John E. Amos Power Plant

Notice of Intent to Comply With the Site-Specific Alternative to Initiation of Closure

CCR Unit – Bottom Ash Pond

As required by 40 CFR 257.103(f)(1)(ix)(A), this is a notification that on November 30, 2020 John E. Amos Power Plant (Amos Plant) submitted a site-specific alternative to initiation of closure due to development of alternative capacity infeasible to US EPA. The submission has been placed in Amos Plant's operating record and posted to the CCR Rule Compliance Data and Information website.

American Electric Power 1 Riverside Plaza Columbus, OH 43215 aep.com

November 30, 2020

Submitted Electronically via Email

Mr. Andrew R. Wheeler, EPA Administrator **Environmental Protection Agency** 1200 Pennsylvania Avenue, N.W. Mail Code 5304-P Washington, DC 20460

RE: Appalachian Power Company John E. Amos Power Plant Alternative Closure Demonstration

Dear Administrator Wheeler,

Appalachian Power Company (APCO) John E. Amos Power Plant (Amos Plant) hereby submits this request to the U.S. Environmental Protection Agency (EPA) for approval of a site-specific alternative deadline to initiate closure pursuant to 40 C.F.R. $\S 257.103(f)(1)$ for the Bottom Ash Pond located at the Amos Plant near Winfield, West Virginia. Amos Plant is requesting an extension pursuant to 40 C.F.R. $\S 257.103(f)(1)$ to allow the Bottom Ash Pond to continue to receive CCR and non-CCR wastestreams after April 11, 2021, such that retrofits can be completed. Enclosed is a demonstration prepared by American Electric Power and Worley that addresses all of the criteria in 40 C.F.R. $\S 257.103(f)(1)(i)$ -(iii) and contains the documentation required by 40 C.F.R. \S $257.103(f)(1)(iv)$. As allowed by the agency, in lieu of hard copies of these documents, electronic files were submitted to Kirsten Hillyer, Frank Behan, and Richard Huggins via email. A separate cover letter and confidential copy of Appendix C is being submitted in hard copy by overnight mail. If you have any questions regarding this submittal, please contact me at 614-716-2281 or damiller@aep.com.

Sincerely,

) aird A. Miller

David A. Miller, P.E. Director, Land Environment & Remediation Services **Environmental Services Division**

Attachments

Kirsten Hillyer – USEPA cc: Frank Behan - USEPA Richard Huggins - USEPA

BOUNDLESS ENERGY

Appalachian Power Company

John E. Amos Power Plant

BOUNDLESS ENERGY*

Demonstration Request to Develop Alternative Disposal Capacity for the Bottom Ash Pond Complex

Prepared by:

American Electric Power Service Corporation 1 Riverside Plaza Columbus, OH 43215

and

Worley 2675 Morgantown Road Reading, PA 19607

Submitted

11/30/2020

Table of Contents

List of Figures

- Figure 2 5: Bottom Ash Pond Seasonal Groundwater Flow Direction
- Figure 6 9: Fly Ash Pond Seasonal Groundwater Flow Direction
- Figure 10 13: John E. Amos Landfill Seasonal Groundwater Flow Direction

List of Tables

- Table 1 Amos Plant CCR Wastestreams
- Table 2 Amos Plant non-CCR Wastestreams
- Table 3 Alternatives for Disposal Capacity
- Table 4 Alternatives Considered for CCR Wastestreams

Appendices

Professional Engineer's Certification

I certify, as a Professional Engineer in the State of West Virginia, that the information in this document was assembled under my direct supervisory control and is accurate as of the date of my signature. This report is not intended or represented to be suitable for reuse without the specific verification or adaptation by the engineer.

DAVID ANTHONY MILLER

Printed Name of Registered Professional Engineer

David truthony Miller **Signature**

WEST VIRGINIA 22663

11.30.2020

Registration No.

Registration State

Date

INTRODUCTION

American Electric Power Service Corporation (AEP) as agent for its affiliate, Appalachian Power Company (APCO), the owner and operator of the Amos Plant, seeks EPA approval under 40 CFR 257.103(f) (1) - *"Development of Alternate Capacity Infeasible"* for the coal combustion residuals (CCR) surface impoundment located at John E. Amos Plant (Putnam County - 1530 Winfield Rd, Winfield, West Virginia). APCO seeks to establish a site-specific compliance deadline to continue to receive CCR wastestreams in the bottom ash pond (BAP) complex until October 31, 2022 while the generating units are converted to dry ash handling. Non-CCR wastestreams will continue to be routed to the unlined BAP complex until October 15, 2023. BAP 1B, Reclaim, Clearwater, and BAP 1A which make up the BAP complex will be sequentially closed by removal and converted to lined wastewater ponds for the non-CCR wastestreams and BAP 1A will be permanently closed. Tankbased systems will provide chemical treatment for the non-CCR wastestreams to assure continued compliance with the requirements of the facility's wastewater discharge permit. Closure of the BAP complex will be completed by February 9, 2024.This document will demonstrate that the CCR and/or non-CCR wastestreams must continue to be managed in the CCR surface impoundments because no alternative disposal capacity is available on or off-site and it is technically infeasible to complete the measures necessary to provide alternative disposal capacity either on-site or off-site by April 11, 2021.

OVERVIEW OF AMOS PLANT AND AFFECTED CCR UNITS

The Amos Plant, located in Putnam County, West Virginia, is bounded by WV Route 817 to the west and the Kanawha River to the east. The plant is approximately five miles southeast of Winfield, West Virginia. The Amos Plant began operations in 1971 as a coal-fired generating power plant with a single 800 megawatt (MW) coal-fired electric generating unit, Amos Unit 1. An additional 800 MW coal-fired unit with the same basic design was added as Unit 2 in 1972, and a 1300 MW coalfired unit was brought online in 1973, resulting in a total plant net generating capacity of 2900 MW. Throughout the life of the generating plant, CCR material (bottom ash) has been generated. To manage the wet bottom ash and other wastewaters generated from the plant, the Amos Plant operates an active CCR surface impoundment called the Bottom Ash Pond (BAP). The BAP is located immediately northwest of the Plant, south and adjacent to Bill's Creek and less than onequarter mile southwest of the Kanawha River. The Amos Plant includes two additional federally regulated CCR Units. These are the closed (inactive) Fly Ash Pond (FAP) and the open (active) Flue Gas Desulfurization (FGD) Landfill (LF). The general site layout can be found in **Figure 1**.

The BAP Complex has two basins that are utilized in alternating fashion, known as BAP 1A and 1B, with one generally receiving CCR and other wastestreams while the other is being cleaned out and solid materials are transported to the landfill. The treated wastewater from BAP 1A and 1B flows through to the Reclaim pond and then to the Clearwater pond. Much of the water in the Reclaim Pond is pumped back to the plant for use. Water that is not pumped back for re-use continues to the Clearwater Pond for eventual discharge to the Kanawha River through Outfall 003, subject to the limitations in the West Virginia National Pollutant Discharge Elimination System (NPDES) Permit No. WV0001074.

The combined surface area of the Amos BAP Complex is approximately 38.5 acres. It was originally constructed as a single pond. The individual basins within the BAP complex were later separated by splitter dikes. All of the basins are assumed to contain more than de minimis amounts of CCR material based on their historic operations, and they have been treated as one CCR unit. The BAP Complex is unlined and was constructed mainly by excavating into clayey silt soil. There is less than 5 feet of separation between the uppermost aquifer and the bottom of a portion of the BAP Complex,

and it must be closed. All CCR material will be removed, and new lined impoundments will be created within the footprint of the 1B, Reclaim, and Clearwater ponds to allow for continued management of non-CCR wastestreams.

Groundwater at the BAP Complex is monitored in accordance with an assessment monitoring program, following the requirements of 40 CFR 257.95 in the CCR rule. There have been no statistically significant levels over groundwater protection standards detected for any constituent at any monitoring well in the unit's groundwater monitoring network. Following the requirements of 40 CFR 257.95, groundwater samples from each monitoring well are analyzed for all parameters in appendix IV of the CCR rule during the first monitoring event of the annual monitoring cycle. During the two subsequent events in the annual cycle, samples from each well are analyzed for all parameters in appendix III and those parameters in appendix IV that were detected during the first sampling event in the cycle. Analysis results for each constituent at each monitoring well are compared to corresponding groundwater protection standards according to statistical procedures and performance standards specified in 40 CFR 257.93(f) and 40 CFR 257.93(g).

SATISFACTION OF THE CRITERIA IN 40 CFR §257.101(f)(1) FOR THE BAP CCR UNIT

WORK PLAN

To demonstrate that the criteria in 40 C.F.R. § 257.103(f)(1)(i) and (ii) have been met, the following is a workplan, consisting of the elements required by \S 257.103(f)(1)(iv)(A). Specifically, this workplan documents that there is no alternative capacity available on or off-site for each of the CCR and/or non-CCR wastestreams that must continue to be managed in the CCR surface impoundment, and discusses the options considered for obtaining alternative disposal capacity. As discussed in more detail below, AEP has elected to convert to dry ash handling at the Amos Plant. The workplan provides a detailed schedule for the conversion project, including a narrative description of the schedule and an update on the progress already made toward obtaining the alternative capacity. In addition, the narrative includes an analysis of the site-specific conditions that led to the decision to convert to dry handling and an analysis of the adverse impact to plant operations if the Amos Plant were no longer able to use the Bottom Ash Pond Complex.

Section One – Narrative Description of How Alternative Capacity will be Developed

From the regulatory text § 257.103(f)(1)(iv)(A)(1)

(1) A written narrative discussing the options considered both on and off-site to obtain alternative capacity for each CCR and/or non-CCR wastestreams, the technical infeasibility of obtaining alternative capacity prior to April 11, 2021, and the option selected and justification for the alternative capacity selected. The narrative must also include all of the following:

(i) An in-depth analysis of the site and any site-specific conditions that led to the decision to select the alternative capacity being developed;

(ii) An analysis of the adverse impact to plant operations if the CCR surface impoundment in question were to no longer be available for use; and

(iii) A detailed explanation and justification for the amount of time being requested and how it is the fastest technically feasible time to complete the development of the alternative capacity.

Existing On and Off-site Disposal Capacity Evaluation

The Amos Plant does not currently have an existing alternate pond that meets the liner requirements of EPA's CCR regulation, and considerable modifications to plant equipment, facilities, and processes will be necessary before the Amos Plant can cease placing CCR and non-CCR wastestreams into the BAP Complex. Likewise, considerable modifications and new equipment would be necessary to transport CCR and non-CCR wastestreams to an off-site disposal facility, if one were available. Currently, no known off-site facilities are available that are capable of processing the wastestreams generated by the Amos Plant.

CCR Wastestreams:

The BAP receives approximately 1.92 million gallons a day (MGD) of sluiced water containing bottom ash.

In terms of on-site alternative disposal capacity; there are no other on-site CCR surface impoundments that are available to dispose of the CCR materials. In order to develop alternate capacity refer to **Table 3** and the timing required to do so; the current approach is the fastest feasible alternative which is to convert all three generating units to dry ash handling and utilize the existing landfill for ash disposal.

Relative to off-site disposal capacity, the effluent limitation guidelines prohibit the disposal of CCR sluice water into public treatment works. Moreover, the sheer volume which will need to be handled on a daily basis makes off-site disposal of wet ash impractical. 1.92MGD of bottom ash sluice flows equates to approximately 7,968 tons per day of sluiced water and would require 398 trucks per day to haul off and dispose. There are currently no facilities to collect and load this wastestream into tankers for transport, and construction of such facilities to manage these flows on a temporary basis would interfere with the activities needed to comply with the new requirements of both the CCR and ELG rules. The increase in traffic associated with such an operation on the plant site poses significant safety risks and is impossible to achieve. The most likely facility type capable of managing industrial wastewaters are publicly-owned or private treatment works, underground injection wells, or publicly available waste management facilities capable of solidifying liquid wastes for disposal in a landfill. Given the volume and characteristics of the CCR wastestream, increases in permitted capacity or other modifications to the permitted pretreatment programs of a public or private wastewater treatment facility would likely be required to manage this flow, if one were available.

AEP evaluated each CCR wastestream placed in the BAP at the Amos Plant. For the reasons discussed above, and in **Table 1** below, bottom ash must continue to be placed in the BAP due to lack of alternative capacity both on and off-site.

Table 1: Amos Plant CCR Wastestreams

Non-CCR Wastestreams:

Approximately 16 to 25 MGD of various non-CCR wastestreams are sent to the BAP Complex. These wastewater streams include cooling tower blowdown, coal pile runoff, fly ash silo sump water, pyrites transfer water, seal trough water, various low volume wastestreams (wash down of the plant areas) to plant drains and sumps, non-chemical metal cleaning wastewaters, landfill leachate, and storm water runoff.

There are no alternate ponds on the site, which includes stormwater ponds in the vicinity, that can accept these wastesteams nor is there infrastructure to deliver the wastestreams to a different location. Re-routing these flows to another on-site pond would decrease the settling time, increase loadings to the ponds, and require permitting equivalent to the permitting required for the selected alternative. The discharge limitations would not be met under these conditions and renders onsite alternatives for disposal as infeasible. Therefore, the existing non-CCR wastestreams need to be discharged to the existing ponds and receive treatment in the current treatment path through the BAP Complex to ensure and maintain compliance with current NPDES permit limits. In addition, once the BAP Complex is closed and converted to lined wastewater ponds the majority of these non-CCR wastesteams will be routed through the new mix tanks to allow for enhanced solids settling.

Relative to off-site disposal capacity and similar to bottom ash; the sheer volume which will need to be handled on a daily basis makes this impractical. During dry weather conditions 16.28 MGD equates to approximately 67,562 tons per day of non-CCR wastestreams and would require 3,378 trucks per day to haul off and dispose of. During storm events non-CCR wastestreams could be as much as 25 MGD. There are currently no facilities to collect and load these wastestreams into tankers for transport, and construction of such facilities to manage these flows on a temporary basis would interfere with the activities needed to comply with the new requirements of both the CCR and ELG rules. The increase in traffic associated with such an operation on the plant site poses significant safety risks and is impossible to achieve. The most likely facility type capable of managing industrial wastewaters are publicly-owned or private treatment works, underground injection wells, or publicly available waste management facilities capable of solidifying liquid wastes for disposal in a landfill. Given the volume and characteristics of the non-CCR wastestreams, increases in permitted capacity or other modifications to the permitted pretreatment programs of a public or private wastewater treatment facility would likely be required to manage this flow, if one were available.

AEP evaluated each non-CCR wastestream placed in the BAP Complex at Amos. For the reasons discussed above, and in **Table 2** below, each of the following non-CCR wastestreams must continue to be placed in the BAP Complex due to lack of alternative capacity both on and off-site.

Non-CCR Wastestream	Average Flow (gpd)	Current Configuration	AEP Notes
Fly Ash Silo Sumps	1,080,000	Flows to the existing BAP	The BAP Complex provides treatment for these non-CCR wastestreams (primarily solids settling) to allow them to meet the NPDES discharge limits and no alternative capacity exists for treatment until the repurposed WWP is completed.
Seal Trough Water (includes Turbine Room Sump)	6,720,000		
Wastewater Sumps	2,840,000		
Cooling Tower Blowdown	5,220,000		The number of trucks per day to transport these wastestreams off- site for disposal was calculated as follows:
Pyrite Transfer Water	380,000		
Quarrier Leachate	40,000		1,080,000 gallons per day * 8.3 pounds per gallon = $8,964,000$ pounds / 2000 pounds per ton = 4,482 tons per day / 20 tons per truck = 224.1 \rightarrow 224 trucks per day
Coal Pile Runoff Amos and PCT, and FGD and Haul Road Runoff	4,030,000 (maximum)		
Storm Water Runoff (contact and noncontact)	5,100,000 (maximum)		
			6,720,000 gallons per day * 8.3 pounds per gallon = $55,776,000$ pounds / 2000 pounds per ton = 27,888 tons per day / 20 tons per truck = 1394.4 \rightarrow 1394 trucks per day
Metal Cleaning Waste	Intermittent		2,840,000 gallons per day * 8.3 pounds per gallon = $23,572,000$ pounds / 2000 pounds per ton = 11,786 tons per day / 20 tons per truck = $589.3 \rightarrow 589$ trucks per day
			5,220,000 gallons per day * 8.3 pounds per gallon = $43,326,000$

Table 2: Amos Plant non-CCR Wastestreams

i) Alternatives for Disposal Capacity

In order to comply with the CCR rule, AEP performed an evaluation (beginning in 2017 and completing in 2018) of alternative disposal capacity options at the Amos Plant for both CCR and non-CCR wastestreams that are managed in the BAP Complex. The evaluation determined the feasibility of options to achieve CCR compliance requirements. Feasible options were evaluated by balancing the technology, performance, schedule duration, other risk factors, and considered potential Effluent Limitation Guidelines (ELG) compliance alternatives.

The options considered for alternative disposal capacity of the wastestreams currently routed to the BAP Complex are summarized in **Table 3** below.

Based on the decision to convert to a dry ash handling system at the Amos Plant, AEP evaluated potential options for compliance with both the CCR and ELG rules as noted in **Table 4** below.

Table 4: Alternatives Considered for CCR Wastestreams

Timeframe for delivering dry ash handling alternatives were determined to be equivalent and not a factor in the final selection.

Based on the evaluation of alternative disposal options, AEP selected the following options for compliance at the Amos Plant:

- Converting from wet bottom ash system to dry handling system, using an under hopper drag chain conveyor (UHDC)
- Closure of the BAP Complex (1A, 1B, Reclaim, and Clearwater Ponds) by CCR material removal.
- Constructing new Wastewater ponds (WWP) within the footprint of the closed BAP 1B, Reclaim, and Clearwater ponds to manage non-CCR wastewaters.

This alternative and strategy can be implemented in the least or equal amount of time of the alternatives and accommodates the unique site features such as quantity of wastestreams, and the lack of off-site disposal facilities. This alternative complies with both the CCR and ELG rules at the Amos Plant.

AEP contracted with Worley to provide engineering, design and procurement services for the selected alternative disposal option. The conceptual design stage of the projects has been completed and includes the following scope:

- Dry Ash Handling System
	- o Installation of an UHDC and associated equipment to collect and dewater bottom ash from Unit 1, Unit 2, and Unit 3.
	- o Installation of a dry pneumatic system and associated equipment on Unit 1 and Unit 2 to convey the economizer ash to the boiler throat just above the ash hopper to then be collected by UHDC system.
	- o Installation of concrete ash bunker on Unit 3 and a common ash bunker for Units 1 and 2 to collect and temporarily store material from the UHDC.
	- o Installation of a sump at ash bunker to collect stormwater and excess quench water and return to ash hopper pit sump.
	- o Material from ash bunker to be hauled to the Amos landfill for disposal or be sold for beneficial reuse.
- Bottom Ash Pond Closure by Removal
	- o All CCR material within the existing BAP Complex will be removed via dewatering and mechanical excavation. All CCR material will either be hauled to the Amos landfill for disposal or be sold for beneficial reuse.
	- o A third-party engineer will certify the removal of CCR upon completion. Certification will be performed in phases across the entire BAP Complex.
	- o After certification of removal of all CCR within a given area of the existing BAP Complex, construction within that area will proceed. A portion of the area within the footprint of the existing BAP Complex will be developed into new Non-CCR

Wastewater Ponds, while the remainder of area will be re-graded and vegetated.

- New Non-CCR Wastewater Ponds
	- o New (9-acre) lined WWP, constructed within the footprint of the existing BAP Complex, to process the non-CCR wastestreams.
	- o New (5-acre) lined Reclaim Pond constructed within the footprint of the existing BAP Complex, to receive effluent from the WWP.
	- o New (2-acre) lined Clearwater Pond, constructed within the footprint of the existing BAP Complex, to receive effluent from the Reclaim Pond. The Clearwater Pond will discharge to the Kanawha River through West Virginia NPDES Permit No. WV0001074 Outfall #003.
	- o Installation of tank-based chemical treatment system with appropriate retention time to provide proper mixing of chemicals to facilitate settling to meet plant discharge requirements.

Appendix A includes a site plan showing the existing and future configurations after rerouting of non-CCR wastewater and removal of CCR from the BAP Complex. The existing and future water balances are included in **Appendix B**.

ii) Impact to Plant Operations if Alternative Capacity Not Obtained

If the Amos Plant were required to immediately cease the placement of CCR and non-CCR wastestreams into the BAP Complex, which is necessary for handling more than 18 MGD of CCR and non-CCR wastestreams, and initiate closure, AEP would have to temporarily or permanently cease power production at the Amos Plant. Idling or closure of the Amos Plant would stop the production of CCR wastestreams and some non-CCR wastestreams, but would not eliminate the need for handling other non-CCR wastestreams, such as coal pile runoff and low volume wastewater from various water collection sumps from around the plant. The BAP is integral in receiving and treating these flows as required to meet the NPDES discharge limits. Therefore, the need for uninterrupted non-CCR wastestream capacity in the BAP Complex will be necessary for a significant amount of time until alternate capacity from the new wastewater ponds is available. Put simply, the BAP will be unable to immediately cease operation even if the Amos Plant immediately discontinued the combustion of coal and production of CCR wastestreams.

The immediate forced cessation of power production at the Amos Plant could cause serious local power delivery constraints and more regional reliability concerns in the affected states. If other coal-fired facilities in these or neighboring states are also forced to cease power production, the consequences could be serious. For example, according to the Energy Information Administration's Electric Power Annual for 2019, coal-fired units provided the following percentages of electricity generation in 2018 and 2019, in the midwestern states where AEP's units operate:

Utility Scale Generation from Coal - 2018[•]

 Data from *Electric Power Annual 201*9, Tables 3.7 and 3.8, Energy Information Administration, eia.gov/electricity/annual/pdf/epa.gov (last referenced October 26, 2020).

Utility Scale Generation from Coal - 2019[•]

 Data from *Electric Power Annual 201*9, Tables 3.7 and 3.8, Energy Information Administration, eia.gov/electricity/annual/pdf/epa.gov (last referenced October 26, 2020).

As shown in these tables, West Virginia in particular is heavily dependent on coal-fired units for the vast majority of electricity produced in the state. Simultaneous immediate closure of a significant portion of the coal-fired capacity in these states could destabilize the electricity grid and would not be in the public's best interest.

iii) Justification for Time Needed to Complete Development of Alternative Capacity Approach

The schedule for developing alternative disposal capacity is described in more detail in Section 3. As the schedule shows, AEP has already undertaken significant planning and implementation steps towards ceasing the receipt of CCR and non-CCR wastestreams within the BAP Complex. Finalization of the both the CCR and ELG rules impacts APCO's ability as a regulated utility to obtain regulatory approval for the required capital expenditures to comply with both rules. This schedule represents the fastest technically feasible timeframe for compliance at the Amos Plant, driven primarily by the need for a major outage on each Unit to allow for removal of the current sluicing equipment and installation of the new UHDC equipment. The Amos Plant serves the PJM interconnection which manages the grid to provide electricity to 13 states and the District of Columbia. Outages are planned in advance with the Regional Transmission Operator (RTO) to effectively manage the generation capacity footprint. The RTO does not typically allow the Amos Plant much flexibility to adjust these outages or perform them in the non-shoulder months (summer and winter) due to the limited generating capacity during these peak electricity usage times and resulting potential impacts to grid stability. The sequencing and final tie-ins associated with this work as described in the work plan in Section 3 further elaborates on the complexities associated with this option. The Units must be converted to dry ash handling in order to cease receipt of CCR wastestreams in the current configuration. The dry ash handling conversion will be worked in parallel with the pond closure, new pond construction, tank based chemical treatment and non-CCR stream reroute construction activities to achieve compliance as soon as possible. The total project duration of approximately 38 months from the date AEP initiated detailed design (August 2020) until the date that CCR sluicing is ceased and alternative capacity is provided for non-CCR wastestreams (October 15, 2023) is less than the average multiple technology system timeline of 39.1 months identified in the EPA Final Part A rule.

Section Two – Visual Timeline Depicting the Steps Necessary to Obtain Alternative Capacity

From the regulatory text § 257.103(f)(1)(iv)(A)(2)

(2) A detailed schedule of the fastest technically feasible time to complete the measures necessary for alternative capacity to be available including a visual timeline representation. The visual timeline must clearly show all of the following:

(i) How each phase and the steps within that phase interact with or are dependent on each other and the other phases;

(ii) All of the steps and phases that can be completed concurrently;

(iii) The total time needed to obtain the alternative capacity and how long each phase and *step within each phase will take; and*

(iv) At a minimum, the following phases: engineering and design, contractor selection, equipment fabrication and delivery, construction, and start up and implementation.

Appendix C contains a timeline that illustrates all relevant phases and details the steps necessary for implementation of obtaining Alternative Capacity.

Section Three – Narrative of the Schedule and Timeline to Obtain Alternative Capacity

From the regulatory text § 257.103(f)(1)(iv)(A)(3). *(3) A narrative discussion of the schedule and visual timeline representation, which must discuss all of the following:*

(i) Why the length of time for each phase and step is needed and a discussion of the tasks that occur during the specific step;

(ii) Why each phase and step shown on the chart must happen in the order it is occurring;

(iii) The tasks that occur during each of the steps within the phase; and

(iv) Anticipated worker schedules;

The schedule for this project is generally broken down into two major scopes of work: Dry Ash Handling (DAH) System installation and Pond Closure / New Pond Construction.

Dry Ash Handling System

Engineering, Design and Procurement (August 2020 – January 2022)

The conceptual design of the new DAH system has been completed. Equipment procurement for the DAH system to support this project is underway with a forecasted delivery date of the major equipment by January 2022. Detailed design of the DAH System has started and is scheduled to be completed by August 2021.

Contractor Selection (May 2021 – June 2022)

There are 6 Construction (Labor) bid packages that are planned to be developed in parallel with the detailed design efforts. The typical timeframe to competitively bid major labor contracts is six months in accordance with AEP's procurement processes. The Civil labor package will be issued for bid in May 2021. For capital improvements of this magnitude, Regulatory approvals from the West Virginia Public Service and Virginia State Corporation Commissions are required. Applications for approval are being prepared and will be submitted by the end of January 2021. Proceedings are estimated to be concluded by July 31, 2021. After receipt of regulatory approval, the Civil labor contract for Unit 3 will be awarded to the selected construction contractors by September 2021 with construction planned to start immediately after. The Structural/Mechanical (S/M) and Electrical, Instrumentation, and Controls (EIC) construction bid packages are planned to be issued in June and July of 2021 and awarded by October and December of 2021. The Civil and S/M packages for Units 1 and 2 are planned to be issued in October and November 2021 with the EIC package planned for February 2022. These packages will be awarded in February, April and June 2022. Construction is planned to start immediately following award of each major labor package.

Construction on Unit 3 (October 2021- May 2022)

The civil work on Unit 3 will include underground utility relocations, excavation and subgrade prep for the ash bunker footings and foundation installation. Once the footings and foundation are poured, the new ash bunker walls will be formed and poured. Similar activities will be performed for the belt transfer conveyor and transfer tower foundations. Soon after the civil work has started the structural/mechanical (S/M) work will start which includes above ground utility relocations inside Unit 3, setting of the transfer tower structural steel, assembly and erection of the belt transfer conveyor that will receive the ash from the UHDC conveyors to discharge into the ash bunker. The ash bunker sump pumps will be set, and piping run back to the ash hopper pit sump. Balance of plant piping such as service water, instrument air, plant air, and other systems will be installed. Building penetrations will be made for the UHDC conveyors. The existing ash hopper pit concrete will be saw cut to make additional space required to route the conveyor out from underneath the ash hopper. During this time as much demolition of existing equipment and structural steel that can be performed ahead of the Unit tie-in outage will be completed which includes reinforcing of the existing ash hopper structural steel to accommodate the new UHDC equipment loads.

The electrical/instrumentation and controls contractor (EIC) will mobilize soon after the S/M contractor to begin above ground utility relocations, installation of conduit and cable tray for both power and control cabling to the new equipment mentioned above. New electrical equipment will be set which includes distributed control system cabinets. Once the conduit and cable tray runs are completed the power and control cabling will be pulled, tested and terminated to the greatest extent possible. A majority of the power feeds and control cables for the UHDC equipment will need to be rolled up and temporarily staged at the ash hopper pit to be completed once the UHDC equipment is erected in place during the tie-in outage.

Tie-in Outages and Concurrent Construction Activities (February 2022 – December 2022)

Although as much work as possible will be performed while the Units are operating, a significant portion of the work to complete the DAH system equipment installation requires a Unit outage. The outage for Unit 3 is planned in the Spring of 2022. Once the Unit comes out of service both the S/M and EIC contractors will work two shifts sixty hours per week to complete the outage related activities. The pulverizer door relocation will begin along with the demolition of boiler down comer piping and any remaining equipment in the ash hopper pit area to allow for installation of the collection and dewatering conveyors. The new ash gate will be installed and the instrumentation and remaining connections trimmed out both electrically and mechanically to complete the UHDC system installation.

Once Unit 3 is substantially complete, startup and commissioning activities will begin as described below. During this time, the civil contractor will have moved to Unit 1 and Unit 2 and started performing similar activities mentioned above with respect to underground utility relocations and installation of the ash bunker, transfer conveyor foundations, and transfer tower foundations. The S/M contractor will follow suit to begin structural steel reinforcing along the Unit 1 and Unit 2 boiler building columns, installing transfer conveyor support steel in various areas along each Unit, setting transfer tower structural steel, erection and assembly of the transfer conveyor from the common ash bunker back towards the Unit 1 boiler. Above ground utility relocations and demolition activities inside each Unit will be going on in parallel as well as installation of balance of plant piping systems. The economizer ash handling system for each Unit will be installed during this time leaving final tie-ins at the economizer ash hopper and the boiler for the tie-in outages. The EIC contractor will also move from Unit 3 to perform similar activities as mentioned above relative to above ground utility relocations, installation of conduit and cable tray, setting of electrical equipment, pulling power and control cabling, testing and terminating.

The 800 MW Units will be removed from service sequentially with a planned 4 week overlap in the Fall of 2022 to complete the UHDC and economizer ash handling system outage related activities and final tie-ins. Contractors will work two shifts sixty hours per week to complete the installation.

All CCR flows to the BAP Complex will completely cease no later than October 31, 2022.

Startup and Implementation

Once substantially complete and each system is turned over by Construction, the AEP startup and commissioning group will begin checkout and functional testing to ensure proper operation. After the commissioning and check out is complete the system will be turned over to plant operations to perform plant testing and checkout and return the Unit back to service.

Bottom Ash Pond Closure/ New Pond Construction

Engineering and Design (August 2020 – July 2021)

Detailed design of the ponds has started and is planned to be completed by July 2021. The design of the ponds includes performing topographic surveys, bathymetric surveys, and geotechnical investigations to understand subgrade materials at the locations of the new ponds. The investigations will also be used to verify CCR depths at certain locations.

Permitting (November 2020 – November 2021)

The regulatory filing process has commenced and is planned to continue through January 2021. Permitting efforts relative to the NPDES, WV Dam Safety, and Putnam County Floodplain permit necessary to construct the ponds have started and are planned to continue through November 2021.

Contractor Selection (April 2021 – December 2021)

There are 3 construction bid packages (labor contracts) that are planned to be developed in parallel with the detailed design efforts. The typical timeframe to competitively bid major labor contracts is six months in accordance with AEP's procurement processes. The first package will be issued for bid in April 2021 with an award date following receipt of regulatory approval from the West Virginia Public Service Commission and Virginia State Corporation Commission anticipated in July 2021. The other construction bid packages are planned to be issued in June and July 2021 and awarded by November and December 2021. Pond construction is planned to start immediately following award.

Construction (August 2021 – September 2024)

The closure of the BAP Complex and construction of the new WWP, Reclaim Pond, and Clearwater Pond requires specific sequencing in order to complete the work due to the fact that the new ponds will be located within the existing BAP Complex footprint and the need to maintain overall pond operations while including provisions to meet the NPDES discharge permit requirements throughout construction. Final completion of the pond closure and construction activities is dependent upon installation of the DAH system equipment and ceasing CCR flows to the BAP Complex. However, steps have been included in the project plan to allow for parallel activities to complete the work as much as possible as shown on the schedule in **Appendix C** and further described in this section.

The BAP Complex as defined by the CCR Unit Boundary is approximately 38.5 acres. Of this, approximately 25 acres is actively used to impound ash (Existing BAP 1A and 1B), 5 acres is an existing Reclaim Pond, 2 acres is an existing Clearwater Pond, and the remaining area is generally higher ground within the overall CCR Unit Boundary, some of which is open and some of which contains miscellaneous plant equipment. The BAP Complex does receive some local stormwater run-off from adjacent areas, but measures will be taken to isolate the work area during each phase from stormwater to minimize impacts to the ongoing closure and construction work. The BAP Complex will be closed by removal of CCR primarily by means of dewatering and mechanical excavation.

The removal of ash will be verified visually. When the removal is complete, the Contractor will remove an additional one foot of material to confirm removal of CCR. Additionally, a third-party engineer will perform quality assurance/quality control (QAQC) services to independently verify that all CCR materials are removed.

The closure by removal will be verified with a minimum of two groundwater sampling events. If the groundwater monitoring concentrations taken during those events do not exceed any groundwater protection standards the BAP Complex will be considered closed.

The pond construction and closure work will be performed in phases across four construction seasons during calendar years 2021-2024. The phases are shown in the timeline in **Appendix C** and timeframes are based on the estimated volumes of material to be removed as well as the estimated earthwork, liner, and protective cover quantities required for pond construction. These durations are based on an average work schedule of five days per week / ten hours per day and do not take into account delays from periods with significant rain events greater than average or normal for the geographical location.

Phase 1 (Ash Pond B Closure and Pond Repurposing) - The mobilization of the final pond construction and closure contract is planned to start in July 2021. Once the contractor mobilizes to begin closing the BAP Complex, the contractor will work to complete early site preparation activities including mobilization, installing erosion control, preparing laydown and construction office areas, diverting wastewater inflows from the initial closure and construction work area, and dewatering the work area in preparation for the first phase of CCR removal.

The first phase CCR removal includes the existing footprint of BAP 1B (where the future WWP will be located) and will be completed in October 2021. Upon certification of closure by removal, construction of the new WWP will proceed. Clean fill will be placed to achieve subgrade elevation from November 2021 through March 2022. In parallel, subgrade prep will be underway for the tank based chemical treatment system and the new liner in the pond. New berms will be installed and will complete in April 2022. The new liner system and protective cover will be installed in April 2022 and complete in June 2022. The construction of the WWP is scheduled for completion in September 2022, which includes the tank-based chemical treatment equipment and rerouting of non-CCR wastewater piping. Startup and commissioning activities associated with the tank-based chemical treatment equipment will also be completed in parallel. During this time all non-CCR wastesteams that are currently routed through the BAP complex will be flowing through BAP 1A, Reclaim, and Clearwater ponds. After the tank based chemical treatment system is installed and commissioned a majority of these non-CCR wastewater streams will be routed through this system which is a key component in the construction execution strategy to allow the Reclaim and Clearwater pond closure and repurposing work to be completed while maintaining compliance with the facility's NPDES permit discharge limits.

Phases 2 and 3 (Reclaim and Clear Water Pond Closure and Repurpose / Ash Pond A Closure) - Closure by removal and new WWP construction in the Reclaim and Clearwater ponds will follow a similar sequence as outlined above for the WWP during the second and third construction seasons (2022 and 2023). It is important to note that during each phase that the non-CCR wastestreams are continuously flowing through BAP 1A and will need to bypass the Reclaim and Clearwater ponds via temporary pumps and piping to complete the closure and repurposing work. As mentioned above the tank based chemical treatment system is a key component to the construction sequencing as a majority of the non-CCR wastewater streams will be routed through this system prior to executing the Reclaim and Clearwater pond closure and repurposing construction work. Once the Reclaim and Clearwater ponds are closed and repurposed as lined wastewater ponds all non-CCR streams will then be flowing through 1B, Reclaim, and Clearwater ponds which in turn allows for BAP 1A closure to commence. Closure by removal of BAP1A will be completed in February 2024, with final filling, grading and stabilization of the permanently closed areas completed in September 2024. The closure by removal will be certified by a third-party engineer and the records will be posted in the operating record and on the AEP CCR website as appropriate.

All Non-CCR streams will be running through newly constructed lined WWPs by October 15, 2023.

At the completion of the CCR material removal and pond construction, the temporary construction facilities, laydown areas, and erosion controls will be removed, and these areas will be restored to their pre-construction conditions.

Section Four – Narrative of the Steps Already Taken to Initiate Closure and Develop Alternative Capacity

From the regulatory text § 257.103(f)(1)(iv)(A)(4).

(4) A narrative discussion of the progress the owner or operator has made to obtain alternative capacity for the CCR and/or non-CCR wastestreams. The narrative must discuss all the steps taken, starting from when the owner or operator initiated the design phase up to the steps occurring when the demonstration is being compiled. It must discuss where the facility currently is on the timeline and the efforts that are currently being undertaken to develop alternative capacity.

AEP has made considerable progress at the time of this request towards creating alternative disposal capacity for the CCR and non-CCR wastestreams at the Amos Plant that are currently managed in the BAP Complex. The following major activities have been completed or are in process:

- Conceptual design for all aspects of the project required to achieve the alternate disposal capacity has been completed and detailed design has commenced.
- Dry bottom ash equipment has been specified and is being procured with equipment delivery scheduled.
- . Contractors have been engaged to discuss different aspects of the work and identify expected construction timeframes.
- Permitting agencies have been engaged to discuss plans.
- Geotechnical investigations required to support the work have been started and are expected to be completed in 2020

NARRATIVE STRATEGY FOR COMPLIANCE WITH ALL REQUIREMENTS OF 40 **CFR 257 SUBPART D**

From the regulatory text 40 CFR \S 257.103(f)(1)(iv)(B)

(B) To demonstrate that the criteria in paragraph (f)(1)(iii) of this section have been met, the owner or operator must submit all of the following:

(1) A certification signed by the owner or operator that the facility is in compliance with all of the requirements of this subpart;

I hereby certify that, based on my inquiry of those persons who are immediately responsible for compliance with environmental regulations for the Amos Plant, the facility is in compliance with all of the requirements contained in 40 CFR 257 Subpart $D -$ Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments.

) avid A. Miller

David A. Miller P.E. Director - Land Environmental and Remediation Services

The Amos Plant is maintaining compliance with all requirements of Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments. Reports documenting compliance with the rule's provisions, such as location restriction, design criteria, operating criteria, and groundwater monitoring are posted to the AEP public CCR Rule Compliance Data and Information Internet site at the following link: https://aep.com/environment/ccr.

40 CFR § 257.103(f)(1)(iv)(B)(2) Visual representation of hydrogeologic information at and around the CCR unit(s) that supports the design, construction and installation of the groundwater monitoring system. This includes all of the following:

(i) Map(s) of groundwater monitoring well locations in relation to the CCR unit(s); (ii) Well construction diagrams and drilling logs for all groundwater monitoring wells; and (iii) Maps that characterize the direction of groundwater flow accounting for seasonal variations;

Groundwater monitoring at the Amos CCR units is accomplished using PE-certified groundwater monitoring networks. The BAP network is comprised of four up-gradient monitoring wells and six Page 17 of 19

11/30/2020

down-gradient monitoring wells. The FAP network is comprised of 5 up-gradient and 10 downgradient monitoring wells. The LF network is composed of 5 up-gradient and 4 down-gradient monitoring wells. The complete Groundwater Monitoring Well Network Evaluation (GWMN) Reports are provided in **Appendix D** and include the following:

- A map showing the location of the PE certified monitoring wells relative to the CCR unit is included in the GWMN report as *Figure 7*
- Boring logs and well construction diagrams are included in the GWMN Report as *Appendix D*
- A typical groundwater flow direction map is included in the GWMN Report as *Figure 6*

Additionally, four groundwater flow direction maps from monitoring events throughout the different seasons to show seasonal changes are provided in the figures section of this submittal as **Figures 2 – 5** for the BAP, **Figures 6 – 9 for the FAP,** and **Figures 10 – 13** for the Landfill**.**

40 CFR § 257.103(f)(1)(iv)(B)(3) Constituent concentrations, summarized in table form, at each groundwater monitoring well monitored during each sampling event;

The most recent Groundwater Monitoring and Corrective Action Reports summarize Appendix III and IV constituent concentrations at each groundwater monitoring well monitored during each sampling event as Table 1 (see **Appendix E**).

40 CFR § 257.103(f)(1)(iv)(B)(4) A description of site hydrogeology including stratigraphic crosssections;

The Site is immediately underlain by Quaternary-aged alluvial deposits consisting of clay, silt, sand, and gravel. While there is a general coarsening downward pattern, the shallower clay matrix is interbedded with silty or sandy layers and the deeper sand matrix is interbedded with silty or clayey layers. The uppermost groundwater zone occurs in the confined to semi-confined deeper sand zones that exhibit a potential head. Maximum alluvium thickness is approximately 50 ft and thins towards the edges of the valley. The Site is adjacent to the Kanawha River, and the ash pond system is located approximately 1,000 ft southwest of the Kanawha River. Bill's Creek, a tributary of the Kanawha River, is immediately adjacent and north of the Reclaim Pond. Groundwater flow direction is generally to the north, northeast, and east towards the Kanawha River and Bill's Creek. The Kanawha River stage level is dam controlled and is a gaining surface water feature. Groundwater elevations on site are higher than the normal stage elevation of the Kanawha River of 566 ft.

Groundwater flow direction within the alluvium is towards the Kanawha River or Bill's Creek. In the upland areas surrounding the Site, bedrock primarily consists of the Pennsylvanian age sandstones, shales, limestones, and coal of the Monongahela and Conemaugh Groups. At higher elevations, the hilltops are capped by the Permian age Dunkard Formation. The Conemaugh Group immediately underlies alluvial sediments at the Site, and gently dips to the north. Groundwater occurrence in the bedrock generally coincides with the stress relief fracture system and is not necessarily related to lithology. Bedrock groundwater flow generally mimics surface topography, flowing from ridges towards valleys.

The complete GWMN Reports for each CCR unit at Amos Plant are provided in **Appendix D** and include a description of site hydrogeology. Stratigraphic cross-sections are included in the GWMN Reports as *Figures 4 – 5C for the BAP, Figures 4 – 6 for the FAP, and Figures 4 – 5B for the LF.*

40 CFR § 257.103(f)(1)(iv)(B)(5) Any corrective measures assessment conducted as required at § 257.96;

The BAP Complex is expected to remain in assessment monitoring until closure by removal is complete. The FAP and LF are in detection monitoring. The CCR units will transition to an assessment of corrective measures and selection of a remedy following requirements in 40 CFR 257.96 and 40 CFR 257.97 and a corrective action program following requirements in 40 CFR 257.98, if necessary.

40 CFR § 257.103(f)(1)(iv)(B)(6) Any progress reports on corrective action remedy selection and design and the report of final remedy selection required at § 257.97(a);

The Amos CCR units have not entered Assessment of Corrective Measures, therefore no progress reports on remedy selection and design and a report of final remedy selection have been required or prepared.

40 CFR § 257.103(f)(1)(iv)(B)(7) The most recent structural stability assessment required at § 257.73(d); and

The most recent structural stability assessment required by § 257.73(d) for the BAP and FAP are included in **Appendix F** and **Appendix H**, respectively. These report will be updated every 5 years as required by the CCR rule.

40 CFR § 257.103(f)(1)(iv)(B)(8) The most recent safety factor assessment required at § 257.73(e).

The most recent safety factor assessment required by § 257.73(e) for the BAP and FAP are included in **Appendix G** and **Appendix H**, respectively. These reports will be updated every 5 years as required by the CCR rule.

CONCLUSION

As set forth and allowed by 40 CFR 257.103 – *Alternative Closure Requirements* and specifically 40 CFR 257.103(f)(1) – *Development of Alternative Capacity is Technically Infeasible,* the Amos Plant qualifies for the site specific alternate time frame provisions for continuing to receive CCR and non-CCR wastestreams and initiate closure of the CCR surface impoundments. Based upon the information submitted, APCO seeks to establish a site-specific compliance deadline to continue to receive CCR wastestreams in the BAP complex until October 31, 2022 and Non-CCR wastestreams until October 15, 2023. All CCR material will be removed from the BAP complex and the BAP will be closed by February 9, 2024.

Figures

Figure 1 – Amos Plant Site Layout Figure 2-5 – Bottom Ash Pond Seasonal Groundwater Flow Direction Figure 6-9 – Fly Ash Pond Seasonal Groundwater Flow Direction Figure 10-13 – John E. Amos Landfill Seasonal Groundwater Flow Direction

AEP Amos Generating Plant - Ash Pond System Winfield, West Virginia **October 2016**

Legend

- \bigoplus Monitoring Well Location
- Groundwater Flow Direction
- Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on October 17, 2016) provided by AEP.

- Groundwater elevation units are feet above mean sea level.

- Site features based on information available in the Ash Pond- CCR Groundwater Monitoring Well Network Evaluation - Amos Plant (Arcadis, 2016) provided by AEP.

Feet

AEP Amos Generating Plant - Ash Pond System Winfield, West Virginia **February 2017**

Legend

- \bigoplus Monitoring Well Location
- Groundwater Flow Direction
- Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on February 7, 2017) provided by AEP.

- Groundwater elevation units are feet above mean sea level.

- Site features based on information available in the Ash Pond- CCR Groundwater Monitoring Well Network Evaluation - Amos Plant (Arcadis, 2016) provided by AEP.

Feet

Legend

- \bigoplus Monitoring Well Location
- Groundwater Flow Direction
- **Groundwater Elevation Contour**

Notes

- Monitoring well coordinates and water level data (collected on April 27, 2018) provided by AEP.

- Groundwater elevation units are feet above mean sea level.

- Site features based on information available in the Ash Pond- CCR Groundwater Monitoring Well Network Evaluation - Amos Plant (Arcadis, 2016) provided by AEP.

Legend

- \bigoplus Monitoring Well Location
- Groundwater Flow Direction
- Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on July 22, 2019) provided by AEP.

- Groundwater elevation units are feet above mean sea level.

- Site features based on information available in the Ash Pond- CCR Groundwater Monitoring Well Network Evaluation - Amos Plant (Arcadis, 2016) provided by AEP.

P:\Projects\AEP\Groundwater Statistical Evaluation - CHA8423\Groundwater Mapping\GIS Files\MXD\Amos\2019\AEP-Amos_FAP_GW_2018-10-22Oct.mxd. ARevezzo. 7/29/2019. CHA8423.

 $\frac{1}{2}$ l N

 \blacksquare _{Feet}

Legend

- ♦ Groundwater Monitoring Well
- \triangle Piezometer
- Groundwater Flow Direction
- Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on December 12, 2016) provided by AEP.

- Potentiometric surface contour interval is 40 feet.
- Topography and drainage system basemap from AEP Drawing No. 13-30500-05-A
- (topographic contour interval: 10 feet).
- Groundwater elevation units are feet above mean sea level.

 $\frac{1}{2}$ l N

 \blacksquare _{Feet}

Legend

- ♦ Groundwater Monitoring Well
- \triangle Piezometer
- Groundwater Flow Direction
- Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on March 13, 2017) provided by AEP.
- Potentiometric surface contour interval is 40 feet.
- Topography and drainage system basemap from AEP Drawing No. 13-30500-05-A
- (topographic contour interval: 10 feet).
- Groundwater elevation units are feet above mean sea level.
$\frac{1}{2}$ l N

 \blacksquare _{Feet}

Legend

- ♦ Groundwater Monitoring Well
- \triangle Piezometer
- Groundwater Flow Direction
- Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on June 10, 2019) provided by AEP.
- Potentiometric surface contour interval is 40 feet.
- Topography and drainage system basemap from AEP Drawing No. 13-30500-05-A
- (topographic contour interval: 10 feet).
- Groundwater elevation units are feet above mean sea level.

 $\frac{1}{2}$ l N

 \blacksquare _{Feet}

Legend

- ♦ Groundwater Monitoring Well
- \triangle Piezometer
- Groundwater Flow Direction
- Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on November 4, 2019) provided by AEP.

- Potentiometric surface contour interval is 40 feet.
- Topography and drainage system basemap from AEP Drawing No. 13-30500-05-A
- (topographic contour interval: 10 feet).
- Groundwater elevation units are feet above mean sea level.

Appendix A

Existing and Future Pond Configurations

I 3
\$\$DESIGN-FILE-NAME\$\$
\$\$\$DATE\$\$\$ \$\$\$\$TIME\$\$\$\$

M

(MIN

5. IT

AT

Appendix B

Existing and Future Water Balances

G (30"x46")

2/4/2020 6:12:04AM

G (30°x46").

2/4/2020 6:12:04AM

Appendix C

Site-Specific Schedule to Obtain Alternative Capacity

Appendix D

Groundwater Monitoring Well Network Evaluation (GWMN) Report

ASH POND-CCR GROUNDWATER MONITORING WELL NETWORK EVALUATION - REVISION 1

Amos Plant Winfield Road Putnam County Winfield, West Virginia

October 22, 2020

ASH POND-CCR GROUNDWATER MONITORING WELL NETWORK EVALUATION - REVISION 1

Everett Fortner III, PG Senior Geologist

Matthew & H

Matthew J. Lamb **Project Manager**

ole

Todd Minehardt, PE Principal Engineer

ASH POND-CCR GROUNDWATER MONITORING WELL NETWORK EVALUATION -REVISION 1

Amos Plant Winfield Road Putnam County Winfield, West Virginia

Prepared for: American Electric Power Service Corporation

Prepared by: Arcadis U.S., Inc. 100 E Campus View Boulevard Suite 230 Columbus Ohio 43235-1447 Tel 614 985 9100 Fax 614 985 9170

Our Ref.: 30060036

Date: October 22, 2020

This document is intended only for the use of the individual or entity for which it was prepared and may contain information that is privileged, confidential and exempt from disclosure under applicable law. Any dissemination, distribution or copying of this document is strictly prohibited.

arcadis.com

https://arcadiso365.sharepoint.com/sites/AEP_US_teamsite/ARCADIS_Only/Amos/BAP/Well Network/Revised-2020-10/Amos-CCR-Ash Pond-Well Network Report-2020-10-22.docx

CONTENTS

TABLES

Table 1. Water Level Data Table 2. Well Construction Details Table 3. Grain Size Analysis Summary Table 4. Hydraulic Testing Results Summary

FIGURES

- Figure 1. Site Location Map
- Figure 2. Plant and CCR Unit Location Map
- Figure 3. Ash Pond System Layout and Well Locations Map
- Figure 4. Cross Section Location Map
- Figure 5A. Cross Section A-A'
- Figure 5B. Cross Section B-B'
- Figure 5C. Cross Section C-C'
- Figure 6. Potentiometric Surface Map, July 25, 2016
- Figure 7. Current Monitoring Well Network Map

APPENDICES

- Appendix A. Boring/Well Construction Logs
- Appendix B. Grain Size Analysis Lab Reports
- Appendix C. Hydraulic Testing Reports
- Appendix D. Field Methodology & Geophysical Investigation
- Appendix E. Record of Changes

ACRONYMS AND ABBREVIATIONS

1 OBJECTIVE

This report was prepared by Arcadis U.S., Inc. (Arcadis) for American Electric Power Service Corporation (AEP) to assess the adequacy of the groundwater monitoring well network included in the Coal Combustion Residual (CCR) requirements, as specified in Code of Federal Regulations (CFR) 40 CFR 257.91, for the ash pond system (CCR Unit) at the AEP Amos Generating Plant (Plant) located on Winfield Road in Winfield, West Virginia (**Figure 1**). This report has been revised to modify the ash pond system boundary from the original report dated October 18, 2016. The CCR requirements include an evaluation of the adequacy of the groundwater monitoring well network to characterize groundwater quality up and down gradient of the CCR unit in the uppermost aquifer and an evaluation of whether the CCR unit meets up to 5 location restrictions. The objective of this report is to present an evaluation of the adequacy of the groundwater monitoring well network in the uppermost aquifer at the onsite ash pond system (Site).

Three regulated CCR units associated with the Plant were identified for review, which include the onsite ash pond system, the offsite flue gas desulfurization (FGD) landfill, and the offsite fly ash pond (FAP) (**Figure 2**). The evaluation of the FGD landfill and FAP are not included in this report and were completed under separate cover.

Initial evaluation of the monitoring well network was completed in November 2015 and included a review of AEP-provided data associated with previously completed subsurface investigation activities in the vicinity of the ash pond system, as well as publicly-available geologic and hydrogeologic data. Gaps in the monitoring well network, as well as in the characterization of subsurface geology, were identified during this initial evaluation. An electrical resistivity geophysical survey was conducted in December 2015, and additional monitoring wells were installed from April through May 2016 to address these data gaps. Drilling activities were performed by AEP personnel with Arcadis personnel completing borehole logging and well installation oversight. The following report presents the current Conceptual Site Model (CSM), combining the historical Site information with collected geologic and hydrogeologic data. This report also includes a description of the uppermost aquifer and the current monitoring well network. The monitoring well network was determined to adequately cover the up and down gradient areas of the ash pond system in the uppermost aquifer; therefore, the report objective has been met.

2 BACKGROUND INFORMATION

The following section provides background information for the AEP Amos Generating Plant ash pond system.

2.1 Facility Location Description

The AEP Amos Generating Plant is located in Putnam County, bounded by U.S. Route 35 to the west and the Kanawha River to the east. The Plant is approximately 5 miles southeast of Winfield, West Virginia. The ash pond system CCR unit is immediately northwest of the Plant. The ash pond system is located south and adjacent to Bill's Creek and less than one quarter mile southwest of the Kanawha River (**Figures 1** and **2**).

2.2 Description of Ash Pond System CCR Unit

The following section will discuss the embankment configuration, area, volume, construction and operational history, and surface water control associated with the ash pond system.

2.2.1 Embankment Configuration

The ash pond system main dike extends 800 feet (ft) along the northwest side of the ash pond system. The maximum height of the dike is approximately 28 ft above ground surface with a minimum crest elevation of approximately 588 ft. Prior to 2010, the minimum crest elevation was 584 ft, however it was heightened to accommodate raising the operating pool level of the ash pond system. The main dike is approximately 10 to 26 ft wide and is primarily constructed of clay/shale fill above native clayey gravel and clay (GA, 2005).

Secondary splitter dikes were constructed that separate the ash pond system into individual ponds including: Bottom Ash Pond (BAP) 1A, BAP 1B, Reclaim Pond, and Clearwater Pond. The splitter dike separating BAP 1A and BAP 1B has a minimum elevation of 585 ft, but is typically greater than 587 ft. The splitter dike separating BAP 1A and the Reclaim Pond has a minimum elevation of approximately 584 ft while the splitter dike separating the Reclaim Pond and the Clearwater Pond has a minimum elevation of approximately 583.5 ft (GA, 2005).

2.2.2 Area/Volume

The ash pond system, consisting of BAP 1A, BAP 1B, Reclaim Pond, and Clearwater Pond occupies a total surface area of approximately 38.5 acres (**Figure 3**). The combined normal reservoir volume of BAP 1A and BAP 1B is 297 acre ft; the combined maximum reservoir volume of BAP 1A and BAP 1B is 312 acre ft (GA, 2008).

https://arcadiso365.sharepoint.com/sites/AEP_US_teamsite/ARCADIS_Only/Amos/BAP/Well Network/Revised-2020-10/Amos-CCR-Ash Pond-Well Network Report-2020-10- 22.docx 2

2.2.3 Construction and Operational History

The AEP Amos Generating Plant began operations in 1971 with Unit 1. Units 2 and 3 were brought online in 1972 and 1973, respectively. The first available design drawings of the ash pond system are dated June 28, 1970. Fly ash and wastewater generated from Units 1, 2 and 3 were assumed to be transferred to the ash pond system as early as 1971 when Unit 1 became active. The ash pond system was constructed by excavation below natural ground surface. From 1970 to 1976 the ash pond system configuration changes included construction of a road embankment on the northwest corner of BAP 1B and removal of an emergency spillway from the northwest corner of BAP 1B. While some modifications to the ash pond system have been made since 1977, the present-day configuration of the ash pond system with respect to splitter dikes and individual pond units has remained the same since 1976 (GA, 2005; **Figure 3**). All ash ponds are unlined (EPRI, 1999). In 2010, the main dike (northwest dike) was raised 5 ft using concrete block filled with compacted soil.

Currently, bottom ash and coal mill rejects from all three generating units are sluiced to the BAP 1A and BAP 1B for settling. The BAPs are filled in an alternating fashion, with one BAP generally receiving bottom ash while the other BAP is being cleaned out. Additionally, wastewaters from the generation building sumps are pumped to BAP 1A and BAP 1B. Finally, Unit 3 coal pulverizer wastewater is pumped to the Pyrites Pond (EPRI, 1999).

2.2.4 Surface Water Control

The perimeter of the ash pond system is graded such that surface runoff is directed away from the ponds. This grading is accomplished by either natural topographic relief or constructed embankments, for example the main dike along the northwest side of ash pond system (GA, 2008). Surface runoff is directed towards storm water ponds, which are unlined and were constructed by excavating into clayey silt soil (EPRI, 1999). The nearest storm water ponds to the ash pond system are located to the southwest and northeast of the system (**Figure 3**).

Surface water flow within the ash pond system is controlled by a series of embankments and splitter dikes. Pond elevations are maintained so that surface water flows via gravity through underground pipes to ponds in the following order: BAP 1A and BAP 1B, Reclaim Pond, and Clearwater Pond (EPRI, 1999). A majority of water in the Reclaim Pond is pumped to the Plant for re-use. Water that is not recycled into the Plant continues to the Clearwater Pond (GA, 2005). From the Clearwater Pond, water flows to the Kanawha River through a National Pollutant Discharge Elimination System permitted outfall via underground piping.

Two spillway pipes are present in the ash pond system (**Figure 3**). These spillway pipes are intended to discharge excess storm flow into Bill's Creek in the event of a large storm event. One spillway pipe is located at BAP 1B, and the other is located at the Reclaim Pond. Both pipes cross the main dike and discharge in the watershed of Bill's Creek.

https://arcadiso365.sharepoint.com/sites/AEP_US_teamsite/ARCADIS_Only/Amos/BAP/Well Network/Revised-2020-10/Amos-CCR-Ash Pond-Well Network Report-2020-10- 22.docx 3

2.3 Previous Investigations

From 1995 through 1998, AEP worked in coordination with Ish, Inc., META Environmental, Inc., HIS GeoTrans, Inc., and Electric Power Research Institute (EPRI) to evaluate groundwater quality associated with a number of AEP power generating facilities, including the Amos Plant. The primary objectives of these site investigations were to characterize hydrogeology and identify potential contaminant source areas, establish existing groundwater quality, and identify constituents that exceeded West Virginia Groundwater Standards (WVGS). These studies are described in detail in the report *Groundwater Quality at the John E. Amos Power Plant, Putnam County, West Virginia* (EPRI, 1999). Field work for these investigations included 41 direct push technology (DPT) groundwater sampling points, installation of 10 permanent monitoring wells (MW-1 through MW-10), surface water sampling from onsite ponds and Bill's Creek, and geotechnical soil characterization.

In 2005, Geo/Environmental Associates, Inc. (GA) performed site investigations at the direction of AEP associated with planned modifications to the main dike. Field methods involved drilling and logging 8 soil borings through the main dike (B-1 through B-8). Split-spoon samples were collected during installation of the borings for the purpose of slope stability analysis, and 3 of the borings were converted to standpipe piezometers (P1, P3, P6). Additionally, boring B-7 was converted to a 2-inch monitoring well, P7 (GA, 2005). This site investigation included numerical hydraulic and slope stability analysis.

The findings of the above-mentioned GA site investigation were submitted to West Virginia Department of Environmental Protection (WVDEP) and were subsequently returned to AEP with comments. This prompted a revision of the hydraulic analyses and construction design specification associated with the plans to raise the elevation of the main dike. No additional field work was performed as part of this scope (GA, 2008).

2.4 Hydrogeologic Setting

The Site is immediately underlain by Quaternary-aged alluvial deposits consisting of clay, silt, sand, and gravel. While there is a general coarsening downward pattern, the shallower clay matrix is interbedded with silty or sandy layers and the deeper sand matrix is interbedded with silty or clayey layers. The uppermost groundwater zone occurs in the confined to semi-confined deeper sand zones that exhibit a potential head. Maximum alluvium thickness is approximately 50 ft and thins towards the edges of the valley. Groundwater flow direction within the alluvium is towards the Kanawha River or Bill's Creek.

In the upland areas surrounding the Site, bedrock primarily consists of the Pennsylvanian age sandstones, shales, limestones, and coal of the Monongahela and Conemaugh Groups. At higher elevations, the hilltops are capped by the Permian age Dunkard Formation. The Conemaugh Group immediately underlies alluvial sediments at the Site, and gently dips to the north. Groundwater occurrence in the bedrock generally coincides with the stress relief fracture system and is not necessarily related to lithology. Bedrock groundwater flow generally mimics surface topography, flowing from ridges towards valleys.

These features are further illustrated on three lines of cross section that were prepared through the ash pond system. The cross section location map is included as **Figure 4** and the lines of cross section are

included as **Figure 5A** (A to A'), **Figure 5B** (B to B'), and **Figure 5C** (C to C'). Boring logs and well construction diagrams are included in **Appendix A**.

2.4.1 Climate and Water Budget

The climate of Winfield, West Virginia is characterized as humid continental with an average rainfall of approximately 40 inches annually. The average maximum temperature is 66 ºF and the average minimum temperature is 44 ºF based on information from Southeast Regional Climate Center (SERCC, 2015).

2.4.2 Regional and Local Geologic Setting

The Site is located in the Appalachian Plateau physiographic province and is also situated in the Kanawha River valley along the southern bank of the Kanawha River. Alluvial sediments consist of clay, silt, sand and gravel deposits that generally coarsen downward. Unconsolidated alluvial sediments are present in thicknesses to approximately 50 ft with thinning towards the valley walls.

Bedrock is present underlying the alluvial deposits, as well as in ridges located to the west of the Site. The primary bedrock units encountered are sedimentary rocks of the Permian age Dunkard Formation and the Pennsylvanian age Monongahela and Conemaugh Formations. The depositional environment for these formations is characterized by a gradually subsiding shallow sea with alternating marine and freshwater strata; the sedimentary units associated with the Monongahela and Conemaugh Formations consists of alternating shale and sandstone units, with occasional thin limestone beds. Several coal horizons are present in the region and often serve as marker beds for unit identification (EPRI, 1999).

Unconsolidated sediments in the upland areas are generally limited to nominal thicknesses of residuum overlying the bedrock. In incised valleys, there is generally a layer of colluvium or alluvium derived from eroded up-valley bedrock on top of the colluvium.

2.4.3 Surface Water and Surface Water/Groundwater Interactions

The Site is adjacent to the Kanawha River, and the ash pond system is located approximately 1,000 ft southwest of the Kanawha River. Bill's Creek, a tributary of the Kanawha River, is immediately adjacent and north of the Reclaim Pond. Groundwater flow direction is generally to the north, northeast, and east towards the Kanawha River and Bill's Creek. The Kanawha River stage level is dam controlled and is a gaining surface water feature. Groundwater elevations on site are higher than the normal stage elevation of the Kanawha River of 566 ft.

The stage levels of the ash pond system are generally maintained no greater than the normal operating levels ranging from 583 to 583.5 ft above mean sea level (amsl) (GA, 2008). Groundwater is generally present at lower elevations at around 570 ft amsl based on 2016 data. The ponds are unlined and likely providing recharge to the uppermost aquifer resulting in groundwater mounding in the vicinity of the ash pond system.

arcadis.com

https://arcadiso365.sharepoint.com/sites/AEP_US_teamsite/ARCADIS_Only/Amos/BAP/Well Network/Revised-2020-10/Amos-CCR-Ash Pond-Well Network Report-2020-10- 22.docx 5

2.4.4 Water Users

The Amos Plant uses Putnam County Public Service Department water supply. There are no active groundwater production wells at the Site. During the development of a water well inventory for the Site by Arcadis in 2014, no information was available regarding the location of nearby public or private water supply wells.

3 GROUNDWATER MONITORING WELL NETWORK EVALUATION

An initial evaluation of the monitoring well network present at the Site was performed in November 2015 to determine if any of the wells were viable for continued use as part of the groundwater monitoring well network or also be retained as part of a larger groundwater hydraulic monitoring well network. As part of this review, hydrogeologic conditions were evaluated to determine if the uppermost aquifer unit had an adequate monitoring well network. The evaluation was completed in accordance with 40 CFR 257.91 to have an established monitoring well network that effectively monitors the uppermost aquifer up gradient and down gradient of the Site. As a result of this evaluation, a geophysical investigation was completed in December 2015 along with installation of additional borings and monitoring wells in April through May 2016. Monitoring wells included in the monitoring network are designated as up or down gradient. Up gradient wells represent background groundwater quality and the down gradient monitoring wells monitor water quality groundwater down gradient of the CCR unit.

3.1 Hydrostratigraphic Units

3.1.1 Horizontal and Vertical Position Relative to CCR Unit

The uppermost unconsolidated aquifer consists of the saturated alluvial sediments beneath and surrounding the Site. The upper limit of the uppermost aquifer is defined by the elevation of the top of the saturated sand zone, which is variable across the Site. The uppermost aquifer is generally confined to semi-confined by clay and sandy clay deposits. However, alluvial sands may be semi-confined to unconfined in some areas of the Site (e.g. SB-1604, MW-1602A). The base elevation of the ash pond system varies, but ranges from approximately 559 ft amsl (SB-1604) to 584 ft amsl (SB-1603). Soil borings installed in 2016 indicate that the base of the ash pond system is in contact with the underlying uppermost aquifer. This is illustrated in cross sections A-A', B-B', and C-C' (**Figures 5A, 5B,** and **5C**).

The vertical extent of the aquifer extends to the base of the unconsolidated deposits in the valley at the bedrock interface. The uppermost unconsolidated aquifer is approximately 50 feet thick and appears laterally extensive to the north, south and east around the ash pond system. The uppermost aquifer pinches out towards the bedrock valley wall to the west.

3.1.2 Overall Flow Conditions

Groundwater recharge occurs from regional precipitation infiltration and from ash pond use. Bedrock, to a lesser extent, contributes recharge to the uppermost unconsolidated aquifer from the west of the Site were the alluvial valley is in contact with the valley wall.

Available groundwater elevations for 1995 through 1996, as well as groundwater elevations collected in July 2016 from installed wells, are summarized on **Table 1**. The average vertical hydraulic gradient from 1995 to 1996 between wells MW-2 and MW-3 was 0.008 in an upward direction from MW-2, which is screened in the shallow sandy clay, to MW-3, which is screened deeper in the basal gravel zone. In July 2016, a similar upward vertical hydraulic gradient of 0.009 was observed. Near the ash pond system, the

average vertical gradient between wells MW-4 and MW-5 from 1995 to 1996 was -0.036 in a downward direction. In July 2016, a similar downward vertical gradient of -0.046 was observed. Both of these wells are screened in the uppermost aquifer (i.e. alluvial sands), indicating likely localized recharge from the ash pond system.

The most recent groundwater data set, collected on July 25, 2016, is depicted with potentiometric surface contours on **Figure 6**. Groundwater flow is generally to the north and east towards the Kanawha River. There is also a northern component of groundwater flow towards Bill's Creek. As presented in **Table 2**, wells included in the monitoring network have been designated as up or down gradient.

3.1.3 Soil Property Testing

During unconsolidated monitoring well installation, selected split-spoon soil samples were retained for particle-size analysis by sieving and hydrometer in accordance with American Society for Testing and Materials (ASTM) D421, D422, and D4718 and moisture content in accordance with ASTM D2216. Split spoon samples selected for particle-size analysis corresponded to the final well screen interval at each boring. For each installed monitoring well location, one composite soil sample was compiled from the selected split spoon samples, which was then transported to the AEP Dolan Civil Engineering Laboratory in Groveport, Ohio for particle-size analysis. The particle-size analysis indicates silty sands and poorly graded sands that make up the alluvial deposits within the screened intervals of the installed monitoring wells in 2016. Note that MW-1603A is installed in a weathered bedrock sequence adjacent to Bill's Creek. The results of this analysis are summarized in **Table 3**, and complete laboratory reports are provided in **Appendix B**.

3.1.4 Hydraulic Conductivity

Pneumatic and bail down slug tests were performed on a total of 2 up gradient wells (MW-1602A, MW-1603A) and 3 down gradient wells (MW-1604, MW-1605, MW-1606) on June 16 and 17, 2016 to provide a broader understanding of the hydraulic conductivity distribution within the alluvial sands (i.e. uppermost aquifer). Well construction details for these wells, as well as all other wells in the monitoring well network, are presented in **Table 2**. Data-logging pressure transducers were used during these tests to monitor and record water level displacement.

Three pneumatic slug tests were performed at each well except MW-1604. Two tests were performed using an identical initial pressure and one test was performed using approximately double the pressure applied in the other two tests. This protocol was implemented to verify the initial head displacement and to evaluate the reproducibility of the results. Equilibration was achieved prior to and after each pneumatic slug test in order to minimize any potential interference between tests. Equilibration was achieved when water level readings stabilized. The pressure applied to each monitor well induced head displacements ranging from approximately 0.5 to 1.5 feet.

At MW-1604, three bail-down slug tests were completed. The pneumatic tests could not be completed due to insufficient initial displacement upon pressurization. Two tests were performed by submerging and removing half the bailer (24-inches) and one test was performed by submerging and removing the entire bailer (48-inches). This protocol was implemented to verify the initial head displacement and to evaluate

the reproducibility of the results. The bailer removal induced head displacements ranging from approximately 1.1 to 2.1 feet.

For each well, one representative test was selected for analysis and analyzed using AQTESOLV® for Windows® Version 4.50 (Duffield, 2007). The hydraulic conductivity values were determined using applicable analytical solutions for a single (partially-penetrating) well under confined or unconfined conditions, as appropriate. Analytical solutions were selected based on the observed response. Results of the slug test analyses are summarized in **Table 4** and solution reports with individual curve matches are provided in **Appendix C.**

The hydraulic conductivity estimates from the five monitoring wells tested ranged from 0.7 ft per day (MW-1605) to 12.5 ft per day (MW-1602A). The overall mean hydraulic conductivity estimate was 6.8 ft per day, while the overall geometric mean was 4.6 ft per day. Estimated hydraulic conductivity values at MW-1602A, MW-1603A, and MW-1606 were consistent with silty sand. The estimated hydraulic conductivity values at MW-1604 and MW-1605 were lower, which is likely due to increased fines associated within the alluvial sand zone.

3.1.5 Geophysical Survey

In order to provide an initial characterization of the ash pond system and the hydrostratigraphic units at the Site, Arcadis completed an electrical resistivity survey from December 8 through December 11, 2015. This geophysical investigation aided in boring/monitoring well placement and provided insight on subsurface conditions between borings. Five total electrical resistivity transects (Line ER-1 through Line ER-5) were performed. Lengths of the resistivity transects ranged from 291 meters (approximately 950 ft.) to 333 meters (1,100 feet). For each survey line, up to 112 non-corrosive stainless-steel electrode stakes were used, which were separated by a distance of 3 meters (approximately 6.6 feet) and inserted into surface soils with an approximate constant spacing along a relatively straight transect. Once the electrical resistivity data set was collected, the data was downloaded for processing. Additional detail of the procedures and results of the electrical resistivity surveys are included in **Appendix D**. The locations of the transect lines are illustrated on **Figure D-1**.

There are three distinct zones of contrasting electrical resistivity apparent on all four resistivity crosssections. As shown in **Figures D-2** through **D-5**, the uppermost resistivity zone is characterized by lower resistivity values (generally 10 to 100 Ohm-meters, shown in blue to green colors) and is interpreted as finer-grained unconsolidated native clay soils, clay fill materials, or fine-grained ash fill deposits. The second resistivity layer is characterized by higher resistivity values (generally 100 to 800 Ohm-meters, shown in green to red colors) and are interpreted as unconsolidated coarser-grained native sand or sand/gravel soils, or sandy fill materials. This coarser-grain layer is consistent with the sand saturated zone and is delineated by black dashed lines in **Figures D-2** through **D-5**. The third resistivity zone is characterized by significantly low resistivity values of less than 10 Ohm-meters (shown as dark blue to white colors). These zones of anomalous low resistivity are not likely due to naturally occurring soils/geologic conditions but are rather interpreted to indicate saturated soils impacted by high concentrations of total dissolved solids in groundwater.

3.2 Uppermost Aquifer

3.2.1 CCR Rule Definition

Per 40 CFR 257.60(a), new CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must be constructed with a base that is located no less than 1.52 meters (5 ft) above the upper limit of the uppermost aquifer, or must demonstrate there will not be an intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high conditions).

The CCR rule definitions for an aquifer and the uppermost aquifer as specified in 40 CFR 257.53 indicates an aquifer is a geologic formation capable of yielding usable quantities of groundwater to wells or springs while an uppermost aquifer is defined as the geologic formation nearest the natural ground surface that is an aquifer, as well as lower aquifers, that are hydraulically interconnected with this aquifer within the facility's property boundary. Upper limit is measured at a point nearest to the natural groundwater surface to which the aquifer rises during the wet season.

3.2.1.1 Common Definitions

An aquifer is commonly defined as a geologic unit that stores and transmits water (readily or at sufficient flow rates) to supply wells and springs (USGS, 2015; Fetter, 2001). The uppermost aquifer is considered the first encountered aquifer nearest to the CCR unit.

3.2.2 Identified Onsite Hydrostratigraphic Unit

The identified Site hydrostratigraphic unit is the unconsolidated alluvial aquifer consisting of confined sands. This aquifer is not known to be used locally for groundwater supply or industrial water use.

3.3 Review of Existing Monitoring Well Network

3.3.1 Overview

Arcadis and AEP personnel visited the Site on August 11, 2015 to review existing well network conditions and locations. The well network that existed at the time of that site visit was deficient, lacking the distribution to accurately represent background water quality and the quality of groundwater passing the waste boundary of the CCR Unit, per 40 CFR 257.91. A well construction table that summarizes the location, ground surface elevation, borehole depth, installation date, and associated well construction details of the monitoring well network is included as **Table 2**. The wells that were not located or abandoned are gray shaded on **Tables 1** and **2** and **Figure 3**.

The groundwater quality monitoring well network monitors the alluvial aquifer consisting of confined to semi-confined sands. It includes 4 wells installed between 1995 and 2005 and 6 wells installed from April to May 2016. An additional 3 wells, which were pre-existing, are utilized only for the purpose of hydraulic monitoring (**Table 2**). Two well pairs, MW-2/MW-3 and MW-4/MW-5 measure vertical flow.

Spatially, the groundwater quality monitoring well network extends as far up gradient to the south as MW-1602A and up gradient along Bill's Creek to the west (MW-1603A). Down gradient, the network extends from immediately down gradient of the ash pond system (MW-4, MW-1604) to the Kanawha River (MW-1605). The current monitoring well network distribution is presented on **Figure 7**.

3.3.2 Gaps in Monitoring Network

As discussed in Section 3.3.1 of this report, gaps in the monitoring network were identified upon initial Arcadis review in 2015. Following a geophysical survey and boring/monitoring well installation described in **Appendix D** of this report, there are no gaps in the monitoring network. The recommended monitoring well network is further described in Section 4.

4 RECOMMENDED MONITORING WELL NETWORK

The groundwater monitoring well network is intended to meet specifications stated in 40 CFR 257.91. The network is discussed with respect to location to the ash pond system (up gradient or down gradient), well depth, and well construction. The recommended existing monitor well network described below will provide an adequate understanding of seasonal and temporal fluctuations in groundwater quality, hydraulics, and groundwater flow in the uppermost aquifer.

4.1 Monitoring Well Network Distribution

A total of 6 monitoring wells were installed to augment the existing network. Specifics on field methodology and other documentation on installation of the additional wells in 2015 and 2016 is provided in **Appendix D**. Monitoring well construction was targeted to monitor the saturated alluvial sands down gradient, which is identified as the uppermost aquifer. Up gradient wells were installed in the upper most alluvial aquifer and weathered bedrock (MW-1603A). The total groundwater quality monitoring network includes 4 up gradient wells and 6 down gradient wells (**Table 2** and **Figure 7**). The monitoring well distribution adequately covers down gradient and up gradient areas as detailed in the following sections. In addition to the 10 groundwater quality wells, 3 wells are used to refine the understanding of groundwater flow and hydraulic gradients in the vicinity of the ash pond system and down gradient at the Plant (**Table 2** and **Figure 7**).

4.1.1 Down Gradient Locations

Down gradient monitoring wells are located to the north and east of the ash pond system. These wells include existing wells MW-1, MW-4, and MW-5, as well as 2016 installed wells MW-1604, MW-1605, and MW-1606 (**Table 2**). These wells monitor groundwater as it flows north and east past the CCR unit boundary.

4.1.2 Up Gradient Locations

Up gradient monitoring wells are located south and west of the ash pond system. These wells include existing well MW-6, as well as 2016 installed wells MW-1601, MW-1602A, and MW-1603A (**Table 2**). These wells establish background groundwater quality up gradient of the CCR unit boundary.

4.2 Well Construction

Monitoring wells in the network are constructed of 2-inch Schedule 40 PVC risers with 5 to 10 ft of 0.01 inch slotted PVC screens, with the exception of MW-1606 which has 15 ft of screen. Installation details and field methods are provided in **Appendix D**. Well construction data for the monitoring well network is summarized on **Table 2**. Boring logs and the monitoring well completion diagrams are provided in **Appendix A**.

ASH POND-CCR GROUNDWATER MONITORING WELL NETWORK EVALUATION - REVISION 1

PROFESSIONAL ENGINEER'S CERTIFICATION 5

I, Todd A. Minehardt, certify that this report was prepared under my direction and supervision, and that the information contained herein is true and accurate to the best of my knowledge. Based on my experience and knowledge of the site, the proposed groundwater monitoring system will be adequate to meet the requirements of 40 CFR Part 257.91.

Todd A. Minehardt

Printed Name of Registered Professional Engineer

Signature

023518

West Virginia

10/22/2020 Date

Registration No.

Registration State

arcadis.com https://arcadiso365.sharepoint.com/sites/AEP_US_teamsite/ARCADIS_Only/Amos/BAP/Well Network/Revised-2020-10/Amos-CCR-Ash Pond-Well Network Report-2020-10- 13 22.docx

6 REFERENCES

- Duffield, G.M. 2007. AQTESOLV® for Windows® 95/98/Mw/NT/2000/XP/Vista, Version 4.50 Professional. HydroSOLVE, Inc.
- Electric Power Research Institute (EPRI). 1999. Groundwater Quality at the John E. Amos Power Plant, Putnam County, West Virginia, Prepared for American Electric Power Service Corp.
- Fetter, Charles Willard, and C. W. Fetter. 2001. Applied Hydrogeology. Vol. 3. No. 3. Upper Saddle River: Prentice Hall.
- Geo/Environmental Associates, Inc. (GA) 2005. Responses to February 15, 2005 DEP Review Letter, John Amos Plant – Bottom Ash Complex, Putnam County, West Virginia, Prepared for AEP Service Corporation.
- Geo/Environmental Associates, Inc. (GA) 2008. Responses to May 12, 2008 DEP Review Letter, John Amos Plant – Bottom Ash Complex, Putnam County, West Virginia, Prepared for AEP Service Corporation.
- Southeast Regional Climate Center. 2015. Historical Climate Summaries, Winfield Locks, West Virginia, http://www.sercc.com, Query conducted by Mr. Josh Roberts of Arcadis on October 6, 2015.
- United States Geological Survey (USGS), Aquifers and Groundwater. 2015. Available online at www.usgs.gov.
- Wilmoth, B.M. 1966. Ground Water in Mason and Putnam Counties, West Virginia, West Virginia Geological and Economic Survey Bulletin 32.

TABLES

Notes:

Shaded - well abandoned or not verified

a. Source: EPRI. April 1999. Groundwater Quality at the John E. Amos Power Plant, Putnam County, West Virginia, Table 2-5.

-- - not measured

amsl - above mean sea level

Elev - elevation

ft - feet

GW - groundwater

Table 2 Well Construction Details AEP Amos Generating Plant - Ash Pond System Winfield, West Virginia

Notes:

Shaded - well abandoned or not verified

Elevation in feet above mean sea level

a. Monitoring well coordinates and elevations were surveyed by AEP in June 2016 (1983 West Virginia State Planar Coordinates, NAVD 88).

b. Well Construction Source: EPRI. April 1999. Groundwater Quality at the John E. Amos Power Plant, Putnam County, West Virginia, Appendix B.

amsl - above mean sea level

bls - below land surface

ft - feet

Table 3 Grain Size Analysis Summary AEP Amos Generating Plant - Ash Pond System Winfield, West Virginia

Note:

USCS - Unified Soil Classification System

Table 4 Hydraulic Testing Results Summary AEP Amos Generating Plant - Ash Pond System Winfield, West Virginia

Notes:

References:

Butler Jr, J.J., 1998. *The design, performance, and analysis of slug tests*. CRC Press.

Hyder, Z, J.J. Butler, Jr., C.D. McElwee and W. Liu, 1994. Slug tests in partially penetrating wells, Water Resources Research, vol. 30, no. 11, pp. 2945-2957.

a. Estimate made from boring logs bgs - below ground surface cm/sec - centimeters per second

ft - feet

USCS - Unified Soil Classification System
FIGURES

ARCADIS

 \bigodot

CROSS SECTION LOCATION MAP

APPENDIX A

Boring/Well Construction Logs

AEP 1995

Soil Boring Logs

MW-01 to MW-10

WATER LEVEL

TIME DATE $\overline{\mathbb{E}}$

JOB NUMBER 5423

COMPANY APPALACHIAN POWER COMPANY PROJECT W. VA. GROUND WATER STUDY

BORING NO. AMW-01 DATE 11/17/95 SHEET 2 OF 2 BORING START 09/05/95 BORING FINISH 09/06/95

JOB NUMBER 5423

f

Ī

 \mathbf{I}

LOG OF BORING JOB NUMBER 5423 COMPANY APPALACHIAN POWER COMPANY PROJECT W. VA. GROUND WATER STUDY COORDINATES N 539,199.9 E 1,732,739.4 GROUND ELEVATION 585.2 SYSTEM STATE PLANE **WATER LEVEL** $\overline{\mathbf{z}}$ 14.5 $\overline{\mathbf{X}}$ $\overline{\mathbf{z}}$ TIME DATE 8-23-95 STANDARD

PENETRATION

PENETRATION

RESISTANCE

RESISTANCE

BLOWS / 6 SAMPLE
NUMBER SAMPLE \mathbf{u} $\boldsymbol{\mathcal{U}}$ **DEPTH** GRAPH
LOG SAMPLE **DEPTH** SOIL / ROCK \mathbf{o} IN IN FEET $\boldsymbol{\mathcal{G}}$ **IDENTIFICATION** FEET **FROM TO** \Box $\overline{\text{ss}}$ $\overline{0.0}$ $\overline{2.0}$ 10-15-18-20 1.6 CLAYEY GRAVEL 30%, 60%, silt 10%, poorly GC 71 graded, v-course angular gravels and pebbles. $\frac{1}{2}$ 2-4 mm, 5yr2\1 mm, dry, no reaction to HCL

DRILLER'S

NOTES

HELL

SOFIEL

DRILLER'S

NOTES

40.0 Top of seal.

 $\left|\cdot\right|$ 42.7 Top of sand.

56.9 Bottom of

57.9 Bottom sand.

screen.

 \cdot Fi

TIEM

KANADIAN SEBAGAI

READER

JOB NUMBER 5423 COMPANY APPALACHIAN POWER COMPANY BORING NO. AMW-03 DATE 11/17/95 SHEET 2 OF PROJECT W. VA. GROUND WATER STUDY BORING START 08/22/95 BORING FINISH 08/23/95 SAMPLE SAMPLE
NUMBER STANDARD 고싮 ROD ≞ ω **DEPTH DEPTH** PENETRATION τ SAMPL GRAPI
LOG \mathbf{o} SOIL / ROCK IN FEET IN Ø. % **IDENTIFICATION** FEET **FROM** نیا ہے TO BLOWS / 6* \Rightarrow α 16 $\overline{\text{ss}}$ 30.0 32.0 $2 - 1 - 1 - 1$ 1.8 CLAYEY SAND Fine sand 1/8-1/4 mm, wet, no lodor. SANDY CLAY 35%, 65%, wet, easy to auger, 17 SS 32.0 34.0 $1 - 1 - 1 - 1$ 2.0 soft, 5yr5\6-5yr6\6. 18 SS 34.0 36.0 $2 - 1 - 1 - 1$ 2.0 5yt516=5yt513 35 SC CLAYEY SAND 50%, 60%, wet, pale brown, 19 SS 36.0 38.0 $2 - 2 - 1 - 1$ 2.0 5YR5\2. $\overline{\text{CL}}$ SANDY CLAY 50%, 50%, <2% silt, v-fine sand 1/8-1/4 mm, sub-angular, well sorted, poorly SS 20 38.0 40.0 $2 - 2 - 3 - 4$ 20 graded, v-loose, wet, faint musky odor, $\overline{\text{CL}}$ (swamp like), 5yr5\2-5yr5\1, no reaction to **HCL** 40 21 SS 40.0 42.0 $2 - 4 - 4 - 4$ 1.6 SANDY CLAY 40%, 60%, <2% silt, well sorted, poorly grade, medium stiff, moist to wet, no odor, no reaction to HCL, easy to auger. **SC** つつ SS 42.0 44.0 $2 - 2 - 4 - 5$ 1.7 Medium dark gray n\4, moist, no odor, CLAYEY SAND 35%, 65%, wet. CLAYEY SAND fine grain 1/8-1/4, wet 23 SS 44.0 46.0 $2 - 4 - 5 - 6$ 1.5 sub-angular, sub-rounded, well sorted, poorly 45 graded,n\5 medium gray, loose, no odor, no reaction to HCL 24 SS 46.0 48.0 $5 - 6 - 8 - 4$ $\bf{.8}$ SP Small wood fragments. SAND Poorly graded, little or no fines, clay 10%, well sorted, medium course sand 1/4-1.0 25 SS 48.0 50.0 $4 - 4 - 12 - 18$ 1.0 mm, wet, 10yr6\2, sub-angular grains, loose, no odor, no reaction to HCL, easy to auger. 50 wood fragments. 26 SS 50.0 52.0 19-19-6-4 1.5 SAND <2%, poorly graded, medium -course SP grain 1/4-1.0 mm, n\5-n\6, medium gray color, angular-sub-angular, very loose, no SS 27 52.0 54.0 8-12-34-17 1.8 odor, wet, well sorted, last .5 small sub-angular gravels. 28 SS 54.0 56.0 7-30-36-34 **GRAVELLY SAND With little fines or no fines.** 1.7 pebbles, a4-6 mm, poorly sorted, poorly 55 字闪 $\overline{\mathsf{GC}}$ graded, pebbles content 10%, loose-medium 29 SS 56.0 58.0 30-33-25-90 \bullet stiff, no odor, wet. 1.8 $\ddot{\bullet}_{\text{p}}$ Sand 60%, gravel 20%, pebbles 20%, 5yr6\1-5yr5\2, wet. Sand 60%, gravel 10%, pebbles 30% CLAYEY GRAVELLY SAND 20%, 30%, 50%. SANDY GRAVELLY CLAY Clay 40%, weathered bedrock, 5yr5\2-5yr5\6, sub-rounded-rounded, gravels and pebbles, hard to auger, refusal.

AIVIERIUAIN ELEUTRIU PUWER SERVIÜE CURPURATION AEP CIVIL ENGINEERING LABORATORY LOG OF BORING

JOB NUMBER 5423

COMPANY APPALACHIAN POWER COMPANY

PROJECT W. VA. GROUND WATER STUDY COORDINATES N 539,605.5 E 1,731,128.7

GROUND ELEVATION 585.7 SYSTEM STATE PLANE

JOB NUMBER 5423

COMPANY _APPALACHIAN POWER COMPANY PROJECT W. VA. GROUND WATER STUDY BORING START 09/07/95 BORING FINISH 09/08/95

BORING NO. AMW-04 DATE 11/17/95 SHEET 2 OF 2

JOB NUMBER 5423

 \mathfrak{t}

JOB NUMBER 5423

COMPANY __ APPALACHIAN POWER COMPANY PROJECT W. VA. GROUND WATER STUDY

BORING NO. AMW-05 DATE 11/17/95 SHEET 2 OF 2 BORING START 08/31/95 BORING FINISH 09/07/95

JOB NUMBER 5423 COMPANY _APPALACHIAN POWER COMPANY

PROJECT W. VA. GROUND WATER STUDY

BORING NO. AMW-06 DATE 11/17/95 SHEET 2 OF 2 BORING START 08/29/95 BORING FINISH 08/30/95

AMERICAN ELECTRIC POWER SERVICE CORPORATION

25

 $\overline{\mathsf{SP}}$

PIEZOMETER TYPE:

WELL TYPE:

TYPE OF CASING USED

RECORDER _DG

26' - 28' LESS THAN 2% SAND

SLOTTED SCREEN, $G = GEONOR$, $P = PNEUMATIC$

5YB4/1 OLIVE GRAY CLEAN SAND, MED

(1/4-1/2 mm) S. ANG. SAND, WELL SORTED, POORLY GRADED, NO ODOR, NO HCI, VERY

Continued Next Page

PT = OPEN TUBE POROUS TIP, SS = OPEN TUBE

OW = OPEN TUBE SLOTTED SCREEN, GM = GEOMON

28.0 Top of screen.

 14 SS

 $\overline{\mathsf{x}}$

 15 SS

26.0

28.0

28.0

30.0

NO-2 ROCK CORE

 $6" \times 3.25$ HSA

 $1 - 1 - 2 - 2$

 $1 - 1 - 2 - 2$

1.67

1.91

 $6⁴$

JOB NUMBER 5423

COMPANY APPALACHIAN POWER COMPANY PROJECT W. VA. GROUND WATER STUDY

BORING NO. AMW-07 DATE 11/17/95 SHEET 2 OF 2 BORING START 08/30/95 BORING FINISH 08/31/95

 Γ

Г

r
T
T
T
T
T
T
T
T
T

┯

<u>a shekara t</u>

COMPANY APPALACHIAN POWER COMPANY PROJECT W. VA. GROUND WATER STUDY COORDINATES N 536,983.3 E 1,734,099.7

GROUND ELEVATION 586.8 SYSTEM STATE PLANE **WATER LEVEL** $|\Sigma|$ 13.5 ¥ $\overline{\mathcal{I}}$ TIME DATE 8-29-95

JOB NUMBER 5423

 \overline{a}

LOG OF BORING

ᅮ

PROJECT W. VA. GROUND WATER STUDY

BORING NO. AMW-09 DATE 11/17/95 SHEET 2 OF $2¹$ BORING START 08/29/95 BORING FINISH 08/29/95

LOG OF BORING

JOB NUMBER 5423

COMPANY _APPALACHIAN POWER COMPANY PROJECT W. VA. GROUND WATER STUDY

BORING NO. **AMW-10** DATE 11/17/95 SHEET 2 OF $\overline{2}$ BORING START 08/24/95 BORING FINISH 08/28/95

AEP 1995

Well Construction Diagrams

MW-01 to MW-10

Geo/Environmental Associates, Inc. 2005

Piezometer Construction Diagrams

P1, P3, & P6

INUVOTU மைப்

 $7 - 5$ PIEZOMETER PG HCM W.O. 90979-059 ASP/ SUMMONY ELEVATIONS MOVEST BOFFAM ASH DAM EVALUATION PROTECT **ESE MOVEM** coonniums 6' west of B-6 **WELL THE** $B-6$ U **ASV. DA TUM ATL** $OP/PC/OS$ SATE MITALEED. mer, DATUM RE GRADE 583 NG TEL N. ARCELETOR DETAILS NOT SHOWN WEITAN **THE STATE** $x + 4$ TOP OF SEAL 10.5 \mathbf{P} TOP OF SACK 13.0 $\left(\begin{matrix} 1 \\ 2 \end{matrix} \right)$ \mathbf{r} **OROUT SEAL** matering Type I Partland Came BEIFFORETZ SEAL MATERIAL: Agences Gold Seal (2) 亀 O $\frac{1}{2}$ (*Palaris*) S SCREEN 010 Slot GRAVEL PACK MATERIAL, Quartz Savel **SOREIGE CLAMENER :** TOP SE 15.0 G # | TERRI ARRO TEREPRO SURTUE OF 25.0 s. **BUTTON OF 15.0 DRAFT** BOTTOM DE 27.0 $\frac{1}{2}$ **BOTTOM OF 270' Property** $\left(\begin{matrix} 0 \\ 0 \end{matrix}\right)$ **GEOTECHNICAL ENGINEERING SECTION** Петинон **OBSERVATION** Ō CTVIL DESIGN STANDARD まだし SIL. . OCENE BIL JACK ARE *ልዮዮ* D. ANERICAN ELECTRIC POWER SERVICE CORR. $0.004 - 0.44$ 201 . GEAL PGIFTY ENGINEER : AMERICAN ELECTRIC POWER BOTTOM ANN DAM EXALUATION PROTECT *<u>Nils Guhl</u>*

H.C. Nutting Company 2005

Test Boring Logs

B-1 to B-8, B-11

Take creation

 $\hat{\mathbf{v}}$

J.

 \sim

à. -1

 $\bar{\mathbf{v}}$

ni.

Æ

 $H - MITTING CD \rightarrow 16147162963$

 $\vert \cdot$

많

AND IN

08/14/2005 23:18 HC NUTTING CO. + 16147162963

 \mathbf{r}

G

ND.055 VOOD

AV.

 \mathbf{I}

 $\big($

23:18 08/14/2005

LYVKH NO.055

ţ.

ţ.

72

Ħ IJ

ļ

┛

 $\pmb{\cdot}$

 $\mathbf I$

۱.

power and contemporary companies

i.

ŀ

ïχ.

al in

 \sim $-$

 \bullet (

 $\frac{1}{2}$

۱.

The Second Property

 \mathbf{v}

2
2

H.C. Nutting Company 2006

Test Boring Logs

B-0601 to B-0610

TEST BORING JOHN AMOS DEWATERING PLANT ACCESS ROAD.GPJ HC NUTTING.GDT 10/25/11

 $\overline{}$

 $\frac{1}{\lambda}$

 $\hat{\boldsymbol{\beta}}$

 $\hat{\boldsymbol{r}}$

 ζ

Arcadis 2016

Soil Boring Logs

MW-1601 to MW-1606, SB-1601 to SB-1607

JOB NUMBER **OH015976.0007**

PROJECT LUINN E. Amos Plant CCR

L.

COMPANY Entertian Electric Power The Result of Boring no. The MM-1601 Boate 2/19/16 Sheet 2 of 2 the Sheet 2 of 2 the Sheet 2 of 2 the Sheet 3 of 2 the Sh

BORING START BORING FINISH **4/25/16 4/26/16**

- AEP.GDT - 7/19/16 15:49 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ AEP - AEP.GDT - 7/19/16 15:49 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJAEP-

JOB NUMBER **OH015976.0007**

American Electric Power

PROJECT LUINN E. Amos Plant CCR

COMPANY Latter that the compare term of the compared term in the company $\frac{1}{2}$ of the company $\frac{3}{2}$

BORING START BORING FINISH **5/25/16 5/25/16**

AEP - AEP. GDT - 7/19/16 15:49 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV. GPJ AEP - AEP.GDT - 7/19/16 15:49 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ

Continued Next Page

JOB NUMBER **OH015976.0007**

L.

COMPANY Entertian Electric Power The Soring No. NW-1602A DATE 1/19/16 SHEET 2 OF 3 **John E. Amos Plant CCR** BORING START PROJECT BORING FINISH **5/25/16 5/25/16**

TIME

JOB NUMBER **OH015976.0007**

PROJECT LUINN E. Amos Plant CCR

COMPANY Entertian Electric Power The Result of Boring no. The MW-1603A DATE The SHEET 2 of 2 the Company Sheet T

BORING START BORING FINISH **5/23/16 5/24/16**

Weathered sandstone (fairly competent) dry with

some moisture (localized).

End of boring at 45.0 feet.

AEP - AEP GDT - 7/19/16 15:49 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ AEP - AEP.GDT - 7/19/16 15:49 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ

43.5

45.0

50-3/0"

15

45

30 | SS | 43

DRILLER'S

TIME DATE

JOB NUMBER **OH015976.0007**

COMPANY **American Electric Power**

L.

COMPANY Entertial metal control to the company of the company $\frac{1}{2}$ of the company $\frac{3}{2}$ of the company $\frac{3}{2}$

AEP - AEP. GDT - 7/19/16 15:49 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ AEP - AEP.GDT - 7/19/16 15:49 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ

John E. Amos Plant CCR BORING START PROJECT BORING FINISH **5/5/16 5/6/16**

 $\vert \circ$

JOB NUMBER **OH015976.0007**

SAMPLE

PROJECT LUINN E. Amos Plant CCR

STANDARD

COMPANY Entertial State of the CRING NO. Note that the DATE Triples of the SHEET In State of the SHEET In State of the BORING START BORING FINISH **5/5/16 5/6/16**

JOB NUMBER **OH015976.0007**

American Electric Power

PROJECT LUINN E. Amos Plant CCR

DATE **MW-1605** OF COMPANY **3 2** BORING NO. **7/19/16** SHEET

BORING START BORING FINISH **4/29/16 5/2/16**

- AEP.GDT - 7/19/16 15:49 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ AEP - AEP.GDT - 7/19/16 15:49 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJAEP.

45.0

46.5

8-4-6/0"

10

SS

31

Continued Next Page

shoe, small gravel sized, very soft rock,

subangular at 44.7 feet.

JOB NUMBER **OH015976.0007**

COMPANY Entertial State of the CRING NO. And the Secondany Structure of the Structure of the Structure of the S

PROJECT LUIDING **E. Amos Plant CCR And All Communist Boring Start Al 29/16** \blacksquare **boring finish 5/2/16** \blacksquare

 \mathbb{R}^2

JOB NUMBER **OH015976.0007**

American Electric Power

SAMPLE

PROJECT LUINN E. Amos Plant CCR

BORING START 5/2/16

Note: trace medium sand (5-7%), slight color change to 10YR 5/8 from 42.8 to 43.5 feet.

Note: 0.3" layer of little amount of coal bits ranging in size from fine to coarse, fine-little medium coarse sand at 44.25 feet.

- AEP.GDT - 7/19/16 15:50 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ AEP - AEP.GDT - 7/19/16 15:50 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ

43.5

45.0

3-3-6/0"

13.5

16

45

3-4-9/0"

46.5

SS

30

31

AEP.

SS

45.0

Continued Next Page

DATE **MW-1606** OF COMPANY **3 2** BORING NO. **7/19/16** SHEET LOG OF BORING

JOB NUMBER **OH015976.0007**

LOG OF BORING

COMPANY Entertian Electric Power The Soring No. NW-1606 DATE 2019/16 SHEET 2 OF 3 American Electric Power State S **John E. Amos Plant CCR** BORING START PROJECT BORING FINISH **5/2/16 5/3/16** $\overline{}$

 $\overline{}$

LOG OF BORING

JOB NUMBER **OH015976.0007**

COMPANY **American Electric Power**

L.

