

# **CERTIFICATION REPORT CLOSURE BY REMOVAL GROUNDWATER**

## **UNIT 6 SCRUBBER BASINS DTE ELECTRIC COMPANY ST. CLAIR POWER PLANT EAST CHINA, MICHIGAN**

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## **EXECUTIVE SUMMARY**

The Unit 6 Scrubber Basins at the DTE Electric Company (DTE) St. Clair Power Plant (SCPP) were identified as inactive coal combustion residuals (CCR) management units under the United States Environmental Protection Agency (USEPA) CCR rule 40 Code of Federal Regulations (CRF) 257. To address the requirements of the CCR rule, DTE elected to complete closure by removal of the CCR material, thereby eliminating the CCR units. Physical removal of the CCR material is reported in the DTE St. Clair Power Plant Unit 6 Scrubber Basins Closure by Removal Certification Report dated December 2018.

Closure by removal also requires that "...groundwater monitoring concentrations do not exceed the groundwater protection standards pursuant to §257.95(h) for constituents listed in Appendix IV of this part" (the CCR rule). On behalf of DTE, AECOM Technical Services, Inc. (AECOM) established a groundwater monitoring system, conducted eight (8) baseline monitoring events, and evaluated the groundwater monitoring concentrations to determine whether this criterion was met.

The groundwater protection standards (GWPS) values are the greater of site-specific background concentrations, the drinking water maximum contaminant levels (MCLs), or the tap water regional screening levels (RSLs). All values met either the MCL or RSL as applicable, except for a limited number of lithium concentrations. These lithium concentrations then required an evaluation of site-specific background. AECOM evaluated background and identified multiple lines of evidence that lead to the conclusion that the observed lithium concentrations are representative of regional background lithium concentrations and are therefore equivalent to the GWPS.

Accordingly, the criteria for closure are met, the unit qualifies as removed (via clean closure), and no further action (including groundwater monitoring) is required to comply with the closure requirements of the CCR rule under 40 CFR §257.102(c).

## **1.0 INTRODUCTION**

At the request of DTE, AECOM prepared the following certification report to document achievement of the groundwater requirements of closure by removal for the Unit 6 Scrubber Basins site at the DTE SCPP, located in East China, Michigan (**Figure 1**). Closure by removal was conducted as directed by the USEPA's CCR rule 40 CFR §257.102(c), which specifies that:

*...CCR removal and decontamination of the CCR unit are complete when... groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to §257.95(h) for constituents listed in appendix IV to this part.*

Completion of closure by removal (of the unit and groundwater) eliminates the CCR unit and removes the obligation to conduct long-term monitoring of groundwater. This document presents summary details of the site background, groundwater conditions on site, and the lines of evidence supporting the determination of clean closure for groundwater, followed by a certification statement.

### **1.1 Site Location**

The SCPP is located in St. Clair County Michigan approximately 1 mile north of the city of East China, Michigan. The SCPP is a coal-fired and oil-fired electricity generating plant built in the 1950s. The SCPP facility is bounded to the east by the St. Clair River. Topography in the vicinity of the facility is relatively flat with an irregular grade from western "upland" areas ranging in elevation from 600 to 620 feet mean sea level (ft., msl), eastward toward the St. Clair River through elevations on the order of 580 to 595 ft., msl.

### **1.2 Description of the CCR Unit**

The SCPP Unit 6 Scrubber Basins are located approximately 2,600 feet west of the main plant and encompass an area approximately 15 acres in size (**Figure 1**). The two (2) Scrubber Basins were built in 1973 to handle flue gas desulfurization (FGD) scrubber material generated through the FGD process to remove sulfur compounds from the flue gas. Filling of the basins ceased in the mid-1970s. The basins are located adjacent to each other with their long axis oriented northeast to southwest. The eastern basin is approximately 1,300 feet in length with a maximum width of approximately 280 feet. The western basin is also approximately 1,300 feet in length and is approximately 190-feet wide. An earthen berm approximately 50-feet wide separates the two (2) basins. For purposes of the CCR groundwater evaluation, the two (2) basins were considered a combined CCR multiunit.

### **1.3 Unit Closure**

Removal of the CCR material from the unit is documented in the DTE SCPP Unit 6 Scrubber Basins Closure by Removal Certification Report dated December 2018. In order to complete closure by removal, the groundwater was tested to evaluate whether "groundwater monitoring concentrations do not exceed" (GWPS). GWPS values are the greater of site-specific background concentrations, the drinking water MCLs, or the tap water RSLs. Details of the characterization of groundwater conditions and the development of GWPS values are presented below.

## **2.0 GROUNDWATER EVALUATION**

As described in the Well Installation Report posted to the facility Operating Record April 17, 2019, seven (7) monitoring wells (BKG-1, BKG-2 and MW-1 through MW-5) were installed around the Unit 6 Scrubber Basins (**Figure 2**) to characterize groundwater conditions. All seven (7) wells encountered the first water-bearing zone in weathered bedrock/coarse till at the top of bedrock after drilling through over 125 feet of glacially compacted clay-rich till. All seven wells are hydraulically confined, with water levels rising to within 3.5 to 11 feet below ground surface (bgs). The water-bearing zone does not yield much water to

any of the seven (7) wells, but the wells were retained for testing, except for BKG-2 where the yield was insufficient for low-flow sampling criteria. Additional details regarding the monitoring well network are included in the Well Installation Report dated April 2019.

Boring logs for the monitoring wells are presented in **Appendix A**. As noted above, the CCR unit is underlain by a thick sequence of clay-rich glacial till overlying a weathered bedrock/coarse till zone in which limited amounts of groundwater are found under highly confined conditions. The clay-rich till is described as variously stiff-to-soft from the surface to a depth of over 125 feet. No desiccation cracks or other secondary porosity features were encountered in any of the drilled boreholes. These observations indicate that the clay unit immediately beneath the Unit 6 Scrubber Basins CCR unit provides a natural geologic barrier to infiltration of water from the surface. Water level data collected from these wells are presented herein on **Table 1**.

Between July 24, 2018 and February 21, 2019, eight (8) groundwater monitoring events were conducted to characterize groundwater quality in support of the closure by removal. The monitoring wells were tested for the analytes specified in Appendix III and Appendix IV of the CCR rule, as well as some additional ionic constituents. The results of these analyses are reported herein on **Table 2**.

### 3.0 GWPS EVALUATION

As noted in Section 1.3, GWPS values are the greater of three potential values:

- The drinking water MCLs per 40 CFR §141.62/66,
- The tap water RSLs for:
  - o Cobalt 0.006 milligrams per liter (mg/L)
  - o Lead 0.015 mg/L
  - o Lithium 0.040 mg/L
  - o Molybdenum 0.100 mg/L, or
- Site-specific background concentrations.

Over the course of eight events at the selected six (6) monitoring wells (48 samples in total), all Appendix IV constituent concentrations were less than their respective MCL or RSL except for lithium, for which there were nine (9) detections above the RSL of 0.040 mg/L. Lithium concentrations for the entire data set averaged 0.032 mg/L and ranged to a maximum of 0.055 mg/L. For comparison, the Michigan Part 201 Residential Drinking Water Criteria for lithium is 0.170 mg/L.

To evaluate whether these lithium values qualify as background concentrations, multiple lines of evidence were examined. Those lines of evidence include details of the geologic/hydrogeologic setting, the general chemistry of the groundwater (as it reflects the character of groundwater movement), and the regional evidence of lithium levels in groundwater.

#### 3.1 Geologic/Hydrogeologic Setting

The geologic and hydrogeologic setting of the site is described in Section 2 above. As noted, the dominant characteristic of the setting is the presence of over 125 feet of clayey till overlying the uppermost aquifer. The hydraulic characteristics of the till were not directly measured at the site for this evaluation. However, testing of the same till unit at the nearby Bottom Ash Basins on site indicated a vertical hydraulic conductivity on the order of  $2 \text{ to } 3 \times 10^{-8}$  centimeters per second (cm/s) (TRC, 2017). This low order of magnitude hydraulic conductivity indicates that the roughly 125 feet of clayey till represents a barrier that effectively prevents vertical movement of water. Therefore, this line of evidence strongly supports the position that the detected lithium concentrations represent a background condition.

As a second line of geologic evidence, the local bedrock is known from monitoring well logs and geologic maps of the area to consist of a gray marine shale<sup>1,2</sup>. Such bedrock materials are prone to yield brackish water when not effectively flushed by fresh water. The relatively stagnant groundwater becomes enriched in the ionic and metals constituents of the host rock. This is supported by field data presented on **Table 3**, which indicate that the oxygen reduction potential (ORP) of the sampled groundwater is dominated by negative values in all wells over the monitored period. This uniformly low ORP condition indicates the strong potential for metals to be reduced from a fixed/oxygenated state to a more mobile/reduced state, resulting in transfer from bedrock to groundwater.

### 3.2 Groundwater Chemistry

The CCR rule requires the monitoring of Appendix III constituents as indicators of CCR influence on groundwater quality. Inspection of these concentrations on **Table 2** provides two lines of evidence regarding the character of background groundwater.

First, the groundwater chemistry is consistent across the site, with the relative proportions of the basic ionic constituents varying only moderately between wells and between monitoring events. Second, the groundwater chemistry is salty, meaning that it is dominated by high concentrations of sodium and chloride with relatively low calcium, magnesium, and sulfate concentrations. The total dissolved solids (TDS) of the groundwater ranges from 2,520 to 4,000 mg/L, which qualifies as slightly brackish to moderately brackish<sup>3</sup>. In contrast, fresh groundwater resources (TDS less than 1,000 mg/L) tend toward an ionic chemistry dominated by calcium and bicarbonate, and CCR units tend to be dominated by calcium and sulfate with potential for magnesium and chloride components in some cases.

These general chemistry signatures can be visualized using an illustration referred to as a Piper diagram. In the Piper diagram, the relative dominance of each ion (represented in milliequivalents as opposed to weight/volume) in each sample can be illustrated graphically. Each sample occupies coordinates on separate ternary diagrams for cations and anions, and one quaternary plot combining both. The chemical signature evaluation relies on the conservation of mass in simple mixing of solutions having high-solubility ionic constituents. On this basis, groundwater that is mixed with CCR unit water will have a chemical signature that is intermediate between that of the unaffected groundwater and that of the unit. The more unit water that is mixed with groundwater, the more the plot of the resultant sample will move toward the plot of the unit water.

A Piper diagram illustrating the general chemistry of the monitoring wells is presented herein as **Figure 3**. The groundwater samples for six monitoring wells over the course of eight (8) monitoring events all plot within an extremely small sector of the diagram illustrating an overwhelming dominance of sodium and chloride over all other ions. The plot indicates that the chemistry of the groundwater is consistent across the site and over time, suggesting that the wells are all affected by the same factors despite their widely spaced locations (including the BKG-1 well located approximately 1,540 feet to the northwest of the unit).

Samples from a groundwater source that might better qualify as potable would show up in the lower left corners (calcium and bicarbonate) of the ternary diagrams as illustrated by the orange oval on **Figure 3** (EPRI, 2012). Samples of water from a CCR unit (no samples were collected because the CCR material was removed from the unit) might typically plot more toward the upper corner of the right ternary diagram (sulfate) and the lower left corner of the left ternary (calcium) as illustrated by the teal oval on **Figure 3** (EPRI, 2012).

<sup>1</sup> Milstein, Randall L. (compiler), 1987, Bedrock geology of southern Michigan: Geological Survey Division, Michigan Dept. of Natural Resources, scale: 1:500,000.

<sup>2</sup> <https://mrdata.usgs.gov>

<sup>3</sup> USGS, 2018. Saline Water Use in the United States (Available at <https://www.usgs.gov>)

The fact that the monitoring well data do not indicate any mixing with either bicarbonate waters or sulfate waters, is a clear indication that no surface infiltration has affected the monitored groundwater. Therefore, this line of evidence strongly supports the position that the detected lithium concentrations represent a background condition.

### **3.3 Regional Lithium Concentrations**

Three sources of regional groundwater quality data were evaluated to establish the regional distribution of lithium concentrations.

- DTE operates the nearby Range Road Landfill. Table 1 in Appendix C of the Range Road Landfill Groundwater Monitoring Report dated 2018 (TRC, 2019) references a 2007 study of private deep drinking water wells in China Township, Michigan that are believed to represent background groundwater quality. Well depths range from 115 to 130 feet deep and are located 2.20 to 4.10 miles west-northwest of the Unit 6 Scrubber Basins site. No geologic boring logs from these exact addresses are available, but public records of nearby logs indicate dominantly clay, sandstone and shale lithologies<sup>4</sup>. Lithium concentrations in this area ranged from 0.011 to 0.036 mg/L.
- Table 2 in Appendix A (Background Data) of the St. Clair Power Plant Bottom Ash Basins (SCPP BABs) Annual Groundwater Monitoring Report dated January 2018 (TRC, 2018) reports Appendix III and Appendix IV parameters for nine (9) sampling events from four (4) monitoring wells all screened in the uppermost aquifer. Lithium concentrations from four monitoring wells range between 0.033 to 0.130 mg/L. The Bottom Ash Basins are approximately 0.40 miles east of the Unit 6 Scrubber Basins. Similar to the Unit 6 Scrubber Basins, there is a horizontally expansive clay unit with substantial vertical thickness of 120 feet that isolates the uppermost aquifer from the SCPP BABs CCR unit. Low groundwater flow rates have also been observed at the Bottom Ash Basins.
- DTE also monitors groundwater quality at the nearby Belle River Power Plant. Table 2 in Appendix A (Background Data) of the Diversion Basin (BRPP DB) Annual Groundwater Monitoring Report dated January 2018 (TRC, 2018) reports Appendix III and Appendix IV parameters for nine sampling events from six monitoring wells all screened in the uppermost aquifer. Lithium concentrations from these six (6) wells range between 0.033 to 0.130 mg/L. The BRPP DB is approximately 0.90 miles west-northwest of the Unit 6 Scrubber Basins. Similar to the Unit 6 Scrubber Basins, there is a horizontally expansive clay unit with substantial vertical thickness of 130 feet that isolates the uppermost aquifer from the BRPP DB. Low groundwater flow rates have also been observed at the BRPP DB.

## **4.0 CONCLUSION**

Based on the lines of evidence presented above, the lithium values measured in the Unit 6 Scrubber Basins site groundwater monitoring system represent background conditions and therefore are adopted as the GWPS for purposes of evaluating closure in place. Accordingly, the criteria for closure are met, the unit qualifies as removed (via clean closure), and no further action (including groundwater monitoring) is required to comply with the closure requirements of the CCR rule under 40 CFR §257.102(c).

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<sup>4</sup> <https://www.michigan.gov/deq>

## 5.0 CERTIFICATION STATEMENT

### DTE UNIT 6 SCRUBBER BASINS CLOSURE ST. CLAIR, MICHIGAN

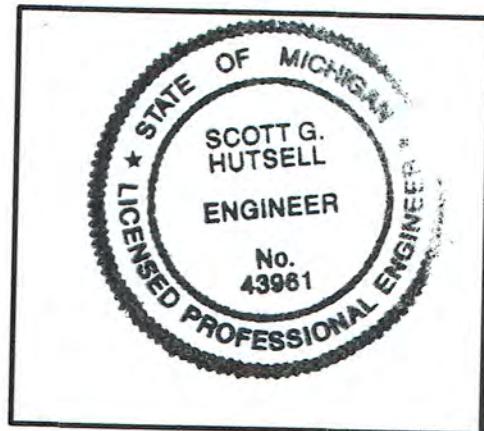
I, Scott G. Hutsell, P.E., being a Registered Professional Engineer in accordance with the Michigan Professional Engineer's Registration do hereby certify to my knowledge, information and belief, that the information contained in the accompanying report related to closure by removal of coal combustion residuals (CCR) from the Unit 6 Scrubber Basins at the St. Clair Power Plant is true and correct and has been prepared in accordance with the current industry standard of practice for the CCR removal.

Scott G. Hutsell  
Signature

05/17/2019  
Date

**Printed Name:**

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## **6.0 REFERENCES**

Electric Power Research Institute. (in preparation). Background groundwater quality data at coal-fired power plants and coal combustion management facilities. Electric Power Research Institute, Palo Alto, CA.

Electric Power Research Institute. 2006b. Characterization of field leachates at coal combustion product management sites: arsenic, selenium, chromium, and mercury speciation. Electric Power Research Institute, Palo Alto, CA, and the U.S. Department of Energy, Pittsburg, PA, Technical Report 1012578.

Electric Power Research Institute. 2012. Groundwater Quality Signatures for Assessing Potential Impacts from Coal Combustion Product Leachate. Electric Power Research Institute, Palo Alto, CA.

TRC. 2017. Groundwater Monitoring System Summary Report – DTE Electric Company St. Clair Power Plant Bottom Ash Basins Coal Combustion Residual Unit, 4901 Pointe Drive, East China Township, Michigan. Prepared for DTE Electric Company.

TRC. 2018. Annual Groundwater Monitoring Report - DTE Electric Company St. Clair Power Plant Bottom Ash Basins Coal Combustion Residual Unit, 4901 Pointe Drive, East China Township, Michigan. Prepared for DTE Electric Company. (<https://www.newlook.dteenergy.com/wps/wcm/connect/dte-web/home/community-and-news/common/environment/coal-combustion-residual>).

TRC. 2018. Annual Groundwater Monitoring Report – DTE Electric Company Belle River Power Plant Diversion Basin, 4505 King Road, China Township, Michigan. Prepared for DTE Electric Company. (<https://www.newlook.dteenergy.com/wps/wcm/connect/dte-web/home/community-and-news/common/environment/coal-combustion-residual>).

TRC. 2019. 2018 Annual Groundwater Monitoring Report - DTE Electric Company Range Road Coal Combustion Residual Landfill. 3600 Range Road, China Township, Michigan. Prepared for DTE Electric Company. (<https://www.newlook.dteenergy.com/wps/wcm/connect/dte-web/home/community-and-news/common/environment/coal-combustion-residual>).

## **TABLES**

**TABLE 1**  
**DTE ST. CLAIR**  
**INACTIVE SCRUBBER BASINS**  
**GROUNDWATER ELEVATIONS**

Well		Baseling Monitoring								
		Event 1		Event 2		Event 3		Event 4		
		Date	7/24/2018		8/23/2018		9/19/2018		10/17/2018	
		TOC Elevation (feet, msl)	DTW (feet)	Groundwater Elevation (feet, msl)						
BKG-1		590.02	9.56	580.46	9.37	580.65	9.41	580.61	9.01	581.01
MW-1		591.29	6.66	584.63	6.75	584.54	6.98	584.31	6.99	584.30
MW-2		589.94	5.04	584.90	5.31	584.63	5.60	584.34	5.46	584.48
MW-3		589.02	3.98	585.04	4.16	584.86	4.32	584.70	4.48	584.54
MW-4		589.16	4.41	584.75	4.24	584.92	4.50	584.66	4.80	584.36
MW-5		590.06	5.15	584.91	5.43	584.63	5.78	584.28	5.94	584.12

NM = Not measured

NA = Not applicable

TOC = Top of casing

DTW = Depth to water

msl = mean sea level

**TABLE 1**  
**DTE ST. CLAIR**  
**INACTIVE SCRUBBER BASINS**  
**GROUNDWATER ELEVATIONS**

Well		Baseling Monitoring								
		Event 5		Event 6		Event 7		Event 8		
		Date	11/13/2018		12/11/2018		1/8/2019		2/20/2019	
		TOC Elevation (feet, msl)	DTW (feet)	Groundwater Elevation (feet, msl)						
BKG-1		590.02	9.23	580.79	9.21	580.81	9.10	580.92	8.81	581.21
MW-1		591.29	7.28	584.01	7.12	584.17	6.16	585.13	5.38	585.91
MW-2		589.94	5.70	584.24	5.16	584.78	4.15	585.79	3.82	586.12
MW-3		589.02	3.96	585.06	3.63	585.39	2.78	586.24	3.16	585.86
MW-4		589.16	4.92	584.24	3.35	585.81	2.99	586.17	2.84	586.32
MW-5		590.06	6.06	584.00	5.12	584.94	4.68	585.38	4.81	585.25

