April 22, 2021

# EXPERT REPORT ON RELIEF AND REMEDY

SIERRA CLUB, ET AL (COMPLAINANTS) V.
MIDWEST GENERATION, LLC (RESPONDENT)

PREPARED BY



Exhibit 1701

# **Table of Contents**

1	INTRODUC	TION	1
	1.1 Qualifica	tions	1
	1.1.1 Doug	glas G Dorgan, Jr., LPG	1
	1.1.2 Mich	nael B. Maxwell, LPG	2
	1.2 Informat	ion Considered	3
	1.3 Backgrou	und	4
	1.4 Regulato	ry Background/Applicable Definitions	5
	1.4.1 Fede	eral CCR Rules	5
	1.4.2 State	e CCR Rules	6
	1.4.3 Bene	eficial Use of Coal Ash	8
	1.5 Station E	Background	8
	1.5.1 Jolie	t 29 Station	8
	1.5.1.1	Surface Impoundments	9
	1.5.1.2	Historical Fill Areas	10
1.5.2 Powerton Station			10
	1.5.2.1	Surface Impoundments	11
	1.5.2.2	Historical Fill Areas	15
1.5.3 Will County Station			15
	1.5.3.1	CCR Surface Impoundments	16
	1.5.3.2	Historical Fill Areas	18
	1.5.4 Wau	kegan Station	18
	1.5.4.1	CCR Surface Impoundments	18
	1.5.4.2	Historical Fill Area	20

2	IS	SUES WITH QUARLES OPINIONS	21
	2.1	Quarles incorrectly applies the Federal CCR Rules to each Station	. 21
	2.2	Quarles incorrectly concludes that the Federal CCR Surface Impoundments	are
		used for permanent disposal of coal ash	. 21
	2.3	Quarles fails to consider the extensive data record available at each Station	1
			. 21
	2.4	Quarles fails to adequately consider the specific factors used by the Board	
		the basis for a remedy at each Station	. 22
3	RI	EGULATORY FRAMEWORK	23
	3.1	The Federal and State CCR Rules apply to specific units at each Station, no all coal ash present at the Station	
	3.2	The 2012 CCAs at each of the Stations are key compliance mechanisms to have also resulted in collection of a substantial quantity of data useful characterization of environmental conditions and implementation measures to control potential contaminant sources at each Station	for of
4	Al	PPROPRIATE ACTIONS/REMEDY	. 27
	4.1	The Federal/State CCR Surface Impoundments at each Station do not need be investigated further to determine appropriate actions	
	4	4.1.1 Groundwater Conditions at Powerton	. 28
	4	4.1.2 Alternate Source Demonstrations (ASDs)	. 29
		4.1.2.1 Powerton ASD	.30
		4.1.2.2 Will County ASD	.31
		4.1.2.3 Waukegan ASD	
	۷	2.1.3 Testing of Coal Ash Under Beneficial Use Requirements	
		Historical fill areas at each Station do not need to be investigated further	
	7.4	determine appropriate actionsdetermine appropriate actions	
	4	4.2.1 Joliet 29	
		•	

4	2.2 Powerton	38	
4	2.3 Will County	39	
4	2.4 Waukegan	ŀ1	
4.3	analysis of the historical groundwater quality data indicates that groundwat oncentrations are decreasing at the Joliet 29, Powerton, and Will Coun tations.	ty	
4.4	here is no unacceptable risk to offsite receptors at the four Stations	ł5	
4.5	MWG has already committed to following the Federal/State CCR Rules for applicable Existing and Inactive Surface Impoundments at each Station, unticlosure is complete. Therefore, no additional action beyond continued compliance with these Rules is warranted		
4.6	AWG should continue to maintain the GMZs at each Station until the corrective ction is complete		
4.7	1.7 No further remedy is warranted at the Joliet 29, Powerton, and Will Co		
4.8	Despite the absence of risk, an appropriate remedy is warranted at the Vaukegan FS Area to attain compliance with applicable regulations		
4.9	televant Section 33(c) and 42(h) Criteria5	53	
LIST C	FIGURES		
Figure	: Site Layout Map – Joliet 29 Station		
Figure	: Site Layout Map – Powerton Station		
Figure	: Site Layout Map – Will County Station		
Figure	: Site Layout Map – Waukegan Station		
Figure	: Monitoring Well Location Map – Joliet 29 Station		
Figure	: Monitoring Well Location Map – Powerton Station		
Figure	: Monitoring Well Location Map – Will County Station		

Figure 8: Monitoring Well Location Map – Waukegan Station

#### **LIST OF TABLES**

Table 1: Summary of Historical Soil Analytical Data – Joliet 29 Station

Table 2: Summary of Historical Soil Analytical Data – Powerton Station

Table 3: Summary of Historical Soil Analytical Data – Will County Station

Table 4: Summary of Historical Soil Analytical Data – Waukegan Station

#### **APPENDICES**

Appendix A: Resumes

Appendix B: List of References

Appendix C: Statistical Evaluation of Groundwater Data

Appendix D: Comparison of Groundwater Concentrations to Surface Water

Standards

Appendix E: HELP Model

#### 1 INTRODUCTION

Weaver Consultants Group (WCG) has been retained by "Respondent", Midwest Generation, LLC (MWG), to provide its opinions on recommended relief, if any, in the case of Sierra Club, Environmental Law and Policy Center, Prairie Rivers Network, and Citizens Against Ruining the Environment v. Midwest Generation, LLC., and to respond to opinions expressed by Mr. Mark A. Quarles in his expert report (the "Quarles Report"). WCG's opinions in this Report are made to a reasonable degree of scientific certainty. WCG reserves the right to supplement this report, if additional relevant information becomes available.

### 1.1 Qualifications

#### 1.1.1 Douglas G Dorgan, Jr., LPG

Mr. Dorgan's resume and list of publications is presented in **Appendix A**.

I have over 30 years of experience working as an environmental consultant. I have a Bachelor of Science (BS) in Earth Science, with a Minor in Geology, and a Master of Science (MS) in Geography with a Concentration in Environmental Science. I am a Licensed Professional Geologist (PG) in the states of Illinois, Indiana, and Kansas.

Since 1986, my practice has focused on providing consulting services and performing remedial investigation, planning, design, and construction for a wide range of industrial, commercial, and institutional properties. I have been qualified as an expert witness and supported litigation associated with projects involving environmental assessment, design, permitting, and engineering design and construction-related issues. I have also implemented various projects involving compliance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and under various Illinois regulatory programs (e.g., Leaking Underground Storage Tank (LUST), Site Remediation Program (SRP), Tiered Approach to Corrective Action Objectives (TACO)). I have regularly interfaced with both the United States Environmental Protection Agency (USEPA) and the Illinois Environmental Protection Agency (EPA) in many contexts.

I have worked on numerous commercial and industrial properties exhibiting legacy environmental impacts. I have experience assessing and remediating soils and fill material impacted by a wide range of contaminants of concern (COCs). I also have experience supporting environmental investigation and restoration associated with Brownfields redevelopment.

During my career, I have extensive experience:

- 1. Investigating contaminated properties;
- 2. Evaluating appropriate environmental risk mitigation options;
- 3. Designing environmental remediation programs and preparing cost models to support same;
- 4. Managing all aspects of environmental remediation implementation including, but not limited to, developing bid specifications (general and technical), coordinating the bid process and contractor selection, managing implementation of remediation work, and review and approval of contractor pay requests.
- 5. Managing technical consulting services associated with remedial program implementation to assess conformity with project plans and technical criteria.
- 6. Managing documentation of remedial program implementation via project completion reports.

Finally, I have worked on projects involving a range of anthropogenically produced fill materials including coal ash, dredge spoils, slag, and construction/demolition debris. I have supervised closure of Federal CCR regulated ash ponds. I also served as the Principal in Charge for implementation of various elements of the CERCLA Remedial Investigation/Feasibility Study (RI/FS) activities for a northern Indiana Restricted Waste Site (RWS) containing exclusively locally-generated Coal Combustion By-products (CCB).

#### 1.1.2 Michael B. Maxwell, LPG

Mr. Maxwell's resume is presented in **Appendix A**.

I have attained nearly 25 years of experience working in the local Chicagoland area as an environmental consultant with WCG. I have a Bachelor of Arts (BA) in Geological Sciences from the State University of New York, College at Geneseo in 1994 and earned a MS in Geology from the University of Iowa in 1996. My Masters' Thesis involved investigation and characterization of various solid waste products produced in southcentral Iowa, including coal ash, as a means for strip mine remediation. I have been licensed for nearly 20 years as a PG in the states of Illinois and Indiana and am also certified as a Certified Hazardous Materials Manager (CHMM).

I have been practicing environmental consulting in the Chicagoland market since 1996, providing services related to site investigation, remedial investigation, planning, design, and construction

for a wide range of industrial, commercial, and institutional properties. I have implemented various projects involving compliance with the Resource Conservation Recovery Act (RCRA) Subtitle D (solid waste disposal facilities) and Subtitle C (hazardous waste disposal facilities), as well as the 40 CFR 257 Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments (Federal CCR Rules). Additionally, I have implemented various technical projects involving compliance with CERCLA. Since the beginning of my professional practice in 1996, I have regularly applied the SRP regulations and related TACO regulations to a variety of different Illinois sites. I have regularly interfaced with both the USEPA and Illinois EPA on behalf of various industrial clients involving RCRA and alleged violations of the Illinois Environmental Protection Act, including negotiations and compliance with various Compliance Commitment Agreements (CCAs).

I have provided previous testimony before the Illinois Pollution Control Board (Board or IPCB) in connection with an Adjusted Standard Hazardous Waste Delisting Petition that was approved by the Board in 2008. I provided technical assistance and support in a case involving CERCLA liability, cost allocation, appropriateness, and costs associated with the selected remedy related to a former zinc smelter located in downstate Illinois. I have also played the key supporting role in toxic tort and property damage claims related to the historical use of chlorinated solvents at an industrial facility in St. Louis, MO.

I have worked on various different projects involving regulatory compliance/permitting, investigation, and remediation of coal ash surface impoundments, and coal ash fill disposal sites. At one such site in northwest Indiana, I manage the permitting, closure, groundwater monitoring, and corrective action at a restricted waste site (RWS). I have overseen the design and installation of the initial groundwater monitoring system required under the Federal CCR Rules and managed the collection of background groundwater quality data, as well as the statistical evaluation of the groundwater monitoring data at two former coal ash surface impoundment sites in Indiana. I also managed the review of Groundwater Monitoring Reports prepared under the Federal CCR Rules for two former coal ash impoundment sites in northern New Jersey.

#### 1.2 Information Considered

For purposes of this Report, WCG has reviewed the documents presented within the Quarles Report, select publicly available information obtained from the administrative record on the IPCB website (available at https://pcb.illinois.gov/), select publicly available information available concerning MWG on the CCR Rule Compliance Data and Information website (available at:

https://www.nrg.com/legal/coal-combustion-residuals.html) and other information provided by MWG. These sources are listed in **Appendix B**.

## 1.3 Background

MWG owns/operates the following electric generating stations:

- 1. Joliet #29 Generating Station, located in Joliet, IL (Joliet 29);
- 2. Powerton Generating Station, located in Pekin, IL (Powerton);
- 3. Will County Generating Station, located Romeoville, IL (Will County); and
- 4. Waukegan Generating Station, located in Waukegan, IL (Waukegan).

Each of the above facilities have been operated by MWG since 1999, when MWG acquired the Stations from a prior owner. On October 3, 2012, Sierra Club, Environmental Law and Policy Center, Prairie Rivers Network, and Citizens Against Ruining the Environment (collectively, "Complainants") filed a complaint against MWG, alleging that MWG allowed groundwater contamination and open dumping at the above facilities in violation of the Environmental Protection Act (Act) and Board regulations.

The Interim Opinion and Order of the Board dated June 20, 2019, (2019 Board Order) concluded that "it is more probable than not" that MWG violated certain portions of the Act and Board Regulations<sup>1</sup>, identifying areas at each facility. Specifically, the Board found that MWG violated Sections 12(a) and 21(a) of the Act at each of the four Stations. The Section 12(a) violation identified by the Board relates to causing or allowing discharge of coal ash constituents into groundwater causing water pollution. Section 21(a) relates to allowing coal ash to consolidate in fill areas around ash ponds and historical ash storage areas. In addition, the Board found that MWG violated Section 12(d) of the Act (open dumping of coal ash onto the ground) at the Powerton Station (only) by temporarily storing coal ash outside of the surface impoundments on a single occasion.

The 2019 Board Order was reconsidered and modified by a February 6, 2020 Order of the Board (2020 Board Order). Importantly, the subsequent 2020 Board Order found that the Groundwater Management Zones (GMZs) previously established at the Joliet 29, Powerton, and Will County Stations in 2013 had not been terminated and are still in place. With the continued applicability

<sup>&</sup>lt;sup>1</sup> 2019 Board Order, pg. 79.

of the GMZs at the Joliet 29, Powerton and Will County Stations, there are presently no ongoing violations of Part 620 of the Board Regulations<sup>2</sup>.

The 2019 Board Order concluded by indicating that the record up to that point lacks sufficient information to determine the appropriate remedy (in response to the above violations identified by the Board). The Board further indicated that additional hearings were to be held to determine the appropriate relief and any remedy, which will be enacted based upon Sections 33(c) and 42(h) of the Act<sup>3</sup>. Accordingly, WCG's opinions expressed in this Report were developed in consideration of the factors presented in these referenced sections of the Act. These relevant criteria are cited below in Sections 3-4.

## 1.4 Regulatory Background/Applicable Definitions

#### 1.4.1 Federal CCR Rules

The materials managed at the above Stations that are the subject of this litigation are considered coal combustion wastes (CCW) or coal combustion residuals (CCR). CCW is defined in the 2019 Board Order as:

"any fly ash, bottom ash, slag, or flue gas or fluid bed boiler desulfurization by-products generated as a result of the combustion of...coal, or...coal in combination with [other material]."4

CCR is not specifically defined in the 2019 Board Order, but is defined in 40 CFR 257, Subpart D – Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments (Federal CCR Rules). According to 40 CFR 257.53:

"Coal combustion residuals (CCR) means fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers."

CCR has been found at various locations at the four Stations, however, based on MWG's assessment, all of the CCR does not necessarily fall under the same regulations. MWG has concluded that certain areas at the Stations fall under the definition of "existing CCR surface

<sup>&</sup>lt;sup>2</sup> 2020 Board Order, pg. 13.

<sup>&</sup>lt;sup>3</sup> 2019 Board Order, pg. 92-93.

<sup>&</sup>lt;sup>4</sup> 2019 Board Order, pg. 14.

impoundment" pursuant to the Federal CCR Rules. The terms "CCR surface impoundment or impoundment" and "existing CCR surface impoundment", are defined as:

CCR surface impoundment:

"a natural topographic depression, man-made excavation, or diked area, which is designed to hold an accumulation of CCR and liquids, and the unit treats, stores, or disposes of CCR".

Existing CCR surface impoundment:

"a CCR surface impoundment that receives CCR both before and after October 19, 2015, or for which construction commenced prior to October 19, 2015 and receives CCR on or after October 19, 2015".

The Federal CCR Rules also define the term "inactive surface impoundments", as:

"a CCR surface impoundment that no longer receives CCR on or after October 19, 2015 and still contains both CCR and liquids on or after October 19, 2015".

MWG has determined that none of the areas at the MWG Stations are Federal inactive surface impoundments., with the exception of the Former Ash Basin at the Powerton Station.

While some of the CCR at the above facilities is managed in CCR surface impoundments (i.e., ponds), other CCR is not. The Federal CCR Rules also identify another CCR unit, known as a landfill. A "CCR landfill" or "landfill" means:

"an area of land or an excavation that receives CCR and which is not a surface impoundment, an underground injection well, a salt dome formation, a salt bed formation, and underground or surface coal mine, or a cave".

The Federal CCR Rules state that they do not apply to CCR landfills that have ceased receiving CCR prior to October 19, 2015<sup>5</sup>. MWG has concluded that there are no areas at these Stations that fall within the definition of CCR landfill.

#### 1.4.2 State CCR Rules

Illinois has promulged rules related to CCR Surface Impoundments (Illinois Pollution Control Board Case #R20-19). The rulemaking authority is related to Section 22.59 of the Act. In Section 22.59, the General Assembly found that "environmental laws should be supplemented to ensure

<sup>&</sup>lt;sup>5</sup> Preamble to 40 CFR 257, Disposal of Coal Combustion Residuals From Electric Utilities, Final Rule, April 2015.

consistent, responsible regulation of all existing CCR surface impoundments". Section 22.59 of the Act further required that Illinois EPA propose, and the Board adopt, new rules on CCR surface impoundments. Illinois EPA timely filed a rulemaking proposal in March 2020.

The Second Notice of Proposed Rule R20-19, Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments, Proposed New 35 III. Adm. Code 845 was published by the Board on February 4, 2021 (IL CCR Rules). The IL CCR Rules were adopted by the Board on April 15, 2021. These rules are based largely on the Federal CCR Rules, with some modifications, and will also apply to certain CCR surface impoundments at the four Stations. One key difference between the IL CCR Rules and Federal CCR Rules is that the IL CCR Rules include a broader definition of "inactive surface impoundment". The definition of "inactive CCR surface impoundment" under the IL CCR Rules is as follows:

"CCR surface impoundment in which CCR was placed before but not after October 19, 2015 and still contains CCR on or after October 19, 2015."

The Federal definition states that an inactive surface impoundment must contain BOTH CCR and liquids, while the IL definition encompasses units that contain just CCR after the specified date.

The IL CCR Rules do not include CCR Landfills, because CCR disposed in Illinois landfills is already regulated as a solid waste under different regulations. The 35 Ill. Adm. Code 811 landfill regulations (and predecessor 35 Ill. Adm. Code 807 regulations) require solid waste landfill facilities operating (i.e., receiving and disposing of solid waste) after the effective date of the regulations to attain a permit from the Illinois EPA Bureau of Land.

CCR outside regulated surface impoundments has also been included within the scope of this case. The subject of historical unconsolidated coal ash fill areas was raised during the above IL CCR Rules rulemaking. The Board found that regulation of "unconsolidated coal ash fills" was beyond the scope of Section 22.59(g) of the Act, and directed the Clerk to open a sub-docket to R20-19 to explore "historic, unconsolidated coal ash fill in the State", located outside of surface impoundments.

The opinions expressed herein are subject to change, based upon future Illinois regulations pertaining to the above sub-docket to R20-19<sup>6</sup>.

<sup>&</sup>lt;sup>6</sup> The deadline for filing this report did not allow for incorporation of the final Illinois CCR rules, adopted on April 15, 2021, and WCG reserves the right to supplement this report in consideration of the final rules, if necessary.

#### 1.4.3 Beneficial Use of Coal Ash

The Federal CCR rules do not regulate practices that meet the definition of a beneficial use of CCR and the Federal CCR rules do not affect past beneficial uses (i.e., uses completed before the effective date of the rule)<sup>7</sup>. The Act states that CCW is excluded from the definition of "waste" under the Act. "Waste" does not include "coal combustion by-products as defined in Section 3.135." "Coal combustion by-product" or CCB is defined as "coal combustion waste when used beneficially in any of the following ways...". Specific beneficial uses are included in Section 3.135(a), including use as structural fill, foundation backfill, antiskid material, soil stabilization, pavement, or mine subsidence.

As discussed below in support of WCG's opinions, historical Neutral Leaching Extraction Test (NLET) testing was performed by MWG on samples of coal ash removed from the Federal CCR surface impoundments to support beneficial use demonstrations. The comparison of the NLET results to the Illinois Class 1 Groundwater Quality Standards was also utilized to characterize the potential for the coal ash to result in impacts to groundwater. In addition to the NLET testing on the coal ash from the surface impoundments, a substantial amount of NLET testing was performed by MWG at Joliet 29, Powerton, and Will County Stations to characterize the potential for the historical coal ash fill areas to impact groundwater. The data collected from these prior site investigations and related comparisons to the Class 1 Groundwater Quality Standards is also used to support WCG's opinions presented in this Report.

## 1.5 Station Background

#### 1.5.1 Joliet 29 Station

The Joliet 29 Station is located in a primarily industrial area, bordered on the west by a former Caterpillar, Inc. manufacturing facility. The north side of the Joliet 29 Station is bordered by Channahon Road (East James St.), beyond which are the Illinois and Michigan Canal Trail and industrial facilities. Brandon Rd. borders the east side and the Des Plaines River borders the south side of the facility. A site layout map is included as **Figure 1**.

The Station has produced electricity since the mid-1960s. The power plant has been operated by MWG since its acquisition in 1999. On March 18, 2016, the Plant ceased burning coal. On May 26, 2016, Joliet 29 began generating electricity with natural gas. The source of coal utilized by

<sup>&</sup>lt;sup>7</sup> Preamble to 40 CFR 257, Disposal of Coal Combustion Residuals From Electric Utilities, Final Rule, April 2015.

MWG to produce electricity was subbituminous coal sourced from Wyoming's Powder River Basin<sup>8</sup>.

#### 1.5.1.1 Surface Impoundments

Two coal ash surface impoundments (Pond 1 and Pond 2) and one service water basin (Pond 3) were constructed in 1978 with 12-inch thick Poz-o-Pac<sup>TM</sup> dense aggregate liners, which is similar to concrete<sup>9</sup>. Each pond is permitted under the Station's National Pollutant Discharge Elimination System (NPDES) Permit. During historical operations, most of the bottom ash produced at the Joliet 29 Station was conveyed across the Des Plaines River to an off-site permitted landfill<sup>10</sup>. On rare occasions when the enclosed pipe system was offline, bottom ash was pumped to either Pond 1 or Pond 2, where it was temporarily staged, until it could be removed for disposal at the off-site permitted landfill. Water from Pond 1/Pond 2 flowed to Pond 3, which was used exclusively as a finishing pond and received a *de minimis* quantity of coal ash<sup>11</sup>.

