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2020 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

COFFEEN ASH POND NO. 2, COFFEEN POWER STATION

2020 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT COFFEEN ASH POND NO. 2, COFFEEN POWER STATION

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ACRONYMS AND ABBREVIATIONS

40 C.F.R. Title 40 of the Code of Federal Regulations

AP2 Ash Pond No. 2

SSL

CCR Coal Combustion Residuals

CMA Corrective Measures Assessment
GWPS Groundwater Protection Standard
SAP Sampling and Analysis Plan

USEPA United States Environmental Protection Agency

Statistically Significant Level



EXECUTIVE SUMMARY

This report has been prepared to provide the information required by Title 40 of the Code of Federal Regulations (40 C.F.R.) § 257.90(e) for the Coffeen Ash Pond No. 2 (AP2) located at Coffeen Power Station near Coffeen, Illinois.

Groundwater is being monitored at Coffeen AP2 in accordance with the Assessment Monitoring Program requirements specified in 40 C.F.R. § 257.95. Assessment Monitoring was initiated at AP2 on April 9, 2018.

No changes were made to the monitoring system in 2020 (no wells were installed or decommissioned).

The following Statistically Significant Levels (SSLs) of 40 C.F.R. Part 257 Appendix IV parameters were determined in 2020:

- Cobalt at wells G401 and G402
- Lithium at well G401

As required by 40 C.F.R. § 257.95(g)(3)(i), a Corrective Measures Assessment (CMA) (OBG, 2019) following the requirements of 40 C.F.R. § 257.96 was initiated on April 8, 2019 and completed on July 8, 2019. This CMA was revised on November 30, 2020 (Ramboll, 2020) to address cobalt and lithium SSLs based on the recent 2020 assessment monitoring results, include additional information related to site geology/hydrogeology, and focus on application of the evaluation factors identified in 40 C.F.R. § 257.96(c) to potential groundwater corrective measures.

A public meeting was held on October 7, 2019 at the Coffeen Elementary School in Coffeen, Illinois to discuss the results of the of the CMA in accordance with 40 C.F.R. § 257.96(e).

Remedy selection is in progress and the associated semiannual reports required by 40 C.F.R. § 257.97(a) are being completed.

1. INTRODUCTION

This report has been prepared by Ramboll Americas Engineering Solutions Inc. (Ramboll) on behalf of Illinois Power Generating Company, to provide the information required by 40 C.F.R. § 257.90(e) for the Coffeen AP2 located at Coffeen Power Station near Coffeen, Illinois.

In accordance with 40 C.F.R. § 257.90(e), the owner or operator of a Coal Combustion Residuals (CCR) unit must prepare an Annual Groundwater Monitoring and Corrective Action Report for the preceding calendar year that documents the status of the Groundwater Monitoring and Corrective Action Program for the CCR unit, summarizes key actions completed, describes any problems encountered, discusses actions to resolve the problems, and projects key activities for the upcoming year. At a minimum, the annual report must contain the following information, to the extent available:

- 1. A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit.
- 2. Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken.
- 3. In addition to all the monitoring data obtained under §§ 257.90 through 257.98, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the Detection Monitoring or Assessment Monitoring Programs.
- 4. A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from Detection Monitoring to Assessment Monitoring in addition to identifying the constituent(s) detected at a Statistically Significant Increase [SSI] relative to background levels).
- 5. Other information required to be included in the annual report as specified in §§ 257.90 through 257.98.
- 6. A section at the beginning of the annual report that provides an overview of the current status of groundwater monitoring and corrective action programs for the CCR unit. At a minimum, the summary must specify all of the following:
 - i. At the start of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in §257.94 or the assessment monitoring program in §257.95.
 - ii. At the end of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in §257.94 or the assessment monitoring program in §257.95.
 - iii. If it was determined that there was a SSI over background for one or more constituents listed in Appendix III of §257 pursuant to §257.94(e):
 - A. Identify those constituents listed in Appendix III of §257 and the names of the monitoring wells associated with the SSI(s).
 - B. Provide the date when the assessment monitoring program was initiated for the CCR unit.