NM = Not measured

NA = Not applicable

TOC = Top of casing

DTW = Depth to water

msl = mean sea level

**TABLE 2**  
**DTE ST. CLAIR**  
**INACTIVE SCRUBBER BASINS**  
**GROUNDWATER ANALYTICAL SUMMARY**

			Aquifer	Unconsolidated								
				Well ID	BKG-1							
					BKG-1-072518	BKG-1-082318	BKG-1-091918	BKG-1-101918	BKG-1-111418	BKG-1-121118	BKG-1-010919	BKG-1-022019
Lab Suite	Anayltical Constituent	U.S. EPA MCL	U.S. EPA Tap Water RSL	Date	7/25/2018	8/23/2018	9/19/2018	10/19/2018	11/14/2018	12/11/2018	1/9/2019	2/20/2019
CCR Appendix II	Boron (B)	NE	4.0	mg/L	1.73	1.74	1.74	1.76	1.83	1.85	1.87	1.69
	Calcium	NE	NE	mg/L	83.6	85.1	82.4	86.1	85.2	84.6	72.9	93.6
	Chloride	NE	NE	mg/L	1,950	2,330	2,100	2,100	2,080	2,900	2,090	1,990
	Fluoride (B)	4.0	8.0	mg/L	0.32	0.20	0.14	0.32	0.3	0.61	0.66	1.9
	Sulfate	NE	NE	mg/L	32.4	32.3	24.2	14.8	31.4	27.3	19.8	211
	Total Dissolved Solids (TDS)	NE	NE	mg/L	3,600	3,640	3,690	3,600	3,620	3,650	3,700	3,490
	pH	NE	NE	SU	7.56	7.45	7.39	7.29	7.29	7.48	7.78	7.44
CCR Appendix IV	Antimony	0.006	0.0078	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Arsenic	0.010	5.20E-05	mg/L	0.0062	0.0041	0.0030	0.0022	0.0027	0.0023	0.0021	0.0027
	Barium (B)	2.0	3.8	mg/L	0.392	0.385	0.386	0.336	0.376	0.359	0.339	0.349
	Beryllium	0.004	0.025	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
	Cadmium (B)	0.005	0.0092	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
	Chromium (B,H)	0.10	NE	mg/L	0.0054	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	0.0057
	Cobalt	NE	0.006	mg/L	0.0026	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Lead (B)	0.015	0.015	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Lithium (B)	NE	0.040	mg/L	0.0499	0.0400	0.0215	<0.0200	0.0283	0.0319	0.0240	0.0548
	Mercury (B, Z)	0.002	0.00063	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
	Molybdenum (B)	NE	0.10	mg/L	0.0255	0.0239	0.0206	0.0171	0.0232	0.0231	0.0180	0.0338
	Selenium (B)	0.050	0.10	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Thallium (B)	0.002	0.0002	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
General Chemistry	Magnesium	NE	NE	mg/L	24.5	23.4	22.8	23.0	23.0	22.7	20.2	34.6
	Potassium	NE	NE	mg/L	10.20	9.37	8.63	6.83	8.90	8.42	7.74	15.10
	Sodium	NE	NE	mg/L	1,230	1,150	1,230	1,180	1,260	1,270	1,310	1,190
	Alkalinity (Bicarbonate)	NE	NE	mg/L	178	181	197	197	185	184	186	177
Radium	Ra 226	NE	NE	pCi/L	1.94	1.75	2.28	1.91	2.01	1.50	5.19	1.50
	Ra 228	NE	NE	pCi/L	2.46	1.81	1.88	0.58	1.33	1.27	1.41	0.765
	Ra Total	NE	NE	pCi/L	4.40	3.56	4.16	2.49	3.34	2.77	0.109	2.27

**Notes:**

mg/L - milligrams per liter (equivalent to parts per million)

pCi/L = picoCuries per liter

RSL - Regional Screening Level

MCL - Maximum Contaminant Limit

NE - Value has not been established

TDS - Total dissolved solids

SU - Standard Units

**TABLE 2**  
**DTE ST. CLAIR**  
**INACTIVE SCRUBBER BASINS**  
**GROUNDWATER ANALYTICAL SUMMARY**

			Aquifer	Unconsolidated											
				Well ID	MW-1										
Lab Suite	Anayltical Constituent		U.S. EPA MCL	U.S. EPA Tap Water RSL	Date	7/25/2018	8/23/2018	9/20/2018	10/18/2018	11/13/2018	12/11/2018	12/11/2018	1/8/2019	1/8/2019	
CCR Appendix II	Boron (B)	NE	4.0	mg/L	1.86	1.80	1.88	1.78	1.88	1.93	1.93	1.85	1.86	1.93	1.88
	Calcium	NE	NE	mg/L	87.1	88.3	95.3	88.6	94.4	97.3	97.3	90.0	90.5	99.7	95.7
	Chloride	NE	NE	mg/L	2,100	2,600	2,190	2,390	2,270	2,470	2,470	2,030	2,370	2,640	2,320
	Fluoride (B)	4.0	8.0	mg/L	0.35	0.20	<0.10	<0.10	0.51	0.46	0.46	0.70	0.68	0.74	0.74
	Sulfate	NE	NE	mg/L	2.0	2.6	3.1	5.1	5.5	4.0	4.0	3.3	3.3	3.5	3.5
	Total Dissolved Solids (TDS)	NE	NE	mg/L	4,000	3,980	3,270	3,890	3,800	3,960	3,960	3,910	3,950	3,890	3,880
	pH	NE	NE	SU	7.54	7.43	7.42	7.44	7.23	7.31	7.31	7.39	7.39	7.46	7.46
CCR Appendix IV	Antimony	0.006	0.0078	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Arsenic	0.010	5.20E-05	mg/L	0.0017	0.0014	0.0011	0.0013	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	0.0012	0.0011
	Barium (B)	2.0	3.8	mg/L	0.512	0.486	0.507	0.462	0.489	0.467	0.458	0.464	0.472	0.495	0.496
	Beryllium	0.004	0.025	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
	Cadmium (B)	0.005	0.0092	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
	Chromium (B,H)	0.10	NE	mg/L	0.0028	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	0.0031	<0.0020
	Cobalt	NE	0.006	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Lead (B)	0.015	0.015	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Lithium (B)	NE	0.040	mg/L	0.0435	0.0392	0.0278	0.0286	0.0338	0.0301	0.0291	0.0252	0.0237	<0.0200	0.0214
	Mercury (B, Z)	0.002	0.00063	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
	Molybdenum (B)	NE	0.10	mg/L	0.0137	0.0126	0.0120	0.0115	0.0125	0.0132	0.0126	0.0125	0.0126	0.0125	0.0126
	Selenium (B)	0.050	0.10	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Thallium (B)	0.002	0.0002	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
General Chemistry	Magnesium	NE	NE	mg/L	26.7	26.5	28.6	26.9	28.3	28.4	29.0	28.2	28.4	29.1	28.6
	Potassium	NE	NE	mg/L	6.94	6.81	7.19	7.08	7.52	6.86	7.07	7.19	7.22	6.87	6.72
	Sodium	NE	NE	mg/L	1,320	1,220	1,300	1,260	1,320	1,340	1,360	1,330	1,330	1,310	1,320
	Alkalinity (Bicarbonate)	NE	NE	mg/L	154	156	162	163	164	161	162	166	159	168	168
Radium	Ra 226	NE	NE	pCi/L	2.47	0.790	1.89	1.03	0.750	1.05	1.62	0.995	0.560	0.836	1.94
	Ra 228	NE	NE	pCi/L	1.75	1.39	1.50	1.18	1.35	1.99	0.844	1.27	2.02	0.495	1.04
	Ra Total	NE	NE	pCi/L	4.22	2.18	3.39	2.21	2.10	3.04	2.46	2.27	2.58	1.33	2.98

**Notes:**

mg/L - milligrams per liter (equivalent to parts per million)

pCi/L = picoCuries per liter

RSL - Regional Screening Level

MCL - Maximum Contaminant Limit

NE - Value has not been established

TDS - Total dissolved solids

SU - Standard Units

**TABLE 2**  
**DTE ST. CLAIR**  
**INACTIVE SCRUBBER BASINS**  
**GROUNDWATER ANALYTICAL SUMMARY**

				Aquifer	Unconsolidated									
					Well ID	MW-2								
						MW-2-072418	MW-2-082218	MW-2-092018	MW-2-101918	MW-2-101918-D	MW-2-111318	MW-2-121118	MW-2-010819	MW-2-022019
Lab Suite	Anayltical Constituent	U.S. EPA MCL	U.S. EPA Tap Water RSL	Date	7/24/2018	8/22/2018	9/20/2018	10/19/2018	10/19/2018	11/13/2018	12/11/2018	1/8/2019	2/20/2019	
CCR Appendix II	Boron (B)	NE	4.0	mg/L	2.01	1.97	2.06	2.10	2.10	2.10	2.03	2.10	2.08	
	Calcium	NE	NE	mg/L	65.9	59.7	59.5	57.3	58.0	55.0	59.1	51.7	58.1	
	Chloride	NE	NE	mg/L	1,860	2,100	1,860	1,960	2,330	2,020	1,940	2,060	2,160	
	Fluoride (B)	4.0	8.0	mg/L	0.59	0.47	<0.10	0.64	0.65	0.66	0.60	0.88	0.81	
	Sulfate	NE	NE	mg/L	13.7	8.0	7.1	2.9	2.5	1.8	12.5	0.63	16.1	
	Total Dissolved Solids (TDS)	NE	NE	mg/L	3,160	3,320	3,970	3,330	3,400	3,310	3,290	3,380	3,310	
	pH	NE	NE	SU	7.82	7.72	7.59	7.45	7.45	7.55	7.79	7.73	7.68	
CCR Appendix IV	Antimony	0.006	0.0078	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	
	Arsenic	0.010	5.20E-05	mg/L	0.0034	0.0020	0.0018	0.0018	0.0015	0.0013	0.0020	0.0011	0.0021	
	Barium (B)	2.0	3.8	mg/L	0.362	0.325	0.313	0.266	0.267	0.278	0.295	0.265	0.299	
	Beryllium	0.004	0.025	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	
	Cadmium (B)	0.005	0.0092	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	
	Chromium (B,H)	0.10	NE	mg/L	0.0053	0.0021	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	0.0027	
	Cobalt	NE	0.006	mg/L	0.0020	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	
	Lead (B)	0.015	0.015	mg/L	0.0015	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	
	Lithium (B)	NE	0.040	mg/L	0.0490	0.0405	0.0378	0.0333	0.0351	0.0385	0.0406	0.0359	0.0440	
	Mercury (B, Z)	0.002	0.00063	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	
	Molybdenum (B)	NE	0.10	mg/L	0.0260	0.0216	0.0227	0.0186	0.0185	0.0199	0.0251	0.0195	0.0245	
General Chemistry	Selenium (B)	0.050	0.10	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	
	Thallium (B)	0.002	0.0002	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	
	Magnesium	NE	NE	mg/L	19.8	17.1	17.7	17.0	16.9	15.8	18.3	15.5	18.8	
	Potassium	NE	NE	mg/L	9.42	7.16	7.64	6.96	6.96	6.39	8.17	6.56	8.84	
Radium	Sodium	NE	NE	mg/L	1,150	1,160	1,160	1,150	1,140	1,160	1,150	1,210	1,190	
	Alkalinity (Bicarbonate)	NE	NE	mg/L	188	193	193	212	207	199	190	202	186	
	Ra 226	NE	NE	pCi/L	1.22	1.34	1.36	1.41	0.88	0.963	1.88	1.59	1.83	
	Ra 228	NE	NE	pCi/L	2.06	1.03	1.12	0.82	0.36	0.949	1.19	1.00	0.812	
	Ra Total	NE	NE	pCi/L	3.28	2.37	2.48	2.23	1.24	1.91	3.07	2.59	2.64	

**Notes:**

mg/L - milligrams per liter (equivalent to parts per million)

pCi/L = picoCuries per liter

RSL - Regional Screening Level

MCL - Maximum Contaminant Limit

NE - Value has not been established

TDS - Total dissolved solids

SU - Standard Units

**TABLE 2**  
**DTE ST. CLAIR**  
**INACTIVE SCRUBBER BASINS**  
**GROUNDWATER ANALYTICAL SUMMARY**

			Aquifer	Unconsolidated										
				Well ID	MW-3									
					MW-3-072418	MW-3-072418-D	MW-3-082218	MW-3-092018	MW-3-101918	MW-3-111318	MW-3-111318-D	MW-3-121218	MW-3-010819	MW-3-022019
Lab Suite	Anayltical Constituent	U.S. EPA MCL	U.S. EPA Tap Water RSL	Date	7/24/2018	7/24/2018	8/22/2018	9/20/2018	10/19/2018	11/13/2018	11/13/2018	12/12/2018	1/8/2019	2/20/2019
CCR Appendix II	Boron (B)	NE	4.0	mg/L	1.73	1.73	1.58	1.70	1.69	1.76	1.78	1.75	1.80	1.80
	Calcium	NE	NE	mg/L	61.5	61.7	55.8	62.2	62.4	61.9	62.9	60.4	60.2	66.2
	Chloride	NE	NE	mg/L	1,700	1,580	1,670	1,520	1,780	1,750	1,790	1,700	1,560	1,970
	Fluoride (B)	4.0	8.0	mg/L	0.73	0.72	0.67	<1.0	0.59	0.67	0.69	0.76	0.87	0.77
	Sulfate	NE	NE	mg/L	8.4	8.3	8.3	7.1	6.3	1.9	1.9	1.60	0.62	4.40
	Total Dissolved Solids (TDS)	NE	NE	mg/L	2,870	2,840	2,830	2,880	2,900	2,870	2,830	2,920	2,930	2,920
	pH	NE	NE	SU	7.62	7.62	7.59	7.47	7.41	7.42	7.42	7.55	7.65	7.58
CCR Appendix IV	Antimony	0.006	0.0078	mg/L	<0.0010	<0.0010	0.0013	0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Arsenic	0.010	5.20E-05	mg/L	0.0010	<0.0010	0.0038	0.0030	0.0026	0.0024	0.0023	0.0021	0.0019	0.0032
	Barium (B)	2.0	3.8	mg/L	0.058	0.058	0.290	0.289	0.247	0.265	0.263	0.237	0.254	0.270
	Beryllium	0.004	0.025	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	0.0002
	Cadmium (B)	0.005	0.0092	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
	Chromium (B,H)	0.10	NE	mg/L	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	0.0023	0.0033	0.0062
	Cobalt	NE	0.006	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	0.0010	<0.0010	<0.0010
	Lead (B)	0.015	0.015	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	0.0021
	Lithium (B)	NE	0.040	mg/L	0.0396	0.0391	0.0313	0.0255	0.0217	0.0233	0.0242	0.0215	0.0214	0.0314
	Mercury (B, Z)	0.002	0.00063	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
	Molybdenum (B)	NE	0.10	mg/L	0.0060	0.0061	0.0269	0.0270	0.0238	0.0235	0.0243	0.0246	0.0240	0.0257
	Selenium (B)	0.050	0.10	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Thallium (B)	0.002	0.0002	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
General Chemistry	Magnesium	NE	NE	mg/L	17.7	17.7	15.0	16.9	17.2	16.9	17.3	16.7	17.5	19.0
	Potassium	NE	NE	mg/L	6.18	6.22	5.08	5.45	5.44	5.25	5.32	5.24	5.46	6.94
	Sodium	NE	NE	mg/L	999	1,010	932	979	967	1,010	1,060	1,060	1,060	993
	Alkalinity (Bicarbonate)	NE	NE	mg/L	167	168	170	173	182	188	186	195	186	192
Radium	Ra 226	NE	NE	pCi/L	1.21	1.32	1.39	1.39	1.00	0.933	0.845	0.909	1.02	0.372
	Ra 228	NE	NE	pCi/L	1.53	3.07	1.18	1.83	0.34	0.901	1.10	0.866	1.26	0.570
	Ra Total	NE	NE	pCi/L	2.74	4.39	2.57	3.22	1.34	1.83	1.95	1.78	2.28	0.942

**Notes:**

mg/L - milligrams per liter (equivalent to parts per million)

pCi/L = picoCuries per liter

RSL - Regional Screening Level

MCL - Maximum Contaminant Limit

NE - Value has not been established

TDS - Total dissolved solids

SU - Standard Units

**TABLE 2**  
**DTE ST. CLAIR**  
**INACTIVE SCRUBBER BASINS**  
**GROUNDWATER ANALYTICAL SUMMARY**

			Aquifer	Unconsolidated										
				Well ID	MW-4									
					MW-4-072418	MW-4-082218	MW-4-082218-D	MW-4-091918	MW-4-101718	MW-4-111418	MW-4-121218	MW-4-010819	MW-4-022119	
Lab Suite	Anayltical Constituent	U.S. EPA MCL	U.S. EPA Tap Water RSL	Date	7/24/2018	8/22/2018	8/22/2018	9/19/2018	10/17/2018	11/14/2018	12/12/2018	1/8/2019	2/21/2019	
CCR Appendix II	Boron (B)	NE	4.0	mg/L	1.68	1.62	1.54	1.59	1.58	1.53	1.71	1.67	1.78	
	Calcium	NE	NE	mg/L	67.0	54.0	51.3	51.2	51.9	54.1	65.3	58.6	67.2	
	Chloride	NE	NE	mg/L	1,440	1,540	1,560	1,430	1,520	1,360	1,650	1,670	1,870	
	Fluoride (B)	4.0	8.0	mg/L	0.94	0.95	0.92	0.96	0.35	0.86	1.00	1.10	1.20	
	Sulfate	NE	NE	mg/L	7.1	7.0	7.1	5.8	8.8	6.5	3.1	6.6	7.9	
	Total Dissolved Solids (TDS)	NE	NE	mg/L	2,530	2,550	2,530	2,610	2,520	2,640	2,760	2,730	2,740	
	pH	NE	NE	SU	7.87	7.76	7.76	7.79	7.80	7.60	7.83	7.85	7.88	
CCR Appendix IV	Antimony	0.006	0.0078	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	
	Arsenic	0.010	5.20E-05	mg/L	<0.0010	0.0019	0.0017	0.0014	0.0014	0.0019	0.0027	0.0018	0.0026	
	Barium (B)	2.0	3.8	mg/L	0.060	0.269	0.271	0.262	0.238	0.265	0.278	0.269	0.294	
	Beryllium	0.004	0.025	mg/L	<0.0002	0.0003	0.0003	<0.0002	<0.0002	0.0002	0.0004	0.0002	0.0003	
	Cadmium (B)	0.005	0.0092	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	
	Chromium (B,H)	0.10	NE	mg/L	0.0032	0.0076	0.0067	0.0038	0.0033	0.0059	0.0094	0.0067	0.0091	
	Cobalt	NE	0.006	mg/L	0.0012	0.0022	0.0022	0.0013	0.0012	0.0025	0.0037	0.0021	0.0032	
	Lead (B)	0.015	0.015	mg/L	<0.0010	0.0019	0.0018	0.0010	<0.0010	0.0022	0.0037	0.0023	0.0029	
	Lithium (B)	NE	0.040	mg/L	0.0477	0.0314	0.0285	0.0232	0.0239	0.0248	0.0340	0.0246	0.0371	
	Mercury (B, Z)	0.002	0.00063	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	
	Molybdenum (B)	NE	0.10	mg/L	0.0053	0.0220	0.0223	0.0226	0.0224	0.0231	0.0235	0.0226	0.0218	
	Selenium (B)	0.050	0.10	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	
	Thallium (B)	0.002	0.0002	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	
General Chemistry	Magnesium	NE	NE	mg/L	23.1	16.6	15.8	16.1	16.7	15.2	22.2	19.7	23.0	
	Potassium	NE	NE	mg/L	9.12	6.62	6.18	5.54	5.78	4.93	7.09	6.96	8.59	
	Sodium	NE	NE	mg/L	918	902	846	917	830	910	975	942	969	
	Alkalinity (Bicarbonate)	NE	NE	mg/L	173	163	162	161	156	183	170	162	188	
Radium	Ra 226	NE	NE	pCi/L	1.49	0.441	1.06	0.836	0.386	0.727	0.533	0.848	0.505	
	Ra 228	NE	NE	pCi/L	1.63	1.37	1.15	1.50	1.45	1.11	0.618	1.37	0.749	
	Ra Total	NE	NE	pCi/L	3.12	1.81	2.21	2.34	1.84	1.84	1.15	2.22	1.25	

**Notes:**

mg/L - milligrams per liter (equivalent to parts per million)

pCi/L = picoCuries per liter

RSL - Regional Screening Level

MCL - Maximum Contaminant Limit

NE - Value has not been established

TDS - Total dissolved solids

SU - Standard Units

**TABLE 2**  
**DTE ST. CLAIR**  
**INACTIVE SCRUBBER BASINS**  
**GROUNDWATER ANALYTICAL SUMMARY**

			Aquifer	Unconsolidated									
			Well ID	MW-5									
				MW-5-072418	MW-5-082218	MW-5-091918	MW-5-091918-D	MW-5-102218	MW-5-111318	MW-5-121218	MW-5-010919	MW-5-22119	
Lab Suite	Anayltical Constituent	U.S. EPA MCL	U.S. EPA Tap Water RSL	Date	7/24/2018	8/22/2018	9/19/2018	9/19/2018	10/22/2018	11/13/2018	12/12/2018	1/9/2019	2/21/2019
CCR Appendix II	Boron (B)	NE	4.0	mg/L	1.74	1.60	1.62	1.64	1.74	1.70	1.83	1.77	1.76
	Calcium	NE	NE	mg/L	76.0	68.7	67.2	68.4	67.8	68.2	64.8	65.3	75.7
	Chloride	NE	NE	mg/L	1,740	2,000	1,880	1,840	2,030	2,000	1,920	2,000	2,030
	Fluoride (B)	4.0	8.0	mg/L	0.44	0.30	0.24	0.25	0.52	0.55	0.72	0.77	0.74
	Sulfate	NE	NE	mg/L	6.7	1.5	3.0	3.7	0.50	3.0	0.31	<0.25	11.00
	Total Dissolved Solids (TDS)	NE	NE	mg/L	3,260	3,330	3,280	3,270	3,270	3,220	3,270	3,300	3,200
	pH	NE	NE	SU	7.50	7.34	7.38	7.38	7.36	7.39	7.54	7.73	7.55
CCR Appendix IV	Antimony	0.006	0.0078	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Arsenic	0.010	5.20E-05	mg/L	<0.0010	<0.0010	0.0010	<0.0010	0.0010	0.0011	<0.0010	<0.0010	0.0010
	Barium (B)	2.0	3.8	mg/L	0.076	0.337	0.318	0.327	0.315	0.323	0.284	0.280	0.335
	Beryllium	0.004	0.025	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
	Cadmium (B)	0.005	0.0092	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
	Chromium (B,H)	0.10	NE	mg/L	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	0.0040
	Cobalt	NE	0.006	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Lead (B)	0.015	0.015	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Lithium (B)	NE	0.040	mg/L	0.0437	0.0288	0.0228	0.0233	0.0260	0.0317	0.0291	0.0284	0.0342
	Mercury (B, Z)	0.002	0.00063	mg/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
	Molybdenum (B)	NE	0.10	mg/L	0.0038	0.0142	0.0148	0.0148	0.0161	0.0172	0.0168	0.0158	0.0175
	Selenium (B)	0.050	0.10	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
	Thallium (B)	0.002	0.0002	mg/L	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
General Chemistry	Magnesium	NE	NE	mg/L	21.7	18.5	19.1	19.6	19.3	19.2	18.5	19.2	20.8
	Potassium	NE	NE	mg/L	7.49	5.86	5.90	6.11	5.77	6.26	5.61	6.06	7.05
	Sodium	NE	NE	mg/L	1,130	1,020	1,100	1,100	1,100	1,110	1,170	1,150	1,120
	Alkalinity (Bicarbonate)	NE	NE	mg/L	160	173	178	174	181	175	185	176	173
Radium	Ra 226	NE	NE	pCi/L	1.03	1.42	0.772	1.05	0.583	0.649	0.722	0.945	0.733
	Ra 228	NE	NE	pCi/L	1.50	1.81	1.92	1.87	0.639	0.702	1.39	1.33	0.852
	Ra Total	NE	NE	pCi/L	2.53	3.23	2.69	2.92	1.22	1.35	2.11	2.28	1.59