Ponds 1 and 2 were relined in 2008. The new liners consisted of the following, from the bottom up: a bottom geotextile cushion layer placed on top of the Poz-o-Pac<sup>TM</sup>, 60-mil high-density polyethylene (HDPE) geomembrane liner, a top geotextile cushion, a 12 inch thick sand cushion layer, and 6 inch thick limestone warning layer. The bottom elevation of Pond 2 is approximately 516 feet (ft.) above mean sea level (MSL). The highest recorded groundwater elevations since June 2011 in the vicinity of Pond 2 (i.e., in MW-03, MW-04, MW-05 and MW-10) ranged from approximately 511.5 ft. MSL at MW-05 and 511.8 ft. MSL at MW-10 (both data points observed in May 2020). The average groundwater elevation in the vicinity of Pond 2 between June 2011 and October 2020 was approximately 506.0 ft. MSL.

Coal ash was removed from Pond 1 and MWG cleaned Pond 1 prior to October 12, 2015<sup>12</sup>. Coal ash from Pond 2 was removed by November 22, 2019 and is in the process of being closed as soon as a permit is received<sup>13</sup>. The Pond 3 Finishing Pond was relined in 2013, and never received CCR<sup>14</sup>.

<sup>&</sup>lt;sup>8</sup>Joint Agreed Stipulations (JAS), Oct. 2, 2017, 51.

<sup>&</sup>lt;sup>9</sup> JAS, Oct. 2, 2017, 5.

<sup>&</sup>lt;sup>10</sup> 1/29/18, Tr. pg. 192-194 (Test. of Race).

<sup>&</sup>lt;sup>11</sup> JAS, Oct 2, 2017, 10; 1/29/18 Tr. pg. 188-191 (Test. of Race).

<sup>&</sup>lt;sup>12</sup> JAS, Oct 2, 2017, 12.

<sup>&</sup>lt;sup>13</sup> Annual CCR Fugitive Dust Control Report, Joliet #29 Generating Station, December 10, 2020, pg. 2.

<sup>&</sup>lt;sup>14</sup> 1/29/18 Tr. at 188-191 (Test. of Race).

Based on the Federal CCR Rules, MWG has determined that Pond 1 at Joliet 29 is not a Federal CCR Surface Impoundment, because it did not contain CCR after October 19, 2015. Pond 3 never received an accumulation of CCR, so MWG determined Pond 3 is not a Federal CCR surface impoundment. In 2020, MWG conducted a multi-layered analysis of the contents of Pond 1 and Pond 3, including a bathymetric survey of the base of the ponds and an analysis of the material found at the base of the ponds. The analysis demonstrated that the material in the ponds was not CCR. Instead, it was a mixture of biologic material, as well as sand and silt, air deposits, and stormwater runoff. MWG has determined that Pond 2 is considered a Federal CCR Surface Impoundment because CCR and water was present in this surface impoundment after October 19, 2015. MWG removed the CCR from Pond 2 in 2019, and, under the IL CCR Rules, closure will be completed when a permit is issued by Illinois EPA, pursuant to the IL CCR Rules.

#### 1.5.1.2 Historical Fill Areas

In addition to coal ash surface impoundments, according to the case record, three other areas at Joliet 29 Station are suspected to contain historical coal ash. One is in the northeastern portion of the facility, one is on the southwest side, and one is northwest of the former coal pile<sup>16</sup>. As presented in further detail in the sections below presenting WCG's opinions, some of these areas have been historically investigated. Based on the results from prior site investigation activities, in some areas, coal ash was excavated and hauled to an appropriately permitted landfill, as a remedial measure. These areas did not receive coal ash after October 19, 2015 and were not operated as units meeting the definition of a Federal CCR surface impoundment and therefore MWG has not included them within the scope of the Federal CCR Rules.

#### 1.5.2 Powerton Station

The Powerton Station is a 1,710-acre property located at 13082 East Manito Road in Pekin, Tazewell County, Illinois. The plant is bordered on the north by the Illinois River, Powerton Lake and Wildlife Area to the west, industrial and residential areas to the east, and agricultural land to the south. A site layout map is included as **Figure 2**.

Powerton has been operating as a generating station since the 1920s. Historically, operations were conducted with four coal-fired units; however, these units were replaced in the early 1970s

<sup>&</sup>lt;sup>15</sup> MWG13-15 79325-79340.

<sup>&</sup>lt;sup>16</sup> 2019 Board Order, pg. 26.

by the currently operating Units 5 and 6. The source of coal to produce electricity at Powerton is subbituminous coal sourced from Wyoming's Powder River Basin<sup>17</sup>.

#### 1.5.2.1 Surface Impoundments

Various basins either historically or currently used to treat/manage materials are present at the Powerton Station, including:

- Ash Surge Basin;
- Bypass Basin;
- Metal Cleaning Basin;
- Secondary Settling Basin/Service Water Basin;
- Former Ash Basin;
- Limestone Runoff Basin; and
- East Yard Runoff Basin.

The Ash Surge Basin is the primary basin used for the collection of ash at the Powerton Station. The Ash Surge Basin was constructed in 1978 with at least a 12-inch Poz-o-Pac<sup>™</sup> liner on the bottom topped with a bituminous seal coat and a Hypalon® liner on the sides of the basin <sup>18</sup>. The Ash Surge Basin was relined in 2013 with a bottom geotextile cushion layer placed on top of the Poz-o-Pac<sup>™</sup>, 60-mil HDPE geomembrane liner, a top geotextile cushion, a 12-inch-thick sand cushion layer, and 6-inch-thick limestone warning layer <sup>19</sup>. The bottom elevation of the Ash Surge Basin is 452 ft. MSL <sup>20</sup>. The highest recorded groundwater elevations since September 2011 in the vicinity of the Ash Surge Basin ranged between approximately 446.8 ft. MSL at MW-18 in May 2017 and 449.4 ft. MSL at MW-15 in May 2013. The average groundwater elevation in the vicinity of the Ash Surge Basin between September 2011 and December 2020 was approximately 445.2 ft. MSL.

The Bypass Basin is used only when the Ash Surge Basin is being emptied<sup>21</sup>. The Bypass Basin was constructed in 1978 with a Poz-o-Pac<sup>™</sup> liner on the bottom and a Hypalon<sup>®</sup> liner on the

<sup>&</sup>lt;sup>17</sup> JAS, Oct. 2, 2017, 51.

<sup>&</sup>lt;sup>18</sup> JAS, Oct. 2, 2017, 20; MWG Exhibit 901, pg. 28.

<sup>&</sup>lt;sup>19</sup> Id.

<sup>&</sup>lt;sup>20</sup> Id at 30.

<sup>&</sup>lt;sup>21</sup> 1/31/18 Tr. p. 75:20-23 and 75:16-19; Exh. 667, p. 12; MWG Ex. 901, p. 27-28; 1/30/18 Tr. p. 58:13-18 and p. 59:17-21; JAS, Oct. 2, 2017, 30.

sides. The Bypass Basin was relined in 2010 with 12 inches of Poz-o-Pac<sup>™</sup> on the bottom, a bottom geotextile cushion, a 60 mil HDPE liner, a top geotextile cushion, a sand cushion, and a limestone warning layer<sup>22</sup>. The pond's bottom elevation is at 459 ft MSL<sup>23</sup>. The highest recorded groundwater elevation since September 2011 in the vicinity of the Bypass Basin was 452.8 ft. MSL at MW-12 in February 2020, and the average groundwater elevation in the vicinity of the Bypass Basin between September 2011 and December 2020 was approximately 450.4 ft. MSL.

The Metal Cleaning Basin is not a part of the ash sluice system and instead is used during outages in at the Station as a temporary lay-down area for dry ash cleaned out of the boiler tubes<sup>24</sup>. The Metal Cleaning Basin was constructed in 1978 with a 12-inch Poz-o-Pac<sup>TM</sup> liner on the bottom and a Hypalon® liner on the sides<sup>25</sup>. The Metal Cleaning Basin was relined in 2010 with 12 inches of Poz-o-Pac<sup>TM</sup> on the bottom, a bottom geotextile cushion, a 60 mil HDPE liner, a top geotextile cushion, a sand cushion, and a limestone warning layer<sup>26</sup>. The bottom elevation of the pond is 457.5 ft. MSL. In addition to use for the temporary lay-down of ash, the Metal Cleaning Basin occasionally holds process water. The Metal Cleaning Basin does not receive commingled ash and process water<sup>27</sup>.

The highest recorded groundwater elevation since April 2011 in the vicinity of the Metal Cleaning Basin (i.e., from MW-13, MW-14, MW-15, and MW-17) ranged from approximately 449.0 ft. MSL at MW-17 in April 2019 and 450.1 ft. MSL at MW-14 in March 2018. The average groundwater elevation in the vicinity of the Metal Cleaning Basin between April 2011 and December 2020 was approximately 445.6 ft. MSL.

The Secondary Settling Basin/Service Water Basin is used as a finishing pond and receives *de minimis* ash from the Surge Basin<sup>28</sup>. Since before 1999, the Service Water Basin had a Hypalon® liner. The pond was relined in 2013 with a geotextile separator fabric, gravel underdrain system 18-24 inches thick, another geotextile separator fabric, a sand cushion layer, a bottom geotextile cushion, and a 60 mil HDPE liner<sup>29</sup>. Because the Service Water Basin would not be cleaned out,

<sup>&</sup>lt;sup>22</sup> MWG Exhibit 901, pg. 28.

<sup>&</sup>lt;sup>23</sup> Id at 31.

<sup>&</sup>lt;sup>24</sup> Id at 28.

<sup>&</sup>lt;sup>25</sup> Id.

<sup>&</sup>lt;sup>26</sup> MWG Exhibit 901, p. 28.

<sup>&</sup>lt;sup>27</sup> Interview with Sharene Shealey, MWG Director, Environment, April 19, 2021.

<sup>&</sup>lt;sup>28</sup> 2019 Board Order at 3(A)(ii).

<sup>&</sup>lt;sup>29</sup> MWG Exhibit 901, pg. 28.

no cushion or warning layer above the HDPE was necessary<sup>30</sup>. The pond's bottom elevation is at 440 ft. MSL. Average groundwater elevation is at 441.5 feet (about 1.5 ft above the pond's bottom)<sup>31</sup>. To address higher groundwater levels in the area, MWG installed an underdrain system beneath the Service Water Basin<sup>32</sup>. The purpose of the underdrain system, composed of stone, drain tiles, and riprap on the sides, is to divert water that may seep into the ground near the pond, away from the pond liner<sup>33</sup>. In 2020, MWG conducted a multi-layered analysis of the contents of the Service Water Basin, including a bathymetric survey of the base of the basin and an analysis of the material found within the basin. The analysis demonstrated that there was little to no material that had accumulated in the basin and that the material in the basin was not CCR. Instead, it was sand and silt from air deposition and stormwater runoff.<sup>34</sup>

Located to the northeast of the existing Ash Surge Basin, the Former Ash Basin is an inactive CCR surface impoundment which was historically used for bottom ash management prior to MWG's operations at the Station<sup>35</sup>. The Former Ash Basin is part of the Station's NPDES permit solely as an emergency overflow for the Ash Surge Basin<sup>36</sup>. Originally a single pond, in 2010 the Former Ash Basin was bisected into two areas by construction of a railroad embankment<sup>37</sup>. The two bisected ponds are now designated as the North Pond and South Pond<sup>38</sup> and are shown on **Figure 2**.

The Limestone Runoff Basin, located directly east of the Ash Surge Basin, is lined on the bottom with a Poz-o-Pac<sup>TM</sup> liner and also had a Hypalon® liner on the sides<sup>39</sup>. The Limestone Runoff Basin has been used on two occasions to temporarily store coal ash when equipment changes occurred at the Station and there was an immediate need for a lined storage space<sup>40</sup>. The last time was in 2013, when the Station was relining the Ash Surge Basin and the Secondary Ash Basin, and since that time the basin has been empty and not used<sup>41</sup>.

<sup>&</sup>lt;sup>30</sup> 1/31/18 Tr. p. 135:10-18.

<sup>&</sup>lt;sup>31</sup> MWG Exhibit 901, pg. 28.

<sup>&</sup>lt;sup>32 32</sup> MWG Exh. 710; MWG13-15\_34265; 1/31/18 Tr. p. 132:11-12 (Test. of Kelly).

<sup>&</sup>lt;sup>33</sup> 1/31/18 Tr. p. 133:2-10; MWG Ex. 710; MWG13-15 34265.

<sup>&</sup>lt;sup>34</sup> MWG13-15\_79325-79340.

<sup>&</sup>lt;sup>35</sup> 1/31/18 Tr. p. 141:19-23 (Test. of Kelly); MWG Exh. 667, p. 15; MWG Ex. 901, p. 38.

<sup>&</sup>lt;sup>36</sup> MWG Exh. 901 at 38; 1/30/18 Tr. at 2:14-18 (Test. of Race).

<sup>&</sup>lt;sup>37</sup> Geosyntec Consultants, History of Construction Former Ash Basin, dated April 2018.

<sup>&</sup>lt;sup>38</sup> Id.

<sup>&</sup>lt;sup>39</sup> MWG Exh. 667, p. 15; JAS 31; 1/31/18 Tr. p. 144:12-145:1 (Test. of Kelly).

<sup>&</sup>lt;sup>40</sup> 1/31/18 Tr. p. 144:2-6 (Test. of Kelly); 1/30/18 Tr. p. 70:2-7 (Test. of Race).

<sup>&</sup>lt;sup>41</sup> 1/31/18 Tr. p. 144:7-145:1. (Test. of Kelly).

The East Yard Runoff Basin is located southwest of the Ash Surge Basin and west of the Bypass Basin and is not part of the ash sluicing system, nor used by MWG to store or receive ash<sup>42</sup> (see **Figure 2**). The East Yard Runoff Basin is used for stormwater runoff from the east half of the property at the Station<sup>43</sup>.

Based on the Federal CCR Rules, MWG considers the Ash Surge Basin and the Bypass Basin to be Federal CCR Surface Impoundments because they have been used to temporarily accumulate CCR and liquid after October 19, 2015. In addition, MWG considers the Former Ash Basin to be a Federal CCR Surface Impoundment because, although it is inactive and CCR ceased being sent to the Former Ash Basin prior to MWG's operations at the Station, CCR and water were present in this surface impoundment after October 19, 2015. In addition, MWG considers the Metal Cleaning Basin to be an Illinois Surface Impoundment, because it contained CCR materials after October 19, 2015. The Limestone Runoff Basin, Service Water Basin, and East Yard Runoff Basins are not considered Federal or Illinois Surface Impoundments, because none of the basins accumulated coal ash materials and liquid<sup>44</sup>.

The most recent technical document pertaining to the Federal CCR surface impoundments at the Powerton Station was submitted to USEPA in late 2020. On November 30, 2020, MWG submitted a Demonstration for a Site Specific Alternative Deadline to Initiate Closure (a/k/a Alternative Closure Demonstration (ACD)) under the Federal CCR Rule for the Ash Surge Basin and Bypass Basin due to the infeasibility for the development of alternative capacity for CCR at Powerton <sup>45</sup>. In accordance with the Federal CCR rules, Powerton must cease placing the CCR and non-CCR waste streams sent to the Ash Surge Basin and Bypass Basins as soon as technically feasible but no later than April 11, 2021, unless an alternate schedule is approved by the EPA, as the Basins do not meet the liner design requirements of the Federal CCR Rules.

This ACD proposes to cease sending CCR and non-CCR waste streams to the Bypass Basin after April 11, 2021. The ACD also proposes a workplan for the development of alternate disposal capacity to replace the Ash Surge Basin. This workplan calls for implementation of a multiple technology system (MTS) to address CCR and non-CCR waste streams being managed within the Ash Surge Basin. The system is proposed to consist of refurbished dewatering bins, a new

<sup>&</sup>lt;sup>42</sup> MWG Exh. 254 at 4; 1/31/18 Tr. at 138:5-22 (Test. of Kelly); MWG Exh. 667 at 12.

<sup>&</sup>lt;sup>43</sup> MWG Exh. 710, MWG13-15\_34265 (Construction Documentation of the Secondary Ash Basin Liner Replacement); 1/31/18 Tr. p. 132:11-12 (Test. of Kelly).

<sup>&</sup>lt;sup>44</sup>1/31/18 Tr. at 138:5-22 (Test. of Kelly); MWG13-15 48645; MWG13-15 48742; MWG Exh. 711.

<sup>&</sup>lt;sup>45</sup> Sargent & Lundy, Demonstration for a Site-Specific Alternative Deadline to Initiate Closure, November 30, 2020.

concrete ash-settling tank, a new Recycle Cooling Water Basin, and a new Low-Volume Waste Basin. The MTS will be developed in two phases. The first phase will bring Powerton into compliance with the Federal CCR Rule and will set up the second phase which will bring the Station into compliance with the EPA's recently-revised effluent limitation guidelines for steam electric power generating stations (ELG Rule). To allow for sufficient time for the design and installation of the modified treatment system, the ACD requests USEPA allow the Ash Surge Basin to continue receiving CCR and non-CCR waste streams until August 11, 2023. WCG understands that the ACD is under review by USEPA.

#### 1.5.2.2 Historical Fill Areas

In addition to the CCR surface impoundments, there are other areas of the Powerton Station that are known or suspected to have had or currently contain coal ash and have been referred to in the record as the historical coal ash fill areas.

As described in Section 1.3 above, the 2019 Board Order found that MWG was in violation of Section 12(d) of the Act due to the temporary storage of cinders stored on the ground in an open area directly south of the Bypass Basin for "two to three months" during the "winter before 2012"<sup>46</sup>. MWG subsequently removed the cinders within two to three months<sup>47</sup>.

The Quarles Report also identified two "suspected" disposal areas between the intake and discharge channels (noting that this area was not previously recognized by the Board) and underlying the area to the southeast of the power plant. The Quarles Report fails to present the basis for the conclusion that there are additional, unrecognized historical ash management areas. Based on a review of historical aerials and topographic maps, WCG's was unable to independently substantiate Quarles' characterization of these two suspected disposal areas.

#### 1.5.3 Will County Station

The Will County Station began producing power in 1955, with four coal-fired electric generating units. Units 1-3 were deactivated between 2010 and 2015, which leaves only one active unit (Unit 4) as of the date of this report. As was the case with the other Stations, the Powder River Basin in Wyoming is also the source of coal burned by MWG at the Will County Station<sup>48</sup>.

<sup>&</sup>lt;sup>46</sup> 2019 Board Order, pg. 42.

<sup>&</sup>lt;sup>47</sup> 1/31/18 Tr. at 185:14-16 (Test. of Kelly).

<sup>&</sup>lt;sup>48</sup> 2019 Board Order, pg. 20.

The Will County Station is bordered on two sides by surface water features. The Chicago Sanitary and Ship Canal (CSSC) is located to the east of the plant and the Des Plaines River borders the plant on the west. The Station is bordered on the north by Romeo Road and on the south by Hanson Materials (f/k/a Materials Services Corp.). A site layout map is included as **Figure 3**.

#### 1.5.3.1 CCR Surface Impoundments

Four CCR surface impoundments are located at the Will County Station. Ponds 1N, 1S, 2S, and 3S are each permitted under the Station's NPDES Permit<sup>49</sup>. The above four ponds were constructed in 1977, with 24-36 inches of Poz-o-Pac<sup>TM</sup> liner. Only Ponds 2S and 3S are presently used as part of Station operations. They are used interchangeably. While one of the ponds is in service, the other is designated for cleaning, which generally occurs approximately on an annual basis<sup>50</sup>.

When they were part of the facility coal ash treatment system, Ponds 1N and 1S collected bottom ash fines from Units 1 and 2 at the Will County Station<sup>51</sup>. Units 1 and 2 were shut down in 2010 and Ponds 1N and 1S were removed from service at that time<sup>52</sup>. A dewatering system has been installed at Ponds 1N and 1S that is designed to maintain no more than 1 ft. of water in the ponds<sup>53</sup>.

The liner for Pond 3S was installed in 2009. The new liner consisted of the following, from the bottom up: a bottom geotextile cushion layer placed on top of the Poz-o-Pac<sup>™</sup>, 60-mil HDPE geomembrane liner, a top geotextile cushion, a 12" thick sand cushion layer, and 6" thick limestone warning layer. Pond 2S was upgraded with a similar liner system in 2013. Due to the smaller size of the pond, MWG also installed a geocell on the sideslopes of Pond 2S<sup>54</sup>. The purpose of the geocell was for additional protection of the liner during operation and cleanup in the pond.

The bottom elevation of Pond 2S and Pond 3S is 582.5 ft. MSL<sup>55</sup>. The highest recorded groundwater elevations since June 2011 in the vicinity of Ponds 2S and 3S (i.e., from MW-05, MW-06, MW-09, MW-10, MW-11, and MW-12) ranged between approximately 581.6 ft. MSL at

<sup>&</sup>lt;sup>49</sup> NPDES Permit No. IL0002208.

<sup>&</sup>lt;sup>50</sup> JAS, Oct 2, 2017, 47.

<sup>&</sup>lt;sup>51</sup> JAS, Oct 2, 2017, 48 and 1/31/18 Tr. p. 253 (Test. of Veenbaas).

<sup>&</sup>lt;sup>52</sup> JAS, Oct 2, 2017, 50; 10/24/18 Tr. p. 276 (Test. of Maddox); 1/30/18 Tr. p. 254 (Test. of Race).

<sup>&</sup>lt;sup>53</sup> Compliance Commitment Agreement, Will County, Oct 24, 2012.

<sup>&</sup>lt;sup>54</sup> MWG Exhibit 901, p. 61.

<sup>&</sup>lt;sup>55</sup> Id.

MW-12 in May 2019 and 584.1 ft. MSL at MW-05 in May 2019. The average groundwater elevation in the vicinity of Ponds 2S and 3S between June 2011 and November 2020 was approximately 581.4 ft. MSL.

