/11/22 04:16	7440-42-8	
Calcium	59200	ug/L	254	76.2	1	05/02/22 06:14	05/11/22 04:16	7440-70-2	
Field Data	Analytica	l Method:							
	Pace Ana	alytical Services	- Green Bay						
Field pH	6.43	Std. Units			1		04/26/22 10:35		
Field Specific Conductance	614.1	umhos/cm			1		04/26/22 10:35		
Oxygen, Dissolved	0.82	mg/L			1		04/26/22 10:35	7782-44-7	
REDOX	-86.1	mV			1		04/26/22 10:35		
Turbidity	3.56	NTU			1		04/26/22 10:35		
Static Water Level	609.84	feet			1		04/26/22 10:35		
Temperature, Water (C)	8.5	deg C			1		04/26/22 10:35		
2540C Total Dissolved Solids	Analytica	l Method: SM 25	540C						
	Pace Ana	alytical Services	- Green Bay						
Total Dissolved Solids	318	mg/L	20.0	8.7	1		04/28/22 15:21		
9040 pH	Analytica	l Method: EPA 9	040						
	Pace Ana	alytical Services	- Green Bay						
pH at 25 Degrees C	6.6	Std. Units	0.10	0.010	1		04/28/22 14:19		H6
300.0 IC Anions	Analytica	l Method: EPA 3	0.00						
	Pace Ana	alytical Services	- Green Bay						
Chloride	12.0	mg/L	10.0	2.2	5		05/10/22 19:24	16887-00-6	
Fluoride	<0.48	mg/L	1.6	0.48	5		05/10/22 19:24	16984-48-8	D3
Sulfate	3.7J	mg/L	10.0	2.2	5		05/10/22 19:24	14808-79-8	D3
		-							



ANALYTICAL RESULTS

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Date: 05/13/2022 01:21 PM

Sample: B-11R	Lab ID:	40244038003	Collected	: 04/26/2	2 13:15	Received: 04/	/28/22 08:20 M	atrix: Water	
Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6020B MET ICPMS	•	l Method: EPA 6			thod: El	PA 3010A			
	Pace Ana	alytical Services	- Green Bay						
Boron	2330	ug/L	100	30.3	10	05/02/22 06:14	05/11/22 12:56	7440-42-8	
Calcium	114000	ug/L	2540	762	10	05/02/22 06:14	05/11/22 12:56	7440-70-2	
Field Data	Analytica	l Method:							
	Pace Ana	alytical Services	- Green Bay						
Field pH	7.01	Std. Units			1		04/26/22 13:15		
Field Specific Conductance	934	umhos/cm			1		04/26/22 13:15		
Oxygen, Dissolved	0.07	mg/L			1		04/26/22 13:15	7782-44-7	
REDOX	-41.5	mV			1		04/26/22 13:15		
Turbidity	6.70	NTU			1		04/26/22 13:15		
Static Water Level	609.75	feet			1		04/26/22 13:15		
Temperature, Water (C)	10.4	deg C			1		04/26/22 13:15		
2540C Total Dissolved Solids	Analytica	l Method: SM 25	40C						
	Pace Ana	alytical Services	- Green Bay						
Total Dissolved Solids	560	mg/L	20.0	8.7	1		04/28/22 15:21		
9040 pH	Analytica	l Method: EPA 9	040						
	Pace Ana	alytical Services	- Green Bay						
pH at 25 Degrees C	6.9	Std. Units	0.10	0.010	1		04/28/22 14:21		H6
300.0 IC Anions	Analytica	l Method: EPA 3	0.00						
	Pace Ana	alytical Services	- Green Bay						
Chloride	18.0	mg/L	10.0	2.2	5		05/10/22 19:39	16887-00-6	
Fluoride	<0.48	mg/L	1.6	0.48	5		05/10/22 19:39		D3
Sulfate	58.1	mg/L	10.0	2.2	5		05/10/22 19:39		
		J							



ANALYTICAL RESULTS

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Date: 05/13/2022 01:21 PM

Sample: B-11A	Lab ID:	40244038004	Collected:	04/26/22	2 13:15	Received: 04/	28/22 08:20 M	atrix: Water	
Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6020B MET ICPMS	•	Method: EPA 6	•	ration Met	hod: EF	PA 3010A			
	Pace Ana	lytical Services	- Green Bay						
Boron	88.6	ug/L	10.0	3.0	1	05/02/22 06:14			
Calcium	51600	ug/L	254	76.2	1	05/02/22 06:14	05/11/22 04:45	7440-70-2	
Field Data	Analytical	Method:							
	-	lytical Services	- Green Bay						
Field pH	7.53	Std. Units			1		04/26/22 13:15		
Field Specific Conductance	633.7	umhos/cm			1		04/26/22 13:15		
Oxygen, Dissolved	0.15	mg/L			1		04/26/22 13:15	7782-44-7	
REDOX	0.3	mV			1		04/26/22 13:15		
Turbidity	0.00	NTU			1		04/26/22 13:15		
Static Water Level	610.00	feet			1		04/26/22 13:15		
Temperature, Water (C)	13.0	deg C			1		04/26/22 13:15		
2540C Total Dissolved Solids	Analytical	Method: SM 25	540C						
	Pace Ana	lytical Services	- Green Bay						
Total Dissolved Solids	350	mg/L	20.0	8.7	1		04/28/22 15:22		
9040 pH	Analytical	Method: EPA 9	040						
•	Pace Ana	lytical Services	- Green Bay						
pH at 25 Degrees C	7.7	Std. Units	0.10	0.010	1		04/28/22 14:26		H6
300.0 IC Anions	Analytical	Method: EPA 3	300.0						
	Pace Ana	lytical Services	- Green Bay						
Chloride	58.3	mg/L	2.0	0.43	1		05/10/22 19:54	16887-00-6	
Fluoride	<0.095	mg/L	0.32	0.095	1		05/10/22 19:54		
Sulfate	8.5	mg/L	2.0	0.44	1		05/10/22 19:54		



ANALYTICAL RESULTS

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Date: 05/13/2022 01:21 PM

Sample: B11-B	Lab ID:	40244038005	Collected:	04/26/22	2 12:15	Received: 04/	/28/22 08:20 M	atrix: Water	
Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6020B MET ICPMS	Analytical	l Method: EPA 6	020B Prepa	ration Met	hod: EF	PA 3010A			
	Pace Ana	llytical Services	- Green Bay						
Boron	2590	ug/L	100	30.3	10	05/02/22 06:14	05/11/22 13:04	7440-42-8	
Calcium	97100	ug/L	2540	762	10	05/02/22 06:14	05/11/22 13:04	7440-70-2	
Field Data	Analytical	Method:							
	Pace Ana	lytical Services	- Green Bay						
Field pH	7.63	Std. Units			1		04/26/22 12:15		
Field Specific Conductance	1432	umhos/cm			1		04/26/22 12:15		
Oxygen, Dissolved	0.22	mg/L			1		04/26/22 12:15	7782-44-7	
REDOX	45.4	mV			1		04/26/22 12:15		
Turbidity	0.00	NTU			1		04/26/22 12:15		
Static Water Level	609.98	feet			1		04/26/22 12:15		
Temperature, Water (C)	13.0	deg C			1		04/26/22 12:15		
2540C Total Dissolved Solids	Analytical	Method: SM 25	540C						
	Pace Ana	lytical Services	- Green Bay						
Total Dissolved Solids	1000	mg/L	20.0	8.7	1		04/28/22 15:22		
9040 pH	Analytical	Method: EPA 9	040						
	Pace Ana	lytical Services	- Green Bay						
pH at 25 Degrees C	7.8	Std. Units	0.10	0.010	1		04/29/22 11:25		H6
300.0 IC Anions	Analytical	Method: EPA 3	0.00						
	Pace Ana	lytical Services	- Green Bay						
Chloride	36.5	mg/L	10.0	2.2	5		05/10/22 20:08	16887-00-6	
Fluoride	<0.48	mg/L	1.6	0.48	5		05/10/22 20:08		
Sulfate	513	mg/L	40.0	8.9	20		05/11/22 15:18		



ANALYTICAL RESULTS

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Date: 05/13/2022 01:21 PM

Sample: B-26	Lab ID:	40244038006	Collected	l: 04/25/2	2 15:05	Received: 04	/28/22 08:20 M	atrix: Water	
Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6020B MET ICPMS	•	Method: EPA 6			thod: El	PA 3010A			
	Pace Ana	llytical Services	- Green Bay	/					
Boron	52.5	ug/L	10.0	3.0	1	05/02/22 06:14	05/11/22 05:00	7440-42-8	
Calcium	75900	ug/L	254	76.2	1	05/02/22 06:14	05/11/22 05:00	7440-70-2	
Field Data	Analytical	Method:							
	Pace Ana	lytical Services	- Green Bay	/					
Field pH	7.19	Std. Units			1		04/25/22 15:05		
Field Specific Conductance	826	umhos/cm			1		04/25/22 15:05		
Oxygen, Dissolved	10.44	mg/L			1		04/25/22 15:05	7782-44-7	
REDOX	252.4	mV			1		04/25/22 15:05		
Turbidity	0.30	NTU			1		04/25/22 15:05		
Static Water Level	610.12	feet			1		04/25/22 15:05		
Temperature, Water (C)	11.0	deg C			1		04/25/22 15:05		
2540C Total Dissolved Solids	Analytical	Method: SM 25	340C						
	Pace Ana	lytical Services	- Green Bay	/					
Total Dissolved Solids	470	mg/L	20.0	8.7	1		04/28/22 15:22		
9040 pH	Analytical	Method: EPA 9	040						
	Pace Ana	lytical Services	- Green Bay	/					
pH at 25 Degrees C	7.4	Std. Units	0.10	0.010	1		04/29/22 11:28		H6
300.0 IC Anions	Analytical	Method: EPA 3	00.0						
	Pace Ana	lytical Services	- Green Bay	/					
Chloride	45.3	mg/L	10.0	2.2	5		05/11/22 09:22	16887-00-6	
Fluoride	<0.48	mg/L	1.6	0.48	5		05/11/22 09:22	16984-48-8	D3,M0
Sulfate	34.2	mg/L	2.0	0.44	1		05/09/22 23:07	14808-79-8	•
		Ü							



ANALYTICAL RESULTS

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Date: 05/13/2022 01:21 PM

Sample: B-31R	Lab ID:	40244038007	Collected	: 04/25/22	2 17:00	Received: 04/	28/22 08:20 M	atrix: Water	
Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6020B MET ICPMS	•	Method: EPA	•		hod: EF	PA 3010A			
Boron Calcium	454 81100	ug/L ug/L	10.0 254	3.0 76.2	1 1	05/02/22 06:14 05/02/22 06:14	05/11/22 05:08 05/11/22 05:08		
Field Data	Analytical Pace Ana	Method: lytical Services	s - Green Bay						
Field pH Field Specific Conductance Oxygen, Dissolved REDOX Turbidity Static Water Level Temperature, Water (C)	6.77 728 0.38 -25.3 3.68 610.27 11.3	Std. Units umhos/cm mg/L mV NTU feet deg C			1 1 1 1 1 1		04/25/22 17:00 04/25/22 17:00 04/25/22 17:00 04/25/22 17:00 04/25/22 17:00 04/25/22 17:00 04/25/22 17:00	7782-44-7	
2540C Total Dissolved Solids	•	Method: SM 2 lytical Services							
Total Dissolved Solids 9040 pH	•	mg/L Method: EPA lytical Services		8.7	1		04/28/22 15:23		
pH at 25 Degrees C 300.0 IC Anions	•	Std. Units Method: EPA: lytical Services		0.010	1		04/29/22 11:33		H6
Chloride Fluoride Sulfate	36.0 <0.095 60.0	mg/L mg/L mg/L	2.0 0.32 2.0	0.43 0.095 0.44	1 1 1		05/09/22 23:51 05/09/22 23:51 05/09/22 23:51	16887-00-6 16984-48-8 14808-79-8	

(920)469-2436



ANALYTICAL RESULTS

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Date: 05/13/2022 01:21 PM

Sample: B-31A	Lab ID:	40244038008	Collected:	04/26/22	2 14:50	Received: 04/	28/22 08:20 M	atrix: Water	
Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6020B MET ICPMS	•	l Method: EPA 6	•	ration Met	hod: EF	PA 3010A			
Boron Calcium	198 55300	ug/L ug/L	10.0 254	3.0 76.2	1 1		05/11/22 05:15 05/11/22 05:15		
Field Data	Analytical Pace Ana	l Method: llytical Services	- Green Bay						
Field pH Field Specific Conductance Oxygen, Dissolved REDOX Turbidity Static Water Level Temperature, Water (C)	7.82 556 0.17 59.6 0.00 609.95	Std. Units umhos/cm mg/L mV NTU feet deg C			1 1 1 1 1 1		04/26/22 14:50 04/26/22 14:50 04/26/22 14:50 04/26/22 14:50 04/26/22 14:50 04/26/22 14:50 04/26/22 14:50	7782-44-7	
2540C Total Dissolved Solids	•	l Method: SM 25 llytical Services							
Total Dissolved Solids 9040 pH	•	mg/L I Method: EPA 9 alytical Services		8.7	1		04/28/22 15:24		
pH at 25 Degrees C 300.0 IC Anions	,	Std. Units I Method: EPA 3 Ilytical Services		0.010	1		04/29/22 11:38		H6
Chloride Fluoride Sulfate	56.0 0.22J 15.4	mg/L mg/L mg/L	2.0 0.32 2.0	0.43 0.095 0.44	1 1 1		05/10/22 00:06 05/10/22 00:06 05/10/22 00:06	16984-48-8	

(920)469-2436



ANALYTICAL RESULTS

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Date: 05/13/2022 01:21 PM

Sample: B-39	Lab ID:	40244038009	Collected:	04/25/22	2 13:00	Received: 04/	28/22 08:20 M	atrix: Water	
Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
6020B MET ICPMS	•	Method: EPA 6	•	ration Met	hod: EF	PA 3010A			
	Pace Ana	llytical Services	- Green Bay						
Boron	212	ug/L	10.0	3.0	1	05/02/22 06:14	05/11/22 05:22	7440-42-8	
Calcium	82000	ug/L	254	76.2	1	05/02/22 06:14	05/11/22 05:22	7440-70-2	
Field Data	Analytical	Method:							
	Pace Ana	lytical Services	- Green Bay						
Field pH	6.89	Std. Units			1		04/25/22 13:00		
Field Specific Conductance	554.1	umhos/cm			1		04/25/22 13:00		
Oxygen, Dissolved	0.18	mg/L			1		04/25/22 13:00	7782-44-7	
REDOX	220.4	mV			1		04/25/22 13:00		
Turbidity	1.49	NTU			1		04/25/22 13:00		
Static Water Level	610.22	feet			1		04/25/22 13:00		
Temperature, Water (C)	11.7	deg C			1		04/25/22 13:00		
2540C Total Dissolved Solids	Analytical	Method: SM 25	540C						
	Pace Ana	lytical Services	- Green Bay						
Total Dissolved Solids	306	mg/L	20.0	8.7	1		04/28/22 15:24		
9040 pH	Analytical	Method: EPA 9	040						
	Pace Ana	lytical Services	- Green Bay						
pH at 25 Degrees C	7.0	Std. Units	0.10	0.010	1		04/29/22 11:41		H6
300.0 IC Anions	Analytical	Method: EPA 3	0.00						
	Pace Ana	lytical Services	- Green Bay						
Chloride	0.63J	mg/L	2.0	0.43	1		05/10/22 20:53	16887-00-6	
Fluoride	<0.095	mg/L	0.32	0.095	1		05/10/22 20:53	16984-48-8	
Sulfate	6.3	mg/L	2.0	0.44	1		05/10/22 20:53	14808-79-8	



QUALITY CONTROL DATA

CCR RULE ALLIANT NELSON DEWEY Project:

Pace Project No.: 40244038

Boron

Date: 05/13/2022 01:21 PM

QC Batch: 414489 Analysis Method: EPA 6020B QC Batch Method: **EPA 3010A** Analysis Description: 6020B MET

> Laboratory: Pace Analytical Services - Green Bay

40244038001, 40244038002, 40244038003, 40244038004, 40244038005, 40244038006, 40244038007, Associated Lab Samples:

40244038008, 40244038009

METHOD BLANK: 2386892 Matrix: Water

40244038001, 40244038002, 40244038003, 40244038004, 40244038005, 40244038006, 40244038007, Associated Lab Samples:

40244038008, 40244038009

Blank Reporting Parameter Units Result Limit Analyzed Qualifiers ug/L <3.0 10.0 05/09/22 17:21 Calcium ug/L <76.2 05/11/22 02:55 254

LABORATORY CONTROL SAMPLE: 2386893

Description	11-26-	Spike	LCS	LCS	% Rec	0 170
Parameter	Units	Conc.	Result	% Rec	Limits	Qualifiers
Boron	ug/L	250	235	94	80-120	
Calcium	ug/L	10000	11400	114	80-120	

MATRIX SPIKE & MATRIX SF	PIKE DUPL	ICATE: 2386	894		2386895							
			MS	MSD								
		40244027001	Spike	Spike	MS	MSD	MS	MSD	% Rec		Max	
Parameter	Units	Result	Conc.	Conc.	Result	Result	% Rec	% Rec	Limits	RPD	RPD	Qual
Boron	ug/L	1100	250	250	1360	1350	100	99	75-125	0	20	
Calcium	ug/L	143000	10000	10000	156000	160000	129	163	75-125	2	20	P6



QUALITY CONTROL DATA

CCR RULE ALLIANT NELSON DEWEY Project:

Pace Project No.: 40244038

QC Batch: 414376 Analysis Method: SM 2540C

QC Batch Method: SM 2540C Analysis Description: 2540C Total Dissolved Solids

> Laboratory: Pace Analytical Services - Green Bay

> > 20.0

Associated Lab Samples: 40244038001, 40244038002, 40244038003, 40244038004, 40244038005, 40244038006, 40244038007,

40244038008, 40244038009

METHOD BLANK: 2385834 Matrix: Water

Associated Lab Samples:

40244038008, 40244038009

Blank Reporting Parameter Units Limit Qualifiers Result Analyzed **Total Dissolved Solids** mg/L 04/28/22 15:20

<8.7

LABORATORY CONTROL SAMPLE: 2385835

LCS LCS % Rec Spike Parameter Units Result % Rec Limits Qualifiers Conc. 98 **Total Dissolved Solids** mg/L 555 546 80-120

SAMPLE DUPLICATE: 2385836

40244039001 Dup Max **RPD RPD** Parameter Units Result Result Qualifiers **Total Dissolved Solids** 294 284 3 10 mg/L

SAMPLE DUPLICATE: 2385837

Date: 05/13/2022 01:21 PM

40244039002 Dup Max RPD RPD Parameter Units Result Result Qualifiers **Total Dissolved Solids** mg/L 300 318 6 10

(920)469-2436



QUALITY CONTROL DATA

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

QC Batch: 414369 Analysis Method: EPA 9040
QC Batch Method: EPA 9040 Analysis Description: 9040 pH

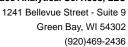
Laboratory: Pace Analytical Services - Green Bay

Associated Lab Samples: 40244038001, 40244038002, 40244038003, 40244038004

SAMPLE DUPLICATE: 2385790

Date: 05/13/2022 01:21 PM

40243933001 Dup Max Result Parameter Units RPD RPD Qualifiers Result 7.5 pH at 25 Degrees C 7.5 20 H6 Std. Units 0





QUALITY CONTROL DATA

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

QC Batch: 414440 Analysis Method: EPA 9040 QC Batch Method: EPA 9040 Analysis Description: 9040 pH

> Pace Analytical Services - Green Bay Laboratory:

 $40244038005,\,40244038006,\,40244038007,\,40244038008,\,40244038009$ Associated Lab Samples:

SAMPLE DUPLICATE: 2385789

Date: 05/13/2022 01:21 PM

40243975001 Dup Max Result Parameter Units RPD RPD Qualifiers Result 7.9 pH at 25 Degrees C 20 H6 Std. Units 8.0 0



QUALITY CONTROL DATA

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

QC Batch: 414946 QC Batch Method: EPA 300.0 Analysis Method:

EPA 300.0

Analysis Description:

300.0 IC Anions

Laboratory:

Pace Analytical Services - Green Bay

Associated Lab Samples: 40244038009

METHOD BLANK: 2389209

Date: 05/13/2022 01:21 PM

Matrix: Water

Associated Lab Samples: 40244038009

40244038009

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	<0.43	2.0	05/10/22 20:23	
Fluoride	mg/L	< 0.095	0.32	05/10/22 20:23	
Sulfate	mg/L	< 0.44	2.0	05/10/22 20:23	

LABORATORY CONTROL SAMPLE: 2389210

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	20	21.1	106	90-110	
Fluoride	mg/L	2	2.1	107	90-110	
Sulfate	mg/L	20	21.4	107	90-110	

MATRIX SPIKE & MATRIX SI	PIKE DUPL	ICATE: 2389	211		2389212							
		40243482001	MS Spike	MSD Spike	MS	MSD	MS	MSD	% Rec		Max	
5 .			- 1		_	_	_	_				
Parameter	Units	Result	Conc.	Conc.	Result	Result	% Rec	% Rec	Limits	RPD	RPD	Qual
Chloride	mg/L	5.2	20	20	25.3	25.6	101	102	90-110	1	15	
Fluoride	mg/L	< 0.095	2	2	2.1	2.2	106	108	90-110	2	15	
Sulfate	mg/L	1.4J	20	20	23.7	24.0	111	113	90-110	1	15	M0

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

(920)469-2436



QUALITY CONTROL DATA

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

QC Batch: 415066 Analysis Method: EPA 300.0

QC Batch Method: EPA 300.0 Analysis Description: 300.0 IC Anions

Laboratory: Pace Analytical Services - Green Bay

Associated Lab Samples: 40244038001, 40244038002, 40244038003, 40244038004, 40244038005

METHOD BLANK: 2389806 Matrix: Water

Associated Lab Samples: 40244038001, 40244038002, 40244038003, 40244038004, 40244038005

Blank Reporting Qualifiers Parameter Units Result Limit Analyzed Chloride mg/L < 0.43 2.0 05/10/22 16:11 Fluoride mg/L < 0.095 0.32 05/10/22 16:11 Sulfate mg/L 2.0 05/10/22 16:11 < 0.44

LABORATORY CONTROL SAMPLE: 2389807

Date: 05/13/2022 01:21 PM

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L		21.1	106	90-110	
Fluoride	mg/L	2	2.1	104	90-110	
Sulfate	mg/L	20	21.4	107	90-110	

MATRIX SPIKE & MATRIX SP	IKE DUPLI	CATE: 2389	808		2389809							
			MS	MSD								
		40243486002	Spike	Spike	MS	MSD	MS	MSD	% Rec		Max	
Parameter	Units	Result	Conc.	Conc.	Result	Result	% Rec	% Rec	Limits	RPD	RPD	Qual
Chloride	mg/L	0.82J	20	20	22.6	22.6	109	109	90-110	0	15	
Fluoride	mg/L	< 0.095	2	2	2.1	2.1	107	107	90-110	0	15	
Sulfate	mg/L	9.4	20	20	31.9	32.0	113	113	90-110	0	15	MO

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

(920)469-2436



QUALITY CONTROL DATA

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

LABORATORY CONTROL SAMPLE:

Fluoride

Sulfate

Date: 05/13/2022 01:21 PM

QC Batch: 415072 Analysis Method: EPA 300.0

QC Batch Method: EPA 300.0 Analysis Description: 300.0 IC Anions

Laboratory: Pace Analytical Services - Green Bay

Associated Lab Samples: 40244038006, 40244038007, 40244038008

METHOD BLANK: 2389899 Matrix: Water

2389900

Associated Lab Samples: 40244038006, 40244038007, 40244038008

mg/L

mg/L

Blank Reporting Qualifiers Parameter Units Result Limit Analyzed Chloride mg/L < 0.43 2.0 05/09/22 21:52 Fluoride <0.095 0.32 05/09/22 21:52 mg/L Sulfate mg/L 05/09/22 21:52 < 0.44 2.0

Spike LCS LCS % Rec
Parameter Units Conc. Result % Rec Limits Qualifiers

10

20

Chloride 20 21.1 106 90-110 mg/L Fluoride mg/L 2 2.1 104 90-110 Sulfate 20 mg/L 21.4 107 90-110

<0.48

34.2

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2389901 2389902 MS MSD 40244038006 MSD Spike Spike MS MS MSD % Rec Max Parameter Conc. Result % Rec % Rec **RPD** RPD Qual Units Result Conc. Result Limits Chloride 100 155 45.3 100 154 110 109 90-110 1 15 mg/L

10

20

11.5

56.1

11.5

56.3

115

109

115

110

90-110

90-110

0

0 15

15 M0

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.



QUALIFIERS

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above LOD.

J - Estimated concentration at or above the LOD and below the LOQ.

LOD - Limit of Detection adjusted for dilution factor, percent moisture, initial weight and final volume.

LOQ - Limit of Quantitation adjusted for dilution factor, percent moisture, initial weight and final volume.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected at or above the adjusted LOD.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

ANALYTE QUALIFIERS

Date: 05/13/2022 01:21 PM

D3 Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

H6 Analysis initiated outside of the 15 minute EPA required holding time.

M0 Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.

P6 Matrix spike recovery was outside laboratory control limits due to a parent sample concentration notably higher than the

spike level.



QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: CCR RULE ALLIANT NELSON DEWEY

Pace Project No.: 40244038

Date: 05/13/2022 01:21 PM

0244038002 B-7R EPA 3010A 414489 EPA 6020B 414596 0244038003 B-11R EPA 3010A 414489 EPA 6020B 414596 0244038004 B-11A EPA 3010A 414489 EPA 6020B 414596 0244038005 B11-B EPA 3010A 414489 EPA 6020B 414596 0244038006 B-26 EPA 3010A 414489 EPA 6020B 414596 0244038007 B-31R EPA 3010A 414489 EPA 6020B 414596 0244038008 B-31A EPA 3010A 414489 EPA 6020B 414596 0244038009 B-39 EPA 3010A 414489 EPA 6020B 414596 0244038001 B-1R EPA 3010A 414489 EPA 6020B 414596 0244038002 B-7R A14489 EPA 6020B 414596 0244038003 B-11R EPA 3010A 414489 EPA 6020B 414596 0244038004 B-11A SM 2540C 414376 414376 414376 414376	Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytica Batch
0244038003 B -11R EPA 3010A 414489 EPA 6020B 414596 0244038005 B 11-B EPA 3010A 414489 EPA 6020B 414596 0244038006 B -26 EPA 3010A 414489 EPA 6020B 414596 0244038007 B -31R EPA 3010A 414489 EPA 6020B 414596 0244038008 B -31A EPA 3010A 414489 EPA 6020B 414596 0244038009 B -39 EPA 3010A 414489 EPA 6020B 414596 0244038001 B -11R EPA 3010A 414489 EPA 6020B 414596 0244038002 B -7R EPA 3010A 414489 EPA 6020B 414596 0244038003 B -11R EPA 5010A 414376 414376 414376 0244038004 B -31A EPA 3010A 414376	10244038001	FIELD BLANK	EPA 3010A	414489	EPA 6020B	414596
0244038004 B-11A EPA 3010A 4114489 EPA 6020B 4114596 0244038005 B11-B EPA 3010A 4114489 EPA 6020B 414596 0244038006 B-26 EPA 3010A 4114489 EPA 6020B 414596 0244038007 B-31R EPA 3010A 4114489 EPA 6020B 414596 0244038009 B-39 EPA 3010A 411489 EPA 6020B 414596 0244038002 B-7R 0244038003 B-11R 0244038004 B-11A 0244038005 B11-B 0244038006 B-26 0244038009 B-39 024038006 B-26 0244038006 B-26 0244038009 B-39 024038009 B-39 024038000 B-31R 0244038000 B-31R 0244038000 B-31R 0244038000 B-31R 0244038000 B-39 0244038000 B-39 0244038000 B-39 0244038000 B-39 0244038000 B-31R 024038000 B-31R 024038000 B-31R 024038000 B-31R 024038000 B-31R 0240	0244038002	B-7R	EPA 3010A	414489	EPA 6020B	414596
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CHAIN-OF-CUSTODY / Analytical Request Document The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

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SAMPLE ID One Character per box. (A-Z, 0-9 /, -) Sample Ids must be unique	Soil/Solid SL 99	STAR SAMPLE TYPE DATE	TIME DATE	D D D D D D D D D D D D D D D D D D D	+	_	HNO3	HCI NaOH	Na2S2O3 Methanol	Other	Analyses Test	Boron/Calcium	TDS, CI, F, SO4	Hd				Posidual Chlorina (VIVI)			
1 FIELD BLANK	w	4/25 1	500	/	3	X	X					x l	$_{x}$	x		11	.		1 C	100	
2 B-7R	w	4/26 1	250		Π		1					x						П		07_	
3 B-11R	w	4/1/ 13	315	 	H	H^{-}	Π				Ì	×	\Box		Ħ	\top		$\top 1$		03	
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9 B-39	w	4/25 1	300		4	<u>'</u>		_		\perp		×	x	x L	$\sqcup \!\!\! \perp$			$\perp \! \! \perp \! \! \! \mid$	1	209	
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ADDITIONAL COMMENTS		OHIGHED DV (4 ==	LATION	DATE OF		ME S	3335	6.050	Accre	ED DY				14 (381%)		DATE	TIME	数 (ASA)XX	I CALIE!	E CONDITION	1034
ADDITIONAL COMMENTS	The contract of the contract o	QUISHED BY / AFF	ILIATION	DATE	Parket V	ME			ACCEP1	EU BY	AFF	ILIAT	ION	1,022	40	- DATE	IIME	6 31.46	SAMPL	E CONDITION	10
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			PRINT Name	なかりょく しょうにん しん			Ma	tzuk			અહેલું ફીં	¥4.85.	\$8.°			u Transili	al e i disende de la	i. S	no be/	à	se
			SIGNATURE of	of SAMPLER	<u>''\</u>	2			•		Т	D	ATE	Signed	1: 11/	17/22		EMP in	eceived	ustody saled ooler	N am bl

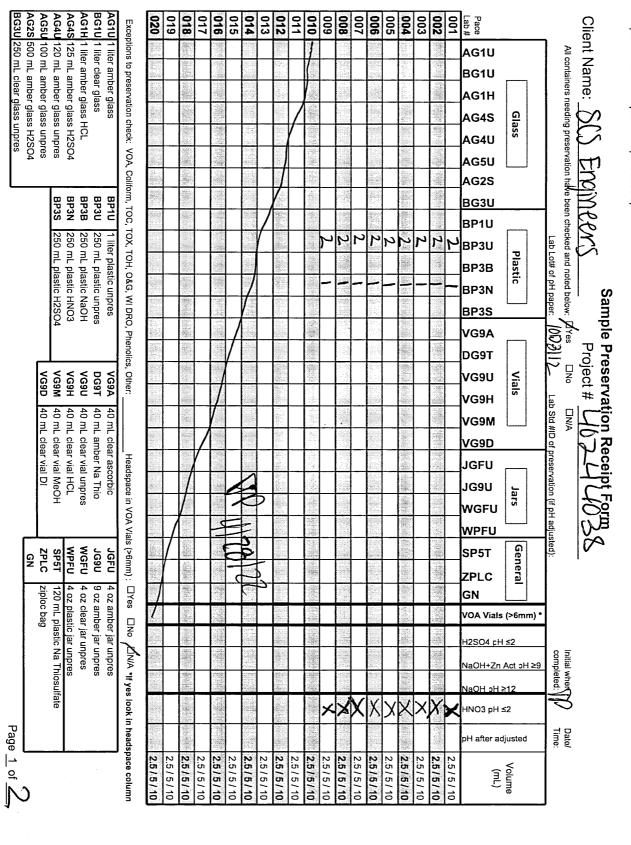
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Table 2. Sampling Points and Parameters - CCR Rule Sampling Program Detection Monitoring Groundwater Monitoring - Nelson Dewey Generating Station / SCS Engineers Project #25221071

	Parameter	B7R	B11R	B11A	B11B	B26	B31R	B31A	B39	Field Blank	TOTAL
	Boron	x	х	х	x	x	×	х	x	×	9
] ≡ છ	Calcium	х	x	×	x	×	×	х	×	×	9
<u>≍</u>	Chloride	х	х	х	×	× .	×	х	х	×	9
	Fluoride	х	x	х	х	. х	×	×	×	×	9
Appendix III Parameters	рН	x	x	x	×	×	×	×	×	×	9
A G	Sulfate	x	x	x	x	×	х	х	×	×	9
	TDS	×	x	х	x	×	×	x	х	×	9
	Antimony										0
	Arsenic										0
	Barium				•						0
) STS	Beryllium										0
et	Cadmium										0
a a	Chromium										0
ar	Cobalt										0
>	Fluoride										0
<u>×</u>	Lead										0
<u> </u>	Lithium								-		0
Appendix IV Parameters	Mercury										0
Ā	Molybdenum							÷			0
	Selenium										0
1	Thallium										0
	Radium										0
										10.200	5 8 5
	Groundwater	x	x	х	x	x	, X	×	×		
	Elevation	Ŷ	^	^_	^	^	^	^	`		8
	Well Depth	x	x	Χ.	x	×	x	x	×		8.
δ.	pH (field)	x	x	×	×	x	x	x	×		8
Field Parameters	Specific	x	x	х	х	x	x	x	x		
Ĕ	Conductance					^	^	^	^		8
are	Dissolved	×	×	×	×	x	x	×	x		
р П	Oxygen	7									8
<u>ie</u>	ORP	×	×	×	x	x	×	x	x		8
"-	Temperature	×	×	×	X ·	x	×	x	×		8
	Turbidity	×	×	×	×	×	×	×	x		8
	Color	x	×	×	×	x	x	×	×		8
	Odor	x	×	x	×	x	х	х	x		8

Notes:

I:\25221071.00\Data and Calculations\Field Work Requests\[WPL_ND_CCR_Rule_Sampling_Detection Monitorin



DC#_Title: ENV-FRM-GBAY-0014 v02_SCUR Revision: 3 | Effective Date: | Issued by: Green Bay

Sample Condition Upon Receipt Form (SCUR)

Client Name: SCS Engineer Courier: CS CS Logistics Fed Ex Specific Pace Other: Tracking #:	edee 🗆 UPS 🗆 W		JO# : 0244038	40244038
Custody Seal on Cooler/Box Present: yes	no Seals intact:	yes 🗀 no		
Custody Seal on Samples Present: yes	3	☐ yes ☐ no		
Packing Material: 🔲 Bubble Wrap 🗀 Bu	ubble Bags 🖊 Non	e 🔲 Other		
Thermometer Used SR - 1/7	Type of Ice: Wet		Z Samples o	on ice, cooling process has begun
Cooler Temperature Uncorr: / Corr:	20	·		Person examining contents:
Temp Blank Present:	Biological 1	Tissue is Frozen: 🔲 y	′es 🔲 no	Date: 4/10/9/Initials:
Temp should be above freezing to 6°C. Biota Samples may be received at ≤ 0°C if shipped on	Dry Ice.			Labeled By Initials:
Chain of Custody Present:	✓Yes □No □N/A	1.		•
Chain of Custody Filled Out:	ZÍYes □No □N/A	2.		
Chain of Custody Relinquished:	ŽiYes □No □N/A	3.		
Sampler Name & Signature on COC:	✓Yes □No □N/A	4.		
Samples Arrived within Hold Time:	∠ Yes □No	5.		
- VOA Samples frozen upon receipt	□Yes □No	Date/Time:		
Short Hold Time Analysis (<72hr):	□Yes DNo	6.		
Rush Turn Around Time Requested:	□Yes ZNo	7.		
Sufficient Volume:		8.		
	SD: □Yes ØNo □N/A			
Correct Containers Used:	Yes □No	9.		
-Pace Containers Used:	✓Yes □No □N/A			
-Pace IR Containers Used:	□Yes □No ZÎN/A			
Containers Intact:	ØYes □No	10.		:
Filtered volume received for Dissolved tests	□Yes □No ØN/A	11.		
Sample Labels match COC:	ZYes □No □N/A	12.		
-Includes date/time/ID/Analysis Matrix:	ίν)			
Trip Blank Present:	□Yes □No ØN/A	13.		
Trip Blank Custody Seals Present	□Yes □No □N/A			
Pace Trip Blank Lot # (if purchased):				
Client Notification/ Resolution:			ked, see attac	hed form for additional comments
Person Contacted:	Date/	Time:		
Comments/ Resolution:				
				·
PM Review is documented electronically in L	Ms. By releasing the	project, the PM acknow	wledges the	ey have reviewed the sample I

Qualtrax Document ID: 41292

Pace Analytical Services, LLC

Appendix D Historical Monitoring Results

Number of Sampling Dates Parameter Name	Units	12/9/2015	4/13/2016	7/18/2016	10/19/2016	1/12/2017	4/17/2017	6/7/2017	8/1/2017	10/19/2017	4/2/2018	10/9/2018	4/22/2019	10/14/2019	4/13/2020	10/13/2020	4/20/2021	10/7/2021	4/26/202
Boron	ug/L	110	115	164	154	159	129	110	129	159	121	73	93.5	139	96	145	104		98.1
Calcium	ug/L	31700	42300	44400	56600	56700	61400	51600	50400	56200	49200	38500	59400	57700	58700	41900	56100		59200
Chloride	mg/L	45.2	4.6	7.1	22	19.7	13.1	12.8	8.1	12	10.1	1.9	10.9	11.5	14.3	6.7	9.5		12
Fluoride	mg/L	<1	<0.2	<0.2	<0.5	<0.5	<0.5	<0.5	<0.1	<0.5	<0.5	<0.1	<0.5	<0.5	<0.48	<0.48	<0.48		<0.48
Field pH	Std. Units	6.74	6.8	6.29	6.55	7.43	6.6	6.65	6.28	6.88	6.57	6.23	6.63	6.62	6.6	6.35	6.54		6.43
Sulfate	mg/L	17	2.5	2.4	<5	<5	<5	<5	3.7	<5	<5	3.2	<5	<5	7.5	<2.2	<2.2		3.7
Total Dissolved Solids	mg/L	198	218	220	288	240	278	240	220	242	220	186	254	208	306	208	248		318
Antimony	ug/L	0.28	<0.073	0.25	0.086	0.2	0.18	<0.15	0.33		<0.15								
Arsenic	ug/L	5	2	1.8	5.7	6.6	3.5	2.6	2		2.6								
Barium	ug/L	77.8	67.8	54.5	78.8	98.4	83.3	65.8	54.2		89.3								
Beryllium	ug/L	<0.13	<0.13	<0.13	<0.13	0.16	<0.13	<0.18	<0.18		<0.18								
Cadmium	ug/L	0.17	<0.089	<0.089	0.13	0.16	0.11	<0.081	0.23		<0.081								
Chromium	ug/L	0.5	<0.39	<0.39	<0.39	0.62	0.41	<1	<1		<1								-
Cobalt	ug/L	1.3	0.88	0.69	1.8	1.5	1.4	1.1	1.3		0.42								
Lead	ug/L	0.21	0.16	0.078	0.14	0.42	0.26	<0.2	0.29		<0.2								
Lithium	ug/L	0.45	0.14	0.18	0.23	0.35	0.26	<0.14	0.41		0.22								
Mercury	ug/L	<0.1	<0.18	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13		<0.13								-
Molybdenum	ug/L	9.6	1.4	1.4	4.3	3.3	2.1	2.8	1.9		0.84								-
Selenium	ug/L	0.44	0.24	0.26	0.23	0.47	0.39	<0.32	0.56		<0.32								-
Thallium	ug/L	0.2	<0.14	<0.14	<0.14	<0.14	0.22	<0.14	0.36		<0.14								-
Total Radium	pCi/L	0.933	1.18	0.598	0.118	0.828	0.747	0.181	0.967		0.339								-
Radium-226	pCi/L	0.341	0.436	-0.089	-0.243	-0.253	0.345	0.181	0.379		0.339								-
Radium-228	pCi/L	0.592	0.746	0.598	0.118	0.828	0.402	-0.057	0.588		-0.032								
Field Specific Conductance	umhos/cm	367.8	410.9	422.3	583.4	1054	532	303	411.8	480.9	342.5	336	603.7	576.6	623.8	414.4	535		614.1
Oxygen, Dissolved	mg/L	4.88	1.29	0.55	0.37	0.1	0.1	0.22	0.47	0.31	0.3	1.24	0.17	0.11	2.18	1.68	0.19		0.82
Field Oxidation Potential	mV	-48.2	-46.1	-26.6	137.3	-122.2	-83.3	-12.6	-3	112.8	-74.1	54.5	-100.9	-132.2	-124	142.1	-23.4		-86.1
Groundwater Elevation	feet	606.69	609.32	606.54	608.59	604.94	609.08	610.74	607.02	609.6	604.82	610.76	615.28	613.43	614.12	605.09	608.83	604.05	609.84
Temperature	deg C	13.9	11.7	15.1	16	11.7	10.9	13.5	16.5	16	9.2	16.3	10.5	15.2	8.2	13.7	9.3		8.5
Turbidity	NTU		4.8	4.3	2.22	2.69	3.53	3.28	1.31	3	4.17	29.56	17.05	4.25	8.2	54.78	0.99		3.56
pH at 25 Degrees C	Std. Units	6.3	6.5	6.4	7.1	6.6	6.8	7.7	6.6	6.6	6.8	6.6	6.6	6.9	6.6	6.4	6.6		6.6