**Notes:**

mg/L - milligrams per liter (equivalent to parts per million)

pCi/L = picoCuries per liter

RSL - Regional Screening Level

MCL - Maximum Contaminant Limit

NE - Value has not been established

TDS - Total dissolved solids

SU - Standard Units

**TABLE 3**  
**DTE ST. CLAIR**  
**INACTIVE SCRUBBER BASINS**  
**FIELD PARAMETERS**

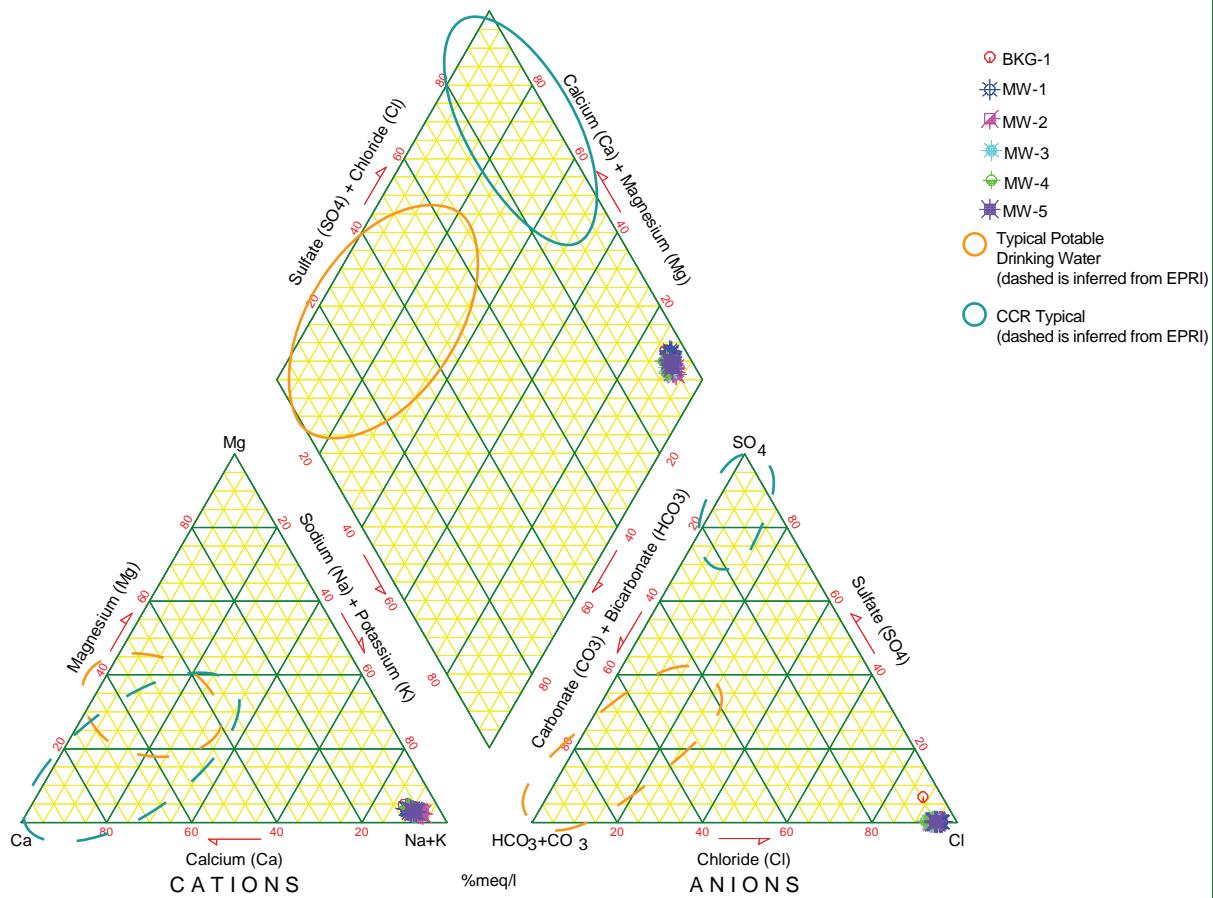
Well ID	Date	Depth to Water Pre-purge (feet, BTOC)	Final DTW Reading Purge completion (feet, BTOC)	Flow (mL/min)	Temp (Celsius)	Specific Conductivity (uS/cm)	pH (Standard Units)	Oxidation Reduction Potential (ORP) (mv)	Turbidity (NTUs)
MW-1	7/25/2018	6.69	15.35	100	14.3	7370	7.54	-102.7	86
	8/23/2018	6.75	14.93	100	14.1	7363	7.43	-84.1	53
	9/20/2018	7.04	20.25	100	13.1	7087	7.42	19.4	25
	10/18/2018	7.04	13.92	100	11.9	7421	7.44	-121.1	167
	11/13/2018	7.28	7.97	150	10.7	6898	7.23	-94.7	47
	12/11/2018	7.12	9.08	150	10.6	6768	7.31	-38.3	16
	1/8/2019	6.16	12.51	100	10.8	6770	7.39	132.0	9
MW-2	7/24/2018	5.04	12.01	100	16.2	6179	7.82	-103.7	145
	8/22/2018	5.31	15.34	100	14.1	6312	7.72	-112.2	54
	9/20/2018	5.64	15.66	100	13.9	6196	7.59	13.5	25
	10/19/2018	5.55	13.14	200	12.6	6541	7.45	-152.6	94
	11/13/2018	5.70	7.09	100	10.6	6106	7.55	-138.8	41
	12/11/2018	5.16	9.76	150	10.6	5819	7.79	-83.8	20
	1/8/2019	4.15	12.77	150	10.9	6039	7.73	63.7	34
MW-3	7/24/2018	3.98	14.00	100	15.5	5435	7.62	-72.7	110
	8/22/2018	4.16	14.00	100	14.9	5430	7.59	-56.3	71
	9/20/2018	4.36	12.75	100	14.2	5314	7.47	139.5	18
	10/18/2018	4.73	21.50	200	11.9	5591	7.41	-95.5	36
	11/13/2018	3.96	7.96	150	10.6	5283	7.42	-108.7	58
	12/12/2018	3.63	13.09	150	10.2	5674	7.55	-73.1	63
	1/8/2019	2.78	10.92	100	10.4	5215	7.65	45.3	59
MW-4	7/24/2018	4.41	7.40	100	16.3	4925	7.87	-109.1	540
	8/22/2018	4.24	6.65	100	15.5	5041	7.76	-100.6	426
	9/19/2018	4.50	6.58	100	15.6	4832	7.79	106.3	285
	10/17/2018	4.80	6.75	100	12.9	5013	7.80	-137.8	153
	11/14/2018	4.92	3.93	200	11.2	4999	7.60	-107.3	163
	12/12/2018	3.35	6.75	100-150	10.7	5322	7.83	-83.3	251
	1/8/2019	2.99	4.79	100	10.6	4785	7.85	42.3	350
MW-5	7/24/2018	2.84	6.37	150	10.0	5152	7.88	43.9	241
	8/22/2018	5.15	16.70	100	13.6	6065	7.50	-85.2	27
	9/19/2018	5.43	15.66	100	14.2	6181	7.34	-64.7	25
	10/22/2018	5.78	13.02	100	14.7	6083	7.38	59.4	22
	11/13/2018	5.94	14.60	150	12.9	6381	7.36	-130.6	34
	12/12/2018	6.06	11.89	100	10.9	5942	7.39	-117.6	25
	1/8/2019	5.12	5.58	100-150	10.4	6315	7.54	-68.5	22
BKG-1	7/25/2018	4.68	9.60	100	10.0	6501	7.73	142.7	25
	8/23/2018	4.81	14.93	200	10.5	6068	7.55	35.6	9
	9/19/2018	9.60	14.71	100	15.7	6721	7.56	-93.1	210
	10/19/2018	9.37	13.42	100	16.8	6775	7.45	-83.6	194
	11/14/2018	9.41	17.82	100	13.7	6591	7.39	125.9	221
	12/11/2018	9.08	14.97	150	12.1	6933	7.29	-111.5	76
	1/9/2019	9.23	9.08	200	10.3	6774	7.29	-91.3	23
<b>Units:</b> BTOC = Below top of casing mL/min = milliliters per minute (uS/cm) = micro Siemens per centimeter mv = millivolts NTUs = nephelometric turbidity units									

## **FIGURES**





Figure 3  
DTE St. Clair Events 1-8



**APPENDIX A**  
**BORING LOGS**

**Project: DTE-CCR Groundwater Investigation**

Project Location: DTE St. Clair

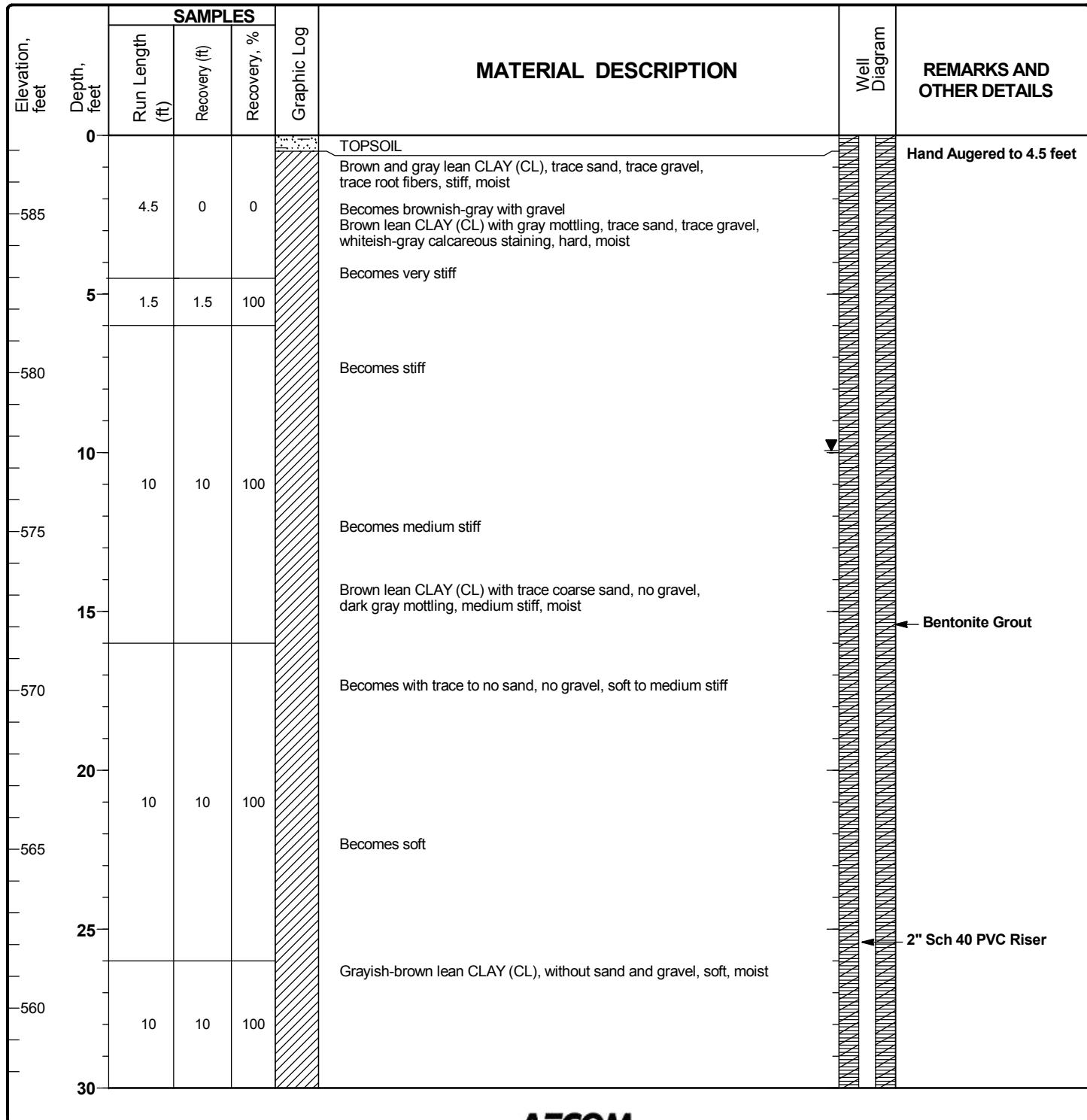
Project Number: 6056402.3

**Log of**

**BKG-1**

Sheet 1 of 5

Date(s) Drilled	5/22/2018 to 5/23/2018	Logged By	T. George	Checked By	WBL
Drilling Method	Sonic	Drill Bit Size/Type	6" OD casing	Total Depth of Borehole	141 ft
Drill Rig Type	ProSonic 600	Drilling Contractor	Cascade	Surface Elevation	587.48 ft msl
Borehole Backfill	Monitoring Well	Sampling Method(s)	Sonic	Top of Casing Elevation	590.02 ft msl
Boring Location	467758.47, 13627846.63	Groundwater Level(s)	9.94 ft. measured 06/25/2018		



## Project: DTE-CCR Groundwater Investigation

Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

BKG-1

Sheet 2 of 5

Elevation, feet	Depth, feet	SAMPLES			Graphic Log	MATERIAL DESCRIPTION		REMARKS AND OTHER DETAILS
		Run Length (ft)	Recovery (ft)	Recovery, %				
30								
-555	10	10	100					
35								
-550	10	10	100					
40								
-545	10	10	100					
45								
-540	10	10	100					
50								
-535	10	10	100					
55								
-530	10	10	100					
60								
-525	10	10	100					
65								

Grayish-brown lean CLAY (CL), trace to no sand, no gravel, soft, moist

Becomes with trace bluish-gray

Brownish-gray lean CLAY (CL), trace sand, trace gravel, medium stiff, moist (glacial till)

2" Sch 40 PVC Riser

Bentonite Grout

## Project: DTE-CCR Groundwater Investigation

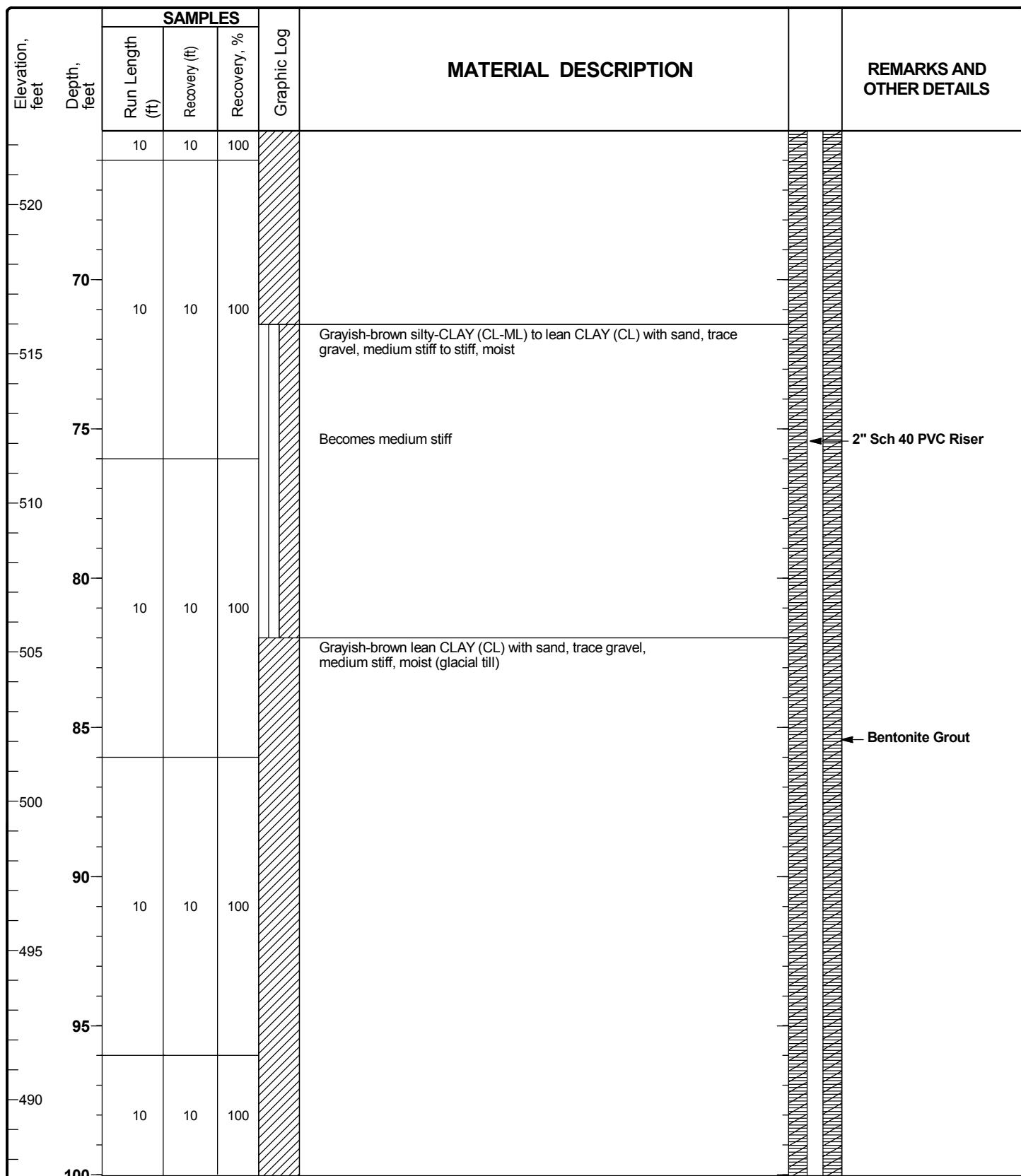
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

## BKG-1

Sheet 3 of 5



## Project: DTE-CCR Groundwater Investigation

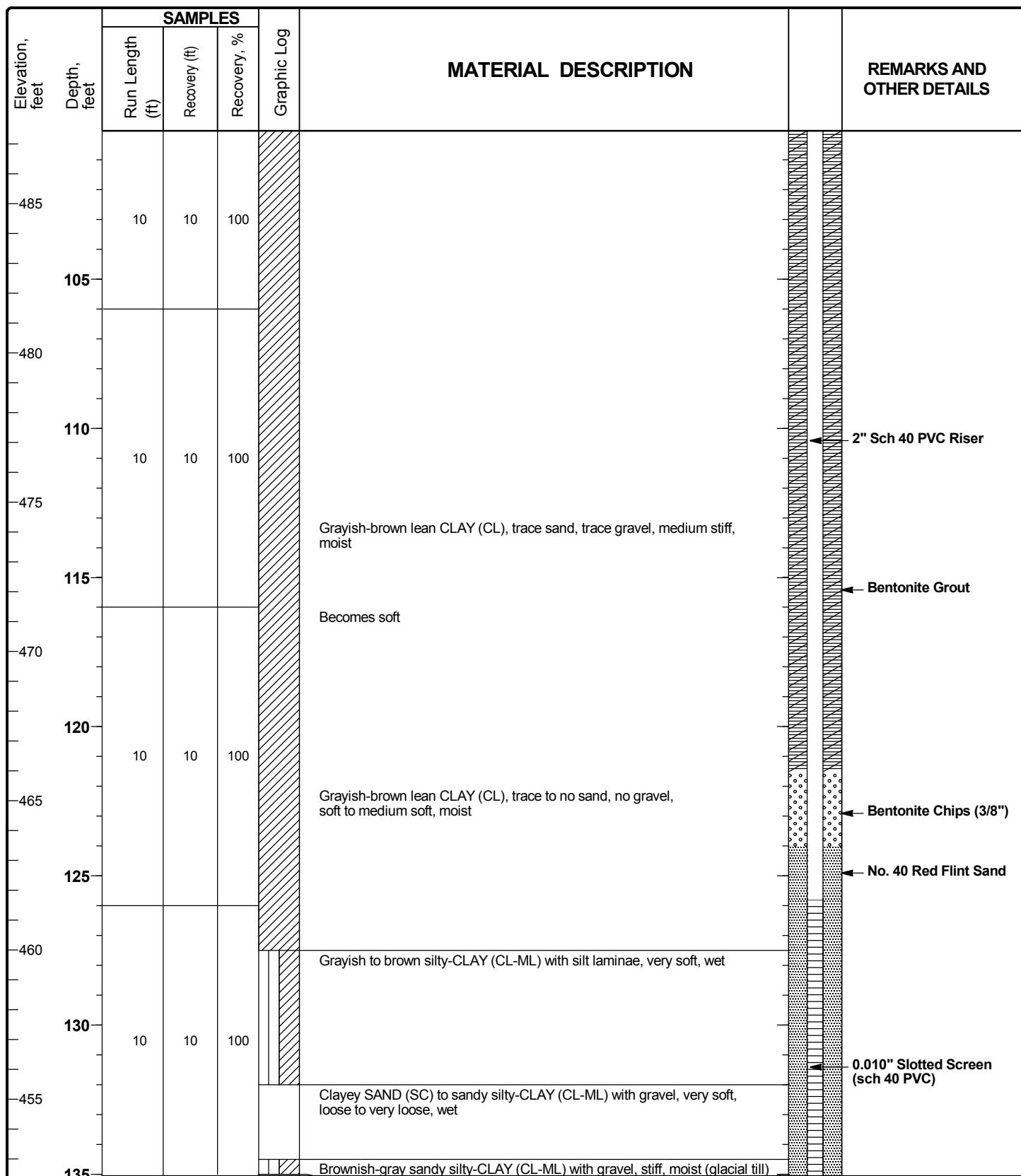
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