Based on the Federal CCR Rules, MWG considers Ponds 2S and 3S at Will County to be Federal CCR Surface Impoundments, as they meet the definition of surface impoundment and contained CCR and liquids after October 19, 2015. Because of the dewatering system previously installed at Ponds 1S and 1N prior to 2015, they do not contain both CCR and liquids after 2015 and MWG determined they are not covered under the Federal CCR Rules. Based on the Illinois definition, Ponds 1S and 1N are considered Illinois CCR Surface Impoundments, because they meet the definition of an inactive CCR surface impoundment and contained CCR materials after October 19, 2015.

The most recent technical document pertaining to the Federal CCR surface impoundments at the Will County Station was submitted to USEPA in late 2020. MWG submitted an ACD under the Federal CCR Rules (40 CFR 257.103) to USEPA on November 30, 2020 addressing Ponds 2S and 3S<sup>56</sup>. The ACD was submitted because Pond 2S and Pond 3S do not meet the liner design criteria or uppermost aquifer location criteria under the Federal CCR Rule, but the Will County Station does not have an alternative capacity for CCR.

The ACD for the Will County Station proposes to cease sending CCR and non-CCR waste streams to Pond 3S after April 11, 2021 and subsequently clean close Pond 3S. The ACD also proposes a workplan for the development of alternate disposal capacity to replace Pond 2S. This workplan calls for implementation of a multiple technology system (MTS) to address CCR and non-CCR waste streams being managed within Pond 2S. The system is proposed to consist of a remote submerged scraper conveyor (SSC) for the CCR waste streams and a new Low Volume Waste Basin for the Station's non-CCR waste streams managed at Pond 2S. The MTS will be developed in two phases. The first phase will separate the CCR and non-CCR waste streams that are currently commingled and then the second phase will convert the Station's bottom ash-handling system into a closed-loop system. To allow for sufficient time for the design and installation of the modified treatment system, the ACD requests USEPA allow Pond 2S to continue receiving CCR waste streams until July 23, 2023 and non-CCR waste streams until April 28, 2023. WCG understands that the ACD is under review by USEPA.

<sup>&</sup>lt;sup>56</sup> Sargent & Lundy, Demonstration for a Site-Specific Alternative Deadline to Initiate Closure, Will County Generating Station, November 30, 2020.

#### 1.5.3.2 Historical Fill Areas

In addition to the above coal ash surface impoundments, other areas at the Will County Station are suspected or known to contain historic coal ash and have been included in the case record. These areas include: 1) fill areas around coal ash surface impoundments and 2) an alleged former coal ash placement area in the southeastern portion of the Station. These areas have been investigated and the data collected during these historical environmental investigations has assisted with development of WCG's opinions expressed within this Report.

#### 1.5.4 Waukegan Station

The Waukegan Station is a 194-acre property located at 401 East Greenwood Avenue, Waukegan, Lake County, Illinois. The station has been operating since 1923 with five coal-fired units, later expanded to eight units. The Station currently has two active units that have been in operation since 1958 and 1962. MWG has owned and operated that Station since 1999. As was the case with the other Stations, the Powder River Basin in Wyoming is also the source of coal burned by MWG at the Waukegan Station<sup>57</sup>. A Site Layout Map is included as **Figure 4**.

The surrounding area has been utilized for industrial purposes since the 1930s. Bordered to the north by Johns Manville Company Superfund site; North Shore Sanitary District to the south with Johnson Marine Plant Superfund site beyond; to the east by Lake Michigan; and to the west by the former General Boiler Company and former Greiss-Pfleger Leather Tanning Facility. Both the former General Boiler Company and the former Greiss-Pfleger Leather Tanning Facility area are located upgradient of the Waukegan Station.

#### 1.5.4.1 CCR Surface Impoundments

The Waukegan Station has two ash ponds, East Pond and West Pond, located on the southern side of the Station, and operated as part of the Station's NPDES permitted system<sup>58</sup>. The East Pond and West Pond are "U-shaped" and were constructed in 1977 with a Hypalon<sup>®</sup> liner<sup>59</sup>. The East Pond and West Pond alternate receiving bottom ash, thus only one pond (East Pond or West Pond) is in service at a time<sup>60</sup>. Additionally, typically the bottom ash settles out on the influent

<sup>&</sup>lt;sup>57</sup> 2019 Board Order, pg. 20.

<sup>&</sup>lt;sup>58</sup> MWG Ex. 901, p. 45, 46; MWG Ex. 667, p. 20; MWG Ex. 642;1/30/18 Tr. p. 120:4-18 (Test. of Race).

<sup>&</sup>lt;sup>59</sup> JAS 34; MWG Ex. 901, p. 45, 46; 1/31/18 Tr. p. 225:22-226:4 (Test. of Veenbaas); MWG Ex. 901, p. 45.

<sup>&</sup>lt;sup>60</sup> JAS 37; 10/24/17 Tr. p. 162:3-6 (Test. of Lux); 1/30/18 Tr. p. 118:13-18 (Test. of Race); 1/31/18 Tr. p. 230 (Test. of Veenbaas).

side of the "U" of the pond, and the opposite side of the "U" typically only contains water and a small quantity of bottom ash<sup>61</sup>.

MWG replaced the liner at the East Ash Pond in 2003 with a 60 mil HDPE liner and replaced the West Ash Pond a year later in 2004<sup>62</sup>. The East and West Ponds liner system includes a prepared subgrade, HDPE liner, a sand cushion and limestone warning layer<sup>63</sup>. The bottom elevation of the CCR surface impoundments is 585 ft. MSL<sup>64</sup>. The highest recorded groundwater elevation since June 2011 in the vicinity of the Waukegan ash ponds (i.e., from MW-01, MW-02, MW-03, MW-04, MW-05, MW-07, and MW-16) ranged from approximately 584.2 ft. MSL at MW-01 in May 2019 and MW-16 in November 2019 to 584.6 ft. MSL at MW-05 in May 2018. The average groundwater elevation in the vicinity of the ash ponds between June 2011 and November 2020 was approximately 582.0 ft. MSL.

Based on the Federal CCR Rules, MWG considers the East and West Ash Ponds at Waukegan to be Federal CCR Surface Impoundments, as they meet the definition of surface impoundment and contained CCR after October 19, 2015.

MWG has prepared an ACD for the Waukegan Station, as neither the East Ash Pond nor the West Ash Pond meet the liner design criteria required by the Federal CCR Rules<sup>65</sup>. Under the Federal CCR Rules, Waukegan must cease placing CCR and non-CCR waste streams into the East and West Ash Ponds as soon as technically feasible, but no later than April 11, 2021, unless an alternative deadline is granted by the EPA in accordance with 40 CFR 257.103. Because the Station does not need to have both of its CCR surface impoundments in service to operate – and pursuant to the revised Federal CCR Rule – Waukegan will not send CCR or non-CCR waste streams to the West Ash Pond after April 11, 2021 and does not plan on sending any waste streams to that basin in the interim. After evaluating several on- and off-site alternative disposal solutions for the waste streams currently managed within the East Ash Pond (both permanent and temporary), MWG has concluded that no alternative disposal capacity is available for these waste streams. Further, it is technically infeasible to obtain alternative disposal capacity for these waste streams on- or off-site by April 11, 2021.

<sup>&</sup>lt;sup>61</sup> 10/24/17 Tr. p. 163:15-24 (Test. of Lux); 1/31/18 Tr. p.235:4-10 (Test. of Veenbaas); 2/2/18 Tr. p. 82:15-83:4 (Test. of Seymour).

<sup>&</sup>lt;sup>62</sup> JAS 35, 36; MWG Ex. 901, p. 46.

<sup>63</sup> MWG Exh. 901, pg. 46.

<sup>&</sup>lt;sup>64</sup> MWG Exh. 901, pg. 47.

<sup>&</sup>lt;sup>65</sup> Sargent & Lundy, Demonstration for a Site-Specific Alternative Deadline to Initiate Closure, November 30, 2020

As described in the ACD, MWG is proposing to install a multiple technology system, consisting of a remote SSC for Waukegan's CCR waste streams and construct a new Low Volume Waste Pond for the Station's non-CCR waste streams that are currently being managed by the East Ash Pond. This multiple technology system will be developed in two phases. The first phase will bring Waukegan into compliance with the Federal CCR Rule and will separate the CCR and non-CCR waste streams that are currently being commingled in the East Ash Pond. This will set up the second phase in which MWG will bring the Station into compliance with the EPA's recently revised effluent limitation guidelines for steam electric power generating stations (ELG Rule) by converting Waukegan's bottom ash-handling system into a closed-loop system.

This proposed multiple technology solution to replace the East Ash Pond will be installed in accordance with the Federal CCR Rule and with the Illinois EPA's forthcoming regulations and permit program for CCR surface impoundments. Pursuant to the Illinois Public Act authorizing the Illinois EPA to prepare and the Illinois Pollution Control Board to adopt the Final Illinois CCR Rule, MWG cannot "close any CCR surface impoundment without a permit granted by the [Illinois EPA]." To allow for sufficient time for the design and installation of the modified treatment system, the ACD requests USEPA allow the East Ash Pond to continue receiving the noted CCR waste streams until October 11, 2023 and the noted non-CCR waste streams until June 16, 2023. WCG understands the ACD is under review by USEPA.

#### 1.5.4.2 Historical Fill Area

In addition to the above coal ash surface impoundments, the Former Slag Area (FS Area), located to the west of the West Pond, is reported to contain historical coal ash that was placed before 1998<sup>66</sup>. This area has been investigated as part of work performed by MWG<sup>67</sup>. The presence of coal ash has also been noted at certain areas outside of the surface impoundments during geotechnical investigations. The data collected during these environmental investigations has assisted with development of WCG's opinions expressed within this Report.

<sup>&</sup>lt;sup>66</sup> 2019 Illinois Pollution Control Board Order at 66-67.

<sup>&</sup>lt;sup>67</sup> MWG 13-15 79493-79771; MWG 13-15 81195-81293.

## 2 ISSUES WITH QUARLES OPINIONS

## 2.1 Quarles incorrectly applies the Federal CCR Rules to each Station.

The conclusions of the Quarles report are presented in three primary sections, containing Mr. Quarles' opinions with respect to contaminant sources, nature and extent of potential contamination, and potential remedies for the Stations. Mr. Quarles draws heavily from the 2019 Interim Opinion and Order of the Board, resulting in a Report that presents little independent analysis of the extensive Station-specific information developed to date through historical investigation prior to MWG's operation of the Stations, voluntary implementation of the CCAs entered with Illinois EPA, compliance with the 2015 Federal CCR Rules, and on-going investigative activities. He also ignores the Board's February 2020 Opinion and Order that significantly modifies the 2019 Opinion and Order. There should be a distinction made between areas of the Stations that are subject to the Federal CCR Rules (40 CFR 257) and/or the IL CCR Surface Impoundment regulations (35 III. Adm. Code 845) and those areas of the Stations which are not subject to those regulations. Quarles attempts to apply the regulatory requirements of the Federal CCR Rules to the entirety of the Stations, including both the Federal CCR regulated units and the historical fill areas. Quarles did not mention the IL CCR Rules, which were under review by the Board as of the date of the Quarles Report. Certain surface impoundments fall under the Federal CCR Rules, while others fall under the IL CCR Rules. The specific areas at each Station covered under the Federal and IL CCR Rules was discussed above in Section 1.5.

# 2.2 Quarles incorrectly concludes that the Federal CCR Surface Impoundments are used for permanent disposal of coal ash.

Quarles indicates that the CCR surface impoundments at the Stations are intended for permanent disposal of coal ash. However, each of the CCAs signed by MWG with Illinois EPA clearly state that the active surface impoundments are temporary units for dewatering CCR and use of the surface impoundments will be discontinued. Also, the MWG employees testified that the active CCR impoundments are routinely emptied.

# 2.3 Quarles fails to consider the extensive data record available at each Station.

Quarles does not adequately consider the entire record. In particular, the record contains an extensive amount of environmental data (i.e., soil, ash, and groundwater) collected from the MWG Stations. These data have been collected from 1998 up until late 2020, in the case of recent

investigations performed at both the Joliet 29 and Waukegan Stations. Quarles fails to consider the extensive environmental data collected by MWG that is relevant to deciding the appropriate remedy at each of the Stations.

Although Quarles does not identify a specific remedy for each of the Stations, he broadly concludes that "Even though MWG plans to close ash ponds at Joliet 29, Powerton, Waukegan, and Will County by excavation and removal, those closure efforts will be incomplete to remove contaminant sources if historical coal ash remains in adjacent areas or beneath the former active ash ponds. Closure by excavation is expected to improve groundwater quality over time because the source of the contaminants is removed" 68. However, there is no independent analysis performed in the Quarles Report to demonstrate that there are or will be source areas at the Stations. As described in greater detail in subsequent sections, an evaluation of the leaching data collected from CCR surface impoundments and soil obtained from historical fill areas indicates that not all coal ash is necessarily a source that will contribute to groundwater contamination.

Not only does the Quarles Report fail to reference data already available, it fails to mention the February 2020 Board Order reaffirming the continued application of the GMZs at three of the Stations, which cease the applicability and the violations of Part 620 of the Board regulations that were previously found by the Board in the 2019 Board Order.

# 2.4 Quarles fails to adequately consider the specific factors used by the Board as the basis for a remedy at each Station.

The Quarles Report does not adequately evaluate the factors listed in the Act Section 33(c) and 42(h) that the Board directed be utilized as the basis for any remedy. Rather than concluding that a specific remedy was or was not required at the various Stations, Quarles more broadly stated that other actions are required to meet Illinois EPA groundwater standards, but he fails to address the technical practicability or economic reasonableness of a remedy, the suitability of the Stations to the area at which they are located, and any due diligence to comply, including entry into and compliance with the CCAs.

<sup>&</sup>lt;sup>68</sup> Quarles Report at 25.

#### 3 REGULATORY FRAMEWORK

The following opinions set the applicable regulatory background relevant to determining the appropriate action and/or remedy, which is discussed in more detail below in Section 4.

# 3.1 The Federal and State CCR Rules apply to specific units at each Station, not to all coal ash present at the Station.

As first mentioned above in Section 1.4, the Federal and IL CCR Rules apply to each of the four Stations. Specifically, these rules apply to both existing and inactive surface impoundments under the definitions in the Federal CCR Rules and Illinois CCR Rules. However, these rules only apply to specific areas of each Station, based upon those areas meeting the regulatory definitions of existing or inactive surface impoundment, discussed above in Section 1.4.1. Other areas outside the federal/state surface impoundments do not meet the regulatory definition of a surface impoundment.

The specific CCR units subject to either the Federal and/or State CCR requirements at each of the four Stations is discussed above in the Station Background Section 1.5.

The record associated with Illinois rulemaking R20-19 indicates that certain parties (including some of the Complainants) formally requested that the Board develop Illinois regulations for "historic, unconsolidated coal ash fill". If these areas were already regulated under the IL CCR Rules, there would be no need for additional regulations. However, the areas of unconsolidated fill are not unregulated. Instead, the Act and the Board regulations generally apply to all areas in all parts of the State of Illinois.

# 3.2 The 2012 CCAs at each of the Stations are key compliance mechanisms that have also resulted in collection of a substantial quantity of data useful for characterization of environmental conditions and implementation of measures to control potential contaminant sources at each Station.

In response to the issuance of notices from Illinois EPA related to alleged violations of the Act and 35 Ill. Adm. Code 620 Groundwater Quality Standards, MWG entered into CCAs with Illinois EPA at all four Stations. Each of the CCAs was accepted by Illinois EPA in separate letters to MWG dated October 24, 2012. The CCAs placed various obligations on MWG for each of the Stations.

At Joliet 29, MWG agreed to undertake the following to attain compliance with the alleged violations:

- a) The ash ponds at Joliet 29 shall not be used as permanent disposal sites and shall continue to function as treatment ponds to precipitate ash. Ash shall continue to be removed from the ponds on a periodic basis.
- b) The ash treatment ponds shall be maintained and operated in a manner which protects the integrity of the existing liners. During the removal of ash from the ponds, appropriate procedures shall be followed to protect the integrity of the existing liners, including operating the ash removal equipment in a manner which minimizes the risk of any damage to the liner.
- c) During the ash removal process, visual inspections of the ponds shall be conducted to identify any signs of a breach in the integrity of the pond liners. If a breach of the pond liners is detected, MWG shall promptly notify the Illinois EPA and shall implement a corrective action plan for repair or replacement as necessary. Upon Illinois EPA approval, and issuance of any necessary construction permit, MWG will implement the corrective action plan.
- d) Continue quarterly groundwater monitoring and submit the results to Illinois EPA, including groundwater elevation data/potentiometric surface map.
- e) Submit an application for a construction permit to reline Pond #3 with a HDPE liner.
- f) Submit an application to establish a GMZ within 90 days.
- g) Establish a GMZ within one year.
- h) Once Pond #3 was relined and the GMZ established, submit a certification/statement of compliance.

The CCA for Powerton included the same basic provisions as items (a) through (d), (g), and (h) above for Joliet 29. In addition, the Powerton CCA included the following requirements:

- a) Submit an application for a construction permit to reline the Ash Surge Basin and Secondary Ash Settling Basin with a HDPE liner or approved equivalent.
- b) Install an additional groundwater monitoring well south of well 9.
- Enter/record an Environmental Land Use Control (ELUC) to cover the area of the Powerton Station property contained within the GMZ.

- d) Do not allow the East Yard Run-off Basin to be part of the ash sluicing flow system. Also, submit monitoring results from water contained in the East Yard Run-off Basin proximate to outfall monitoring point 003 within 60 days. Quarterly monitoring of the East Yard Run-off Basin shall also be performed.
- e) No unlined areas may be used for permanent or temporary ash storage or ash handling.

The CCA for Will Co. contained the same basic provisions as items (a) through (d), (g), and (h) above for Joliet 29. The following items were also included:

- a) Remove Ponds 1N and 1S from service and divert process water to Ponds 2S and 3S. Also, a dewatering system shall be developed and implemented, which will not allow water to exceed a depth of one foot above the bottom of Ponds 1N and 1S.
- b) Submit an application for a construction permit to reline Pond 2S with HDPE liner (or approved equivalent material).
- c) Enter an ELUC to cover the area of the Will County Station property covered under the GMZ, except for the portion owned by ComEd.

The Waukegan CCA included the same requirements as those listed for the other Stations above related to operations at the ash ponds and regular groundwater monitoring. The Waukegan CCA also required:

- a) Installation of two additional groundwater monitoring wells at locations approved by Illinois EPA;
- b) Enter an ELUC to cover the remaining Station property to the east not already included in the existing ComEd Former Tannery Site ELUC.

As required by the CCAs, MWG filed a certificate with the Illinois EPA that the measures outlined in the CCA were implemented (with groundwater monitoring continuing at all stations and GMZs in place at three), as follows:

- Joliet 29, on October 9, 2013;
- Powerton, on October 17, 2013;
- Will County, on October 17, 2013; and
- Waukegan, on October 22, 2013.

Illinois EPA has not pursued any additional enforcement action against MWG at any of the four Stations since the CCAs were signed.

The CCAs resulted in a database of groundwater quality data since the CCAs were established in 2012. Groundwater data has also been collected at the four Stations under the Federal CCR Rules. A total of 57 monitoring wells have been monitored at the four Stations for thirty-four (34) constituents four times per year, which has resulted in the collection of over 62,000 individual data points since establishment of the CCAs in 2012 (8 years of monitoring). As will be discussed further below, WCG has statistically evaluated the data collected near the downgradient property boundaries at each Station. This statistical analysis indicates that the majority of statistical trends in the data are downward, as discussed in Section 4.3.

WCG has assisted clients in the development of many different CCAs in the past. We have CCA experience related to various environmental regulations, primarily issues with the Illinois EPA Bureau of Land involving solid and/or hazardous waste management/disposal, related to the RCRA, as well as issues with the Illinois EPA Bureau of Water primarily involving the Clean Water Act (CWA). A common attribute associated with clients that enter CCAs is a desire to voluntarily comply with environmental regulations, not avoid compliance. The alleged violations of the 35 Ill. Adm. Code 620 standards addressed by the CCAs are the same violations of the Act cited in the 2019 Board Order. The CCAs were entered on a voluntary basis to responsibly address the alleged violations identified by Illinois EPA and comply with the applicable regulations.

Whether the Respondent has successfully completed a CCA is one of the factors the Board must consider under Section 42(h) of the Act in mitigation or aggravation of any penalty, if a penalty is to be imposed. MWG having successfully entered CCAs for each Station and subsequent compliance with the terms and conditions included in the CCAs, is a mitigating factor in this case.

## 4 APPROPRIATE ACTIONS/REMEDY

As discussed in the 2019 Board Order, the current phase of this litigation is intended to determine the appropriate relief and any remedy that may be required. WCG's opinions concerning relief and remedy presented in this section are subdivided into two categories addressing the potential need for:

- 1. Additional site investigation; and
- 2. A remedy to address the environmental conditions, based on both Board Orders.

The above items are presented separately because the need for additional investigation was discussed by Quarles and additional investigation to characterize a site (such as additional soil/groundwater sampling/analysis) is viewed as fundamentally different than a remedy, which under certain circumstances, may be required to address contaminated groundwater previously documented at the Stations.

# 4.1 The Federal/State CCR Surface Impoundments at each Station do not need to be investigated further to determine appropriate actions.

The Federal/State CCR surface impoundments do not need to be investigated further because the existing Federal/State CCR Rules already sufficiently address any required investigation. Moreover, the record indicates that the Federal CCR surface impoundments are operated pursuant to the Federal CCR Rules, which are deemed sufficiently protective of human health and the environment.

A rigorous groundwater monitoring program is being implemented at each of the Stations. The groundwater monitoring program is largely based upon the RCRA Subtitle D groundwater monitoring program implemented at solid waste landfills since the 1990s. Pursuant to the Federal CCR Rules, MWG is implementing a detection or assessment groundwater monitoring program at each of the Stations. The groundwater concentrations are compared to statistically derived background concentrations to evaluate whether the regulated units are adversely impacting groundwater.