Location ID:	B-11A																		
Number of Sampling Dates																			
Parameter Name	Units	12/9/2015	4/13/2016	7/19/2016	10/19/2016	1/12/2017	4/17/2017	6/8/2017	8/1/2017	10/19/2017	4/2/2018	10/9/2018	4/22/2019	10/14/2019	4/13/2020	10/12/2020	4/19/2021	10/7/2021	4/26/202
Boron	ug/L	124	116	104	112	106	100	102	105	116	91	94.2	93.9	80.7	86.3	99.3	88.1	85.4	88.6
Calcium	ug/L	58800	60100	54000	54600	54500	54800	57800	54500	55000	53300	48600	60400	56600	57500	55600	50600	51400	51600
Chloride	mg/L	40.4	43	46.6	46.5	46.6	45.4	46.9	46.7	49.9	54.7	57.8	83.6	96.6	93.7	65.3	59.1	58.8	58.3
Fluoride	mg/L	0.3	0.38	0.35	0.36	0.43	0.36	0.37	0.37	0.32	0.24	0.29	0.29	0.26	0.27	0.28	0.23	0.22	<0.095
Field pH	Std. Units	7.7	7.75	7.42	7.47	7.89	7.38	7.78	7.67	7.96	8.04	7.43	7.62	7.66	7.75	7.74	7.65	7.57	7.53
Sulfate	mg/L	3.2	3.8	2.7	3	2.3	<1	1.4	2.4	5.1	12.3	6	1.9	<1	1.4	1	2.9	7	8.5
Total Dissolved Solids	mg/L	338	362	336	340	322	326	338	326	322	336	332	386	348	394	364	366	356	350
Antimony	ug/L	0.42	0.14	0.17	0.44	0.22	0.51	<0.15	0.27		<0.15								
Arsenic	ug/L	0.27	0.19	0.18	0.51	0.19	0.4	<0.28	<0.28		<0.28								
Barium	ug/L	202	206	171	181	187	192	194	184		170								
Beryllium	ug/L	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.18	<0.18		<0.18								
Cadmium	ug/L	<0.089	<0.089	<0.089	0.26	<0.089	0.24	<0.081	<0.081		<0.081								-
Chromium	ug/L	<0.39	<0.39	<0.39	<0.39	0.46	0.52	<1	<1		<1								
Cobalt	ug/L	1.3	1.4	0.97	1.3	1.2	1.4	1.1	1.3		1.1								
Lead	ug/L	0.083	<0.04	<0.04	0.34	<0.04	0.33	<0.2	<0.2		<0.2								-
Lithium	ug/L	5.9	6.1	5.8	5.9	5.9	5.9	6.1	4.9		5.1								-
Mercury	ug/L	<0.1	<0.18	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13		<0.13								
Molybdenum	ug/L	22.7	24.1	22.5	21.8	21.8	22.4	22.2	20		18.2								-
Selenium	ug/L	<0.21	<0.21	<0.21	0.27	<0.21	0.36	<0.32	<0.32		<0.32								
Thallium	ug/L	0.14	<0.14	<0.14	0.5	<0.14	0.46	<0.14	0.15		<0.14								-
Total Radium	pCi/L	1.08	1.48	0.937	0.95	0.845	1.4	1.88	0.917		0.848								-
Radium-226	pCi/L	0.579	0.148	0.179	0.172	0	0.948	0.454	0.0728		0.405								
Radium-228	pCi/L	0.503	1.33	0.758	0.778	0.845	0.447	1.43	0.844		0.443								
Field Specific Conductance	umhos/cm	660	658	598.1	631	1049	583.3	407.9	588.8	519.1	481.9	654	721	708	720	674	638	621	633.7
Oxygen, Dissolved	ma/L	0.49	0.03	0.08	0.37	0.19	0.11	0.23	0.1	0.51	0.12	0.08	0.07	0.14	0.19	0.09	0.21	1.27	0.15
Field Oxidation Potential	mV	9.8	-31.2	84.2	-76.8	-88.3	-103.6	31.4	-44.1	112.1	-42.1	-47.9	218.3	-59	-31	55.1	135.4	61.4	0.3
Groundwater Elevation	feet	606.3	608.71	606.76	608.21	604.36	609.05	609.81	605.57	609.58	606.63	610.28	615.29	613.29	613.88	604.54	608.72	603.79	610
Temperature	deg C	14.8	14.8	14.8	14.9	14.2	14.4	14.3	14.7	14.9	13.9	15	13.8	14.3	13.4	14.2	13.4	13.9	13
Turbidity	NTU		0.23	0.01	0.15	0.21	0.51	0.39	0.12	0.78	0.5	3.15	0	2.58	0	0	0	0	0
pH at 25 Degrees C	Std. Units	7.4	7.5	7.5	7.9	7.7	7.7	7.7	7.7	7.6	7.8	7.7	7.7	7.8	7.6	7.7	7.7	8	7.7
pH at 25 Degrees C	Std. Units	7.4	7.5	7.5	7.9	1.1	1.1	1.7	1.1	7.6	7.8	1.1	1.1	7.8	7.6	7.7	1.1	8	

Number of Sampling Dates																				T
Parameter Name	Units	12/9/2015	4/13/2016	7/19/2016	10/20/2016	1/12/2017	4/17/2017	6/8/2017	8/1/2017	10/19/2017	4/2/2018	10/9/2018	11/12/2018	4/22/2019	10/14/2019	4/13/2020	10/12/2020	4/19/2021	10/7/2021	4/26/2022
Boron	ug/L	1140	1360	1210	1460	1540	1760	1880	1800	1500	2020	3620		6830	4630	5380	3350	4440	2480	2590
Calcium	ug/L	64100	65400	59000	59100	63900	67400	68200	61400	52400	59000	66300		83300	91400	115000	91200	93400	100000	97100
Chloride	mg/L	31.2	32.7	33.6	34.3	36.1	36.3	33.9	35.9	36.1	31.3	21.9		28.4	32.3	30.9	33.4	28.3	39.6	36.5
Fluoride	mg/L	0.44	0.49	0.45	0.53	0.52	0.58	0.59	0.6	0.59	0.65	0.61		0.64	0.62	<0.95	<0.095	0.36	<0.95	<0.48
Field pH	Std. Units	8.06	8.14	7.77	7.91	8.18	7.83	8.07	7.77	7.77	8.42	7.74	8.05	7.91	7.92	7.89	7.8	8.07	7.81	7.63
Sulfate	mg/L	134	148	165	178	182	181	191	179	175	200	197		303	339	378	388	379	466	513
Total Dissolved Solids	mg/L	494	512	520	496	488	502	516	498	510	550	602	594	742	728	872	906	910	884	1000
Antimony	ug/L	0.32	<0.073	0.097	0.21	0.12	0.098	<0.15	<0.15		<0.15									
Arsenic	ug/L	0.67	0.38	0.36	0.52	0.4	0.47	<0.28	<0.28		0.29									-
Barium	ug/L	147	153	128	130	145	151	151	132		128									-
Beryllium	ug/L	<0.13	<0.13	<0.13	<0.25	<0.13	<0.13	<0.18	<0.18		<0.18									
Cadmium	ug/L	0.23	<0.089	<0.089	0.18	<0.089	<0.089	<0.081	<0.081		<0.081									
Chromium	ug/L	0.7	0.74	<0.39	<0.39	<0.39	0.45	<1	<1		<1									
Cobalt	ug/L	0.44	0.23	0.21	0.38	0.3	0.29	0.26	0.2		0.17									
Lead	ug/L	0.45	<0.04	<0.04	0.36	0.083	0.061	<0.2	<0.2		<0.2									
Lithium	ug/L	21.7	21.3	18.4	19.8	20	19.5	19.4	17		15.4									-
Mercury	ug/L	<0.1	<0.18	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13		<0.13									-
Molybdenum	ug/L	46.2	51.7	48.7	48.1	52.6	53.8	55.1	55.9		77.7									-
Selenium	ug/L	0.46	<0.21	<0.21	0.28	<0.21	<0.21	<0.32	<0.32		<0.32									
Thallium	ug/L	0.35	<0.14	<0.14	0.32	<0.14	<0.14	0.16	<0.14		0.16									-
Total Radium	pCi/L	0.862	1.69	0.977	0.534	0.787	0.643	1.05	2.21		1.02									-
Radium-226	pCi/L	0.733	0.0581	0.284	-0.487	-0.434	0.193	0.389	0.766		0.518									
Radium-228	pCi/L	0.129	1.63	0.693	0.534	0.787	0.45	0.661	1.44		0.505									
Field Specific Conductance	umhos/cm	631	808	785	807	1342	799	534.3	776	709	671	954	863	1129	1132	1280	1348	1286	1337	1432
Oxygen, Dissolved	mg/L	0.84	0.04	0.08	0.3	0.16	0.09	0.28	0.13	0.22	0.59	0.13	0.16	0.09	0.19	0.24	0.22	0.13	1.29	0.22
Field Oxidation Potential	mV	-50.9	-66.9	-69	-114.5	-135.7	-121.3	36.2	-81.1	93.7	116.3	13.2	45.8	207.8	-48.9	-57.9	225	44.7	46.9	45.4
Groundwater Elevation	feet	606.26	608.68	606.74	608.19	604.32	608.99	610.08	605.5	609.65	606.55	610.24	609.14	615.28	613.18	613.86	604.44	608.67	603.74	609.98
Temperature	deg C	14.4	14.3	14.6	14.6	14.1	14.2	14.1	14.5	14.8	13.5	14.8	14.1	13.6	14.3	13.5	14.3	13.4	14	13
Turbidity	NTU		0.21	0.01	0.33	0.38	0.36	0.7	0.07	1.01	0.78	2.98	2.65	0	1.5	0	0	0	0	0
pH at 25 Degrees C	Std. Units	7.7	7.8	7.8	8	7.9	7.9	8.1	7.9	7.7	8.1	7.9		7.9	7.8	7.8	7.9	8	8	7.8

Location ID:	B-11R																		
Number of Sampling Dates	: 18																		
Parameter Name	Units	12/9/2015	4/13/2016	7/19/2016	10/20/2016	1/12/2017	4/17/2017	6/7/2017	8/1/2017	10/19/2017	4/2/2018	10/9/2018	4/22/2019	10/14/2019	4/13/2020	10/12/2020	4/19/2021	10/7/2021	4/26/2022
Boron	ug/L	4170	3410	3530	4120	3530	3520	3420	2040	3120	3180	576	1360	1440	2140	2870	3010	2940	2330
Calcium	ug/L	126000	141000	130000	128000	126000	123000	128000	139000	117000	124000	49900	82400	66000	117000	120000	115000	119000	114000
Chloride	mg/L	39.2	7	38.9	39.1	42.3	40.2	42	24.7	38.8	36.8	5.9	12.6	13.1	22.5	20.7	27.2	23.1	18
Fluoride	mg/L	<1	<0.2	0.22	<0.5	<0.5	<0.5	<0.5	0.25	<0.5	<0.5	0.15	0.2	0.26	<0.48	<0.48	<0.48	<0.48	<0.48
Field pH	Std. Units	7.07	6.78	6.69	6.77	6.98	7.11	6.8	6.7	7.22	7.14	6.55	6.82	6.83	6.8	6.83	7.11	6.86	7.01
Sulfate	mg/L	75.4	18.4	115	118	108	108	98.2	126	97.7	88.1	15.1	34.6	40.7	41.9	22.8	61.2	61.8	58.1
Total Dissolved Solids	mg/L	616	682	698	660	616	620	630	738	586	638	266	406	310	570	600	578	576	560
Antimony	ug/L	<0.073	<0.073	<0.073	0.22	<0.073	<0.073	<0.15	0.42		<0.15								-
Arsenic	ug/L	14.8	7	10.6	7.4	7.1	6.9	6.1	7.5		9.3								-
Barium	ug/L	204	169	187	159	144	149	152	168		144								-
Beryllium	ug/L	<0.13	<0.13	<0.13	0.36	<0.13	<0.13	<0.18	<0.18		<0.18								-
Cadmium	ug/L	<0.089	<0.089	<0.089	0.15	<0.089	<0.089	<0.081	0.32		<0.081								-
Chromium	ug/L	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	<1	<1		<1								-
Cobalt	ug/L	0.36	0.54	0.68	1	1.2	1.3	1.5	1.4		0.94								
Lead	ug/L	0.21	<0.04	0.13	0.19	<0.04	0.12	<0.2	0.39		<0.2								
Lithium	ug/L	2.3	1.5	1.6	2	1.4	1.4	1.3	2		1.6								-
Mercury	ug/L	<0.1	<0.18	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13		<0.13								-
Molybdenum	ug/L	15.1	23.2	34.9	43.8	42.8	57.2	53.8	22.7		35.6								-
Selenium	ug/L	1.2	5	<0.21	0.3	<0.21	<0.21	<0.32	0.78		<0.32								-
Thallium	ug/L	<0.14	<0.14	<0.14	0.5	<0.14	<0.14	<0.14	0.47		<0.14								-
Total Radium	pCi/L	1.45	1.62	0.953	1.51	0.345	1.45	2.1	1.43		0.749								-
Radium-226	pCi/L	0.797	0.863	0.19	0.516	0	0.719	0.272	0.602		0.254								-
Radium-228	pCi/L	0.653	0.757	0.763	0.997	0.345	0.732	1.83	0.826		0.495								-
Field Specific Conductance	umhos/cm	931	1172	1160	1139	1876	1020	721	1192	870	839	463.2	737	612	993	1125	1003	1029	934
Oxygen, Dissolved	mg/L	2.47	0.03	0.08	0.34	0.14	0.11	0.21	0.1	0.19	0.09	0.34	0.37	0.1	0.22	0.14	0.1	1.57	0.07
Field Oxidation Potential	mV	-114.2	-91	-94.7	-113.2	-72.9	-53.3	-26.8	-41.3	133.4	-128.6	-49.5	-20.9	-4.7	-75.8	-139.8	-64.5	-42.6	-41.5
Groundwater Elevation	feet	606.71	609.32	606.14	608.35	604.57	608.34	610.42	606.73	609.42	606.27	610.67	615.28	613.06	614.39	604.57	608.57	603.85	609.75
Temperature	deg C	14.5	10.9	14	15.5	12.7	11.7	11.9	14.4	15.1	11.1	16.2	10	14.5	10.1	14.3	10.6	14.6	10.4
Turbidity	NTU		3.18	2.11	1.66	2.51	3.85	1.72	1.04	2.5	3.58	10.05	8.88	7.5	8.97	6.58	8.4	10.81	6.7
pH at 25 Degrees C	Std. Units	6.9	6.8	6.8	7.3	6.9	7.2	7.1	6.9	6.8	7	6.9	6.9	7	6.8	7	7	7.3	6.9

Location ID:	B-26																		
Number of Sampling Dates																			
Parameter Name	Units	12/9/2015	4/12/2016	7/19/2016	10/20/2016	1/12/2017	4/17/2017	6/7/2017	8/2/2017	10/19/2017	4/3/2018	10/8/2018	4/23/2019	10/15/2019	4/14/2020	10/13/2020	4/21/2021	10/8/2021	4/25/2022
Boron	ug/L	29.6	33.7	28.6	33	35.2	50.1	45.8	54.6	47.4	48	53.4	41.6	<3	66.1	63.6	63.6	48.4	52.5
Calcium	ug/L	81300	86200	82400	82700	89400	89000	105000	98100	102000	88100	78700	75300	<76.2	88500	76500	78700	84900	75900
Chloride	mg/L	45.5	51.3	55.6	52.8	54.5	56	59.6	52.6	79.3	54.4	33.2	40.8	30.5	54.9	35.3	42.6	39.1	45.3
Fluoride	mg/L	<0.2	<0.2	<0.2	0.13	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.11	<0.095	<0.095	<0.095	<0.48
Field pH	Std. Units	7.35	7.43	7.14	7.19	7.57	7.54	7.22	7.21	7.5	7.64	7.2	7.1	7.24	7.27	7.34	7.27	7.18	7.19
Sulfate	mg/L	37.1	38	36.2	35	35	32.4	31	28.5	25.3	19.1	25.1	26.7	36	30.2	37	35.3	43.8	34.2
Total Dissolved Solids	mg/L	424	456	504	466	446	468	538	496	542	464	450	458	404	464	448	470	440	470
Antimony	ug/L	0.075	<0.073	0.16	0.2	0.24	0.087	<0.15	<0.15		<0.15								
Arsenic	ug/L	0.49	0.54	0.49	0.59	0.6	0.5	0.39	0.5		0.36								
Barium	ug/L	73.7	81.8	77.8	81.2	89.2	91	107	100		91.5								
Beryllium	ug/L	<0.13	<0.13	<0.13	<0.13	0.13	<0.13	<0.18	<0.18		<0.18								
Cadmium	ug/L	<0.089	<0.089	<0.089	0.13	0.15	<0.089	<0.081	<0.081		0.085								-
Chromium	ug/L	0.94	4.1	1.1	0.83	1	1.1	<1	<1		<1								-
Cobalt	ug/L	0.17	0.13	0.086	0.21	0.25	0.13	<0.085	0.13		<0.085								
Lead	ug/L	0.057	<0.04	<0.04	0.15	0.2	0.079	<0.2	<0.2		0.3								
Lithium	ug/L	2.1	2.1	1.9	2.2	2.5	2.1	2.2	2		2.1								
Mercury	ug/L	<0.1	<0.18	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13		<0.13								
Molybdenum	ug/L	0.19	0.5	0.15	0.39	0.34	0.2	<0.44	<0.44		<0.44								
Selenium	ug/L	0.69	0.67	0.98	1.1	0.99	1.5	1.5	1.4		1.4								
Thallium	ug/L	<0.14	<0.14	<0.14	0.27	0.16	<0.14	<0.14	<0.14		<0.14								
Total Radium	pCi/L	1.22	0.773	0.416	0.713	0.672	0.867	0.646	0.681		0.449								
Radium-226	pCi/L	0.404	-0.058	-0.089	0.353	0	0.398	0.124	0.224		0.261								
Radium-228	pCi/L	0.82	0.773	0.416	0.36	0.672	0.469	0.522	0.457		0.188								-
Field Specific Conductance	umhos/cm	567	783	788	823	1394	800	575.9	836	786	655.2	661.9	815	753	852	782	778	788	826
Oxygen, Dissolved	mg/L	5.88	5.3	4.41	6.25	5.58	7.79	2.92	6.8	8.49	2.68	5.98	8.73	12.17	8.43	7.2	8.74	9.4	10.44
Field Oxidation Potential	mV	14.3	130.2	63.2	68.9	59.1	148.4	53.4	155.9	215.6	69.7	109.2	259.9	175.8	160.4	242.6	105.8	122.1	252.4
Groundwater Elevation	feet	606.8	609.81	606.09	608.84	604.52	608.59	611.25	607.39	608.84	606.49	610.34	615.49	613.1	613.76	604.92	608.55	604.21	610.12
Temperature	deg C	11.1	10.9	10.7	11.3	11.5	11.1	10.9	11.3	11.7	11.3	12	11.4	11.6	11.3	11.9	11	11.4	11
Turbidity	NTU		0.27	0.27	0.37	0.14	0.56	0.44	0.15	0.89	0.99	3.44	0	1.5	0	0	0	0	0.3
pH at 25 Degrees C	Std. Units	7.2	7.4	7.2	7.7	7.6	7.5	7.5	7.3	7.4	7.3	7.3	7.4	7.4	7.2	7.4	7.4	7.7	7.4

Location ID:	B-31A																		
Number of Sampling Dates																			
Parameter Name	Units	12/9/2015	4/13/2016	7/19/2016	10/20/2016	1/12/2017	4/17/2017	6/8/2017	8/1/2017	10/19/2017	4/2/2018	10/9/2018	4/22/2019	10/14/2019	4/13/2020	10/12/2020	4/19/2021	10/7/2021	4/26/2022
Boron	ug/L	59	79.2	67.2	63.7	76.4	69.9	58.5	56.3	63.9	74.8	71.8	86.2	98.5	132	127	172	178	198
Calcium	ug/L	48400	51900	48900	45800	46600	46900	49400	46000	49600	49300	46600	48200	52200	50900	47700	52100	53500	55300
Chloride	mg/L	35.3	35.8	36.4	39	39.9	40.3	40.9	40.8	40.8	42.7	40.2	40.8	47.1	51	57.9	64.8	60.3	56
Fluoride	mg/L	<0.2	0.22	<0.2	0.18	0.22	0.19	0.18	0.2	0.16	0.13	0.17	0.22	0.22	0.19	0.18	0.14	0.15	0.22
Field pH	Std. Units	7.65	7.63	7.25	7.54	7.82	7.83	7.74	7.56	7.92	8	7.48	7.61	7.69	7.71	7.78	7.9	7.44	7.82
Sulfate	mg/L	26.2	22.6	24.2	27.2	29.8	31	31.2	26.6	26.1	27.4	24.8	21.6	22.3	16.6	16.8	15.8	14.9	15.4
Total Dissolved Solids	mg/L	274	302	280	292	284	318	296	284	290	282	278	284	272	298	300	330	294	316
Antimony	ug/L	<0.073	<0.073	0.14	0.084	<0.073	<0.073	<0.15	<0.15		<0.15								-
Arsenic	ug/L	1.6	1.6	1.4	1.5	1.5	1.3	1.3	1.2		1.3								-
Barium	ug/L	132	147	130	128	146	146	150	133		139								-
Beryllium	ug/L	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.18	<0.18		<0.18								-
Cadmium	ug/L	<0.089	<0.089	<0.089	<0.089	<0.089	<0.089	<0.081	<0.081		<0.081								-
Chromium	ug/L	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	9.4	<1		<1								-
Cobalt	ug/L	2.2	2.3	1.8	1.8	2	1.9	2.2	1.8		1.8								-
Lead	ug/L	0.08	<0.04	<0.04	0.05	<0.04	0.36	<0.2	<0.2		<0.2								-
Lithium	ug/L	0.83	0.91	0.77	0.97	0.98	0.97	0.94	0.93		0.86								-
Mercury	ug/L	<0.1	<0.18	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13		<0.13								-
Molybdenum	ug/L	25.3	29.8	23.4	22.6	23.9	23.8	22.9	22.9		24.8								-
Selenium	ug/L	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.32	<0.32		<0.32								-
Thallium	ug/L	<0.14	<0.14	<0.14	0.2	<0.14	<0.14	<0.14	<0.14		<0.14								-
Total Radium	pCi/L	1.47	0.387	0.492	0.331	0.407	1.18	1.34	1.15		0.289								_
Radium-226	pCi/L	0.484	-0.152	-0.097	0	0	0.482	0.594	0.163		0.132								-
Radium-228	pCi/L	0.985	0.387	0.492	0.331	0.407	0.696	0.746	0.982		0.157								-
Field Specific Conductance	umhos/cm	405	505.8	487.2	509.7	858	486	334.2	479.5	433.5	398.9	503.8	517	514	556	557.3	563	553	556
Oxygen, Dissolved	mg/L	0.88	0.04	0.18	0.34	0.13	0.14	0.25	0.12	0.23	0.14	0.1	0.13	0.12	0.24	0.19	0.18	1.35	0.17
Field Oxidation Potential	mV	-84.7	-106.2	-71.1	-113	-98.4	-55.2	-19.8	-77.3	97.1	-111.6	-75.8	-4.5	-60.5	-68.2	-55.9	79.6	23.5	59.6
Groundwater Elevation	feet	606.39	609.01	606.73	608.2	607.84	608.98	609.63	605.69	609.43	606.46	610.27	615.33	613.2	613.79	604.54	608.63	603.84	609.95
Temperature	deg C	15.1	15.4	15.3	15	14.6	14.8	14.7	14.9	14.9	14.4	15	13.9	14.2	13.6	13.9	13.5	13.5	13.2
Turbidity	NTU		0.36	0.63	0.38	0.21	0.37	0.66	0.17	1.25	0.42	2.83	0	2.66	0.75	1.11	0	0	0
pH at 25 Degrees C	Std. Units	7.4	7.3	7.6	7.8	7.3	7.7	7.8	7.6	7.5	7.7	7.7	7.6	7.7	7.7	7.7	7.8	7.9	7.6

Location ID:	B-31R																			
Number of Sampling Dates																				
Parameter Name	Units	12/9/2015	4/13/2016	7/19/2016	10/20/2016	1/12/2017	4/17/2017	6/8/2017	8/1/2017	10/19/2017	4/2/2018	10/9/2018	11/12/2018	4/22/2019	10/14/2019	4/13/2020	10/12/2020	4/19/2021	10/7/2021	4/25/2022
Boron	ug/L	851	838	641	1020	749	929	895	1550	645	540	1430		906	915	730	702	621	353	454
Calcium	ug/L	77400	84900	76100	84200	73900	85600	90700	93400	75700	72900	125000		105000	110000	93800	95700	91400	79000	81100
Chloride	mg/L	29.9	17.6	30.3	16.4	26	20.4	20.7	3.6	29	32.6	19.7		17.8	26	29.9	24.4	23.3	36.5	36
Fluoride	mg/L	<0.2	<0.2	<0.2	0.17	0.26	0.12	0.13	0.16	0.14	<0.1	<0.1		0.16	0.25	0.28	<0.48	0.19	0.22	<0.095
Field pH	Std. Units	6.79	6.76	6.44	6.53	6.8	6.8	6.67	6.56	7.19	6.76	6.41	6.59	6.62	6.72	6.79	6.89	6.91	6.63	6.77
Sulfate	mg/L	28.8	34.1	38.5	49.7	34.9	43	41.1	55.6	19.2	22	186	162	121	146	89.4	49.4	45.3	24.9	60
Total Dissolved Solids	mg/L	374	404	406	452	380	416	426	432	358	374	668	596	516	480	464	462	454	372	428
Antimony	ug/L	0.47	0.15	0.21	0.24	0.18	0.22	<0.15	0.18		0.15									
Arsenic	ug/L	0.47	0.24	0.37	0.37	0.22	0.29	<0.28	<0.28		<0.28									
Barium	ug/L	86.2	93.5	85.3	92.6	86.7	91.1	93.9	97.4		72.1									
Beryllium	ug/L	<0.13	<0.13	<0.13	<0.25	<0.13	<0.13	<0.18	<0.18		<0.18									
Cadmium	ug/L	2.5	2.5	2	3	2.2	3	2.9	3.1		2									
Chromium	ug/L	0.43	0.4	<0.39	<0.39	0.41	<0.39	<1	<1		<1									
Cobalt	ug/L	3	3.5	5.4	5.2	6.6	3.1	2.3	4.4		3.3									-
Lead	ug/L	1.8	0.53	0.14	0.37	0.047	0.57	<0.2	<0.2		<0.2									
Lithium	ug/L	18.6	18	18.1	22.3	21.4	21.7	21.4	22		16.2									-
Mercury	ug/L	<0.1	<0.18	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13		<0.13									-
Molybdenum	ug/L	31.4	27.2	23.9	24.4	27.1	26.8	25.4	21.6		31.9									-
Selenium	ug/L	0.69	0.48	<0.21	0.29	0.63	0.96	<0.32	1.4		0.93									-
Thallium	ug/L	2.2	1.9	2	2.3	2.1	2.2	2.2	2		1.8									-
Total Radium	pCi/L	1.34	1.22	1.16	1.3	1.23	0.613	1.36	1.31		0.676									-
Radium-226	pCi/L	0.575	0.661	0.513	0.583	0.92	0.38	0.534	0.612		0.132									-
Radium-228	pCi/L	0.769	0.559	0.649	0.717	0.31	0.233	0.827	0.698		0.544									-
Field Specific Conductance	umhos/cm	543	674	660	742	1100	637	465.4	697	519.6	476.8	1016	858	827	837	763	826	747	649	728
Oxygen, Dissolved	mg/L	2.36	0.07	0.09	0.33	0.21	0.16	0.21	0.27	0.21	0.45	0.12	0.19	0.1	0.1	0.14	0.22	0.12	1.81	0.38
Field Oxidation Potential	mV	77.6	36.2	-11	5.8	12.3	676	64.7	2.9	153	28	-0.5	1	94.2	20.7	7.3	-60.7	16.3	16.7	-25.3
Groundwater Elevation	feet	607.4	609.34	606.55	608.51	608.37	607.2	610.5	606.84	609.47	604.44	610.39	609.11	615.01	612.5	613.8	604.66	608.66	603.98	610.27
Temperature	deg C	15.8	15	15.1	15.2	14.5	13.8	13.6	14.8	15	13.8	15.9	15	11.8	14.2	12	14	12.1	13.8	11.3
Turbidity	NTU		1.01	1.5	0.7	0.72	0.62	0.92	1.18	1.53	1.29	3.94	3.83	0	2.81	0.01	0	11.39	0	3.68
pH at 25 Degrees C	Std. Units	6.7	6.8	6.6	7.1	6.8	6.8	6.8	6.8	6.8	6.8	6.8		6.8	7	6.8	7.1	6.9	7.3	6.9

Appendix E Alternative Source Demonstration Reports

E1 Alternative Source Demonstration, October 2021 Detection Monitoring

Alternative Source Demonstration October 2021 Detection Monitoring

Slag Pond Nelson Dewey Generating Station Cassville, Wisconsin

Prepared for:



SCS ENGINEERS

25222071.00 | April 18, 2022

2830 Dairy Drive Madison, WI 53718-6751 608-224-2830

Table of Contents

2ecti	on			Page
PE Ce	ertifica	ation		ii
1.0	Intro	duction.		1
	1.1	§257.9	94(e)(2) Alternative Source Demonstration Requirements	1
	1.2	Site In	formation and Map	1
	1.3	Statist	ically Significant Increases Identified	2
	1.4	Overvi	ew of Alternative Source Demonstration Approach	2
2.0	Back	ground.		3
	2.1		gic and Hydrogeologic Setting	
		2.1.1	Regional Information	3
		2.1.2	Site Information	3
	2.2	Coal C	ombustion Residuals Rule Monitoring System	2
	2.3		Monitoring Wells	
3.0	Meth		y and Analysis Review	
	3.1	-	ing and Field Analysis Review	
	3.2		atory Analysis Review	
	3.3		ical Evaluation Review	
	3.4		ary of Methodology and Analysis Review Findings	
4.0	Alter		Sources	
	4.1	Potent	ial Causes of Statistically Significant Increases	
		4.1.1	Natural Variation	
		4.1.2	Man-Made Alternative Sources	
	4.2		of Evidence	
		4.2.1	Previous CCR Pond and Landfill Study	
		4.2.2	5 '	
		4.2.3	State Program Groundwater Monitoring Results	
			Source Demonstration Conclusions	
			water Monitoring Recommendations	
7.0	Refe	rences.		9
			Tables	
			Tables	
Table Table Table Table	2. 3.	His Gro	oundwater Analytical Results Summary – October 2021 storical Analytical Results for Parameters with SSIs oundwater Elevation Summary – State and CCR Monitoring Wells alytical Results – State Monitoring Program	
	••	, 111	any area in a control in a cont	

Figures

Figure 1.	Site Location Map
Figure 2.	Aerial View
Figure 3.	Site Plan and Monitoring Well Locations
Figure 4.	Water Table Flow Map - October 2021

Appendices

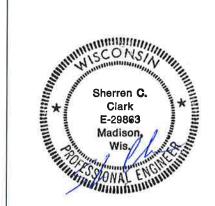
Appendix A	CCR Well Trend Plots
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Appendix B 1994 RMT Environmental Contamination Assessment Information

Appendix C 2016 Low-Hazard Waste Exemption Leaching Test Results – Slag and Ash

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PE CERTIFICATION



I, Sherren Clark, hereby certify that that the information in this alternative source demonstration is accurate and meets the requirements of 40 CFR 257.94(e)(2). This certification is based on my review of the groundwater data and related site information available for the Nelson Dewey Generating Station Slag Pond facility. I am a duly licensed Professional Engineer under the laws of the State of Wisconsin.

(signature) (date)

She wen Clark (printed or typed name)

License number <u>E-29863</u>

My license renewal date is July 31, 2022.

Pages or sheets covered by this seal:

Alternative Source Demonstration, October 2021

Detection Monitoring – Slag Pond

Nelson Dewey Generating Station, Cassville

(Entire Document)



1.0 INTRODUCTION

This Alternative Source Demonstration (ASD) was prepared to support compliance with the groundwater monitoring requirements of the "Coal Combustion Residuals (CCR) Final Rule" published by the U.S. Environmental Protection Agency (U.S. EPA) in the *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule,* dated April 17, 2015 (U.S. EPA, 2015), and subsequent amendments. Specifically, this report was prepared to fulfill the requirements of 40 CFR 257.94(e)(2). The applicable sections of the Rule are provided below in *italics*.

1.1 §257.94(E)(2) ALTERNATIVE SOURCE DEMONSTRATION REQUIREMENTS

The owner and operator may demonstrate that a source other than the CCR Unit caused the statistically significant increase over background levels for a constituent or that the statistically significant increase resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. The owner or operator must complete the written demonstration within 90 days of detecting a statistically significant increase over background levels.

An ASD is completed when there are exceedances of one or more benchmarks established within the groundwater monitoring program. The ASD is completed to determine if any other sources are likely causes of the identified exceedance(s) of established benchmark(s) at the site. This ASD was performed in response to results indicating a statistically significant increase (SSI) over background levels during detection monitoring under the CCR Rule.

This ASD report is evaluating the SSIs observed in the statistical evaluation of the October 2021 detection monitoring event at the Nelson Dewey Generating Station (NED). The first ASD was prepared for this facility evaluating the SSIs observed in the statistical evaluation of the October 2017 detection monitoring event (SCS Engineers [SCS], 2018). The October 2017 ASD and subsequent semiannual updates have concluded that several lines of evidence demonstrate that SSIs reported for Appendix III parameters in the downgradient monitoring wells were likely due to man-made sources other than the slag pond CCR Unit and/or naturally occurring constituents in the alluvial aquifer. The conclusions of this ASD are consistent with previous ASDs.

1.2 SITE INFORMATION AND MAP

The NED site is located along the east bank of the Mississippi River, north of the Village of Cassville, in Grant County, Wisconsin (**Figure 1**). The facility includes a decommissioned coal-fired generating plant, a CCR landfill that was closed in 2001, a closed Slag Pond, and a closed wastewater treatment pond. The layout of the site on an aerial photograph base is shown on **Figure 2**. The closed landfill at the NED facility was permitted under Wisconsin Department of Natural Resources (WDNR) License #02525.

The existing CCR Unit evaluated for this ASD is:

Slag Pond (existing surface impoundment – closed January 2018)

A map showing the CCR Unit and all background (or upgradient) and downgradient monitoring wells with identification numbers for the CCR groundwater monitoring program and the state monitoring program is provided as **Figure 3**.

Operations at the facility began in the late 1950s, and a CCR impoundment that included what is now the Slag Pond closure area was commissioned at that time. The CCR landfill was initially licensed in 1976 and received fly ash from NED until it was closed in phases between 1996 and 2001. The CCR landfill was initially operated as a fly ash sluice basin, then transitioned to dry ash placement prior to closure. The wastewater ponds, now closed, were constructed in 1976 for the purpose of settling CCR from the NED process wastewater streams and sediment from storm water runoff prior to discharge. Both NED generating units were retired on December 31, 2015, and have since been decommissioned. The generating station was demolished in 2017. Closure of the slag pond was completed in January 2018.

1.3 STATISTICALLY SIGNIFICANT INCREASES IDENTIFIED

The statistical evaluation was completed in accordance with 40 CFR 257.93(f)(3) using a prediction interval procedure, in which an interval for each constituent is established from the distribution of the background data, and the level of each constituent in each compliance well is compared to the upper prediction limit (UPL). The initial evaluation was based on an interwell comparison. The UPLs were calculated based on a 1-of-2 resampling approach. The UPLs and the analytical results for the October 2021 monitoring event are summarized in the attached **Table 1**.

The initial evaluation indicated that the October 2021 monitoring event results represent an SSI over background for the following parameters and wells:

Boron: B-11A, B-11B, B-11R, B-31A, B-31R

Calcium: B-11RField pH: B-11BSulfate: B-11B, B-11R

• Total Dissolved Solids (TDS): B-11B, B-11R

The SSIs are consistent with SSIs identified in previous detection monitoring results. Although the UPLs were calculated based on a 1-of-2 resampling approach, optional retesting for the October 2021 event was not conducted, and the determination of SSIs is based solely on the October results.

1.4 OVERVIEW OF ALTERNATIVE SOURCE DEMONSTRATION APPROACH

This ASD report includes:

- Background information (Section 2.0).
- Evaluation of potential that SSIs are due to methodology or analysis (Section 3.0).
- Evaluation of potential that SSIs are due to natural sources or man-made sources other than the CCR Units (Section 4.0).
- ASD conclusions (Section 5.0).
- Monitoring recommendations (Section 6.0).

Historical monitoring results from background and compliance sampling for the CCR Rule constituents with SSIs are provided in **Table 2**. The laboratory report for the October 2021 event was included in the 2021 Annual Groundwater Monitoring and Corrective Action report completed in January 2022. Complete laboratory reports for the background monitoring events and previous detection monitoring events were included in the previous annual groundwater monitoring and corrective action reports.

2.0 BACKGROUND

To provide context for the ASD evaluation, the following background information is provided in this section of the report, prior to the ASD evaluation sections:

- Geologic and hydrogeologic setting
- CCR Rule monitoring system
- Other monitoring wells

A more detailed discussion of the background information for the site is provided in the ASD for the October 2017 event (SCS, 2018).

2.1 GEOLOGIC AND HYDROGEOLOGIC SETTING

2.1.1 Regional Information

The uppermost geologic formation beneath the NED site is the surficial alluvial aquifer. The alluvial aquifer consists of Mississippi River valley sand and gravel deposits, and is the uppermost aquifer as defined in section 257.53 of the CCR Rule. This deposit is prevalent along the edges of the entire Mississippi River valley in southwestern Wisconsin.

The alluvial aquifer is underlain by dolomitic bedrock of the Prairie du Chien Group. The dolomite bedrock is also an aquifer and is likely hydraulically connected to the alluvial aquifer above.