BKG-1

Sheet 4 of 5



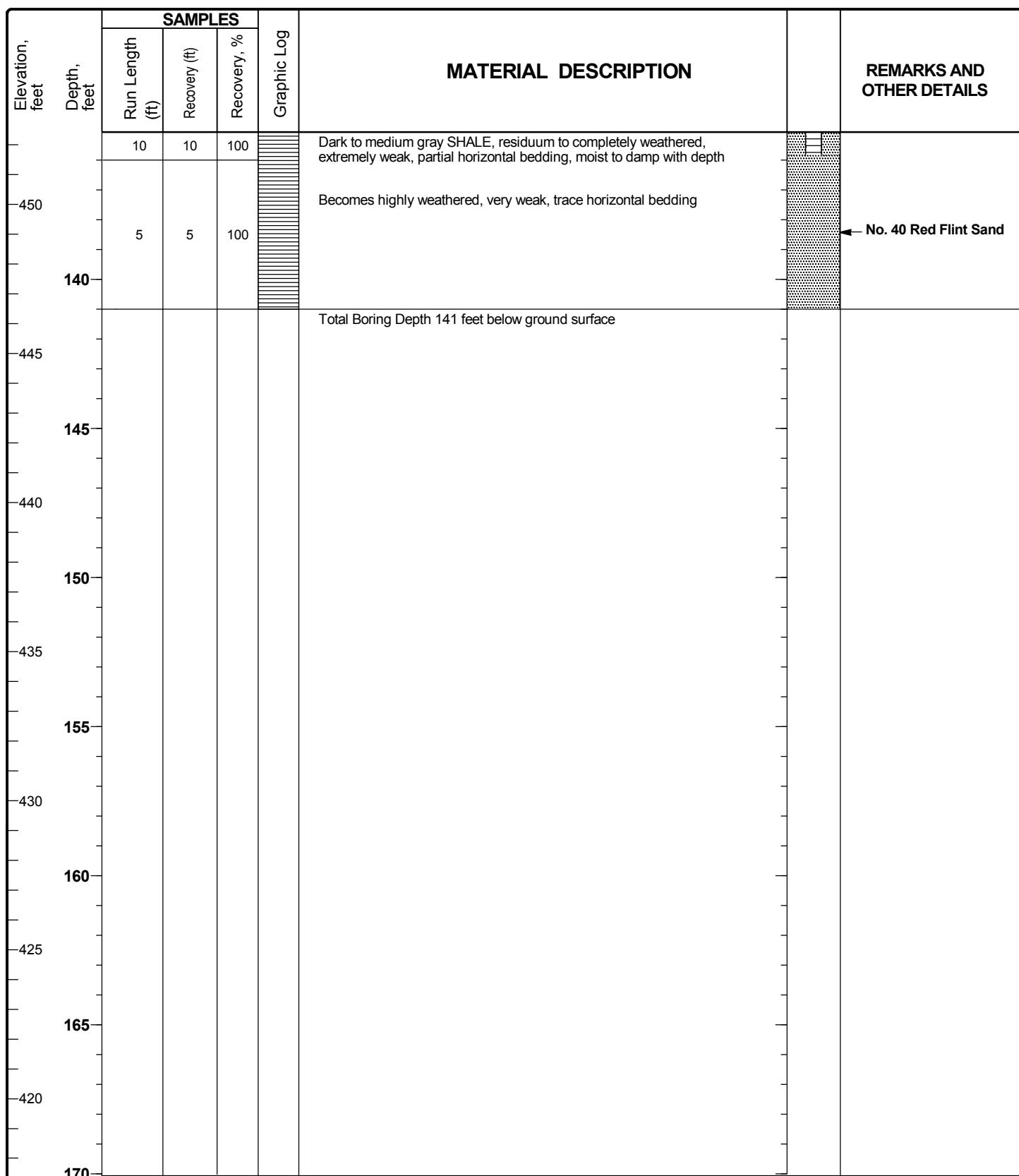
## Project: DTE-CCR Groundwater Investigation

Project Location: DTE St. Clair

Project Number: 6056402.3

Log of  
BKG-1

Sheet 5 of 5



**Project: DTE-CCR Groundwater Investigation**

Project Location: DTE St. Clair

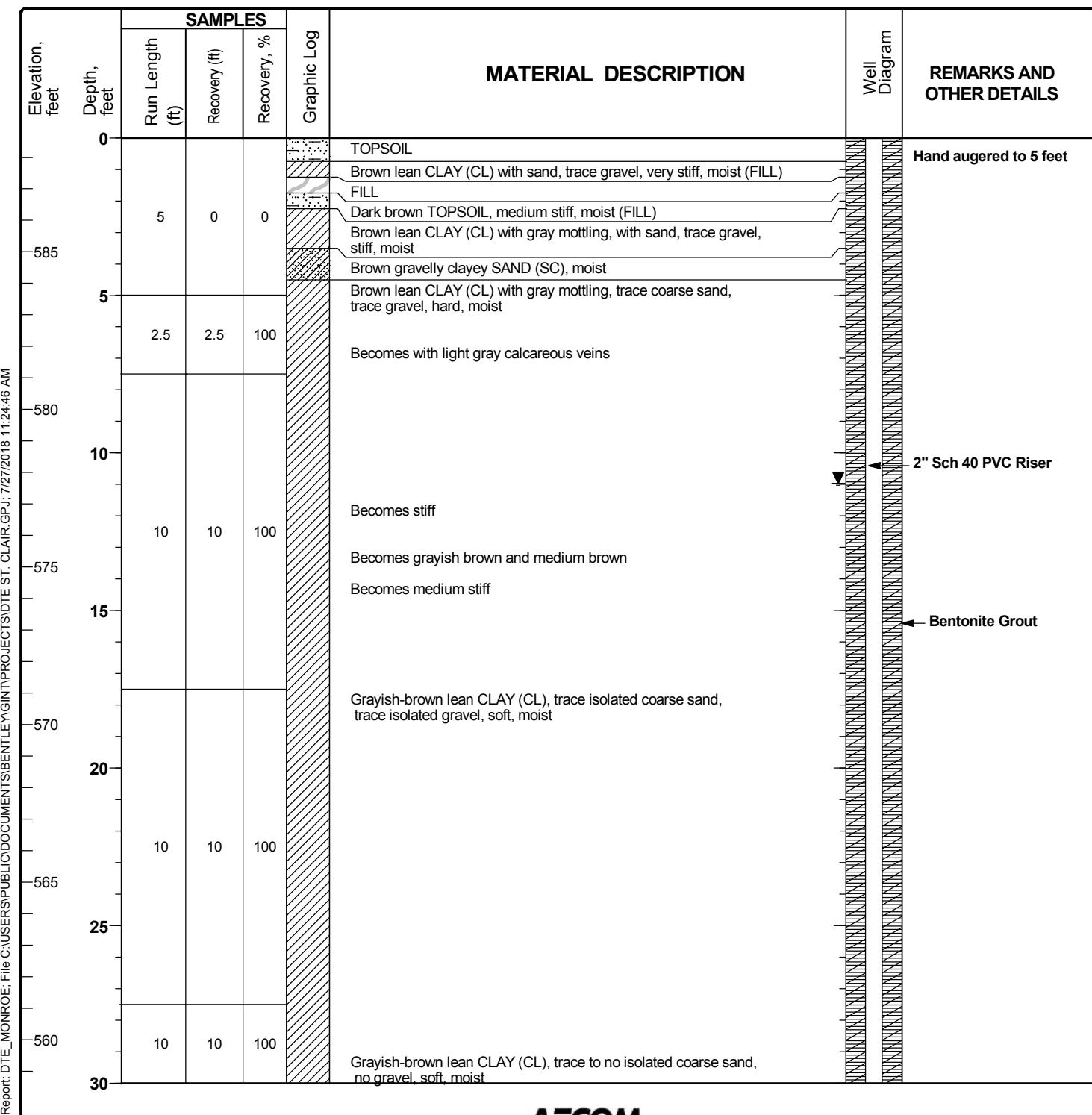
Project Number: 6056402.3

**Log of**

**BKG-2**

Sheet 1 of 5

Date(s) Drilled	06/05/2018 to 6/5/2018	Logged By	T. George	Checked By	WBL
Drilling Method	Sonic	Drill Bit Size/Type	6" OD casing	Total Depth of Borehole	145 ft
Drill Rig Type	ProSonic 600	Drilling Contractor	Cascade	Surface Elevation	588.62 ft msl
Borehole Backfill	Monitoring Well	Sampling Method(s)	Sonic	Top of Casing Elevation	591.31 ft msl
Boring Location	467523.50, 13627689.14	Groundwater Level(s)	10.96 ft. measured 06/25/2018		



## Project: DTE-CCR Groundwater Investigation

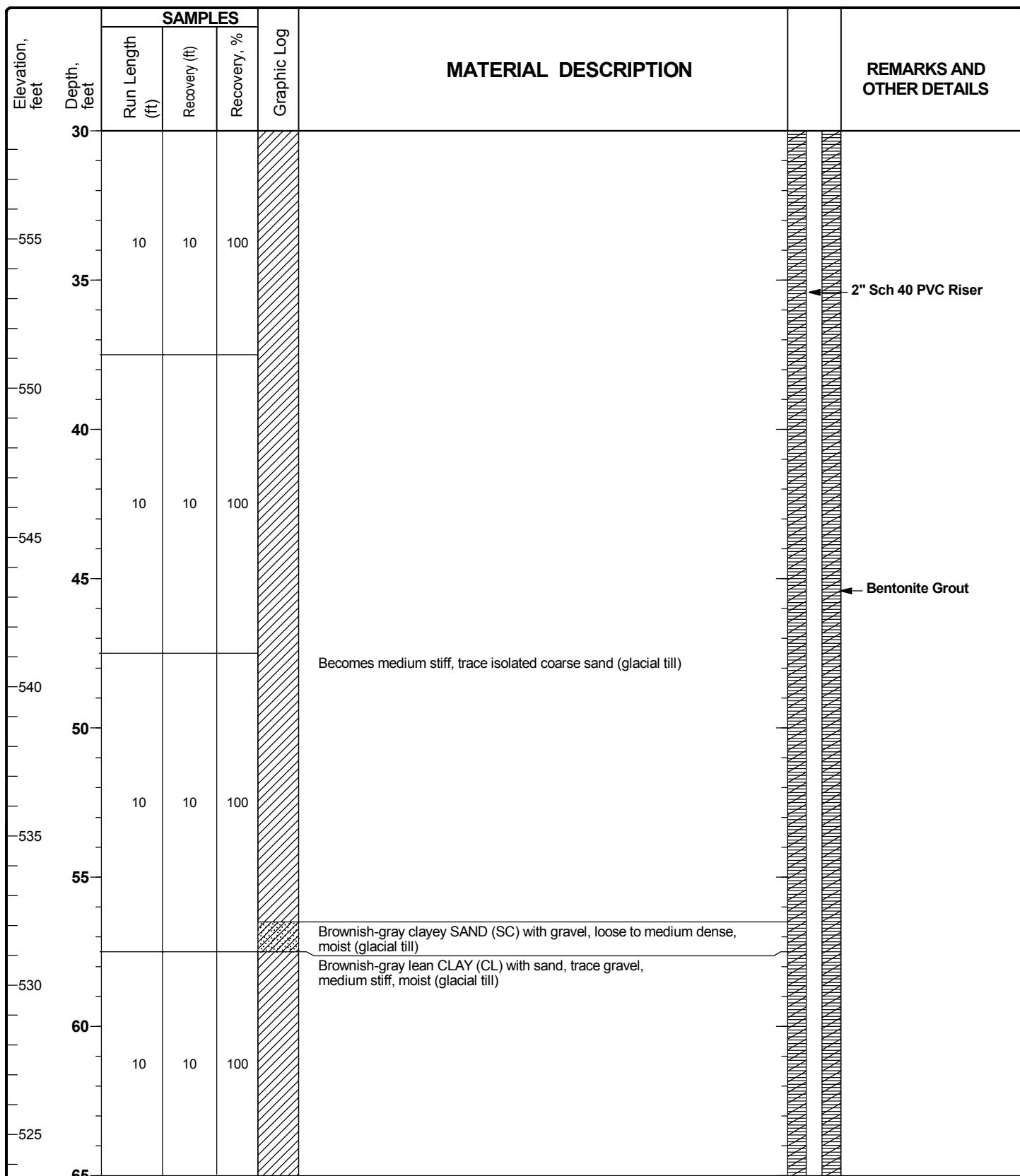
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

BKG-2

Sheet 2 of 5



## Project: DTE-CCR Groundwater Investigation

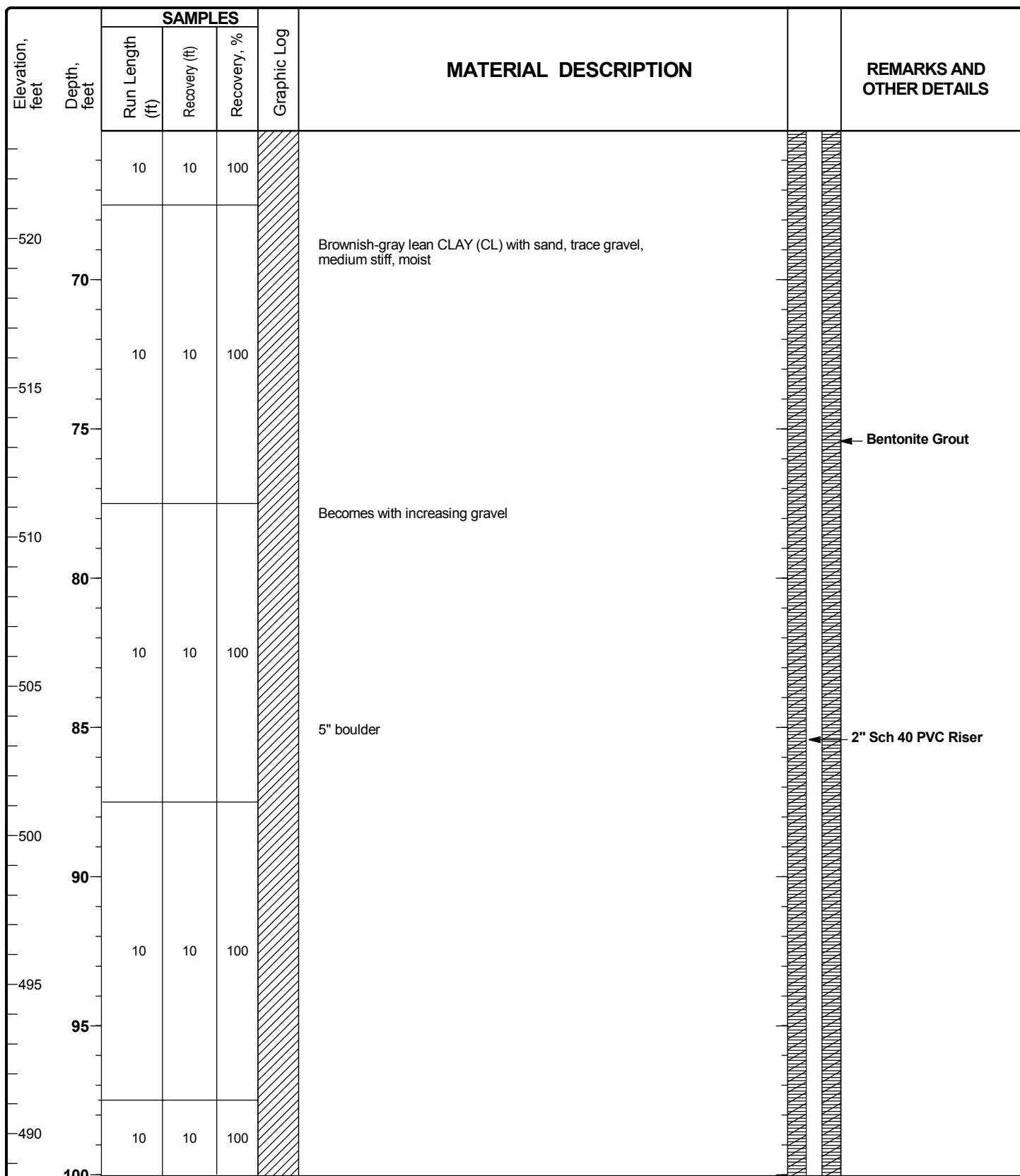
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

BKG-2

Sheet 3 of 5



## Project: DTE-CCR Groundwater Investigation

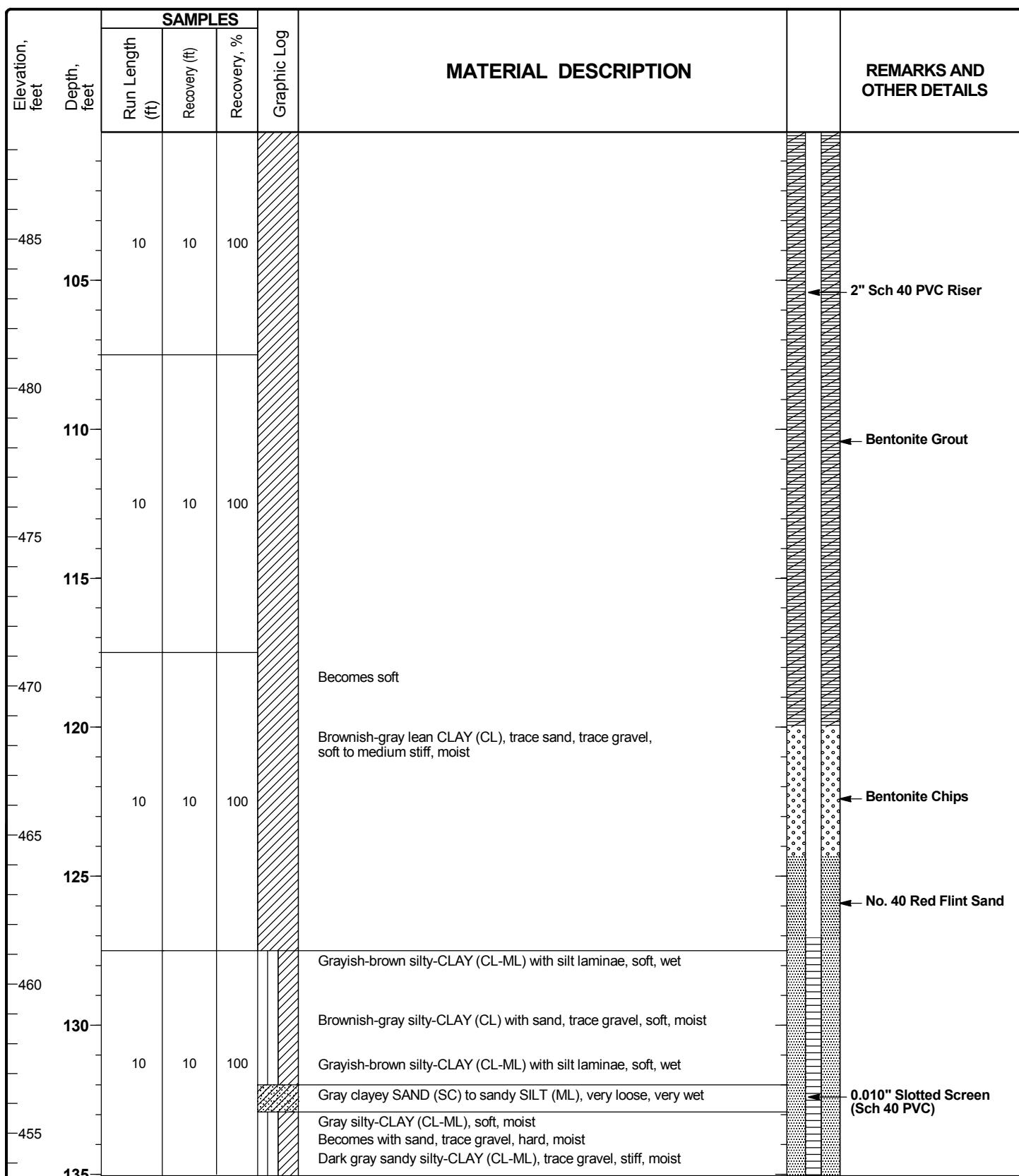
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