COMPANY Entertial metal control to the company of the company $\frac{1}{2}$ of the company $\frac{3}{2}$ of the company $\frac{3}{2}$

John E. Amos Plant CCR BORING START PROJECT BORING FINISH **4/25/16 4/26/16**

Continued Next Page

AEP - AEP. GDT - 7/19/16 15:50 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ AEP - AEP.GDT - 7/19/16 15:50 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ

JOB NUMBER **OH015976.0007**

 \mathbb{R}^2

COMPANY Entertial State of the CRING NO. St. 1601 Terms of the Step of the Step of the Step of the Step of the S

John E. Amos Plant CCR BORING START PROJECT BORING FINISH **4/25/16 4/26/16**

JOB NUMBER **OH015976.0007**

COMPANY **American Electric Power**

L.

COMPANY Entertial metal control to the company of the company $\frac{1}{2}$ of the company $\frac{3}{2}$ of the company $\frac{3}{2}$

John E. Amos Plant CCR BORING START PROJECT BORING FINISH **4/26/16 4/27/16**

Continued Next Page

AEP - AEP. GDT - 7/19/16 15:50 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ AEP - AEP.GDT - 7/19/16 15:50 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ

JOB NUMBER **OH015976.0007**

 \mathbb{R}^2

COMPANY Entertial Contract Contract Tower Teach Contract Section Description of the SHEET $\overline{3}$ of $\overline{3}$ $\overline{3}$

John E. Amos Plant CCR BORING START PROJECT BORING FINISH **4/26/16 4/27/16**

L.

JOB NUMBER **OH015976.0007**

COMPANY **American Electric Power**

DATE **SB-1603** OF COMPANY **3 2** BORING NO. **7/19/16** SHEET

John E. Amos Plant CCR BORING START PROJECT BORING FINISH **4/27/16 4/28/16**

Continued Next Page

AEP - AEP GDT - 7/19/16 15:50 - C:WSERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ AEP - AEP.GDT - 7/19/16 15:50 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ

JOB NUMBER **OH015976.0007**

COMPANY Entertial Contract Contract Tower Teach Contract Section Secti

John E. Amos Plant CCR BORING START PROJECT BORING FINISH **4/27/16 4/28/16**

 \mathbb{R}^2

AEP - AEP.GDT - 7/19/16 15:50 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ AEP - AEP.GDT - 7/19/16 15:50 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ

JOB NUMBER **OH015976.0007**

American Electric Power

 \mathbf{r}

COMPANY Entertial metal control to the company of the company $\frac{1}{2}$ of the company $\frac{3}{2}$ of the company $\frac{3}{2}$

John E. Amos Plant CCR BORING START PROJECT BORING FINISH **4/28/16 4/29/16**

Continued Next Page

JOB NUMBER **OH015976.0007**

L.

John E. Amos Plant CCR BORING START PROJECT BORING FINISH **4/28/16 4/29/16**

SB-1604 COMPANY **3 American Electric Power BORING NO. <u>SB-1604 </u> DATE <u>7/19/16 </u> SHEET <u>_ 3</u>**

DATE **7/19/16** SHEET **3** OF __

LOG OF BORING JOB NUMBER **OH015976.0007** COMPANY Entertial State of the CRING NO. St. 1605 Terms of the Sheet the OF the State of the PROJECT LUINN E. Amos Plant CCR BORING START BORING FINISH **4/29/16 5/2/16** WELL TYPE COORDINATES PIEZOMETER TYPE **NA NA** GROUND ELEVATION SYSTEM HGT. RISER ABOVE GROUND **NA** dia <mark>NA</mark> DEPTH TO TOP OF WELL SCREEN MA BOTTOM NA **17.8** \blacktriangledown \blacktriangledown Water Level, ft WELL DEVELOPMENT **NA EXECUTE BACKFILL NA** TIME FIELD PARTY **NA** RIG **Hollow Stem Auger 2" 5/2/2016** DATE TOTAL
LENGTH
RECOVERY SAMPLE **STANDARD** RQD DEPTH SAMPLE
NUMBER **GRAPHIC
LOG
USCS** NUMBER SAMPLE TOTAL
LENGTH
CENGTH
CENGTH $\begin{array}{c} 106 \\ 150 \\ -150 \end{array}$ DEPTH **PENETRATION** SOIL / ROCK DRILLER'S WELL IN IN FEET RESISTANCE % IDENTIFICATION **NOTES** FEET FROM TO BLOWS / 6" 0.0 1.5 1 SS 0 SM | Sandy silt, little fine sand, trace medium sand, moist, wet, very soft, brown, no dilatancy (7YR 5/6). 2 SS 1.5 3.0 1-1-0/0" 3 Note: trace coarse angular sand, very wet from 1.5 to 3.0 feet. 3.0 4.5 1-1-2/0" 7.5 Road base fill, limestone, small/medium gravel 3 SS 3 (7YR 4/6). SM $\mid\,$ Silt, some fine sand, moist, medium stiff, 4 SS 4.5 6.0 6-6-8/0" 11.5 brow/dark brown, no dilatancy, low plasticity (7YR 5 4/6). Note: layer of black/dark brown 7YR from 4.2 to 4.4 feet. SS 6.0 8-4-2/0" 12 5 7.5 **SM** Note: color change to gray at 5.5 feet. Silt, trace fine sand, stiff, low plasticity, no dilatancy, gray mottling, moist (7YR 4/6). 6 SS 7.5 9.0 3-7-9/0" 14.5 7 SS 9.0 10.5 8-6-9/0" $\mathfrak{2}$ Note: color shift to 2.54 at 9.22 feet and gray fine sand veins (5%). 10 10.5 12.0 2-3-5/0" 15 8 SS | 10 12.0 13.5 3-4-5/0" 21 Note: lower recovery, rock jammed shoe from 9 SS | 12 12.0 to 13.5 feet. 10 SS 13.5 15.0 3-3-4/0" 1.5 Note: higher moisture content from 14.5 to 15.0 feet. 15 11 SS 15.0 16.5 5-2-3/0" 10 ML Silt, trace fine sand, stiff, brown, moist, low plasticity, no dilatancy ((Gley 1 4/10Y). Note: color change to 10YR 5/6, higher moisture content and little fine sand from 15.6 to 15.9 feet. 16.5 18.0 3-2-3/0" 18 12 | SS | 16 $\sqrt{2}$ Note: wet at 17.75 feet. 18.0 19.5 2-2-2/0" 18 13 | SS | 18 14 SS 19.5 21.0 4-2-2/0" 14.5 **TYPE OF CASING USED** *Continued Next Page* NQ-2 ROCK CORE PT = OPEN TUBE POROUS TIP, SS = OPEN TUBE PIEZOMETER TYPE: 6" x 3.25 HSA SLOTTED SCREEN, G = GEONOR, P = PNEUMATIC 9" x 6.25 HSA HW CASING ADVANCER \mathbf{A} " WELL TYPE: $\,$ OW = OPEN TUBE SLOTTED SCREEN, GM = GEOMON 3" NW CASING SW CASING 6" RECORDER T. Runge

- C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ AEP - AEP.GDT - 7/19/16 15:50 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ $-7/19/16$ 15:50 GDT. AEP. Ê

AIR HAMMER

8"

JOB NUMBER **OH015976.0007**

American Electric Power

PROJECT LUINN E. Amos Plant CCR

COMPANY Entertial metal control to the company of the company $\frac{1}{2}$ of $\frac{3}{2}$ or $\frac{3}{2}$ or $\frac{3}{2}$ or $\frac{3}{2}$ or $\frac{3}{2}$ or $\frac{$

BORING START BORING FINISH **4/29/16 5/2/16**

31 | SS | 45.0 | 46.5 |

Continued Next Page

3%), wet, brown/gray, soft to medium stiff, rapid

JOB NUMBER **OH015976.0007**

 \mathbb{R}^2

COMPANY Entertial State of the CRING NO. St. 1605 Terms of the Sheet 2. Of the State of the State of the State o

PROJECT LUIDING **E. Amos Plant CCR And All Communist Boring Start Al 29/16** \blacksquare **boring finish 5/2/16** \blacksquare

 $\overline{}$

 $\overline{8"}$

<u>AIR HAMMER____</u>

JOB NUMBER **OH015976.0007**

COMPANY **American Electric Power**

L.

DATE **SB-1606** OF COMPANY **3 2** BORING NO. **7/19/16** SHEET

John E. Amos Plant CCR BORING START PROJECT BORING FINISH **5/11/16 5/12/16**

Continued Next Page

SBREWER\DOCLIMENTS\AFP\AFP WINFIFI D WV GP-I C.\USFRS\ $15.50 -$ 7/19/16 $\frac{1}{2}$ -AEP AEP.

JOB NUMBER **OH015976.0007**

L.

COMPANY Entertial State of the CRING NO. St. 1606 Tannel Date Times of the Sheet Internal State of the St

John E. Amos Plant CCR BORING START PROJECT BORING FINISH **5/11/16 5/12/16**

JOB NUMBER **OH015976.0007**

COMPANY **American Electric Power**

 \mathbb{R}^2

COMPANY Entertial metal control to the company of the company $\frac{1}{2}$ of the company $\frac{3}{2}$ of the company $\frac{3}{2}$

John E. Amos Plant CCR BORING START PROJECT BORING FINISH **4/27/16 4/28/16**

Continued Next Page

AEP - AEP GDT - 7/19/16 15:50 - C:WSERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ AEP - AEP.GDT - 7/19/16 15:50 - C:\USERS\SBREWER\DOCUMENTS\AEP\AEP WINFIELD WV.GPJ

JOB NUMBER **OH015976.0007**

 \mathbb{R}^2

COMPANY Entertial State of the CRING NO. State of the Section State of the Stat

John E. Amos Plant CCR BORING START PROJECT BORING FINISH **4/27/16 4/28/16**

Arcadis 2016

Well Construction Diagrams

MW-1601 to MW-1606

WELL CONSTRUCTION LOG

APPENDIX B

Grain Size Analysis Lab Reports

APPENDIX C

Hydraulic Testing Reports

APPENDIX D

Field Methodology and Geophysical Investigation

APPENDIX D

FIELD METHODOLOGY AND GEOPHYSICAL INVESTIGATION

Based on the recommended well network modifications, the following generalized tasks were completed:

- Installation and development of 6 new monitoring wells
- Installation of 6 confirmatory soil borings
- Redevelopment and repair of 8 existing monitoring wells
- Electrical resistivity survey of ash pond system

Field activities began with the electrical resistivity survey, performed by Arcadis from December 7 to December 11, 2016. Utility clearance activities were conducted from April 4 to April 6, 2016 in preparation for well installation. Arcadis provided oversight for the installation of 6 monitoring wells by an AEP drilling crew, which began on April 25, 2016 and ended on May 26, 2016. Well development activities began on May 17, 2016 and were completed on June 15, 2016. The following sections provide detail on methodology for each component of field activities.

Staking, Surveying, and Utilities Clearance

All proposed new monitoring well locations were staked by an AEP surveyor prior to drilling. AEP surveyed the spatial northing and easting coordinates as well as the ground surface elevation of each staked monitoring well location prior to drilling. The accuracy of elevation measurements was at least to the nearest 0.01 foot. An Arcadis representative contacted 8-1-1 to assess the presence of underground utilities near the new monitoring well and boring locations prior to drilling activities. AEP completed a plant dig permit, which identified private plant utilities near the new monitoring well and borings locations. Arcadis retained the services of a utility locating subcontractor to perform a geophysical survey (e.g. ground penetrating radar, electromagnetic survey, etc.) over an area of 25 feet by 25 to locate utilities at each new monitoring well location. An Arcadis representative will completed a visual inspection of the proposed well sites prior to drilling to assess the presence of any previously unidentified subsurface utilities. Prior to drilling, the new monitoring well locations were soft cleared using hand augering or air knife techniques to a diameter at least 10 percent larger than the largest diameter tooling to be used during drilling. Soft digging was completed to a minimum depth of 5 feet below ground surface (bgs).

Decontamination

All down-hole tools or equipment were decontaminated in accordance with ASTM D5088 prior to the start of drilling and between each borehole location. At a minimum, the tooling was washed with detergent solution followed by a potable water rinse within the decontamination pad. The use of a pressure washer was used when possible. A decontamination was constructed for decontamination of the down-hole tools. The decontamination pad was constructed at a location near the existing AEP Amos Plant ash ponds in a manner such that all decontamination water would flow to the existing ash pond system. Containerization was not required for decontamination water, if directed to the ash pond system. Water for decontamination or drilling was potable and obtained from the AEP Amos Plant.

Drilling – New Unconsolidated Monitoring Wells

Boreholes for unconsolidated monitoring wells were drilled using standard hollow-stem auger methods in accordance with ASTM D5784. Augers with a hollow-stem inside diameter of 4 and ¼ inches were used to drill and install the unconsolidated monitoring wells. Continuous spit-spoon sampling and standard penetration testing was performed in accordance with ASTM D1586 to the total boring depth. An Arcadis representative logged, classified, and recorded all samples in accordance with ASTM D5434 and D2488. No petroleum based lubricants or other VOC based liquids were used on down-hole tools.

Drilling – Confirmatory Soil Borings

Six boreholes to verify depth of ash were drilled using standard hollow-stem auger methods in accordance with ASTM D5784. Augers with a hollow-stem inside diameter of 4 and 1/4 inches were used to drill and install the boreholes. Continuous spit-spoon sampling and standard penetration testing was performed in accordance with ASTM D1586 to the total boring depth. All borings were backfilled upon completion. Borings deeper than 20 feet were tremmie grouted using Benseal or equivalent bentonite grout. Borings less than 20 feet were backfilled with drill cuttings, provided drill cuttings did not show visual signs of potential impact. An Arcadis representative logged, classified, and recorded all samples in accordance with ASTM D5434 and D2488 using USCS classification. Soil boring logs are included in **Appendix A**. No petroleum based lubricants or other VOC based liquids will be used on down-hole tools.

Geologic Sample Analysis

An Arcadis representative retained selected split-spoon soil samples from the unconsolidated monitoring well locations for particle-size analysis by sieving and hydrometer in accordance with ASTM D421, D422, and D4718 and moisture content in accordance with ASTM D2216. Split spoon samples selected for particle-size analysis corresponded to the final screened interval for the given unconsolidated monitoring well. For each new monitoring well location, the selected split spoon samples from the screened interval were composited into a single 16-ounce glass sample container, which was appropriately labeled according to the monitoring well identification number. Samples were transported to the AEP Dolan Civil Engineering Laboratory in Groveport, Ohio for particle-size analysis.

New Monitoring Well Construction

All monitoring wells were constructed with 2-inch nominal diameter casing consisting of schedule 40 PVC pipe extending 3.0 feet above ground surface. All wells were constructed with 10-slot, schedule 40 PVC well screen. All monitoring wells used a primary filter pack consisting of a Global No. 5 to No. 7 brand or equivalent sand based on field observations. The filter pack was placed in the annular space between the borehole and the screened interval, extending from 1.0 feet below the bottom of the screen to 3.0 feet above the top of the screen. A secondary filter pack consisting of Global No. 6 or No. 7 brand sand or equivalent was placed in all wells. The secondary filter pack was placed in the annulus, extending from the top of the primary filter pack to 1.0 feet above the primary filter pack. Final placement of the primary and secondary filter packs were modified at some wells based on field conditions. Complete well construction details are provided in **Appendix A**. If backfilling of the borehole was necessary to set the monitoring well, the backfill consisted of bentonite pellets. A minimum of one foot of filter sand separated the bottom of the well screen and the backfill material.

A bentonite pellet seal was placed in the annulus immediately above the secondary filter pack in all monitoring wells. The bentonite pellet seal extended from the top of the secondary filter pack to at least 3.0 feet above the top of the secondary filter pack, which was below the water table. The bentonite pellet seal was allowed to hydrate for two hours prior to placing the overlying grout. A high-solids bentonite grout was placed using a tremmie pipe in the remaining annulus to near ground surface. The high-solids bentonite grout consisted of bentonite grout and water mixture with a minimum of 20 percent solids, mixed and placed in accordance with the manufacturer's written instructions (i.e. 66.75 lbs of grout to 40 gallons of water for Halliburton quick grout). Placement of bentonite grout was done in a controlled manner so as not to contaminate the well.

Lockable steel protective casings were installed over the PVC casings in accordance with ASTM D5787. The protective casing was at least 2 inches in diameter greater than the PVC casing above grade and was centered in a concrete pad measuring 4 feet by 4 feet and 6-inches thick. The steel outer casing was 3 inches in diameter greater than the well casing (5-inches) and extended 4 feet below the ground surface and at least 2 feet above the ground surface. There were no signs of grout or concrete on the steel protective casing. The concrete pad was constructed so that there is slope away from the protective casing. Two weep holes were drilled on opposite sides at the base of the protective cap. The annular space between the PVC casing above grade and the steel protective casing was filled with washed pea gravel up to 4 inches below the top of the PVC casing. A watertight locking well cap was placed at the top of the PVC casing. A minimum of four concrete-filled barrier posts/bollards were installed around monitoring wells located in high-traffic areas to protect the monitoring wells from damage. The barrier posts were installed either at each corner of the pad or the midpoint of each side of the pad. The barrier posts were painted a high-visibility yellow color. An Arcadis representative produced a typed log of geologic materials encountered and of borehole and monitoring well construction details. A log was also filed with the West Virginia Department of Environmental Protection (WVDEP) in accordance with their recordkeeping requirements.

Monitoring Well Development

Well development was completed at all newly-installed wells, as well as existing wells to be retained in the monitoring well network. At existing wells, the well screens and casings were brushed using a tight fitting brush to dislodge encrusted materials prior to beginning the surge and pump cycles described below. The well was then purged with a pump or by air-lifting to remove dislodged material from the well. Well development at new wells was performed a minimum of 48 hours after the completion of well construction. The static water level was measured in the well prior to initiation of development. All wells were developed through a pump and surge method in accordance with West Virginia Department of Environmental Protection Title 47 Series 60 Monitoring Well Design Standards dated June 21, 2011. The well was initially purged with a pump to remove loose material and fines from the well. A surge cycle was then be performed across the screen using a surge block. A second pumping cycle shall be performed until the discharge water has good visual clarity, followed by second surge cycle with the double disk surge block.

A final pumping cycle was performed to the following criteria: 1) a minimum of 10 casing volumes were purged from the well, and 2) field water quality parameters including temperature, pH, conductivity, oxidation-reduction potential, and turbidity were stable within applicable criteria (temperature stabilizes

within ±0.50C, pH stabilizes within ±0.2 units, conductivity stabilizes within ±3 percent, and turbidity is less than 10 nephelometric turbidity units). Well development logs are included as an attachment to **Appendix D**.

Monitoring Well Restoration

Surface completions (e.g. concrete pads, steel protective casings) of existing wells that were to be retained in the monitoring well network were inspected by Arcadis personnel. If the surface completions were not in good condition as described above in the Monitoring Well Construction section, then actions were taken to improve the deficiencies and to be consistent with new monitor well construction.

FIELD METHODOLOGY – ELECTRICAL RESISTIVITY SURVEY

Electrical Resistivity Method

The electrical resistivity method consists of injecting electrical current into the subsurface and simultaneously measuring the potential difference along the subsurface within the vicinity of where the current is being injected using a series of electrodes at the ground surface - generally two current electrodes and two potential electrodes in various arrangements and separations called arrays. The injected current and measured potential values are quantified and recorded by the instrument. From these data the electrical resistance (in Ohms) is calculated using Ohm's Law (R = V/I). The apparent electrical resistivity (in Ohm-meters) is calculated from the resistance using volumetric geometrical scale factors related to the electrode arrangement (array). These geometric factors are what distinguish the various array types. The horizontal and vertical sensitivities, as well as the penetration ability vary between array types, and the array type choice is dependent on the project objectives. For this project, a dipole-dipole array was selected as a suitable option. This array type offers rapid data acquisition, a data-dense profile, good subsurface penetration, high data collection efficiency, and good sensitivity to both lateral and vertical variations in electrical resistivity.

Electrical resistivity is an intrinsic property of materials that varies widely in the subsurface and is often correlative with lithology and geochemistry. For soils and rock, resistivity is a function of porosity, ionic content of the pore fluids (usually groundwater), and electrically conductive/reactive minerals such as pyrite and some clay minerals. By measuring the distribution of resistivity values in the subsurface, the presence and structure of geologic features can be inferred.

Once the electrical resistivity data set was collected, the data is downloaded to a computer for processing. Since the true resistivity structure of the earth is the desired outcome, the apparent resistivity data were inverse-modeled using the software Earth Imager v 2.42 to obtain true resistivity¹ cross-sections of the subsurface.

-

¹ The terms apparent versus true resistivity refers to whether the value is essentially a vertical average of the measured quantity, represented as an apparently equivalent uniform value, or whether the values are a portrayal of the actual resistivity or conductivity of the earth materials.

Data Acquisition Procedures

For the 2-dimensional (2D) ER survey conducted at the AEP Amos Plant, five ER transect lines ranging from 291 meters (approximately 950 ft.) to 333 meters (1,100 feet) long were installed to assess the ash pond system area (**Figure D-1**). The lines were identified as Line ER-1, Line ER-2, Line ER-3, Line ER-4, and Line ER-5. For each survey line, up to 112 non-corrosive stainless-steel electrode stakes were used, which were separated by a distance of three meters (approximately 6.6 feet), and inserted into surface soils with an approximate constant spacing along a relatively straight transect. The electrode stakes penetrated the subsurface from approximately 4 to 6 inches bgs to make electrical contact with the soil. The electrode stakes were connected to a specially designed cable that allowed contact with various combinations of electrodes from the meter controlling the data collection process. During the survey, current was injected into the subsurface through two of the electrodes and the potential difference (voltage) created by the flow of current was measured between one or more pairs of voltage electrodes along the survey transect. The pairs of electrodes were arranged in an approximately straight transect, although obstructions and topographic differences prevented perfectly straight transects. The spacing between the electrodes and the geometry of the current electrodes to the voltage electrodes are referred to as an "array type."

Various array types have advantages and disadvantages depending on the site setting and the objective(s). For this project the dipole-dipole array was used, which generally produces high resolution for both lateral and vertical heterogeneities but may have a limited depth penetration and is susceptible to electrical noise from metallic structures such as pipes.

"Apparent resistivity" is reported in units of ohm-meters and is defined as the bulk, average resistivity of all subsurface materials influencing the current, not the true resistivity of a material at a specific depth, and once the apparent resistivity data set is acquired, the data must be processed using an inversion modelling program to resolve an estimate of the true resistivity distribution of the subsurface.

ER equipment used during this investigation consisted of an Advanced Geosciences, Inc. (AGI) (Austin, Texas), SuperSting™ R8/IP earth resistivity system with a 56 electrode switch box, electrode cables with 3 meter connector spacing, and stainless-steel electrodes. Resistivity data were stored in the internal memory of the SuperSting™ R8/IP and downloaded to a laptop computer. Field data files were assigned a name that included transect name and array type. After each survey was complete, the downloaded data were processed (i.e., inverted) in the field using AGI's proprietary EarthImager 2D software (Lagmanson and Yang 2002) to evaluate data quality and provide preliminary images to guide subsequent transect alignments.

Data Position Control

The locations of the EMI and resistivity data points were controlled using a Hemisphere A325 mapping grade GPS receiver, equipped with real-time differential correction (i.e., OmniSTAR). The accuracy of this GPS receiver is one meter or less under typical conditions.

Data Processing and Presentation

Once the data are acquired, they are transferred to a computer and processed to create modelled crosssections that are prepared for geologic interpretation by an experience geophysicist. The 2D ER data were processed using the program EarthImager™ 2D v2.4.2. Build 627 software program by AGI (Lagmanson and Yang 2002). Prior to data modelling, a number of pre-processing steps were completed, including removal of data with voltage spikes, poor voltage decay, and low data quality readings in the raw field data.

Resistivity data were processed using a damped least-squares or smooth model inversion method using a finite element mesh to generate a 2D model of resistivity versus depth. The primary objective of inversion is to reduce data misfits between field measurements and calculated data of a reconstructed model.

Data from resistivity lines ER-1, ER-2, ER-4, and ER-5 are depicted graphically as cross-sectional images with annotations of the interpreted geologic conditions (**Figures D-2** through **D-5**). Note that output from Line ER-3 was omitted from this report due to poor data quality. The cross-sections were made using the inverted ERI model resistivity data output from the EarthImager™ modeling program; they were gridded and contoured using Golden Software Surfer® 12 software. The descriptive geologic information from previous borings and Spring 2016 confirmation borings (SB-1601 through SB-1605, MW-1604, MW-1606) were superimposed on the cross-sections and interpretations made of the aquifer boundaries and other geologic information.

Sources of ER Data Interference

Some of the ERI datasets contained interference potentially caused by a combination of such factors as: 1) poor electrical contact between electrode and soil; 2) high contact resistance; 3) the presence of conductive subsurface infrastructure including metallic piping; and, 4) stray electrical currents and spontaneous potentials in the subsurface. Data artifacts attributed to interference caused by buried metal piping are shown in **Figure D-3** and **Figure D-5,** with the approximate extent of the affected data marked in gray fill.

ER RESULTS AND GEOLOGIC INTERPRETATIONS

Typically, lithologies can be distinguished by their ranges of electrical resistivity values. In freshwater environments, native sand and gravel are usually the most resistive material, and silt and clay are the least resistive materials. Non-native fill materials, such as those observed at the site, can also display a range of electrical resistivity values with coarser sand/gravel fill materials typically displaying higher resistivity values compared to finer-grained clayey fill materials that typically display lower resistivity values. Fly ash fill materials in particular are generally observed to have an elevated electrical conductivity in comparison to most native soils due to the fine grained nature of the fly ash (large amount of surface area) and the leachable materials such as iron and aluminum oxides and other elements such as Ca, K, Mg, Mn, Na, Sr, Ti, and S that are in large enough concentration to potentially increase total dissolved solids (TDS) levels and electrical conductivity if dissolved. Groundwater quality can also be assessed using electrical resistivity, with impacts associated with fly ash being significantly more electrically conductive (less resistive) than ambient groundwater conditions.

The electrical resistivity cross-section provides the foundation for the geoelectrical structure of the subsurface at the site, with the presumption that the bulk soil response approximates variations in lithologic materials and groundwater conductivity (see table below).

The calculated apparent resistivity values ranged over four orders of magnitude at the site from approximately 1 Ohm-meters to greater than 1000 Ohm-meters. Background resistivity values for sandstone bedrock observed in Line ER-5 data (**Figure D-5**) are greater than Ohm-meters (red to purple color range) which is consistent for competent sedimentary bedrock. Unconsolidated native sand/gravel soils or sandy fill materials fall in the range of about 100 to 800 Ohm-meters (green to red color range), which is consistent with fill materials and native soils with varying sand, silt, and gravel content. Unconsolidated native clay soils, clay fill materials, or fine-grained fly ash fill deposits fall in the range of about 10 to 100 Ohm-meters (blue to green color range). As depicted in **Figure D-2** and **Figure D-5,** anomalous zones of significantly low anomalous resistivity less than 10 ohm-meters are shown (dark blue to white color range). These zones of anomalous low resistivity are not likely due to naturally occurring soils/geologic conditions, but are rather due to man-made external influences, such as the presence of geochemically impacted groundwater or metallic features (site structures or subsurface utility lines). Based on the presence of fly ash deposits above the significantly low resistivity zones observed in **Figure D-2** and **Figure D-5**, these zones are interpreted to indicate saturated soils impacted by high TDS groundwater. Furthermore, the coarser-grained sand (SA) and sandy gravel (SG) soils observed at boring SB-1602 and SB-1603 (**Figure D-2**) and boring SB-1604 (**Figure D-5**) that lie at depths intersecting the interpreted high TDS zones, suggest a likely preferential pathway for groundwater flow. As noted in **Figure D-5**, the origin of coarser-grained material shown at SB-1604 is likely channel fill based on the depiction of a historic stream channel shown in 1909, 1931, and 1958 site topographic maps.

The geologic framework at the site has been previously reported to be an unconsolidated aquifer consisting of saturated alluvial sediments beneath and surrounding the site. The upper limit of the uppermost aquifer is defined by the elevation of the sand saturated zone, which ranges from approximately 550 to 560 ft. Using both boring log observations and resistivity values, the interpreted upper and lower extent of sand

saturated zone is delineated by black dashed lines as shown in **Figures D-2** through **D-5**. An interpreted groundwater surface is also shown as a blue dashed line in **Figures D-2** through **D-5.**

It should be noted that known fly ash deposits at the site, confirmed by Spring 2016 soil borings, exhibit resistivity values that fall in same range as native soils and therefore the sole use of resistivity values displayed in the cross-section cannot be used to distinguish ash deposits from native soils.

Line ER-1 2D Electrical Resistivity Modeling Results

AEP AMOS Generating Plant - Ash Pond Complex Winfield Road Winfield, West Virginia

Winfield, West Virginia

Winfield, West Virginia

Winfield, West Virginia

Horizontal Scale: 1" = 80' Vertical Scale: 1" = 40'

Well Development Logs

Development Personnel: K. Swiadek

Notes: Removed 30 gallons with surge block and proactive pump. Turb never high during development.

 $1-\frac{1}{4}$ " = 0.06 2 " = 0.16 3 " = 0.37 4 " = 0.65
 $1-\frac{1}{2}$ " = 0.09 $2-\frac{1}{2}$ " = 0.26 $3-\frac{1}{2}$ " = 0.50 6 " = 1.47 $3-\frac{1}{2}$ " = 0.50 bmp below measuring point ml milliliter milititer NTU Nephelometric Turbidity Units ORP Oxidation-Reduction Potentia
C Degrees Celsius mS/cm Milisiemens per centimeter PVC Polyvinyl chloride mN millivolts °C Degrees Celsius mS/cm Milisiemens per centimeter PVC Polyvinyl chloride my million mean sea-level s.u. Standard units feet msl mean sea-level
Gallons per minute M/A Not Applicable gpm Gallons per minute N/A Not Applicable mg/L umhos/cm Micromhos per centimeter mg/L Miligrams per liter mg/L Miligrams per liter NM Not Measured VOC Volatile Organic Compounds **Well Casing Volumes (gallon/feet)**

Notes: 27 gallons pumped via foot valve. Stick-up less than 3' tall; 2x2' pad, stick-up lid hinge broken. No sand in stick-up.

Notes: Bollards in bad condition - 1 bent. Stick-up lid broken and stick-up <3' tall. 2x2' pad. In swamp; poor access,

Notes: 40 gal removed with foot valve/surge block. Pump rate would not go lower.

Development Personnel: K. Swiadek Notes: Removed 65 gallons with Waterra and proactive pump. Very fine sand/silt.

Notes: Removed 60 gallons with surge block and pump.

<u> 1989 - Johann Stoff, deutscher Stoff, der S</u>

Development Personnel: T. Runge

Notes: 40 gal removed with foot valve and surge block.

14:32 | 1:14 | 51.70 | 21.69 | 591 | 0.215 | 151.00 | 18.17 | 6.08 | -17 | 4.51 | 14th | | Tan; no odor

 0.215 | 151.00 | 18.17 | 6.08 | -17 | 4.51

167.0

Development Personnel: T. Runge

Notes: 40 gal removed with foot valve and surge block.

11:55 | 1:10 | 42.84 | 32.51 | 725 | 0.464 | 19.7 | 16.41 | 6.10 | 36 | 4.80 | 13th | | Clear; no odor 12:00 | 1:15 | 43.03 | 32.56 | 725 | 0.461 | 12.20 | 16.44 | 6.05 | 32 | 2.78 | 14th | | Clear; no odor

0.464 | 19.7 | 16.41 | 6.10 | 36 | 4.80 0.461 12.20 16.44 6.05 2.78

Record of Changes

RECORD OF CHANGES

FLY ASH POND CCR GROUNDWATER MONITORING WELL NETWORK EVALUATION

Amos Plant Winfield Road Putnam County Winfield, West Virginia

April 17, 2019

Everett Fortner III, PG Senior Geologist

TV allier-

Matthew J. Lamb Project Manager

Todd Minehardt, PE **Principal Engineer**

arcagis com

FLY ASH POND CCR GROUNDWATER MONITORING WELL NETWORK EVALUATION

Amos Plant **Winfield Road Putnam County** Winfield, West Virginia

Prepared for: American Electric Power Service Corporation

Prepared by: Arcadis U.S., Inc. 100 E Campus View Boulevard Suite 230 Columbus Ohio 43235-1447 Tel 614 985 9100 Fax 614 985 9170

Our Ref.: WV015976.0005

Date: April 17, 2019

This document is intended only for the use of the individual or entity for which it was prepared and may contain information that is privileged, confidential and exempt from disclosure under applicable law. Any dissemination, distribution or copying of this document is strictly prohibited.

https://arcadiso365.sharepoint.com/sites/AEP_US_teamsite/ARCADIS_Only/Amos/FAP/CCR Reports/Well Network/1-Amos-CCR-FAP-Well Network-Text-2019-04-17.docx

CONTENTS

TABLES

FIGURES

- Figure 1 Site Location Map
- Figure 2 Plant and CCR Unit Location Map
- Figure 3 Fly Ash Pond Layout and Well Locations Map
- Figure 4 Generalized Stratigraphic Column
- Figure 5 Cross Section Location Map
- Figure 6 Cross Sections A-A', B-B' and C-C'
- Figure 7 Fly Ash Pond Comprehensive Hydrograph

FLY ASH POND CCR GROUNDWATER MONITORING WELL NETWORK EVALUATION

APPENDICES

ACRONYMS AND ABBREVIATIONS

1 INTRODUCTION

This report was prepared by Arcadis U.S., Inc. (Arcadis) for American Electric Power Service Corporation (AEP) to assess the adequacy of the groundwater monitoring well network included in the Coal Combustion Residual (CCR) requirements, as specified in Code of Federal Regulations (CFR) 40 CFR 257.91, for the fly ash pond (FAP, CCR Unit) located approximately 1.5 miles southwest of the AEP Generating Plant (Plant) located on Winfield Road in Winfield, West Virginia (**Figure 1**). Specifically, this Groundwater Monitoring Well Network Evaluation report is intended to address the requirements of 40 CFR 257.91 paragraphs (b), (c) and (e) regarding the adequacy of the groundwater monitoring system. The CCR requirements include an evaluation of the adequacy of the groundwater monitoring well network to characterize groundwater quality up and down gradient of the CCR unit in the uppermost aquifer and an evaluation of whether the CCR unit meets up to 5 location restrictions. The restrictions include: 1) the base of the CCR unit is 5 feet (ft) above and isolated from the uppermost aquifer, and the CCR unit may not be located 2) in a wetland, 3) within 200 ft of the damage zone of a fault that has displacement during the Holocene, 4) within a seismic impact zone, or 5) in an unstable area. The objective of this report is to present an evaluation of the adequacy of the groundwater monitoring well network in the uppermost aquifer at the FAP (Site). The evaluation of the five location restriction criteria is not included in this report and will be completed under separate cover.

Two other regulated CCR units associated with the Plant were identified for review, which include the onsite ash pond system and the offsite flue gas desulfurization (FGD) landfill (**Figure 2**). The evaluations of the onsite ash pond system and offsite FGD landfill are not included in this report and were completed under separate cover.

An initial evaluation of the monitoring well network was completed in May 2017 and included a review of AEP-provided data associated with previously completed subsurface investigation activities in the vicinity of the FAP, as well as publicly-available geologic and hydrogeologic data. Based on this initial evaluation, gaps in the monitoring well network were identified. Additional monitoring wells were installed from November 2017 through July 2018. Drilling activities were performed by West Virginia-licensed drilling contractors (AEP and DLZ) with Arcadis personnel completing borehole logging and well installation oversight. During well installation, borehole packer testing was performed by the drilling contractor at select boreholes. Additionally, borehole geophysical logging was completed at select boreholes by Marshall Miller & Associates, Inc. The following report presents the current Conceptual Site Model (CSM) based on historical Site information including geologic and hydrogeologic data. This report also includes a description of the uppermost aquifer and the current monitoring well network. The monitoring well network was determined to adequately monitor up gradient, down gradient, and background areas adjacent to the FAP in the uppermost aquifer and hydraulically connected units; therefore, the report objective has been met.

2 BACKGROUND INFORMATION

The following section provides background information for the AEP Amos Generating Plant FAP that was used to support the groundwater monitoring well network evaluation.

2.1 Facility Location Description

The FAP is located in Putnam County approximately 1.5 miles southwest of the Plant and approximately 0.5 miles west of Winfield Road (WV 817) (**Figures 1** and **2**). The Site occupies approximately 170 total acres (Terracon, 2017a). The FAP is located in an isolated area surrounded by undeveloped wooded areas. Residential areas are located within one half mile from the Site to the north, west, and southwest; and mixed residential-industrial land use is located south of interstate 64. The FAP is approximately 0.75 miles north of the intersection of interstate 64 and the Kanawha River.

2.2 Description of Fly Ash Pond CCR Unit

The following section will discuss the FAP configuration, area, volume, construction and operational history, and surface water control associated with the FAP.

2.2.1 Impoundment Configuration

The FAP is located in a valley at the headwaters of Little Scary Creek and is surrounded by ridges on most sides (Stantec, 2012). The southwestern corner of the FAP consists of a zoned earthen dam that is approximately 220 ft tall with a crest elevation of 875 ft above mean sea level (amsl). The dam is approximately 30 ft wide and 2,000 ft long. The upstream slope of the dam ranges from 2.5:1 to 3:1 (horizontal: vertical), while the downstream slope ranges from 2:1 to 2.5:1 (Stantec, 2012). The surface of the FAP impoundment is covered with an engineered cover consisting of subgrade fill (fly ash and onsite borrow material), flexible membrane and geotextile layers, and soil/vegetative layers. General construction of the landfill and landfill closure is further detailed in the Phase I, Phase II, and Phase III *Construction Certification Reports* (Terracon, 2016; 2017a; 2017b) and the *Design Basis Report* for the Site (Stantec, 2012).

2.2.2 Area/Volume

The total area of the Site is approximately 170 acres which includes both disposal and non-disposal areas. Prior to FAP closure, the approximate surface area of the FAP at normal pool (860 ft amsl) was 166 acres (Stantec, 2012). After closure, the final design permitted surface area of the FAP at normal pool was 120 acres. The maximum permitted reservoir volume before and after pond closure was 10,735 and 7,056 acre-ft., respectively (AEP, 2012) (**Figure 3**).

2.2.3 Construction and Operational History

The FAP began receiving fly ash in October 1971, the final of three construction stages for the unlined impoundment was completed in 1978 (Electric Power Research Institute [EPRI], 1999), and operations continued until 2010. The zoned dam was constructed in three stages via conventional downstream

FLY ASH POND CCR GROUNDWATER MONITORING WELL NETWORK EVALUATION

construction methodology, with an inclined upstream impervious zone and downstream zones of earth and rockfill (Stantec, 2012). Since 1973, the FAP received only sluiced fly ash from Unit 3 at the Plant at an average rate of 214,300 dry tons per year. Periodically, a polymer would be added to the sluiced fly ash to facilitate settling (EPRI, 1999). A concrete principal spillway decant riser structure was constructed that included discharge piping located in an undisturbed area on the northwest end of the dam. The decant piping discharged via a tunnel into an adjacent un-named tributary to Little Scary Creek on the west side of the FAP. Since 2010, the principal pool elevation was controlled by a reclaim water pump system. The principal spillway was abandoned via in-place grouting during FAP closure. Post closure water management includes an emergency open channel spillway excavated through bedrock on the west side of the FAP (Stantec, 2012).

In 2010, the FAP reached its maximum capacity, Unit 3 had been converted to a dry system, and fly ash was being disposed at the Amos FGD Landfill. In 2012, the FAP *Design Basis Report* (Stantec, 2012) was approved by the Dam Safety Section of the West Virginia Division of Environmental Protection and closure activities (i.e. capping) of the FAP commenced. The initial closure plan is described in detail in the *Design Basis Report*, and details regarding final FAP closure are described in the Amos FAP Closure *Phase I Construction Certification Report* (Terracon, 2016), *Phase II Construction Certification Report* (Terracon, 2017a), and *Phase III Construction Certification Report* (Terracon, 2017b). In general, the FAP cap consists of the following layers:

- Subgrade preparation (in-place fly ash and onsite borrow material dewatering, excavating, grading)
- 40-mil linear low-density polyethylene flexible membrane liner
- 8 ounce geotextile cushion layer
- 18 inches of protective soil cover layer
- 6 inches of vegetative cover layer
- Drainage structures
- Seeding and mulching

The closure plan of the FAP specified the following construction phases, or activities (Stantec, 2012):

- Phase I Initial mass grading
- Phase II Close dredge containment areas and grade dredged areas
- Phase III Continue closure
- Phase IV Completion of diversion network
- Phase V Final closure operations

These five closure construction activities were performed in three separate phases: Phase I (eastern portion of FAP), Phase II (central portion of FAP), and Phase III (western portion of FAP). In May 2015, a pilot test pad was constructed to test the integrity of geosynthetic components of the liner after placement of protective cover soils. The pilot test pad construction methods were utilized for all full-scale liner deployment.

Phase I geosynthetic construction began on June 25, 2015 and was completed on November 5, 2015. Phase I protective soil cover construction began on July 7, 2015 and was completed on November 18, 2015. A total of approximately 95 acres of geomembrane and geotextile placement with 85 acres of protective cover was placed during Phase I construction activities (Terracon, 2017a). Phase II geosynthetic construction began on May 31, 2016 and was completed on September 15, 2016. Phase II protective soil cover construction began on June 7, 2016 and was completed on October 18, 2016. A total of 60 acres of geomembrane and geotextile placement with 49 acres of protective cover was placed during Phase II construction activities (Terracon, 2017a). Phase III geosynthetic construction began on April 13, 2017 and was completed on July 15, 2017. Phase III protective soil cover construction began on April 24, 2017 and was completed on July 20, 2017. Final Phase III construction activities included construction of the final spill way (Terracon, 2017b).

2.2.4 Surface Water Control

Prior to 2010, surface water elevation control at the Site was maintained by the concrete principal spillway, which was designed to safely accommodate a 100-year storm event, that discharged to Little Scary Creek via a National Pollutant Discharge Elimination System permitted outfall (EPRI, 1999). A reclaim water pump system was installed in 2010, which then served as the primary surface water elevation control. The reclaim water pump system conveyed flow from the FAP and discharged to the bottom ash pond at the Plant, including contact water stored within the FAP footprint (Stantec, 2012). During FAP closure beginning in 2012, storm water runoff was managed through a series of sloped surfaces, drainage channels, channel cuts, and temporary contact water containment ponds. Contact water drainage channels and containment ponds were located to contain runoff water that contacted CCR materials during various phases of FAP cap construction. Permanent drainage channels were constructed as two-staged channels with a small "bankfull" channel and a broader shallow floodplain (Stantec, 2012). The banks of these channels are lined with geo-composite installed over geotextile. A protective 12-inch soil cover was placed in the channel, followed by an additional geotextile and number 3 stone (Terracon, 2017a). There has been no active surface water control at the FAP since the majority of Phase III construction activities concluded in July 2017. Additional earthwork was performed in November 2017 due to insufficient protective cover depth in some areas of the FAP.

2.3 Previous Investigations

In 1969 and into the 1970s, Acres American Incorporated and Woodward-Moorhouse & Associates, Inc. (later Woodward-Clyde Consultants) completed several geotechnical investigations of the FAP area. These investigations included extensive soil and rock boring and logging, test trench excavation and logging, borehole water pressure tests, piezometer installation and water level measurement in the dam area and overburden and bedrock laboratory geotechnical analysis (Acres American Incorporated, 1971; 1975a).

From 1995 to 1996, site investigation activities were completed including the drilling and installation of seven bedrock monitoring wells (MW-1 through MW-7), geophysical logging of three boreholes (MW-2, MW-4, and MW-5), and packer testing of three boreholes (MW-2, MW-4, and MW-5). Packer test data was qualitatively reviewed to compare relative hydraulic productivity of rock units and was used to assist

with well screen placement of these wells. Additionally, water samples were collected from both the FAP outfall and FAP surface water (EPRI, 1999).

In late 2007 and early 2008, H.C. Nutting, Inc. completed site investigation activities associated with raising the FAP dam. This included the completion of 15 soil and bedrock borings with standard penetrometer testing and Shelby tube sampling. Additionally, six pneumatic piezometers were installed in select borings for water level measurements (B-2, B-3, B-4, B-14, B-16, and B-17). Six packer tests were also conducted during this investigation at borings B-1, B-2, B-4, B-5, B-6, and B-10. One additional boring, B-17, was used for cone penetrometer testing (H.C. Nutting, 2008).

Also in 2008, AEP completed rock coring along a constructed haul road and test pit logging associated with a study of borrow sites at the FAP. Samples were also collected for unconfined compressive test analysis. In total, seven haul road boring were completed and logged, five test pits were logged, and 18 rock cores were submitted for unconfined compressive test analysis (AEP, 2008).

Throughout the lifespan of the FAP, routine visual inspection and stability analyses were completed. The most recent inspection during the FAP operational lifespan was documented in the *2011 Dam and Dike Inspection Report, John Amos Power Station, St. Albans, West Virginia* (Stantec, 2011). The results of this inspection indicated that the FAP was in good condition, although some seepage and erosion issues were noted. This inspection also included a quantitative analysis of horizontal and vertical movements of the FAP dam measured in reference to surveyed reference points or monuments. This assessment concluded that no unusual movement was observed (Stantec, 2011).

In 2012, Stantec completed design efforts for FAP closure and cap construction (Stantec, 2012). As part of the closure design, Stantec completed an evaluation of the stormwater management design, discussed above in Section 2.2.4 and below in Section 2.4.1. In addition, this 2012 investigation included a geotechnical evaluation of settlement, slope stability, and liquefaction potential. No new data was collected as part of the geotechnical evaluation, and all material properties used in geotechnical modeling were derived from review of previous site investigations (Acres American Incorporated, 1974; 1975b; 1975c; H.C. Nutting, 2008).

In 2017 and 2018, Arcadis completed a comprehensive groundwater site investigation that included well installation activities to augment the CCR monitoring well network at the FAP. This work included rock coring at locations around the FAP. Boreholes were continuously logged and advanced to at least the depth of the Morgantown sandstone. After completion of the boreholes, vertical geophysical logging was conducted at five locations (MW-1801, MW-1802, MW-1805, MW-1806, and MW-1808). Data collected during geophysical logging was used in combination with rock core logging to interpret and correlate bedrock units across the Site. Geophysical data included natural gamma, neutron porosity, temperature, delta temperature, fluid conductivity, 16-64 normal resistivity, lateral resistivity, spontaneous potential, single point resistance, and caliper width. Finally, hydraulic testing was completed at select boreholes (via straddle packer tests) and monitoring wells (via drawdown and recovery yield tests) to quantify hydraulic parameters of groundwater zones and to assist in final placement of well screen intervals. A complete description of field methodology is provided in **Appendix A**. Results of geophysical logging and hydraulic testing is discussed in Section 3.1 of this report.

2.4 Hydrogeologic Setting

The geologic setting surrounding the Site consists of ridges formed by the Pennsylvanian age Monongahela and Conemaugh Formations. The Monongahela and Conemaugh Formations consist of sandstones, shales, limestones, and coal. A generalized stratigraphic column is included on **Figure 4**. These rocks have been fractured as stress declined during erosion, leading to expansion of the rock and a system of fractures throughout the bedrock. This process is called stress relief fracturing (SRF) and is more prevalent in shallow bedrock. Groundwater is present at the Site within these fracture systems (secondary porosity), while groundwater within primary porosity components (i.e., pore spaces) is less significant. Stress relief fractures occur more abundantly in brittle lithologic units (e.g. sandstone and limestone), and less likely to occur in shaley units (EPRI, 1999). The uppermost aquifer present at the Site has been determined to be the SRF (variable thickness), which includes the Upper Connellsville sandstone (approximately 10 to 20 ft thick). Secondary groundwater-bearing zones that are not aquifers include the highly fractured and weathered shale within the Clarksburg clay-shale (approximately 10 ft thick), and upper and lower depositional contacts of the Morgantown sandstone (**Figure 4**). Despite relatively low groundwater flow rates associated with these secondary groundwater-bearing zones, there is hydraulic connection between the SRF/Upper Connellsville sandstone via open vertical fractures and horizontal bedding planes. The lines of evidence for the SRF hydraulic connection from ridge to valley is provided in Section 3.2.3.

Based on boring logs of rock cores and vertical borehole geophysics conducted during monitoring well installations in 2017 and 2018 at the FAP, the three uppermost sandstone units are found only in ridges surrounding the FAP. The Lower Pittsburgh sandstone occurs from a lower elevation of approximately 913 ft to an upper elevation of approximately 935 ft above mean sea level (amsl) and is present at MW-8 and MW-9 in ridges to the north of the FAP. This elevation is above the regional water table and the sandstone unit is not saturated. The Upper Connellsville sandstone is generally 20 to 30 ft thick and because of the general northwesterly dip and varying thickness of the Upper Connellsville sandstone, the unit elevation is variable across the Site. The lower elevation occurs as low as approximately 804 ft, and the upper elevation occurs as high as 854 ft amsl. The Upper Connellsville sandstone is discontinuous by topography, truncates at the FAP valley walls, and is connected with the SRF system. The Lower Connellsville sandstone is present; however, it is extensively interbedded with shale. Fracturing in the Lower Connellsville sandstone and interbedded shale is not prevalent. The Lower Connellsville stratigraphic interpretation was based on the presence and elevation of the Little Clarksburg Coal at boring B-0608 northeast of the FAP, which marks the base of the Connellsville sandstone group deposition (Cross, A.T and M.P. Shemel, 1956; Latimer, W.J., et al., 1911; Orsborn, N.P., 2008; Reger, D.B., et al., 1918).

The Clarksburg shale is between the Lower Connellsville sandstone and Morgantown sandstone and occurs as a thick sequence of shale interbedded with siltstone and occasional sandstone. It ranges in thickness from approximately 90 to 110 ft. There is a laterally continuous fissile shale interval observed within the Clarksburg shale that is a secondary groundwater-bearing zone. Geophysical and rock core logs suggest the fissile shale may be related to fresh water deposition and the top of the fissile shale may be characterized as a stratigraphic disconformity.

The Morgantown sandstone is laterally continuous beneath the entire FAP area and is regionally present underlying valleys. The understanding of this unit structure and continuous occurrence was used to help

FLY ASH POND CCR GROUNDWATER MONITORING WELL NETWORK EVALUATION

guide 2017 and 2018 boring locations and monitoring well placement. It is up to 30 ft thick regionally and occurs at the Site at elevations ranging from as low as approximately 610 ft to as high as 665 ft amsl. The Morgantown sandstone pinches out south of the FAP towards the city of Teays Valley (EPRI, 1999) and truncates into the Kanawha River valley wall to the east. Secondary groundwater-bearing zones in the Morgantown sandstone occur primarily along the upper and lower erosional contacts.

Unconsolidated deposits are virtually absent in the ridges surrounding the FAP except for some minor residuum. Unconsolidated deposits are present with appreciable thicknesses in the Little Scary Creek valley southwest of the FAP and dam. The thickness of unconsolidated sediments southwest of the FAP ranges from approximately 8.5 ft at boring 2008-1 to 31 ft at MW-2. Sediments are poorly sorted and consist of gravel through sand, but generally coarsen downward. Weathered rock fragments are encountered near the soil-rock interface. The unconsolidated zone is not considered a water-bearing unit because groundwater generally occurs deeper and is associated with the SRF. During a site visit on April 19, 2017 by Arcadis, Little Scary Creek was observed to flow on top of bedrock southwest of the dam near MW-2.

These features are further illustrated on three lines of cross section through the FAP. Two lines trend from southwest to northeast and northwest to southeast through the central portion of the FAP (A-A', and B-B', respectively), and the other trends from west to east across ridges along the northern portion of the FAP (C-C'). The cross section location map is included as **Figure 5** and the cross sections are included as **Figure 6**. Boring logs and well construction diagrams are included in **Appendix B**.

2.4.1 Climate and Water Budget

The climate of Winfield, West Virginia is characterized as humid continental with an average rainfall of approximately 40 inches annually. The average maximum temperature is 66 ºF and the average minimum temperature is 44 ºF based on information from Southeast Regional Climate Center (2017).

The results of a numerical water budget analysis performed as part of the October 2012 *Design Basis Report* is described in detail in Appendix C of that report (Stantec, 2012). The primary objective of this analysis was to evaluate the adequacy of reservoir capacity under a variety of precipitation and runoff scenarios. It was determined that the reservoir capacity was not exceeded under any of the simulated scenarios (Stantec, 2012).

Numerical groundwater modeling efforts completed by Arcadis in 2019 included both steady-state and transient flow analysis. Based on model calibrations, it is estimated that approximately 11 inches of precipitation reaches the underlying aquifers in the form of recharge per year.

2.4.2 Regional and Local Geologic Setting

2.4.2.1 Unconsolidated

The Site is located in the Appalachian Plateau physiographic province, and unconsolidated soils are limited in extent and are residual and colluvial in origin. Soils consist of gravel, sand, silt, or clay. Based on review of site boring logs, the soil-rock interface is abrupt with little to no occurrence of weathered bedrock or residuum. Soil thickness ranges from nearly 0 ft in the ridges (MW-1809) to greater than 30 ft in the valleys (e.g. MW-2).

2.4.2.2 Bedrock

The primary regional bedrock units encountered are Pennsylvanian age sedimentary rocks of the Monongahela Formation and Conemaugh Formation, in descending order from youngest to oldest. The depositional environment for these formations is characterized by a gradually subsiding shallow sea with alternating marine and freshwater strata. The sedimentary package associated with the Monongahela and Conemaugh Formations consists of alternating shale and sandstone units, with occasional thin limestone and coal beds. Several coal horizons are present in the region and often serve as marker beds for unit identification. The principal regional marker bed is the Pittsburgh Coal (i.e. No. 8 Coal), which marks the transition from the Monongahela and Conemaugh Formations (EPRI, 1999). However, the Pittsburgh Coal is not represented in Site borings. The Pittsburgh Limestone has been identified in two borings at the FAP, MW-3 and 2008-26, and is used to mark the Monongahela-Conemaugh transition at the Site. Additionally, the Little Clarksburg Coal has been identified at FAP boring B-0608 to the northeast and is used to mark the base of the Connellsville sandstone deposition (Latimer, W.J., et al., 1911). Deeper bedrock units produce oil and gas. Associated active oil and gas wells are located in the vicinity of the FAP. The location of these wells is shown on **Figure 3**.

The Monongahela Formation is found capping the hills surrounding the Site. The Conemaugh Formation is also found in the hills surrounding the Site, underlying the Monongahela Formation, and extending into the valley floor beneath the FAP. Bedrock occurrence is illustrated on cross sections (**Figure 6**) and detailed in boring logs included in **Appendix B**.

The Site is situated between the Parkersburg Syncline to the northwest and the Byrnside Anticline to the southeast, with regional geologic structure characterized by very gently northwestward-dipping bedding planes toward the Parkersburg Syncline (EPRI, 1999). Bedding planes of the nearby Amos FGD landfill have been reported as striking to the east-northeast and dip to the north-northwest at approximately 20 ft per mile (GAI, 2006).

Arcadis completed additional geologic structure analysis in 2017. This analysis included a review of bedding plane attitudes measured by AEP in 1975 from test trenches surrounding the FAP (AEP drawing no. SK-3826-C-17). Arcadis also computed bedding plane attitudes via boring log correlation and multipoint gradient computations based on fence diagrams and cross sections generated during the EPRI groundwater study (EPRI, 1999). Finally, bedding plane dip as depicted in geologic cross sections of the Amos Quarrier Ash Landfill were approximated (EPRI, 1999). These analyses suggest that bedrock geologic structure at the Site consists primarily of north-northeasterly striking beds that dip very shallowly (i.e. generally less than 1 degree) to the west-northwest. Additionally, evaluation of the few fractures (joint) measurements within the sandstone units indicate near vertical fractures with a strike of 70 degrees from north.

In 2018, Arcadis developed a visual three-dimensional CSM of the Site using Earth Volumetric Studio (CTech, 2017). The CSM was constructed using lithologic data collected during well installation and sequentially producing an area-wide stratigraphic structural model. Layers were included to focus on main stratigraphic and hydrostratigraphic layers (geospatial, followed by hydrostratigraphic). The resulting three-dimensional CSM was used to interpret the lateral extent of each bedrock unit at the Site beyond the known data points.

2.4.3 Surface Water and Surface Water Groundwater Interactions

The FAP is located within the Little Scary Creek watershed, which flows from the toe of the dam southwest of the FAP. While the FAP was in operation, Little Scary Creek received impoundment discharge via a National Pollutant Discharge Elimination System permitted outfall located in an unnamed tributary west of the FAP. Little Scary Creek flows south from the FAP into Teays Valley and discharges into the Kanawha River (EPRI, 1999). Groundwater from Little Scary Creek Valley, in which the FAP is located, discharges either to Little Scary Creek and its tributaries, other unnamed tributaries of the Kanawha River, or further down-valley in the Teays Valley and Kanawha River alluvium.

Groundwater flow direction typically follows topographic relief and fracture orientation (horizontal bedding plane and stress relief) but is also influenced by stored water within the FAP. The FAP provides recharge and contributes to radial groundwater flow in the transmissive bedrock zones that are in contact with the saturated fly ash. The FAP has been completely capped and water levels are declining due to reduced recharge.

As the water in the FAP declines, water levels in higher elevation bedrock are also expected to decline. In addition, the confinement of the FAP is likely to transition from unconfined to confined or semi-confined based on the cap limiting barometric (atmospheric) pressure interaction. To evaluate these effects of FAP capping, barometric pressure data, precipitation, and water level data from January 2012 through April 2018 was compiled. Data was processed for the following wells and piezometers: STN-12-4 (multi-port well), STN-12-8, STN-12-9, MW-8, and MW-9. The STN piezometers represent the FAP hydraulics and MW-8/9 represented the Upper Connellsville sandstone-SRF outside of the cap on the northeast portion of the Site. The resulting hydrograph is shown as **Figure 7** that includes piezometer and well locations. The continuous data was collected every 12-hours from pressure transducers in STN-12-8 and STN-12-9. Data processing was completed to evaluate the barometric pressure relationship to water levels from the pre-capping to the post-capping periods. The results indicated that a transition occurred, and a correction was applied to the post-capping water levels based on estimated barometric efficiencies of 40% for STN-12-8 and 30% for STN-12-9. Water levels at STN-12-4, STN-12-8, and STN-12-9 are generally decreasing for the post-capping period. There are fluctuations post-capping within STN-12-8 and STN-12- 9 that are likely related to seasonal recharge from the surrounding ridges.

2.4.4 Water Users

There are no active groundwater production wells at the Site. In 2017, a water well inventory for the Amos Plant indicated no information regarding the use of wells located within a half mile of the Site was available (Banks, 2017). However, non-production groundwater wells that were identified are registered with the United States Geological Survey (USGS) and appear to have been used for groundwater monitoring. Six of the ten well locations referenced in that report were located on or immediately adjacent to the Amos Plant, northeast of the FAP. Of those wells not obviously related to the Plant, one is located approximately 1,500 ft west of the Plant's onsite ash pond system, one mile north of the FAP. The other three well locations are located approximately 3,500 to 5,000 ft south of the Plant's onsite ash pond system, greater than 2,000 ft east of the FAP. The Banks water well report is included in **Appendix C**.

An additional off-site well survey of properties surrounding the FAP was completed by Arcadis in 2018. The purpose of this survey was to determine if surrounding properties had a connection to public water

FLY ASH POND CCR GROUNDWATER MONITORING WELL NETWORK EVALUATION

service by the Putnam Public Service District for Putnam County or served by another potential source (cistern or groundwater). The Putnam Public Service District source water is from the Poplar Fork Creek water shed located over 4 miles to the northwest of the Site. The water is pumped to a reservoir and subsequently treated at the water treatment plant. The resulting survey results are present in **Appendix C** (Table C-1 and Figure C-1). The table is organized by parcel identification in numerical order with additional information, if available, including physical address, year constructed, land use type, owner and owner address. This parcel information was provided to the Kanawha-Charleston Health Department to verify public water supply to that parcel or if there is a known private well on the property. Of the 217 parcels identified within approximately one mile of the FAP during this survey, 144 parcels were confirmed to have a municipal potable water source. Land use at these 144 parcels includes, but is not limited to, one- and two-family residences, vacant residential lots, mixed residential/commercial lots, mobile homes, and active farms. The remaining 73 parcels with no confirmed public potable source did not have physical addresses, which likely means the parcel has not been developed and does not have a need for potable water.

Regionally, the Kanawha River alluvial aquifer is used as a source of water for public, industrial, and domestic supply. However, given its relatively lower specific capacity (11.8 gallons per minute [gpm]/ft median), it is used less frequently than the Ohio River alluvial aquifer. The Teays River Valley alluvial aquifer, which is similar in composition to the Kanawha River alluvial aquifer, is also used for potable water. Regionally, wells drilled in the Conemaugh and Monongahela Groups have median specific capacities ranging from 0.50 to 0.75 gpm/ft (USGS, 2001). In 2018, Arcadis conducted well yield testing at select wells screened within the Upper Connellsville sandstone, SRF system, Clarksburg shale, and Morgantown sandstone. The short duration yield tests had sustainable yields that were generally maintained for 30 to 60 minutes with complete testing duration of less than 4 hours and is further discussed in Section 3.1.3.2. Maximum pumping rates across all units were generally less than 1 gpm, except for stress relief fracture system wells MW-6, and MW-1809A (3.8 and 1.1 gpm, respectively). As a result, bedrock units found at the site are unlikely to be used regionally for public water supply.

3 MONITORING WELL NETWORK EVALUATION

An initial evaluation of the monitoring well network present at the Site was performed in May 2017 to determine if any of the wells were viable for continued use as part of the groundwater quality monitoring well network or retained for the purpose of water level measurement as part of a larger groundwater hydraulic monitoring well network. As part of this review, hydrogeologic conditions were evaluated to determine if the defined uppermost aquifer unit had an adequate monitoring well network. The evaluation was completed in accordance with 40 CFR 257.91 to have an established monitoring well network that effectively monitors the uppermost aquifer up gradient and down gradient of the Site. Following the initial evaluation, additional monitoring wells were installed and existing wells were re-developed. A summary table of well development activities is provided in **Appendix D**. Background groundwater quality is monitored at wells that are either hydraulically up gradient or hydraulically separated from the FAP. Down gradient wells are placed down gradient (horizontal and vertical) of the CCR unit boundary to monitor water quality.

3.1 Hydrostratigraphic Units

3.1.1 Horizontal and Vertical Position Relative to CCR Unit

The uppermost aquifer is the first encountered aquifer that is horizontally continuous across the site. The uppermost aquifer at the Site is defined by the saturated portion of the SRF system and includes the Upper Connellsville sandstone. The SRF is independent of lithologic unit and was examined to confirm hydraulic connection from ridge to valley using multiple lines of evidence that are discussed in Section 3.2.2. The Upper Connellsville sandstone and the SRF system laterally surrounds the FAP and occurs across the region. The SRF system extends vertically down ridges to the valley floors. The SRF system occurs in both the Conemaugh and Monongahela Formations and is hydraulically connected with deeper bedrock units (e.g., Clarksburg shale, Morgantown sandstone) via open fractures and horizontal bedding planes. The Clarksburg shale occurs throughout the FAP area and truncates at ridges. The Morgantown sandstone occurs below the base of the FAP and is present throughout the regional area. Vertical down gradient groundwater flow to deeper units (Clarksburg shale and Morgantown sandstone) likely occurs. However, groundwater yield in the Clarksburg shale and Morgantown sandstone are low and not sustainable, indicating that these secondary groundwater bearing zones are not aquifers at the Site. In similar SRF systems, groundwater is generally unconfined but water levels in wells can exhibit a semiconfined to confined behavior in valley floors and/or if low-transmissivity sediments (i.e. clay) are present (USGS 1981).

The upper limit of the uppermost aquifer is defined by the top of the potentiometric surface in the Upper Connellsville sandstone and SRF system, which is hydraulically connected to the saturated portion of the FAP. The potentiometric surface occurs at elevations as high as 865 ft amsl in the vicinity of the FAP. The base of the CCR unit occurs as low as 675 ft amsl. This is illustrated on cross sections A to A', B to B', and C to C' (**Figure 6**).

3.1.2 Overall Flow Conditions

To assist with understanding of overall flow conditions, Arcadis updated the original numerical groundwater flow model. A brief description of the revised groundwater flow model is provided in **Appendix E**. The primary model updates involved modification of the model structure to reflect the updated hydrostratigraphic interpretation from the visual three-dimensional CSM. The revised groundwater model was discretized vertically into ten (10) model layers to provide a vertical profile representative of the Site hydrostratigraphic framework. Additionally, a refined hydraulic conductivity zone was incorporated into the model to better represent the SRF system in all model layers and low permeable rock layers. The groundwater flow model was first re-calibrated to 2012 observed groundwater levels. Then, a transient model was built to dynamically simulate the hydraulic variation within the impoundment prior to and during the geosynthetic cap installation. A forward pathline analysis using MODPATH (Pollock, 2017) assisted in identifying the general flow patterns towards each monitoring well and surface water features. For this report, data collected during the October 22, 2018 groundwater gauging event were combined with simulated transient conditions for the corresponding time period to interpret groundwater flow patterns. The groundwater flow model also incorporates the understanding of water levels within the FAP that provides outward flow from the FAP to surrounding fractured units. Additionally, groundwater elevation contours within the Upper Connellsville sandstone and SRF were extrapolated from the modeled groundwater contours and flow directions using groundwater flow understanding based on the Appalachian conceptual site model for groundwater flow (USGS, 1981).

Vertical flow paths occur primarily within the SRF system along the ridges towards valleys, with horizontal contributions to surface water discharge and down valley groundwater flow. A multiple line of evidence approach was utilized to define the horizontal and vertical components of flow and is outlined in Section 3.2. Additional vertical flow paths also occur within the rock units, to a lesser extent.

Available groundwater elevations are summarized on **Table 1**. Simulated and extrapolated potentiometric contours for the Upper Connellsville sandstone and SRF system are depicted on **Figure 8A**. As shown, horizontal flow is outward from the pond to the Upper Connellsville sandstone in most areas except for the northwest where MW-10 currently appears to be up gradient. At lower elevations where the Upper Connellsville is absent, groundwater flow within the SRF then generally follows topography, ultimately reaching the nearest valley. Additional simulated potentiometric surfaces for deeper and hydraulicallyconnected secondary groundwater-bearing zones of the Clarksburg disconformity and Morgantown sandstone are provided on **Figures 8B** and **8C**, respectively. Flow contributions from shallow systems and potentially from the FAP are horizontal (radial flow from the pond) and vertical to the Clarksburg shale disconformity and vertical to the Morgantown sandstone.

3.1.3 Hydraulic Conductivity

The following subsections describe field implementation and data analysis of hydraulic testing conducted at the FAP (e.g., borehole packer tests, rock core permeability, slug tests, well yield tests). Historical hydraulic tests are briefly described and referenced. However, hydraulic conductivity estimates derived from historical test data were not generally consistent with more recent testing. Therefore, this report and evaluation products use current hydraulic conductivity estimates obtained during the 2017 and 2018 investigation.

3.1.3.1 Historical Aquifer Tests

The first six bedrock monitoring wells at the FAP (MW-1 through MW-6) were installed in 1995. Slug tests were performed at these wells and analysed to provide hydraulic conductivity estimates. Either a solid slug or a volume of water was used to induce the near instantaneous head change, depending on initial static water level. Packer tests were performed on open boreholes at three of these six wells prior to well installation (MW-2, MW-4, and MW-5). The objective of packer testing was to assess relative productivity of bedrock units. Hydraulic conductivity estimates were not generated as a result of packer tests, but packer test results were considered when selecting monitoring well screen intervals at these locations. Further details of slug test and packer test methodology and results are provided in *Groundwater Quality at the John E. Amos Power Plant* (EPRI, 1999).

3.1.3.2 Yield Testing

Well yield testing was conducted by Arcadis from March through July 2018 at select new and existing monitoring wells. Yield tests were completed by pumping each well at variable and steady state extraction rates and measuring the water level response in each well during and after pumping (recovery). Extraction rates were maintained using a submersible pump. High-resolution water level data were collected during both pumping and recovery phases via data-logging pressure transducers installed in each test well. Representative portions of drawdown and recovery data were selected for analysis and analyzed using AQTESOLV® for Windows® Version 4.50 (Duffield, 2007). The hydraulic parameter values were determined using applicable analytical solutions based on the observed response for a single (partially-penetrating) well under confined or unconfined conditions, as appropriate. Additional details on field methodology are provided in **Appendix A**.

Yield tests were completed at wells representing the uppermost aquifer (i.e., SRF and Upper Connellsville sandstone), as well as other secondary groundwater-bearing zones that are not aquifers (i.e., Clarksburg shale, Clarksburg disconformity, and Morgantown sandstone). The highest hydraulic conductivity was observed in the SRF system at MW-6 (37 ft/day). Wells MW-5, MW-8, MW-1801B, and MW-1801C did not maintain a flow rate and testing analysis was not completed. Hydraulic conductivity estimates derived from yield tests in the stress relief fracture system ranged from 0.1 to 37 ft/day. In the Upper Connellsville sandstone, hydraulic conductivity estimates ranged from 0.02 to 0.1 ft/day (the lower end of the SRF system range). A summary of yield testing results is provided on **Table 2** and solution reports with individual curve matches are provided in **Appendix F**.

3.1.3.3 Rock Core Permeability Testing

In addition to testing the hydraulic properties of all groundwater-bearing units, ex-situ permeability testing was performed to determine hydraulic properties of the lower-transmissivity units. Representative rock cores were selected from the non-fractured portions of the Morgantown sandstone, shale units underlying the Upper Connellsville sandstone and Clarksburg disconformity. Laboratory analysis included both horizontal and vertical steady-state permeability measurements via flexible wall permeameter consistent with ASTM D5084.

Average horizontal hydraulic conductivity estimates ranged from 4.08×10^{-5} ft/day to 1.36 x 10⁻⁴ ft/day. Average vertical hydraulic conductivity estimates were approximately ten times greater, ranging from 3.23

 x 10⁻⁴ ft/day to 9.07 x 10⁻⁴ ft/day. These values are approximately two to four orders of magnitude lower than hydraulic conductivity estimates within the fractured units. The test results confirm that flow within the Morgantown sandstone is attributable to secondary porosity within the fracture system and not from the primary (sandstone matrix) porosity. These low values were used to help refine the numerical groundwater flow model. A summary of rock core permeability testing is included on **Table 3**.

3.1.3.4 Packer Testing

Packer testing was conducted during installation of all monitoring wells installed in 2017 and 2018 except MW-1804 and MW-1807. The intent of injection packer testing is to estimate relative bedrock permeability for various borehole depth intervals to assist with water-bearing unit identification and monitoring well installation. Upon completion of each borehole, rock cuttings were flushed from the borehole with water in preparation for packer testing. Inflatable upper and lower rubber packers were then inserted to a specified 10-ft depth interval and inflated to create a seal. A riser pipe was attached to the top of the upper packer to provide a rigid, sealed standpipe with a pressure gauge at a known distance above the ground surface. Through this riser pipe, water was injected into the packer interval while measuring the gauge injection pressure, as well as injection volumes via a totalizing flowmeter.

During the packer tests, flow rates and borehole pressure were monitored at regular intervals. Test data was analyzed using the method described in the U.S. Department of the Interior Ground Water Manual (1977).

Packer tests were designed to target the Upper Connellsville sandstone, Clarksburg shale and associated sandstone interbeds, Morgantown sandstone, Birmingham Reds, and Graffton sandstone, in order of decreasing elevation. Most of the tested intervals did not accept the injected water, indicating that those intervals have very low transmissivity. There were no transmissive zones tested at borings MW-1802 and MW-1809. However, some lithologic intervals representing the SRF, Upper Connellsville sandstone, Clarksburg weathered shale, and Morgantown sandstone were determined targets due to the lateral extent and relative fracturing. Estimated hydraulic conductivities at borings MW-1801, MW-1803, and MW-1805, representing the Clarksburg weathered shale, Upper Connellsville sandstone, and Morgantown sandstone, respectively, were relatively low, ranging from 0.015 ft/day to 0.4 ft/day. Estimated hydraulic conductivities at borings MW-1806, MW-1808, and MW-1810 were generally higher, ranging from 0.4 ft/day to 1.9 ft/day. Packer test results are summarized on **Table 2** and packer testing logs are included in **Appendix F**.

3.1.4 Stress Relief Fracture System and Upper Connellsville

As described in Section 3.1.3, several different methods were used to quantify hydraulic conductivity at the Site. Estimated hydraulic conductivity values across all methodologies within the SRF system, which constitutes part of the uppermost aquifer, ranged from 0.1 to 37 ft/day. The geometric mean hydraulic conductivity for the SRF system was 2 ft/day (**Table 2**). Estimated hydraulic conductivity values across all methodologies within the Upper Connellsville sandstone, which constitutes the rest of the uppermost aquifer, ranged from 0.015 to 0.4 ft/day. The geometric mean hydraulic conductivity for the Upper Connellsville sandstone was 0.1 ft/day (**Table 2**).

3.1.5 Borehole Geophysics

Vertical geophysical logging, including temperature, temperature gradient, fluid resistivity, natural gamma, density, neutron, lateral resistivity, spontaneous potential, calliper, and single point resistance instrumentation, was completed during well installations at MW-2, MW-4, MW-5, MW-9, and MW-10 during installation activities in 1995 and 2002. Geophysical logging was also performed at boring 2008- 17 when it was installed in 2007, and at borings B-1401 and B-1402 when they were installed in 2014 including natural gamma, density, resistivity, and calliper instrumentation. Similarly, vertical geophysical logging was conducted at wells MW-1801, MW-1802, MW-1805, MW-1806, and MW-1808. The purpose of borehole geophysics was to assist with the identification of probable water-bearing units and well screen design, as well as to provide data for stratigraphic correlation of bedrock units across the site. Geophysical logs are included in **Appendix G**.

In general, the geophysical logging results were consistent with a sedimentary package of alternating shale and sandstone. **Figure 6** illustrates natural gamma logs that were critical to stratigraphic identification projected onto cross sections A-A', B-B', and C-C'. The Upper Connellsville sandstone was identified at wells MW-1801, MW-1802, MW-1805, MW-1806, and MW-1808 by a distinct left gamma shift at elevations between 800 ft amsl and 850 ft amsl. The Morgantown sandstone was identified using gamma logs at MW-6, MW-1801, MW-1802, MW-1806, and MW-1808. The gamma logs generally indicated that the Morgantown sandstone had a higher proportion of shale compared to the Upper Connellsville Sandstone.

In addition to gamma logs, the calliper logs were particularly useful for identifying and correlating the fissile, weathered shale unit within the Clarksburg shale. Wider borehole apertures were observed at wells MW-1801, MW-1802, MW-1805, MW-1806, and MW-1808 at an elevation near 700 ft amsl, which was interpreted to be caused by a high degree of weathering (**Appendix G**). Acoustic televiewer imaging systems emit an ultrasonic pulse and records the reflected acoustic signal. The transit time and amplitude of the reflected signal is recorded as a photographic-like image and allows for 360^o borehole imaging. Acoustic televiewer logs at the Site were used to identify depth, orientation (i.e. dip direction and angle), aperture, and description (e.g., major open joint, filled fracture, etc) of potential groundwater-bearing fractures of planar features along the entire length of each borehole. Acoustic televiewer data confirmed the high degree of weathering associated with the Clarksburg shale at wells MW-1801, MW-1802, MW-1806, MW-1808. In addition, they contributed to identification of the SRF and upper and lower surfaces of the Morgantown sandstone. Acoustic televiewer logs are included in **Appendix G**.

3.2 Uppermost Aquifer

3.2.1 CCR Rule Definition

Per 40 CFR 257.60(a), new CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must be constructed with a base that is located no less than 1.52 meters (5 ft) above the upper limit of the uppermost aquifer, or must demonstrate that there will not be an intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high conditions).

The CCR rule definitions for an aquifer and the uppermost aquifer as specified in 40 CFR 257.53 indicates an aquifer is a geologic formation capable of yielding usable quantities of groundwater to wells or springs while an uppermost aquifer is defined as the geologic formation nearest the natural ground surface that is an aquifer, as well as lower aquifers, that are hydraulically interconnected with this aquifer within the facility's property boundary. Upper limit is measured at a point nearest to the natural groundwater surface to which the aquifer rises during the wet season.

3.2.1.1 Common Definitions

An aquifer is commonly defined as a geologic unit that stores and transmits water (readily or at sufficient flow rates) to supply wells and springs (USGS, 2015; Fetter, 2001). The uppermost aquifer is considered the first encountered aquifer nearest to the CCR unit.

3.2.2 Identified Onsite Hydrostratigraphic Units

The identified shallowest Site hydrostratigraphic unit is the Upper Connellsville sandstone combined with the saturated portion of the SRF system, which are considered the uppermost aquifer at the Site. Regionally, the Upper Connellsville sandstone is not known to be the uppermost aquifer because its occurrence is variable based on elevation relative to the water table. The SRF is known to be regionally prevalent and is considered the regional uppermost aquifer system outside of primary unconsolidated fluvial valleys. The uppermost aquifer is not known to be used locally for groundwater supply or industrial water use.

Deeper secondary groundwater bearing zones are included for hydraulic water level monitoring only. While providing information about vertical hydraulic gradients and general groundwater conditions, these deeper units are not included as part of the monitoring well network and are not aquifers. The two deeper secondary groundwater-bearing zones identified during the investigation are the Clarksburg weathered shale/disconformity and the Morgantown sandstone (**Figure 6**). The Clarksburg shale is in contact with the FAP, receives outward flow, and is connected with the SRF system where the unit truncates into ridges or valleys (**Figure 8B**). The Morgantown sandstone is the first encountered secondary groundwater-bearing zone below the FAP that also extends laterally towards the main Teays and Kanawha valleys (**Figure 8C**). Both the deeper units are low in permeability. The recommended monitoring network is further explained in Section 4.

3.2.3 Hydraulic Connection – Multiple Lines of Physical Evidence Approach

A multiple lines of evidence approach was used to understand the hydraulics related to horizontal and vertical groundwater flow at the Site. The main purpose for this demonstration was to help understand the relative dynamics of the unlined FAP with respect to the surrounding water-bearing bedrock units and the SRF system. As stated above, most of the water-bearing units are low in permeability and some likely act as aquitards. The lines of evidence were explored to see if there are any indications that the low permeable units impede downward flow in relation to stratigraphic position and in relation to hydraulic connections with the SRF system.

At the Site, the Upper Connellsville sandstone and SRF system are determined to be the uppermost aquifer based on spatial occurrence and relative yield. However, the occurrence and elevation of the

arcadis.com

https://arcadiso365.sharepoint.com/sites/AEP_US_teamsite/ARCADIS_Only/Amos/FAP/CCR Reports/Well Network/1-Amos-CCR-FAP-Well Network-Text-2019-04-17.docx 16

Upper Connellsville sandstone relative to the groundwater table in surrounding areas is not known. The following lines of physical evidence support the understanding that the SRF system is connected from the ridgetops down to the valleys and is considered hydraulically connected with lateral units.

The physical lines of evidence that verify SRF hydraulics are:

- SRF and seeps observed at dam edges
- SRF and seeps observed in new spill way bedrock cut (near MW-1802A)
- SRF occurring independent of bedrock units at depths greater than 50 feet (MW-1809A and MW-1810A
- Fractures and seeps observed in abandoned decant tower tunnel
- Shallow shales are fractured on ridges and respond to injection packer testing completed in 2018
- Yield testing at SRF wells indicate sustainable flow rates of over 1 gpm at MW-2/MW-6 and over 0.5 gpm at MW-1809A

Based on this information and the positive correlation of these lines of evidence with the Appalachian conceptual site model for groundwater flow (USGS, 1981), the SRF system is hydraulically connected from ridges to valleys. A generalized cross section illustrating the features of an Appalachian SRF system is provided on **Figure 9**.

3.3 Review of Existing Monitoring Well Network

3.3.1 Overview

The Site was visited by Arcadis and AEP personnel on April 19, 2017 to review existing well network conditions and locations. The well network that existed at the time of that site visit was deficient, lacking both the quantity (i.e. 3 down gradient, 1 up gradient) and distribution to accurately represent background water quality and the quality of groundwater passing the waste boundary of the CCR Unit, per 40 CFR 257.91. Subsequently, installation of additional monitoring wells was completed from November 2017 through July 2018. A well construction table that summarizes the location, ground surface elevation, borehole depth, installation date, and associated well construction details of the monitoring well network is included as **Table 4**. As presented in **Table 4**, wells included in the monitoring network have been designated as up gradient, down gradient, or background. Additionally, some monitoring wells are designated for hydraulic monitoring only. Further details are provided in Section 4.1.

Spatially, the monitoring well network as illustrated on **Figure 10** is distributed across the entire Site and sufficiently monitors up gradient, down gradient, and background locations as specified in 40 CFR 257.91. The well screen intervals are located in either the SRF system and Upper Connellsville sandstone (i.e., uppermost aquifer), Clarksburg shale, or Morgantown sandstone. In general, monitoring wells are clustered so that multiple hydrostratigraphic units are screened at one location.

3.3.2 Gaps in Monitoring Network

As discussed in Section 3.3.1 of this report, gaps in the monitoring network were identified upon initial Arcadis review in April 2017. Following monitoring well installation described in this report and detailed in **Appendix A**, there are no gaps in the monitoring network. The recommended monitoring well network is described in Section 4.

4 RECOMMENDED MONITORING NETWORK

The network meets specifications stated in 40 CFR 257.91. Recommended groundwater monitoring objectives utilizing existing wells are further discussed and will provide an adequate understanding of seasonal and temporal fluctuations in groundwater quality, hydraulics, and groundwater flow at the Site.

4.1 Monitoring Well Network Distribution

The groundwater quality monitoring network at the Site consists of 16 wells as represented on **Table 4** and **Figure 10**. Additionally, all other available monitoring wells and piezometers listed on **Table 4** will be gauged, along with the 16 groundwater quality monitoring wells, for the purposes of groundwater flow analysis.

The determinations of up gradient, down gradient, and background location relative to the FAP, discussed below, is based on the most current groundwater modeling performed by Arcadis in 2018 and 2019, which is discussed in Section 3.1.2 and **Appendix E**.

4.1.1 Down Gradient Locations

Monitoring wells down gradient of the FAP in Little Scary Creek valley (MW-1, MW-2, MW-5, MW-6) and wells screened within the uppermost aquifer in the northern, eastern, and southern ridges surrounding the FAP (MW-1801A, MW-1804A, MW-1806A, MW-7, MW-8, and MW-9) constitute the down gradient groundwater quality monitoring locations (**Figure 10**).

4.1.2 Up Gradient or Background Locations

Based on recent groundwater modeling and the current understanding of groundwater flow directions, only one well (MW-10) within the uppermost aquifer immediately adjacent to the FAP is located hydraulically up gradient. Well MW-10 is not included in the groundwater quality monitoring network because it does not produce sufficient well yield for sample collection. Per 40 CFR 257.91, the owner of a CCR unit may collect background groundwater samples from wells that are not hydraulically up gradient of the CCR unit, provided that the other wells will provide an indication of background groundwater quality that is as representative or more representative than that provided by the upgradient wells.

Five wells located across Little Scary Creek valley to the southwest of the FAP constitute the background groundwater quality monitoring locations (**Figure 10**). Four of these wells are screened in the SRF portion of the uppermost aquifer (MW-1807A, MW-1808A, MW-1809A, and MW-1810A). An additional well is screened in the Clarksburg shale (MW-1807B) to provide background groundwater quality in a deeper secondary groundwater-bearing zone that is hydraulically connected to the SRF. These wells are all screened within the same hydrostratigraphic units that are present immediately surrounding the FAP and are therefore representative of background groundwater quality. Because Little Scary Creek provides a flow barrier between the background monitoring wells and the FAP, any groundwater impacts associated with the FAP are not likely to impact these five wells (**Figure 6**).

4.2 Well Construction

As discussed above in Section 3, gaps in the monitoring well network at the FAP were addressed by installation of 22 monitoring wells from November 2017 through July 2018. All monitoring wells were constructed in general accordance with West Virginia Department of Environmental Protection Title 47 Series 60 Monitoring Well Design Standards dated June 21, 2011 by a state licensed driller.

Installation details and field methods are provided in **Appendix A**. Well construction data for the monitoring well network is summarized on **Table 4**. Boring logs and the monitoring well completion diagrams are provided in **Appendix B**.

FLY ASH POND CCR GROUNDWATER MONITORING WELL NETWORK EVALUATION

PROFESSIONAL ENGINEER'S CERTIFICATION 5

I, Todd A. Minehardt, certify that this report was prepared under my direction and supervision, and that the information contained herein is true and accurate to the best of my knowledge. Based on my experience and knowledge of the site, the proposed groundwater monitoring system will be adequate to meet the requirements of 40 CFR Part 257.91(b), (c) and (e).

4. MINEHAND ODD

Printed Name of Registered Professional Engineer

Signature

 $\overline{\mathscr{N}}$

 $235/8$ Registration No.

Registration State Date

arcadis com https://arcadiso365.sharepoint.com/sites/AEP_US_teamsite/ARCADIS_Only/Amos/FAP/CCR Reports/Well Network/1-Amos-CCR-FAP-Well Network-Text-2019-04-17.docx 21

6 REFERENCES

- Acres American Incorporated Engineers. 1971. Appalachian Power Company, John E. Amos Plant, Fly Ash Retention Dam, Contact A2, Main Dam and Appurtenances, Geotechnical Data for Bidders.
- Acres American Incorporated. 1974. "Draft, Preliminary Design Report, John E. Amos Plant, Fly Ash Retention Dam, Stage 2." Prepared for Appalachian Power Company, November.
- Acres American Incorporated Engineers. 1975a. Appalachian Power Company, John E. Amos Plant, Fly Ash Retention Dam, Stage 2, Geotechnical Data for Bidders, Phase 3 Investigation, Volume 1.
- Acres American Incorporated Engineers. 1975b. Geotechnical Data for Bidders, Volume 2 (Phases 1 and 2 Investigations), John E. Amos Plant, Fly Ash Retention Dam, Stage 2.
- Acres American Incorporated Engineers. 1975c. Various Stage 2 construction drawings, John E. Amos Plant, Fly Ash Retention Dam, Stage 2.
- AEP. 2008. Amos FGD Haul Road Project, AEP Civil Engineering Laboratory, Logs of Borings.
- AEP. 2012. Application for Certificate of Approval, John E. Amos Plant, Fly Ash Dam WV I.D. #07911.
- Arcadis. 2016a. Ash Pond CCR Groundwater Monitoring Well Network Evaluation, Amos Plant, Winfield Road, Putnam County, Winfield, West Virginia.
- Arcadis. 2016b. FGD Landfill CCR Groundwater Monitoring Well Network Evaluation, Amos Plant, Winfield Road, Putnam County, Winfield, West Virginia.
- Banks Environmental Data, Inc. 2017. Water Well Report, AEP Water Well Inventory, Amos Plant, ES-124909.
- Cross, A.T and M.P. Shemel. 1956. Geology and Economic Resources of the Ohio River Valley in West Virginia, Part I Geology. West Virginia Geological Survey Volume XXII.
- CTech Development Corporation. 2017. Earth Volumetric Studio. https://www.ctech.com/
- Duffield, Glenn. 2007. AQTESOLV® for Windows® Version 4.50.
- EPRI. 1999. Groundwater Quality at the John E. Amos Power Plant, Putnam County, West Virginia, Prepared for American Electric Power Service Corp.
- Fetter, Charles Willard, and C. W. Fetter. 2001. Applied hydrogeology. Vol. 3. No. 3. Upper Saddle River: Prentice hall.
- GAI Consultants, Inc. 2006. Class F Industrial Landfill Facility Application, John E. Amos Landfill, John E. Amos Plant, Winfield, West Virginia, GAI Project Number: C040384.40.
- H.C. Nutting, A Terracon Company. 2008. Geotechnical Data Collection Report, Amos U3 Fly Ash Dam Raising Study, Saint Albans, Putnam County, West Virginia, HCN/Terracon Project No. N2075307.
- Latimer, W.J., et al. 1911. Jackson, Mason and Putnam Counties, Volume 1, County Reports and Maps. Wheeling News Litho. Company.
- Orsborn, N.P. 2008. Deposition and Structural Features of the Basal Morgantown Sandstone of the Casselman Formation (Pennsylvanian) of the Greater Pittsburgh Region. MS Thesis.

- Pollock, D.W. 2017. MODPATH v7.2.01: A particle-tracking model for MODFLOW: U.S. Geological Survey Software Release, 15 December 2017, http://dx.doi.org/10.5066/F70P0X5X.
- Reger, D.B., et al. 1918. Barbour and Upshur Counties and Western Portion of Randolph, Volume 1, County Reports and Maps. Wheeling News Litho. Company.
- Southeast Regional Climate Center. 2017. Historical Climate Summaries, Winfield Locks, West Virginia, http://www.sercc.com, Query conducted by Mr. Josh Roberts of Arcadis on May 10, 2017.
- Stantec Consulting Services Inc. 2011. Dam and Dike Inspection Report, John Amos Power Station, St. Albans, West Virginia.
- Stantec Consulting Services Inc. 2012. Design Basis Report, John E. Amos Plant, Fly Ash Pond Closure, Appalachian Power Company, Putnam County, West Virginia.
- Terracon. 2016. Construction Certification Report, Amos Plant Fly Ash Pond Closure, 2015 Phase I Construction, Putnam County, West Virginia, Terracon Project Number: N4159048, DRAFT.
- Terracon. 2017a. Construction Certification Report, Amos Plant Fly Ash Pond Closure, 2016 Phase II Construction, Putnam County, West Virginia, Terracon Project Number: N4159048, DRAFT.
- Terracon. 2017b. Construction Certification Report, Amos Plant Fly Ash Pond Closure, 2017 Phase III Construction, Putnam County, West Virginia, Terracon Project Number: N4159048.
- UGSS. 1981. Hydrologic Effects of Stress-Relief Fracturing in an Appalachian Valley. Water-Supply Paper 2177.
- USGS. 2001. Aquifer-Characteristics Data for West Virginia. Water-Resources Investigations Report 01- 4036
- USGS. 2015. Aquifers and Groundwater. Available online at www.usgs.gov.

TABLES

NOTES:

Monitoring wells are arranged by bedrock unit in order of increasing depth

Elevation in NAVD 88, feet above mean sea level (ft amsl)

bls = Below land surface

bTOC = Below top of casing

GW Elev = groundwater level elevation

NA = not available

-- = not measured

a = 1983 West Virginia State Planar Coordinates NAD83/NAVD88. Surveyed in July 2018

b = Source: GAI Consultants. March 2006. Class F Industrial Landfill Facility Application, John E. Amos Landfill, Volume 1, Appendix K - Monitor Well Construction Diagrams. TOC elevation was 883.0 before 10/20/94.

c = Survey data and boring log not available, coordinates estimated based on AEP DWG. No. 13-30500-11-E. TOC elevation was 882.1 before 10/20/94.

d = The April 2018 water level at DW-2 was measured on 4/6/2018, not 4/3/2018

ARCADIS

NOTES:

¹ Packer testing analysis analyzed using U.S. Department of the Interior, Bureau of Reclamation, 1977. Ground Water Manual, A Water Resources Technical Publication, pp. 258-264

 2 Recovery results analyzed by the Theis solution; correction of drawdown data applied for unconfined conditions (s'=s-s²/2b; where s is drawdown and b is aquifer thickness)

Kruseman, G.P. and Ridder, N.A., 1990. Analysis and evaluation of pumping test data. Analysis and evaluation of pumping test data., (47)

Theis, C.V., 1935. The relation between the lowering of the piezometric surface and the rate and duration of discharge of a well using groundwater storage, Am. Geophys. Union Trans., vol. 16, pp. 519-524

Birsoy, Y.K. and W.K. Summers, 1980. Determination of aquifer parameters from step tests and intermittent pumping, Ground Water, vol. 18, no. 2, pp. 137-146.

³ Drawdown results analyzed by the Cooper-Jacob solution; storage result not reliable due to test duration

 Cooper, H.H. and C.E. Jacob, 1946. A generalized graphical method for evaluating formation constants and summarizing well field history, Am. Geophys. Union Trans., vol. 27, pp. 526-534 4 Flow rate is average flow rate for borehole packer tests and maximum sustain flow rate (yield) for yield tests

amsl = above mean sea level (NAVD88)

b = thickness of packed interval or thickness of tested zone

SS = sandstone

SRF = stress relief fracture system

N/A = not available

-- = not applicable

 $T =$ transmissivity

K = hydraulic conductivity

ft = feet

gpm - gallons per minute

psi = pounds per square inch

cm/sec = centimeters per second

bgs = below ground surface

Table 3Summary of Rock Core Permeability Testing Results AEP Amos Generating Plant - Fly Ash Pond Winfield, West Virginia

NOTES:

Horizontal and vertical permeability and hydraulic conductivity measured following ASTM D5084

Confining pressure during all tests was 25 pounds per square inch (psi)

Effective is with as-received pore fluids in place

Permeability to water and hydraulic conductivity measured ast saturated conditions

 $ft = feet$

cm = centimeter

s = second

NOTES:

a = 1983 West Virginia State Planar Coordinates NAD83/NAVD88. Surveyed in July 2018.

Piezometers pre-cap surface elevations provided.

ft = feet

bgs = below ground surface

amsl = above mean sea level

-- = not applicable SRF = Stress Relief Fracture System U = Upper Connellsville sandstone C = Clarksburg

M = Morgantown sandstone and adjacent shale

FIGURES

Z:\GISProjects_ENV\AEP\Amos\mxd\Impoundment\Report\F2_AmosRegionalMap.mxd 1/14/2019 9:27:48 AM City: CITRIX_Div/Group: IM/DV_Created By: K.I
OH015976.0009.00001 (Mountaineer Ash Pond)
Z:\GISProjects_ENV\AEP\Amos\mxd\Impoundm

City: CITRIX Div/Group: IM/DV Created By: K.Ives Last Saved By: webb

as

:48 AM ä

OH015976.0009.00001 (Mountaineer Ash Pond)

-
-
-
-
-
-
-
-
-
- GRAPHIC SCALE
	-

- Project (Project #)
- City: Div/Group: Created By: Last Saved By: acarlone
	- -
-
-
-
-
-
-
-
-
-

City: Div/Group: Created By: Last Saved By: akens Ō Project (Project #) City: Div/Group
Project (Project #
Z:\GISProjects\

-
-
-
-
-
-
-
-
-
-
-
-
-
-
-

Z:\GISProjects_ENV\AEP\Amos\mxd\Impoundment\Report\F5_Layout_CrossSectionLocationRevJan2019.mxd 3/29/2019 7:44:22 AM

XREFS:

City: Div/Group: Created By: Last Saved By: acarlone Project (Project #)

City: Div/Group: Created By: Last Saved By: acarlone Project (Project #)

- -
	-
	- Access Road
-
-
-

APPENDIX A

Field Methodology

APPENDIX A

FIELD METHODOLOGY

Based on the recommended well network modifications, the following generalized tasks were completed:

- Installation of 22 bedrock borings
- Installation and development of 22 new monitoring wells
- The redevelopment of 9 existing monitoring wells

Arcadis provided oversight for drilling of 22 bedrock borings that resulted in installation of 22 monitoring wells by an AEP-licensed drilling crew. Implementation of the field activities began with the initial utility clearance activities beginning November 2017. Additional utility location was completed in 2018. Drilling operations began on December 4, 2017 and ended on May 31, 2018. Well development and yield testing began in April 2018 and continued to July 2018.

Staking, Surveying, and Utilities Clearance

AEP oversaw the installation of approximately 20 feet by 20 feet gravel well pads to provide a stable area and working room for the drill rig to drill and install the new monitoring wells. AEP also repaired and added access roads to allow access to each of the new well locations. All proposed new monitoring well locations were staked by an AEP subcontractor, DLZ, prior to utility clearance and commencement of drilling. DLZ surveyed the spatial northing and easting coordinates as well as the ground surface elevation of each staked monitoring well location prior to drilling. The accuracy of elevation measurements was at least to the nearest 0.01 foot. An Arcadis representative contacted 8-1-1 to assess the presence of underground utilities near the new monitoring well and boring locations prior to drilling activities. AEP completed a plant dig permit, which identified private plant utilities near the new monitoring well and borings locations. Arcadis retained the services of a utility locating subcontractor (The Underground Detective) to perform a geophysical survey (e.g. ground penetrating radar, electromagnetic survey, etc.) over an area of 25 feet by 25 to locate utilities at each new monitoring well location. The private utility locator also used an air knife/soil vacuum extraction system to pre-dig the proposed borehole locations to a diameter at least 10 percent larger than the largest diameter tooling to be used during drilling and to a depth of 8 feet below the ground surface (bgs) or to bedrock, whichever was encountered first.

Decontamination

All down-hole tools or equipment were decontaminated in accordance with ASTM D5088 prior to the start of drilling and between each borehole location. At a minimum, the tooling was washed with detergent solution followed by a potable water rinse. The use of a pressure washer was used when possible. Containerization was not required for decontamination water because all work was completed outside of the Fly Ash Pond area and not considered contaminated. Water for decontamination or drilling was potable and obtained from the AEP Amos Plant.

Borehole Advancement and Stratigraphy/Lithology

Bedrock boreholes began by using standard hollow-stem auger methods with a minimum 8.25" inner diameter auger in accordance with ASTM D5784 until the soil-rock interface was encountered. Continuous spit-spoon sampling and standard penetration testing was performed in accordance with ASTM D1586 until bedrock was encountered. A minimum 6-inch diameter PVC surface casing was temporarily set 2 feet into the competent bedrock prior to beginning rock coring. Bentonite chips were placed in the annulus between the borehole and the surface casing to ground surface, serving as a temporary seal around the surface casing during drilling operations. The chips were placed in a controlled manner to prevent contamination of the well. Chips were hydrated periodically during placement. The bentonite annulus seal was allowed to set for approximately 12 hours (overnight) before continuing with rock coring. The 6-inch PVC casing was removed upon installation of the permanent well casing.

Rock core samples were completed with NQ sized wireline system in accordance with ASTM D 2113-93. Upon completion of coring, the bore holes were enlarged to 6" diameter using rotary drilling methods in accordance with ASTM D 5783-95.

Arcadis logged all geologic samples collected during the drilling process for bedrock monitoring wells. Field logging of the soil and rock samples were performed in accordance with ASTM D5434-12. Unconsolidated soils were classified under the Unified Soil Classification System (USCS), while rock core logging was classified in accordance with the *Midwest Geosciences Group; Field Guide for Rock Core Logging and Fracture Analysis*. Boring logs and well construction details for all installations completed during this scope of work are provided in **Appendix B**. No unconsolidated soil samples were collected. Rock coring was completed continuously using a NQ wireline system that retrieved a 2-inch diameter core to the termination depth. The borehole was flushed to remove any remaining drilling debris.

Packer Testing and Downhole Geophysics

To assist in locating the discrete water-bearing units, a combination of packer testing and downhole geophysical surveys was conducted.