- iv. If it was determined that there was a SSL above the Groundwater Protection Standard (GWPS) for one or more constituents listed in Appendix IV of §257 pursuant to §257.95(g) include all of the following:
 - A. Identify those constituents listed in Appendix IV of §257 and the names of the monitoring wells associated with the SSL(s).
 - B. Provide the date when the CMA was initiated for the CCR unit.
 - C. Provide the date when the public meeting was held for CMA for the CCR unit.
 - D. Provide the date when the CMA was completed for the CCR unit.
- v. Whether a remedy was selected pursuant to §257.97 during the current annual reporting period, and if so, the date of remedy selection.
- vi. Whether remedial activities were initiated or are ongoing pursuant to §257.98 during the current annual reporting period.

This report provides the required information for the Coffeen AP2 for calendar year 2020.

2. MONITORING AND CORRECTIVE ACTION PROGRAM STATUS

Groundwater is being monitored at Coffeen AP2 in accordance with the Assessment Monitoring Program requirements specified in 40 C.F.R. § 257.95. Assessment Monitoring was initiated on April 9, 2018. SSLs were determined for Coffeen AP2 and alternate source evaluations were inconclusive. In accordance with 40 C.F.R. § 257.95(g)(5), a CMA following the requirements of 40 C.F.R. § 257.96 was initiated on April 8, 2019 and completed on July 8, 2019. A public meeting was held on October 7, 2019 at the Coffeen Elementary School in Coffeen, Illinois to discuss the results of the of the CMA in accordance with 40 C.F.R. § 257.96(e). The CMA was revised on November 30, 2020 to address cobalt and lithium SSLs based on the recent 2020 assessment monitoring results, include additional information related to site geology/hydrogeology, and focus on application of the evaluation factors identified in 40 C.F.R. § 257.96(c) to potential groundwater corrective measures. Remedy selection is in progress and the associated semiannual reports required by 40 C.F.R. § 257.97(a) are being completed.

Coffeen AP2 remains in the Assessment Monitoring Program in accordance with 40 C.F.R. § 257.96(b).

3. KEY ACTIONS COMPLETED IN 2020

The Assessment Monitoring Program is summarized in Table A. The groundwater monitoring system, including the CCR unit and all background and downgradient monitoring wells, is presented in Figure 1. No changes were made to the monitoring system in 2020. In general, one groundwater sample was collected from each background and downgradient well during each monitoring event¹. All samples were collected and analyzed in accordance with the Sampling and Analysis Plan (SAP) (NRT/OBG, 2017a). All monitoring data obtained under 40 C.F.R. §§ 257.90 through 257.98 (as applicable) in 2020, and analytical results for the August 2019 sampling event, are presented in Tables 1 and 2. Analytical data were evaluated in accordance with the Statistical Analysis Plan (NRT/OBG, 2017b) to determine any SSLs of Appendix IV parameters over GWPSs. Notifications were completed in accordance with 40 C.F.R. § 257.95(g).

Statistical background values are provided in Table 3 and GWPSs in Table 4.

Alternate source evaluations were inconclusive for one or more of the SSLs. Consequently, and in accordance with 40 C.F.R. § 257.95(g)(5), a CMA following the requirements of 40 C.F.R. § 257.96 was initiated on April 8, 2019 and the required notification completed. The CMA (OBG, 2019) was completed on July 8, 2019 and posted to the publicly accessible website, as required by 40 C.F.R. § 257.107(h)(8). This CMA was revised on November 30, 2020 to address cobalt and lithium SSLs based on the recent 2020 assessment monitoring results, include additional information related to site geology/hydrogeology, and focus on application of the evaluation factors identified in 40 C.F.R. § 257.96(c) to potential groundwater corrective measures.

Remedy selection is in progress and the associated semiannual reports required by 40 C.F.R. § 257.97(a) were completed in January and July of 2020.

¹ Sampling was limited to G401 during the May 2020 sampling event to confirm cobalt concentrations initially detected at concentrations greater than the GWPS in the preceding sampling event, as allowed by the Statistical Analysis Plan.