BKG-2

Sheet 4 of 5



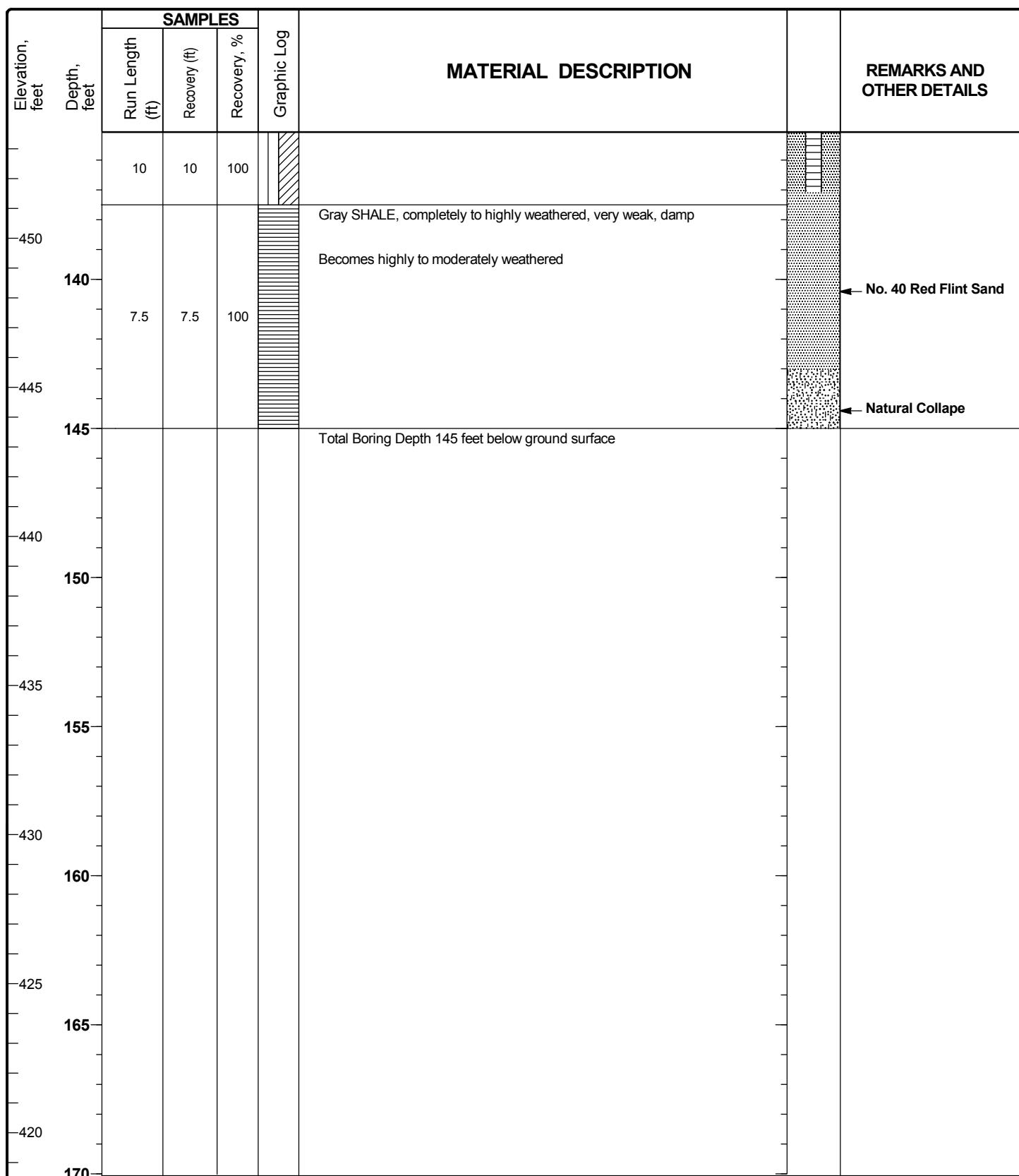
## Project: DTE-CCR Groundwater Investigation

Project Location: DTE St. Clair

Project Number: 6056402.3

Log of  
BKG-2

Sheet 5 of 5



**Project: DTE-CCR Groundwater Investigation**

Project Location: DTE St. Clair

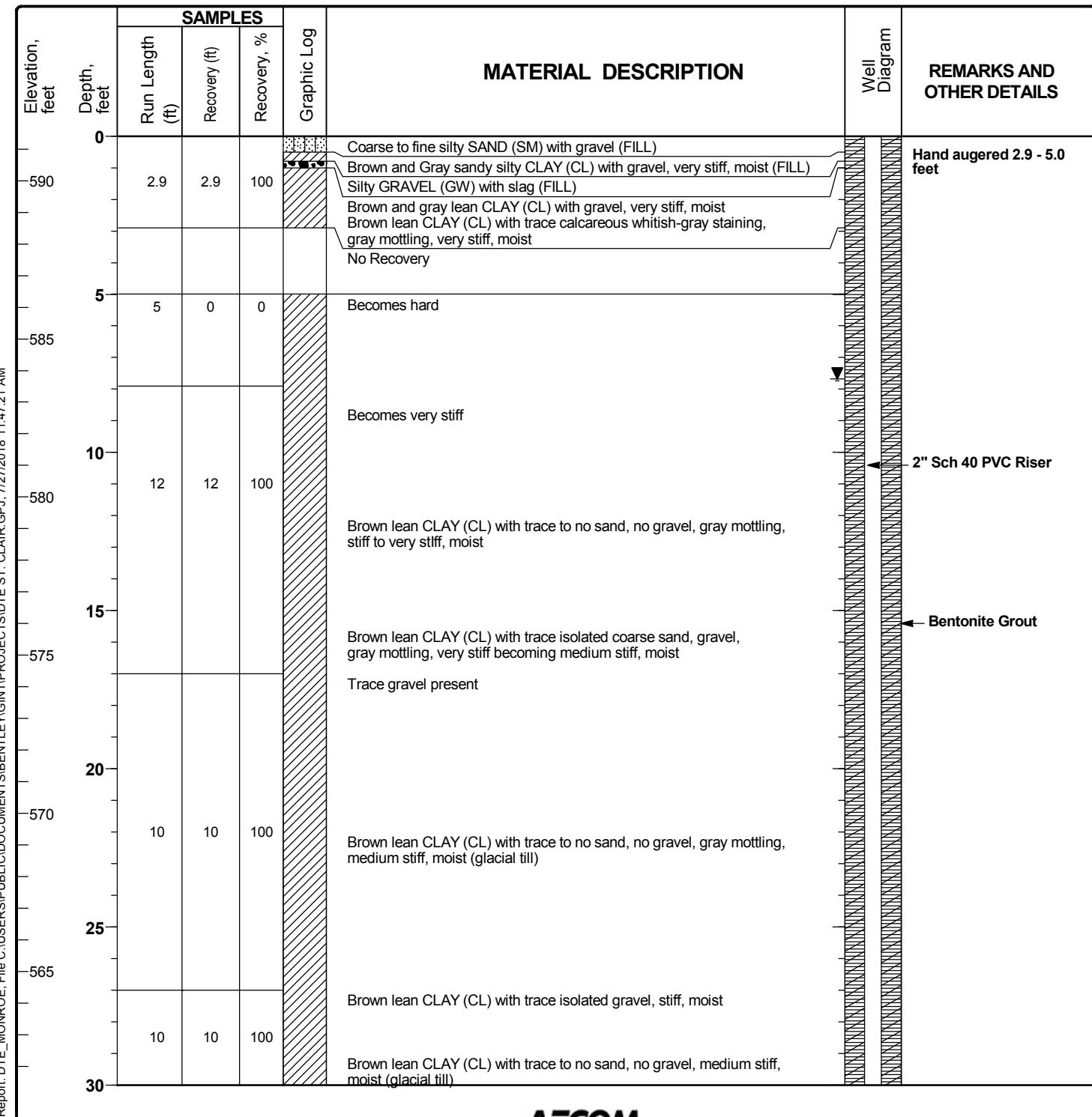
Project Number: 6056402.3

**Log of**

**MW-1**

Sheet 1 of 5

Date(s) Drilled	5/24/2018 to 5/25/2018	Logged By	T. George	Checked By	WBL
Drilling Method	Sonic	Drill Bit Size/Type	6" OD casing	Total Depth of Borehole	145 ft
Drill Rig Type	ProSonic 600 Truck Mount	Drilling Contractor	Cascade	Surface Elevation	591.41 ft msl
Borehole Backfill	Monitoring Well	Sampling Method(s)	Sonic	Top of Casing Elevation	591.29 ft msl
Boring Location	467065.76, 13629714.33	Groundwater Level(s)	7.67 ft. measured 06/25/2018		



## Project: DTE-CCR Groundwater Investigation

Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-1

Sheet 2 of 5

Elevation, feet	Depth, feet	SAMPLES			Graphic Log	MATERIAL DESCRIPTION		REMARKS AND OTHER DETAILS
		Run Length (ft)	Recovery (ft)	Recovery, %				
30	-560	10	10	100		Becomes grayish-brown		
35	-555					Becomes grayish-brown		2" Sch 40 PVC Riser
40	-550	10	10	100		Grayish-brown lean CLAY (CL) with trace to no sand, no gravel, medium stiff, moist		
45	-545					Becomes soft to medium stiff		Bentonite Grout
50	-540	10	10	100		Becomes soft		
55	-535					Grayish-brown lean CLAY (CL) with trace to no sand, no gravel, soft to medium stiff, moist		
60	-530	10	10	100		Becomes soft to medium soft with trace isolated coarse sand		
65								

## Project: DTE-CCR Groundwater Investigation

Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-1

Sheet 3 of 5

Elevation, feet	Depth, feet	SAMPLES			Graphic Log	MATERIAL DESCRIPTION		REMARKS AND OTHER DETAILS
		Run Length (ft)	Recovery (ft)	Recovery, %				
-525		10	10	100		Brownish-gray lean CLAY (CL) with sand to trace sand, trace gravel, medium stiff, moist (glacial till)		
-520	70	10	10	100				2" Sch 40 PVC Riser
-515	75	10	10	100				
-510	80	10	10	100				Bentonite Grout
-505	85	10	10	100				
-500	90	10	10	100				
-495	95	10	10	100				
-100		10	10	100				

## Project: DTE-CCR Groundwater Investigation

Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-1

Sheet 4 of 5

Elevation, feet	Depth, feet	SAMPLES			Graphic Log	MATERIAL DESCRIPTION		REMARKS AND OTHER DETAILS
		Run Length (ft)	Recovery (ft)	Recovery, %				
490								
105		10	10	100				2" Sch 40 PVC Riser
485								Bentonite Grout
110								
480		10	10	100				
115								
475								
120		10	10	100				Bentonite Chips
470								
125								
465						Becomes grayish-brown with reddish-brown mottles		
						Grayish-brown lean CLAY (CL) to silty-CLAY (CL-ML), trace isolated coarse sand, soft to medium stiff, moist		
130		10	10	100				No. 40 Red Flint Sand
460						Becomes moist to wet		0.010" Slotted Screen (Sch 40 PVC)
135						Grayish-brown sandy silty-CLAY (CL-ML), trace gravel, medium soft to soft, moist to wet		

## Project: DTE-CCR Groundwater Investigation

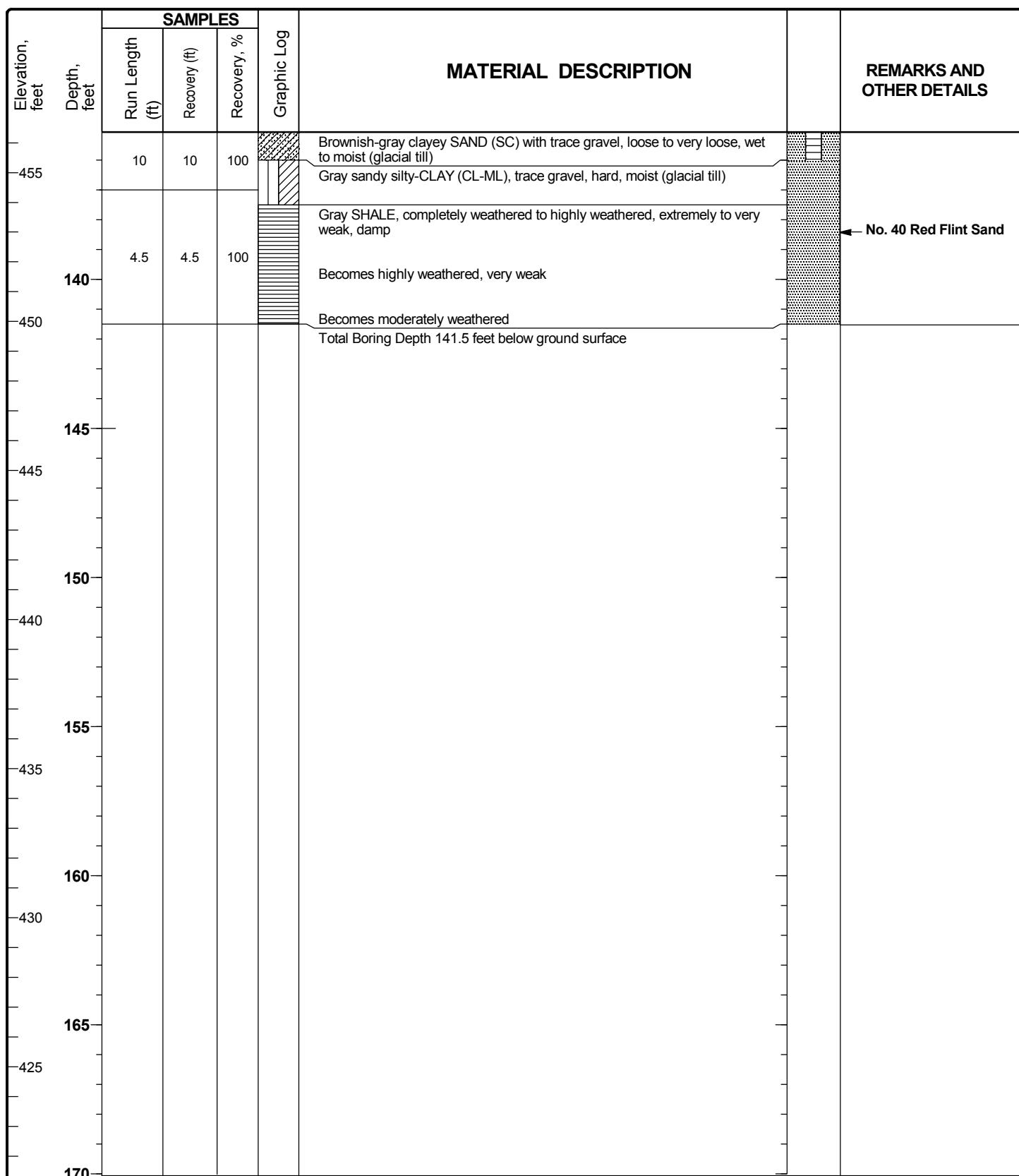
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-1

Sheet 5 of 5



**Project: DTE-CCR Groundwater Investigation**

Project Location: DTE St. Clair

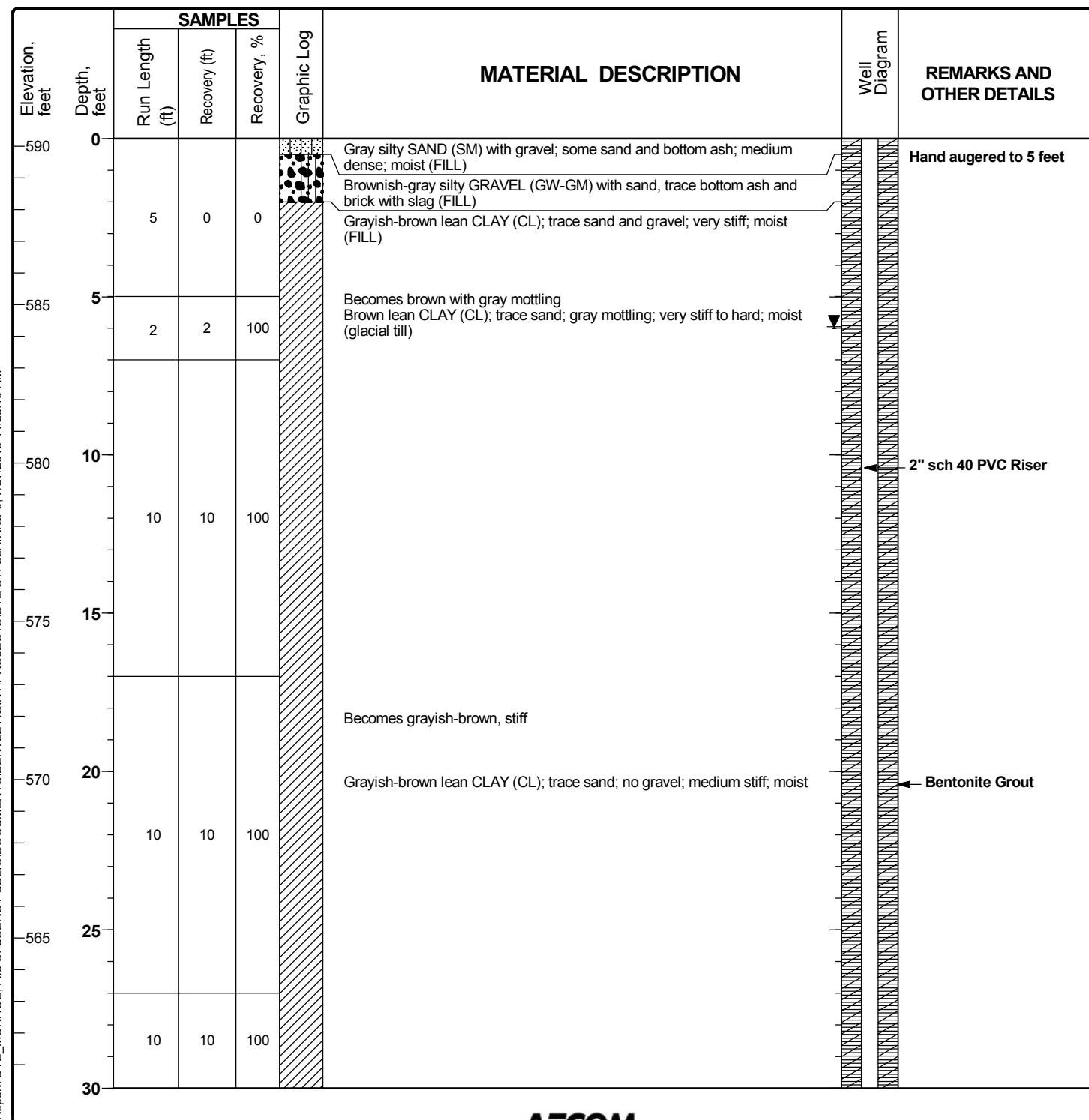
Project Number: 6056402.3

**Log of**

**MW-2**

Sheet 1 of 5

Date(s) Drilled	6/11/2018 to 6/12/2018	Logged By	T. George	Checked By	WBL
Drilling Method	Sonic	Drill Bit Size/Type	6" OD casing	Total Depth of Borehole	144 ft
Drill Rig Type	ProSonic 600 Truck Mount	Drilling Contractor	Cascade	Surface Elevation	590.25 ft msl
Borehole Backfill	Monitoring Well	Sampling Method(s)	Sonic	Top of Casing Elevation	589.94 ft msl
Boring Location	466770.78, 13629658.84	Groundwater Level(s)	5.94 ft. measured 06/25/2018		



## Project: DTE-CCR Groundwater Investigation

Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-2

Sheet 2 of 5

Elevation, feet	Depth, feet	SAMPLES			Graphic Log	MATERIAL DESCRIPTION		REMARKS AND OTHER DETAILS
		Run Length (ft)	Recovery (ft)	Recovery, %				
560	30	10	10	100		Trace isolated gravel		
555	35					Becomes soft		
550	40	10	10	100				2" sch 40 PVC Riser
545	45							
540	50	10	10	100		Becomes brownish-gray		
535	55					Becomes medium stiff		
530	60	10	10	100		Brownish-gray lean CLAY (CL) with sand; trace gravel; medium stiff; moist (glacial till)		Bentonite Grout
65								

## Project: DTE-CCR Groundwater Investigation

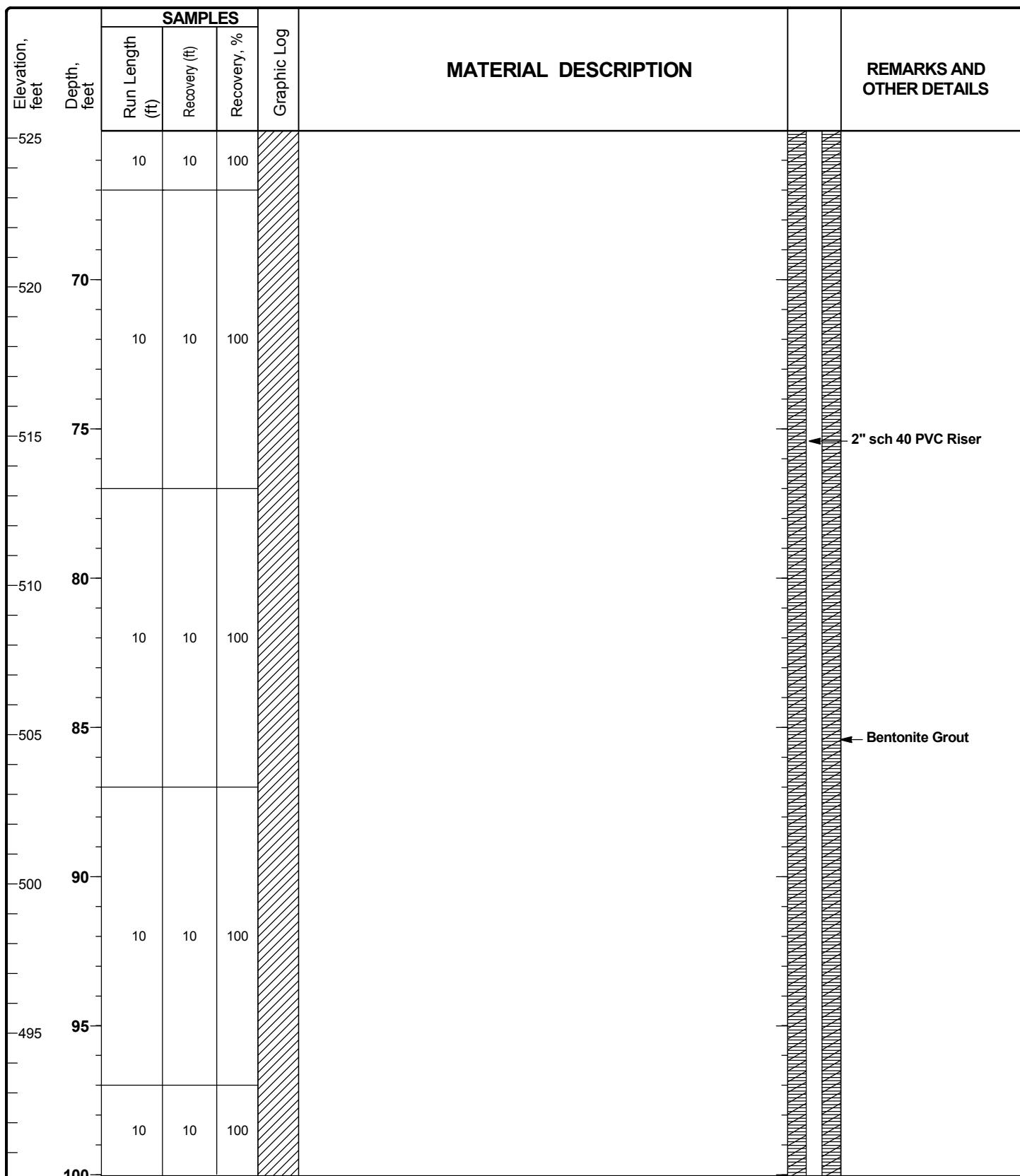
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-2