Prior to geophysical logging, single-straddle packer tests were conducted on select intervals of the open core holes. Final determination of intervals for packer testing was determined based on review of lithologic boring logs, and consultation between Arcadis and AEP. At a minimum, straddle packer testing was completed at the anticipated depth interval corresponding to monitoring well screen depths. Upper and lower inflatable rubber packers attached to a rigid riser pipe were inserted to the specified test interval. Once at the test interval, the rubber packers were inflated to create a seal. The riser pipe was fitted with a pressure gauge at a known and documented distance above the ground surface, as well as a totalizing flow meter. Water was injected through the riser pipe at a constant pressure, while the Arcadis representative measured and recorded totalizing flow volume and gauge pressure at specified time intervals for a total of up to 30 minutes per each pressure. At the completion of the straddle packer test, water injection ceased and gauge pressure was monitored until it returned to pre-test conditions. Once gauge pressure stabilized, the packers were deflated and either removed from the borehole or to the next specified depth interval to repeat the straddle packer test procedure. Straddle packer test data was analyzed according to the method described in U.S. Department of the Interior, Bureau of Reclamation, 1977. Ground Water Manual, A Water Resources Technical Publication, pp. 258-264. After packer testing, the core hole was reamed to 8-inch

arcadis.com

diameter using air rotary drilling methods and water injections to remove cuttings in accordance with ASTM D 5782-95-Use of Direct Air Rotary Drilling for Geoenvironmental Exploration and the Installation of Subsurface Water Quality Monitoring Devices. The bedrock boreholes were flushed of cuttings at the completion of reaming using potable water. The final borehole depth was confirmed via tagline measurement following borehole flushing.

Geophysical logging occurred upon completion of packer testing, after the borehole was reamed to 8" diameter. These activities would typically be completed in the reverse order. However, this sequencing was necessary due to a highly weathered bedrock unit that continuously collapsed at many of the boreholes around a depth of approximately 200' bgs. Geophysical logging was performed by an AEP-selected contractor, Marshall Miller & Associates. Five boreholes were selected to undergo downhole geophysical logging. The purpose was to assist with well design and obtain more detailed information on transmissive groundwater zones of the saturated units (e.g., bedrock type, fractures, permeability and porosity). The locations were selected based on lithology, packer testing results, saturated unit and location. The following suite of instrumentation was included during geophysical logging:

- Acoustical Televiewer
- Natural gamma, density, guard resistivity, caliper
- Natural gamma, temperature, delta temperature, fluid conductivity, 16-64 normal resistivity, lateral resistivity, spontaneous potential, single point resistance.
- Natural gamma, neutron porosity, single point resistance, deviation.

Data from the geophysical testing was analyzed by Marshall Miller and Arcadis and is presented in **Appendix G**.

Monitoring Well Installation and Construction

Monitoring well installation and construction was completed in accordance with the AEP- approved work plan prepared by Arcadis following an initial review of the Site monitoring well network. The work plan was prepared using West Virginia Department of Environmental Protection Title 47 Series 60 Monitoring Well Design Standards dated June 21, 2011 and American Society of Testing Material (ASTM) standards, where referenced, as guidance. Arcadis directed the drilling and installation of the identified up and down gradient monitoring wells. AEP installed the wells with some late support from DLZ who was directly contracted through AEP. Drilling activities began on December 4, 2018. Prior to beginning work, daily health and safety meetings were held each morning, including a thorough discussion of the day's scope of work, identified hazards, hazard mitigation, and completion of the AEP Job Safety Analysis documentation in the presence of AEP staff. Health and safety documentation was retained by both Arcadis and AEP.

Based on the field conditions, Arcadis directed AEP regarding the total drilling and well completion depths, well construction configuration, and well materials to be used. Screened intervals for bedrock monitoring wells targeted the Upper Connellsville sandstone, stress relief fracture system, Clarksburg shale disconformity, and Morgantown sandstone. Final well depths and screened intervals are included in **Table 4**.

arcadis.com

All monitoring wells were constructed in general accordance with West Virginia Department of Environmental Protection Title 47 Series 60 Monitoring Well Design Standards dated June 21, 2011.

Bedrock monitoring wells were constructed of 2-inch Schedule 40 PVC risers and screens. The well was double-cased, with a 6-inch PVC surface casing installed into the upper two feet of bedrock. The surface casing was grouted in place using a bentonite grout. Well screens were constructed of 20 slot (0.020 ft screen openings) PVC. A primary filter pack of Global® #5 sand was placed across the screened interval to approximately 2 feet above the screen, followed by approximately 1 foot of secondary (finer gradation) filter pack composed of Global® #6 sand.

Boring logs and well construction diagrams are provided in **Appendix B**. **Table 4** provides a summary of the well construction details of all wells in the current monitoring well network.

Monitoring Well Development

Well development was completed at all newly-installed wells, as well as existing wells to be retained in the monitoring well network. At existing wells, the wells were purged with a bladder pump to remove dislodged material from the well. Well development at new wells was performed a minimum of 48 hours after the completion of well construction. The static water level was measured in the well prior to initiation of development. All wells were developed through a pump and surge method in accordance with West Virginia Department of Environmental Protection Title 47 Series 60 Monitoring Well Design Standards dated June 21, 2011. The well was initially purged with a pump to remove loose material and fines from the well. Due to poor water production and quality in the new wells, all of the wells had to be developed multiple times over multiple days. Wells where visual clarity remained poor during pumping were flushed using potable water in an attempt to remove the sediment in the sand pack and well.

New wells that did achieve good visual clarity (i.e., were clear) from development and flushing underwent a final pumping cycle to meet the following criteria: 1) a minimum of 10 casing volumes were purged from the well, and 2) field water quality parameters including temperature, pH, conductivity, oxidation-reduction potential, and turbidity were stable within applicable criteria (temperature stabilizes within ±0.50C, pH stabilizes within ±0.2 units, conductivity stabilizes within ±3 percent, and turbidity is less than 100 nephelometric turbidity units). Well development data are included as **Appendix D**.

APPENDIX B

Boring/Well Construction Logs

Electric Power Research Institute, 1999

Boring Logs

MW-1 to MW-10

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

TIME DATE

AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING

JOB NUMBER

PROJECT **EPRI GROUND WATER STUDY - AMOS** BORING START **THE AMOS** BORING FINISH 7/27/95

BORING NO. 5 <u>D=MW-01</u> DATE 2027/07 SHEET 2 OF 5 COMPANY **D=MW-01 2** OF

SHEET BORING FINISH

JOB NUMBER __________________________________

EPRI GROUND WATER STUDY - AMOS PROJECT

BORING START **D=MW-01 3** OF COMPANY BORING NO. <mark>D=MW-01</mark> DATE

BORING FINISH **7/27/95**

8/27/07 SHEET **5**

LOG OF BORING AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START A REPORT OF BORING FINISH **7/27/95**

BORING NO. 5 D= **MW-01** DATE 28/27/07 SHEET 2 OF 5

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START A RORING FINISH **7/27/95**

 $\overline{}$

SHEET **5 5** DATE **D=MW-01** OF **8/27/07** BORING NO.

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

COMPANY

PROJECT EPRI GROUND WATER STUDY - AMOS

COORDINATES **N 529,941.0 E 1,724,235.0** PIEZOMETER TYPE

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

PROJECT LEPRI GROUND WATER STUDY - AMOS TERRING START 27/12/95 ADRING FINISH 27/27/95

BORING NO. 5D=MW-02 DATE $\frac{8}{27/07}$ SHEET 2 OF 6

1

10 SS

NQ

44.3 44.1

49.8 44.3

Continued Next Page

CLAYEY SHALE, DARK YELLOWISH BROWN

overburden was fill.

STATE OF STRAIGHT

CLAY SHALE, Bluish gray (5B 5\1),rock pieces.

(10YR 4\2),very soft, weathered.

45

5.5 1"

55

COMPANY

JOB NUMBER

EPRI GROUND WATER STUDY - AMOS PROJECT LEPRI GROUND WATER STUDY - AMOS TORING START NTA2095 ADRING FINISH THE TATH THE TASH THE REPORT THE RE

DATE <u>8/27/07</u> SHEET 3 OF 6 **D=MW-02** OF COMPANY BORING NO. **D=MW-02** DATE **8/27/07**

<u> Tanzania de la pro</u>

٦

EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-7/12/95$ BORING FINISH $-7/27/95$

8/27/07 SHEET **6** DATE **D=MW-02 4** OF BORING NO.

훕 **AEP**

JOB NUMBER

 $\overline{}$

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-7/12/95$ BORING FINISH $-7/27/95$

BORING NO. D=MW-02 DATE $\frac{8/27/07}{\ }$ sheet 5 of 6

 \overline{R} **AEP**

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-7/12/95$ BORING FINISH $-7/27/95$

BORING NO. 5D=MW-02 DATE $\frac{8}{27/07}$ SHEET 6 of 6

EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

PROJECT LEPRI GROUND WATER STUDY - AMOS RORING START COMPANY JOB NUMBER

COORDINATES **N 530,928.0 E 1,728,546.0**

LOG OF BORING AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

PROJECT **EPRI GROUND WATER STUDY - AMOS**

D=MW-03 DATE BORING START

BORING FINISH **8/10/95**

2 OF COMPANY BORING NO. **D=MW-03** DATE <mark>8/27/07</mark> SHEET

45

AEP EPRI_AMOS.GPJ AEP.GDT 8/27/07 EPRI_AMOS.GPJ ĄEP

Continued Next Page

13

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START A REPORT OF BORING FINISH **8/10/95**

3 DATE SHEET **D=MW-03** OF **13 8/27/07** BORING NO.

 $\overline{}$

AEP

LOG OF BORING AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

PROJECT **EPRI GROUND WATER STUDY - AMOS**

D=MW-03 DATE BORING START **4** OF COMPANY BORING NO.

13 SHEET**8/27/07** BORING FINISH

8/10/95

┯
LOG OF BORING AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START A REPORT OF BORING FINISH **8/10/95**

BORING NO. $D=MW-03$ date $8/27/07$ sheet 5 of 13

JOB NUMBER

PROJECT **EPRI GROUND WATER STUDY - AMOS** BORING FINISH **8/10/95**

D=MW-03 DATE BORING START **6** OF **13** COMPANY BORING NO. 8D JON 100 DATE 2012 7107 SHEET

Continued Next Page

STANDARD STANDARD STANDARD STANDARD STANDARD STANDARD STANDARD STANDARD STANDARD STANDARD STANDARD

DARK GRAY (N3) TO DARK REDDISH BROWN (10R3/4) CLAY SHALE, LAMINATIONS, SLIGHT TO MODERATELY

WEATHERED.

LOG OF BORING AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START A REPORT OF BORING FINISH **8/10/95**

D=MW-03 DATE **7** OF **13 8/27/07** SHEET BORING NO.

AEP

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START A REPORT OF BORING FINISH **8/10/95**

8 13 DATE **D=MW-03** OF BORING NO. **8/27/07** SHEET

LOG OF BORING AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION

 $\overline{}$

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START A REPORT OF BORING FINISH **8/10/95**

D=MW-03 DATE **9** OF **13** BORING NO. **8/27/07** SHEET

EPRI_AMOS.GPJ AEP.GDT 8/27/07 **AEP**

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

EPRI GROUND WATER STUDY - AMOS BORING START PROJECT

BORING NO. **D=MW-03** DATE **8/27/07 D=MW-03** OF COMPANY

BORING FINISH **8/10/95**

10 SHEET **13**

AMOS GP.I AFP GDT 8/27/07 EPRI **AEP**

BORING NO. $D=MW-03$ date $8/27/07$ sheet 11 of 13

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START A REPORT OF BORING FINISH **8/10/95**

Continued Next Page

 $\begin{array}{c} \bullet \\ \bullet \\ \bullet \\ \bullet \end{array}$ $|\cdot|$

EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP

LOG OF BORING AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

EPRI GROUND WATER STUDY - AMOS BORING START PROJECT

 $\overline{}$

DATE **D=MW-03** OF COMPANY BORING NO. $D=MW-03$ date $8/27/07$ sheet 12 of 13

BORING FINISH **8/10/95**

EPRI AMOS.GPJ AEP.GDT 8/27/07 AEP EPRI_AMOS.GPJ AEP.GDT 8/27/07 **AEP**

Continued Next Page

12

JOB NUMBER

EPRI GROUND WATER STUDY - AMOS BORING START

 $\overline{}$

BORING NO. **D=MW-03** DATE_<mark>8/27/07</mark> SHEET <mark>13 </mark> OF **13** COMPANY **D=MW-03**

BORING FINISH **8/10/95**

8/27/07 SHEET **13**

PROJECT

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

COMPANY JOB NUMBER

PROJECT **EPRI GROUND WATER STUDY - AMOS 7/18/95**

SVSTEM COORDINATES **N 530,922.0 E 1,728,552.0 STATE PLANE 1.9**

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START 27/18/95 A BORING FINISH 27/20/95

<u>BORING NO. D=MW-04</u> DATE 8/27/07 SHEET 2 0F 13

 $\overline{}$

EPRI **AEP**

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS TERRING START 27/18/95 ADRING FINISH 27/20/95

13 BORING NO. **D=MW-04** DATE 28/27/07 SHEET 2 OF

AEP

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-7/18/95$ BORING FINISH $-7/20/95$

4 13 DATE SHEET **D=MW-04** OF BORING NO. **8/27/07**

JOB NUMBER

EPRI GROUND WATER STUDY - AMOS PROJECT LEPRI GROUND WATER STUDY - AMOS TERRING START 27/18/95 ADRING FINISH

DATE 2027/07 SHEET 5 OF 13 **D=MW-04** OF COMPANY **8/27/07 7/20/95** BORING NO.

Continued Next Page

EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-7/18/95$ BORING FINISH $-7/20/95$

13 BORING NO. **D=MW-04** DATE 28/27/07 SHEET 6 OF

EPRI AMOS.GPJ AEP.GDT 8/27/07 AEP

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START 27/18/95 A BORING FINISH 27/20/95

EPRI AMOS.GPJ AEP.GDT 8/27/07 AEP

JOB NUMBER

COMPANY

AEP

PROJECT FE**PRI GROUND WATER STUDY - AMOS** TERRING START THE 27/18/95

 $\overline{}$

13 8/27/07 D=MW-04 8 OF DATE BORING NO. SHEET

 \mathbf{L}

 \mathbb{R}

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS TERRING START 27/18/95 ADRING FINISH 27/20/95

D=MW-04 13 DATE **9** OF BORING NO. SHEET **8/27/07**

JOB NUMBER

EPRI GROUND WATER STUDY - AMOS PROJECT LEPRI GROUND WATER STUDY - AMOS TERRING START 27/18/95

DATE 2027/07 SHEET 10 OF 13 **D=MW-04** OF COMPANY BORING NO. **D=MW-04** DATE **8/27/07** BORING FINISH **7/20/95**

EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP

JOB NUMBER

PROJECT LEPRI GROUND WATER STUDY - AMOS TERRING START 27/18/95 ADRING FINISH 27/20/95

SHEET **13 D=MW-04 11** OF DATE BORING NO. **8/27/07**

EPRI AMOS.GPJ AEP.GDT 8/27/07 AEP EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP

COMPANY

JOB NUMBER

EPRI GROUND WATER STUDY - AMOS PROJECT LEPRI GROUND WATER STUDY - AMOS TERRING START 27/18/95

DATE **8/27/07** SHEET **12 D=MW-04** SHEET OF COMPANY **8/27/07** SHEET **12** OF **13** BORING FINISH BORING NO. **7/20/95**

AEP

AMERICAN ELECTRIC POWER SERVICE CORPORATION AEP CIVIL ENGINEERING LABORATORY LOG OF BORING

JOB NUMBER

PROJECT LEPRI GROUND WATER STUDY - AMOS TERRING START 27/18/95 ADRING FINISH 27/20/95 **BORING NO. D=MW-04** DATE $\frac{8/27/07}{\ }$ sheet 13 of 13

COMPANY

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

TIME

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-7/11/95$ BORING FINISH $-7/26/95$

BORING NO. **5 8/27/07** SHEET **D=MW-05 2** DATE OF

 $\overline{}$

AMERICAN ELECTRIC POWER SERVICE CORPORATION AEP CIVIL ENGINEERING LABORATORY LOG OF BORING

JOB NUMBER

COMPANY

PROJECT FEPRI GROUND WATER STUDY - AMOS TERRING START THALL 2014

8/27/07 SHEET OF **D=MW-05 3** DATE BORING NO. BORING FINISH 7/26/95

5

SAMPLE **STANDARD** RQD DEPTH RECOVERYSAMPLE GRAPHIC SAMPLE NUMBER U S C S DEPTH TOTAL LENGTH **PENETRATION** SOIL / ROCK DRILLER'S **WELL** $\frac{1}{2}$ IN IN FEET RESISTANCE % IDENTIFICATION NOTES FEET FROM TO BLOWS / 6" LIGHT OLIVE GRAY (5YR 4/2), SOFT, SOME IRREGULAR BEDDING PLANES 50 MO 49.8 56.5 54 4 NQ 49.8 56.5 47 51.0 Regained drill water 55 5 NQ 56.5 59.8 2.55 50 **SAME EXCEPT VERY SOFT** 56.5 Fracture = 7 60 **CLAYEY SILT**, DARK YELLOWISH BROWN NQ 59.8 67.3 7.5 96 6 $(10$ yr 4 $\sqrt{2}$), MOIST - WET **SAME**, VERY WEATHERED, SOFT **CLAY SHALE**, PALE BROWN (5YR 5\2), SLIGHTLY WEATHERED 65 **SAME**, SOME MODERATELY WEATHERED, **MARKET SERVER SOFT** NQ 2.5 40 **SAME**, VERY WEATHERED, VERY SOFT 7 | NQ | 67.3 | 69.8 AEP.GDT 8/27/07 AEP EPRI_AMOS.GPJ AEP.GDT 8/27/07 **SAME**, MODERATELY WEATHERED, SOFT 68.0 Fracture = 5 **SHALE**, MEDIUM GRAY (N5), SOFT. 70 **SAME** 69.8 78.8 6.8 64 8 $\overline{M\Omega}$ **CLAY SHALE**, PALE BROWN (YR 5\2) AND k 71.6 Fracture = 12

EPRI AMOS.GPJ ĄEP

JOB NUM

COMPAN

9

PROJEC[®]

91.0 Top sand.

EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP

90.8

99.8

NQ 13

Continued Next Page

SHALE, MEDIUM BLUISH GRAY (5B 5\1), WITH SOME INTERBEDDED BROWNISH GRAY (5YR 4\1) COLOR, SLIGHTLY

WEATHERED, SOFT

95

100

9.0

AMERICAN ELECTRIC POWER SERVICE CORPORATION AEP CIVIL ENGINEERING LABORATORY LOG OF BORING

JOB NUMBER

PROJECT F**EPRI GROUND WATER STUDY - AMOS** TERRING START THE 17/11/**95 EPRI GROUND WATER STUDY - AMOS** BORING START **7/26/95** BORING FINISH

BORING NO. 5 D= **MW-05** DATE 28/27/07 SHEET 25 OF 5 COMPANY **D=MW-05 5**

 $\overline{\mathsf{I}}$

AEP

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

COMPANY JOB NUMBER

PROJECT FE**PRI GROUND WATER STUDY - AMOS** ADRING START **8/20/95**

COORDINATES **N 531,266.0 E 1,724,352.0**

AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING

JOB NUMBER

PROJECT FE**PRI GROUND WATER STUDY - AMOS** TERRING START **8/20/95 EPRI GROUND WATER STUDY - AMOS** BORING START $\frac{8/20/95}{20}$ BORING FINISH $\frac{8/21/95}{20}$

BORING NO. **D=MW-06** DATE <mark>8/27/07 SHEET 2 OF 5</mark> COMPANY **D=MW-06** DATE **2** OF

BORING FINISH

SHEET

EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP EPRI_AMOS.GPJ AEP.GDT 8/27/07 **AEP**

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-$ 8/20/95 A BORING FINISH 28/21/95

BORING NO. D=MW-06 DATE $\frac{8/27/07}{\ }$ sheet 3 of 5

EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP

LOG OF BORING AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

EPRI GROUND WATER STUDY - AMOS BORING START PROJECT FE**PRI GROUND WATER STUDY - AMOS** TERRING START **8/20/95**

DATE **D=MW-06** OF COMPANY **4 5 8/27/07** BORING FINISH BORING NO. **8/21/95** SHEET

EPRI AMOS.GPJ AEP.GDT 8/27/07 AEP

LOG OF BORING AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

PROJECT **EPRI GROUND WATER STUDY - AMOS 8/20/95**

D=MW-06 date 2027/07 Sheet 5 of 5 BORING START SHEET **5** OF COMPANY BORING NO. **D=MW-06** DATE **8/27/07** BORING FINISH **8/21/95**

AMERICAN ELECTRIC POWER SERVICE CORPORATION AEP CIVIL ENGINEERING LABORATORY LOG OF BORING

RECORDER REB

EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP EPRI_AMOS.GPJ AEP.GDT 8/27/07 **AEP**

JOB NUMBER

AIR HAMMER

 $\overline{8"}$

AMERICAN ELECTRIC POWER SERVICE CORPORATION AEP CIVIL ENGINEERING LABORATORY LOG OF BORING

JOB NUMBER

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-1/23/02$ BORING FINISH $-1/30/02$

 $\overline{}$

80RING NO. D=MW-08 DATE $\frac{8/27/07}{\ }$ sheet 2 of 7

COMPANY

JOB NUMBER

EPRI GROUND WATER STUDY - AMOS PROJECT F**EPRI GROUND WATER STUDY - AMOS** TERRING START 1/23/02

DATE **8/27/07** BORING START **D=MW-08** SHEET **3** OF COMPANY BORING NO. **D=MW-08** DATE <mark>8/27/07 SHEET 3 OF 7</mark> BORING FINISH **1/30/02**

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-1/23/02$ BORING FINISH $-1/30/02$

BORING NO. 5D=MW-08 DATE $\frac{8/27/07}{\ }$ sheet 4 of 7

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-1/23/02$ BORING FINISH $-1/30/02$

BORING NO. 5D=MW-08 DATE 28/27/07 SHEET 5 OF 7

and the state

EPRI_A AEP

JOB NUMBER

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-1/23/02$ BORING FINISH $-1/30/02$

BORING NO. D=MW-08 DATE $\frac{8/27/07}{\ }$ sheet 6 of 7

 $\frac{1}{2}$

EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP

LOG OF BORING AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

EPRI GROUND WATER STUDY - AMOS BORING START PROJECT F**EPRI GROUND WATER STUDY - AMOS** TERRING START 1/23/02

DATE **D=MW-08** OF COMPANY **7** BORING FINISH 1/30/02 BORING NO. **D=MW-08** DATE <mark>8/27/07 SHEET 7 OF 7</mark>

AMERICAN ELECTRIC POWER SERVICE CORPORATION AEP CIVIL ENGINEERING LABORATORY LOG OF BORING

JOB NUMBER

COMPANY

COORDINATES **N 533,589.2 E 1,726,988.1** PROJECT FEPRI GROUND WATER STUDY - AMOS TERRING START 1/15/02

JOB NUMBER

COMPANY

AEP

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-1/15/02$ BORING FINISH $-1/16/02$

6 8/27/07 D=MW-09 2 OF DATE BORING NO. SHEET

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-1/15/02$ BORING FINISH $-1/16/02$ **BORING NO. D=MW-09** DATE $\frac{8}{27/07}$ SHEET 3 OF 6

JOB NUMBER

COMPANY

EPRI GROUND WATER STUDY - AMOS PROJECT LEPRI GROUND WATER STUDY - AMOS TERRING START 21/15/02 TERRING FINISH

8/27/07 SHEET DATE BORING START **D=MW-09** DATE $\frac{8/27/07}{\ }$ sheet 4 of BORING NO. **1/16/02**

Continued Next Page

6

AEF 6

JOB NUMBER COMPANY

 $\overline{}$

EPRI AMOS.GPJ AEP.GDT 8/27/07 AEP

JOB NUMBER

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-1/15/02$ BORING FINISH $-1/16/02$

DATE **D=MW-09** OF **6 6** BORING NO. **8/27/07** SHEET

COMPANY

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

COMPANY

COORDINATES **N 534,085.8 E 1,724,114.6** PIEZOMETER TYPE PROJECT FEPRI GROUND WATER STUDY - AMOS TERRING START 1/17/02

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-1/17/02$ BORING FINISH $-1/22/02$

BORING NO. COMPANY **8/27/07** OF **D=MW-10 2** DATE **7** SHEET

JOB NUMBER

COMPANY

PROJECT LEPRI GROUND WATER STUDY - AMOS A BORING START $-1/17/02$ BORING FINISH $-1/22/02$

D=MW-10 DATE **3 7** OF BORING NO. **8/27/07** SHEET

JOB NUMBER

EPRI GROUND WATER STUDY - AMOS PROJECT LEPRI GROUND WATER STUDY - AMOS TERRING START 21/17/02

DATE **8/27/07** SHEET **4** OF 7 **D=MW-10** OF COMPANY BORING NO. **D=MW-10** DATE **8/27/07** BORING FINISH **1/22/02**

JOB NUMBER

EPRI GROUND WATER STUDY - AMOS PROJECT LEPRI GROUND WATER STUDY - AMOS TERRING START 21/17/02

DATE **8/27/07** SHEET 5 OF 7 **D=MW-10** OF COMPANY BORING NO. **D=MW-10** DATE **8/27/07** BORING FINISH **1/22/02**

EPRI AMOS.GPJ AEP.GDT 8/27/07 AEP EPRI_AMOS.GPJ AEP.GDT 8/27/07 AEP

JOB NUMBER

EPRI GROUND WATER STUDY - AMOS PROJECT LEPRI GROUND WATER STUDY - AMOS TERRING START 21/17/02 TERRING FINISH

DATE **8/27/07** SHEET **6** OF 7 BORING START **D=MW-10 6** OF COMPANY BORING NO. **1/22/02**

JOB NUMBER

COMPANY

PROJECT FEPRI GROUND WATER STUDY - AMOS TERRING START 1/17/02

Electric Power Research Institute, 1999

Well Construction Diagrams

MW-1 to MW-10

Stantec Consulting Services Inc., 2012

Well Construction Diagrams

STN-12-4, STN-12-8, STN-12-9

LOCATION:

Northing: 532,150.52 Easting: 1,728,713.76 Ground Elevation: 875.30' Installation Date: 2/21/12 Horizontal Datum: NAD83 WV. South Vertical Datum: NAVD 88

PIEZOMETER DETAIL AEP AMOS POWER PLANT, FLY ASH DAM COMPLEX STN-12-9, WEST VIRGINIA WELL ID WV00054-0001-12

LOCATION:

Northing: 532, 214.20 Easting: 1,728,169.25 Ground Elevation: 872.66' Installation Date: 2/24/12 Horizontal Datum: NAD83 WV. South Vertical Datum: NAVD 88

PIEZOMETER DETAIL AEP AMOS POWER PLANT, FLY ASH DAM COMPLEX STN-12-8, WEST VIRGINIA WELL ID WV00054-0002-12

Northing: 531,882.29 Easting: 1,726,127.18 Ground Elevation: 861.83' Installation Date: 3/8/12 Horizontal Datum: NAD 83 WV. South Vertical Datum: NAVD 88

PIEZOMETER DETAIL AEP AMOS POWER PLANT, FLY ASH DAM COMPLEX STN-12-4, WEST VIRGINIA WELL ID WV00054-0003-12

American Electric Power, 1975- 1984

Piezometer Construction Information

PP2, PP3, PP4R, PP7R, PP8F, PP8RA, P8400, P8401

H.C. Nutting Company, 2008

Boring Logs

2008-1 to 2008-17

l,

 $\hat{\boldsymbol{\cdot}$

 $\overline{}$

 $\hat{\boldsymbol{\beta}}$

 $\frac{1}{2}$

医单位重量 医半角体 医无子宫的

 $\hat{\mathcal{L}}$

 $\begin{array}{c} \downarrow \\ \downarrow \\ \downarrow \end{array}$

 $\frac{1}{2}$

 $\begin{array}{c} 1 \\ 1 \\ 1 \\ 1 \end{array}$

 $\hat{\mathcal{L}}$

 $\begin{matrix} \mid \\ \mid \\ \mid \\ \mid \end{matrix}$

 $\bar{\bar{z}}$

 $\hat{\boldsymbol{\theta}}$

 $\begin{array}{c} 1 \\ 1 \\ 2 \end{array}$

 $\begin{array}{c} 1 \\ 1 \\ 1 \end{array}$

 $\hat{\boldsymbol{\beta}}$

 $\begin{array}{c} \frac{1}{2} \\ \frac{1}{2} \end{array}$

 $\frac{1}{\sqrt{2}}$

l,

 $\begin{array}{c} 1 \\ 1 \\ 2 \\ 3 \\ 4 \end{array}$

 $\frac{1}{2}$

 $\frac{1}{2}$

 $\hat{\mathcal{L}}$

J.

 $\frac{1}{2}$

 $\hat{\boldsymbol{\beta}}$

 $\begin{array}{c} \pm \sqrt{2} \\ \pm \sqrt{2} \end{array}$

 $\frac{1}{2}$

 $\ddot{}$

 $\hat{\boldsymbol{\beta}}$

ł,

 $\frac{1}{2}$ $\frac{1}{\sqrt{2}}$

 $\ddot{}$

 $\frac{1}{2}$

 $\bar{\bar{z}}$

 $\ddot{}$

 $\begin{array}{c} \bullet \bullet \\ \bullet \bullet \\ \bullet \end{array}$ $\frac{1}{2}$

 $\frac{1}{2}$

 $\frac{1}{2}$

 $\begin{array}{ccc} & \ast & & \\ \end{array}$

American Electric Power, 2008

Boring Logs

2008-19 to 2008-28

AMERICAN ELECTRIC POWER SERVICE CORPORATION AEP CIVIL ENGINEERING LABORATORY LOG OF BORING

JOB NUMBER

COMPANY

PROJECT Lamos FGD Haul Road **Born Born BORING START** 26/11/08

COORDINATES **N 533,257.1 E 1,727,206.5** PIEZOMETER TYPE

LOG OF BORING AMERICAN ELECTRIC POWER SERVICE CORPORATION AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

COMPANY

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

COMPANY

PROJECT Lamos FGD Haul Road **Born Born BORING START** 2/10/08

COORDINATES **N 533,997.2 E 1,727,462.1** PIEZOMETER TYPE

LOG OF BORING AMERICAN ELECTRIC POWER SERVICE CORPORATION AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

COMPANY

AEP

BORING NO. 2008-21 DATE 5/13/08 SHEET 2 OF 2 Amos FGD Haul Road BORING START PROJECT **3/10/08** BORING FINISH **3/11/08**

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

COMPANY

PROJECT Lamos FGD Haul Road **Born Born BORING START** 26/12/08

COORDINATES **N 534,941.6 E 1,728,009.5**

LOG OF BORING AMERICAN ELECTRIC POWER SERVICE CORPORATION AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

COMPANY

PROJECT LATT Annes **FGD Haul Road Matter Contract Annual Start Ann and Start Annual Start Annual Start Ann and S 2008-22 DATE 5/13/08 SHEET 2 OF 3**

Continued Next Page

AEP

AEP CIVIL ENGINEERING LABORATORY LOG OF BORING AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

COMPANY

PROJECT **Amos FGD Haul Road**

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

COMPANY

PROJECT Lamos FGD Haul Road **Born Born BORING START** 26/18/08

COORDINATES **N 535,340.2 E 1,728,037.6 NA**

AEP CIVIL ENGINEERING LABORATORY LOG OF BORING AMERICAN ELECTRIC POWER SERVICE CORPORATION

 $\overline{}$

JOB NUMBER

COMPANY

3 OF

AEP CIVIL ENGINEERING LABORATORY LOG OF BORING AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

COMPANY

AEP

PROJECT Lamos FGD Haul Road **Boring Start Medicine Start 1999** BORING START 23/18/08

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

COMPANY

PROJECT Lamos FGD Haul Road **Born Born BORING START** 26/18/08

COORDINATES **N 535,663.5 E 1,728,199.2**

AEP CIVIL ENGINEERING LABORATORY LOG OF BORING AMERICAN ELECTRIC POWER SERVICE CORPORATION

 $\overline{}$

JOB NUMBER

COMPANY

Amos FGD Haul Road PROJECT **3/18/08**

AEP CIVIL ENGINEERING LABORATORY LOG OF BORING AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER **NAME | MARIO CONTROL**

COMPANY

Amos FGD Haul Road PROJECT **3/18/08**

LOG OF BORING AMERICAN ELECTRIC POWER SERVICE CORPORATION AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

COMPANY

PROJECT LATT Annes **FGD Haul Road Manual Annual Accord Boring Start 2018/08** BORING FINISH 2018/08 **2008-25** DATE **5/13/08** SHEET **4** OF **4**

AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING AEP CIVIL ENGINEERING LABORATORY

JOB NUMBER

COMPANY

PROJECT Lamos FGD Haul Road **Born Born BORING START** 23/24/08

COORDINATES **N 535,666.0 E 1,728,598.9**

AEP CIVIL ENGINEERING LABORATORY LOG OF BORING AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER __________________________________

COMPANY

AEP AMOS FGD HAUL ROAD.GPJ AEP.GDT 5/13/08

PROJECT LATT Annes **FGD Haul Road Manual Line Contract Contract Start Annual Start Annual Start Annual Start Annu BORING NO. 2008-26 DATE 5/13/08 SHEET 2 OF 5**

AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION LOG OF BORING

JOB NUMBER **NAME | MARIO CONTROL**

COMPANY

BORING NO. 2008-26 DATE 5/13/08 SHEET 3 OF 5 PROJECT LATTOS FGD Haul Road **Bornary Communist Control Control Control of the State of State Control Control Control of the State of State Control Co**

AEP AMOS FGD HAUL ROAD.GPJ AEP.GDT 5/13/08 AEP AMOS FGD HAUL ROAD.GPJ AEP.GDT 5/13/08

JOB NUMBER

PROJECT Lamos FGD Haul Road **Annual Communist Commun**

BORING NO. **2008-26** DATE **5/13/08** SHEET 1 OF 5 COMPANY **2008-26 5/13/08 4** SHEET

AEP AMOS FGD HAUL ROAD.GPJ AEP.GDT 5/13/08 AEP AMOS FGD HAUL ROAD.GPJ AEP.GDT 5/13/08

LOG OF BORING AEP CIVIL ENGINEERING LABORATORY AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

COMPANY

JOB NUMBER

COMPANY

PROJECT Lamos FGD Haul Road **Born Born BORING START** 23/25/08

N 535,863.0 E 1,728,908.9 PIEZOMETER TYPE **NA** COORDINATES

AEP CIVIL ENGINEERING LABORATORY LOG OF BORING AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

Amos FGD Haul Road PROJECT Lamos FGD Haul Road **being the Soutier Control of the Southern Single Start**

BORING START **5/13/08** SHEET **6 2008-28 2** OF COMPANY BORING NO. 2008-28 DATE BORING FINISH **3/26/08**

AMERICAN ELECTRIC POWER SERVICE CORPORATION AEP CIVIL ENGINEERING LABORATORY LOG OF BORING <u> 1989 - Johann Barbara, martxa a</u>

JOB NUMBER

COMPANY

8

73.9

NQ

63.9

9

9.9

79

65

70

6

AMOS FGD HAUL ROAD.GPJ AEP.GDT 5/13/08 AEP AMOS FGD HAUL ROAD.GPJ AEP.GDT 5/13/08 AEP,

Continued Next Page

HARD N5 MEDIUM GRAY WELL CEMENTED

w/trace of fine grain sandstone; high angle fracture @ 64.2'; soft area 68.2' - 68.8'

SILTY CLAYSHALE

5/13/08

AEP CIVIL ENGINEERING LABORATORY LOG OF BORING AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

COMPANY

Amos FGD Haul Road PROJECT **3/25/08**

AEP CIVIL ENGINEERING LABORATORY LOG OF BORING AMERICAN ELECTRIC POWER SERVICE CORPORATION

JOB NUMBER

PROJECT **Amos FGD Haul Road 3/25/08**

2008-28 DATE BORING START **5 6** OF COMPANY SHEET BORING FINISH **3/26/08** BORING NO. **5/13/08**

AEP AMOS FGD HAUL ROAD.GPJ AEP.GDT 5/13/08 AEP AMOS FGD HAUL ROAD.GPJ AEP.GDT 5/13/08

JOB NUMBER

COMPANY

ĄEP

PROJECT Lamos FGD Haul Road **Boring Start Medicine Start 3/25/08**

2008-28 DATE **5/13/08** SHEET **6** OF **6** BORING START 3/25/08 BORING FINISH 3/26/08

SAMPLE STANDARD TOTAL
LENGTH
RECOVERY
RECOVERY
SAR DEPTH GRAPHIC SAMPLE SAMPLE NUMBER U S C S DEPTH PENETRATION SOIL / ROCK WELL DRILLER'S $\frac{1}{2}$ IN RESISTANCE IN FEET $|$ RESISTANCE $\left[\begin{smallmatrix} 2 & 0 \\ 0 & 0 \end{smallmatrix}\right]$ % IDENTIFICATION NOTES FEET FROM BLOWS / 6" TO STOPPED BORING @ 123.9'; TREMIE GROUTED FROM 123.9' TO GRADE; USED ~50 GALS; TOPPED BOREHOLE W/50 LBS OF QUICKCRETE AMOS FGD HAUL ROAD.GPJ AEP.GDT 5/13/08 AEP AMOS FGD HAUL ROAD.GPJ AEP.GDT 5/13/08

Arcadis, 2017-2018

Boring Logs and Well Construction Diagrams

MW-1801A/B/C to MW-1810A

WV015976.0005 JOB NUMBER

PROJECT **Amos Fly Ash Pond**

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the second of the Soring No. <u>MW-1801A the DATE 1/11/19 the Sheet and Soria</u> PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the second of the Soring No. <u>MW-1801A the DATE 1/11/19 the Sheet (Anti-Of the Antende Sheet Antend</u> PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

Water Level, ft $\quad \searrow$ **221.5** $\qquad \searrow$ DATE **7/18/2018** GROUND ELEVATION SYSTEM **901.1 NAD83/NAVD88 2.8** COORDINATES N 531,401.1 E 1,726,317.0 **No. 11 BELL PERTYPE NARES AND A LIMIT AND MELL TYPE N WV015976.0005** JOB NUMBER PROJECT **Amos Fly Ash Pond**

TIME

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latter Mathematic Company of the company of the set of the s PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

ÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mate of the Section Power (Section Section Computed No. No. 2018) DATE 1/11/19 SHEET LATTER OF SHEET SECTION OF SHEET SECTION And SECTION And SECTION SECTION And SECTION AND SHEET SECTION AND SHEET SECTION A PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

ÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mathematic Company of the company of the set of the s PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

₽

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mathematic Company of the company of the company of the company $\frac{1}{11}$ of the company $\frac{9}{100}$ PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mathematic Company of the company of the set of the s PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** DODINIC DESKTOPIEOP NICOLE פט וואר החפ **ASINS** 1/11/19 13:55 AFP GDT 心
化

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mathematic Company of the company of the company of the company $\frac{1}{11}$ of the company $\frac{9}{100}$ PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ心
华

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

BORING NO. <mark>MW-1801B</mark>___DATE_1/11/19____SHEET __9____OF ____9___________________ Amos Fly Ash Pond COMPANY _**American Electric Power** BORING NO. <mark>MW-1801B </mark> DATE <u>1/11/19 </u> SHEET _ **9** OF ___ **9 American Electric Power**

DATE_**1/11/19** SHEET **12/21/17 12/18/17** BORING FINISH 22/21/17

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ₽

COORDINATES **N 531,413.0 E 1,726,329.1** COMPANY _**American Electric Power BORING NO. <u>MW-1801C </u> DATE_<u>1/11/19 </u> SHEET _1___OF ___13___ WV015976.0005** JOB NUMBER PROJECT **Amos Fly Ash Pond COMPANY** American Electric Power

GROUND ELEVATION HGT. RISER ABOVE GROUND SYSTEM DIA **900.4 NAD83/NAVD88 2.8 2" N 531,413.0 E 1,726,329.1** PIEZOMETER TYPE **NA** WELL TYPE OW **NARCH POWELL TYPE OW** DEPTH TO TOP OF WELL SCREEN **237** BOTTOM **262** WELL DEVELOPMENT BACKFILL **Surge/Purge Bentonite Grout** FIELD PARTY **Zachary Racer (AEP)** RIG **Direct Circulation - Wireline Core 12/21/17 12/18/17** BORING FINISH 22/21/17

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the section of the SHORING NO. NW-1801C Lattrice DATE 1/11/19 SHEET 2 OF 13 PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** OINIC DECKTODIEOD NICOLE ספון ווארחרים C-N ICE 1/11/19 13:55 AFP GDT 心
化

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Lattric Antence Company of the Company of the Company of the Sheet of the Company of the Company of the C PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antence Company of the Company of the Section of the SHEET And SHEET And SHEET And SHEET And SH PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

DOC OINIT

OINIC

NINO I

DECKTODEOD

פט וואר החפ

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the second of the Soring No. <u>MW-1801C the DATE 1/11/19 the Sheet the Sori</u> PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

ÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antence Company of the Com PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the section of the Section of the SHEET Decembent of the SHEET $\overline{12}$ of the $\overline{13}$ the settembent of the section of PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** DODINIC DESKTOPIEOP NICOLE פט וואר החפ C-N ICE 1/11/19 13:55 AFP GDT 心
化

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the section of the SHORING NO. NW-1801C Lattrice DATE 1/11/19 SHEET 2 OF 13 PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

PROJECT **Amos Fly Ash Pond**

COMPANY Lattric Antentic Lattric Power the section of the SHORING NO. NW-1801C Lattrice DATE 1/11/19 SHEET 2 OF 13 **12/21/17 12/18/17** BORING FINISH 22/21/17

AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJAEP-.

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the second of t PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** OINIC DECIVEOREOR MICOLE פט וואר החפ C-N ICE 1/11/19 13:55 AFP GDT 心
化

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

PROJECT **Amos Fly Ash Pond**

COMPANY _**American Electric Power BORING NO. <u>MW-1801C </u> DATE_<u>1/11/19 </u> SHEET_<u>11</u> OF ___<u>13</u> _ 12/21/17 12/18/17** BORING FINISH 22/21/17

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** DODINIC DESKTOPIEOP NICOLE פט וואר החפ **ASINS** 1/11/19 13:55 AFP GDT 心
化

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1801C </u> DATE_<u>1/11/19 </u> SHEET_<u>12</u> OF __13__** PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

 \tilde{c} Ē TINIT č

DOM NAM

č

خ
پ

COMPANY Lattric Antence Company of the Company of the Boring No. 2010, 2010, 2016 Lattrich DATE 1/11/19 SHEET 20 OF 2020 Lattrich DATE 10 Antence Company of the C PROJECT LAmos Fly Ash Pond **12/21/17 Communist Commu**

COMPANY _**American Electric Power BORING NO. <u>MW-1802A </u> DATE_<u>1/11/19 </u> SHEET _1__ OF ___ <u>3</u> __**

DATE_**1/11/19** SHEET

RECORDER M. McCann

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

NA SW CASING **NA** AIR HAMMER

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

6" 8"

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the second of the se PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

₽

Continued Next Page

WV015976.0005 JOB NUMBER

PROJECT

Amos Fly Ash Pond American Electric Power

DATE_**1/11/19** SHEET BORING START BORING FINISH **12/6/17 12/8/17** BORING NO. <mark>MW-1802A </mark> DATE_**1/11/19** SHEET __**3**___ OF ____**3**___ **MW-1802A** COMPANY _**American Electric Power** BORING NO. <mark>MW-1802A </mark> DATE <u>1/11/19 </u> SHEET __3 OF ____3___

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJă بہ ¥, $1/11/10$ AFP GDT 心
化

NA | HW CASING ADVAI

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

NA NW CASING **NA** SW CASING **NA** AIR HAMMER

 $\overline{3"}$ 6" 8"

HW CASING ADVANCER

WV015976.0005 JOB NUMBER

 $\frac{4}{2}$ well type: OW = OPEN TUBE SLOTTED SCREEN, GM = GEOMON \qquad

RECORDER M. McCann

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** DODINIC DESKTOPIEOP NICOLE פט וואר החפ **ASINS** 1/11/19 13:55 AFP GDT 心
化

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the Company of the Company of the Sheet of the Sheet of the Sheet of the S PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

₽

WV015976.0005 JOB NUMBER

LOG OF BORING

American Electric Power

PROJECT **Amos Fly Ash Pond**

COMPANY Latterican Electric Power the section of the sect BORING START BORING FINISH **12/6/17 12/8/17**

 117 55 118 120 92 120 88 75.7 65.7 85.7 75.7 95.7 85.7 105.7 RC 95.7 7 | RC | 65.7 | 75.7 | 8 | RC | 75.7 | 85.7 | 9 | RC | 85.7 | 95.7 | 55 | | | 57 92 | | 88 | | 10 RC 95.7 SHALE; weak to very strong field strength; GLEY 10R 3/2, massive; slight to moderate decomposition; competent to slightly disintegrated; slightly fractured at bed plane joints. SANDSTONE; very strong field strength; $\mathsf{SO}[\mathbb{C}[\mathbb{$ decomposition; slightly to moderate disintegration; slightly fractured. Note: Mechanical fractures and 80', possible natural fractures at 82.1', horizontal fracture at 85'. No mineralization at fractures, fractures are natural to smooth. SANDSTONE; very strong field strength; GLEY1 3/N to GLEY1 5/N; fine to medium grained; massive with thin laminations; fresh to slight decomposition; moderate disintegration; $\mathsf{90} \dashv$ \Box \Box slightly to moderately fractured. Note: Possible natural fractures (joints, horizontal) at 87.0', 88.7', 89.8', 90.2', 91.3', 92.7'. Very narrow to narrow other mechanical/bed plane no mineralization joints and possible natural fractures (joint) at 96.4' (10 degree, very narrow, smooth to rough), 97.5' (15 degree), 98.8' (horizontal joint), 99.5' (40 degree), 105' (25 degree, smooth to very narrow), 102.5' (horizontal joint), 103' (healed $95 - \begin{bmatrix} \dots \\ \dots \end{bmatrix}$ vertical joint/unconformity). RQD SAMPLE NUMBER SAMPLESTANDARD PENETRATION넍듰벡 I ... F RESISTANCE b츄워 % | ¨` | SAMPLE STANDARD $\frac{x}{10}$ RQD DEPTH $\frac{10}{10}$ or SOIL ROCK $\frac{11}{10}$ DRILLER'S

IN FEET RESISTANCE $\begin{bmatrix} 2 & 0 & 0 \\ 0 & 0 & 0 \\ 0 & 0 & 0 \\ 0 & 0 & 0 \end{bmatrix}$ SOIL ROCK $\begin{bmatrix} 1 & 0 & 0 \\ 0 & 1 & 0 \\ 0 & 0 & 0 \\ 0 & 0 & 0 \end{bmatrix}$ DRILLER' % DEPTH

IN
BOOT

FFFT
BOOTS IN 1G 이 인 이 시 FEET $|5^-|$ = SOIL / ROCK IDENTIFICATION DRILLER'S NOTES DEPTH IN FEET | RESISTANCE | 75 85 ⊣∷∷⊹ | I *Continued Next Page*

AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJAEP-

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the Company of the Company of the Sheet of the Sheet of the Sheet of the S PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

ÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY Latterican Electric Power the section of the sect COMPANY **American Electric Power**

PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

AEP - AEP. GDT - 1/11/19 13:55 - C.WSERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER. GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ₽

WV015976.0005 JOB NUMBER

PROJECT

American Electric Power

Amos Fly Ash Pond

DATE_**1/11/19** SHEET BORING START BORING FINISH **12/6/17 12/8/17** BORING NO. WW-1802B DATE 1/11/19 SHEET 8 OF 8 **8** OF COMPANY _**American Electric Power** BORING NO. <mark>MW-1802B </mark> DATE <u>1/11/19 </u> SHEET __8 OF ____8___

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ₽

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

COMPANY _**American Electric Power BORING NO. <u>MW-1802C </u> DATE_<u>1/11/19 </u> SHEET _1___OF ___13___**

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** OINIC DESKTOPIEOP NICOLE פט וואר החפ C-N ICE 1/11/19 13:55 AFP GDT 心
化

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJÆP

WV015976.0005 JOB NUMBER

 $E₀$ ã TIAIT o
C

אטוואנט

č

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

AEP-.

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ₽

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the section of the SHORING NO. NW-1802C Latter DATE 1/11/19 SHEET 2 OF 13 PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

 $E₀$ ã TINIT °

DON INC

č

COMPANY Lattric Antentic Lattric Power the section of the SHORING NO. MW-1802C LDATE 1/11/19 SHEET 2 OF 13 Los PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the section of the SHORING NO. NW-1802C Latter DATE 1/11/19 SHEET LO OF 13 PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

₽

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antence Company of the Company of the Magnetic Power of the SHEET SH PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

ESVAFP MOUNTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJã **DOC OINIT** OINIC e
C סמו וואר החס č Ę. $\frac{1}{2}$ $1/11/19$ AFP GDT ÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antence Company of the Company of the Magnetic Power of the SHEET SH PROJECT LAmos Fly Ash Pond **12/6/17 CORING START 22/6/17 CORING FINISH** 2018/17 2018 2019

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

Amos Fly Ash Pond American Electric Power

DATE_**1/11/19** SHEET BORING START BORING FINISH **12/6/17 12/8/17 BORING NO. <mark>MW-1802C</mark>____DATE_1/11/19_____SHEET__13___OF____13__________________** COMPANY _**American Electric Power** BORING NO. <mark>MW-1802C _</mark> DATE <u>1/11/19 </u> SHEET _13 OF ___13___

Water Level, ft $\quad \searrow \quad$ **196.9** $\qquad \searrow \quad$ \searrow DATE **7/18/2018** GROUND ELEVATION SYSTEM **904.3 NAD83/NAVD88 2.81** COORDINATES N 534,006.7 E 1,723,941.6 **No. 11 PIEZOMETER TYPE NA** WELL TYPE N **WV015976.0005** JOB NUMBER PROJECT **Amos Fly Ash Pond** COMPANY **8 American Electric Power**

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

TIME

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

₽

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latter Mate of the Muslim Borner of the Section of the Muslim Borner of the Section of the Section of the S PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJÆP

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

Continued Next Page

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

WV015976.0005 JOB NUMBER

 \tilde{c} Ē TINIT °

DOM NAM

č

خ
پ

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

WV015976.0005 JOB NUMBER

PROJECT **Amos Fly Ash Pond COMPANY** American Electric Power

COORDINATES N 534,010.6 E 1,723,944.6

GROUND ELEVATION HGT. RISER ABOVE GROUND SYSTEM DIA **904.0 NAD83/NAVD88 2.91 2"** PIEZOMETER TYPE **N 534,010.6 E 1,723,944.6 NA** WELL TYPE **OW** DEPTH TO TOP OF WELL SCREEN **253** BOTTOM **273.4** WELL DEVELOPMENT BACKFILL **Surge/Purge Bentonite Grout** FIELD PARTY **Zachary Racer (AEP)** RIG **Direct Circulation - Wireline Core** COMPANY _**American Electric Power BORING NO. <u>MW-1803C </u> DATE_<u>1/11/19 </u> SHEET _1__OF __14___** BORING START BORING FINISH **12/12/17 12/15/17**

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

ÆP

Continued Next Page

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJå
WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

Continued Next Page

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the section of the SHORING NO. NW-1803C LDATE 1/11/19 SHEET Table of the M PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

AFP MOUNTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ \tilde{c} ã TIAIT ° **DOM NO** č .
ان $1/11/19$ AFP GDT ÆP

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the section of the SHORING NO. NW-1803C Latter DATE 1/11/19 SHEET 2 OF 14 PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ₽

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the section of the SHORING NO. NW-1803C Latter 1/11/19 SHEET LO OF 14 Latter PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJÆP

Continued Next Page

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

ć

ć

ă بہ Å COMPANY _**American Electric Power BORING NO. <u>MW-1803C </u> DATE_<u>1/11/19 </u> SHEET_<u>11</u> OF __14__** PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1803C </u> DATE_<u>1/11/19 </u> SHEET_<u>12</u> OF __14 _** PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the section of the SHORING NO. NW-1803C Latter DATE 1/11/19 SHEET Latter SHORING NO. NET LATTER UP A SHEET LATTER SHEET LATTER AND THE SHORING NO. NET LATTER SHEET LATTER AND NET LATT PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ₽

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1803C </u> DATE_<u>1/11/19 </u> SHEET_<u>14</u> OF __14__** PROJECT LAmos Fly Ash Pond **12/14/2010 - In the START 12/12/17** - BORING FINISH 22/15/17

WV015976.0005 JOB NUMBER

PROJECT **Amos Fly Ash Pond**

AEP - AEP. GDT - 1/11/19 13:55 - C.WSERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER. GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **All Report Conduct And Amort Start** And Amore Start Land Boring Finish 5/23/18 The La

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ₽

WV015976.0005 JOB NUMBER

PROJECT

心
华

LOG OF BORING

American Electric Power

Amos Fly Ash Pond

DATE_**1/11/19** SHEET BORING START BORING FINISH **5/21/18 5/23/18** BORING NO. WW-1804A ___ DATE_1/11/19 ___ SHEET __3___ OF ____3___ **3** OF COMPANY _**American Electric Power** BORING NO. <mark>MW-1804A </mark> DATE <u>1/11/19 </u> SHEET __3 OF ____3___

WV015976.0005 JOB NUMBER

PROJECT **Amos Fly Ash Pond**

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the Company of the Company of the Sheet of the Sheet of the Sheet of the S PROJECT LAmos Fly Ash Pond **All Report Conduct And Amort Start** And Amore Start Land Boring Finish 5/23/18 The La

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** DODINIC DESKTOPIEOP NICOLE פט וואר החפ **ASINS** 1/11/19 13:55 AFP GDT 心
化

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **All Report Conduct And Amort Start** And Amore Start Land Boring Finish 5/23/18 The La

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ₽

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **All Report Conduct And Amort Start** And Amore Start Land Boring Finish 5/23/18 The La

心
华

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the Company of the Company of the Sheet of the Sheet of the Sheet of the S PROJECT LAmos Fly Ash Pond **All Report Conduct And Amort Start** And Amore Start Land Boring Finish 5/23/18 The La

AEP.GDT - 1/11/19 13:55 - C:USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJAEP-.

WV015976.0005 JOB NUMBER

LOG OF BORING

American Electric Power

PROJECT

Amos Fly Ash Pond

DATE_**1/11/19** SHEET BORING START BORING FINISH **5/21/18 5/23/18 BORING NO. <mark>MW-1804B</mark>___DATE_1/11/19____SHEET __6___**OF ____**8____** COMPANY _**American Electric Power** BORING NO. <mark>MW-1804B</mark>___ DATE_<mark>1/11/19___</mark>_ SHEET __6___OF ____8___

心
华

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY Latter Mate of the Company **American Electric Power**

PROJECT LAmos Fly Ash Pond **All Report Conduct And Amort Start** And Amore Start Land Boring Finish 5/23/18 The La

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** DODINIC DESKTOPIEOP NICOLE פט וואר החפ **ASINS** 1/11/19 13:55 AFP GDT 心
化

WV015976.0005 JOB NUMBER

ã TINIT °

DOM NO

č

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **All Report Conduct And Amort Start** And Amore Start Land Boring Finish 5/23/18 The La

COMPANY Latter Mathematic Company of the company of the company of the company $\frac{1}{11}$ of the company $\frac{9}{11}$

0 0-192': Riser CL 0-3': No recovery - Silty CLAY overburden. 75.5 60 100 $120 | 100 |$ [::: 3.0 0.0 RC 3.0 3.3 2 14.3 RC 9.3 24.3 14.3 $\overline{0.0}$ $\overline{14.3}$ 100 0 NR 1 RC 3.0 2 RC 9.3 3 RC ML 3-6.9': SANDSTONE; very strong field strength; GLEY 1 4/5GY (Greenish Gray); very fine-grained texture; thinly bedded; moderately decomposed; competent; all mechanical $5 \rightarrow$:::: | breaks. 6.9-9,5': Sandy SHALE; moderate field strength; GLEY 1 4/5GY (Greenish Gray) with red mottling; very fine-grained texture; thinly bedded; slightly decomposed; moderately disintegrated; all mechanical breaks. 9.5-15.1': SANDSTONE; very strong field strength; GLEY 1 6/N (Gray); very fine-grained 10 texture; thinly bedded; fresh; competent; all mechanical breaks. 15.1.1.1.1.1.1.1.
15.1-32': SANDSTONE; strong field strength; 10 YR 5/2 (Grayish Brown); fine to medium-grained texture, grading; thinly bedded; slightly decomposed; slightly disintegrated; all mechanical breaks. Water Level, ft TIME DATE **7/18/2018** GROUND ELEVATION 883.3 $\frac{4}{2}$ well type: OW = OPEN TUBE SLOTTED SCREEN, GM = GEOMON \qquad P IEZOMETER TYPE: $PT = O$ PEN TUBE POROUS TIP, SS = OPEN TUBE $|$ **N 533,272.3 E 1,727,730.1** PIEZOMETER TYPE **NA** WELL TYPE OW **NARCH POW 883.3** SYSTEM **NAD83/NAVD88** HGT. RISER ABOVE GROUND_**2.34** DIA 2" DEPTH TO TOP OF WELL SCREEN **192** BOTTOM **212** WELL DEVELOPMENT BACKFILL **Surge/Purge Bentonite Grout** FIELD PARTY **Zachary Racer (AEP) X** NQ-2 ROCK CORE **NA** 6" x 3.25 HSA **NA** 9" x 6.25 HSA **NA** HW CASING ADVANCER **NA** NW CASING **TYPE OF CASING USED A. Gillsepie**
 A. Gillsepie
 A. Gillsepie
 A. Gillsepie
 A. Gillsepie
 A. Gillsepie *Continued Next Page* SLOTTED SCREEN, G = GEONOR, P = PNEUMATIC DIA **2"** RIG **Direct Circulation -** $\boxed{\vee}$ 211.8 $\boxed{\mathbf{Y}}$ $\boxed{\mathbf{Y}}$ COORDINATES N 533,272.3 E 1,727,730.1 $\overline{3}$ " **Wireline Core** H SAMPLE STANDARD FEROD DEPTH U 6

A B DEPTH PENETRATION TO B N T 9 0

SAMPLE PENETRATION TO B N T 9 0

SAMPLE RESISTANCE DEON % FFFT 8 9 9 DEPTH PENETRATIONIT H ... F IN FEET | RESISTANCE [oɪ̯z̯Զ] % | ¨` | IN FEET RESISTANCE **DEC**
FROM TO BLOWS / 6" $\%$ $\begin{bmatrix} 1N & \frac{15}{6} & \frac{5}{6} \\ -\frac{1}{6} & \frac{1}{6} & \frac{1}{6} \end{bmatrix}$ DEPTH $|Q|_{\infty}$ FEET $|5^-|$ = SOIL / ROCK $\begin{array}{c} | \ \bot \\ \text{SOLUTION} \end{array}$ IDENTIFICATION DRILLER'S NOTES TO BLOWS *T*O BLOWS *T*O BEPTH **EXAMPLE ASSESS TANDARD**

TO BLOWS *I*^C TO BL $SAMPLE \left[\begin{array}{c} \text{STANDARD} \\ \text{ST} \end{array} \right] \begin{array}{c} \text{S} \\ \text{T} \end{array}$ BORING START BORING FINISH **1/9/18 1/18/18** PROJECT **Amos Fly Ash Pond**

RECORDER A. Gillsepie

.1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

AEP.GDT

نو
پو

NA SW CASING **NA** AIR HAMMER

WV015976.0005 JOB NUMBER

COMPANY American Electric Power

 $\frac{6}{8}$

8"

WV015976.0005 JOB NUMBER

Amos Fly Ash Pond PROJECT **American Electric Power**

DATE_**1/11/19** SHEET BORING START BORING FINISH **1/9/18 1/18/18** BORING NO. **1/11/19** SHEET **2** OF **MW-1805B** COMPANY _**American Electric Power** BORING NO. <mark>MW-1805B </mark> DATE <u>**1/11/19** SHEET _2 </u>_OF ___ **9** _

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJED MOUNITAINEED ă Å $1/11/10$ þ AFP ₽

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mathematic Company of the company of the set of the s PROJECT LAmos Fly Ash Pond **Amos Fly Ash Pond Reserve Conduct And Amos Conducts And Amos Boring Fly Ash Pond Reserve And Boring Start Left And Boring Fly Ash Pond Reserve And Boring Start Left And Amos Boring Products And**

AEP - AEP.GDT - 1/11/19 13:55 - C:WSERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

Continued Next Page

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

Amos Fly Ash Pond American Electric Power

DATE_**1/11/19** SHEET **BORING NO. <mark>MW-1805B</mark>___DATE_1/11/19____SHEET__4___OF____9______________________** COMPANY _**American Electric Power** BORING NO. <mark>MW-1805B </mark> DATE <u>**1/11/19** </u>SHEET _4 OF ___ **9**

BORING START BORING FINISH **1/9/18 1/18/18**

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ心
华

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY Latter Mate of the Company of the Company of the Company of the Sheet of the Sheet of the Sheet of the S COMPANY **American Electric Power**

BORING START BORING FINISH **1/9/18 1/18/18**

 $120 -$

Continued Next Page

PROJECT **Amos Fly Ash Pond**

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY Latter Mathematic Company of the c COMPANY **American Electric Power**

PROJECT LAmos Fly Ash Pond **Amos Fly Ash Pond Reserve Conduct And Amos Conducts And Amos Boring Fly Ash Pond Reserve And Boring Start Left And Boring Fly Ash Pond Reserve And Boring Start Left And Amos Boring Products And**

Continued Next Page

AEP - AEP.ODT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.OPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the Company of the Company of the Sheet of the Sheet of the Sheet of the S PROJECT LAmos Fly Ash Pond **Amos Fly Ash Pond Reserve Conduct And Amos Conducts And Amos Boring Fly Ash Pond Reserve And Boring Start Left And Boring Fly Ash Pond Reserve And Boring Start Left And Amos Boring Products And**

Continued Next Page

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

American Electric Power

Amos Fly Ash Pond

DATE_**1/11/19** SHEET BORING START BORING FINISH **1/9/18 1/18/18 BORING NO. <mark>MW-1805B</mark>___DATE_1/11/19____SHEET __8___OF ____9____________________** COMPANY _**American Electric Power** BORING NO. <mark>MW-1805B </mark> DATE <u>**1/11/19** </u>SHEET _8 OF ___ **9**

Continued Next Page

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

COMPANY _**American Electric Power** BORING NO. <mark>MW-1805B </mark> DATE <u>**1/11/19** </u>SHEET _9 OF ___9___ **American Electric Power**

Amos Fly Ash Pond

BORING START BORING FINISH **1/9/18 1/18/18** BORING NO. 2000-1805-100 MM DATE 19 MATE 19 MM DATE 19 MM SHEET SAMING NO. 2014

DATE_**1/11/19** SHEET

9 OF

COMPANY Lattric Antence Company of the Company of the MCANG MO. And the MCANG MO. And the Date of the MCANG MC

0 0-232': Riser CL 0-3': No recovery - Silty CLAY overburden. 75.5 60 100 $120 | 100 |$ [::: 3.0 0.0 RC 3.0 3.3 2 14.3 RC 9.3 24.3 14.3 $\overline{0.0}$ $\overline{14.3}$ 100 0 NR 1 RC 3.0 2 RC 9.3 3 RC ML 3-6.9': SANDSTONE; very strong field strength; GLEY 1 4/5GY (Greenish Gray); very fine-grained texture; thinly bedded; moderately decomposed; competent; all mechanical $5 \rightarrow$:::: | breaks. 6.9-9,5': Sandy SHALE; moderate field strength; GLEY 1 4/5GY (Greenish Gray) with red mottling; very fine-grained texture; thinly bedded; slightly decomposed; moderately disintegrated; all mechanical breaks. 9.5-15.1': SANDSTONE; very strong field strength; GLEY 1 6/N (Gray); very fine-grained 10 texture; thinly bedded; fresh; competent; all mechanical breaks. 15.1.1.1.1.1.1.1.
15.1-32': SANDSTONE; strong field strength; 10 YR 5/2 (Grayish Brown); fine to medium-grained texture, grading; thinly bedded; slightly decomposed; slightly disintegrated; all mechanical breaks. Water Level, ft TIME DATE **7/18/2018** GROUND ELEVATION 882.3 $\frac{4}{2}$ well type: OW = OPEN TUBE SLOTTED SCREEN, GM = GEOMON \qquad P IEZOMETER TYPE: $PT = O$ PEN TUBE POROUS TIP, SS = OPEN TUBE $|$ **N 533,273.9 E 1,727,725.7** PIEZOMETER TYPE **NA** WELL TYPE OW **NARCH STATE 882.3** SYSTEM **NAD83/NAVD88** HGT. RISER ABOVE GROUND_**3.59** DIA 2" DEPTH TO TOP OF WELL SCREEN **232** BOTTOM **262** WELL DEVELOPMENT BACKFILL **Surge/Purge Bentonite Grout** FIELD PARTY **Zachary Racer (AEP) X** NQ-2 ROCK CORE **NA** 6" x 3.25 HSA **NA** 9" x 6.25 HSA **NA** HW CASING ADVANCER **NA** NW CASING **TYPE OF CASING USED A. Gillsepie**
 A. Gillsepie
 A. Gillsepie
 A. Gillsepie
 A. Gillsepie
 A. Gillsepie *Continued Next Page* SLOTTED SCREEN, G = GEONOR, P = PNEUMATIC DIA **2"** RIG **Direct Circulation -** $\sqrt{2}$ 262.5 $\sqrt{2}$ $\sqrt{2}$ COORDINATES N 533,273.9 E 1,727,725.7 $\overline{3}$ " $\frac{6}{8}$ **Wireline Core** H SAMPLE STANDARD FEROD DEPTH U 6

A B DEPTH PENETRATION TO B N T 9 0

SAMPLE PENETRATION TO B N T 9 0

SAMPLE RESISTANCE DEON % FFFT 8 9 9 DEPTH PENETRATIONIT H ... F IN FEET | RESISTANCE [oɪ̯z̯Զ] % | ¨` | IN FEET RESISTANCE **DEC**
FROM TO BLOWS / 6" $\%$ $\begin{bmatrix} 1N & \frac{15}{6} & \frac{5}{6} \\ -\frac{1}{6} & \frac{1}{6} & \frac{1}{6} \end{bmatrix}$ DEPTH $|Q|_{\infty}$ FEET $|5^-|$ = SOIL / ROCK $\begin{array}{c} | \ \bot \\ \text{SOLUTION} \end{array}$ IDENTIFICATION DRILLER'S NOTES TO BLOWS *T*O BLOWS *T*O BEPTH **EXAMPLE ASSESS TANDARD**

TO BLOWS *I*^C TO BLOWS *I*^C TO BLOWS *I*^C TO BLOWS *COO* FEET **I**^C TO BLOWS *I*^C TO BLOWS $SAMPLE \left[\begin{array}{c} \text{STANDARD} \\ \text{ST} \end{array} \right] \begin{array}{c} \text{S} \\ \text{T} \end{array}$ BORING START BORING FINISH **1/9/18 1/18/18** PROJECT **Amos Fly Ash Pond**

RECORDER A. Gillsepie

.1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJAEP.GDT نو
پو

NA SW CASING **NA** AIR HAMMER

WV015976.0005 JOB NUMBER

COMPANY American Electric Power

8"

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the section of the Section of the SHEET 2 of 13 the section of the SHEET 2 of 13 PROJECT LAmos Fly Ash Pond **Amos Fly Ash Pond Reserve Conduct And Amos Conducts And Amos Boring Fly Ash Pond Reserve And Boring Start Left And Boring Fly Ash Pond Reserve And Boring Start Left And Amos Boring Products And**

AFP MOUNTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ \tilde{c} ã TIAIT ° **DOM NO** č ر
آرا $1/11/19$ AFP GDT ÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the section of the SHORING NO. MW-1805C Latter DATE 1/11/19 SHEET 2 OF 13 PROJECT LAmos Fly Ash Pond **Amos Fly Ash Pond Reserve Conduct And Amos Conducts And Amos Boring Fly Ash Pond Reserve And Boring Start Left And Boring Fly Ash Pond Reserve And Boring Start Left And Amos Boring Products And**

ÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **Amos Fly Ash Pond Reserve Conduct And Amos Conducts And Amos Boring Fly Ash Pond Reserve And Boring Start Left And Boring Fly Ash Pond Reserve And Boring Start Left And Amos Boring Products And**

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJÆP

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

COMPANY **American Electric Power**

BORING NO. <mark>MW-1805C</mark>____DATE_1/11/19_____SHEET __5___ OF ____13____ BORING START BORING FINISH **1/9/18 1/18/18 Amos Fly Ash Pond** COMPANY _**American Electric Power** BORING NO. <mark>MW-1805C _</mark> DATE <u>1/11/19 </u> SHEET _5 OF ___13 __

C:WSERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ $-1/11/1913.55$ AEP-AEP.GDT-

Continued Next Page

WV015976.0005 JOB NUMBER

LOG OF BORING

Amos Fly Ash Pond American Electric Power

PROJECT

DATE_**1/11/19** SHEET BORING START BORING FINISH **1/9/18 1/18/18** BORING NO. **1/11/19** SHEET **6 MW-1805C** COMPANY _**American Electric Power** BORING NO. <mark>MW-1805C _</mark> DATE <u>1/11/19 </u> SHEET _6__ OF __ 13 __

1/11/19 13:55 AFP GDT 心
坐

Continued Next Page
WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the section of the SHORING NO. NW-1805C Latter DATE 1/11/19 SHEET Table of the SHORING NO. Networking the SHEET Table of the SHORING NO. Networking the SHEET Table of the SHORING NO. PROJECT LAmos Fly Ash Pond **Amos Fly Ash Pond Reserve Conduct And Amos Conducts And Amos Boring Fly Ash Pond Reserve And Boring Start Left And Boring Fly Ash Pond Reserve And Boring Start Left And Amos Boring Products And**

AFP GDT 心
化

DOC OINIT

DODINIC

DECIVEOREOR MICOLE

פט וואר החפ

Continued Next Page

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antence Company of the Company of the Boring No. <u>MW-1805C DATE 1/11/19 SHEET 8 OF 13</u> PROJECT LAmos Fly Ash Pond **Amos Fly Ash Pond Reserve Conduct And Amos Conducts And Amos Boring Fly Ash Pond Reserve And Boring Start Left And Boring Fly Ash Pond Reserve And Boring Start Left And Amos Boring Products And**

AEP - AEP. GDT - 1/11/19 13:55 - C.WSERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER. GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

Continued Next Page

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY Lattric Antentic Lattric Power the section of the Section of the SHEET Section of the SH COMPANY **American Electric Power**

PROJECT LAmos Fly Ash Pond **Amos Fly Ash Pond Reserve Conduct And Amos Conducts And Amos Boring Fly Ash Pond Reserve And Boring Start Left And Boring Fly Ash Pond Reserve And Boring Start Left And Amos Boring Products And**

WV015976.0005 JOB NUMBER

PROJECT

Amos Fly Ash Pond COMPANY _**American Electric Power** BORING NO. <mark>MW-1805C _</mark> DATE <u>1/11/19 </u> SHEET _10 OF ___13 __ **American Electric Power**

DATE_**1/11/19** SHEET BORING START BORING FINISH **1/9/18 1/18/18** BORING NO. **1/11/19** SHEET **10 MW-1805C**

ÆP-

Continued Next Page

WV015976.0005 JOB NUMBER

PROJECT

Amos Fly Ash Pond American Electric Power

DATE_**1/11/19** SHEET BORING START BORING FINISH **1/9/18 1/18/18** BORING NO. <mark>MW-1805C __</mark>_ DATE_1/11/19 ___ SHEET _11 __ OF ___13 __ **11** OF COMPANY _**American Electric Power** BORING NO. <mark>MW-1805C _</mark> DATE <u>1/11/19 </u> SHEET _<u>11 </u> OF ___<u>13</u> _

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJÆP

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Lattric Antentic Lattric Power the section of the Series of the SHEET SHEET Lattrice of the SHEET Lattri PROJECT LAmos Fly Ash Pond **Amos Fly Ash Pond Reserve Conduct And Amos Conducts And Amos Boring Fly Ash Pond Reserve And Boring Start Left And Boring Fly Ash Pond Reserve And Boring Start Left And Amos Boring Products And**

WV015976.0005 JOB NUMBER

ã TINIT °

סמו וואר

č

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Lattric Antence Company of the Company of the Boring No. 2010, 2020, 2 PROJECT LAmos Fly Ash Pond **Amos Fly Ash Pond Reserve Conduct And Amos Conducts And Amos Boring Fly Ash Pond Reserve And Boring Start Left And Boring Fly Ash Pond Reserve And Boring Start Left And Amos Boring Products And**

WV015976.0005 JOB NUMBER

PROJECT Lamos Fly Ash Pond **Amos Fly Ash Pond**

WV015976.0005 JOB NUMBER

PROJECT

Amos Fly Ash Pond American Electric Power

DATE_**1/11/19** SHEET BORING START BORING FINISH **3/28/18 4/3/18** BORING NO. <mark>MW-1806A __</mark>_ DATE_1/11/19 ___ SHEET __2 __ OF ____4 __ COMPANY _**American Electric Power** BORING NO. <mark>MW-1806A </mark> DATE <u>1/11/19 </u> SHEET _2 OF ___4 __

2 OF

WV015976.0005 JOB NUMBER

LOG OF BORING

American Electric Power

PROJECT

Amos Fly Ash Pond

DATE_**1/11/19** SHEET BORING START BORING FINISH **3/28/18 4/3/18** BORING NO. WW-1806A ___ DATE_1/11/19 ___ SHEET __3 __ OF ____4 __ **3** OF COMPANY _**American Electric Power** BORING NO. <mark>MW-1806A </mark> DATE <u>1/11/19 </u> SHEET _3 OF ___4 __

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

Amos Fly Ash Pond COMPANY _**American Electric Power** BORING NO. <mark>MW-1806A </mark> DATE <u>**1/11/19** SHEET _4 </u> OF ___4___ **American Electric Power**

DATE_**1/11/19** SHEET BORING START BORING FINISH **3/28/18 4/3/18** BORING NO. <mark>MW-1806A _</mark> DATE_1/11/19 _ SHEET _4 _ OF ___4 _ **4** OF

WV015976.0005 JOB NUMBER

PROJECT Lamos Fly Ash Pond **Amos Fly Ash Pond**

AEP - AEP.ODT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.OPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latter Mathematic Company of the company of the setterman of PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ心
坐

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mathematic Company of the company of the set of the s PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJم
پا

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

Amos Fly Ash Pond American Electric Power

DATE_**1/11/19** SHEET BORING START BORING FINISH **3/28/18 4/3/18** BORING NO. WW-1806B DATE 1/11/19 SHEET 4 OF 9 **4** OF COMPANY _**American Electric Power** BORING NO. <mark>MW-1806B </mark> DATE <u>**1/11/19** SHEET _4 </u> OF ___9___

心
华

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the Company of the Mate of the SHEET State of the S PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

AEP.GDT - 1/11/19 13:55 - C:USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJAEP-

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

COMPANY _**American Electric Power** BORING NO. <mark>MW-1806B </mark> DATE <u>**1/11/19** </u>SHEET _6 OF ___ 9 __ **American Electric Power**

Amos Fly Ash Pond

DATE_**1/11/19** SHEET BORING START BORING FINISH **3/28/18 4/3/18 BORING NO. <mark>MW-1806B</mark>___DATE_1/11/19**____SHEET __6___OF ____**9**____

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mathematic Company of the company of the set of the s PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** DODINIC DESKTOPIEOP NICOLE פט וואר החפ C-N ICE 1/11/19 13:55 AFP GDT 心
化

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY Latter Mathematic Company of the company of the set of the s PROJECT Lamos Fly Ash Pond **Amos Fly Ash Pond** COMPANY **American Electric Power**

BORING START BORING FINISH **3/28/18 4/3/18**

AEP - AEP.GDT - 1/11/19 13:55 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJAEP.GDT - 1/11/19 13:55 - C:\USERS\LWO AEP-1

Continued Next Page

3/4 (Dark Reddish Brown) with gray mottling at 202.6' bgs; fine-grained texture with 2-3 cm limestone fragments from 196.5-202.6' bgs; massive structure; moderately decomposed with layers of high decomposition; moderately disintegrated with mottling; slicken-slides at 200
196.2', 196.5', 202.6', 205.5', and 205.6' bgs.

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY Latter Mathematic Company of the company of the setterment of the sett COMPANY **American Electric Power**

PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

WV015976.0005 JOB NUMBER

PROJECT Lamos Fly Ash Pond **Amos Fly Ash Pond**

GROUND ELEVATION 889.0

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1806C </u> DATE_<u>1/11/19 </u> SHEET _2 OF ___12___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** DODINIC DECIVEOREOR MICOLE פט וואר החפ C-N ICE <u>ፍ</u> $1/11/1913$ AFP GDT 心
化

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1806C </u> DATE_<u>1/11/19 </u> SHEET__3 _OF ___12___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJЩ

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1806C </u> DATE_<u>1/11/19 </u> SHEET__4 OF ___12___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** DODINIC DESKTOPIEOP NICOLE פט וואר החפ **C-NICE** 1/11/19 13:56 AFP GDT 心
化

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** OINIC NINO I DECKTODEOD ספון ווארחרים ě \overline{a} <u>ፍ</u> $1/11/1913$ AFP GDT 心
化

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

Amos Fly Ash Pond American Electric Power

DATE_**1/11/19** SHEET BORING START BORING FINISH **3/28/18 4/3/18** BORING NO. **1/11/19** SHEET **MW-1806C 6** OF COMPANY _**American Electric Power** BORING NO. <mark>MW-1806C _</mark> DATE_<mark>1/11/19 _</mark> SHEET _6__ OF __ 12___

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1806C </u> DATE_<u>1/11/19 </u> SHEET _7 _OF ___12___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

AEP - AEP. GDT - 1/11/19 13:56 - C.WSERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER. GPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

WV015976.0005 JOB NUMBER

LOG OF BORING

PROJECT Lamos Fly Ash Pond **Amos Fly Ash Pond COMPANY** American Electric Power

COMPANY _**American Electric Power BORING NO. <u>MW-1806C </u> DATE_<u>1/11/19 </u> SHEET__8 _OF ___12___** BORING START BORING FINISH **3/28/18 4/3/18**

RQD SAMPLE NUMBER SAMPLESTANDARD SAMPLE STANDARD $\frac{x}{10}$ RQD DEPTH $\frac{10}{10}$ or SOIL ROCK $\frac{11}{10}$ DRILLER'S

IN FEET RESISTANCE $\begin{bmatrix} 2 & 0 & 0 \\ 0 & 0 & 0 \\ 0 & 0 & 0 \\ 0 & 0 & 0 \end{bmatrix}$ SOIL ROCK $\begin{bmatrix} 1 & 0 & 0 \\ 0 & 1 & 0 \\ 0 & 0 & 0 \\ 0 & 0 & 0 \end{bmatrix}$ DRILLER' DEPTH

IN
BOOT

FEET
BOOT SOIL / ROCK DRILLER'S DEPTH PENETRATION넍듰벡 I ... F IN 1G 이 인 이 시 IN FEET | RESISTANCE | RESISTANCE b츄워 % | ¨` | IDENTIFICATION NOTES % FEET $|5|$ \supset 120 100 16 | RC | 170.7 | 180.7 | 180.7 170.7 180 17 RC 180.7 180.7-181.4': SANDSTONE grading to Shale at 190.7 180.7 NR | ⊣_{∷∷}| |18 base; strong field strength; GLEY 1 6/N (Gray); fine-grained texture; thinly bedded; fresh; competent; unfractured. 181.4-190.7': SHALE with Sandstone lenses with mud from 182.3-182.5' bgs; moderate field 183-220': Bentonite strength; GLEY 1 5/N (Gray) grading to 2.5YR Seal 3/4 (Dark Reddish Brown) at 182.7' bgs; fine-grained texture; thinly bedded; slightly to 185 \equiv | moderately decomposed with layers of high decomposition between beds in the top 1.5' bgs; slightly to moderately disintegrated with mottling, iron staining, and calcite in the 184.5-184.9' bgs Sandstone lens; vertical AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJfracture filled with clay at 188.8' bgs. 190 $\overline{190.7}$ 190.7-196.5': SHALE; moderate field strength; 18 RC 195.7 190.7 60 100 GLEY 1 5/N (Gray) with red mottling; fine-grained texture; thinly bedded; slightly decomposed; moderately disintegrated with red mottling; slicken-slides at 192.3', 192.5', 195.1', and 195.4' bgs, no mineralization. 195 19 RC 195.7 205.7 195.7 120 | 100 | | | | | | 196.5-205.9': SHALE, weathered; weak field strength; GLEY 1 5/N (Gray), becomes 2.5YR 3/4 (Dark Reddish Brown) with gray mottling at 202.6' bgs; fine-grained texture with 2-3 cm limestone fragments from 196.5-202.6' bgs; massive structure; moderately decomposed with layers of high decomposition; moderately disintegrated with mottling; slicken-slides at 200 **196.2'**, 196.5', 202.6', 205.5', and 205.6' bgs. AEP-

Continued Next Page

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** OINIC NINO I **DECKTODEOD** ספון ווארחרים ě ć <u>ፍ</u> $1/11/1913$ AFP GDT 心
化

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1806C </u> DATE_<u>1/11/19 </u> SHEET_<u>10</u> OF ___12___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** DODINIC DECIVEOREOR MICOLE פט וואר החפ C-N ICE <u>ፍ</u> $1/11/1913$ AFP GDT 心
化

Continued Next Page

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1806C </u> DATE_<u>1/11/19 </u> SHEET_<u>11</u> OF ___12___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJÆP

Continued Next Page

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

ã TINIT °

DOM NO

č

خ
پو

COMPANY _**American Electric Power BORING NO. <u>MW-1806C </u> DATE_<u>1/11/19 </u> SHEET_<u>12</u> OF __1<u>2</u>__** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts Amos And Amos Conducts And Amos Conducts Amos Conducts And Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conducts Amos Conduc**

WV015976.0005 JOB NUMBER

PROJECT Lamos Fly Ash Pond **Amos Fly Ash Pond**

AEP - AEP.ODT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.OPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

WV015976.0005 JOB NUMBER

LOG OF BORING

American Electric Power

PROJECT

Amos Fly Ash Pond

DATE_**1/11/19** SHEET BORING START BORING FINISH **5/15/18 5/16/18 BORING NO. <mark>MW-1807A __</mark>__ DATE_1/11/19 _____ SHEET __2___ OF ____ 5____** COMPANY _**American Electric Power** BORING NO. <mark>MW-1807A _</mark> DATE_1/11/19 __ SHEET _2 __OF ___5 ___

ÆP

Continued Next Page

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the Company of the Company of the Sheet of the Sheet of the Sheet of the S PROJECT LAmos Fly Ash Pond **All the Community Commun**

AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ₽

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mate of the Section Electric Power the Section of Sections of the Section of the Section of the S PROJECT LAmos Fly Ash Pond **All the Community Commun**

FII FSVAFP MOLINTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** DODINIC DECI/TODIEOD MIOOLE פט וואר החפ C-N ICE <u>ፍ</u> $1/11/1913$ AFP GDT 心
化
WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY Latterican Electric Power the section of the sect **American Electric Power**

massive structure; moderately to highly decomposed; moderately disintegrated, mottled clay-filled fractures; moderately

fractured.

120

103-104': Loss of water circulation. 109': Return of water. 120 20 104.0 RC 94.0 114.0 124.0 114.0 10 | RC | 104.0 | 114.0 | 11 | RC | 114.0 | 124.0 | $\overline{\mathsf{NR}}$ $\overline{}$ 20 84 **Figure** 9 RC 94.0 102.5-104': SANDSTONE; strong field
strength; GLEY 6/N (Gray); fine-grained
texture; thinly bedded; fresh; moderately
disintegrated, significant iron staining in
fractures; moderately fractured, large vertical
fracture wit strength; GLEY 6/N (Gray); fine-grained texture; thinly bedded; fresh; moderately disintegrated, significant iron staining in fractures; moderately fractured, large vertical $f[0.5]$ | $\lceil \frac{1}{2} \rceil$ | $\lceil \frac{1}{2} \rceil$ | fracture with iron staining from 103.3-104' bgs, $\lceil \frac{1}{2} \rceil$ no calcite. 104-113': SANDSTONE; strong field strength; GLEY 6/N (Gray); fine-grained texture; thinly bedded; fresh; moderately disintegrated from 104-105.8' bgs, significant iron staining; slightly fractured. 113-115.2': SHALE; moderate field strength; GLEY 3/N (Very Dark Gray), lightens with depth; fine-grained texture; massive structure; slightly to moderately decomposed; slightly 115 \equiv disintegrated; moderately fractured. 115.2-116': SHALE; moderate to weak field strength; 10R 4/3 (Brown); fine-grained texture; RQD SAMPLE NUMBER SAMPLESTANDARD PENETRATION넍듰벡 I ... F RESISTANCE b츄워 % | ¨` | SAMPLE STANDARD $\frac{x}{10}$ RQD DEPTH $\frac{10}{10}$ or SOIL ROCK $\frac{11}{10}$ DRILLER'S

IN FEET RESISTANCE $\begin{bmatrix} 2 & 0 & 0 \\ 0 & 0 & 0 \\ 0 & 0 & 0 \\ 0 & 0 & 0 \end{bmatrix}$ SOIL ROCK $\begin{bmatrix} 1 & 0 & 0 \\ 0 & 1 & 0 \\ 0 & 0 & 0 \\ 0 & 0 & 0 \end{bmatrix}$ DRILLER' % DEPTH

IN
BOOT

FFFT
BOOTS IN 1G 이 인 이 시 FEET $|5^-|$ = SOIL / ROCK IDENTIFICATION DRILLER'S NOTES DEPTH IN FEET | RESISTANCE | BORING START BORING FINISH **5/15/18 5/16/18** 100 110 PROJECT **Amos Fly Ash Pond**

WV015976.0005 JOB NUMBER

PROJECT **Amos Fly Ash Pond**

AEP - AEP.ODT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.OPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the PROJECT LAmos Fly Ash Pond **All the Community Commun**

AFP GDT 心
化

DOC OINIT

OINIC

DECKTODEOD

ספון ווארחרים

ě č

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the PROJECT LAmos Fly Ash Pond **All the Community Commun**

AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ₽

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

American Electric Power

Amos Fly Ash Pond

DATE<u>_**1/11/19**__</u>__SHEET BORING START BORING FINISH **5/15/18 5/16/18** BORING NO. <mark>MW-1807B </mark> DATE <mark>1/11/19 </mark>SHEET _ **4** OF ____**9**___ **4** OF COMPANY _**American Electric Power** BORING NO. <mark>MW-1807B </mark> DATE <u>**1/11/19** SHEET _4 </u> OF ___9___

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY Latter Mate of the Company **American Electric Power**

PROJECT LAmos Fly Ash Pond **All the Community Commun**

WV015976.0005 JOB NUMBER

LOG OF BORING

American Electric Power

PROJECT

Amos Fly Ash Pond

DATE<u>_**1/11/19**__</u>__SHEET BORING START BORING FINISH **5/15/18 5/16/18 BORING NO. <mark>MW-1807B</mark>___DATE_1/11/19____SHEET __6___**OF ____**9____** COMPANY _**American Electric Power** BORING NO. <mark>MW-1807B </mark> DATE <u>**1/11/19** </u>SHEET _6 OF ___ 9 __

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

American Electric Power

Amos Fly Ash Pond

DATE<u>_**1/11/19**__</u>__SHEET BORING START BORING FINISH **5/15/18 5/16/18** BORING NO. <mark>MW-1807B </mark> DATE <mark>1/11/19 </mark>SHEET _ **7** OF ____**9**___ COMPANY _**American Electric Power** BORING NO. <mark>MW-1807B </mark> DATE <u>**1/11/19** SHEET _7 </u> OF ___**9**___

7 OF

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mathematic Company of the company of the company of the company $\frac{1}{11}$ of the company $\frac{9}{100}$ PROJECT LAmos Fly Ash Pond **All the Community Commun**

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mathematic Company of the company of the company of the company $\frac{1}{11}$ of the company $\frac{9}{100}$ PROJECT LAmos Fly Ash Pond **All the Community Commun**

WV015976.0005 JOB NUMBER

COMPANY American Electric Power

COORDINATES **N 530,578.0 E 1,723,313.9** PROJECT **Amos Fly Ash Pond**

GROUND ELEVATION 857.6

N 530,578.0 E 1,723,313.9 PIEZOMETER TYPE **NA** WELL TYPE OW **NARCH STATE OW** HGT. RISER ABOVE GROUND SYSTEM DIA **857.6 NAD83/NAVD88 2.98 2"** DEPTH TO TOP OF WELL SCREEN **84.2** BOTTOM **109.2** WELL DEVELOPMENT BACKFILL **Surge/Purge Bentonite Grout** FIELD PARTY **Zachary Racer (AEP)** RIG **Direct Circulation - Wireline Core** COMPANY _**American Electric Power BORING NO. <u>MW-1808A </u> DATE_<u>1/11/19 </u> SHEET _1__ OF ___ 5___** BORING START $-4/17/18$ BORING FINISH $-4/19/18$

AEP - AEP.GDT - 1/11/19 13:56 - C:WSERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS_GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1808A </u> DATE_<u>1/11/19 </u> SHEET _2 OF ___ 5___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos C**

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

American Electric Power

Amos Fly Ash Pond

DATE<u>_**1/11/19**__</u>__SHEET BORING START $-4/17/18$ BORING FINISH $-4/19/18$ BORING NO. <mark>MW-1808A __</mark>_ DATE_1/11/19 ___ SHEET __3 __ OF ____5 __ COMPANY _**American Electric Power** BORING NO. <mark>MW-1808A </mark> DATE <u>1/11/19 </u> SHEET _3 OF ___5 __

3 OF

AEP-AEP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY _**American Electric Power** BORING NO. <mark>MW-1808A </mark> DATE <u>1/11/19 </u> SHEET _4 OF ___ 5 __ **American Electric Power**

PROJECT

心
华

Amos Fly Ash Pond

DATE<u>_**1/11/19**__</u>__SHEET BORING START $-4/17/18$ BORING FINISH $-4/19/18$ **BORING NO. <mark>MW-1808A</mark> DATE_1/11/19 SHEET_4_ OF__5__**

WV015976.0005 JOB NUMBER

PROJECT

心
华

LOG OF BORING

American Electric Power

Amos Fly Ash Pond

DATE<u>_**1/11/19**__</u>__SHEET BORING START $-4/17/18$ BORING FINISH $-4/19/18$ **BORING NO. <mark>MW-1808A _</mark>__ DATE_1/11/19 ____ SHEET __5 ___ OF ____ 5 ___** COMPANY _**American Electric Power** BORING NO. <mark>MW-1808A </mark> DATE <u>1/11/19 </u> SHEET _5 OF ___5___

WV015976.0005 JOB NUMBER

PROJECT **Amos Fly Ash Pond**

GROUND ELEVATION 857.6

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1808B </u> DATE_<u>1/11/19 </u> SHEET _2 OF ___7___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos C**

AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINIT** DODINIC DECIVEOREOR MICOLE פט וואר החפ C-N ICE <u>ፍ</u> $1/11/1913$ AFP GDT 心
化

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

American Electric Power

BORING NO. <mark>MW-1808B</mark>____DATE_1/11/19____SHEET __**3**___OF ____**7**____ Amos Fly Ash Pond **Example 20 BORING START** 2017/18 COMPANY _**American Electric Power** BORING NO. <mark>MW-1808B </mark> DATE <u>1/11/19 </u> SHEET __3 OF ____7____

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1808B </u> DATE_<u>1/11/19 </u> SHEET__4 OF ___7___**

PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos C**

AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJخ
پ

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos C**

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1808B </u> DATE_<u>1/11/19 </u> SHEET _6 OF ___7___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos C**

AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ₽

WV015976.0005 JOB NUMBER

PROJECT

₽

LOG OF BORING

American Electric Power

Amos Fly Ash Pond

DATE<u>_**1/11/19**__</u>__SHEET BORING START $-4/17/18$ BORING FINISH $-4/19/18$ **BORING NO. <mark>MW-1808B</mark>___DATE_1/11/19**____SHEET __**7**____OF ____**7**____ COMPANY _**American Electric Power** BORING NO. <mark>MW-1808B </mark> DATE <u>1/11/19 </u> SHEET _7 _OF ___7___

WV015976.0005 JOB NUMBER

COMPANY American Electric Power

COORDINATES **N 530,573.8 E 1,723,321.9** PROJECT **Amos Fly Ash Pond**

GROUND ELEVATION 857.5

N 530,573.8 E 1,723,321.9 PIEZOMETER TYPE **NA** WELL TYPE OW **NARCH STATE** HGT. RISER ABOVE GROUND SYSTEM DIA **857.5 NAD83/NAVD88 2.99 2"** DEPTH TO TOP OF WELL SCREEN **215** BOTTOM **240** WELL DEVELOPMENT BACKFILL **Surge/Purge Bentonite Grout** FIELD PARTY **Zachary Racer (AEP)** RIG **Direct Circulation - Wireline Core** COMPANY _**American Electric Power BORING NO. <u>MW-1808C </u> DATE_<u>1/11/19 </u> SHEET _1___OF ___12___** BORING START $-4/17/18$ BORING FINISH $-4/19/18$

AEP - AEP.GDT - 1/11/19 13:56 - C:WSERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1808C </u> DATE_<u>1/11/19 </u> SHEET _2 OF ___12___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos C**

ÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

PROJECT **Amos Fly Ash Pond**

COMPANY Latterican Electric Power the section of the sect BORING START $-4/17/18$ BORING FINISH $-4/19/18$

120 | NR | $\qquad \qquad$ 49.0 39.0 5 | RC | 49.0 | 59.0 | 4 | RC | 39.0 | 49.0 | NR disintegrated; unfractured. 51.8-56.5': SHALE, Sandy Calcite beds; strong field strength; GLEY 1 5/N (Gray); fine-grained texture; thinly bedded; slightly decomposed; slightly to moderately disintegrated, two large calcite channels; moderately fractured at 56.5' bgs. RQD SAMPLE NUMBER SAMPLESTANDARD PENETRATION넍듰벡 I ... F RESISTANCE b츄워 % | ¨` | SAMPLE STANDARD $\frac{x}{10}$ RQD DEPTH $\frac{10}{10}$ or SOIL ROCK $\frac{11}{10}$ DRILLER'S

IN FEET RESISTANCE $\begin{bmatrix} 2 & 0 & 0 \\ 0 & 0 & 0 \\ 0 & 0 & 0 \\ 0 & 0 & 0 \end{bmatrix}$ SOIL ROCK $\begin{bmatrix} 1 & 0 & 0 \\ 0 & 1 & 0 \\ 0 & 0 & 0 \\ 0 & 0 & 0 \end{bmatrix}$ DRILLER' $\%$ $\begin{bmatrix} 1N & \frac{15}{6} & \frac{5}{6} \\ -\frac{1}{6} & \frac{15}{6} & \frac{15}{6} \end{bmatrix}$ DEPTH <u>O</u>

IN BAO O

SO O FEET | 0 | 1 | 1 SOIL / ROCK
ENTIFICATION IDENTIFICATION DRILLER'S NOTES DEPTH IN FEET | RESISTANCE | $50 \leftarrow$ $\qquad \qquad$

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

American Electric Power

Amos Fly Ash Pond

DATE<u>_**1/11/19**__</u>__SHEET BORING START $-4/17/18$ BORING FINISH $-4/19/18$ **BORING NO. <mark>MW-1808C</mark>____DATE_1/11/19_____SHEET__4___ OF ___12__________________** COMPANY _**American Electric Power** BORING NO. <mark>MW-1808C </mark> DATE <u>1/11/19 </u> SHEET _4 OF __12__

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos C**

心
华

WV015976.0005 JOB NUMBER

LOG OF BORING

American Electric Power

PROJECT

Amos Fly Ash Pond

DATE<u>_**1/11/19**__</u>__SHEET BORING START $-4/17/18$ BORING FINISH $-4/19/18$ BORING NO. **1/11/19** SHEET **6 MW-1808C** COMPANY _**American Electric Power** BORING NO. <mark>MW-1808C </mark> DATE <u>1/11/19 </u> SHEET _6 OF ___12___

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1808C </u> DATE_<u>1/11/19 </u> SHEET _7 _OF ___12___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos C**

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1808C </u> DATE_<u>1/11/19 </u> SHEET__8 _OF ___12___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos C**

 $1/11/1913$ AFP GDT 心
化

DOC OINIT

OINIC

DECI/TODIEOD MIOOLE

ספון ווארחרים

C-N ICE

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos C**

AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ₽

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1808C </u> DATE_<u>1/11/19 </u> SHEET_<u>10</u> OF ___12___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos C**

AEP.GDT - 1/11/19 13:56 - C:USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJAEP-.

WV015976.0005 JOB NUMBER

 \tilde{c} ã TIAIT °

DON INC

č

LOG OF BORING

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1808C </u> DATE_<u>1/11/19 </u> SHEET_<u>11</u> OF ___12___** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos C**

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COMPANY _**American Electric Power BORING NO. <u>MW-1808C </u> DATE_<u>1/11/19 </u> SHEET_<u>12</u> OF __1<u>2</u>__** PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos C**

ESVAFP MOUNTAINFFR GPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJã TINIT ° אטוואנט č ို့ $1/11/19$ AFP GDT خ
پ

Water Level, ft $\vert \overline{\underline{\checkmark}}$ **47.9** $\vert \overline{\underline{\checkmark}}$ **1** TIME DATE **7/18/2018** GROUND ELEVATION HGT. RISER ABOVE GROUND SYSTEM DIA **738.1 NAD83/NAVD88 3.03 2" N 530,459.4 E 1,722,189.3** PIEZOMETER TYPE **NA** WELL TYPE OW **NARCH STATE** DEPTH TO TOP OF WELL SCREEN **57** BOTTOM **72** WELL DEVELOPMENT BACKFILL **Surge/Purge Bentonite Grout** FIELD PARTY **Zachary Racer (AEP)** RIG **Direct Circulation -** COORDINATES **N 530,459.4 E 1,722,189.3 Wireline Core** S_{SMDL} S_{SMDL} S_{SMDL} COMPANY Latter Mathematic Company of the company of the company of the company $\overline{0}$ of the company $\overline{0}$ of the company $\overline{0}$ of the company $\overline{0}$ of the company of the company $\overline{0}$ of the company of the c BORING START BORING FINISH **3/1/18 3/2/18 WV015976.0005** JOB NUMBER PROJECT **Amos Fly Ash Pond COMPANY** American Electric Power

INICCD

-nand

č,

Ĕ Ę

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latter Mate of the Company of the

 $\mathsf{40} \rightarrow$. \Box anfractured.

114

95

RC 35.8 | 45.8 | |

AEP.GDT - 1/11/19 13:56 - C:WSERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJAEP-1

 2 RC 35.8

Continued Next Page

43.8-45.8': SHALE; weak field strength; 5YR 3/2 (Dark Reddish Brown); fine-grained texture;

45 \leftarrow | laminated structure; moderately decomposed; | | | | moderately disintegrated; unfractured.

moderately disintegrated; unfractured.