Regionally, groundwater flow is generally to the southwest and discharges to the Mississippi River.

Additional details on the regional geology were provided in the October 2017 ASD (SCS, 2018).

2.1.2 Site Information

The thickness of the alluvium in the immediate vicinity of the site is over 125 feet, as evidenced by local water supply well logs (SCS, 2018). These logs are also evidence that the alluvial aquifer yields useable quantities of groundwater for supply wells in the area. Soil boring logs for monitoring wells installed at the site also generally indicate sand and gravel soils within the monitored depths.

The groundwater flow direction in the vicinity of the plant is generally southwest toward the Mississippi River. Historically, infiltration at the former Slag Pond, former fly ash basin, and the former Wisconsin Pollutant Discharge Elimination System (WPDES) ponds caused groundwater mounding to be present around these features; however, these ponds have now all been closed and are no longer sources of infiltration.

Site water level measurements generally indicate that groundwater flow is to the southwest, discharging to the Mississippi River. However, during periods of high river water levels, the flow temporarily reverses and the river discharges to the shallow sand and gravel aquifer. The groundwater flow direction during the October 2021 detection monitoring event was toward the Mississippi River with flow generally moving south to southeast (**Figure 4**). The groundwater elevations are provided in **Table 3**.

2.2 COAL COMBUSTION RESIDUALS RULE MONITORING SYSTEM

The groundwater monitoring system established in accordance with the CCR Rule consists of one upgradient (background) monitoring well and six downgradient monitoring wells. The background well is B-26. The downgradient wells include B-7R, B-11A, B-11B, B-11R, B-31A, and B-31R. The CCR Rule wells are installed within the surficial alluvium aquifer. Well depths range from approximately 23 to 114 feet, measured from the top of the well casing.

2.3 OTHER MONITORING WELLS

There are several additional groundwater monitoring wells at the NED facility that are part of the monitoring system developed for the state monitoring program. All of the wells included in the CCR monitoring well network were already in use for the state monitoring program. The well locations are shown on **Figure 3**. The state program monitoring wells and two private wells are used to monitor groundwater conditions at the site under WDNR License Number 2525, which includes the closed CCR landfill and the closed Slag Pond. Monitoring wells for the state monitoring program are installed in the surficial sand and gravel aquifer, which is the uppermost aquifer as defined under 40 CFR 257.53.

3.0 METHODOLOGY AND ANALYSIS REVIEW

To evaluate the potential that an SSI is due to a source other than the regulated CCR Unit, SCS used a two-step evaluation process. First, the sample collection, field and laboratory analysis, and statistical evaluation were reviewed to identify any potential error or analysis that led to an exceedance of the benchmark. Second, potential alternative sources, including natural variation and man-made sources other than the CCR Unit, were evaluated. This section of the report provides the findings of the methodology and analysis review. **Section 4.0** of the report addresses the potential alternative sources.

3.1 SAMPLING AND FIELD ANALYSIS REVIEW

Field notes and sampling results were reviewed to determine if any sampling error may have caused or contributed to the observed SSIs. Potential field sampling errors or issues could include mislabeling of samples, improper sample handling, missed holding times, cross contamination during sampling, or other field error. Field blank sample results were also reviewed for any indication of potential contamination from sampling equipment or containers. Based on the review of the field notes and results, SCS did not identify any indication that the SSIs were due to a sampling error.

SCS did not identify any issues with the field sampling for field analysis based on review of the data and field notes. Because boron, calcium, total dissolved solids (TDS), and sulfate are laboratory parameters, there is little potential for a field analysis error to contribute to an SSI.

Historically, an SSI for boron at B-7R has been identified. During the semiannual sampling event on October 7, 2021, there was not a sufficient amount of water present at this well to conduct sampling. A resampling of this well was attempted on October 28, 2021, but there was still not a sufficient amount of water at this well on this date.

3.2 LABORATORY ANALYSIS REVIEW

The laboratory reports for the October 2021 detection monitoring events were reviewed to evaluate whether any laboratory analysis error or issue may have caused or contributed to the observed SSIs. The laboratory report review included reviewing the laboratory quality control flags and narrative, verifying that correct methods were used and desired detection limits were achieved, and checking

the field and laboratory blank sample results. Laboratory reports for the background monitoring events were reviewed for the October 2017 ASD. Laboratory reports for subsequent detection monitoring events were reviewed as part of the ASD preparation for each event.

Based on the review of the laboratory reports, SCS did not identify any indication that any SSI was due to a laboratory analysis error. There were no laboratory quality control flags or issues identified in the laboratory reports that affect the usability of the data for detection monitoring. Chloride was detected in the field blank at a low concentration below the laboratory's limit of quantitation. The detected level was much lower than levels reported for the monitoring well samples; therefore, the usability of the groundwater data is not affected by the field blank detection.

Time series plots of the SSI constituent analytical data were also reviewed for any anomalous results that might indicate a possible sampling or laboratory error (e.g., dilution error or incorrect sample labeling). The time series plots are provided in **Appendix A**. None of the time series plots included anomalous results that appeared to indicate a sampling or laboratory error. At B-11B, an increased sulfate trend is observed which begin in April 2018. For more details on sulfate concentrations and the man-made sources other than the slag pond CCR unit, see **Section 4**.

3.3 STATISTICAL EVALUATION REVIEW

The review of the statistical results and methods included a quality control check of the following:

- Input analytical data vs. laboratory analytical reports
- Statistical method and process for each SSI

Based on the review of the statistical evaluation, SCS did not identify any errors or issues in the statistical evaluation that caused or contributed to the determination of interwell SSIs for boron, calcium, field pH, sulfate, and TDS at the downgradient monitoring wells.

3.4 SUMMARY OF METHODOLOGY AND ANALYSIS REVIEW FINDINGS

In summary, there were no changes to the SSI determinations for the October 2021 detection monitoring events based on the methodology and analysis review. No errors or issues causing or contributing to the reported SSIs were identified.

4.0 ALTERNATIVE SOURCES

This section of the report discusses the potential alternative sources for the SSI constituents at the downgradient wells, identifies the most likely alternative source(s), and presents the lines of evidence indicating that an alternative source is the most likely cause of the observed SSIs.

4.1 POTENTIAL CAUSES OF STATISTICALLY SIGNIFICANT INCREASES

4.1.1 Natural Variation

The statistical analysis was completed using an interwell approach, comparing the October 2021 detection monitoring results to the UPLs calculated based on sampling of the background well (B-26). If concentrations of a constituent that is naturally present in the aquifer vary spatially, then the potential exists that the downgradient concentrations may be higher than upgradient concentrations due to natural variation.

Although natural variation is present in the shallow aquifer, it does not appear likely that natural variation is the primary source causing the boron, field pH, sulfate, and TDS SSIs. These parameters were detected at higher concentrations than would likely be present naturally.

Natural variation may have caused or contributed to the SSI for calcium at B-11R. As discussed in **Section 2.1.1**, the alluvial aquifer is underlain by dolomitic bedrock of the Prairie du Chien Group. The dolomite aquifer is also present in the bluffs northeast of the site and groundwater from the dolomite likely discharges to the alluvial aquifer. Calcium is a typical constituent of groundwater in dolomite aquifers. The calcium concentrations in upgradient well B-26 have exceeded those in at least three of the downgradient wells, suggesting that natural variability may contribute to the calcium concentrations observed in the downgradient monitoring wells.

4.1.2 Man-Made Alternative Sources

Man-made alternative sources that could potentially contribute to the boron, calcium, field pH, sulfate, and TDS SSIs could include the closed CCR landfill, the coal storage area, or other plant operations. Based on the groundwater flow directions and on previous investigations at the site, the closed landfill appears to be the most likely man-made cause of the SSIs for the downgradient wells B-11A, B-11B, B-31A, and B-31R.

4.2 LINES OF EVIDENCE

The lines of evidence indicating that the SSIs for boron, calcium, field pH, sulfate, and TDS in one or more compliance wells relative to the background well are more likely due to the closed landfill and prior fly ash sluicing than to the Slag Pond include:

- 1. A previous Environmental Contamination Assessment completed for the ash disposal facility indicated that the fly ash sluicing and landfill were the primary source of the groundwater impacts in the area, based on multiple lines of evidence.
- 2. Sampling performed in preparation for the Slag Pond closure indicated that the slag and the Slag Pond sediment had little potential to cause the SSIs for boron, sulfate, and TDS.
- 3. Past and current groundwater monitoring performed under the state monitoring program shows that groundwater quality has improved since the 1990s in response to termination of fly ash sluicing and closure, and capping of the ash landfill. Recent concentration increases at some wells in the state monitoring program appear to be attributable to the closed CCR landfill source and to changes in groundwater flow at the site in response to closure of the Slag Pond.

The data supporting these lines of evidence are discussed below. Most of these lines of evidence and the supporting data were discussed in detail in the ASD for the October 2017 detection monitoring event (SCS, 2018), with the exception of the TDS SSI concentrations. For lines of evidence included in previous ASDs, the discussion focuses on any updated information collected since the previous ASD, with references to the previous ASD for additional details.

4.2.1 Previous CCR Pond and Landfill Study

A previous investigation titled *Environmental Contamination Assessment: Nelson Dewey Generating Station Ash Disposal Facility*, completed by RMT in 1994, found that groundwater impacts were associated with disposal of fly ash in the now-closed CCR landfill located immediately north of the Slag Pond (**Figure 3**). The purpose of the 1994 Environmental Contamination Assessment (ECA) was to investigate the impacts to groundwater at the NED landfill. The ECA was used to evaluate

feasibility of possible remedial alternatives. The remedial alternative that was ultimately selected was to convert the plant to dry fly ash handling.

The primary lines of evidence from the 1994 report that support the current ASD for boron, field pH, sulfate, and TDS include:

- Water leaching tests for ash and slag indicated that boron and sulfate concentrations in the slag leachate were orders of magnitude lower than in the fly ash leachate (Appendix B, Table 5). Higher pH values were also reported for leach samples of Western coal fly ash in 1990 to 1992 than for the slag samples.
- Surface water samples from the then active fly ash sluice pond and the Slag Pond indicated that boron and sulfate concentrations in the Slag Pond were one or more orders of magnitude lower than in the ash sluice pond. The surface water pH measurement was also higher in the ash sluice pond. The surface water boron and sulfate concentrations in the Slag Pond were higher than leach test results, which was attributed to infiltration of ash sluice pond water through the berm between the ponds into the Slag Pond (Appendix B, Table 6).
- Groundwater sampling at monitoring wells B-38 and B-38A (now abandoned), which were
 installed through and screened below the ash disposal area (now closed landfill),
 indicated that groundwater affected by ash sluicing was characterized by high pH and
 elevated concentrations of boron, sulfate, and TDS (Appendix B, Site Map and Table 8).

Although calcium was not included in the historical state groundwater monitoring program or evaluated in the 1994 report, hardness was monitored and provides an indication of relative calcium concentrations. Surface water samples from the then active ash sluice pond and the Slag Pond indicated that hardness in the Slag Pond was lower than in the ash sluice pond (**Appendix B**, **Table 6**). These results suggest that if the calcium SSI is not solely due to natural variation, then the closed CCR landfill is the most likely man-made source of calcium.

The results of the 1994 ECA were reported to WDNR on November 1994. The ECA investigation was then used for a feasibility study to determine appropriate ash disposal operation on site. Following the ECA, the plant converted to a dry ash handling system. Dry ash was placed in the CCR landfill through the 1990s, and the landfill was capped and closed in phases in 1996 through 2001. After that time, fly ash was not disposed of at the facility.

4.2.2 Slag Pond Closure Sampling Results

Results of leaching test analysis performed for slag, ash, soil, and sediment were submitted as part of a Low Hazard Exemption Request to the WDNR in March 2017 (SCS, 2017). The Exemption Request was submitted as part of the Closure Plan for the site and requested WDNR approval to consolidate materials from decommissioning activities in the Slag Pond and Slag Handling Area, which would then be capped with a composite final cover system. The sediment and soil samples were collected to characterize the materials that would remain on site under the Closure Plan. Leaching tests were performed using ASTM water leach test methods. The leaching test analytical results for parameters with SSIs that were included in the leaching test program (boron, sulfate, and TDS) are summarized in **Appendix C**.

The sampling results in the Exemption Request indicated that the materials to be consolidated and capped were not likely to cause groundwater standard exceedances for boron, sulfate, or TDS. The

leach test results for slag, Slag Pond sediment, and soil in the Slag Handling Area were below the state groundwater standards for boron, and sulfate. The parameter TDS does not currently have a state standard but the leach test results for slag, Slag Pond sediment, and soil in the Slag Handling Area were all below the calculated TDS UPL for the site (**Table 1** and **Appendix C**). The boron, sulfate, and TDS results were also below the concentrations of in the downgradient CCR wells with SSIs, and well below the historical results for former well B-38, which was located within the CCR landfill area, upgradient from the Slag Pond (**Appendix B**, **Table 8**).

The Low Hazard Exemption was granted by the WDNR based on the sampling results and other information presented.

4.2.3 State Program Groundwater Monitoring Results

Past and current groundwater monitoring performed under the state monitoring program shows that groundwater quality has improved substantially since the 1990s in response to termination of fly ash sluicing, and closure and capping of the ash landfill (SCS, 2018). The long-term trends show that concentrations of boron and sulfate in groundwater have decreased or stabilized since termination of fly ash sluicing and closure of the landfill, in some cases by an order of magnitude or more. The results suggest that current pH levels and boron, sulfate, and TDS concentrations likely represent residual contamination from historical ash disposal in the CCR landfill area. Increases in boron and sulfate concentrations at B-11B beginning in 2018 appear to be attributable to the closed CCR landfill and to changes in groundwater flow at the site, related to a decrease in the volume of water discharged to the Slag Pond and subsequent closure of the Slag Pond. Concentrations of boron in samples from B-11B transitioned to a decreasing trend as of October 2019. A summary of state analytical groundwater results is provided in **Table 4**.

5.0 ALTERNATIVE SOURCE DEMONSTRATION CONCLUSIONS

The lines of evidence discussed above regarding the SSIs reported for boron, calcium, field pH, sulfate, and TDS results in downgradient monitoring wells demonstrate that the SSIs are likely primarily due to sources other than the closed Slag Pond. The SSIs for boron, calcium, field pH, sulfate, and TDS appear to be due to historical ash disposal in the closed CCR landfill, which is not subject to the requirements of 40 CFR 257.50-107. The landfill is regulated by the WDNR under the solid waste program (License 02525). Natural variation in groundwater quality in the aquifer may also contribute to the SSI for calcium.

6.0 SITE GROUNDWATER MONITORING RECOMMENDATIONS

In accordance with section 257.94(e)(2) of the CCR Rule, the NED Slag Pond site may continue with detection monitoring based on this ASD. The ASD report will be included in the 2021 Annual Report due January 31, 2022.

7.0 REFERENCES

RMT, 1994, Environmental Contamination Assessment: Nelson Dewey Generating Station Ash Disposal Facility, November 1994.

SCS Engineers, 2017, Low Hazard Exemption Request, Nelson Dewey Generating Station, Cassville, WI, March 2017.

SCS Engineers, 2018, 2017 Alternative Source Demonstration, October 2017 Monitoring Event, Nelson Dewey Generating Station, April 2018.

U.S. Environmental Protection Agency (U.S. EPA), 2015, Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, April 2015.

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Tables

- 1 Groundwater Analytical Results Summary October 2021
- 2 Historical Analytical Results for Parameters with SSIs
- 3 Groundwater Elevation Summary State and CCR Monitoring Wells
- 4 Analytical Results State Monitoring Program

Table 1. Groundwater Analytical Results Summary Nelson Dewey Slag Pond, Cassville, WI / SCS Engineers Project #25221071.00

		Background Well			Complic	ance Wells			
		B-26	B-7R*	B-11A	B-11A B-11B		B-31A	B-31R	
Parameter Name	UPL	10/8/2021	10/7/2021	10/7/2021	10/7/2021	10/7/2021	10/7/2021	10/7/2021	
Appendix III									
Boron, ug/L	72.3	48.4		85.4	2,480	2,940	178	353	
Calcium, ug/L	108,000	84,900		51,400	100,000	119,000	53,500	79,000	
Chloride, mg/L	77.6	39.1		58.8	39.6	23.1	60.3	36.5	
Fluoride, mg/L	0.2	<0.095		0.22 J	<0.95 D3	<0.48 D3	0.15 J	0.22 J	
Field pH, Std. Units	7.71	7.18		7.57	7.81	6.86	7.44	6.63	
Sulfate, mg/L	44.0	43.8		7.0	466	61.8	14.9	24.9	
Total Dissolved Solids, mg/L	553	440		356	884	576	294	372	

7.81 Blue shaded cell indicates the compliance well result exceeds the UPL (background) and the Limit of Quantitation (LOQ).

Abbreviations:

-- = Not Analyzed

UPL = Upper Prediction Limit SSI = Statistically Significant Increase LOQ = Limit of Quantitation LOD = Limit of Detection ug/L = micrograms per liter mg/L = milligrams per liter

Lab Notes:

J = Estimated concentration at or above the LOD and below the LOQ.

D3 = Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

Notes:

- 1. An individual result above the UPL may not constitute an SSI above background. See the accompanying letter text for identification of statistically significant results.
- 2. Interwell UPLs calculated based on results from background well B-26. UPLs are based on a 1-of-2 retesting approach.
- 3. Interwell UPLs updated January 2021 based on background well results from December 2015 through October 2020.
- *: Sufficient water for sample collection was not present in B-7R on October 7, 2021 or during a second sampling attempt on October 28, 2021.

 Created by: NDK
 Date:
 10/25/2021

 Last revision by: JSN
 Date:
 10/26/2021

 Checked by: NDK
 Date:
 10/27/2021

 Proj Mgr QA/QC/Scientist: TK
 Date:
 12/27/2021

Table 2. Historical Analytical Results for Parameters with SSIs Nelson Dewey Generating Station - Cassville, Wisconsin / SCS Engineers Project #25221071.00

Well Group	Well	Collection Date	Boron (µg/L)	Calcium (mg/L)	Field pH (Std. Units)	Sulfate (mg/L)	Total Dissolved Solids (mg/L)
		12/9/2015	29.6	81,300	7.35	37.1	424
		4/12/2016	33.7	86,200	7.43	38.0	456
		7/19/2016	28.6	82,400	7.14	36.2	504
		10/20/2016	33.0	82,700	7.19	35.0	466
		1/12/2017	35.2	89,400	7.57	35.0	446
_		4/17/2017	50.1 45.8	89,000 105,000	7.54 7.22	32.4 31.0	468 538
Background		6/7/2017 8/2/2017	54.6	98,100	7.22	28.5	496
5	B 0/	10/19/2017	47.4	102,000	7.50	25.3	542
\$	B-26	4/2/2018	48.0	88,100	7.64	19.1	464
ğ		10/8/2018	53.4	78,700	7.20	25.1	450
ш		4/22/2019	41.6	75,300	7.10	26.7	458
		10/15/2019	<3.00 U	<76.2	7.24	36.0	404
		4/14/2020	66.1	88,500	7.27	30.2	464
		10/13/2020	63.6	76,500	7.34	37.0	448
		4/21/2021	63.6	78,700	7.27	35.3	470
		10/8/2021	48.4	84,900	7.18	43.8	440
		12/9/2015	124	58,800	7.70	3.20 J	338
		4/13/2016	116	60,100	7.75	3.80 J	362
		7/19/2016	104	54,000	7.42	2.70 J	336
		10/19/2016	112	54,600	7.47	3.00 J	340
		1/12/2017	106	54,500	7.89	2.30 J	322
		4/17/2017	100	54,800	7.38	<1.00	326
		6/8/2017	102	57,800	7.78	1.40 J	338
		8/1/2017	105	54,500	7.67	2.40 J	326
	B-11A	10/19/2017	116	55,000	7.96	5.10	322
		4/2/2018	91.0	53,300	8.04	12.3 MO	336
		10/9/2018	94.2	48,600	7.43	6.00	332
		4/22/2019	93.9	60,400	7.62	1.90 J	386
		10/14/2019	80.7	56,600	7.66	<1.00	348
		4/13/2020	86.3	57,500	7.75	1.40 J	394
		10/12/2020 4/19/2021	99.3	55,600 50,600	7.74 7.65	1.00 J 2.9	364 366
		10/8/2021	88.1 85.4	51,400	7.57	7.0	356
		12/9/2015	1,140	64,100	8.06	134	494
		4/13/2016	1,360	65,400	8.14	148	512
		7/19/2016	1,210	59,000	7.77	165	520
		10/20/2016 1/12/2017	1,460 1,540	59,100 63,900	7.91 8.18	178 182	496 488
		4/17/2017	1,760	67,400	7.83	181	502
		6/8/2017	1,880	68,200	8.07	191	516
Φ.		8/1/2017	1,800	61,400	7.77	179	498
Ğ		10/19/2017	1,500	52,400	7.77	175	510
<u>id</u>	B-11B	4/2/2018	2,020	59,000	8.42	200	550
Compliance		10/9/2018	3,620	66,300	7.74	197	602
Ö		11/12/2018	_		8.05		594
		4/22/2019	6,830	83,300	7.91	303	742
		10/14/2019	4,630	91,400	7.92	339	728
		4/13/2020	5,380	115,000	7.89	378	872
		10/12/2020	3,350	91,200	7.80	388	906
		4/19/2021	4,440	93,400	8.07	379 MO	910
		10/8/2021	2,480	100,000	7.81	466	884
		12/9/2015	4,170	126,000	7.07	75.4	616
		4/13/2016	3,410	141,000	6.78	18.4	682
		7/19/2016	3,530	130,000	6.69	115	698
		10/20/2016	4,120	128,000	6.77	118	660
		1/12/2017	3,530	126,000	6.98	108	616
		4/17/2017 6/7/2017	3,520 3,420	123,000 128,000	7.11 6.80	108 98.2	620 630
		8/1/2017	2,040	139,000	6.70	126	738
	D 11D	10/19/2017	3,120	117,000	7.22	97.7	586
	B-11R	4/2/2018	3,180	124,000	7.14	88.1	638
		10/9/2018	576	49,900	6.55	15.1	266
		4/22/2019	1,360	82,400	6.82	34.6	406
		10/14/2019	1,440	66,000	6.83	40.7	310
		4/13/2020	2,140	117,000	6.80	41.9	570
		10/12/2020	2,870	120,000	6.83	22.8	600
	I	4/19/2021	3,010	115,000	7.11	61.2	578

Table 2. Historical Analytical Results for Parameters with SSIs Nelson Dewey Generating Station - Cassville, Wisconsin / SCS Engineers Project #25221071.00

Well Group	Well	Collection Date	Boron (µg/L)	Calcium (mg/L)	Field pH (Std. Units)	Sulfate (mg/L)	Total Dissolved Solids (mg/L)
		12/9/2015	59.0	48,400	7.65	26.2	274
		4/13/2016	79.2	51,900	7.63	22.6	302
		7/19/2016	67.2	48,900	7.25	24.2	280
		10/20/2016	63.7	45,800	7.54	27.2	292
		1/12/2017	76.4	46,600	7.82	29.8	284
		4/17/2017	69.9	46,900	7.83	31.0	318
		6/8/2017	58.5	49,400	7.74	31.2	296
		8/1/2017	56.3	46,000	7.56	26.6	284
	B-31A	10/19/2017	63.9	49,600	7.92	26.1	290
		4/2/2018	74.8	49,300	8.00	27.4	282
		10/9/2018	71.8	46,600	7.48	24.8	278
		4/22/2019	86.2	48,200	7.61	21.6	284
		10/14/2019	98.5	52,200	7.69	22.3	272
		4/13/2020	132	50,900	7.71	16.6	298
		10/13/2020	127	47,700	7.78	16.8	300
		4/19/2021	172	52,100	7.90	15.8	330
		10/8/2021	178	53,500	7.44	14.9	294
		12/9/2015	851	77,400	6.79	28.8	374
		4/13/2016	838	84,900	6.76	34.1	404
		7/19/2016	641	76,100	6.44	38.5	406
		10/20/2016	1,020	84,200	6.53	49.7	452
		1/12/2017	749	73,900	6.80	34.9	380
	4)	4/17/2017	929	85,600	6.80	43.0	416
		6/8/2017	895	90,700	6.67	41.1	426
Ö		8/1/2017	1,550	93,400	6.56	55.6	432
ē		10/19/2017	645	75,700	7.19	19.2	358
둳	B-31R	4/2/2018	540	72,900	6.76	22.0	374
Compliance		10/9/2018	1,430	125,000	6.41	186	668
O		11/12/2018			6.59	162	596
		4/22/2019	906	105,000	6.62	121	516
		10/14/2019	915	110,000	6.72	146	480
		4/13/2020	730	93,800	6.79	89.4	464
		10/12/2020	702	95,700	6.89	49.4	462
		4/19/2021	621	91,400	6.91	45.3	454
		10/8/2021	353	79,000	6.63	24.9	372
		12/9/2015	110	31,700	6.74	17.0 J	198
		4/13/2016	115	42,300	6.80	2.50 J	218
		7/18/2016	164	44,400	6.29	2.40 J	220
		10/19/2016	154	56,600	6.55	<5.00	288
		1/12/2017	159	56,700	7.43	<5.00	240
		4/17/2017	129	61,400	6.60	<5.00	278
		6/7/2017	110	51,600	6.65	<5.00	240
		8/1/2017	129	50,400	6.28	3.70	220
	B-7R	10/19/2017	159	56,200	6.88	<5.00 , D3	242
		4/2/2018	121	49,200	6.57	<5.00 , D3	220
		10/9/2018	73.0	38,500	6.23	3.20	186
		4/22/2019	93.5	59,400	6.63	<5.00 , D3	254
		10/14/2019	139	57,700	6.62	<5.00 , D3	208
		4/13/2020	96.0	58,700	6.60	7.50 J, D3	306
		10/13/2020	145	41,900	6.35	<2.20	208
		4/20/2021	104	56,100	6.54	<2.2 D3	248
		10/8/2021(1)					-

μg/L = micrograms per liter or parts per billion (ppb)

mg/L = milligrams per liter or parts per million (ppm)
Std. Units = Standard Units

J = Estimated concentration at or above the LOD and below the LOQ.

D3 = Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

M0 = Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.

-- = Not applicable.

(1) B-7R could not be sampled on 10/8/2021 or during an attempted resampling event on 10/28/2021 due to low water levels.

Created by:	NDK	Date:	3/8/2018
Last revision by:	RM	Date:	2/8/2022
Checked by:	JR	Date:	3/18/2022

I:\25221071.00\Deliverables\2021 October ASD NED\Tables\[Table 2_Analytical Results - App III.xlsx]2. Analytical Results

Table 3. Groundwater Elevation Summary Nelson Dewey Closed Ash Disposal Facility / SCS Engineers Project #25221071.00

									Ground	water Eleva	ation in feet	above me	ean sea lev	/el (amsl)											
Well Number	B-7R	B-8R	B-11R	B-11A	B-11B	B-21R	B-26	B-26A	B-28	B-30R	B-30AR	B-31R	B-31A	B-32	B-32A	B-35	B-35A	B-36	B-36A	B-37	B-37A	B-39	MW-301	MW-302	MW-303
Top of Casing Elevation (feet amsl)	623.35	627.51	622.62	622.12	621.89	623.31	626.40	626.40	616.81	621.81	622.4	622.42	622.69	614.18	614.4	620.78	621.09	621.11	621.33	614.85	614.85	626.48	619.09	619.21	618.49
Screen Length (ft)	10	10	10	5	5	10	10	5	10	10	5	10	5	10	5	10	5			10	5	10	10	10	10
Total Depth (ft from top of casing)	23.05	27.25	24.15	52.00	113.90	22.78	31.67	45.78	16.70	22.20	46.90	22.82	35.52	14.79	52.00	16.60	47.00			19.95	48.20	26.90	21.11	21.27	20.15
Top of Well Screen Elevation (ft)	610.30	610.26	608.47	575.12	512.99	610.53	604.73	585.62	610.11	609.61	580.50	609.60	592.17	609.39	567.40	614.18	579.20			604.90	571.65	609.58	607.98	607.94	608.34
Measurement Date																									
October 5-6, 2011	604.94	606.29	604.57	604.36	604.32	604.43	604.52	604.55	604.61	604.37	605.21	608.37	604.42	604.88	604.82	604.87	604.81			604.37	604.39				
April 25-26, 2012	606.58	606.30	606.07	606.30	606.28	1	605.89	605.91				608.65	606.31	604.33		606.29	621.20			606.16	606.17	606.17			
October 17, 2012	604.39	604.16	604.10	603.98	603.98	604.08	604.12	604.14	604.31	603.97	603.98	607.32	604.07	604.33	604.35		621.20			603.93	603.93	603.93			
April 2, 2013	607.04	608.01	606.15	607.20	607.17	606.30	605.60	605.64	605.90	605.91	605.93	607.13	607.13	606.11	606.14	606.13	606.25			606.99	607.02				
October 16-17, 2013	604.51	605.89	604.17	603.90	603.87	604.11	604.31	604.32	604.36	604.08	604.06	604.87	604.00	604.53	604.56	604.46	604.44			604.05	604.04				
April 10, 2014	607.42	608.97	607.45	607.28	607.26		607.22	607.23				607.37	607.28			607.46	607.39			607.25	607.26				
October 14-15, 2014	605.67	606.82	605.17	604.90	604.91	614.92	605.00	605.01	605.13	604.92	604.92	606.36	605.54	605.41	605.45	605.36	605.33			604.94	604.99				
April 16, 2015	607.26	608.50	607.11	607.15	607.05		606.40	606.41				607.37	607.09			606.73	606.78			606.99	606.88				
October 1-2, 2015	605.14	604.66	604.53	604.42	604.38	604.36	604.43	604.50	604.54	604.34	604.32	605.13	604.38	604.76	604.82	604.76	604.75			604.30	604.39				
December 8, 2015	606.69		606.71	606.30	606.26		606.80					607.40	606.39									607.54			
April 12, 2016	609.32	609.36	609.32	608.71	608.68		609.81	609.72				609.34	609.01			609.73	609.65			608.79	608.79	610.23			
July 18-19, 2016	606.54		606.14	606.76	606.74		606.09					606.55	606.73									606.28			
October 19-20, 2016	608.59	608.46	608.35	608.21	608.19	608.37	608.84	608.76	608.63	608.45	608.46	608.51	608.20	608.69	608.73	608.78	608.74			608.20	608.18	609.09			
January 11-12, 2017	608.02		607.96	607.83	607.78		608.56					607.90	607.84									608.92			
April 17, 2017	609.08	608.82	608.34	609.05	608.99	NM	608.59	608.54	609.94	608.57	608.64	607.20	608.98	608.96	608.98	609.00	609.02			609.02	609.02	610.23			
June 8, 2017	610.74		610.42	609.81	610.08		611.25					609.63	610.50									611.53			
August 1-2, 2017	607.02		606.73	605.57	605.50		607.39					606.84	605.69									608.71			
October 9-10, 2017	606.93	606.51	606.25	607.01	606.94		606.22	606.13	606.33	606.44	606.45	606.68	606.93	606.57	606.61	606.65	606.71								
October 19, 2017	609.60		609.42	609.58	609.65		608.84					609.47	609.43							609.40	609.40	608.55			
November 17, 2017						606.35	-																		
December 19, 2017						604.81	-																		
February 7, 2018	605.37		605.33	604.96	604.92		-		616.81			605.31	605.01									606.19	605.08	605.05	605.00
March 16, 2018																							604.64	604.6	604.56
April 2-3, 2018 **	604.82	606.61	606.27	606.63	606.55	606.52	606.49	606.37	606.39	606.46	606.43	604.44	606.46	606.58	606.66	606.68	606.70			606.77	606.83	606.19			
May 23, 2018																							610.68	610.78	610.61
October 8-10, 2018	610.76	610.68	610.67	610.28	610.24	610.02	610.34	610.28	610.83	610.09	610.05	610.39	610.27	611.05	610.94	610.72	610.54					611.44			
November 11, 2018					609.14							609.11													
April 22-23, 2019	615.28	615.66	615.28	615.29	615.28	614.98	615.49	615.31	615.40	615.36	615.35	615.01	615.33			615.87	615.98					615.40			
October 14-16, 2019	613.43	613.11	613.06	613.29	613.18	612.47	613.10	613.10	612.71	612.83	612.78	612.50	613.20	613.10	613.00	613.10	613.15					613.35			
April 13-14, 2020	614.12	613.76	614.39	613.88	613.86	613.22	613.76	613.73	613.68	613.60	613.56	613.80	613.79			614.04	614.00					613.71			
October 12-13, 2020	605.09	604.88	604.57	604.54	604.44	604.28	604.92	604.83	604.86	604.72	604.72	604.66	604.54	605.07	605.06	605.00	605.08					605.06			
April 19-21, 2021	608.83	608.66	608.57	608.72	608.67	607.93	608.55	608.49	608.27	608.38	608.35	608.66	608.63	608.68	608.74	608.86	608.85	608.40	608.39	608.74	608.75	608.48			
October 6-8, 2021	604.05	604.04	603.85	603.79	603.74	603.56	604.21	604.13	604.11	604.00	603.97	603.98	603.84	604.32	604.38	604.35	604.34	603.93	603.92			604.23			
Bottom of Well Elevation (ft)	600.30	600.26	598.47	570.12	507.99	600.53	594.73	580.62	600.11	599.61	575.50	599.60	587.17	599.39	562.40	604.18	574.20	600.60		594.90	566.65	599.58	597.98	597.94	598.34

Notes:

 Created by:
 MDB
 Date:
 4/1/2013

 Last revision by:
 JAO
 Date:
 12/20/2021

 Checked by:
 RM
 Date:
 12/27/2021

I:\25221071.00\Deliverables\2021 October ASD NED\Tables\[Table 3 - 2021 Groundwater Elevation Summary.xls] levels

^{-- =} not measured

^{*}The PVC casing at B-35A was cut down on June 28, 2018 to allow the protective cover to close. Groundwater elevations prior to 6/28/18 are calculated using the new TOC elevation (621.09 ft amsl).

** The PVC casing at B-21R was extended in 2018 following well rehabilitation. The well was resurveyed on April 22, 2019. The old top of casing elevation is 623.31 ft.

Table 4. Analytical Results - State Monitoring Program Nelson Dewey Generating Station Cassville, Wisconsin / SCS Engineers Project #25221071.00

WELL ID	SAMPLE MONTH	BORON, DISSOLVED (UG/L)	FLUORIDE, DISSOLVED (MG/L)	SULFATE, DISSOLVED (MG/L)	PH, FIELD (STANDARD UNITS
B-7R	2016-Apr	110	<0.20	7.40	6.80
D-7 K	2016-Oct	147	<2.00	<20.0	6.55
	2017-Apr	127	<0.50	<5.00	6.60
	2017-Apr	159	<0.50	<5.00	6.61
	2018-Apr	115	<0.50 D3	<5.00 D3	6.57
	2018-Oct	89.8	<0.10	3.40	6.23
	2019-Apr	95.7	<0.50 D3	<5.00 D3	6.63
	2019-Oct	140	<0.50 D3, M0	<5.00 D3	6.62
	2020-Apr	90.8	<0.48 D3	5.20 J, D3	6.60
	2020-Apr	145	<0.48	<2.20 D3	6.35
	2020-OC1 2021-Apr	121	<0.48 D3	<2.20 D3	6.54
	2021-Apr	121	<0.46 D3	\Z.20 D3	6.54
B-8R		2.250	0.26 J	30.0	6.64
D-OK	2016-Apr	,			
	2016-Oct	2,130	0.21 J	47.0	6.38
	2017-Apr	1,970	0.16 J	30.5	6.83
	2017-Oct	2,490	0.30 J	32.5	6.87
	2018-Apr	1,700	0.14 J	28.7	7.02
	2018-Oct	1,500	0.25 J	30.6	6.18
	2019-Apr	1,560	0.24 J	39.8	6.65
	2019-Oct	1,110	0.49	23.6	6.85
	2020-Apr	1,340	0.27 J	20.9	6.61
	2020-Oct	1,600	0.36	63.9	6.60
	2021-Apr	1,310	0.28 J	25.0	6.54
	2021-Oct	1,730	0.19 J	42.3	6.48
B-11A	2016-Apr	110	0.37 J	3.80 J	7.75
	2016-Oct	111	0.28 J	2.80 J	7.47
	2017-Apr	106	0.35	<1.00	7.38
	2017-Oct	97.7	0.34	8.30	7.91
	2018-Apr	89.4	0.30 J	12.70	8.04
	2018-Oct	142	0.16 J	5.30	7.43
	2019-Apr	94.0	0.29 J	1.90 J	7.62
	2019-Oct	82.3	0.27 J	<1.00	7.66
	2020-Apr	83.3	0.17 J	1.50 J	7.75
	2020-Apr	94.3	0.30 J	1.0 J	7.74
	2021-Apr	92.9	0.23 J	3.5	7.65
	2021-Oct	97.6	0.24 J	7.3	7.49
B-11B	2016-Apr	1,240	0.53	153	8.14
	2016-Oct	1,410	0.54	181	7.91
	2017-Apr	1,720	0.56	186	7.83
	2017-Oct	1,900	0.65	169	7.80
	2018-Apr	2,020	0.68	195	8.42
	2018-Oct	3,910	0.41	195	7.74
	2019-Apr	6,670	0.60	289	7.91
	2019-Oct	4,860	0.64	335	7.92
	2020-Apr	5,080	<0.095	362	7.89
	2020-Oct	3,190	<0.095	422	7.80
	2021-Apr	4,590	<0.095	389	8.07
	2021-Oct	2,480	0.49	468	7.72
B-11R		3.290	<1.00	93.9	6.98
אוו-ם	2016-Apr	-,	<0.50	115	6.77
	2016-Oct	4,070 3,710	<0.50		
	2017-Apr			111	7.11
	2017-Oct	3,400	<0.50	94.0	6.75
	2018-Apr	2,790	<0.50 D3	78.6	7.14
	2018-Oct	635	0.14 J	15.6	6.55
	2019-Apr	1,310	0.19 J	34.5	6.82
	2019-Oct	1,500	0.28 J	39.2	6.83
	2020-Apr	2,250	<0.48 D3	39.8	6.80
	2020-Oct	2,690	<0.48	23.0	6.83
	2021-Apr	2,890	<0.48 D3	59.9	7.11
	2021-Oct	3050	<0.48 D3	61.6	6.86
B-26	2016-Apr	37.0	<0.20	40.1	7.43
-	2016-Oct	48.7	0.12 J	34.4	7.19
	2017-Apr	37.3	<0.10	32.3	7.54
	2017-Apr 2017-Oct	44.5	<0.10	25.0	7.35
	2017-001	44.5			
	2010 4		<0.10	19.2	7.64
	2018-Apr			24.9	7.20
	2018-Oct	55.2	<0.10		
	2018-Oct 2019-Apr	55.2 41.8	<0.10	26.4	7.10
	2018-Oct	55.2			
	2018-Oct 2019-Apr	55.2 41.8	<0.10	26.4	7.10
	2018-Oct 2019-Apr 2019-Oct	55.2 41.8 50.8	<0.10 0.11 J	26.4 37.0 29.1	7.10 7.24 7.27
	2018-Oct 2019-Apr 2019-Oct 2020-Apr	55.2 41.8 50.8 49.2	<0.10 0.11 J <0.095	26.4 37.0	7.10 7.24

Table 4. Analytical Results - State Monitoring Program Nelson Dewey Generating Station Cassville, Wisconsin / SCS Engineers Project #25221071.00

WELL ID	SAMPLE MONTH	BORON, DISSOLVED (UG/L)	FLUORIDE, DISSOLVED (MG/L)	SULFATE, DISSOLVED (MG/L)	PH, FIELD (STANDARD UNITS)
B-26A	2016-Apr	33.1	<0.20	40.1	7.06
	2016-Oct	30.5	0.14 J	39.9	7.26
	2017-Apr	52.6	0.47	42.3	7.96
	2017-Oct	28.4	<0.10	38.4	7.44
	2018-Apr	27.6	<0.10	37.0	7.47
	2018-Oct	18.4	<0.10	33.3	7.38
	2019-Apr	27.6	0.11 J	27.0	7.35
	2019-Oct	47.0	0.14 J	35.6	7.31
	2020-Apr	37.7	<0.095	39.2 MO	7.38
	2020-Oct	33.5	< 0.095	44.7	7.51
	2021-Apr	42.7	< 0.095	45.5	7.26
	2021-Oct	36.4	< 0.095	49.7	7.45
B-31A	2016-Apr	69.4	0.22 J	22.8	7.63
5 0171	2016-Oct	81.0	0.18 J	27.9	7.54
	2017-Apr	80.3	0.19 J	30.8	7.83
	2017-Oct	61.5	0.21 J	26.2	7.60
	2018-Apr	69.3	0.17 J	28.1	8.00
	2018-Oct	103	0.14 J	26.2	7.48
	2019-Apr	86.0	0.22 J	21.6	7.61
	2019-Oct	112	0.23 J	22.5	7.69
	2020-Apr	121	0.15 J	17.7	7.71
	2020-Apr	146	0.18 J	16.8	7.71
	2020-OC1 2021-Apr	168	0.14 J	17.1	7.70
	2021-Apr	188	0.14 J	15.0	7.58
B-31R	2016-Apr	759	<0.20	34.3	6.76
D-01K	2016-Oct	956	0.16 J	48.5	6.53
	2017-Apr	910	0.10 J	42.9	6.80
	2017-Apr	618	0.12 J	23.2	6.78
	2017-OC1 2018-Apr	520	0.20 J	23.3	6.76
	2018-Apr	1,530	<1.00 D3	179	6.41
	2019-Apr	892	0.17 J, D3	114	6.62
	2019-Apr	1,000	0.17 J, D3	145	6.72
	2020-Apr	765	0.28 J, M0	97.6 MO	6.79
	2020-Apr	696	0.28 J	50.8	6.89
	2020-OC1 2021-Apr	597	0.19 J	44.9	6.91
	2021-Apr	356	<0.48	25.1	6.83
B-35	2016-Apr	38.7	<0.20	8.10	6.89
D-00	2016-Apr	46.4	0.10 J	6.50	6.86
		54.4	0.10 J	7.70	6.68
	2017-Apr	40.8	0.13 J	3.80	7.65
	2017-Oct	28.9	<0.10 M0	4.80 M0	7.01
	2018-Apr 2018-Oct	40.0	0.13 J	3.60	6.58
				4.90	7.26
	2019-Apr 2019-Oct	33.6 41.0	<0.10 0.12 J	5.60	7.26
	2019-OC1 2020-Apr	27.0	<0.095	4.20	6.87
		27.0			
	2020-Oct		0.097 J	5.60	6.85
	2021-Apr	23.8	0.12 J	5.90	6.89
B-35A	2021-Oct	21.7	<0.20	26.2	6.96
D-33A	2016-Apr	21./			
	2016-Oct 2017-Apr	23.4	0.16 J <0.10	27.4 25.4	7.17 7.27
	2017-Apr 2017-Oct	29.9 51.4	0.10 0.26 J	4.00	7.27
		28.9	<0.10 M0	23.1	7.44
	2018-Apr				
	2018-Oct	59.8	<0.50 D3	6.00 J, D3	6.95
	2019-Apr	30.3	0.12 J	16.7	7.30
	2019-Oct	33.7	0.13 J	18.9	7.30
	2020-Apr	32.1	0.12 J	20.2	7.29
	2020-Oct	70.7	<0.095	17.8	7.39
	2021-Apr	46.8	<0.095	18.9	7.26
D. C.	2021-Oct	52.7	<0.095	18.7	7.27
B-36	2021-Oct	24.7	0.13 J	2.80	7.34
B-36A	2021-Oct	20.7	<0.095	17.6	7.43

Abbreviations:

- J: Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
- D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference. M0: Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.