Quarles incorrectly opines that the existing background groundwater data are not sufficient for evaluating whether the regulated CCR units have impacted groundwater quality. The existing background groundwater data utilized to evaluate whether the Federal CCR Surface Impoundments are adversely impacting groundwater are appropriate for satisfying the

regulatory requirements in the Federal CCR Rules and determining background concentrations at the Stations. The Federal CCR Rules require that the detection and assessment monitoring (if needed) programs focus on potential contributions of the regulated units to groundwater. The upgradient wells identified by KPRG<sup>69</sup> in the monitoring programs for the Stations are not affected by the regulated units because the wells are upgradient based on groundwater elevation contour maps, there is no evidence of mounding from the units, the units are lined, and those liners are functioning as designed to control infiltration from the surface impoundments. Groundwater elevation contour maps produced annually, most recently for data collected in 2020 and 2021<sup>70</sup>, in accordance with the CCR monitoring at each Station do not indicate groundwater mounding in proximity of the regulated units. WCG agrees with the direction of groundwater flow depicted in the 2020 CCR Compliance Annual Groundwater Monitoring and Corrective Action Reports for all the Stations prepared by KPRG.

Based on the lack of groundwater mounding observed at the Stations, the upgradient wells represent the character of groundwater flowing from areas upgradient of the CCR surface impoundments and that the identified upgradient groundwater quality is the correct basis for comparison to the groundwater quality after it has passed beneath the CCR Surface Impoundments.

#### 4.1.1 Groundwater Conditions at Powerton

WCG disagrees with Quarles' attempt to identify mounded groundwater and radial groundwater flow conditions emanating from the Ash Surge Basin and the Bypass Basin at the Powerton Station<sup>71</sup>.

The Quarles Report fails to differentiate that at the Powerton Station, there are two saturated vertical units. Quarles instead inappropriately combines groundwater elevation data for monitoring wells screened in two different saturated zones into one contour map. Using groundwater elevation data from two separate units to create one potentiometric surface

<sup>&</sup>lt;sup>69</sup> KPRG is the environmental consultant performing groundwater monitoring at each of the Stations.

 $<sup>^{70}</sup>$ CCR Compliance Annual Groundwater Monitoring and Corrective Action Report – 2020 for the Joliet #29 Station at 11-12; CCR Compliance Annual Groundwater Monitoring and Corrective Action Report – 2020 for the Ash Surge Basin and Bypass Basin at the Powerton Station at 13-14; CCR Compliance Annual Groundwater Monitoring and Corrective Action Report – 2020 for the Former Ash Basin at the Powerton Station at 16-17; CCR Compliance Annual Groundwater Monitoring and Corrective Action Report – 2020 for the Will County Station at 11-12; and CCR Compliance Annual Groundwater Monitoring and Corrective Action Report – 2020 for East and West Ash Ponds at the Waukegan Station at 13-14.

<sup>&</sup>lt;sup>71</sup> Expert Report of Mark A. Quarles at pg. 16.

diagram is inconsistent with industry standard practice and results in his inaccurate conclusion that there is mounding under the Ash Surge Basin and the Bypass Basin. WCG's evaluation of the April 2020 groundwater elevation data along with the monitoring well boring logs and well construction logs identified the following:

- Six wells (MW-6, MW-8, MW-12, MW-14, MW-15, and MW-17) screened within a confining clay/silt unit and the overlying gravel, sand, and cinders unit;
- Twelve (12) wells screened within the deeper unit consisting mostly of gravel and sand; and one well (MW-18) screened within both the deep and shallow sand units separated by a confining clay unit. Given MW-18 is screened across two water bearing units, MW-18 groundwater elevation data is not an accurate representation of either water bearing units. Therefore, MW-18 groundwater elevation data should not be used in the creation of potentiometric surface maps.

The two different units demonstrate that there are two distinct but hydraulically connected groundwater units, a conclusion that was identified by KPRG and that has been consistently demonstrated in each of MWG's groundwater reports for the CCR surface impoundments. In fact, that there are two distinct but hydraulically connected units was never in dispute. Rather, Complainants' first expert agreed with KPRG's analysis, testifying that there are two aquifers at Powerton, that one was a sand-and-gravel unit, and the other was a silty clay aquifer. Once the two saturated vertical units are identified, it is clear that there is no mounding in the groundwater under the Ash Surge Basin and the Bypass Basin.

#### 4.1.2 Alternate Source Demonstrations (ASDs)

The Federal CCR Rules allow for a demonstration that the regulated units are not the source of the confirmed statistically significant increases above the background concentrations. MWG has pursued this Alternate Source Demonstration (ASD) path at three of the Stations: Powerton, Will County, and Waukegan. No ASD was needed for Joliet 29 because no statistically significant increases have been confirmed at monitoring wells monitoring Pond 2, which is the only unit covered under the Federal CCR Rules at the Joliet 29 Station. Each of the ASDs has been certified by an Illinois Licensed Professional Engineer (PE) and made available to the on-line MWG CCR platform. Further discussion concerning the ASDs is presented below:

<sup>&</sup>lt;sup>72</sup> Oct. 26, 2017 Afternoon Transcript, pg. 93:15-20.

#### 4.1.2.1 Powerton ASD

The initial detection monitoring results for the Powerton Station were discussed by KPRG in the 2017 CCR Groundwater Monitoring Report dated January 24, 2018<sup>73</sup>. KPRG recommended completing an ASD because the detection monitoring statistical evaluations indicated statistically significant increases (SSIs) in downgradient monitoring wells relative to established background for various 40 CFR 257 Appendix III parameters.

The recommended ASD for SSIs of Appendix III detection monitoring parameters was performed April 12, 2018<sup>74</sup>. Ash and water samples were collected from the Ash Surge Basin and the Bypass Basin and analyzed using the Leaching Environmental Assessment Framework (LEAF) method to determine whether the noted SSIs may be associated with a release from the regulated unit(s) or if another potential source in the vicinity of the ash ponds may be affecting the local groundwater quality. Each of the samples underwent leaching over a range of 8 pH values and under "Natural pH" conditions, which is the actual pH of the sample itself. The natural pH results are believed to be the most applicable to field conditions because the natural pH represents the best approximation of field conditions. A summary of the LEAF data is located in **Table 2**. KPRG concluded that the Ash Surge Basin is not the source of downgradient monitoring well SSIs and that there is an alternate source(s) of impacts.

KPRG concluded that the data relative to the Bypass Basin was not definitive and potential contribution of leachate from the Bypass Basin to the local downgradient groundwater impacts could not be ruled out. KPRG recommended that the Ash Surge Basin and Bypass Basin be shifted from detection monitoring into assessment monitoring To In accordance with the Federal CCR rules, KPRG performed a round of assessment monitoring for all Appendix III and Appendix IV parameters and determined that there were detections of Appendix IV parameters at concentrations exceeding Groundwater Protection Standards (GWPS), including arsenic at three well locations MW-11, MW-12 and MW-17, barium at well location MW-11 (August sampling only), selenium at well location MW-15, and molybdenum (May sampling only) and thallium at

<sup>&</sup>lt;sup>73</sup> KPRG, CCR Compliance Annual Groundwater Monitoring and Corrective Action Report – 2017 Powerton Station, dated January 24, 2018.

<sup>&</sup>lt;sup>74</sup> KPRG, Alternate Source Demonstration CCR Groundwater Monitoring Powerton Generating Station, dated April 12, 2018.

<sup>&</sup>lt;sup>75</sup> Both Basins were shifted into assessment monitoring even though KPRG determined that the Ash Surge Basin was not the source of the SSIs. As described in the CCR Annual Groundwater Monitoring and Corrective Action Report – 2018, dated January 31, 2019, KPRG concluded that Ash Surge Basin should be included in the assessment monitoring as the well network for the Ash Surge Basin and Bypass Basins are "somewhat integrated".

well location MW-17. KPRG recommended that an ASD for the Appendix IV parameters be completed<sup>76</sup>.

An ASD for detected Appendix IV parameters above established groundwater protection standards (GWPSs) was performed on March 25, 2019<sup>77</sup>. Ash and water samples were again collected from the Ash Surge Basin and Bypass Basin and analyzed using the LEAF method. A summary of the LEAF data is located in Table 2. KPRG performed a statistical evaluation of the LEAF data relative to groundwater and concluded that the Ash Surge Basin and Bypass Basin are not the source of downgradient monitoring well detections of arsenic, barium, molybdenum, selenium, and thallium concentrations detected above the GWPSs.

#### 4.1.2.2 Will County ASD

The ASD for Will County was prepared by KPRG and dated April 12, 2018. The 2017 CCR Groundwater Monitoring Report dated January 12, 2018 included the following recommendation:

"The completed detection monitoring statistical evaluations have determined that there are SSIs in downgradient monitoring wells relative to established background for chloride, fluoride and TDS. At this time, KPRG recommends completing an alternate source demonstration to determine whether these exceedances may be associated with an actual release from the regulated unit(s) or if another potential historical source in the vicinity of the ash ponds may be affecting the local groundwater quality. If the alternate source demonstration is successful, then detection monitoring will resume. If the alternate source demonstration is not successful, then a transition to an assessment monitoring program complying with Section 257.95 will be required."

To support the ASD, composite ash samples were collected from Pond 2S and Pond 3S. The composite samples consisted of a series of equivalent grab samples from across the length of the ponds, from the inlet area to the outfall. The samples were analyzed using the LEAF method. Each of the samples underwent leaching over a range of 8 pH values and under "Natural pH" conditions, which is the actual pH of the sample itself. The natural pH results are believed to be the most applicable to field conditions because the natural pH represents the best approximation

<sup>&</sup>lt;sup>77</sup> KPRG, CCR Compliance Annual Groundwater Monitoring and Corrective Action Report – 2018 Ash By-Pass Basin and Ash Surge Basin, dated January 31, 2019.

of field conditions. The leachate was analyzed for the CCR Appendix III detection parameters. The results from the LEAF Natural pH testing are summarized in **Table 3**.

The Will County ASD concluded that the SSIs for chloride, fluoride, and total dissolved solids (TDS) identified in the groundwater are not the result of leakage of leachate from the regulated units (Ponds 2S and 3S), but rather from "other potential sources". This was based on the following:

- Upgradient monitoring well concentrations of fluoride and TDS are higher than those measured for ash leachate at Natural pH conditions.
- The ash leachate at Natural pH conditions does not contain a sufficient concentration of each of these constituents to result in the measured downgradient well concentrations.

### 4.1.2.3 Waukegan ASD

The initial detection monitoring results for the Waukegan monitoring were presented by KPRG in the CCR Compliance Annual Groundwater Monitoring and Corrective Action Report dated January 31, 2019<sup>78</sup>.

According to an ASD prepared by KPRG on April 12, 2018 for the Waukegan Station<sup>79</sup>, detection monitoring statistical evaluations determined that there were SSIs in downgradient monitoring wells relative to established background for boron, pH and sulfate. Therefore, the ASD evaluated boron, pH, and sulfate. Ash and water samples were collected from each of the two CCR Ponds (East and West) and analyzed using the LEAF method (as described above). A summary of the LEAF data is located in **Table 4**. KPRG concluded that the SSIs for boron, pH, and sulfate are not the result of a release of leachate from the regulated units (East and West Ash Ponds) but rather from other potential source(s). KPRG based the recommendation on evaluation of the boron and sulfate ratio for ash samples and groundwater, the downgradient sulfate concentrations relative to the LEAF data, elevated sulfate outside the regulated units, and the concentration of sulfate and boron in groundwater upgradient of the CCR Ponds relative to the downgradient groundwater and LEAF results. The recommendation was to continue with routine detection monitoring.

**Weaver Consultants Group North Central, LLC** 

<sup>&</sup>lt;sup>78</sup> KPRG, CCR Compliance Annual Groundwater Monitoring and Corrective Action Report – 2018 for the Waukegan Generating Station, dated January 31, 2019.

<sup>&</sup>lt;sup>79</sup> KPRG, Alternate Source Demonstration CCR Groundwater Monitoring at the Waukegan Generating Station, dated April 12, 2018.

#### 4.1.3 Testing of Coal Ash Under Beneficial Use Requirements

The coal ash that is removed from the Federal CCR surface impoundments at the Stations for offsite use has been sampled and analyzed to support the beneficial reuse of this product. Specifically, as discussed above in Section 1.4.3 and pursuant to Section 3.135(a) of the Act, NLET test results are obtained and compared to the Illinois Class I Groundwater Quality Standards located in 35 III. Adm. Code 620.410. A summary of this historical analytical data included in the record reviewed by WCG is presented in **Tables 1 - 4**. These data indicate:

- Powerton: a composite sample of bottom ash collected in February 2007 did not exhibit any metals concentrations above the Class I Groundwater Quality Standards;
- Will County: a composite sample of bottom ash collected in December 2010 did not exhibit any metals concentrations above the Class I Groundwater Quality Standards;
- Waukegan: two composite samples of bottom ash collected in July 2004 did not exhibit any metals concentrations above the Class I Groundwater Quality Standards.

Overall, the above NLET data indicates that the coal ash sampled from the Federal CCR surface impoundments exhibits concentrations of metals less than the Class I Groundwater Quality Standards. In addition, the upgraded liners installed above the historical Poz-o-Pac<sup>TM</sup> liners are consistent with industry-accepted standards, USEPA's Guide for Industrial Waste Management (2012), and industry acceptance of and reliance on HDPE liners under RCRA.

# 4.2 Historical fill areas at each Station do not need to be investigated further to determine appropriate actions.

When the vast quantity of available data collected at the Stations and available in the regulatory record associated with the Federal CCR Rules is considered, the data and information indicate that sufficient investigation of historical fill areas identified at the Stations has already occurred. These historical fill areas do not meet the regulatory definition of "CCR surface impoundment" because they were not designed to hold an accumulation of CCR and liquids. Because the record indicates that these historical fill areas received CCR before October 19, 2015, these areas are excluded from the Federal CCR Rules.

One reason for excluding these units from the Federal CCR rules is discussed in the preamble to the CCR Rulemaking, wherein USEPA specifically states that the Agency is not aware of any damage cases associated with inactive CCR landfills. Further, the risks of releases to the environment from such units are significantly lower than CCR surface impoundments or active

CCR landfills<sup>80</sup>. The primary reason for the reduced risk associated with inactive landfills is that these areas do not exhibit a constant head of water on top of the CCR materials, as is the case with surface impoundments and active landfills. The weight and pressure of water in surface impoundments is more likely to result in releases to the environment.

The above opinion is further supported by a substantial amount of data historically collected at each of the four Stations. Some of these data were collected before MWG's acquisition of the Stations, additional data was collected during MWG's ownership, and data collection has occurred until recently, as the most recent data was obtained at the Joliet 29 and Waukegan Stations during the 4<sup>th</sup> quarter of 2020. The following provides a discussion of the historical data collected related to the historical fill areas at each of the Stations.

#### 4.2.1 Joliet 29

The 1998 Phase II Environmental Site Assessment (ESA) performed by ENSR<sup>81</sup>, included the results from 17 soil borings, installation of five monitoring wells, 23 surface soil samples, and 6 sediment samples. The locations of the various samples collected is shown on **Figure 5**.

As related to the historical fill areas relevant to the case, groundwater monitoring wells MW-3 and MW-4 installed as part of the 1998 Phase II ESA are located downgradient of the Northwest and Southwest Fill Areas, while MW-5 is also located near the Northwest Fill Area. While an insufficient volume of groundwater was present in MW-4, the results from the groundwater samples analyzed at MW-3 and MW-5 did not identify concentrations of RCRA Metals (As, Ba, Cd, Cr, Pb, Hg, Se, Ag) above the Class I Groundwater Quality Standards.<sup>82</sup>

The 1998 Phase II ESA Report indicated: "Based on the current land use (industrial) and site conditions (analytical results and soil types), it is judged that the potential for human exposure to the constituents of concern from this facility is low." The Phase II ESA Report concluded: "There is not a requirement under Illinois environmental law to further investigate or remediate this property." 83

MWG collected additional information at the Northwest Fill Area in 2004. An initial investigation performed by Andrews Environmental Engineering (AEE) is referenced in KPRG's August 18, 2005

<sup>80 40</sup> FR 21342.

<sup>&</sup>lt;sup>81</sup> ENSR, December 1998.

<sup>&</sup>lt;sup>82</sup> Arsenic, barium, cadmium, chromium, lead, mercury, and selenium are listed as constituents to evaluate the presence of contamination of coal ash in groundwater. 35 III. Adm. Code 845.600.

<sup>83</sup> ENSR, December 1998.

Letter Report to MWG<sup>84</sup>. AEE performed an initial site assessment of an area at Joliet 29 to determine whether a CCB classification was feasible. The area investigated by AEE is now referred to as the Northwest Fill Area. AEE found that the subsurface materials were generally homogenous, consisting of interlayered fly ash and bottom ash/slag. A total of 20 samples were collected from 20 borings across a 13.2-acre area. The 20 samples were composited into one representative sample and analyzed for NLET metals and for "Code R" disposal parameters, which included Toxicity Characteristic Leaching Procedure (TCLP) metals, semi-volatile organic compounds (SVOCs), volatile organic compounds (VOCs), ignitability, reactive cyanide, and reactive sulfide.

According to the above 2005 KPRG report, the results indicated that none of the leachable metals analyzed using the NLET method exceeded the Class I Groundwater Quality Standards and the material would be classified as non-hazardous for disposal purposes.

Intending to build off the information collected in 2004 by AEE, MWG contracted with KPRG to perform additional investigation of the Northwest Fill Area in June 2005. A total of 15 Geoprobes (GP-1 through GP-15) were advanced over the 13.2-acre study area. Three of the original locations (GP-12, GP-14, and GP-15) did not exhibit CCR and therefore these locations were offset to locations GP-12A, GP-14A, and GP-15A. The coal ash deposits encountered within these Geoprobes were consistent and homogeneous, consisting of interlayered fly ash and bottom ash/slag from the coal combustion process.

A composite soil sample of the entire vertical profile of each of the Geoprobes was submitted for laboratory analysis using the NLET method for metals. A total of 17 composite samples from the Northwest area were analyzed for NLET metals and the results are summarized in **Table 1**. The results from 16/17 samples exhibited NLET metals below the Class I Groundwater Quality Standards. Concentrations of copper and lead from GP-14A were higher than the Class I Groundwater Quality Standards. A statistical analysis was performed on the remaining 16 samples. The results indicated "with a high degree of statistical certainty that the criteria established in 415 ILSC 5/3.135...are met and that the material may be considered CCB relative to this criterion" and the "data set is sufficiently large to support the statistical evaluations based on the variance and specific regulatory threshold relationships" <sup>85</sup>.

<sup>84</sup> KPRG, August 18, 2005.

<sup>85</sup> KPRG, August 18, 2005.

In response to the identification of the above concentrations of copper and lead in the NLET result from GP-14A, additional delineation within this area was undertaken in the Northwest area in November 2005. The results were presented in a report to MWG by KPRG dated December 6, 2005<sup>86</sup>. Eight additional Geoprobes and one test pit was installed to collect ash/slag samples from around boring GP-14A. One composite sample was collected from the entire vertical profile at each Geoprobe and the test pit and submitted for NLET for copper and lead. The additional samples collected in November each exhibited concentrations of NLET copper and lead below the Class I Groundwater Quality Standards, which adequately delineated the (limited) extent of the soils exhibiting concentrations of NLET copper and lead above the Class I Groundwater Quality Standard.

As documented in KPRG's 12/6/2005 Report, waste profiling data consisting of TCLP metals, TCLP VOCs, TCLP SVOCs, pH, paint filter, reactive cyanide/sulfate, flashpoint, phenols, and chlorinated solvents scan, was used to classify the materials as non-hazardous special waste for disposal purposes. A total of 52 loads of soil/CCR weighing 1,062.88 tons were excavated and hauled to the Environtech Landfill facility in Morris, Illinois for disposal, as a remedial action<sup>87</sup>.

The most recent site investigation work at the Joliet 29 Station was performed in November 2020 and focused on the area in proximity to monitoring well MW-09, which has historically exhibited fluctuating concentrations of TDS and sulfate in the groundwater exceeding the 35 Ill. Adm. Code 620 Class 1 Groundwater Quality Standards. This area was the only area at the Joliet 29 Station identified by the Board as evidence of a violation of 12(a) of the Act<sup>88</sup>. A total of 18 soil borings were advanced in the vicinity of MW-09 and various soil samples obtained from these borings were analyzed for sulfate, iron, and manganese<sup>89</sup>.

The soils in the investigation area consisted of a mixture of brown to gray sand, gravel, silty sand, and some clay. No coal ash materials were identified in the above boring logs. The analytical results from this investigation indicated concentrations of iron and manganese in the soil in this area generally at consistent concentrations, some which exceed the Soil Background Concentration in Metropolitan Statistical Areas included in the 35 Ill. Adm. Code TACO Regulations. However, the sulfate concentrations reported in the soil samples varied widely.

<sup>&</sup>lt;sup>86</sup> KPRG, December 6, 2005.

<sup>&</sup>lt;sup>87</sup> 2019 Board Order mistakenly states on pg. 28 that "the record does not include information as to whether MWG separated or removed this part of the material from the sampled area."

<sup>&</sup>lt;sup>88</sup> 2019 Board Order, pg. 31-33 and pg. 78.

<sup>89</sup> MWG 13-15 79341-79442.

Most of the sulfate concentrations were reported below 100 mg/kg. However, certain samples exhibited sulfate concentrations of an order of magnitude (or more) higher. For example, SB-11 (11-13') reported sulfate at 2,000 mg/kg, SB-14 (3-4') reported sulfate at 4,000 mg/kg, SB-15 (6-8') reported sulfate at 16,000 mg/kg. There are no apparent distribution trends either horizontally or vertically in the soil.