38.3-43.8': SANDSTONE; strong field strength; GLEY 1 4/5G_/1 (Grayish Green); fine-grained texture; thinly cross-bedded; fresh; competent;
WV015976.0005 JOB NUMBER

PROJECT

American Electric Power

DATE_**1/11/19** SHEET BORING NO. <mark>MW-1809A __</mark>_ DATE_1/11/19 ___ SHEET __3 __ OF ____6 __ COMPANY _**American Electric Power** BORING NO. <mark>MW-1809A </mark> DATE <u>**1/11/19** SHEET _3 </u>_OF ___6___

BORING START BORING FINISH **3/1/18 3/2/18 3** OF **Amos Fly Ash Pond**

AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ₽

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY Latterican Electric Power the section of the sect COMPANY **American Electric Power**

PROJECT LAmos Fly Ash Pond **All and Amos Conducts Are Assembly Conducts Are a** Boring Finish 2017/18 to the service of the service o

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **All and Amos Conducts Are Assembly Conducts Are a** Boring Finish 2017/18 to the service of the service o

 $1/11/1913$ AFP GDT 心
化

DOC OINIT

OINIC

NINO I

DECKTODEOD

ספון וואר הריס

ě č

Continued Next Page

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Entertial Contract Contract of the Contract of the Boring No. <u>MW-1809A DATE 1/11/19 SHEET 6 OF 6 C</u> PROJECT LAmos Fly Ash Pond **All and Amos Conducts Are Assembly Conducts Are a** Boring Finish 2017/18 to the service of the service o

WV015976.0005 JOB NUMBER

COMPANY **American Electric Power**

COORDINATES **N 530,152.2 E 1,723,192.4** PROJECT Lamos Fly Ash Pond **Amos Fly Ash Pond**

GROUND ELEVATION 735.3 ______SYSTEM <u>NAD83/NAVD8</u>8_HGT. RISER ABOVE GROUND_ $\overline{3.07}$ **____________DIA __2" N 530,152.2 E 1,723,192.4** PIEZOMETER TYPE **NA** WELL TYPE OW **NARCH POW** DEPTH TO TOP OF WELL SCREEN **60** BOTTOM **80** WELL DEVELOPMENT BACKFILL **Surge/Purge Bentonite Grout** FIELD PARTY **Zachary Racer (AEP)** RIG **Direct Circulation - Wireline Core** COMPANY _**American Electric Power BORING NO. <u>MW-1810A </u> DATE_<u>1/11/19 </u> SHEET__1___OF ___6___** BORING START BORING FINISH **2/26/18 2/27/18**

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos Conducts Amos Conducts And Amos Condu**

AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJ**DOC OINT** DODINIC **PSI WOODSIDESKTOPIEOP NICOLE CALLOC** 1/11/19 13:56 AFP GDT خ
پ

WV015976.0005 JOB NUMBER

PROJECT

LOG OF BORING

American Electric Power

Amos Fly Ash Pond

DATE_**1/11/19** SHEET BORING START BORING FINISH **2/26/18 2/27/18** BORING NO. <mark>MW-1810A __</mark>_ DATE_1/11/19 ___ SHEET __3 __ OF ____6 __ **3** OF COMPANY _**American Electric Power** BORING NO. <mark>MW-1810A </mark> DATE <u>1/11/19 </u> SHEET _3 OF ___6 __

WV015976.0005 JOB NUMBER

LOG OF BORING

Amos Fly Ash Pond American Electric Power

PROJECT

DATE_**1/11/19** SHEET BORING START BORING FINISH **2/26/18 2/27/18** BORING NO. <mark>MW-1810A __</mark>_ DATE_1/11/19 ___ SHEET __4___ OF ____6___ **4** OF COMPANY _**American Electric Power** BORING NO. <mark>MW-1810A </mark> DATE <u>**1/11/19** SHEET _4 </u> OF ___6___

AEP - AEP.GDT - 1/11/19 13:56 - C:\USERS\LWOODS\DESKTOP\FOR NICOLE BORING LOGS GINT FILES\AEP MOUNTAINEER.GPJÆP

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Entertial Contract Contract of the Contract One of the SHEET Struck of the PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos Conducts Amos Conducts And Amos Condu**

PSI WOODSIDESKTOPIEOP NICOLE CALLOC 1/11/19 13:56 AFP GDT خ
پ

DOC OINT

DODINIC

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

 \tilde{c} Ē TINIT °

ă

č

خ
پ

COMPANY Latterican Electric Power the section of the sect PROJECT LAmos Fly Ash Pond **Amos And Amos Conduct And Amos Conducts And Amos Conducts Amos Conducts And Amos Condu**

West Virginia Department of Environmental Protection, 2018

Monitoring Well Construction Approvals

MW-1801A/B/C to MW-1810

 $\bar{1}$

 $\gamma_{\rm eff}$

 $\bar{.}$

 \sim

 $\bar{\epsilon}$

 $\hat{\mathcal{A}}$

 $\overline{}$

 $\sim 10^{-10}$

 $\hat{\mathbf{z}}$

 $\ddot{}$

 $\mathcal{A}^{\mathcal{A}}$

State of West Virginia Monitoring Well Construction Well Number: WV00528-0013-18 **Department of Environmental Protection** Approved **Site Name/Physical Address:** Well Registration No. WV00528-0013-18 **Purpose of Monitoring Well:** Grid Location: John E. Amos Plant Site: **Assessment** a. Latitude: 38 27 36 0 Line 1: 1530 Winfield Rd. b. Longitude: 81 50 17 0 Line 2: Winfield c. Method Used: **GPS** City: State: wv Company/Project Well No.: 25213-Zip: County: Putnam MW-1806B Well Owner (Name, Firm, Address): Installed By (Name, Firm, Address): Date Well Installed: Owner: American Electric Power Installer: AEP Dolan Lab 08/09/2018 4001 Bixby Rd. 1 Riverside Plaza Line 1: Line 1: Driller's WV Cert No. Line 2: Line 2: WV00528 Columbus City: City: Groveport State: OH State: OН 43125-Zio: 43215 Zip: 614-836-4200 Phone: 614-836-4200 Phone: Section B: (all number fields must be in decimal format) **YES** 1.Cap and Lock: Protective Cover Pipe 2. Protective Cover: 3. Monitoring Well Reference Point: 0 ft. 4. Borehole Diameter: 6 inches. 5.Ground Surface Seal: montrici ٣u a.Material: bentonite-cement grout b.Installation Procedure: gravity Y. 6.Surface Seal Bottom/Annular Space Top: 2_{ft} Ò 7. Well Riser: a.OD Well Riser: 2 inches. b.ID Well Riser: 1.98 inches. c.Material: PVC d.Installation Procedure: hand set 8.Annular Space Seal: a.Material: high solids grout b.Installation Procedure: tremie pipe-pumped 9. Well Development Procedure: airlift -10. Drilling Method Used: air rotary -11. Annular Space Seal Bottom/Filter Seal Top: 178.1 ft. 12. Drilling Fluid Used: Yes Source: Water 13. Filter Pack Seal: a.Material: bentonite pellet b.Installation Procedure: Gravity Fed c.Volume Added: 150 pounds 14. Bottom of Bentonite Seal/Filter Pack Top: 191.8 ft. 195.4 ft. 15. Depth to Top of Screen: 16.Screen: a.Material: PVC b.Installation Procedure: hand set c.Slot Size: 0.02 inches. d.Screen Length: 14.6 ft. 17. Filter Pack: a.Material: fine sand b.Installation Procedure: gravity 18.Well Depth: 210 ft. 19. Bottom of Filter Pack: 211 ft. 20. Bottom of Borehole: 211 ft. 21. Backfill Material (below filter pack): N/A 22. Decontamination Procedures: Liqui-Nox w/high pressure water pump 23. Special Circumstances and Exceptions: No Variance Number: 24.WV Contractor License No.

 $\hat{\mathcal{A}}$

APPENDIX C

Well Survey

Banks Well Report

Prepared for:

ARCADIS U.S., INC.-Columbus 630 Plaza Drive, Suite 600 Highlands Ranch, CO 80129

Water Well Report

AMOS PLANT WV PO #: WV015976.0004 ES-124909 Thursday, July 20, 2017

Geographic Summary

Location WV

Target location is 0.316 square miles and has a 6.52 mile perimeter

Summary Map - 0.5 Mile Buffer

Topographic Overlay Map - 0.5 Mile Buffer

Current Imagery Overlay Map - 0.5 Mile Buffer

Water Well Details

Well Summary

Dataset Descriptions and Sources

Disclaimer

The Banks Environmental Data Water Well Report was prepared from existing state water well databases and/or additional file data/records research conducted at the state agency and the U.S. Geological Survey. Banks Environmental Data has performed a thorough and diligent search of all groundwater well information provided and recorded. All mapped locations are based on information obtained from the source. Although Banks performs quality assurance and quality control on all research projects, we recognize that any inaccuracies of the records and mapped well locations could possibly be traced to the appropriate regulatory authority or the actual driller. It may be possible that some water well schedules and logs have never been submitted to the regulatory authority by the water driller and, thus, may explain the possible unaccountability of privately drilled wells. It is uncertain if the above listing provides 100% of the existing wells within the area of review. Therefore, Banks Environmental Data cannot fully guarantee the accuracy of the data or well location(s) of those maps and records maintained by the regulatory authorities.

Putnam County Public Services District Potable Water Survey

PROJECT NUMBER: COORDINATE SYSTEM: NAD 1983 StatePlane West Virginia South FIPS 4702 Feet
Appendix\AmosRegionalMapParcelsPortrait.mxd PLOTTED: 1/18/2019 11:23:35 AM BY: akens CITY: Novi DIV: ENV DB: TRY PIC: PM: TM: TR: PROJECT NUMBER: COORDINATE SYSTEM: NAD 1983 StatePlane West Virginia South FIPS 4702 Feet

NOTES:

Yes = Database and public record review indicate parcel is serviced by the public potable water supply confirmed by the Putnam County Public Service District.

No = Database and public record review were unable to determine the source for potable water for the parcel, if present.

APPENDIX D

Well Development Summary Table

NOTES:

Minimum purge volume is whichever is greater; 2x the volume of water introduced during drilling or 3x/10x the calculated well volume

If the well can be purged dry, 3x the well volume is the minimum target volume (unless 2x the volume of water introduced is greater)

If the well cannot be purged dry, 10x the well volume is the required minimum volume under west virginia law (unless 2x the volume of water introduced is greater)

ft = feet

bgs = below ground surface

amsl = above mean sea level

-- = not applicable

SRF = Stress Relief Fracture System

U = Upper Connellsville sandstone

C = Clarksburg disconformity (fissile shale and adjacent shale/sandstone

M = Morgantown sandstone and adjacent shale

APPENDIX E

Groundwater Model Details

APPENDIX E

GROUNDWATER FLOW MODEL SUMMARY

Introduction

Arcadis U.S., Inc. (Arcadis) developed a three-dimensional groundwater numerical flow model for the American Electric Power Service Corporation (AEP) Generating Plant (Plant) located on Winfield Road in Winfield, West Virginia to understand current hydrogeologic conditions and post-closure conditions after liner installation at the fly ash pond (FAP, CCR Unit). The groundwater flow model was constructed using the USGS MODFLOW code (McDonald and Harbaugh 1988) and utilized all available groundwater level data, aquifer testing data and lithologic data collected at the FAP (Site). The modeling discussed herein represents an update to the existing model developed for the Site (Arcadis, 2013). The primary objectives of the model updates are:

- Assess migration potential of site-related constituents of concern (COCs) under FAP closure condition; and
- Provide analytical parameters (i.e., groundwater flow directions and dilution factor) for geochemical evaluation and risk assessment to appraise potential changes in groundwater quality as well as possible impact to receptors from offsite migration and discharge of site-related COCs to adjacent surface water bodies.

Conceptual Site Model Updates

To assist with the update of the numerical model, a visual three-dimensional conceptual site model (CSM) of the Site was developed using Earth Volumetric Studio (EVS [Ctech, 2017]). The model was generated by sequential creation of various hydrostratigraphic model layers (geospatial, followed by hydrostratigraphic modeling) as well as other Site components as part of the CSM development. This visual model was created in a systematic fashion as follows:

- The topographical layer in the model was generated using the site geospatial and survey data (where available) as well as the digital elevation model (DEM) for the area from the geospatial database. The aerial and the various site features were imported from the geospatial database.
- The hydrostratigraphic model layers were developed by importing all site lithological logs from gINT format files, whereby the contacts of each geologic unit were identified based on the thorough review of each lithology boring and were then correlated to generate the geological surface. The hydrostratigraphic model was developed based on interpolation of the geological surfaces. These surfaces served as input to the updated numerical groundwater flow model.
- The onsite monitoring wells were also imported within the model based on well construction information.
- The ash volume was also represented by intruding between the ground surface that is prior to ash filling into the valley and the final construction surface of the fly ash pond.
- The other hydrologic features (i.e., surface water bodies) and dam structures were also incorporated into the visual three-dimensional CSM.

Numerical Groundwater Flow Model Development and Update

Model Discretization

The groundwater model grid covers an area of approximately 6.3 square miles. The horizontal finitedifference grid remains composed of 474 columns and 373 rows with grid spacing ranging from 10 ft by 10 ft in the vicinity of the Site to 90 ft by 90 ft along the most distant model boundaries. The model domain was designed to reflect all relevant hydraulic features within the surrounding area (i.e., Kanawha River and Bills Creek) and were located a sufficient distance from the Site to reduce the potential for boundary effects on simulated results. The model was rotated approximately 20 degrees counterclockwise to align with the prevailing groundwater flow directions at the Site and natural hydrologic boundaries.

The primary model updates involved modification of the model structure to reflect the updated hydrostratigraphic interpretation from the visual three-dimensional CSM. The revised groundwater model was discretized vertically into ten (10) model layers to provide a vertical profile representative of the Site hydrostratigraphic framework. Model layers 1 through 4 correspond to alternating sandstone and shale units including the Upper Connellsville sandstone and Lower Connellsville sandstone with silty to shaley interbeds. Model layers 5, 6, 7 and 8 correspond to the Clarksburg shale with siltstone and sandstone interbeds, Clarksburg highly fractured and weathered shale zone, Clarksburg shale with siltstone and sandstone interbeds and the Morgantown sandstone, respectively. Model layers 9 and 10 represent Birmingham red beds/shale with occasional sandstone (Graffton sandstone) and deep sandstone units, respectively.

Hydraulic Parameters

In the existing 2013 groundwater flow model, a background hydraulic conductivity value was assigned to each layer, with additional zones representing the fly ash pond (open water), upper fly ash, compacted fly ash, the fly ash impoundment dam, and alluvial material in the vicinity of the Kanawha River. Values of horizontal and vertical hydraulic conductivity for each of the model zones and layers are generally based upon hydraulic conductivity estimates for the appropriate material types and were varied during model calibration and sensitivity analysis. During the model updates, a new hydraulic conductivity zone was incorporated into the model to represent stress relief fracturing (SRF) discussed in Section 2.4 of this report. The hydraulic conductivity parameter values of the SRF and other zones representing the various hydrostratigraphic units were further adjusted in the model calibration process within a reasonable range as dictated by additional hydraulic testing results and regional hydrogeologic information. Given the importance of the SRF as a conduit for flow, the values of hydraulic conductivity for the SRF zones are generally much higher than values used to represent the less fractured portions of the units within each model layer.

arcadis.com

Boundary Conditions

Similar to the existing 2013 model, the updated flow model includes six types of boundary conditions: no flow, river (head dependent flow) to represent Kanawha River, drains (head dependent flow) to represent localized streams (i.e., Bills Creek), well (constant flux) for pumping wells, and groundwater recharge (constant flux). No changes were made to any boundary conditions from the existing 2013 model during the steady-state recalibration process except for the estimated rate of recharge and the drain cell configuration. The drain boundaries were re-assigned in each layer based on updated model structure.

Groundwater Flow Model Calibration

Steady State Calibration

After the model structural updates were completed, the groundwater flow model was re-calibrated to 2012 observed groundwater levels. The model was calibrated to water level data from monitoring wells across the Site. The use of point data eliminates the potential for interpretive bias that may result from attempting to match a contoured potentiometric surface (Konikow 1978; Anderson and Woessner 1992). During the steady-state model revision, flow calibration was performed to satisfy the following equations within pre-determined acceptance criteria (Arcadis 2013):

$$
RSTD = \sqrt{\frac{RSS}{n - p}}
$$
 (Eq.3-1)

and

$$
\overline{e} = \frac{1}{n} \sum_{i=1}^{n} e_i
$$
 (Eq.3-2)

where RSTD is the residual standard deviation, RSS is the residual sum of squares, and e is the mean of all residuals. The residual is simply defined as the difference between the observed and simulated water level elevation measured at a target location.

Model recalibration was achieved by adjusting relevant hydraulic parameters and zone extents until simulated conditions closely matched the observed conditions. The simulated groundwater flow condition of the re-calibrated steady-state model was then used as the starting condition for the transient model calibration for the FAP closure period.

arcadis.com

Transient Model Development

The transient or time-variant model was built to dynamically simulate the hydraulic variation within the impoundment prior to and during the geosynthetic cap installation.

For the transient model setup, the reclaimed water well was removed from the steady-state model as it was no longer operated during the liner installation based on communication with AEP staff. In addition, a dewatering well (DW-1) was introduced within the impoundment area near multi-port well STN-4-1 and was operated periodically during the construction phases.

Additionally, recharge zones were added within the FAP area and recharge values were adjusted to simulate the effect of liner installation processes from 2014 to 2017. The deployment of the geomembrane liner during Phase I construction began on June 25, 2015 and was completed on November 5, 2015 with 455 geomembrane panels installed. During Phase II construction, installation of the geomembrane began on May 31, 2016 and was completed on September 15, 2016 with 300 panels installed. During phase III construction, installation of the geomembrane began on April 13, 2017 was completed on July 15, 2017 with 81 panels installed. Based on this information, the simulation period was divided into 52 monthly stress periods to represent the temporal variations in precipitation recharge, aquifer storage, and groundwater levels.

Transient Model Calibration

The transient model was calibrated to time-varying groundwater levels collected from monitoring wells and piezometers between April 2014 and October 2018 by adjusting relevant storage parameters, dewatering well (DW-1) pumping rate, and the precipitation recharge distribution. **Figures 7A**, **7B** and **7C** illustrates the simulated groundwater elevation contours that represent October 2018 hydrologic conditions in the primary groundwater aquifer units at the Site (i.e. model layers 2, 6 and 8 representing Upper Connellsville sandstone, Clarksburg highly fractured and weathered shale zone, and Morgantown sandstone, respectively). As shown on **Figure 7A**, groundwater flows towards the Fly Ash Pond in the Upper Connellsville sandstone (model layer 2) from surrounding mountainous areas to the northwest and northeast and moves vertically downward to the lower layers. In model layer 6 (**Figure 7B**), outward radial flow patterns are maintained at the base of the impoundment, and groundwater discharges to the nearby surface water features (e.g., Bills Creek and Little Scary Creek) and migrates through SRF zones along the edge of the mountain to the deeper hydrogeologic units. In model layer 8 (i.e. Morgantown sandstone; **Figure 7C**), groundwater transmitted through SRF zones from the upper hydrogeologic units either discharges towards the Little Scary Creek and unnamed creek southwest of the dam, or continues to migrate vertically downward to Birmingham red beds and deep sandstone units and eventually discharges to the Kanawha River to the southeast. Overall, transient modeling results indicate that the simulated groundwater elevations have decreased up to approximately 10 feet from pre-closure conditions within the FAP area.

Pathline Analysis

A forward pathline analysis conducted using MODPATH (Pollock 1989) assisted in identifying the general flow patterns towards each monitoring well and surface water features. Particles were started in model layer 1 along the perimeter of the saturated fly ash deposit. Pathline analysis (**Figure E-1**) indicated that particles move laterally in model layer 1 within the FAP and then downward to model layers 2 to 9 with a simultaneous horizontal and downward trajectory. Particles generally show flow towards surface water features in model layers 2 through 8 with some of particles migrating to deeper layers where they ultimately discharge to the Kanawha River in model layer 9.

References

- McDonald, M.G. and Harbaugh, A.W. 1988. A modular three-dimensional finite difference groundwater flow model: U.S. Geological Survey Techniques of Water Resources Investigations Book 6, Chapter A1.
- Pollock, D.W. 1989. Documentation of computer programs to compute and display pathlines using results from the U.S. Geological Survey modular three-dimensional finite-difference ground-water flow model. U.S. Geological Survey Open-File Report 89-381.

APPENDIX F

Hydraulic Testing Results

Packer Test Logs

Test 1 Test 2

30

 $h1$ = distance between gage and water table $r =$ r = radius of test hole

h2 = applied pressure at gage A = length of test section

Reference

Pre-Test 1 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test Solution

Duration **Pressure Pressure Pressure** Pressure **Duration** Duration **Pressure** Pressure (mins) (psi) (mins) (psi)

Notes:

ft bgs- feet below ground surface gpm - gallons per minute cm/s - centimeters per second psi - pounds per square inch

ft amls - feet above mean sea level

NA - not available

N/A - not applicable

Test 1 Test 2

Constant Pressure (psi) 30 **60 Constant Pressure (psi)** 60

30

 $h1$ = distance between gage and water table $r =$ r = radius of test hole

h2 = applied pressure at gage A = length of test section

Reference

Pre-Test 1 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test Solution

Duration **Pressure Pressure Pressure** Pressure **Duration** Duration **Pressure** Pressure

Notes:

ft bgs- feet below ground surface gpm - gallons per minute cm/s - centimeters per second psi - pounds per square inch

ft amls - feet above mean sea level

NA - not available

N/A - not applicable

Test 1 Test 2

It

Constant Pressure (psi) Constant Pressure (psi) 100 15 0.0 N/A 1 15 87.60 0.3 30 0.3 h2 = applied pressure at gage A = length of test section 60 Elapsed Time (mins) Flow Totalizer Readings (gallons) Flow Rate (qpm) Borehole Water Level (ft)

Reference

Borehole Water Level (ft)

Pre-Test 1 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test Solution

Duration **Pressure Pressure Pressure** Pressure **Duration** Duration **Pressure** Pressure

Flow Totalizer Readings (gallons)

Flow Rate (gpm)

Notes:

ft bgs- feet below ground surface gpm - gallons per minute cm/s - centimeters per second psi - pounds per square inch

ft amls - feet above mean sea level

NA - not available

N/A - not applicable

Test 1 Test 2

60

Flow Rate (gpm)

Borehole Water Level (tt)

 $h1$ = distance between gage and water table $r =$ r = radius of test hole

h2 = applied pressure at gage A = length of test section

Reference

Pre-Test 1 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test Solution

Duration **Pressure Pressure Pressure** Pressure **Duration** Duration **Pressure** Pressure (mins) (psi) (mins) (psi)

Notes: ft bgs- feet below ground surface gpm - gallons per minute cm/s - centimeters per second psi - pounds per square inch ft amls - feet above mean sea level

NA - not available N/A - not applicable

Test 1 Test 2

Constant Pressure (psi) Constant Pressure (psi) 100

60

 $h1$ = distance between gage and water table $r =$ r = radius of test hole

h2 = applied pressure at gage A = length of test section

Reference

Pre-Test 1 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 US Department of Interior, Ground Water Manual, 1977, Packer Test Solution

Duration **Pressure Pressure Pressure** Pressure **Duration** Duration **Pressure** Pressure

Notes:

ft bgs- feet below ground surface gpm - gallons per minute cm/s - centimeters per second psi - pounds per square inch

ft amls - feet above mean sea level

- NA not available
- N/A not applicable

NR - not recorded

Flow Totalizer Readings (gallons) Flow Rate (gpm) Borehole Water Level (ft)

Test 1 Test 2

Constant Pressure (psi) 30 **Constant Pressure (psi)**

30

²⁵ tance between gage and water table r = radius of test hole

h2 = applied pressure at gage A = length of test section

Duration **Pressure Pressure Pressure** Pressure **Duration** Duration **Pressure** Pressure (mins) (psi) (mins) (psi)

Notes: ft bgs- feet below ground surface gpm - gallons per minute cm/s - centimeters per second psi - pounds per square inch

ft amls - feet above mean sea level

NA - not available

N/A - not applicable

NR - not recorded

Reference

Pre-Test 1 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test Solution

Well Yield Tests

AQTESOLV Plots

Well Yield Tests

Field Logs

Notes: MW-1808M depth to water measurements: 11:45 = 197.54 ft, 12:05 = 197.13 ft, 12:25 = 196.56 ft

Stopped collecting water level measurements on MW-1808M: depth to water decreasing from well development on 7/19/18 and removal of pump the morning of 7/20/18. Well is recovering from development.

Geophysical Logs

Marshal Miller & Associates, 2018

Geophysical Logs

MW-1801, MW-1802, MW-1805, MW-1806, and MW-1808

Acoustic Televiewer Interpretation

Well: 1801 AEP Amos Plant

Acoustic Televiewer Interpretation

MW 1802 AEP AMOS FAP

Acoustic Televiewer Interpretation

Well: 1805 AEP Amos Plant

Acoustic Televiewer Interpretation

Hole ID 1806 AEP ‐ Amos Plant

Electric Power Research Institute, 1999; Geological Logging Systems, 2002; H.C. Nutting Company, 2008; Cardno GLS, 2014

Geophysical Logs

MW-2, MW-4, & MW-5; MW-9 & MW-10; 2008-17; B-1401 & B-1402

ł

MW2 DENSITY LOG

MW2 GAMMA LOG

ţ

MW2 GAMMA LOG

 $\tilde{\mathcal{L}}$

MW2 API NEUTRON LOG

MW2 GAMMA LOG

MW2 NEUTRON LOG

MW2 GAMMA LOG

MW2 LATERAL **RESISTIVITY LOG**

 $\ddot{}$

MW2 RESISTIVITY (MG)

 $\hat{\boldsymbol{\epsilon}}$

 $\ddot{}$

MW2 SPOTANEOUS

 $\frac{1}{2} \frac{1}{2} \frac{1}{2}$

ŧ

Ť

 \bar{z}

MW4 TEMPERATURE LOG (WATER-FILLED BOREHOLE)

MW4 TEMPERATURE LOG (WATER-FILLED BOREHOLE)

 $\ddot{}$

DEGREES FAHRENHEIT

 $\ddot{}$

MW4 FLUID RESISTIVITY LOG (WATER-FILLED BOREHOLE)

(Continued) -160 -170 -180 -190 -200 -210 -220 -230 -240 -250 -260 -270 -280 -290 -300 -310 -320 \mathbf{c} 10 ${\bf 20}$ 30 40 **FLUID RESISTIVITY**

 \mathcal{I}

OHM-M

MW4 DENSITY LOG

 $\frac{1}{3}$

MW4 GAMMA LOG

MW4 DENSITY LOG

 ρ , ρ , ρ

MW4 API NEUTRON LOG

MW4 API NEUTRON LOG

MW4 NEUTRON LOG

MW4 NEUTRON LOG

(Continued)

 $\ddot{}$

MW4 LATERAL **RESISTIVITY LOG**

 $\bar{\epsilon}$

CPS

MW4 LATERAL **RESISTIVITY LOG**

MW4 LATERAL RESISTIVITY LOG

l,

 $\overline{}$

MW4 CALIPER LOG

MW4 RESISTIVITY (MG) LOG

MW4 CALIPER LOG

 $OHM-M$

MW4 SPOTANEOUS POTENTIAL LOG

MW4 SINGLE POINT **RESISTANCE LOG**

 mV

 $OHM-M$

MW4 RESISTIVITY LOG

 $\overline{\mathcal{C}}$

 \bar{z}

t,

 $\label{eq:reduced} \mathcal{L}^{(1)}(\mathcal{H}^{(1)}(\mathcal{H}_{\mathcal{M}_{1})})$

MW5 DENSITY LOG

 $\bar{1}$

 $\left\langle \right\rangle$

MW5 API NEUTRON LOG

MW5 NEUTRON LOG

i
K

 $\overline{\mathcal{L}}$

MW5 LATERAL RESISTIVITY LOG

 $\int\limits_{-\infty}^{\infty}e^{i\left(\frac{1}{2}\right) \tau}dt$

 $\label{eq:1} \begin{split} \mathcal{L}_{\text{in}}(\mathcal{L}_{\text{in}}) = \mathcal{L}_{\text{in}}(\mathcal{L}_{\text{in}}) \end{split}$

 $\left($

 $\overline{}$

 $\overline{\mathcal{C}}$

i
Santa C

Shaping the Future

Electric Log Interpretation Is Empirical In Nature. Extreme Hole Conditions Will Make Completely Accurate Interpretations Difficult.

All Services Provided Subject To Standard Terms And Conditions.

534 Industrial Park Road, Bluefield VA 24605 276-322-5467

B-1401 Gamma-Density Log

B-1402 Gamma-Density Log

534 Industrial Park Road, Bluefield VA 24605 276-322-5467

Electric Log Interpretation Is Empirical In Nature. Extreme Hole Conditions Will Make Completely Accurate Interpretations Difficult. All Services Provided Subject To Standard Terms And Conditions.

AEP CAN® POWFP

FGD LANDFILL-CCR REVISED GROUNDWATER MONITORING WELL NETWORK EVALUATION

Amos Plant Winfield Road Putnam County Winfield, West Virginia

May 27, 2020

FGD LANDFILL-CCR REVISED GROUNDWATER MONITORING WELL NETWORK EVALUATION

Everett Fortner III, PG **Senior Geologist**

Matthew J. Lamb **Project Manager**

Todd Minehardt, PE Principal Engineer

FGD LANDFILL-CCR REVISED GROUNDWATER MONITORING WELL NETWORK EVALUATION

Amos Plant **Winfield Road Putnam County** Winfield, West Virginia

Prepared for: American Electric Power Service Corporation

Prepared by: Arcadis U.S., Inc. 100 E Campus View Boulevard Suite 230 Columbus Ohio 43235-1447 Tel 614 985 9100 Fax 614 985 9170

Our Ref.: 30015982

Date: May 27, 2020

This document is intended only for the use of the individual or entity for which it was prepared and may contain information that is privileged, confidential and exempt from disclosure under applicable law. Any dissemination, distribution or copying of this document is strictly prohibited.

arcadis.com

kn verwisselsen ausgenung und der EUS teamsite/ARCADIS_Only/Amos/FGD Landfill CCR Reports/Well Network/2020-05-27-Final-Revised Well Network
Report/Amos-CCR-FGD Landfill-Revised Well Network Report-2020-05-27.docx

CONTENTS

arcadis.com

TABLES

Table 1. Water Level Data Table 2. Summary of Hydraulic Testing Results Table 3. Well Construction Details

FIGURES

- Figure 1. Site Location Map
- Figure 2. Plant and CCR Unit Location Map
- Figure 3. FGD Landfill Layout and Well Locations Map
- Figure 4. Stress Relief Fracture System Conceptual Site Model
- Figure 5. Cross Section Location Map
- Figure 6A. Cross Section A-A'
- Figure 6B. Cross Section B-B'
- Figure 6C. Cross Section C-C'
- Figure 7. Potentiometric Surface Map, November 22, 2010
- Figure 8. Monitoring Well Network Map

APPENDICES

- Appendix A Field Methodology
- Appendix B Boring/Well Construction Logs and Closure Information
- Appendix C Well Survey
- Appendix D Hydrographs and Hydraulic Testing Results

ACRONYMS AND ABBREVIATIONS

INTRODUCTION

This report was prepared by Arcadis U.S., Inc. (Arcadis) for American Electric Power Service Corporation (AEP) to assess the adequacy of the groundwater monitoring well network included in the Coal Combustion Residual (CCR) requirements, as specified in Code of Federal Regulations (CFR) 40 CFR 257.91, for the offsite flue gas desulfurization (FGD) landfill (CCR Unit) located approximately 2 miles northwest of the AEP Generating Plant (Plant) located on Winfield Road in Winfield, West Virginia (**Figure 1**). Specifically, this Groundwater Monitoring Well Network Evaluation report is intended to address the requirements of 40 CFR 257.91 excluding paragraphs (d) and (g) regarding the adequacy of the groundwater monitoring system. The CCR requirements include an evaluation of the adequacy of the groundwater monitoring well network to characterize groundwater quality up and down gradient of the CCR unit in the uppermost aquifer. The objective of this report is to present an evaluation of the adequacy of the groundwater monitoring well network in the uppermost aquifer at the offsite FGD Landfill (Site).

Two other regulated CCR units associated with the Plant were identified for review, which include the bottom ash pond (BAP) system and the fly ash pond (FAP) (**Figure 2**). The evaluations of the onsite BAP system and FAP are not included in this report and were completed under separate cover.

An initial evaluation of the FGD Landfill monitoring well network was completed in November 2015 and included a review of AEP-provided data associated with previously completed subsurface investigation activities in the vicinity of the FGD Landfill, as well as publicly available geologic and hydrogeologic data. Based on the initial evaluation, the monitoring well network included wells and piezometers that already existed at the Site. Additional analyses and understanding of the uppermost aquifer have provided information that supports re-evaluation of the previous monitoring well network that included shallow monitoring wells. To supplement the network, two additional deeper down gradient monitoring wells (MW-1801, MW-1802) screened in the uppermost aquifer were drilled and installed in August 2018. Drilling activities were performed by a West Virginia-licensed driller (AEP) with Arcadis personnel completing borehole logging and well installation oversight. These monitoring wells have been effectively added to the federal CCR Rule Groundwater Monitoring Network as of the date of this report.

The following report presents the current Conceptual Site Model (CSM) based on a combination of historic site data, regional data for the Site and surrounding vicinity, site-specific investigations completed through 2018, and permit documentation. This report also includes a description of the uppermost aquifer and the revised monitoring well network. The revised monitoring well network was determined to adequately monitor up gradient and down gradient areas of the Site in the uppermost aquifer; therefore, the report objective has been met.

https://arcadiso365.sharepoint.com/sites/AEP_US_teamsite/ARCADIS_Only/Amos/FGD Landfill CCR Reports/Well Network/2020-05-27-Final-Revised Well Network Report/Amos-CCR-FGD Landfill-Revised Well Network Report-2020-05-27.docx 1

2 BACKGROUND INFORMATION

The following section provides background information for the AEP Amos Generating Plant FGD landfill that was used to support the groundwater monitoring well network evaluation.

Facility Location Description

The AEP Amos Generating Plant is located in Putnam County, bounded by State Route 817 (Old U.S. Route 35) to the west and the Kanawha River to the east. The FGD Landfill is located approximately 2 miles northwest of the Plant and approximately three-quarters of a mile west of Winfield Road (WV 817) (**Figures 1** and **2**). The CCR Unit occupies approximately 258 total acres, located in an isolated area, with surrounding land use predominantly residential or undeveloped, with some agriculture (**Figure 3**).

Description of FGD Landfill CCR Unit

The following section will discuss the landfill configuration, area, volume, construction and operational history, and surface water control associated with the FGD Landfill.

Landfill Configuration

The landfill consists of a northern and southern valley surrounded on all sides by ridges with the northern and southern valleys separated by a topographic high point. The surface of the waste is designed to be covered with a minimum of 6-inches of soil overlying CCR, a 50-mil High Density Polyethylene (HDPE) Integrated Drainage System (IDS) geomembrane or equivalent, and covered with at least 18-inches of protective and vegetative cover soil (in the upper 6-inches of the protective cover) and vegetated with grass cover as closure construction at each landfill area is completed. Currently, final cover has been placed on the south valley cell 3 section of the landfill. General construction of the landfill final cover is further detailed in the *Design Report: Landfill Final Cover System* (GAI Consultants, Inc. [GAI] 2016).

The topography surrounding the FGD Landfill consists of steep ridges greater than 200 ft on most sides (**Figure 3**). The highest point at the Site is greater than 1,000 ft above mean sea level (amsl), while the river valley elevations range from less than 600 ft amsl (Kanawha River valley) to less than 700 ft amsl (Lick Run). The Kanawha River is located east of the FGD Landfill and ranges in elevation from approximately 565 to 583 ft amsl (United States Geological Survey [USGS] 2019).

2.2.2 Area/Volume

The total area of the Site is approximately 258 acres which includes both disposal and non-disposal use. The current permitted area for disposal is 192 acres, with a permitted waste capacity of approximately 36.7 million cubic yards (**Figure 3**).

Construction and Operational History

In March 2006, AEP submitted the *Class F Industrial Landfill Facility Application* (GAI 2006) to West Virginia Department of Environmental Protection. The application was approved and landfill activities began in April 2009. Subsequent permit modifications and renewals have been submitted and approved for the Site, most

recently in 2016 at the time of this report (GAI 2016). Landfill construction is planned for 9 individual sequences (i.e. cells), and the designed disposal rate is 2 million cubic yards per year. With a maximum design capacity of 36.7 million cubic yards, the landfill design life is approximately through the middle of year 2035 (GAI 2016). As of April 2019, the landfill is being filled within cells 1, 2 and 3 in the southern valley. Northern valley construction began in 2013 with installation of the groundwater interceptor drainage system, as well as the sedimentation and leachate ponds, and followed by the cell 4 bottom liner construction in 2018-2019.

During landfill construction, a liner is placed at the base of each cell. This liner is described in detail in the *Solid Waste/NPDES Permit Renewal Application* (GAI 2006). In general, the landfill liner consists of the following layers:

- Groundwater interceptor drainage system
- 12-inches of compacted or in-place clayey-silt subbase
- 24-inches of compacted clay liner (North Valley); 18-inches of compacted clay liner (South Valley)
- 30-mil polyvinyl chloride (PVC) geomembrane
- Leachate Collection System (LCS)
- 18-inches of protective cover (typically bottom ash, potentially West Virginia Department of Transportation mortar sand or gypsum)

The CCR byproducts from the three coal-fired generating units at the Plant (Unit 1 through Unit 3) are placed in the landfill. These waste products include fly ash, bottom ash, FGD (synthetic gypsum), and FGD purge stream treatment solids (limestone inert solids). Fly ash and bottom ash are trucked from the Amos Plant to the landfill active cell area. FGD is sluiced from the Amos Plant to the Chloride Purge Stream (CPS) WWTP directly adjacent to the Landfill via pipelines. FGD products are dried and caked at this facility before being trucked to the landfill for disposal. Fly ash and bottom ash are trucked directly from the Amos Plant to the landfill via a private haul road for direct disposal. The landfill was also permitted to receive CCR byproducts from the AEP Plants at Big Sandy, Clinch River, Conesville, Gavin, Glen Lyn, Mitchell, Mountaineer, Muskingum River, Sporn, Tanners Creek, and Kanawha River (GAI 2006; GAI 2016).

2.2.4 Surface Water Control

Surface water control at the CCR Unit is discussed in detail in *Class F Industrial Landfill Facility Application* (GAI 2006) and consists of surface runoff and infiltration of surface runoff. Surface runoff is managed through a series of collection channels, sediment traps, and pipe culverts that channel flow to 4 sediment collection ponds around the perimeter of the site. Leachate and surface flow in active landfill areas are directed to the leachate pond at the mouth of the southern or northern valley, respective to the active portion of the landfill containing the contact water. This is accomplished with vertical chimney drains that divert water to the LCS component of the landfill liner, which is a geo-composite drainage net consisting of a highdensity polyethylene geo-net with needle-punched nonwoven geotextiles heat-bonded to its upper and lower surfaces draining to a network of perforated PVC pipes. The LCS channels leachate and surface flow in active landfilling areas to the leachate ponds (GAI 2006). Sedimentation ponds are located in the northwest, southwest, and southeast portions of the landfill. A sedimentation pond is located along the eastern side of the landfill near the divide between the north and south valleys.

2.3 Previous Investigations

Prior to submission of the *Class F Industrial Landfill Facility Application* in March 2006, GAI Consultants, Inc., in coordination with AEP, performed a site investigation to characterize the conditions at the proposed landfill facility. These investigations included drilling through soil and into rock, split barrel soil sampling and standard penetration testing, undisturbed soil sampling (Shelby tubes), continuous rock coring (where appropriate), and pump or packer testing of select rock units (GAI 2006).

Soil samples were analyzed for geotechnical parameters to assist with general site characterization and stability analyses. These parameters include grain size distribution, Atterberg limits, specific gravity, moisture content, compaction, permeability, cation exchange capacity, and X-Ray Diffraction characteristics. Additionally, soil samples were analyzed for physical properties at a proposed onsite borrow site for liner quality determination (GAI 2006).

During the site investigation, piezometers were installed in 23 of 25 soil borings advanced in the projected landfill footprint. Ten 2-inch PVC monitoring wells were also installed, generally around the perimeter of the proposed extent of fill. Groundwater samples were collected from monitoring wells in an effort to characterize background water quality.

Since 2016, background and detection groundwater monitoring has been performed in accordance with 40 CFR 257.90 through 40 CFR 257.94. This monitoring includes statistical evaluation of concentrations of Appendix III and Appendix IV parameters as defined in 40 CFR 257. Analysis of groundwater chemistry data has been successful in demonstrating alternate sources. Specifically, two alternate source demonstrations (ASDs) have been completed for observed statistically significant increases (SSIs) in Appendix III parameters (AEP 2019):

- November 2017/January 2018 monitoring events: Boron (MW-2), Chloride (MW-5), and Fluoride (MW-2 and MW-4)
- May/June 2018 monitoring events: Boron (MW-2 and MW-5), and Chloride (MW-5)

These ASDs suggested that concentration trends may be the result of Type IV (natural variability) and/or Type V (alternative source) causes. In particular, it was noted that construction activities and/or road salting may represent an anthropogenic Type V factor contributing to concentration variability in several wells at the Site. Furthermore, the ASD indicated groundwater types can be divided into two groups, with MW-2, MW-4, and MW-10 exhibiting a tight sodium-carbonate cluster, and the remaining wells (MW-1, MW-5, MW-6, MW-7R, MW-8, and MW-9) falling outside of this range (AEP 2019). Down gradient wells within the uppermost aquifer (MW-2 and MW-4) that fall within a differing groundwater type than shallow perched zone wells (MW-1 and MW-5) is evidence of separation of these two zones.

In 2018, Arcadis completed site investigation activities including high-resolution water level monitoring, hydraulic testing, and well installation. Pressure transducers were installed in seven monitoring wells (MW-1, MW-2, MW-4, MW-5, MW-8, MW-9, and MW-10) to collect continuous water level data from May through August 2018 in order to better characterize hydrogeologic conditions. Monitoring well installation was designed to augment the CCR monitoring well network at the Site with two additional down gradient wells installed in the stress relief fracture system. Boreholes were continuously logged and advanced to depths ranging from approximately 105 ft below ground surface (bgs) to 115 ft bgs at MW-1801 (south valley) and MW-1802 (north valley), respectively. After completion of the boreholes, straddle packer tests were

completed to quantify hydraulic parameters and to assist in final placement of well screen intervals. Well yield testing was completed at the new monitoring wells to further quantify aquifer parameters. A complete description of well installation field methodology is provided in **Appendix A**. Results of hydraulic testing and water level monitoring are discussed in Section 3.1.3 of this report.

2.4 Hydrogeologic Setting

The geologic setting surrounding the Site consists of ridges formed by the Pennsylvanian age Monongahela and Conemaugh Formations. The Monongahela and Conemaugh Formations consist of sandstones, shales, limestones, and coal. These rocks have been fractured in response to a decline in stress and erosion. This decline in stress expands the rock and a system of fractures form throughout the bedrock over time. This process, which is characteristic of Appalachian valleys, is called stress relief fracturing (SRF) and is more prevalent in shallow bedrock (USGS 1981, 2000). Groundwater is present at the Site within these fracture systems (secondary porosity), while groundwater within primary porosity components (i.e., pore spaces) is less significant. A generalized cross section illustrating the features of an Appalachian SRF system is provided on **Figure 4**. Fractures observed at the Site in the SRF system are nearly vertical with attitude angles ranging from 75˚ to near 90˚. These fractures occur in sets that are oriented roughly parallel and perpendicular to one another, but not necessarily to the valley walls. Borings installed in both the south valley and north valley have moderate to highly fractured bedrock at depths greater than 100 ft below ground surface (bgs). Bedrock groundwater flow generally follows surface topography and is generally downslope of the ridge towards the valley floors. The SRF is known to be regionally prevalent and is considered the regional uppermost aquifer system outside of primary unconsolidated fluvial valleys (e.g. Kanawha River Valley and Teays Valley) surrounding the Site.

Unconsolidated deposits on top of the bedrock consist primarily of weathered bedrock and residuum, with some colluvial/alluvial deposits consisting of weathered rock, sand, silt, and clay. In valley bottoms, the unconsolidated sediments can be saturated with localized areas of shallow perched groundwater at the soil-rock interface. These localized areas of shallow groundwater generally flow down-valley and have limited connection with the SRF system. This is further discussed in Section 3.1.3.4.

These features are further illustrated on three lines of cross section through the FGD Landfill. Two lines trend from southwest to northeast through the south valley (A-A') and north valley (B-B'). The other line trends from northwest to southeast through both the north and south valleys. A cross section location map is provided on **Figure 5**. Cross sections A-A', B-B', and C-C' are provided on **Figures 6A**, **6B**, and **6C**, respectively. Detailed boring logs and well construction diagrams are included in **Appendix B**.

Climate and Water Budget

The climate of Winfield, West Virginia is characterized as humid continental with an average rainfall of approximately 40 inches annually. The average maximum temperature is 66 degrees Fahrenheit and the average minimum temperature is 44 degrees Fahrenheit based on information from Southeast Regional Climate Center (SERCC 2017).

The results of a numerical water budget analysis performed as part of the March 2006 *Class F Industrial Landfill Facility Application* is described in detail in Appendix I of that application (GAI 2006). The primary objective of the analysis was to estimate the average annual leachate production and estimate the

maximum leachate head within the landfill liner system. Using site-specific climate, slope, and soil characteristics, it was determined that maximum average daily heads, maximum daily peak heads, and average annual leachate heads were all within acceptable ranges (GAI 2006).

2.4.2 Regional and Local Geologic Setting

2.4.2.1 Unconsolidated

The Site is located in the Appalachian Plateau physiographic province, and unconsolidated soils are limited in extent and are residual and colluvial in origin. Soils in lower topographic areas (i.e. valleys) consist of sand, silt, or clay with increasing rock fragments with depth (colluvium), and grade to weathered bedrock (residuum) with depth. Further up the ridges, soils are composed mainly of residuum. Unconsolidated material is thickest in the valley floors, and average soil thickness is approximately 11 ft (GAI 2006).

2.4.2.2 Bedrock

The primary regional bedrock units encountered are Pennsylvanian age sedimentary rocks of the Monongahela Formation and Conemaugh Formation, in descending order from youngest to oldest. The depositional environment for these formations is characterized by a gradually subsiding shallow sea with alternating marine and freshwater strata. The sedimentary package associated with the Monongahela and Conemaugh Formations consists of alternating shale and sandstone units, with occasional thin limestone and coal beds. Several coal horizons are present in the region and often serve as marker beds for unit identification. The principal marker bed in the region is the Pittsburg Coal (i.e. No. 8 Coal), which marks the transition from the Monongahela and Conemaugh Formations. However, the Pittsburg Coal is not represented in Site borings (GAI 2006). The Pittsburgh Limestone has been identified in two borings at the nearby FAP, MW-3 and 2008-26, and is used to mark the local Monongahela-Conemaugh transition. Additionally, the Little Clarksburg Coal has been identified at FAP boring B-0608 and is used to mark the base of the Connellsville sandstone deposition (Latimer, W.J., et al. 1911).

The Monongahela Formation is found capping the hills surrounding the Site. It consists of claystones and sandstones, and to a lesser extent silt shales and siltstones, which have varying degrees of thickness laterally, making correlation difficult (GAI 2006). Stratigraphy and landfill construction details are illustrated on cross sections A-A' (south valley-southwest to northeast), B-B' (north valley-southwest to northeast), and C-C' (north and south valleys-northwest to southeast) (**Figures 6A**, **6B**, and **6C**, respectively).

Interpretations regarding shallow geologic structures are based on mapping of the Pittsburg Coal. The Parkersburg Syncline and the Byrnside Anticline appears to dip to the north-northwest through the site. Bedding planes at the site have a strike to the east-northeast and dip to the north-northwest at approximately 20 ft per mile (GAI 2006).

Deeper bedrock units produce oil and gas. Six (6) active oil and gas wells are located in the vicinity of the FGD Landfill along with former wells that were located within the landfill footprint (079-00611 and 079- 00722) that were closed in 2007 and 2006, respectively. The location of these wells is shown on **Figure 3**. Available information on the closure is provided in **Appendix B**.

Surface Water and Surface Water Groundwater Interactions

There are intermittent streams in both the northern and southern area of the Site, Lick Run, and Little Hurricane Creek (**Figure 3**). Groundwater flows following topographic relief and is generally in the direction of each of these creeks. However, sedimentation, leachate, and stormwater ponds have been constructed around the perimeter of the landfill. The design specifications of these ponds are described in detail in the Class F Industrial Landfill Facility Application (GAI 2006). Groundwater flow, as well as surface water runoff that contacts active landfill areas, is directed to the leachate ponds via the Leachate Collection System component of the landfill liner. Non-contact runoff that contacts covered landfill areas, disturbed borrow areas, or undisturbed areas is contained in the sediment collection ponds which ultimately discharge to either Little Hurricane Creek or Lick Run via principal or emergency spillways (GAI 2006).

2.4.4 Water Users

There are no active groundwater production wells at the Site or within a half-mile radius of the site, based on available information. In 2017, a water well inventory for the Amos Plant indicated no information regarding the use of wells located in the vicinity of the Site was available (Banks Environmental Data, Inc., 2017). The report identified one well registered with the United States Geological Survey within a half-mile of the Site. This well is located approximately 1,700 ft west of the FGD Landfill north valley, on the west side of Lick Run, and appears to be used for groundwater monitoring (**Appendix C**).

There is at least one confirmed private water well located within 0.5 miles of the FGD Landfill. This private well is located east of the Site at 6881 Winfield Road but is not in use because the residence is connected to public water supply.

Public water wells within 0.5 mile of the Site are unlikely. Land use is comprised of residential or undeveloped properties, with some agriculture and industry. Most, if not all, developed parcels in the vicinity of the Site are connected to Putnam Public Service District public water supply. The Putnam Public Service District source water is from the Poplar Fork Creek water shed located over 4 miles to the northwest of the Site. The water is pumped to a reservoir and subsequently treated at the water treatment plant before being distributed to public users (Putnam Public Service District 2017). Additional potable water in the area is supplied by West Virginia American Water, which operates several water systems that pull water from the Elk River, a tributary to the Kanawha River (West Virginia American Water 2015). The Lower Kanawha River is not used as a source for potable water.

https://arcadiso365.sharepoint.com/sites/AEP_US_teamsite/ARCADIS_Only/Amos/FGD Landfill CCR Reports/Well Network/2020-05-27-Final-Revised Well Network Report/Amos-CCR-FGD Landfill-Revised Well Network Report-2020-05-27.docx 7

MONITORING WELL NETWORK EVALUATION

An initial evaluation of the monitoring well network present at the Site was performed in November 2015 to determine if any of the wells were viable for continued use as part of the federal CCR Rule groundwater quality monitoring well network or retained for the purpose of water level measurement as part of a larger groundwater hydraulic monitoring well network. As part of this review, hydrogeologic conditions were evaluated to determine if the defined uppermost aquifer unit had an adequate monitoring well network. The evaluation was completed in accordance with 40 CFR 257.91 to have an established monitoring well network that effectively monitors the uppermost aquifer up gradient and down gradient of the Site. Following the initial evaluation, the network was augmented to include existing piezometers for the purpose of hydraulic monitoring. Additionally, existing wells MW-1 and MW-5 were removed from the groundwater quality monitoring well network and retained only for hydraulic monitoring. As a result, two new monitoring wells were installed in the uppermost aquifer down gradient of the FGD Landfill. Background groundwater quality is monitored at the wells that are hydraulically up gradient from the FGD Landfill. Down gradient wells are placed down gradient of the CCR unit boundary to monitor water quality.

Hydrostratigraphic Units

3.1.1 Horizontal and Vertical Position Relative to CCR Unit

The uppermost aquifer is the first encountered aquifer that is horizontally continuous across the site. The uppermost aquifer at the Site is defined by the saturated portion of the SRF system, is independent of lithologic unit, and was examined to confirm hydraulic connection from ridge to valley using multiple lines of evidence that are discussed in Section 3.2.3. Stress relief fractures occur in both the Conemaugh and Monongahela Formations. Moderate to highly fractured bedrock was observed from the bedrock surface to depths greater than 100 ft bgs at wells MW-1801 and MW-1802, immediately west of the FGD Landfill in the south and north valleys, respectively. Stress relief fractures are also present along open horizontal bedding planes. In similar stress relief fracture systems, the aquifers are generally unconfined but water levels in wells can exhibit confined behavior in valley floors if low-transmissivity sediments (i.e. clay) are present (USGS 1981). The uppermost aquifer (i.e. saturated portion of the SRF system) is horizontally continuous across the entire site.

The upper limit of the uppermost aquifer is defined by the top of the potentiometric surface in the SRF system, generally located beneath the original bedrock surface prior to landfill construction. The potentiometric surface occurs at depths as shallow as 1 ft below the soil-rock interface (beneath valley walls) to greater than 90 ft below the soil-rock interface (beneath ridgetops, e.g. MW-10). This is illustrated on cross sections A to A', B to B', and C-C' (**Figures 6A**, **6B**, and **6C**), as well as depth to water measurements summarized on **Table 1**.

There are localized areas of shallow perched groundwater at the soil-rock interface. These are limited in valley bottoms and have limited connection with the underlying SRF system. Monitoring wells MW-1 (southern valley), and MW-5 (northern valley) are screened in these shallow perched zones. These zones are not considered the uppermost aquifer as they are limited in extent and discontinuous. Within the limits of the landfill, underdrains located at various depths beneath the landfill liner prevent an intermittent,

recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevation (GAI 2006).

Overall Flow Conditions

Groundwater flow at the Site occurs within the SRF system (i.e. uppermost aquifer), mainly moving along hydraulically connected fractures and other secondary porosity features. Groundwater within primary porosity components (i.e., pore spaces) is less significant. Fractures in this system are hydraulically connected via open bedding planes, and groundwater flow directions generally follow topography from ridges towards the valley floor and out the northern and southern valley mouths. Local areas of shallow perched groundwater in the valley flows horizontally along the soil-rock interface. As discussed in Section 3.1.3.4, vertical flow of perched groundwater is limited. Available groundwater elevations are summarized on **Table 1** for July 2005, November 2010, and January 2019 well gauging events. Potentiometric contours from the November 2010 event, which is the most recently available data that includes groundwater elevations beneath the landfilled material (e.g. MW-3R, 0512, 0513), are depicted on **Figure 7**. Groundwater levels and flow directions from the most recent gauging events, including levels from MW-1801 and MW-1802, are consistent with historical data.

3.1.3 Hydraulic Conductivity

The following subsection describes field implementation and data analysis of hydraulic testing conducted at the FGD Landfill (e.g., borehole packer tests, well yield tests). Historical hydraulic tests are briefly described and referenced. Hydraulic conductivity estimates derived from 2018 investigations are consistent with historical estimates and discussed in more detail below.

3.1.3.1 Historical Hydraulic Testing

Packer testing was completed during piezometer and well installations in 2005 in order to estimate hydraulic properties of the fractured bedrock. Additionally, slug tests were conducted at select bedrock monitoring wells. Reported hydraulic conductivity estimates from historic packer and slug tests in the SRF are provided in **Table 2** and ranged from 10^{-3} to 10^{-6} centimeters per second (cm/sec). No hydraulic testing data is available for perched groundwater in the valley floor (GAI 2006).

3.1.3.2 Packer Testing

Packer testing was conducted during installation of wells MW-1801 and MW-1802. The intent of injection packer testing is to estimate relative bedrock permeability for various borehole depth intervals to assist with water-bearing unit identification and monitoring well installation. Upon completion of each borehole, rock cuttings were flushed from the borehole with water in preparation for packer testing. Inflatable upper and lower rubber packers were then inserted to a specified 10-ft depth interval and inflated to create a seal. A riser pipe was attached to the top of the upper packer to provide a rigid, sealed standpipe with a pressure gauge at a known distance above the ground surface. Through this riser pipe, water was injected into the packer interval while measuring the gauge injection pressure, as well as injection volumes via a totalizing flowmeter. During the packer tests, flow rates and borehole pressure were monitored at regular intervals. Test data was analyzed using the method described in the U.S. Department of the Interior Ground Water Manual (1977).

Packer tests were designed to target the SRF system. Two depth intervals were tested at MW-1801 (55 to 65 and 65 to 75 ft bgs). The estimated hydraulic conductivity from 55 to 65 ft bgs was 7.9 x 10⁻⁵ cm/sec, and from 65 to 75 ft bgs was 3.2×10^{-6} cm/sec. Four depth intervals were tested at MW-1802 (48 to 58, 65 to 75, 89 to 99, and 99 to 109 ft bgs) and flow was only observed at two of those intervals. The estimated hydraulic conductivity from 48 to 58 ft bgs was 4.0×10^{-6} cm/sec, and from 89 to 99 ft bgs was 3.7×10^{-5} cm/sec. Packer test results are summarized on **Table 2** and packer testing logs are included in **Appendix D**.

3.1.3.3 Yield Testing

Well yield testing was conducted by Arcadis from August through September 2018 at wells MW-1801 and MW-1802, both of which are installed in the uppermost aquifer. Yield tests were completed by pumping each well at variable and steady state extraction rates and measuring the water level response in each well during and after pumping (recovery). Extraction rates were maintained using a submersible pump. Highresolution water level data were collected during both pumping and recovery phases via data-logging pressure transducers installed in each test well. Representative portions of recovery data were selected for analysis and analyzed using AQTESOLV® for Windows® Version 4.50 (Duffield 2007). Hydraulic parameter values were determined using the Theis analytical solution based on the observed response for a single (partially-penetrating) well. Drawdown data was corrected for unconfined conditions using an appropriate equation (Kruseman and DeRidder 1990).

The estimated hydraulic conductivity values at MW-1801 and MW-1802 were 2.5 x 10⁻⁶ and 1.2 x 10⁻⁵ cm/sec, respectively. A summary of yield testing results is provided on **Table 2** and solution reports with individual curve matches are provided in **Appendix D**.

3.1.3.4 High Resolution Water Level Monitoring

Continuous water level data in the SRF and shallow alluvial zone was collected in May through August 2018 in order to better characterize hydrogeologic conditions at the FGD Landfill. Resulting hydrographs from this data collection is presented in **Appendix D**.

Pressure transducers were installed at seven hydraulic monitoring locations that included three SRF monitoring wells located up gradient on ridges in the north valley (MW-8, MW-9 and MW-10), two down gradient SRF monitoring wells with one in the south valley (MW-2) and north valley (MW-4), and two down gradient shallow alluvium monitoring wells with one in the south valley (MW-1) and one north valley (MW-5).

The following external hydraulic influences were observed at the FGD Landfill during the monitoring period: precipitation events, barometric pressure fluctuations, and responses to groundwater sampling. Waterlevels were post-processed that included barometric compensation, shift correction, water-level elevation, and barometric correction. Barometric efficiency was estimated for each monitoring well and varied from 0.05 to 0.2 and indicates a level of confinement for the SRF. In the north valley, shallow alluvium well MW-5 did not have a barometric effect reflecting unconfined shallow water table conditions. Shallow alluvium well MW-1 did have a barometric effect with a resulting barometric efficiency of 0.2, which is likely due to shallower finer grained material in the vadose zone compare to coarser deposits observed at MW-5. Additionally, the observed water level elevations confirm a vertical sequence separating the shallow alluvium and SRF indicating a level of hydraulic separation of the two zones (e.g. MW-1, MW-2 [south valley

Figures D-2 and **D-3**] and MW-4, MW-5 [north valley **Figures D-4** and **D-5**]). Vertical separation is evident at each of these two well pairs because the water level elevations in wells screened in the shallow alluvium (i.e., MW-1 and MW-5) are approximately 15 to 30 ft higher than at adjacent wells screened in the SRF (i.e., MW-2 and MW-4).

Several of the monitoring wells responded to precipitation events resulting in water level increases including MW-2, MW-4, MW-5 as well as MW-9, to a lesser extent. Sudden declines followed by recovery in water levels due to groundwater sampling were also observed in wells MW-5, MW-8, MW-9, and MW-10. Following groundwater sampling events and an anomalous decrease at MW-1, several wells showed a more rapid recharge such as MW-5, MW-8, and MW-9 (see **Figure D-7**) while other wells took several days or weeks to return to pre-pumping levels such as MW-10 (see **Figure D-8**). The more rapid recharge response is reflective of a higher permeability of the materials at the respective locations.

Uppermost Aquifer

CCR Rule Definition

Per 40 CFR 257.60(a), new CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must be constructed with a base that is located no less than 1.52 meters (5 ft) above the upper limit of the uppermost aquifer, or must demonstrate that there will not be an intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high conditions).

The CCR rule definitions for an aquifer and the uppermost aquifer as specified in 40 CFR 257.53 indicates an aquifer is a geologic formation capable of yielding usable quantities of groundwater to wells or springs while an uppermost aquifer is defined as the geologic formation nearest the natural ground surface that is an aquifer, as well as lower aquifers, that are hydraulically interconnected with this aquifer within the facility's property boundary. Upper limit is measured at a point nearest to the natural groundwater surface to which the aquifer rises during the wet season.

3.2.1.1 Common Definitions

An aquifer is commonly defined as a geologic unit that stores and transmits water (readily or at sufficient flow rates) to supply wells and springs (USGS 2015; Fetter 2001). The uppermost aquifer is considered the first encountered aquifer nearest to the CCR unit.

Identified Onsite Hydrostratigraphic Unit

The identified Site hydrostratigraphic unit is the saturated portion of the SRF system, which is considered the uppermost aquifer at the Site. The SRF is known to be regionally prevalent and is considered the regional uppermost aquifer system outside of primary unconsolidated fluvial valleys. The uppermost aquifer is not known to be used locally for groundwater supply or industrial water use.

Hydraulic Connection – Multiple Lines of Physical Evidence Approach

A multiple lines of evidence approach was used to understand the hydraulics related to horizontal and vertical groundwater flow at the Site. The main purpose for this demonstration was to help understand the dynamics and vertical connectivity of the SRF system, both from ridges to valleys, as well as perched groundwater in valleys to deeper bedrock fractures.

At the Site, the SRF system is determined to be the uppermost aquifer based on spatial occurrence and hydraulic testing. The following lines of physical evidence support the understanding that the SRF system is connected from the ridgetops down to the valleys and the shallow perched zones are hydraulically disconnected.

The physical lines of evidence that verify SRF hydraulics are:

- SRF occurring independent of bedrock units at depths greater than 100 feet (MW-1801 and MW-1802)
- Shallow shales are fractured on ridges according to boring logs
- Hydrographs indicate vertical separation from the local areas of shallow perched groundwater and deeper groundwater within the SRF system
- ASD evaluation concluded that there is a geochemical distinction between shallow perched groundwater wells MW-1 and MW-5 relative to other wells screened in the SRF system down gradient of the FGD Landfill at MW-2 and MW-4.

Based on this information and the positive correlation of these lines of evidence with the Appalachian conceptual site model for groundwater flow (USGS 1981), the SRF system is hydraulically connected from ridges to valleys. A generalized cross section illustrating the features of an Appalachian SRF system is provided on **Figure 4**.

Review of Existing Monitoring Well Network

Overview

The Site was visited by Arcadis and AEP personnel on August 11, 2015 to review existing well network conditions and locations. At that time, the monitoring well network was initially determined sufficient (Arcadis 2016). Since 2016, additional analyses discussed above in this report have resulted in a refined understanding of the uppermost aquifer and provided support for removal of shallow perched zone wells MW-1 and MW-5 from the federal well network. These wells were replaced with two deeper down gradient wells screened in the uppermost aquifer (i.e., SRF). A well construction table that summarizes the location, ground surface elevation, borehole depth, installation date, and associated well construction details of the monitoring well network is included as **Table 3**. As presented in **Table 3**, wells included in the monitoring network have been designated as up gradient or down gradient. Additionally, some monitoring wells and piezometers are designated for hydraulic monitoring only. The wells that are shaded on **Table 1** and **3** and **Figure 3** were abandoned. Available closure information is provided in **Appendix B** from the West Virginia Department of Environmental Protection (WVDEP). No closure information was available for monitoring wells MW-3 and MW-3RA and piezometers 0503, 0504, 0507 and 0514. These monitoring wells and

piezometers are assumed to have been closed following WVDEP guidelines. Further details are provided in Section 4.1.

Spatially, the monitoring well network as illustrated on **Figure 8** is distributed around the entire Site and sufficiently monitors up gradient and down gradient locations as specified in 40 CFR 257.91. The well screen intervals are located in the SRF system and include both the Monongahela and Conemaugh Formations.

Gaps in Monitoring Network

As discussed in Section 3.3.1 of this report, gaps in the monitoring network were not identified upon initial Arcadis review in 2016. Upon additional data collection, modifications were made to the federal monitoring well network to add MW-1801 and MW-1802 as replacements for MW-1 and MW-5, respectively and as described previously in this report**.** Based on these modifications, there are no gaps in the monitoring network. The recommended monitoring well network is described in Section 4.

RECOMMENDED MONITORING NETWORK

The network meets specifications stated in 40 CFR 257.91. Recommended groundwater monitoring objectives utilizing existing wells are further discussed and will provide an adequate understanding of seasonal and temporal fluctuations in groundwater quality, hydraulics, and groundwater flow at the Site.

Monitoring Well Network Distribution

The groundwater quality monitoring network at the Site consists of 9 out of 11 wells as represented on **Table 3** and **Figure 8**. The remaining two wells at the Site (i.e., MW-1 and MW-5) will be gauged for the purpose of ongoing groundwater elevation data collection. Additionally, all available piezometers listed on **Table 3** along with the 9 groundwater water quality monitoring wells will be gauged.

4.1.1 Down Gradient Locations

Monitoring wells down gradient in the south valley (MW-2, MW-1801) and north valley (MW-4, MW-1802) constitute the down gradient groundwater quality monitoring locations (**Figure 8**).

4.1.2 Up Gradient Locations

Monitoring wells located along the western (MW-6), southern (MW-7R), eastern (MW-8), and northern (MW-9, MW-10) CCR boundary constitute the up gradient groundwater quality monitoring locations (**Figure 8**).

Well Construction

As discussed above in Section 3, gaps in the monitoring well network at the FGD Landfill were addressed by utilizing existing wells and by the installation of 2 monitoring wells in August 2018 (MW-1801, MW-1802). All new monitoring wells were constructed in general accordance with West Virginia Department of Environmental Protection Title 47 Series 60 Monitoring Well Design Standards dated June 21, 2011 by a state licensed driller.

Installation details and field methods are provided in **Appendix A**. Well construction data for the monitoring well network is summarized on **Table 3**. Boring logs and the monitoring well completion diagrams are provided in **Appendix B**.

https://arcadiso365.sharepoint.com/sites/AEP_US_teamsite/ARCADIS_Only/Amos/FGD Landfill CCR Reports/Well Network/2020-05-27-Final-Revised Well Network Report/Amos-CCR-FGD Landfill-Revised Well Network Report-2020-05-27.docx 14

FGD LANDFILL-CCR REVISED GROUNDWATER MONITORING WELL NETWORK EVALUATION

PROFESSIONAL ENGINEER'S CERTIFICATION 5

I, Todd A. Minehardt, certify that this report was prepared under my direction and supervision, and that the information contained herein is true and accurate to the best of my knowledge. Based on my experience and knowledge of the site, the proposed groundwater monitoring system will be adequate to meet the requirements of 40 CFR Part 257.91 excluding paragraphs (d) and (g), which do not apply to this groundwater monitoring well network evaluation.

TINEHARDS **ODD**

Printed Name of Registered Professional Engineer

Signature

arcadis.com

h

 $235/8$

 $27/2020$

Registration No.

Registration State

Date

REFERENCES

- AEP. 2019. Annual Groundwater Monitoring Report, Appalachian Power Company, John E. Amos Plant, Landfill CCR Management Unit, Winfield, West Virginia.
- Arcadis. 2016. FGD Landfill CCR Groundwater Monitoring Well Network Evaluation. October 5.
- Banks Environmental Data, Inc. 2017. Water Well Report, AEP Water Well Inventory, FGD Landfill, ES-124909.
- Fetter, Charles Willard, and C. W. Fetter. 2001. Applied hydrogeology. Vol. 3. No. 3. Upper Saddle River: Prentice hall.
- GAI Consultants, Inc. 2006. Class F Industrial Landfill Facility Application, John E. Amos Landfill, John E. Amos Plant, Winfield, West Virginia, GAI Project Number: C040384.40.
- GAI Consultants, Inc. 2016. Design Report: Landfill Final Cover System, John E. Amos Landfill, John E. Amos Power Plant, Winfield, West Virginia
- Latimer, W.J., et al. 1911. Jackson, Mason and Putnam Counties, Volume 1, County Reports and Maps. Wheeling News Litho. Company.
- Putnam Public Service District. 2017. 2017 Water Quality Report. http://www.putnampsd.com/ccr.pdf
- Southeast Regional Climate Center. 2017. Historical Climate Summaries, Winfield Locks, West Virginia, http://www.sercc.com, Query conducted by Mr. Josh Roberts of Arcadis on May 10, 2017.
- U.S. Department of the Interior. 1977. Groundwater Manual. Bureau of Reclamation. Supt. of Documents, U.S. Govt. Printing Office, Washington, D.C.
- USGS. 1981. Water-Supply Paper 2177, Hydrologic Effects of Stress-Relief Fracturing in an Appalachian Valley.
- USGS. 2001. Aquifer Characteristics Data for West Virginia, Water Resources Investigation Report 01- 4036.
- USGS, Aquifers and Groundwater. 2015. Available online at www.usgs.gov.
- USGS. 2019. USGS Water Data for the Nation. USGS 03198000 Kanawha River at Charleston, WV. https://waterdata.usgs.gov/usa/nwis/uv?03198000. Data range: January 2016 to May 2019. Query conducted by Mr. Josh Roberts of Arcadis on May 15, 2019.

TABLES

NOTES:
Shaded = well not werfled or closed
Braded = well note above mean sea level.
a = Source: AEP DWG. No. 13-30500-12-E
amal = above mean sea level
amal = above mean sea level
Elev = elevation
Elev = elevation
CW = grou

Table 2 Summary of Hydraulic Testing Results AEP Amos Generating Plant - FGD Landfill Winfield, West Virginia

Geometric Mean 0.4 3.8E-02 1.4E-05

NOTES:

¹ Packer testing analysis analyzed using U.S. Department of the Interior, Bureau of Reclamation, 1977. Ground Water Manual, A Water Resources Technical Publication, pp. 258-264

 2 Recovery results only using Theis solution; correction of drawdown data applied for unconfined conditions (s'=s-s 2 /2b; where s is drawdown and b is aquifer thickness)

Kruseman, G.P. and Ridder, N.A., 1990. Analysis and evaluation of pumping test data. Analysis and evaluation of pumping test data., (47)

Theis, C.V., 1935. The relation between the lowering of the piezometric surface and the rate and duration of discharge of a well using groundwater storage, Am. Geophys. Union Trans., vol. 16, pp. 519-524

Birsoy, Y.K. and W.K. Summers, 1980. Determination of aquifer parameters from step tests and intermittent pumping, Ground Water, vol. 18, no. 2, pp. 137-146

³ Slug testing results from GAI Consultants, Inc. 2006. Class F Industrial Landfill Facility Application, John E. Amos Landfill, John E. Amos Plant, Winfield, West Virginia, GAI Project Number: C040384.40

 4 Water level and total depth taken from data from individual respective test data

N/A = not available

-- = not applicable

T = transmissivity

 $K =$ hydraulic conductivity

ft = feet

gpm = gallons per minute

psi = pounds per square inch

cm/sec = centimeters per second

bgs = below ground surface

Table 3 Well Construction Details AEP Amos Generating Plant - FGD Landfill Winfield, West Virginia

NOTES:

Shaded = well not verified or closed

Elevation in feet above mean sea level

a = 1983 West Virginia State Planar Coordinates

b = Source: GAI Consultants. March 2006. Class F Industrial Landfill Facility Application, John E. Amos Landfill, Volume 1, Appendix K - Monitor Well Construction Diagrams.

c = Survey data and boring log not available, coordinates estimated based on AEP DWG. No. 13-30500-11-E.

J = Well was re-surveyed in September 2019. Ground surface was loweredto access stockpiled soil, and subsequently well casing was removed. Top of casing elevation changed from 947.01 to 937.68 at MW-8, and 947.35 to 937.68

amsl = above mean sea level

bls = Below land surface

ft = feet

NA = not applicable

FIGURES

City: CITRIX Div/Group: IM/DV Created By: K.Ives Last Saved By: akens

2019 7:01:39 AM

Z:\GISProjects_ENV\AEP\Amos\mxd\Landfill Report\Sept2018\F2_AmosRegionalMap.mxd 7/10/2019 7:01:39 AM City: CITRIX_Div/Group: IM/DV_Created By: K.Ives
OH015976.0009.00001 (Mountaineer Ash Pond)
Z:\GISProjects_ENVAEP\Amos\mxd\Landfill Repor OH015976.0009.00001 (Mountaineer Ash Pond)

Feet **FIGURE ARCADIS FIGURE**

Streamflow Direction

C:IBIMOneDrve - ARCADISIBIM 360 DocsAMERICAN ELECTRIC POWERVAEP Amos FGD LANDFILL2019WV015976.004/UND7604/LANDFILL-CS Avg LAYOUT: CS A-A SAVED: 5/23/2019 11:14 AM ACADVER: 23.0S (LMS TECH) PAGESETUP: --- PLOTSTYLETABLE: AC CITY:(COLUMBUS, OHIO) DIV/GROUP:(IM/DV) DB:(R. SMITH) LD:(Opt) PIC:(Opt) PM:(T. FORTNER) TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
C:\BIM\OneDrive - ARCADIS\BIM 360 Docs\AMERICAN ELECTRIC POWER\AEP Amos FGD LANDFILL\2019\WV015976.0 ぞに 一 φΖ PLOTTED: 5/24/2019 8:16 AM BY: SMITH, BOB

C:BMMOneDiwe-ARCANIELECTRIC POWERAEP Amos FGD LANDFILL2030WV016976.04VL/USDFILL403.dwg LANDFILL403.dwg LANDFILL403.09 (11/44 MM ACADVER: 23.05 (LMS TECH) PAGESETUP: --- PLOTSTYLETABLE: ACAD/CTB CITY:(COLUMBUS, OHIO) DIV/GROUP:(IM/DV) DB:(R. SMITH) LD:(Opt) PIC:(Opt) PM:(T. FORTNER) TM:(Opt) LYR:(Opt)ON=*;OFF=*REF* LL-VPH) **DRIVE SIMILITY**
COLLECTRIC PLOTTED: 5/24/2019 8:13 AM BY: SMITH, BOB

City: CITRIX Div/Group: IM/DV Created By: K.Ives Last Saved By: webb Last ae. City: CITRIX_Div(Group: IM/DV_Created By: K.I.
OH015976.0009.00001 (Mountaineer Ash Pond)
Z:\GISProjects_ENV\AEP\Amos\mxd\Landfill Re OH015976.0009.00001 (Mountaineer Ash Pond)

Field Methodology

APPENDIX A

FIELD METHODOLOGY

Based on the recommended well network modifications, the following generalized tasks were completed:

- Installation of 2 bedrock borings at the FGD Landfill
- Installation and development of 2 new monitoring wells at the FGD Landfill

Arcadis provided oversight for drilling and installation of 2 bedrock monitoring wells by an AEP-licensed drilling crew. Implementation of the field activities began with the initial utility clearance activities beginning July 2018. Drilling, packer testing, well installation, and well development operations began on August 7, 2018 and ended on August 22, 2018. Well yield testing was completed on September 11 and 12, 2018.

Utilities Clearance

AEP completed a plant dig permit, which identified private plant utilities near the new monitoring well and borings locations. Arcadis retained the services of a utility locating subcontractor (The Underground Detective) to perform a geophysical survey (e.g. ground penetrating radar, electromagnetic survey, etc.) over an area of 25 feet by 25 to locate utilities at each new monitoring well location. The private utility locator also used an air knife/soil vacuum extraction system to pre-dig the proposed borehole locations to a diameter at least 10 percent larger than the largest diameter tooling to be used during drilling and to a depth of 8 feet below the ground surface (bgs) or to bedrock, whichever was encountered first.

Decontamination

All down-hole tools or equipment were decontaminated in accordance with ASTM D5088 prior to the start of drilling and between each borehole location. At a minimum, the tooling was washed with detergent solution followed by a potable water rinse. The use of a pressure washer was used when possible. Containerization was not required for decontamination water because all work was completed outside of the FGD Landfill area and not considered contaminated. Water for decontamination or drilling was potable and obtained from the AEP Amos Plant.

Borehole Advancement and Stratigraphy/Lithology

Bedrock boreholes began by using standard hollow-stem auger methods with a minimum 8.25" inner diameter auger in accordance with ASTM D5784 until the soil-rock interface was encountered. Continuous spit-spoon sampling and standard penetration testing was performed in accordance with ASTM D1586 until bedrock was encountered. A minimum 6-inch diameter PVC surface casing was temporarily set 2 feet into the competent bedrock prior to beginning rock coring. Bentonite chips were placed in the annulus between the borehole and the surface casing to ground surface, serving as a temporary seal around the surface casing during drilling operations. The chips were placed in a controlled manner to prevent contamination of the well. Chips were hydrated periodically during placement. The bentonite annulus seal was allowed to
set for approximately 12 hours (overnight) before continuing with rock coring. The 6-inch PVC casing was removed upon installation of the permanent well casing.

Rock core samples were completed with NQ sized wireline system in accordance with ASTM D 2113-93. Upon completion of coring, the bore holes were enlarged to 6" diameter using rotary drilling methods in accordance with ASTM D 5783-95.

Arcadis logged all geologic samples collected during the drilling process for bedrock monitoring wells. Field logging of the soil and rock samples were performed in accordance with ASTM D5434-12. Unconsolidated soils were classified under the Unified Soil Classification System (USCS), while rock core logging was classified in accordance with the *Midwest Geosciences Group; Field Guide for Rock Core Logging and Fracture Analysis*. Boring logs and well construction details for all installations completed during this scope of work are provided in **Appendix B**. No unconsolidated soil samples were collected. Rock coring was completed continuously using a NQ wireline system that retrieved a 2-inch diameter core to the termination depth. The borehole was flushed to remove any remaining drilling debris.

Packer Testing

Single-straddle packer tests were conducted on select intervals of the open core holes. Final determination of intervals for packer testing was determined based on review of lithologic boring logs, and consultation between Arcadis and AEP. At a minimum, straddle packer testing was completed at the anticipated depth interval corresponding to monitoring well screen depths. Upper and lower inflatable rubber packers attached to a rigid riser pipe were inserted to the specified test interval. Once at the test interval, the rubber packers were inflated to create a seal. The riser pipe was fitted with a pressure gauge at a known and documented distance above the ground surface, as well as a totalizing flow meter. Water was injected through the riser pipe at a constant pressure, while the Arcadis representative measured and recorded totalizing flow volume and gauge pressure at specified time intervals for a total of up to 30 minutes per each pressure. At the completion of the straddle packer test, water injection ceased and gauge pressure was monitored until it returned to pre-test conditions. Once gauge pressure stabilized, the packers were deflated and either removed from the borehole or to the next specified depth interval to repeat the straddle packer test procedure. Straddle packer test data was analyzed according to the method described in U.S. Department of the Interior, Bureau of Reclamation, 1977. Ground Water Manual, A Water Resources Technical Publication, pp. 258-264. After packer testing, the core hole was reamed to 8-inch diameter using air rotary drilling methods and water injections to remove cuttings in accordance with ASTM D 5782-95-Use of Direct Air Rotary Drilling for Geoenvironmental Exploration and the Installation of Subsurface Water Quality Monitoring Devices. The bedrock boreholes were flushed of cuttings at the completion of reaming using potable water. The final borehole depth was confirmed via tagline measurement following borehole flushing.

Monitoring Well Installation and Construction

Monitoring well installation and construction was completed in accordance with the AEP- approved work plan prepared by Arcadis. Prior to beginning work, daily health and safety meetings were held each morning, including a thorough discussion of the day's scope of work, identified hazards, hazard mitigation,

arcadis.com

https://arcadiso365.sharepoint.com/sites/AEP_US_teamsite/ARCADIS_Only/Amos/FGD Landfill CCR Reports/Well Network/Appendices/Appendix A - Field Methodology/App. A -Field Methodology.docx 2

and completion of the AEP Job Safety Analysis documentation in the presence of AEP staff. Health and safety documentation was retained by both Arcadis and AEP.

Based on the field conditions, Arcadis directed AEP regarding the total drilling and well completion depths, well construction configuration, and well materials to be used. Screened intervals for bedrock monitoring wells targeted the uppermost saturated bedrock unit. Final well depths and screened intervals are included in **Appendix B**.

All monitoring wells were constructed in general accordance with West Virginia Department of Environmental Protection Title 47 Series 60 Monitoring Well Design Standards dated June 21, 2011.

Bedrock monitoring wells were constructed of 2-inch Schedule 40 PVC risers and screens. The well was double-cased, with a 6-inch PVC surface casing installed into the upper two feet of bedrock. The surface casing was grouted in place using a bentonite grout. Well screens were constructed of 20 slot (0.020 ft screen openings) PVC. A primary filter pack of Global[®] #5 sand was placed across the screened interval to approximately 2 feet above the screen, followed by approximately 1 foot of secondary (finer gradation) filter pack composed of Global® #6 sand. Boring logs and well construction diagrams are provided in **Appendix B, Table 3** and well survey information can be seen in **Appendix C.**

Monitoring Well Development

Well development was completed at both newly-installed wells. Well development at new wells was performed a minimum of 48 hours after the completion of well construction. The static water level was measured in the well prior to initiation of development. All wells were developed through a pump and surge method in accordance with West Virginia Department of Environmental Protection Title 47 Series 60 Monitoring Well Design Standards dated June 21, 2011. The well was initially purged with a pump to remove loose material and fines from the well. Well development data are included as **Appendix D**.

Monitoring Well Yield Testing

Well yield testing was conducted by Arcadis in September 2018 at wells MW-1801 and MW-1802, both of which are installed in the uppermost aquifer. Yield tests were completed by pumping each well at variable and steady state extraction rates and measuring the water level response in each well during and after pumping (recovery). Extraction rates were maintained using a submersible pump. High-resolution water level data were collected during both pumping and recovery phases via data-logging pressure transducers installed in each test well. A summary of yield testing results is provided on **Table 2** and solution reports with individual curve matches are provided in **Appendix D.**

High Resolution Water Level Monitoring

Continuous water level data in the SRF and shallow alluvial zone were collected in May through August 2018 in order to better characterize hydrogeologic conditions and permeability within the SRF system and shallow alluvium at the FGD Landfill. Detailed information is presented in **Appendix D**.

Pressure transducers were installed at seven hydraulic monitoring locations that included three SRF monitoring wells located upgradient on ridges in the north valley (MW-8, MW-9 and MW-10), two down

arcadis.com

gradient SRF monitoring wells with one in the south valley (MW-2) and north valley (MW-4), and two down gradient shallow alluvium monitoring wells with one in the south valley (MW-1) and one north valley (MW-5). Water levels were recorded continuously during the testing period.

APPENDIX B

Boring/Well Construction Logs and Closure Information

GAI Consultants, Inc. 2006

Boring Logs

B-0501 to B-0525 & MW-1 to MW-10

N 540558.4978

boring ADVANCED WING 514" FOLIO STEM AUGERS, 4"6 CASING, M2-2 WIRELINE CORING TOOLS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

gai consultants

REMARKS**

 -30° suchensines FLACS. $54.4, 57.5, 57.5, 58.25$

 $58.75, 61.1$
BORING NO. $\frac{8-0501}{1}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 $\label{eq:3.1} \delta \mathbf{t} = \mathbf{0}$

 \mathcal{A}

 $\eta_{\rm CMB} = -\mu$

 \sim

REMARKS**

 $\sim 10^{-1}$ and $\sim 10^{-1}$ and $\sim 10^{-1}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \bar{z}

 β .

N 540563.2422 759.46 Grade El. E 1723508.0316

REMARKS - DRILLED BY TERRA TESTING INC. USING A SIMCO 4000 TD TRACK WOUNTED PULL

BORING ADVANCED USING 5143 SOLID STEM AUGERS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. B.0502

N 540843.8055

775.00 Grade El. E 1723858.5630

REMARKS .. DRILLED BY TERAR TESTING USING A SIMCO 4000 TITLACK MOUNTED DRILL AIG. BORING ADVANCED

Winds 514 SOLID STEM AUGERS NO CASING, NO. 2 WIRELINE CORING TOOLS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. 0503

gai consultants

 $(R-5)$

REMARKS**

* POCKET PENET ROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{\beta \cdot 0503}{\beta \cdot 5}$

N 540840.0544

E 1723859.8367 Grade El. 775.40

REMARKS . DRILLED BY TED LA TESTING USING A SIMCO 4000 TZ TRACK MOUNTED DRUL

BORING ADVANCED USING 514 6 SOLID STEM AUGERS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING \ddotsc

BORING NO. BOSOY

 \sim \sim

10 gal consultants

BORING ADVANCED USING 514 SOLLD STEM ALLERS, COMMUNISPT, MB-2 W.RELINE CORING TOOLS

* POCKET PENETROMETER READINGS

ge.

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $rac{B \cup 505}{(27)}$

REMARKS**

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \Box

REMARKS**

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $rac{B\ 0.505}{(27)}$

gai consultants

^V^T^{Vansforming ideas into reality}

REMARKS **

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. <u>B 0505</u>

BORING NO. $\frac{\beta - 0.505}{427}$

REMARKS**

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $B-\frac{0505}{1000}$

 ϵ

 \mathbb{Z}_+

 ϵ

 $\bar{\gamma}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING
..

 ϵ

 \sim

 $\mathcal{A}^{\mathcal{A}}$

REMARKS **

 $\bar{\nu}$

* POCKET PENETROMETER READINGS

 -1

** METHOD OF ADVANCING AND CLEANING BORING

τ

BORING NO. $\frac{\beta \cdot 0505}{250}$

 \sim \sim

 \bar{z}

N 539424.9688

E 1722518.6810 Grade El. 709.52

REMARKS .. DRILLED BY TERRA TESTING, INC. WING A SIMCO 4000 TZ TRACK MONNTED PRILL.

BORING ADVANCED MSING 54" SOLO STEM AUGENS, 4"I.D. STEEL CASING, CONTINUOUS SPT,

* POCKET PENETROMETER READINGS

- 50

BORING NO. B-0506

** METHOD OF ADVANCING AND CLEANING BORING

REMARKS**

 $-\mathfrak{f}_1$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

٠,

 \hat{A}

BORING NO. $B - 0506$

REMARKS **_

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. B.O.SOG

 $\overline{}$

N 539428.8146 Grade El. 709.99 E 1722523.7682

REMARKS " DRILLED BY TETLER TESTING USING A SIMIC YODD-TZ TARCK MONATED DRILL

BORNS REVAIRED USING 548 SOLID SOLD AVISERS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. 30507

 $\ddot{}$

REMARKS .. DRULED BY TERRA TE3TIN INC. WSING A SIMCO 4000-T2 TRACK MONNIED DRILL

BORING ADVANCED USING 514 P SOLIO STOM ANCERS CONTINUOUS 5PT, NO-2 WILLING CORING TOOLS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{\beta \cdot 0508}{(25)}$

gai consultants

REMARKS**

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 $\bar{\gamma}$

 \sim

BORING NO. $\frac{\cancel{9}-\cancel{0}\cancel{0}\cancel{0}\cancel{8}}{(\cancel{2}\cancel{0})}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \mathbb{R}^n , \mathbb{R}^n , \mathbb{R}^n \sim

 $\bar{\gamma}$

BORING NO. $3-0508$
(25)

 \cdot

 \sim .

* POCKET PENET ROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \sim

BORING NO. $\frac{3 - 0.508}{25}$

 $\bar{\epsilon}$

REMARKS**

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 $\mathcal{A}^{\mathcal{A}}$

REMARKS **

٦

 $\frac{1}{\mathbb{Q}}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{\sqrt{3}-0.508}{(2.5)}$

* POCKET PENET ROMETER READINGS

BORING NO. $\frac{\beta - 0508}{25}$

** METHOD OF ADVANCING AND CLEANING BORING

N 541748.6664 E 1724111.6219 Grade El. 824.40

REMARKS .. DRILLED BY TERAL TESTING INC. USING A SIMCO 4000 TZ TRACK MOUNTED OLILL

BORING ADVANCED USING 54 SOLID STEM AUGERS, 4" I.D. STEEL CASING, NOO-L WIRELINE WRING TOOLS.

* POCKET PENETROMETER READINGS

 $\frac{\Delta IACLINC}{BORING NO.}$ $\frac{\beta - 0SO9}{(7)}$

** METHOD OF ADVANCING AND CLEANING BORING

 \mathbb{R}^2

REMARKS **

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

Ţ

 $\mathcal{A}^{\mathcal{A}}$

BORING NO. $B-0.509$

 $\ddot{}$

REMARKS **

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

π

BORING NO. $\frac{\beta - 0.509}{(2)}$

 $\ddot{}$

gai consultants
 gains the consultants

 $\overline{}$

REMARKS**

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{B - 0.509}{(7)}$

REMARKS " DRILLED BY TERRA TESTINE, INC. WING A SIMCO 4000-T2 TAACK MOUNTED DAILL

BORING ADVANCED WING 51/4 SOLIA STEM AUGERS, 4"I.B. STEEL CASING, NOL-2 WIRELINE CORING TOOLS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{B-0.510}{(26)}$

REMARKS**

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \sim

BORING NO. $\frac{\beta - \partial \zeta / \partial}{2 \omega}$

 $\ddot{}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\sqrt{2-\frac{0.5}{0}}$

gai consultants

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{\beta - 0510}{(20)}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 $\boldsymbol{\cdot}$

BORING NO. $rac{B \cdot OS}{C}$

gai consultants

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{B - 0510}{(26)}$

gai consultants

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{B-0510}{126}$

 \cdot

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $B - 0510$ (26)

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{P_3 - 05}{(26)}$

N 541746.9425 824.57 Grade El. E 1724116.3536

REMARKS . DRILLED BY TERRATESTING, THE USING A SINCO YOOO T2 TRACK MOVITERS BAIL

GORING ADVANCE DO WORK CHY SOLID STEM ARGENT

* POCKET PENETROMETER READINGS

BORING NO. $\frac{\beta - 05l}{\binom{8}{3}}$

N 542140.8876 Grade El. 784.29 E 1724101.7636 PROJECT AREA % JOHN E. AMOS POWER PLANT ST. ALBANS, WV BORING NO. B-05/2 ELEVATION $\frac{795+}{2}$ GWL 0 HRS 2ν PROJECT NO. ω 40384.40-01 **HRS** PAGE $\frac{1}{\sqrt{1-\frac{1}{1-\frac$ DATE $0.4 - 0.5$ may 2.05 CLASSIFIED BY DAN SANCER **DESCRIPTION** BLOWS PER SIX INCHES
CORE RECOVERY/RUN
SAMPLE NO., TYPE & RQD (%) OR TORVANE % ROCK RECOVERY CONSISTENCY OR RECOVERY OR MATERIAL CLASSIFICATION

ROCK BROKENNESS **ROCK HARDNESS** SOIL DENSITY -USCS OR REMARKS* DEPTH (FT.) PROFILE COLOR $\overline{1}$ $\overline{2}$ 3 $\overline{\mathbf{4}}$ $\overline{5}$ $\overline{7}$ 6 8 9 10 A $S-1$ U. COOSE BROWN SILT, TRACE ORGANICS \mathbf{I} ml $\overline{115}$ $MOISC$ $\overline{2}$ 3.0 REC 1.0 STIFF B_{Lb} N SILM CLAY ٥I $M015T$ \neq 1.5 TJF $2\overline{3}$ $S - 3$ Loose $|U_{\omega} \omega_0|$ SANDY SILT, SUME ROCK FARCHEATS <u>m/ scigHTLY moist</u> 4.5 ACC 1.3 $5 - 4$ $\overline{5}$ q 6.0 REC 1.2 ST/FF GRAY + SILTY CLAY, TRACE ROCK FRALMENT اء 5464744 MOIST $41575F$ $\overline{\mathbf{z}}$ Brown $MST1FF$ $WET = \frac{\lambda}{\lambda} 107JF$ ϵ (7.5 AEC 0.8 8.0 صا- ک $\frac{26}{43}$ $\frac{m_{ADop}}{1}$ 9.0 AEC AS $U_1D\subseteq N\subseteq E$ ROCKFRAGMENTS AND SANDY SILT: 32
 32
 36 9_m $0a4$ GAA $5 - 7$ DE COMPOSED CLAYSTONE $S_{\mathbf{M}}$ DM 10.5 $R2c$ ڪ ر -73 $5 - 8$ $0₁$ प्रश 12.0 Rec 1.5 $|8|$ 12.0 gm TPP of Rock: 12.0 ' 12.3 50/5. $5 - 9$ *14cm* v_{Fill} GREEN- $M(s$ o F Γ SILTY CLAYSTONE BR **MALO** PURPLE MOTTLES VBR BR чD $100 [100] 100 \%$ 22.0 22.15 MIHAAD LEGRAY SILTY SANDSTONE `er 0.0 0.0 0.0 $9₁$ 28,5 SILTY TO SANDY SHALE MISSET TO CRAY $BA-B$ MHARD.

REMARKS - DRILLED BY TERLA TESTING, INC. USING A SIMCO 4000-T2 TRACE MOUNTED DRUL

BURLAG ADVANCED USING 514" SOLID STEM AUGERS, 4' ID STEEL CASING, NQ-2 WIRELINE CORING TOOLS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $B-\frac{S^2}{2}$

* POCKET PENET ROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{\beta \cdot 6512}{\beta}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. B-0512

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 $\overline{}$

N 542140.8876

E 1724101.7636 Grade El. 784.29 f gelconsultants
/

BORING NO. $\frac{P_3 - 6513}{(10)}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \cdot

 $\bar{\mathcal{A}}$

N 540555.6419

Grade El. 948.40 E 1725145.9412

ELEVATION _______________ GWL 0 HRS 32. /

DATE $09 - 10$ men ass

HRS

REMARKS " DRILLED BY TOTALA TESTIN WITH A SING YOOR-TI TRACK MONTED ARILL

BORING ANOVANCED USING 514" SOLID SPEM QUERRS, 1!"S.D. STEEL CRSING, N2-2 WIRELINE COAING TOOLS

* POCKET PENETROMETER READINGS

BORING NO. $\frac{\beta - 0514}{(22)}$

* POCKET PENETROMETER READINGS

BORING NO. $\frac{\beta - 0514}{225}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{8-0514}{(22)}$

 $\boldsymbol{\star}$

* POCKET PENETROMETER READINGS

BORING NO. $\frac{B-0514}{(22)}$

* POCKET PENETROMETER READINGS

 $\sqrt{2}$

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{\sqrt{2} \cdot 0 \leq 11}{22}$

N 539572.1065 Grade El. E 1723680.1660

933.64

ALL ORILLED BY TERRA TESTING IS IN CA SINCO YOOOTI IRACK MOUNTED ON ILL

BOLING ADVANCED USING 544" SOLIO SPETARUSERS, 4" SEEL CASING, N& 2 WIFELINE COLING TOOLS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \mathcal{A}

BORING NO. $\frac{\beta \cdot 9515}{(24)}$

gai consultants
Innaforming Issus Into reality

C

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \sim κ

BORING NO. $\frac{\sqrt{3}-0.515}{(24)}$

gai consultants

C.

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{\beta - 6515}{(24)}$

 ϵ

 ϵ

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. B-0515

BORING NO. $13-0515$

 (24)

* POCKET PENETROMETER READINGS

 $\overline{}$

 ϵ

* POCKET PENETROMETER READINGS

BORING NO. $\frac{\beta - 0S}{(24)}$

 $\hat{\mathbf{z}}_i$ $\sim 10^{-11}$

 ~ 0.01

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

╦

BORING NO. $6 - 0515$
(24)

 \bar{z}

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

τ

 $\mathcal{A}^{\mathcal{A}}$

 $\ddot{}$

 $\frac{1}{1}$

J

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \mathcal{A}

BORING NO. $\frac{\beta - \sqrt{5} \sqrt{5}}{(24)}$

 \bar{z}

 $\ddot{}$

N 540842.6369 864.94 Grade El. E 1724930.8565

gai consultants

REMARKS " DRILLED BY TEXILA TESTING, ENC WIING A SIMCO 4000-TZ TRACK MOWNTES DRILL.

BORING ADVANCED USING 514" SOLID STEM ANGELES

* POCKET PENETROMETER READINGS

N 542185.2965 E 1725391.3276 Grade El. 945.55

REMARKS .. <u>MAILLED BY</u> RELAGRESTING USING A SIMCO LOUD-T2 TRACK MOUNTED BRILL

BORING ADVANCED USING 544" SOLID STEM ALGERS, 4" STEEL CASING, MQ-2 WILELINE CORING TOOLS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. B-0517

 \sim

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

7

 \mathcal{L}

BORING NO. $\frac{\beta \cos(7)}{(21)}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

7

BORING NO. $\frac{\beta_2 \cdot 0.517}{(21)}$

l,

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \cdot

BORING NO. $\frac{\sqrt{3}-0.577}{(21)}$

 $\hat{\mathcal{A}}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 $\ddot{}$

BORING NO. $R-\frac{8-0517}{(21)}$ $\overline{}$

N 541508.473 1015.78 Grade El. E 1724947.2614

gai consultants

REMARKS - DRILLED BY TERRA TESTING INC. USING A SIMCO YOOO-T2 TRACK MOUNTED DAIL

BRING ADVANCED USING 51/4"SOLID STEMALLGERS, 4" STEEL CASING, NQ-2 WIRELINE CORING TOOLS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{\beta - 0518}{(29)}$

REMARKS "

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

٠,

 $\mathcal{L}^{\mathcal{L}}$

BORING NO. $6 - 6518$

 (29)

L,

* POCKET PENETROMETER READINGS

BORING NO. $\frac{\beta - 05/8}{(29)}$
N 543732.8856

Grade El. 991.07 E 1725136.5233

REMARKS " DRILLED BY FEXAA TESTING USING A SIMCO 4000-T2 TRACK MONUTED ALILL

BORING ADVANCED USING 514"SOLID STEM AUGERS, 4"STEEL CASING, NQ.2 WIKELINE COMING TOOLS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. B-0519

 (20)

BORING NO. $\frac{\sqrt{3}-0.519}{(20)}$

 \mathcal{L}^{max} , where \mathcal{L}

÷,

REMARKS **

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

t

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{\beta - 0519}{(20)}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

Ŧ

 \mathcal{L}^{\pm}

BORING NO. $\frac{B-0519}{2}$ (20) $\ddot{}$

 $\hat{\mathcal{L}}$.