Table A – 2019-2020 Assessment Monitoring Program Summary

Sampling Dates	Analytical Data Receipt Date	Parameters Collected	SSL(s)	SSL(s) Determination Date	CMA Initiated
August 16-20, 2019	October 15, 2019	Appendix III			
		Appendix IV Detected ¹	Cobalt (G401, G402) Lithium (G401)	January 13, 2020	NA
January 22 and 24, 2020	April 15, 2020	Appendix III			
		Appendix IV	Cobalt (G401) Lithium (G401)	July 14, 2020	NA
May 6, 2020 ²	May 19, 2020	Appendix IV Greater than the GWPS ³			
August 12, 2020	October 15, 2020	Appendix III			
		Appendix IV Detected ¹	TBD	TBD	NA

Notes:

NA: Not Applicable
TBD: To Be Determined

- 1. Groundwater sample analysis was limited to Appendix IV parameters detected in previous events in accordance with 40 C.F.R. § 257.95(d)(1).
- 2. Sampling was limited to G401 during the May 2020 sampling event to confirm Appendix IV parameters initially detected at concentrations greater than the GWPS in the preceding sampling event to confirm SSLs, as allowed by the Statistical Analysis Plan.
- 3. To confirm the SSL, as allowed by the Statistical Analysis Plan, a groundwater sample was collected and analyzed for the Appendix IV parameter initially detected at a concentration greater than the GWPS in the preceding sampling event.

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4. PROBLEMS ENCOUNTERED AND ACTIONS TO RESOLVE THE PROBLEMS

No problems were encountered with the Groundwater Monitoring Program during 2020. Groundwater samples were collected and analyzed in accordance with the SAP and all data were accepted.



5. KEY ACTIVITIES PLANNED FOR 2021

The following key activities are planned for 2021:

- Continuation of the Assessment Monitoring Program with semi-annual sampling scheduled for the first and third quarters of 2021.
- Complete evaluation of analytical data from the downgradient wells, using GWPSs to determine whether an SSL of Appendix IV parameters has occurred.
- Remedy selection will continue; semiannual progress reports required by 40 C.F.R. § 257.97(a) will be completed and posted to the publicly accessible website as required by 40 C.F.R. § 257.107(h)(9).



6. REFERENCES

Natural Resource Technology, an OBG Company (NRT/OBG), 2017a. Sampling and Analysis Plan, Coffeen Ash Pond No. 2, Coffeen Power Station, Coffeen, Illinois, Project No. 2285, Revision 0, October 17, 2017.

Natural Resource Technology, an OBG Company (NRT/OBG), 2017b. Statistical Analysis Plan, Coffeen Power Station, Newton Power Station, Illinois Power Generating Company, October 17, 2017.

OBG, Part of Ramboll (OBG), 2019. Corrective Measures Assessment, Coffeen Ash Pond No. 2 – CCR Unit ID 102, Coffeen Power Station, 134 Cips Lane, Coffeen, Illinois 62017. Illinois Power Generating Company, July 8, 2019.

Ramboll Americas Enginering Solutions, Inc. (Ramboll), 2020. Corrective Measures Assessment Revision 1, Coffeen Ash Pond No. 2 – CCR Unit ID 102, Coffeen Power Station, 134 Cips Lane, Coffeen, Illinois 62017. Illinois Power Generating Company, November 30, 2020.

TABLES

TABLE 1. ANALYTICAL RESULTS - GROUNDWATER ELEVATION AND APPENDIX III PARAMETERS 2020 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