The pH in the groundwater at MW-09 is more acidic, compared to the other locations, which is believed to be related to oxidation of a localized pocket of residual sulfide minerals near the MW-9. Sulfide minerals are common within the underlying Silurian dolomite bedrock<sup>90</sup>, which comprises the parent material for the soil. Oxidation reactions of sulfide minerals results in the formation of sulfuric acid and mobilization of metals such as iron, manganese, and other metals, depending on the specific mineral and associated impurities. These oxidation reactions are believed to be associated with the groundwater quality conditions observed in the groundwater at MW-09. Thus, the sporadic sulfate and TDS groundwater concentrations are naturally occurring in the soil and not due to Station operations, including the presence of CCR in the soil or leaking from a pond.

The Northeast area is regularly inspected under the Station's NPDES stormwater permit. The inspections are performed on an annual basis by a third party contractor (KPRG). If erosional features are identified during the inspections, the appropriate repairs have been implemented in a timely manner<sup>91</sup>.

The historical data as described above are sufficient to adequately characterize the historical coal ash fill areas at the Joliet 29 Station for the purposes of assessing a remedial approach. The Board did not identify the northwest, northeast or the southwest areas as causes for the elevated concentrations in the groundwater, based on the lack of monitoring well data. <sup>92</sup> It appears that the Board did not consider the 1998 groundwater data when making this conclusion. <sup>93</sup> Additionally, the Board has created a sub-docket in the Illinois CCR Rulemaking, R20-19(A) to explore "historic, unconsolidated coal ash fill in the State", located outside of surface impoundments, *In the Matter of: Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments: Proposed new 35 Ill. Adm. Code 845 (Sub Docket A)*, PCB R20-19(A). Any

<sup>&</sup>lt;sup>90</sup> MWG Ex. 621 (MWG13-15 297); https://www.mdpi.com/2076-3263/6/2/29/htm.

<sup>91</sup>MWG Exhibits 800-805.

<sup>&</sup>lt;sup>92</sup> Board 2019 Order, pp. 27-28.

<sup>&</sup>lt;sup>93</sup> Id.

additional assessment of these historical fill areas that is deemed necessary will be addressed by the Board's rulemaking in Sub-docket 20-19(A).

#### 4.2.2 Powerton

A Phase II ESA was also prepared by ENSR for the Powerton Station in 1998<sup>94</sup>. The investigation included the results from 28 soil borings, six monitoring wells, 17 surface soil samples, and 12 sediment samples. A summary of the locations of the various samples collected is shown on **Figure 6**.

During the groundwater investigation, monitoring wells were installed to assess groundwater quality in proximity of the Yard and Roof Runoff Basin (also referred to as the East Yard Runoff Basin) and the Former Ash Basin. The results from the groundwater samples analyzed at MW-1 and MW-2 did not identify concentrations of RCRA Metals (As, Ba, Cd, Cr, Pb, Hg, Se, Ag) above the Class I Groundwater Quality Standards.<sup>95</sup>

The 1998 Phase II ESA Report indicated: "Based on the current land use (industrial) and site conditions (analytical results and soil types), it is judged that the potential for human exposure to the constituents of concern from this facility is low." The Report concluded: "There is no requirement under Illinois environmental law to further investigate or remediate this property."

After the 1998 Phase II, Patrick Engineering, on behalf of MWG, conducted a hydrogeologic investigation at the Powerton Station in 2010. This evaluation included the installation of monitoring wells downgradient of the Former Ash Basin, including MW-3, MW-4 and MW-5. Monitoring well locations are shown on **Figure 6**.

Based on the data available at the time of the proceedings, the Board determined in its 2019 opinion that the groundwater samples taken downgradient of the Former Ash Basin showed no coal ash constituents. The Board concluded that the Complainants did not prove that it was more likely than not to be a source of contamination at the Station<sup>96</sup>. After the ENSR 1998 Phase II ESA and Patrick 2010 Hydrogeologic Investigation, additional evaluation of the Former Ash Basin has been on-going since October 2016 in accordance with 40 CFR 257.100(b) through (d) of the

<sup>&</sup>lt;sup>94</sup> ENSR, December 1998.

<sup>&</sup>lt;sup>95</sup> Arsenic, barium, cadmium, chromium, lead, mercury and selenium are listed as constituents to evaluate the presence of contamination of coal ash in groundwater. 35 III. Adm. Code 845.600.

<sup>&</sup>lt;sup>96</sup> 2019 IPCB Order, pg. 41.

Federal CCR Rules<sup>97</sup>. For the purpose of the Federal CCR groundwater monitoring requirements, monitoring wells MW-01 and MW-10 (upgradient) and monitoring wells MW-02 through MW-05 (downgradient) are sampled annually<sup>98</sup>. MWG is required to implement the detection and assessment monitoring program for the Former Ash Basin, and, if necessary, to conduct corrective action.

The historical data as described above are sufficient to adequately characterize the historical coal ash fill areas at the Powerton Station.

#### 4.2.3 Will County

Like the other Stations discussed above, a Phase II ESA Report was generated in 1998 prior to MWG's acquisition of the Will County Station. The 1998 Phase II Environmental Site Assessment (ESA) was also performed by ENSR<sup>99</sup>. This investigation included the results from 18 soil borings, installation of five monitoring wells, 23 surface soil samples, and 14 sediment samples. The locations of the various samples collected is shown on **Figure 7**.

Pertaining to the historical fill areas relevant to the case, borings B-1 and B-2 were advanced within the southeast portion of the Station and MW-1 was installed near B-2 (see **Figure 7**). While coal ash was noted as mixed with soils obtained from B-1 and B-2, concentrations of total RCRA metals in the soils from 0-3 ft. below ground surface (bgs) did not exceed the TACO Tier 1 soil remediation objectives (SRO). Of note is arsenic, as it has been noted in the record as present in the groundwater at certain wells monitored under the Federal CCR Rules and the CCA above the Class I Groundwater Quality Standard. The arsenic concentrations at B-1 and B-2 were reported as 4.6 mg/kg and 4.9 mg/kg respectively, which are below the TACO Tier 1 SRO, which is currently 13 mg/kg (i.e., the background concentration for sites within Metropolitan Statistical Areas). The groundwater sample collected from MW-1 did not exhibit concentrations of RCRA Metals (As, Ba, Cd, Cr, Pb, Hg, Se, Ag) above the Class I Groundwater Quality Standards<sup>100</sup>.

#### **Weaver Consultants Group North Central, LLC**

<sup>&</sup>lt;sup>97</sup> KPRG, CCR Compliance Annual Groundwater Monitoring and Corrective Action Report – 2020 for the Former Ash Basin. January 31,2021.

<sup>&</sup>lt;sup>98</sup> Id.

<sup>&</sup>lt;sup>99</sup> ENSR, December 1998.

<sup>&</sup>lt;sup>100</sup> Arsenic, barium, cadmium, chromium, lead, mercury, and selenium are listed as constituents to evaluate the presence of contamination of coal ash in groundwater. 35 III. Adm. Code 845.600.

Given these historical analytical results, although coal ash was noted within the southeast portion of the Station, sufficient investigation has been performed to evaluate whether this area presents an unacceptable risk to human health and the environment.

Although coal ash was identified in certain borings advanced as part of the 1998 Phase II ESA performed at the Will County Station, no concentrations of RCRA metals were reported above the TACO Tier 1 SRO, including arsenic. As mentioned above, arsenic is of particular relevance because arsenic is a more common heavy metal constituent that may be related to CCR and it has been identified in the groundwater at concentrations exceeding the Class I Groundwater Quality Standard. This historical analytical data supports the conclusion that the mere presence of CCR within historical boring logs does not necessarily mean that these areas serve as sources and represent a threat to human health and the environment.

Another investigation of the historical fill areas was performed by MWG in 2015<sup>101</sup>. As part of this investigation, KPRG advanced 20 borings in a grid pattern east of Pond 1N. The Geoprobes were advanced to the top of the dolomite bedrock and composite soil samples of the entire vertical profile were submitted for laboratory analysis using the NLET method for metals. The subsurface materials encountered during this investigation were consistent and homogeneous and consisted of bottom ash/slag from the coal combustion process. The analytical results from this site investigation are presented in **Table 3**.

There were no detections for antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, lead, manganese, mercury, molybdenum, nickel, potassium, selenium, silver, thallium, or zinc in the leachate from any of the samples analyzed and the method detection limits were below the Class I Groundwater Quality Standards. While boron, iron, and sodium were detected, the statistical analysis of the NLET data described in KPRG's report indicated "with a high degree of statistical certainty that the criteria established in 415 ILSC 5/3.135...are met and that the material may be considered CCB relative to this criterion for engineering/beneficial reuse".

The historical data as described above are sufficient to adequately characterize the historical coal ash fill areas at the Will County Station.

<sup>&</sup>lt;sup>101</sup> KPRG, September 8, 2015.

#### 4.2.4 Waukegan

The Waukegan Station was also investigated in 1998, along with the other Stations <sup>102</sup>. The Phase II ESA included the results from 22 soil borings, 5 monitoring wells, 13 surface soil samples, and 6 sediment samples. A summary of the locations of the various samples collected is shown on **Figure 8**. One soil boring (B-22) was installed in the far northern portion of the FS Area to the west of the West Ash pond. This boring was installed to a depth of approximately two feet bgs. The boring log indicated the presence of coal and gray coal ash. A sample was collected from the boring for analysis of several constituents, including RCRA metals. Concentrations of RCRA metals were below laboratory reporting limits or Tier 1 SROs, except for arsenic which was detected at a concentration of 14 mg/kg, slightly above the TACO soil background concentration of 13 mg/kg (which is the applicable SRO under TACO).

As part of the hydrogeologic investigation conducted at the Waukegan Station in 2010, Patrick Engineering installed five wells (MW-1 through MW-5) with wells MW- 6 and 7 added as upgradient wells at the request of Illinois EPA. Monitoring wells MW-8 and MW-9 were installed in 2014<sup>103</sup>. Five additional wells (MW-10, 11, 12, 14 and MW-15) located west of the ash ponds have been monitored since August 2014 to assess the groundwater impacted by the adjoining former Greiss-Pfleger Tannery and General Boiler properties<sup>104</sup>. In its 2019 Interim Order, the Board recognized that groundwater contamination is migrating from the upgradient Greiss-Pfleger Leather Tanning Facility property<sup>105</sup>. In 2003, at the neighboring property owner's request, MWG established an ELUC on the western side of its property as an institutional control to prevent exposure to historically contaminated soil and groundwater that has migrated onto MWG's Waukegan site as the result of past industrial activities on the former Greiss-Pfleger Tannery Site. It is suspected that contamination may also be migrating from the General Boiler Site, also located upgradient of the Waukegan Station<sup>106</sup>.

To evaluate if the FS Area to the west of the West Pond could be contributing to observed groundwater concentrations in MW-5, located downgradient of the former Greiss-Pfleger Tannery and General Boiler properties, KPRG investigated the FS Area in November 2020. KPRG installed 40 probes over a 1,000 ft by 400 ft area and collected 100 samples for the evaluation of

<sup>&</sup>lt;sup>102</sup> ENSR, December 1998.

<sup>&</sup>lt;sup>103</sup> 2019 IPCB Order at 68.

<sup>104</sup> ld.

<sup>&</sup>lt;sup>105</sup> 2019 IPCB Order at 74.

<sup>&</sup>lt;sup>106</sup> 1/30/18 Tr. p. 124:22-125:3; MWG Ex. 623, p. MWG13-15 472.

metals including arsenic, boron, calcium, iron, lithium, manganese, molybdenum and thallium and general chemistry parameters including pH, chloride, and sulfate. In addition, four samples were collected for the analysis of leachable sulfate via the Synthetic Precipitation Leaching Procedure (SPLP) (A8-5-7, B10-5-9, C7-5-10, D5-5-10)<sup>107</sup> and three additional samples were collected for LEAF analysis (A1-0-5, A9-0-5 and C7-0-5)<sup>108</sup>. Sample locations are shown on **Figure** 8 and a summary of the analytical results from the leaching analysis performed during this investigation is included in **Table 4**.

Boring logs indicate the presence of coal ash at depths ranging from near ground surface to approximately 7 to 17 ft. SPLP data indicate one sulfate concentration of 460 milligrams per liter (mg/L) at sample locations B10-5-9, which exceeds the Class I Groundwater Quality Standard of 400 mg/L. All LEAF results for samples at the natural pH are below the applicable Class I Groundwater Quality Standard, with the exception of boron which was detected at a concentration of 5 mg/L, 8.2 mg/L and 13 mg/L at A1-0-5, A9-0-5, and C7-0-5, respectively, each of which exceed the Class I Groundwater Quality Standard of 2 mg/L. In addition, arsenic was detected at a concentration of 0.058 mg/L at A9-0-5 which slightly exceeds the Class I Groundwater Quality Standard of 0.05 mg/L. Based on the results from the November 2020 evaluation, sufficient information is available to determine if a remedy is appropriate to address potential leaching of CCR-related constituents from ash in the FS Area to groundwater at concentrations exceeding Class 1 Groundwater Quality Standards.

The historical data as described above are sufficient to adequately characterize the historical coal ash fill area at the Waukegan Station.

# 4.3 Analysis of the historical groundwater quality data indicates that groundwater concentrations are decreasing at the Joliet 29, Powerton, and Will County Stations.

An extensive database of groundwater quality data has been attained at each Station by MWG over approximately the last decade. Groundwater data have been collected in compliance with both the CCAs and the Federal CCR Rules. WCG conducted statistical testing of these analytical data to evaluate changes in groundwater constituent concentrations over time at each of the Stations. Our analysis included the detection groundwater monitoring constituents under 40 CFR 257 Appendix III. These are the constituents recognized by USEPA as representing the most

<sup>&</sup>lt;sup>107</sup> MWG13-15 79493-79771.

<sup>&</sup>lt;sup>108</sup> MWG13-15 81195-81293.

reliable indications of CCR impacts within groundwater. For completeness, WCG also evaluated trends for the 40 CFR 257 Appendix IV assessment groundwater monitoring constituents.

The monitoring wells evaluated at each Station included the wells that were at the farthest downgradient locations. These wells are most relevant because they best represent groundwater quality after the natural groundwater mechanisms of advective dispersion and attenuation have impacted groundwater concentrations. In most cases, these wells are not necessarily located at the downgradient property boundary, and therefore use of these wells presents a conservative assessment of groundwater quality conditions because further advective dispersion, and attenuation will occur before the groundwater migrates further downgradient, toward the property boundary. The following monitoring wells were included in the trend testing:

- Joliet 29: MW-1, MW-2, MW-3, MW-4, MW-6, and MW-7;
- Powerton: MW-3, MW-4, MW-5, MW-6, MW-7, MW-8, MW-13, MW-14, and MW-15;
- Will Co.: MW-7, MW-8, MW-9, MW-10, MW-11, and MW-12;
- Waukegan: MW-1, MW-2, MW-3, and MW-4.

WCG has performed groundwater monitoring at many solid and hazardous waste disposal facilities since inception of the RCRA Subtitle D regulations in the 1990s. Temporal trends in groundwater quality data are often used to evaluate whether a corrective action is needed or if prior corrective action is having the intended beneficial impact on groundwater quality. In WCG's experience, the most common statistical method for evaluating temporal trends in groundwater quality data is the Mann-Kendall Test for Trend. The Mann-Kendall Test is included in the USEPA Statistical Analysis of Groundwater Monitoring Data At RCRA Facilities Unified Guidance dated March 2009.

The Mann-Kendall test can be utilized to evaluate both upward and downward trends. The statistical software program Sanitas Version 9.6 was utilized to conduct Mann-Kendall trend analyses on the groundwater monitoring data. WCG has found that the Sanitas software is commonly utilized by regulators overseeing groundwater monitoring programs at solid waste landfills regulated under RCRA Subtitle D. Results from the Mann-Kendall Testing are included in **Appendix C**.

The results from the Mann-Kendall Trend testing are summarized in the tables at the front of **Appendix C**. The supporting output from the statistical software is also presented in **Appendix D**, following the summary tables. In summary, the results indicate:

#### Weaver Consultants Group North Central, LLC

- Joliet 29: Of the 132 trend tests performed, 64% exhibited no trend, 26% exhibited a
  downward trend (11/34 statistically significant downward), and 10% exhibited an
  upward trend. Of the data where a trend was observed, 72% of the trends are
  downward and 28% upward.
- Powerton: Of the 233 trend tests performed, 64% exhibited no trend, 30% exhibited a downward trend (25/70 statistically significant downward), and 6% exhibited an upward trend. Of the data where a trend was observed, 82% of the trends are downward and 18% upward.
- Will Co.: Of the 140 trend tests performed, 57% exhibited no trend, 27% exhibited a downward trend (13/38 statistically significant downward), and 16% exhibited an upward trend. Of the data where a trend was observed, 63% of the trends are downward and 37% are upward.
- Waukegan: Of the 135 trend tests performed, 60% exhibited no trend, 19% exhibit a
  downward trend (9/26 statistically significant downward), and 21% exhibited an
  upward trend. Of the data where a trend was observed, 48% of the trends are
  downward and 52% are upward.

Many of the trend tests returned "no trend" results because the majority of the constituents evaluated were reported as not detected by the laboratory. Generally, the laboratory reporting limits are consistent from event to event and thus, results in no trend.

In cases where there were enough results reported above the laboratory detection limit so that meaningful trend testing could be performed, the majority of the trend test results from Joliet 29, Powerton, and Will Co. indicate that groundwater concentrations are decreasing over the approximately 10 years of data available. These results validate the continued applicability of monitored natural attenuation, and the application of the GMZ, as an appropriate remedy.

The trend testing results for Waukegan are not necessarily skewed towards more downward than upward trends. Consequently, WCG's opinions regarding the appropriate remedy for Waukegan are discussed separately below, in Section 4.8.

The groundwater monitoring wells installed by MWG beginning in 2010 and results obtained from the CCA and CCR monitoring programs are sufficient to monitor the natural attenuation occurring at the Stations, as applicable.

### 4.4 There is no unacceptable risk to offsite receptors at the four Stations.

Each of the Stations are bordered by surface water and the shallow groundwater unit at each of the Stations discharges into either the adjacent river or Lake Michigan (in the case of Waukegan). To support the above opinion, WCG conducted an updated evaluation to assess whether the groundwater conditions will result in discharge to surface water at concentrations that meet the applicable surface water quality standards. A similar statistical risk evaluation was presented in the expert opinion of John Seymour<sup>109</sup>. While the concentrations in groundwater will be reduced as the groundwater discharges to surface water and mixes with the surface water, the following evaluation takes the very conservative approach of first excluding the (beneficial) effects of groundwater/surface water mixing. Mixing is only considered in those rare instances where a groundwater concentration slightly exceeded an applicable surface water standard.

Downgradient groundwater sample concentrations were compared to Illinois Water Quality Standards (WQS) included in 35 Ill. Adm. Code Part 302 and Illinois Water Quality Criteria (WQC) for surface water. Downgradient groundwater concentrations were compared to Illinois chronic WQS, or if a WQS was not available, the Illinois chronic WQC. The surface water standards and their sources are provided in **Table 1** in **Appendix D**. No unacceptable risk is deemed present if groundwater concentrations are less than the applicable WQS or WQC for surface water, which are set at levels that are protective of human health and the environment in accordance with the surface water's designated uses.

The surface water comparisons were conducted for CCR constituents listed in Appendices III and IV to 40 CFR Part 257. Appendix III constituents are Constituents for Detection Monitoring and Appendix IV constituents are Constituents for Assessment Monitoring.

For each Station, the extensive dataset from downgradient monitoring wells was averaged using the Sanitas<sup>TM</sup> groundwater statistical software. The mean concentration was calculated by Sanitas<sup>TM</sup> at each sites' respective downgradient monitoring wells is presented in each table included in **Appendix D**. The average groundwater concentration was compared to the surface water standards presented in Table 1 in **Appendix D**. While both chronic and acute surface water standards are presented in Table 1 for completeness, the groundwater data has been compared to the chronic standards, as they are the lower standard. This approach is therefore deemed conservative. If a constituent was reported as non-detect in seventy-five percent (75%) or more

 $<sup>^{\</sup>rm 109}$  MWG Exh. 903. pgs. 44-45 and Appendix B.

in the historical data, then the laboratory reporting limit was presented as the average concentration for that constituent.

#### Joliet 29

Shallow groundwater in the vicinity of the Joliet 29 Station ash ponds discharges to the south of the Station to the Des Plaines River. Groundwater data collected between December 2010 and October 2020 from downgradient monitoring wells (i.e., wells south of the ponds) MW-01 through MW-04, and MW-06 and MW-07 was averaged using the Sanitas<sup>™</sup> groundwater statistical software and compared to applicable surface water standards. For Joliet 29, average groundwater concentrations at downgradient monitoring wells did not exceed surface water standards.

#### **Powerton**

Shallow groundwater in the vicinity of the Powerton Station ash ponds discharges to the north and west. Groundwater data collected between December 2010 and December 2020 from downgradient monitoring wells MW-03 through MW-08 and MW-13 through MW-15 was averaged using the Sanitas<sup>TM</sup> groundwater statistical software and compared to applicable surface water standards. For Powerton, average groundwater concentrations at downgradient monitoring wells did not exceed surface water standards.

#### Will County

Shallow groundwater in the vicinity of the Will County Station ash ponds discharges west to the adjacent Des Plaines River. Groundwater data collected between December 2010 and November 2020 from downgradient monitoring wells MW-07 through MW-12 was averaged using the Sanitas™ groundwater statistical software and compared to applicable surface water standards. Apart from pH at monitoring well MW-09, the Will County average groundwater concentrations at downgradient monitoring wells did not exceed the applicable surface water standards. At MW-09, the average pH concentration of 9.22 slightly exceeded the applicable pH range of 6.5-9.0 for surface water. However, MW-9 is located approximately 120 feet upgradient of the downgradient property boundary, which approximately coincides with the Des Plaines River. Groundwater flowing from MW-09 to the west towards the Des Plaines River will undergo further advection dispersion and attenuation. Additionally, the mixing that occurs as groundwater discharges into surface water will further moderate the pH. Therefore, the average pH concentration of 9.22 at MW-09 does not pose an unacceptable risk to surface water receptors in the Des Plaines River.