Sheet 3 of 5



## Project: DTE-CCR Groundwater Investigation

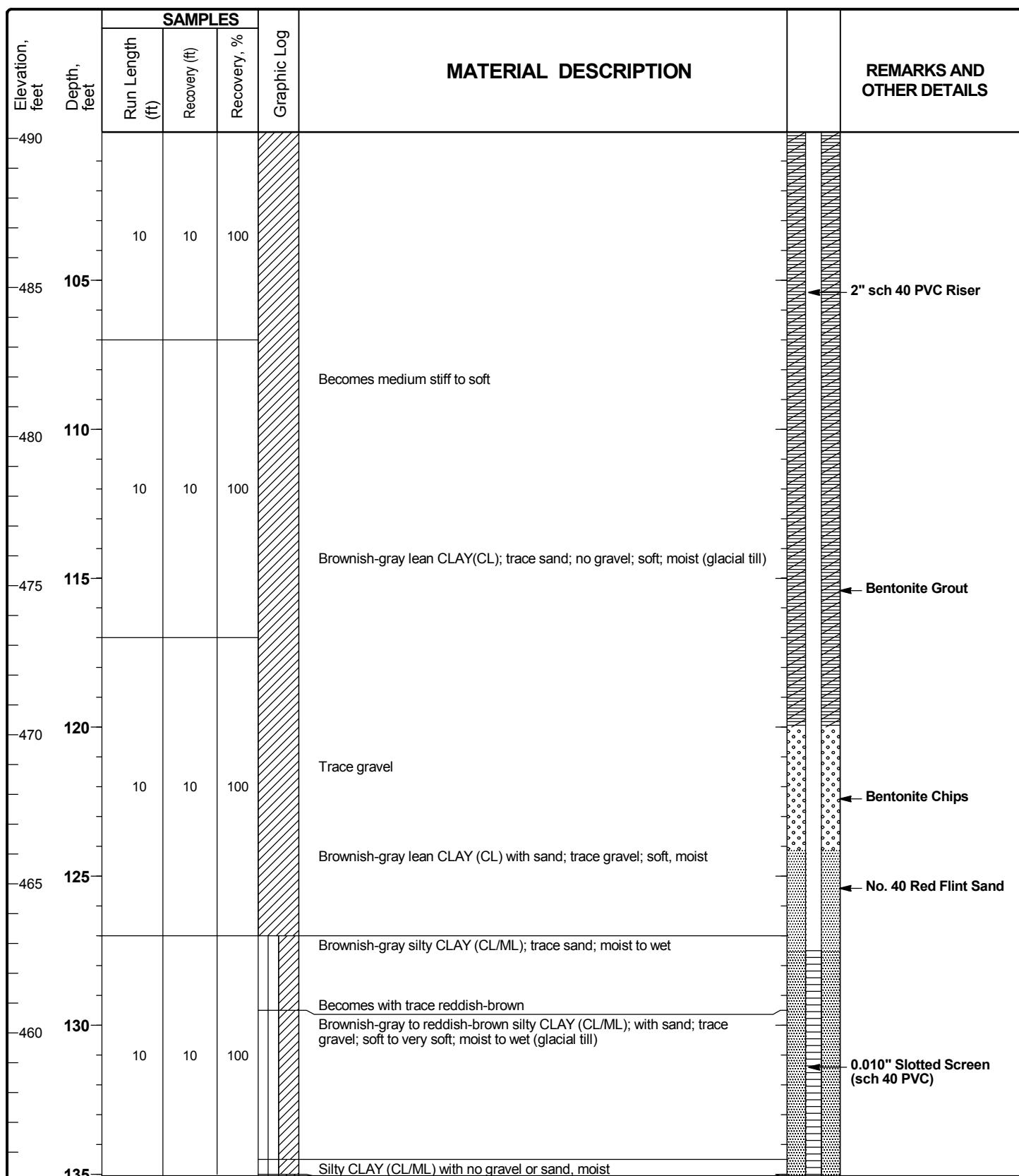
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-2

Sheet 4 of 5



## Project: DTE-CCR Groundwater Investigation

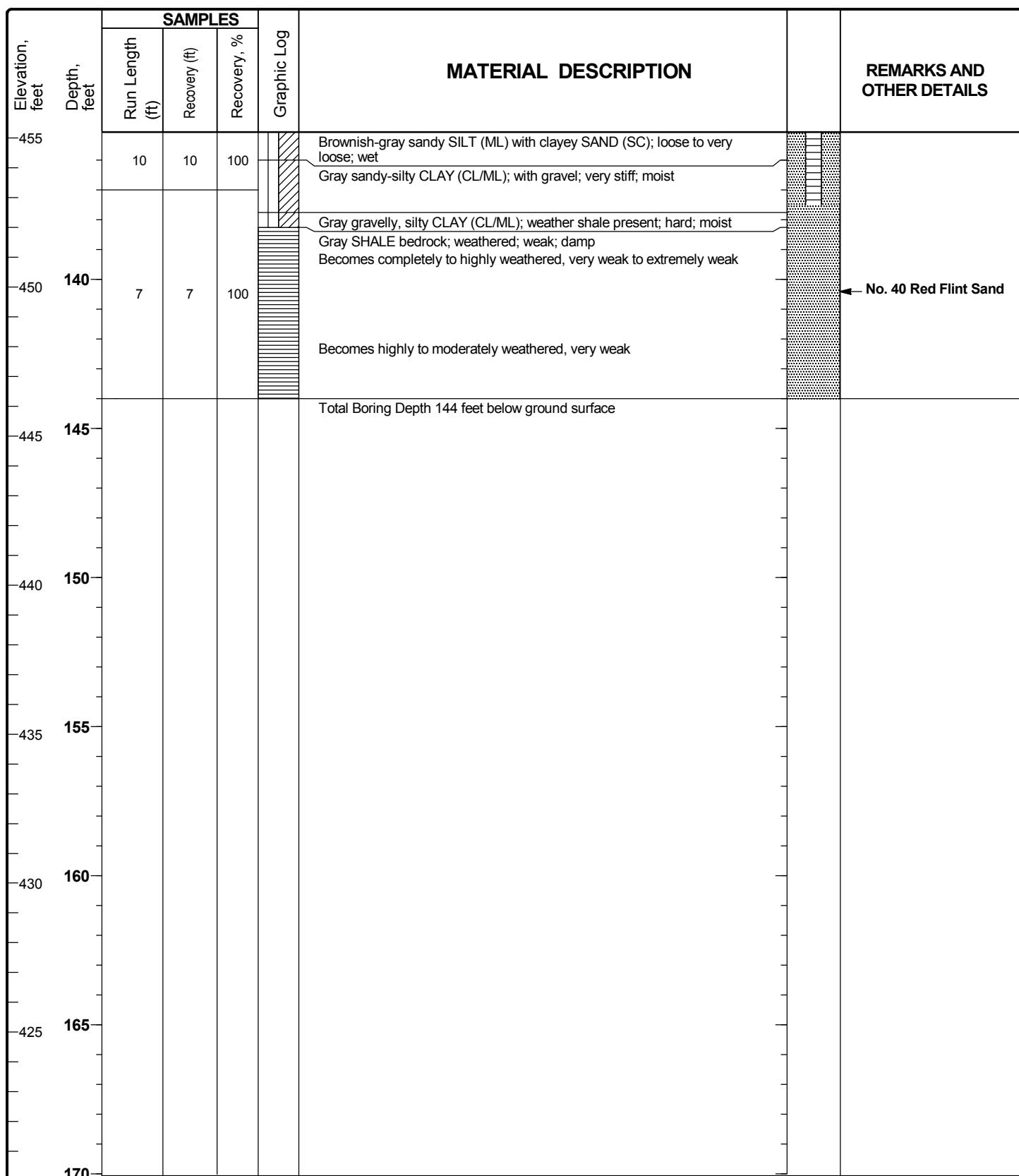
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-2

Sheet 5 of 5



**Project: DTE-CCR Groundwater Investigation**

Project Location: DTE St. Clair

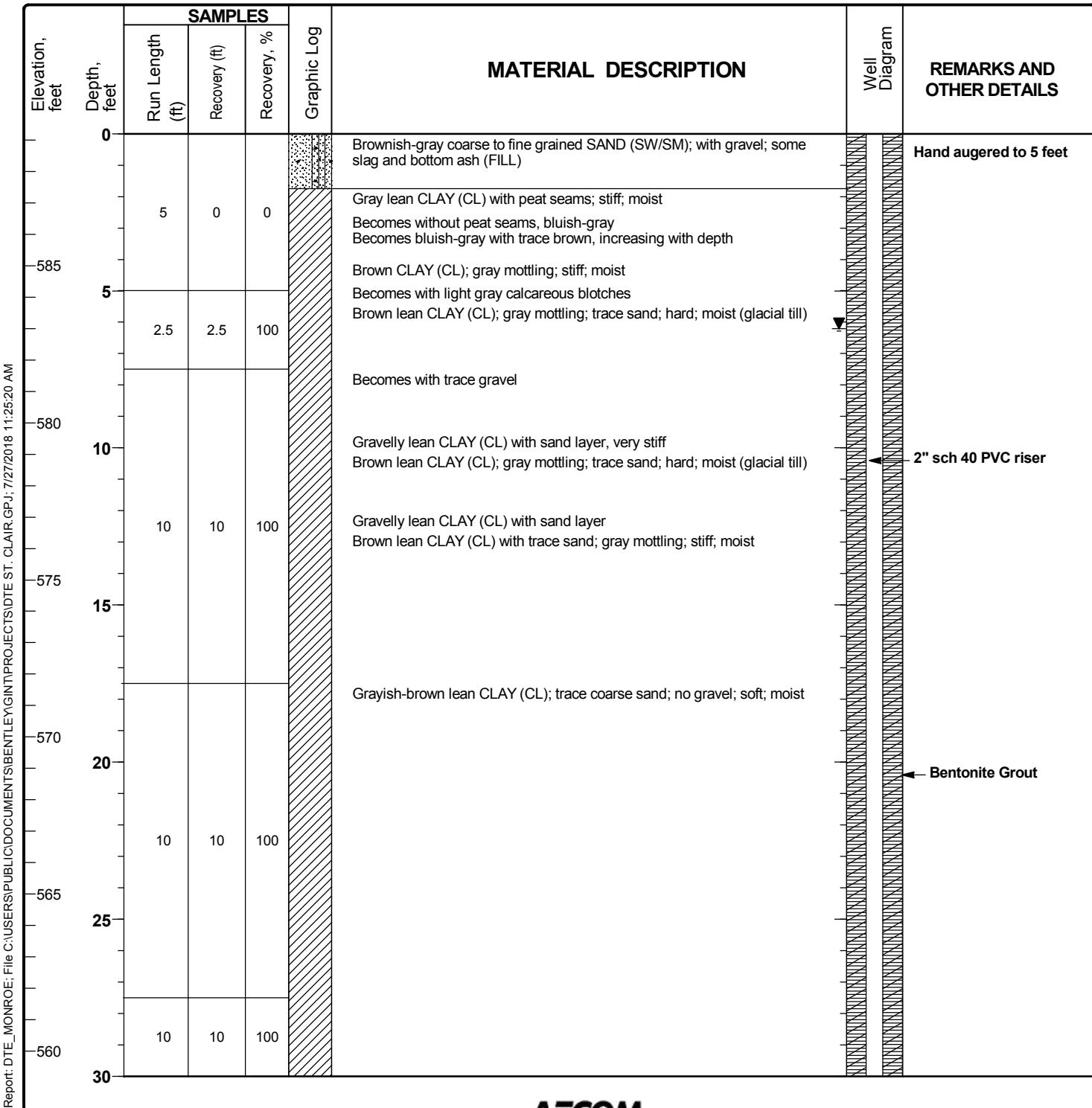
Project Number: 6056402.3

**Log of**

**MW-3**

Sheet 1 of 5

Date(s) Drilled	6/7/2018 to 6/7/2018	Logged By	T. George	Checked By	WBL
Drilling Method	Sonic	Drill Bit Size/Type	6" OD casing	Total Depth of Borehole	140 ft
Drill Rig Type	ProSonic 600 Truck Mount	Drilling Contractor	Cascade	Surface Elevation	589.20 ft msl
Borehole Backfill	Monitoring Well	Sampling Method(s)	Sonic	Top of Casing Elevation	589.02 ft msl
Boring Location	466489.65, 13629561.07	Groundwater Level(s)	6.21 ft. measured 06/25/2018		



## Project: DTE-CCR Groundwater Investigation

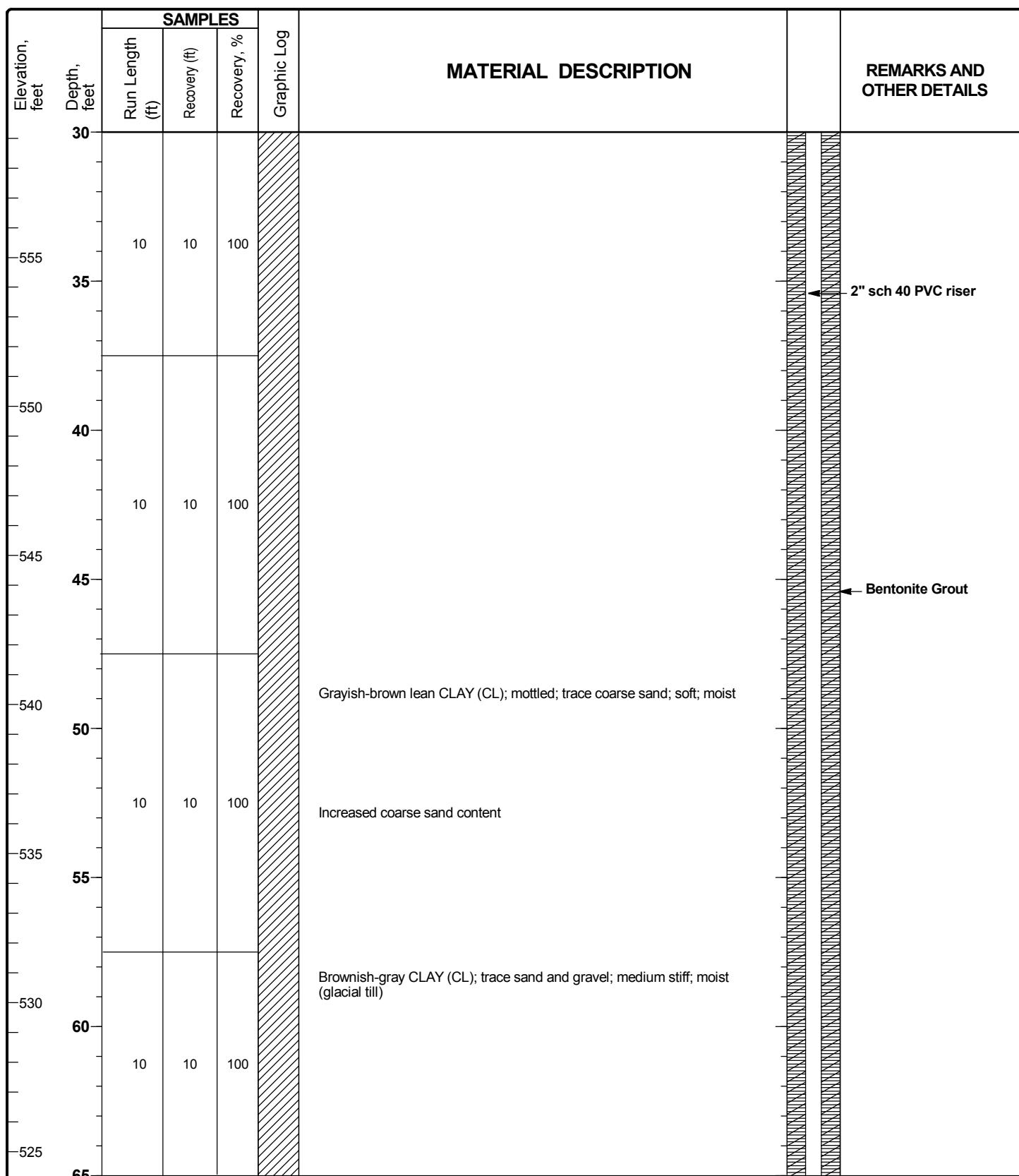
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-3

Sheet 2 of 5



## Project: DTE-CCR Groundwater Investigation

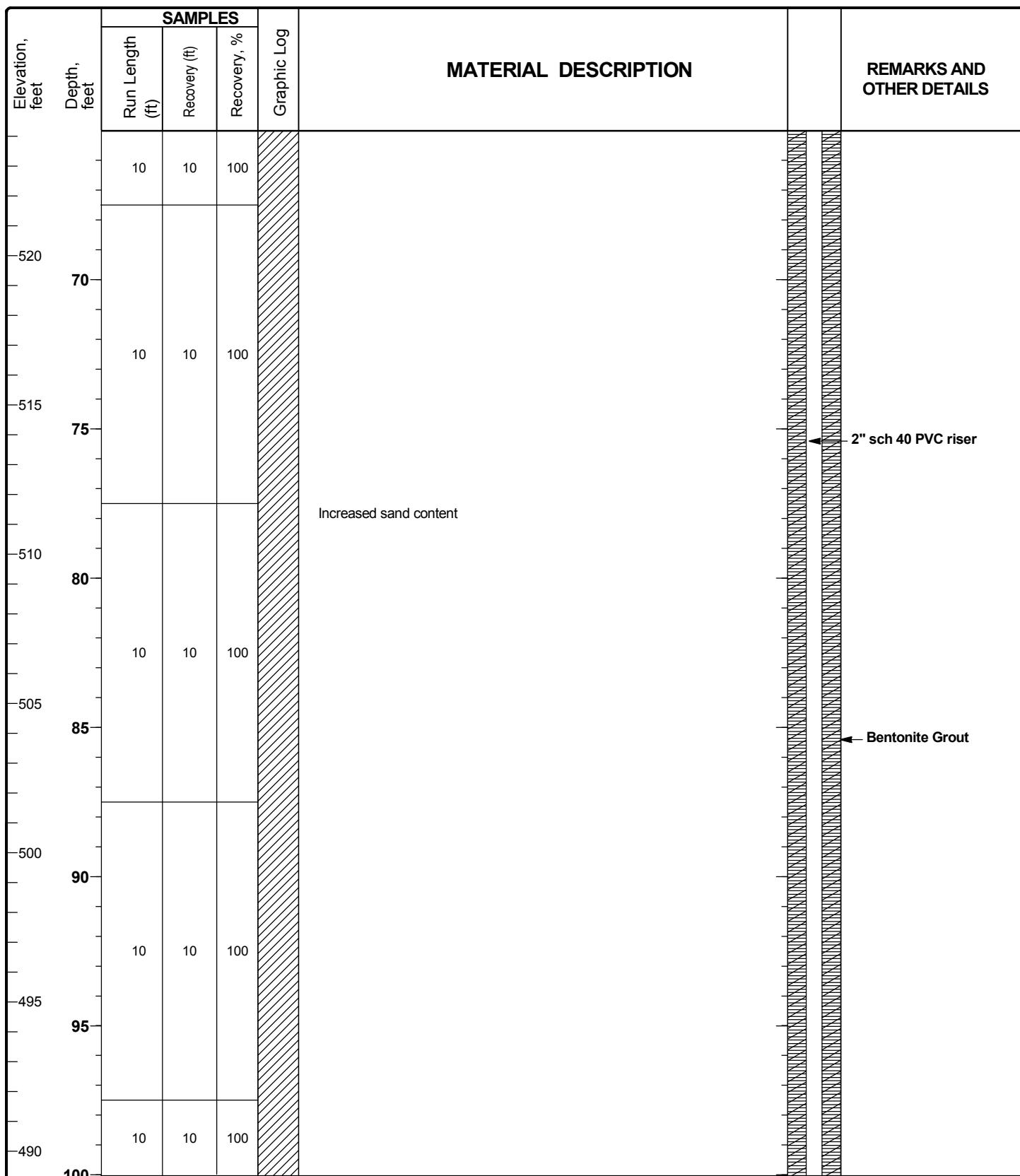
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-3