COFFEEN POWER STATION 102 - ASH POND NO. 2 COFFEEN, IL

Well ID	Latitude (Decimal	Longitude (Decimal	Date	Depth to Groundwater (ft)	Groundwater Elevation (ft NAVD88)	Boron, total (mg/L)	Calcium, total (mg/L)	Chloride, total (mg/L)	Fluoride, total (mg/L)	pH (field) (STD)	Sulfate, total (mg/L)	Total Dissolved Solids (mg/L)
	Degrees)	Degrees)		6020A	6020A	6020A	6020A	9251	9214	SM4500 H+B	9036	SM 2540C
			8/5/2019	3.8	622.12							
			8/15/2019			<0.01	54	9.8	0.461	7.1	50	470
G270	39.0665638	-89.3974031	1/20/2020	3.81	622.11							
Background	39.0003030	-69.3974031	1/24/2020			0.015	59	10	0.383	7.3	51	480
			8/10/2020	7.81	618.11							
			8/12/2020			0.1	58	12	0.349	7.1	53	380
			8/5/2019	6.2	620.16							
			8/13/2019			<0.01	140	72	0.546	6.9	310	900
G281	20.0654052	00.2002221	1/20/2020	5.1	621.26							
Background	39.0654052	-89.3993221	1/24/2020			0.011	140	75	0.317	7.3	300	880
			8/10/2020	7.1	619.26							
			8/12/2020			0.037	130	81	0.324	6.9	260	700
			8/5/2019	17.12	608.45							
			8/16/2019			4	550	2.5	<0.25	6.4	4300	3400
			1/20/2020	18.32	607.25							
G401 Downgradient	39.0602586	-89.3952949	1/22/2020			1.1	210	8.6	<0.25	6.0	870	1200
, , , , , ,			5/6/2020	18.55	607.02					5.8		
			8/10/2020	18.8	606.77							
			8/12/2020			4.2	520	2.7	<0.25	5.8	2000	2800
			8/5/2019	9.55	603.82							
			8/16/2019			5.9	270	2.2	0.338	6.8	990	1600
G402	00.0500074		1/20/2020	8.25	605.12							
Downgradient	39.0602071	-89.3917118	1/22/2020			5	250	<5	0.301	7.0	890	1600
			8/10/2020	11.28	602.09							
			8/12/2020			6	250	1.1	0.316	6.8	400	1600
			8/5/2019	4.83	621.64							
			8/19/2019			0.022	77	3.9	0.431	7.0	26	360
G403			1/20/2020	4.84	621.63							
Downgradient	39.0631666	-89.3987788	1/22/2020			0.079	74	4.6	0.468	7.3	33	270
			8/10/2020	5.33	621.14							
			8/12/2020			0.033	76	3.6	0.394	7.0	34	330
	1	1								<u> </u>		1

TABLE 1. ANALYTICAL RESULTS - GROUNDWATER ELEVATION AND APPENDIX III PARAMETERS 2020 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

COFFEEN POWER STATION 102 - ASH POND NO. 2

COFFEEN, IL

Well ID	Latitude (Decimal	Longitude (Decimal	Date	Depth to Groundwater (ft)	Groundwater Elevation (ft NAVD88)	Boron, total (mg/L)	Calcium, total (mg/L)	Chloride, total (mg/L)	Fluoride, total (mg/L)	pH (field) (STD)	Sulfate, total (mg/L)	Total Dissolved Solids (mg/L)
	Degrees)	Degrees)		6020A	6020A	6020A	6020A	9251	9214	SM4500 H+B	9036	SM 2540C
			8/5/2019	4.07	611.6							
			8/16/2019			2.9	110	100	0.323	7.1	170	600
G404	20.0642202		1/20/2020	3.53	612.14							
Downgradient	39.0643292	-89.3924931	1/22/2020			2.9	150	190	0.271	7.2	200	700
			8/10/2020	5.3	610.37							
			8/12/2020			2.8	140	170	<0.25	6.8	190	720
			8/5/2019	5.91	617.72							
			8/20/2019			4.8	140	17	0.794	6.7	340	720
G405	20.064245	00 2062227	1/20/2020	4.35	619.28							
Downgradient		-89.3962337	1/22/2020			8.5	240	10	0.491	7.0	910	1400
			8/10/2020	6.01	617.62							
			8/12/2020			8.9	220	13	0.594	7.0	460	1200

Notes:

40 C.F.R. = Title 40 of the Code of Federal Regulations

ft = foot/feet

mg/L = milligrams per liter NAVD88 = North American Vertical Datum of 1988

S.U. = Standard Units

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4-digit numbers below parameter represent SW-846 analytical methods and alpha-numeric values that begin with SM represent Standard Methods for the Examination of Water and Wastewater.