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \cdot

 $\bar{\mathcal{A}}$

BORING NO. $9 - 6519$
(20)

 $\ddot{}$

N 542378.3755

galconsultants

REMARKS "DRILLED BY TERRIA TESTING, INC. USING A 5, MCD YOOD-TL TRACK MOUNTED DEILL

BORING ADMICED USING 5/4"SOLID STEM AUGERS, 4" STEEL CASING, NQ-2 WIRELINE CORING TOOLS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING $\bar{\mathcal{A}}$

BORING NO. $R-\frac{6520}{5}$

 ϵ

* POCKET PENETROMETER READINGS

ŵ

** METHOD OF ADVANCING AND CLEANING BORING

 $\ddot{}$

BORING NO. $\frac{3-0520}{515}$

فريط

REMARKS **_

* POCKET PENETROMETER READINGS

 $\mathcal{F}^{\mathrm{loc}}$

** METHOD OF ADVANCING AND CLEANING BORING

 $\hat{\mathcal{L}}$

BORING NO. $\frac{8-0520}{(5)}$

 $\hat{\mathcal{A}}$

 \mathcal{L}

 ϵ

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 $\overline{}$

 $\mathcal{L}^{\mathcal{L}}$

BORING NO. $8 - 2520$

 \bar{z}

REMARKS "DALLLED BY TERRA TESTING, PE. USING A 51 MC 5/000-72 TRACK MONOTED. O RILL

BORING ADVANCED USING 514 SOLID STEM AUGERS, 4"STEEL CASING, NO. 2 WILELINE CORING TOOLS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{B - 0521}{(k)}$

 $\hat{\mathcal{L}}$.

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 $\overline{}$

 \mathcal{L}^{\pm}

BORING NO. $\frac{\beta - 0521}{(19)}$

 \bar{z}

 $\begin{array}{c} 0 \\ 0 \\ 0 \\ 0 \end{array}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \cdot

 \sim

BORING NO. $\frac{\beta - 0521}{(19)}$

 $\bar{}$

 $\ddot{}$

ESTING INC USING A SIMCO 4000-T2 TRACKMOUNTED BLILL

BORING ADVANCEDUSING SVY SOLID STEM AUGERS, 4"STEEL CASING, M2-2 WIRELINE CORING TOOLS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \sim

BORING NO. $\frac{\beta - 0522}{(10)}$

 ~ 0.1

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 $\ddot{}$

 \bar{C}

BORING NO. $\frac{B-0522}{(18)}$

 \sim

* POCKET PENETROMETER READINGS

 \bar{z}

** METHOD OF ADVANCING AND CLEANING BORING

Ţ

 $\mathcal{A}^{\mathcal{A}}$

BORING NO. $\frac{\beta - 0522}{(\sqrt{\beta})}$

 \mathbf{r}

 $\ddot{}$

 $\bar{\tau}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

т,

BORING NO. $\frac{B - 0522}{(18)}$

 $\ddot{}$

 $\overline{1}$

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 $\mathcal{L}^{\mathcal{L}}$

BORING NO. $\frac{\beta - \omega_5}{2}$

C

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

Ţ

 $\hat{\mathcal{A}}$

 \overline{a}

BORING NO. $\frac{12-0522}{(18)}$

 \mathbb{Z}^2

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

7

BORING NO. $B = 0522$

 $\ddot{}$

 \mathcal{L}

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $5-052$
(18)

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{3.0522}{18}$

REMARKS . DRILLED BY TERLAN TESTING INC USING A SIMCO LOOD. T2 TRACK MOUNTED DRILL

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $\frac{\beta - 0523}{(13)}$ \mathbb{Z}_2

A eigal consultants

 \mathcal{P}

 $\overline{}$

REMARKS **

 \sim

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

 \sim

Τ

BORING NO. $\frac{\beta - 0.533}{(13)}$

 $\ddot{}$

N 542745.0961 Grade El. E 1722251.4149

696.91

REMARKS .. DRILLED BY TEMAR TESTING USING A SIMCO 4000-T2 TRACK MOUNTED BRILL

BORING AGRANCED USING 5 14" SOLID STEM AUGERS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. B-0524 (14)

N 542379.9472 E 1721745.3670 Grade El. 679.43

PROJECT AREA^{2/3}, JOHN E. AMOS BWER PLANT, ST. ALBANS, WV BORING NO. $B - 0525$ ELEVATION _______________GWL 0 HRS __ BRLY PROJECT NO. COYO'S 84.43-01 **HRS** PAGE $\frac{1}{\sqrt{1-\frac{1}{1-\frac$ DATE 25 MGY 2005 CLASSIFIED BY DAN SANGER **DESCRIPTION** BLOWS PER SIX INCHES
ORE RECOVERY/RUN
CORE RECOVERY/RUN ROCK BROKENNESS RQD (%) OR TORVANE % ROCK RECOVERY SAMPLE NO., TYPE &
RECOVERY OR CONSISTENCY OR USCS OR ROCK HARDNESS SOIL DENSITY -MATERIAL CLASSIFICATION REMARKS* DEPTH (FT.) PROFILE COLOR $\overline{1}$ $\overline{7}$ $\overline{4}$ $\overline{5}$ $\boldsymbol{2}$ $3¹$ 6 8 $\overline{9}$ 10 ALLER W/ SAMPLING TO $l \circ F$ INSTALL PIEZOMETER TIP AT 10 Fr SEE BORING B-0520 FOR S OIL DESCRIPTION 10.0 $10,0$ BOTTOM OF BORNIG 10.0 FC

REMARKS "DRILLED BY TETLAA TESTING, INC. NSING A SIMCO 4000-TZ TRACK MONTED DAILL.

BOLING ADVANCED USING 5/4" SOLID STEM AUGERS

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. B-0525

gai consultants

* POCKET PENET ROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $0536 (mW-1)$

 $\overline{}$ \sim

* POCKET PENETROMETER READINGS

 $\bar{.}$

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $O535 (MW-2)$

œ.

 $\ddot{}$

REMARKS "30'south of 0509, 414°ID HSA to 25.6' 4'D air rotory whommer to 41.0'
Simco 4000-Ta TrackRig, Doug Novotry Driller, Terra Testing

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. $OSa7(mw3)$

 \sim

 $\mathbb{E}[\mathcal{A}]$

Doug Novotay Driller Terre Testing. * POCKET PENETROMETER READINGS

 \cdot

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. 0532 (mw-4)

E 1753080.68 Grade El. 674.84 Top of PVC Riser El. 676.84

* POCKET PENETROMETER READINGS

 \sim $\chi_{\rm c}$

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. 0533 (MW-5)

REMARKS" 494 1D Hollow Stem Augers to 14, 4 p down hole hammer w/air to 91.0

* POCKET PENETROMETER READINGS

 \cdot

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. 0526 (MW-6)

* POCKET PENETROMETER READINGS

÷

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. 0528 $(mw-7)$

- 6

* POCKET PENETROMETER READINGS

 \bar{z}

 111

** METHOD OF ADVANCING AND CLEANING BORING
.

BORING NO. 0934 $(mw-8)$

N 544221.98

933.39 Top of PVC Riser El. 935.39

n survey Pt. 307, 41/4" 10 HSA to 5.0", 4" & AIT rotary w/hammer to REMARKS " $\frac{25f}{11}$ N 345 W from Survey Pt. 307

Track Rig Simca 4000-Ta

* POCKET PENETROMETER READINGS

BORING NO. $OS30 \mid m \sim \gamma$

** METHOD OF ADVANCING AND CLEANING BORING

f gal consultants
f N 544019.11 E 1754183.58 Grade El. 909.43 Top of PVC Riser El. 911.43 PROJECT Area 2/3 John E Amos Power Station BORING NO. $OS31$ ($mw-io$) PROJECT NO. CO 40384, 40.01 ELEVATION _____________ GWL 0 HRS DTY 24 HRS $102'$ **Contract** R PAGE $\frac{1}{\sqrt{1-\rho}}$ of $\frac{2}{\sqrt{1-\rho}}$ $6 - 30 - 05$ CLASSIFIED BY T. R. GOWET DATE **DESCRIPTION** BLOWS PER SIX INCHES
CORE RECOVERV/RUN
SAMPLE NO., TYPE &
RECOVERY OR
PECOVERY OR
PECOVERY ROCK BROKENNESS CONSISTENCY OR
ROCK HARDNESS RQD (%) OR TORVANE **JSCS OR** SOIL DENSITY -**REMARKS*** MATERIAL CLASSIFICATION DEPTH_(FT.) PROFILE COLOR 10 $\overline{7}$ $\overline{8}$ $\overline{9}$ $\overline{6}$ $\overline{4}$ 5 $\overline{\mathbf{1}}$ $\overline{2}$ 3 Clavey Silt $Start$ 4:00. BR <u> 9.0</u> Decomposed Claystone Red Dry Weathered claystone Auger to 10.0' **G.II** Silty shale/siltstone Lt BR <u>30.0</u> \overline{BC} Sand stone 20 Siltstone-Red@29.0' LtGray $GmyQ31.0$ 34.0 Red Claystone 36.0 Fine grain Sandstone \overline{Hard} $6 - 4$ 40.5 I Red Claystone Gray 46.0 $5h\varphi$ sioo ess' Siltstone Gray 58,0 Claystone Red $\overline{\omega}$.0 Silfstone / V. Fine Grain Gray Sandstone, shaley 71.이 Hard G_{TO} Sandstone \bf{r} 76.0 Siltstone/Claystone S Red 81.0 82.0 Hard Sand stone G_{ray} $S(1+s+one)$ Gray 84.0 Sandstone/w/6" seams Hard Gray $ShpQIL'II.05AM$ of softersiltstone 125.0 Red Claystone ∤। 28.0

REMARKS " 4/4 2D Hollow Stem Angers to 10.0' 4" Air Rotary w/hammer 10.0' to 157.0'

Simco 4000-T2 Track Rig, Doug Novotny Driller, Terra Testing

* POCKET PENETROMETER READINGS

BORING NO. $OS31$ $(mw-w)$

** METHOD OF ADVANCING AND CLEANING BORING

* POCKET PENETROMETER READINGS

** METHOD OF ADVANCING AND CLEANING BORING

BORING NO. 053/ (mw-10)

 \blacktriangleright

Definition of Terms

Used to Describe Subsurface Materials

 \mathbf{r}

GAI Consultants, Inc. 2006

Well Construction Diagrams

B-0501 to B-0515, B-0517, B-0519 to B-0525 & MW-1 to MW-10

gal consultants

STANDPIPE PIEZOMETER INSTALLATION SKETCH

gal consultants

STANDPIPE PIEZOMETER INSTALLATION SKETCH

gal consultants

STANDPIPE PIEZOMETER INSTALLATION SKETCH

STANDPIPE PIEZOMETER INSTALLATION SKETCH

STANDPIPE PIEZOMETER INSTALLATION SKETCH

gal consultants

STANDPIPE PIEZOMETER INSTALLATION SKETCH

STANDPIPE PIEZOMETER INSTALLATION SKETCH

MONITORING WELL CONSTRUCTION DIAGRAM (Not to Scale) Project AREA 2/3 A MOS POWER PLAIT Project No. CO 40384.40-01
Well No. 8-0508
N 541 996.9754 Date 03 MAY ROOS DBS Engineer/Geologist $E1723377.3436$ Vented Height Elevation Cap -980.97 d **Protective Casing** with Locking Cap \dot{B} 979.22 Elevation Concrete **Ground Surface** Pad $\mathbf C$ Bentonite or Concrete $\frac{3}{4}$ in. Schedule 40
PVC Riser Cement $rac{or}{\sqrt{1}}$ Bentonite K **Bentonite Pellets** D Fine Sand E Sensing $\frac{3\sqrt{1}}{PVC}$ in. Schedule 40 Section G TM Coarse Sand Depth Elevation ţн BENTONITE Gement 2009 Depth Elevation J

gal consultants

STANDPIPE PIEZOMETER INSTALLATION SKETCH

e gal consultants

MONITORING WELL CONSTRUCTION DIAGRAM (Not to Scale)

STANDPIPE PIEZOMETER INSTALLATION SKETCH

gal consultants

STANDPIPE PIEZOMETER INSTALLATION SKETCH

STANDPIPE PIEZOMETER INSTALLATION SKETCH

gal consultants ъ

STANDPIPE PIEZOMETER INSTALLATION SKETCH

STANDPIPE PIEZOMETER INSTALLATION SKETCH

gal consultants

STANDPIPE PIEZOMETER INSTALLATION SKETCH

STANDPIPE PIEZOMETER INSTALLATION SKETCH

gal consultants

STANDPIPE PIEZOMETER INSTALLATION SKETCH

Remarks PACKER ASSEMBLY STUCK IN HOLE. SALVAGED

WORK PACKET AND AMP. PUTTED REMAINDER D.JWN HOLE.

gal consultants ۰

STANDPIPE PIEZOMETER INSTALLATION SKETCH

gal consultants

STANDPIPE PIEZOMETER INSTALLATION SKETCH

STANDPIPE PIEZOMETER INSTALLATION SKETCH

gal consultants

STANDPIPE PIEZOMETER INSTALLATION SKETCH

a gal consultants

STANDPIPE PIEZOMETER INSTALLATION SKETCH

gal consultants

STANDPIPE PIEZOMETER INSTALLATION SKETCH

STANDPIPE PIEZOMETER INSTALLATION SKETCH

Remarks

 λ

 \hat{C}

WELL / PIEZOMETER SCHEMATIC

 \mathbb{C}

WELL / PIEZOMETER SCHEMATIC

WELL / PIEZOMETER SCHEMATIC

WVDEP Monitoring Well & Piezometer Closure Information

WVDEP Monitoring Well & Piezometer Pending Closure Information

Notes:

Information provided by West Virginia Department of Environmental Protection as pending database upload. NA - Not Applicable GPS - Global Positioning System

WVDEP Oil & Gas Well Closure Information

WVDEP Office of Oil and Gas - Well Search

Disclaimer: Per §22-6-6. Permit required for all well work; permit fee; application; soil erosion control plan.

(a) It is unlawful for any person to commence any well work, including site preparation work, which involves any disturbance of land, without first securing a well work permit from the director of the WVDEP Office of Oil and Gas.

The appearance of an API number on the web page does not signify that a permit has been issued. The API number is used as a tracking mechanism until the permit has been issued. Under no circumstances should well work be commenced without a signed permit.

The operator listed above is the CURRENT operator of the well.

This operator may or may not have recorded production for this well for the years listed below.

The production listed below spans this well's 5 last years, regardless of the operator who originally recorded a particular year's production numbers.

Well Lifetime Gas Production

No Production Reported

Well Lifetime Oil Production

No Production Reported

Well Lifetime NGL Production

No Production Reported

The West Virginia Department of Environmental Protection (WVDEP) makes oil and gas well information and production data available to the general public through this internet service free of charge.

The oil and gas related data originate from the information reported to the Office of Oil and Gas at WVDEP by West Virginia oil and gas operators. The WVDEP does not guarantee their accuracy, precision, or completeness.

Neither the West Virginia Department of Environmental Protection nor its staff members are liable or responsible for any damage or loss resulting from the use of these data or from inaccuracies contained in the data.

We encourage you to report any problems, inconsistencies, or errors noted in using this data to the Office of Oil and Gas so that we can correct them and provide better service.

Office of Oil and Gas Department of Environmental Protection 601 57th St Charleston, West Virginia 25304 Phone: (304) 926-0499 Fax: (304) 926-0452

WVDEP Office of Oil and Gas - Well Search

Disclaimer: Per §22-6-6. Permit required for all well work; permit fee; application; soil erosion control plan.

(a) It is unlawful for any person to commence any well work, including site preparation work, which involves any disturbance of land, without first securing a well work permit from the director of the WVDEP Office of Oil and Gas.

The appearance of an API number on the web page does not signify that a permit has been issued. The API number is used as a tracking mechanism until the permit has been issued. Under no circumstances should well work be commenced without a signed permit.

The operator listed above is the CURRENT operator of the well.

This operator may or may not have recorded production for this well for the years listed below.

The production listed below spans this well's 5 last years, regardless of the operator who originally recorded a particular year's production numbers.

Well Lifetime Gas Production

No Production Reported

Well Lifetime Oil Production

No Production Reported

Well Lifetime NGL Production

No Production Reported

The West Virginia Department of Environmental Protection (WVDEP) makes oil and gas well information and production data available to the general public through this internet service free of charge.

The oil and gas related data originate from the information reported to the Office of Oil and Gas at WVDEP by West Virginia oil and gas operators. The WVDEP does not guarantee their accuracy, precision, or completeness.

Neither the West Virginia Department of Environmental Protection nor its staff members are liable or responsible for any damage or loss resulting from the use of these data or from inaccuracies contained in the data.

We encourage you to report any problems, inconsistencies, or errors noted in using this data to the Office of Oil and Gas so that we can correct them and provide better service.

Office of Oil and Gas Department of Environmental Protection 601 57th St Charleston, West Virginia 25304 Phone: (304) 926-0499 Fax: (304) 926-0452

WVDEP Office of Oil and Gas - Well Search

Disclaimer: Per §22-6-6. Permit required for all well work; permit fee; application; soil erosion control plan.

(a) It is unlawful for any person to commence any well work, including site preparation work, which involves any disturbance of land, without first securing a well work permit from the director of the WVDEP Office of Oil and Gas.

The appearance of an API number on the web page does not signify that a permit has been issued. The API number is used as a tracking mechanism until the permit has been issued. Under no circumstances should well work be commenced without a signed permit.

The operator listed above is the CURRENT operator of the well.

This operator may or may not have recorded production for this well for the years listed below.

The production listed below spans this well's 5 last years, regardless of the operator who originally recorded a particular year's production numbers.

Well Lifetime Gas Production

No Production Reported

Well Lifetime Oil Production

No Production Reported

Well Lifetime NGL Production

No Production Reported

The West Virginia Department of Environmental Protection (WVDEP) makes oil and gas well information and production data available to the general public through this internet service free of charge.

The oil and gas related data originate from the information reported to the Office of Oil and Gas at WVDEP by West Virginia oil and gas operators. The WVDEP does not guarantee their accuracy, precision, or completeness.

Neither the West Virginia Department of Environmental Protection nor its staff members are liable or responsible for any damage or loss resulting from the use of these data or from inaccuracies contained in the data.

We encourage you to report any problems, inconsistencies, or errors noted in using this data to the Office of Oil and Gas so that we can correct them and provide better service.

Office of Oil and Gas Department of Environmental Protection 601 57th St Charleston, West Virginia 25304 Phone: (304) 926-0499 Fax: (304) 926-0452

Arcadis, Inc. 2018

Boring and Well Construction Logs

MW-1801 and MW-1802

WV015976.0005 JOB NUMBER

COMPANY Entertial metal control of the company of the company of the company $\frac{1}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company of the company of the company of the company COMPANY **American Electric Power**

 \mathbf{r}

PROJECT LATTOS - FGD Landfill **And Amos - Amos Container Container Bortoge Con**

Continued Next Page

WV015976.0005 JOB NUMBER

COMPANY Entertian Electric Power The Coring No. No. 2004, MW-1801 DATE 2004 DATE SHEET 2 OF 5 COMPANY **American Electric Power**

PROJECT **Amos - FGD Landfill**

 \mathbf{r}

BORING START 817/18 BORING FINISH 8/8/18

AEP.GDT - 5/3/19 11:49 - S:IKNOXVILLE-TMFOR NICOLE AEP LOG EDIT FILES/GINT LOGS OUTPUTAEP MOUNTAINEER/AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 5/3/19 11:49 - S:\KNOXVILLE-TN\FOR NICOLE AEP LOG EDIT FILES\GINT LOGS OUTPUT\AEP MOUNTAINEER\AEP MOUNTAINEER.GPJAEP-

WV015976.0005 JOB NUMBER

PROJECT **Amos - FGD Landfill**

COMPANY Entertian Electric Power The Coring No. No. 2004, MW-1801 DATE 2019 SHEET A GF 5 **American Electric Power**

BORING START 817/18 BORING FINISH 8/8/18

WV015976.0005 JOB NUMBER

LOG OF BORING

 \mathbb{R}^2

PROJECT **Amos - FGD Landfill** COMPANY **American Electric Power**

COMPANY Entertian Electric Power The Coring No. No. 2004, MW-1801 DATE 1980 DATE SHEET THE STRING OF THE STRING

BORING START 817/18 BORING FINISH 8/8/18

Wireline Core

WV015976.0005 JOB NUMBER

COMPANY Entertial metal particle power the second of t **American Electric Power**

PROJECT **Amos - FGD Landfill**

BORING START 8/20/18 BORING FINISH 8/21/18

Continued Next Page

WV015976.0005 JOB NUMBER

PROJECT **Amos - FGD Landfill**

COMPANY Entertial metal control of the company of the company of the company $\frac{1}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company of the company of the company of the company **American Electric Power**

BORING START 8/20/18 BORING FINISH 8/21/18

WV015976.0005 JOB NUMBER

American Electric Power

AEP - AEP - 5/3/19 11:49 - S:NKNOXVILLE-TWFOR NICOLE AEP LOG EDIT FILESIGINT LOGS OUTPUTAEP MOUNTAINEER AER VOLUTAINEER. GPJ AEP - AEP.GDT - 5/3/19 11:49 - S:\KNOXVILLE-TN\FOR NICOLE AEP LOG EDIT FILES\GINT LOGS OUTPUT\AEP MOUNTAINEER\AEP MOUNTAINEER.GPJ

PROJECT **Amos - FGD Landfill**

COMPANY Entertial metal control of the company of the com

BORING START 8/20/18 BORING FINISH 8/21/18

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Entertial metal control of the company of the company of the company $\frac{1}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company of the company of the company of the company

PROJECT LATTOS - FGD Landfill **And Amos - Among Latter Control Control**

APPENDIX C

Well Survey

Prepared for:

ARCADIS U.S., INC.-Columbus 630 Plaza Drive, Suite 600 Highlands Ranch, CO 80129

Water Well Report

FGD LANDFILL WV PO #: WV015976.0004 ES-124909 Thursday, July 20, 2017

Geographic Summary

Location

WV
Tarr t location is 0.405 square miles and has a 3.4 mile perimeter

Summary Map - 0.5 Mile Buffer

Topographic Overlay Map - 0.5 Mile Buffer

Current Imagery Overlay Map - 0.5 Mile Buffer

Water Well Details

Well Summary

Disclaimer

The Banks Environmental Data Water Well Report was prepared from existing state water well databases and/or additional file data/records research conducted at the state agency and the U.S. Geological Survey. Banks Environmental Data has performed a thorough and diligent search of all groundwater well information provided and recorded. All mapped locations are based on information obtained from the source. Although Banks performs quality assurance and quality control on all research projects, we recognize that any inaccuracies of the records and mapped well locations could possibly be traced to the appropriate regulatory authority or the actual driller. It may be possible that some water well schedules and logs have never been submitted to the regulatory authority by the water driller and, thus, may explain the possible unaccountability of privately drilled wells. It is uncertain if the above listing provides 100% of the existing wells within the area of review. Therefore, Banks Environmental Data cannot fully guarantee the accuracy of the data or well location(s) of those maps and records maintained by the regulatory authorities.

APPENDIX D

Hydrographs and Hydraulic Testing Results

Well Development Field Logs

WELL DEVELOPMENT LOG

WELL DEVELOPMENT LOG

Development Personnel: AEP Staff: Rick Baker

Notes: Water Quality Parameters collected during yield testing on 9/11/2018 by Arcadis

WELL DEVELOPMENT LOG

Site/Well No. MW-1802

Packer Test Logs

BEDROCK INJECTION PACKER TESTING LOG

Test 1 Test 2 Constant Pressure (psi) Constant Pressure (psi)

60

Flow Rate (gpm)

 $h1$ = distance between gage and water table $r =$ radius of test hole

h2 = applied pressure at gage A = length of test section

Reference

Pre-Test 1 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test Solution

Duration **Pressure Pressure Pressure** Pressure **Duration** Duration **Pressure** Pressure (mins) (psi) (mins) (psi)

> Borehole Water Level (ft)

ft bgs- feet below ground surface gpm - gallons per minute cm/s - centimeters per second

Flow Totalizer Readings (gallons)

psi - pounds per square inch

ft amls - feet above mean sea level

NA - not available

N/A - not applicable

NR - not recorded

BEDROCK INJECTION PACKER TESTING LOG

Test 1 Test 2

Time

 $h1$ = distance between gage and water table $r =$ radius of test hole

h2 = applied pressure at gage A = length of test section

Reference

Pre-Test 1 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test Solution

Duration **Pressure Pressure Pressure** Pressure **Duration** Duration **Pressure** Pressure

Notes:

- ft bgs- feet below ground surface gpm - gallons per minute cm/s - centimeters per second
- psi pounds per square inch
- ft amls feet above mean sea level
- NA not available
- N/A not applicable
- NR not recorded

Test 1 Test 2

Constant Pressure (psi) 60 **Constant Pressure (psi)**

60

 $h1$ = distance between gage and water table $r =$ radius of test hole

h2 = applied pressure at gage A = length of test section

Reference

Pre-Test 1 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test Solution

Duration **Pressure Pressure Pressure** Pressure **Duration** Duration **Pressure** Pressure (mins) (psi) (mins) (psi)

ft bgs- feet below ground surface gpm - gallons per minute cm/s - centimeters per second

psi - pounds per square inch

ft amls - feet above mean sea level

NA - not available

N/A - not applicable

NR - not recorded

Flow Totalizer Readings (gallons) Flow Rate (gpm) Borehole Water Level (ft)

Test 1 Test 2

Constant Pressure (psi) Constant Pressure (psi) 60 100

 $h1$ = distance between gage and water table $r =$ radius of test hole

h2 = applied pressure at gage A = length of test section

Reference

Pre-Test 1 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test Solution

Duration **Pressure Pressure Pressure** Pressure **Duration** Duration **Pressure** Pressure (mins) (psi) (mins) (psi)

ft bgs- feet below ground surface gpm - gallons per minute cm/s - centimeters per second

psi - pounds per square inch

ft amls - feet above mean sea level

NA - not available

N/A - not applicable

NR - not recorded

Flow Totalizer Readings (gallons) Flow Rate (gpm) Borehole Water Level (ft)

Test 1 Test 2

Constant Pressure (psi) Constant Pressure (psi) 100

60

 $h1$ = distance between gage and water table $r =$ radius of test hole

h2 = applied pressure at gage A = length of test section

Reference

Pre-Test 1 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test Solution

Duration **Pressure Pressure Pressure** Pressure **Duration** Duration **Pressure** Pressure (mins) (psi) (mins) (psi)

Notes:

ft bgs- feet below ground surface gpm - gallons per minute cm/s - centimeters per second

psi - pounds per square inch

ft amls - feet above mean sea level

NA - not available

N/A - not applicable

NR - not recorded

Flow Totalizer Readings (gallons) Flow Rate (gpm) Borehole Water Level (ft)

Test 1 Test 2

Constant Pressure (psi) Constant Pressure (psi) 100

60

 $h1$ = distance between gage and water table $r =$ radius of test hole

h2 = applied pressure at gage A = length of test section

Reference

Pre-Test 1 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test 2 Pre-Test Solution

Duration **Pressure Pressure Pressure** Pressure **Duration** Duration **Pressure** Pressure

(mins) (psi) (mins) (psi)

Notes:

ft bgs- feet below ground surface gpm - gallons per minute cm/s - centimeters per second

psi - pounds per square inch

ft amls - feet above mean sea level

NA - not available

N/A - not applicable

NR - not recorded

Well Yield Tests

Field Logs

ARCADIS Expanding ARCADIS

Well Yield - Pumping Drawdown/Recovery Log

ARCADIS Expanding ARCADIS

Well Yield - Pumping Drawdown/Recovery Log

Well Yield Tests

AQTESOLV Plots

High-Resolution Water Level Monitoring Evaluation

HIGH-RESOLUTION WATER LEVEL MONITORING EVALUATION

INTRODUCTION

Arcadis U.S., Inc. (Arcadis) completed a high-resolution water level monitoring field event from May 7 to August 11, 2018 at the American Electric Power Service Corporation (AEP) Generating Plant (Plant) FGD Landfill located in Winfield, West Virginia. The objectives of the monitoring and evaluation were to better characterize hydrogeologic conditions and permeability within the stress relief fracture system (SRF) and shallow alluvium.

HIGH-RESOLUTION WATER LEVEL MONITORING

Introduction and Methods

Continuous water levels collected in high-resolution in the SRF and shallow alluvial zone monitoring wells were collected from May 7 through August 11, 2018 by installation of Solinst® Levelogger® Junior Edge (model 3001 M5/F15) absolute (non-vented) pressure transducers at each hydraulic monitoring location. Other information collected included Site barometric pressure with a barometric pressure logger. The pressure transducers were set to a 5-minute linear logging interval for background monitoring. The barometric pressure logger was set in the outer casing of MW-5 and also set to a 5-minute linear logging interval. Pressure transducers were installed at each of the seven hydraulic monitoring locations (**Table D-1** and **Figure D-1**) that included three SRF monitoring wells located upgradient on ridges in the north valley (MW-8, MW-9 and MW-10), two downgradient SRF monitoring wells with one in the south valley (MW-2) and north valley (MW-4), and two downgradient shallow alluvium monitoring wells with one in the south valley (MW-1) and one north valley (MW-5). Note that pressure transducers within wells MW-1 and MW-2 were installed at a later date on June 20, 2019. Precipitation data was also obtained from www.ncdc.noaa.gov from the closest weather station to the Site (US1WVKN0021) located approximately 9 miles southeast of the Site to aid in the evaluation.

Pressure transducer and barometric pressure data were downloaded by AEP personnel on a bi-weekly basis in May 2018 and then monthly during June through August 2018. In addition, a manual groundwater level measurement to the top of casing survey point was obtained during each download event. After data collection, raw files were transferred and checked for quality control.

After downloading the data, the groundwater levels were processed and corrected for barometric pressure influences. Groundwater levels exhibit fluctuations due to a variety of influences, making hydrographs a good tool for understanding long-, mid- and short-term trends at any study site. Typical influences can include for example: recharge from precipitation events and/or bank storage, local or regional pumping, seasonal or long-term trends, barometric pressure fluctuations, surface water fluctuations, and ocean and/or earth tides. Of these external hydraulic influences, the following were observed at the Site during the monitoring period: precipitation events, barometric pressure fluctuations, and responses to groundwater sampling. Post-processing of the water level data included barometric compensation of the absolute data to obtain true water column, shift correction due to manual movement of pressure transducers that may occur when accessed, elevation calibration, and barometric correction

using a set estimated barometric efficiency. The elevation calibration involved converting the water column data to groundwater elevations by comparison to manual measurements from the surveyed reference point.

Following elevation calibration, a correction factor for barometric efficiency (BE) was estimated for each hydrograph to remove barometric effects on water levels. The BE is defined as the water-level change caused by a barometric-pressure change divided by that barometric pressure change (Clark 1967). The BE was determined using both a visual corrected and a graphical elliptical method (Gonthier 2007). Barometric efficiency varies between 0 and 1 where low values typically indicates unconfined groundwater zones while higher values typically indicates confined groundwater zones. All BE values were low ranging from 0.05 to 0.2 that indicate a level of confinement for the SRF. In the north valley, shallow alluvium well MW-5 did not have an observed barometric effect (unconfined shallow water table) and a correction was not applied; whereas, in the south valley, shallow alluvium well MW-1 did have observed barometric effects and a correction was applied with a BE of 0.2, which is likely due to the finer grained nature of the deposits at MW-1 within the vadose zone compared to coarser grained deposits at MW-5.

Hydrographs

Long-term groundwater hydrographs were competed that depict observations in water level changes in **Figures D-2** through **D-8**. Recharge occurs when precipitation infiltrates the unsaturated zones and reaches the capillary fringe in shallow groundwater systems. Deeper groundwater systems receive recharge via shallower groundwater zones and upgradient areas over longer periods of time. The presence of low permeability materials such as clay within the unsaturated zone can retard the rate of recharge and time lags occur depending on the thickness and vertical hydraulic conductivity (Fetter 2001). Additionally, the observed water level elevations confirm a vertical sequence separating the shallow alluvium and SRF indicating a level of hydraulic separation of the two zones (e.g. MW-1/MW-2 [south valley **Figures D-2** and **D-3**] and MW-4/5 [north valley **Figures D-4** and **D-5**]).

Several of the monitoring wells responded to precipitation events resulting in water level increases including MW-2, MW-4, MW-5 as well as MW-9, to a lesser extent. Sudden drops followed by recovery in water levels due to groundwater sampling were also observed in wells MW-5, MW-8, MW-9, and MW-10. The largest precipitation event that occurred during the monitoring period was on June 22, 2018 with almost 2 inches of rainfall in a 24-hour period. Monitoring well MW-5 had the highest magnitude of increase in response to precipitation of approximately 2-feet during this event. Following groundwater sampling events and an anomalous water level drop at MW-1, several wells had a recovery response that was more rapid at MW-5, MW-8, and MW-9 while other wells took several days or weeks to return to prepumping levels (MW-1, MW-10). The more rapid recharge response is reflective of a higher permeability of the materials at the respective locations.

SUMMARY

Continuous water level data in the SRF and shallow alluvial zone was collected in May through August 2018 in order to better characterize hydrogeologic conditions and permeability within the SRF system and shallow alluvium at the FGD Landfill. Pressure transducers were installed at each of the seven hydraulic monitoring locations that included three SRF monitoring wells located upgradient on ridges in the north

arcadis.com

valley (MW-8, MW-9 and MW-10), two downgradient SRF monitoring wells with one in the south valley (MW-2) and north valley (MW-4), and two downgradient shallow alluvium monitoring wells with one in the south valley (MW-1) and one north valley (MW-5).

The following external hydraulic influences were observed at the FGD Landfill during the monitoring period: precipitation events, barometric pressure fluctuations and responses to groundwater sampling. Water-levels were post-processed that included barometric compensation, shift correction, water-level elevation and barometric correction. Barometric efficiency was estimated for each monitoring well and varied from 0.05 to 0.2 and indicates a level of confinement for the SRF. In the north valley, shallow alluvium well MW-5 did not have a barometric effect reflecting unconfined shallow water table conditions. Shallow alluvium well MW-1 did have a barometric effect with a resulting barometric efficiency of 0.2, which is likely due to shallower finer grained material in the vadose zone compare to coarser deposits observed at MW-5. Additionally, the observed water level elevations confirm a vertical sequence separating the shallow alluvium and SRF indicating a level of hydraulic separation of the two zones (e.g. MW-1/MW-2 [south valley **Figures D-2** and **D-3**] and MW-4/5 [north valley **Figures D-4** and **D-5**]).

Several of the monitoring wells responded to precipitation events resulting in water level increases including MW-2, MW-4, MW-5 as well as MW-9, to a lesser extent. Sudden declines followed by recovery in water levels due to groundwater sampling were also observed in wells MW-5, MW-8, MW-9, and MW-10. Following groundwater sampling events and an anomalous decrease at MW-1, several wells showed a more rapid recharge such as MW-5, MW-8, and MW-9 (see **Figure D-7**) while other wells took several days or weeks to return to pre-pumping levels such as MW-10 (see **Figure D-8**). The more rapid recharge response is reflective of a higher permeability of the materials at the respective locations.

LIMITATIONS

Arcadis is not responsible for the independent conclusions, opinions, or recommendations made by others based on the data presented in this report. This report includes a limited set of data within the project site. The conclusions drawn from this investigation are considered reliable; however, there may exist localized variations in the subsurface conditions that have not been completely defined at this time. It should be noted that subsurface conditions may be better delineated with additional subsurface exploration and laboratory testing.

arcadis.com

REFERENCES

- Clark, W.E. 1967. Computing the barometric efficiency of a well. *Journal of the Hydraulics Division*, *93*(4), pp.93-98.
- Fetter, C.W. 2001. Applied Hydrogeology. 4th Edition, Prentice Hall, Upper Saddle River.
- Gonthier, G.J. 2007. A graphical method for estimation of barometric efficiency from continuous data– concepts and application to a site in the Piedmont. *Air Force Plant*, *6*.

Table D-1 High-Resolution Water Level Monitoring Well Construction Details AEP Amos Generating Plant - FGD Landfill Winfield, West Virginia

NOTES:

Elevation in feet above mean sea level

a. 1983 West Virginia State Planar Coordinates

b. Source: GAI Consultants. March 2006. Class F Industrial Landfill Facility Application, John E. Amos Landfill, Volume 1, Appendix K - Monitor Well Construction Diagrams.

amsl = above mean sea level

bls = Below land surface

ft = feet

Appendix E

Annual Groundwater Monitoring and Corrective Action Report

Annual Groundwater Monitoring Report

Appalachian Power Company John E. Amos Plant Bottom Ash Pond CCR Management Unit Winfield, West Virginia

January 2020

Prepared by: American Electric Power Service Corporation 1 Riverside Plaza Columbus, Ohio 43215

BOUNDLESS ENERGY"

Appendix 1 – GW Quality Data, GW Flow Directions, GW Flow Rates

- **Appendix 2** Statistical Analysis
- **Appendix 3** Alternative Source Demonstration
- **Appendix 4** Notices of Monitoring Program Transitions
- **Appendix 5** Well Installation/Decommissioning Logs

I. Overview

This *Annual Groundwater Monitoring* (Report) has been prepared to report the status of activities for the preceding year for an existing Bottom Ash Pond (BAP) CCR unit at Appalachian Power Company's, a wholly-owned subsidiary of American Electric Power Company (AEP) John E. Amos Power Plant. The USEPA's CCR rules require that the Annual Groundwater Monitoring Report be posted to the operating record for the preceding year no later than January 31.

In general, the following activities were completed:

- Groundwater data underwent various validation tests, including tests for completeness, valid values, transcription errors, and consistent units;
- Statistical analysis of assessment monitoring samples analyzed in November 2018, April 2019, and November 2019 were completed in 2019;
- As required by the CCR assessment monitoring program, two rounds of sampling that included all the Appendix III and detected Appendix IV parameters were performed in March and July 2019 in accordance with 40 CFR §§257.95(d)(1). A "screening" sample was obtained in accordance with 40 CFR §§257.95(b) and completed in June 2019. All detected parameters from the analysis of the June 2019 samples were included in the March and July 2019 sampling events. No statistically significant levels (SSL's) above groundwater protection standards (GWPS) occurred. The Amos BAP CCR Unit remains in the Assessment Monitoring Program per the federal CCR Rule.

The major components of this annual report, to the extent applicable at this time, are presented in sections that follow:

- A map/aerial photograph showing the BAP Complex CCR management unit, all groundwater monitoring wells, and monitoring well identification numbers.
- Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a statement as to why that happened, if applicable (**Appendix 5**).
- All of the monitoring data collected, including the rate and direction of groundwater flow, plus a summary showing the number of samples collected per monitoring well, the dates the samples were collected and whether the sample was collected as part of detection monitoring or assessment monitoring programs (**Appendix 1**).
- Results of the required statistical analysis of groundwater monitoring results (**Appendix 2**).
- Discussion of any alternative source demonstrations completed (**Appendix 3**).
- A summary of any transition between monitoring programs or an alternate monitoring frequency, for example the date and circumstances for transitioning from detection monitoring to assessment monitoring, in addition to identifying the constituents detected at a statistically significant increase over background concentrations, if applicable (**Appendix 4**).
- Other information required to be included in the annual report such as assessment of corrective measures, if applicable.

In addition, this report summarizes key actions completed, and where applicable, describes any problems encountered and actions taken to resolve those problems. The report includes a projection of key activities for the upcoming year.

II. Groundwater Monitoring Well Locations and Identification Numbers

Figure 1 depicts the PE-certified groundwater monitoring network, the monitoring well locations, and their corresponding identification numbers. The monitoring well distribution adequately covers downgradient and upgradient areas as detailed in the *Groundwater Monitoring Network Evaluation Report* that was placed in the American Electric Power CCR public internet site on March 9, 2017. The CCR groundwater quality monitoring network includes the following:

- Four upgradient wells MW-6, MW-1601, MW-1602A, and MW-1603A; and
- Six downgradient wells MW-1, MW-4, MW-5, MW-1604, MW-1605, and MW-1606.

Geosyntec^D Figure consultants Columbus, Ohio 2018/12/24

-
- \bigoplus Downgradient Sampling Location
- Ash Pond System

AEP Amos Generating Plant Winfield, West Virginia

1

Monitoring Well Network Evaluation - Amos Plant (Arcadis, 2016) provided by AEP.

- Rev. 1: Updated CCR Unit boundary. September 13, 2018

III. Monitoring Wells Installed or Decommissioned

There were no monitoring wells installed or decommissioned in 2019 at the Amos Plant Bottom Ash Pond Complex. The network design, as summarized in the *Groundwater Monitoring Network Evaluation Report* (*March 2017*) and as posted at the CCR web site for John E. Amos Plant, did not change. That evaluation report, viewable on the AEP CCR web site, discusses the facility location, the hydrogeological setting, the hydrostratigraphic units, the uppermost aquifer, and the design of the groundwater monitoring well network including downgradient and upgradient monitoring well locations.

IV. Groundwater Quality Data and Static Water Elevation Data, With Flow Rate and Direction Calculations and Discussion

Appendix 1 contains tables showing the groundwater quality data collected during the establishment of background quality and the groundwater monitoring samples collected during 2019. Static water elevation data from each monitoring event in 2019 are also shown in **Appendix 1**, along with the groundwater velocity calculations, groundwater flow direction and potentiometric maps developed after each sampling event.

V. Groundwater Quality Data Statistical Analysis

Statistical analysis of the assessment monitoring samples taken in November 2018 was completed in January 2019. No SSLs above a GWPS were identified. That report has been placed on the publicly accessible CCR website for John E. Amos Plant at https://www.aep.com/requiredpostings/ccr/Amos and is included in **Appendix 2**. Groundwater monitoring samples collected in March and July 2019 underwent statistical analysis. Those statistical analysis reports are also included in **Appendix 2**. No SSLs above a GWPS were identified in 2019. Therefore, the Amos BAP will remain in Assessment Monitoring.

VI. Alternative Source Demonstration

No alternative source demonstrations were performed in 2019.

VII. Discussion About Transition Between Monitoring Requirements or Alternate Monitoring Frequency

There have been no transitions between monitoring requirements at the Amos BAP since the transition to Assessment Monitoring in 2018.

Regarding defining an alternate monitoring frequency, the groundwater velocity and monitoring well production are high enough at this facility that no modification to the monitoring frequency is needed.

VIII. Other Information Required

The BAP has progressed from detection monitoring to its current status in assessment monitoring. All required information has been included in this annual groundwater monitoring report.

IX. Description of Any Problems Encountered in 2019 and Actions Taken

No significant problems were encountered. The low flow sampling effort went smoothly and the schedule was met to support the 2019 annual groundwater report preparation covering the year 2019 groundwater monitoring activities.

X. A Projection of Key Activities for the Upcoming Year

Key activities for 2020 include:

- Remain in assessment monitoring and sample all CCR wells at the BAP semi-annually for the Appendix III and IV parameters in accordance with 40 CFR §§257.95. Perform statistical analysis on the sampling results and compare the results of Appendix IV concentrations in downgradient wells to the GWPSs.
- If a GWPS is exceeded in a downgradient well the following activities will be undertaken:
	- o Characterize the nature and extent of a release by installing additional GW wells as necessary, estimate the quantity of material released and the concentrations of Appendix IV parameters that are in the material, and sample all wells to characterize the nature and extent of the release.
	- o If contaminants have migrated off-site, notify all persons who own land that directly overlies any part of the plume of contamination.
	- o Perform an alternate source demonstration (ASD) investigating whether the exceedance was caused by a source other than the BAP or was a result of an error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality.
- o If a successful ASD cannot be made, initiate an assessment of corrective measures and follow all of those requirements.
- Responding to any new data received in light of what the CCR rule requires.
- Preparation of the 2020 annual groundwater report.

APPENDIX 1 - GW Quality Data, GW Flow Directions, GW Flow Rates

Tables follow, showing the groundwater monitoring data collected in 2019, groundwater monitoring data collected during background sampling, the rate and direction of groundwater flow, and a summary showing the number of samples collected per monitoring well. The dates that the samples were collected also is shown.

Table 1 - Groundwater Data Summary: MW-1 Amos - BAP Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed
Table 1 - Groundwater Data Summary: MW-1 Amos - BAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-4 Amos - BAP Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-4 Amos - BAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-5 Amos - BAP Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-5 Amos - BAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-6 Amos - BAP Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-6 Amos - BAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1601 Amos - BAP Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1601 Amos - BAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1602A Amos - BAP Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1602A Amos - BAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1603A Amos - BAP Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1603A Amos - BAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1604 Amos - BAP Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1604 Amos - BAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1605 Amos - BAP Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1605 Amos - BAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1606 Amos - BAP Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1606 Amos - BAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 2: Residence Time Calculation SummaryAmos Bottom Ash Pond

Notes:

[1] - Background Well

[2] - Downgradient Well

Legend

- \bigoplus Monitoring Well Location
- Groundwater Flow Direction
- Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on March 14, 2019) provided by AEP.

- Groundwater elevation units are feet above mean sea level.

- Site features based on information available in the Ash Pond- CCR Groundwater Monitoring Well Network Evaluation - Amos Plant (Arcadis, 2016) provided by AEP.

Legend

- \bigoplus Monitoring Well Location
- Groundwater Flow Direction
- Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on June 10, 2019) provided by AEP.

1,000 500 0 1,000 **Potentiometric Surface Map - Uppermost Aquifer** Feet **June 2019** AEP Amos Generating Plant - Ash Pond System Winfield, West Virginia Geosyntec^D Figure consultants **2** Columbus, Ohio 2019/12/26

- Groundwater elevation units are feet above mean sea level.

- Site features based on information available in the Ash Pond- CCR Groundwater Monitoring Well Network Evaluation - Amos Plant (Arcadis, 2016) provided by AEP.

Legend

- \bigoplus Monitoring Well Location
- Groundwater Flow Direction
- Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on July 22, 2019) provided by AEP.

1,000 500 0 1,000 **Potentiometric Surface Map - Uppermost Aquifer** Feet **July2019** AEP Amos Generating Plant - Ash Pond System Winfield, West Virginia Geosyntec^D Figure consultants **3** Columbus, Ohio 2020/01/14

- Groundwater elevation units are feet above mean sea level.

- Site features based on information available in the Ash Pond- CCR Groundwater Monitoring Well Network Evaluation - Amos Plant (Arcadis, 2016) provided by AEP.

Statistical analysis reports completed in 2019 follow.

STATISTICAL ANALYSIS SUMMARY BOTTOM ASH POND Amos Plant Winfield, West Virginia

Submitted to

1 Riverside Plaza Columbus, Ohio 43215-2372

Submitted by

Geosyntec^D consultants

engineers | scientists | innovators

941 Chatham Lane Suite 103 Columbus, Ohio 43221

January 8, 2019

CHA8473

TABLE OF CONTENTS

LIST OF TABLES

LIST OF ATTACHMENTS

LIST OF ACRONYMS AND ABBREVIATIONS

- AEP American Electric Power
- BAP Bottom Ash Pond
- CCR Coal Combustion Residuals
- CCV Continuing Calibration Verification
- CFR Code of Federal Regulations
- GWPS Groundwater Protection Standard
- LCL Lower Confidence Limit
- LFB Laboratory Fortified Blanks
- LRB Laboratory Reagent Blanks
- MCL Maximum Contaminant Level
- NELAP National Environmental Laboratory Accreditation Program
- QA Quality Assurance
- QC Quality Control
- RSL Regional Screening Level
- SSI Statistically Significant Increase
- SSL Statistically Significant Level
- TDS Total Dissolved Solids
- UPL Upper Prediction Limit
- USEPA United States Environmental Protection Agency
- UTL Upper Tolerance Limit

SECTION 1

EXECUTIVE SUMMARY

In accordance with the United States Environmental Protection Agency's (USEPA's) regulations regarding the disposal of coal combustion residuals (CCR) in landfills and surface impoundments (40 CFR 257.90-257.98, "CCR rule"), groundwater monitoring has been conducted at the Bottom Ash Pond (BAP), an existing CCR unit at the Amos Power Plant located in Winfield, West Virginia.

Based on detection monitoring conducted in 2017 and 2018, statistically significant increases (SSIs) over background were concluded for calcium, chloride, total dissolved solids (TDS), and sulfate at the BAP. An alternate source was not identified at the time, so two assessment monitoring events were conducted at the BAP in 2018, in accordance with 40 CFR 257.95.

Groundwater data underwent several validation tests, including those for completeness, sample tracking accuracy, transcription errors, and consistent use of measurement units. No data quality issues were identified which would impact the usability of the data.

The monitoring data were submitted to Groundwater Stats Consulting, LLC for statistical analysis. Groundwater protection standards (GWPSs) were established for the Appendix IV parameters. Confidence intervals were calculated for Appendix IV parameters at the compliance wells to assess whether Appendix IV parameters were present at a statistically significant level (SSL) above the GWPS. No SSLs were identified, but Appendix III concentrations for calcium, chloride, pH, sulfate, and TDS remained above background. Thus, either the unit will remain in assessment monitoring or an alternative source demonstration will be conducted to evaluate if the unit can return to detection monitoring. Certification of the selected statistical methods by a qualified professional engineer is documented in Attachment A.

SECTION 2

BOTTOM ASH POND EVALUATION

2.1 Data Validation & QA/QC

During the assessment monitoring program, two sets of samples were collected for analysis from each upgradient and downgradient well to meet the requirements of 40 CFR 257.95(b) and $257.95(d)(1)$. Samples from both sampling events were analyzed for the Appendix III and Appendix IV parameters. A summary of data collected during assessment monitoring may be found in Table 1.

Chemical analysis was completed by an analytical laboratory certified by the National Environmental Laboratory Accreditation Program (NELAP). Quality assurance and quality control (QA/QC) samples completed by the analytical laboratory included the use of laboratory reagent blanks (LRBs), continuing calibration verification (CCV) samples, and laboratory fortified blanks (LFBs).

The analytical data were imported into a Microsoft Access database, where checks were completed to assess the accuracy of sample location identification and analyte identification. Where necessary, unit conversions were applied to standardize reported units across all sampling events. Exported data files were created for use with the Sanitas™ v.9.5 statistics software. The export file was checked against the analytical data for transcription errors and completeness. No QA/QC issues were noted which would impact data usability.

2.2 Statistical Analysis

Statistical analyses for the BAP were conducted in accordance with the January 2017 *Statistical Analysis Plan* (AEP, 2017), except where noted below. Time series plots and results for all completed statistical tests are provided in Attachment B.

The data obtained to meet the requirements of 40 CFR 257.95(b) and 257.95(d)(1) were screened for potential outliers. No outliers were identified. Outliers identified from the background and detection monitoring events conducted through January 2018 were summarized in a previous report (Geosyntec, 2018).

2.2.1 Establishment of GWPSs

A GWPS was established for each Appendix IV parameter in accordance with 40 CFR 257.95(h) and the *Statistical Analysis Plan* (AEP, 2017). The established GWPS was determined to be the greater value of the background concentration and the maximum contaminant level (MCL) or regional screening level (RSL) for each Appendix IV parameter. To determine background concentrations, an upper tolerance limit (UTL) was calculated using pooled data from the background wells collected during the background monitoring and assessment monitoring events.

Generally, tolerance limits were calculated parametrically with 95% coverage and 95% confidence. Non-parametric tolerance limits were calculated for arsenic, cadmium, fluoride, selenium, and thallium due to apparent non-normal distributions and for mercury due to a high non-detect frequency. Tolerance limits and the final GWPSs are summarized in Table 2.

2.2.2 Evaluation of Potential Appendix IV SSLs

A confidence interval was constructed for each Appendix IV parameter at each compliance well. Confidence limits were generally calculated parametrically $(\alpha = 0.01)$; however, non-parametric confidence limits were calculated in some cases (e.g., when the data did not appear to be normally distributed or when the non-detect frequency was too high). An SSL was concluded if the lower confidence limit (LCL) exceeded the GWPS (i.e., if the entire confidence interval exceeded the GWPS). Calculated confidence limits are shown in Attachment B.

No SSLs were identified at the Amos BAP.

2.2.3 Evaluation of Potential Appendix III SSIs

The CCR rule allows CCR units to move from assessment monitoring to detection monitoring if all Appendix III and Appendix IV parameters were at or below background levels for two consecutive sampling events [40 CFR 257.95(e)]. Since no Appendix IV SSLs were identified, Appendix III results were analyzed to assess whether concentrations of Appendix III parameters at the compliance wells exceeded background concentrations.

Prediction limits were calculated for the Appendix III parameters to represent background values. As described in the January 2018 *Statistical Analysis Summary* report (Geosyntec, 2018), intrawell tests were used to evaluate potential SSIs for fluoride and pH, whereas interwell tests were used to evaluate potential SSIs for boron, calcium, chloride, sulfate, and TDS.

Prediction limits for the interwell tests were recalculated using data collected during the 2018 assessment monitoring events. Eight data points (i.e., two samples from four background wells) were added to the background dataset for each interwell test. New data were tested for outliers prior to being added to the background dataset. The updated prediction limits were calculated for a one-of-two retesting procedure, as during detection monitoring. The values of the updated prediction limits were similar to the values of the prediction limits calculated during detection monitoring. The revised prediction limits were used to evaluate potential SSIs for boron, calcium, chloride, sulfate, and TDS.

For the intrawell tests, limited data made it possible to add only two data points (i.e., two samples from each compliance well) to each background dataset. Because two sample results are insufficient to compare against the existing background dataset, the prediction limits were not updated for the intrawell tests at this time. The prediction limits calculated during detection monitoring were used to evaluate potential SSIs for fluoride and pH.

Data collected during the second assessment monitoring event from each compliance well were compared to the prediction limits to evaluate SSIs. The results from this event and the prediction limits are summarized in Table 3. The following exceedances of the upper prediction limits (UPLs) were noted:

- Calcium concentrations exceeded the interwell UPL of 19.5 mg/L at MW-1 (39.9 mg/L and 38.3 mg/L), MW-1605 (47.0 mg/L and 49.4 mg/L), and MW-1606 (53.0 mg/L and 51.7 mg/L).
- Chloride concentrations exceeded the interwell UPL of 40 mg/L at MW-1 (71.9 mg/L and 67.9 mg/L), MW-1605 (97.1 mg/L for both events), and MW-1606 (119 mg/L and 133 mg/L).
- Sulfate concentrations exceeded the interwell UPL of 57.4 mg/L at MW-1 (154 mg/L and 145 mg/L), MW-1605 (246 mg/L and 213 mg/L), and MW-1606 (232 mg/L and 202 mg/L).
- TDS concentrations exceeded the interwell UPL of 250 mg/L at MW-1 (328 mg/L and 338) mg/L), MW-1605 (434 mg/L and 483 mg/L), and MW-1606 (478 mg/L and 507 mg/L).

Based on these results, concentrations of Appendix III parameters exceeded background levels at compliance wells at the Amos BAP during assessment monitoring. As a result, the Amos BAP CCR unit will remain in assessment monitoring.

2.3 Conclusions

Two assessment monitoring events were conducted in 2018 in accordance with the CCR Rule. The laboratory and field data were reviewed prior to statistical analysis, with no QA/QC issues identified that impacted data usability. A review of outliers identified no potential outliers in the 2018 data. GWPSs were established for the Appendix IV parameters. A confidence interval was constructed at each compliance well for each Appendix IV parameter; SSLs were concluded if the entire confidence interval exceeded the GWPS. No SSLs were identified.

The Appendix III results were evaluated to assess whether concentrations of Appendix III parameters exceeded background levels. Interwell tests were used to evaluate potential SSIs for boron, calcium, chloride, sulfate, and TDS, and intrawell tests were used to evaluate potential SSIs for fluoride and pH. The prediction limits for the interwell tests were updated with additional data collected from the background wells. Prediction limits were recalculated using a one-of-two retesting procedure. The prediction limits calculated during detection monitoring were used for the intrawell tests. Calcium, chloride, pH, sulfate, and TDS results exceeded background levels.

Based on this evaluation, the Amos BAP CCR unit will either remain in assessment monitoring or an ASD will be conducted to evaluate if the unit can return to detection monitoring.

SECTION 3

REFERENCES

American Electric Power (AEP). 2017. Statistical Analysis Plan – Amos Plant. January 2017.

Geosyntec Consultants (Geosyntec). 2018. Statistical Analysis Summary – Bottom Ash Pond, John E. Amos Plant, Winfield, West Virginia. January 15, 2018.

TABLES

Table 1 – Groundwater Data Summary Amos – Bottom Ash Pond

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Parameter was not present in concentrations above the method detection limit and is reported as the reporting limit

J: Estimated value. Parameter was detected in concentrations below the reporting limit

Table 2: Groundwater Protection Standards Amos Plant - Bottom Ash Pond

Notes:

Grey cell indicates calculated UTL is higher than MCL.

MCL = Maximum Contaminant Level

RSL = Regional Screening Level

Calculated UTL (Upper Tolerance Limit) represents site-specific background values.

The higher of the calculated UTL or MCL/RSL is used as the GWPS.

Table 3: Appendix III Data Evaluation Amos Plant - Bottom Ash Pond

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

NA: Not analyzed

Bold values exceed the background value.

Background values are shaded gray.
ATTACHMENT A Certification by Qualified Professional Engineer

Certification by Qualified Professional Engineer

I certify that the selected and above described statistical method is appropriate for evaluating the groundwater monitoring data for the Amos Bottom Ash Pond CCR management area and that the requirements of 40 CFR 257.93(f) have been met.

DAVID ANTHONY MILLER

Printed Name of Licensed Professional Engineer

awrd Anthony Milles

Signature

22663

WEST VIRGINIA

License Number

Licensing State

01.08.19

Date

ATTACHMENT B Statistical Analysis Output

GROUNDWATER STATS CONSULTING

November 11, 2018

Geosyntec Consultants Attn: Ms. Allison Kreinberg 150 E. Wilson Bridge Rd., #232 Worthington, OH 43085

Re: Amos Bottom Ash Pond Assessment Monitoring Event – September 2018

Dear Ms. Kreinberg,

Groundwater Stats Consulting (GSC), formerly the statistical consulting division of Sanitas Technologies, is pleased to provide the evaluation of groundwater data for the September 2018 Assessment Monitoring event for American Electric Power Company's Amos Bottom Ash Pond. The analysis complies with the federal rule for the Disposal of Coal Combustion Residuals from Electric Utilities (CCR Rule, 2015) as well as with the USEPA Unified Guidance (2009).

Sampling began at the site for the CCR program in 2016. The monitoring well network, as provided by Geosyntec Consultants, consists of the following:

- o Upgradient wells: BAP-MW-1601, BAP-MW-1602A, BAP-MW-1603A, and BAP-MW-6; and
- o Downgradient wells: BAP-MW-1, BAP-MW-1604, BAP-MW-1605, BAP-MW-1606, BAP-MW-4, and BAP-MW-5.

Data were sent electronically, and the statistical analysis was conducted according to the Statistical Analysis Plan and screening evaluation prepared by GSC and approved by Dr. Kirk Cameron, PhD Statistician with MacStat Consulting, primary author of the USEPA Unified Guidance, and Senior Advisor to GSC.

The CCR program consists of the following constituents:

- o **Appendix III** (Detection Monitoring) boron, calcium, chloride, fluoride, pH, sulfate, and TDS;
- \circ **Appendix IV** (Assessment Monitoring) antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, combined radium 226 + 228, fluoride, lead, lithium, mercury, molybdenum, selenium, and thallium.

Time series plots for Appendix III and IV parameters are provided for all wells and constituents; and are used to evaluate concentrations over the entire record. Values in background which have previously been flagged as outliers may be seen in a lighter font and disconnected symbol on the graphs.

Evaluation of Appendix III Parameters

Interwell prediction limits combined with a 1-of-2 verification strategy were constructed for boron, calcium, chloride, sulfate and TDS; and intrawell prediction limits combined with a 1-of-2 verification strategy were constructed for fluoride and pH. In the event of an initial exceedance of compliance well data, the 1-of-2 resample plan allows for collection of one additional sample to determine whether the initial exceedance is confirmed. When the resample confirms the initial exceedance, a statistically significant increase (SSI) is identified and further research would be required to identify the cause of the exceedance (i.e. impact from the site, natural variation, or an off-site source). If the resample falls within the statistical limit, the initial exceedance is considered a false positive result and, therefore, no further action is necessary. SSIs were noted for some of the Appendix III parameters and the results of those findings may be found in the Prediction Limit Summary tables following this letter.

When a statistically significant increase is identified, the data are further evaluated using the Sen's Slope/Mann Kendall trend test to determine whether data are statistically increasing, decreasing or stable. No statistically significant trends were found except for a statistically significant increasing trend for chloride in upgradient well MW-BAP-1601 and in downgradient well MW-BAP-1606. The Trend Test Summary Table follows this letter. Typically when trends are noted in upgradient wells, it is an indication of changing groundwater quality unrelated to the facility.

Evaluation of Appendix IV Parameters

Parametric tolerance limits were used to calculate background limits from pooled upgradient well data for Appendix IV parameters with a target of 95% confidence and 95% coverage to determine the Alternate Contaminant Level (ACL). The confidence and coverage levels for nonparametric tolerance limits are dependent upon the number of background samples. These limits were compared to the Maximum Contaminant Levels (MCLs) and Regional Screening Levels (RSLs) in the Groundwater Protection Standard (GWPS) table following this letter to determine the highest limit for use as the GWPS in the Confidence Interval comparisons.

Confidence intervals were then constructed on downgradient wells for each of the Appendix IV parameters using the highest limit of either the MCL, RSL, or ACL as discussed above. Only when the entire confidence interval is above a GWPS is the well/constituent pair considered to exceed its respective standard. No exceedances were noted for any of the well/constituent pairs. A summary of the confidence interval results follows this letter.

Thank you for the opportunity to assist you in the statistical analysis of groundwater quality for Amos Bottom Ash Pond. If you have any questions or comments, please feel free to contact me.

For Groundwater Stats Consulting,

Kristina Rayner

Kristina L. Rayner Groundwater Statistician

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Antimony, total Analysis Run 10/30/2018 5:20 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Antimony, total Analysis Run 10/30/2018 5:20 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Arsenic, total Analysis Run 10/30/2018 5:20 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Time Series

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Beryllium, total Analysis Run 10/30/2018 5:20 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Beryllium, total Analysis Run 10/30/2018 5:20 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Barium, total Analysis Run 10/30/2018 5:20 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Boron, total Analysis Run 10/30/2018 5:20 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Time Series

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Boron, total Analysis Run 10/30/2018 5:20 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Cadmium, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Cadmium, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Time Series

Constituent: Calcium, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Time Series

Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chloride, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Chloride, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Time Series

Constituent: Chromium, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Time Series

Constituent: Chromium, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Cobalt, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Cobalt, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Combined Radium 226 + 228 Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Combined Radium 226 + 228 Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Fluoride, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Fluoride, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Lead, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Lithium, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Lithium, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Time Series

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Mercury, total Analysis Run 10/30/2018 5:21 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Molybdenum, total Analysis Run 10/30/2018 5:22 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Molybdenum, total Analysis Run 10/30/2018 5:22 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Time Series

Constituent: pH, field Analysis Run 10/30/2018 5:22 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: pH, field Analysis Run 10/30/2018 5:22 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Selenium, total Analysis Run 10/30/2018 5:22 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Selenium, total Analysis Run 10/30/2018 5:22 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Sulfate, total Analysis Run 10/30/2018 5:22 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Time Series

Constituent: Sulfate, total Analysis Run 10/30/2018 5:22 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Thallium, total Analysis Run 10/30/2018 5:22 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Thallium, total Analysis Run 10/30/2018 5:22 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Total Dissolved Solids [TDS] Analysis Run 10/30/2018 5:22 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 10/30/2018 5:22 AM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Interwell Prediction Limit Summary Table - Significant Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 10/29/2018, 8:51 AM

Interwell Prediction Limit Summary Table - All Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 10/29/2018, 8:51 AM

Interwell Non-parametric

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 40 background values. 25% NDs. Annual per-constituent alpha = 0.01347. Individual comparison alpha = 0.001129 (1 of 2). Comparing 6 points to limit.

Constituent: Boron, total Analysis Run 10/29/2018 8:49 AM View: PL's - Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Exceeds Limit: BAP-MW-1, BAP-MW-1605, BAP-MW-1606

Prediction Limit Interwell Non-parametric

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 40 background values. Annual per-constituent alpha = 0.01347. Individual comparison alpha = 0.001129 (1 of 2). Comparing 6 points to limit.

> Constituent: Calcium, total Analysis Run 10/29/2018 8:49 AM View: PL's - Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 42 background values. Annual per-constituent alpha = 0.01255. Individual comparison alpha = 0.001052 (1 of 2). Comparing 6 points to limit.

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Exceeds Limit: BAP-MW-1, BAP-MW-1605, BAP-MW-1606

Prediction Limit Interwell Non-parametric

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 42 background values. 21.43% NDs. Annual perconstituent alpha = 0.01255. Individual comparison alpha = 0.001052 (1 of 2). Comparing 6 points to limit.

Background Data Summary: Mean=160.5, Std. Dev.=46.33, n=42. Normality test: Shapiro Wilk @alpha = 0.01,
calculated = 0.9476, critical = 0.922. Kappa = 1.926 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha =

Constituent: Total Dissolved Solids [TDS] Analysis Run 10/29/2018 8:49 AM View: PL's - Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Intrawell Prediction Limit Summary Table - Significant Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 10/30/2018, 10:43 AM

Intrawell Prediction Limit Summary Table - All Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 10/29/2018, 8:54 AM

Background Data Summary: Mean=0.04667, Std. Dev.=0.007071, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8049 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

> Constituent: Fluoride, total Analysis Run 10/29/2018 8:52 AM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limit

Prediction Limit Intrawell Non-parametric

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 8 background values. Well-constituent pair annual alpha $= 0.04242$. Individual comparison alpha = 0.02144 (1 of 2).

> Constituent: Fluoride, total Analysis Run 10/29/2018 8:52 AM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limit

Background Data Summary: Mean=0.2511, Std. Dev.=0.03408, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8781 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limit

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=0.05125, Std. Dev.=0.01727, n=8. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.919, critical = 0.749. Kappa = 2.831 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 8 background values. 62.5% NDs. Well-constituent pair annual alpha = 0.04242. Individual comparison alpha = 0.02144 (1 of 2).

> Constituent: Fluoride, total Analysis Run 10/29/2018 8:52 AM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limit

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=0.07111, Std. Dev.=0.02088, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.81, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

> Constituent: Fluoride, total Analysis Run 10/29/2018 8:52 AM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Within Limit

Background Data Summary (after Kaplan-Meier Adjustment): Mean=0.04556, Std. Dev.=0.02315, n=9, 33.33% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8602, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Within Limit

Prediction Limit

Intrawell Non-parametric

Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 8 background values. 87.5% NDs. Well-constituent pair annual alpha = 0.04242. Individual comparison alpha = 0.02144 (1 of 2).

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Prediction Limit Within Limit Intrawell Parametric 0.12 **BAP-MW-4 background** n 0.096 ◆ BAP-MW-4 compliance 0.072 $\frac{1}{2}$ $Limit = 0.1119$ 0.048 0.024 0 7/25/16 12/26/16 5/29/17 10/31/17 4/3/18 9/5/18

Background Data Summary: Mean=0.05111, Std. Dev.=0.02261, n=9, 11.11% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.854, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report a _lpha = 0.001254 .

> Constituent: Fluoride, total Analysis Run 10/29/2018 8:52 AM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

0.12 Prediction Limit Intrawell Parametric Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values. Within Limit

Background Data Summary (based on cube root transformation): Mean=0.351, Std. Dev.=0.04812, n=9, 11.11% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.7834, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254 .

> Constituent: Fluoride, total Analysis Run 10/29/2018 8:52 AM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Exceeds Limits

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=5.874, Std. Dev.=0.1176, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8865 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limits

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=6.588, Std. Dev.=0.2732, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9838 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

Background Data Summary: Mean=6.807, Std. Dev.=0.3098, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9809, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

> Constituent: pH, field Analysis Run 10/29/2018 8:52 AM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limits

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=5.987, Std. Dev.=0.2162, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.807 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

> Constituent: pH, field Analysis Run 10/29/2018 8:53 AM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limits

Prediction Limit Intrawell Non-parametric

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limits are highest and lowest of 9 background values. Well-constituent pair annual alpha = 0.07172 . Individual comparison alpha = 0.03619 (1 of 2).

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Exceeds Limits

Prediction Limit

Background Data Summary: Mean=6.213, Std. Dev.=0.08109, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9491 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

Background Data Summary: Mean=5.961, Std. Dev.=0.2895, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9339, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

> Constituent: pH, field Analysis Run 10/29/2018 8:53 AM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limits

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=5.503, Std. Dev.=0.1746, n=9. Normality test: Shapiro Wilk @alpha = 0.01, $cali = 0.8973$, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

> Constituent: pH, field Analysis Run 10/29/2018 8:53 AM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Exceeds Limits

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=5.71, Std. Dev.=0.2508, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8598 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limits

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=5.812, Std. Dev.=0.3162, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.7908, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

Trend Test Summary Table - Significant Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 10/29/2018, 8:59 AM

Trend Test Summary Table - All Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 10/29/2018, 8:59 AM

Constituent: Calcium, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Calcium, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Calcium, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Calcium, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Calcium, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Calcium, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Calcium, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chloride, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chloride, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Chloride, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Chloride, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chloride, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chloride, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Chloride, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: pH, field Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: pH, field Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: pH, field Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: pH, field Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: pH, field Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: pH, field Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Sulfate, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Sulfate, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Sulfate, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Sulfate, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP
Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Sulfate, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Sulfate, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Sulfate, total Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendix III Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Total Dissolved Solids [TDS] Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendi Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Total Dissolved Solids [TDS] Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendi Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendi Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendi Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Total Dissolved Solids [TDS] Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendi Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Total Dissolved Solids [TDS] Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendi Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 10/29/2018 8:57 AM View: Trend Tests - Appendi Amos BAP Client: Geosyntec Data: Amos BAP

Tolerance Limits - All Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 10/29/2018, 1:57 PM

Confidence Interval - All Results (No Significant Results)

Amos BAP Client: Geosyntec Data: Amos BAP Printed 10/29/2018, 2:10 PM

Confidence Interval - All Results (No Significant Results)

Amos BAP Client: Geosyntec Data: Amos BAP Printed 10/29/2018, 2:10 PM

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Antimony, total Analysis Run 10/29/2018 2:08 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Parametric Confidence Interval Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Arsenic, total Analysis Run 10/29/2018 2:08 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Beryllium, total Analysis Run 10/29/2018 2:08 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Cadmium, total Analysis Run 10/29/2018 2:08 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Chromium, total Analysis Run 10/29/2018 2:08 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Cobalt, total Analysis Run 10/29/2018 2:08 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Combined Radium 226 + 228 Analysis Run 10/29/2018 2:08 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Fluoride, total Analysis Run 10/29/2018 2:08 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Lead, total Analysis Run 10/29/2018 2:08 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

 Ω 0.01 0.02 0.03 0.04 0.05 Parametric Confidence Interval Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n. $\sum_{i=1}^{n}$ a martin yang berangan dan berang berang di dikenali di dikenali di dikenali di dikenali di dikenali di dikena
1981 - Salah S BAP-MW-1604 n=10 BAP-MW-4 n=10 sqrt(x) BAP-MW-5 n=10 sqrt(x) n=10 sqrt(x) Barat (x) sqrt(x) sqrt(x)
Sqrt(x) sqrt(x) sqrt(x $\frac{1}{2}$ $\frac{1}{2}$

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Lithium, total Analysis Run 10/29/2018 2:08 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Mercury, total Analysis Run 10/29/2018 2:08 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Molybdenum, total Analysis Run 10/29/2018 2:08 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Parametric and Non-Parametric (NP) Confidence Interval Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Selenium, total Analysis Run 10/29/2018 2:08 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.11e Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Thallium, total Analysis Run 10/29/2018 2:09 PM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

STATISTICAL ANALYSIS SUMMARY BOTTOM ASH POND Amos Plant Winfield, West Virginia

Submitted to

1 Riverside Plaza Columbus, Ohio 43215-2372

Submitted by

Geosyntec^D consultants

engineers | scientists | innovators

941 Chatham Lane Suite 103 Columbus, Ohio 43221

July 10, 2019

CHA8473

TABLE OF CONTENTS

LIST OF TABLES

LIST OF ATTACHMENTS

LIST OF ACRONYMS AND ABBREVIATIONS

- AEP American Electric Power
- ASD Alternative Source Demonstration
- BAP Bottom Ash Pond
- CCR Coal Combustion Residuals
- CCV Continuing Calibration Verification
- CFR Code of Federal Regulations
- GWPS Groundwater Protection Standard
- LCL Lower Confidence Limit
- LFB Laboratory Fortified Blanks
- LRB Laboratory Reagent Blanks
- MCL Maximum Contaminant Level
- NELAP National Environmental Laboratory Accreditation Program
- QA Quality Assurance
- QC Quality Control
- RSL Regional Screening Level
- SSI Statistically Significant Increase
- SSL Statistically Significant Level
- TDS Total Dissolved Solids
- UPL Upper Prediction Limit
- USEPA United States Environmental Protection Agency
- UTL Upper Tolerance Limit

SECTION 1

EXECUTIVE SUMMARY

In accordance with the United States Environmental Protection Agency's (USEPA's) regulations regarding the disposal of coal combustion residuals (CCR) in landfills and surface impoundments (40 CFR 257.90-257.98, "CCR rule"), groundwater monitoring has been conducted at the Bottom Ash Pond (BAP), an existing CCR unit at the Amos Power Plant located in Winfield, West Virginia.

Based on detection monitoring conducted in 2017 and 2018, statistically significant increases (SSIs) over background were concluded for calcium, chloride, total dissolved solids (TDS), and sulfate at the BAP. An alternative source was not identified at the time, so two assessment monitoring events were conducted at the BAP in 2018, in accordance with 40 CFR 257.95. No SSLs were identified during these events, and the unit remained in assessment monitoring. A semi-annual assessment monitoring event was also completed in March 2019, with the results of the March 2019 event documented in this report.

Groundwater data underwent several validation tests, including those for completeness, sample tracking accuracy, transcription errors, and consistent use of measurement units. No data quality issues were identified which would impact the usability of the data.

The monitoring data were submitted to Groundwater Stats Consulting, LLC for statistical analysis. Groundwater protection standards (GWPSs) were re-established for the Appendix IV parameters. Confidence intervals were calculated for Appendix IV parameters at the compliance wells to assess whether Appendix IV parameters were present at a statistically significant level (SSL) above the GWPS. No SSLs were identified, but Appendix III concentrations for boron, calcium, chloride, pH, sulfate, and TDS remained above background. Thus, either the unit will remain in assessment monitoring or an alternative source demonstration (ASD) will be conducted to evaluate if the unit can return to detection monitoring. Certification of the selected statistical methods by a qualified professional engineer is documented in Attachment A.

SECTION 2

BOTTOM ASH POND EVALUATION

2.1 Data Validation & QA/QC

During the assessment monitoring program, one set of samples was collected for analysis from each upgradient and downgradient well to meet the requirements of 40 CFR 257.95(d)(1). Samples from the March 2019 semi-annual sampling event were analyzed for the Appendix III and Appendix IV parameters detected during the 40 CFR 257.95(b) event completed in May 2018. A summary of data collected during this assessment monitoring event may be found in Table 1.

Chemical analysis was completed by an analytical laboratory certified by the National Environmental Laboratory Accreditation Program (NELAP). Quality assurance and quality control (QA/QC) samples completed by the analytical laboratory included the use of laboratory reagent blanks (LRBs), continuing calibration verification (CCV) samples, and laboratory fortified blanks (LFBs).

The analytical data were imported into a Microsoft Access database, where checks were completed to assess the accuracy of sample location identification and analyte identification. Where necessary, unit conversions were applied to standardize reported units across all sampling events. Exported data files were created for use with the Sanitas™ v.9.6.14 statistics software. The export file was checked against the analytical data for transcription errors and completeness. No QA/QC issues were noted which would impact data usability.

2.2 Statistical Analysis

Statistical analyses for the BAP were conducted in accordance with the January 2017 *Statistical Analysis Plan* (AEP, 2017). Time series plots and results for all completed statistical tests are provided in Attachment B.

The data obtained to meet the requirements of 40 CFR 257.95(d)(1) were screened for potential outliers. No outliers were identified.

2.2.1 Establishment of GWPSs

A GWPS was established for each Appendix IV parameter in accordance with 40 CFR 257.95(h) and the *Statistical Analysis Plan* (AEP, 2017). The established GWPS was determined to be the greater value of the background concentration and the maximum contaminant level (MCL) or riskbased level specified in 40 CFR 257.95(h)(2) for each Appendix IV parameter. To determine background concentrations, an upper tolerance limit (UTL) was calculated using pooled data from the background wells collected during the background monitoring and assessment monitoring events. Generally, tolerance limits were calculated parametrically with 95% coverage and 95% confidence. Non-parametric tolerance limits were calculated for arsenic, cadmium, fluoride,

selenium, and thallium due to apparent non-normal distributions and for mercury due to a high non-detect frequency. Tolerance limits and the final GWPSs are summarized in Table 2.

2.2.2 Evaluation of Potential Appendix IV SSLs

A confidence interval was constructed for each Appendix IV parameter at each compliance well. Confidence limits were generally calculated parametrically ($\alpha = 0.01$); however, non-parametric confidence limits were calculated in some cases (e.g., when the data did not appear to be normally distributed or when the non-detect frequency was too high). An SSL was concluded if the lower confidence limit (LCL) exceeded the GWPS (i.e., if the entire confidence interval exceeded the GWPS). Calculated confidence limits are shown in Attachment B.

No SSLs were identified at the Amos BAP.

2.2.3 Evaluation of Potential Appendix III SSIs

The CCR rule allows CCR units to move from assessment monitoring to detection monitoring if all Appendix III and Appendix IV parameters are at or below background levels for two consecutive sampling events [40 CFR 257.95(e)]. Since no Appendix IV SSLs were identified, Appendix III results were analyzed to assess whether concentrations of Appendix III parameters at the compliance wells exceeded background concentrations.

Prediction limits were calculated for the Appendix III parameters to represent background values. As described in the January 2018 *Statistical Analysis Summary* report (Geosyntec, 2018), intrawell tests were used to evaluate potential SSIs for fluoride and pH, whereas interwell tests were used to evaluate potential SSIs for boron, calcium, chloride, sulfate, and TDS.

Prediction limits for the interwell tests were recalculated using data collected during the March 2019 assessment monitoring event. Four data points (i.e., one samples from four background wells) were added to the background dataset for each interwell test. New data were tested for outliers prior to being added to the background dataset. The updated prediction limits were calculated for a one-of-two retesting procedure, as during detection monitoring. The values of the updated prediction limits were similar to the values of the prediction limits calculated during detection monitoring. The revised interwell prediction limits were used to evaluate potential SSIs for boron, calcium, chloride, sulfate, and TDS.

For the intrawell tests, limited data made it possible to add only one data point (i.e., one sample from each compliance well) to each background dataset. Because one sample result is insufficient to compare against the existing background dataset, the prediction limits were not updated for the intrawell tests at this time. The intrawell prediction limits calculated during detection monitoring were used to evaluate potential SSIs for fluoride and pH.

Data collected during the September 2018 and March 2019 assessment monitoring events from each compliance well were compared to the prediction limits to evaluate if results were above

background values. The results from this event and the prediction limits are summarized in Table 3. The following exceedances of the upper prediction limits (UPLs) were noted:

- Boron concentrations exceeded the interwell UPL of 0.183 mg/L at MW-1 (0.20 mg/L), MW-1604 (<0.2 mg/L), MW-1605 (<0.2 mg/L), MW-1606 (<0.2 mg/L), MW-4 (<0.2 mg/L), and MW-4 (< 0.2 mg/L). However, boron was not detected at any of these wells except for MW-1, and so is reported as the method detection limit (0.2 mg/L).
- Calcium concentrations exceeded the interwell UPL of 19.6 mg/L at MW-1 (38.3 mg/L and 38.4 mg/L), MW-1605 (49.4 mg/L and 45.4 mg/L), and MW-1606 (51.7 mg/L and 59.0 mg/L).
- Chloride concentrations exceeded the interwell UPL of 41.0 mg/L at MW-1 (67.9 mg/L and 55.2 mg/L), MW-1605 (97.1 mg/L and 92.5 mg/L), and MW-1606 (133 mg/L and 157 mg/L).
- pH exceeded the intrawell background value (UPL) of 6.4 SU at MW-1604 (7.2 SU) and MW-4 (7.0 SU) during the September 2018 event.
- Sulfate concentrations exceeded the interwell UPL of 57.4 mg/L at MW-1 (145 mg/L and 138 mg/L), MW-1605 (213 mg/L and 222 mg/L), and MW-1606 (202 mg/L and 232 mg/L).
- TDS concentrations exceeded the interwell UPL of 253 mg/L at MW-1 (338 mg/L and 321) mg/L), MW-1605 (483 mg/L and 507 mg/L), and MW-1606 (507 mg/L and 597 mg/L).

Based on these results, concentrations of Appendix III parameters exceeded background levels at compliance wells at the Amos BAP during assessment monitoring. As a result, the Amos BAP CCR unit will remain in assessment monitoring.

2.3 Conclusions

A semi-annual assessment monitoring event was conducted in accordance with the CCR Rule. The laboratory and field data were reviewed prior to statistical analysis, with no QA/QC issues identified that impacted data usability. A review of outliers identified no potential outliers in the March 2019 data. GWPSs were re-established for the Appendix IV parameters. A confidence interval was constructed at each compliance well for each Appendix IV parameter; SSLs were concluded if the entire confidence interval exceeded the GWPS. No SSLs were identified.

The Appendix III results were evaluated to assess whether concentrations of Appendix III parameters exceeded background levels. Interwell tests were used to evaluate potential SSIs for boron, calcium, chloride, sulfate, and TDS, and intrawell tests were used to evaluate potential SSIs for fluoride and pH. The prediction limits for the interwell tests were updated with additional data collected from the background wells. Prediction limits were recalculated using a one-of-two retesting procedure. The prediction limits calculated during detection monitoring were used for the intrawell tests. Boron, calcium, chloride, pH, sulfate, and TDS results exceeded background levels.

Based on this evaluation, either the Amos BAP CCR unit will remain in assessment monitoring or an ASD will be conducted to evaluate if the unit can return to detection monitoring.

SECTION 3

REFERENCES

American Electric Power (AEP). 2017. Statistical Analysis Plan – Amos Plant. January 2017.

Geosyntec Consultants (Geosyntec). 2018. Statistical Analysis Summary – Bottom Ash Pond, John E. Amos Plant, Winfield, West Virginia. January 15, 2018.

TABLES

Table 1 - Groundwater Data Summary Amos - Bottom Ash Pond

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. For statistical analysis, parameters which were not detected were replaced with the reporting limit.

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not analyzed

Table 2: Groundwater Protection Standards Amos Plant - Bottom Ash Pond

Notes:

Grey cell indicates calculated UTL is higher than MCL.

MCL = Maximum Contaminant Level

Calculated UTL (Upper Tolerance Limit) represents site-specific background values.

The higher of the calculated UTL or MCL/Rule-Specified Level is used as the GWPS.

Table 3: Appendix III Data SummaryAmos Plant - Bottom Ash Pond

Geosyntec Consultants, Inc.

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

*: < represents a value below the method detection limit.

-: Not Sampled

Bold values exceed the background value.

Background values are shaded gray.

ATTACHMENT A Certification by Qualified Professional Engineer

Certification by Qualified Professional Engineer

I certify that the selected and above described statistical method is appropriate for evaluating the groundwater monitoring data for the Amos Bottom Ash Pond CCR management area and that the requirements of 40 CFR 257.93(f) have been met.

DAVID ANTHONY MILLER

Printed Name of Licensed Professional Engineer

Savid Anthony Miller

Signature

22663

WEST VIRGINIA

annunga. 22663

07.10.19

Date

License Number

Licensing State

ATTACHMENT B Statistical Analysis Output

GROUNDWATER STATS CONSULTING

July 9, 2019

Geosyntec Consultants Attn: Ms. Allison Kreinberg 941 Chatham Lane, #103 Columbus, OH 43221

Re: Amos Bottom Ash Pond Assessment Monitoring Event – March 2019

Dear Ms. Kreinberg,

Groundwater Stats Consulting (GSC), formerly the statistical consulting division of Sanitas Technologies, is pleased to provide the evaluation of groundwater data for the March 2019 Assessment Monitoring event for American Electric Power Company's Amos Bottom Ash Pond. The analysis complies with the federal rule for the Disposal of Coal Combustion Residuals from Electric Utilities (CCR Rule, 2015) as well as with the USEPA Unified Guidance (2009).

Sampling began at the site for the CCR program in 2016. The monitoring well network, as provided by Geosyntec Consultants, consists of the following:

- o Upgradient wells: BAP-MW-1601, BAP-MW-1602A, BAP-MW-1603A, and BAP-MW-6; and
- o Downgradient wells: BAP-MW-1, BAP-MW-1604, BAP-MW-1605, BAP-MW-1606, BAP-MW-4, and BAP-MW-5.

Data were sent electronically, and the statistical analysis was conducted according to the Statistical Analysis Plan and screening evaluation prepared by GSC and approved by Dr. Kirk Cameron, PhD Statistician with MacStat Consulting, primary author of the USEPA Unified Guidance, and Senior Advisor to GSC.

The CCR program consists of the following constituents:

- o **Appendix III** (Detection Monitoring) boron, calcium, chloride, fluoride, pH, sulfate, and TDS;
- o Appendix IV (Assessment Monitoring) antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, combined radium 226 + 228, fluoride, lead, lithium, mercury, molybdenum, selenium, and thallium.

Time series plots for Appendix III and IV parameters are provided for all wells and constituents; and are used to evaluate concentrations over the entire record (Figure A). Values in background which have previously been flagged as outliers may be seen in a lighter font and disconnected symbol on the graphs. Additionally, a summary of flagged values follows this letter (Figure B).

Evaluation of Appendix III Parameters

Interwell prediction limits combined with a 1-of-2 verification strategy were constructed for boron, calcium, chloride, sulfate and TDS; and intrawell prediction limits combined with a 1-of-2 verification strategy were constructed for fluoride and pH (Figures C and D, respectively). The statistical method selected for each parameter was determined based on the results of the evaluation performed in December 2017; and all proposed background data were screened for outliers and trends at that time. The findings of those reports were submitted with that analysis.

Interwell prediction limits utilize all upgradient well data for construction of statistical limits. During each sample event, upgradient well data are screened for any newly suspected outliers or obvious trending patterns using time series plots. All values flagged as outliers may be seen on the Outlier Summary report following this letter. No obvious trending patterns were observed in the upgradient wells.

Intrawell prediction limits utilize the background data set that was originally screened in 2017. As recommended in the EPA Unified Guidance (2009), the background data set will be tested for the purpose of updating statistical limits using the Mann-Whitney twosample test when an additional four to eight measurements are available.

In the event of an initial exceedance of compliance well data, the 1-of-2 resample plan allows for collection of one additional sample to determine whether the initial exceedance is confirmed. When the resample confirms the initial exceedance, a statistically significant increase (SSI) is identified, and further research would be required to identify the cause of the exceedance (i.e. impact from the site, natural variation, or an

off-site source). If the resample falls within the statistical limit, the initial exceedance is considered a false positive result, and, therefore, no further action is necessary.

Prediction limit exceedances were noted for calcium, sulfate and TDS in at least one downgradient well. The results of those findings may be found in the Prediction Limit Summary tables following this letter.

When a statistically significant increase is identified, the data are further evaluated using the Sen's Slope/Mann Kendall trend test to determine whether data are statistically increasing, decreasing or stable (Figure E). Upgradient wells are included to determine whether similar patterns exist upgradient of the facility which is an indication of naturally changing groundwater. Statistically significant increasing trends were found for chloride in upgradient well BAP-MW-1601 and in downgradient well BAP-MW-1606; and for total dissolved solids in downgradient well BAP-MW-1606. The Trend Test Summary Table follows this letter.

Evaluation of Appendix IV Parameters

Interwell Tolerance limits were used to calculate background limits from all available pooled upgradient well data for Appendix IV parameters to determine the Alternate Contaminant Level (ACL) for each constituent (Figure F). Background data are screened for outliers and extreme trending patterns that would lead to artificially elevated statistical limits. Any flagged values may be seen on the Outlier Summary following this letter.

Parametric limits use a target of 95% confidence and 95% coverage. The confidence and coverage levels for nonparametric tolerance limits are dependent upon the number of background samples. These limits were compared to the Maximum Contaminant Levels (MCLs) and CCR-Rule specified levels in the Groundwater Protection Standard (GWPS) table following this letter to determine the highest limit for use as the GWPS in the Confidence Interval comparisons (Figure G).

Confidence intervals were then constructed on downgradient wells for each of the Appendix IV parameters using the highest limit of either the MCL, CCR-Rule specified levels, or background as discussed above (Figure H). Only when the entire confidence interval is above a GWPS is the well/constituent pair considered to exceed its respective standard. No exceedances were noted for any of the well/constituent pairs. A summary of the confidence interval results follows this letter.

Thank you for the opportunity to assist you in the statistical analysis of groundwater quality for Amos Bottom Ash Pond. If you have any questions or comments, please feel free to contact me.

For Groundwater Stats Consulting,

Kristina Rayner

Kristina L. Rayner, Groundwater Statistician

FIGURE A: TIME SERIES

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Antimony, total Analysis Run 7/8/2019 4:28 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Time Series

Constituent: Arsenic, total Analysis Run 7/8/2019 4:28 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Barium, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Beryllium, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Boron, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Cadmium, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Calcium, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Chloride, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

0.004 \triangleleft BAP-MW-1601 (bg) $BAP-MW-1602A (bg)$ 0.0032 ● BAP-MW-1603A (bg) \blacktriangle BAP-MW-6 (bg) $\overline{}$ BAP-MW-1 0.0024 BAP-MW-1604 \mathbb{R} and \mathbb{R} and BAP-MW-1605 0.0016 BAP-MW-1606 \bullet BAP-MW-4 $\overline{\mathbf{v}}$ BAP-MW-5 0.0008 Ω

Time Series

Constituent: Chromium, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

7/25/16 2/3/17 8/15/17 2/25/18 9/6/18 3/19/19

Time Series

Constituent: Cobalt, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Combined Radium 226 + 228 Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Fluoride, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Lead, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Lithium, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Mercury, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Molybdenum, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Selenium, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Sulfate, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Thallium, total Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 7/8/2019 4:29 PM View: Descriptive Amos BAP Client: Geosyntec Data: Amos BAP

FIGURE B: OUTLIER SUMMARY

Outlier Summary

COULT SUMMATY

Amos BAP Client: Geosyntec Data: Amos BAP Printed 7/8/2019, 4:01 PM

S26 + 228 (pCil).

26 + 228 (pCil).

26 + 228 (pCil).

pluned Radium 226 + 228 (pCil).

pluned Radium 226 + 228 (pCil).

BAPAMY-1 Selept

FIGURE C: INTERWELL PREDICTION LIMITS

Interwell Prediction Limit Summary - Significant Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 6/24/2019, 2:34 PM

Interwell Prediction Limit Summary - All Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 6/24/2019, 2:34 PM

Interwell Non-parametric

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 44 background values. 27.27% NDs. Annual perconstituent alpha = 0.01162. Individual comparison alpha = 0.0009736 (1 of 2). Comparing 6 points to limit.

Constituent: Boron, total Analysis Run 6/24/2019 2:31 PM View: PL's - Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Exceeds Limit: BAP-MW-1, BAP-MW-1605, BAP-MW-1606

Prediction Limit Interwell Non-parametric

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 44 background values. Annual per-constituent alpha = 0.01162. Individual comparison alpha = $0.0009736(1$ of 2). Comparing 6 points to limit.

> Constituent: Calcium, total Analysis Run 6/24/2019 2:31 PM View: PL's - Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Exceeds Limit: BAP-MW-1, BAP-MW-1605,

BAP-MW-1606

Prediction Limit

Interwell Non-parametric

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 46 background values. Annual per-constituent alpha = 0.0107. Individual comparison alpha = 0.0008958 (1 of 2). Comparing 6 points to limit.

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Exceeds Limit: BAP-MW-1, BAP-MW-1605, BAP-MW-1606

Prediction Limit Interwell Non-parametric

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 46 background values. 21.74% NDs. Annual perconstituent alpha = 0.0107. Individual comparison alpha = 0.0008958 (1 of 2). Comparing 6 points to limit.

Background Data Summary: Mean=162.3, Std. Dev.=47.56, n=46. Normality test: Shapiro Wilk @alpha = 0.01,
calculated = 0.9397, critical = 0.927. Kappa = 1.913 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha =

Constituent: Total Dissolved Solids [TDS] Analysis Run 6/24/2019 2:32 PM View: PL's - Interwell Amos BAP Client: Geosyntec Data: Amos BAP

FIGURE D: INTRAWELL PREDICTION LIMITS

Intrawell Prediction Limit Summary - All Results (No Significant)

Amos BAP Client: Geosyntec Data: Amos BAP Printed 7/8/2019, 4:20 PM

Prediction Limit Within Limit Intrawell Parametric 0.07 BAP-MW-1601 П background 0.056 BAP-MW-1601 compliance 0.042 $\frac{1}{2}$ 0.042 M is an and the set of $Limit = 0.06569$ 0.028 0.014 0 7/26/16 2/4/17 8/16/17 2/25/18 9/6/18 3/19/19

Background Data Summary: Mean=0.04667, Std. Dev.=0.007071, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8049 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

> Constituent: Fluoride, total Analysis Run 7/8/2019 4:17 PM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limit

Prediction Limit Intrawell Non-parametric

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 8 background values. Well-constituent pair annual alpha $= 0.04242$. Individual comparison alpha = 0.02144 (1 of 2).

> Constituent: Fluoride, total Analysis Run 7/8/2019 4:17 PM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

0

0.08 0.16

0.24 0.32 0.4

Within Limit

Prediction Limit Intrawell Parametric п mg/L

Limit = 0.3428

BAP-MW-1603A background

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=0.05125, Std. Dev.=0.01727, n=8. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.919, critical = 0.749. Kappa = 2.831 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

7/26/16 2/3/17 8/14/17 2/23/18 9/3/18 3/15/19

Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 8 background values. 62.5% NDs. Well-constituent pair annual alpha = 0.04242. Individual comparison alpha = 0.02144 (1 of 2).

> Constituent: Fluoride, total Analysis Run 7/8/2019 4:17 PM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limit

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=0.07111, Std. Dev.=0.02088, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.81, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

> Constituent: Fluoride, total Analysis Run 7/8/2019 4:17 PM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Within Limit

Background Data Summary (after Kaplan-Meier Adjustment): Mean=0.04556, Std. Dev.=0.02315, n=9, 33.33% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8602, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

Prediction Limit

Intrawell Non-parametric

Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 8 background values. 87.5% NDs. Well-constituent pair annual alpha = 0.04242. Individual comparison alpha = 0.02144 (1 of 2).

Background Data Summary (based on natural log transformation): Mean=-2.972, Std. Dev.=0.5846, n=9, 11.11% NDs. Normality test: Shapiro Wilk @alpha = 0.01 , calculated = 0.8153 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

> Constituent: Fluoride, total Analysis Run 7/8/2019 4:17 PM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Prediction Limit Intrawell Non-parametric Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values. Within Limit

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 9 background values. 11.11% NDs. Well-constituent pair annual alpha = 0.03586 . Individual comparison alpha = 0.01809 (1 of 2).

> Constituent: Fluoride, total Analysis Run 7/8/2019 4:17 PM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limits

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=5.874, Std. Dev.=0.1176, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8865 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limits

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=6.588, Std. Dev.=0.2732, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9838 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

Background Data Summary: Mean=6.807, Std. Dev.=0.3098, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9809, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

> Constituent: pH, field Analysis Run 7/8/2019 4:18 PM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limits

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=5.987, Std. Dev.=0.2162, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.807 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

> Constituent: pH, field Analysis Run 7/8/2019 4:18 PM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limits

Prediction Limit Intrawell Non-parametric

BAP-MW-1 background

 $Limit = 4.9$

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=6.213, Std. Dev.=0.08109, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9491 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limits are highest and lowest of 9 background values. Well-constituent pair annual alpha = 0.07172 . Individual comparison alpha = 0.03619 (1 of 2).

Background Data Summary: Mean=5.961, Std. Dev.=0.2895, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9339, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

> Constituent: pH, field Analysis Run 7/8/2019 4:18 PM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limits

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=5.503, Std. Dev.=0.1746, n=9. Normality test: Shapiro Wilk @alpha = 0.01, $cali = 0.8973$, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

> Constituent: pH, field Analysis Run 7/8/2019 4:18 PM View: PL's - Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limits

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=5.71, Std. Dev.=0.2508, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8598 , critical = 0.764 . Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Within Limits

Prediction Limit Intrawell Parametric

Background Data Summary: Mean=5.812, Std. Dev.=0.3162, n=9. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.7908, critical = 0.764. Kappa = 2.69 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254.

FIGURE E: TREND TESTS

Trend Test Summary Table - Significant Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 7/8/2019, 4:12 PM

Trend Test Summary Table - All Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 7/8/2019, 4:12 PM

Constituent: Calcium, total Analysis Run 7/8/2019 4:07 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Calcium, total Analysis Run 7/8/2019 4:07 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Calcium, total Analysis Run 7/8/2019 4:07 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Calcium, total Analysis Run 7/8/2019 4:07 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Amos BAP Client: Geosyntec Data: Amos BAP

Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Calcium, total Analysis Run 7/8/2019 4:07 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chloride, total Analysis Run 7/8/2019 4:07 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Amos BAP Client: Geosyntec Data: Amos BAP

Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Chloride, total Analysis Run 7/8/2019 4:07 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chloride, total Analysis Run 7/8/2019 4:07 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Chloride, total Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Sulfate, total Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Sulfate, total Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Sulfate, total Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Sulfate, total Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Sulfate, total Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Sulfate, total Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Total Dissolved Solids [TDS] Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.18 Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Total Dissolved Solids [TDS] Analysis Run 7/8/2019 4:08 PM View: Trend Tests Amos BAP Client: Geosyntec Data: Amos BAP

FIGURE F: TOLERANCE LIMITS

Tolerance Limit Summary Table

Amos BAP Client: Geosyntec Data: Amos BAP Printed 5/28/2019, 11:44 AM

95% coverage. Background Data Summary (based on cube root transformation): Mean=0.03269, Std. Dev.=0.007742, n=44, 11.36% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9335, critical = 0.924. Report alpha = 0.05 .

Tolerance Limit

Interwell Non-parametric

Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 44 background values. 90.04% coverage at alpha=0.01; 93.55% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1047.

> Constituent: Arsenic, total Analysis Run 5/28/2019 11:42 AM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Tolerance Limit

Interwell Parametric

95% coverage. Background Data Summary (based on square root transformation): Mean=0.006345, Std. Dev.=0.001816, n=44, 2.273% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9689, critical = 0.924. Report alpha = 0.05 .

0

Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 44 background values. 11.36% NDs. 90.04% coverage at alpha=0.01; 93.55% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1047.

3/18/19 3/19/19

Constituent: Cadmium, total Analysis Run 5/28/2019 11:42 AM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Tolerance Limit

Interwell Parametric

95% coverage. Background Data Summary (based on square root transformation): Mean=0.02931, Std. Dev.=0.01029, n=44. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9802, critical = 0.924. Report alpha $= 0.05.$

Constituent: Chromium, total Analysis Run 5/28/2019 11:42 AM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Tolerance Limit Interwell Parametric

95% coverage. Background Data Summary (based on natural log transformation): Mean=-0.01249, Std. Dev.=0.7507, n=46. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9504, critical = 0.927. Report alpha = 0.05.

Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 46 background values. 2.174% NDs. 90.43% coverage at alpha=0.01; 93.55% coverage at alpha=0.05; 98.63% coverage at alpha=0.5. Report alpha = 0.09447.

Constituent: Fluoride, total Analysis Run 5/28/2019 11:42 AM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Tolerance Limit

Tolerance Limit

Interwell Parametric

95% coverage. Background Data Summary (based on cube root transformation): Mean=0.09729, Std. Dev.=0.0419, n=44. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9386, critical = 0.924. Report alpha = 0.05.

> Constituent: Lead, total Analysis Run 5/28/2019 11:42 AM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

95% coverage. Background Data Summary (based on natural log transformation) (after Kaplan-Meier Adjustment): Mean=-6.947, Std. Dev.=1.248, n=44, 18.18% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.932, $critical = 0.924$. Report alpha = 0.05 .

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Tolerance Limit

Interwell Non-parametric

Non-parametric test used in lieu of parametric tolerance limit because censored data exceeded 75%. Limit is highest of 36 background values. 88.89% NDs. 88.09% coverage at alpha=0.01; 91.99% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1578.

95% coverage. Background Data Summary (based on square root transformation): Mean=0.02938, Std. Dev.=0.01152, n=44, 2.273% NDs. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9725, critical = 0.924. Report alpha = 0.05 .

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Tolerance Limit

Interwell Non-parametric

Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 44 background values. 2.273% NDs. 90.04% coverage at alpha=0.01; 93.55% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1047.

Constituent: Molybdenum, total Analysis Run 5/28/2019 11:42 AM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Tolerance Limit

Constituent: Selenium, total Analysis Run 5/28/2019 11:43 AM View: UTL's - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Non-parametric test used in lieu of parametric tolerance limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 44 background values. 15.91% NDs. 90.04% coverage at alpha=0.01; 93.55% coverage at alpha=0.05; 98.24% coverage at alpha=0.5. Report alpha = 0.1047.

FIGURE G: GROUNDWATER PROTECTION STANDARDS

Grey cell indicates Background is higher than MCL.

MCL = Maximum Contaminant Level

GWPS - Groundwater Protection Standard

FIGURE H: CONFIDENCE INTERVALS

Confidence Interval Summary Table - All Results (No Significant Results)

Amos BAP Client: Geosyntec Data: Amos BAP Printed 5/28/2019, 11:56 AM

Confidence Interval Summary Table - All Results (No Significant Results)

Amos BAP Client: Geosyntec Data: Amos BAP Printed 5/28/2019, 11:56 AM

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Antimony, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Parametric Confidence Interval

Parametric Confidence Interval Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Arsenic, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

0 0.6 1.2 1.8 2.4 3 Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n. $\sum_{i=1}^{n}$ a a mana a m
Tanàna a mana a man n=11 Barat and the content of the c
Instruction of the content of the c n Baparaman Baparaman n=19 Barat San Barat
19 An am Aonaich ann an 19 an t-ainm an —— Limit = 2

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Barium, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Beryllium, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Cadmium, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Chromium, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Constituent: Cobalt, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Combined Radium 226 + 228 Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Fluoride, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Lead, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Lithium, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Mercury, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Molybdenum, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Parametric and Non-Parametric (NP) Confidence Interval Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Selenium, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.14 Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Thallium, total Analysis Run 5/28/2019 11:53 AM View: Confidence Intervals - App IV Amos BAP Client: Geosyntec Data: Amos BAP

STATISTICAL ANALYSIS SUMMARY BOTTOM ASH POND Amos Plant Winfield, West Virginia

Submitted to

1 Riverside Plaza Columbus, Ohio 43215-2372

Submitted by

Geosyntec^D consultants

engineers | scientists | innovators

941 Chatham Lane Suite 103 Columbus, Ohio 43221

December 23, 2019

CHA8473

TABLE OF CONTENTS

LIST OF TABLES

LIST OF ATTACHMENTS

LIST OF ACRONYMS AND ABBREVIATIONS

- AEP American Electric Power
- ASD Alternative Source Demonstration
- BAP Bottom Ash Pond
- CCR Coal Combustion Residuals
- CCV Continuing Calibration Verification
- CFR Code of Federal Regulations
- GWPS Groundwater Protection Standard
- LCL Lower Confidence Limit
- LFB Laboratory Fortified Blanks
- LRB Laboratory Reagent Blanks
- MCL Maximum Contaminant Level
- NELAP National Environmental Laboratory Accreditation Program
- QA Quality Assurance
- QC Quality Control
- SSI Statistically Significant Increase
- SSL Statistically Significant Level
- SU Standard Units
- TDS Total Dissolved Solids
- UPL Upper Prediction Limit
- USEPA United States Environmental Protection Agency
- UTL Upper Tolerance Limit

SECTION 1

EXECUTIVE SUMMARY

In accordance with the United States Environmental Protection Agency's (USEPA's) regulations regarding the disposal of coal combustion residuals (CCR) in landfills and surface impoundments (40 CFR 257.90-257.98, "CCR rule"), groundwater monitoring has been conducted at the Bottom Ash Pond (BAP), an existing CCR unit at the Amos Power Plant located in Winfield, West Virginia.

Based on detection monitoring conducted in 2017 and 2018, statistically significant increases (SSIs) over background were concluded for calcium, chloride, total dissolved solids (TDS), and sulfate at the BAP. An alternative source was not identified following the detection monitoring events, so the BAP has been in assessment monitoring since 2018. During the first 2019 assessment monitoring event, completed in March 2019, no statistically significant levels (SSLs) were identified and the unit remained in assessment monitoring. Two additional assessment monitoring events were conducted at the BAP in June 2019 and July 2019, in accordance with 40 CFR 257.95. The statistical summary of the results of the March 2019 sampling event was completed under a separate cover (Geosyntec, 2019). Only the results of the June and July assessment events are documented in this report.

Prior to conducting the statistical analyses, the groundwater data underwent several validation tests, including those for completeness, sample tracking accuracy, transcription errors, and consistent use of measurement units. No data quality issues were identified which would impact the usability of the data.

The monitoring data were submitted to Groundwater Stats Consulting, LLC for statistical analysis. Groundwater protection standards (GWPSs) were re-established for the Appendix IV parameters. Confidence intervals were calculated for Appendix IV parameters at the compliance wells to assess whether Appendix IV parameters were present at concentrations above the GWPS. No SSLs were identified. Prediction limits were recalculated for Appendix III parameters. When compared to the revised prediction limits, concentrations for calcium, chloride, pH, sulfate, and TDS remained above background. Some pH values were also below background. Thus, either the unit will remain in assessment monitoring or an alternative source demonstration (ASD) will be conducted to evaluate if the unit can return to detection monitoring. Certification of the selected statistical methods by a qualified professional engineer is documented in Attachment A.

SECTION 2

BOTTOM ASH POND EVALUATION

2.1 Data Validation & QA/QC

During the assessment monitoring program, two sets of samples were collected for analysis from each upgradient and downgradient well to meet the requirements of 40 CFR 257.95(b) (June 2019) and 257.95(d)(1) (July 2019). Samples from the June 2019 event were analyzed for all Appendix III and Appendix IV parameters. Samples from the July 2019 event were not analyzed for mercury, as it was not detected at any locations during the June event. A summary of data collected during these assessment monitoring events may be found in Table 1.

Chemical analysis was completed by an analytical laboratory certified by the National Environmental Laboratory Accreditation Program (NELAP). Quality assurance and quality control (QA/QC) samples completed by the analytical laboratory included the use of laboratory reagent blanks (LRBs), continuing calibration verification (CCV) samples, and laboratory fortified blanks (LFBs).

The analytical data were imported into a Microsoft Access database, where checks were completed to assess the accuracy of sample location identification and analyte identification. Where necessary, unit conversions were applied to standardize reported units across all sampling events. Exported data files were created for use with the Sanitas™ v.9.6.23 statistics software. The export file was checked against the analytical data for transcription errors and completeness. No QA/QC issues were noted which would impact data usability.

2.2 Statistical Analysis

Statistical analyses for the BAP were conducted in accordance with the January 2017 *Statistical Analysis Plan* (AEP, 2017), except where noted below. Time series plots and results for all completed statistical tests are provided in Attachment B.

The data obtained in June and July 2019 were screened for potential outliers. Outliers were identified for pH at MW-1, MW-1601, MW-1602A, MW-1603A, MW-1604, and MW-6 in June 2019. The presence of multiple anomalously high pH values during the same event suggests field instrumentation error and these values were removed from the dataset. Outliers were also identified for beryllium at MW-1604 and selenium at MW-6 for the June 2019 event and these values were removed from the dataset.

2.2.1 Establishment of GWPSs

A GWPS was established for each Appendix IV parameter in accordance with 40 CFR 257.95(h) and the *Statistical Analysis Plan* (AEP, 2017). The established GWPS was determined to be the greater value of the background concentration and the maximum contaminant level (MCL) or riskbased level specified in 40 CFR 257.95(h)(2) for each Appendix IV parameter. To determine background concentrations, an upper tolerance limit (UTL) was calculated using pooled data from the background wells collected during the background monitoring and assessment monitoring events. Generally, tolerance limits were calculated parametrically with 95% coverage and 95% confidence. Non-parametric tolerance limits were calculated for antimony, arsenic, cadmium, combined radium, fluoride, selenium, and thallium due to apparent non-normal distributions and for mercury due to a high non-detect frequency. Tolerance limits and the final GWPSs are summarized in Table 2.

2.2.2 Evaluation of Potential Appendix IV SSLs

A confidence interval was constructed for each Appendix IV parameter at each compliance well. Confidence limits were generally calculated parametrically $(\alpha = 0.01)$; however, non-parametric confidence limits were calculated in some cases (e.g., when the data did not appear to be normally distributed or when the non-detect frequency was too high). An SSL was concluded if the lower confidence limit (LCL) exceeded the GWPS (i.e., if the entire confidence interval exceeded the GWPS). Calculated confidence limits are shown in Attachment B.

No SSLs were identified at the Amos BAP.

2.2.3 Establishment of Appendix III Prediction Limits

Upper prediction limits (UPL) were previously established for all Appendix III parameters following the background monitoring period (Geosyntec, 2018). Intrawell tests were used to evaluate potential SSIs for fluoride and pH, whereas interwell tests were used to evaluate potential SSIs for boron, calcium, chloride, sulfate, and TDS. While interwell prediction limits have been updated periodically during the assessment monitoring period as sufficient data became available, this represents the first update to the background dataset for parameters evaluated using intrawell tests.

Mann-Whitney (Wilcoxon rank-sum) tests were performed to determine whether the newer data are affected by a release from the BAP. Because the interwell Appendix III limits and the Appendix IV GWPSs are based on data from upgradient wells which we would not expect to have been impacted by a release, these tests were used for intrawell Appendix III tests only. Mann-Whitney tests were used to compare the medians of historical data (July 2016 - October 2017) to the new compliance samples (November 2017 – March 2019) for fluoride and pH. Results were evaluated to determine if the medians of the two groups were similar at the 99% confidence level. Where no significant difference was found, the new compliance data were added to the background dataset. Where a statistically significant difference was found between the medians of the two groups, the data were reviewed to evaluate the cause of the difference and to determine if adding newer data to the background dataset, replacing the background dataset with the newer data, or continuing to use the existing background dataset was most appropriate. If the differences appeared to have been caused by a release, then the previous background dataset would have continued to be used.

The complete Mann-Whitney test results and a summary of the significant findings can be found in Appendix B. No statistically significant differences were found between the two groups for fluoride or pH.

After the revised background set was established, a parametric or non-parametric analysis was selected based on the distribution of the data and the frequency of non-detect data. Estimated results less than the practical quantitation limit (PQL) – i.e., "J-flagged" data – were considered detections and the estimated results were used in the statistical analyses. Non-parametric analyses were selected for datasets with at least 50% non-detect data or datasets that could not be normalized. Parametric analyses were selected for datasets (either transformed or untransformed) that passed the Shapiro-Wilk / Shapiro-Francía test for normality. The Kaplan-Meier non-detect adjustment was applied to datasets with between 15% and 50% non-detect data. For datasets with fewer than 15% non-detect data, non-detect data were replaced with one half of the PQL. The selected analysis (i.e., parametric or non-parametric) and transformation (where applicable) for each background dataset are shown in Attachment B.

UPLs were updated using all the historical data through March 2019 to represent background values. LPLs were also updated for pH. The updated prediction limits are summarized in Table 3. Intrawell tests continued to be used to evaluate potential SSIs for fluoride and pH, whereas interwell tests continued to be used to evaluate potential SSIs for boron, calcium, chloride, sulfate, and TDS. The UPLs were calculated for a one-of-two retesting procedure; i.e., if at least one sample in a series of two does not exceed the UPL, then it can be concluded that an SSI has not occurred. In practice, where the initial result did not exceed the UPL, a second sample was not collected. The retesting procedures allowed achieving an acceptably high statistical power to detect changes at downgradient wells for constituents evaluated using intrawell prediction limits.

2.2.4 Evaluation of Potential Appendix III SSIs

The CCR rule allows CCR units to move from assessment monitoring to detection monitoring if all Appendix III and Appendix IV parameters were at or below background levels for two consecutive sampling events [40 CFR 257.95(e)]. Since no Appendix IV SSLs were identified, Appendix III results were analyzed to assess whether concentrations of Appendix III parameters at the compliance wells exceeded background concentrations.

Data collected during the June 2019 and July 2019 assessment monitoring events from each compliance well were compared to the prediction limits to evaluate results above background values. The results from this event and the prediction limits are summarized in Table 4. While the pH measurements exceeded the intrawell UPL of 7.3 SU at MW-1 (10.2 SU) and the intrawell UPL of 7.2 SU at MW-1604 (8.7 SU) for the June 2019 event, both of these values were removed as outliers. The following exceedances of the upper prediction limits (UPLs) were noted:

• Calcium concentrations exceeded the interwell UPL of 19.6 mg/L at MW-1 (35.9 mg/L and 36.8 mg/L), MW-1605 (45.5 mg/L and 46.5 mg/L), and MW-1606 (56.6 mg/L and 52.8 mg/L).

- Chloride concentrations exceeded the interwell UPL of 41.0 mg/L at MW-1 (64.4 mg/L and 57.4 mg/L), MW-1605 (91.8 mg/L and 91.6 mg/L), and MW-1606 (177 mg/L and 186 mg/L).
- Sulfate concentrations exceeded the interwell UPL of 57.4 mg/L at MW-1 (141 mg/L and 143 mg/L), MW 1605 (226 mg/L for both events), and MW-1606 (204 mg/L and 191 mg/L).
- The pH values were below the intrawell LPL of 6.1 SU at MW-1604 (5.9 SU) and below the intrawell LPL of 5.5 SU at MW-4 (5.4 SU).
- TDS concentrations exceeded the interwell UPL of 260 mg/L at MW-1 (330 mg/L and 362) mg/L), MW-1605 (530 mg/L and 517 mg/L), and MW-1606 (571 mg/L and 597 mg/L).

Based on these results, concentrations of Appendix III parameters exceeded background levels at compliance wells at the Amos BAP during assessment monitoring. As a result, the Amos BAP CCR unit will remain in assessment monitoring.

2.3 Conclusions

A semi-annual assessment monitoring event was conducted in accordance with the CCR Rule. The laboratory and field data were reviewed prior to statistical analysis, with no QA/QC issues identified that impacted data usability. A review of outliers identified potential outliers for pH, beryllium, and selenium in the June 2019 data. GWPSs were re-established for the Appendix IV parameters. A confidence interval was constructed at each compliance well for each Appendix IV parameter; SSLs were concluded if the entire confidence interval exceeded the GWPS. No SSLs were identified.

Revised prediction limits were calculated for Appendix III parameters. Interwell tests continued to be used to evaluate potential SSIs for boron, calcium, chloride, sulfate, and TDS, and intrawell tests continued to be used to evaluate potential SSIs for fluoride and pH. Prediction limits were recalculated using a one-of-two retesting procedure. The Appendix III results were evaluated to assess whether concentrations of Appendix III parameters exceeded background levels. Calcium, chloride, sulfate, and TDS results exceeded background levels; pH values were detected below the background levels.

Based on this evaluation, either the Amos BAP CCR unit will remain in assessment monitoring or an ASD will be conducted to evaluate if the unit can return to detection monitoring.

SECTION 3

REFERENCES

American Electric Power (AEP). 2017. Statistical Analysis Plan – Amos Plant. January 2017.

Geosyntec Consultants (Geosyntec). 2018. Statistical Analysis Summary – Bottom Ash Pond, John E. Amos Plant, Winfield, West Virginia. January 15, 2018.

Geosyntec, 2019. Statistical Analysis Summary – Bottom Ash Pond, Amos Plant, Winfield, West Virginia. July 10, 2019.

TABLES

Table 1 - Groundwater Data Summary Amos - Bottom Ash Pond

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Parameter was not present in concentrations above the method detection limit and is reported as the reporting limit

J: Estimated value. Parameter was detected in concentrations below the reporting limit

-: Not analyzed

Table 1 - Groundwater Data Summary Amos - Bottom Ash Pond

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Parameter was not present in concentrations above the method detection limit and is reported as the reporting limit

J: Estimated value. Parameter was detected in concentrations below the reporting limit

-: Not analyzed

Table 2: Groundwater Protection Standards

Amos Plant - Bottom Ash Pond

Notes:

Grey cell indicates calculated UTL is higher than MCL or CCR Rule-specified value.

MCL = Maximum Contaminant Level

Calculated UTL (Upper Tolerance Limit) represents site-specific background values.

The higher of the calculated UTL or MCL/Rule-Specified Level is used as the GWPS.

Table 3: Revised Prediction Limits Amos Plant - Bottom Ash Pond

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

Table 4: Appendix III Data Summary Amos Plant - Bottom Ash Pond

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

Bold values exceed the background value.

Background values are shaded gray.

Asterisks indicate the value was removed from the dataset as an outlier.

ATTACHMENT A Certification by Qualified Professional Engineer

Certification by Qualified Professional Engineer

I certify that the selected and above described statistical method is appropriate for evaluating the groundwater monitoring data for the Amos Bottom Ash Pond CCR management area and that the requirements of 40 CFR 257.93(f) have been met.

DAVID ANTHONY MILLER

Printed Name of Licensed Professional Engineer

Saird Anthony Miller Signature

 11111000 **STE O**

22663 License Number

WEST VIRGINIA

Licensing State

Date

12.23.19

ATTACHMENT B Statistical Analysis Output

GROUNDWATER STATS CONSULTING

December 9, 2019

Geosyntec Consultants Attn: Ms. Allison Kreinberg 941 Chatham Lane, #103 Columbus, OH 43221

Re: Amos Bottom Ash Pond Background Update – 2019

Dear Ms. Kreinberg,

Groundwater Stats Consulting (GSC), formerly the statistical consulting division of Sanitas Technologies, is pleased to provide the background update of groundwater data for 2019 at American Electric Power Company's Amos Bottom Ash Pond. The analysis complies with the federal rule for the Disposal of Coal Combustion Residuals from Electric Utilities (CCR Rule, 2015) as well as with the USEPA Unified Guidance (2009).

Sampling began at the site for the CCR program in 2016. The monitoring well network, as provided by Geosyntec Consultants, consists of the following:

- o **Upgradient wells:** BAP-MW-1601, BAP-MW-1602A, BAP-MW-1603A, and BAP-MW-6; and
- o **Downgradient wells:** BAP-MW-1, BAP-MW-1604, BAP-MW-1605, BAP-MW-1606, BAP-MW-4, and BAP-MW-5.

Data were sent electronically, and the statistical analysis was conducted according to the Statistical Analysis Plan and screening evaluation prepared by GSC and approved by Dr. Kirk Cameron, PhD Statistician with MacStat Consulting, primary author of the USEPA Unified Guidance, and Senior Advisor to GSC.

The CCR program consists of the following constituents:

- o **Appendix III** (Detection Monitoring)boron, calcium, chloride, fluoride, pH, sulfate, and TDS;
- o **Appendix IV** (Assessment Monitoring)antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, combined radium 226 + 228, fluoride, lead, lithium, mercury, molybdenum, selenium, and thallium.

Time series and box plots for Appendix III and IV parameters are provided for all wells and constituents; and are used to evaluate concentrations over the entire record (Figures A and B, respectively). Values in background, which have previously been flagged as outliers, may be seen in a lighter font and disconnected symbol on the graphs. Additionally, a summary of flagged values follows this letter (Figure C).

Summary of Statistical Method:

- 1) Intrawell prediction limits, combined with a 1-of-2 resample plan for fluoride and pH; and
- 2) Interwell prediction limits combined with a 1-of-2 resample plan for boron, calcium, chloride, sulfate, and TDS.

Parametric prediction limits are utilized when the screened historical data follow a normal or transformed-normal distribution. When data cannot be normalized or the majority of data are nondetects, a nonparametric test is utilized. The distribution of data is tested using the Shapiro-Wilk/Shapiro-Francia test for normality. After testing for normality and performing any adjustments as discussed below (US EPA, 2009), data are analyzed using either parametric or non-parametric prediction limits.

- No statistical analyses are required on wells and analytes containing 100% nondetects (USEPA Unified Guidance, 2009, Chapter 6).
- When data contain <15% nondetects in background, simple substitution of onehalf the reporting limit is utilized in the statistical analysis. The reporting limit utilized for nondetects is the practical quantification limit (PQL) as reported by the laboratory.
- When data contain between 15-50% nondetects, the Kaplan-Meier nondetect adjustment is applied to the background data. This technique adjusts the mean and standard deviation of the historical concentrations to account for concentrations below the reporting limit.
- Nonparametric prediction limits are used on data containing greater than 50% nondetects.

History of Initial Background Screening Conducted in December 2017

Outlier Evaluation

Time series plots are used to identify suspected outliers, or extreme values that would result in limits that are not conservative from a regulatory perspective, in proposed background data. Suspected outliers at all wells for Appendix III and Appendix IV parameters were formally tested using Tukey's box plot method and, when identified, flagged in the computer database with "o" and deselected prior to construction of statistical limits.

Tukey's outlier test noted a few outliers as may be seen on the Outlier Summary Table and accompanying graphs. Any values flagged as outliers are plotted in a lighter font on the time series graph. The test identified an outlier for arsenic in well BAP-MW-1604; and pH in well BAP-MW-5; however, these concentrations were similar to concentrations in neighboring wells and were not flagged as outliers. A substitution of the most recent reporting limit was applied when varying detection limits existed in data.

No true seasonal patterns were observed on the time series plots for any of the detected data; therefore, no deseasonalizing adjustments were made to the data. When seasonal patterns are observed, data may be deseasonalized so that the resulting limits will correctly account for the seasonality as a predictable pattern rather than random variation or a release.

While trends may be visual, a quantification of the trend and its significance is needed. The Sen's Slope/Mann Kendall trend test was used to evaluate all data at each well to identify statistically significant increasing or decreasing trends. In the absence of suspected contamination, significant trending data are typically not included as part of the background data used for construction of prediction limits. This step serves to eliminate the trend and, thus, reduce variation in background. When statistically significant decreasing trends are present, earlier data are evaluated to determine whether earlier concentration levels are significantly different than current reported concentrations and will be deselected as necessary. When the historical records of data are truncated for the reasons above, a summary report will be provided to show the date ranges used in construction of the statistical limits.

The results of the trend analyses showed a couple statistically significant increasing trends and several statistically significant decreasing trends were included in the previous screening. All trends were relatively low in magnitude when compared to average concentrations and data, therefore, required no adjustment at this time.

Appendix III – Determination of Spatial Variation

The Analysis of Variance (ANOVA) was used to statistically evaluate differences in average concentrations among upgradient wells, which assists in identifying the most appropriate statistical approach. Interwell tests, which compare downgradient well data to statistical limits constructed from pooled upgradient well data, are appropriate when average concentrations are similar across upgradient wells. Intrawell tests, which compare compliance data from a single well to screened historical data within the same well, are appropriate when upgradient wells exhibit spatial variation; when statistical limits constructed from upgradient wells would not be conservative from a regulatory perspective; and when downgradient water quality is unimpacted compared to upgradient water quality for the same parameter.

The ANOVA identified variation for all Appendix III parameters except for boron. Therefore, boron is eligible for interwell prediction limits, and all other parameters were further evaluated as described for the appropriateness of intrawell testing to accommodate the groundwater quality.

Appendix III - Statistical Limits

Intrawell limits constructed from carefully screened background data from within each well serve to provide statistical limits that are conservative (i.e. lower) from a regulatory perspective, and that will rapidly identify a change in more recent compliance data from within a given well. This statistical method removes the element of variation from across wells and eliminates the chance of mistaking natural spatial variation for a release from the facility. Prior to performing intrawell prediction limits, several steps are required to reasonably demonstrate downgradient water quality does not have existing impacts from the practices of the facility.

Exploratory data analysis was used as a general comparison of concentrations in downgradient wells for all Appendix III parameters recommended for intrawell analyses to concentrations reported in upgradient wells. Upper tolerance limits are used in conjunction with confidence intervals to determine whether the estimated averages in downgradient wells are higher than observed levels upgradient of the facility. The upper tolerance limits were constructed to represent the extreme upper range of possible background levels at the site.

In cases where downgradient average concentrations are higher than observed concentrations upgradient for a given constituent, an independent study and hydrogeological investigation would be required to identify local geochemical conditions and expected groundwater quality for the region to justify an intrawell approach. Such an assessment is beyond the scope of services provided by Groundwater Stats Consulting. When there is not an obvious explanation for observed concentration differences in downgradient wells relative to reported concentrations in upgradient wells, interwell prediction limits will initially be selected for the statistical method until further evidence shows that concentrations are due to natural variation rather than a result of the facility.

Parametric tolerance limits were constructed with a target of 99% confidence and 95% coverage using pooled upgradient well data for each of the Appendix III parameters. The confidence and coverage levels for nonparametric tolerance limits are dependent upon the number of background samples. As more data are collected, the background population is better represented and the confidence and coverage levels increase.

Confidence intervals were constructed on downgradient wells for each of the Appendix III parameters, using the tolerance limits discussed above, to determine intrawell eligibility. When the entire confidence interval is above a background standard for a given parameter, interwell methods are initially recommended as the statistical method. Therefore, only parameters with confidence intervals which did not exceed background standards are eligible for intrawell prediction limits.

Confidence intervals for the above parameters were found to be within their respective background limit for fluoride and pH; while confidence intervals were above their respective background limits in at least one well for calcium, chloride, sulfate, and TDS. Therefore, intrawell methods are recommended for fluoride and pH, and interwell methods are initially recommended for boron, calcium, chloride, sulfate and TDS. As mentioned earlier, if a demonstration supports natural variation in groundwater, intrawell methods will be considered for all parameters.

All available data through June 2017 at each well were used to establish intrawell background limits for the parameters identified above based on a 1-of-2 resample plan that will be used for future comparisons. Interwell prediction limits, combined with a 1 of-2 resample plan, were constructed from upgradient wells for parameters eligible for interwell testing. Downgradient measurements will be compared to these background limits during each subsequent semi-annual sampling event.

Natural systems continuously evolve due to physical changes made to the environment. Examples include capping a landfill, paving areas near a well, or lining a drainage channel to prevent erosion. Periodic updating of background statistical limits will be necessary to accommodate these types of changes. In the interwell case, newer data will be included in background during each sample event after careful screening for new outliers. In the intrawell case, data for all wells and constituents are re-evaluated when a minimum of 4 new data points are available to determine whether earlier concentrations are representative of present-day groundwater quality. In some cases, the earlier portion of data are deselected prior to construction of limits in order to provide sensitive limits that will rapidly detect changes in groundwater quality. Even though the data are excluded from the calculation, the values will continue to be reported and shown in tables and graphs.

In the event of an initial exceedance of compliance well data, the 1-of-2 resample plan allows for collection of an additional sample to determine whether the initial exceedance is confirmed. When the resample confirms the initial exceedance, a statistically significant increase (SSI) is identified and further research would be required to identify the cause of the exceedance (i.e. impact from the site, natural variation, or an off-site source). If the resample falls within the statistical limit, the initial exceedance is considered to be a false positive result and, therefore, no further action is necessary.

Background Update – Appendix III Parameters – November 2019

Prior to updating background data, samples were re-evaluated for all wells for intrawell parameters and all upgradient wells for interwell parameters using Tukey's outlier test and visual screening with the July 2019 samples. Note that the reporting limit during the March 2019 event for boron in wells BAP-MW-1603A, BAP-MW-1604, BAP-MW-1605, BAP-MW-1606, BAP-MW-4, BAP-MW-5, and BAP-MW-6 was 1.0 mg/L compared to a historical reporting limit of 0.005 mg/L and, therefore, these values were flagged as outliers to avoid setting a statistical limit that would not be conservative from a regulatory perspective.

As mentioned above, flagged data are displayed in a lighter font and as a disconnected symbol on the time series reports, as well as in a lighter font on the accompanying data pages. An updated summary of Tukey's test results and flagged outliers follows this letter.

For constituents requiring intrawell prediction limits, the Mann-Whitney (Wilcoxon Rank Sum) test was used to compare the medians of historical data through June 2017 to the new compliance samples at each well through March 2019 to evaluate whether the groups are statistically different at the 99% confidence level, in which case background data may be updated with compliance data (Figure D). No statistically significant differences were found between the two groups for the well/constituent pairs.

Typically, when the test concludes that the medians of the two groups are significantly different, particularly in the downgradient wells, the background are not updated to include the newer data but will be reconsidered in the future. A summary of these results follows this letter and the test results are included with the Mann Whitney test section at the end of this report.

Intrawell prediction limits using all historical data through March 2019, combined with a 1-of-2 resample plan, were constructed for fluoride and pH (Figure E).

For parameters tested using interwell analyses, the Sen's Slope/Mann-Kendall trend test was used on upgradient wells to determine whether concentrations are statistically increasing, decreasing or stable (Figure F). No statistically significant increasing or decreasing trends were noted with the exception of increasing trends for chloride in upgradient wells BAP-MW-1601 and BAP-MW-1602A. The magnitude of these trends, however, is low relative to the average concentrations in these wells. Therefore, no adjustments were required at this time. A summary of these results is included with the trend tests.

Interwell prediction limits, combined with a 1-of-2 resample plan, were updated using all available data from upgradient wells through March 2019 for boron, calcium, chloride, and TDS (Figure G). Interwell prediction limits pool upgradient well data to establish a background limit for an individual constituent. A summary table of the updated limits may be found following this letter in the Prediction Limit Summary Tables.

Evaluation of Appendix IV Parameters – November 2019

Interwell Tolerance limits were used to calculate background limits from all available pooled upgradient well data for Appendix IV parameters to determine the Alternate Contaminant Level (ACL) for each constituent (Figure H). Background data are screened for outliers and extreme trending patterns that would lead to artificially elevated statistical limits. Any flagged values may be seen on the Outlier Summary following this letter.

Parametric limits use a target of 95% confidence and 95% coverage. The confidence and coverage levels for nonparametric tolerance limits are dependent upon the number of background samples. These limits were compared to the Maximum Contaminant Levels (MCLs) and CCR-Rule specified levels in the Groundwater Protection Standard (GWPS) table following this letter to determine the highest limit for use as the GWPS in the Confidence Interval comparisons (Figure I).

Confidence intervals were then constructed on downgradient wells for each of the Appendix IV parameters using the highest limit of the MCL, CCR-Rule specified levels, or background as discussed above (Figure J). Only when the entire confidence interval is above a GWPS is the well/constituent pair considered to exceed its respective standard. No exceedances were noted for any of the well/constituent pairs. A summary of the confidence interval results follows this letter.

Thank you for the opportunity to assist you in the statistical analysis of groundwater quality for the Amos Bottom Ash Pond. If you have any questions or comments, please feel free to contact us.

For Groundwater Stats Consulting,

Andrew T. Collins Groundwater Analyst

Kristina Rayner

Kristina L. Rayner Groundwater Statistician

FIGURE A: TIME SERIES

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Time Series

Constituent: Antimony, total Analysis Run 12/9/2019 1:58 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Antimony, total Analysis Run 12/9/2019 1:58 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Arsenic, total Analysis Run 12/9/2019 1:58 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Time Series

Constituent: Arsenic, total Analysis Run 12/9/2019 1:58 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Time Series

Constituent: Barium, total Analysis Run 12/9/2019 1:58 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Barium, total Analysis Run 12/9/2019 1:58 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Constituent: Beryllium, total Analysis Run 12/9/2019 1:58 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Beryllium, total Analysis Run 12/9/2019 1:58 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Boron, total Analysis Run 12/9/2019 1:58 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Constituent: Cadmium, total Analysis Run 12/9/2019 1:58 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Time Series

Constituent: Cadmium, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

70BAP-MW-1 \bullet 56 $BAP-MW-1601$ (bg) ● BAP-MW-1602A (bg) 42mg/L ▲ BAP-MW-1603A (bg) 28 $\overline{\mathbf{v}}$ BAP-MW-1604140 7/26/163/1/17 10/6/17 5/12/18 12/17/18 7/24/19

Time Series

Constituent: Calcium, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Time Series

Constituent: Calcium, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Chloride, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Time Series

Constituent: Chloride, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Chromium, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Chromium, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Cobalt, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Time Series

Constituent: Cobalt, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP
Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Combined Radium 226 + 228 Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Constituent: Fluoride, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Time Series

Constituent: Fluoride, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Time Series

Amos BAP Client: Geosyntec Data: Amos BAP

Time Series

Constituent: Lead, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Constituent: Lithium, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Lithium, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Time Series

Constituent: Mercury, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Mercury, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Constituent: Molybdenum, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Time Series

Constituent: Molybdenum, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Time Series

Constituent: pH, field Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: pH, field Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Constituent: Selenium, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Time Series

Constituent: Selenium, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Hollow symbols indicate censored values.

Time Series

Constituent: Sulfate, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Time Series

Constituent: Sulfate, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Constituent: Thallium, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Time Series

Constituent: Thallium, total Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Total Dissolved Solids [TDS] Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 12/9/2019 1:59 PMAmos BAP Client: Geosyntec Data: Amos BAP

FIGURE B: BOX PLOTS

Box & Whiskers Plot

Constituent: Antimony, total Analysis Run 12/9/2019 2:00 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Arsenic, total Analysis Run 12/9/2019 2:00 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Barium, total Analysis Run 12/9/2019 2:00 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Beryllium, total Analysis Run 12/9/2019 2:00 PMAmos BAP Client: Geosyntec Data: Amos BAP

Box & Whiskers Plot

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Box & Whiskers Plot

Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Cadmium, total Analysis Run 12/9/2019 2:00 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Calcium, total Analysis Run 12/9/2019 2:00 PMAmos BAP Client: Geosyntec Data: Amos BAP

Box & Whiskers Plot

Constituent: Chloride, total Analysis Run 12/9/2019 2:00 PMAmos BAP Client: Geosyntec Data: Amos BAP

Box & Whiskers Plot

Box & Whiskers Plot

Constituent: Chromium, total Analysis Run 12/9/2019 2:00 PMAmos BAP Client: Geosyntec Data: Amos BAP

Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Combined Radium 226 + 228 Analysis Run 12/9/2019 2:00 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Fluoride, total Analysis Run 12/9/2019 2:01 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Box & Whiskers Plot

Box & Whiskers Plot

Constituent: Lithium, total Analysis Run 12/9/2019 2:01 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Mercury, total Analysis Run 12/9/2019 2:01 PMAmos BAP Client: Geosyntec Data: Amos BAP

Box & Whiskers Plot

Constituent: Molybdenum, total Analysis Run 12/9/2019 2:01 PMAmos BAP Client: Geosyntec Data: Amos BAP

Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Box & Whiskers Plot

Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Selenium, total Analysis Run 12/9/2019 2:01 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Sulfate, total Analysis Run 12/9/2019 2:01 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Thallium, total Analysis Run 12/9/2019 2:01 PMAmos BAP Client: Geosyntec Data: Amos BAP

Box & Whiskers Plot

Constituent: Total Dissolved Solids [TDS] Analysis Run 12/9/2019 2:01 PMAmos BAP Client: Geosyntec Data: Amos BAP

FIGURE C: OUTLIER SUMMARY

Outlier Summary

Amos BAP Client: Geosyntec Data: Amos BAP Printed 12/9/2019, 2:02 PM

7/25/2016 8/23/2016 10/18/2016 12/12/2016 12/13/2016 2/7/2017 2/8/2017 1/8/2018 3/14/2019 3/15/2019 6/10/2019 6/11/2019 BAP-MW-1604 Beryllium, total (mglL)
BAP-MW-1604 Beryllium, total (mglL) total (mglL) total (mglL) (mglC) (mglL) total (mglL)
BAP-MW-1604 BAP-MW-1603A Boron, 1604 Boron, total GmgD, total (mglC) (mglC) (mglC) (mglC) (mgmglC 0.000142 (o) <0.1 (o) <1 (o) <1 (o) ≤ 1 (o) ≤ 1 (o) ≤ 0.1 (o) ≤ 0.1 (o) 0.00327 (o) 0.0859 (o)

7/25/2016 8/23/2016 10/18/2016 12/12/2016 12/13/2016 2/7/2017 2/8/2017 1/8/2018 3/14/2019 3/15/2019 6/10/2019 6/11/2019 BAP-MW-1601 Combined Radium 226 + 228 (pCill.)
BAP-MW-1601 Combined Radium 226 + 228 (mgll.)
BAP-MW-1601 Combined Radium 226 + 228 (mgll.)
BAP-MW-1604 pH, field (SU)
BAP-MW-1604 PH, field (SU)
BAP-MW-1606 PH, field (SU) 35.021 (o) 20.83 (o) < 0.03 (o) < 0.03 (o) 0.0111 (o) 0.0192 (o) 10.19 (o) 9.51 (o) 8.82 (o) 8.65 (o) 8.4 (o)

Outlier Summary Page 2

Amos BAP Client: Geosyntec Data: Amos BAP Printed 12/9/2019, 2:02 PM

1/8/2018 3/14/2019 3/15/2019 6/10/2019 9.32 (o) 0.0004 (o)

6/11/2019

Upgradient Outlier Analysis - Significant Results

Upgradient Outlier Analysis - All Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 12/4/2019, 4:42 PM

Constituent: Barium, total Analysis Run 12/4/2019 4:40 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

07/26/16 ♦

 \Diamond \Diamond \triangle

ट

♦

 \diamond

 $\hat{8}$

 \Diamond

 $\hat{\mathcal{Q}}$

Rŀ

 \Diamond

0.00004

mg/L

BAP-MW-1601,BAP-MW-1602A,BAP-MW-1603A...0.00020.000160.00012 \Diamond \Diamond \Diamond 0.00008

Tukey's Outlier Screening, Pooled Background

 $n = 52$ No outliers found.

 Tukey's method selected by user.Data were cube root trans-

formed to achieve best W statistic (graph shownin original units).

> High cutoff = 0.0002035 low cutoff = 5.9e-7, basedon IQR multiplier of 3.

Constituent: Beryllium, total Analysis Run 12/4/2019 4:40 PMAmos BAP Client: Geosyntec Data: Amos BAP

3/1/17 10/6/17 5/12/18 12/17/18 7/24/19

 \Diamond

 $\hat{8}$

 \Diamond \Diamond

 \Diamond

Constituent: Calcium, total Analysis Run 12/4/2019 4:40 PMAmos BAP Client: Geosyntec Data: Amos BAP

mg/L

Tukey's Outlier Screening, Pooled Background

 $n = 58$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 997.6, low $cutoff = 0.119$, based on IQR multiplier of 3.

Constituent: Chloride, total Analysis Run 12/4/2019 4:40 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Combined Radium 226 + 228 Analysis Run 12/4/2019 4:40 PMAmos BAP Client: Geosyntec Data: Amos BAP

Tukey's Outlier Screening, Pooled Background

n = 58No outliers found.

 $n = 52$ No outliers found. Tukey's method selected by user.Data were natural log transformed to achieve best W statistic (graph shown in original units).High cutoff = 3.86, low cutoff = 0.00000215, based on IQR multiplier of 3.

 Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 15.49 , low cutoff = 0.0006772, basedon IQR multiplier of 3.

Constituent: Fluoride, total Analysis Run 12/4/2019 4:40 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Mercury, total Analysis Run 12/4/2019 4:40 PMAmos BAP Client: Geosyntec Data: Amos BAP

Tukey's Outlier Screening, Pooled Background

 $n = 52$ No outliers found.

Tukey's method select-

 transformed to achieve best W statistic (graphshown in original units).

 cutoff = 0.000004903,based on IQR multiplier

 Tukey's method selected by user.

Data were cube root transformed to achieve best W statistic (graph shownin original units).

High cutoff = 0.007141 . $low cutoff = -4.1e-7,$ based on IQR multiplier \overline{of} 3.

Constituent: Molybdenum, total Analysis Run 12/4/2019 4:40 PMAmos BAP Client: Geosyntec Data: Amos BAP

Tukey's Outlier Screening, Pooled Background

n = 58

 \Diamond

 \Diamond

♦

 \Diamond

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 1.1e7, low cutoff = 0.000002127, based on IQR multiplierof 3.

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Constituent: Thallium, total Analysis Run 12/4/2019 4:40 PMAmos BAP Client: Geosyntec Data: Amos BAP

mg/L

Tukey's Outlier Screening, Pooled Background

BAP-MW-1601,BAP-MW-1602A,BAP-MW-1603A...

n = 58No outliers found.

 Tukey's method selected by user.

Ladder of Powers transformations did not improve normality; analysis run on raw data.

High cutoff = 445 , low cutoff = -122, based onIQR multiplier of 3.

Constituent: Total Dissolved Solids [TDS] Analysis Run 12/4/2019 4:40 PMAmos BAP Client: Geosyntec Data: Amos BAP

Outlier Analysis - Significant Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 12/4/2019, 4:38 PM

Outlier Analysis - All Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 12/4/2019, 4:38 PM

Outlier Analysis - All Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 12/4/2019, 4:38 PM

Constituent: Antimony, total Analysis Run 12/4/2019 4:35 PMAmos BAP Client: Geosyntec Data: Amos BAP

 $n = 13$ No outliers found.

 $n = 13$ No outliers found. Tukey's method selected by user. Ladder of Powers transformations did not improve normality; analysis run on raw data.High cutoff = 0.00012, low cutoff = -0.000055, based on IQR multiplier

 $of 3.$

 Tukey's method select-ed by user.Ladder of Powers trans-

formations did not improve normality; analysis run on raw data.

High cutoff = 0.00006 . low cutoff = -0.00001, based on IQR multiplier \overline{of} 3.

Constituent: Antimony, total Analysis Run 12/4/2019 4:35 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Arsenic, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

 $n = 13$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 0.01124 , low cutoff = 0.002222, based on IQR multiplierof 3.

Constituent: Arsenic, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Arsenic, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

 $n = 13$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 0.007573,low cutoff = 0.001266, based on IQR multiplierof 3.

Constituent: Arsenic, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Barium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

 $n = 13$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 0.1197 , low cutoff = 0.03496, based on IQR multiplierof 3.

Constituent: Barium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Constituent: Beryllium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

 $n = 13$ No outliers found.Tukey's method select-ed by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 0.0003156 . low cutoff = 0.00000831, based on IQR multiplier \overline{of} 3.

Constituent: Beryllium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Constituent: Beryllium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

 $n = 13$ No outliers found.Tukey's method select-ed by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 0.0002094 low cutoff = 0.000009805,based on IQR multiplier $of 3.$

Constituent: Beryllium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Cadmium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

 $n = 13$ No outliers found.Tukey's method select-ed by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 0.0004764 low cutoff = 0.00005237, based on IQR multiplier \overline{of} 3.

Constituent: Cadmium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Chromium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

 $n = 13$ No outliers found. Tukey's method selected by user.

 $n = 13$ No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units).High cutoff = 0.001157, low cutoff = 1.2e-7, based on IQR multiplier of 3.

Data were cube root transformed to achieve best

 W statistic (graph shownin original units).High cutoff = 0.005186 .

 low cutoff = 0.00001356, based on IQR multiplier \overline{of} 3.

Constituent: Chromium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Ω 7/26/160.000140.000280.000420.000560.0007 3/1/17 10/6/17 5/12/18 12/17/18 7/24/19 Tukey's Outlier ScreeningBAP-MW-1605Constituent: Chromium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAPmg/L $n = 13$ No outliers found. Tukey's method selected by user.Data were natural log transformed to achieve best W statistic (graph shown in original units).High cutoff = 0.003063, low cutoff = 0.00002504, based on IQR multiplier of 3. Ω 7/25/160.00040.00080.00120.00160.002 2/28/17 10/5/17 5/12/18 12/17/18 7/24/19 Tukey's Outlier ScreeningBAP-MW-1606Constituent: Chromium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAPmg/L

 $n = 13$

No outliers found. Tukey's method selected by user.

Ladder of Powers transformations did not improve normality; analysis run on raw data.

High cutoff = 0.004218, low cutoff = -0.00266, based on IQR multiplier $of 3.$

 $n = 13$

of 3.

No outliers found. Tukey's method selected by user.Data were natural log transformed to achieve best W statistic (graph shown in original units).High cutoff = 0.00166 , low cutoff = 0.0000347,based on IQR multiplier

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Constituent: Chromium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Chromium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Cobalt, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

n = 13

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 0.02786, low cutoff = 0.008147, based on IQR multiplierof 3.

Constituent: Cobalt, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Combined Radium 226 + 228 Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

pCi/L

 $n = 14$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 15.36, low cutoff = 0.0596, basedon IQR multiplier of 3.

Constituent: Combined Radium 226 + 228 Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Combined Radium 226 + 228 Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

pCi

No outliers found. Tukey's method selected by user.

 $n = 14$

Data were cube root transformed to achieve best W statistic (graph shownin original units).

High cutoff = 12.17, low cutoff = -0.2181, based on IQR multiplier of 3.

 $n = 14$ No outliers found.

 Tukey's method select-ed by user.Ladder of Powers trans-

formations did not improve normality; analysis run on raw data.

High cutoff = 2.949 , low cutoff = -1.147, based on IQR multiplier of 3.

Constituent: Combined Radium 226 + 228 Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Constituent: Fluoride, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Fluoride, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Lead, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

 $n = 13$ No outliers found.Tukey's method select-ed by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 0.02986 . low cutoff = 0.00001068,based on IQR multiplier $of 3.$

Constituent: Lead, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Lead, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Lead, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

 $n = 13$ No outliers found.

 Tukey's method selected by user. Data were square root

 transformed to achieve best W statistic (graphshown in original units).

High cutoff = 0.00557, low cutoff = -0.0005133, based on IQR multiplier $of 3.$

Ω 7/26/160.0060.0120.0180.0240.03 3/1/17 10/5/17 5/11/18 12/15/18 7/22/19 Tukey's Outlier ScreeningBAP-MW-1Constituent: Lithium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAPmg/L $n = 13$ No outliers found. Tukey's method selected by user.Data were natural log transformed to achieve best W statistic (graph shown in original units).High cutoff = 0.3296, low cutoff = 0.00007721, based on IQR multiplier of 3. Ω 7/26/160.0060.0120.0180.0240.03 3/1/17 10/6/17 5/12/18 12/17/18 7/24/19 Tukey's Outlier ScreeningBAP-MW-1604Constituent: Lithium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAPmg/L

 $n = 13$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 400.2 , low cutoff = 9.5e-8, basedon IQR multiplier of 3.

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Constituent: Lithium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

 $n = 13$ No outliers found.

Tukey's method select-ed by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 3.333 , low cutoff = 0.00001559, based on IQR multiplier of 3.

Constituent: Lithium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Tukey's method select-

and upper quartiles are

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Constituent: Mercury, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

 $n = 10$ No outliers found. Tukey's method selected by user.Data were cube transform-

ed to achieve best W statistic (graph shown inoriginal units).

The results were invalidated, because the lowerand upper quartiles areequal.

Constituent: Mercury, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Mercury, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

 $n = 10$ No outliers found. Tukey's method selected by user.

Data were square root transformed to achieve best W statistic (graphshown in original units).

The results were invalidated, because the lowerand upper quartiles are

Constituent: Mercury, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Molybdenum, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Molybdenum, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: pH, field Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Outliers are drawn assolid. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 6.598 , low cutoff = 5.265, basedon IQR multiplier of 3.

Constituent: pH, field Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Ω 7/25/16246810 2/28/17 10/5/17 5/11/18 12/16/18 7/23/19 Tukey's Outlier ScreeningBAP-MW-1602A (bg)Constituent: pH, field Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAPSU $n = 15$ Outlier is drawn as solid.Tukey's method selected by user.Data were natural log transformed to achieve best W statistic (graph shown in original units).High cutoff = 8.224, low cutoff = 5.332, based on IQR multiplier of 3. Ω 7/25/161.83.65.47.29 2/28/17 10/5/17 5/12/18 12/17/18 7/24/19 Tukey's Outlier ScreeningBAP-MW-1603A (bg)Constituent: pH, field Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAPSU

Outlier is drawn as solid.Tukey's method selected by user.

 $n = 15$

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 8.307, low cutoff = 5.702, based on IQR multiplier of 3.

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Constituent: pH, field Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

SU

 $n = 16$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 7.539, low cutoff = 4.425, basedon IQR multiplier of 3.

Constituent: pH, field Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Constituent: pH, field Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

 Ξ

 $n = 15$ Outlier is drawn as solid. Tukey's method select-

 $n = 15$ No outliers found. Tukey's method selected by user.Data were natural log transformed to achieve best W statistic (graph shown in original units).High cutoff = 7.264, low $\text{cutoff} = 4.436$, based on IQR multiplier of 3.

ed by user.Data were natural log

 transformed to achieve best W statistic (graphshown in original units).

High cutoff = 7.001 , low cutoff = 5.174, based on IQR multiplier of 3.

Constituent: pH, field Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

No outliers found.Tukey's method select-

 $n = 13$

ed by user.Ladder of Powers transformations did not im-

prove normality; analysis run on raw data.

The results were invalidated, because the lowerand upper quartiles areequal.

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Constituent: Selenium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

 $n = 13$ No outliers found.

Tukey's method select-ed by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 0.002195 . low cutoff = 0.000008201, based on IQR multiplier \overline{of} 3.

Constituent: Selenium, total Analysis Run 12/4/2019 4:36 PMAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Constituent: Thallium, total Analysis Run 12/4/2019 4:37 PMAmos BAP Client: Geosyntec Data: Amos BAP

 $n = 13$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 22.1, low cutoff = 3.2e-10, basedon IQR multiplier of 3.

Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Thallium, total Analysis Run 12/4/2019 4:37 PMAmos BAP Client: Geosyntec Data: Amos BAP

 $n = 13$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graphshown in original units).

High cutoff = 62.5, low cutoff = 8.0e-11, basedon IQR multiplier of 3.

Constituent: Thallium, total Analysis Run 12/4/2019 4:37 PMAmos BAP Client: Geosyntec Data: Amos BAP

FIGURE D: MANN-WHITNEY ANALYSIS

Welch's t-test/Mann-Whitney - All Results (No Significant Results)

Amos BAP Client: Geosyntec Data: Amos BAP Printed 12/9/2019, 8:51 AM

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Fluoride, total Analysis Run 12/9/2019 8:50 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Fluoride, total Analysis Run 12/9/2019 8:50 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

mg/L

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Fluoride, total Analysis Run 12/9/2019 8:50 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Fluoride, total Analysis Run 12/9/2019 8:50 AM View: Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

BAP-MW-1606 compliance

background median = 0.03

compliance median = 0.03

Constituent: Fluoride, total Analysis Run 12/9/2019 8:50 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Fluoride, total Analysis Run 12/9/2019 8:50 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Fluoride, total Analysis Run 12/9/2019 8:50 AM View: Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: pH, field Analysis Run 12/9/2019 8:50 AM View: Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Mann-Whitney (Wilcoxon Rank Sum)BAP-MW-1602A (bg)

BAP-MW-1602A background

◆ BAP-MW-1602A compliance

background median = 6.66

compliance median = 6.53

 $Z = -0.07726$ (two-

 0.1 1.645
0.05 1.96

Alpha Table Sig.
0.2 1.282 No 0.2 1.282
0.1 1.645

0.05 1.96 No 0.02 2.326 No

 N_O

ׅ֚֡֡֡֡֝

tail)

2/3/17 8/15/17 2/25/18 9/6/18 3/19/19

Constituent: pH, field Analysis Run 12/9/2019 8:50 AM View: Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

 Ω 7/25/16

1.6

3.2

SU

4.8

6.4

▔

8

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: pH, field Analysis Run 12/9/2019 8:50 AM View: Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: pH, field Analysis Run 12/9/2019 8:50 AM View: Intrawell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

background median = 5.77

FIGURE E: INTRAWELL PREDICTION LIMITS

Intrawell Prediction Limit Summary Table - All Results

Amos BAP Client: Geosyntec Data: Amos BAP Printed 12/9/2019, 8:52 AM

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

mg/L

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 12 background values. 41.67% NDs. Well-constituent pair annual alpha = 0.02143. Individual comparison alpha = $0.01077(1$ of 2). Assumes 1 future value.

> Constituent: Fluoride, total Analysis Run 12/9/2019 8:51 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Prediction Limit

Intrawell Parametric, BAP-MW-1601 (bg)

Background Data Summary: Mean=0.04538, Std. Dev.=0.007763, n=13, 7.692% NDs. Normality test: Shapiro Wilk $@$ alpha = 0.01, calculated = 0.8754, critical = 0.814. Kappa = 2.34 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254. Assumes 1 future value.

> Constituent: Fluoride, total Analysis Run 12/9/2019 8:51 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Prediction LimitIntrawell Non-parametric, BAP-MW-1602A (bg)

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 12 background values. Well-constituent pair annual alpha $= 0.02143$. Individual comparison alpha $= 0.01077$ (1 of 2). Assumes 1 future value.

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Prediction LimitIntrawell Parametric, BAP-MW-1603A (bg)

Background Data Summary: Mean=0.2562, Std. Dev.=0.03042, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8762 , critical = 0.814 . Kappa = 2.34 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254. Assumes 1 future value.

Background Data Summary: Mean=0.08308, Std. Dev.=0.02689, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9002, critical = 0.814. Kappa = 2.34 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254. Assumes 1 future value.

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Prediction Limit

Intrawell Non-parametric, BAP-MW-1605

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 13 background values. 38.46% NDs. Well-constituent pair annual alpha = 0.01929. Individual comparison alpha = 0.009692 (1 of 2). Assumes 1 future value.

Constituent: Fluoride, total Analysis Run 12/9/2019 8:51 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Fluoride, total Analysis Run 12/9/2019 8:51 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Non-parametric test used in lieu of parametric prediction limit because censored data exceeded 50%. Limit is highest of 12 background values. 83.33% NDs. Well-constituent pair annual alpha = 0.02143. Individual comparison alpha = 0.01077 (1 of 2). Assumes 1 future value.

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, BAP-MW-4

Background Data Summary: Mean=0.05, Std. Dev.=0.01348, n=12. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8773 , critical = 0.805 . Kappa = 2.385 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254. Assumes 1 future value.

Prediction LimitIntrawell Parametric, BAP-MW-6 (bg)

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 12 background values. Well-constituent pair annual alpha

Constituent: Fluoride, total Analysis Run 12/9/2019 8:51 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

Background Data Summary: Mean=0.0575, Std. Dev.=0.01865, n=12. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9442 , critical = 0.805 . Kappa = 2.385 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254. Assumes 1 future value.

> Constituent: Fluoride, total Analysis Run 12/9/2019 8:51 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Prediction LimitIntrawell Non-parametric, BAP-MW-1

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limits are highest and lowest of 14 background values. Well-constituent pair annual alpha = 0.0343. Individual comparison alpha = 0.01722 (1 of 2). Assumes 1 future value.

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Non-parametric, BAP-MW-1601 (bg)

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limits are highest and lowest of 13 background values. Well-constituent pair annual alpha = 0.03858. Individual comparison alpha = 0.01938 (1 of 2). Assumes 1 future value.

Background Data Summary: Mean=6.616, Std. Dev.=0.2955, n=13. Normality test: Shapiro Wilk @alpha = 0.01, $cal = 0.9716$, critical = 0.814. Kappa = 2.34 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254. Assumes 1 future value.

Prediction Limit

Background Data Summary: Mean=6.808, Std. Dev.=0.2715, n=13. Normality test: Shapiro Wilk @alpha = 0.01, $caled = 0.9659$, critical = 0.814. Kappa = 2.34 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254. Assumes 1 future value.

> Constituent: pH, field Analysis Run 12/9/2019 8:51 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

> > Prediction Limit

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Prediction LimitIntrawell Non-parametric, BAP-MW-1604

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limits are highest and lowest of 13 background values. Well-constituent pair annual alpha = 0.03858 . Individual comparison alpha = 0.01938 (1 of 2). Assumes 1 future value.

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Background Data Summary: Mean=5.857, Std. Dev.=0.3028, n=14. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.921, critical = 0.825. Kappa = 2.295 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254. Assumes 1 future value.

Background Data Summary: Mean=5.468, Std. Dev.=0.1663, n=12. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9259, critical = 0.805. Kappa = 2.385 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254. Assumes 1 future value.

Prediction Limit

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limits are highest and lowest of 13 background values. Well-constituent pair annual alpha = 0.03858. Individual comparison alpha = 0.01938 (1 of 2). Assumes 1 future value.

Constituent: pH, field Analysis Run 12/9/2019 8:51 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: pH, field Analysis Run 12/9/2019 8:51 AM View: IntrawellAmos BAP Client: Geosyntec Data: Amos BAP

> Prediction LimitIntrawell Parametric, BAP-MW-6 (bg)

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Prediction LimitIntrawell Parametric, BAP-MW-5

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Background Data Summary: Mean=6.002, Std. Dev.=0.2085, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9248 , critical = 0.814 . Kappa = 2.34 (c=7, w=6, 1 of 2, event alpha = 0.05132). Report alpha = 0.001254. Assumes 1 future value.

Background Data Summary (based on cube root transformation): Mean=1.799, Std. Dev.=0.03062, n=13. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8146, critical = 0.814. Kappa = 2.34 (c=7, w=6, 1 of 2, event alpha $= 0.05132$). Report alpha $= 0.001254$. Assumes 1 future value.

FIGURE F: TREND TESTS

Trend Tests Summary Table - Upgradient Well Trend Tests

Amos BAP Client: Geosyntec Data: Amos BAP Printed 12/9/2019, 2:26 PM

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Constituent: Boron, total Analysis Run 12/9/2019 2:26 PM View: InterwellAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Boron, total Analysis Run 12/9/2019 2:26 PM View: InterwellAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Boron, total Analysis Run 12/9/2019 2:26 PM View: Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Calcium, total Analysis Run 12/9/2019 2:26 PM View: Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Calcium, total Analysis Run 12/9/2019 2:26 PM View: InterwellAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Calcium, total Analysis Run 12/9/2019 2:26 PM View: Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Chloride, total Analysis Run 12/9/2019 2:26 PM View: Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Chloride, total Analysis Run 12/9/2019 2:26 PM View: Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Chloride, total Analysis Run 12/9/2019 2:26 PM View: Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Chloride, total Analysis Run 12/9/2019 2:26 PM View: Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Sulfate, total Analysis Run 12/9/2019 2:26 PM View: Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UGHollow symbols indicate censored values.

Constituent: Sulfate, total Analysis Run 12/9/2019 2:26 PM View: InterwellAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Sulfate, total Analysis Run 12/9/2019 2:26 PM View: Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 12/9/2019 2:26 PM View: Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 12/9/2019 2:26 PM View: Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.24 Groundwater Stats Consulting. UG

Constituent: Total Dissolved Solids [TDS] Analysis Run 12/9/2019 2:26 PM View: Interwell Amos BAP Client: Geosyntec Data: Amos BAP

Constituent: Total Dissolved Solids [TDS] Analysis Run 12/9/2019 2:26 PM View: InterwellAmos BAP Client: Geosyntec Data: Amos BAP
FIGURE G: INTERWELL PREDICTION LIMITS

Interwell Prediction Limit Summary Table - All Results

Constituent Mell Vpper Lim. Lower Lim. Date Observ. Sig. Bg N Bg Mean Std. Dev. %NDsND Adj. Transform Alpha Method Boron, total (mg/L) n/a n/a 0.183 n/a n/a 6 future n/a 46 n/a n/a 21.74 n/a n/a 0.0008958 NP Inter (normality) 1 of 2 Calcium, total (mg/L) n/a 19.6 n/a n/a 6 future n/a 48 n/a n/a 0 n/a n/a 0.000818 NP Inter (normality) 1 of 2 Chloride, total (mg/L) n/a n/a 11 n/a n/a 6 future n/a 50 n/a n/a 0 n/a n/a 0.0007403 NP Inter (normality) 1 of 2 Sulfate, total (mg/L) n/a 57.4 n/a n/a 6 future n/a 50 n/a n/a 22 n/a n/a 0.0007403 NP Inter (normality) 1 of 2 Total Dissolved Solids [TDS] (mg/L) n/a 259.6 n/a n/a 6 future n/a 50 165.9 49.25 0 None No 0.001254 Param Inter 1 of 2 Amos BAP Client: Geosyntec Data: Amos BAP Printed 12/9/2019, 2:19 PM

FIGURE H: TOLERANCE LIMITS

Upper Tolerance Limits - App IV

Amos BAP Client: Geosyntec Data: Amos BAP Printed 11/19/2019, 10:33 AM

FIGURE I: GROUNDWATER PROTECTION STANDARDS

Grey cell indicates Background is higher than MCL.

MCL = Maximum Contaminant Level

GWPS - Groundwater Protection Standard

FIGURE J: CONFIDENCE INTERVALS

Confidence Intervals - All Results (No Significant Results)

Amos BAP Client: Geosyntec Data: Amos BAP Printed 12/4/2019, 5:01 PM

Confidence Intervals - All Results (No Significant Results)

Amos BAP Client: Geosyntec Data: Amos BAP Printed 12/4/2019, 5:01 PM

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Antimony, total Analysis Run 12/4/2019 5:00 PM View: Appendix IVAmos BAP Client: Geosyntec Data: Amos BAP

Parametric and Non-Parametric (NP) Confidence IntervalCompliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Arsenic, total Analysis Run 12/4/2019 5:00 PM View: Appendix IVAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Parametric Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

Parametric Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence IntervalCompliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Cadmium, total Analysis Run 12/4/2019 5:00 PM View: Appendix IVAmos BAP Client: Geosyntec Data: Amos BAP

Parametric and Non-Parametric (NP) Confidence IntervalCompliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Chromium, total Analysis Run 12/4/2019 5:00 PM View: Appendix IVAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Fluoride, total Analysis Run 12/4/2019 5:00 PM View: Appendix IVAmos BAP Client: Geosyntec Data: Amos BAP

Compliance Limit is not exceeded. Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

Parametric and Non-Parametric (NP) Confidence Interval

Constituent: Lead, total Analysis Run 12/4/2019 5:00 PM View: Appendix IVAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Constituent: Lithium, total Analysis Run 12/4/2019 5:00 PM View: Appendix IVAmos BAP Client: Geosyntec Data: Amos BAP

Constituent: Mercury, total Analysis Run 12/4/2019 5:00 PM View: Appendix IVAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: Molybdenum, total Analysis Run 12/4/2019 5:00 PM View: Appendix IVAmos BAP Client: Geosyntec Data: Amos BAP

Parametric and Non-Parametric (NP) Confidence Interval

Constituent: Selenium, total Analysis Run 12/4/2019 5:00 PM View: Appendix IVAmos BAP Client: Geosyntec Data: Amos BAP

Sanitas™ v.9.6.23 Groundwater Stats Consulting. UG

Non-Parametric Confidence Interval

APPENDIX 3 – Alternative Source Demonstrations

Not applicable.

Not applicable.

APPENDIX 5 – Well Installation/Decommissioning Logs

Not applicable.

Annual Groundwater Monitoring Report

Appalachian Power Company John E. Amos Plant Fly Ash Pond CCR Management Unit Winfield, West Virginia

January 2020

Prepared by: American Electric Power Service Corporation 1 Riverside Plaza Columbus, Ohio 43215

BOUNDLESS ENERGY"

- **Appendix 1** Groundwater Quality Data, Flow Rates, Flow Directions
- **Appendix 2** Groundwater Quality Data Statistical Analysis
- **Appendix 3** Alternative Source Demonstrations
- **Appendix 4** Notice of Transition between Monitoring Programs
- **Appendix 5** Monitoring Well Installation/Decommissioning Logs

I. Overview

This *Annual Groundwater Monitoring and Corrective Action Report* (Report) has been prepared to report the status of activities for the preceding year for an existing CCR unit at Appalachian Power Company's, a wholly-owned subsidiary of American Electric Power Company (AEP), John E. Amos Power Plant. The USEPA's CCR rules require that the initial Annual Groundwater Monitoring and Corrective Action Report for inactive surface impoundments be posted to the operating record no later than August 1, 2019 and then annually, thereafter. This second Annual Groundwater Monitoring and Corrective Action Report covers all activities required by the CCR Rule through all of 2019.

In general, the following activities were completed:

- Monitoring wells were installed and developed to establish a certified groundwater monitoring system around each CCR unit, in accordance with the requirements of 40 CFR 257.91 pursuant AEP's *Groundwater Monitoring System Design and Construction Certification (April 2019)*;
- Groundwater samples were collected and analyzed for Appendix III and Appendix IV constituents, as specified in 40 CFR 257.94 *et seq.* and AEP's *Groundwater Sampling and Analysis Plan (2016, Revised 2019)*;
- Groundwater data underwent various validation tests, including tests for completeness, valid values, transcription errors, and consistent units;
- Background values for each Appendix III and Appendix IV constituent were established;
- A statistical process in accordance with 40 CFR 257.93 to evaluate groundwater data was prepared, certified, and posted to AEP's CCR website in April 2017. The plan was revised in April 2019 and posted to AEP's CCR website in May 2019. AEP's *Statistical Method Selection Certification (2019*). The statistical process was guided by USEPA's *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance* (*"Unified Guidance", USEPA, 2009*);
- Detection Monitoring sampling was initiated. The initial detection monitoring sampling event resulted in no statistically significant increases (SSIs) of appendix III parameters;
- A second detection monitoring event was completed in the second half of 2019. Results are pending. If potential SSIs are observed, the site will undergo verification sampling per the published *Statistical Method Selection Certification (2019)*.

The major components of this annual report, to the extent applicable at this time, are presented in sections that follow:

 A map, aerial photograph or a drawing showing the CCR management unit(s), all groundwater monitoring wells and monitoring well identification numbers.

- Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a statement as to why that happened, if applicable (**Appendix 5**).
- All of the monitoring data collected, including the rate and direction of groundwater flow, plus a summary showing the number of samples collected per monitoring well, the dates the samples were collected and whether the sample was collected as part of detection monitoring or assessment monitoring programs (**Appendix 1**).
- Results of the required statistical analysis of groundwater monitoring results (**Appendix 2**).
- Discussion of any alternative source demonstrations completed, if applicable (**Appendix 3**).
- A summary of any transition between monitoring programs or an alternate monitoring frequency, for example the date and circumstances for transitioning from detection monitoring to assessment monitoring, in addition to identifying the constituents detected at a statistically significant increase over background concentrations, if applicable (**Appendix 4**).
- Other information required to be included in the annual report such as an alternate monitoring frequency or assessment of corrective measures, if applicable.

In addition, this report summarizes key actions completed, and where applicable, describes any problems encountered and actions taken to resolve those problems. The report includes a projection of key activities for the upcoming year.

II. Groundwater Monitoring Well Locations and Identification Numbers

Figure 1 depicts the PE-certified groundwater monitoring network, the monitoring well locations and their corresponding identification numbers. The groundwater monitoring network has been determined to adequately monitor upgradient, downgradient, and background areas adjacent to the Fly Ash Pond, as detailed in the *Groundwater Monitoring System Design and Construction Certification* that was placed on the AEP CCR public internet site on May 1, 2019. The groundwater quality monitoring network includes the following:

- Five upgradient or sidegradient monitoring wells: MW-1807A, MW-1807B, MW-1808A, MW-1809A, and MW-1810A.
- Ten downgradient monitoring wells: MW-1, MW-2, MW-5, MW-6, MW-7, MW-8, MW-9, MW-1801A, MW-1804A, and MW-1806A.

MW-1807B is screened in the Clarksburg shale to provide background groundwater quality in a deeper secondary groundwater-bearing zone that is hydraulically connected to the uppermost aquifer. Since this monitoring well is not located within the uppermost aquifer or a hydraulically connected aquifer, it is shown only on the site figure and not included in the groundwater flow direction maps.

P:\Projects\AEP\Groundwater Statistical Evaluation - CHA8423\Groundwater Mapping\GIS Files\MXD\Amos\2018\AEP-Amos_FAP_Site_Layout.mxd. ARevezzo. 7/30/2019. CHA8423.

consultants

-
-

Columbus, Ohio 2019/07/30

III. Monitoring Wells Installed or Decommissioned

From November 2017 to July 2018 a total of 22 monitoring wells were installed in order to address gaps in the monitoring well network at the Amos Fly Ash Pond. The network design, as summarized in the *Groundwater Monitoring System Design and Construction Certification* (April 2019) posted at the CCR web site for Amos Plant, details the monitoring well installation activities, boring logs, well construction diagrams, and additional tests that were performed. That design report, viewable on the AEP CCR web site at https://aep.com/environment/ccr, discusses the facility location, the hydrogeological setting, the hydrostratigraphic units, the uppermost aquifer, downgradient monitoring well locations and the upgradient/background monitoring well locations.

IV. Groundwater Quality Data and Static Water Elevation Data, With Flow Rate and Direction Calculations and Discussion

Appendix 1 contains Table 1 which displays the groundwater quality data collected during the establishment of background quality and the first detection monitoring event. **Appendix 1** also contains Table 2 which displays the groundwater velocity and residence time determinations for each completed sampling event, to date. Static water elevation data from each monitoring event are used to develop potentiometric maps and determine the groundwater flow direction for each respective sampling event.

V. Groundwater Quality Data Statistical Analysis

Statistical analysis of the first detection monitoring samples taken in March 2019 was completed in July 2019. There were no statistically significant increases (SSIs) for the Appendix III parameters. **Appendix 2** of this report includes the *Statistical Analysis Summary* (*July 2019*) and the memorandum summarizing the evaluation of the first detection monitoring event data at the Amos Fly Ash Pond. The second detection monitoring event of 2019 is still on-going. Completion of that event and the statistical analysis report will be completed in early 2020.

VI. Discussion About Transition Between Monitoring Requirements or Alternate Monitoring Frequency

As of this annual groundwater report date there has been no transition between detection monitoring and assessment monitoring. Detection monitoring will continue throughout 2020. The sampling frequency of twice per year will be maintained for the Appendix III parameters (boron, calcium, chloride, fluoride, pH, sulfate and total dissolved solids).

Regarding defining an alternate monitoring frequency, the groundwater velocity and monitoring well production is high enough at this facility that no modification of the twice-per-year detection monitoring effort is needed.

VII. Other Information Required

Existing monitoring wells MW-1, MW-2, MW-5, MW-6, MW-8, and MW-9 had the concrete pads replaced during June and July 2019. All other required information is included in this report.

VIII. Description of Any Problems Encountered and Actions Taken

No significant problems were encountered. The low flow sampling effort went smoothly and the schedule was met to support this first annual groundwater report preparation.

IX. A Projection of Key Activities for 2020

Key activities for the upcoming year include:

- Completion of the second 2019 detection monitoring event statistical report;
- Detection monitoring on a twice per year schedule;
- Responding to any new data received in light of what the CCR rule requires; and
- Preparation of the second annual groundwater report.

Tables follow, showing a summary of the number of samples collected per monitoring well and the groundwater monitoring data collected, the groundwater velocity, and the direction of groundwater flow. The dates that the samples were collected also is shown.

Table 1 - Groundwater Data Summary: MW-1 Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1 Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table 1 - Groundwater Data Summary: MW-2 Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-2 Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table 1 - Groundwater Data Summary: MW-5 Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-5 Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table 1 - Groundwater Data Summary: MW-6 Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-6 Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table 1 - Groundwater Data Summary: MW-7 Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-7 Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter
Table 1 - Groundwater Data Summary: MW-8 Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-8 Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-9 Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-9 Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1801A Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1801A Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1801C Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1801C Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1804A Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1804A Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1806A Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1806A Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1807A Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1807A Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1807B Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1807B Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1808A Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1808A Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1809A Amos - FAP Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1809A Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1810A Amos - FAP

Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

Table 1 - Groundwater Data Summary: MW-1810A Amos - FAP Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 2: Residence Time Calculation Summary Amos Fly Ash Pond

Notes:

[1] - Upgradient/Sidegradient Well

[2] - Downgradient Well

The background statistical analysis summary report and the first detection monitoring event statistical analysis determination follow.

STATISTICAL ANALYSIS SUMMARY FLY ASH POND John E. Amos Plant Winfield, West Virginia

Submitted to

1 Riverside Plaza Columbus, Ohio 43215-2372

Submitted by

Geosyntec^o consultants

engineers | scientists | innovators

941 Chatham Lane, Suite 103 Columbus, Ohio 43221

July 15, 2019

CHA8474

TABLE OF CONTENTS

LIST OF TABLES

LIST OF TABLES

LIST OF ATTACHMENTS

LIST OF ACRONYMS AND ABBREVIATIONS

SECTION 1

EXECUTIVE SUMMARY

In accordance with the United States Environmental Protection Agency's (USEPA's) regulations regarding the disposal of coal combustion residuals (CCR) in landfills and surface impoundments (40 CFR 257 Subpart D, "CCR rule"), groundwater monitoring has been conducted at the Fly Ash Pond (FAP), an inactive CCR unit at the John E. Amos Power Plant located in Winfield, West Virginia.

Eight monitoring events were completed to establish background concentrations for Appendix III and Appendix IV parameters under the CCR rule. Groundwater data underwent several validation tests, including those for completeness, sample tracking accuracy, transcription errors, and consistent use of measurement units. No data quality issues were identified which would impact the usability of the data.

The monitoring data were submitted to Groundwater Stats Consulting, LLC for statistical analysis. The background data were reviewed for outliers, which were removed (when appropriate) prior to calculating upper prediction limits (UPLs) for each Appendix III parameter to represent background values.

Certification of the selected statistical methods by a qualified professional engineer is documented in Attachment A.

SECTION 2

FLY ASH POND EVALUATION

2.1 Data Validation & QA/QC

During the background monitoring program, eight sets of samples were collected for analysis from each background and compliance well. A summary of data collected during background monitoring sampling may be found in Table 1.

Chemical analysis was completed by an analytical laboratory certified by the National Environmental Laboratory Accreditation Program (NELAP). Quality assurance and quality control (QA/QC) samples completed by the analytical laboratory included the use of laboratory reagent blanks (LRBs), continuing calibration verification (CCV) samples, and laboratory fortified blanks (LFBs).

The analytical data were imported into a Microsoft Access database, where checks were completed to assess the accuracy of sample location identification and analyte identification. Where necessary, unit conversions were applied to standardize reported units across all sampling events. Exported data files were created for use with the Sanitas™ v.9.6.12 statistics software. The export was checked against the analytical data for transcription errors and completeness. No QA/QC issues were noted which would impact data usability.

2.2 Statistical Analysis

The background data used to conduct the statistical analyses and the detection monitoring data are summarized in Table 1. Statistical analyses for the FAP were conducted in accordance with the April 2019 *Statistical Analysis Plan* (AEP, 2019), except where noted below. Results for all completed statistical tests are provided in Attachment B.

Time series plots of Appendix III and IV parameters are included in Attachment B. Mann-Kendall analyses ($\alpha = 0.01$) were conducted to evaluate trends in the background data. The following statistically significant trends were observed:

- Chloride was found to be significantly decreasing at background well MW-1810A.
- Sulfate was found to be significantly increasing at background well MW-1807B.

No other significant increasing or decreasing trends were observed for other parameters or at other monitoring wells.

2.2.1 Background Outlier Evaluation

Potential outliers were identified using Tukey's outlier test; i.e., data points were considered potential outliers if they met one of the following criteria:

$$
x_i < \tilde{x}_{0.25} - 3 \times IQR \quad (1)
$$
\nor

\n
$$
x_i > \tilde{x}_{0.75} + 3 \times IQR \quad (2)
$$

where:

 $x_i =$ individual data point $\tilde{x}_{0.25}$ = first quartile $\tilde{x}_{0.75}$ = third quartile $IQR =$ the interquartile range $=\tilde{x}_{0.75} - \tilde{x}_{0.25}$

Background well data were first pooled, and Tukey's outlier test was performed on the pooled dataset. For the compliance wells, Tukey's outlier test was applied individually to each compliance well.

Data that were evaluated as potential outliers are summarized in Attachment B. Tukey's outlier test indicated eleven potential outliers, which are summarized in Table 2. Next, the data were reviewed to identify possible sources of errors or discrepancies, including data recording errors, unusual sampling conditions, laboratory quality, or inconsistent sample turbidity. The findings of this data review are summarized below.

The following values were identified as potential outliers:

- The antimony concentration of 0.0005 mg/L from the February 22, 2019 sample at MW-1810A;
- The antimony concentration of 0.00087 mg/L from the August 28, 2018 sample at MW-1807A;
- The barium concentration of 0.124 mg/L from the July 26, 2018 sample at MW-1810A;
- The boron concentration of 0.213 mg/L from the November 13, 2018 sample at MW-1806A;
- The calcium concentration of 47.4 mg/L from the January 25, 2019 sample at MW-1808A;
- The chloride concentration of 14.6 mg/L from the January 23, 2019 sample at MW-1;
- The chromium concentration of 0.000583 mg/L from the November 13, 2018 sample at MW-1;
- The pH value of 5.12 SU from the January 25, 2019 sample at FAP-MW-1809A;
- The selenium concentration of 0.001 mg/L from the February 22, 2019 sample at MW-1810A;
- The sulfate concentration of 55.9 mg/L from the January 23,2019 sample at MW-1; and,
- The sulfate concentration of 33.2 mg/L from the November 13, 2018 sample at MW-7.

These values were similar to other observed concentrations within the wells or in neighboring wells, or otherwise represented non-detect results. Therefore, they were not removed from the dataset.

2.2.2 Establishment of Background Levels

Analysis of variance (ANOVA) was conducted to determine whether spatial variation was present among the five background wells (Attachment B). ANOVA indicated significant variation among the five background wells for all Appendix III parameters. Therefore, the appropriateness of using intrawell tests was evaluated for these parameters at the Amos FAP.

Intrawell tests presume that the groundwater quality in the compliance wells was not initially impacted by the CCR unit. To test this presumption, the data from the background wells were pooled, and the data from each compliance well were compared to a pooled background value. Tolerance limits were calculated using the pooled background data for each Appendix III parameter. Parametric tolerance limits with 99% confidence and 95% coverage were calculated for boron, chloride, pH, and TDS; non-parametric tolerance limits were calculated for calcium, fluoride, and sulfate, given that apparent non-normal distributions of data were observed for these three parameters. Confidence intervals were calculated for each of these seven parameters at each compliance monitoring well. If the lower confidence limit from a compliance well exceeded the upper tolerance limit for the pooled background data, it was concluded that groundwater concentrations at compliance wells were above background concentrations. In these instances, intrawell tests would not be appropriate.

Based on this statistical screening, intrawell methods would be recommended for calcium, pH, and sulfate and interwell methods would be recommended for boron, chloride, fluoride, and TDS. However, a review of site geochemistry identified differences in groundwater composition between upgradient and downgradient wells, which suggest differences in mineral make-up due to natural variation. These differences are illustrated in a Schoeller diagram (Figure 1), which compares the concentrations of major cations and anions at each well. The concentration units are milliequivalents per liter (meq/L), which allows the major ions to be compared on a chargeequivalent basis (the sum of the cations must equal the sum of the anions). Note that the concentrations are expressed in on a log scale, which moderates the fact that the concentrations

range over several orders of magnitude. The diagram shows that several of the upgradient wells have significantly different geochemistry, with higher proportions of calcium, magnesium, and sulfate than the downgradient monitoring locations. Conversely, many of the downgradient groundwaters are high in sodium but are lower in calcium and magnesium. However, bicarbonate (HCO₃⁻) concentrations tend to be similar for all groundwater, indicating that carbonate minerals (particularly calcite) are present throughout the area. If interwell statistical methods were used without consideration for these wide ranges in groundwater composition, which appear due to natural geochemical variation, the net outcome could result in false negatives or false positives. Therefore, intrawell tests were used to evaluate potential statistically significant increases (SSIs) for all Appendix III parameters.

After equality of variance was tested and identified outliers were removed (where appropriate), a parametric or non-parametric analysis was selected based on the distribution of the data and the frequency of non-detect data. Estimated results less than the practical quantitation limit (PQL) – i.e., "J-flagged" data – were considered detections and the estimated results were used in the statistical analyses. Non-parametric analyses were selected for datasets with at least 50% nondetect data or datasets that could not be normalized. Parametric analyses were selected for datasets (either transformed or untransformed) that passed the Shapiro-Wilk / Shapiro-Francía test for normality. The Kaplan-Meier non-detect adjustment was applied to datasets with between 15% and 50% non-detect data. For datasets with fewer than 15% non-detect data, non-detect data were replaced with one half of the PQL. The selected analysis (i.e., parametric or non-parametric) and transformation (where applicable) for each background dataset are shown in Attachment B.

Upper prediction limits (UPLs) were calculated for each Appendix III parameter to represent background values. A lower prediction limit (LPL) was also calculated for pH. To conduct the intrawell tests for the Appendix III parameters, a separate UPL was calculated for each compliance well for each of these parameters. The background data used for the UPL calculations are summarized in Table 1; the calculated UPLs are summarized in Table 3.

Although a significant decreasing trend in chloride concentrations was observed at background well MW-1810A and a significant increasing trend in sulfate concentrations was observed at background well MW-1807B, the UPLs were calculated as if no trend were present; i.e., the data were not limited to more recent data and were pooled with other background wells. This was done because the magnitudes of the trends are low relative to absolute concentrations, and the concentrations of chloride and sulfate at MW-1810A and MW-1807B, respectively, are similar to concentrations at other background wells. The possibility of an ongoing trend and the need for truncating the datasets for chloride at MW-1810A and sulfate at MW-1807B will be reevaluated after additional data are collected.

UPLs were calculated for a one-of-three retesting procedure; i.e., if at least one sample in a series of three does not exceed the UPL, then it can be concluded that an SSI has not occurred. In practice, where initial or secondary results did not exceed the UPL, a subsequent sample was not collected. The one-of-three retesting procedure allowed achieving an acceptably high statistical power while maintaining a site-wide false-positive rate (SWFPR) of 10% per year or less. Power

curves were constructed for the intrawell parametric tests and are compared with the EPA Reference Power Curve in Attachment B. The power curve associated with the intrawell tests for the FAP exceeds the EPA Reference Power Curve at 3 and 4 standard deviations; this is considered a "good" level of statistical power according to USEPA's *Unified Guidance* (USEPA, 2009).

2.3 Conclusions

Eight background monitoring events were completed in accordance with the CCR Rule. The laboratory and field data were reviewed prior to statistical analysis, with no QA/QC issues identified that impacted data usability. A review of outliers identified eleven potential outliers; however, no values were removed from the dataset. Prediction intervals were constructed based on the background data and a one-of-three retesting procedure. Intrawell tests were selected for all Appendix III parameters based on a review of site geochemistry.
SECTION 3

REFERENCES

American Electric Power (AEP). 2019. Statistical Analysis Plan – Amos Plant. April 2019.

United States Environmental Protection Agency (USEPA). 2009. Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities – Unified Guidance. EPA 530/R-09-007. March 2009.

TABLES

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Notes:

µg/L: micrograms per liter

mg/L: milligrams per liter

pCi/L: picocuries per liter

SU: standard unit

U: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL).

J: Estimated value. Parameter was detected in concentrations below the reporting limit.

-: Not sampled

Table 2: Outlier Analysis Summary Amos Plant - Fly Ash Pond

Table 3: Background Level Summary Amos Plant - Fly Ash Pond

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

FIGURES

nternal info: path, date revised, author

ATTACHMENT A Certification by Qualified Professional Engineer

Certification by Qualified Professional Engineer

I certify that the selected and above described statistical method is appropriate for evaluating the groundwater monitoring data for the Amos Fly Ash Pond CCR management area and that the requirements of 40 CFR 257.93(f) have been met.

DAVID ANTHONY MILLER

Printed Name of Licensed Professional Engineer

aird Anthony Miller

Signature

22663

License Number

WEST VIRGINIA

Licensing State

 $07.15.19$

Date

ATTACHMENT B Statistical Analysis Output

GROUNDWATER STATS CONSULTING

July 14, 2019

Geosyntec Consultants Attn: Ms. Allison Kreinberg 941 Chatham Lane, #103 Columbus, OH 43221

Re: Amos Fly Ash Pond (FAP) Background Screening

Groundwater Stats Consulting, formerly the statistical consulting division of Sanitas Technologies, is pleased to provide the screening and statistical analysis of background groundwater data for American Electric Power Company's Amos Fly Ash Pond (FAP). The analysis complies with the federal rule for the Disposal of Coal Combustion Residuals from Electric Utilities (CCR Rule, 2015) as well as with the USEPA Unified Guidance (2009).

Sampling began for the CCR program in 2018, and 8 background samples have been collected at each of the groundwater monitoring wells. The monitoring well network, as provided by Geosyntec Consultants, consists of the following:

- Upgradient Wells: FAP-MW-1807A, FAP-MW-1807B, FAP-MW-1808A, FAP-MW-1809A, and FAP-MW-1810A
- Downgradient Wells: FAP-MW-1, FAP-MW-2, FAP-MW-5, FAP-MW-7, FAP-MW-8, FAP-MW-6, FAP-MW-9, FAP-MW-1801A, FAP-MW-1804A; and FAP-MW-1806A

Data were sent electronically to Groundwater Stats Consulting, and the statistical analysis was reviewed by Dr. Kirk Cameron, PhD Statistician with MacStat Consulting, primary author of the USEPA Unified Guidance, and by Dr. Jim Loftis, Civil & Environmental Engineering professor emeritus at Colorado State University, both Senior Advisors to Groundwater Stats Consulting.

The following constituents were evaluated: Appendix III parameters – boron, calcium, chloride, fluoride, pH, sulfate, and TDS; and Appendix IV parameters - antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, combined radium 226 & 228, fluoride, lead, lithium, mercury, molybdenum, selenium, and thallium.

Time series plots for Appendix III and IV parameters at all wells are provided for the purpose of screening data at these wells (Figure A). Additionally, box plots are included for all constituents at upgradient and downgradient wells (Figure B). The time series plots are used to initially screen for suspected outliers and trends, while the box plots provide visual representation of variation within individual wells and between all wells.

Data at all wells were evaluated for the following: 1) outliers; 2) trends; 3) most appropriate statistical method for Appendix III parameters based on site characteristics of groundwater data upgradient of the facility; and 4) eligibility of downgradient wells when intrawell statistical methods are recommended. Power curves are provided to demonstrate that the selected statistical methods for Appendix III parameters comply with the USEPA Unified Guidance recommendations as discussed below.

Summary of Statistical Method:

1) Intrawell prediction limits, combined with a 1-of-3 resample plan for all Appendix III parameters.

Parametric prediction limits are utilized when the screened historical data follow a normal or transformed-normal distribution. When data cannot be normalized or the majority of data are nondetects, a nonparametric test is utilized. The distribution of data is tested using the Shapiro-Wilk/Shapiro-Francia test for normality. After testing for normality and performing any adjustments as discussed below (US EPA, 2009), data are analyzed using either parametric or non-parametric prediction limits.

- No statistical analyses are required on wells and analytes containing 100% nondetects (USEPA Unified Guidance, 2009, Chapter 6).
- When data contain <15% nondetects in background, simple substitution of onehalf the reporting limit is utilized in the statistical analysis. The reporting limit utilized for nondetects is the practical quantification limit (PQL) as reported by the laboratory.
- When data contain between 15-50% nondetects, the Kaplan-Meier nondetect adjustment is applied to the background data. This technique adjusts the mean and standard deviation of the historical concentrations to account for concentrations below the reporting limit.

 Nonparametric prediction limits are used on data containing greater than 50% nondetects.

Background Screening

Outlier Evaluation

Time series plots are used to identify suspected outliers, or extreme values that would result in limits that are not conservative from a regulatory perspective, in proposed background data. Suspected outliers at all wells for Appendix III and Appendix IV parameters were formally tested using Tukey's box plot method and, when identified, flagged in the computer database with "o" and deselected prior to construction of statistical limits (Figure C).

Using the Tukey box plot method, several values were identified as possible outliers. A summary of those findings is included with the tests (Figure C). Typically, when the most recent value is identified as an outlier, values are not flagged in the database at this time as they may represent a possible trend. If future values do not remain at similar concentrations, these values will be flagged as outliers and deselected. In this particular case, the values identified were reported nondetects requiring no further action. Several low values exist in the data sets and appear on the graphs as possible low outliers relative to the laboratory's Practical Quantitation Limit. However, these values are observed trace values (i.e. measurements reported by the laboratory between the Method Detection Limit and the Practical Quantitation Limit) and, therefore, were not flagged as outliers.

Of the outliers identified by Tukey's method, none of the values were flagged as all observations are similar to remaining measurements within a given well or neighboring wells, or were reported nondetects. If values are flagged as outliers in the future, a list of those values will be included with the Tukey test results in Figure C. Additionally, these values would be plotted in a disconnected and lighter symbol on the time series graph. The accompanying data pages will display the flagged value in a lighter font as well. A substitution of the most recent reporting limit was applied when varying detection limits existed in data. When the reporting limit is higher than the CCR-rule specified levels (40 CFR 257.95(h)) for parameters without Maximum Contaminant Levels as discussed below, nondetects are substituted with one half the reporting limit.

No seasonal patterns were observed on the time series plots for any of the detected data; therefore, no deseasonalizing adjustments were made to the data. When seasonal patterns are observed, data may be deseasonalized so that the resulting limits will correctly account for the seasonality as a predictable pattern rather than random variation or a release.

While trends may be visually apparent, a quantification of the trend and its significance is needed. The Sen's Slope/Mann Kendall trend test was used to evaluate all data at each well to identify statistically significant increasing or decreasing trends (Figure D). In the absence of suspected contamination, significant trending data are typically not included as part of the background data used for construction of prediction limits. This step serves to eliminate the trend and, thus, reduce variation in background. When statistically significant decreasing trends are present, earlier data are evaluated to determine whether earlier concentration levels are significantly different than current reported concentrations and will be deselected as necessary. When the historical records of data are truncated for the reasons above, a summary report will be provided to show the date ranges used in construction of the statistical limits.

The results of the trend analyses showed a statistically significant decreasing trend for chloride and an increasing trend for sulfate as may be seen on the Trend Test Summary Table that accompanies the trend tests. Both of these trends are relatively low in magnitude when compared to average concentrations within these wells. Additionally, the short background period of record makes it difficult to separate trends from normal year-to-year variation. Therefore, no adjustments were made to the data sets.

Appendix III – Determination of Spatial Variation

The Analysis of Variance (ANOVA) was used to statistically evaluate differences in average concentrations among upgradient wells, which assists in identifying the most appropriate statistical approach (Figure E). Interwell tests, which compare downgradient well data to statistical limits constructed from pooled upgradient well data, are appropriate when average concentrations are similar across upgradient wells. Intrawell tests, which compare compliance data from a single well to screened historical data within the same well, are appropriate when upgradient wells exhibit spatial variation; when statistical limits constructed from upgradient wells would not be conservative from a regulatory perspective; and when downgradient water quality is unimpacted compared to upgradient water quality for the same parameter.

The ANOVA identified variation among upgradient well data for all of the Appendix III parameters. Therefore, all other data were further evaluated as described for the appropriateness of intrawell testing to accommodate the groundwater quality. A summary table of the ANOVA results is included with the reports.

Appendix III - Statistical Limits

Intrawell limits constructed from carefully screened background data from within each well serve to provide statistical limits that are conservative (i.e. lower) from a regulatory perspective, and that will rapidly identify a change in more recent compliance data from within a given well. This statistical method removes the element of variation from across wells and eliminates the chance of mistaking natural spatial variation for a release from the facility. Prior to performing intrawell prediction limits, several steps are required to reasonably demonstrate downgradient water quality does not have existing impacts from the practices of the facility.

Exploratory data analysis was used as a general comparison of concentrations in downgradient wells for all Appendix III parameters recommended for intrawell analyses to concentrations reported in upgradient wells. Upper tolerance limits are used in conjunction with confidence intervals to determine whether the estimated averages in downgradient wells are higher than observed levels upgradient of the facility. The upper tolerance limits were constructed to represent the extreme upper range of possible background levels at the site.

In cases where downgradient average concentrations are higher than observed concentrations upgradient for a given constituent, an independent study and hydrogeological investigation would be required to identify local geochemical conditions and expected groundwater quality for the region to justify an intrawell approach. Such an assessment is beyond the scope of services provided by Groundwater Stats Consulting. When there is not an obvious explanation for observed concentration differences in downgradient wells relative to reported concentrations in upgradient wells, interwell prediction limits are in most cases selected for the statistical method until further evidence shows that concentrations are due to natural variation rather than a result of the facility. A special situation occurs, however, at this site and is discussed below.

For normal or transformed normal data, parametric tolerance limits were constructed with a target of 99% confidence and 95% coverage using pooled upgradient well data for each of the Appendix III parameters recommended for intrawell analyses (Figure F). In cases where transformations cannot achieve normality, nonparametric tolerance limits are used. The confidence and coverage levels for nonparametric tolerance limits are dependent upon the number of background samples. As more data are collected, the background population is better represented, and the confidence and coverage levels increase.

Confidence intervals were constructed on downgradient wells for each of the Appendix III parameters using the tolerance limits discussed above, to determine intrawell eligibility for those parameters exhibiting spatial variation (Figure G). When the entire confidence interval is above a background standard for a given parameter, interwell methods are initially recommended as the statistical method. Therefore, only parameters with confidence intervals which did not exceed background standards are eligible for intrawell prediction limits.

Confidence intervals for the Appendix III parameters (boron, calcium, chloride, fluoride, pH, sulfate and TDS) were found to be within their respective background limit for calcium, pH and sulfate; while the confidence intervals for boron, chloride, fluoride and TDS were above the background standards for one or more downgradient wells. Based on the statistical screening, intrawell methods would be recommended for calcium, pH and sulfate, and interwell methods would be recommended for boron, chloride, fluoride and TDS. However, supporting documentation provided by Geosyntec Consultants demonstrates that a review of the geochemistry at the site found two different types of groundwater chemistry between the upgradient and downgradient wells, indicating that interwell methods would lead to either false positive (identifying impacts when there are none) or false negative (not identifying impacts to groundwater when present in downgradient wells) results. Therefore, intrawell prediction limits are recommended presently for all Appendix III parameters.

In cases where downgradient average concentrations are higher than observed concentrations upgradient for a given constituent and in cases of unexplained increasing trends in downgradient concentrations, an independent study and hydrogeological investigation would be required to identify local geochemical conditions and expected groundwater quality for the region to conclusively validate an intrawell approach. This method assumes that practices at the site are not influencing background groundwater quality downgradient of the site. If background water quality has historically been affected by the facility, the intrawell limits will serve to detect changes from current, impacted conditions rather than to initially identify such impacts.

All available data through February 2019 for Appendix III parameters at each well were used to establish intrawell background limits based on a 1-of-3 resample plan that will be used for future comparisons (Figure H). Intrawell methods construct statistical limits from historical data within a given well for comparison of future data at the same well.

Natural systems continuously evolve due to physical changes made to the environment. Examples include capping a landfill, paving areas near a well, or lining a drainage channel to prevent erosion. Periodic updating of background statistical limits will be necessary to accommodate these types of changes. In the intrawell case, data for all wells and constituents are re-evaluated when a minimum of 4 new data points are available to determine whether earlier concentrations are representative of present-day groundwater quality. In some cases, the earlier portion of data are deselected prior to construction of limits in order to provide sensitive limits that will rapidly detect changes in groundwater quality. Even though the data are excluded from the calculation, the values will continue to be reported and shown in tables and graphs. As more data are collected, the resample plan will be re-evaluated for appropriateness of the 1-of-2 plan for intrawell analyses.

In the event of an initial exceedance of compliance well data, the 1-of-3 resample plan allows for collection of up to two additional samples to determine whether the initial exceedance is confirmed. When both resamples confirm the initial exceedance, a statistically significant increase (SSI) is identified and further research would be required to identify the cause of the exceedance (i.e. impact from the site, natural variation, or an off-site source). In the 1-of-2 resample plan, one additional sample may be collected to confirm the initial exceedance. If the resample falls within the statistical limit, the initial exceedance is considered to be a false positive result and, therefore, no further action is necessary. A summary table of the background prediction limits follows this letter.

Appendix IV – Assessment Monitoring Program

During an Assessment Monitoring program, confidence intervals are constructed at all wells for detected Appendix IV parameters and compared to a Groundwater Protection Standard (GWPS). A minimum of 4 samples is required to construct confidence intervals; however, 8 samples are recommended for better representation of the true average population. The GWPS includes the established Maximum Contaminant Levels (MCLs), the CCR-rule specified levels for parameters without MCLs (cobalt, lead, lithium and molybdenum), or background as discussed below. Parametric confidence intervals are constructed with 99% confidence when data follow a normal or transformed-normal distribution. For all other cases, nonparametric confidence intervals are constructed, with the confidence level based on the number of samples available. The GWPS is exceeded only when the entire confidence interval exceeds its respective GWPS.

Background limits are established for the Appendix IV parameters using upper tolerance limits constructed with 95% confidence/95% coverage for normally distributed data, using all upgradient well data, for comparison against established MCLs. When background limits, or Alternate Contaminant Levels (ACLs), are higher than established MCLs or CCRrule specified limits, the CCR Rule recommends using these ACLs as the GWPS for the confidence interval comparisons. Since the scope of this project included screening and development of background limits for Appendix III Detection Monitoring statistics, no confidence intervals were constructed in this report.

Recommendations

In summary, as a result of the background screening described in this letter, intrawell prediction limits combined with a 1-of-3 resample plan are recommended for all Appendix III parameters. The statistical analyses will be constructed according to the USEPA Unified Guidance, based on 7 Appendix III parameters and 10 downgradient wells.

Thank you for the opportunity to assist you in the statistical analysis of groundwater quality for the Amos Fly Ash Pond. If you have any questions or comments, please feel free to contact me.