Sheet 3 of 5



## Project: DTE-CCR Groundwater Investigation

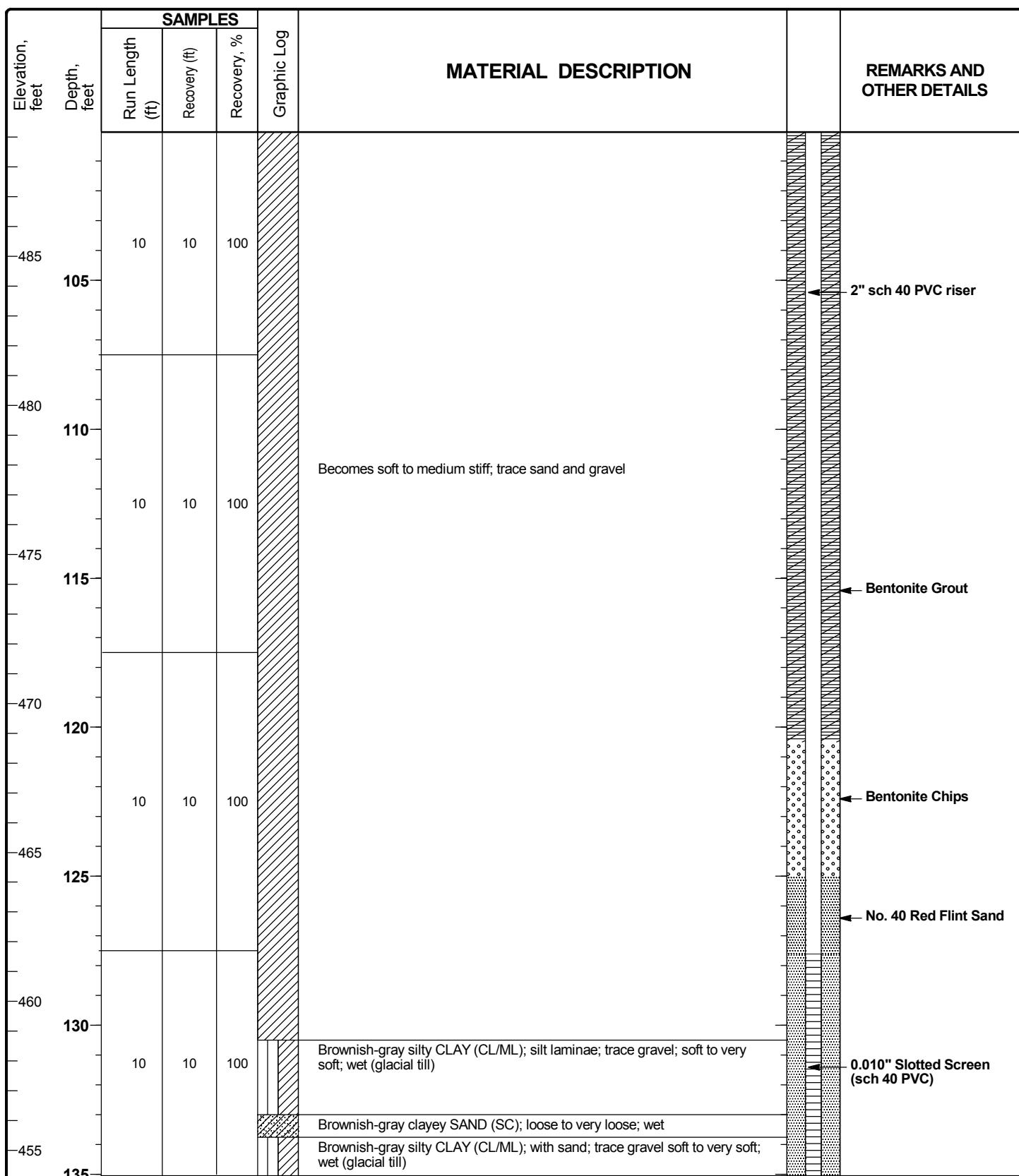
Project Location: DTE St. Clair

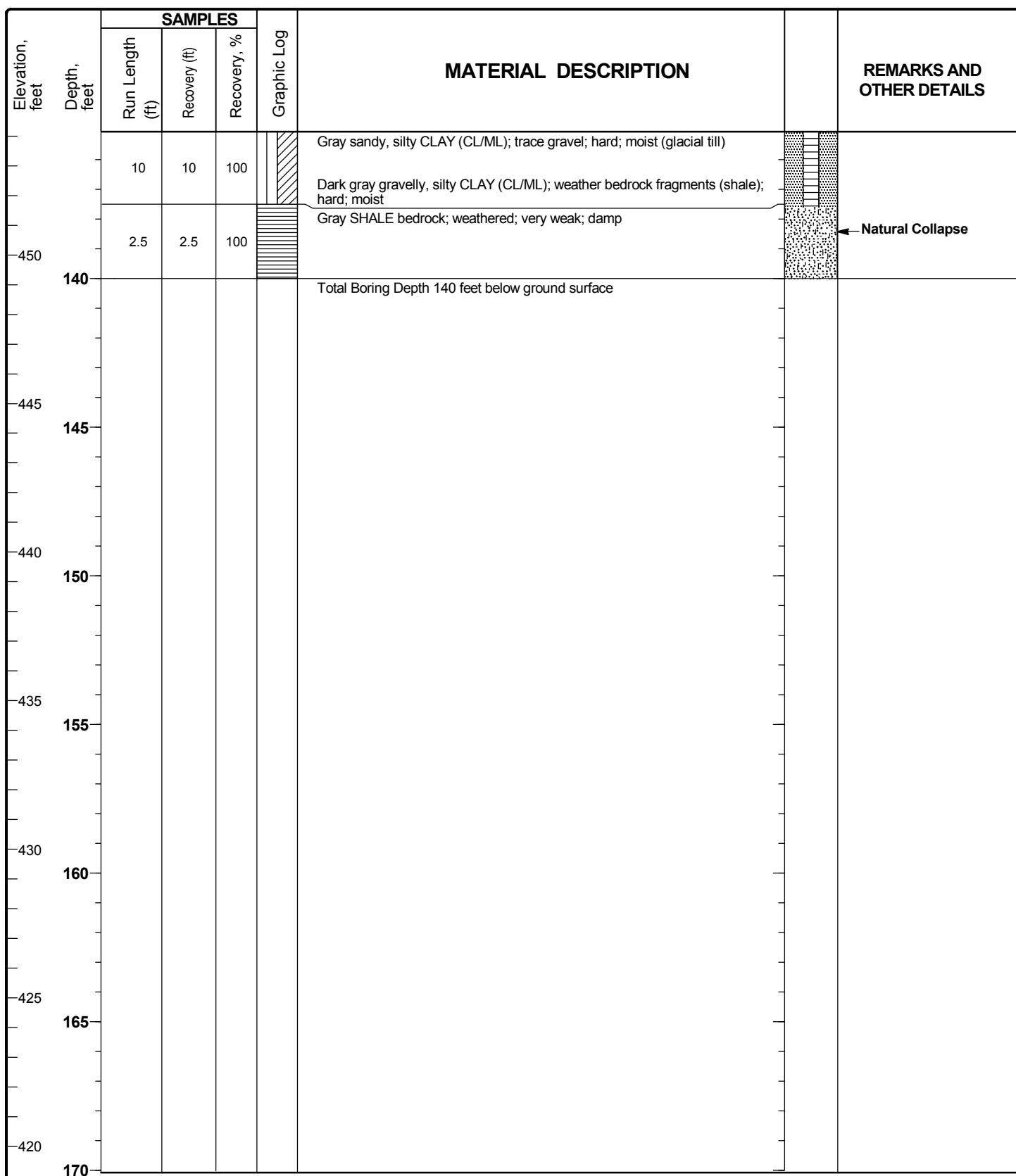
Project Number: 6056402.3

## Log of

MW-3

Sheet 4 of 5





**Project: DTE-CCR Groundwater Investigation**

Project Location: DTE St. Clair

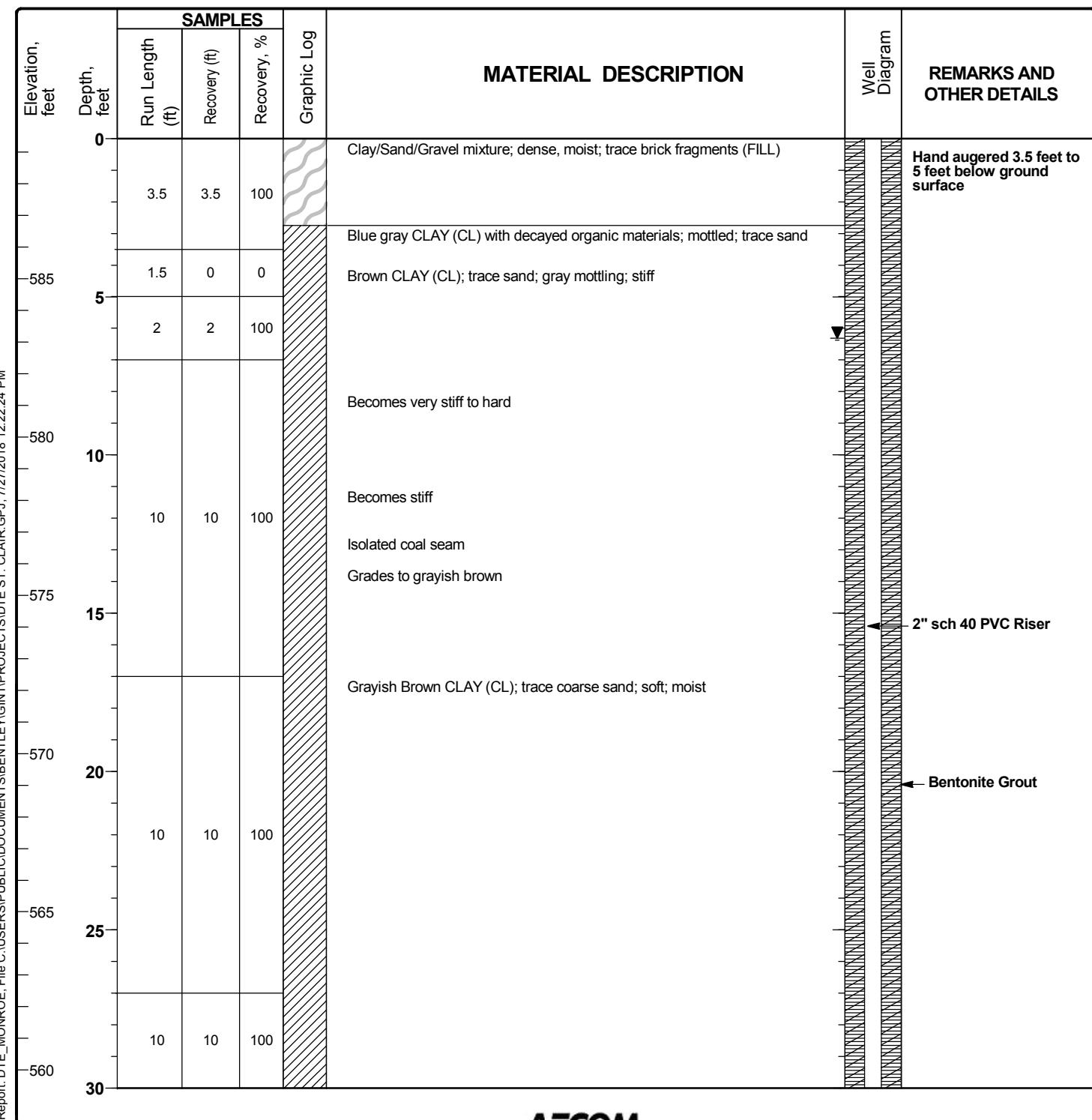
Project Number: 6056402.3

**Log of**

**MW-4**

Sheet 1 of 5

Date(s) Drilled	5/29/2018 to 5/30/2018	Logged By	T. George	Checked By	WBL
Drilling Method	Sonic	Drill Bit Size/Type	6" OD casing	Total Depth of Borehole	142 ft
Drill Rig Type	ProSonic 600 Truck Mount	Drilling Contractor	Cascade	Surface Elevation	589.43 ft msl
Borehole Backfill	Monitoring Well	Sampling Method(s)	Sonic	Top of Casing Elevation	589.16 ft msl
Boring Location	466246.85, 13629419.29	Groundwater Level(s)	6.31 ft. measured 06/25/2018		



## Project: DTE-CCR Groundwater Investigation

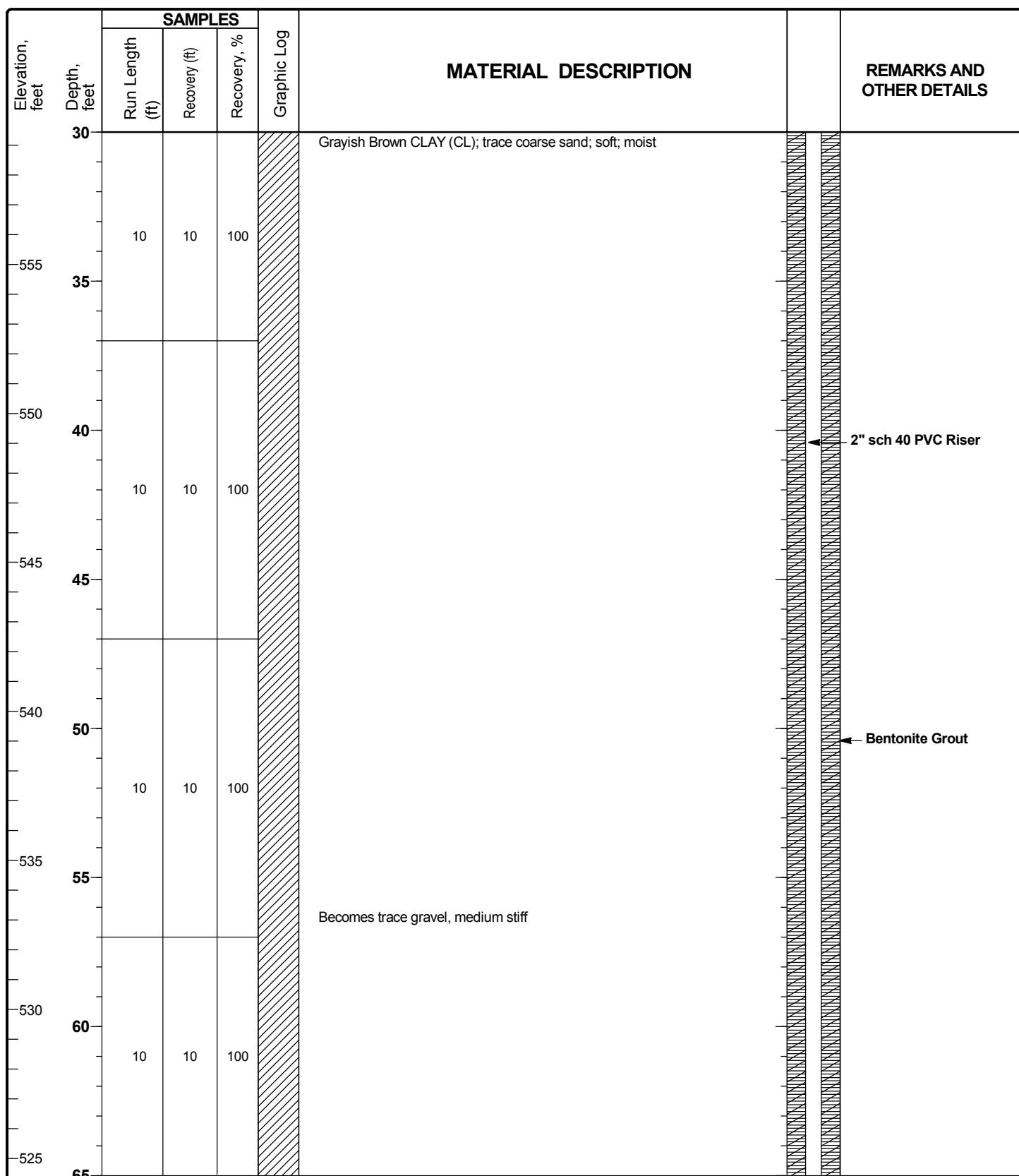
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-4

Sheet 2 of 5



## Project: DTE-CCR Groundwater Investigation

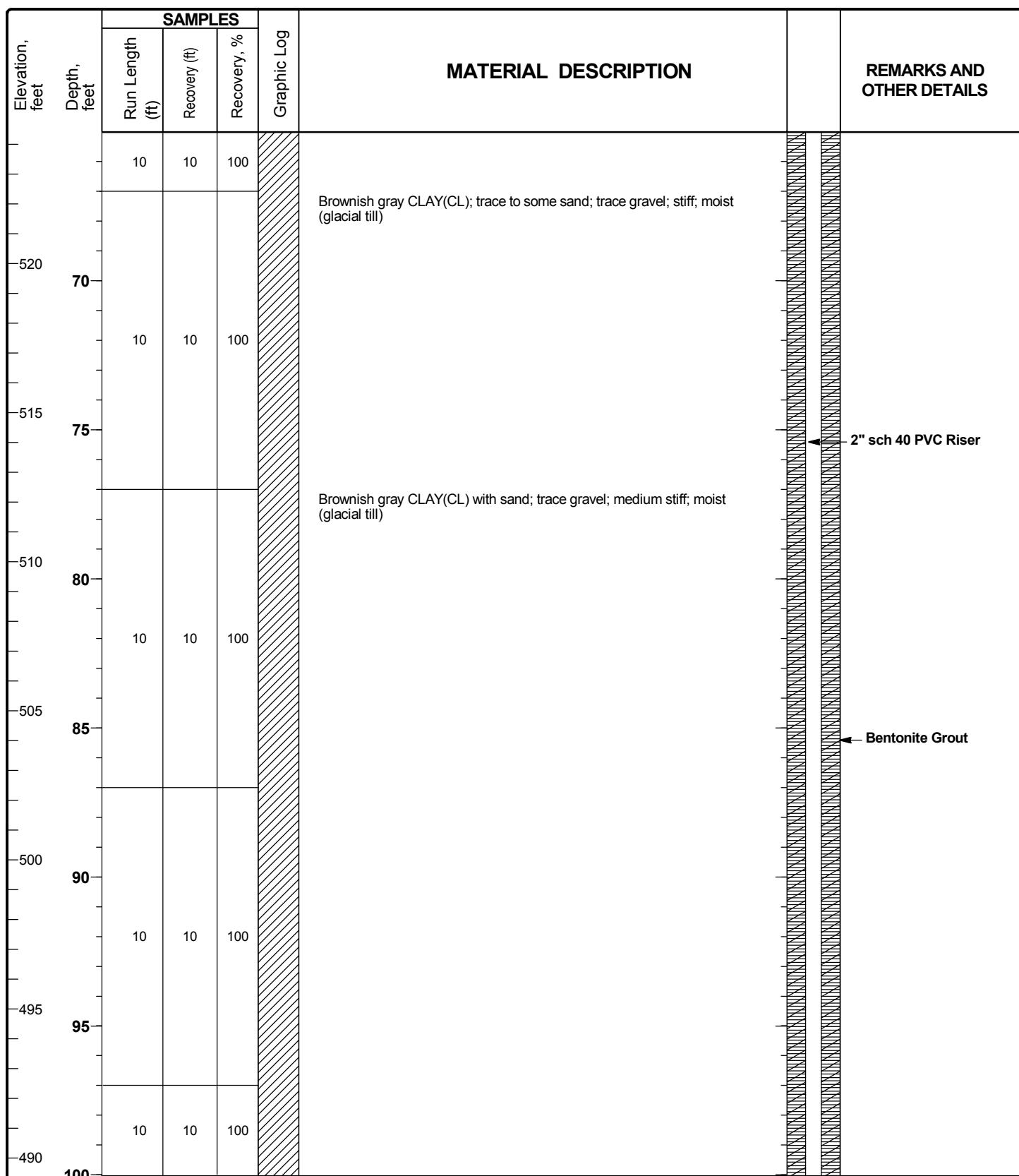
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-4

Sheet 3 of 5



## Project: DTE-CCR Groundwater Investigation

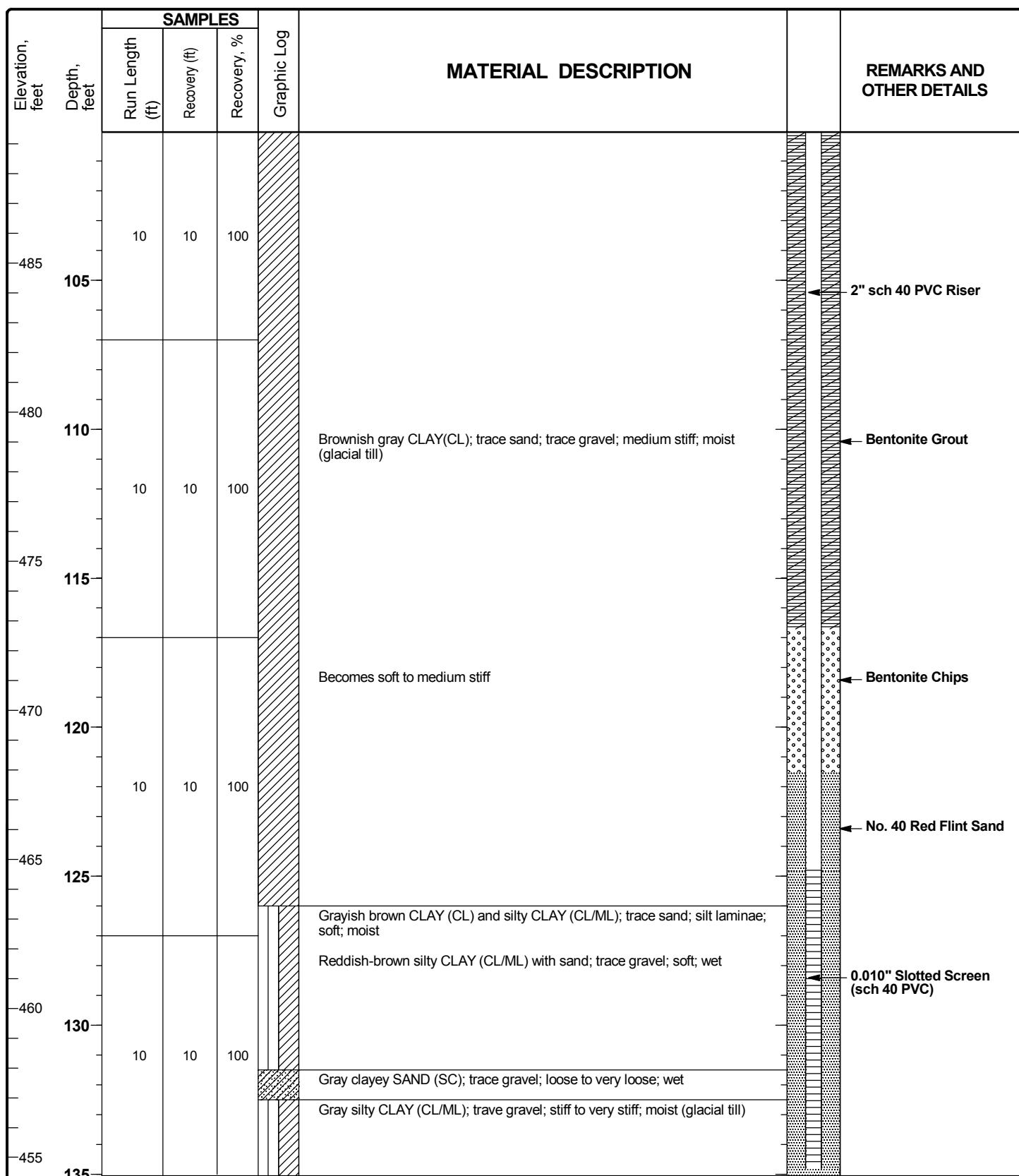
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-4