#### Waukegan

Shallow groundwater in the vicinity of the Waukegan Station ash ponds discharges to the east to adjacent Lake Michigan. Groundwater data collected between December 2010 and November 2020 from downgradient monitoring wells MW-01 through MW-4 was averaged using the Sanitas<sup>TM</sup> groundwater statistical software. Except for pH at monitoring well MW-01, the Waukegan average groundwater concentrations at downgradient monitoring wells did not exceed the applicable surface water standards for the Lake Michigan Basin. At MW-01, the average pH concentration of 9.74 slightly exceeded the applicable pH range of 6.5-9.0 for surface water. However, MW-1 is located over 700 feet upgradient from the existing shore of Lake Michigan. Groundwater flowing from MW-01 to the east towards Lake Michigan will undergo further advection dispersion and attenuation. Additionally, the mixing that occurs as groundwater discharges into surface water will further moderate the pH. Therefore, the average pH concentration of 9.74 at MW-01 does not pose an unacceptable risk to potential surface water receptors in Lake Michigan.

The results of the surface water risk evaluation indicate that downgradient groundwater conditions at each of the four Stations do not pose unacceptable risks to surface water receptors. WCG's opinion is consistent with the export report of John Seymour, who concluded that it was his opinion that "groundwater conditions do not pose risks to surface water receptors<sup>110</sup>."

4.5 MWG has already committed to following the Federal/State CCR Rules for applicable Existing and Inactive Surface Impoundments at each Station, until closure is complete. Therefore, no additional action beyond continued compliance with these Rules is warranted.

MWG has been operating the active surface impoundments in a manner that minimizes potential impacts to groundwater. Regarding the liners previously installed at the Federal CCR Surface Impoundments, it is WCG's opinion that the prior and current liners are consistent with industry practice for this type of application and are effective at containing the materials managed in the surface impoundments. However, the existing HDPE liners — even though many were required by the CCAs and approved by Illinois EPA when installed — do not meet the Federal CCR Rules which require a dual liner. MWG has opted to close the surface impoundments.

**Weaver Consultants Group North Central, LLC** 

<sup>&</sup>lt;sup>110</sup> MWG Exh. 903. pg. 44.

Regular inspections occur at each Station to ensure that design, construction, operation, and maintenance of the CCR units are consistent with recognized generally accepted good engineering standards 111112113.

In addition, MWG implemented a detection monitoring program at Joliet 29, Will County, and Waukegan Stations to identify potential impacts to groundwater from the regulated impoundments. An assessment program is being implemented at the Powerton Station. Further assessment monitoring will be implemented at the other Stations if statistically significant increases attributable to the regulated units are confirmed. Corrective action will be conducted if assessment monitoring data indicates that the groundwater protection standards are exceeded. MWG continues to upload reports associated with these activities as well as other technical reports to the website for CCR Rule Compliance Data and Information<sup>114</sup>. Also, the recently adopted Illinois CCR Rule does not distinguish between detection monitoring and assessment monitoring. Instead, pursuant to the Illinois EPA Rule, beginning in the second quarter of 2021, MWG will be sampling the groundwater for all of the constituents identified in the federal CCR rule pursuant to 35 Ill. Adm. Code 845.600.

Pursuant to the Federal CCR Rules, MWG prepared Closure Plans for the regulated surface impoundments at each of the Stations, including Pond 2 at Joliet 29<sup>115</sup>, the Ash Surge Basin, Bypass Basin<sup>116</sup>, and the Former Ash Basin<sup>117</sup> at Powerton, the South Ash Ponds 2S and 3S at Will County<sup>118</sup>, and the East and West Ash Basins at Waukegan<sup>119</sup>.

As discussed in Section 1.5, in compliance with the Federal CCR Rules, MWG has prepared and submitted to the USEPA Alternative Closure Demonstrations (ACD) related to the infeasibility of

#### Weaver Consultants Group North Central, LLC

<sup>&</sup>lt;sup>111</sup> Annual Inspection Reports for Ash Pond 2 at Joliet 29 Station, October 2020, Ash Surge Basin and Bypass Basin at Powerton Station, January 2016, October 2018, October 2019, October 2020; Annual Inspection Reports for Former Ash Basin at Powerton Station, July 2017, July 2018, July 2019, July 2020; and Annual Inspection Reports for East Ash Pond and West Ash Pond at Waukegan Station, January 2016, October 2018, October 2019, October 2020.

<sup>&</sup>lt;sup>112</sup> MWG Ex. 903, p. 38; 1/31/18 Tr. p. 145:2-23 and p. 145:18-146:3 (Test. of Kelly); 10/24/17 Tr. p. 126:20-127:6 (Test. of Lux); 1/31/18 Tr. p. 237:20-23 and p. 257:15-258:4 (Test. of Veenbaas); 10/24/18 Tr. p. 222:18-223:8 (Test. of Maddox).

<sup>&</sup>lt;sup>113</sup> Op. cit. footnote 47.

<sup>&</sup>lt;sup>114</sup> NRG website for CCR Rule Compliance Data and Information available at: https://www.nrg.com/legal/coal-combustion-residuals.html.

<sup>&</sup>lt;sup>115</sup> Closure Plan for Ash Pond 2 at the Joliet 29 Station, October 2016.

<sup>&</sup>lt;sup>116</sup> Closure Plan for the Ash Surge Basin and Bypass Basin at the Powerton Station, October 2016.

<sup>&</sup>lt;sup>117</sup> Closure Plan for the Former Ash Basin at the Powerton Station, April 2018 as amended in May 2019.

<sup>&</sup>lt;sup>118</sup> Closure Plan for the South Ash Ponds 2S and 3 S at the Will County Station, October 2016.

<sup>&</sup>lt;sup>119</sup> Closure Plan for the East and West Ash Basins at the Waukegan Station, October 2016.

the development of alternative capacity for the Ash Surge Basin at Powerton, Ash Pond 2S at Will County and the East Ash Pond at Waukegan. Continued operation of the CCR Ponds until the alternate closure deadlines identified for each Station will be monitored to mitigate any potential impacts to groundwater. The detection and assessment groundwater monitoring programs implemented by MWG are designed to identify potential issues with the regulated impoundments until such time that the ponds are taken out of service and formally closed in accordance with the applicable permits. According to IL Public Act 101-171, signed into law July 30, 2019, closure activities related to Federal/State Ponds cannot be completed until a permit is attained from Illinois EPA.

Contrary to Quarles's opinion, the scope of the ASDs associated with the Powerton, Will Co., and Waukegan Stations is appropriate and complies with the Federal CCR Rules and likely also the Illinois CCR Rules. Quarles's suggestion that MWG should have used the ASD process to specifically identify the source of statistically significant increases in groundwater concentrations is incorrect. It is not appropriate nor required by the Federal CCR Rules or the Illinois CCR Rules to pursue additional investigation of non-regulated units as part of this process. The Federal CCR Rules and the Illinois CCR Rules require the owner/operator to evaluate whether the *regulated unit(s)* are adversely impacting groundwater, but neither require an exhaustive site-wide study to identify a specific alternate source.

Moreover, additional investigation is not needed for purposes of identifying the appropriate relief/remedy related to groundwater conditions attributed by the Board to MWG. The appropriate action recommended by WCG is based on the existing applicable regulatory framework and data historically collected at the Stations.

In closing, no additional relief is warranted at the Stations with respect to Section 33(c), criteria (i), the character and degree of injury to, or interference with the protection of the health, general welfare, and physical property of the people. MWG is actively complying with the detection and assessment groundwater monitoring requirements of the Federal CCR Rules at these Stations and has created a long-term plan for closure of the regulated active and inactive CCR surface impoundments, as appropriate. The plans comply with the existing Federal CCR Rules and MWG is aware of, and further intends to comply with the IL CCR Rules, once promulgated.

# 4.6 MWG should continue to maintain the GMZs at each Station until the corrective action is complete.

GMZs have been established at Joliet 29, Powerton, and Will County Stations. The GMZs are a component of corrective action included in the CCAs implemented for the Joliet, Powerton and Will County Stations. A GMZ would not have been approved by the Illinois EPA if a specific means for managing the groundwater was not implemented. The means for managing the groundwater for the three Stations is deemed to be the various corrective measures specified in the CCAs, including:

- Upgrades to various CCR surface impoundment liners;
- Installation of the dewatering system at Will County Ponds 1N and 1S; and
- At Powerton, the East Yard Run-off Basin was not to be used as part of the ash sluicing flow system and no unlined areas may be used for temporary or permanent management of CCR.

The GMZ also includes conducting long-term groundwater monitoring to confirm the effectiveness of the corrective measures included in the CCAs, and the maintenance of institutional controls to prevent potential exposures to groundwater containing CCR-related constituents at concentrations above Class I Groundwater Quality Standards. The 2020 Board Order specifically clarifies that "(t)he Board is aware that the process of monitored natural attenuation (MNA) can be, by its nature, a long one. Monitored natural attenuation, depending upon its efficacy and subject to the Agency's review, can conceivably last for many years." 120

WCG agrees that MNA is a long-term process, which may require multiple decades to complete. WCG recommends that MWG maintain the GMZs and continue the groundwater monitoring until the corrective actions through MNA are complete. Because there are no off-site complete or potentially complete exposure pathways, that the MNA may take time would not result in unacceptable impact to human health or the environment at the Stations. Additionally, as discussed further below in Section 4.8, WCG recommends implementation of a remedy at the Waukegan Station, which includes the establishment of a GMZ.

<sup>&</sup>lt;sup>120</sup> Board Opinion, February 6, 2020, pg. 13.

# 4.7 No further remedy is warranted at the Joliet 29, Powerton, and Will County Stations.

As discussed in Section 4.5, MWG has already committed to following the Federal/State CCR Rules for applicable Existing and Inactive Surface Impoundments at each Station, until closure is complete. Therefore, no additional action beyond continued compliance with these Rules is warranted for these regulated areas of the Stations. In addition, Section 4.3 demonstrates that detections of CCR-related constituents in groundwater at the Joliet 29, Powerton, and Will County Stations are decreasing through natural attenuation. The institutional controls in place at each of the Stations are sufficient to control potential on-site exposures to impacted groundwater while corrective action activities previously implemented under the prior CCAs continue to take effect. Illinois regulatory programs rely on institutional controls when a riskbased evaluation indicates that potential exposures to impacted media may be managed by the implementation of these corrective actions. GMZs and ELUCs are proven as effective, industryaccepted remedial approaches approved by the State of Illinois to adequately control exposure to impacted groundwater. These types of controls can be implemented in lieu of active remediation, when exposures can be controlled. Risk-based remediation is particularly beneficial at sites like the MWG Stations, where both the properties and surrounding areas are industrial in nature and site access can be controlled. Further, as discussed in Section 4.4, there are no offsite complete or potentially complete exposure pathways that would result in unacceptable impact to human health or the environment at the Stations. The administrative record is clear that there are no off-site downgradient potable use wells at any of the Stations, and a review of the Annual CCR Fugitive Dust Reports indicate that there are no significant issues with fugitive dust at the Stations or citizen complaints related to dust originating from the Stations.

Additional support for continuing to utilize monitored natural attenuation at these three Stations includes:

- Groundwater monitoring will continue to be performed while the GMZs are in place, to confirm monitored natural attenuation continues to be effective;
- As discussed above, the existing regulatory framework does not require additional action at the historical fill areas; and
- Illinois EPA has not identified any noncompliance with the CCAs or pursued any enforcement action against MWG, since the CCAs were signed in 2012.

Because the statistical evaluation indicates that natural attenuation is occurring and that there is no unacceptable risk to human health or the environment, no further remedy is required at Joliet 29, Powerton, or Will County Stations to address the regulated CCR units or the historical fill areas.

# 4.8 Despite the absence of risk, an appropriate remedy is warranted at the Waukegan FS Area to attain compliance with applicable regulations.

The 2020 KRPG investigation<sup>121</sup> indicates that impacts to groundwater at MW-5, MW-7 and MW-16 (downgradient of the FS Area) are potentially caused by leaching of materials at the FS Area. Additionally, migration of impacted groundwater from the upgradient General Boiler and Tannery properties is occurring<sup>122</sup>. The evaluation of groundwater data in Section 4.4 demonstrates that concentrations of CCR-related analytes are attenuating below applicable surface water quality criteria before groundwater leaves the property. However, the statistical evaluation of the groundwater concentration trends in samples collected from downgradient wells at Waukegan indicates that supplemental activities may be implemented to enhance natural attenuation of groundwater underlying the Station.

Therefore, it is WCG's opinion that a presumptive remedy in the form of a low permeability cap be installed in the FS Area in order to enhance the natural attenuation remedy. A presumptive remedy is a technology that regulators believe, based upon prior experience, will be the most appropriate remedy for a specified type of site. Use of presumptive remedies accelerates the remedial alternatives analysis. Capping is a proven remedial technology that has been used for decades and is particularly prevalent as a means of closing solid and hazardous waste landfills, and surface impoundments (usually after removal of liquids) under RCRA.

Capping of the FS Area would reduce infiltration, leading to a decrease in water percolation through the coal ash materials. It is anticipated that this reduction in percolation will significantly decrease leaching from coal ash materials within the FS area. The installation of the cap is expected to reduce the time required for natural attenuation to restore groundwater concentrations to Class I Groundwater Quality Standards.

<sup>&</sup>lt;sup>121</sup> MWG-13-15 79493-79771; MWG13-15 81195-81293.

<sup>&</sup>lt;sup>122</sup> MWG Ex. 644; MWG13-15\_46627 -46630; 1/30/18 Tr. pp. 135:23-136:18, 138:3-139:3,155:10-21 (Test. of Race); MWG Ex. 644, p.; 1/30/18 Tr. p. 136:19-138:1 (Test. of Race).; Ex. 19D, p MWG13-15 45800.

An evaluation of the potential to reduce infiltration via the installation of a low permeability cap at the FS Area was modeled with the Hydrologic Evaluation of Landfill Performance (HELP) Model, Version 3.07. The results from the HELP Model are presented in **Appendix E**. According to the model results, a cap would significantly reduce infiltration and thereby would be expected to mitigate potential leaching from ash materials to groundwater.

WCG recommends that, if implemented, the cap should be designed specifically for the Waukegan Station by a Professional Engineer licensed in Illinois in consideration of site-specific performance-based infiltration reduction goals. In addition, WCG recommends that initiation of the design of the cap wait until the Board has finalized its rulemaking in the sub-docket A of R20-19 to explore "historic, unconsolidated coal ash fill in the State", located outside of surface impoundments. Because WCG has confirmed that there is no risk to Lake Michigan or other potential offsite receptors and groundwater use on-site is controlled by the ELUC, staying initiation of the corrective actions will not harm the environment nor public health and will also ensure that the corrective actions taken for the FS Area are in compliance with the Board's final rule in R20-19(A).

WCG believes that it is both technically practicable and economically reasonable to implement a low permeability cap for the FS Area. The estimated cost of a low permeability cap is variable and could range from approximately \$1.9 million to \$3.3 million, depending upon the performance objectives of the cap. The ultimate performance objectives are expected to be informed by regulatory standards, remedial goals, technical practicability and implementability, among other considerations.

A GMZ should be established in conjunction with the implementation of the cap corrective action. When the GMZ is established, the Class I Groundwater Quality Standards are inapplicable, while monitored natural attenuation is occurring in the groundwater at the Station.

# 4.9 Relevant Section 33(c) and 42(h) Criteria

The record reviewed by WCG and discussed in this Report indicates that all the Stations are located in industrial areas. This is a factor the Board considers under 33(c) of the Act when making its orders and determinations.

The Stations are each surrounded by other industries and commercial properties. Each of the Stations have been at their current location for at least 50 years and nearly 100 years in the case of Powerton and Waukegan Stations. Joliet 29 and Will County were established later, built in 1964 and 1955, respectively. Powerton and Waukegan were both built in the 1920s and are also

surrounded by industrial properties and in many cases, the industrial development surrounding the Stations occurred after original construction of the Stations. For example, Waukegan is surrounded by properties that have historic contamination from prior uses, including the Superfund sites such as the Johns Manville Site to the north, and the General Boiler and Greiss-Pfleger Tannery sites to the west. A SRP site that previously attained a NFR Letter also adjoins the Joliet 29 Station, on the west side. Based upon the age of the Stations and that they are all in industrial areas, the existing environmental conditions are suitable for the areas in which they are located.

It is common in most Federal and State environmental remediation programs to utilize risk-based remedial goals as the basis of a remedial approach. Illinois EPA's method for developing remediation objectives for contaminated soil and groundwater is known as TACO. Remediation objectives developed under TACO protect human health and the environment, take into account site conditions and land use, and are risk-based and site-specific. Therefore, even those adjacent properties that have been, or are currently enrolled within a regulatory program have some level of residual impact corresponding to compliance with risk-based goals. These risk-based goals may consider engineering and institutional controls to preclude exposures to impacted material (such as the ELUCs already established for the Greiss-Pfleger Tannery west of the Waukegan Station and the former Caterpillar facility west of the Joliet 29 Station) which allow impacted materials to remain in-place, if there are no unacceptable hazards posed to human health or the environment. The Stations are located within areas that are known or suspected to be similarly impacted by long-term industrial land use.

Another factor included in Section 33(c) of the Act is technical practicability and economic reasonableness. MWG has already implemented multiple measures at the CCR surface impoundments and historical fill areas, including implementing corrective actions (relining the ponds and establishing institutional controls that prevent access to the groundwater). In addition, MWG has implemented GMZs to address violations of Class I Groundwater Quality Standards, while the monitored natural attenuation corrective action at the Joliet 29, Powerton and Will County Stations continues to be implemented. The GMZs were established in accordance with 35 Ill. Adm. Code Section 620.250, which indicates that a GMZ may be established to mitigate impairment caused by the release of contaminants from a site: *that is subject to a correction action process approved by the Agency* (emphasis added) or for which the owner or operator undertakes an adequate corrective action in a timely and appropriate manner and provides a written confirmation to the Agency. Therefore, in the case of Joliet 29, Powerton and Will County, the GMZs were established as part of a corrective action process that

has been approved by a regulatory agency. Illinois EPA has not required or requested MWG conduct additional corrective action after establishment of the CCAs.

Duration and gravity of the violation is also listed in Section 33(c) of the Act as a factor utilized by the Board to determine an appropriate remedy. The 2020 Board Order indicates that the violations of Part 620 of the Board regulations do not apply, given the ongoing nature of the previously established GMZs at Joliet 29, Powerton, and Will County. Thus, the duration of the Part 620 violations was limited to the first identification of an exceedance of the Class 1 Groundwater Quality Standards in late 2010, until the GMZs were formally established in 2013.

The comparison of groundwater data to surface water quality standards presented above in Section 4.4 provides further evidence for the lack of gravity of the violations. This evaluation indicates that surface water, including related receptors, will not be adversely impacted by the groundwater concentrations at the Stations. Minimal gravity of the noted violations is also exhibited based on the incomplete exposure pathway for groundwater. Human consumption of groundwater at each of the Stations is controlled using various ELUCs, which prohibit the installation and use of groundwater for potable purposes. In any case, there are no downgradient potable receptors at any of the Stations.

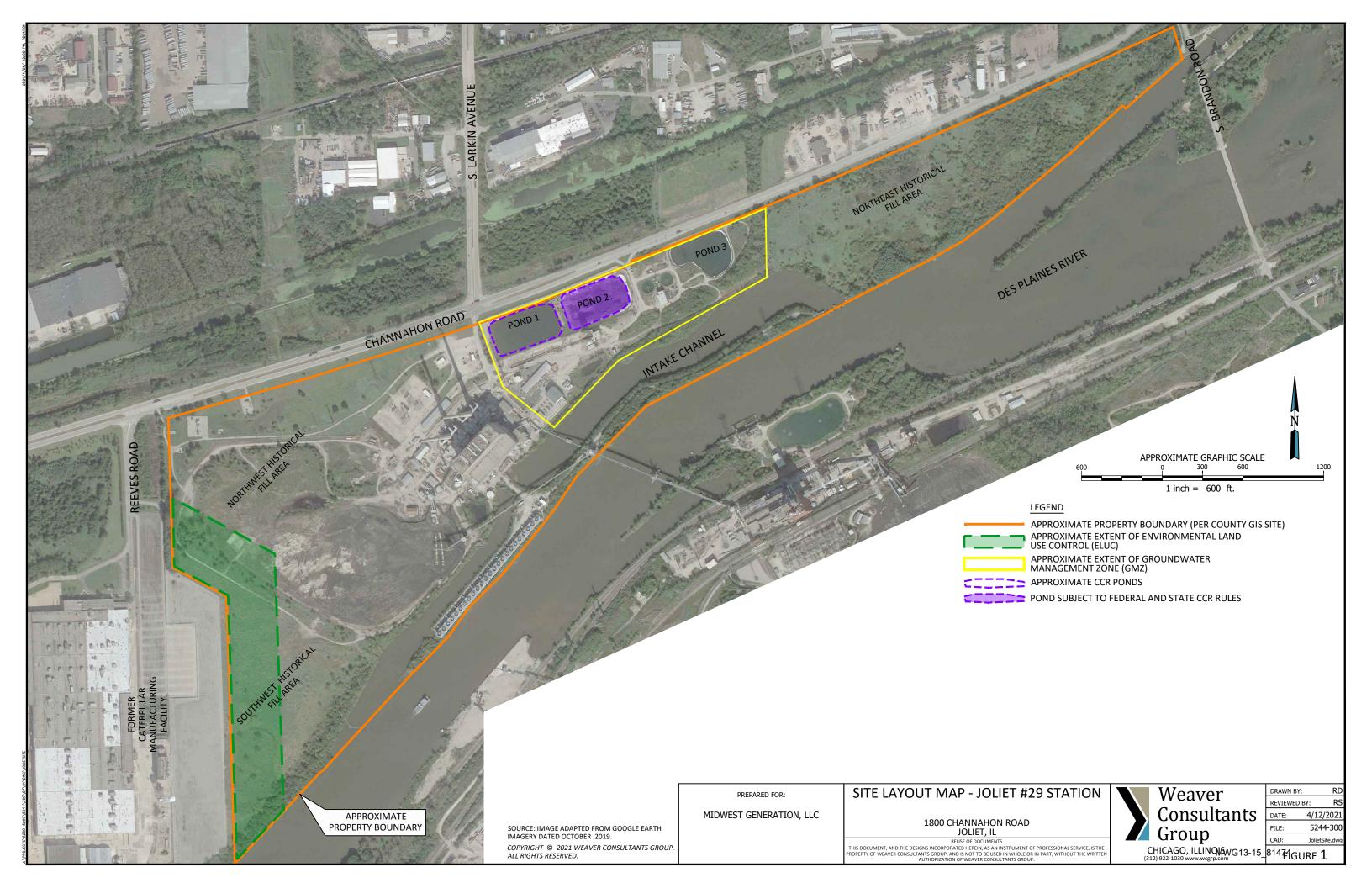
The record indicates that the violation of Section 12(d) of the Act at the Powerton Station was based on temporarily storing coal ash outside of the surface impoundments during a single occasion lasting approximately two to three months during the winter before 2012<sup>123</sup>. The condition was corrected and the materials were removed. Moreover, storage during the winter, when the ground would have been frozen further decreasing the likelihood that runoff from the coal ash could have infiltrated the ground and subsequently impacted groundwater, thus further decreasing the gravity of what was already an event of very limited duration.