For Groundwater Stats Consulting,

ristina Rayner

Kristina L. Rayner Groundwater Statistician

FIGURE A: TIME SERIES

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Antimony Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Antimony Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Arsenic Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Arsenic Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Barium Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Beryllium Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Beryllium Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Constituent: Boron Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Time Series

Constituent: Boron Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Cadmium Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Cadmium Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Chloride Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Chromium Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Chromium Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Cobalt Analysis Run 4/18/2019 10:04 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Fluoride Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

0.009 \leftarrow FAP-MW-1809A (bg) **FAP-MW-1810A (bg)** 0.0072 **•** FAP-MW-1807A (bg) ▲ FAP-MW-1808A (bg) 0.0054 \blacktriangledown FAP-MW-1807B (bg) $\frac{1}{2}$ and $\frac{1}{2}$ a FAP-MW-9 0.0036 FAP-MW-1801A п \bullet FAP-MW-1804A 0.0018 Ω 7/24/18 9/4/18 10/17/18 11/28/18 1/10/19 2/22/19

Time Series

Constituent: Lead Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Lead Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Lithium Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Mercury Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Mercury Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Molybdenum Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Time Series

Time Series

Constituent: pH Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: pH Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Selenium Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

Constituent: Sulfate Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Sulfate Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Constituent: Thallium Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Time Series

2000

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

◆ FAP-MW-1809A (bg) **FAP-MW-1810A (bg)**

Time Series

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Time Series

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 10:05 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

FIGURE B: BOX PLOTS

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Antimony Analysis Run 4/18/2019 10:19 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Antimony Analysis Run 4/18/2019 10:19 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Arsenic Analysis Run 4/18/2019 10:19 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Box & Whiskers Plot

Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Barium Analysis Run 4/18/2019 10:19 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Beryllium Analysis Run 4/18/2019 10:19 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Box & Whiskers Plot

Constituent: Boron Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Boron Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Cadmium Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Cadmium Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Box & Whiskers Plot

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Box & Whiskers Plot

Constituent: Calcium Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Chloride Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Box & Whiskers Plot

Box & Whiskers Plot

Constituent: Chromium Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Cobalt Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Box & Whiskers Plot

Box & Whiskers Plot

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Fluoride Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Box & Whiskers Plot

Box & Whiskers Plot

Constituent: Lead Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Lithium Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Box & Whiskers Plot

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Mercury Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Mercury Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Box & Whiskers Plot

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

10

Box & Whiskers Plot

 \blacksquare

Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Selenium Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Box & Whiskers Plot

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Sulfate Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Sulfate Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Thallium Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Thallium Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Box & Whiskers Plot

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Box & Whiskers Plot

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 10:20 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Box & Whiskers Plot

FIGURE C: TUKEY'S OUTLIER TESTS

Outlier Analysis - Significant Results

Amos FAP Client: Geosyntec Data: Amos FAP Printed 4/18/2019, 5:07 AM

Amos FAP Client: Geosyntec Data: Amos FAP Printed 4/18/2019, 5:07 AM

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Antimony Analysis Run 4/18/2019 4:51 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

No outliers found. Tukey's method selected by user.

 $n = 8$

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.02461, low cutoff = 0.00001369, based on IQR multiplier $of 3.$

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Antimony Analysis Run 4/18/2019 4:51 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Antimony Analysis Run 4/18/2019 4:51 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Antimony Analysis Run 4/18/2019 4:51 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$ No outliers found. Tukey's method selected by user.

Ladder of Powers transformations did not improve normality; analysis run on raw data.

High cutoff = 0.00084 low cutoff = -0.00042, based on IQR multiplier \overline{of} 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$ No outliers found. Tukey's method selected by user.

Data were cube root transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.001687, low cutoff = 1.9e-8, based on IQR multiplier of 3.

Constituent: Antimony Analysis Run 4/18/2019 4:51 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

n = 8

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.007135, low cutoff = 0.001309 based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Ω 0.00018 0.00036 0.00054 0.00072 0.0009 7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/22/19 Tukey's Outlier Screening FAP-MW-1810A (bg) Constituent: Arsenic Analysis Run 4/18/2019 4:51 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP $\frac{1}{2}$ and $\frac{1}{2}$ a $n = 8$ No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units). High cutoff = 0.001063 . low cutoff = 0.0002047, based on IQR multiplier of 3. Ω 0.0004 0.0008 0.0012 0.0016 0.002 7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/21/19 Tukey's Outlier Screening FAP-MW-1807A (bg) Constituent: Arsenic Analysis Run 4/18/2019 4:51 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP $\frac{1}{2}$ and $\frac{1}{2}$

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.001746 . low cutoff = 0.0005255 , based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Arsenic Analysis Run 4/18/2019 4:51 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Arsenic Analysis Run 4/18/2019 4:51 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Arsenic Analysis Run 4/18/2019 4:51 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

n = 8

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.006794, low cutoff = 0.004291 based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Barium Analysis Run 4/18/2019 4:51 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$ Outlier is drawn as solid. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.1041 . $low cutoff = 0.07068,$ based on IQR multiplier \overline{of} 3.
Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Ω 7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/21/19 Tukey's Outlier Screening FAP-MW-1807A (bg) Constituent: Barium Analysis Run 4/18/2019 4:51 AM View: Descriptive $\frac{1}{\sqrt{2}}$, $\frac{1}{\sqrt{2}}$ $n = 8$ No outliers found. Tukey's method selected by user. Data were square transformed to achieve best W statistic (graph shown in original units). High cutoff = 0.04065, low cutoff = 0.009698, based on IQR multiplier of 3. Ω 0.022 0.044 0.066 0.088 0.11 7/25/18 9/5/18 10/17/18 11/28/18 1/9/19 2/21/19 Tukey's Outlier Screening FAP-MW-1808A (bg) Constituent: Barium Analysis Run 4/18/2019 4:51 AM View: Descriptive $\frac{1}{\sqrt{2}}$, and the contract of $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.1254 . $low cutoff = 0.05229$, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

0.008

0.016

0.024

0.032

0.04

Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Barium Analysis Run 4/18/2019 4:51 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

No outliers found.

Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.07182, low cutoff = 0.02929 based on IQR multiplier of 3.

Constituent: Barium Analysis Run 4/18/2019 4:51 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Ω 0.012 0.024 0.036 0.048 0.06 7/24/18 9/4/18 10/16/18 11/27/18 1/8/19 2/20/19 Tukey's Outlier Screening FAP-MW-1801A Constituent: Barium Analysis Run 4/18/2019 4:51 AM View: Descriptive $\frac{1}{\sqrt{2}}$, $\frac{1}{\sqrt{2}}$ $n = 8$ No outliers found. Tukey's method selected by user. Data were x^6 transformed to achieve best W statistic (graph shown in original units). High cutoff = 0.06451 . low cutoff = -0.05299, based on IQR multiplier of 3. Ω 0.08 0.16 0.24 0.32 0.4 7/27/18 9/6/18 10/18/18 11/29/18 1/10/19 2/21/19 Tukey's Outlier Screening FAP-MW-1804A Constituent: Barium Analysis Run 4/18/2019 4:52 AM View: Descriptive \mathbb{R} and \mathbb{R} and

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 1.062, low cutoff = 0.02799, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Barium Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Amos FAP Client: Geosyntec Data: Amos FAP

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.2237 , low cutoff $= 0.15$, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Barium Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

n = 8

No outliers found. Tukey's method selected by user.

Data were square root transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.101, low cutoff = 0.04645, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Beryllium Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Beryllium Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph

 $n = 8$

shown in original units). High cutoff = 0.6988, low cutoff = 3.2e-8, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Beryllium Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Beryllium Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Beryllium Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

No outliers found. Tukey's method selected by user. Data were cube root trans-

formed to achieve best W statistic (graph shown in original units).

High cutoff = 0.001255 . low cutoff = -0.00004474, based on IQR multiplier

Ω 0.04 0.08 0.12 0.16 0.2 7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/22/19 Tukey's Outlier Screening FAP-MW-1809A (bg) Constituent: Boron Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP $\frac{1}{2}$ and $\sqrt{2}$ $n = 8$ No outliers found. Tukey's method selected by user. Ladder of Powers transformations did not improve normality; analysis run on raw data. High cutoff = 0.122, low cutoff = 0.0485, based on IQR multiplier of 3. Ω 0.08 0.16 0.24 0.32 0.4 7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/22/19 Tukey's Outlier Screening FAP-MW-1810A (bg) Constituent: Boron Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP \mathbb{R} and \mathbb{R} and

No outliers found. Tukey's method selected by user.

 $n = 8$

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.4408, low cutoff = 0.126, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Boron Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

n = 8 No outliers found. Tukey's method selected by user.

Data were square transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.2634 . low cutoff = -0.1518, based on IQR multiplier \overline{of} 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/21/19 Tukey's Outlier Screening FAP-MW-1807B (bg) $\frac{1}{\sqrt{2}}$, and the contract of $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$ $n = 8$ No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units). High cutoff = 0.3538, low cutoff = 0.1001, based on IQR multiplier of 3. Ω 0.04 0.08 0.12 0.16 0.2 7/26/18 9/5/18 10/17/18 11/28/18 1/9/19 2/20/19 Tukey's Outlier Screening FAP-MW-9 $\frac{1}{\sqrt{2}}$, and the contract of $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$

Constituent: Boron Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Boron Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 Ω

0.06

0.12

0.18

0.24

0.3

Constituent: Boron Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

 $n = 8$ No outliers found.

Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.2471 . $low cutoff = 0.07815$, based on IQR multiplier of 3.

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 1.316, low cutoff = 0.3831, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

No outliers found. Tukey's method selected by user.

 $n = 8$

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.4842, low cutoff = 0.1448, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Boron Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Boron Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Cadmium Analysis Run 4/18/2019 4:52 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Cadmium Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

No outliers found. Tukey's method selected by user.

 $n = 8$

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.000559, low cutoff = 0.000002 based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Cadmium Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.00221 . low cutoff = 3.2e-7, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Calcium Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Calcium Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

 $n = 8$

No outliers found. Tukey's method selected by user.

transformed to achieve best W statistic (graph shown in original units). High cutoff = 57.99, low cutoff = 12.6, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Calcium Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 2.234, low cutoff = 0.5763, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Tukey's Outlier Screening

Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Calcium Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$

 $n = 8$ No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units). High cutoff = 234.2, low $\text{cutoff} = 0.8556$, based on IQR multiplier of 3.

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 5.101, low cutoff = 3.159, based on IQR multiplier of 3.

No outliers found. Tukey's method selected by user.

 $n = 8$

Data were x^6 transformed to achieve best W statistic (graph shown in original units).

High cutoff = 7.578, low cutoff = 3.699, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Calcium Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were square root transformed to achieve best W statistic (graph shown in original units).

High cutoff = 3.343, low cutoff = 1.52, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Tukey's Outlier Screening

Constituent: Calcium Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Chloride Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chloride Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

No outliers found. Tukey's method select-

Data were square transformed to achieve best W statistic (graph shown

High cutoff = 16.33 , low cutoff = -5.027, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Ω 6 12 18 24 30 7/25/18 9/5/18 10/17/18 11/28/18 1/9/19 2/21/19 Tukey's Outlier Screening FAP-MW-1808A (bg) Constituent: Chloride Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP $\frac{1}{\sqrt{2}}$, $\frac{1}{\sqrt{2}}$ $n = 8$ No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units). High cutoff = 28.17, low cutoff = 11.94, based on IQR multiplier of 3. Ω 4 8 12 16 20 7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/21/19 Tukey's Outlier Screening FAP-MW-1807B (bg) Constituent: Chloride Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP $\frac{1}{2}$ and $\frac{1}{2}$ a

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 17.55, low cutoff = 4.625, based on IQR multiplier of 3.

Constituent: Chloride Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

20 Tukey's Outlier Screening FAP-MW-1806A

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 119, low cutoff = 0.7757, based on IQR multiplier of 3.

Tukey's Outlier Screening

Constituent: Chloride Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chloride Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chloride Analysis Run 4/18/2019 4:53 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chromium Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chromium Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$ No outliers found. Tukey's method selected by user.

Ladder of Powers transformations did not improve normality; analysis run on raw data.

High cutoff = 0.0005 . $\frac{1}{9}$ low cutoff = -0.0002 , based on IQR multiplier \overline{of} 3.

No outliers found. Tukey's method selected by user.

 $n = 8$

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.00456, low cutoff = 0.00001917, based on IQR multiplier $of 3.$

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chromium Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.01167 l ow cutoff = 0.000004062 , based on IQR multiplier

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Chromium Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.001167, low cutoff = 0.0002079 based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Tukey's Outlier Screening FAP-MW-1810A (bg) $\frac{1}{2}$ and $\frac{1}{2}$ a $n = 8$ No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units). High cutoff = 0.00288, low cutoff = 4.8e-7, based on IQR multiplier of 3. 0.0002 0.0004 0.0006 0.0008 0.001 Tukey's Outlier Screening FAP-MW-1807A (bg) $\frac{1}{\sqrt{2}}$, and the contract of $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.001667 . low cutoff = 0.0002757 , based on IQR multiplier of 3.

 Ω

0.00004

0.00008

0.00012

0.00016

0.0002

7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/22/19

Constituent: Cobalt Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Cobalt Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 Ω

7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/21/19

Constituent: Cobalt Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Cobalt Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$ No outliers found. Tukey's method selected by user.

Ladder of Powers transformations did not improve normality; analysis run on raw data.

High cutoff = 0.0004215 . low cutoff = -0.000184, based on IQR multiplier \overline{of} 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Cobalt Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$ No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.0009615 low cutoff = 0.000001619, based on IQR multiplier

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$ No outliers found. Tukey's method select-

Ladder of Powers transformations did not improve normality; analy-

High cutoff = 2.248 , low cutoff = -0.857, based on IQR multiplier of 3.

Tukey's Outlier Screening

 $n = 8$ No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units). High cutoff = 79.41, low cutoff = 0.02251, based on IQR multiplier of 3.

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 4:54 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 4:54 AM View: Descriptive

Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

 $n = 8$ No outliers found. Tukey's method select-

ed by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 17.5, low cutoff = 0.0351, based on IQR multiplier of 3.

Constituent: Combined Radium 226 + 228 Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Fluoride Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

in original units). High cutoff = 0.2088, low cutoff = 0.04, based on IQR multiplier of 3.

 $n = 8$ No outliers found. Tukey's method selected by user. Data were square transformed to achieve best W statistic (graph shown

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Ω 0.12 0.24 0.36 0.48 0.6 7/25/18 9/5/18 10/17/18 11/28/18 1/9/19 2/21/19 Tukey's Outlier Screening FAP-MW-1808A (bg) Constituent: Fluoride Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP $\frac{1}{\sqrt{2}}$, $\frac{1}{\sqrt{2}}$ $n = 8$ No outliers found. Tukey's method selected by user. Data were x^4 transformed to achieve best W statistic (graph shown in original units). High cutoff = 0.706, low cutoff = -0.6108, based on IQR multiplier of 3. Ω 0.4 0.8 1.2 1.6 2 7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/21/19 Tukey's Outlier Screening FAP-MW-1807B (bg) Constituent: Fluoride Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP \mathbb{R} and \mathbb{R} and \mathbb{R}

No outliers found. Tukey's method selected by user.

 $n = 8$

Ladder of Powers transformations did not improve normality; analysis run on raw data.

High cutoff = 1.98, low cutoff = -0.085, based on IQR multiplier of 3.

Constituent: Fluoride Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

n = 8

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.2434 , low cutoff = 0.05132 , based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Fluoride Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Fluoride Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Tukey's method selected by user.

formed to achieve best W statistic (graph shown in original units).

High cutoff = 0.2919 . low cutoff = 0.1442, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Lead Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Lead Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$ No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.002274 . $log₁$ cutoff = 0.000005738 , based on IQR multiplier \overline{of} 3.

Constituent: Lead Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Lead Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Lead Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Ω 0.0001 0.0002 0.0003 0.0004 0.0005 7/26/18 9/5/18 10/16/18 11/27/18 1/7/19 2/18/19 Tukey's Outlier Screening FAP-MW-7 Constituent: Lead Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP $\frac{1}{\sqrt{2}}$ and $n = 8$ No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units). High cutoff = 0.005995, low cutoff = 0.000006008, based on IQR multiplier of 3. Ω 0.0006 0.0012 0.0018 0.0024 0.003 7/26/18 9/5/18 10/17/18 11/28/18 1/9/19 2/20/19 Tukey's Outlier Screening FAP-MW-8 Constituent: Lead Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP $\frac{1}{2}$ and $\left(\begin{array}{ccc} 1 & 1 & 1 & 1 \ 1 & 1 & 1 & 1 \end{array} \right)$

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Lead Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

No outliers found. Tukey's method selected by user.

 $n = 8$

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.01304, low cutoff = 0.00002373, based on IQR multiplier $of 3.$

No outliers found. Tukey's method selected by user. Ladder of Powers trans-

formations did not improve normality; analysis run on raw data.

High cutoff = 0.096 , low cutoff = -0.0335, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Tukey's Outlier Screening Tukey's Outlier Screening FAP-MW-1810A (bg) FAP-MW-1807A (bg) 0.03 0.03 $n = 8$ No outliers found. Tukey's method selected by user. 0.024 0.024 Data were cube root transformed to achieve best W statistic (graph shown in original units). ð High cutoff = 0.06462, low cutoff = 0.002995, 0.018 0.018 based on IQR multiplier of 3. $\frac{1}{\sqrt{2}}$ and $\frac{1}{2}$ a 0.012 0.012 0.006 0.006 Ω Ω 7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/22/19 7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/21/19 Constituent: Lithium Analysis Run 4/18/2019 4:55 AM View: Descriptive Constituent: Lithium Analysis Run 4/18/2019 4:55 AM View: Descriptive

No outliers found. Tukey's method selected by user.

 $n = 8$

Ladder of Powers transformations did not improve normality; analysis run on raw data.

High cutoff = 0.058, low cutoff = -0.019, based on IQR multiplier of 3.

Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Lithium Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Amos FAP Client: Geosyntec Data: Amos FAP

 $n = 8$ No outliers found. Tukey's method select-

Ladder of Powers transformations did not improve normality; analy-

High cutoff = 0.042 , low $cutoff = 0.0035, based$ on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

No outliers found. Tukey's method selected by user.

 $n = 8$

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 1.111, low cutoff = 0.000243, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Lithium Analysis Run 4/18/2019 4:55 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were square root transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.09918 , low cutoff = -0.002793, based on IQR multiplier of 3.

Tukey's Outlier Screening Tukey's Outlier Screening FAP-MW-2 FAP-MW-1 0.03 0.03 $n = 8$ No outliers found. Tukey's method selected by user. 0.024 Ladder of Powers trans-0.024 formations did not improve normality; analysis run on raw data. High cutoff = 0.0475 . 0.018 0.018 low cutoff = -0.0015, based on IQR multiplier of 3. $\frac{1}{\sqrt{2}}$, $\frac{1}{\sqrt{2}}$ $\frac{1}{\sqrt{2}}$ and $\frac{1}{\sqrt{2}}$ and 0.012 0.012 у. 0.006 0.006 Ω Ω 7/27/18 9/7/18 10/19/18 11/30/18 1/11/19 2/22/19 7/24/18 9/4/18 10/16/18 11/27/18 1/8/19 2/19/19 Constituent: Lithium Analysis Run 4/18/2019 4:56 AM View: Descriptive Constituent: Lithium Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP Amos FAP Client: Geosyntec Data: Amos FAP

 $n = 8$ No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.6162 . low cutoff = 0.0005333, based on IQR multiplier of 3.

Constituent: Lithium Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Mercury Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

No outliers found. Tukey's method selected by user. Data were cube root trans-

formed to achieve best W statistic (graph shown in original units).

The results were invalidated, because the lower and upper quartiles are

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Mercury Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Mercury Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$ No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

> High cutoff = 0.00008764, low cutoff = 6.8e-7, based on IQR multiplier of 3.

Constituent: Mercury Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Mercury Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Ω 0.22 0.44 0.66 0.88 1.1 7/24/18 9/4/18 10/16/18 11/27/18 1/8/19 2/19/19 Tukey's Outlier Screening FAP-MW-6 Constituent: Mercury Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP $\frac{1}{\sqrt{2}}$, $\frac{1}{\sqrt{2}}$ $n = 8$ No outliers found. Tukey's method selected by user. Data were cube root transformed to achieve best W statistic (graph shown in original units). The results were invalidated, because the lower and upper quartiles are equal. Ω 0.0016 0.0032 0.0048 0.0064 0.008 7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/22/19 Tukey's Outlier Screening FAP-MW-1809A (bg) Constituent: Molybdenum Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP $\frac{1}{\sqrt{2}}$ and $n = 8$ ed by user. of 3.

No outliers found. Tukey's method select-

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.009394, low cutoff = 0.0006269 , based on IQR multiplier

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Molybdenum Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

7/25/18 9/5/18 10/17/18 11/28/18 1/9/19 2/21/19 Tukey's Outlier Screening FAP-MW-1808A (bg) Constituent: Molybdenum Analysis Run 4/18/2019 4:56 AM View: Descriptive $\frac{1}{2}$ and $\frac{1}{2}$ a $n = 8$ No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units). High cutoff = 0.3068, low cutoff = 0.00002502, based on IQR multiplier of 3. Ω 0.006 0.012 0.018 0.024 0.03 7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/21/19 Tukey's Outlier Screening FAP-MW-1807B (bg) Constituent: Molybdenum Analysis Run 4/18/2019 4:56 AM View: Descriptive $\frac{1}{2}$ $\left| \begin{array}{ccc} \end{array} \right|$ $\left| \begin{array}{ccc} \end{array} \right|$

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.2485 . low cutoff = 0.0002539, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 Ω

0.004

0.008

0.012

0.016

0.02

Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Molybdenum Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.0247 , low cutoff = 0.0003816 . based on IQR multiplier of 3.

Constituent: Molybdenum Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Molybdenum Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.00219, low cutoff = 0.0005554 based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Molybdenum Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

No outliers found. Tukey's method selected by user.

Data were cube root transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.0008482 . low cutoff = 0.0004351, based on IQR multiplier

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: pH Analysis Run 4/18/2019 4:56 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

 $n = 8$ No outliers found. Tukey's method selected by user.

 $n = 8$ No outliers found. Tukey's method selected by user.

Data were cube transform-ed to achieve best W statistic (graph shown in original units). High cutoff = 8.122, low cutoff = 6.479, based on IQR multiplier of 3.

Data were x^6 transformed to achieve best W statistic (graph shown in original units).

High cutoff = 8.326 , low cutoff = 5.223, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: pH Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

 $n = 8$ No outliers found. Tukey's method selected by user.

Data were x^4 transformed to achieve best W statistic (graph shown in original units).

High cutoff = 9.014 , low cutoff = 4.936, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: pH Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Data were x^6 transformed to achieve best W statistic (graph shown in original units).

High cutoff = 8.987, low cutoff = 7.782, based on IQR multiplier of 3.

No outliers found. Tukey's method selected by user.

Data were x^6 transformed to achieve best W statistic (graph shown in original units).

High cutoff = 8.482 , low cutoff = 7.548, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Ω 1.8 3.6 5.4 7.2 9 7/26/18 9/5/18 10/16/18 11/27/18 1/7/19 2/18/19 Tukey's Outlier Screening FAP-MW-7 Constituent: pH Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP 궁, Andrea Hotel Hotel
2012 - English Hotel Hote $n = 8$ No outliers found. Tukey's method selected by user. Data were cube transformed to achieve best W statistic (graph shown in original units). High cutoff = 9.58, low cutoff = 7.427, based on IQR multiplier of 3. Ω \mathfrak{p} 4 6 8 10 8/2/18 9/11/18 10/21/18 11/30/18 1/9/19 2/19/19 Tukey's Outlier Screening FAP-MW-8 Constituent: pH Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP 궁, Andrea Hotel Hotel
2012 - Editor Hotel $n = 8$

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: pH Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Selenium Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

No outliers found. Tukey's method selected by user. Data were natural log

transformed to achieve best W statistic (graph shown in original units).

High cutoff = 10.58, low cutoff = 6.649, based on IQR multiplier of 3.

No outliers found. Tukey's method select-

High cutoff = 11.18, low cutoff = 4.0e-9, based

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

No outliers found. Tukey's method selected by user.

 $n = 8$

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.002864, low cutoff = 0.00001481, based on IQR multiplier $of 3.$

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Selenium Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Selenium Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Selenium Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Selenium Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Selenium Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Tukey's Outlier Screening

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Sulfate Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Sulfate Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

n = 8

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 52.25, low cutoff = 4.215, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Ω 12 24 36 48 60 7/24/18 9/4/18 10/16/18 11/27/18 1/8/19 2/20/19 Tukey's Outlier Screening FAP-MW-1801A Constituent: Sulfate Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP $\frac{1}{\sqrt{2}}$, $\frac{1}{\sqrt{2}}$ $n = 8$ No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units). High cutoff = 71.51 , low cutoff = 30.1, based on IQR multiplier of 3. Ω 10 20 30 40 50 8/1/18 9/10/18 10/21/18 12/1/18 1/11/19 2/21/19 Tukey's Outlier Screening FAP-MW-1804A Constituent: Sulfate Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP $\frac{1}{\sqrt{2}}$, and the contract of $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$, and $\frac{1}{\sqrt{2}}$

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Sulfate Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$

 $n = 8$ No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units). High cutoff = 78.29, low cutoff = 18.65, based on IQR multiplier of 3.

No outliers found. Tukey's method selected by user.

Data were square root transformed to achieve best W statistic (graph shown in original units).

High cutoff = 79.64, low cutoff = -9.759, based on IQR multiplier of 3.

Ω 12 24 36 48 60 7/24/18 9/4/18 10/16/18 11/27/18 1/8/19 2/19/19 Tukey's Outlier Screening FAP-MW-1 $\frac{1}{2}$ and $\frac{1}{2}$ a $n = 8$ Outlier is drawn as solid. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units). High cutoff = 35.61, low cutoff = 27.55, based on IQR multiplier of 3.

Constituent: Sulfate Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Sulfate Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Sulfate Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Data were natural log transformed to achieve best W statistic (graph shown in original units).

 $n = 8$ No outliers found. Tukey's method selected by user.

High cutoff = 2, low cutoff = 2.0e-7, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Thallium Analysis Run 4/18/2019 4:57 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Ω 0.00012 0.00024 0.00036 0.00048 0.0006 7/25/18 9/5/18 10/17/18 11/28/18 1/9/19 2/21/19 Tukey's Outlier Screening FAP-MW-1808A (bg) Constituent: Thallium Analysis Run 4/18/2019 4:58 AM View: Descriptive $\frac{1}{\sqrt{2}}$ and $n = 8$ No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units). High cutoff = 0.007393, low cutoff = 0.00001378, based on IQR multiplier of 3.

Amos FAP Client: Geosyntec Data: Amos FAP

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.03402, low cutoff = 0.0000018, based on IQR multiplier of 3.

Constituent: Thallium Analysis Run 4/18/2019 4:58 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Thallium Analysis Run 4/18/2019 4:58 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 8$

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.03402, low cutoff = 0.0000018, based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Thallium Analysis Run 4/18/2019 4:58 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

n = 8

No outliers found. Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.03402, low cutoff = 0.0000018 based on IQR multiplier of 3.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Thallium Analysis Run 4/18/2019 4:58 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

n = 8 No outliers found.

 $n = 8$ No outliers found. Tukey's method selected by user. Data were natural log transformed to achieve best W statistic (graph shown in original units). High cutoff = 0.0625, low cutoff = 8.0e-7, based on IQR multiplier of 3.

Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 0.03402, low cutoff = 0.0000018 based on IQR multiplier of 3.

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 4:58 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 4:58 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Data were x^6 transformed to achieve best W statistic (graph shown in original units).

 $n = 5$ No outliers found. Tukey's method selected by user.

High cutoff = 640, low cutoff = -534.8, based on IQR multiplier of 3.

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 4:58 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 $n = 5$ No outliers found.

Tukey's method selected by user.

Data were natural log transformed to achieve best W statistic (graph shown in original units).

High cutoff = 622.3, low cutoff = 335.6, based on IQR multiplier of 3.

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 4:58 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 4:58 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 4:58 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 4:58 AM View: Descriptive Amos FAP Client: Geosyntec Data: Amos FAP

FIGURE D: TREND TESTS
Trend Test Summary Table - Significant Results

Amos FAP Client: Geosyntec Data: Amos FAP Printed 4/18/2019, 8:53 AM

Trend Test Summary Table - All Results

Amos FAP Client: Geosyntec Data: Amos FAP Printed 4/18/2019, 8:53 AM

Trend Test Summary Table - All Results

Amos FAP Client: Geosyntec Data: Amos FAP Printed 4/18/2019, 8:53 AM

Constituent: Boron Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Boron Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Boron Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Boron Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Boron Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Boron Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Boron Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Boron Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Boron Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Boron Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Boron Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Boron Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Calcium Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Calcium Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Calcium Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Calcium Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Chloride Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Chloride Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Chloride Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Chloride Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Chloride Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Chloride Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Chloride Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Chloride Analysis Run 4/18/2019 8:46 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Chloride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Chloride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Chloride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Fluoride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Fluoride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Fluoride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Fluoride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Fluoride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Fluoride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Fluoride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Fluoride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Fluoride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Fluoride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Fluoride Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: pH Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: pH Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: pH Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: pH Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: pH Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: pH Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: pH Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: pH Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: pH Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: pH Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Sulfate Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Sulfate Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Sulfate Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Sulfate Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Sulfate Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Sulfate Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Sulfate Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Sulfate Analysis Run 4/18/2019 8:47 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Sulfate Analysis Run 4/18/2019 8:48 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Sulfate Analysis Run 4/18/2019 8:48 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Sulfate Analysis Run 4/18/2019 8:48 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 8:48 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 8:48 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 8:48 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 8:48 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 8:48 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 8:48 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 8:48 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 8:48 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 8:48 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 8:48 AM View: Trend Testing Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. EPA

FIGURE E: ANOVA

Analysis of Variance

Constituent: Boron Analysis Run 6/4/2019 8:03 PM Amos FAP Client: Geosyntec Data: Amos FAP

For observations made between 7/25/2018 and 2/22/2019 the parametric analysis of variance test indicates VARIATION at the 5% significance level. Because the calculated F statistic is greater than the tabulated F statistic, the hypothesis of a single homogeneous population is rejected.

Calculated F statistic = 25.55

Tabulated F statistic = 2.65 with 4 and 35 degrees of freedom at the 5% significance level.

ONE-WAY PARAMETRIC ANOVA TABLE

The Shapiro Wilk normality test on the residuals passed on the raw data. Alpha = 0.01, calculated = 0.9729, critical = 0.919. Levene's Equality of Variance test passed. Calculated = 1.436, tabulated = 2.65.

Constituent: Calcium Analysis Run 6/4/2019 8:04 PM Amos FAP Client: Geosyntec Data: Amos FAP

For observations made between 7/25/2018 and 2/22/2019 the parametric analysis of variance test (after square root transformation) indicates VARIATION at the 5% significance level. Because the calculated F statistic is greater than the tabulated F statistic, the hypothesis of a single homogeneous population is rejected.

Calculated F statistic = 2274

Tabulated F statistic = 2.65 with 4 and 35 degrees of freedom at the 5% significance level.

ONE-WAY PARAMETRIC ANOVA TABLE

The Shapiro Wilk normality test on the residuals passed after square root transformation. Alpha = 0.01, calculated = 0.9792, critical = 0.919. Levene's Equality of Variance test passed. Calculated = 1.522, tabulated = 2.65.

Constituent: Chloride Analysis Run 6/4/2019 8:04 PM Amos FAP Client: Geosyntec Data: Amos FAP

For observations made between 7/25/2018 and 2/22/2019 the parametric analysis of variance test indicates VARIATION at the 5% significance level. Because the calculated F statistic is greater than the tabulated F statistic, the hypothesis of a single homogeneous population is rejected.

Calculated F statistic = 158.5

Tabulated F statistic = 2.65 with 4 and 35 degrees of freedom at the 5% significance level.

ONE-WAY PARAMETRIC ANOVA TABLE

The Shapiro Wilk normality test on the residuals passed on the raw data. Alpha = 0.01, calculated = 0.9779, critical = 0.919. Levene's Equality of Variance test passed. Calculated = 1.912, tabulated = 2.65.

Non-Parametric ANOVA

Constituent: Fluoride Analysis Run 6/4/2019 8:05 PM Amos FAP Client: Geosyntec Data: Amos FAP

For observations made between 7/25/2018 and 2/22/2019, the non-parametric analysis of variance test indicates a DIFFERENCE between the medians of the groups tested at the 5% significance level. Because the calculated Kruskal-Wallis statistic is greater than the Chi-squared value, we conclude that at least one group has a significantly different median concentration of this constituent when compared to another group.

Calculated Kruskal-Wallis statistic = 34.59

Tabulated Chi-Squared value = 9.488 with 4 degrees of freedom at the 5% significance level.

There were 7 groups of ties in the data, consequently the Kruskal-Wallis statistic (H) was adjusted. The adjusted statistic (H') was utilized to determine if the medians were equal. Kruskal-Wallis statistic (H) = 34.49 Adjusted Kruskal-Wallis statistic (H') = 34.59

Constituent: pH Analysis Run 6/4/2019 8:05 PM Amos FAP Client: Geosyntec Data: Amos FAP

For observations made between 7/25/2018 and 2/21/2019 the parametric analysis of variance test (after x^5 transformation) indicates VARIATION at the 5% significance level. Because the calculated F statistic is greater than the tabulated F statistic, the hypothesis of a single homogeneous population is rejected.

Calculated F statistic = 7.243

Tabulated F statistic = 2.65 with 4 and 35 degrees of freedom at the 5% significance level.

ONE-WAY PARAMETRIC ANOVA TABLE

The Shapiro Wilk normality test on the residuals passed after x^5 transformation. Alpha = 0.01, calculated = 0.935, critical = 0.919. Levene's Equality of Variance test passed. Calculated = 1.252, tabulated = 2.65.
Non-Parametric ANOVA

Constituent: Sulfate Analysis Run 6/4/2019 8:05 PM Amos FAP Client: Geosyntec Data: Amos FAP

For observations made between 7/25/2018 and 2/22/2019, the non-parametric analysis of variance test indicates a DIFFERENCE between the medians of the groups tested at the 5% significance level. Because the calculated Kruskal-Wallis statistic is greater than the Chi-squared value, we conclude that at least one group has a significantly different median concentration of this constituent when compared to another group.

Calculated Kruskal-Wallis statistic = 34.55

Tabulated Chi-Squared value = 9.488 with 4 degrees of freedom at the 5% significance level.

There were 8 groups of ties in the data, consequently the Kruskal-Wallis statistic (H) was adjusted. The adjusted statistic (H') was utilized to determine if the medians were equal. Kruskal-Wallis statistic (H) = 34.52 Adjusted Kruskal-Wallis statistic (H') = 34.55

Parametric ANOVA

Constituent: Total Dissolved Solids Analysis Run 6/4/2019 8:06 PM Amos FAP Client: Geosyntec Data: Amos FAP

For observations made between 7/25/2018 and 11/14/2018 the parametric analysis of variance test indicates VARIATION at the 5% significance level. Because the calculated F statistic is greater than the tabulated F statistic, the hypothesis of a single homogeneous population is rejected.

Calculated F statistic = 99.95

Tabulated F statistic = 2.87 with 4 and 20 degrees of freedom at the 5% significance level.

ONE-WAY PARAMETRIC ANOVA TABLE

The Shapiro Wilk normality test on the residuals passed on the raw data. Alpha = 0.01, calculated = 0.9046, critical = 0.888. Levene's Equality of Variance test passed. Calculated = 1.562, tabulated = 2.87.

FIGURE F: UPPER TOLERANCE LIMITS – APPENDIX III

UTL's - Appendix III

Amos FAP Client: Geosyntec Data: Amos FAP Printed 4/18/2019, 9:02 AM

FIGURE G: CONFIDENCE INTERVALS – APPENDIX III

Confidence Interval Summary Table - Significant Results

Amos FAP Client: Geosyntec Data: Amos FAP Printed 4/18/2019, 9:10 AM

Confidence Interval Summary Table - All Results

Amos FAP Client: Geosyntec Data: Amos FAP Printed 4/18/2019, 9:10 AM

Confidence Interval Summary Table - All Results

Amos FAP Client: Geosyntec Data: Amos FAP Printed 4/18/2019, 9:10 AM

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric Confidence Interval Compliance limit is exceeded.* Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

Parametric and Non-Parametric (NP) Confidence Interval

Constituent: Boron Analysis Run 4/18/2019 9:07 AM View: Confidence Intervals - Appendix III Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 9:07 AM View: Confidence Intervals - Appendix III Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Constituent: Chloride Analysis Run 4/18/2019 9:07 AM View: Confidence Intervals - Appendix III Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric and Non-Parametric (NP) Confidence Interval

Compliance limit is exceeded.* Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric Confidence Interval

Parametric and Non-Parametric (NP) Confidence Interval

Compliance Limit is not exceeded. Per-well alpha = 0.01 except as noted. Normality Test: Shapiro Wilk, alpha based on n.

Constituent: pH Analysis Run 4/18/2019 9:07 AM View: Confidence Intervals - Appendix III Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Sulfate Analysis Run 4/18/2019 9:07 AM View: Confidence Intervals - Appendix III Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Parametric Confidence Interval

Compliance limit is exceeded.* Per-well alpha = 0.01. Normality Test: Shapiro Wilk, alpha based on n.

FIGURE H: INTRAWELL PREDICTION LIMITS

Intrawell Prediction Limit Summary

Amos FAP Client: Geosyntec Data: Amos FAP Printed 4/18/2019, 9:22 AM

Intrawell Prediction Limit Summary

Intrawell Prediction Limit Summary

Amos FAP Client: Geosyntec Data: Amos FAP Printed 4/18/2019, 9:22 AM

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 Ω

0.08 0.16

0.24 0.32

0.4

Prediction Limit

FAP-MW-1810A background

 \blacksquare

 $Limit = 0.3585$

Prediction Limit

Background Data Summary: Mean=0.08625, Std. Dev.=0.01507, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9173, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Boron Analysis Run 4/18/2019 9:15 AM View: PL's - Intrawell

Background Data Summary: Mean=0.2449, Std. Dev.=0.03627, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8739, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/22/19

 $\frac{1}{2}$ and $\frac{1}{2}$ a

Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1807A (bg)

Background Data Summary: Mean=0.1601, Std. Dev.=0.04237, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9265, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-1808A (bg)

Background Data Summary: Mean=0.1476, Std. Dev.=0.02746, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.954, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-9

Prediction Limit

Background Data Summary: Mean=0.1963, Std. Dev.=0.03653, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8158, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Background Data Summary: Mean=0.1391, Std. Dev.=0.01684, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9755, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Boron Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Boron Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1801A

Background Data Summary: Mean=0.1984, Std. Dev.=0.08327, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8746, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1804A

Background Data Summary: Mean=0.7071, Std. Dev.=0.08232, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9053, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-2

Prediction Limit

Background Data Summary: Mean=0.1638, Std. Dev.=0.02273, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.841, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523 . Assumes 1 future value.

Background Data Summary: Mean=0.2668, Std. Dev.=0.03688, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8584, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Boron Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Boron Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1

Background Data Summary: Mean=0.1503, Std. Dev.=0.03518, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8744, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-5

Background Data Summary: Mean=0.258, Std. Dev.=0.03107, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8957, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Prediction Limit

Intrawell Parametric, FAP-MW-8

Prediction Limit

Background Data Summary: Mean=0.1155, Std. Dev.=0.04212, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9538, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

> Constituent: Boron Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Background Data Summary: Mean=0.2351, Std. Dev.=0.02698, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9745, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

> Constituent: Boron Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-6

Background Data Summary: Mean=0.099, Std. Dev.=0.0191, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9721, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-1809A (bg)

Background Data Summary: Mean=183.3, Std. Dev.=5.8, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9648, critical = 0.749. Kappa = 3.133 $(c=7, w=10, 1$ of 2, event alpha = 0.05132). Report alpha = 0.0007523 . Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-1807A (bg)

Prediction Limit

Background Data Summary: Mean=27.25, Std. Dev.=3.41, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9358, critical = 0.749. Kappa = 3.133 $(c=7, w=10, 1$ of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Background Data Summary: Mean=150.5, Std. Dev.=8.976, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9856, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Calcium Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1808A (bg)

Background Data Summary (based on square root transformation): Mean=6.383, Std. Dev.=0.2174, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.7501, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1807B (bg)

Background Data Summary: Mean=9.51, Std. Dev.=1.152, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8132, critical = 0.749. Kappa = 3.133 $(c=7, w=10, 1$ of 2, event alpha = 0.05132). Report alpha = 0.0007523 . Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Prediction Limit

Background Data Summary: Mean=1.14, Std. Dev.=0.156, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.809, critical = 0.749. Kappa = 3.133 $(c=7, w=10, 1$ of 2, event alpha = 0.05132). Report alpha = 0.0007523 . Assumes 1 future value.

Background Data Summary: Mean=60.69, Std. Dev.=4.698, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.7915, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Calcium Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1804A

Background Data Summary: Mean=16.78, Std. Dev.=10.99, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8072, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1806A

Background Data Summary: Mean=8.583, Std. Dev.=3.249, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8329, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-1

Prediction Limit

Background Data Summary: Mean=3.998, Std. Dev.=0.2101, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9649, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Background Data Summary: Mean=2.666, Std. Dev.=0.29, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8844, critical = 0.749. Kappa = 3.133 $(c=7, w=10, 1$ of 2, event alpha = 0.05132). Report alpha = 0.0007523 . Assumes 1 future value.

Constituent: Calcium Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-5

Background Data Summary: Mean=6.703, Std. Dev.=0.3478, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8777, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-7

Background Data Summary: Mean=1.371, Std. Dev.=0.08167, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9845, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-6

Prediction Limit

Background Data Summary: Mean=2.353, Std. Dev.=0.227, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9872, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Background Data Summary: Mean=59.19, Std. Dev.=3.638, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9339, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Calcium Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Calcium Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1809A (bg)

Background Data Summary: Mean=27.84, Std. Dev.=1.338, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9651, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1810A (bg)

Background Data Summary: Mean=18.85, Std. Dev.=2.689, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9619, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

 Ω 3 6

9 12

15

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-1808A (bg)

Background Data Summary: Mean=18.56, Std. Dev.=1.606, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9357, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Chloride Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Prediction Limit Intrawell Parametric, FAP-MW-1807A (bg)

 \blacksquare

FAP-MW-1807A background

 \blacksquare

Limit = 14.41

7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/21/19

цf,

Background Data Summary: Mean=10.96, Std. Dev.=1.101, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9322, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

mark and the second second
The second s

Constituent: Chloride Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1807B (bg)

Background Data Summary: Mean=9.093, Std. Dev.=1.103, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9389, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-9

Background Data Summary: Mean=7.355, Std. Dev.=0.2072, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9073, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-1804A

Prediction Limit

Background Data Summary: Mean=9.143, Std. Dev.=1.022, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9798, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Background Data Summary: Mean=4.228, Std. Dev.=0.8638, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9132, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Chloride Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Chloride Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1806A

Background Data Summary: Mean=10.14, Std. Dev.=4.628, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8778, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-2

Background Data Summary: Mean=446.8, Std. Dev.=15.24, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8537, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-5

Prediction Limit

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 8 background values. Well-constituent pair annual alpha = 0.04242. Individual comparison alpha = 0.02144 (1 of 2). Assumes 1 future value. Insufficient data to test for seasonality: data were not deseasonalized.

> Constituent: Chloride Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Background Data Summary: Mean=793.8, Std. Dev.=18.97, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8464, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

> Constituent: Chloride Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-7

Background Data Summary: Mean=5.355, Std. Dev.=0.143, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9132, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-8

Background Data Summary: Mean=109.8, Std. Dev.=3.196, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9371, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Background Data Summary: Mean=18.58, Std. Dev.=0.913, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9387, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Prediction Limit

Background Data Summary: Mean=0.15, Std. Dev.=0.01195, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.814, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Chloride Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Fluoride Analysis Run 4/18/2019 9:16 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1810A (bg)

Background Data Summary: Mean=0.9425, Std. Dev.=0.06228, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9529, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1807A (bg)

Background Data Summary: Mean=0.1838, Std. Dev.=0.02925, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.833, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Prediction Limit

Background Data Summary: Mean=0.4788, Std. Dev.=0.06896, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8863, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Background Data Summary: Mean=0.9525, Std. Dev.=0.1599, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9161, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Fluoride Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Fluoride Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-9

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Background Data Summary: Mean=0.1125, Std. Dev.=0.01581, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8142, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Background Data Summary: Mean=0.8488, Std. Dev.=0.04051, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9368, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-1806A

Prediction Limit

Background Data Summary: Mean=0.7775, Std. Dev.=0.1019, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9605, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Background Data Summary: Mean=0.7225, Std. Dev.=0.1321, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8038, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Fluoride Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Fluoride Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-2

Background Data Summary (based on natural log transformation): Mean=1.12, Std. Dev.=0.03235, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.752, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-1

Background Data Summary: Mean=0.4275, Std. Dev.=0.01832, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9385, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-7

Prediction Limit

Background Data Summary: Mean=3.403, Std. Dev.=0.1025, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.7895, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Background Data Summary: Mean=0.2675, Std. Dev.=0.01165, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8923, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Fluoride Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Fluoride Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-8

Background Data Summary: Mean=2.735, Std. Dev.=0.1209, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9633, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-6

Background Data Summary: Mean=0.2288, Std. Dev.=0.01126, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8815, critical = 0.749. Kappa $= 3.133$ (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

 Ω

test for seasonality: data were not deseasonalized.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-1810A (bg)

Background Data Summary: Mean=7.39, Std. Dev.=0.1929, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9848, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

> Constituent: pH Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1807A (bg)

Background Data Summary: Mean=7.181, Std. Dev.=0.4982, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8567, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Background Data Summary (based on x^4 transformation): Mean=2978, Std. Dev.=697.1, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.7714, critical = 0.749 . Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523 . Assumes 1 future value.

Constituent: pH Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: pH Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limits are highest and lowest of 8 background values. Well-constituent pair annual alpha = 0.08484 . Individual comparison alpha = 0.04288 (1 of 2). Assumes 1 future value. Insufficient data to

7/26/18 9/5/18 10/17/18 11/28/18 1/9/19 2/20/19

 Ω $\overline{2}$ 4 6

8

10

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-9

Background Data Summary: Mean=8.724, Std. Dev.=0.8413, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8788, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: pH Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1801A

Constituent: pH Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Background Data Summary: Mean=7.968, Std. Dev.=0.4824, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8032, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

7/26/18 9/6/18 10/18/18 11/29/18 1/10/19 2/21/19

 $\overline{\omega}$, and the contract of the contract o

Prediction Limit Intrawell Parametric, FAP-MW-1807B (bg)

> FAP-MW-1807B background

п

Limit = 9.479

 $Limit = 6.456$

Background Data Summary: Mean=7.345, Std. Dev.=0.4707, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8333, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Background Data Summary: Mean=7.79, Std. Dev.=0.3147, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9398, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-2

Background Data Summary: Mean=8.219, Std. Dev.=0.3396, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8795, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Background Data Summary: Mean=8.485, Std. Dev.=0.1476, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9597, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: pH Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: pH Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1

Limit = 8.774

Limit = 7.736

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-5

Background Data Summary: Mean=8.081, Std. Dev.=0.08839, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9328, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: pH Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-8

Background Data Summary: Mean=8.654, Std. Dev.=0.203, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9703, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Background Data Summary: Mean=8.405, Std. Dev.=0.4332, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9319, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

> Constituent: pH Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-6

Background Data Summary: Mean=6.805, Std. Dev.=0.1462, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9346, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-1809A (bg)

Background Data Summary: Mean=391.3, Std. Dev.=7.536, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.787, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

0 60 120

180 240

300

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Background Data Summary: Mean=345.4, Std. Dev.=29.79, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9556, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Sulfate Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1808A (bg)

Constituent: Sulfate Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Background Data Summary: Mean=138.5, Std. Dev.=30.15, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8758, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

8/2/18 9/11/18 10/22/18 12/2/18 1/12/19 2/22/19

 $\frac{1}{\sqrt{2}}$ and $\frac{1}{\sqrt{2}}$ and

Prediction Limit Intrawell Parametric, FAP-MW-1810A (bg)

> FAP-MW-1810A background

 \blacksquare

 $Limit = 233$

Background Data Summary: Mean=206.1, Std. Dev.=36.67, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8267, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1807B (bg)

Background Data Summary: Mean=225.1, Std. Dev.=7.259, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8681, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Prediction Limit

Intrawell Parametric, FAP-MW-1801A

Prediction Limit

Background Data Summary (based on square root transformation): Mean=3.931, Std. Dev.=0.6651, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.7553, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

> Constituent: Sulfate Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Background Data Summary: Mean=46.73, Std. Dev.=4.631, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9664, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

> Constituent: Sulfate Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1804A

Background Data Summary: Mean=38.09, Std. Dev.=5.039, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9021, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1806A

Background Data Summary: Mean=40.39, Std. Dev.=6.689, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9277, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Sulfate Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Prediction Limit

Intrawell Non-parametric, FAP-MW-1

Prediction Limit

Background Data Summary: Mean=8.825, Std. Dev.=5.716, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.901, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 8 background values. Well-constituent pair annual alpha = 0.04242. Individual comparison alpha = 0.02144 (1 of 2). Assumes 1 future value. Insufficient data to test for seasonality: data were not deseasonalized.

Constituent: Sulfate Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Sulfate Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG Hollow symbols indicate censored values.

Prediction Limit Intrawell Non-parametric, FAP-MW-5

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-7

Background Data Summary: Mean=32.04, Std. Dev.=0.5097, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.779, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Non-parametric test used in lieu of parametric prediction limit because the Shapiro Wilk normality test showed the data to be non-normal at the 0.01 alpha level. Limit is highest of 8 background values. 50% NDs. Well-constituent pair annual alpha = 0.04242 . Individual comparison alpha = 0.02144 (1 of 2). Assumes 1 future value. Insufficient data to test for seasonality: data were not deseasonalized.
Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-6

Prediction Limit

Background Data Summary: Mean=26.73, Std. Dev.=3.126, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9532, critical = 0.749. Kappa = 3.133 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Background Data Summary: Mean=42.8, Std. Dev.=1.659, n=8. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8878, critical = 0.749. Kappa = 3.133 $(c=7, w=10, 1$ of 2, event alpha = 0.05132). Report alpha = 0.0007523 . Assumes 1 future value.

Constituent: Sulfate Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Sulfate Analysis Run 4/18/2019 9:17 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1809A (bg)

Background Data Summary: Mean=1042, Std. Dev.=21.68, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8711, critical = 0.686. Kappa = 5.311 $(c=7, w=10, 1$ of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1810A (bg)

Background Data Summary: Mean=529.8, Std. Dev.=34.78, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8928, critical = 0.686. Kappa = 5.311 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

 Ω 220 440

660 880

1100

Prediction Limit

FAP-MW-1808A background

 \blacksquare

 $Limit = 1093$

Background Data Summary: Mean=921.8, Std. Dev.=55.59, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9705, critical = 0.686. Kappa = 5.311 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Prediction Limit

Background Data Summary: Mean=729.6, Std. Dev.=68.5, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8412, critical = 0.686. Kappa = 5.311 $(c=7, w=10, 1$ of 2, event alpha = 0.05132). Report alpha = 0.0007523 . Assumes 1 future value.

7/25/18 8/16/18 9/7/18 9/29/18 10/21/18 11/13/18

 $\frac{1}{\sqrt{2}}$ and $\frac{1}{\sqrt{2}}$ below the contract of $\frac{1}{\sqrt{2}}$ and $\frac{1}{\sqrt{2}}$ and

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 9:18 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 9:18 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1807B (bg)

Background Data Summary: Mean=731.4, Std. Dev.=16.46, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9042, critical = 0.686. Kappa = 5.311 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-9

Background Data Summary: Mean=462.2, Std. Dev.=33.51, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.962, critical = 0.686. Kappa = 5.311 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Prediction Limit

Background Data Summary: Mean=378.2, Std. Dev.=26.4, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8797, critical = 0.686. Kappa = 5.311 $(c=7, w=10, 1$ of 2, event alpha = 0.05132). Report alpha = 0.0007523 . Assumes 1 future value.

Background Data Summary: Mean=456.6, Std. Dev.=26.87, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9112, critical = 0.686. Kappa = 5.311 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 9:18 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 9:18 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-1806A

Background Data Summary: Mean=434.2, Std. Dev.=9.628, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9212, critical = 0.686. Kappa = 5.311 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-2

Background Data Summary: Mean=1270, Std. Dev.=25.5, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8538, critical = 0.686. Kappa = 5.311 $(c=7, w=10, 1$ of 2, event alpha = 0.05132). Report alpha = 0.0007523 . Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Prediction Limit

Background Data Summary: Mean=448.6, Std. Dev.=16.47, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.8986, critical = 0.686. Kappa = 5.311 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Background Data Summary: Mean=1870, Std. Dev.=20, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9052, critical = 0.686. Kappa = 5.311 $(c=7, w=10, 1$ of 2, event alpha = 0.05132). Report alpha = 0.0007523 . Assumes 1 future value.

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 9:18 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 9:18 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit Intrawell Parametric, FAP-MW-7

Background Data Summary: Mean=370.8, Std. Dev.=16.45, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9009, critical = 0.686. Kappa = 5.311 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Prediction Limit

Intrawell Parametric, FAP-MW-8

Background Data Summary: Mean=714.8, Std. Dev.=15.69, n=5. Insufficient data to test for seasonality: data were not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9005, critical = 0.686. Kappa = 5.311 (c=7, w=10, 1 of 2, event alpha = 0.05132). Report alpha = 0.0007523. Assumes 1 future value.

Sanitas™ v.9.6.12h Sanitas software utilized by Groundwater Stats Consulting. UG

Background Data Summary: Mean=396.4, Std. Dev.=5.177, n=5. Insufficient data to test for seasonality: data were
not deseasonalized. Normality test: Shapiro Wilk @alpha = 0.01, calculated = 0.9153, critical = 0.686.

Constituent: Total Dissolved Solids Analysis Run 4/18/2019 9:18 AM View: PL's - Intrawell Amos FAP Client: Geosyntec Data: Amos FAP

Power Curve

This report reflects annual total based on two evaluations per year.

Analysis Run 4/18/2019 9:13 AM View: Confidence Intervals - Appendix III Amos FAP Client: Geosyntec Data: Amos FAP

Power Curve

 Kappa = 2.21, based on 10 compliance wells and 7 constituents, evaluated semi-annually (this report reflects annual total).

Analysis Run 4/18/2019 9:12 AM View: Confidence Intervals - Appendix III Amos FAP Client: Geosyntec Data: Amos FAP

941 Chatham Lane, Suite 103 Columbus, Ohio 43212 PH 614.468.0415 FAX 614.468.0416 www.geosyntec.com

Memorandum

In accordance with the United States Environmental Protection Agency's (USEPA's) regulations regarding the disposal of coal combustion residuals (CCR) in landfills and surface impoundments (40 CFR 257 Subpart D, "CCR rule"), a detection monitoring event was completed on March 12- 13, 2019 at the Fly Ash Pond (FAP), an existing CCR unit at the John E. Amos Plant located in Winfield, West Virginia.

Eight background monitoring events were conducted at the Amos FAP prior to this detection monitoring event, and upper prediction limits (UPLs) were calculated for each Appendix III parameter to represent background values. Lower prediction limits (LPLs) were also calculated for pH. Details on the calculation of these background values are described in Geosyntec's *Statistical Analysis Summary* report, dated July 15, 2019.

To achieve an acceptably high statistical power while maintaining a site-wide false-positive rate (SWFPR) of 10% per year or less, prediction limits were calculated based on a one-of-three retesting procedure. With this procedure, a statistically significant increase (SSI) would be concluded only if all three samples in a series of three exceeds the UPL (or is below the LPL for pH). In practice, if the initial or second result did not exceed the UPL, subsequent samples were not collected or analyzed.

Detection monitoring results and the relevant background values are summarized in Table 1. No SSIs were observed at the Amos FAP CCR unit, and as a result the Amos FAP will remain in detection monitoring.

Evaluation of Detection Monitoring Data – Amos FAP July 15, 2019 Page 2

The statistical analysis was conducted within 90 days of completion of sampling and analysis in accordance with 40 CFR 257.93(h)(2). A certification of these statistics by a qualified professional engineer is provided in Attachment A.

Table 1: Detection Monitoring Data Evaluation Amos Plant - Fly Ash Pond

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

*: Designates results for a duplicate sample

-: Not Sampled

Bold values exceed the background value.

Background values are shaded gray.

Based on a 1-of-2 resampling, a statistically significant increase (SSI) is only identified when both samples in the detection monitoring period are above the calculated background value.

ATTACHMENT A Certification by Qualified Professional Engineer

CERTIFICATION BY QUALIFIED PROFESSIONAL ENGINEER

I certify that the selected statistical method, described above and in the January 15, 2018 Statistical Analysis Summary report, is appropriate for evaluating the groundwater monitoring data for the Amos FAP CCR management area and that the requirements of 40 CFR 257.93(f) have been met.

DAVID ANTHONY MILLER

Printed Name of Licensed Professional Engineer

David Anthony Miller

Signature

22663

WEST VIRGINIA

License Number

Licensing State

07.15.19

Date

APPENDIX 3

Not applicable.

APPENDIX 4

Not applicable.

APPENDIX 5

Not applicable.

Annual Groundwater Monitoring Report

Appalachian Power Company John E. Amos Plant Landfill CCR Management Unit Winfield, West Virginia

January 2020

Prepared by: American Electric Power Service Corporation 1 Riverside Plaza Columbus, Ohio 43215

Table of Contents Page

Appendix 1 – GW Quality Data, GW Flow Directions, GW Flow Rates

- **Appendix 2** GW Quality Data Statistical Analysis
- **Appendix 3** Alternative Source Demonstrations
- **Appendix 4** Notices of Monitoring Program Transitions
- **Appendix 5** Well Installation/Decommissioning Logs

I. Overview

This *Annual Groundwater Monitoring* (Report) has been prepared to report the status of activities for the preceding year for an existing Landfill CCR unit at Appalachian Power Company's, a wholly-owned subsidiary of American Electric Power Company (AEP), John E. Amos Power Plant. The USEPA's CCR rules require that the Annual Groundwater Monitoring Report be posted to the operating record for the preceding year no later than January 31.

In general, the following activities were completed:

- Groundwater data underwent various validation tests, including tests for completeness, valid values, transcription errors, and consistent units.
- Statistical analyses of the November 2018 and June 2019 detection monitoring samples were completed in 2019. The statistical analysis determined that Appendix III SSIs were observed.
- As required by the CCR detection monitoring rules, semi-annual groundwater sampling events to include the Appendix III parameters were performed in June and November 2019 in accordance with 40 CFR §§257.94. Based on the results, verification sampling events were completed for respective potential SSIs. The verification sampling, analytical analysis, and statistical analysis for the November 2018 event was completed in 2019. This resulted in confirmed SSIs and an ASD was successfully completed. SSIs were confirmed for the June 2019 sampling event. Laboratory analytical is on-going for the November 2019 event. An alternative source demonstration was undertaken and completed related to the SSI confirmed for the June 2019 detection monitoring event in accordance with 40 CFR §257.94(e)(2). The demonstrations to date have been successful and are discussed below. If potential SSIs are observed from the November 2019 detection sampling, verification samples will be obtained and statistical analysis completed. If an SSI is confirmed, an ASD will be attempted and completed to determine if the SSI is valid.
- Two additional downgradient groundwater monitoring wells were installed at the CCR Unit in 2018 and were discussed in last year's annual report. These monitoring wells are discussed below. The boring logs and well construction forms are included in this report.

The major components of this annual report, to the extent applicable at this time, are presented in sections that follow:

- A map/aerial photograph showing the Amos Landfill CCR management unit, all groundwater monitoring wells, and monitoring well identification numbers.
- Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a statement as to why that happened (**Appendix 5**).
- All of the monitoring data collected, including the rate and direction of groundwater flow, plus a summary showing the number of samples collected per monitoring well, the dates the samples were collected and whether the sample was collected as part of detection monitoring or assessment monitoring programs (**Appendix 1**).
- Results of the required statistical analysis of groundwater monitoring results (**Appendix 2**).
- Discussion of the successful alternative source demonstrations (**Appendix 3**).
- A summary of any transition between monitoring programs or an alternate monitoring frequency, for example the date and circumstances for transitioning from detection monitoring to assessment monitoring, in addition to identifying the constituents detected at a statistically significant increase over background concentrations, if applicable (**Appendix 4**).
- Other information required to be included in the annual report such as assessment of corrective measures, if applicable.

In addition, this report summarizes key actions completed, and where applicable, describes any problems encountered and actions taken to resolve those problems. The report includes a projection of key activities for the upcoming year.

II. Groundwater Monitoring Well Locations and Identification Numbers

Figure 1 depicts the PE-certified groundwater monitoring network, the monitoring well locations, and their corresponding identification numbers. The monitoring well distribution adequately covers downgradient and upgradient areas as detailed in the *Groundwater Monitoring Network Evaluation Report* that was placed in the American Electric Power CCR public internet site on March 9, 2017.The groundwater quality monitoring network includes the following:

- Five upgradient wells: MW-6, MW-7R, MW-8, MW-9, and MW-10; and
- Four downgradient wells: MW-1, MW-2, MW-4, and MW-5.

P:\Projects\AEP\Groundwater Statistical Evaluation - CHA8423\Groundwater Mapping\GIS Files\MXD\Amos\AEP-Amos_Landfill_Site_Layout.mxd. CGregory. 1/26/2018. CHA8423/04/08.

 $\underset{\text{consultants}}{\text{Geosyntec}}$ Columbus, Ohio 2018/01/26

AEP Amos Generating Plant Winfield, West Virginia

Site Layout FGD Landfill

Figure

1

A Upgradient Sampling Location

C Downgradient Sampling Location

FGD Landfill

Notes - Monitoring well coordinates provided by AEP. 700 350 0 700

Feet

III. Monitoring Wells Installed or Decommissioned

There were two monitoring wells installed in 2018 at the Amos Plant Landfill. MW-1801 was installed downgradient of the south valley portion of the landfill. MW-1802 was installed downgradient of the north valley portion of the landfill. These wells were installed in late 2018 and are currently being evaluated for use in the CCR groundwater monitoring network as downgradient groundwater sampling and/or static water level gauging locations. Boring logs and monitoring well construction forms are included in **Appendix 5**.

IV. Groundwater Quality Data and Static Water Elevation Data, With Flow Rate and Direction Calculations and Discussion

Appendix 1 contains tables showing the groundwater quality data collected since initiating CCR background sampling through results received in 2019 as part of the detection monitoring program. Static water elevation data from each monitoring event in 2019 are also shown in **Appendix 1**, along with the groundwater velocity calculations, groundwater flow direction, and potentiometric maps developed after each sampling event.

V. Groundwater Quality Data Statistical Analysis

Statistical analysis of the November 2018 detection monitoring samples was completed in March 2019. Statistically significant increases (SSIs) in the Appendix III parameters of boron and chloride were documented in the March 6, 2019 *Evaluation of Detection Monitoring Data at Amos Plant's Landfill* memorandum (**Appendix 2**). An alternative source demonstration was undertaken for these parameters and was successful. That demonstration is discussed in the next section of this report.

Statistical analysis of the detection monitoring samples taken in June 2019 was completed in August 2019. Statistically significant increase (SSI) in the Appendix III parameter of chloride was documented in the statistical analysis memo included in **Appendix 2**. An alternative source demonstration was undertaken for this parameter and was successful. That demonstration is discussed in the next section of this report.

Statistical analysis of the detection monitoring samples taken in November 2019 will be completed in 2020. If SSIs are confirmed, an alternative source demonstration will be performed in accordance with 40 CFR §257.94(e)(2).

VI. Alternative Source Demonstration

An alternative source demonstration (ASD) relative to the Appendix III SSIs resulting from the November 2018 detection monitoring event of the federal CCR Rule was performed and completed in March 2019. The demonstration concluded that the groundwater quality and Appendix III indicator parameter SSIs identified in the statistical evaluation are attributable to an alternative source. The successful ASD for Appendix III parameters is attached in **Appendix 3**.

An alternative source demonstration (ASD) relative to the Appendix III SSI resulting from the June 2019 detection monitoring event of the federal CCR Rule was performed and completed in October 2019. The demonstration concluded that the groundwater quality and Appendix III indicator parameter SSI identified in the statistical evaluation is attributable to an alternative source. The successful ASD for the Appendix III parameter is attached in **Appendix 3**.

VII. Discussion About Transition Between Monitoring Requirements or Alternate Monitoring Frequency

As of this annual report date there has been no transition between detection monitoring and assessment monitoring. Detection monitoring will continue in 2020 pending the results of the aforementioned statistical analysis regarding the November 2019 groundwater sampling event. If the statistical analysis confirms any SSIs, an ASD will be performed if applicable. The sampling frequency of twice per year will be maintained for the Appendix III parameters upon a successful alternative source demonstration. If necessary, a transition to the assessment monitoring program will occur.

Regarding defining an alternate monitoring frequency, the groundwater velocity and monitoring well production are high enough at this facility that no modification to the semiannual assessment monitoring frequency is needed.

VIII. Other Information Required

All required information has been included in this annual groundwater monitoring report.

IX. Description of Any Problems Encountered in 2019 and Actions Taken

No significant problems were encountered. The low flow sampling effort went smoothly and the schedule was met to support the 2019 annual groundwater report preparation covering the year 2019 groundwater monitoring activities.

X. A Projection of Key Activities for the Upcoming Year

Key activities for 2020 include:

- Complete the statistical evaluation of the November 2019 detection monitoring results and subsequent verification sampling, looking for any statistically significant increases, or decreases when pH is considered.
- Continue detection monitoring on a semi-annual basis.
- Continue evaluation of the new groundwater monitoring wells installed downgradient of the CCR unit for inclusion in the CCR groundwater monitoring network.
- Respond to any new data received in light of what the CCR rule requires.
- Preparation of the 2020 annual groundwater report.

Tables follow, showing the groundwater monitoring data collected and received in 2019 or prior, the rate and direction of groundwater flow, and a summary showing the number of samples collected per monitoring well. The dates that the samples were collected also is shown.

Table 1 - Groundwater Data Summary: MW-1 Amos - LF Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-1 Amos - LF Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table 1 - Groundwater Data Summary: MW-2 Amos - LFAppendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-2 Amos - LF Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table 1 - Groundwater Data Summary: MW-4 Amos - LF Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-4 Amos - LF Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table 1 - Groundwater Data Summary: MW-5 Amos - LF Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-5 Amos - LF Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table 1 - Groundwater Data Summary: MW-6 Amos - LF Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-6 Amos - LF Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter
Table 1 - Groundwater Data Summary: MW-7R Amos - LF Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-7R Amos - LF Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table 1 - Groundwater Data Summary: MW-8 Amos - LF Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-8 Amos - LF Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table 1 - Groundwater Data Summary: MW-9 Amos - LF Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-9 Amos - LF Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table 1 - Groundwater Data Summary: MW-10 Amos - LF Appendix III Constituents

Notes:

mg/L: milligrams per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

Table 1 - Groundwater Data Summary: MW-10 Amos - LF Appendix IV Constituents

Notes:

µg/L: micrograms per liter

SU: standard unit

<: Non-detect value. Parameters which were not detected are shown as less than the method detection limit (MDL) followed by a 'U' flag.

J: Estimated value. Parameter was detected at concentration below the reporting limit

- -: Not analyzed

pCi/L: picocuries per liter

Table ²: Residence Time Calculation SummaryAmos Landfill

Notes:

[1] - Background Well

[2] - Downgradient Well

 $\frac{1}{2}$ l N

 \blacksquare _{Feet}

Legend

- ♦ Groundwater Monitoring Well
- \triangle Piezometer
- Groundwater Flow Direction
- Groundwater Elevation Contour

Notes

- Monitoring well coordinates and water level data (collected on June 10, 2019) provided by AEP.
- Potentiometric surface contour interval is 40 feet.
- Topography and drainage system basemap from AEP Drawing No. 13-30500-05-A
- (topographic contour interval: 10 feet).
- Groundwater elevation units are feet above mean sea level.

APPENDIX 2

The statistical analysis reports follow.

941 Chatham Lane, Suite 103 Columbus, Ohio 43212 PH 614.468.0415 FAX 614.468.0416 www.geosyntec.com

Memorandum

In accordance with the United States Environmental Protection Agency's (USEPA's) regulations regarding the disposal of coal combustion residuals (CCR) in landfills and surface impoundments (40 CFR 257 Part D, "CCR rule"), detection monitoring events were completed on November 28-29, 2018 and December 17-18, 2018 at the Landfill (LF), an existing CCR unit at the Amos Power Plant located in Winfield, West Virginia.

Upper prediction limits (UPLs) were calculated for each Appendix III parameter to represent background values based on the eight background monitoring events conducted prior to October 17, 2017. Lower prediction limits (LPLs) were also calculated for pH. Details on the calculation of these background values are described in Geosyntec's Statistical Analysis Summary report, dated January 15, 2018. An alternative source demonstration (ASD) was certified on April 13, 2018 which resulted in a revision to the calculated prediction limits for boron and fluoride.

To achieve an acceptably high statistical power while maintaining a site-wide false-positive rate (SWFPR) of 10% per year or less, prediction limits were calculated based on a one-of-two retesting procedure. With this procedure, a statistically significant increase (SSI) is only concluded if both samples in a series of two exceeds the UPL. In practice, if the initial result did not exceed the UPL, a second sample was not collected or analyzed.

Detection monitoring results and the relevant background values are compared in Table 1 and noted exceedances are described in the list below.

Evaluation of Detection Monitoring Data - Amos LF March 6, 2019 Page 2

- Boron concentrations exceeded the intrawell UPL of 0.231 mg/L in both the initial (0.235) mg/L) and second (0.285 mg/L) samples collected at MW-2. Therefore, an SSI over background is concluded for boron at MW-2.
- Chloride concentrations exceeded the intrawell UPL of 3.81 mg/L in both the initial (4.86) mg/L) and second (4.77 mg/L) samples collected at MW-5. Therefore, an SSI over background is concluded for chloride at MW-5.

In response to the exceedances noted above the Amos LF CCR unit will either transition to assessment monitoring or an alternate source demonstration for boron and chloride will be conducted.

The statistical analysis was conducted within 90 days of completion of sampling and analysis in accordance with 40 CFR 259.93(h)(2). A certification of these statistics by a qualified professional engineer is provided in Attachment A.

Table 1: Detection Monitoring Data Evaluation

 $\mathcal{L}^{\mathcal{I}}$

Amos Plant - Landfill

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

-: Not Sampled

Bold values exceed the background value.

Background values are shaded gray.

Based on a 1-of-2 resampling, a statistically significant increase (SSI) is only identified when both samples in the detection monitoring period are above the calculated

CERTIFICATION BY QUALIFIED PROFESSIONAL ENGINEER

I certify that the selected statistical method, described above and in the January 15, 2018 Statistical Analysis Summary report, is appropriate for evaluating the groundwater monitoring data for the Amos LF CCR management area and that the requirements of 40 CFR 257.93(f) have been met.

DAVID ANTHONY MILLER

Printed Name of Licensed Professional Engineer

aural Suthony Miller

Signature

22663 License Number

WEST VIRGINLA **Licensing State**

03.19.19 Date

941 Chatham Lane, Suite 103 Columbus, Ohio 43212 PH 614.468.0415 FAX 614.468.0416 www.geosyntec.com

Memorandum

In accordance with the United States Environmental Protection Agency's (USEPA's) regulations regarding the disposal of coal combustion residuals (CCR) in landfills and surface impoundments (40 CFR 257 Part D, "CCR rule"), detection monitoring sampling events were completed on June 11-12, 2019 and July 22, 2019 at the Landfill (LF), an existing CCR unit at the Amos Power Plant located in Winfield, West Virginia.

Upper prediction limits (UPLs) were calculated for each Appendix III parameter to represent background values based on the eight background monitoring events conducted prior to October 17, 2017. Lower prediction limits (LPLs) were also calculated for pH. Details on the calculation of these background values are described in Geosyntec's Statistical Analysis Summary report, dated January 15, 2018. An alternative source demonstration (ASD) was certified on April 13, 2018 which resulted in a revision to the calculated prediction limits for boron and fluoride.

To achieve an acceptably high statistical power while maintaining a site-wide false-positive rate (SWFPR) of 10% per year or less, prediction limits were calculated based on a one-of-two retesting procedure. With this procedure, a statistically significant increase (SSI) is only concluded if both samples in a series of two exceeds the UPL. In practice, if the initial result did not exceed the UPL, a second sample was not collected or analyzed.

Detection monitoring results and the relevant background values are compared in Table 1. Chloride concentrations exceeded the intrawell UPL of 3.81 mg/L in both the initial (4.60 mg/L) and second (4.61 mg/L) samples collected at MW-5. Therefore, an SSI over background is concluded for chloride at MW-5.

20190827_Amos LF_1st2019 engineers | scientists | innovators Evaluation of Detection Monitoring Data - Amos LF August 27, 2019 Page 2

In response to the exceedances noted above the Amos LF CCR unit will either transition to assessment monitoring or an alternate source demonstration for chloride will be conducted.

The statistical analysis was conducted within 90 days of completion of sampling and analysis in accordance with 40 CFR 259.93(h)(2). A certification of these statistics by a qualified professional engineer is provided in Attachment A.

Table 1: Detection Monitoring Data Evaluation Amos Plant - Landfill

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

Bold values exceed the background value.

Background values are shaded gray.

--: Not Sampled

Based on a 1-of-2 resampling, a statistically significant increase (SSI) is only identified when both samples in the detection monitoring period are above the UPL.

ATTACHMENT A Certification by Qualified Professional Engineer

CERTIFICATION BY QUALIFIED PROFESSIONAL ENGINEER

I certify that the selected statistical method, described above and in the January 15, 2018 Statistical Analysis Summary report, is appropriate for evaluating the groundwater monitoring data for the Amos LF CCR management area and that the requirements of 40 CFR 257.93(f) have been met.

DAVID ANTHONY MILLER

Printed Name of Licensed Professional Engineer

David Anthony Miller

Signature

22663

aring,

08-29.19 Date

License Number

WEST VIRGINIA
Licensing State

The alternative source demonstrations follow.

ALTERNATIVE SOURCE DEMONSTRATION REPORT FEDERAL CCR RULE

Amos Plant Landfill Winfield, West Virginia

Submitted to

1 Riverside Plaza Columbus, Ohio 43215-2372

Submitted by

engineers | scientists | innovators

941 Chatham Lane, Suite 103 Columbus, Ohio 43221

March 15, 2019

CHA8462

TABLE OF CONTENTS

LIST OF TABLES

Table 1 Detection Monitoring Data Evaluation

LIST OF FIGURES

Figure 1 Site Layout

LIST OF ATTACHMENTS

Attachment A Analytical Laboratory Data – November 2018 Quality Control Samples Attachment B Analytical Laboratory Data – December 2018 Quality Control Samples Attachment C Analytical Laboratory Data – January 2019 MW-2 Sampling Attachment D Certification by a Qualified Professional Engineer

LIST OF ACRONYMS AND ABBREVIATIONS

SECTION 1

INTRODUCTION AND SUMMARY

Eight background monitoring events were previously conducted at the Amos Plant Landfill according to the Coal Combustion Residuals (CCR) Rule [40 CFR 257.90 *et seq.*]. Upper prediction limits (UPLs) were calculated for each Appendix III parameter and lower prediction limits (LPLs) were also calculated for pH, to represent background values. A one-of-two retesting procedure was employed for all groundwater samples collected in the monitoring well network. On this basis a statistically significant increase (SSI) is concluded only if both samples in a series of two exceed the UPL or lie below the LPL in the case of pH. Generally, if the initial result did not exceed a prediction limit, a second sample was not collected. These prediction limits were recalculated to reflect natural variability, as described in the Alternate Source Demonstration (ASD) report prepared on April 13, 2018 (Geosyntec, 2018).

The second semi-annual detection monitoring event of 2018 was completed in November and December 2018, and the results were compared to the calculated prediction limits. SSIs were identified for the following constituents listed in 40 CFR Part 257 Appendix III:

- Boron at MW-2; and
- Chloride at MW-5.

The two SSIs above were based on intrawell comparisons, following the procedure indicated in the April 2018 ASD report. A summary of the detection monitoring analytical results and the calculated prediction limits to which they were compared are listed in Table 1.

1.1 CCR Rule Requirements

In accordance with the United States Environmental Protection Agency (USEPA) regulations regarding the disposal of CCR in landfills and surface impoundments, Rule 40 CFR 257.94(e)(2) states the following:

The owner or 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 to include obtaining a certification from a qualified professional engineer verifying the accuracy of the information in the report.

The second semi-annual detection monitoring event for 2018 was completed in November and December 2018 at the Amos Plant Landfill to identify SSIs over background limits. Pursuant to 40 CFR 257.94(e)(2), Geosyntec Consultants, Inc. (Geosyntec) has prepared this ASD report, which documents that the SSIs cited above should not be attributed to the Amos Plant Landfill.

1.2 Demonstration of Alternative Sources

An evaluation was completed to assess possible alternative sources to which identified SSIs could be attributed. Alternative sources were identified amongst five types, based on methodology provided by EPRI (2017):

- ASD Type I: Sampling Causes;
- ASD Type II: Laboratory Causes;
- ASD Type III: Statistical Evaluation Causes;
- ASD Type IV: Natural Variation; and
- ASD Type V: Alternative Sources.

A demonstration was conducted to show that the increases in constituent concentrations were based on a Type I cause at MW-2 and a Type V cause at MW-5 and not by a release from the Amos Plant Landfill.

SECTION 2

ALTERNATIVE SOURCE DEMONSTRATION

The CCR Rule allows the owner or operator 90 days from the determination of an SSI to demonstrate that a source other than the CCR unit caused the SSI. Identified SSIs, evaluation methodology, and the proposed alternative source are described below.

2.1 Proposed Alternative Source

A review of the sampling methods used identified a Type I issue for the boron SSI at MW-2. A review of the laboratory and statistical methods used did not identify any Type II or Type III issues. A review of site geochemistry revealed anthropogenic impacts as a source of the chloride SSI at MW-5, which is a Type V ASD.

2.1.1 MW-2

A review of the field quality control (QC) sample results for the November 2018 sampling event identified boron contamination in the equipment blanks and field blanks, which likely impacted the associated sample result as a high bias for boron. An equipment blank and field blank were routinely collected during each sampling event to evaluate the equipment decontamination procedure and ambient environmental conditions where sample collection took place.

The boron concentration at MW-2 was 0.235 milligrams per liter (mg/L). However, boron was detected in the equipment blank and field blank at 0.04 and 0.05 mg/L, respectively. Because the blank concentrations are greater than 10% of the sample concentration, the sample result is considered suspect. The QC procedure indicates that the sample result should be considered estimated with a high bias. The November 2018 analytical report may be found in Attachment A.

A verification sample was collected at MW-2 in December 2018, with a reported boron concentration of 0.285 mg/L. Again, boron was detected in the equipment blank and field blank (0.03 mg/L and 0.02 mg/L, respectively). The boron detection in the equipment blank is greater than 10% of the sample concentration and, therefore, the sample result is considered suspect. The QC procedure again indicates that the sample result should be considered estimated with a high bias. These results are contained in the December 2018 analytical report (Attachment B).

To verify whether cross contamination resulted in biased sample results, an additional sample and duplicate sample were collected at MW-2 on January 24, 2019. A field blank and equipment blank were also collected during this event. The reported boron concentrations for the primary and duplicate samples at MW-2 were 0.218 and 0.212 mg/L, respectively, which are below the intrawell UPL (0.231 mg/L). Boron was not detected in either the field blank or the equipment blank during this sampling event, suggesting that cross-contamination was not an issue during the January 2019 sampling event. The analytical report for this event may be found in Attachment C.

These observations indicate that a Type I alternative source was responsible for the boron SSI at MW-2. The additional samples collected at MW-2 on January 24, 2019, in which the boron concentration was found to be 0.218 mg/L in the primary sample (and 0.212 mg/L in the duplicate), is considered more representative of the groundwater conditions at MW-2 than both the initial sample collected in November 2018 and the verification sample collected in December 2018 for the reasons described above.

2.1.2 MW-5

The Amos Plant Landfill consists of a northern valley and southern valley which are surrounded by bedrock ridges. A topographic high point separates the two valleys (Arcadis, 2016), as shown in Figure 1. MW-5 is a designated downgradient well in the northern valley, which is hydrologically distinct from the southern valley, due to separation by the topographic high point. Significantly, no CCR waste has yet been placed in the northern valley, although landfill construction has been ongoing since 2013. The absence of CCR waste in the northern valley makes it extremely unlikely that the chloride SSI is attributable to CCRs at MW-5.

In addition, MW-5 is a shallow well which is screened between 5 and 10 feet below ground surface (bgs) and intercepts a perched groundwater zone (referred to in Figure 5B of the Groundwater Monitoring Well Network Evaluation report by Arcadis, 2016). The proximity of the screened interval to the ground surface suggests that MW-5 may be susceptible to impacts from surface activities in the northern valley. For example, construction activities, which include excavation and stockpiling as well as road salting may have released chloride which has affected the perched water table.

In conclusion, because MW-5 was installed in the perched groundwater zone and has a shallow screen depth (5-10 ft bgs), groundwater quality at MW-5 is potentially susceptible to influence from non-CCR sources as described above. Additionally, the absence of waste placement at hydrologically upgradient locations suggest that the SSIs for chloride have not been caused by a release from the storage unit. Thus, the exceedance at MW-5 was attributed to a Type V issue.

2.2 Sampling Requirements

As this ASD supports a position that the identified SSIs are not due to a release from the Amos Plant Landfill, the unit will remain in the detection monitoring program. Groundwater at the unit will continue to be sampled for Appendix III parameters on a semi-annual basis.

SECTION 3

CONCLUSIONS AND RECOMMENDATIONS

The preceding information serves as the ASD prepared in accordance with 40 CFR 257.94(e)(2) and supports the position that the SSIs in Appendix III detection monitoring constituents are not due to a release from the Amos Plant Landfill during the second semi-annual detection monitoring event that was conducted in November and December 2018. A review of sampling results identified sampling errors which likely resulted in the boron SSI at MW-2. The lack of waste placement upgradient of MW-5 provides evidence that the observed chloride concentrations were not caused by a release from the Landfill. Therefore, no further action is warranted, and the Amos Plant Landfill will remain in the detection monitoring program.

SECTION 4

REFERENCES

Arcadis. 2016. FGD Landfill – CCR Groundwater Monitoring Well Network Evaluation. October 2016.

- EPRI, 2017. Guidelines for Development of Alternative Source Demonstrations at Coal Combustion Residual Site. 3002010920. October 2017.
- Geosyntec Consultants, 2018. Alternative Source Demonstration Report Federal CCR Rule. Amos Plant Landfill. April 2018.
- U.S. EPA, 2015. Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities (Final Rule). Fed. Reg. 80 FR 21301, pp. 21301-21501, 40 CFR Parts 257 and 261, April.

TABLES

Table 1: Detection Monitoring Data Evaluation Amos Plant - Landfill

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

-: Not Sampled

Bold values exceed the background value.

Background values are shaded gray.

Based on a 1-of-2 resampling, a statistically significant increase (SSI) is only identified when both samples in the detection monitoring period are above the calculated

FIGURES

- Northern Valley
- Southern Valley
- Inferred Groundwater Flow Direction **FGD** Landfill

AEP Amos Generating Plant Winfield, West Virginia

- **A** Upgradient Sampling Location
- **C** Downgradient Sampling Location

FGD Landfill

1

Columb

Name

- Monitoring well coordinates provided by AEP.

- Aerial imagery provided by DigitalGlobe and dated 8/30/2016.

HA8423\Groundwater Mapping\GIS Files\MXD\Amos\AEP-Amos_Landfill_Site_Layout_GW Flow_2018-04_April.mxd. SKaroly. 9/28/2018. CHA8423/04/0

ATTACHMENT A

ANALYTICAL LABORATORY DATA NOVEMBER 2018 QUALITY CONTROL SAMPLES

Location: Amos Plant Report Date: 12/7/2018

LF-CCR-Dup Dissolved

LF-CCR-FB

LF-CCR-EB

U: Analyte was analyzed and not detected at or above adjusted Method Detection Limit

J: Analyte was positively identified, though the quantitation was below Reporting Limit.

Muhael & Ollinger

Michael Ohlinger, Chemist Email msohlinger@aep.com Tel. Fax 614-836-4168 Audinet 8-210-

THIS TEST REPORT RELATES ONLY TO THE ITEMS TESTED AND SHALL NOT BE REPRODUCED EXCEPT IN FULL WITHOUT WRITTEN APPROVAL OF THE LABORATORY. ALL TEST RESULTS MEET ALL OF THE REQUIREMENTS OF THE ACCREDITING AUTHORITY, UNLESS OTHERWISE NOTED.

ATTACHMENT B

ANALYTICAL LABORATORY DATA DECEMBER 2018 QUALITY CONTROL SAMPLES

Form REP-703 Rev. 1, 11/2013

Dolan Chemical Laboratory 4001 Bixby Road Groveport, OH 43125 T: 614-836-4221, Audinet 210-4221 F: 614-836-4168, Audinet 210-4168 http://aepenv/labs

Water Analysis

Location: Amos Plant Report Date: 12/26/2018

Location: Amos Plant Report Date: 12/26/2018

LF-Verification-DUP-1

U: Analyte was analyzed and not detected at or above adjusted Method Detection Limit

J: Analyte was positively identified, though the quantitation was below Reporting Limit.

Muhael & Ohlinger

Michael Ohlinger, Chemist

Email msohlinger@aep.com Tel.

Fax 614-836-4168 Audinet 8-210-

THIS TEST REPORT RELATES ONLY TO THE ITEMS TESTED AND SHALL NOT BE REPRODUCED EXCEPT IN FULL WITHOUT WRITTEN APPROVAL OF THE LABORATORY. ALL TEST RESULTS MEET ALL OF THE REQUIREMENTS OF THE ACCREDITING AUTHORITY, UNLESS OTHERWISE NOTED.

ATTACHMENT C

ANALYTICAL LABORATORY DATA JANUARY 2019 QUALITY CONTROL SAMPLES

Form REP-703 Rev. 1, 11/2013

Dolan Chemical Laboratory 4001 Bixby Road Groveport, OH 43125 T: 614-836-4221, Audinet 210-4221 F: 614-836-4168, Audinet 210-4168 http://aepenv/labs

Water Analysis

Location: Amos Plant Report Date: 2/7/2019

U: Analyte was analyzed and not detected at or above adjusted Method Detection Limit

J: Analyte was positively identified, though the quantitation was below Reporting Limit.

Michael & Ohlinger

Michael Ohlinger, Chemist

Email msohlinger@aep.com Tel.

Fax 614-836-4168 Audinet 8-210-

THIS TEST REPORT RELATES ONLY TO THE ITEMS TESTED AND SHALL NOT BE REPRODUCED EXCEPT IN FULL WITHOUT WRITTEN APPROVAL OF THE LABORATORY. ALL TEST RESULTS MEET ALL OF THE REQUIREMENTS OF THE ACCREDITING AUTHORITY, UNLESS OTHERWISE NOTED.

ATTACHMENT D

CERTIFICATION BY A QUALIFIED PROFESSIONAL ENGINEER

CERTIFICATION BY A QUALIFIED PROFESSIONAL ENGINEER

I certify that the selected and above described alternative source demonstration is appropriate for evaluating the groundwater monitoring data for the Amos Landfill CCR management area and that the requirements of 40 CFR 257.94(e)(2) have been met.

John Seymon

Printed Name of Licensed Professional Engineer

 1194 Signature

 $\frac{1}{2}$ 17091 'F C

 $O(9)$ Date

License Number

709

Licensing State

Memorandum

A semi-annual detection monitoring event was recently completed at the Amos Plant Landfill in accordance with the Coal Combustion Residual (CCR) Rule [40CFR257.94]. The results of this event (Table 1) were compared to previously calculated upper prediction limits (UPLs) for each Appendix III parameter. In addition, the reported pH values were also compared to previously calculated lower prediction limits (LPLs). A statistically significant increase (SSI) was noted for chloride at well MW-5 during this detection monitoring event. No other SSIs were observed in the well network during this semi-annual detection monitoring event (Table 1).

DEMONSTRATION OF AN ALTERNATIVE SOURCE

SSIs for chloride were identified at well MW-5 for three previous detection monitoring events (November 2017, April 2018, and November 2018). In all three instances, alternative source demonstrations (ASD) were prepared (Geosyntec, 2018a; Geosyntec, 2018b; Geosyntec, 2019). For the current semi-annual detection monitoring event, the SSI was concluded after the intrawell background UPL for chloride was exceeded in both the initial and verification sampling events completed on June 12, 2019 and July 22, 2019, respectively. An evaluation was completed to assess possible alternative sources to which the identified SSI could be attributed. Alternative sources were identified amongst five types, based on methodology provided by EPRI (2017):

- ASD Type I: Sampling Causes;
- ASD Type II: Laboratory Causes;
- ASD Type III: Statistical Evaluation Causes;
- ASD Type IV: Natural Variation; and

Ben Kepchar 03 October 2019 Page 2

• ASD Type V: Alternative Sources.

The lack of waste placement hydrologically upgradient of MW-5 provides evidence that the observed chloride concentrations were not caused by a release from the Landfill. Using EPRI (2017) nomenclature, the SSI for chloride at well MW-5 was determined to be a Type IV alternative source.

The Amos Plant Landfill consists of a northern valley and southern valley which are surrounded by bedrock ridges. A topographic high point separates the two valleys (Arcadis, 2016) as shown in Figure 1. MW-5 is a designated downgradient well in the northern valley, which is hydrologically distinct from the southern valley, due to separation by the topographic high point. Significantly, no CCR waste has yet been placed in the northern valley, although landfill construction has been ongoing since 2013. The absence of CCR waste in the northern valley makes it extremely unlikely that the chloride SSI is attributable to CCRs at MW-5.

MW-5 is a shallow well that is screened between 5 and 10 feet below ground surface (bgs) and intercepts a perched groundwater zone (referred to in Figure 5B of the Groundwater Monitoring Well Network Evaluation report by Arcadis, 2016). The proximity of the screened interval to the ground surface suggests that MW-5 may be susceptible to impacts from surface activities in the northern valley. Landfill construction has been ongoing in the northern valley since 2013. Activities completed this year and in the past, such as excavation, stockpiling, road salting, and blasting, may have released chloride that has affected the perched water table.

In conclusion, because MW-5 was installed in the perched groundwater zone and has a shallow screen depth (5-10 ft bgs), groundwater quality at this location is potentially susceptible to influence from non-CCR sources such as construction road salting. Additionally, the absence of waste placement at hydrologically upgradient locations suggest that the SSI for chloride was not caused by a release from the storage unit. Therefore, the exceedance at MW-5 was attributed to a Type IV issue. The preceding information serves as the ASD prepared in accordance with 40 CFR 257.94(e)(2) and in agreement with the previous ASDs prepared for this unit (Geosyntec, 2018a; Geosyntec, 2018b; Geosyntec, 2019). Certification of this ASD by a qualified professional engineer is provided in Attachment A.

Arcadis, 2016. FGD Landfill – CCR Groundwater Monitoring Network Evaluation. October.

EPRI, 2017. Guidelines for Development of Alternative Source Demonstrations at Coal Combustion Residual Sites. 3002010920. October.

Ben Kepchar 03 October 2019 Page 3

Geosyntec, 2018a. Alternative Source Demonstration Report – Federal CCR Rule. Amos Plant Landfill. Winfield, West Virginia. April.

Geosyntec, 2018b. Alternative Source Demonstration Report – Federal CCR Rule. Amos Plant Landfill. Winfield, West Virginia. October.

Geosyntec, 2019. Alternative Source Demonstration Report – Federal CCR Rule. Amos Plant Landfill. Winfield, West Virginia. March

Table 1: Detection Monitoring Data Evaluation Amos Plant - Landfill

Notes:

UPL: Upper prediction limit

LPL: Lower prediction limit

Bold values exceed the background value.

Background values are shaded gray.

--: Not Sampled

Based on a 1-of-2 resampling,a statistically significant increase (SSI) is only identified when both samples in the detection monitoring period are above the UPL.

- Northern Valley
- Southern Valley
- Inferred Groundwater Flow Direction **FGD** Landfill

AEP Amos Generating Plant Winfield, West Virginia

- **A** Upgradient Sampling Location
- **C** Downgradient Sampling Location

FGD Landfill

1

Columb

Name

- Monitoring well coordinates provided by AEP.

- Aerial imagery provided by DigitalGlobe and dated 8/30/2016.
	-

P:\ProproductstaAEP\Groundwater Mapping\GIS Files\MXD\Amos\AEP-Amos_Landfill_Site_Layout_GW Flow_2018-04_April.mxd. SKaroly. 9/28/2018. CHA8423/04/0

CERTIFICATION BY A QUALIFIED PROFESSIONAL ENGINEER

I certify that the selected and above described alternative source demonstration is appropriate for evaluating the groundwater monitoring data for the Amos Landfill CCR management area and that the requirements of 40 CFR 257.94(e)(2) have been met.

License Number

Licensing State

Date

CHA8462 20191003 Amos LF ASD_memo engineers | scientists | innovators

APPENDIX 4

Not applicable.

Well installation/decommissioning logs follow.

Wireline Core

AEP.GDT - 5/3/19 11:49 - S:IKNOXVILLE-TMFOR NICOLE AEP LOG EDIT FILESIGINT LOGS OUTPUTAEP MOUNTAINEERVEP MOUNTAINEER.GPJ AEP - AEP.GDT - 5/3/19 11:49 - S:\KNOXVILLE-TN\FOR NICOLE AEP LOG EDIT FILES\GINT LOGS OUTPUT\AEP MOUNTAINEER\AEP MOUNTAINEER.GPJ

WV015976.0005 JOB NUMBER

COMPANY Entertian Electric Power The Soring No. 2008, 2014 The Section Section Section of the Soring Section S COMPANY **American Electric Power**

 \mathbf{r}

PROJECT LATTOS - FGD Landfill **And Amos - Amos Contract Contract Borger** BORING START LATT BORING FINISH 28/8/18

WV015976.0005 JOB NUMBER

COMPANY Entertial metal control of the company of the company of the company $\frac{1}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company of the company $\frac{5}{2}$ of the company of th **American Electric Power**

PROJECT **Amos - FGD Landfill**

BORING START 817/18 BORING FINISH 8/8/18

AEP - AEP CDT - 5/3/19 11:49 - S:\KNOXVILLE-TWFOR NICOLE AEP LOG EDIT FILES\GINT LOGS OUTPUTAEP MOUNTAINER AEP MOUNTAINEER.GPJ AEP - AEP.GDT - 5/3/19 11:49 - S:\KNOXVILLE-TN\FOR NICOLE AEP LOG EDIT FILES\GINT LOGS OUTPUT\AEP MOUNTAINEER\AEP MOUNTAINEER.GPJ

L.

WV015976.0005 JOB NUMBER

COMPANY Entertian Electric Power The Company of Boring No. 2004. The Section of the Section of the Section of S **American Electric Power**

Amos - FGD Landfill PROJECT <u>F</u>

BORING NO. **MW-1801** DATE **5/3/19** SHEET **4** (

AEP - AEP.GDT - 5/3/19 11:49 - S:\KNOXVILLE-TN\FOR NICOLE AEP LOG EDIT FILES\GINT LOGS OUTPUT\AEP MOUNTAINEER\AEP MOUNTAINEER.GPJ

AEP - AEP.GDT - 5/3/19 11:49 - S:KNOXVILLE-TNIFOR NICOLE AEP LOG EDIT FILES(GINT LOGS OUTPUTAEP MOUNTAINEER\AEP MOUNTAINEER.GPJ

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY Entertian Electric Power The Soring No. 2008, 2014 The Section Section Section Section Section Section S **American Electric Power**

PROJECT **Amos - FGD Landfill**

BORING START 817/18 BORING FINISH 8/8/18

WV015976.0005 JOB NUMBER

COMPANY Entertial metal control of the company of the company of the company $\frac{1}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company of the company of the company of the company **American Electric Power**

PROJECT **Amos - FGD Landfill**

BORING START 8/20/18 BORING FINISH 8/21/18

Continued Next Page

WV015976.0005 JOB NUMBER

COMPANY Entertial metal control of the company of the company of the company $\frac{1}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company of the company of the company of the company **American Electric Power**

AEP - AEP.GDT - 5/3/19 11:49 - S:\KNOXVILLE-TN\FOR NICOLE AEP LOG EDIT FILES\GINT LOGS OUTPUT\AEP MOUNTAINEER\AEP MOUNTAINEER.GPJ

PROJECT **Amos - FGD Landfill**

BORING START 8/20/18 BORING FINISH 8/21/18

WV015976.0005 JOB NUMBER

American Electric Power

PROJECT **Amos - FGD Landfill**

COMPANY Entertian Electric Power The Coring No. No. 2002. The Section of Section Sheet The Section of the Section Section of the Section Secti

BORING START 8/20/18 BORING FINISH 8/21/18

Continued Next Page

WV015976.0005 JOB NUMBER

LOG OF BORING

COMPANY **American Electric Power**

COMPANY Entertial metal control of the company of the company of the company $\frac{1}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company $\frac{5}{2}$ of the company of the company of the company of the company PROJECT LATTOS - FGD Landfill **And Amos - Among Latter Control Control**

 ~ 10

 $\begin{matrix} \end{matrix}$

 $\hat{\mathcal{F}}$

 $\bar{\mathcal{A}}$

Departme

Winfield

Columbus

 OH

1.Cap and Lock: 2. Protective Cover:

4. Borehole Diameter:

c.Material: PVC

13. Filter Pack Seal:

16.Screen: a.Material: PVC

17. Filter Pack:

b.Installation Proced 18. Well Depth:

43215-

w 25213-

County: Putnam

Site: Line 1:

City: State:

Zip:

Line 1: Line 2:

City:

State:

Zip:

Line 2:

22. Decontamination Procedures: Liqui-Nox w/high pressure water pump

21. Backfill Material (below filter pack): N/A

23. Special Circumstances and Exceptions: No Variance Number: 24 MMLContractor License No

Home | Log Out

[시행국어]

Appendix F

Structural stability assessment required at § 257.73(d)

STRUCTURAL STABILITY ASSESSMENT CFR 257.73(d)

Bottom Ash Ponds

John E. Amos Plant

October, 2016

Prepared for: Appalachian Power Company - John E. Amos Plant

1530 Winfield Rd,

Winfield, West Virginia 25213

Prepared by: American Electric Power Service Corporation

1 Riverside Plaza

Columbus, OH 43215

Document ID: GERS-16-124

Structural Stability Assessment CFR 257.73(d) JOHN E. AMOS PLANT **BOTTOM ASH COMPLEX**

 $\frac{10/3/2016}{10-3-2016}$ PREPARED BY DATE John T. Massey-Norton **DATE REVIEWED BY** Shahriyar S. Baig, P.E. APPROVED-BY **DATE** Gary F. Zych, Manager - AEP Geotechnical Engineering

I certify to the best of my knowledge, information and belief that the information contained in this structural stability assessment meets the requirements of 40 CFR 257.73(d)

1.0 OBJECTIVE 257.73(d)

This report was prepared by AEP- Geotechnical Engineering Services (GES) section to fulfill requirements of CFR 257.73(d) and document whether the design, construction, operations, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices. This is the initial assessment as per the Rule.

2.0 NAME AND DESCRIPTION OF CCR SURFACE IMPOUNDMENT

The John E. Amos Power Plant is located near Winfield, Putnam County, West Virginia. It is owned and operated by Appalachian Power Company (APCO). The facility operates one surface impoundment for storing CCR called the Bottom Ash Complex.

The Bottom Ash Complex is comprised of diked embankments on the north, east, and west sides. The south side of the Bottom Ash Complex is incised. There are four main ponds within the Bottom Ash Pond Complex as listed below.

List of Main Ponds within the Bottom Ash Complex

Bottom Ash Pond 1A **Bottom Ash Pond 1B Reclaim Pond Treatment/Clearwater Pond**

The north dike is approximately 800 feet long and is the highest dike at about 29 feet with a design crest width of 10 feet. The dike is comprised of concrete blocks back-filled with compacted soil that transitions to an earthen embankment. The top of the dike is at elevation 588.0 feet with the natural ground surface beneath the dikes is at about elevation 559 feet.

The north dike is located across a small tributary to Bill's Creek. This portion of Bill's Creek is controlled by the backwaters of the Kanawha River. The side slopes of embankment fill are designed to be 3:H to 1:V that transition to design side slopes 2:H to 1:V.

3.0 STABLE FOUNDATION AND ABUTMENTS 257.73(d)(1)(i)

[Was the facility designed for and constructed on stable foundations and abutments? Describe any foundation improvements required as part of construction.]