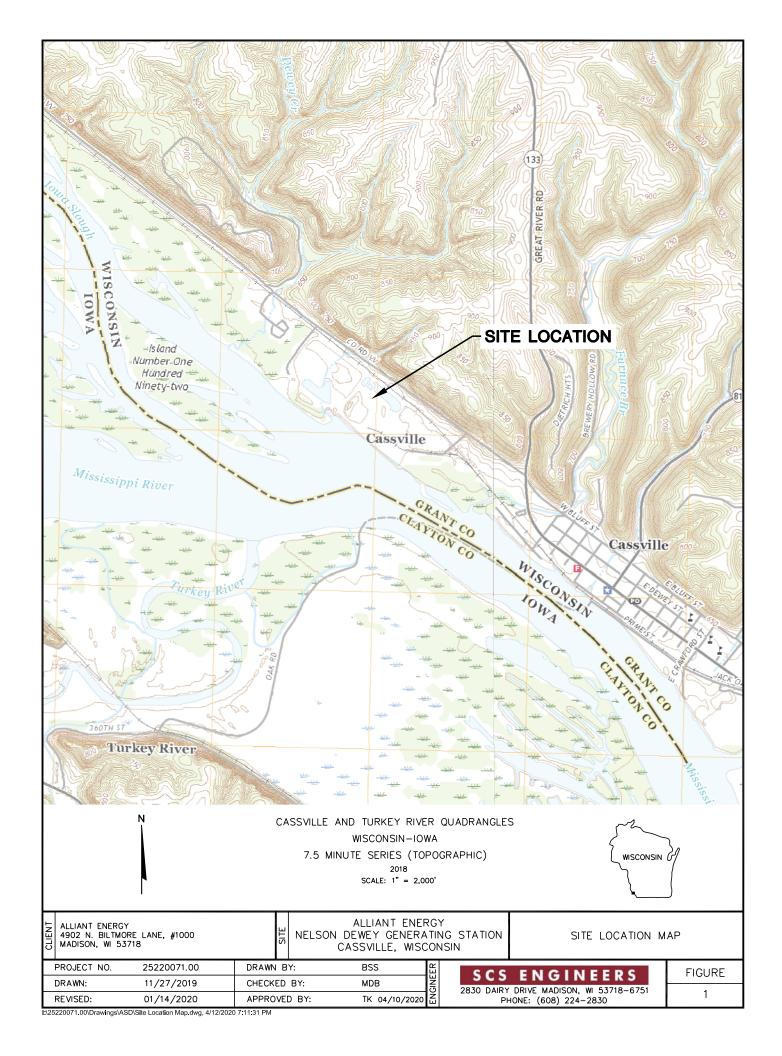
Notes:

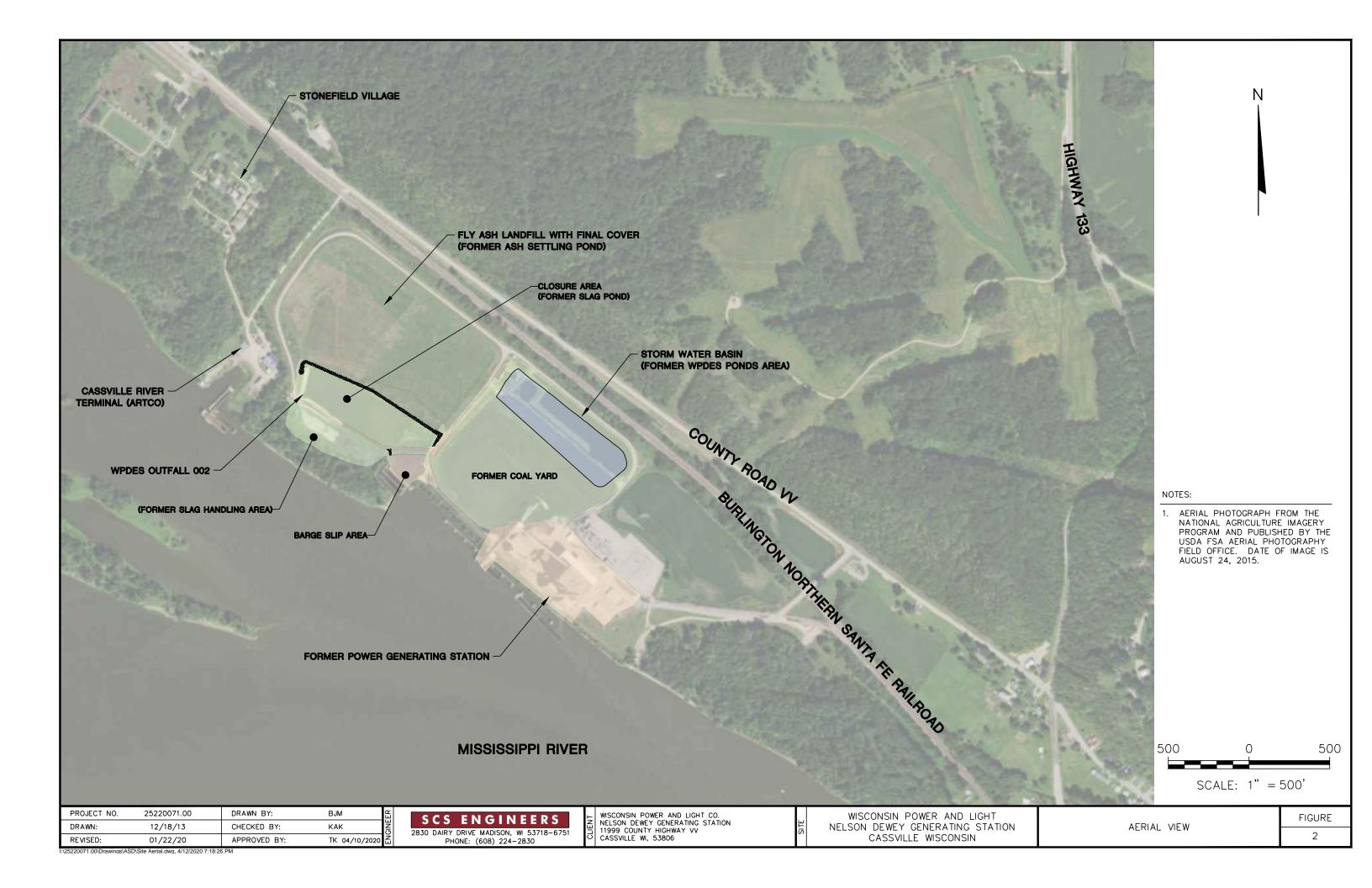
- (1) B-7R and B-35 were dry during October sampling event.
- (2) B-37 and B-37A were abandoned 12/6/2022. B-36 and B-36A were added prior to the October 2021 Sampling event.

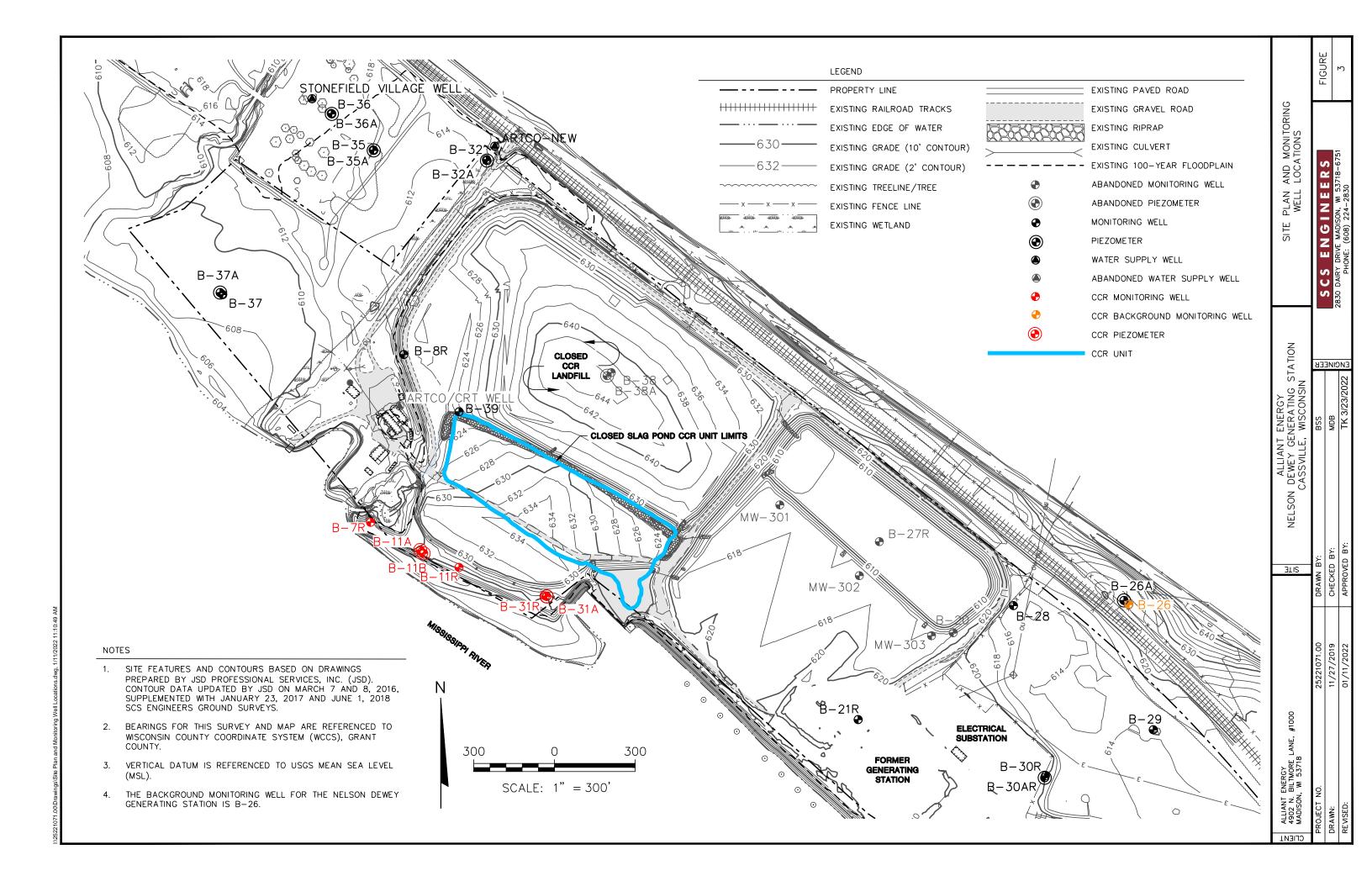
Created by: JSN	Date: 12/29/2017
Last revision by: RM/NDK	Date: 2/8/2022/3/17/2022
Checked by: JAO	Date: 3/18/2022

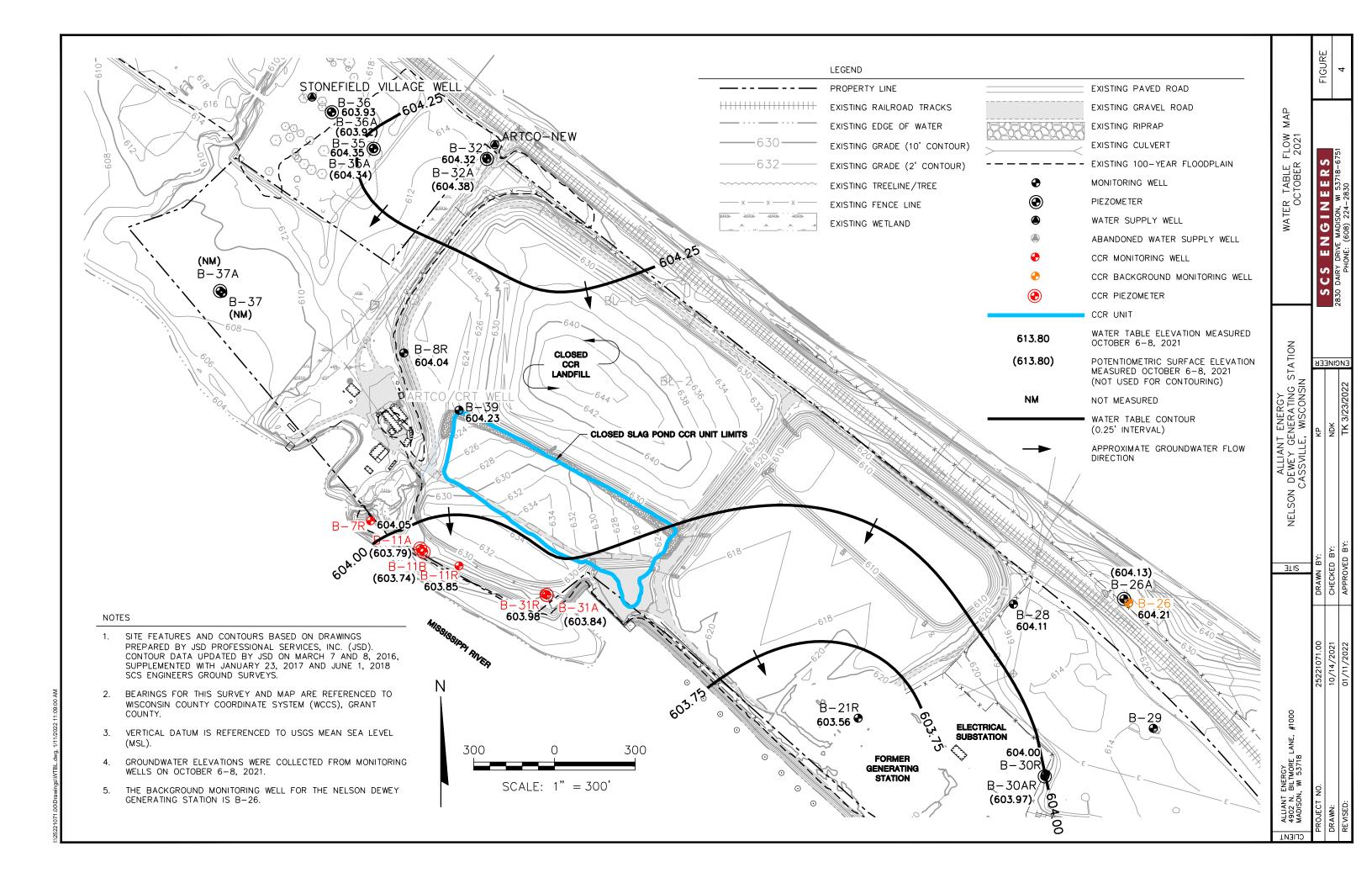
Figures

- 1 Site Location Map
- 2 Aerial View
- 3 Site Plan and Monitoring Well Locations
- 4 Water Table Flow Map October 2021



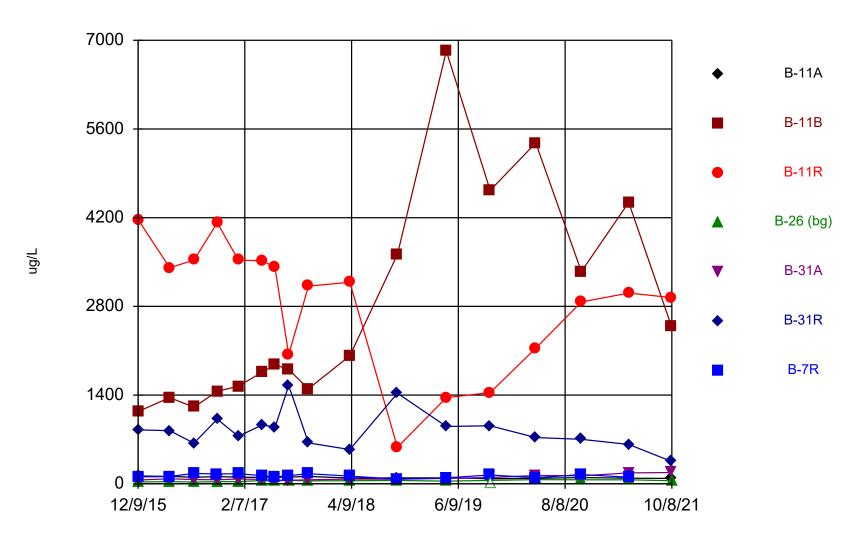






Appendix A CCR Well Trend Plots

Boron

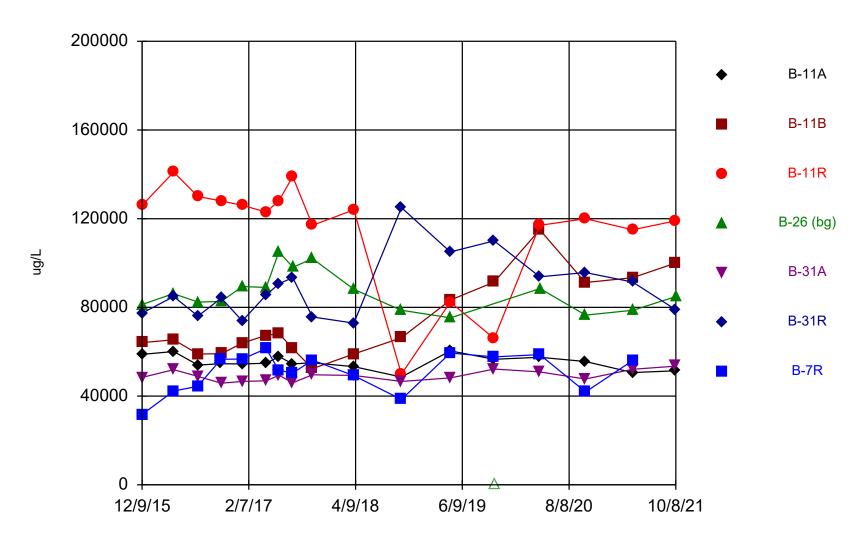


Time Series Analysis Run 2/8/2022 1:00 PM

Time Series

		. 10.001.	Dono, donordang	0.0	o Enginosio Data	2. 1122 O.I.O.I.I.POIII.	5.Port 2-02-02-0
	B-11A	B-11B	B-11R	B-26 (bg)	B-31A	B-31R	B-7R
12/9/2015	124	1140	4170	29.6	59	851	110
4/12/2016				33.7			
4/13/2016	116	1360	3410		79.2	838	115
7/18/2016							164
7/19/2016	104	1210	3530	28.6	67.2	641	
10/19/2016	112						154
10/20/2016		1460	4120	33	63.7	1020	
1/12/2017	106	1540	3530	35.2	76.4	749	159
4/17/2017	100	1760	3520	50.1	69.9	929	129
6/7/2017			3420	45.8			110
6/8/2017	102	1880			58.5	895	
8/1/2017	105	1800	2040		56.3	1550	129
8/2/2017				54.6			
10/19/2017	116	1500	3120	47.4	63.9	645	159
4/2/2018	91	2020	3180		74.8	540	121
4/3/2018				48			
10/8/2018				53.4			
10/9/2018	94.2	3620	576		71.8	1430	73
4/22/2019	93.9	6830	1360		86.2	906	93.5
4/23/2019				41.6			
10/14/2019	80.7	4630	1440		98.5	915	139
10/15/2019				<3 (UX)			
4/13/2020	86.3	5380	2140		132	730	96
4/14/2020				66.1			
10/12/2020	99.3	3350	2870		127	702	
10/13/2020				63.6			145
4/19/2021	88.1	4440	3010		172	621	
4/20/2021							104
4/21/2021				63.6			
10/7/2021	85.4	2480	2940		178	353	
10/8/2021				48.4			

Calcium



Time Series Analysis Run 2/8/2022 1:00 PM

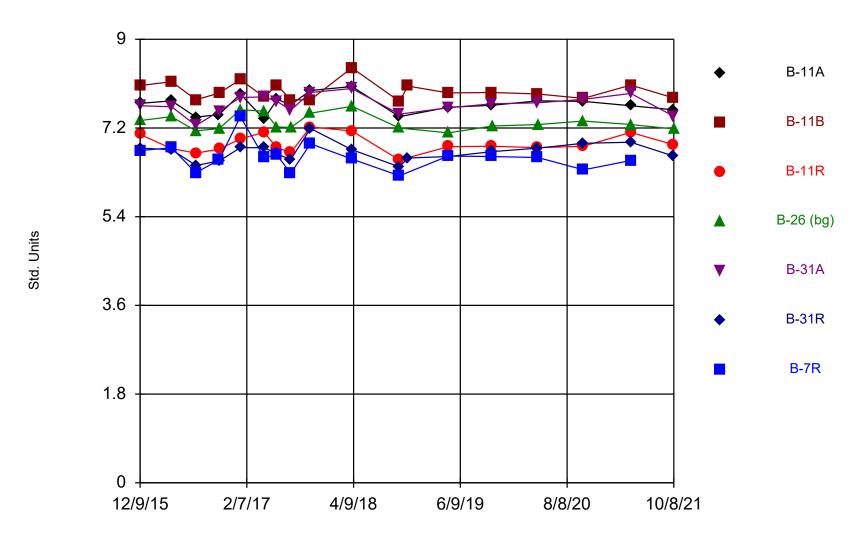
Time Series

Constituent: Calcium (ug/L) Analysis Run 2/8/2022 1:02 PM

Nelson Dewey Generating Station Client: SCS Engineers Data: NED - Chempoint- export-Dec2020

	B-11A	B-11B	B-11R	B-26 (bg)	B-31A	B-31R	B-7R
12/9/2015	58800	64100	126000	81300	48400	77400	31700
4/12/2016				86200			
4/13/2016	60100	65400	141000		51900	84900	42300
7/18/2016							44400
7/19/2016	54000	59000	130000	82400	48900	76100	
10/19/2016	54600						56600
10/20/2016		59100	128000	82700	45800	84200	
1/12/2017	54500	63900	126000	89400	46600	73900	56700
4/17/2017	54800	67400	123000	89000	46900	85600	61400
6/7/2017			128000	105000			51600
6/8/2017	57800	68200			49400	90700	
8/1/2017	54500	61400	139000		46000	93400	50400
8/2/2017				98100			
10/19/2017	55000	52400	117000	102000	49600	75700	56200
4/2/2018	53300	59000	124000		49300	72900	49200
4/3/2018				88100			
10/8/2018				78700			
10/9/2018	48600	66300	49900		46600	125000	38500
4/22/2019	60400	83300	82400		48200	105000	59400
4/23/2019				75300			
10/14/2019	56600	91400	66000		52200	110000	57700
10/15/2019				<76.2 (UX)			
4/13/2020	57500	115000	117000		50900	93800	58700
4/14/2020				88500			
10/12/2020	55600	91200	120000		47700	95700	
10/13/2020				76500			41900
4/19/2021	50600	93400	115000		52100	91400	
4/20/2021							56100
4/21/2021				78700			
10/7/2021	51400	100000	119000		53500	79000	
10/8/2021				84900			

Field pH



Time Series Analysis Run 2/8/2022 1:00 PM

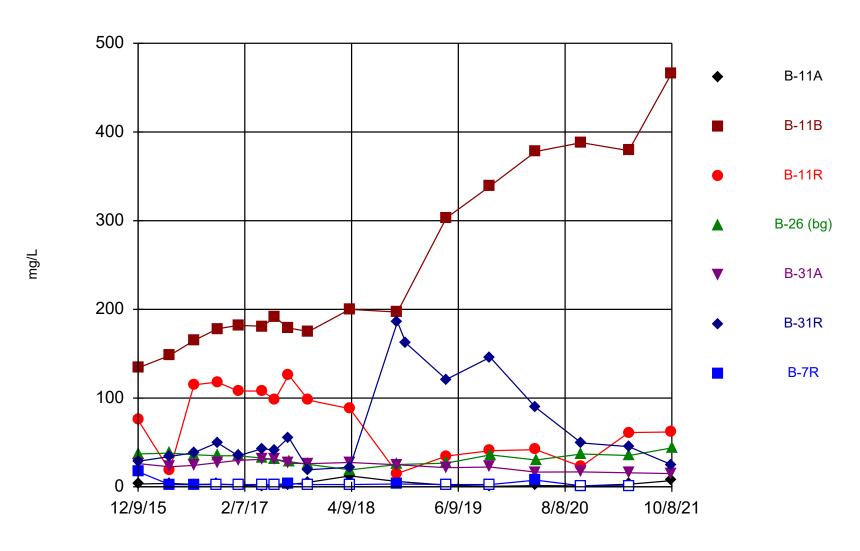
Time Series

Constituent: Field pH (Std. Units) Analysis Run 2/8/2022 1:02 PM

Nelson Dewey Generating Station Client: SCS Engineers Data: NED - Chempoint- export-Dec2020

				,		g		
		B-11A	B-11B	B-11R	B-26 (bg)	B-31A	B-31R	B-7R
1	2/9/2015	7.7	8.06	7.07	7.35	7.65	6.79	6.74
4	/12/2016				7.43			
4	/13/2016	7.75	8.14	6.78		7.63	6.76	6.8
7	//18/2016							6.29
7	//19/2016	7.42	7.77	6.69	7.14	7.25	6.44	
1	0/19/2016	7.47						6.55
1	0/20/2016		7.91	6.77	7.19	7.54	6.53	
1	/12/2017	7.89	8.18	6.98	7.57	7.82	6.8	7.43
4	/17/2017	7.38	7.83	7.11	7.54	7.83	6.8	6.6
6	6/7/2017			6.8	7.22			6.65
6	6/8/2017	7.78	8.07			7.74	6.67	
8	3/1/2017	7.67	7.77	6.7		7.56	6.56	6.28
8	3/2/2017				7.21			
1	0/19/2017	7.96	7.77	7.22	7.5	7.92	7.19	6.88
4	/2/2018	8.04	8.42	7.14		8	6.76	6.57
4	/3/2018				7.64			
1	0/8/2018				7.2			
1	0/9/2018	7.43	7.74	6.55		7.48	6.41	6.23
1	1/12/2018		8.05				6.59	
4	/22/2019	7.62	7.91	6.82		7.61	6.62	6.63
4	/23/2019				7.1			
1	0/14/2019	7.66	7.92	6.83		7.69	6.72	6.62
1	0/15/2019				7.24			
4	/13/2020	7.75	7.89	6.8		7.71	6.79	6.6
4	/14/2020				7.27			
1	0/12/2020	7.74	7.8	6.83		7.78	6.89	
1	0/13/2020				7.34			6.35
4	/19/2021	7.65	8.07	7.11		7.9	6.91	
4	/20/2021							6.54
4	/21/2021				7.27			
1	0/7/2021	7.57	7.81	6.86		7.44	6.63	
1	0/8/2021				7.18			

Sulfate



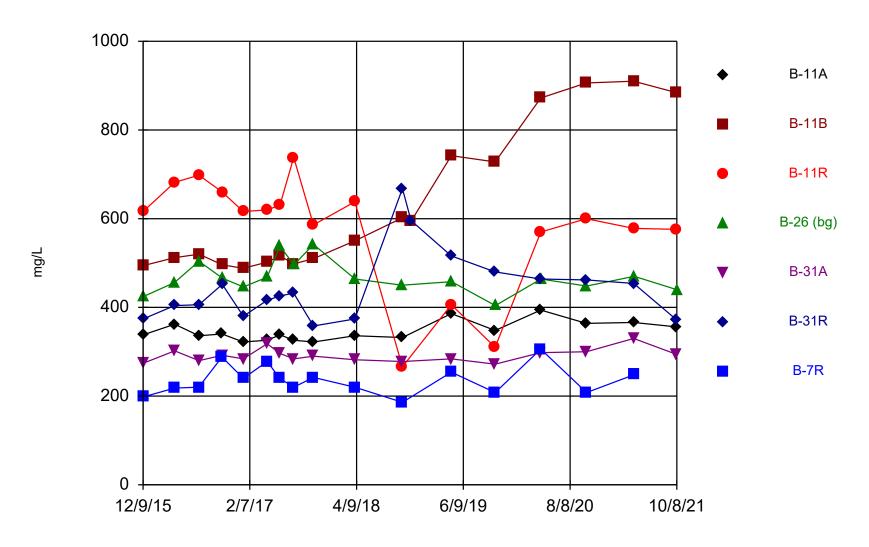
Time Series Analysis Run 2/8/2022 1:00 PM

Time Series

Constituent: Sulfate (mg/L) Analysis Run 2/8/2022 1:02 PM

				ou : ounate (mg/			. D. 0000
		Nelsor	Dewey Generating	Station Client: SC	US Engineers Data	a: NED - Chempoint	- export-Dec2020
	B-11A	B-11B	B-11R	B-26 (bg)	B-31A	B-31R	B-7R
12/9/2015	3.2 (J)	134	75.4	37.1	26.2	28.8	17 (J)
4/12/2016				38			
4/13/2016	3.8 (J)	148	18.4		22.6	34.1	2.5 (J)
7/18/2016							2.4 (J)
7/19/2016	2.7 (J)	165	115	36.2	24.2	38.5	
10/19/2016	3 (J)						<5 (U)
10/20/2016		178	118	35	27.2	49.7	
1/12/2017	2.3 (J)	182	108	35	29.8	34.9	<5 (U)
4/17/2017	<1 (U)	181	108	32.4	31	43	<5 (U)
6/7/2017			98.2	31			<5 (U)
6/8/2017	1.4 (J)	191			31.2	41.1	
8/1/2017	2.4 (J)	179	126		26.6	55.6	3.7
8/2/2017				28.5			
10/19/2017	5.1	175	97.7	25.3	26.1	19.2	<5 (U)
4/2/2018	12.3	200	88.1		27.4	22	<5 (U)
4/3/2018				19.1			
10/8/2018				25.1			
10/9/2018	6	197	15.1		24.8	186	3.2
11/12/2018						162	
4/22/2019	1.9 (J)	303	34.6		21.6	121	<5 (U)
4/23/2019				26.7			
10/14/2019	<1 (U)	339	40.7		22.3	146	<5 (U)
10/15/2019				36			
4/13/2020	1.4 (J)	378	41.9		16.6	89.4	7.5 (J)
4/14/2020				30.2			
10/12/2020	1 (J)	388	22.8		16.8	49.4	
10/13/2020				37			<2.2 (U)
4/19/2021	2.9	379	61.2		15.8	45.3	
4/20/2021							<2.2
4/21/2021				35.3			
10/7/2021	7	466	61.8		14.9	24.9	
10/8/2021				43.8			

Total Dissolved Solids



Time Series Analysis Run 2/8/2022 1:00 PM

Time Series

Constituent: Total Dissolved Solids (mg/L) Analysis Run 2/8/2022 1:02 PM

Nelson Dewey Generating Station Client: SCS Engineers Data: NED - Chempoint- export-Dec2020

B-11A B-11B B-11R B-26 (bg) B-31A B-31R 12/9/2015 4/12/2016 4/13/2016 7/18/2016 7/19/2016 10/19/2016 10/20/2016 1/12/2017 4/17/2017 6/7/2017 6/8/2017 8/1/2017 8/2/2017 10/19/2017 4/2/2018 4/3/2018 10/8/2018 10/9/2018 11/12/2018 4/22/2019 4/23/2019 10/14/2019 10/15/2019 4/13/2020 4/14/2020 10/12/2020 10/13/2020 4/19/2021 4/20/2021 4/21/2021 10/7/2021 10/8/2021

Appendix B 1994 RMT Environmental Contamination Assessment Information

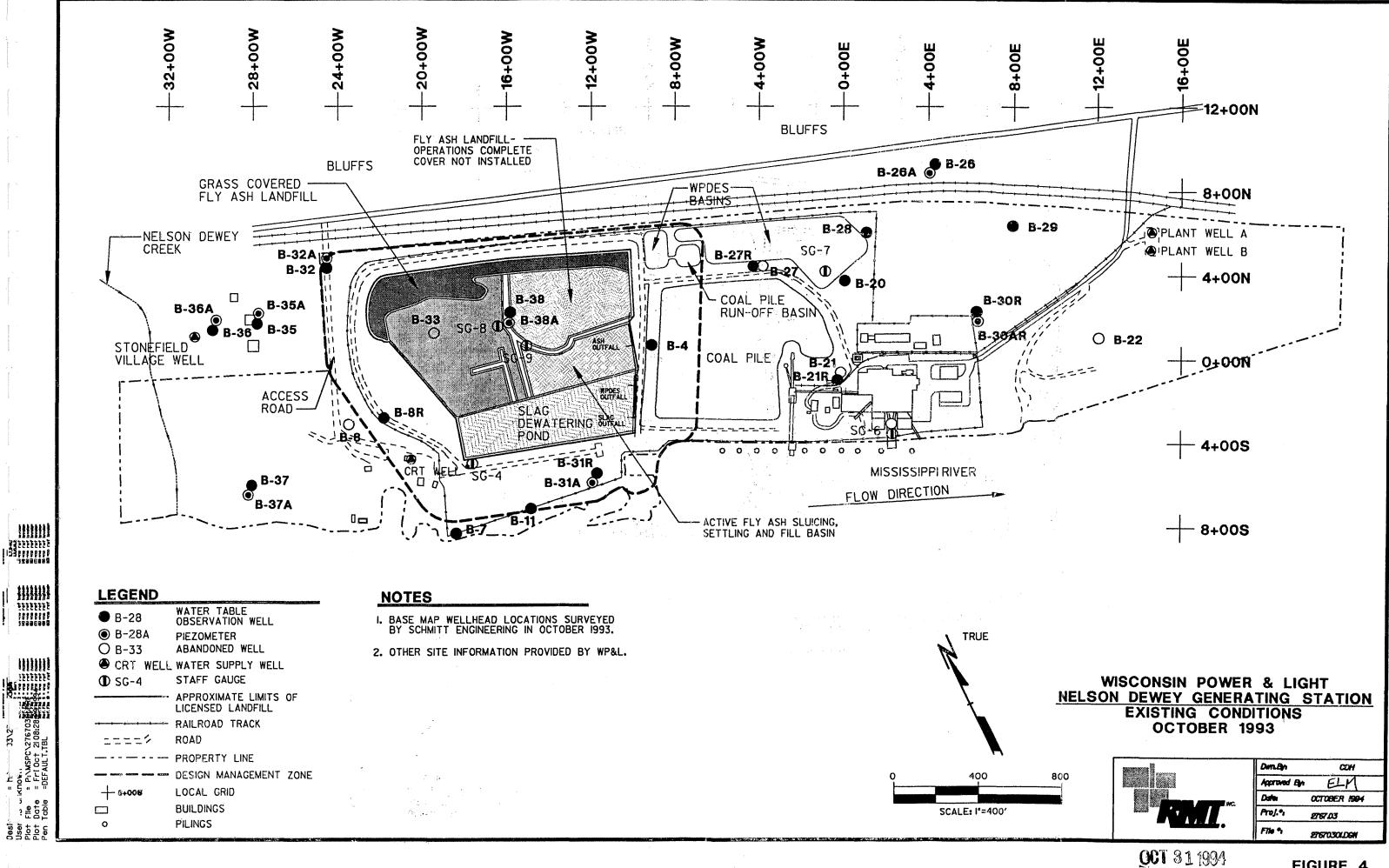


TABLE 5 **SUMMARY OF LEACHING TEST RESULTS**

	Fly	Fly Ash							
Year	1983	1990 to 1992	1987 to 1992						
Coal Type	Eastern (and Western)	Western (and Eastern)	Western (and Eastern) i						
Water:Solid Ratio	2:1	4:1	4:1						
Extraction Time	24 hours	48 hours	48 hours						
Number of Samples	1	3	6						
Arsenic (mg/L)	< 0.001	0.05 to 2.02	< 0.002 to 0.081						
Selenium (mg/L)	NA	0.42 to 160	< 0.002 to 0.045						
Boron (mg/L)	420	4.63 to 37.34	< 0.010 to 1.05						
Iron (mg/L)	NA	NA NA	< 0.02 to 0.98						
Sulfate (mg/L)	13,070	2,000 to 16,700	2.0 to < 5.0						
pH (SU)	6.6	10.3 to 12.5	5.6 to 9.9						

NOTES:

- 1983 fly ash leaching data from RMT (1984); remaining leaching data provided by WP&L. NA = Not Analyzed. 1.
- 2.