< = concentration is less than the concentration shown, which corresponds to the reporting limit for the method; estimated concentrations below the reporting limit and associated qualifiers are not provided since not utilized in statistics to determine Statistically Significant Increases (SSIs) over background.</p>

TABLE 2. **ANALYTICAL RESULTS - APPENDIX IV PARAMETERS** 2020 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

COFFEEN POWER STATION 102 - ASH POND NO. 2 COFFEEN, IL

Well ID	Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Cadmium, total (mg/L)	Chromium, total (mg/L)	Cobalt, total (mg/L)	Fluoride, total (mg/L)	Lead, total (mg/L)	Lithium, total (mg/L)	Mercury, total (mg/L)	Molybdenum, total (mg/L)	Radium-226 + Radium 228, total (pCi/L)	Selenium, total (mg/L)	Thallium, total (mg/L)
		6020A	6020A	6020A	6020A	6020A	6020A	6020A	6020A	6020A	6020A	7470A	6020A	6020A	6020A	6020A
	8/15/2019		<0.001	0.04	<0.001	<0.001	<0.004	<0.002	0.461	<0.001	0.012		<0.001	1.34	<0.001	
G270 Background	1/24/2020	<0.003	<0.001	0.038	<0.001	<0.001	<0.004	<0.002	0.383	<0.001	<0.02	<0.0002	<0.001	0.471	0.0014	<0.001
	8/12/2020		<0.001	0.042	<0.001	< 0.001	<0.004	<0.002	0.349	<0.001	<0.02	<0.0002	<0.001	0.248	<0.001	<0.001
	8/13/2019		0.0015	0.091	<0.001	<0.001	0.0048	<0.002	0.546	0.0016	0.014		<0.001	0.879	<0.001	
G281 Background	1/24/2020	<0.003	<0.001	0.07	<0.001	<0.001	<0.004	<0.002	0.317	<0.001	<0.02	<0.0002	<0.001	0	<0.001	<0.001
	8/12/2020		<0.001	0.057	<0.001	<0.001	<0.004	<0.002	0.324	<0.001	<0.02	<0.0002	<0.001	0.304	<0.001	
	8/16/2019		0.016	0.19	0.0015	0.0026	0.058	0.3	<0.25	0.03	0.092	0.00021	0.0027	1.43	0.0046	
G401	1/22/2020	<0.003	<0.001	0.012	<0.001	<0.001	<0.004	0.046	<0.25	<0.001	0.024	<0.0002	<0.001	0.228	<0.001	<0.001
Downgradient	5/6/2020										0.035					
	8/12/2020		<0.001	0.01	<0.001	<0.001	<0.004	0.26	<0.25	<0.001	0.036	<0.0002	<0.001	0.325	<0.001	
	8/16/2019		0.0047	0.036	<0.001	<0.001	0.0062	0.0045	0.338	0.0026	0.046	<0.0002	0.0027	1.96	<0.001	
G402 Downgradient	1/22/2020	<0.003	0.0037	0.025	<0.001	<0.001	<0.004	0.0021	0.301	0.0015	0.026	<0.0002	0.0023	0.48	<0.001	<0.001
	8/12/2020		0.0029	0.024	<0.001	<0.001	<0.004	<0.002	0.316	<0.001	0.022	<0.0002	0.0024	0.787	<0.001	
	8/19/2019		<0.001	0.14	<0.001	<0.001	<0.004	0.0027	0.431	<0.001	<0.01	<0.0002	0.001	1.09	<0.001	
G403 Downgradient	1/22/2020	<0.003	0.0018	0.13	<0.001	<0.001	<0.004	<0.002	0.468	<0.001	<0.02	<0.0002	<0.001	0.3	<0.001	<0.001
	8/12/2020		<0.001	0.12	<0.001	<0.001	<0.004	<0.002	0.394	<0.001	<0.02	<0.0002	<0.001	0.593	<0.001	
	8/16/2019		0.0012	0.05	<0.001	<0.001	<0.004	0.0029	0.323	0.0016	0.013	<0.0002	<0.001	1.79	<0.001	
G404 Downgradient	1/22/2020	<0.003	<0.001	0.033	<0.001	<0.001	<0.004	<0.002	0.271	<0.001	<0.02	<0.0002	<0.001	0.664	<0.001	<0.001
	8/12/2020		<0.001	0.037	<0.001	<0.001	<0.004	<0.002	<0.25	<0.001	<0.02	<0.0002	<0.001	0.853	<0.001	
	8/20/2019		<0.001	0.036	<0.001	<0.001	<0.004	<0.002	0.794	0.0014	<0.01	<0.0002	0.0024	1.75	<0.001	
G405 Downgradient	1/22/2020	<0.003	0.0017	0.03	<0.001	<0.001	<0.004	<0.002	0.491	<0.001	<0.02	<0.0002	0.0016	0.638	<0.001	<0.001
3.22.2	8/12/2020		<0.001	0.022	<0.001	<0.001	<0.004	<0.002	0.594	<0.001	<0.02	<0.0002	0.0013	4.03	<0.001	