Based on the design drawings, a portion of the foundation was constructed on random rock fill within the former channel of Bill's Creek to form a working base for placement of a compacted shale/soil fill. A crushed limestone filter blanket was placed over the upstream face of the rock fill and capped with a clay soil. At a later date, an asphalt stabilization blanket was constructed along the upstream face.

The dike was raised in 2010 using a concrete block wall that transitions to an earthen embankment which in turn transitions to existing ground along the southern portion of the pond complex.

Based on recent subsurface investigations, the relative density and description of the foundation materials are adequate for this CCR unit.

4.0 SLOPE PROTECTION 257.73(d)(1)(ii)

[Describe the slope protection measures on the upstream and downstream slopes.]

The downstream slope of the north dike that parallels Bill's Creek is protected with a layer of riprap and transitions to a grass covered slope to the crest of the dike or to the base of the concrete block wall. The remaining downstream and upstream dike slopes are protected with a vegetative cover.

The current condition of the riprap layer is adequate. The remaining sections of the slopes above the riprap is vegetated and maintained. Any erosion that may occur is repaired within a timely period.

5.0 EMBANKMENT CONSTRUCTION 257.73 (d)(1)(iii)

[Describe the specifications for compaction and/or recent boring to give a relative comparison of density.]

Construction specifications for the 2010 dike raising required a QA/QC construction certification plan to ensure that the cohesive soils were placed and compacted in accordance with the design specifications.

Recent borings through the embankment indicate that the material is stiff and representative of compacted earthen materials.

6.0 VEGETATION CONTROL 257.73 (d)(1)(iv)

[Describe the maintenance plan for vegetative cover.]

The vegetative areas are mowed to facilitate inspections and maintain the growth of the vegetative layer; and prevent the growth of woody vegetation.

7.0 SPILLWAY SYSTEM 257.73(d)(1)(v)

[Describe the spillway system and its capacity to pass the Inflow Design Flood as per its Hazard **Classification.]**

The spillway system consists of a primary weir box and pipe for normal operations and two 36 inch diameter spillway pipes located along the north dike to pass flood events. The CCR unit has a Significant Hazard rating and is designed to safely pass 1/2 the probable maximum precipitation in accordance with the WV DEP dam safety regulations.

8.0 BURIED HYDRAULIC STRUCTURES 257.73 (d)(1)(vi)

[Describe the condition of the sections of any hydraulic structure that in buried beneath and/or in the embankment.]

The two 36 inch diameter spillway pipes are constructed through the concrete block wall and extend downslope such that the discharge is directed to the protective rip rap layer. The pipes are encased within a concrete fill as part of the wall construction.

9.0 SUDDEN DRAWDOWN 257.73 (d)(1)(vii)

[If the downstream slope is susceptible to inundation, discuss the stability due to a sudden drawdown.]

The north downstream slope may be partially inundated by the Kanawha River during extreme flood events. The condition for a sudden drawdown depends on the rate and duration of any given event.

A sudden drawdown scenario was not modeled for the embankment since flooding from the Kanawha River would not create the conditions necessary to be considered as a rapid drawdown event.

Appendix G

Safety factor assessment required at § 257.73(e)
CCR RULES CERTIFICATION REPORT JOHN AMOS PLANT - BOTTOM ASH COMPLEX PUTNAM COUNTY, WEST VIRGINIA

Prepared For:

AEP Service Corporation Geotechnical Engineering Group 1 Riverside Plaza **Columbus, OH 43215-2373**

Prepared By:

Geo/Environmental Associates, Inc. 3502 Overlook Circle Knoxville, TN 37909

> GA Project No. 15055009 **December 21, 2015**

TABLE OF CONTENTS

APPENDICES

Page

CCR RULES ASSESSMENT AND CERTIFICATION JOHN AMOS PLANT - BOTTOM ASH COMPLEX POCA, PUTNAM COUNTY, WEST VIRGINIA **DECEMBER 21, 2015**

INTRODUCTION

Geo/Environmental Associates, Inc. (GA) has performed a site visit, conducted an engineering assessment, and prepared a certification statement for the John Amos Plant - Bottom Ash Complex. These services were performed to meet specific requirements set forth in the Environmental Protection Agency's CCR Rules (i.e., 40 CFR Parts 257 and 261, "Hazardous and Solid Waste Management System, Disposal of Coal Combustion Residuals From Electric Utilities, Final Rule," dated April 17, 2015). Provided in this report is a discussion of GA's findings and a certification statement pertaining to the facility. Photographs, supplemental field and laboratory data, engineering analyses, and a drawing are included in the appendices.

REVIEW OF PREVIOUS ANALYSES AND SITE DESCRIPTION

The Amos Power Plant is situated in Putnam County, West Virginia within the physiographic province of the Appalachian Plateau. A more detailed description of the site geology is included in Appendix II. The Amos Power Plant primary and ancillary facilities are located along the southern bank of the Kanawha River along S.R. 35 approximately two miles northwest of Interstate I-64 at Scary, WV. The Bottom Ash Complex consists of two dams #1A WVA ID #07918 and #1B WVA ID #07919. The dams share a common earthen embankment across Bill's Creek with a series of splitter dikes to create four distinct cells referred to as Bottom Ash Pond No. 1A, Bottom Ash Pond No. 1B, Reclaim Water Pond and the Treatment Basin.

The earliest record available of the Bottom Ash Complex is dated June 28, 1970. There was an open channel that acted as the emergency spillway of an earthen dike structure on the northwest corner of the Bottom Ash Pond No. 1B.

Modifications to the site include: the 1977 construction of a road embankment on the northwest corner of the Bottom Ash Pond No. 1B, a sedimentation pond, and a splitter dike constructed on the southeast corner of the Bottom Ash Pond No. 1A for the sedimentation of pyrites (referred to as the Pyrites Pond). The construction of the roadway embankment effectively eliminated the northwest corner of the Bottom Ash Pond No. 1B from collecting additional bottom ash and from ponding water. An open channel spillway, that was part of the original construction, was abandoned prior to 1977.

CCR RULES ASSESSMENT AND CERTIFICATION JOHN AMOS POWER PLANT - BOTTOM ASH COMPLEX **DECEMBER 21, 2015** PAGE₂

Subsequent modifications, mostly associated with the operations of the ponds, have taken place since 1977. Perhaps the most relevant has been the elimination, from active use, of the sedimentation pond located along the west side of the Bottom Ash Pond No. 1B, illustrated on the 1977 drawing. In addition, higher than anticipated operating water levels could occur sporadically in the ponds during certain plant maintenance operations. Ash handling operations can also result in the localized accumulation of bottom ash at or above the operational water levels. The current configuration of the Bottom Ash Complex is shown on the drawings in Appendix VI.

Current operations of the ponds consist of sluicing bottom ash into ponds $#1A$ or $#1B$, allowing the particles to settle and the overflow to circulate to the reclaim pond from where the majority of the water is pumped back to the plant and the remaining water is allowed to overflow into the treatment pond before it is released into the Kanawha River at outfall No. 003. During the course of the year, the Bottom Ash Ponds are alternately taken out of service to allow for the removal of the bottom ash for beneficial re-use. Thus, it is commonly expected that, at the same time bottom ash slurry is sluiced into one pond, the other pond is being excavated.

The Bottom Ash Pond Complex is inspected by Plant personnel on a monthly basis and, under the direct supervision of a professional engineer, it is inspected annually. Reports of the engineer's inspection are forwarded to the West Virginia DEP Dam Safety office with the frequency established in the regulations for Class II facilities.

The main dike of the facility is about 1350 feet long. We were provided with a copy of a report titled "Report on Dam Safety Inspection Amos Fly Ash Dam and Amos Bottom Ash Dikes" dated March 1981, prepared by Woodward-Clyde Consultants. According to that report, the maximum height of the main dike above natural ground is about 24 feet.

GA performed design and analysis services for the facility in 2005 and 2008. We provided two reports, "Responses to February 15, 2005 DEP Review Letter," dated December 5, 2005 and "Responses to May 12, 2008 DEP Review Letter," dated May 22, 2008. Our work involved addressing West Virginia DEP concerns and also raising the main dikes from a minimum crest elevation of about 584 feet with a minimum crest width of about 15 feet, to a minimum elevation of 588 feet. The increased dike elevation was needed to operate the pool levels in Ash Ponds 1A

CCR RULES ASSESSMENT AND CERTIFICATION JOHN AMOS POWER PLANT - BOTTOM ASH COMPLEX **DECEMBER 21, 2015** PAGE 3

and 1B and the Reclaim Pond as high as elevation 583 feet under certain operating conditions while providing adequate storm storage and routing and maintaining at least one foot of freeboard during the design storm. Our work at the time included hydrologic, hydraulic, and stability analyses. The facility previously had an open channel spillway with bottom elevation 581 feet through the main dike at the Reclaim Water Pond. In our design we proposed two 36inch diameter polyethylene spillway pipes, both with inlet elevations of 583.5 feet.

In 2010, the main dikes were raised to the minimum proposed crest elevation of 588 feet. In addition to the main dike, the eastern side of the complex was raised to elevation 588 feet. In some areas the elevation 584 crest was wide enough such that it could be raised with 4 feet of soil fill and still maintain a minimum 10-foot-wide crest. In other areas that were too narrow to raise the crest with soil fill, a segmented retaining block system (Redi-rock) was used to achieve the elevation 588 feet crest. The drawings in Appendix VI show the areas where the block walls were constructed and a construction detail of the block wall system.

Field Investigation and Laboratory Testing

At the direction of AEPSC, eight borings were drilled through the main dike in August 2005 by H.C. Nutting Company of Charleston, West Virginia. The boring locations are shown on the drawings in Appendix VI. Boring logs are included in Appendix III. Standard Penetration Tests (SPT) were performed generally on 5-foot intervals. Relatively undisturbed samples were collected at selected locations using a thin walled sampler. Additionally, three standpipe piezometers were installed in the main dike during the drilling.

Borings B-1 through B-6 were drilled from the crest of the main dike. These borings generally encountered a stiff, lean clay, referred to as shale fill, from the ground surface to a depth of about 15 to 20 feet. Below the shale fill an interval of clayey gravel fill 8 to 10 feet thick was encountered. Below the clayey gravel, a 4 to 6-foot thick layer of soft clay and about a 20-foot thick layer of silty sand, both likely alluvial in origin, were encountered. Below the silty sand, residual weathered shale was encountered to the boring termination depths. Borings B-7 and B-8 were drilled on the downstream face of the main dike, near the water level of Bill's Creek. These two borings encountered strata consistent with borings B-1 through B-6.

CCR RULES ASSESSMENT AND CERTIFICATION JOHN AMOS POWER PLANT - BOTTOM ASH COMPLEX **DECEMBER 21, 2015** PAGE 4

Laboratory testing was performed by AEPSC on the SPT split-spoon samples and relatively undisturbed samples. Laboratory testing included moisture content, grain size analysis, classification, permeability, and strength testing. Laboratory test results are included in Appendix III. Laboratory test results are discussed in our comments regarding the stability of the dike.

SITE VISIT BY A PROFESSIONAL ENGINEER

At the request of AEPSC, GA personnel performed a site visit of the Bottom Ash Complex to observe and document the prevalent site conditions. Specifically, Seth W. Frank, P.E. (GA), performed a site inspection of the Bottom Ash Complex on August, 18, 2015. GA believes that the conditions observed, during the August 18, 2015, site visit, are representative of the conditions modeled in the assessment and analyses provided in this report. Pictures taken during the site visit are included in Appendix I.

HYDROLOGIC AND HYDRAULIC ANALYSES

GA's 2008 report included hydrologic and hydraulic analyses to meet WVDEP's design storm requirements for a Class II structure, which is one-half of the 6-hour Probable Maximum Precipitation (PMP) event (about 14 inches of rainfall in 6 hours). The spillway pipes, pool levels, and crest elevation were designed based on this event. GA used the U.S. Army Corps of Engineers HEC-1 computer program for the analyses. A summary of the results are shown in Table 1, and complete results are included in Appendix IV. As shown, the facility passes the design storm while maintaining adequate freeboard.

Pond	Crest Elev., ft	Normal Pool Elev., ft	Peak Pool Elev. During Storm, ft	Minimum Freeboard During Storm, ft
1A and Reclaim	588	583.2	585.43	2.57
1B	588	583.7	585.47	2.53

Table 1. Summary of Hydrologic Analyses

amos bac cer certification 12-21-15 wpd

STABILITY ANALYSES AND ACTION VALUES

We have performed stability analyses in general accordance to EPA's CCR requirements.

The requirements specify the following stability assessments:

- 1. Static factor of safety under the long-term, maximum storage pool condition,
- $2.$ Static factor of safety under the maximum surcharge pool condition.
- 3. Seismic factor of safety,
- 4. Liquefaction factor of safety,
- 5. End-of-construction factor of safety,

Limit equilibrium stability analyses were performed on sections B-B and C-C to assess the stability of the embankment. The stability analyses were performed with SLOPE/W, a component of the GeoStudio software package. SLOPE/W is formulated in terms of moment and force equilibrium factor of safety equations. Specifically, the Morgenstern-Price method was used to calculate the factor of safety of each section.

Strength parameters for the various materials used in the analyses are listed in Table 2. The properties of the various materials that comprise the embankment were determined from laboratory tests where appropriate samples could be obtained for testing. The parameters for other materials are based on typical material properties and our experience with similar materials. The Redi-rock reinforced embankment was conservatively assumed to have the strength parameters of the shale fill.

amos bac ccr certification_12-21-15.wpd

Table 2. Summary of Strength Parameters

 (1) Estimated from laboratory tests (See Appendix III).

 (2) Estimated based on material properties and experience with similar materials.

Stability analyses were performed with phreatic conditions at the maximum level measured in piezometers or during drilling. A summary of the safety factors is shown in Table 4. Stability analysis results are included in Appendix V.

Static Factor of Safety under the Long-Term Storage Pool Condition

The CCR regulations specify the factor of safety should meet or exceed 1.5 when the pool is at the maximum, long-term level (i.e., normal pool) and a steady state seepage condition has developed. GA selected two critical sections, designated as B-B and C-C, for the analyses. The sections and their locations are shown on the drawings in Appendix VI. GA determined the embankment material types and stratigraphy from the aforementioned drilling and laboratory testing performed by AEPSC.

Static Factor of Safety under the Maximum Surcharge Pool Condition

The CCR regulations specify the factor of safety should meet or exceed 1.4 when the pool is at the maximum surcharg pool condition. We performed the stability analyses with the pool at the peak level during the one-half PMP design storm event, discussed previously. As shown in Table 1, the peak level in either pond was elevation 585.5 feet. We used this level for the stability analyses of both B-B and C-C.

A summary of the safety factors, from the maximum surcharge stability analyses, is shown in Table 4. Stability analysis results are included in Appendix V.

CCR RULES ASSESSMENT AND CERTIFICATION JOHN AMOS POWER PLANT - BOTTOM ASH COMPLEX **DECEMBER 21, 2015** PAGE 7

Seismic Factor of Safety

The CCR regulations specify the factor of safety should meet or exceed 1.0 under seismic conditions. Furthermore, the recommended design earthquake event should have a 2% exceedance in 50 years (an approximate return period of 2,475 years). GA performed pseudostatic stability analyses on sections B-B and C-C with the elevation 583.5 normal pool level and steady state seepage conditions based on maximum, measured piezometric levels.

Based on the 2008 Interactive Deaggregations website, provided online through the USGS Geologic Hazards Science Center, the Amos Bottom Ash Complex facility has a peak ground acceleration of 0.065g for a seismic loading event with a mean return time of 2,475 years. Conservatively assuming soft soil ground conditions above rock, translates to a peak horizontal ground surface acceleration of approximately 0.15g. Using a commonly applied factor of 0.5 times the peak horizontal acceleration yields the conservative horizontal seismic coefficient of 0.075 that was applied in the slope stability analyses.

A summary of the pseudo-static safety factors is shown in Table 4. Stability analysis results are included in Appendix V.

Liquefaction Assessment

The CCR regulations specify the liquefaction factor of safety should meet or exceed 1.2. This requirement applies to facilities with embankment materials that have been determined to contain soils susceptible to liquefaction.

We used the Standard Penetration Testing (SPT) results from the exploratory drilling program and laboratory testing results to determine the embankment soils' susceptibility to liquefaction. We used methods from Mine Safety and Health Administration's *Engineering and Design* Manual for Coal Refuse Disposal Facilities (2010) to make the determination. First, the SPT blow counts were corrected to $N_{1,60}$ values for each soil layer and a median value was calculated. Calculation spreadsheets are included in Appendix V, and the median values for embankment materials are in shown in Table 3.

amos bac cer certification 12-21-15 wpd

Table 3. Corrected SPT Data and Soil Type

MSHA manual guidelines state a clay-like soil can be susceptible to liquefaction if the corrected SPT value is less than 6. As shown in Table 3, using these guidelines, the shale fill and clayey gravel should not be susceptible to liquefaction. Because the embankment materials are not susceptible to liquefaction, no additional analyses were performed for this assessment. Note that this assessment does not extend to foundation materials, below the embankment.

End-of-construction Factor of Safety

The CCR regulations specify the factor of safety should meet or exceed 1.3 for the end-ofconstruction loading condition. End of construction factors of safety are typically calculated for new construction. Given that the facility has been in service for more than 40 years and is considered to be in its long-term condition, no additional analyses were performed.

Summary of Results

A summary of results from the slope stability analyses is provided in Table 4. SLOPE/W computer output, showing the modeled profiles, loading conditions, and critical failure surfaces are provided in Appendix V. As shown in the slope stability analysis results in Table 4, the factors of safety satisfy the requirements set forth in the CCR Rules.

CCR RULES ASSESSMENT AND CERTIFICATION JOHN AMOS POWER PLANT - BOTTOM ASH COMPLEX **DECEMBER 21, 2015** PAGE 9

Table 4. Summary of Slope Stability Analyses Results

CERTIFICATION STATEMENT

Based on the site visit, the results of the field and laboratory testing of the materials used in the embankment construction, and our review of the as-built embankment geometry; it is our opinion that the Amos Plant Bottom Ash Complex has slope stability factors of safety that meet or exceed the requirements in the CCR Rules. Furthermore, based on our review of the as-built embankment geometry, current operating pool levels, and the spillway system; we believe that the facility is capable of storing/routing the runoff from one-half of the 6-hour PMP design storm event.

Accordingly, I hereby certify that the John Amos Plant – Bottom Ash Complex meets the applicable requirements in the CCR Rules. It should be clearly noted that this certification is not a legal guarantee. This certification is merely a statement by a registered professional engineer that, to the best of his knowledge, the facility meets the applicable requirements set forth in the CCR Rules. No warranties, expressed or implied, are provided.

Seth W. Frank, P.E. West Virginia R.P.E. No. 20574

Date

 $12 - 21 - 2015$

amos bac cer certification 12-21-15 wpd

Geologic Description

The Amos Power Plant is situated in Putnam County, West Virginia within the physiographic province of the Appalachian Plateau. The Amos Power Plant primary and ancillary facilities are located along the southern bank of the Kanawha River along S.R. 35 approximately two miles northwest of Interstate I-64 at Scary, WV. The plant facility and accompanying Bottom Ash Complex just to the west are situated on relatively level alluvium with surface drainage to towards the Kanawha River, located along the eastern and northern boundaries of the facility. The Kanawha flows westward into the Ohio River at Point Pleasant, West Virginia. Surface flow in the northwestern area of the site, where the Bottom Ash Complex is located, is northwestward towards Bill's Creek, a tributary of the Kanawha. The plant area is underlain by Quaternary age alluvium consisting of lenticular floodplain deposits of clay, silt and fine to coarse sand with some gravel lenses to a depth of about 50 feet (elevation of approximately 530) feet). Bedrock consists of Pennsylvanian age shale, coal, clay and very limited amounts of limestone. The Pennsylvanian deposits range from about 3,000 to 3,800 feet in thickness and are typically relatively horizontal to slightly folded.

In the upland areas of the Amos Power Plant property in the vicinity of the Fly Ash Reservoir and Quarrier Landfill, the hilltops are capped by nominal thickness of residual soils varying up to about six feet in occurrence underlain by low permeability Permian age Dunkard Formation strata. The Monongahela Formation underlies the hill slopes and valley bottoms and is, in turn, underlain by the Conemaugh Formation. The bedrock underlying the alluvial sediments in the power plant vicinity along the Kanawha River valley is the Pennsylvanian deposits of the Conemaugh Formation. Underlying the Pennsylvanian deposits are Mississippian aged sandstone and shale with minor amounts of limestone. Structurally the area is relatively quiescent with no faults having been identified within the study area of the Amos facility. Accordingly, there are no seismic impact zones within or near the plant area.

According to the 1968 geologic map of West Virginia produced by the Geologic and Economic Survey of West Virginia, there is no karst terrain underlying or within the site area.

There are no economically feasible coal deposits underlying the Amos facility either in the plant or upland areas to the south in the vicinity of the Fly Ash Reservoir. There are economic oil and gas deposits in Putnam County with wells having been installed on the Amos Plant property into the Berea Sandstone.

Groundwater in the plant area is near the pool level of the Kanawha River (about 566 feet) within the alluvial sediments underlying the facility while the upland areas are primarily stress relief fracture flow marked by secondary porosity resulting from fracturing. Groundwater flow in the upland areas tends to follow the stress relief fracture flow pattern that typically mimics surface topography while flow within the alluvium sediments underlying the plant is primarily towards the Kanawha River or Bill's Creek, as is the case with the western area of the plant site in the vicinity of the Bottom Ash Complex.

At the direction of AEP, eight borings were drilled through the main dike of the Bottom Ash

Complex in August 2005 by H.C. Nutting Company of Charleston, West Virginia. The boring locations are shown on the drawings in Appendix IX. Boring logs are included in Appendix II. Standard Penetration Tests (SPT) were performed generally on 5-foot intervals and relatively undisturbed samples were collected at selected locations using a thin walled sampler.

Below the fill materials, a 4 to 6-foot thick layer of soft clay and about a 20-foot thick layer of silty sand, both likely alluvial in origin, were encountered in each of the borings. Below the silty sand, residual weathered shale was encountered to the boring termination depths. The natural materials encountered in the borings are consistent with the general geology description included herein.

References:

GAI Consultants, Inc., (2004), FGD Landfill Siting Study, JE Amos Power Plant, West Virginia.

Ehlke, T.A., Runner, G.S. And Downs, S.C., 1982 Hydrology of Area 9, Eastern Coal Province, West Virginia Geological Survey Water-Resources Investigations Open-File Report 81-803.

White, I.C., and Krebs, C.E. (1911) West Virginia Geological Survey; Jackson, Mason and Putnam Counties, Wheeling, WV; Wheeling News Litho. Company.

White, I.C., and Krebs, C.E. and Tetts, D.D. (1914) West Virginia Geological Survey; Kanawha County Jackson, Wheeling News Litho. Company

B. M. Wilmouth, Movement of Ground Water in the Kanawha River Alluvium in West Virginia, (Abstract - Geology and Mining), Proceedings of the West Virginia Academy of Sciences, 1961, Volume 33.

B. M. Wilmouth, Hydrology of the Kanawha Valley, Proceedings of the West Virginia Academy of Sciences, 1968, Volume 40.

Geology and Economic Resources of the Ohio River Valley in West Virginia, West Virginia Geologic Survey, Volume XXII, 1956.

Appendix H

Fly Ash Pond Structural Stability and Safety Factor Assessments required at § 257.73(d) and (e)

INACTIVE CCR SURFACE IMPOUNDMENT

Design and Operating Criteria

CFR 257.71; 257.73; 257.74;257.82

Fly Ash Pond

John E. Amos Plant

April, 2018

Prepared for: Appalachian Power Company – John E. Amos Plant

1530 Winfield Rd,

Winfield, West Virginia 25213

Prepared by: American Electric Power Service Corporation

1 Riverside Plaza

Columbus, OH 43215

Document ID: GERS-18-012

INACTIVE CCR SURFACE IMPOUNDMENT Design and Operating Criteria **JOHN E. AMOS PLANT FLY ASH POND**

PREPARED BY

DATE

DATE

REVIEWED BY

APPROVED BY

DATE 9PR 4,2018 Garv

Manager - AEP Geotechnical Engineering

2018

I certify to the best of my knowledge, information and belief that the information contained in this summary meets the requirements of 40 CFR 257.71; 257.73; 257.74 and 257.82

Attachment: Closure Design Report (report text only)

1.0 OBJECTIVE

This report was prepared by AEP- Geotechnical Engineering Services (GES) section to fulfill requirements of CFR 257 Subpart D for Inactive CCR Surface Impoundments.

2.0 NAME AND DESCRIPTION OF INACTIVE CCR SURFACE IMPOUNDMENT

The John E. Amos Power Plant is located near Winfield, Putnam County, West Virginia. It is owned and operated by Appalachian Power Company (APCO). The facility owns an inactive CCR surface impoundment that was used for permanent disposal of fly ash, referenced as the John Amos Fly Ash Pond (FAP).

The Fly Ash Pond dam is a cross valley dam on Scary Creek, a tributary to the Kanawha River. The dam is 220 feet high and has side slopes of 2.5 to 3H:1V on the upstream slope, and 2.0 to 2.5H:1V on the downstream slope.

The dam is classified as a High Hazard Dam and is an unlined surface impoundment.

An operation of the CCR unit ceased in 2010 in accordance with the State requirements, and therefore was not operating as of October 14, 2015. The closure of the CCR unit started in 2011 with a site investigation and engineering report. The closure report was filed with applications to the State of West Virginia Department of Environmental Protection to close the fly ash pond.

Approval was obtained and construction activities started in September 2013. The construction was completed in the Fall of 2017. The closure of the CCR Unit was closure in place with a CCR compliant cap system, consisting of a geomembrane and two-feet thick cover soil and vegetation.

The closure report referenced above addressed all items related to Structural Integrity as per CFR 257.73, CFR 257.74 and CFR 257.82. As part of the closure design, a new discharge channel was constructed such that the dam no longer impounds any stormwater runoff from the watershed. The channel was designed to pass the peak discharge of the PMF design storm.

The text portion of the design report for the closure is in the attachment.

The facility is now in Post Closure Care period of 30 years.

ATTACHMENT

DESIGN BASIS REPORT

John E. Amos Plant Fly Ash Pond Closure Appalachian Power Company Putnam County, West Virginia

October 26, 2012

A.

 $\left($

John E. Amos Plant Appalachian Power Company Scary, West Virginia

October 25, 2012

Volume 1 of 2

Stantec Consulting Services Inc. 11687 Lebanon Road Cincinnati OH 45241-2012 Tel: (513) 842-8200 Fax: (513) 842-8250

October 26, 2012

Mr. John Massey-Norton **American Electric Power** 1 Riverside Plaza, 22nd Floor Columbus, Ohio 43215

Design Basis Report **Reference: Fly Ash Pond Closure** John E. Amos Plant **Putnam County, West Virginia**

Dear Mr. Massey-Norton:

Stantec Consulting Services Inc. has prepared the attached Design Basis Report and Permit Drawings for the Fly Ash Pond Closure at the John E. Amos Plant. The documents were prepared in support of the application for a West Virginia Dam Modification Permit Certificate of Approval.

We appreciate the opportunity to assist the AEP team on this project. Please call if you have any questions or if we can be of further assistance.

Sincerely,

STANTEC CONSULTING SERVICES INC.

20 May

John R. Menninger, PE **Senior Project Engineer** Tel: (513) 842-8200 Fax: (513) 842-8250 john.menninger@stantec.com

Uffrey S. Dingeards (58H)

Jeffrey S. Dingrando, PE, PG **Geotechnical Engineer** Tel: (859) 422-3049 Fax: (859) 422-3100 jeff.dingrando@stantec.com

/lfb

Table of Contents

Appendices

Appendix A Dam Safety Documentation

- A-1 AEPSC (2008b) Monitoring and Emergency Action Plan and Maintenance Plan
- A-2 AEPSC (1993) Dam Break Analysis
- Appendix B Construction Documentation
	-
	- B-1 Work Plan
B-2 Constructic **Construction Estimate**
	- B-3 Construction Specifications

Appendix C Stormwater Management

- C-1 Hydrologic Parameters
- C-2 Stage-Storage Curves
- C-3 Rating Curves
- C-4 Hydrologic Model Results
- C-5 Channel Design

Appendix D Supporting Geotechnical Reports

- D-1 Stantec (2012d) Geotechnical Data Report (Revision 2)
- D-2 Stantec (2012e) Revised Supplemental Geotechnical Data Report

Appendix E Geotechnical Analyses

- E-1 Settlement
- E-2 Global Stability
- E-3 Veneer Stability
- E-4 Dredge Dike Stability
- E-5 Liquefaction Potential

1.0 Introduction

1.1 BACKGROUND

The John E. Amos power plant is located between Old US Route 35 (Winfield Road) and the Kanawha River in Putnam County, West Virginia. It is owned and operated by Appalachian Power Company, a subsidiary of American Electric Power (AEP). The plant consists of three coal-fired electric generating units and has been in operation since the early 1970's. Units 1 and 2 have a rated capacity of 816.3 MW each, and Unit 3 has a rated capacity of 1300 MW. Plant coal combustion residual (CCR) byproducts consist of fly ash, bottom ash and synthetic gypsum.

The fly ash pond complex was constructed and operated as a wet disposal facility for sluiced fly ash; however, it is no longer in use for CCR disposal. Currently gypsum is dewatered and dry landfilled at the newly constructed gypsum landfill. Bottom ash is managed at the ash pond located at the plant. Fly ash is dry landfilled at the older Quarrier site.

The fly ash pond complex is located approximately 1.5 miles southwest of the plant, north of Interstate-64 in the headwaters of Little Scary Creek (a tributary of the Kanawha River). The approximate surface area of the impoundment is 166 acres at normal pool (El. 860 feet). The current height of the dam as measured from the downstream toe is approximately 220 feet. The dam was originally constructed in the 1970's and subsequently raised via conventional downstream construction methodology in three stages: Stage 1 with crest elevation of 810 feet, Stage 2 with crest elevation of 845 feet, and Stage 3 with crest elevation of 875 feet. The dam was constructed as a zoned embankment with an inclined upstream impervious zone and downstream zones of earth and rockfill. Figure 1 shows the location of the fly ash dam in relation to roadways, streams and the nearest town.

The current crest of the dam at elevation 875 feet is approximately 30 feet wide and 2,000 feet long. The upstream slope of the dam ranges from roughly 2.5 to 3 horizontal to 1 vertical (H:V) and downstream slope ranges from 2 to 2.5:1 (H:V). The visible portion of the upstream slope is vegetated, while the downstream slope consists of large riprap.

The fly ash pond complex has a concrete principal spillway decant riser structure and discharge piping located in original ground off the northwest end of the dam. The decant piping corridor discharges through a tunnel in the hillside into an adjacent Little Scary Creek tributary. The dam also has an open channel emergency spillway excavated through bedrock along the northwest hillside.

The principal spillway riser is currently not used to control pool elevation. A reclaim water pump system was installed in 2010 to convey flows from the ash pond to the bottom ash pond at the plant.

Figure 1. Location Map

1.2 PROJECT DESCRIPTION

The Amos Fly Ash Pond Closure project will eliminate the permanent pool through the regrading of the in-situ fly ash within the impoundment and excavation of a new outlet channel to the west of the facility. The re-graded ash will be overlain by a soil cover to prevent direct contact between stormwater runoff and CCRs.

1.3 DAM SAFETY CLASSIFICATION

The Amos Fly Ash Pond Dam is classified as a Class I structure per West Virginia Dam Safety Regulations. The previously developed Monitoring and Emergency Action Plan and Maintenance Plan revised January 24, 2008 by AEP are included in Appendix A-1. The Emergency Action Plan utilized results of a dam break analysis prepared by AEP in 1993. A copy of the dam break analysis is also provided in Appendix A-2. No updates to the plans or dam break analysis are proposed at this time. During closure operations, the normal pool and volume of sluiced ash / water impounded will not exceed the previous modeled conditions and will reduce potential breach consequences.

1.4 PURPOSE AND SCOPE OF REPORT

This engineering report is provided in support of the West Virginia Dam Safety permit modification application for the Amos Fly Ash Pond Closure project. The report presents the proposed design and supporting engineering analyses. Section 2.0 outlines the proposed construction elements, sequencing, costs and specifications. Section 3.0 discusses the analysis and design of stormwater management features including reservoir pool routings and channel design. Finally, Section 4.0 includes the review of the geotechnical design analyses performed including settlement, slope stability and liquefaction potential.

2.0 Site Development and Construction

2.1 PRIMARY DESIGN ELEMENTS

The Amos Fly Ash Pond Closure Permit Drawings provided with the application present the proposed closure design. The design is comprised of multiple key elements outlined below and detailed further in the project work plan and construction specifications.

2.1.1 Mass Grading

The proposed closure design includes the re-grading of in-situ fly ash within the fly ash pond impoundment to facilitate drainage across the site and eliminate a permanent pool. Initial grading will be performed through excavation of fly ash in the central and western portions of the pond and placement in the eastern areas of the pond. The grading is anticipated to occur via one or a combination of the following methods: 1) hydraulic dredging of fly ash and placement in upstream dredge containment areas and/or 2) conventional excavation and fill placement utilizing low ground pressure construction equipment. Proposed grading plans for the final grade and interim phasing are presented in Drawings 13-30705 to 30714.

A typical dredge containment dike detail is presented in Drawing 13-30727. The typical dike design includes a homogenous soil embankment with a compatible chimney filter and drainage blanket. The upstream and downstream slopes are protected from erosion with a soil/rock cover. The pool elevation will be controlled by a fixed trapezoidal spillway with an invert two feet below the dam crest.

Dredge containment dike heights will vary based on their location and the proposed final grades. The dikes will be restricted to a maximum height of 24 feet and the open impounded volume less than 50-acre feet. Dredge containment areas may not be operated in series. Once a cell is filled to capacity, the free water shall be drained and final grade established prior to construction of the next downstream cell.

As an alternative to dredging, the contractor may elect to utilize conventional grading methods based on either ease of construction or economic factors. Areas not filled via hydraulic dredging shall be constructed with fly ash or soil / rock borrow from designated borrow sites within the impoundment watershed.

For purposes of the construction work plan and cost opinion, it is currently assumed that the majority of grading in the eastern and central portions of the pond identified in the Phase 1 drawings will be constructed with hydraulic dredging. The remaining grading operations in the western areas will completed via conventional methods.

2.1.2 Borrow Sites

Soil and rock borrow for use in the pond closure will be sourced from one of four borrow sites located adjacent to the pond. The borrow sites are identified on Drawings 13-30714 to 30720. Maximum extents for the borrow sites are identified on the drawings. Borrow materials are anticipated to include clay overburden soils and bedrock including claystone, shales, siltstone and sandstone. Additional information regarding the composition and uses of borrow material is provided in Section 4.1, Borrow Area Analysis.

2.1.3 Soil Cover

Soil cover will be placed atop the ash subgrade surface to protect the placed fill from erosion. The soil will be sourced from the adjacent borrow areas. Cover soils will be sloped from 2-10 percent. The top six inches will be suitable to sustain vegetation.

2.1.4 Interim Stormwater Management

The existing water reclaim system consists of the pump station located adjacent to the emergency spillway and twin eight-inch HDPE reclaim water lines that run along the crest of the dam and along a floating roadway east toward the plant. Stormwater that falls within the pond watershed is stored in the pond and pumped via the reclaim system to the plant. During construction, the reclaim system will be utilized to manage construction runoff and ash contact water.

Modifications to the system will be required as the proposed grading will impact the existing discharge pipes and require water levels in the pond lower than the allowable operating range of the existing pump system estimated as elevation 850 feet. The new reclaim water lines will be constructed outside of the proposed excavation limits. Details for the water lines are provided on Drawing 13-30707.

Additionally, the contractor will modify the existing pump intake lines to accommodate attachment of a secondary pumping system. The secondary system will pump water through two temporary units at the current pump station capacity (675 gpm) each from elevations below 850 feet to the existing pump station. The existing station will then pump flows back to the plant.

2.1.5 Drainage Channel Network

Following establishment of final grades, stormwater runoff from the soil cover and surrounding hillsides will be conveyed across the final surface, via a network of drainage channels, through a newly excavated spillway adjacent to the existing emergency spillway and into a tributary of Little Scary Creek. Channel details are shown on Drawing 13-30728. Details on the design of each channel are provided in Section 3.4.

2.2 CONSTRUCTION SEQUENCING

The proposed construction sequencing was developed to review constructability concerns and allow for review of potential interim conditions. The actual construction sequencing of the proposed closure may differ from that displayed on Drawings 13-30708 to 30713 and will be determined by the selected contractor.

The construction phases presented are described below. A more detailed outline of the construction sequencing is provided in Appendix B-1.

- Phase 1 Initial Mass Grading: In-situ ash will be hydraulically dredged and placed in upstream dredge containment areas. The operating pool of the ash pond will be maintained at an approximate elevation of 860 feet to allow for dredge equipment access to the excavation areas. The dredge containment dikes would maintain a permanent pool to allow for solids to settle and decanted water to flow back to the larger impoundment. The containment areas would be constructed from upstream to downstream and dewatered as necessary. Constructed dredge containment dikes will maintain storage capacity and dike height metrics below dam classification thresholds.
- Phase 2 Close Dredge Containment Areas and Grade Dredged Areas: At the conclusion of dredging operations, the pool level will be drawn down and the dredge containment areas will be constructed to final grade, covered, mulched and seeded. Areas within the pond that were dredged will be graded to prepare for final cap and the pond water level will be lowered by the contractor using the existing reclaim water pump system and the secondary pumping system.
- Phase 3 Continue Closure: During Phase 3, the prepared subgrade in Phase 2 will be covered, mulched and seeded. Additional subgrade development will occur with stormwater being directed to a smaller pool in the northwest corner of the pond.
- Phase 4 Completion of Diversion Network: Phase 4 will include the cover, mulch and seeding of the Phase 3 area and completion of the diversion network. This will include construction of the proposed spillway rock cut and connection to the receiving tributary. Stormwater will continue to be maintained in the northwest pool.
- Phase 5 Final Closure Operations: During Phase 5, the majority of stormwater runoff within the pond watershed will be diverted through the proposed spillway following establishment of vegetation of the Phase 4 final cover. A small water quality basin will remain to provide for erosion control and contact water containment of the area not yet completed. The remaining pond will be filled in and closed from the perimeter working towards the pond. Finally, once vegetation has been established, the small remaining pond will be closed and all runoff directed to the diversion channel. At this time, the existing principal spillway will be abandoned.

2.3 OPINION OF PROBABLE CONSTRUCTION COSTS

A construction cost opinion has been developed as part of the permit design package. The total construction costs are estimated at \$26,819,000. A detailed breakdown of the construction cost opinion is provided in Appendix B-2.

2.4 CONSTRUCTION SPECIFICATIONS

Specifications have been developed for the construction of the proposed improvements. The specifications include the following:

- CE-002 Specification for Clearing and Grubbing
- CE-003 Specification for Stripping
- CE-004 Specification for Excavation
- CE-004A Specification for Rock Blasting
- CE-005 Specification for Foundation Preparation
- CE-006 Specification for Fill
- CE-006A Earthwork (Backfill) Testing
- CE-007 Specification for Erosion and Sediment Control
- CE-008 Specification for Surface Drainage Systems
- CE-009 Specification for Roads and Parking Areas
- CE-009A Specification for Road Mix Fly Ash-Aggregate Base Course
- CE-013 Specification for Geotextile
- CE-013A Nonwoven Geotextile
- CE-017 Specification for Hydraulic Dredging
- CE-022 Specification for Surface Settlement Monuments and Settlement Gages
- CE-025 Specification for Pressure Relief, Horizontal, and French Drains
- CE-033 Specification for Loading, Excavating, Hauling, Placing, and Compacting of Coal Combustion By-Products
- CE-036 Demolition Removals and Alterations
- CE-037 Excavation and Backfill for Underground Utilities
- CE-040 Materials for Underground Piping and Sewers

These are included in Appendix B-3.

3.0 Stormwater Management

Stantec performed stormwater calculations to evaluate the hydrologic and hydraulic performance of the drainage facilities for the proposed closure design. This analysis included routing of storm runoff through the impoundment for existing, interim and closed conditions. In addition, peak flow rates were estimated for the closed condition to develop the stormwater conveyance and diversion structure designs.

Current pond operations maintain a normal pool elevation of approximately 860 feet utilizing the reclaim water pump system with a total rated capacity of 1350 gallons per minute (3 cubic feet per second). The pump system was designed to prevent the discharge of water through the primary decant structure (current discharge elevation 867 feet) for storm events equal to or less than back-to-back 25-year, 24-hour storms. These storm inflows are stored in the pond and pumped back to the bottom ash pond at the plant.

As outlined in Section 2.0, the ash pond will be closed through the progressive phasing of excavation and fill within the impoundment. Throughout construction, the existing operation guidelines will be maintained. Contact water (i.e. rainfall that falls on or passes over exposed ash) will be stored within the pond footprint and pumped back to the bottom ash pond for storm events equal to or less than back-to-back 25-year, 24-hour events. In addition, the proposed interim grading and pond elevations will provide sufficient storage and spillway capacity to pass the Probable Maximum Precipitation (PMP) event without overtopping the dam crest.

Final closure conditions will result in elimination of the permanent pool and a direct connection to a downstream tributary of Little Scary Creek through a deepening of the existing emergency spillway cut. The primary decant structure will be abandoned and new drainage channels constructed atop the closed pond surface. The proposed drainage channels are designed to convey the 100-year, 6-hour storm event.

3.1 HYDROLOGY

Stantec computed runoff hydrographs for the drainage area of the impoundment using the U.S. Army Corps of Engineers (USACE) Hydrologic Modeling System (HEC-HMS) Version 3.4 (USACE, 2010). Twelve design subbasins were delineated based on topographic information provided by AEP and the proposed closure geometry. The base mapping was derived from AEP aerial and hydrographic surveys dated early 1996, March 29, 2002, April 5, 2005 and September 8, 2010. Topographic data was formatted into 2-foot contours referenced to the North American Vertical Datum of 1988. Figure C-1 in Appendix C.1 displays the subbasin delineations and key drainage features.

Hydrologic calculations were performed using the methodology outlined in the U.S. Department of Agriculture (USDA) Technical Release 55: Urban Hydrology for Small Watersheds (TR-55) (USDA, 1986). Design storm rainfall depths were determined using the National Oceanic and

Atmospheric Administration (NOAA) Atlas 14: Point Precipitation Frequency Estimates (NOAA, 2011) and Hydrometeorological Report No. 51 (NOAA, 1978). Design storm information is summarized in Table 1. The SCS Type B six hour rainfall hyetograph was utilized for each 6 hour event (Chow, 1988), and a modified SCS Type II hyetograph was utilized for the back-toback 24-hour events.

Stantec analyzed the performance of the pond and drainage network for the existing, interim and closed conditions. Subbasin runoff properties, including curve numbers and lag times, were calculated for each of the modeled scenarios using TR-55 methodology. Appendix C.1 includes a summary of the hydrologic parameters for each model scenario.

3.2 RESERVOIR POOL ROUTING

The existing fly ash pond complex must continue to meet dam safety regulations outlined in the State of West Virginia's "Title 47, Legislative Rule, Department of Environmental Protection, Water Resources Series 34, Dam Safety Rule" (State of West Virginia, 2009) throughout pond closure construction. As a high hazard facility, the pond must maintain the capacity to store and pass the 6-hour PMP event without overtopping the dam crest. To assess the impacts of the proposed closure design on the reservoir performance during a PMP event, Stantec analyzed each interim phase of construction and the final proposed closure geometry.

3.2.1 Stage – Storage – Discharge Relationships

A unique stage storage curve was developed for each modeled scenario using existing aerial and hydrographic survey data and proposed grading plans. Figures C.2 and C.3 in Appendix C.2 show the estimated stage storage curves for each of these scenarios.

Additionally, two separate rating curves were developed for the analysis. Rating Curve # 1 represents the existing pond operations including the principal spillway set at El. 867 feet and the emergency spillway at El. 868 feet. Rating Curve #2 represents the final spillway configuration with the proposed channel cut through the ridge on the west side of the pond. Due to the varied geometry and slope of the spillway cut, a HEC-RAS model was developed to calculate water surface elevations at multiple locations for a range of flow rates. Figures C.4 and C.5 in Appendix C.3 provide a graphical representation of Rating Curves 1 and 2, respectively.

3.2.2 Design Storm Routing Results

The results of the analysis are presented in Table 2. Additional model results output is provided in Appendix C.4.

Table 2. PMP Reservoir Routing Results

Based on the results of the analyses, none of the existing or proposed conditions will result in pool elevations greater than the top of the existing primary spillway (El. 867'), emergency spillway (El. 868') or within 9 feet of the dam crest (El. 875'). The highest pool elevation would occur during the initial stages of Phase 2 when fill has been placed in the eastern sections of the pond and the pool is still raised for dredging operations. Subsequent phases lower the normal pool elevation and result in additional storage capacity and freeboard.

Following completion of construction, the permanent pool will be eliminated; however, during extreme events, such as the PMP, water may pond on the graded surface for less than 24 hours.

3.3 CONTACT WATER CONTAINMENT

In addition to the PMP reservoir pool routings, Stantec also reviewed the performance of the proposed contact water containment ponds during Phases 3, 4 and 5 of construction. During these phases, excavation of some or all of the Borrow Site 3 / Spillway Cut will occur. With excavation of this area, a potential release of contact water could occur without proper containment procedures.

Using the results of the HEC-HMS rainfall-runoff analysis, Stantec performed pool routings for each phase to determine the required containment elevation for back-to-back 25-year, 24-hour storm events. The results of the routings, as well as the containment elevations specified on the drawings, are provided in Table 3 below.

During back-to-back 25-year events, containment elevations provide at least 0.8 feet of freeboard above the calculated maximum pool elevations.

3.4 CHANNEL DESIGN

Each of the proposed permanent drainage channels was designed to convey the 100-year 6 hour storm event, which meets the West Virginia Dam Safety Regulations for diversion channels and exceeds the requirements for supplemental drainage features. The permit modification drawings include details for three channel configurations. Each of the configurations is a twostaged channel with a small "bankfull" channel and a broader shallow floodplain.

The channel geometries were designed to contain a 2-year storm event within the "bankfull" channel and a 100-year storm event within the floodplain area. Table 4 below, provides a list of peak flow rates at key locations developed from the HEC-HMS rainfall-runoff analysis. The location of each studied discharge point is shown on Figure C.1 in Appendix C.1.

	Peak Flows (cfs)		
Discharge Point	2-Year	100-Year	
	93	478	
R	91	456	
	86	432	
		43	
F		40	
		4^{\prime}	
G			
	О		
	15	82	

Table 4. Drainage Channel Peak Flow Rates

The required channel depth and erosion protection were determined based on methods outlined in the West Virginia Division of Highways Drainage Manual (WVDOT, 2007). Normal depth for each channel was calculated based on Manning's equation. The maximum anticipated shear

Stantec DESIGN BASIS REPORT

stress was calculated using Tractive Force Theory. Example calculations and channel design results are provided in Appendix C.5.
4.0 Geotechnical Design

4.1 BORROW AREA ANALYSIS

Construction of the final closure system will require significant quantities of soil that is suitable for supporting vegetation. In addition, significant borrow material will be needed to adjust grades within the pond footprint prior to placing the final cover. Stantec's geotechnical exploration, performed in February and March of 2012, focused on potential borrow areas within the ash pond watershed, as well as within the vicinity of the proposed spillway cut.

Four areas were identified as potential borrow sites during the exploration and are shown in planview and profile on the permit modification drawings. Borrow Sites 1, 2 and 4 are located around the eastern perimeter of the ash pond, and Borrow Site 3 is located on north side of the existing emergency spillway cut. Both soil and rock excavation is expected within these areas, with rock excavation being performed using mechanical excavation and/or blasting. Certain weaker rock strata can be broken down into clay-like materials as needed.

These borrow sites will provide material for three primary needs:

- Soil Cover final cover
- Durable Rock Fill channel lining, slope protection stone, etc.
- Bulk Fill subgrade fill (in areas where dredged fly ash is not used), other areas where random fill is suitable.

Although dredged fly ash will be used extensively as subgrade fill, it is not discussed further herein because it is not being imported from outside the pond footprint.

In conjunction with the geotechnical exploration performed by Stantec, several historical references were used to define the subsurface stratigraphy for each site. These sources were also used to determine the available materials and quantities. The references included Acres American Incorporated (1974, 1975a, 1975b) reports for the main dam construction and expansion (including quarries that were to provide soil and rock borrow), along with the H. C. Nutting (2008) geotechnical report and AEP (1995) boring and monitoring well logs. Geotechnical reports provided by Stantec to support this design project are included in Appendix D. This includes Stantec (2012d) and Stantec (2012e).

Conceptual cut slope designs were developed for each borrow site, and can be found in the permit drawings. With the exception of Borrow Site 3, the slopes shown represent the steepest allowable slopes and the greatest lateral extent of development. The contractor may choose the degree of development for each borrow site based on their preferred approach. The lateral extent of the excavation is constrained by a minimum setback distance from gas lines located

around the facility perimeter. Currently, the setback distance (100 feet) shown herein has been assumed. The actual minimum distance will be determined during preparation of final construction drawings, in coordination with AEP and the gas utilities.

The development of Borrow Site 3 is also needed for the new spillway cut. On the south side of the new drainage channel, the geometry shown on the design drawings represents the required cut. On the north side, the minimum cut is shown but the contractor may propose to expand this cut farther to the north to generate additional borrow.

4.1.1 Material Needs

Based on the proposed grading, the required borrow quantities are estimated as follows:

- Soil Cover = $541,000$ cubic yards
- Durable Rock Fill = small quantity in comparison to available (Section 4.1.2)
- \bullet Bulk Fill = 432,000 cubic yards

Quantities are presented in terms of "in-place, after-compaction" volumes. No adjustment or assumptions have been made regarding the volume of borrow material that would be required to produce these in-place, after-compaction volumes.

4.1.2 Available Materials

Based upon Stantec's exploration and the historical data, the materials available onsite consist of clayey overburden soil, durable and nondurable sandstone, siltstone, shale, and claystone. Using the designed cut slopes shown on the drawings, volume calculations were performed using AutoCAD Civil3D 2009, and the available in-situ quantities of each material are presented in Table 5. The quantities provided are estimates based upon the limited subsurface data from Stantec's test pits and the available historical exploration data. Subsurface conditions between borings and test pits are unknown.

Table 5. Estimated Borrow Site Materials

The durable rock fill could consist of the relatively hard sandstone and siltstone encountered in the area. Bulk fill could consist of nondurable sandstone, siltstone, and shale, along with overburden soil unsuitable for the final cover and liner. Coal, if encountered during excavation, should be separated from the borrow material and not be used as fill for this site. The soil cover should consist of clayey overburden material, similar to that encountered during the test pit exploration conducted by Stantec.

Weaker claystone and clay shale strata could be processed until suitable for use as clay for the final cover and liner. Processing may include mechanically breaking down the rock and wetting the rock to accelerate the slaking process, until the material becomes soil-like and suitable for placement and compaction. This process has been successfully utilized at the Amos Plant in the past to construct the impervious zone of the fly ash dam, and is currently ongoing to generate clay material for construction of the Amos Flue Gas Desulfurization (FGD) landfill.

The level of effort necessary to excavate the borrow sites (e.g., mechanical excavation versus blasting) has not been quantified and is beyond the current scope of study. Similarly, the level of effort necessary to process certain rock strata into soil-like materials is beyond the current scope of study. Prospective contractors should evaluate these issues during the bidding process for this project. The rock excavation is discussed in more detail in Section 4.3.4.2, Rock Excavation, and in the specifications (Appendix B-3).

4.2 SETTLEMENT ANALYSIS

Consolidation analyses were performed to evaluate the total anticipated vertical settlement of the final cap. Total settlement is a function of the thickness and stress history of underlying ash and soil, additional load imposed by closure construction (new sluiced ash and final cap), and the assumed time period over which the new load is imposed. Multiple points along several profiles were evaluated and then compared in order to consider planned overbuild and potential areas of differential settlement. A plan view showing the selected alignments can be found in Appendix E-1.

The closure geometry and sequence is such that the most significant settlement will occur within the existing sluiced ash, due to the placement of new sluiced ash in the upstream portions of the pond footprint. Another area of larger settlements is near the existing principal spillway riser, where the pond is still deep and will require a large amount of fill during closure. The rate of consolidation has been considered herein to evaluate whether a waiting period can be incorporated to allow some percentage of this settlement to occur prior to construction of the final cap. After establishing a reasonable waiting period, the total anticipated settlement is then calculated. The grading design was then modified (i.e., overbuilt) to compensate for settlements, such that post-closure grades were within acceptable bounds.

4.2.1 Methodology and Assumptions

The settlement magnitude was calculated along the main project baseline at approximate 100 foot spacing and at 200- to 300-foot spacing along selected secondary alignments. A plan view showing the alignments is included in Appendix E-1. At each selected station, two components of settlement were estimated:

- Settlement due to Grading: caused by placement of fill (dredged ash or bulk fill) to achieve the subgrade elevation.
- Settlement due to Cap: caused by placement of the final soil cover to achieve final grade.

Settlement due to grading (dredge and fill) and due to cap (final soil cover) were calculated separately. The soil profile at each station was divided into separate horizons, consisting of residual soil, sluiced fly ash, dredged fly ash, and the final soil cover. Each soil horizon was assumed to be homogeneous, using the soil properties in Appendix E-1 estimated from the lab and field testing performed during the geotechnical exploration.

Several assumptions were made to simplify the analysis:

- All settlement is due to primary consolidation, which can be modeled assuming a onedimensional soil profile.
- Existing sluiced ash is normally consolidated.
- Based upon the exploration findings, the sluiced fly ash and residual soil were assumed to be saturated. Further, the additional dredged fly ash is assumed to be saturated at the time of final cover placement.
- After dredging portions of the pond footprint, sufficient time passes to allow complete rebound of the existing sluiced ash prior to placing the cap. Therefore, the ash in the dredge area will be over consolidated at the beginning of cap placement.
- Post-construction settlement within the final cover is assumed to be negligible.

4.2.2 Time Rate of Consolidation

In order to determine the total settlement magnitude at each station, it was assumed that the final soil cover would not be placed until 30 days after completion of ash grading. This is judged to be a reasonable assumption, given that the ash grading will take place over an extended period of time and that the conversion from dredging to final cover construction cannot occur instantaneously. In reality, consolidation due to placement of dredged fly ash will occur continuously as material is placed, not instantaneously as is assumed.

Using the pore pressure dissipation tests performed as part of the CPT exploration on the site, estimated time to 50% consolidation (t_{50}) values were calculated. As shown in the calculations in Appendix E-1, using lab data and published correlations, a coefficient of consolidation (c_v)

value was calculated for the fly ash. A c_v value was also estimated for the residual soil based upon lab test results and published correlations for clayey soil. These values were used to estimate the percent of consolidation that will occur in the first 30 days. Any settlement occurring after those 30 days was added to the settlement caused by the final soil cover to determine the total settlement magnitude at each station. This 30-day waiting period reduced the settlement magnitude due to fly ash grading by 40 to 90 percent, thus reducing the total settlement by as much as 0.3 feet within the pond footprint.

4.2.3 Settlement Magnitude and Differential Settlement

The general settlement profile for the baseline consists of a relatively large amount of settlement near the spillway, peaking at Station 111+50 with a magnitude of 0.52 feet, and decreasing to as low as 0.02 feet near Station 120+54. The region of higher settlement is where the pond is currently deep and requires significant filling, while the region of lower settlement corresponds to an area of dredging where the only settlement is due to placement of the 2-foot thick cover.

Towards the eastern (upper) end of the baseline, the calculated settlement increases again due to the amount of dredged ash fill. The maximum settlement calculated in this area is approximately 0.48 feet near Station 148+54. It was anticipated that the buried quarry bench (Stations 120+00 to 122+00 along the baseline) within the footprint of the pond would create substantial differential settlement. However, because of favorable grading in this region, the quarry bench is now almost completely in the dredging area and is not a major concern for differential settlement.

The settlement values calculated for the secondary alignments were found to be less than the maximum values along the main project baseline alignment. Shown below, and in Appendix E-1, is a plot of the settlement profile along the project baseline, assuming a 30-day wait period before placing the final soil cover.

Figure 2. Settlement Profile along Main Project Baseline

As shown in the above graph, the area with zero settlement due to grading is the dredged area of the pond. The areas of high settlement are caused by a combination of relatively large amounts of fill and thick layers of existing sluiced ash. The maximum settlement locations do not necessarily coincide with the locations of maximum fill because the thickness of the compressible layers decreases as the fill increases near the upper end of the project baseline.

4.2.4 Overbuild Design

As incorporated in the permit drawings, an overbuild amount was determined for the site based upon the settlement analysis. By comparing the station-to-station differential settlement and calculating the segment slopes for each station, it was determined that there were two areas that had undesirable post-settlement slopes caused by differential settlement. The first area is near the proposed spillway, and the second is near the transition from subgrade cut to fill near the middle of the ash pond. In order to counteract the differential settlement, an overbuild amount was added to the ash fill quantity that increased the post-settlement segment slopes to an acceptable value (1% \pm approximately 0.1%). Beginning at the spillway, ash fill 0.2 feet thick was added and carried along the alignment until Station 139+54, after which an additional 0.4 feet of ash fill was added.

The secondary alignments did not show significant differential settlement, thus they did not require additional overbuild beyond that necessary to match up at the confluence with the overbuilt primary alignment.

4.3 POST-CLOSURE STABILITY

Stability analyses were performed at several locations of the impoundment to determine the stability of the closure design. Several scenarios were analyzed for the various cross-sections, including short-term, long-term, and seismic stability.

4.3.1 Design Criteria and Methodology

Consistent with engineering practice and governing dam safety regulations (State of West Virginia, 2009), the target factors of safety for short-term (i.e., during construction and end of construction) slope stability are as follows:

The following factors of safety against static slope stability will be maintained in the long term, following project completion:

• Post-Earthquake Static Stability ($FS_{POST-FO}$) $FS_{POST-FO} \ge 1.0$

The material properties used in the analyses were derived from lab and field testing performed during the geotechnical exploration, historical data from the site, and correlated values with published data when necessary. Refer to summary tables in Appendix E-2 for material properties.

The strength values for the residual soil were based upon strength values given in Acres American Incorporated (1974) dam raising report and other historical information for the clay in the area. For the final soil cover, a similar value was used based upon the type of soil recovered during the excavation of the test pits. The material consisted of stiff to very stiff sandy clay and clayey sand.

As described in Stantec (2012d), several triaxial tests were performed on the sluiced fly ash. From the consolidated-undrained (CU) tests, it was shown that, under the range of pressures that the samples were tested, the material has higher undrained strength than drained strength, which can only occur if negative pore pressures are generated and lead to additional strength via suction pressures. Typically, sluiced ash is assumed to be deposited in such a loose state that it will contract upon shearing, even at low confining pressures. However, most of the CU triaxial test results show that the sluiced ash demonstrates classic dilative behavior, illustrated by the shape of the stress path and the pore pressure response. The pore pressure response is particularly indicative of dilation during shear, in which negative pore pressures are generated as the sample attempts to expand.

Stress-strain behavior is also generally dilative, indicated by a lack of significant post-peak drop in strength. However, as confining pressures increase, the behavior of this same material should change to contractive. In a small number of tests at the highest confining pressures (representative of the ash near the bottom of the deepest portions of the pond), this transition can be seen in terms of slightly positive pore pressures during shearing.

During design, the increase in undrained shear strength due to negative pore pressures is often neglected, because such suction pressures cannot be sustained. This may be particularly true for the relatively pervious sluiced ash, which will dissipate excess pore pressures rather quickly during and after shearing. In such cases, it is common to assume that the lower drained strength will control design during otherwise undrained loading scenarios. Because of this, the material exhibits higher undrained strengths than drained strengths. Therefore, the drained friction angle was used in the analyses for both short and long-term stability.

A copy of Stantec (2012d) is included in Appendix D-1.

4.3.2 Dam Stability

The existing fly ash deposits along the upstream face of the dam will be regraded and capped for closure. In general, a modest amount of additional fill (sluiced ash and cover materials) will be placed against the dam near the left (south) abutment, while existing fill (sluiced ash) will be removed moving towards the right (north) abutment. The removed thickness will increase moving towards the right abutment in the direction of the new spillway cut. The most significant change to the loading on the dam might be the removal of the permanent pool from the upstream side and the resulting decrease in pore water pressures in the embankment.

Based on previous reports and the known regulatory requirements, the existing dam is assumed to meet all necessary stability criteria for short-term and long-term load scenarios for the range of conditions that existed during construction and operation of the fly ash pond. To demonstrate (graphically) how the closure geometry interacts with that of the dam and to show that stability criteria are met for long-term conditions, two cross sections were evaluated using drained strength parameters and steady-state (post-closure) conditions. Two ash elevations were used, the highest (Elevation 861.8 feet) and lowest (Elevation 838.7 feet) proposed ash fill heights behind the dam. Material properties for the dam were derived from historical data (Acres

Stantec DESIGN BASIS REPORT

American Incorporated, 1974, 1975a; H.C. Nutting 2008) and published correlations. The piezometric line was estimated to be at the fly ash-soil cover interface and then travel through the dam to the drainage layer to the toe of the dam. The results of the long-term, drained analyses are shown in Table 6.

Table 6. Global Slope Stability Results, Existing Dam after Closure

4.3.3 Closed Impoundment

Three cross sections, shown in planview in Appendix E-2, were chosen within the closed pond footprint to evaluate for global slope stability. The sections were chosen because they were either long continuous slopes or steeper slopes. Each section was evaluated under three scenarios: short term, long term, and dynamic.

The dynamic scenario applied a 0.022g horizontal seismic coefficient (k_h) to the section and was evaluated under undrained conditions. For the dynamic case, the static, undrained shear strengths of each material were reduced by 20 percent to account for a modest loss of strength due to generation of excess pore water pressure. The horizontal seismic coefficient was selected as 50 percent of the peak ground acceleration on rock (PGA_{rock}) for the design earthquake. The use of 50 percent of PGA_{rock} is based on research from the U.S. Army Corps of Engineers (USACE) regarding seismic stability of embankments (Hynes-Griffin and Franklin 1984). They conclude that permanent deformations will be tolerable if a slope stability analysis shows at least marginal stability (factor of safety greater than or equal to 1) using k_h and reduced strengths as outlined above.

The depth of the failure surface was not restricted; therefore, the failure surface generally extended to the residual soil or to the estimated top of bedrock. A summary of the results are presented in Table 7, and a graphical representation of the analyses and summary of material parameters can be found in Appendix E-2. Because no liquefaction is anticipated (Section 4.4), the post-earthquake case would utilize the same strengths as the dynamic case, but with no horizontal seismic coefficient $(k_h=0)$. Thus, no additional analysis is needed to show that this case exceeds the minimum target factor of safety.

Veneer stability is often highly dependent on the interface shear strength between specific components of the cover layer. An additional analysis was performed to determine if sufficient shear strength was provided within the soil cover and between its interface with the fly ash fill. As shown in Appendix E-3, the veneer stability spreadsheet was used to analyze two sections: one with the longest straight-line continuous slope and another with the steepest final grade slope. Each section was analyzed under drained, saturated, seismic, and static residual stability conditions. The relevant material properties used in the analyses were the same as those used in the global stability calculations.

For the seismic veneer stabilizing case, the results of ground response analyses (Section 4.4.2.2) were used to estimate the ground surface accelerations at the top of the soil cover. The range of ground surface accelerations was found to be between 0.05g and 0.1g. Therefore, a value of 0.1g was used in the veneer stability analyses. The spreadsheet calculates the factor of safety against sliding for a range of interface friction angles for each scenario. Results and plots of the minimal necessary strength "envelopes" (combinations of friction angle and adhesion) and are included in Appendix E-3, as are derivations of the veneer stability equations. From this spreadsheet, due in large part to the gentle slopes of the final surface, it is determined that stability of the closed facility under the conditions analyzed is acceptable.

4.3.4 Spillway Cut and Borrow Sites

Because construction of the spillway cut and borrow sites will require rock excavations that are to become permanent site features, the slopes must be designed to meet appropriate criteria. Also, because blasting is likely near site features that need to be protected, a discussion is included on how such work can be governed and monitored during construction.

4.3.4.1 Rock Slope Design

Rock slopes have been designed for the four potential borrow sites at the project. Borrow Sites 1, 2, and 4 (refer to the permit drawings for a plan view and profiles of all borrow sites) may be developed to varying degrees, at the contractor's discretion. Slopes shown for these borrow sites represent the greatest extent that the contractor could elect to develop; that is, they represent the steepest slopes that could remain and the greatest lateral extent of development

Stantec DESIGN BASIS REPORT

(often constrained by a buffer zone away from gas lines around the facility perimeter). As part of developing efficient means and methods to construct the project, the contractor may choose not to develop certain borrow sites or to only partially develop certain sites.

The development of Borrow Site 3, near the existing emergency spillway cut, is required to allow the main drainage channel to exit the pond footprint. The cut slope geometry also incorporates a road that was requested by AEP to allow access to monitoring wells and gas lines. The southern side of this "new spillway cut" must be built as shown on the drawings, while the northern side represents a minimum required cut. The contractor could propose expanding this cut to the north (within limits dictated by gas lines farther to the north) to generate more borrow material from this site. Such a modification could be considered by AEP and the design engineer during construction through a submittal by the contractor for an alternate geometry.

The design of proposed rock cut slopes was performed in accordance with guidance from the West Virginia Department of Transportation (WVDOT), Division of Highways. The design directive is entitled "DD-403, Guide for Design in Cut Sections through Bedrock" (WVDOT 2006). Although this guidance is not mandatory for this type of project, it was judged to be an appropriate resource to serve as a design basis for rock slopes at the project. The guidance attempts to balance construction costs (i.e., minimizing the amount of excavation) with longterm maintenance (i.e., minimizing cleanup costs related to rockfalls). It is also written to allow a certain degree of flexibility to account for unique site geology, geometric, and/or construction issues.

WVDOT provides design guidance based on four bedrock types. The four types are not based purely on geology, instead they are based on slope angles that are considered appropriate based on experience and historical performance. The types are described in general terms (see Table 8) by geology, unconfined compressive strength (UCS), and slake durability index (SDI). Based on the rock type, guidance is then provided regarding maximum slope, bench width, and backslope height. Guidance is also provided regarding slopes in the overburden zone.

Table 8. WVDOT Rock Types for Cut Slope Design (WVDOT, 2006)

At Borrow Sites 1, 2, and 4, rock coring was not within the scope of Stantec's geotechnical exploration. However, historical borings and/or geologic profiles provided by AEP were available for Sites 1 and 4, and monitoring well logs were available for the lower portion of rock within Site 2. No UCS or SDI data were available for Sites 1, 2, or 4, and limited information was recorded on the boring logs regarding rock quality (e.g., percent core recovery, rock quality designation (RQD)). Generally, the rock at these sites consisted of layers of clay shale upwards of 20 feet thick and layers of interbedded siltstone, sandstone, and clay shale approaching 30 feet thick. Due to the presence of the clay shale and the limited degree of available data, these materials were classified as Type 4. Based on the range of allowable parameters for Type 4 rock, the design includes 3H:1V slopes in soft, erodible soils and 1H:1V slopes in competent rock with a 10-foot bench width.

At Borrow Site 3, Stantec performed 4 borings that included soil sampling and rock coring. The field engineer photographed the rock core and recorded the percent recovery and RQD. Stantec performed UCS and SDI testing on the predominant strata encountered in the borings. In addition, AEP provided several historical borings and a geologic profile in the vicinity of Site 3. The rock at these sites consisted of layers of interbedded shale and sandstone upwards of 30 feet thick, claystone up to 5 feet thick, shale up to 9 feet thick, and sandstone up to 30 feet thick. The sandstone was classified as Type 2, while all other materials were classified as Type 4. Based on the range of allowable parameters for Type 2 rock, the design included 1H:1V slopes (the allowable 1/2H:1V slopes were not necessary). No benches were required within the sandstone, due to the limited height exposed. For the Type 4 rock, the design includes 1H:1V slopes and 10-foot bench widths for the competent rock with 2H:1V slopes in the soft, erodible soils.

For comparison, historical drawings show that the existing rock slopes in the emergency spillway are 1H:1V in strata similar to that expected at the four borrow sites. Recent observations of these cut slopes show that the slopes are in good condition, and plant personnel reported little need for maintenance with regard to rockfall.

It should be noted that the designs described herein and depicted on the drawings are approximate and are based on geologic information from limited subsurface information, laboratory testing, and historical records. Boring logs and related information depict approximate subsurface conditions at discrete locations and at the time of drilling. Conditions at other locations may differ from those at the boring locations. Also, the passage of time may result in a change in the subsurface conditions at any boring location. Actual conditions between borings are unknown and may differ from those shown. Benches that are positioned at specific elevations on the drawings are often based upon encountering certain weaker strata. During construction, if weaker strata are found at different locations (vertically and/or laterally), the slope design may need to be adjusted to suit actual field conditions. If AEP or the contractor proposes alternate rock slope geometry during construction based on actual field conditions, the design engineer should be engaged to evaluate the proposed changes.

4.3.4.2 Rock Excavation

Rock excavation will be required to construct the cut near the existing emergency spillway, where the new drainage channel will exit the pond footprint. In addition, the contractor may elect to develop one or more of the other designated borrow sites to generate additional material for use as fill. It is likely that rock excavation will be performed using blasting; therefore, to protect structures of interest both on- and off-site, it will be important for AEP to control this work through appropriate construction specifications.

Protection of nearby dwellings, buildings, utilities, or other sensitive structures is typically regulated by establishing certain controls on the blasting, coupled with monitoring to verify compliance. Three phenomena that can damage nearby structures are ground vibration, airoverpressure (airblast), and flyrock. Specification CE-04A Rock Blasting provided in Appendix B-3 defines project requirements for blasting including procedures to minimize impacts from these hazards.

4.3.5 Stability During Construction

4.3.5.1 Concept

During construction, temporary slopes will be generated during the excavation (dredging) and filling processes. Due to the nature of the dredging process, it is assumed that slopes of significant grade will be temporary and below water level. Similarly, due to the nature of the sluicing and sedimentation process, it is assumed that no fill slopes of significant grade will be created.

The existing dam is assumed to remain stable during construction, as it is not being modified by the closure, other than removing some sluiced ash along a portion of the upstream face.

However, the rate of decrease in the pond elevation must be properly regulated to avoid a slope failure (due to rapid drawdown) along the upstream face of the dam.

The primary items of concern for interim stability during construction are the dredge containment dikes that will be constructed in upstream areas to impound the sluiced material as it is deposited. These containment dikes have flexibility in the design based on the materials available and the construction elevation height needs.

The dikes have been designed using a 30-foot minimum crest width, 4 horizontal to 1 vertical (4:1) sideslopes, and a maximum height of 24 feet. They have slope protection along the sideslopes and a graded stone surface for an access road along the crest. To address seepage and piping concerns during initial analyses, a chimney drain, blanket drain, and a seepage blanket have been designed. It will be the contractor's responsibility to establish a stable subgrade for construction of the dike.

Target factors of safety for short-term (i.e., during construction and end of construction) slope stability are as shown in Section 4.3.1. The potential for piping was evaluated because upward seepage toward the ground surface is anticipated during dredging activities. The toe of the dredge containment dike was evaluated in areas of high upward gradient and within a few feet of the phreatic surface near the embankment toe. For this design, we used the factor of safety against piping (FS_{piona}) as defined by the U. S. Army Corps of Engineers (USACE) for the design and assessment of dams (USACE, 1993). The current USACE design criteria (EM 1110-2-1901) generally requires:

• Toe of a downstream seepage berm $FS_{pipina} \ge 1.5$

The material properties used in the seepage and stability analyses were derived from the lab and field testing performed during the geotechnical exploration, historical data from the site, and correlated values with published data when necessary. Material properties used for these analyses are summarized in Appendix E-4.

4.3.5.2 Dike Design

The dimensions and construction of the design dredge dike are shown on the details of the design drawings. The models use a 30-foot crest width, 4H:1V sideslopes, and a 25-foot dike height. The 25-foot height exceeds the maximum allowable height and provides for another factor of safety in the analysis. Slope protection is modeled along the dike crest and slopes to protect against erosion.

Material parameters were based upon laboratory testing data (Stantec, 2012d) and historical design shear strengths (H. C. Nutting, 2008; Acres American Incorporated, 1974). The embankment model assumes compacted fly ash composes the embankment. The slope protection and seepage blanket were modeled using the random rock fill properties from Acres American Incorporated (1974). This should be representative of the durable rock available from the proposed borrow sites for this project. For the chimney and blanket drains, a filter design was performed to determine an appropriate drainage material within the fly ash dike. AASHTO

Type A sand was selected for the design. Alternative filter materials might be available for construction activities and should be checked against the design requirements. Sluiced and compacted fly ash material parameters were based upon laboratory testing of Shelby tubes taken during Stantec's 2012 field exploration. Dredged fly ash properties were assumed to be similar to the sluiced ash results with the exception of the selected anisotropy ratio.

For purposes of stability analysis, it was assumed that the compacted fly ash dikes will be constructed directly on the existing sluiced fly ash surface of the pond. No foundation improvements, bridging layers, or geosynthetic reinforcement were modeled, although the contractor should consider constructability issues related to localized soft zones on the ash surface.

The phreatic surface was defined using a seepage model (analyzed using GeoStudio 2007 SEEP/W). Boundary conditions for the seepage model were based on the spillway designs of the dredge dikes. The design storm event allows a short-term, one-foot freeboard upstream of the dredge dike. The model was run assuming dredged ash at the principal spillway elevation with the design storm event raising the pool level to a one-foot freeboard upstream of the dike. A second model was run assuming no dredged ash is present and water has risen upstream to a one-foot freeboard.

The chimney drain was designed at approximately half of the dredge dike height, in line with the downstream edge of the dike crest. It is modeled at a thickness of three feet. The seepage blanket extends 18 feet beyond the downstream toe of the dredge dike. It is three feet thick with a 3H:1V downstream toe.

4.3.5.3 Results

The laboratory test results for the consolidated undrained (CU) triaxial testing suggests that drained strength within the sluiced ash controls over the undrained strength properties due to the fly ash's dilative nature at low confining pressures. The stability analyses were run using the selected drained strengths as a more conservative estimate of slope stability. In reality, excess pore water pressures are created during sluiced ash placement and dike construction; however, it will begin to dissipate immediately. It is unclear how quickly the fly ash transitions from undrained to drained behavior.

Stability cross sections, material parameters, and results are shown in Appendix E-4. Results are also summarized in the following table (Table 9). The runs all assume a 25-foot tall dike constructed of compacted fly ash with a chimney drain, seepage blanket, and stone slope protection.

The results show that the assumed dimensions and materials for the dredge containment dikes are capable of meeting target factors of safety for stability and seepage. It is possible that a greater number of shorter dikes, or dikes raised in multiple stages, may be preferred by the contractor due to constructability concerns and/or operational and sequencing issues. The above analyses for the more conservative cases demonstrate that properly designed shorter dikes should also be capable of meeting stability criteria.

It is recommended that appropriate construction observation methods be employed to monitor actual performance of the dike and foundation materials during loading. The rate of fill placement, development of excess pore water pressures (using piezometers), and potential slope deformations (using survey markers or inclinometers) should be monitored and analyzed throughout construction. Refer to Section 4.5 regarding recommended instrumentation during construction.

4.4 LIQUEFACTION POTENTIAL

4.4.1 Seismic Liquefaction

Because sluiced fly ash is typically a saturated, loose, cohesionless material, it is susceptible to liquefaction if subjected to a sufficiently large earthquake. Strength loss due to liquefaction can lead to settlement and/or slope deformations, depending on material parameters and site geometry. The NCEER method compares the liquefaction resistance of a soil, expressed in terms of a cyclic resistance ratio (CRR), to the cyclic stress ratio (CSR) induced by the design earthquake. Both the CRR and CSR represent a shear stress normalized with respect to the vertical effective stress in the soil. The factor of safety against liquefaction (FS_{lin}) is computed by taking the ratio of CRR and CSR:

$$
FS_{liq} = \frac{CRR}{CSR}
$$

Seismic loads were estimated using the site-specific design earthquake ground motions and a site-specific ground response analysis (using ProShake software). Liquefaction resistance was estimated based on laboratory data (cyclic triaxial testing) for fly ash from the Amos Plant.

4.4.2 Site-Specific Seismic Study

4.4.2.1 Definition of Design Seismic Event

The design earthquake event has been defined probabilistically on the basis of a site-specific seismic hazards study. The legislative rule (refer to Department of Environmental Protection, Water Resources, Dam Safety Rule, §47-34-7.4.b.1.D.1(d)) does not specify an appropriate design earthquake recurrence interval (i.e., return period). Consistent with engineering practice and AEP direction, the design earthquake event corresponds to a 2% probability of exceedance in 50 years (recurrence interval $= 2.475$ years).

4.4.2.2 Site-Specific Design Seismic Events and Ground Motions

Stantec coordinated with its seismology subconsultant, Pacific Engineering and Analysis (Pacific), to perform site-specific seismic study and develop the design seismic events and associated ground motions (i.e., time histories). Pacific's report (Pacific Engineering and Analysis, 2011), which describes their methodology and results, is provided as an appendix in our Geotechnical Data Report (2012d). Stantec (2012d) is included in Appendix D.

Uniform hazard spectra (UHS) were developed using probabilistic methods. Dominant individual design events were then selected by deaggregating the hazard and identifying primary contributors in terms of magnitude and epicentral distance. Two design earthquake scenarios were identified for development of ground motion time histories. The first scenario is a M5.5 event relatively close to the project site (epicentral distance in the range of 10-50 km). The second scenario is a M7.5 event at a greater distance from the project site (epicentral distance in the range of 75-200 km). Pacific used deterministic methods to derive design spectra and ground motion parameters that are consistent with both the UHS and the two design event scenarios. Key ground motion parameters for the design events used in this study are summarized in [Table 1](#page-1817-0)0.

The design event acceleration time histories represent the expected subsurface ground motions at the top of bedrock and not a free-surface or outcrop motion. Stantec supplied Pacific with basic geologic parameters for the site, such as soil type, rock type, approximate depth to bedrock ("soft rock"), and depth to "hard rock" (the fundamental seismic hazard model for central and eastern United States assumes "hard rock" geology). Pacific estimated a range of reasonable shear wave velocities for overburden (i.e., alluvium) and soft rock and estimated average unit weights for the overburden and soft rock. These parameters were based on existing site information and regional geologic information, some of which was supplied by AEP. The design ground motions, which were derived from historic acceleration records, were spectrally matched to the deterministic design spectra, in accordance with the standard of practice. The peak acceleration and duration of shaking at the top of bedrock for each earthquake scenario is listed in [Table 1](#page-1817-0)0. Note that, while the peak horizontal accelerations for the two scenarios are rather similar, the duration of the larger magnitude event is significantly greater than that of the smaller magnitude event.

Table 10. Bedrock Ground Motion Parameters for Seismic Evaluation of AEP Amos Fly Ash Pond Closure1

¹Parameters shown are at top of soft rock/base of soil.

4.4.3 Cyclic Triaxial Testing

AEP provided results from cyclic triaxial testing that was performed on fly ash from Amos at The Ohio State University (OSU) (OSU, 2012). As part of our Supplemental Scope of Work, Stantec collaborated with the University of Kentucky to perform additional cyclic triaxial tests on Amos fly ash (Stantec, 2012e).

4.4.3.1 The Ohio State University Data

AEP provided Stantec the report prepared by OSU for the fly ash liquefaction potential at Amos Fossil Plant (OSU, 2012). OSU prepared 10 specimens from the Amos fly ash by pluviating the material in water to a range of initial densities. The specimens were then tested at confining stresses ranging from 10 to 40 pounds per square inch (psi) and cyclic stress ratios (CSR) ranging from 0.1 to 0.4 as shown in [Table](#page-1817-1) 11. After testing, OSU reviewed the data and number of cycles to liquefaction (N_{liq}) was determined as the first occurrence of either:

- Axial stress reported was less than 95% of the programmed loading, or
- Effective confining stress reached a minimum value of zero (i.e., r_{u} =1) (OSU, 2012).

Table 11. Ohio State University – Cyclic Triaxial Laboratory Data for Amos Fly Ash

 1 Samples that did not liquefy were tested for 500 cycles before ending the test.

One Team, Infinite Solutions.

[Figure](#page-1818-0) presents the number of cycles required for each sample to liquefy using the above liquefaction criteria. Typically, it is expected that the number of cycles of liquefaction increases as the confining pressure increases (all else equal). However, data would indicate that the samples tested at 10 psi are more resistant to liquefaction than those tested at 20 psi and 40 psi. This could be correct if samples at 10 psi are dilative while samples at 20 psi and 40 psi are more contractive. The results for the 20 psi generally provide a lower bound for the available data.

Figure 3. Results from the OSU Cyclic Triaxial Testing for the Amos Fly Ash Specimens

4.4.3.2 University of Kentucky Data

To supplement the OSU data, Stantec and the University of Kentucky (UK) performed two additional cyclic triaxial tests on the Amos fly ash, as documented in our Supplemental Geotechnical Data Report (Stantec, 2012e). UK prepared two specimens from the Amos fly ash by pluviating the material in water to a range of initial densities. UK tested the samples with CSR values of 0.135 and 0.269, and both samples had a 20-psi confining pressure applied. Using the same definition of liquefaction as OSU, Stantec estimated the number of cycles to liquefaction for the UK data as shown in [Table .](#page-1819-0) The number of cycles to liquefaction of Test No. 1 was governed by the axial stress criteria, while Test No. 2 was governed by the excess pore pressure ratio criteria.

[Figure](#page-1819-1) presents the number of cycles required for each sample to liquefy using the above liquefaction criteria for both the OSU and UK data. The UK data provided additional data in the 0.1 to 0.2 CSR range, which was previously undefined by the OSU data. The UK data reaffirms the trend shown by the OSU data for a confining pressure of 20 psi; therefore, the 20-psi cyclic triaxial data was used to estimate the cyclic resistance ratio of the Amos ash.

4.4.3.3 Cyclic Resistance Ratio (CRR)

For samples of similar initial density, relationships between the imposed cyclic stress and the number of cycles to liquefaction failure are observed. These relationships define the cyclic resistance ratio (CRR) for the material, which can then be compared against the cyclic stress ratio (CSR) imposed by any design earthquake of interest. Methodology outlined by Idriss and Boulanger (2008) was used to adjust the laboratory CRR to an appropriate field CRR for the site conditions and design earthquake (geometry, in situ stresses, earthquake magnitude, etc.). The

primary benefit of this approach is the use of site-specific materials and development of a CRR relationship for the specific material. This is particularly relevant for fly ash, as many of the published relationships and correlations are based on testing of sands and may not be as appropriate for fly ash. The primary drawback of such a method is that fly ash samples must be reconstituted in the lab and may not be representative of the undisturbed, in-situ materials.

The approach used site-specific ground response analysis to estimate the load (CSR) imposed by the design earthquake. Because the cyclic triaxial results are not specific to a particular location within the fly ash pond, three generic soil columns were derived for the site and were used in a ground response analysis and to estimate the CSR. Shear wave velocities for the sluiced ash were based on CPT testing performed during the geotechnical exploration, while shear wave velocities for other soils were estimated based on published correlations that are typically related to effective stress and soil type.

The methodologies outlined above, along with the results, are summarized in a series of example calculations in Appendix E. Both the M7.5 and M5.5 earthquakes were evaluated. Considering the CRR derived from laboratory testing of Amos fly ash, the M7.5 event controlled for all three generic profiles. The larger magnitude event controlled because its longer duration (more cycles of shaking) results in a lower CRR compared to the shorter duration, smaller magnitude event. The CSR for the M7.5 event was higher than that of the M5.5 event for two of the three profiles, but the greater difference in CRR was such that the resulting factor of safety (FS_{liq}) was lower for the M7.5 event for all three profiles. For both events and all three profiles, FS_{lin} was shown to be above the typical threshold value of 1.4 (values less than 1.1 indicate fully liquefied conditions, while values of 1.1 to 1.4 are partially liquefied), meaning that no liquefaction would be anticipated.

4.4.3.4 Static Liquefaction

Static liquefaction is a phenomenon that can occur when a soil experiences significant strain softening (i.e., strength loss beyond the peak strength) due to static loading or creep, often resulting in a flow failure. Contractive soils, which can include hydraulic fill (including some types of sluiced fly ash), can be particularly susceptible to static liquefaction during undrained shearing. The potential for static liquefaction is related to two key material parameters: (1) the strain level at peak strength and (2) the decrease in strength from peak to residual (often expressed as a sensitivity ratio) as strain increases. If peak strength is realized at very small strains, there exists a greater probability that static loads and/or creep could surpass the peak. If the material is highly sensitive, yet a slope or facility was designed based on peak strength, there exists a greater probability that any exceedance of the peak strain will lead to a flow failure.

Laboratory results (15 consolidated-undrained triaxial tests) of Amos fly ash indicate that in general, the material behavior is dilative or near a transition from dilative to slightly contractive (see Appendix E). Dilative behavior is typically observed at lower confining pressures and a transition towards slightly contractive behavior is observed at higher confining pressures, as would be expected. Dilative materials do not exhibit distinct peak strength in undrained shear, as the strength continues to climb as the specimen attempts to dilate. It should be noted that several of the laboratory specimens showed signs of air bubbles in the testing apparatus used to measure pore water pressure. This is indicated by non-responsive pore water pressure

readings as the values become more negative during shear. The impact on the data is that the deviator stress does not continue to go upward as it should if the negative pore water pressures could be correctly measured. This could lead to underestimating the undrained shear strength of such dilative materials.

To account for static liquefaction potential during design, two approaches could be used: (1) avoid undrained loading scenarios that could mobilize the peak strength/strain or (2) design based on residual strengths. For weak, contractive materials, it is typically not feasible to design based on residual strengths. Therefore, the preferred approach is to design with adequate safety margins for undrained conditions, to avoid approaching the peak strength/strain. Meeting the regulatory defined minimum factors of safety for short-term, undrained conditions is only a first step in this process.

The current design considers the stress-strain behavior and sensitivity of the sluiced fly ash. Because the Amos fly ash is judged to be dilative, and thus stronger when sheared in undrained conditions, the design is actually based on the lower, drained strengths. Further, the dilative behavior makes it unlikely that a flow failure due to static liquefaction would occur (i.e., no significant strain softening). The gentle slopes of the proposed closure provide ample safety margins, given the drained and undrained strength of the fly ash. The more critical case is the undrained loading of the ash due to the temporary dredge containment dikes, which have somewhat steeper side slopes and thus lower safety factors. Because the dikes will be relatively short, the areas of concern within the foundation would be relatively shallow. Shallow areas correspond to low confining pressures; thus, dilative behavior would be more likely. Regardless, construction observation and instrumentation should be used during construction (Section 4.5) to check for signs of elevated pore pressures and/or slope movement that could lead to an undrained failure.

4.5 INSTRUMENTATION

During construction, the use of field instrumentation is recommended to monitor actual conditions and compare with those assumed during design. Post-closure monitoring using instrumentation is also recommended to monitor long-term performance of the facility and to meet any regulatory permitting requirements. A detailed discussion of the instruments and proposed locations can be found in the following sections.

The construction instrumentation and monitoring program recommended below is a baseline for the initial dredge containment dike(s) constructed during the project. However, it is likely that the Contractor's approach, including construction methods and their operation of the dredge containment cells will influence how the monitoring program can be best utilized. The instrumentation and monitoring program for subsequent dikes should be reviewed and potentially adapted based on analysis of data and observed performance of the initial dikes.

4.5.1 Piezometers

The primary geotechnical issue during construction is the stability of temporary/interim dredge containment dikes. With respect to both slope stability and piping failure modes, there is a need to monitor pore pressures in the sluiced fly ash foundation in the vicinity of the dikes. We recommend installation of standpipe piezometers that can be read manually or vibrating wire piezometers that can be read using an automated data acquisition system (ADAS), along with routine monitoring and timely analysis of the resulting data throughout construction. General recommendations for the piezometers are given below. More specific requirements will be developed as part of the construction documents.

- Within each dike there should be a minimum of six piezometers installed. These piezometers will be arranged along three separate cross sections of the dike. The crosssections (upstream to downstream) will have a piezometer at each critical area of interest (i.e., crest and downstream toe). One cross-section should be located through the center (lengthwise) of the dike, and the maximum allowable distance between crosssections (in plan) is 100 feet.
- Instruments should be installed prior to construction of each dredge containment dike. Special considerations will have to be made to protect installed instruments during construction. The elevation of the standpipe including additional riser lengths will have to be closely monitored and documented during construction so that water level elevations can be accurately referenced.
- Monitoring thresholds will be established to link observed readings with field actions such as slowing or accelerating the rate of fill placement, decreasing pool levels, or other risk reduction measures.
- If desired, piezometers could utilize electronic pressure transducers with ADAS to allow frequent monitoring and observations of fluctuations and trends in pore pressure. Automation may not be needed during construction if staff will be on site to take daily measurements. The ADAS option could also be implemented post-construction by installing pressure transducers within the open standpipe piezometers to monitor the site for an extended period afterward.
- Instruments must be designed and protected against construction activities (excavations, traffic) and the elements (standing water, lightning).
- Piezometers can be installed in open boreholes using the fully grouted method, in which the transducer and data cable are surrounded by a grout mixture instead of a filter sand zone. Fully grouted piezometers are becoming more common, particularly for short-term projects, due to the simplified backfilling method, quicker response time (i.e., more compliant in lower permeability soils), and ability to easily install multiple instruments in a single borehole if desired. However, the data could not be manually verified by a water level indicator as could be done for a transducer in an open standpipe.
- Data from unvented transducers must be corrected for site-specific fluctuations in barometric pressure. This is simply addressed by installing a barometer onsite that can be used to correct all of the piezometer data during post processing. Although vented

piezometers, which do not require barometric correction, could be used, they can be prone to problems with the vent clogging (air bubbles or other problems). Vented piezometers are also not as suitable for the fully grouted installation method.

- In order to correlate piezometer readings with potential influencing factors, we recommend periodic monitoring of the pond elevation, dredge area pool elevations, and daily precipitation. Such readings could be performed manually (staff gauge, rain gauge, etc.) or they could also be automated.
- If the system is automated, the use of transducers, as opposed to open standpipes, would allow data cables from multiple instruments to be routed to one or more centralized locations for data collection. Such location(s) could be selected to avoid hightraffic areas during construction. If warranted, telemetry systems (wired or wireless) could be added to allow remote data transfer and monitoring, although this increases the costs and complexity of the system.
- Data should be collected weekly at a minimum when no sluicing or stacking is occurring and daily during the ash sluicing or stacking process. If excessive pore pressures are generated, additional measurements may be warranted to assess stability.

4.5.2 Vertical Slope Inclinometers

Vertical slope inclinometers (SI) can be installed within or near slopes to detect small initial movements that may alert the user to the potential for larger slope failures and allow time for risk reduction measures to be implemented. Inclinometers will be considered for use near the downstream toe of dredge containment dikes during construction, but are probably not warranted for use after closure due to the gentle final slopes. General recommendations are provided below. More specific requirements will be developed as part of the construction documents.

- Slope inclinometers (SIs) should be located at the critical area of interest (i.e., downstream toe of dike). A minimum of one inclinometer should be placed within a given temporary/interim dredge containment dike. The inclinometer should be located next to the piezometer at the downstream toe of the center (lengthwise) cross-section (see Section 4.5.1). If additional inclinometers are warranted they should be placed at the downstream toe at the same cross section(s) as other piezometers.
- Instruments should be installed prior to construction of each dredge containment dike. Special considerations will have to be made to protect installed instruments during construction. The initial elevation of the casing will have to be well documented, and additions to the casing will have to be well documented to accurately reference slope inclinometer readings.
- Monitoring thresholds could be established to link observed readings with field actions such as slowing the rate of fill placement or other risk reduction measures.
- The bottom of the SI casing must be a fixed reference point. Thus, it must be installed in stable rock (preferred, if depth to rock is reasonable) or soil that is known to be well below any reasonable failure surface.
- In an overall program that involves both SIs and fully grouted piezometers, some cost efficiency can be realized by installing the piezometers on the outside of the SI casing, thus eliminating an extra borehole.
- Data should be collected weekly at a minimum when no sluicing or stacking is occurring and daily during the sluicing or stacking process. If excessive movements are observed, additional measurements may be warranted to assess stability.

4.5.3 Existing Instrumentation

AEP maintains a network of piezometers and surface deformation monuments across the crest and downstream face of the existing dam. They currently have one pneumatic piezometer in the sluiced fly ash (installed in 2008 - B-17). As part of Stantec's geotechnical exploration, two open standpipe piezometers (with pressure transducers and ADAS) and one multilevel groundwater sampling system were installed within the sluiced fly ash. We recommend that all of these instruments be protected and periodically monitored during construction. The value of data from specific instruments may depend on their proximity to active areas of construction (excavation, fill, fluctuating pools, etc.).

4.5.4 Post Closure

The Dam Safety Rule (W. Va. Code §22-14-4 and §22-14-19) establishes the guidelines required to operate and abandon a dam in the state of West Virginia. Within the Dam Safety Rule, guidelines are presented regarding instrumentation and monitoring of said instruments. Given that the pond closure will be addressed through a modification of the existing permit (as opposed to the dam abandonment process), existing monitoring wells and any other instrumentation should continue to be monitored as required under existing permits and regulations. If abandonment of the dam becomes an option in the future, the proposed construction instrumentation could be used to support compliance with the abandonment guidelines.

Instrumentation installed during closure activities could be monitored (at AEP's discretion) to measure the phreatic surface and saturation levels of the ash over time. The cap will reduce the infiltration into the impoundment, but seasonal changes will likely have an impact on the ash saturation levels, therefore, data could be collected at a minimum monthly. If personnel will not be on-site frequently, the automation of data collection may be the most efficient method to take routine, periodic measurements. Pressure transducers can be installed within open standpipe piezometers to record hourly, daily, or weekly measurements. The data from the transducers would be retained on the instrument until personnel downloads the data during a site visit.

5.0 References

- Acres American Incorporated (1974). "Draft, Preliminary Design Report, John E. Amos Plant, Fly Ash Retention Dam, Stage 2." Prepared for Appalachian Power Company, November.
- Acres American Incorporated (1975a). "Geotechnical Data for Bidders, Volume 2 (Phases 1 and 2 Investigations), John E. Amos Plant, Fly Ash Retention Dam, Stage 2." Prepared for Appalachian Power Company.
- Acres American Incorporated (1975b). Various Stage 2 construction drawings, John E. Amos Plant, Fly Ash Retention Dam, Stage 2. Prepared for Appalachian Power Company.
- American Electric Power (1995). "EPRI Ground Water Study Amos" (partial), Boring Logs and Monitoring Well Construction Logs. Unit 3 – Fly Ash Pond Monitoring Program. August.
- American Electric Power Service Corporation (AEPSC) (1993). "Dam Break Analysis". Appalachian Power Company. John Amos Fly Ash Dam, West Virginia ID #03911. Civil Engineering Division. November.
- American Electric Power Service Corporation (AEPSC) (2008b). "Monitoring and Emergency Action Plan and Maintenance Plan". For the John E. Amos Plant Fly Ash Dam, WV ID #07911. Winfield, Putnam County, West Virginia. Prepared for Appalachian Power Company. January 28.
- Chow V., D. R. Maidment, and L. W. Mays. (1988). Applied Hydrology. McGraw Hill, Singapore, 461.
- H. C. Nutting (2008). "Geotechnical Data Collection Report, Amos U3 Fly Ash Dam Raising Study" Prepared for American Electric Power. February.
- Hynes-Griffin, M. E., and Franklin, A. G. (1984). "Rationalizing the seismic coefficient method." Miscellaneous Paper GL-84-13, U.S. Army Engineer Waterways Experiment Station, July, 37 pages.
- Idriss, I.M. and Boulanger, R.W. (2008). "Soil Liquefaction During Earthquakes." Monograph, Earthquake Engineering Research Institute, Oakland, California.
- Konya, C. J., and Walter, E. J. (1990). Surface Blast Design. Second Edition, Prentice Hall Publishing, Englewood, New Jersey.
- National Oceanic and Atmospheric Administration (NOAA) (2011). NOAA Atlas 14: Precipitation-Frequency Atlas of the United States. National Weather Service, Silver Spring, Maryland.
- National Oceanic and Atmospheric Administration (NOAA) (1978). Hydrometeorological Report No. 51. Probable Maximum Precipitation Estimates, United States, East of 105th Meridian. Washington, D.C. June.
- Pacific Engineering and Analysis (2011). "Development of Design Ground Motions for the John E. Amos Plant Fly Ash Pond Closure, Draft Report." Prepared for Stantec Consulting Services Inc., December.
- Stantec Consulting Services Inc. (2011a). "Work Plan, Fly Ash Dam Complex Closure, John E. Amos Plant" Prepared for American Electric Power, August.
- Stantec Consulting Services Inc. (2012a). "Data Gaps Memorandum, Fly Ash Dam Complex Closure, AEP John E. Amos Plant; Data Gap Analysis and Phase 2 Exploration Recommendations – Rev. 1" Prepared for American Electric Power, January.
- Stantec Consulting Services Inc. (2012b). Amos Ash Pond Complex Closure, Conceptual Design Report. John E. Amos Power Plants. Putnam County, West Virginia. February.
- Stantec Consulting Services Inc. (2012c). 30-Percent Design Drawings, Fly Ash Dam Closure. John E. Amos Power Plant. Scary, West Virginia. Prepared for American Electric Power. April.
- Stantec Consulting Services Inc. (2012d). "Geotechnical Data Report (Revision 2), Fly Ash Dam Complex" Prepared for American Electric Power, October.
- Stantec Consulting Services Inc. (2012e). "Revised Supplemental Geotechnical Data Report, Fly Ash Dam Complex" Prepared for American Electric Power, October.
- State of West Virginia (2009). "Title 47, Legislative Rule, Department of Environmental Protection, Water Resources; Series 34, Dam Safety Rule." West Virginia Code of State Rules.
- State of West Virginia (2010). "Title 33, Legislative Rule, Department of Environmental Protection, Waste Management; Series 1, Solid Waste Management Rule." West Virginia Code of State Rules.
- State of West Virginia (2011). "Chapter 22. Environmental Resources, Article 14. Dam Control Act." West Virginia Code.
- The Ohio State University (OSU) (2012). "Evaluation of Liquefaction Potential of Impounded Fly Ash: John E. Amos Power Plant, Final Report." Prepared for American Electric Power, June.
- U. S. Army Corps of Engineers (USACE) (1993). Engineering and Design, Seepage Analysis and Control of Dams. EM 1110-2-1901. April 30th.
- US Army Corps of Engineers (USACE). (2010). Hydrologic Modeling System, HEC-HMS Version 3.4. Hydrologic Engineering Center, Davis, California.
- US Department of Agriculture (USDA). (1986). Technical Release 55: Urban Hydrology for Small Watersheds. Natural Resources Conservation Service, Urbandale, Iowa.
- West Virginia Department of Transportation (WVDOT) (2006). "DD-403, Guide for Design in Cut Sections through Bedrock." Division of Highways, July.
- West Virginia Department of Transportation (WVDOT) (2007). Drainage Manual $3rd$ Edition. Division of Highways. December.