Sheet 4 of 5



## Project: DTE-CCR Groundwater Investigation

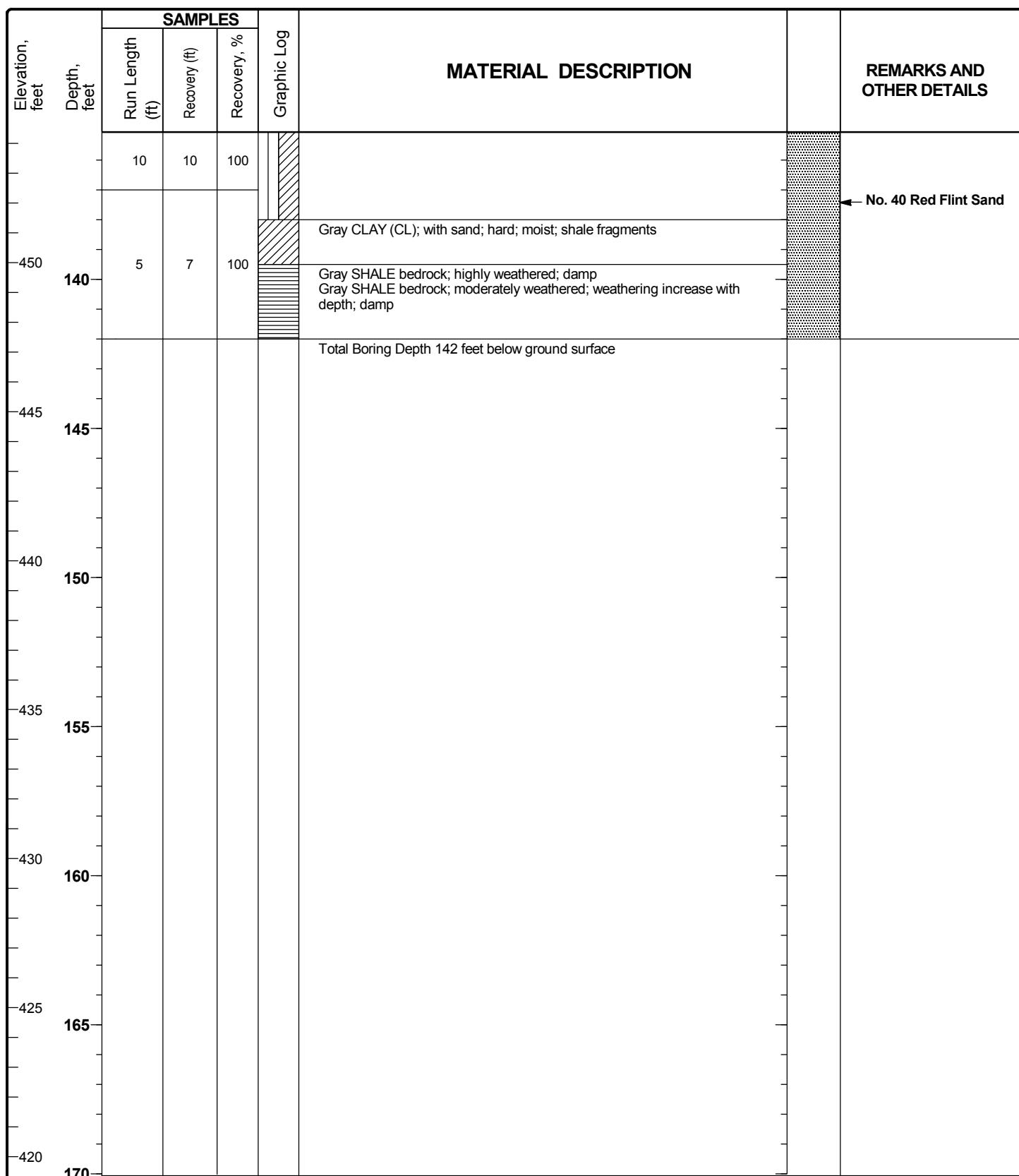
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-4

Sheet 5 of 5



**Project: DTE-CCR Groundwater Investigation**

Project Location: DTE St. Clair

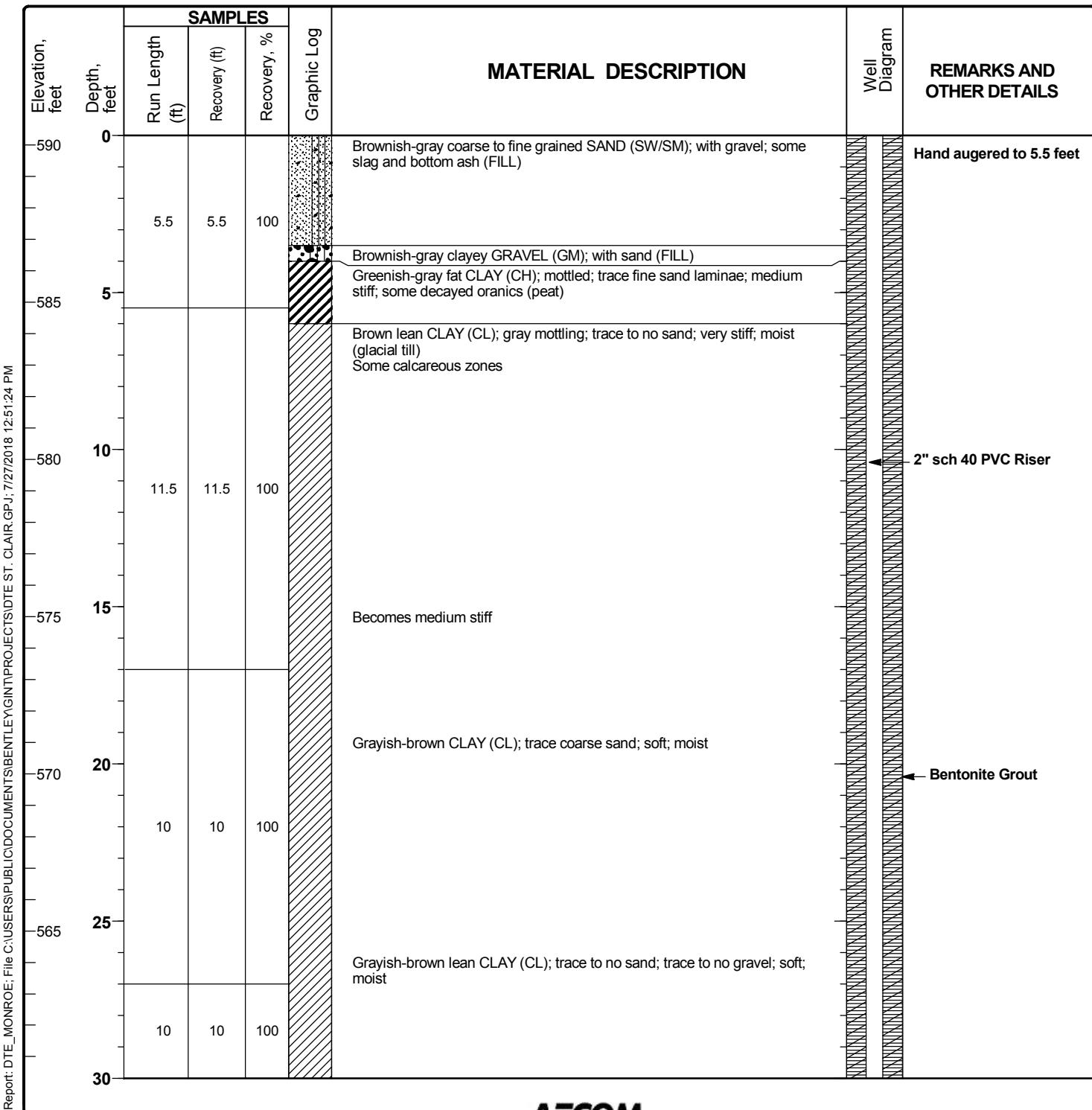
Project Number: 6056402.3

**Log of**

**MW-5**

Sheet 1 of 5

Date(s) Drilled	5/31/2018 to 5/31/2018	Logged By	T. George	Checked By	WBL
Drilling Method	Sonic	Drill Bit Size/Type	6" OD casing	Total Depth of Borehole	143.5 ft
Drill Rig Type	ProSonic 600 Truck Mount	Drilling Contractor	Cascade	Surface Elevation	590.31 ft msl
Borehole Backfill	Monitoring Well	Sampling Method(s)	Sonic	Top of Casing Elevation	590.06 ft msl
Boring Location	465857.83, 13629265.70	Groundwater Level(s)	50.15 ft. measured 06/25/2018		



## Project: DTE-CCR Groundwater Investigation

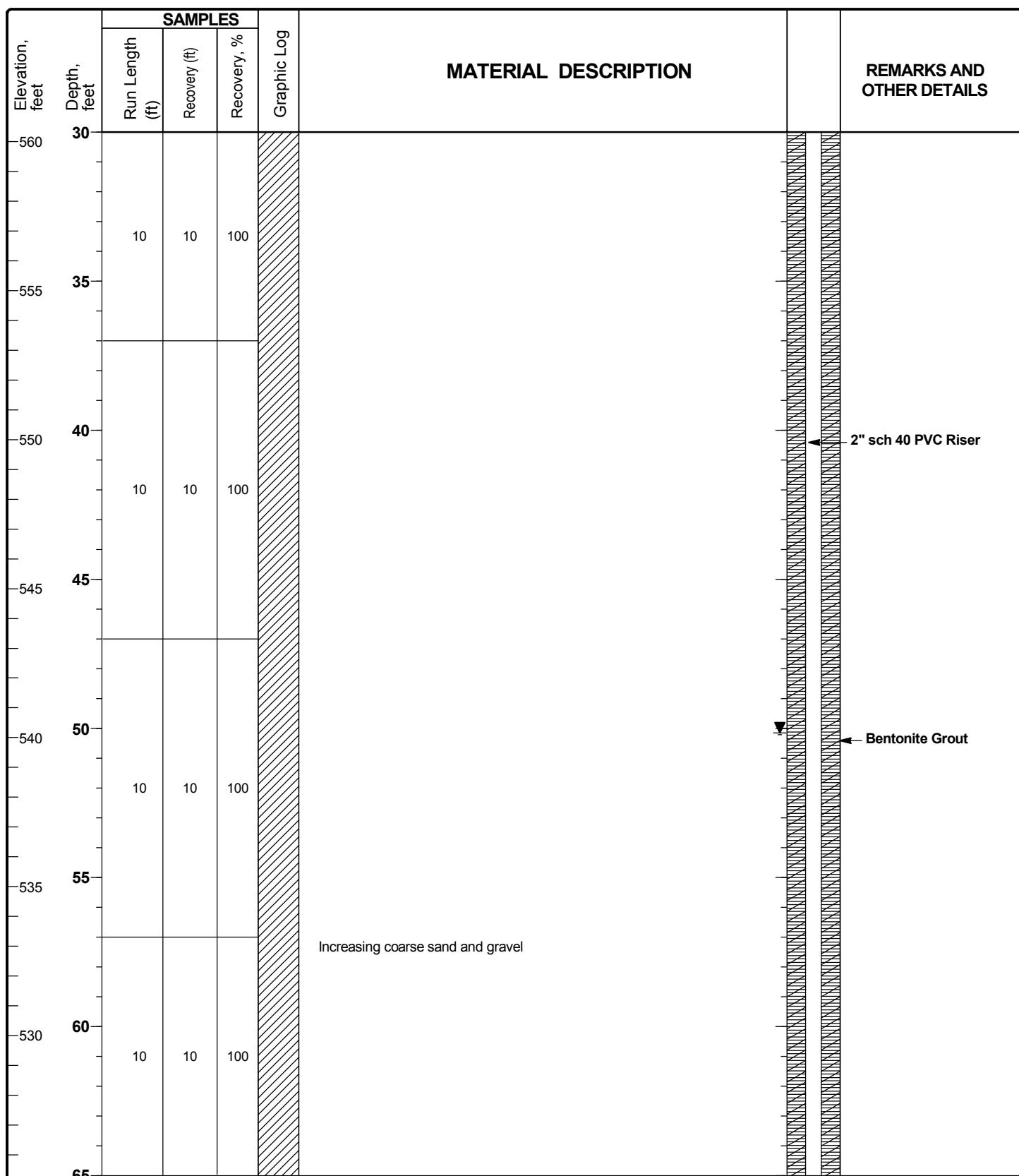
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-5

Sheet 2 of 5



## Project: DTE-CCR Groundwater Investigation

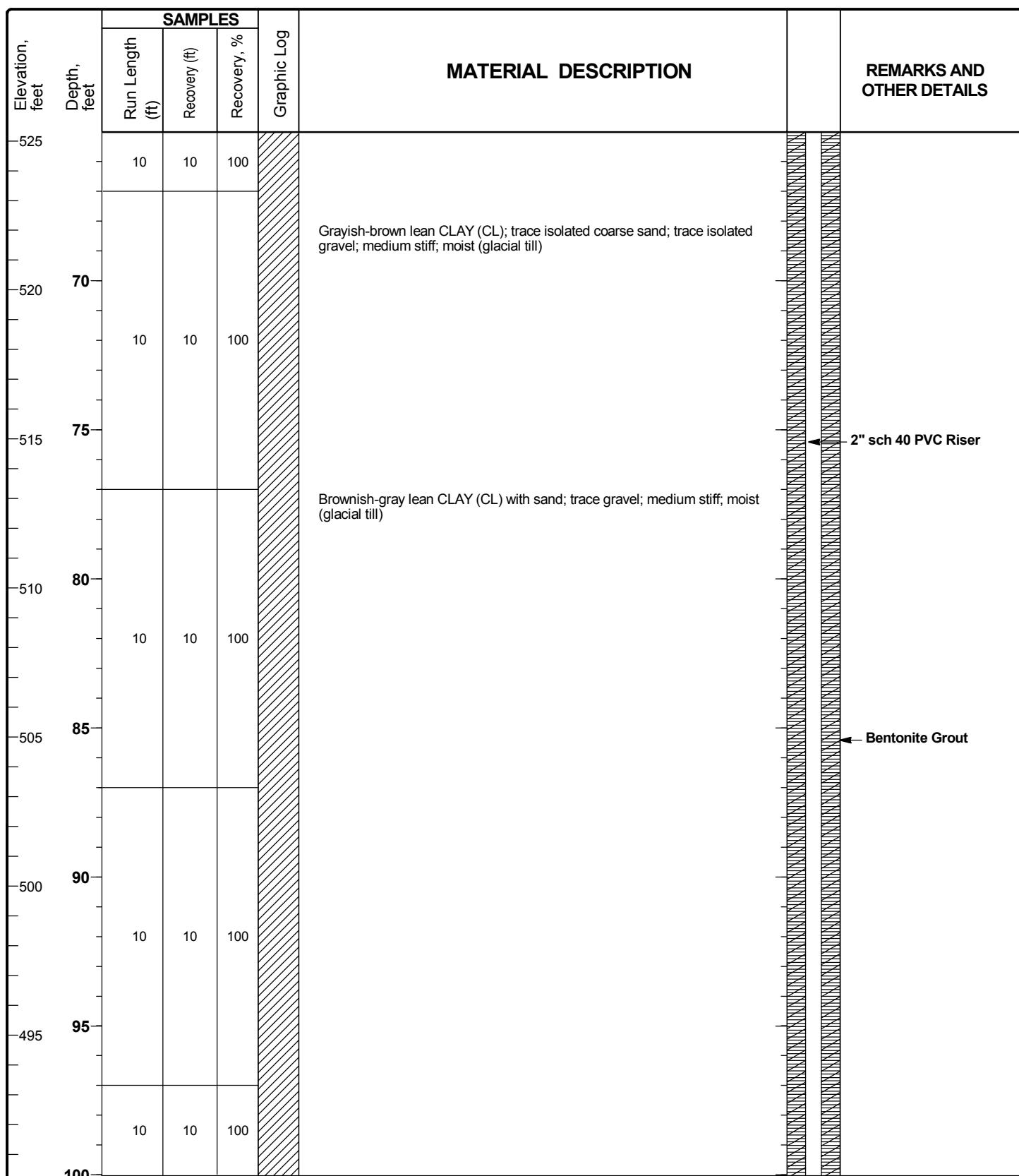
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-5

Sheet 3 of 5



## Project: DTE-CCR Groundwater Investigation

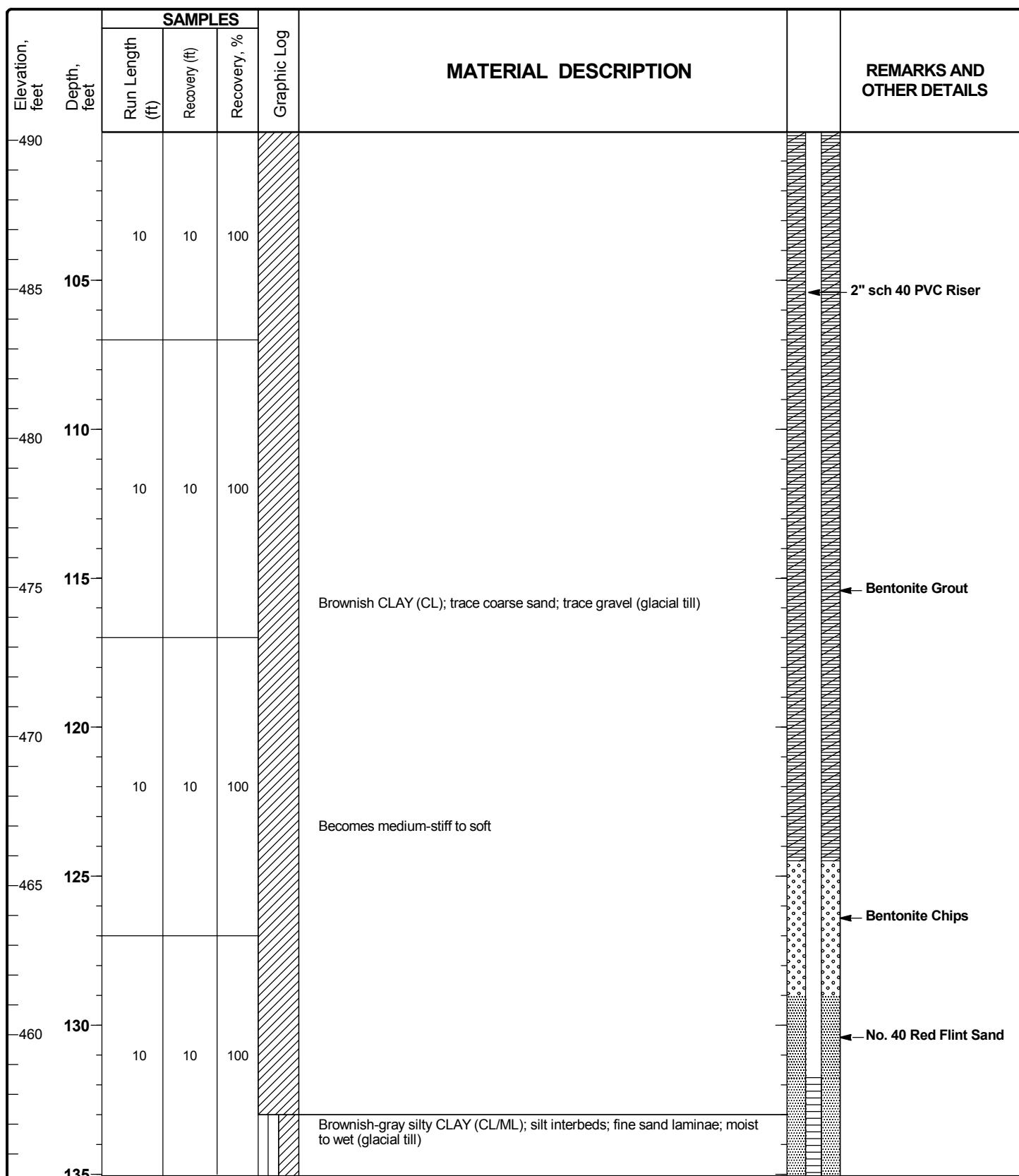
Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-5

Sheet 4 of 5



## Project: DTE-CCR Groundwater Investigation

Project Location: DTE St. Clair

Project Number: 6056402.3

## Log of

MW-5

Sheet 5 of 5