BEGINNING DATE: 01-JUN-93

07-SEP-93 ENDING DATE:

TABLE 6 SLAG AND ASH BASIN CHEMISTRY

FLY ASH BASIN

SLAG BASIN

07-SEP-93

3300

60

11

07-SEP-93

DADAMETED

3302-011

PARAMETER	UN115 33	3302-010	
COLOR, FIELD		CLEAR	CLEAR
CONDUCTANCE, SPECIFIC	UMHOS/CM	5190	400
ODOR, FIELD		NONE	NONE
PH, FIELD	SU	8.1	7.4
TEMPERATURE	DEG C	17	18
TURBIDITY, FIELD		SLIGHT	SLIGHT
ALKALINITY AS CACO3	MG/L	230	160
HARDNESS AS CACO3	MG/L	930	200
SOLIDS, TOTAL DISSOLVED	MG/L	410	300

MG/L

UG/L

UG/L

UG/L

UG/L

UG/L

UG/L

UG/L

ARSENIC, TOTAL

BARIUM, TOTAL

BORON, TOTAL

CADMIUM, TOTAL

CHROMIUM, TOTAL IRON, TOTAL LEAD, TOTAL

MERCURY, TOTAL UG/L SELENIUM, TOTAL UG/L SILVER, TOTAL UG/L

3302-010

270 2300 210 5.4 0.30 < 10 1600 2000

< 3.0 < 3.0 0.20 0.20

36 I 2.1 < 1.0 < 1.0

L

PAGE 1

18-OCT-94

wpvalid:SWI.BJC

BEGINNING DATE: 01-JUN-93

ENDING DATE:

29-OCT-93

TABLE 8 GROUNDWATER CHEMISTRY

B-04 B-04 B-07 ND B-07 ND B-08 B-08R 01-JUN-93 07-SEP-93 01-JUN-93 07-SEP-93 01-JUN-93 07-SEP-93 UNITS 1670-015 3293-010 1670-020 3302-004 1670-001 3293-009 **PARAMETER CLEAR** CLEAR CLEAR **CLEAR** CLEAR COLOR, FIELD CLEAR 1160 1240 460 550 670 UMHOS/CM 1160 CONDUCTANCE, SPECIFIC 16.12 DEPTH TO WATER FEET 9.90 12.75 12.83 5.68 20.13 NONE NONE NONE NONE NONE ODOR, FIELD NONE PH, FIELD SU 7.3 7.5 7.0 6.9 7.1 6.8 DEG C 15 10 14 12 15 7 **TEMPERATURE** NONE NONE SLIGHT SLIGHT NONE TURBIDITY, FIELD MODERATE FEET 610.68 607.83 610.97 607.68 610.51 WATER ELEVATION 72 92 . 160 190 ALKALINITY AS CACO3 MG/L 220 440 CHLORIDE MG/L 18 23 17 15 9.4 2.8 COD MG/L MG/L ₽.58 5.5 0.26 0.32 FLUORIDE 0.10 0.12 220 MG/L 120 210 250 HARDNESS AS CACO3 370 620 MG/L 0.15 0.33 0.050 0.050 0.050 NITROGEN, NITRATE + NITRITE < 4.2 900 300 SOLIDS, TOTAL DISSOLVED MG/L 940 360 460 770 SULFATE MG/L 500 560 74 100 180 180 3.0 3.0 ARSENIC, DISSOLVED UG/L < 3.0 < 3.0 3.0 3.0 68 73 BARIUM, DISSOLVED UG/L < 50 61 63 50 UG/L 1900 4200 230 200 2200 BORON, DISSOLVED < 9400 CADMIUM, DISSOLVED UG/L < 0.30 < 0.30 0.30 < 0.30 0.30 0.38 < UG/L < 10 10 10 < CHROMIUM, DISSOLVED < 10 10 10 UG/L < 20 < 20 < 20 < 20 20 COPPER, DISSOLVED 20 < < 720 890 2800 IRON, DISSOLVED UG/L 4100 100 100 UG/L < 3.0 < 3.0 LEAD, DISSOLVED < 3.0 < 3.0 < 3.0 < 3.0 MANGANESE, DISSOLVED UG/L 1200 720 970 1500 17 3400 UG/L < 0.20 < 0.20 MERCURY, DISSOLVED 0.20 0.20 < 0.20 < 0.20 UG/L 6.9 3.2 1.0 < 1.0 SELENIUM, DISSOLVED L Ł 1.0 L 34 UG/L < 1.0 1.0 1.0 1.0 SILVER, DISSOLVED < < 1.0 < 1.0 UG/L 1000 100 22 < 20 ZINC, DISSOLVED 220 < 20

BEGINNING DATE: 01-JUN-93

TABLE 8
GROUNDWATER CHEMISTRY

ENDING DATE: 2

29-OCT-93

PARAMETER	UNITS	B-11 07-SEP-93 X0001		11 -0CT-93 35-001		B-20 07-SEP-93 x0002		26 Jun-93 70-022			26 -SEP-93 02-005		01	26A - Jun-93 70-023	
COLOR, FIELD								CLEAR			CLEAR			CLEAR	
CONDUCTANCE, SPECIFIC	UMHOS/CI	M 1500				310		610			670			660	
DEPTH TO WATER	FEET	15.91				10.81		16.22			18.85			16.20	
ODOR, FIELD								NONE			NONE			NONE	
PH, FIELD	SU							7.1			7.2			7.0	
TEMPERATURE	DEG C	13		13		14		14			11			15	
TURBIDITY, FIELD								NONE			SLIGHT			NONE	
WATER ELEVATION	FEET							610.18			607.55			610.19	
ALKALINITY AS CACO3	MG/L			470				320			300			340	
CHLORIDE	MG/L							21			43			33	
COD	MG/L														
FLUORIDE	MG/L						<	0.10			0.15		<	0.10	
HARDNESS AS CACO3	MG/L			810				390			410			400	
NITROGEN, NITRATE + NITRITE	MG/L							2.6			4.9			2.0	
SOLIDS, TOTAL DISSOLVED	MG/L			520				440			450			450	
SULFATE	MG/L			360				34			34			33	
ARSENIC, DISSOLVED	UG/L			8.4			<	3.0		<	3.0		<	3.0	
BARIUM, DISSOLVED	UG/L			100				62			68			96	
BORON, DISSOLVED	UG/L			5100			<	200		<	200		<	200	
CADMIUM, DISSOLVED	UG/L		<	0.30			<	0.30		<	0.30		<	0.30	
CHROMIUM, DISSOLVED	UG/L		<	10			<	10		<	10		<	10	
COPPER, DISSOLVED	UG/L						<	20		<	20		<	20	
IRON, DISSOLVED	UG/L			55000			<	100		<	100		<	100	
LEAD, DISSOLVED	UG/L		<	3.0			<	3.0		<	3.0		<	3.0	
MANGANESE, DISSOLVED	UG/L						<	5.0		<	5.0		<	5.0	
MERCURY, DISSOLVED	UG/L		<	0.20			<	0.20		<	0.20		<	0.20	
SELENIUM, DISSOLVED	UG/L		<	1.0	LNP		<	1.0	L	<	1.0	L	<	1.0	L
SILVER, DISSOLVED	UG/L		<	10			<	1.0		<	1.0		<	1.0	
ZINC, DISSOLVED	UG/L						<	20		<	20		<	20	

PROJECT NUMBER: 1831.28

REGINNING DATE: 01-JUN-93

TABLE 8 GROUNDWATER CHEMISTRY

REGINN	ING DATE:	01-30H 33
ENDING	DATE:	29-0CT-93

DEPTH TO WATER FOODOR, FIELD	MHOS/CI EET U EG C		CLEAR 440 18.84		370		CLEAR							
DEPTH TO WATER FOODOR, FIELD	EET	M	18.84		370					CLEAR			CLEAR	,
ODOR, FIELD	U						190			230	360		220	
•					14.67		6.40			9.08	9.57		12.33	
			NONE				NONE			NONE			NONE	
PH, FIELD SI	FG C		7.2				6.1			6.0			7.2	
TEMPERATURE D			11		14		17			15	15		17	
TURBIDITY, FIELD			NONE				SLIGHT			MODERATE			NONE	
WATER ELEVATION F	EET		607.55				610.46			607.74	607.26		610.11	
ALKALINITY AS CACO3	G/L		340				26			54			200	
CHLORIDE M	G/L		25				4.6			11			13	
COD M	G/L												7.3	
FLUORIDE M	G/L		0.15			<	0.10		<	0.10			0.10	
HARDNESS AS CACO3	G/L		410				82			110			220	
NITROGEN, NITRATE + NITRITE M	G/L		1.8				2.7			0.60		<	0.050	
SOLIDS, TOTAL DISSOLVED M	G/L		440				140			160			280	
SULFATE M	G/L		38				45			42			27	
ARSENIC, DISSOLVED U	G/L	<	3.0			<	3.0		<	3.0		<	3.0	
BARIUM, DISSOLVED U	G/L		86			<	50			52		<	50	
BORON, DISSOLVED U	G/L	<	200			<	200		<	200		<	200	
CADMIUM, DISSOLVED U	G/L	<	0.30			<	0.30		<	0.30		<	0.30	
CHROMIUM, DISSOLVED U	G/L	<	10			<	10		<	10		<	10	
COPPER, DISSOLVED U	G/L	<	20			<	20		<	20		<	20	
IRON, DISSOLVED U	G/L	<	100				210		<	100		<	100	
LEAD, DISSOLVED U	G/L	<	3.0			<	3.0		<	3.0		<	3.0	
MANGANESE, DISSOLVED U	G/L	<	5.0				8.6		<	5.0		<	5.0	
MERCURY, DISSOLVED U	G/L	<	0.20			<	0.20		<	0.20		<	0.20	
•	G/L	<	1.0	LN		<	1.0	L	<	1.0 L		<	1.0	L
•	G/L	<	1.0			<	1.0		<	1.0		<	1.0	
· ·	G/L	<	20			<			<	20		<	20	

BEGINNING DATE: 01-JUN-93

ENDING DATE: 29-OCT-93

TABLE 8 GROUNDWATER CHEMISTRY

PARAMETER	UNITS		30AR -SEP-93 02-002		01	30r - Jun-93 70-012		07	30R -SEP-93 02-001	01	31A -JUN-93 70-019		07	31A -SEP-93 93-011		01	31R - JUN-93 70-018		
COLOR, FIELD			CLEAR			CLEAR			CLEAR		CLEAR			CLEAR			CLEAR		- ,
CONDUCTANCE, SPECIFIC	UMHOS/	CM	410			420			360		700			800			640		
DEPTH TO WATER	FEET		15.37			12.25			15.17		12.21			15.93			11.56		
ODOR, FIELD			NONE			NONE			NONE		NONE			NONE			NONE		
PH, FIELD	SU		7.3			7.0			6.8		6.9			7.3			6.8		
TEMPERATURE	DEG C		12			16			14		17			14			17		
TURBIDITY, FIELD			NONE			MODERAT	E		MODERATE		NONE			SLIGHT			SLIGHT		
WATER ELEVATION	FEET		607.07			610.10			607.18		610.46			606.74			610.85		
ALKALINITY AS CACO3	MG/L		190			160			140		170			160			240		
CHLORIDE	MG/L		14			13			6.6		16			17			11		
COD	MG/L					9.7													
FLUORIDE	MG/L		0.16		<	0.10		<	0.10		0.39			0.43		<	0.10		
HARDNESS AS CACO3	MG/L		230			210			210		120			160			330		
NITROGEN, NITRATE + NITRITE	MG/L	<	0.050			8.5			8.8	<	0.050		<	0.050		<	0.050		
SOLIDS, TOTAL DISSOLVED	MG/L		280			280			230		510			570			510		
SULFATE	MG/L		25			25			26		250			250			150		
ARSENIC, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0	<	3.0		<	3.0		<	3.0		
BARIUM, DISSOLVED	UG/L	<	50		<	50		<	50		54			66			110		
BORON, DISSOLVED	UG/L	<	200		<	200		<	200		2900			2100			2900		
CADMIUM, DISSOLVED	UG/L	<	0.30		<	0.30		<	0.30	<	0.30		<	0.30			2.7		
CHROMIUM, DISSOLVED	UG/L	<	10		<	10		<	10	<	10		<	10		<	10		
COPPER, DISSOLVED	UG/L	<	20		<	20		<	20	<	20		<	20			110		
IRON, DISSOLVED	UG/L	<	100		<	100		<	100		210			300			450		
LEAD, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0	<	3.0		<	3.0		<	3.0		
MANGANESE, DISSOLVED	UG/L	<	5.0		<	5.0		<	5.0		4600			6000			440		
MERCURY, DISSOLVED	UG/L	<	0.20		<	0.20		<	0.20	<	0.20		<	0.20		<	0.20		
SELENIUM, DISSOLVED	UG/L	<	1.0	L		1.3	L		3.2	<	1.0	L	<	1.0	L		1.2	L	
SILVER, DISSOLVED	UG/L	<	1.0		<	1.0		<	1.0	<	1.0		<	1.0		<	1.0		
ZINC, DISSOLVED	UG/L	<			<	20		<	20	<	20		<	20			27		
• •	• •																		

TABLE 8 GROUNDWATER CHEMISTRY

BEGINN.	ING DAIL:	01-10M-A2
ENDING	DATE:	29-OCT-93

PARAMETER	UNITS		31R -SEP-93 93-012			52 - JUN-93 70-002			32 -SEP-93 93-016		01	32A - Jun-93 70-003		07	32A -SEP-93 93-017			35 - JUN-93 70-004	
COLOR, FIELD	-		CLEAR			CLEAR		_	CLEAR			CLEAR			CLEAR			L YLW/B	N
CONDUCTANCE, SPECIFIC	UMHOS/C	:M	480			300			330			610			1320			1070	
DEPTH TO WATER	FEET		14.44			3.37			6.22			3.59			6.46			10.10	
ODOR, FIELD			NONE			NONE			NONE			NONE			NONE			NONE	
PH, FIELD	SU		7.0			6.3			5.6			7.0			6.8			6.3	
TEMPERATURE	DEG C		15			13			14			13			14			12	
TURBIDITY, FIELD			MODERATE	E		SLIGHT			MODERAT	Έ		NONE			SLIGHT			SLIGHT	
WATER ELEVATION	FEET		607.97			610.80			607.95			610.81			607.94			610.66	
ALKALINITY AS CACO3	MG/L		190			140			140			330			320			190	
CHLORIDE	MG/L		11			6.7			6.9			7.0			7.6			110	
COD	MG/L																		
FLUORIDE	MG/L		0.18		<	0.10			0.12			0.12			0.19		<	0.10	
HARDNESS AS CACO3	MG/L		240			160			180			350			390			260	
NITROGEN, NITRATE + NITRITE	MG/L	<	0.050			0.68			1.2	•		1.1			1.3			36	
SOLIDS, TOTAL DISSOLVED	MG/L		340			200			240			380			420			800	
SULFATE	MG/L		71			11			16			29			30			35	
ARSENIC, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0		<	3.0		<	3.0			7.4	
BARIUM, DISSOLVED	UG/L		81			100			120			98			91			100	
BORON, DISSOLVED	UG/L		1100		<	200		<	200		<	200		<	200			210	
CADMIUM, DISSOLVED	UG/L		1.1		<	0.30			0.38		<	0.30			0.35		<	0.30	
CHROMIUM, DISSOLVED	UG/L	<	10		<	10		<	10		<	10		<	10		<	10	
COPPER, DISSOLVED	UG/L	<	20		<	20		<	20		<	20		<	20			21	
IRON, DISSOLVED	UG/L		210		<	100		<	100		<	100		<	100		<	100	
LEAD, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0		<	3.0		<	3.0		· <	3.0	
MANGANESE, DISSOLVED	UG/L		360		<	5.0			280			6.9			33		<	5.0	
MERCURY, DISSOLVED	UG/L	<	0.20		<	0.20		<	0.20		<	0.20		<	0.20		<	0.20	
SELENIUM, DISSOLVED	UG/L	<	1.0	L	<	1.0	L	<	1.0	L	<	1.0	L	<	1.0	L	<	1.0	L
SILVER, DISSOLVED	UG/L	<	1.0		<	1.0		<	1.0		<	1.0		<	1.0		<	1.0	
ZINC, DISSOLVED	UG/L	<	20		<	20		<	20		<	20		<	20		<	20	

PROJECT NUMBER: 1831.28

BEGINNING DATE: 01-JUN-93 ENDING DATE:

TABLE 8 GROUNDWATER CHEMISTRY

29-0CT-93

PARAMETER	UNITS		35 -SEP-93 93-002		01	35A - Jun-93 70-005		07	35A -SEP-93 93-003			36 - Jun-93 70-007			36 -SEP-93 93-004		01	36A - Jun-93 70-006	
			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,																·
COLOR, FIELD			YELLOW			CLEAR			CLEAR			CLEAR			CLEAR			CLEAR	'
CONDUCTANCE, SPECIFIC	UMHOS/0	CM	1050			620			680			430			500			620	
DEPTH TO WATER	FEET		13.13			10.55			13.57			10.86			13.97			11.11	
ODOR, FIELD			NONE			NONE			NONE			NONE			NONE			NONE	
PH, FIELD	รบ		6.8			7.0			7.1			6.3			7.0			7.1	
TEMPERATURE	DEG C		14			13			12			12			13			13	
TURBIDITY, FIELD			SLIGHT			NONE			NONE			SLIGHT			MODERAT	E		NONE	
WATER ELEVATION	FEET		607.63			610.63			607.61			610.60			607.49			610.35	
ALKALINITY AS CACO3	MG/L		210			330			320			230			210			330	
CHLORIDE	MG/L		80			26			24			4.4			25			12	
COD	MG/L																		
FLUORIDE	MG/L		0.19		<	0.10			0.13		<	0.10			0.14		<	0.10	
HARDNESS AS CACO3	MG/L		290			380			400			240			280			350	
NITROGEN, NITRATE + NITRITE	MG/L		39			1.7			2.0		<	0.050			1.4			0.83	
SOLIDS, TOTAL DISSOLVED	MG/L		770			480			460			280			350			400	
SULFATE	MG/L		43			33			37			15			18			36	
ARSENIC, DISSOLVED	UG/L		3.6		<	3.0		<	3.0		<	3.0		<	3.0		<	3.0	
BARIUM, DISSOLVED	UG/L		120		<	50			54			110			120			68	
BORON, DISSOLVED	UG/L		220		<	200		<	200		<	200		<	200		<	200	
CADMIUM, DISSOLVED	UG/L	<	0.30		<	0.30		<	0.30		<	0.30		<	0.30		<	0.30	
CHROMIUM, DISSOLVED	UG/L	<	10		<	10		<	10		<	10		<	10		<	10	
COPPER, DISSOLVED	UG/L		24		<	20		<	20		<	20		<	20		<	20	
IRON, DISSOLVED	UG/L	<	100		<	100		<	1 00		<	100		<	100		<	100	
LEAD, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0		<	3.0		<	3.0		<	3.0	
MANGANESE, DISSOLVED	UG/L	<	5.0		<	5.0	•	<	5.0		<	5.0			55		<	5.0	
MERCURY, DISSOLVED	UG/L	<	0.20		<	0.20		<	0.20		<	0.20		<	0.20		<	0.20	
SELENIUM, DISSOLVED	UG/L	<	1.0	L	<	1.0	L	<	1.0	L		1.0	L		2.6	L	<	1.0	L
SILVER, DISSOLVED	UG/L	<	1.0		<	1.0		<	1.0	-	<	1.0	_	<	1.0	_	<	1.0	_
ZINC, DISSOLVED	UG/L	<	20		<	20		<	20		<	20		· <	20		<	20	

PROJECT NUMBER: 1831.28

BEGINNING DATE: 01-JUN-93

TABLE 8 GROUNDWATER CHEMISTRY

ENDING DATE: 29-OCT-93							
		B-36A	B-37	B-37A	B-38	B-38	B-38A
		07-SEP-93	07-SEP-93	07-SEP-93	01-JUN-93	07-SEP-93	01-JUN-93
PARAMETER	UNITS	3293-005	3302-007	3302-008	1670-016	3293-006	1670-017
COLOR, FIELD		CLEAR	CLEAR	CLEAR	CLEAR	CLEAR	CLEAR
CONDUCTANCE, SPECIFIC	UMHOS/CM	620	510	770	3630	2830	2760
DEPTH TO WATER	FEET	14.18	8.13	8.14	18.53	20.19	24.87

PARAMETER	UNITS	329	3-005		33	02-007		33	02-008		16	70-016	329	93-006	167	70-017
COLOR, FIELD			CLEAR			CLEAR			CLEAR			CLEAR		CLEAR		CLEAR
CONDUCTANCE, SPECIFIC	UMHOS/CI	M	620			510			770			3630		2830		2760
DEPTH TO WATER	FEET		14.18			8.13			8.14			18.53		20.19		24.87
ODOR, FIELD			NONE			NONE			NONE			NONE		NONE		NONE
PH, FIELD	SU		7.1			7.3			7.3			8.3		9.9		7.7
TEMPERATURE	DEG C		11			13			11			20		20		15
TURBIDITY, FIELD			NONE			SLIGHT			NONE			NONE		SLIGHT		NONE
WATER ELEVATION	FEET		607.51			606.69			606.69			617.29		615.63		610.96
ALKALINITY AS CACO3	MG/L		330			200			190			100		420		80
CHLORIDE	MG/L		13			6.8			11			26		24		23
COO	MG/L												•			
FLUORIDE	MG/L		0.14		<	0.10		<	0.10			1.8		2.6		1.1
HARDNESS AS CACO3	MG/L		390			290			410			620		21		500
NITROGEN, NITRATE + NITRITE	MG/L		0.85			1.2		<	0.050			1.7		0.29		1.6
SOLIDS, TOTAL DISSOLVED	MG/L		420			380			590			3000		2200		2300
SULFATE	MG/L		36			100			240			2600		1200		2000
ARSENIC, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0			180		90		38
BARIUM, DISSOLVED	UG/L		68		<	50		<	50			110	<	50		58
BORON, DISSOLVED	UG/L	<	200			3100			7400			2500		2600		2200
CADMIUM, DISSOLVED	UG/L	<	0.30		<	0.30		<	0.30		<	0.30	<	0.30	<	0.30
CHROMIUM, DISSOLVED	UG/L	<	10		<	10		<	10			68	<	10		52
COPPER, DISSOLVED	UG/L	<	20		<	20		<	20		<	20	<	20	<	20
IRON, DISSOLVED	UG/L	<	100		<	100		<	100		<	100	<	100	<	100
LEAD, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0	•	<	3.0	<	3.0	<	3.0
MANGANESE, DISSOLVED	UG/L	<	5.0		<	5.0			55		<	5.0	<	5.0	<	5.0
MERCURY, DISSOLVED	UG/L	<	0.20		<	0.20		<	0.20		<	0.20	<	0.20	<	0.20
SELENIUM, DISSOLVED	UG/L	<	1.0	L	<	1.0	L	<	1.0	L		57		320		22
SILVER, DISSOLVED	UG/L	<	1.0		<	1.0		<	1.0		<	1.0	<	1.0	<	1.0
ZINC, DISSOLVED	UG/L	<	20		<	20		< ,	20		<	20	<	20	<	20

PROJECT NUMBER: 1831.28

BEGINNING DATE: 01-JUN-93

ENDING DATE:

29-0CT-93

B-38A

07-SEP-93

PARAMETER

UNITS 3293-007

COLOR, FIELD			CLEAR
CONDUCTANCE, SPECIFIC	UMHOS/CM		3280
DEPTH TO WATER	FEET		27.59
ODOR, FIELD			NONE
PH, FIELD	SU		9.0
TEMPERATURE	DEG C		16
TURBIDITY, FIELD			NONE
WATER ELEVATION	FEET		608.24
ALKALINITY AS CACO3	MG/L		90
CHLORIDE	MG/L		21
COD	MG/L		
FLUORIDE	MG/L		3.4
HARDNESS AS CACO3	MG/L		390
NITROGEN, NITRATE + NITRITE	MG/L		0.59
SOLIDS, TOTAL DISSOLVED	MG/L		2600
SULFATE	MG/L		1800
ARSENIC, DISSOLVED	UG/L		51
BARIUM, DISSOLVED	UG/L		54
BORON, DISSOLVED	UG/L		3300
CADMIUM, DISSOLVED	UG/L <	:	0.30
CHROMIUM, DISSOLVED	UG/L		11
COPPER, DISSOLVED	UG/L <	:	20
IRON, DISSOLVED	UG/L <	:	100
LEAD, DISSOLVED	UG/L <	:	3.0
MANGANESE, DISSOLVED	UG/L <	:	5.0
MERCURY, DISSOLVED	UG/L <	:	0.20
SELENIUM, DISSOLVED	UG/L		57
SILVER, DISSOLVED	UG/L <	:	1.0
ZINC, DISSOLVED	UG/L <	:	20

Appendix C

2016 Low-Hazard Waste Exemption Leaching Test Results – Slag and Ash

Sediment and Soil Analytical Results - Water Leach Test Results WPL Nelson Dewey

Sample	Date	Depth (feet)	Material Type	Lab Notes	Boron (ug/L)	Chloride (mg/L)	Fluoride (mg/L)	Sulfate (mg/L)	TDS (mg/L)
WPDES POND	•	•			, 6,			, 0, ,	
SED-1	8/3/2016	0-1.3	Fly Ash		240	4.3	<1.0	4.4	54
SED-2	8/3/2016	0-1.0	Fly Ash		200	4.3	<1.0	11.5	60
QC-3 (SED-2)	8/3/2016	0-1	Fly Ash		240	3.5 J	<1.0	6.1	52
SED-3	7/20/2016	0-4.5	Slag		130	2.7 J	<1.0	5	28
	7/20/2016	4.5-5.5	SP		<50	2.5 J	<0.20	<2.0	14 J
SED-4	7/19/2016	0-4.8	ML		510	10.5 J	<10.0	11.9 J	86
	7/19/2016	4.8-5.5			74 J	NA	NA	NA	NA
GP-19	8/4/2016	8-12	SM		62 J	2.4 J	<1.0	2 J	16 J
SLAG POND		L				l.			L
SED-5	7/20/2016	0-1.6	ML-OL		54 J	3.2 J	<1.0	33.3	90
SED-6	7/20/2016	0-1.0	ML		60 J	3.7 J	0.36 J	59.1	130
SED-7	8/4/2016	0-3.0	Fly Ash		88 J	4	<1.0	10.5	76
SED-8	8/4/2016	1.0-1.5	Fly Ash		82 J	3.7 J	<1.0	12.1	74
COAL YARD									
TP-CY-1	7/19/2016	0-0.5	Coal		140	<20.0	<2.0	<20.0	32
	7/19/2016	3.0-3.5	SM		100 J	2.8 J	<1.0	<2.0	20
TP-CY-3	7/20/2016	1.9-2.1	GM		<50	3.9 J	<0.20	2.8 J	50
	7/20/2016	4.8-5.5	SM		NA	NA	NA	NA	NA
TP-CY-4	7/19/2016	0-2.8	Coal		190	<20.0	<2.0	<20.0	38
	7/19/2016	2.8-3.2	GP & SM		<50	<10.0	<1.0	<10.0	34
	7/19/2016	3.6-4.8	Slag		<50	<20.0	<2.0	<20.0	10 J
	7/19/2016	4.8-5.0			NA	NA	NA	NA	NA
TP-CY-6	7/19/2016	0-0.5	Coal		190	<20.0	<2.0	<20.0	54
	7/19/2016	0.7-1.0	SP		<50	2.5 J	<0.20	2.3 J	30
TP-CY-10	7/19/2016	0-0.5	Coal		120	2.4 J	<1.0	11.6	48
	7/19/2016	1.0-2.0	SM		<50	2.2 J	<1.0	2.3 J	28
TP-CY-12	7/20/2016	0-0.3	Coal		160	<20.0	<2.0	<20.0	44
	7/20/2016	0.3-2.0	SP		<50	2.2 J	<0.20	2.2 J	24
	7/20/2016	2.0-2.7	SP		<50	2.3 J	<0.20	27.5	50
QC-1 (TP-CY-12)	7/20/2016	0.3-2.0	SP		<50	2.6 J	<0.20	2.5 J	24
SLAG HANDLING AREA				<u> </u>					
GP-5	8/3/2016	12.5-15	Fly Ash		100	<2.0	<1.0	3.0 J	22
	8/3/2016	18-24	ML & SM		99 J	3.3 J	<1.0	<2.0	24
GP-7	8/3/2016	7.5-18	Slag		<50	2.2 J	<1.0	<2.0	<8.7
QC-2 (GP-7)	8/3/2016	7.5-18	Slag		<50	2.2 J	<1.0	<2.0	10 J
GP-14	8/4/2016	12.5-15	Fly Ash		120	<2.0	<1.0	13.4	96
SLAG SAMPLES ¹			•	· · · ·					
Slag 01 ²	6/3/2013		Slag		NA	NA	NA	NA	NA
Slag 01	12/23/2013		Slag		12.5 AB	0.277 B	NA	0.218	NA
NED Slag Composite 2014	7/1/2014		Slag		11.7 AB*^	< 0.142	NA	0.457 B	98 H
Slag Sample	4/14/2015		Slag		< 1020 A	0.751	NA	0.427	NA
	-								!

Sediment and Soil Analytical Results - Water Leach Test Results **WPL Nelson Dewey**

Sample	Date	Depth (feet)	Material Type	Lab Notes	Boron (ug/L)	Chloride (mg/L)	Fluoride (mg/L)	Sulfate (mg/L)	TDS (mg/L)
FLY ASH SAMPLES ¹									
NED Flyash Composite ²	2/14/2014		Fly Ash		NA	NA	NA	6,530 B	NA
Week of 062815 ²	7/3/2015		Fly Ash		NA	NA	NA	6,260	NA
Week of 010916	1/4/2016		Fly Ash		NA	NA	NA	NA	NA
NR 140 Preventative Action Limits (PA	LLs)				200	125	0.8	125	NE
NR 140 Enforcement Standards (ESs)					1000	250	4	250	NE
40 CFR Part 141.62 Maximum Conta	minant Levels (MCL)				NE	NE	4	NE	NE
NR 538 Table 1A Standards		190	125	0.8	125	NE			
NR 538 Table 2A Standards					1900	1,250	8	1,250	NE

NA = Not Analyzed

Abbreviations:

mg/L = micrograms per literML = SiltML-OL = Silty Organic Clay NE = No Standard Established ML-CL = Silty Clay

SM = Silty SandSP = Poorly Graded Sand ML-OL = Silty Organic Clay GM = Silty Gravel GP = Poorly Graded Gravel

TDS = Total Dissolved Solids

- 1. Slag and Fly Ash samples were collected by the plant as part of permit requirements.
- 2. Sample was analyzed using the SPLP Leach Method rather than the ASTM Water Leach Method for tested parameters except for Sulfate.
- NR 140 ESs Wisconsin Administrative Code (WAC), Chapter NR 140.10 Table 1 Public Health Groundwater Quality Standards from July 2015 and WAC, Chapter NR 140.12 Table 2 - Public Welfare Groundwater Quality Standards from July 2015.
- NR 140 PALs WAC, Chapter NR 140.10 Table 1 Public Health Groundwater Quality Standards from July 2015 and WAC, Chapter NR 140.12 Table 2 Public Welfare Groundwater Quality Standards from July 2015.

Laboratory Notes/Qualifiers:

- J = Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
- A = Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.
- ${\bf B}={\bf Compound}$ was found in the blank and sample.
- F1 = MS and/or MSD Recovery is outside acceptance limits.
- H = Sample was prepped or analyzed beyond the specified holding time.
- $^{\Lambda}$ = ICV, CCV, ICB, CCB, ISA, ISB, CRI, CRA, DLCK or MRL standard: Instrument related QC is outside acceptance limits.
- * = LCS or LCSD is outside acceptance limits.

Date: 3/1 4/2016 Created by: Last revision by: RJG Date: 10/24/2016 Checked by: BSS Date: 10/24/2016

Original table prepared for Slag Pond Closure Low Hazard Waste Exemption Request (SCS Project #25216054.00).

Reformatted for the Alternative Source Demonstration to include only the parameters with SSIs that were included in the leach testing by NDK, 9/14/2020; SCC 10/1/2021.

l:\25221071.00\Deliverables\2021 April ASD NED\Appendix C 2016 leachate results slag and ash\[Table 4. Sediment_Soil_Water Leach Results-Updated.xlsx]Leach Test - SSI Parameters

E2 Alternative Source Demonstration, April 2022 Detection Monitoring

Alternative Source Demonstration April 2022 Detection Monitoring

Slag Pond Nelson Dewey Generating Station Cassville, Wisconsin

Prepared for:



SCS ENGINEERS

25222071.00 | October 13, 2022

2830 Dairy Drive Madison, WI 53718-6751 608-224-2830

Table of Contents

Sect.	ion			Page
PE Ce	ertifica	ation		ii
1.0	Intro	duction.		1
	1.1	§257.9	94(e)(2) Alternative Source Demonstration Requirements	1
	1.2	Site In	formation and Map	1
	1.3	Statist	ically Significant Increases Identified	2
	1.4	Overvi	ew of Alternative Source Demonstration Approach	2
2.0	Back	ground.		3
	2.1	Geolog	gic and Hydrogeologic Setting	3
		2.1.1	Regional Information	3
		2.1.2	Site Information	3
	2.2	Coal C	ombustion Residuals Rule Monitoring System	4
	2.3	Other I	Monitoring Wells	4
3.0	Meth	odology	y and Analysis Review	4
	3.1	Sampl	ing and Field Analysis Review	2
	3.2	Labora	atory Analysis Review	4
	3.3		ical Evaluation Review	
	3.4		ary of Methodology and Analysis Review Findings	
4.0	Alter	native S	Sources	5
	4.1	Potent	tial Causes of Statistically Significant Increases	5
		4.1.1	Natural Variation	5
		4.1.2	Man-Made Alternative Sources	
	4.2	Lines o	of Evidence	6
		4.2.1	Previous CCR Pond and Landfill Study	6
		4.2.2	5 1 5	
		4.2.3	State Program Groundwater Monitoring Results	8
5.0			Source Demonstration Conclusions	
6.0			water Monitoring Recommendations	
7.0	Refe	rences		9
			Tallala	
			Tables	
Table Table Table Table	2. 3.	His Gro	oundwater Analytical Results Summary – April 2022 storical Analytical Results for Parameters with SSIs oundwater Elevation Summary – State and CCR Monitoring Wells alytical Results – State Monitoring Program	

Figures

Figure 1.	Site Location Map
Figure 2.	Aerial View

Figure 3. Site Plan and Monitoring Well Locations
Figure 4. Water Table Flow Map – April 2022

Appendices

Appendix A CCR Well Trend Plots

Appendix B 1994 RMT Environmental Contamination Assessment Information

Appendix C 2016 Low-Hazard Waste Exemption Leaching Test Results – Slag and Ash

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PE CERTIFICATION



I, Sherren Clark, hereby certify that that the information in this alternative source demonstration is accurate and meets the requirements of 40 CFR 257.94(e)(2). This certification is based on my review of the groundwater data and related site information available for the Nelson Dewey Generating Station Slag Pond facility. I am a duly licensed Professional Engineer under the laws of the State of Wisconsin.

Nelson Dewey Generating Station, Cassville

(Entire Document)



1.0 INTRODUCTION

This Alternative Source Demonstration (ASD) was prepared to support compliance with the groundwater monitoring requirements of the "Coal Combustion Residuals (CCR) Final Rule" published by the U.S. Environmental Protection Agency (U.S. EPA) in the *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule,* dated April 17, 2015 (U.S. EPA, 2015), and subsequent amendments. Specifically, this report was prepared to fulfill the requirements of 40 CFR 257.94(e)(2). The applicable sections of the Rule are provided below in *italics*.

1.1 §257.94(E)(2) ALTERNATIVE SOURCE DEMONSTRATION REQUIREMENTS

The owner and operator may demonstrate that a source other than the CCR Unit caused the statistically significant increase over background levels for a constituent or that the statistically significant increase resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. The owner or operator must complete the written demonstration within 90 days of detecting a statistically significant increase over background levels.

An ASD is completed when there are exceedances of one or more benchmarks established within the groundwater monitoring program to determine if any other sources are likely causes of the identified exceedance(s) of established benchmark(s) at the site. This ASD was performed in response to results indicating a statistically significant increase (SSI) over background levels during detection monitoring under the CCR Rule.

This ASD report evaluates the SSIs observed in the statistical evaluation of the April 2022 detection monitoring event at the Nelson Dewey Generating Station (NED). The first ASD prepared for this facility evaluated the SSIs observed in the statistical evaluation of the October 2017 detection monitoring event (SCS Engineers [SCS], 2018). The October 2017 ASD and subsequent semiannual updates have included several lines of evidence demonstrating that SSIs reported for Appendix III parameters in the downgradient monitoring wells were likely due to man-made sources other than the slag pond CCR Unit and/or naturally occurring constituents in the alluvial aquifer. The conclusions of this ASD are consistent with previous ASDs.

1.2 SITE INFORMATION AND MAP

The NED site is located along the east bank of the Mississippi River, north of the Village of Cassville, in Grant County, Wisconsin (**Figure 1**). The facility includes a decommissioned coal-fired generating plant, a CCR landfill that was closed in 2001, a closed Slag Pond, and a closed wastewater treatment pond. The layout of the site on an aerial photograph base is shown on **Figure 2**. The closed landfill at the NED facility was permitted under Wisconsin Department of Natural Resources (WDNR) License #02525.

The existing CCR Unit evaluated for this ASD is:

Slag Pond (existing surface impoundment – closed January 2018)

A map showing the CCR Unit and all background (or upgradient) and downgradient monitoring wells with identification numbers for the CCR groundwater monitoring program and the state monitoring program is provided as **Figure 3**.

Operations at the facility began in the late 1950s, and a CCR impoundment that included what is now the Slag Pond closure area was commissioned at that time. The CCR landfill was initially licensed in 1976 and received fly ash from NED until it was closed in phases between 1996 and 2001. The CCR landfill was initially operated as a fly ash sluice basin, then transitioned to dry ash placement prior to closure. The wastewater ponds, now closed, were constructed in 1976 for the purpose of settling CCR from the NED process wastewater streams and sediment from storm water runoff prior to discharge. Both NED generating units were retired on December 31, 2015, and have since been decommissioned. The generating station was demolished in 2017. Closure of the slag pond was completed in January 2018.

1.3 STATISTICALLY SIGNIFICANT INCREASES IDENTIFIED

The statistical evaluation was completed in accordance with 40 CFR 257.93(f)(3) using a prediction interval procedure, in which an interval for each constituent is established from the distribution of the background data, and the level of each constituent in each compliance well is compared to the upper prediction limit (UPL). The initial evaluation was based on an interwell comparison. The UPLs were calculated based on a 1-of-2 resampling approach. The UPLs and the analytical results for the April 2022 monitoring event are summarized in the attached **Table 1**.

The initial evaluation indicated that the April 2022 monitoring event results represent an SSI over background for the following parameters and wells:

Boron: B-7R, B-11A, B-11B, B-11R, B-31A, B-31R

Calcium: B-11RField pH: B-31A

• Sulfate: B-11B, B-11R, B-31R

• Total Dissolved Solids (TDS): B-11B, B-11R

The SSIs are consistent with SSIs identified in previous detection monitoring results.