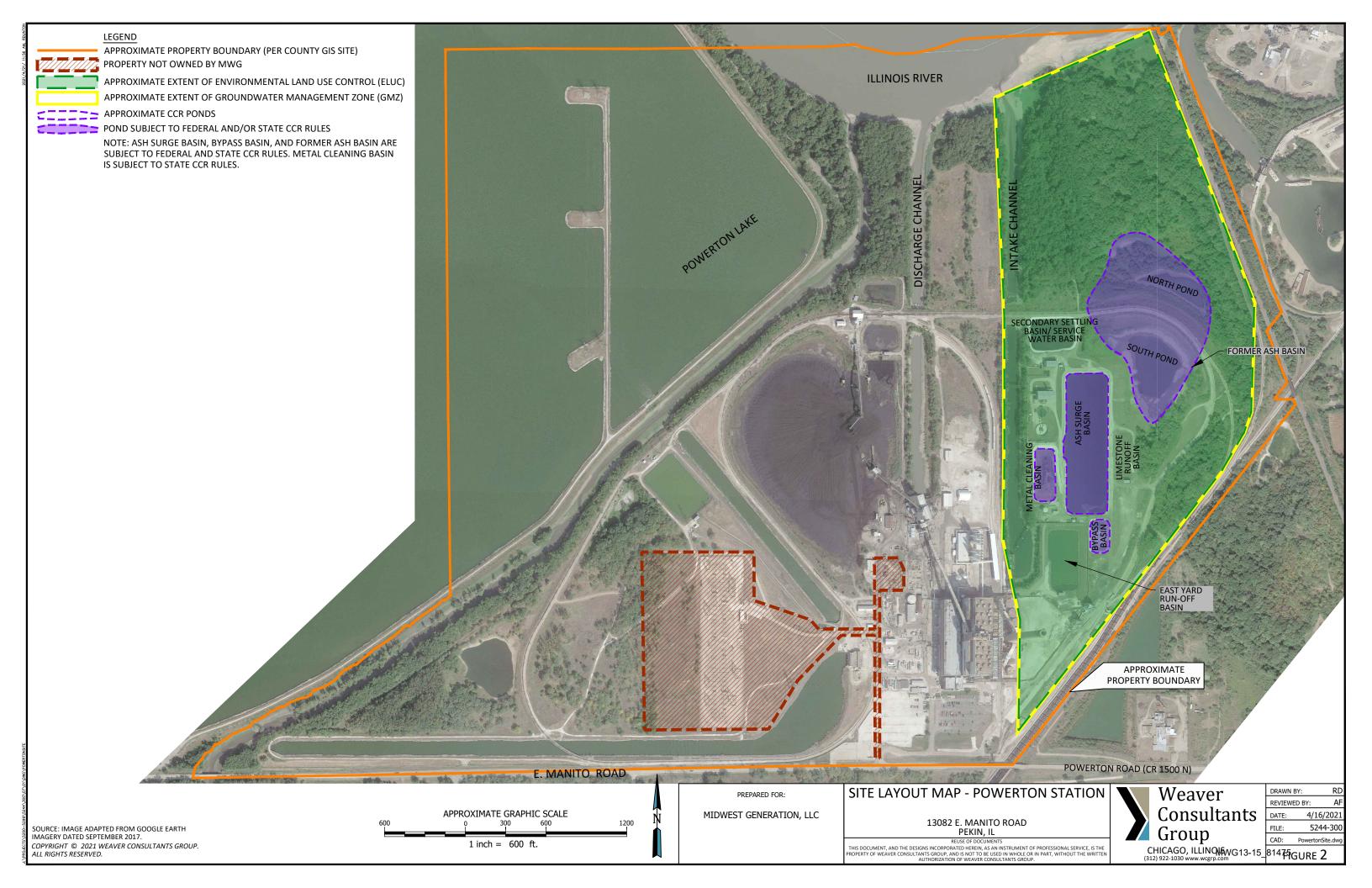
Due diligence in attempting to comply is another 33(c) factor supporting WCG's opinion. MWG proactively undertook appropriate investigation of the Stations prior to any agency request beginning in 2002, voluntarily agreed to perform a hydrogeologic assessment and later sampling (where other utilities did not) in 2008-2010 and implemented the CCAs under oversight by the Illinois EPA. MWG consistently attempted to act diligently, based on: early site investigations, sampling for CCB, relining ponds, CCAs (and related GMZs/ELUCs) and other investigations discussed above.

**Weaver Consultants Group North Central, LLC** 

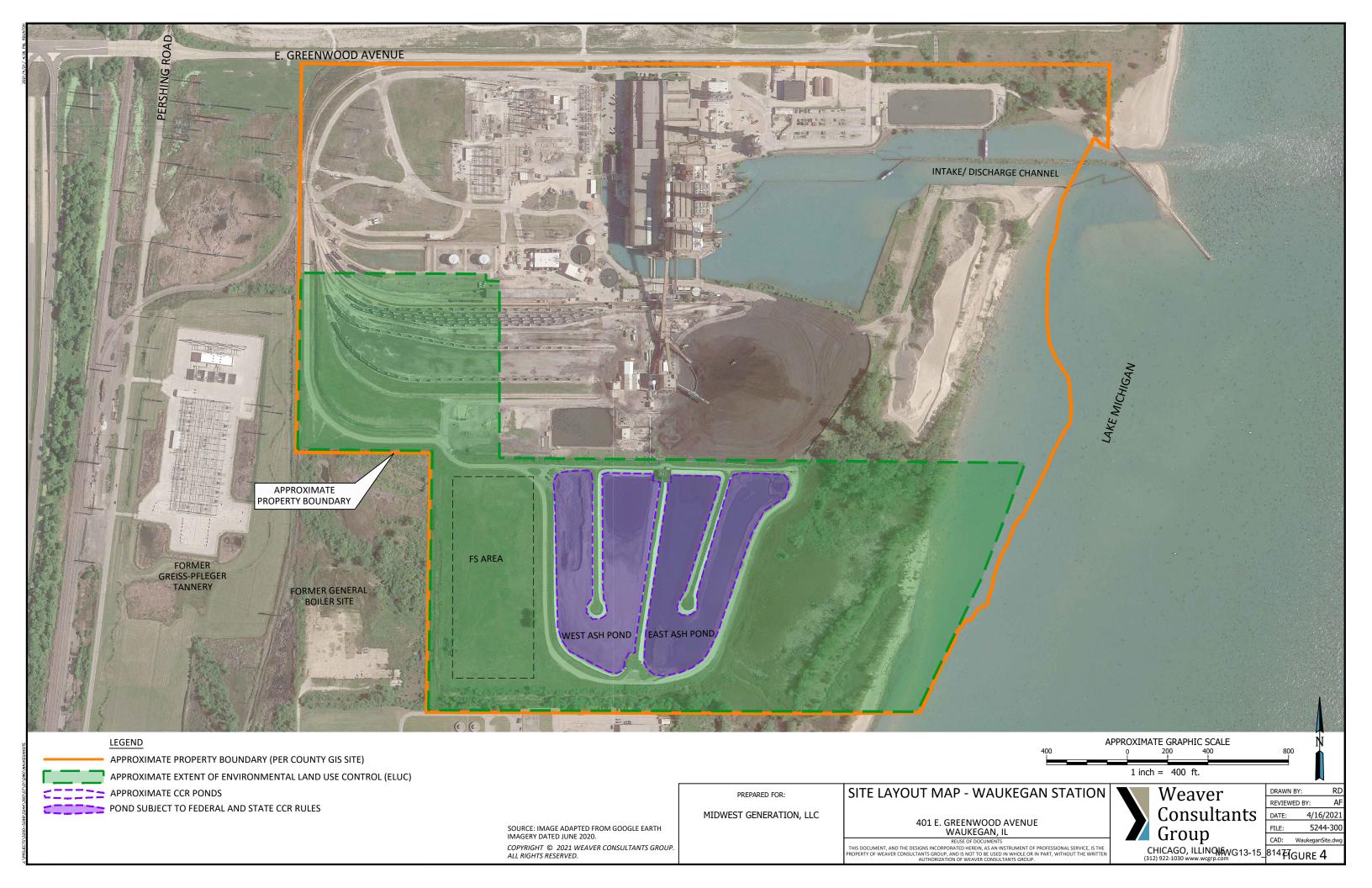
<sup>&</sup>lt;sup>123</sup>2019 Board Order, pg. 42.

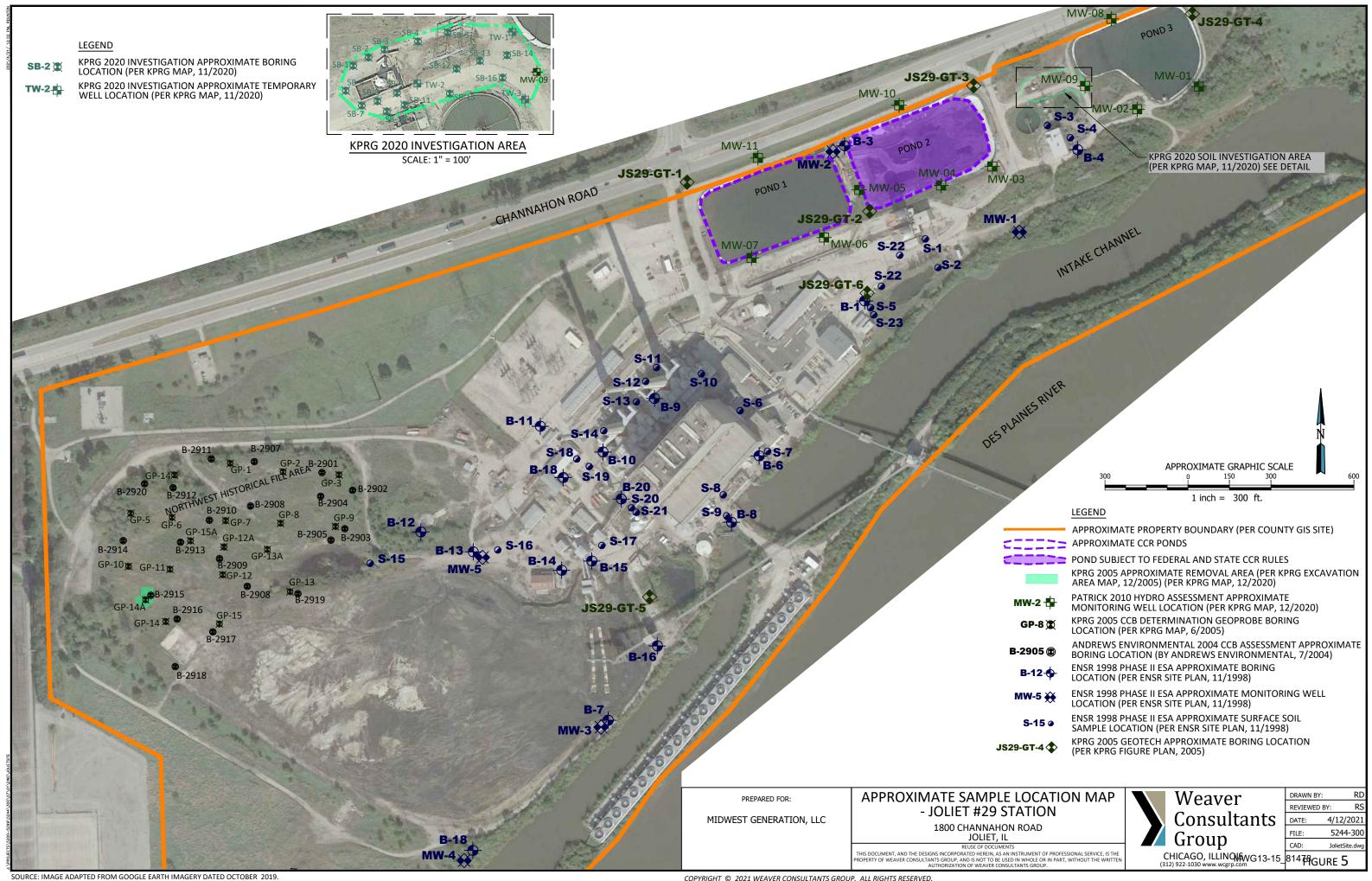
**Figures** 











# LEGEND APPROXIMATE PROPERTY BOUNDARY (PER COUNTY GIS SITE) PROPERTY NOT OWNED BY MWG APPROXIMATE CCR PONDS POND SUBJECT TO FEDERAL AND/OR STATE CCR RULES NOTE: ASH SURGE BASIN, BYPASS BASIN, AND FORMER ASH BASIN ARE SUBJECT TO FEDERAL AND STATE CCR RULES. METAL CLEANING BASIN IS SUBJECT TO STATE CCR RULES.

PATRICK 2010 HYDRO ASSESSMENT/KPRG 2012-2019 CCR APPROXIMATE MONITORING WELL LOCATION (PER KPRG MAP, 12/2020) MW-2 🖶

ENSR 1998 PHASE II ESA APPROXIMATE BORING B-12 LOCATION (PER ENSR SITE PLAN, 11/1998)

ENSR 1998 PHASE II ESA APPROXIMATE MONITORING WELL LOCATION (PER ENSR SITE PLAN, 11/1998)

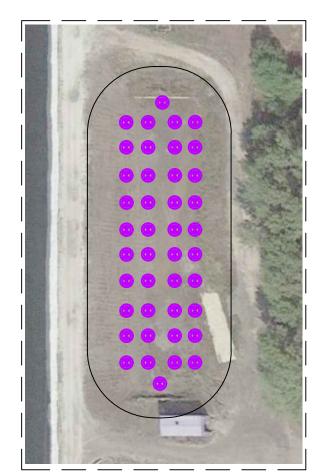
ENSR 1998 PHASE II ESA APPROXIMATE SURFACE SOIL SAMPLE LOCATION (PER ENSR SITE PLAN, 11/1998)

ENSR 1998 PHASE II ESA APPROXIMATE SEDIMENT SAMPLE LOCATION (PER ENSR SITE PLAN, 11/1998)

ANDREWS 2004 BASIN SAMPLING APPROXIMATE TEST PIT LOCATION (PER ANDREWS SITE MAP, 6/2004)

KPRG 2005 GEOTECH APPROXIMATE BORING LOCATION (PER KPRG FIGURE PLAN, 2005)

ASH AND WATER SAMPLES COLLECTED FROM THE BYPASS BASIN AND ASH SURGE BASIN IN 2018 AND 2019 AS PART OF 2019 AND

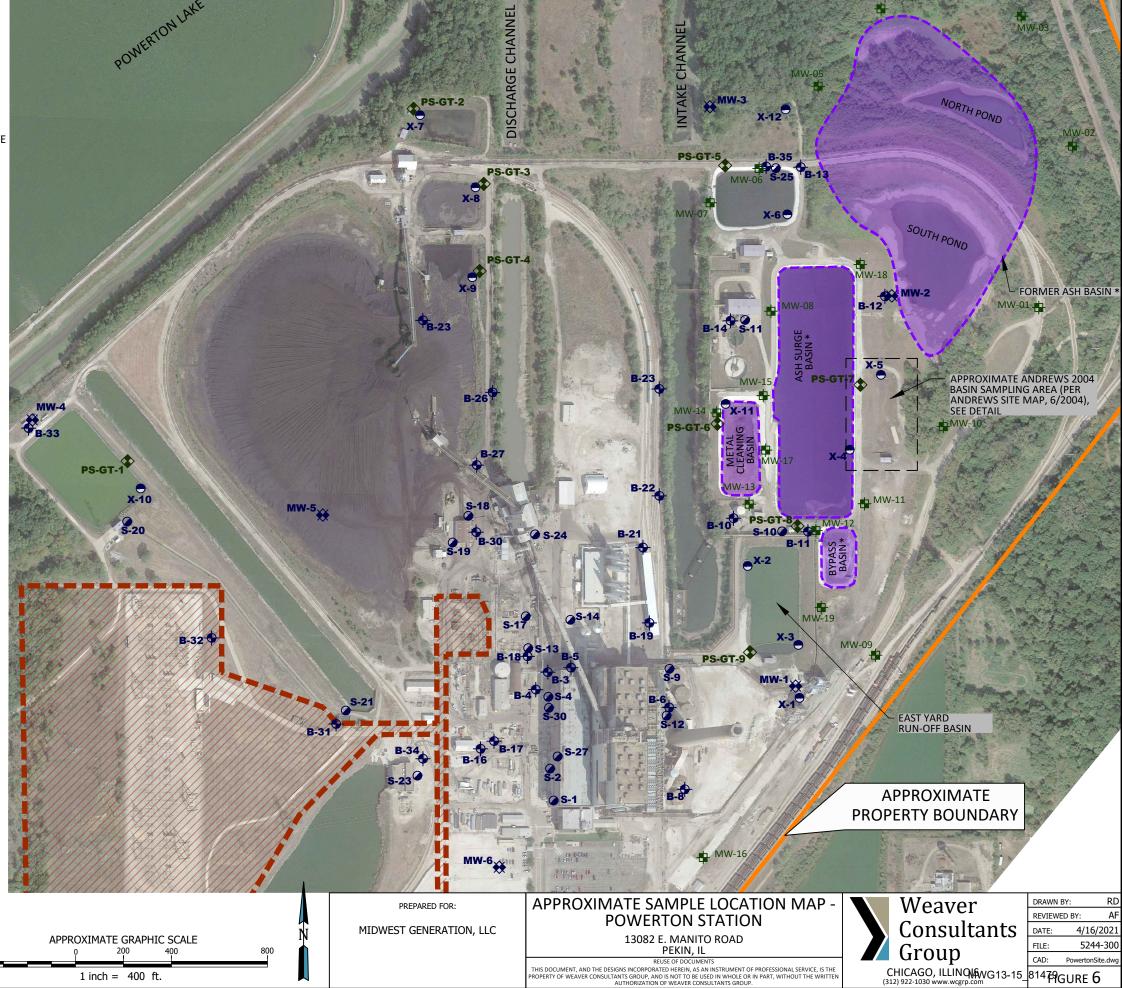


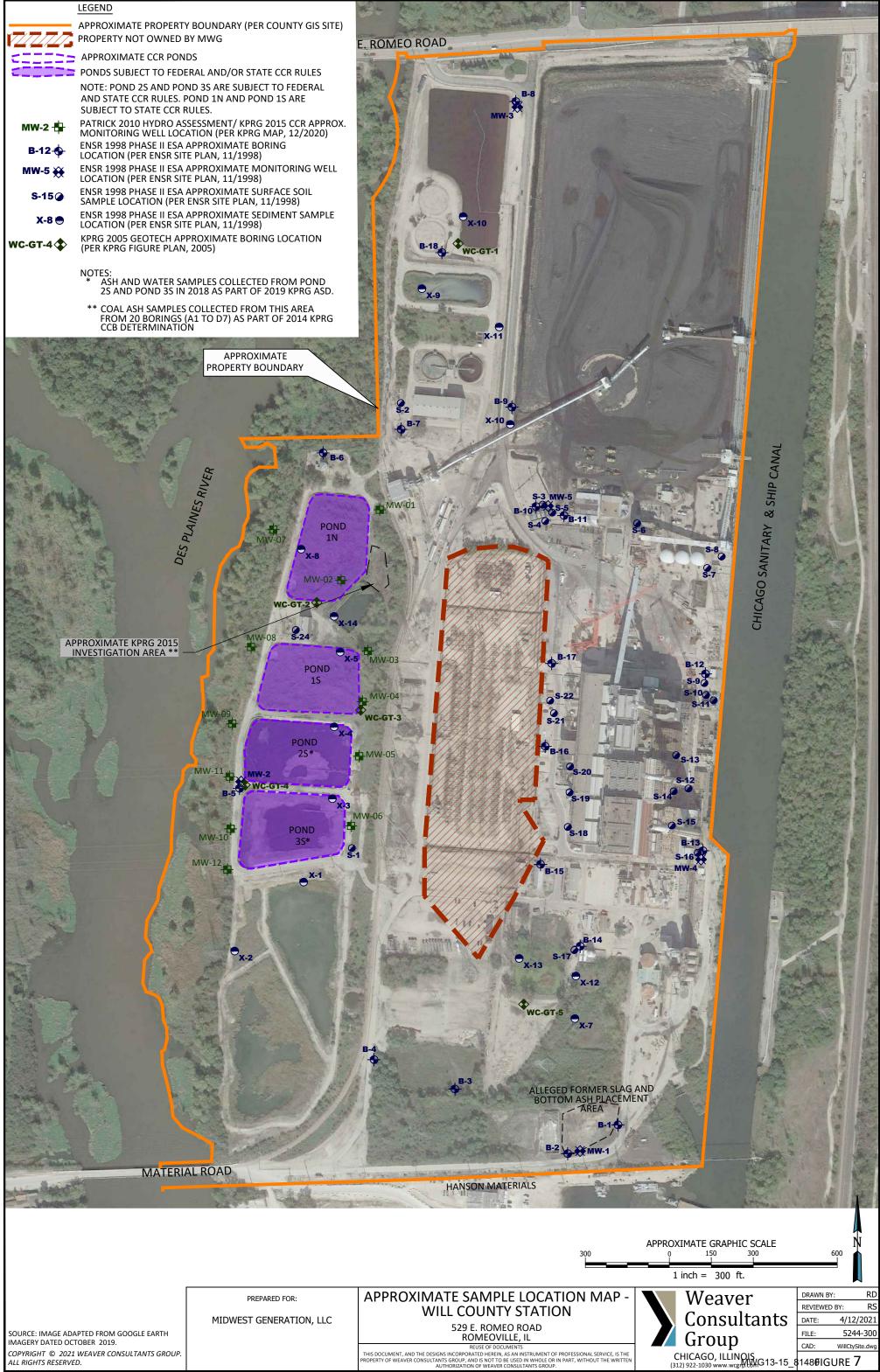
ANDREWS 2004 BASIN SAMPLING AREA

SCALE: 1" = 100'

NOTE: SAMPLE LOCATIONS PER ANDREWS SITE MAP, 6/2004. UNABLE TO DISCERN TEST PIT NUMBERING DUE TO IMAGE QUALITY, REFER TO ANDREWS REPORT FOR CLARITY.