40 C.F.R. = Title 40 of the Code of Federal Regulations mg/L = milligrams per liter

NA = Not Analyzed

pCi/L = picoCuries per liter

< = concentration is less than concentration shown, which corresponds to the reporting limit for the method; estimated concentrations below the reporting limit and associated qualifiers are not provided since not utilized in statistics to determine</p> Statistically Significant Levels (SSLs) over Groundwater Protection Standards.

⁴⁻digit numbers below parameter represent SW-846 analytical methods and 3-digit numbers represent Clean Water Act analytical methods.

TABLE 3.

STATISTICAL BACKGROUND VALUES

2020 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

COFFEEN POWER STATION 102 - ASH POND NO. 2

COFFEEN, ILLINOIS

ASSESSMENT MONITORING PROGRAM

Parameter	Statistical Background Value (UPL)				
40 C.F.R. Part 257 A	ppendix III				
Boron (mg/L)	0.02				
Calcium (mg/L)	150				
Chloride (mg/L)	75				
Fluoride (mg/L)	0.483				
pH (S.U.)	6.7 / 7.3				
Sulfate (mg/L)	370				
Total Dissolved Solids (mg/L)	840				

[O: KLT 12/11/19, C: RAB 12/12/19]

Notes:

40 C.F.R. = Title 40 of the Code of Federal Regulations

mg/L = milligrams per liter

S.U. = Standard Units

UPL = Upper Prediction Limit



TABLE 4.

GROUNDWATER PROTECTION STANDARDS

2020 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

COFFEEN POWER STATION 102 - ASH POND NO. 2 COFFEEN, ILLINOIS

ASSESSMENT MONITORING PROGRAM

Parameter	Groundwater Protection Standard ¹							
40 C.F.R. Part 257 Appendix IV								
Antimony (mg/L)	0.006							
Arsenic (mg/L)	0.010							
Barium (mg/L)	2							
Beryllium (mg/L)	0.004							
Cadmium (mg/L)	0.005							
Chromium (mg/L)	0.10							
Cobalt (mg/L)	0.006							
Fluoride (mg/L)	4							
Lead (mg/L)	0.015							
Lithium (mg/L)	0.040							
Mercury (mg/L)	0.002							
Molybdenum (mg/L)	0.10							
Radium 226+228 (pCi/L)	5							
Selenium (mg/L)	0.05							
Thallium (mg/L)	0.002							

[O: KLT 12/11/19, C: RAB 12/12/19]

Notes:

40 C.F.R. = Title 40 of the Code of Federal Regulations

mg/L = milligrams per liter

pCi/L = picoCuries per liter

¹Groundwater Protection Standard is the higher of the Maximum Contaminant Level / Health-Based Level or background.

FIGURES



MONITORING WELL LOCATION MAP COFFEEN ASH POND NO. 2 UNIT ID:102

RAMBOLL AMERICAS ENGINEERING SOLUTIONS, INC.

RAMBOLL

FIGURE 1

BACKGROUND MONITORING WELL LOCATION **DOWNGRADIENT MONITORING WELL LOCATION**

SURFACE WATER FEATURE