1.4 OVERVIEW OF ALTERNATIVE SOURCE DEMONSTRATION APPROACH

This ASD report includes:

- Background information (Section 2.0).
- Evaluation of potential that SSIs are due to methodology or analysis (Section 3.0).
- Evaluation of potential that SSIs are due to natural sources or man-made sources other than the CCR Units (Section 4.0).
- ASD conclusions (Section 5.0).
- Monitoring recommendations (Section 6.0).

Historical monitoring results from background and compliance sampling for the CCR Rule constituents with SSIs are provided in **Table 2**. The laboratory report for the April 2022 event will be included in the 2022 Annual Groundwater Monitoring and Corrective Action report to be completed in January 2023. Complete laboratory reports for the background monitoring events and previous detection monitoring events were included in the previous annual groundwater monitoring and corrective action reports.

2.0 BACKGROUND

To provide context for the ASD evaluation, the following background information is provided in this section of the report, prior to the ASD evaluation sections:

- Geologic and hydrogeologic setting
- CCR Rule monitoring system
- Other monitoring wells

A more detailed discussion of the background information for the site is provided in the ASD for the October 2017 event (SCS, 2018).

2.1 GEOLOGIC AND HYDROGEOLOGIC SETTING

2.1.1 Regional Information

The uppermost geologic formation beneath the NED site is the surficial alluvial aquifer. The alluvial aquifer consists of Mississippi River valley sand and gravel deposits, and is the uppermost aquifer as defined in section 257.53 of the CCR Rule. This deposit is prevalent along the edges of the entire Mississippi River valley in southwestern Wisconsin.

The alluvial aquifer is underlain by dolomitic bedrock of the Prairie du Chien Group. The dolomite bedrock is also an aquifer and is likely hydraulically connected to the alluvial aquifer above.

Regionally, groundwater flow is generally to the southwest and discharges to the Mississippi River.

Additional details on the regional geology were provided in the October 2017 ASD (SCS, 2018).

2.1.2 Site Information

The thickness of the alluvium in the immediate vicinity of the site is over 125 feet, as evidenced by local water supply well logs (SCS, 2018). These logs are also evidence that the alluvial aquifer yields useable quantities of groundwater for supply wells in the area. Soil boring logs for monitoring wells installed at the site also generally indicate sand and gravel soils within the monitored depths.

The groundwater flow direction in the vicinity of the plant is generally southwest toward the Mississippi River. Historically, infiltration at the former Slag Pond, former fly ash basin, and the former Wisconsin Pollutant Discharge Elimination System (WPDES) ponds caused groundwater mounding to be present around these features; however, these ponds have now all been closed and are no longer sources of infiltration.

Site water level measurements generally indicate that groundwater flow is to the southwest, discharging to the Mississippi River. However, during periods of high river water levels, the flow temporarily reverses and the river discharges to the shallow sand and gravel aquifer. The groundwater flow direction during the April 2022 detection monitoring event was generally to the southwest toward the Mississippi River (**Figure 4**). The groundwater elevations are provided in **Table 3**.

2.2 COAL COMBUSTION RESIDUALS RULE MONITORING SYSTEM

The groundwater monitoring system established in accordance with the CCR Rule consists of one upgradient (background) monitoring well and six downgradient monitoring wells. The background well is B-26. The downgradient wells include B-7R, B-11A, B-11B, B-11R, B-31A, and B-31R. The CCR Rule wells are installed within the surficial alluvium aquifer. Well depths range from approximately 23 to 114 feet, measured from the top of the well casing.

2.3 OTHER MONITORING WELLS

There are several additional groundwater monitoring wells at the NED facility that are part of the monitoring system developed for the state monitoring program. All of the wells included in the CCR monitoring well network were already in use for the state monitoring program. The well locations are shown on **Figure 3**. The state program monitoring wells and two private wells are used to monitor groundwater conditions at the site under WDNR License Number 2525, which includes the closed CCR landfill and the closed Slag Pond. Monitoring wells for the state monitoring program are installed in the surficial sand and gravel aquifer, which is the uppermost aquifer as defined under 40 CFR 257.53.

3.0 METHODOLOGY AND ANALYSIS REVIEW

To evaluate the potential that an SSI is due to a source other than the regulated CCR Unit, SCS used a two-step evaluation process. First, the sample collection, field and laboratory analysis, and statistical evaluation were reviewed to identify any potential error or analysis that led to an exceedance of the benchmark. Second, potential alternative sources, including natural variation and man-made sources other than the CCR Unit, were evaluated. This section of the report provides the findings of the methodology and analysis review. **Section 4.0** of the report addresses the potential alternative sources.

3.1 SAMPLING AND FIELD ANALYSIS REVIEW

Field notes and sampling results were reviewed to determine if any sampling error may have caused or contributed to the observed SSIs. Potential field sampling errors or issues could include mislabeling of samples, improper sample handling, missed holding times, cross contamination during sampling, or other field error. Field blank sample results were also reviewed for any indication of potential contamination from sampling equipment or containers. Based on the review of the field notes and results, SCS did not identify any indication that the SSIs were due to a sampling error.

SCS did not identify any issues with the field sampling for field analysis based on review of the data and field notes. Because boron, calcium, TDS, and sulfate are laboratory parameters, there is little potential for a field analysis error to contribute to an SSI.

3.2 LABORATORY ANALYSIS REVIEW

The laboratory reports for the April 2022 detection monitoring events were reviewed to evaluate whether any laboratory analysis error or issue may have caused or contributed to the observed SSIs. The laboratory report review included reviewing the laboratory quality control flags and narrative, verifying that correct methods were used and desired detection limits were achieved, and checking the field and laboratory blank sample results. Laboratory reports for the background monitoring events were reviewed for the October 2017 ASD. Laboratory reports for subsequent detection monitoring events were reviewed as part of the ASD preparation for each event.

Based on the review of the laboratory reports, SCS did not identify any indication that any SSI was due to a laboratory analysis error. There were no laboratory quality control flags or issues identified in the laboratory reports that affect the usability of the data for detection monitoring. Because field pH is a field parameter, there is little potential for a laboratory error to contribute to an SSI.

Time series plots of the SSI constituent analytical data were also reviewed for any anomalous results that might indicate a possible sampling or laboratory error (e.g., dilution error or incorrect sample labeling). The time series plots are provided in **Appendix A**. None of the time series plots included anomalous results that appeared to indicate a sampling or laboratory error.

3.3 STATISTICAL EVALUATION REVIEW

The review of the statistical results and methods included a quality control check of the following:

- Input analytical data vs. laboratory analytical reports
- Statistical method and process for each SSI

Based on the review of the statistical evaluation, SCS did not identify any errors or issues in the statistical evaluation that caused or contributed to the determination of interwell SSIs for boron, calcium, field pH, sulfate, and TDS at the downgradient monitoring wells.

3.4 SUMMARY OF METHODOLOGY AND ANALYSIS REVIEW FINDINGS

In summary, there were no changes to the SSI determinations for the April 2022 detection monitoring events based on the methodology and analysis review. No errors or issues causing or contributing to the reported SSIs were identified.

4.0 ALTERNATIVE SOURCES

This section of the report discusses the potential alternative sources for the SSI constituents at the downgradient wells, identifies the most likely alternative source(s), and presents the lines of evidence indicating that an alternative source is the most likely cause of the observed SSIs.

4.1 POTENTIAL CAUSES OF STATISTICALLY SIGNIFICANT INCREASES

4.1.1 Natural Variation

The statistical analysis was completed using an interwell approach, comparing the April 2022 detection monitoring results to the UPLs calculated based on sampling of the background well (B-26). If concentrations of a constituent that is naturally present in the aquifer vary spatially, then the potential exists that the downgradient concentrations may be higher than upgradient concentrations due to natural variation.

Although natural variation is present in the shallow aquifer, it does not appear likely that natural variation is the primary source causing the boron, field pH, sulfate, and TDS SSIs. These parameters were detected at higher concentrations than would likely be present naturally.

Natural variation may have caused or contributed to the SSI for calcium at B-11R. As discussed in **Section 2.1.1**, the alluvial aquifer is underlain by dolomitic bedrock of the Prairie du Chien Group. The dolomite aquifer is also present in the bluffs northeast of the site and groundwater from the

dolomite likely discharges to the alluvial aquifer. Calcium is a typical constituent of groundwater in dolomite aquifers. The calcium concentrations in upgradient well B-26 have exceeded those in at least three of the downgradient wells, suggesting that natural variability may contribute to the calcium concentrations observed in the downgradient monitoring wells.

4.1.2 Man-Made Alternative Sources

Man-made alternative sources that could potentially contribute to the boron, calcium, field pH, sulfate, and TDS SSIs could include the closed CCR landfill, the coal storage area, or other plant operations. Based on the groundwater flow directions and on previous investigations at the site, the closed landfill appears to be the most likely man-made cause of the SSIs for the downgradient wells B-7R, B-11A, B-11B, B-31A, and B-31R.

4.2 LINES OF EVIDENCE

The lines of evidence indicating that the SSIs for boron, calcium, field pH, sulfate, and TDS in one or more compliance wells relative to the background well are more likely due to the closed landfill and prior fly ash sluicing than to the Slag Pond include:

- 1. A previous Environmental Contamination Assessment completed for the ash disposal facility indicated that the fly ash sluicing and landfill were the primary source of the groundwater impacts in the area, based on multiple lines of evidence.
- 2. Sampling performed in preparation for the Slag Pond closure indicated that the slag and the Slag Pond sediment had little potential to cause the SSIs for boron, sulfate, and TDS.
- 3. Past and current groundwater monitoring performed under the state monitoring program shows that groundwater quality has improved since the 1990s in response to termination of fly ash sluicing and closure and capping of the ash landfill. Recent concentration increases at some wells in the state monitoring program appear to be attributable to the closed CCR landfill source and to changes in groundwater flow at the site in response to closure of the Slag Pond.

The data supporting these lines of evidence are discussed below. Most of these lines of evidence and the supporting data were discussed in detail in the ASD for the October 2017 detection monitoring event (SCS, 2018), with the exception of the TDS SSI concentrations. For lines of evidence included in previous ASDs, the discussion focuses on any updated information collected since the previous ASD, with references to the previous ASD for additional details.

4.2.1 Previous CCR Pond and Landfill Study

A previous investigation titled *Environmental Contamination Assessment: Nelson Dewey Generating Station Ash Disposal Facility*, completed by RMT in 1994, found that groundwater impacts were associated with disposal of fly ash in the now-closed CCR landfill located immediately north of the Slag Pond (**Figure 3**). The purpose of the 1994 Environmental Contamination Assessment (ECA) was to investigate the impacts to groundwater at the NED landfill. The ECA was used to evaluate the feasibility of possible remedial alternatives. The remedial alternative that was ultimately selected was to convert the plant to dry fly ash handling.

The primary lines of evidence from the 1994 report that support the current ASD for boron, field pH, sulfate, and TDS include:

- Water leaching tests for ash and slag indicated that boron and sulfate concentrations in the slag leachate were orders of magnitude lower than in the fly ash leachate (Appendix B, Table 5). Higher pH values were also reported for leach samples of Western coal fly ash in 1990 to 1992 than for the slag samples.
- Surface water samples from the then active fly ash sluice pond and the Slag Pond indicated that boron and sulfate concentrations in the Slag Pond were one or more orders of magnitude lower than in the ash sluice pond. The surface water pH measurement was also higher in the ash sluice pond. The surface water boron and sulfate concentrations in the Slag Pond were higher than leach test results, which was attributed to infiltration of ash sluice pond water through the berm between the ponds into the Slag Pond (Appendix B, Table 6).
- Groundwater sampling at monitoring wells B-38 and B-38A (now abandoned), which were
 installed through and screened below the ash disposal area (now closed landfill),
 indicated that groundwater affected by ash sluicing was characterized by high pH and
 elevated concentrations of boron, sulfate, and TDS (Appendix B, Site Map and Table 8).

Although calcium was not included in the historical state groundwater monitoring program or evaluated in the 1994 report, hardness was monitored and provides an indication of relative calcium concentrations. Surface water samples from the then active ash sluice pond and the Slag Pond indicated that hardness in the Slag Pond was lower than in the ash sluice pond (**Appendix B**, **Table 6**). These results suggest that if the calcium SSI is not solely due to natural variation, then the closed CCR landfill is the most likely man-made source of calcium.

The results of the 1994 ECA were reported to WDNR on November 1994. The ECA investigation was then used for a feasibility study to determine appropriate ash disposal operation on site. Following the ECA, the plant converted to a dry ash handling system. Dry ash was placed in the CCR landfill through the 1990s, and the landfill was capped and closed in phases in 1996 through 2001. After that time, fly ash was not disposed of at the facility.

4.2.2 Slag Pond Closure Sampling Results

Results of leaching test analysis performed for slag, ash, soil, and sediment were submitted as part of a Low Hazard Exemption Request to the WDNR in March 2017 (SCS, 2017). The Exemption Request was submitted as part of the Closure Plan for the site and requested WDNR approval to consolidate materials from decommissioning activities in the Slag Pond and Slag Handling Area, which would then be capped with a composite final cover system. The sediment and soil samples were collected to characterize the materials that would remain on site under the Closure Plan. Leaching tests were performed using ASTM water leach test methods. The leaching test analytical results for parameters with SSIs that were included in the leaching test program (boron, sulfate, and TDS) are summarized in **Appendix C**.

The sampling results in the Exemption Request indicated that the materials to be consolidated and capped were not likely to cause groundwater standard exceedances for boron, sulfate, or TDS. The leach test results for slag, Slag Pond sediment, and soil in the Slag Handling Area were below the state groundwater standards for boron and sulfate. The parameter TDS does not currently have a state standard but the leach test results for slag, Slag Pond sediment, and soil in the Slag Handling Area were all below the calculated TDS UPL for the site (**Table 1** and **Appendix C**). The boron, sulfate, and TDS results were also below the concentrations in the downgradient CCR wells with SSIs, and

well below the historical results for former well B-38, which was located within the CCR landfill area, upgradient from the Slag Pond (**Appendix B**, **Table 8**).

The Low Hazard Exemption was granted by the WDNR based on the sampling results and other information presented.

4.2.3 State Program Groundwater Monitoring Results

Past and current groundwater monitoring performed under the state monitoring program shows that groundwater quality has improved substantially since the 1990s in response to termination of fly ash sluicing, and closure and capping of the ash landfill (SCS, 2018). The long-term trends show that concentrations of boron and sulfate in groundwater have decreased or stabilized since termination of fly ash sluicing and closure of the landfill, in some cases by an order of magnitude or more. The results suggest that current pH levels and boron, sulfate, and TDS concentrations likely represent residual contamination from historical ash disposal in the CCR landfill area. Increases in boron, sulfate, and TDS concentrations at B-11B beginning in 2018 appear to be attributable to the closed CCR landfill and to changes in groundwater flow at the site, related to a decrease in the volume of water discharged to the Slag Pond and subsequent closure of the Slag Pond. Concentrations of boron in samples from B-11B transitioned to a decreasing trend as of October 2019. A summary of state analytical groundwater results is provided in **Table 4**.

5.0 ALTERNATIVE SOURCE DEMONSTRATION CONCLUSIONS

The lines of evidence discussed above regarding the SSIs reported for boron, calcium, field pH, sulfate, and TDS results in downgradient monitoring wells demonstrate that the SSIs are likely primarily due to sources other than the closed Slag Pond. The SSIs for boron, calcium, field pH, sulfate, and TDS appear to be due to historical ash disposal in the closed CCR landfill, which is not subject to the requirements of 40 CFR 257.50-107. The landfill is regulated by the WDNR under the solid waste program (License 02525). Natural variation in groundwater quality in the aquifer may also contribute to the SSI for calcium.

6.0 SITE GROUNDWATER MONITORING RECOMMENDATIONS

In accordance with section 257.94(e)(2) of the CCR Rule, the NED Slag Pond site may continue with detection monitoring based on this ASD. The ASD report will be included in the 2022 Annual Report due January 31, 2023.

7.0 REFERENCES

RMT, 1994, Environmental Contamination Assessment: Nelson Dewey Generating Station Ash Disposal Facility, November 1994.

SCS Engineers, 2017, Low Hazard Exemption Request, Nelson Dewey Generating Station, Cassville, WI, March 2017.

SCS Engineers, 2018, 2017 Alternative Source Demonstration, October 2017 Monitoring Event, Nelson Dewey Generating Station, April 2018.

U.S. Environmental Protection Agency (U.S. EPA), 2015, Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, April 2015.

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Tables

- 1 Groundwater Analytical Results Summary April 2022
- 2 Historical Analytical Results for Parameters with SSIs
- 3 Groundwater Elevation Summary State and CCR Monitoring Wells
- 4 Analytical Results State Monitoring Program

Table 1. Groundwater Analytical Results Summary Nelson Dewey Slag Pond, Cassville, WI / SCS Engineers Project #25222071.00

		Background Well			Complic	ınce Wells			
		B-26	B-7R	B-11A	B-11B	B-11R	B-31A	B-31R	
Parameter Name	UPL	4/25/2022	4/26/2022	4/26/2022	4/26/2022	4/26/2022	4/26/2022	4/25/2022	
Appendix III									
Boron, ug/L	72.3	52.5	98.1	88.6	2,590	2,330	198	454	
Calcium, ug/L	108,000	75,900	59,200	51,600	97,100	114,000	55,300	81,100	
Chloride, mg/L	77.6	45.3	12.0	58.3	36.5	18.0	56.0	36.0	
Fluoride, mg/L	0.2	<0.48 D3,	I < () 4X 1) 3	<0.095	<0.48	<0.48 D3	0.22 J	<0.095	
Field pH, Std. Units	7.71	7.19	6.43	7.53	7.63	7.01	7.82	6.77	
Sulfate, mg/L	44.0	34.2	3.7 J,	8.5	513	58.1	15.4	60.0	
Total Dissolved Solids, mg/L	553	470	318	350	1,000	560	316	428	

7.81 Blue shaded cell indicates the compliance well result exceeds the UPL (background) and the Limit of Quantitation (LOQ).

Abbreviations:

UPL = Upper Prediction Limit

Ug/L = micrograms per liter

LOQ = Limit of Quantitation

mg/L = milligrams per liter

Lab Notes:

J = Estimated concentration at or above the LOD and below the LOQ.

D3 = Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

M0 = Matrix Spike recovery and/or matric spike duplicate recovery was outside laboratory control limits.

Notes:

- 1. An individual result above the UPL may not constitute an SSI above background. See the accompanying letter text for identification of statistically significant results.
- 2. Interwell UPLs calculated based on results from background well B-26. UPLs are based on a 1-of-2 retesting approach.
- 3. Interwell UPLs updated January 2021 based on background well results from December 2015 through October 2020.

 Created by:
 NDK
 Date:
 5/17/2022

 Last revision by:
 RM
 Date:
 5/23/2022

 Checked by:
 JAO
 Date:
 6/10/2022

 Proj Mgr QA/QC/Scientist:
 TK
 Date:
 6/27/2022

I:\25222071.00\Deliverables\2022 NED April CCR Results Letter\Table\[Table 1_2204-NED - CCR GW Screening Summary.xlsx]Current Event - Updated UPL

Table 2. Historical Analytical Results for Parameters with SSIs Nelson Dewey Generating Station - Cassville, Wisconsin / SCS Engineers Project #25222071.00

Well Group	Well	Collection Date	Boron (µg/L)	Calcium (mg/L)	Field pH (Std. Units)	Sulfate (mg/L)	Total Dissolved Solids (mg/L)
		12/9/2015	29.6	81,300	7.35	37.1	424
		4/12/2016	33.7	86,200	7.43	38.0	456
		7/19/2016	28.6	82,400	7.14	36.2	504
		10/20/2016	33.0	82,700	7.19	35.0	466
		1/12/2017	35.2	89,400	7.57	35.0	446
		4/17/2017	50.1	89,000	7.54	32.4	468
		6/7/2017	45.8	105,000	7.22	31.0	538
Background		8/2/2017	54.6	98,100	7.21	28.5	496
Λο.		10/19/2017	47.4	102,000	7.50	25.3	542
√g.	B-26	4/2/2018	48.0	88,100	7.64	19.1	464
gC		10/8/2018	53.4	78,700	7.20	25.1	450
Ğ		4/22/2019	41.6	75,300	7.10	26.7	458
		10/15/2019	<3.00 U	<76.2	7.24	36.0	404
		4/14/2020	66.1	88,500	7.27	30.2	464
		10/13/2020	63.6	76,500	7.34	37.0	448
		4/21/2021	63.6	78,700	7.27	35.3	470
		10/8/2021	48.4	84,900	7.18	43.8	440
		4/25/2022	52.5	75,900	7.19	34.2	470
		12/9/2015	124	58,800	7.70	3.20 J	338
		4/13/2016	116	60,100	7.75	3.80 J	362
		7/19/2016	104	54,000	7.42	2.70 J	336
		10/19/2016	112	54,600	7.47	3.00 J	340
		1/12/2017	106	54,500	7.89	2.30 J	322
		4/17/2017	100	54,800	7.38	<1.00	326
		6/8/2017	102	57,800	7.78	1.40 J	338
		8/1/2017	105	54,500	7.67	2.40 J	326
	B-11A	10/19/2017	116	55,000	7.96	5.10	322
	D-117	4/2/2018	91.0	53,300	8.04	12.3 M0	336
		10/9/2018	94.2	48,600	7.43	6.00	332
		4/22/2019	93.9	60,400	7.62	1.90 J	386
		10/14/2019	80.7	56,600	7.66	<1.00	348
		4/13/2020	86.3	57,500	7.75	1.40 J	394
		10/12/2020	99.3	55,600	7.74	1.00 J	364
		4/19/2021	88.1	50,600	7.65	2.9	366
Ф		10/8/2021	85.4	51,400	7.57	7.0	356
Compliance		4/26/2022	88.6	51,600	7.53	8.5	350
olic		12/9/2015	1,140	64,100	8.06	134	494
Ę		4/13/2016	1,360	65,400	8.14	148	512
Ö		7/19/2016	1,210	59,000	7.77	165	520
		10/20/2016	1,460	59,100	7.91	178	496
		1/12/2017	1,540	63,900	8.18	182	488
		4/17/2017	1,760	67,400	7.83	181	502
		6/8/2017	1,880	68,200	8.07	191	516
		8/1/2017	1,800	61,400	7.77	179	498
		10/19/2017	1,500	52,400	7.77	175	510
	B-11B	4/2/2018	2,020	59,000	8.42	200	550
	סוו-ט	10/9/2018	3,620	66,300	7.74	197	602
		11/12/2018			8.05		594
		4/22/2019	6,830	83,300	7.91	303	742
		10/14/2019	4,630	91,400	7.92	339	728
		4/13/2020	5,380	115,000	7.89	378	872
		10/12/2020	3,350	91,200	7.80	388	906
		4/19/2021	4,440	93,400	8.07	379 M0	910
		10/8/2021	2,480	100,000	7.81	466	884
		4/26/2022	2,480	97,100	7.63	513	1000
		4/20/2022	2,370	77,100	7.00	313	1000

Table 2. Historical Analytical Results for Parameters with SSIs Nelson Dewey Generating Station - Cassville, Wisconsin / SCS Engineers Project #25222071.00

Well Group	Well	Collection Date	Boron (µg/L)	Calcium (mg/L)	Field pH (Std. Units)	Sulfate (mg/L)	Total Dissolved Solids (mg/L)
		12/9/2015	4,170	126,000	7.07	75.4	616
		4/13/2016	3,410	141,000	6.78	18.4	682
		7/19/2016	3,530	130,000	6.69	115	698
		10/20/2016	4,120	128,000	6.77	118	660
		1/12/2017	3,530	126,000	6.98	108	616
		4/17/2017	3,520	123,000	7.11	108	620
		6/7/2017	3,420	128,000	6.80	98.2	630
		8/1/2017	2,040	139,000	6.70	126 97.7	738
	B-11R	10/19/2017	3,120 3,180	117,000	7.22 7.14	97.7 88.1	586 638
	D III	4/2/2018 10/9/2018	576	124,000 49,900	6.55	15.1	266
		4/22/2019	1,360	82,400	6.82	34.6	406
		10/14/2019	1,440	66,000	6.83	40.7	310
		4/13/2020	2,140	117,000	6.80	40.7	570
		10/12/2020	2,870	120,000	6.83	22.8	600
		4/19/2021	3,010	115,000	7.11	61.2	578
		10/8/2021	2,940	119,000	6.86	61.8	576
		4/26/2022	2,330	114,000	7.01	58.1	560
		4/20/2022		114,000			
		12/9/2015	59.0	48,400	7.65	26.2	274
		4/13/2016	79.2	51,900	7.63	22.6	302
		7/19/2016	67.2	48,900	7.25	24.2	280
		10/20/2016	63.7	45,800	7.54	27.2	292
		1/12/2017	76.4	46,600	7.82	29.8	284
		4/17/2017	69.9	46,900	7.83	31.0	318
		6/8/2017	58.5	49,400	7.74	31.2	296
Ф		8/1/2017	56.3	46,000	7.56	26.6	284
JUK	B-31A	10/19/2017	63.9	49,600	7.92	26.1	290
Compliance	D-STA	4/2/2018	74.8	49,300	8.00	27.4	282
шc		10/9/2018	71.8	46,600	7.48	24.8	278
Ö		4/22/2019	86.2	48,200	7.61	21.6	284
		10/14/2019	98.5	52,200	7.69	22.3	272
		4/13/2020	132	50,900	7.71	16.6	298
		10/13/2020	127	47,700	7.78	16.8	300
		4/19/2021	172	52,100	7.90	15.8	330
		10/8/2021	178	53,500	7.44	14.9	294
		4/26/2022	198	55,300	7.82	15.4	316
		12/9/2015	851	77,400	6.79	28.8	374
		4/13/2016	838	84,900	6.76	34.1	404
		7/19/2016	641	76,100	6.44	38.5	406
		10/20/2016	1,020	84,200	6.53	49.7	452
		1/12/2017	749	73,900	6.80	34.9	380
		4/17/2017	929	85,600	6.80	43.0	416
		6/8/2017	895	90,700	6.67	41.1	426
		8/1/2017	1,550	93,400	6.56	55.6	432
		10/19/2017	645	75,700	7.19	19.2	358
	B-31R	4/2/2018	540	72,900	6.76	22.0	374
		10/9/2018	1,430	125,000	6.41	186	668
		11/12/2018			6.59	162	596
		4/22/2019	906	105,000	6.62	121	516
		10/14/2019	915	110,000	6.72	146	480
		4/13/2020	730	93,800	6.79	89.4	464
		10/12/2020	702	95,700	6.89	49.4	462
		4/19/2021	621	91,400	6.91	45.3	454
		10/8/2021	353	79,000	6.63	24.9	372
		4/25/2022	454	81,100	6.77	60.0	428

Table 2. Historical Analytical Results for Parameters with SSIs Nelson Dewey Generating Station - Cassville, Wisconsin / SCS Engineers Project #25222071.00

Well Group	Well	Collection Date	Boron (µg/L)	Calcium (mg/L)	Field pH (Std. Units)	Sulfate (mg/L)	Total Dissolved Solids (mg/L)
		12/9/2015	110	31,700	6.74	17.0 J	198
		4/13/2016	115	42,300	6.80	2.50 J	218
		7/18/2016	164	44,400	6.29	2.40 J	220
		10/19/2016	154	56,600	6.55	<5.00	288
		1/12/2017	159	56,700	7.43	<5.00	240
		4/17/2017	129	61,400	6.60	<5.00	278
		6/7/2017	110	51,600	6.65	<5.00	240
O		8/1/2017	129	50,400	6.28	3.70	220
Compliance		10/19/2017	159	56,200	6.88	<5.00 , D3	242
ild	B-7R	4/2/2018	121	49,200	6.57	<5.00 , D3	220
ου		10/9/2018	73.0	38,500	6.23	3.20	186
Ö		4/22/2019	93.5	59,400	6.63	<5.00 , D3	254
		10/14/2019	139	57,700	6.62	<5.00 , D3	208
		4/13/2020	96.0	58,700	6.60	7.50 J, D3	306
		10/13/2020	145	41,900	6.35	<2.20	208
		4/20/2021	104	56,100	6.54	<2.2 D3	248
		10/8/2021 ⁽¹⁾			-		
		4/26/2022	98.1	59200	6.43	3.7 J, D3	318

Abbreviations:

μg/L = micrograms per liter or parts per billion (ppb)

mg/L = milligrams per liter or parts per million (ppm)

Std. Units = Standard Units

Flags:

J = Estimated concentration at or above the LOD and below the LOQ.

D3 = Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

M0 = Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.

-- = Not applicable.

Notes:

(1) B-7R could not be sampled on 10/8/2021 or during an attempted resampling event on 10/28/2021 due to low water levels.

Created by:	NDK	Date:	3/8/2018
Last revision by:	RM	Date:	7/27/2022
Checked by:	JJK	Date:	8/3/2022

Table 3. Groundwater Elevation Summary Nelson Dewey Closed Ash Disposal Facility / SCS Engineers Project #25222071.00

										(Ground Wa	er Elevatio	on in feet al	bove meai	n sea level	(amsl)											
Well Number	B-7R	B-8R	B-11R	B-11A	B-11B	B-21R	B-26	B-26A	B-28	B-30R	B-30AR	B-31R	B-31A	B-32	B-32A	B-35	B-35A	B-36	B-36A	B-37	B-37A	B-39	MW-301	MW-302	MW-303	Barge Gauge (\$G-12)	Pond Gauge (SG-13)
Top of Casing Elevation (feet amsl)	623.35	627.51	622.62	622.12	621.89	623.31	626.40	626.40	616.81	621.81	622.4	622.42	622.69	614.18	614.4	620.78	621.09	621.11	621.33	614.85	614.85	626.48	619.09	619.21	618.49	616.60	See notes
Screen Length (ft)	10	10	10	5	5	10	10	5	10	10	5	10	5	10	5	10	5	9	4.5	10	5	10	10	10	10		
Total Depth (ft from top of casing)	23.05	27.25	24.15	52.00	113.90	22.78	31.67	45.78	16.70	22.20	46.90	22.82	35.52	14.79	52.00	16.60	47.00			19.95	48.20	26.90	21.11	21.27	20.15		
Top of Well Screen Elevation (ft)	610.30	610.26	608.47	575.12	512.99	610.53	604.73	585.62	610.11	609.61	580.50	609.60	592.17	609.39	567.40	614.18	579.20	609.60	575.50	604.90	571.65	609.58	607.98	607.94	608.34		
Measurement Date																											
October 5-6, 2011	604.94	606.29	604.57	604.36	604.32	604.43	604.52	604.55	604.61	604.37	605.21	608.37	604.42	604.88	604.82	604.87	604.81			604.37	604.39						
April 25-26, 2012	606.58	606.30	606.07	606.30	606.28		605.89	605.91	-			608.65	606.31	604.33		606.29	#REF!			606.16	606.17	606.17		-			
October 17, 2012	604.39	604.16	604.10	603.98	603.98	604.08	604.12	604.14	604.31	603.97	603.98	607.32	604.07	604.33	604.35		#REF!			603.93	603.93	603.93					
April 2, 2013	607.04	608.01	606.15	607.20	607.17	606.30	605.60	605.64	605.90	605.91	605.93	607.13	607.13	606.11	606.14	606.13	606.25			606.99	607.02			-			
October 16-17, 2013	604.51	605.89	604.17	603.90	603.87	604.11	604.31	604.32	604.36	604.08	604.06	604.87	604.00	604.53	604.56	604.46	604.44			604.05	604.04			-			
April 10, 2014	607.42	608.97	607.45	607.28	607.26		607.22	607.23	-			607.37	607.28			607.46	607.39			607.25	607.26			-			
October 14-15, 2014	605.67	606.82	605.17	604.90	604.91	614.92	605.00	605.01	605.13	604.92	604.92	606.36	605.54	605.41	605.45	605.36	605.33			604.94	604.99						
April 16, 2015	607.26	608.50	607.11	607.15	607.05		606.40	606.41				607.37	607.09			606.73	606.78			606.99	606.88						
October 1-2, 2015	605.14	604.66	604.53	604.42	604.38	604.36	604.43	604.50	604.54	604.34	604.32	605.13	604.38	604.76	604.82	604.76	604.75			604.30	604.39						
December 8, 2015	606.69		606.71	606.30	606.26		606.80					607.40	606.39									607.54					
April 12, 2016	609.32	609.36	609.32	608.71	608.68		609.81	609.72				609.34	609.01			609.73	609.65			608.79	608.79	610.23					
July 18-19, 2016	606.54		606.14	606.76	606.74		606.09					606.55	606.73									606.28					
October 19-20, 2016	608.59	608.46	608.35	608.21	608.19	608.37	608.84	608.76	608.63	608.45	608.46	608.51	608.20	608.69	608.73	608.78	608.74			608.20	608.18	609.09					
January 11-12, 2017	608.02		607.96	607.83	607.78		608.56					607.90	607.84									608.92					
April 17, 2017	609.08	608.82	608.34	609.05	608.99	NM	608.59	608.54	609.94	608.57	608.64	607.20	608.98	608.96	608.98	609.00	609.02			609.02	609.02	610.23					
June 8, 2017	610.74		610.42	609.81	610.08		611.25					609.63	610.50									611.53					
August 1-2, 2017	607.02		606.73	605.57	605.50		607.39					606.84	605.69									608.71					
October 9-10, 2017	606.93	606.51	606.25	607.01	606.94		606.22	606.13	606.33	606.44	606.45	606.68	606.93	606.57	606.61	606.65	606.71										
October 19, 2017	609.60		609.42	609.58	609.65		608.84		-			609.47	609.43							609.40	609.40	608.55					
November 17, 2017						606.35										-	-				-						
December 19, 2017						604.81										-	-		-								
February 7, 2018	605.37		605.33	604.96	604.92				616.81			605.31	605.01									606.19	605.08	605.05	605.00		
March 16, 2018																							604.64	604.6	604.56		
April 203, 2018 **	604.82	606.61	606.27	606.63	606.55	606.52	606.49	606.37	606.39	606.46	606.43	604.44	606.46	606.58	606.66	606.68	606.70			606.77	606.83	606.19					
May 23, 2018																							610.68	610.78	610.61		
October 8-10, 2018	610.76	610.68	610.67	610.28	610.24	610.02	610.34	610.28	610.83	610.09	610.05	610.39	610.27	611.05	610.94	610.72	610.54					611.44					
November 11, 2018					609.14							609.11														608.40	
April 22-23, 2019	615.28	615.66	615.28	615.29	615.28	614.98	615.49	615.31	615.40	615.36	615.35	615.01	615.33			615.87	615.98					615.40				615.17	<615.06
October 14-16, 2019	613.43	613.11	613.06	613.29	613.18	612.47	613.10	613.10	612.71	612.83	612.78	612.50	613.20	613.10	613.00	613.10	613.15					613.35				612.33	<615.06
April 13-14, 2020	614.12	613.76	614.39	613.88	613.86	613.22	613.76	613.73	613.68	613.60	613.56	613.80	613.79			614.04	614.00					613.71				612.89	613.10
October 12-13, 2020	605.09	604.88	604.57	604.54	604.44	604.28	604.92	604.83	604.86	604.72	604.72	604.66	604.54	605.07	605.06	605.00	605.08					605.06				603.89	DRY
April 19-21, 2021	608.83	608.66	608.57	608.72	608.67	607.93	608.55	608.49	608.27	608.38	608.35	608.66	608.63	608.68	608.74	608.86	608.85	608.40	608.39	608.74	608.75	608.48				608.15	<609.00
October 6-8, 2021	604.05	604.04	603.85	603.79	603.74	603.56	604.21	604.13	604.11	604.00	603.97	603.98	603.84	604.32	604.38	604.35	604.34	603.93	603.92	NM	NM	604.23				602.90	<609.00
April 25-26, 2022	609.84	610.25	609.75	610.00	609.98	609.70	610.12	610.08	609.99	610.11	610.09	610.27	609.95	610.26	610.40	610.44	610.32	609.94	609.90	AB	AB	610.22				NM	609.25
, .p 25 25, 2522		3.0.23	557115	0.0.00	337.73	007110	0.02	0.0.00	007.17	0.0	0.0.07	3.0.2/	007.70	0.0.20	0.00	0.0	0.002	307.17	007.170	1.5	,	3.0.22					1 007.20
Bottom of Well Elevation (ft)	600.30	600.26	598.47	570.12	507.99	600.53	594.73	580.62	600.11	599.61	575.50	599.60	587.17	599.39	562.40	604.18	574.20	600.6	571	594.90	566.65	599.58	597.98	597.94	598.34		

Notes:

Created by: MDB Date: 4/1/2013 Last revision by: Date: 5/3/2022 Checked by: Date: 5/6/2022

I:\25222071.00\Deliverables\2022 April ASD NED\Tables\[Table 3 - Groundwater Elevation Summary.xls]levels

^{-- =} not measured

*The PVC casing at B-35A was cut down on June 28, 2018 to allow the protective cover to close. Groundwater elevations prior to 6/28/18 are calculated using the old top of casing (TOC) elevation of 621.20 ft amsl. Groundwater elevations after 6/28/18 are calculated using the new TOC elevation of 621.09 ft amsl).

**The PVC casing at B-21R was extended in 2018 following well rehabilitation. The well was resurveyed on April 22, 2019. The old top of casing elevation is 623.31 ft.

**The PVC casing at B-21R was extended in 2018 following well rehabilitation. The well was resurveyed on April 22, 2019. The old top of casing elevation is 623.31 ft.

[^] One pond staff gauge was installed on April 22, 2019. The base of the gauge (0 reading) is at 615.056 ft amsl. Two additional gauges were installed on March 24, 2020. These gauge bases are at 609' and 612' amsl.

Table 4. Analytical Results - State Monitoring Program
Nelson Dewey Generating Station
Cassville, Wisconsin / SCS Engineers Project #25222071.00

B-7R B-8R	2016-Apr 2016-Oct 2017-Apr 2017-Oct 2018-Apr 2018-Oct 2019-Apr 2020-Apr 2020-Oct 2021-Apr 2021-Oct 2022-Apr 2021-Oct 2022-Apr 2016-Apr	110 147 127 159 115 89.8 95.7 140 90.8 145	<0.20 <2.00 <0.50 <0.50 <0.50 D3 <0.10 <0.50 D3 <0.10 <0.50 D3, M0 <0.48 D3	7.40 <20.0 <5.00 <5.00 D3 3.40 <5.00 D3 <5.00 D3	6.80 6.55 6.60 6.61 6.57 6.23 6.63
B-8R	2017-Apr 2017-Oct 2018-Apr 2018-Oct 2019-Apr 2019-Oct 2020-Apr 2020-Oct 2021-Apr 2021-Oct 2022-Apr	127 159 115 89.8 95.7 140 90.8 145	<0.50 <0.50 <0.50 D3 <0.10 <0.50 D3 <0.50 D3, M0 <0.48 D3	<5.00 <5.00 <5.00 D3 3.40 <5.00 D3	6.60 6.61 6.57 6.23
B-8R	2017-Oct 2018-Apr 2018-Oct 2019-Apr 2019-Oct 2020-Apr 2020-Oct 2021-Apr 2021-Oct 2022-Apr	159 115 89.8 95.7 140 90.8 145	<0.50 <0.50 D3 <0.10 <0.50 D3 <0.50 D3, M0 <0.48 D3	<5.00 <5.00 D3 3.40 <5.00 D3	6.61 6.57 6.23
B-8R	2018-Apr 2018-Oct 2019-Apr 2019-Oct 2020-Apr 2020-Oct 2021-Apr 2021-Oct 2022-Apr	115 89.8 95.7 140 90.8 145	<0.50 D3 <0.10 <0.50 D3 <0.50 D3, M0 <0.48 D3	<5.00 D3 3.40 <5.00 D3	6.57 6.23
B-8R	2018-Oct 2019-Apr 2019-Oct 2020-Apr 2020-Oct 2021-Apr 2021-Oct 2021-Apr	89.8 95.7 140 90.8 145	<0.10 <0.50 D3 <0.50 D3, M0 <0.48 D3	3.40 <5.00 D3	6.23
B-8R	2019-Apr 2019-Oct 2020-Apr 2020-Oct 2021-Apr 2021-Oct 2022-Apr	95.7 140 90.8 145 121	<0.50 D3 <0.50 D3, M0 <0.48 D3	<5.00 D3	
B-8R	2019-Oct 2020-Apr 2020-Oct 2021-Apr 2021-Oct 2022-Apr	140 90.8 145 121	<0.50 D3, M0 <0.48 D3		6.63
B-8R	2020-Apr 2020-Oct 2021-Apr 2021-Oct 2022-Apr	90.8 145 121	<0.48 D3	< 5.00 D3	2.00
B-8R	2020-Oct 2021-Apr 2021-Oct 2022-Apr	145 121		~J.UU DJ	6.62
B-8R	2020-Oct 2021-Apr 2021-Oct 2022-Apr	121		5.20 J, D3	6.60
B-8R	2021-Apr 2021-Oct 2022-Apr	121	<0.48	<2.20 D3	6.35
B-8R	2021-Oct 2022-Apr		<0.48 D3	<2.20 D3	6.54
B-8R	2022-Apr				
B-8R		93.1	<0.48 D3, M0	5.0 J, D3	6.43
b-ok		2,250	0.26 J	30.0	6.64
	'				
	2016-Oct	2,130	0.21 J	47.0	6.38
	2017-Apr	1,970	0.16 J	30.5	6.83
	2017-Oct	2,490	0.30 J	32.5	6.87
	2018-Apr	1,700	0.14 J	28.7	7.02
	2018-Oct	1,500	0.25 J	30.6	6.18
	2019-Apr	1,560	0.24 J	39.8	6.65
	2019-Oct	1,110	0.49	23.6	6.85
	2020-Apr	1,340	0.27 J	20.9	6.61
	2020-Oct	1,600	0.36	63.9	6.60
	2021-Apr	1,310	0.28 J	25.0	6.54
	2021-Oct	1,730	0.19 J	42.3	6.48
	2022-Apr	1,320	0.17 J	23.8	6.52
B-11A	2016-Apr	110	0.24 J	3.80 J	7.75
D-117			0.28 J		
	2016-Oct	111		2.80 J	7.47
	2017-Apr	106	0.35	<1.00	7.38
	2017-Oct	97.7	0.34	8.30	7.91
	2018-Apr	89.4	0.30 J	12.70	8.04
	2018-Oct	142	0.16 J	5.30	7.43
	2019-Apr	94.0	0.29 J	1.90 J	7.62
	2019-Oct	82.3	0.27 J	<1.00	7.66
	2020-Apr	83.3	0.17 J	1.50 J	7.75
	2020-Oct	94.3	0.30 J	1.0 J	7.74
	2021-Apr	92.9	0.23 J	3.5	7.65
	2021-Oct	97.6	0.24 J	7.3	7.49
	2022-Apr	87.0	0.23 J	9.1	7.53
B-11B	2016-Apr	1,240	0.53	153	8.14
D-IID		1,410	0.54	181	7.91
	2016-Oct				
	2017-Apr	1,720	0.56	186	7.83
	2017-Oct	1,900	0.65	169	7.80
	2018-Apr	2,020	0.68	195	8.42
	2018-Oct	3,910	0.41	195	7.74
	2019-Apr	6,670	0.60	289	7.91
	2019-Oct	4,860	0.64	335	7.92
	2020-Apr	5,080	< 0.095	362	7.89
	2020-Oct	3,190	< 0.095	422	7.80
	2021-Apr	4,590	<0.095	389	8.07
	2021-Oct	2,480	0.49	468	7.72
	2022-Apr	2,690	0.44	494	7.63
B-11R	2016-Apr	3,290	<1.00	93.9	6.98
5	2016-Oct	4,070	<0.50	115	6.77
	2016-OC1 2017-Apr	3,710	<0.50	111	7.11
	2017-Apr 2017-Oct	3,400	<0.50	94.0	6.75
	2018-Apr	2,790	<0.50 D3	78.6	7.14
	2018-Oct	635	0.14 J	15.6	6.55
	2019-Apr	1,310	0.19 J	34.5	6.82
	2019-Oct	1,500	0.28 J	39.2	6.83
	2020-Apr	2,250	<0.48 D3	39.8	6.80
	2020-Oct	2,690	<0.48	23.0	6.83
	2021-Apr	2,890	<0.48 D3	59.9	7.11
	2021-Oct	3,050	<0.48 D3	61.6	6.86
	2022-Apr	2,330	<0.48 D3	58.1	7.01
B-26	2016-Apr	37.0	<0.20	40.1	7.43
	2016-Oct	48.7	0.12 J	34.4	7.19
	2017-Apr	37.3	<0.10	32.3	7.54
	2017-Oct	44.5	<0.10	25.0	7.35
	2018-Apr	46.8	<0.10	19.2	7.64
	2018-Oct	55.2	<0.10	24.9	7.20
	2019-Apr	41.8	<0.10	26.4	7.10
	2019-Oct	50.8	0.11 J	37.0	7.24
	2020-Apr	49.2	<0.095	29.1	7.27
	2020-Oct	61.4	<0.095	37.1	7.34
	2021-Apr	67.1	<0.095	35.5	7.27
	2021-Apr	56.0	<0.075	43.0	7.18
	2021-OC1 2022-Apr	50.3	0.098 J	33.5	7.16

Table 4. Analytical Results - State Monitoring Program Nelson Dewey Generating Station Cassville, Wisconsin / SCS Engineers Project #25222071.00

WELL ID	SAMPLE MONTH	BORON, DISSOLVED (UG/L)	FLUORIDE, DISSOLVED (MG/L)	SULFATE, DISSOLVED (MG/L)	PH, FIELD (STANDARD UNITS)
B-26A	2016-Apr	33.1	<0.20	40.1	7.06
	2016-Oct	30.5	0.14 J	39.9	7.26
	2017-Apr	52.6	0.47	42.3	7.96
	2017-Oct	28.4	<0.10	38.4	7.44
	2018-Apr	27.6	<0.10	37.0	7.47
	2018-Oct	18.4	<0.10	33.3	7.38
	2019-Apr	27.6	0.11 J	27.0	7.35
	2019-Oct	47.0	0.14 J	35.6	7.31
	2020-Apr	37.7	<0.095	39.2 M0	7.38
	2020-Oct	33.5	<0.095	44.7	7.51
	2021-Apr	42.7	<0.095	45.5	7.26
	2021-Oct	36.4	<0.095	49.7	7.45
	2022-Apr	29.8	0.11 J	53.2	7.39
B-31A	2016-Apr	69.4	0.22 J	22.8	7.63
	2016-Oct	81.0	0.18 J	27.9	7.54
	2017-Apr	80.3	0.19 J	30.8	7.83
	2017-Oct	61.5	0.21 J	26.2	7.60
	2018-Apr	69.3	0.17 J	28.1	8.00
	2018-Oct	103	0.14 J	26.2	7.48
	2019-Apr	86.0	0.22 J	21.6	7.61
	2019-Oct	112	0.23 J	22.5	7.69
	2020-Apr	121	0.15 J	17.7	7.71
	2020-Apr	146	0.18 J	16.8	7.78
	2021-Apr	168	0.16 J	17.1	7.70
	2021-Apr	188	0.14 J	15.0	7.58
		179	0.17 J 0.18 J	15.3	7.82
D 01D	2022-Apr			34.3	
B-31R	2016-Apr	759	<0.20		6.76
	2016-Oct	956	0.16 J	48.5	6.53
	2017-Apr	910	0.12 J	42.9	6.80
	2017-Oct	618	0.20 J	23.2	6.78
	2018-Apr	520	0.11 J	23.3	6.76
	2018-Oct	1,530	<1.00 D3	179	6.41
	2019-Apr	892	0.17 J, D3	114	6.62
	2019-Oct	1,000	0.26 J	145	6.72
	2020-Apr	765	0.28 J, M0	97.6 M0	6.79
	2020-Oct	696	0.28 J	50.8	6.89
	2021-Apr	597	0.19 J	44.9	6.91
	2021-Oct	356	<0.48	25.1	6.83
	2022-Apr	425	0.24 J	57.4	6.77
B-35	2016-Apr	38.7	<0.20	8.10	6.89
	2016-Oct	46.4	0.10 J	6.50	6.86
	2017-Apr	54.4	0.15 J	7.70	6.68
	2017-Oct	40.8	0.18 J	3.80	7.65
	2018-Apr	28.9	<0.10 M0	4.80 M0	7.01
	2018-Oct	40.0	0.13 J	3.60	6.58
	2019-Apr	33.6	<0.10	4.90	7.26
	2019-Oct	41.0	0.12 J	5.60	7.07
	2020-Apr	27.0	< 0.095	4.20	6.87
	2020-Oct	28.1	0.097 J	5.60	6.85
	2021-Apr	23.8	0.12 J	5.90	6.89
	2021-Oct				
	2022-Apr	22.7	<0.095	7.7	6.95
B-35A	2016-Apr	21.7	<0.20	26.2	6.96
J 5557 1	2016-Oct	23.4	0.16 J	27.4	7.17
	2010-OC1	29.9	<0.10	25.4	7.17
	2017-Apr	51.4	0.26 J	4.00	7.44
	2018-Apr	28.9	<0.10 M0	23.1	7.45
	2018-Oct	59.8	<0.50 D3	6.00 J, D3	6.95
	2019-Apr	30.3	0.12 J	16.7	7.30
	2019-Apr	33.7	0.12 J	18.9	7.30
	2020-Apr	32.1	0.13 J 0.12 J	20.2	7.30
	2020-Apr 2020-Oct				7.39
		70.7	<0.095	17.8	
	2021-Apr	46.8	<0.095	18.9	7.26
	2021-Oct	52.7	<0.095	18.7	7.27
	2022-Apr	46.5	0.11 J, M0	16.2	7.13
B-36	2021-Oct	24.7	0.13 J	2.80	7.34
_	2022-Apr	27.2	0.14 J	3.2	7.23
B-36A	2021-Oct	20.7	<0.095	17.6	7.43
	2022-Apr	29.5	0.13 J	13.7	7.26

Abbreviations:

- D3: Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.
- M0: Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.

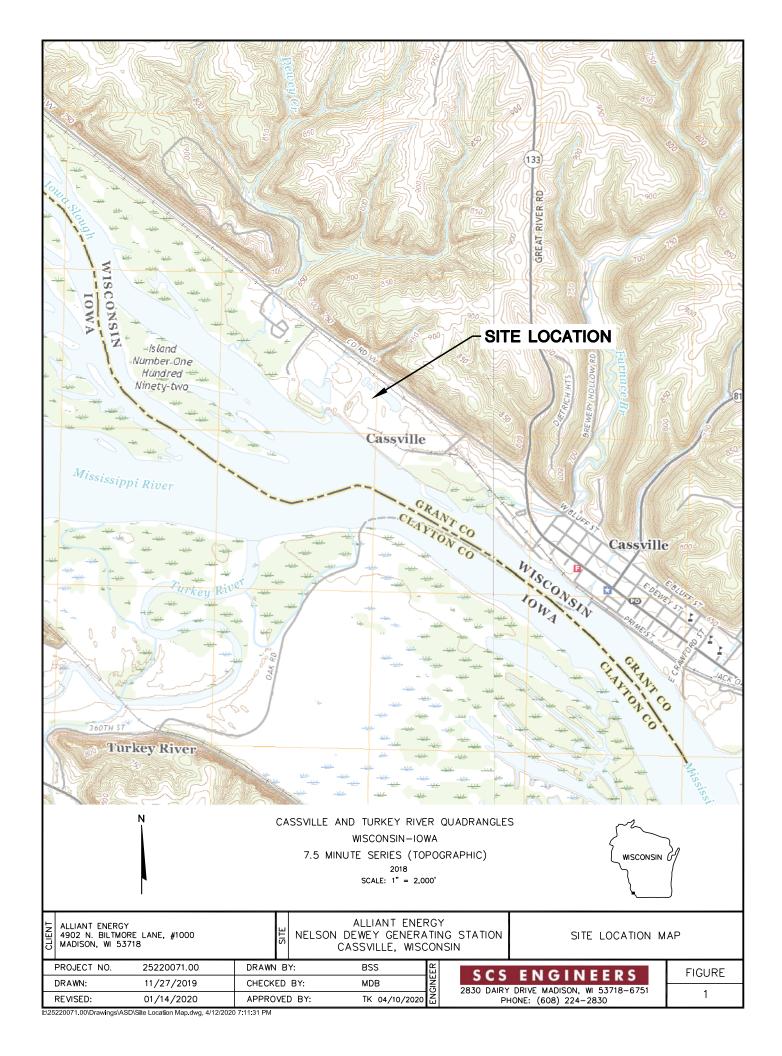
Notes:

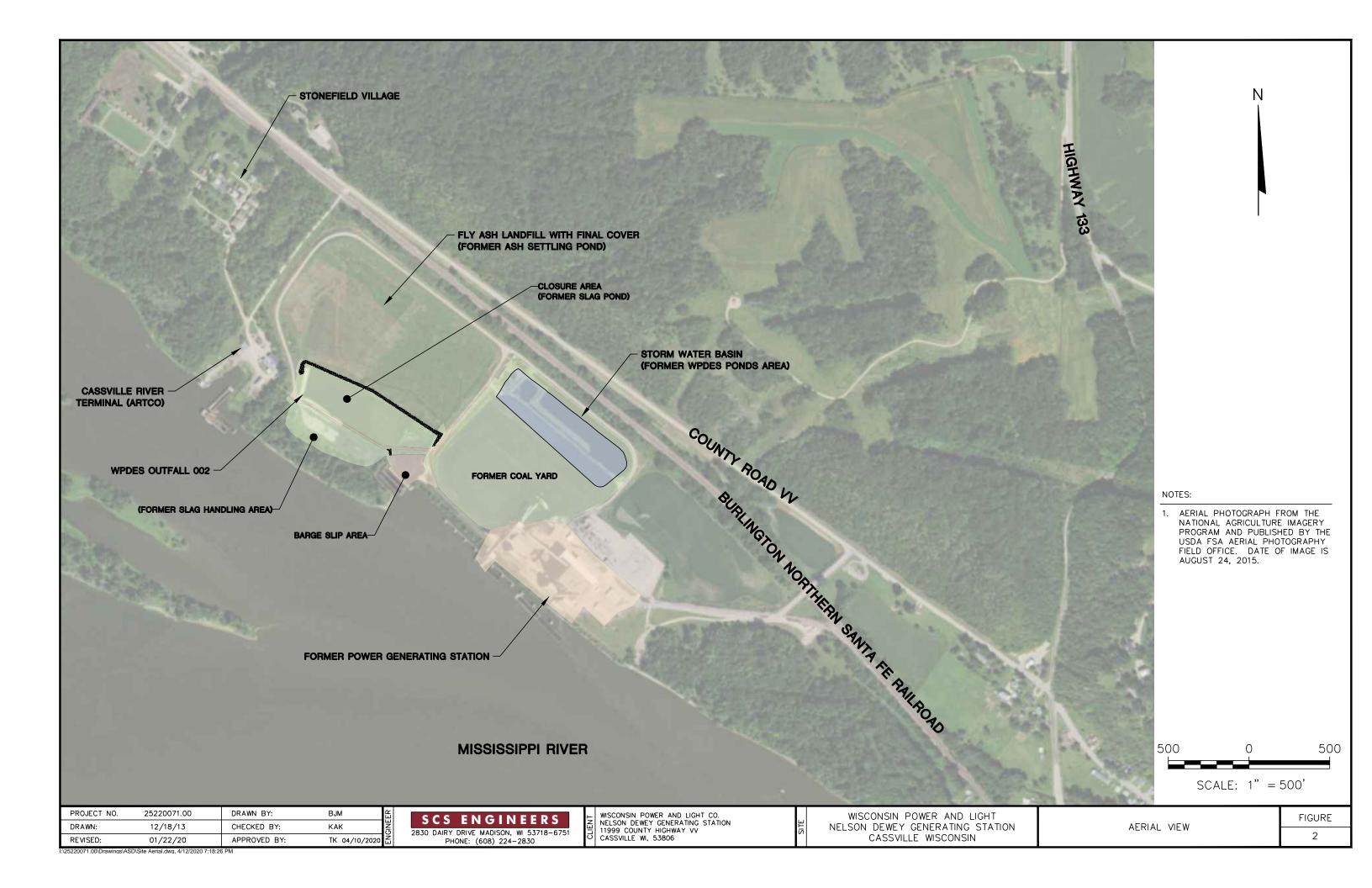
- (1) B-7R and B-35 were dry during October sampling event.
- (2) B-37 and B-37A were abandoned 12/6/2022. B-36 and B-36A were added prior to the October 2021 Sampling event.

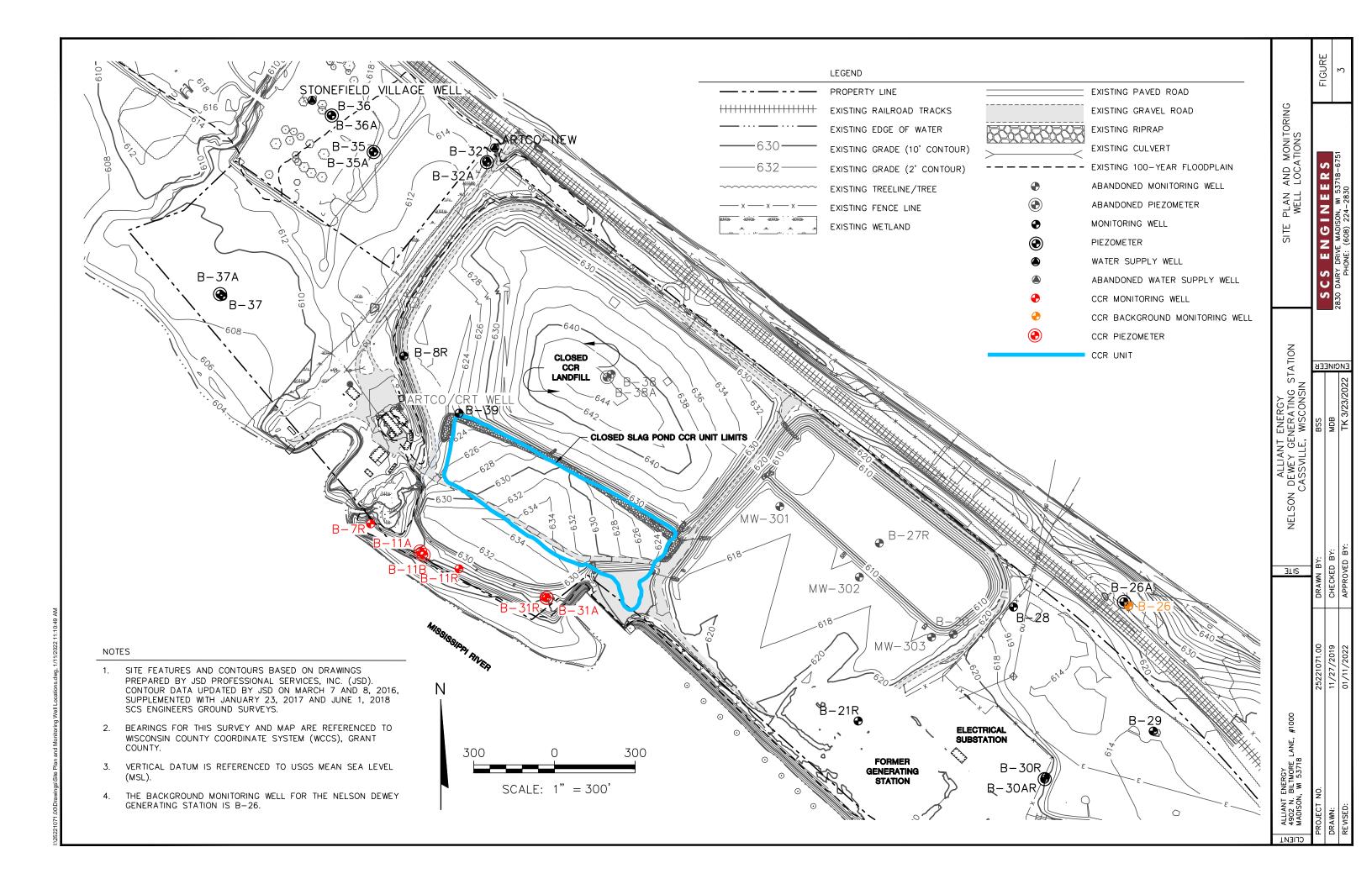
Created by: JSN	Date: 12/29/2017
Last revision by: RM	Date: 7/27/2022
Checked by: JJK	Date: 8/3/2022

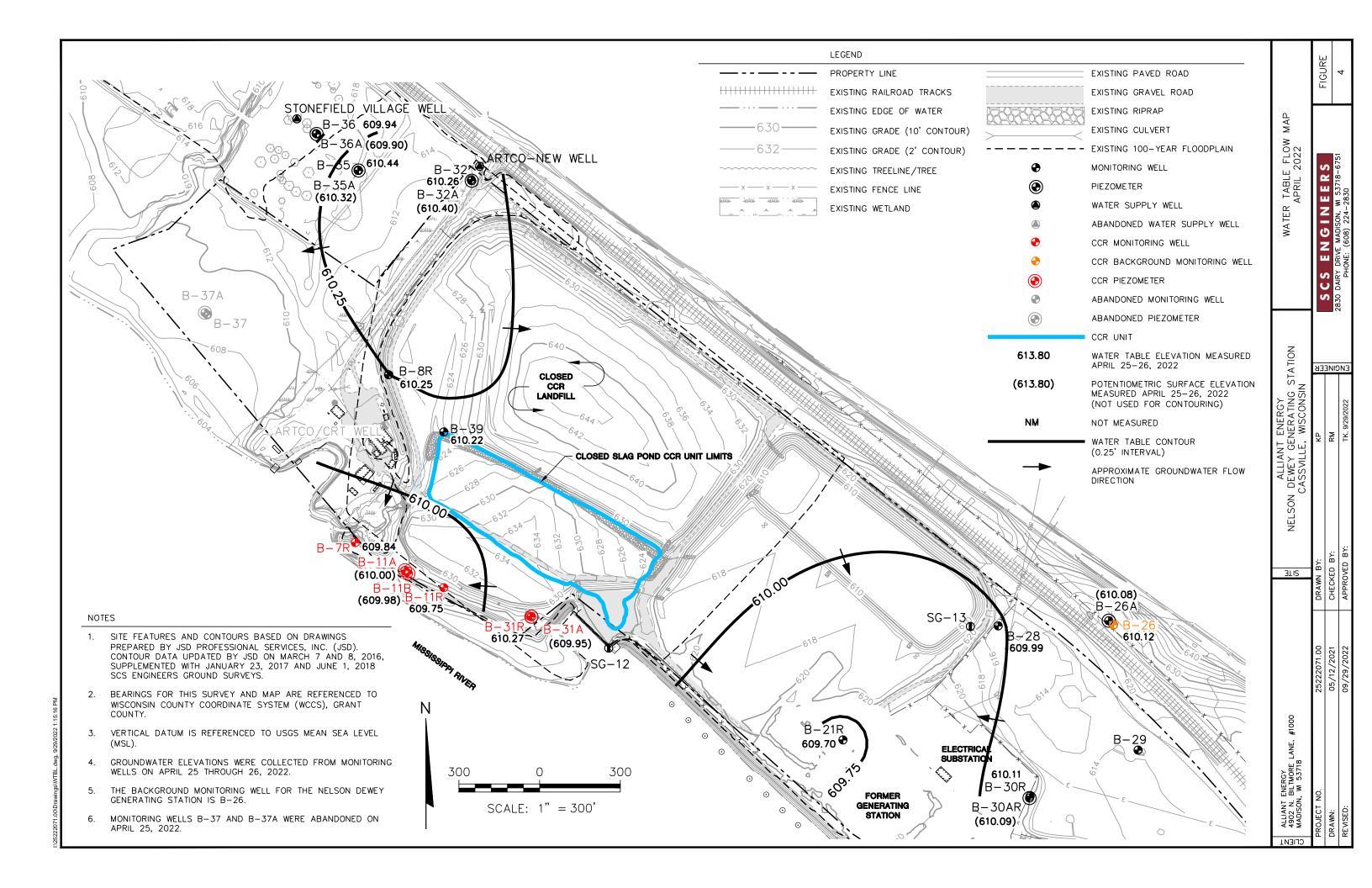
Figures

- 1 Site Location Map
- 2 Aerial View
- 3 Site Plan and Monitoring Well Locations
- 4 Water Table Flow Map April 2022



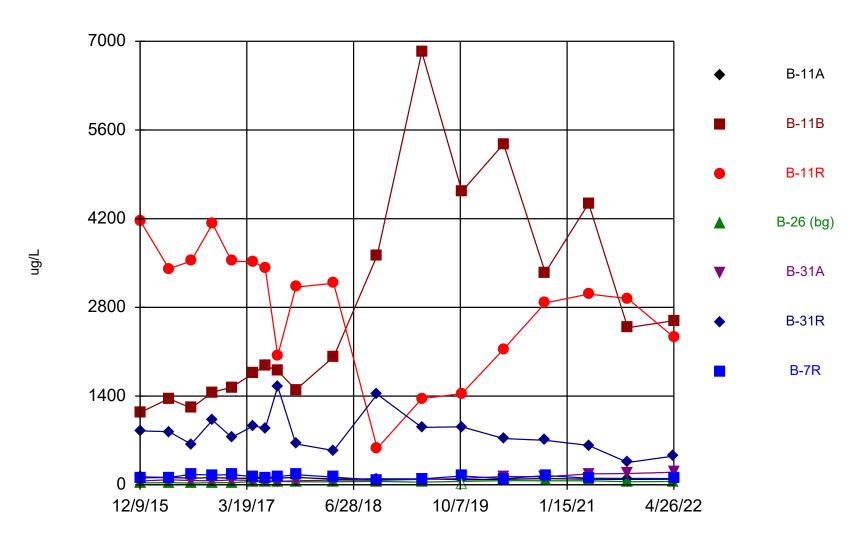






Appendix A CCR Well Trend Plots

Boron

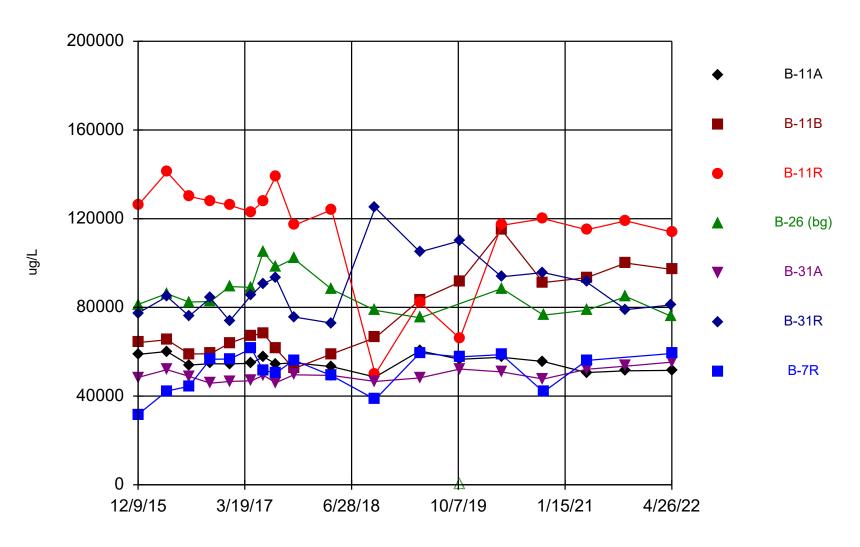


Time Series Analysis Run 7/27/2022 8:59 AM

Constituent: Boron (ug/L) Analysis Run 7/27/2022 9:00 AM

				oting Station Clier			point- export-Dec2020		
			veison Dewey Genera	aurig Station Clier	it: 5C5 Engineers	Data: NED - Chem	ipoint- export-Dec2020	 	
	B-11A	B-11B	B-11R	B-26 (bg)	B-31A	B-31R	B-7R		
12/9/2015	124	1140	4170	29.6	59	851	110		
4/12/2016				33.7					
4/13/2016	116	1360	3410		79.2	838	115		
7/18/2016							164		
7/19/2016	104	1210	3530	28.6	67.2	641			
10/19/2016	112						154		
10/20/2016		1460	4120	33	63.7	1020			
1/12/2017	106	1540	3530	35.2	76.4	749	159		
4/17/2017	100	1760	3520	50.1	69.9	929	129		
6/7/2017			3420	45.8			110		
6/8/2017	102	1880			58.5	895			
8/1/2017	105	1800	2040		56.3	1550	129		
8/2/2017				54.6					
10/19/2017	116	1500	3120	47.4	63.9	645	159		
4/2/2018	91	2020	3180		74.8	540	121		
4/3/2018				48					
10/8/2018				53.4					
10/9/2018	94.2	3620	576		71.8	1430	73		
4/22/2019	93.9	6830	1360		86.2	906	93.5		
4/23/2019				41.6					
10/14/2019	80.7	4630	1440		98.5	915	139		
10/15/2019				<3 (UX)					
4/13/2020	86.3	5380	2140		132	730	96		
4/14/2020				66.1					
10/12/2020	99.3	3350	2870		127	702			
10/13/2020				63.6			145		
4/19/2021	88.1	4440	3010		172	621			
4/20/2021							104		
4/21/2021				63.6					
10/7/2021	85.4	2480	2940		178	353			
10/8/2021				48.4					
4/25/2022				52.5		454			
4/26/2022	88.6	2590	2330		198		98.1		

Calcium



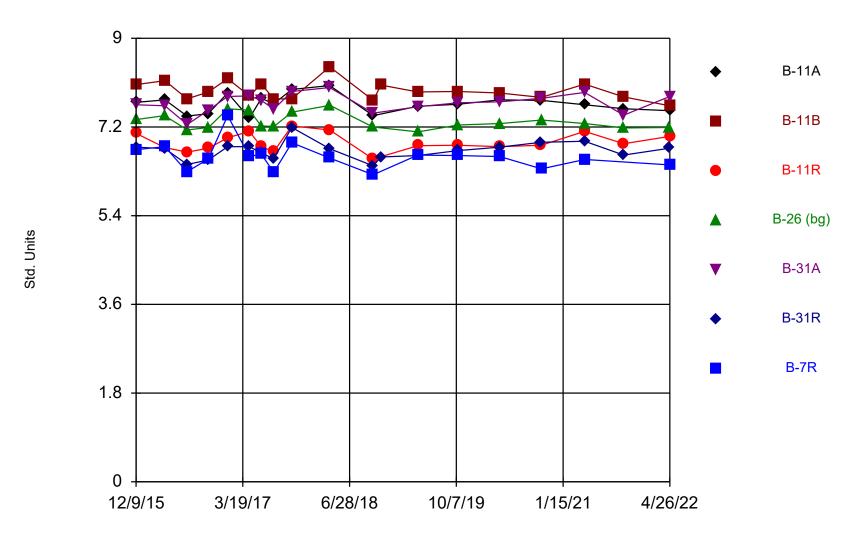
Time Series Analysis Run 7/27/2022 8:59 AM

Constituent: Calcium (ug/L) Analysis Run 7/27/2022 9:00 AM

Nelson Dewey Generating Station Client: SCS Engineers Data: NED - Chempoint- export-Dec2020

			, ,				
·	B-11A	B-11B	B-11R	B-26 (bg)	B-31A	B-31R	B-7R
12/9/2015	58800	64100	126000	81300	48400	77400	31700
4/12/2016				86200			
4/13/2016	60100	65400	141000		51900	84900	42300
7/18/2016							44400
7/19/2016	54000	59000	130000	82400	48900	76100	
10/19/2016	54600						56600
10/20/2016		59100	128000	82700	45800	84200	
1/12/2017	54500	63900	126000	89400	46600	73900	56700
4/17/2017	54800	67400	123000	89000	46900	85600	61400
6/7/2017			128000	105000			51600
6/8/2017	57800	68200			49400	90700	
8/1/2017	54500	61400	139000		46000	93400	50400
8/2/2017				98100			
10/19/2017	55000	52400	117000	102000	49600	75700	56200
4/2/2018	53300	59000	124000		49300	72900	49200
4/3/2018				88100			
10/8/2018				78700			
10/9/2018	48600	66300	49900		46600	125000	38500
4/22/2019	60400	83300	82400		48200	105000	59400
4/23/2019				75300			
10/14/2019	56600	91400	66000		52200	110000	57700
10/15/2019				<76.2 (UX)			
4/13/2020	57500	115000	117000		50900	93800	58700
4/14/2020				88500			
10/12/2020	55600	91200	120000		47700	95700	
10/13/2020				76500			41900
4/19/2021	50600	93400	115000		52100	91400	
4/20/2021							56100
4/21/2021				78700			
10/7/2021	51400	100000	119000		53500	79000	
10/8/2021				84900			
4/25/2022				75900		81100	
4/26/2022	51600	97100	114000		55300		59200

Field pH

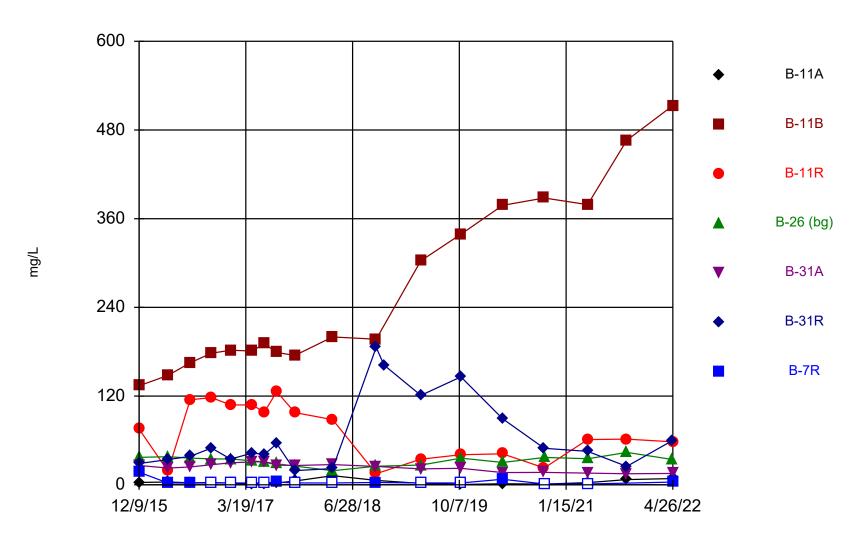


Time Series Analysis Run 7/27/2022 8:59 AM

Constituent: Field pH (Std. Units) Analysis Run 7/27/2022 9:00 AM

		Nata	on Dewey Generating	Station Client: S			
		ineis	on Dewey Generating	J Station Client: S	Co Engineers Da	ia. NED - Criempoin	r- export-decaudu
	B-11A	B-11B	B-11R	B-26 (bg)	B-31A	B-31R	B-7R
12/9/2015	7.7	8.06	7.07	7.35	7.65	6.79	6.74
4/12/2016				7.43			
4/13/2016	7.75	8.14	6.78		7.63	6.76	6.8
7/18/2016							6.29
7/19/2016	7.42	7.77	6.69	7.14	7.25	6.44	
10/19/2016	7.47						6.55
10/20/2016		7.91	6.77	7.19	7.54	6.53	
1/12/2017	7.89	8.18	6.98	7.57	7.82	6.8	7.43
4/17/2017	7.38	7.83	7.11	7.54	7.83	6.8	6.6
6/7/2017			6.8	7.22			6.65
6/8/2017	7.78	8.07			7.74	6.67	
8/1/2017	7.67	7.77	6.7		7.56	6.56	6.28
8/2/2017				7.21			
10/19/2017	7.96	7.77	7.22	7.5	7.92	7.19	6.88
4/2/2018	8.04	8.42	7.14		8	6.76	6.57
4/3/2018				7.64			
10/8/2018				7.2			
10/9/2018	7.43	7.74	6.55		7.48	6.41	6.23
11/12/2018		8.05				6.59	
4/22/2019	7.62	7.91	6.82		7.61	6.62	6.63
4/23/2019				7.1			
10/14/2019	7.66	7.92	6.83		7.69	6.72	6.62
10/15/2019				7.24			
4/13/2020	7.75	7.89	6.8		7.71	6.79	6.6
4/14/2020				7.27			
10/12/2020	7.74	7.8	6.83		7.78	6.89	
10/13/2020				7.34			6.35
4/19/2021	7.65	8.07	7.11		7.9	6.91	
4/20/2021							6.54
4/21/2021				7.27			
10/7/2021	7.57	7.81	6.86		7.44	6.63	
10/8/2021				7.18			
4/25/2022				7.19		6.77	
4/26/2022	7.53	7.63	7.01		7.82		6.43

Sulfate



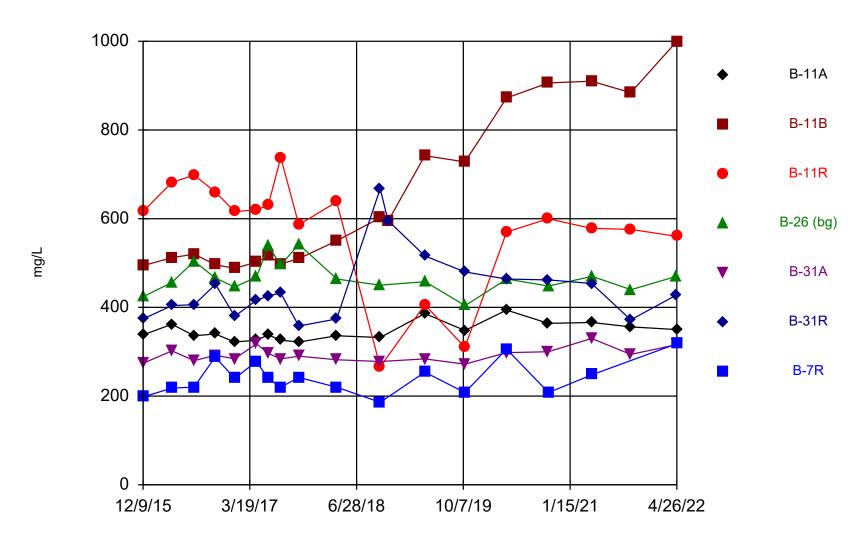
Time Series Analysis Run 7/27/2022 8:59 AM

Constituent: Sulfate (mg/L) Analysis Run 7/27/2022 9:00 AM

Nelson Dewey Generating Station Client: SCS Engineers Data: NED - Chempoint- export-Dec2020

		14010011	Dewey denotating	Oldflori Ollorit. Oc	DO Engineero Dati	u. NED Onomponi	OXPORT DOCEDED
	B-11A	B-11B	B-11R	B-26 (bg)	B-31A	B-31R	B-7R
12/9/2015	3.2 (J)	134	75.4	37.1	26.2	28.8	17 (J)
4/12/2016				38			
4/13/2016	3.8 (J)	148	18.4		22.6	34.1	2.5 (J)
7/18/2016							2.4 (J)
7/19/2016	2.7 (J)	165	115	36.2	24.2	38.5	
10/19/2016	3 (J)						<5 (U)
10/20/2016		178	118	35	27.2	49.7	
1/12/2017	2.3 (J)	182	108	35	29.8	34.9	<5 (U)
4/17/2017	<1 (U)	181	108	32.4	31	43	<5 (U)
6/7/2017			98.2	31			<5 (U)
6/8/2017	1.4 (J)	191			31.2	41.1	
8/1/2017	2.4 (J)	179	126		26.6	55.6	3.7
8/2/2017				28.5			
10/19/2017	5.1	175	97.7	25.3	26.1	19.2	<5 (U)
4/2/2018	12.3	200	88.1		27.4	22	<5 (U)
4/3/2018				19.1			
10/8/2018				25.1			
10/9/2018	6	197	15.1		24.8	186	3.2
11/12/2018						162	
4/22/2019	1.9 (J)	303	34.6		21.6	121	<5 (U)
4/23/2019				26.7			
10/14/2019	<1 (U)	339	40.7		22.3	146	<5 (U)
10/15/2019				36			
4/13/2020	1.4 (J)	378	41.9		16.6	89.4	7.5 (J)
4/14/2020				30.2			
10/12/2020	1 (J)	388	22.8		16.8	49.4	
10/13/2020				37			<2.2 (U)
4/19/2021	2.9	379	61.2		15.8	45.3	
4/20/2021							<2.2
4/21/2021				35.3			
10/7/2021	7	466	61.8		14.9	24.9	
10/8/2021				43.8			
4/25/2022				34.2		60	
4/26/2022	8.5	513	58.1		15.4		3.7 (J)

Total Dissolved Solids



Time Series Analysis Run 7/27/2022 8:59 AM

Constituent: Total Dissolved Solids (mg/L) Analysis Run 7/27/2022 9:00 AM

Nelson Dewey Generating Station Client: SCS Engineers Data: NED - Chempoint- export-Dec2020

	B-11A	B-11B	B-11R	B-26 (bg)	B-31A	B-31R	B-7R
12/9/2015	338	494	616	424	274	374	198
4/12/2016				456			
4/13/2016	362	512	682		302	404	218
7/18/2016							220
7/19/2016	336	520	698	504	280	406	
10/19/2016	340						288
10/20/2016		496	660	466	292	452	
1/12/2017	322	488	616	446	284	380	240
4/17/2017	326	502	620	468	318	416	278
6/7/2017			630	538			240
6/8/2017	338	516			296	426	
8/1/2017	326	498	738		284	432	220
8/2/2017				496			
10/19/2017	322	510	586	542	290	358	242
4/2/2018	336	550	638		282	374	220
4/3/2018				464			
10/8/2018				450			
10/9/2018	332	602	266		278	668	186
11/12/2018		594				596	
4/22/2019	386	742	406		284	516	254
4/23/2019				458			
10/14/2019	348	728	310		272	480	208
10/15/2019				404			
4/13/2020	394	872	570		298	464	306
4/14/2020				464			
10/12/2020	364	906	600		300	462	
10/13/2020				448			208
4/19/2021	366	910	578		330	454	
4/20/2021							248
4/21/2021				470			
10/7/2021	356	884	576		294	372	
10/8/2021				440			
4/25/2022				470		428	
4/26/2022	350	1000	560		316		318

Appendix B 1994 RMT Environmental Contamination Assessment Information

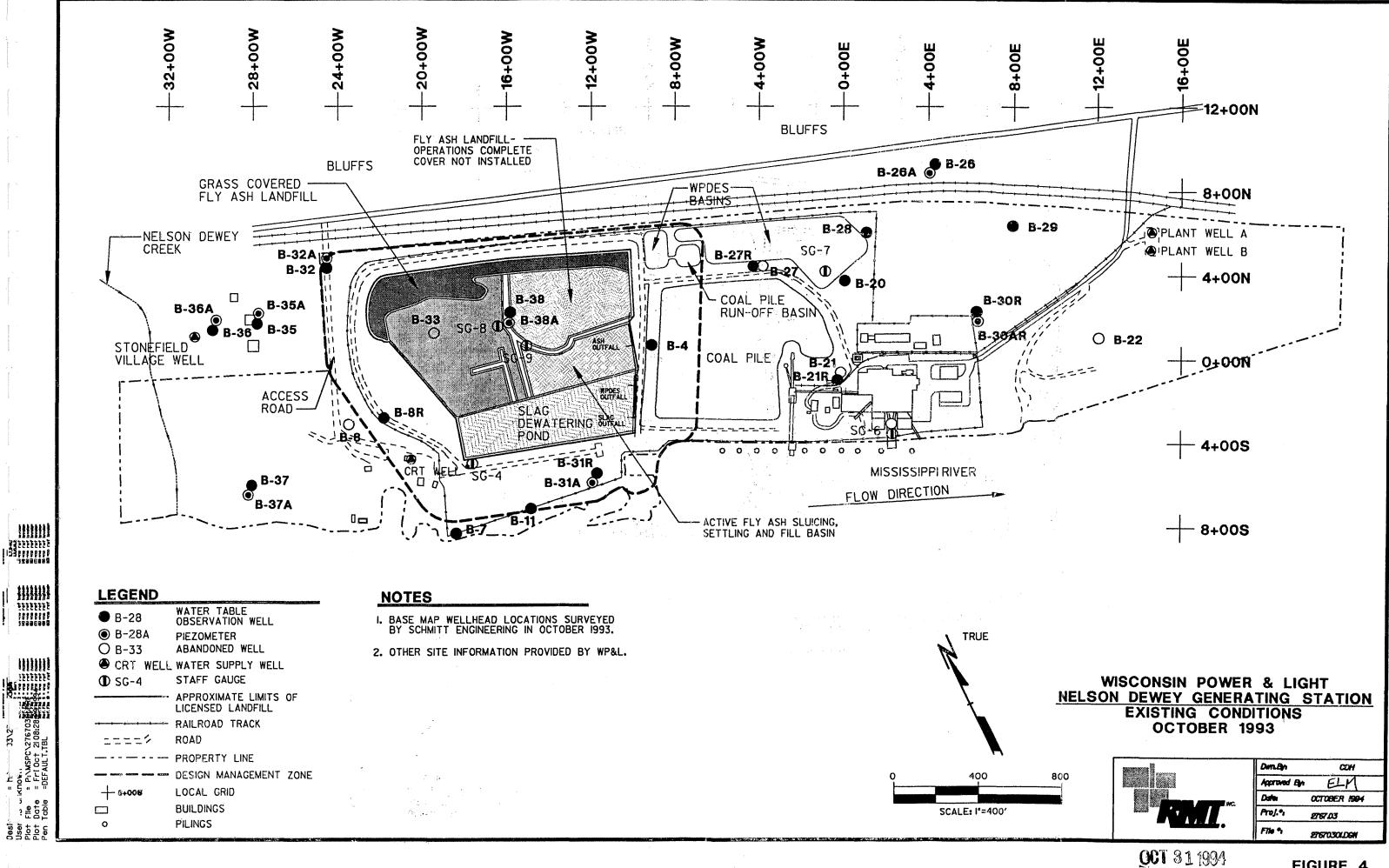


TABLE 5 **SUMMARY OF LEACHING TEST RESULTS**

	Fly	Fly Ash						
Year	1983	1990 to 1992	1987 to 1992					
Coal Type	Eastern (and Western)	Western (and Eastern)	Western (and Eastern) i					
Water:Solid Ratio	2:1	4:1	4:1					
Extraction Time	24 hours	48 hours	48 hours					
Number of Samples	1	3	6					
Arsenic (mg/L)	< 0.001	0.05 to 2.02	< 0.002 to 0.081					
Selenium (mg/L)	NA	0.42 to 160	< 0.002 to 0.045					
Boron (mg/L)	420	4.63 to 37.34	< 0.010 to 1.05					
Iron (mg/L)	NA	NA NA	< 0.02 to 0.98					
Sulfate (mg/L)	13,070	2,000 to 16,700	2.0 to < 5.0					
pH (SU)	6.6	10.3 to 12.5	5.6 to 9.9					

NOTES:

- 1983 fly ash leaching data from RMT (1984); remaining leaching data provided by WP&L. NA = Not Analyzed. 1.
- 2.

BEGINNING DATE: 01-JUN-93

07-SEP-93 ENDING DATE:

TABLE 6 SLAG AND ASH BASIN CHEMISTRY

FLY ASH BASIN

SLAG BASIN

07-SEP-93

3300

60

11

07-SEP-93

DADAMETED

3302-011

PARAMETER	UN115 33	002-011	3302-010
COLOR, FIELD		CLEAR	CLEAR
CONDUCTANCE, SPECIFIC	UMHOS/CM	5190	400
ODOR, FIELD		NONE	NONE
PH, FIELD	SU	8.1	7.4
TEMPERATURE	DEG C	17	18
TURBIDITY, FIELD		SLIGHT	SLIGHT
ALKALINITY AS CACO3	MG/L	230	160
HARDNESS AS CACO3	MG/L	930	200
SOLIDS, TOTAL DISSOLVED	MG/L	410	300

MG/L

UG/L

UG/L

UG/L

UG/L

UG/L

UG/L

UG/L

ARSENIC, TOTAL

BARIUM, TOTAL

BORON, TOTAL

CADMIUM, TOTAL

CHROMIUM, TOTAL IRON, TOTAL LEAD, TOTAL

MERCURY, TOTAL UG/L SELENIUM, TOTAL UG/L SILVER, TOTAL UG/L

3302-010

270 2300 210 5.4 0.30 < 10 1600 2000

< 3.0 < 3.0 0.20 0.20

36 I 2.1 < 1.0 < 1.0

L

PAGE 1

18-OCT-94

wpvalid:SWI.BJC

BEGINNING DATE: 01-JUN-93

ENDING DATE:

29-OCT-93

TABLE 8 GROUNDWATER CHEMISTRY

B-04 B-04 B-07 ND B-07 ND B-08 B-08R 01-JUN-93 07-SEP-93 01-JUN-93 07-SEP-93 01-JUN-93 07-SEP-93 UNITS 1670-015 3293-010 1670-020 3302-004 1670-001 3293-009 **PARAMETER CLEAR** CLEAR CLEAR **CLEAR** CLEAR COLOR, FIELD CLEAR 1160 1240 460 550 670 UMHOS/CM 1160 CONDUCTANCE, SPECIFIC 16.12 DEPTH TO WATER FEET 9.90 12.75 12.83 5.68 20.13 NONE NONE NONE NONE NONE ODOR, FIELD NONE PH, FIELD SU 7.3 7.5 7.0 6.9 7.1 6.8 DEG C 15 10 14 12 15 7 **TEMPERATURE** NONE NONE SLIGHT SLIGHT NONE TURBIDITY, FIELD MODERATE FEET 610.68 607.83 610.97 607.68 610.51 WATER ELEVATION 72 92 . 160 190 ALKALINITY AS CACO3 MG/L 220 440 CHLORIDE MG/L 18 23 17 15 9.4 2.8 COD MG/L MG/L ₽.58 5.5 0.26 0.32 FLUORIDE 0.10 0.12 220 MG/L 120 210 250 HARDNESS AS CACO3 370 620 MG/L 0.15 0.33 0.050 0.050 0.050 NITROGEN, NITRATE + NITRITE < 4.2 900 300 SOLIDS, TOTAL DISSOLVED MG/L 940 360 460 770 SULFATE MG/L 500 560 74 100 180 180 3.0 3.0 ARSENIC, DISSOLVED UG/L < 3.0 < 3.0 3.0 3.0 68 73 BARIUM, DISSOLVED UG/L < 50 61 63 50 UG/L 1900 4200 230 200 2200 BORON, DISSOLVED < 9400 CADMIUM, DISSOLVED UG/L < 0.30 < 0.30 0.30 < 0.30 0.30 0.38 < UG/L < 10 10 10 < CHROMIUM, DISSOLVED < 10 10 10 UG/L < 20 < 20 < 20 < 20 20 COPPER, DISSOLVED 20 < < 720 890 2800 IRON, DISSOLVED UG/L 4100 100 100 UG/L < 3.0 < 3.0 LEAD, DISSOLVED < 3.0 < 3.0 < 3.0 < 3.0 MANGANESE, DISSOLVED UG/L 1200 720 970 1500 17 3400 UG/L < 0.20 < 0.20 MERCURY, DISSOLVED 0.20 0.20 < 0.20 < 0.20 UG/L 6.9 3.2 1.0 < 1.0 SELENIUM, DISSOLVED L Ł 1.0 L 34 UG/L < 1.0 1.0 1.0 1.0 SILVER, DISSOLVED < < 1.0 < 1.0 UG/L 1000 100 22 < 20 ZINC, DISSOLVED 220 < 20

BEGINNING DATE: 01-JUN-93

TABLE 8
GROUNDWATER CHEMISTRY

ENDING DATE: 2

29-OCT-93

PARAMETER	UNITS	B-11 07-SEP-93 X0001		11 -0CT-93 35-001		B-20 07-SEP-93 x0002		26 Jun-93 70-022			26 -SEP-93 02-005		01	26A - Jun-93 70-023	
COLOR, FIELD								CLEAR			CLEAR			CLEAR	
CONDUCTANCE, SPECIFIC	UMHOS/CI	M 1500				310		610			670			660	
DEPTH TO WATER	FEET	15.91				10.81		16.22			18.85			16.20	
ODOR, FIELD								NONE			NONE			NONE	
PH, FIELD	SU							7.1			7.2			7.0	
TEMPERATURE	DEG C	13		13		14		14			11			15	
TURBIDITY, FIELD								NONE			SLIGHT			NONE	
WATER ELEVATION	FEET							610.18			607.55			610.19	
ALKALINITY AS CACO3	MG/L			470				320			300			340	
CHLORIDE	MG/L							21			43			33	
COD	MG/L														
FLUORIDE	MG/L						<	0.10			0.15		<	0.10	
HARDNESS AS CACO3	MG/L			810				390			410			400	
NITROGEN, NITRATE + NITRITE	MG/L							2.6			4.9			2.0	
SOLIDS, TOTAL DISSOLVED	MG/L			520				440			450			450	
SULFATE	MG/L			360				34			34			33	
ARSENIC, DISSOLVED	UG/L			8.4			<	3.0		<	3.0		<	3.0	
BARIUM, DISSOLVED	UG/L			100				62			68			96	
BORON, DISSOLVED	UG/L			5100			<	200		<	200		<	200	
CADMIUM, DISSOLVED	UG/L		<	0.30			<	0.30		<	0.30		<	0.30	
CHROMIUM, DISSOLVED	UG/L		<	10			<	10		<	10		<	10	
COPPER, DISSOLVED	UG/L						<	20		<	20		<	20	
IRON, DISSOLVED	UG/L			55000			<	100		<	100		<	100	
LEAD, DISSOLVED	UG/L		<	3.0			<	3.0		<	3.0		<	3.0	
MANGANESE, DISSOLVED	UG/L						<	5.0		<	5.0		<	5.0	
MERCURY, DISSOLVED	UG/L		<	0.20			<	0.20		<	0.20		<	0.20	
SELENIUM, DISSOLVED	UG/L		<	1.0	LNP		<	1.0	L	<	1.0	L	<	1.0	L
SILVER, DISSOLVED	UG/L		<	10			<	1.0		<	1.0		<	1.0	
ZINC, DISSOLVED	UG/L						<	20		<	20		<	20	

PROJECT NUMBER: 1831.28

REGINNING DATE: 01-JUN-93

REGINN	ING DATE:	01-30H 33
ENDING	DATE:	29-0CT-93

DEPTH TO WATER FO	MHOS/C	 M	CLEAR		· 					2-003		004		70-013	
DEPTH TO WATER FO	EET	M	//0				CLEAR			CLEAR				CLEAR	
ODOR, FIELD			440		370		190			230		360		220	
•			18.84		14.67		6.40			9.08		9.57		12.33	
DIL ETELD CI			NONE				NONE			NONE				NONE	
PH, FIELD SI	U		7.2				6.1			6.0				7.2	
TEMPERATURE DI	EG C		11		14		17			15		15		17	
TURBIDITY, FIELD			NONE				SLIGHT			MODERATE				NONE	
WATER ELEVATION FI	EET		607.55				610.46			607.74		607.26		610.11	
ALKALINITY AS CACO3 MG	G/L		340				26			54				200	
CHLORIDE MO	G/L		25				4.6			11				13	
COD M	G/L													7.3	
FLUORIDE M	G/L		0.15			<	0.10		<	0.10				0.10	
HARDNESS AS CACO3	G/L		410				82			110				220	
NITROGEN, NITRATE + NITRITE M	G/L		1.8				2.7			0.60			<	0.050	
SOLIDS, TOTAL DISSOLVED M	G/L		440				140			160				280	
SULFATE M	G/L		38				45			42				27	
ARSENIC, DISSOLVED U	G/L	<	3.0			<	3.0		<	3.0			<	3.0	
BARIUM, DISSOLVED U	G/L		86			<	50			52			<	50	
BORON, DISSOLVED U	G/L	<	200			<	200		<	200			<	200	
CADMIUM, DISSOLVED U	G/L	<	0.30			<	0.30		<	0.30			<	0.30	
CHROMIUM, DISSOLVED U	IG/L	<	10			<	10		<	10			<	10	
COPPER, DISSOLVED U	IG/L	<	20			<	20		<	20			<	20	
IRON, DISSOLVED U	IG/L	<	100				210		<	100			<	100	
LEAD, DISSOLVED U	IG/L	<	3.0			<	3.0		<	3.0			<	3.0	
MANGANESE, DISSOLVED U	IG/L	<	5.0				8.6		<	5.0			<	5.0	
MERCURY, DISSOLVED U	IG/L	<	0.20			<	0.20		<	0.20			<	0.20	
•	IG/L	<	1.0	LN		<	1.0	L	<	1.0	L		<	1.0	L
•	IG/L	<	1.0			<	1.0		<	1.0			<	1.0	
· ·	IG/L	<	20			<	20		<	20			<	20	

BEGINNING DATE: 01-JUN-93

ENDING DATE: 29-OCT-93

PARAMETER	UNITS	07	30AR -SEP-93 02-002		01	30r -Jun-93 70-012		07	30R -SEP-93 02-001	01	31A - JUN-93 70-019		07	31A -SEP-93 93-011		01	31R - JUN-93 70-018		
COLOR, FIELD			CLEAR			CLEAR			CLEAR		CLEAR			CLEAR			CLEAR		- ,
CONDUCTANCE, SPECIFIC	UMHOS/	CM	410			420			360		700			800			640		
DEPTH TO WATER	FEET		15.37			12.25			15.17		12.21			15.93			11.56		
ODOR, FIELD			NONE			NONE			NONE		NONE			NONE			NONE		
PH, FIELD	SU		7.3			7.0			6.8		6.9			7.3			6.8		
TEMPERATURE	DEG C		12			16			14		17			14			17		
TURBIDITY, FIELD			NONE			MODERAT	Έ		MODERATE		NONE			SLIGHT			SLIGHT		
WATER ELEVATION	FEET		607.07			610.10			607.18		610.46			606.74			610.85		
ALKALINITY AS CACO3	MG/L		190			160			140		170			160			240		
CHLORIDE	MG/L		14			13			6.6		16			17			11		
COD	MG/L					9.7													
FLUORIDE	MG/L		0.16		<	0.10		<	0.10		0.39			0.43		<	0.10		
HARDNESS AS CACO3	MG/L		230			210			210		120			160			330		
NITROGEN, NITRATE + NITRITE	MG/L	<	0.050			8.5			8.8	<	0.050		<	0.050		<	0.050		
SOLIDS, TOTAL DISSOLVED	MG/L		280			280			230		510			570			510		
SULFATE	MG/L		25			25			26		250			250			150		
ARSENIC, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0	<	3.0		<	3.0		<	3.0		
BARIUM, DISSOLVED	UG/L	<	50		<	50		<	50		54			66			110		
BORON, DISSOLVED	UG/L	<	200		<	200		<	200		2900			2100			2900		
CADMIUM, DISSOLVED	UG/L	<	0.30		<	0.30		<	0.30	<	0.30		<	0.30			2.7		
CHROMIUM, DISSOLVED	UG/L	<	10		<	10		<	10	<	10		<	10		<	10		
COPPER, DISSOLVED	UG/L	<	20		<	20		<	20	<	20		<	20			110		
IRON, DISSOLVED	UG/L	<	100		<	100		<	100		210			300			450		
LEAD, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0	<	3.0		<	3.0		<	3.0		
MANGANESE, DISSOLVED	UG/L	<	5.0		<	5.0		<	5.0		4600			6000			440		
MERCURY, DISSOLVED	UG/L	<	0.20		<	0.20		<	0.20	<	0.20		<	0.20		<	0.20		
SELENIUM, DISSOLVED	UG/L	<	1.0	L		1.3	L		3.2	<	1.0	L	<	1.0	L		1.2	L	
SILVER, DISSOLVED	UG/L	<	1.0		<	1.0		<	1.0	<	1.0		<	1.0		<	1.0		
ZINC, DISSOLVED	UG/L	<	20		<	20		<	20	<	20		<	20			27		
•																			

BEGINN.	ING DAIL:	01-10M-A2
ENDING	DATE:	29-OCT-93

PARAMETER	UNITS		31R -SEP-93 93-012			52 - JUN-93 70-002			32 -SEP-93 93-016		01	32A - Jun-93 70-003		07	32A -SEP-93 93-017			35 - JUN-93 70-004	
COLOR, FIELD	-		CLEAR			CLEAR		_	CLEAR			CLEAR			CLEAR			L YLW/B	N
CONDUCTANCE, SPECIFIC	UMHOS/C	:M	480			300			330			610			1320			1070	
DEPTH TO WATER	FEET		14.44			3.37			6.22			3.59			6.46			10.10	
ODOR, FIELD			NONE			NONE			NONE			NONE			NONE			NONE	
PH, FIELD	SU		7.0			6.3			5.6			7.0			6.8			6.3	
TEMPERATURE	DEG C		15			13			14			13			14			12	
TURBIDITY, FIELD			MODERATE	E		SLIGHT			MODERAT	E		NONE			SLIGHT			SLIGHT	
WATER ELEVATION	FEET		607.97			610.80			607.95			610.81			607.94			610.66	
ALKALINITY AS CACO3	MG/L		190			140			140			330			320			190	
CHLORIDE	MG/L		11			6.7			6.9			7.0			7.6			110	
COD	MG/L																		
FLUORIDE	MG/L		0.18		<	0.10			0.12			0.12			0.19		<	0.10	
HARDNESS AS CACO3	MG/L		240			160			180			350			390			260	
NITROGEN, NITRATE + NITRITE	MG/L	<	0.050			0.68			1.2	•		1.1			1.3			36	
SOLIDS, TOTAL DISSOLVED	MG/L		340			200			240			380			420			800	
SULFATE	MG/L		71			11			16			29			30			35	
ARSENIC, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0		<	3.0		<	3.0			7.4	
BARIUM, DISSOLVED	UG/L		81			100			120			98			91			100	
BORON, DISSOLVED	UG/L		1100		<	200		<	200		<	200		<	200			210	
CADMIUM, DISSOLVED	UG/L		1.1		<	0.30			0.38		<	0.30			0.35		<	0.30	
CHROMIUM, DISSOLVED	UG/L	<	10		<	10		<	10		<	10		<	10		<	10	
COPPER, DISSOLVED	UG/L	<	20		<	20		<	20		<	20		<	20			21	
IRON, DISSOLVED	UG/L		210		<	100		<	100		<	100		<	100		<	100	
LEAD, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0		<	3.0		<	3.0		· <	3.0	
MANGANESE, DISSOLVED	UG/L		360		<	5.0			280			6.9			33		<	5.0	
MERCURY, DISSOLVED	UG/L	<	0.20		<	0.20		<	0.20		<	0.20		<	0.20		<	0.20	
SELENIUM, DISSOLVED	UG/L	<	1.0	L	<	1.0	L	<	1.0	L	<	1.0	L	<	1.0	L	<	1.0	L
SILVER, DISSOLVED	UG/L	<	1.0		<	1.0		<	1.0		<	1.0		<	1.0		<	1.0	
ZINC, DISSOLVED	UG/L	<	20		<	20		<	20		<	20		<	20		<	20	

BEGINNING DATE: 01-JUN-93

TABLE 8 GROUNDWATER CHEMISTRY

ENDING DATE:

29-0CT-93

PARAMETER	UNITS		35 -SEP-93 93-002		01	35A - Jun-93 70-005		07	35A -SEP-93 93-003			36 - Jun-93 70-007			36 -SEP-93 93-004		01	56A - Jun-93 70-006	
			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,																·
COLOR, FIELD			YELLOW			CLEAR			CLEAR			CLEAR			CLEAR			CLEAR	'
CONDUCTANCE, SPECIFIC	UMHOS/0	CM	1050			620			680			430			500			620	
DEPTH TO WATER	FEET		13.13			10.55			13.57			10.86			13.97			11.11	
ODOR, FIELD			NONE			NONE			NONE			NONE			NONE			NONE	
PH, FIELD	รบ		6.8			7.0			7.1			6.3			7.0			7.1	
TEMPERATURE	DEG C		14			13			12			12			13			13	
TURBIDITY, FIELD			SLIGHT			NONE			NONE			SLIGHT			MODERAT	E		NONE	
WATER ELEVATION	FEET		607.63			610.63			607.61			610.60			607.49			610.35	
ALKALINITY AS CACO3	MG/L		210			330			320			230			210			330	
CHLORIDE	MG/L		80			26			24			4.4			25			12	
COD	MG/L																		
FLUORIDE	MG/L		0.19		<	0.10			0.13		<	0.10			0.14		<	0.10	
HARDNESS AS CACO3	MG/L		290			380			400			240			280			350	
NITROGEN, NITRATE + NITRITE	MG/L		39			1.7			2.0		<	0.050			1.4			0.83	
SOLIDS, TOTAL DISSOLVED	MG/L		770			480			460			280			350			400	
SULFATE	MG/L		43			33			37			15			18			36	
ARSENIC, DISSOLVED	UG/L		3.6		<	3.0		<	3.0		<	3.0		<	3.0		<	3.0	
BARIUM, DISSOLVED	UG/L		120		<	50			54			110			120			68	
BORON, DISSOLVED	UG/L		220		<	200		<	200		<	200		<	200		<	200	
CADMIUM, DISSOLVED	UG/L	<	0.30		<	0.30		<	0.30		<	0.30		<	0.30		<	0.30	
CHROMIUM, DISSOLVED	UG/L	<	10		<	10		<	10		<	10		<	10		<	10	
COPPER, DISSOLVED	UG/L		24		<	20		<	20		<	20		<	20		<	20	
IRON, DISSOLVED	UG/L	<	100		<	100		<	1 00		<	100		<	100		<	100	
LEAD, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0		<	3.0		<	3.0		<	3.0	
MANGANESE, DISSOLVED	UG/L	<	5.0		<	5.0	•	<	5.0		<	5.0			55		<	5.0	
MERCURY, DISSOLVED	UG/L	<	0.20		<	0.20		<	0.20		<	0.20		<	0.20		<	0.20	
SELENIUM, DISSOLVED	UG/L	<	1.0	L	<	1.0	L	<	1.0	L		1.0	L		2.6	L	<	1.0	L
SILVER, DISSOLVED	UG/L	<	1.0		<	1.0		<	1.0	-	<	1.0	_	<	1.0	_	<	1.0	_
ZINC, DISSOLVED	UG/L	<	20		<	20		<	20		<	20		` <	20		<	20	

BEGINNING DATE: 01-JUN-93

ENDING DATE: 29-OCT-93							
		B-36A	B-37	B-37A	B-38	B-38	B-38A
		07-SEP-93	07-SEP-93	07-SEP-93	01-JUN-93	07-SEP-93	01-JUN-93
PARAMETER	UNITS	3293-005	3302-007	3302-008	1670-016	3293-006	1670-017
COLOR, FIELD		CLEAR	CLEAR	CLEAR	CLEAR	CLEAR	CLEAR
CONDUCTANCE, SPECIFIC	UMHOS/CM	620	510	770	3630	2830	2760
DEPTH TO WATER	FEET	14.18	8.13	8.14	18.53	20.19	24.87

PARAMETER	UNITS	329	3-005		33	02-007		33	02-008		16	70-016	329	93-006	167	70-017
COLOR, FIELD			CLEAR			CLEAR			CLEAR			CLEAR		CLEAR		CLEAR
CONDUCTANCE, SPECIFIC	UMHOS/CI	M	620			510			770			3630		2830		2760
DEPTH TO WATER	FEET		14.18			8.13			8.14			18.53		20.19		24.87
ODOR, FIELD			NONE			NONE			NONE			NONE		NONE		NONE
PH, FIELD	SU		7.1			7.3			7.3			8.3		9.9		7.7
TEMPERATURE	DEG C		11			13			11			20		20		15
TURBIDITY, FIELD			NONE			SLIGHT			NONE			NONE		SLIGHT		NONE
WATER ELEVATION	FEET		607.51			606.69			606.69			617.29		615.63		610.96
ALKALINITY AS CACO3	MG/L		330			200			190			100		420		80
CHLORIDE	MG/L		13			6.8			11			26		24		23
COO	MG/L												•			
FLUORIDE	MG/L		0.14		<	0.10		<	0.10			1.8		2.6		1.1
HARDNESS AS CACO3	MG/L		390			290			410			620		21		500
NITROGEN, NITRATE + NITRITE	MG/L		0.85			1.2		<	0.050			1.7		0.29		1.6
SOLIDS, TOTAL DISSOLVED	MG/L		420			380			590			3000		2200		2300
SULFATE	MG/L		36			100			240			2600		1200		2000
ARSENIC, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0			180		90		38
BARIUM, DISSOLVED	UG/L		68		<	50		<	50			110	<	50		58
BORON, DISSOLVED	UG/L	<	200			3100			7400			2500		2600		2200
CADMIUM, DISSOLVED	UG/L	<	0.30		<	0.30		<	0.30		<	0.30	<	0.30	<	0.30
CHROMIUM, DISSOLVED	UG/L	<	10		<	10		<	10			68	<	10		52
COPPER, DISSOLVED	UG/L	<	20		<	20		<	20		<	20	<	20	<	20
IRON, DISSOLVED	UG/L	<	100		<	100		<	100		<	100	<	100	<	100
LEAD, DISSOLVED	UG/L	<	3.0		<	3.0		<	3.0	•	<	3.0	<	3.0	<	3.0
MANGANESE, DISSOLVED	UG/L	<	5.0		<	5.0			55		<	5.0	<	5.0	<	5.0
MERCURY, DISSOLVED	UG/L	<	0.20		<	0.20		<	0.20		<	0.20	<	0.20	<	0.20
SELENIUM, DISSOLVED	UG/L	<	1.0	L	<	1.0	L	<	1.0	L		57		320		22
SILVER, DISSOLVED	UG/L	<	1.0		<	1.0		<	1.0		<	1.0	<	1.0	<	1.0
ZINC, DISSOLVED	UG/L	<	20		<	20		< ,	20		<	20	<	20	<	20

BEGINNING DATE: 01-JUN-93

ENDING DATE:

29-0CT-93

B-38A

07-SEP-93

PARAMETER

UNITS 3293-007

COLOR, FIELD			CLEAR
CONDUCTANCE, SPECIFIC	UMHOS/CM		3280
DEPTH TO WATER	FEET		27.59
ODOR, FIELD			NONE
PH, FIELD	SU		9.0
TEMPERATURE	DEG C		16
TURBIDITY, FIELD			NONE
WATER ELEVATION	FEET		608.24
ALKALINITY AS CACO3	MG/L		90
CHLORIDE	MG/L		21
COD	MG/L		
FLUORIDE	MG/L		3.4
HARDNESS AS CACO3	MG/L		390
NITROGEN, NITRATE + NITRITE	MG/L		0.59
SOLIDS, TOTAL DISSOLVED	MG/L		2600
SULFATE	MG/L		1800
ARSENIC, DISSOLVED	UG/L		51
BARIUM, DISSOLVED	UG/L		54
BORON, DISSOLVED	UG/L		3300
CADMIUM, DISSOLVED	UG/L <	:	0.30
CHROMIUM, DISSOLVED	UG/L		11
COPPER, DISSOLVED	UG/L <	:	20
IRON, DISSOLVED	UG/L <	:	100
LEAD, DISSOLVED	UG/L <	:	3.0
MANGANESE, DISSOLVED	UG/L <	:	5.0
MERCURY, DISSOLVED	UG/L <	:	0.20
SELENIUM, DISSOLVED	UG/L		57
SILVER, DISSOLVED	UG/L <	:	1.0
ZINC, DISSOLVED	UG/L <	:	20

Appendix C

2016 Low-Hazard Waste Exemption Leaching Test Results – Slag and Ash

Sediment and Soil Analytical Results - Water Leach Test Results WPL Nelson Dewey

Sample	Date	Depth (feet)	Material Type	Lab Notes	Boron (ug/L)	Chloride (mg/L)	Fluoride (mg/L)	Sulfate (mg/L)	TDS (mg/L)
WPDES POND	•	•			, 6,			, 0, ,	
SED-1	8/3/2016	0-1.3	Fly Ash		240	4.3	<1.0	4.4	54
SED-2	8/3/2016	0-1.0	Fly Ash		200	4.3	<1.0	11.5	60
QC-3 (SED-2)	8/3/2016	0-1	Fly Ash		240	3.5 J	<1.0	6.1	52
SED-3	7/20/2016	0-4.5	Slag		130	2.7 J	<1.0	5	28
	7/20/2016	4.5-5.5	SP		<50	2.5 J	<0.20	<2.0	14 J
SED-4	7/19/2016	0-4.8	ML		510	10.5 J	<10.0	11.9 J	86
	7/19/2016	4.8-5.5			74 J	NA	NA	NA	NA
GP-19	8/4/2016	8-12	SM		62 J	2.4 J	<1.0	2 J	16 J
SLAG POND		L				l.			L
SED-5	7/20/2016	0-1.6	ML-OL		54 J	3.2 J	<1.0	33.3	90
SED-6	7/20/2016	0-1.0	ML		60 J	3.7 J	0.36 J	59.1	130
SED-7	8/4/2016	0-3.0	Fly Ash		88 J	4	<1.0	10.5	76
SED-8	8/4/2016	1.0-1.5	Fly Ash		82 J	3.7 J	<1.0	12.1	74
COAL YARD									
TP-CY-1	7/19/2016	0-0.5	Coal		140	<20.0	<2.0	<20.0	32
	7/19/2016	3.0-3.5	SM		100 J	2.8 J	<1.0	<2.0	20
TP-CY-3	7/20/2016	1.9-2.1	GM		<50	3.9 J	<0.20	2.8 J	50
	7/20/2016	4.8-5.5	SM		NA	NA	NA	NA	NA
TP-CY-4	7/19/2016	0-2.8	Coal		190	<20.0	<2.0	<20.0	38
	7/19/2016	2.8-3.2	GP & SM		<50	<10.0	<1.0	<10.0	34
	7/19/2016	3.6-4.8	Slag		<50	<20.0	<2.0	<20.0	10 J
	7/19/2016	4.8-5.0			NA	NA	NA	NA	NA
TP-CY-6	7/19/2016	0-0.5	Coal		190	<20.0	<2.0	<20.0	54
	7/19/2016	0.7-1.0	SP		<50	2.5 J	<0.20	2.3 J	30
TP-CY-10	7/19/2016	0-0.5	Coal		120	2.4 J	<1.0	11.6	48
	7/19/2016	1.0-2.0	SM		<50	2.2 J	<1.0	2.3 J	28
TP-CY-12	7/20/2016	0-0.3	Coal		160	<20.0	<2.0	<20.0	44
	7/20/2016	0.3-2.0	SP		<50	2.2 J	<0.20	2.2 J	24
	7/20/2016	2.0-2.7	SP		<50	2.3 J	<0.20	27.5	50
QC-1 (TP-CY-12)	7/20/2016	0.3-2.0	SP		<50	2.6 J	<0.20	2.5 J	24
SLAG HANDLING AREA				<u> </u>					
GP-5	8/3/2016	12.5-15	Fly Ash		100	<2.0	<1.0	3.0 J	22
	8/3/2016	18-24	ML & SM		99 J	3.3 J	<1.0	<2.0	24
GP-7	8/3/2016	7.5-18	Slag		<50	2.2 J	<1.0	<2.0	<8.7
QC-2 (GP-7)	8/3/2016	7.5-18	Slag		<50	2.2 J	<1.0	<2.0	10 J
GP-14	8/4/2016	12.5-15	Fly Ash		120	<2.0	<1.0	13.4	96
SLAG SAMPLES ¹									
Slag 01 ²	6/3/2013		Slag		NA	NA	NA	NA	NA
Slag 01	12/23/2013		Slag		12.5 AB	0.277 B	NA	0.218	NA
NED Slag Composite 2014	7/1/2014		Slag		11.7 AB*^	< 0.142	NA	0.457 B	98 H
Slag Sample	4/14/2015		Slag		< 1020 A	0.751	NA	0.427	NA
	-								!

Sediment and Soil Analytical Results - Water Leach Test Results **WPL Nelson Dewey**

Sample	Date	Depth (feet)	Material Type	Lab Notes	Boron (ug/L)	Chloride (mg/L)	Fluoride (mg/L)	Sulfate (mg/L)	TDS (mg/L)
FLY ASH SAMPLES ¹									
NED Flyash Composite ²	2/14/2014		Fly Ash		NA	NA	NA	6,530 B	NA
Week of 062815 ²	7/3/2015		Fly Ash		NA	NA	NA	6,260	NA
Week of 010916	1/4/2016		Fly Ash		NA	NA	NA	NA	NA
NR 140 Preventative Action Limits (PA	Ls)				200	125	0.8	125	NE
NR 140 Enforcement Standards (ESs)					1000	250	4	250	NE
40 CFR Part 141.62 Maximum Contai	minant Levels (MCL)				NE	NE	4	NE	NE
NR 538 Table 1A Standards		•		190	125	0.8	125	NE	
NR 538 Table 2A Standards		•			1900	1,250	8	1,250	NE

Abbreviations:

mg/L = micrograms per literML = SiltML-OL = Silty Organic Clay NE = No Standard Established ML-CL = Silty Clay

SM = Silty SandSP = Poorly Graded Sand ML-OL = Silty Organic Clay

NA = Not Analyzed

GM = Silty Gravel GP = Poorly Graded Gravel TDS = Total Dissolved Solids

- 1. Slag and Fly Ash samples were collected by the plant as part of permit requirements.
- 2. Sample was analyzed using the SPLP Leach Method rather than the ASTM Water Leach Method for tested parameters except for Sulfate.
- NR 140 ESs Wisconsin Administrative Code (WAC), Chapter NR 140.10 Table 1 Public Health Groundwater Quality Standards from July 2015 and WAC, Chapter NR 140.12 Table 2 - Public Welfare Groundwater Quality Standards from July 2015.
- NR 140 PALs WAC, Chapter NR 140.10 Table 1 Public Health Groundwater Quality Standards from July 2015 and WAC, Chapter NR 140.12 Table 2 Public Welfare Groundwater Quality Standards from July 2015.

Laboratory Notes/Qualifiers:

- J = Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
- A = Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.
- ${\bf B}={\bf Compound}$ was found in the blank and sample.
- F1 = MS and/or MSD Recovery is outside acceptance limits.
- H = Sample was prepped or analyzed beyond the specified holding time.
- $^{\Lambda}$ = ICV, CCV, ICB, CCB, ISA, ISB, CRI, CRA, DLCK or MRL standard: Instrument related QC is outside acceptance limits.
- * = LCS or LCSD is outside acceptance limits.

Date: 3/1 4/2016 Created by: Last revision by: RJG Date: 10/24/2016 Checked by: BSS Date: 10/24/2016

Original table prepared for Slag Pond Closure Low Hazard Waste Exemption Request (SCS Project #25216054.00).

Reformatted for the Alternative Source Demonstration to include only the parameters with SSIs that were included in the leach testing by NDK, 9/14/2020; SCC 10/1/2021.

l:\25221071.00\Deliverables\2021 April ASD NED\Appendix C 2016 leachate results slag and ash\[Table 4. Sediment_Soil_Water Leach Results-Updated.xlsx]Leach Test - SSI Parameters