SOURCE: IMAGE ADAPTED FROM GOOGLE EARTH IMAGERY DATED SEPTEMBER 2017. COPYRIGHT © 2021 WEAVER CONSULTANTS GROUP. ALL RIGHTS RESERVED.



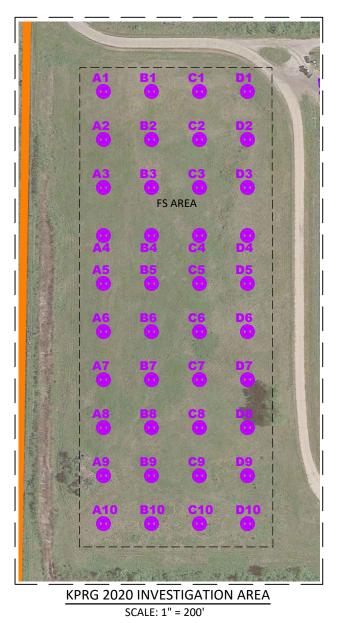


IMAGERY DATED OCTOBER 2019. COPYRIGHT © 2021 WEAVER CONSULTANTS GROUP. ALL RIGHTS RESERVED.

REUSE OF DOCUMENTS

THIS DOCUMENT, AND THE DESIGNS INCORPORATED HEREIN, AS AN INSTRUMENT OF PROFESSIONAL SERVICE, IS THE ROPERTY OF WEAVER CONSULTANTS GROUP, AND IS NOT TO BE USED IN WHOLE OR IN PART, WITHOUT THE WRITTEN AUTHORIZATION OF WEAVER CONSULTANTS GROUP.

WillCtySite.dv



#### LEGEND

APPROXIMATE PROPERTY BOUNDARY (PER COUNTY GIS SITE)

APPROXIMATE CCR PONDS

POND SUBJECT TO FEDERAL AND STATE CCR RULES

PATRICK 2010 HYDRO ASSESSMENT/KPRG 2010-2014 CCR APPROX. MONITORING WELL LOCATION (PER KPRG MAP, 11/2020) MW-2 🖶

ENSR 1998 PHASE II ESA APPROXIMATE BORING LOCATION (PER ENSR SITE PLAN, 11/1998) B-12

ENSR 1998 PHASE II ESA APPROXIMATE MONITORING WELL

LOCATION (PER ENSR SITE PLAN, 11/1998)

ENSR 1998 PHASE II ESA APPROXIMATE SURFACE SOIL SAMPLE LOCATION (PER ENSR SITE PLAN, 11/1998)

ENSR 1998 PHASE II ESA APPROXIMATE SEDIMENT SAMPLE LOCATION (PER ENSR SITE PLAN, 11/1998)

KPRG 2020 INVESTIGATION APPROXIMATE SAMPLING LOCATION (PER RUETTIGER, TONELLI & ASSOC. INC. PLAN, 11/2020)

KPRG 2005 GEOTECH APPROXIMATE BORING LOCATION (PER KPRG FIGURE PLAN, 2005) WS-GT-4

ASH AND WATER SAMPLES COLLECTED FROM THE EAST AND WEST ASH PONDS IN 2018 AS PART OF 2019 KPRG ASD. BOTTOM ASH SAMPLES (BOTTOM ASH-1, BOTTOM ASH-2, AND BOTTOM ASH1/2) COLLECTED FROM EAST AND WEST ASH PONDS AS PART OF KPRG 2004 SAMPLING.

APPROXIMATE PROPERTY BOUNDARY

E. GREENWOOD AVENUE

APPROXIMATE KPRG 2020 INVESTIGATION AREA (PER KPRG SITE MAP, 11/2020), SEE DETAIL

SOURCE: IMAGE ADAPTED FROM GOOGLE EARTH IMAGERY DATED JUNE 2020.

COPYRIGHT © 2021 WEAVER CONSULTANTS GROUP. ALL RIGHTS RESERVED.

MW-08

FS AREA

MW-06

MW-15

#### PREPARED FOR:

WEST ASH POND\*

MIDWEST GENERATION, LLC

MW-04

EAST ASH POND

WS-GT-5

### APPROXIMATE SAMPLE LOCATION MAP -**WAUKEGAN STATION**

401 E. GREENWOOD AVENUE WAUKEGAN, IL

THIS DOCUMENT, AND THE DESIGNS INCORPORATED HERIN, AS AN INSTRUMENT OF PROFESSIONAL SERVICE, IS THE PROPERTY OF WEAVER CONSULTANTS GROUP, AND IS NOT TO BE USED IN WHOLE OR IN PART, WITHOUT THE WRITTEN AUTHORIZATION OF WEAVER CONSULTANTS GROUP.



APPROXIMATE GRAPHIC SCALE

1 inch = 400 ft.

INTAKE/ DISCHARGE CHANNEL

Weaver Consultants

DATE: FILE: CAD: WaukeganSite.c

CHICAGO, ILLÎNOWWG13-15\_814&1GURE 8

800

DRAWN BY:

REVIEWED BY:

4/16/202

5244-30

**Tables** 

## Table 1 Historical Leaching Data Joliet 29 Station

Parameter	Units	Tier 1 SRO for the Soil Component of the Groundwater Ingestion Exposure Route for Class I Groundwater <sup>a</sup>	KPRG CCB Determination June 8, 2005  Soil Borings - Composite  GP-1/0-8' GP-2/0-11' GP-3/0-8' GP-4/0-4' GP-5/0-4' GP-6/0-7' GP-7/0-2' GP-8/0-13' GP-9/0-18' GP-10/0-9' GP-11/0-17' GP-12/0-7' GP-13/0-3' GP-14/0-9' GP-15/0-6'														
<b>Toxicity Characteristic Leaching</b>	Procedure												•		•		
Arsenic	mg/L	0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Barium	mg/L	2.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	mg/L	0.005	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium	mg/L	0.1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	mg/L	0.0075	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Mercury	mg/L	0.002	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	mg/L	0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	mg/L	0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Neutral Leaching Extraction Test																	
Arsenic	mg/L	0.05	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	<0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Barium	mg/L	2.0	0.11	0.088	0.13	0.042	0.091	0.11	0.16	0.15	0.14	0.11	0.0878	0.12	0.26	0 .15	0.17
Beryllium	mg/L	0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	<0.004	< 0.004	< 0.004	< 0.004
Boron	mg/L	2.0	0.37	1.1	0.66	0.47	0.33	0.73	0.87	1.2	2.2	0.77	1.3	0.86	0.43	1.9	1.2
Cadmium	mg/L	0.005	0.005	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002
Chromium	mg/L	0.1	< 0.01	0.012	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	0.011	0.010	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Cobalt	mg/L	1.0	< 0.005	< 0.005	< 0.005	< 0.005	<0.006	< 0.006	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Copper	mg/L	0.65	< 0.01	< 0.01	< 0.01	<0:01	< 0.01	0.048	0.0158	< 0.01	< 0.01	0.021	< 0.01	0.43	< 0.01	1.6	< 0.01
Iron	mg/L	5.0	< 0.05	< 0.05	< 0.05	< 0.06	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	<0.06	< 0.05	< 0.05	< 0.06	< 0.05	< 0.06
Lead	mg/L	0.0075	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.006	0.016	< 0.005	0.043	< 0.005
Manganese	mg/L	0.15	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	0.036	< 0.01	< 0.01	< 0.01	< 0.01
Mercury	mg/L	0.002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002
Molybdenum	mg/L	0.035	0.017	0.022	0.013	< 0.01	< 0.01	0.011	0.026	0.012	0.088	< 0.01	0.015	0.0188	< 0.01	0.026	< 0.01
Nickel	mg/L	0.1	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Potassium	mg/L		0.96	1.3	1.2	0.52	<6	1.8	3.68	2.4 8	3.3	1.3 8	3.8	1.88	1.28	2.48	1.88
Selenium	mg/L	0.05	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	0.0027	0.0039	0.0046	< 0.002	< 0.002	< 0.002	0.0027	< 0.002	< 0.002
Sodium	mg/L		3.9	6.1	4.4	6.4	3.1	14	36	24	43	5.6	9.2	36	9.1	9.2	7.2
Zinc	mg/L	5	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02	0.068	< 0.02	0.21	< 0.02
General Chemistry																	
рН	S.U.		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

5 Concentration exceeds the Tier 1 SRO

#### Notes:

Italics indicates a non-TACO objective. Objective obtained from the IEPA non-TACO Table revised 10/24/2018.

NA - Not Analyzed

--- Not listed in 35 IAC 742, Appendix B, Table A or IEPA non-TACO Table.

<sup>&</sup>lt;sup>a</sup> Tier 1 SRO obtained from TACO 35 IAC 742, Appendix B, Table A.

<sup>&</sup>quot;<" - Indicates the parameter was not detected above the laboratory reporting limit.

## Table 1 Historical Leaching Data Joliet 29 Station

Parameter	Units	Tier 1 SRO for the Soil Component of the Groundwater Ingestion Exposure Route for Class I Groundwater <sup>a</sup>	KPRG Ash/Slag Removal November 4, 2005											
			_		Test Pit - Composite	nposite Soil Probes - Composite								
			GP14A-25N/0-9'	GP14A-40N/0-9'	GP14A-45N/0-9'	GP14A-25W/0-9'	GP14A-40W/0-9'	GP14A-25S/0-9'	GP14A-40S/0-9'	GP14A-25E/0-9'	GP14A-40E/0-9'	GP14A-Profile/0-9'		
<b>Toxicity Characteristic Leaching</b>	Procedure													
Arsenic	mg/L	0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.1		
Barium	mg/L	2.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	<1		
Cadmium	mg/L	0.005	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.05		
Chromium	mg/L	0.1	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.05		
Lead	mg/L	0.0075	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.05		
Mercury	mg/L	0.002	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.002		
Selenium	mg/L	0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.1		
Silver	mg/L	0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.05		
<b>Neutral Leaching Extraction Test</b>	į													
Arsenic	mg/L	0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Barium	mg/L	2.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Beryllium	mg/L	0.004	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Boron	mg/L	2.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Cadmium	mg/L	0.005	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Chromium	mg/L	0.1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Cobalt	mg/L	1.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Copper	mg/L	0.65	< 0.05	< 0.05	NA	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	NA		
Iron	mg/L	5.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Lead	mg/L	0.0075	< 0.0075	0.018	< 0.0075	0.0072	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	NA		
Manganese	mg/L	0.15	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Mercury	mg/L	0.002	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Molybdenum	mg/L	0.035	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Nickel	mg/L	0.1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Potassium	mg/L		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Selenium	mg/L	0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Sodium	mg/L		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Zinc	mg/L	5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
General Chemistry														
рН	S.U.		NA	NA	NA	NA	NA	NA	NA	NA	NA	7.4		

5 Concentration exceeds the Tier 1 SRO

#### Notes:

<sup>a</sup> Tier 1 SRO obtained from TACO 35 IAC 742, Appendix B, Table A. *Italics* indicates a non-TACO objective. Objective obtained from the IEPA non-TACO Table revised 10

"<" - Indicates the parameter was not detected above the laboratory reporting limit.

--- Not listed in 35 IAC 742, Appendix B, Table A or IEPA non-TACO Table.

### Table 2 **Historical Leaching Data Powerton Station**

Parameter	Units	Tier 1 SRO for the Soil Component of the Groundwater Ingestion Exposure Route for	Andrews Environmental Engineering, Inc. Test Pit Activities May 6, 2004 Test Pit Samples									MWG Bottom Ash Sampling February 27, 2007	January 11, 2018		KPRG Alternate Source Demonstration January 4, 2019				
		Class I Groundwater <sup>a</sup>	TP-03/2.9'	TP-12/3.0'	TP-15/5.4'	SFA-1	TP-16/6.6'	Test Pit TP-19/2.7	TP-23/4.8	TP-27/7.2	TP-29/8.0'	FS-01	FS-02	BA-01	Composite Powerton Bottom Ash	Composite Ash Bypass Basin	Composite Ash Surge Basin	Composite Ash Bypass Basin	Composite Ash Surge Basin
Toxicity Characteristic	ic Leaching Pr	ocedure		•			•										_		
Arsenic	mg/L	0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	NA	NA	NA	NA	NA	NA
Barium	mg/L	2.0	0.18	0.43	0.21	0.22	0.095	1.5	0.17	0.17	0.17	0.16	0.18	NA	NA	NA	NA	NA	NA
Cadmium	mg/L	0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.008	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	NA	NA	NA	NA	NA	NA
Chromium	mg/L	0.1	< 0.05	0.027	0.16	0.13	0.024	< 0.05	< 0.05	0.026	0.053	< 0.05	< 0.05	NA	NA	NA	NA	NA	NA
Lead	mg/L	0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	NA	NA	NA	NA	NA	NA
Mercury	mg/L	0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	NA	NA	NA	NA	NA	NA
Selenium	mg/L	0.05	0.14	0.059	0.19	0.095	0.052	0.016	0.021	0.046	0.077	0.056	0.069	NA	NA	NA	NA	NA	NA
Silver	mg/L	0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	NA	NA	NA	NA	NA	NA
Neutral Leaching Extr	raction Test														_				
Antimony	mg/L	0.006	< 0.006	< 0.006	< 0.006	< 0.006	< 0.006	< 0.006	< 0.006	< 0.006	< 0.006	< 0.006	< 0.006	< 0.006	< 0.006	NA	NA	NA	NA
Arsenic	mg/L	0.05	< 0.05	< 0.05	0.013	< 0.05	< 0.05	0.011	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	NA	NA	NA	NA
Barium	mg/L	2.0	0.22	0.27	0.21	0.15	0.24	0.33	0.37	0.21	0.2	0.28	0.21	0.39	0.27	NA	NA	NA	NA
Beryllium	mg/L	0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	NA	NA	NA	NA
Boron	mg/L	2	1.5	1.1	1.2	1	0.32	0.1	1.4	0.84	0.65	4	3	0.087	< 0.1	NA	NA	NA	NA
Cadmium	mg/L	0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	NA	NA	NA	NA
Chromium	mg/L	0.1	0.027	< 0.05	0.16	0.16	0.032	< 0.05	< 0.05	0.036	0.092	0.015	0.021	< 0.05	< 0.025	NA	NA	NA	NA
Cobalt	mg/L	1.0	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.025	NA	NA	NA	NA
Copper	mg/L	0.65	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.025	NA	NA	NA	NA
Iron	mg/L	5.0	< 0.1	0.15	< 0.1	< 0.1	< 0.1	0.31	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	NA	NA	NA	NA
Lead	mg/L	0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	< 0.0075	NA	NA	NA	NA
Manganese	mg/L	0.15	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.025	NA	NA	NA	NA
Mercury	mg/L	0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	0.0004	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	NA	NA	NA	NA
Nickel	mg/L	0.1	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.025	NA	NA	NA	NA
Selenium	mg/L	0.05	0.08	0.035	0.15	0.099	0.04	< 0.05	< 0.05	0.035	0.04	0.044	0.038	< 0.05	< 0.05	NA	NA	NA	NA
Silver	mg/L	0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.025	NA	NA	NA	NA
Thallium	mg/L	0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	NA	NA	NA	NA
Zinc	mg/L	5	0.07	0.17	0.098	0.037	0.041	0.067	0.053	0.054	0.056	0.053	0.053	0.044	< 0.1	NA	NA	NA	NA
Leaching Environment	ıtal Assessmen	t Framework Analyses b																	
Antimony	mg/L	0.006	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.0011	0.0013
Arsenic	mg/L	0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0048	0.0033
Barium	mg/L	2.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.35	0.15
Bervllium	mg/L	0.004	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.00011	< 0.000057
Boron	mg/L	2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	3.7	0.36	NA	NA
Cadmium	mg/L	0.005	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.00018	< 0.00013
Calcium	mg/L		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	130	35	NA	NA
Chromium	mg/L	0.1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0085	0.002
Chloride	mg/L	200	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	27	6.5	NA	NA
Cobalt	mg/L	1.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0014	< 0.000075
Fluoride	mg/L	4	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.8	0.21	1.4	0.45
Lead	mg/L	0.0075	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0033	< 0.000094
Lithium	mg/L		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0034	0.0097
Mercury	mg/L	0.002	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.000065	< 0.000065
Molybdenum	mg/L	0.035	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0039	0.0029
Selenium	mg/L	0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.00081	< 0.00081
Sulfate	mg/L	400	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	910	87	NA	NA
Thallium	mg/L	0.002	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.000063	< 0.000063
TDS	mg/L	1200	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1500	200	NA	NA
pH	S.U.		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	8.8	8.5	9	8.6
General Chemistry									•				•		•				
	S.U.		11.5	11.8	12.2	11.4	10.4	8.6	10.3	10.7	10.8	8.7	9.9	NA	NA	NIA	NA	NΑ	NA

0.14 Concentration exceeds the Tier 1 SRO

Notes:

a Tier 1 SROs obtained from TACO 35 IAC 742, Appendix B, Table A.
b LEAF results from natural pH analysis shown.

Italics indicates a non-TACO objective. Objective obtained from the IEPA non-TACO Table revised 10/24/2018.
NA - Not Analyzed
"<" - Indicates the parameter was not detected above the laboratory reporting limit.
--- Not listed in 35 IAC 742, Appendix B, Table A or IEPA non-TACO Table.

Historical Leaching Data (All Stations).xlsxJ:\Projects\\$200-5299\\$244\300\07\01\WCG Project Documents\Report Appendices\

Page 1 of 1

# Table 3 Historical Leaching Data Will County Station

Parameter	Units	Tier 1 SRO for the Soil Component of the Groundwater Ingestion Exposure	MWG Bottom Ash Sampling December 2, 2010	June-August 2015								Alterna Demon	PRG te Source astration													
		Route for Class I	Composite					•		•									•	,				,		posite
		Groundwater a	3 South Bottom Ash	A2	A3	A4	A5	B1	B2	В3	B4	B5	B6	B7	C2	C3	C4	C5	C6	C7	D5	D6	<b>D</b> 7	Protocol 1	AP 2S Ash	AP 3S Ash
Toxicity Characteristic								1	1					1	1			1		1	1			1		
Arsenic	mg/L	0.05	<0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.05	NA	NA
Barium	mg/L	2.0	0.96	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.83	NA	NA
Boron	mg/L	2.0	< 0.005	NA	NA	NA	NA	NA	NA NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA <0.005	NA	NA
Cadmium	mg/L	0.005	0.029	NA	NA	NA	NA	NA	NA	NA NA	NA	NA	NA	NA	NA	NA	NA NA	NA	NA	NA	NA	NA	NA	<0.005	NA NA	NA
Chromium	mg/L	0.1 0.65		NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA	NA NA	NA NA	NA	NA NA	NA NA	<0.025 <0.025	NA NA	NA
Copper Lead	mg/L	0.0075	NA <0.0075	NA NA	NA NA	NA NA	NA	NA	NA NA	NA NA	NA	NA	NA NA	NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA	< 0.023	NA NA	NA NA
Nickel	mg/L mg/L	0.0073	VA.0073	NA	NA	NA	NA	NA	NA	NA NA	NA	NA NA	NA NA	NA	NA	NA NA	NA NA	NA	NA NA	NA NA	NA NA	NA	NA NA	<0.03	NA NA	NA NA
Selenium	mg/L	0.05	<0.05	NA	NA	NA	NA	NA	NA NA	NA NA	NA NA	NA	NA	NA	NA NA	NA NA	NA	NA	NA NA	NA NA	NA	NA NA	NA	< 0.023	NA NA	NA NA
Silver	mg/L	0.05	<0.025	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.025	NA	NA
Zinc	mg/L	5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.023	NA NA	NA
Neutral Leaching Extr		, ,	IVA	11/1	11/7	11/7	11/7	11/7	11/71	11/71	11/7	11/7	11/7	11/7	I YA	11/7	11/71	11/7	11/7	I YA	11/7	11/7	11/7	-0.1	IVA	11/2
Antimony	mg/L	0.006	< 0.006	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	NA	NA	NA
Arsenic	mg/L mg/L	0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	NA	NA	NA
Barium	mg/L	2.0	<0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	<0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	NA	NA	NA
Beryllium	mg/L	0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	_	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	< 0.004	_	< 0.004	< 0.004	NA	NA	NA
Boron	mg/L	2.0	1.3	0.2	0.16	0.16	0.16	0.24	< 0.1	< 0.1	< 0.1	< 0.1	0.12	0.16	0.15	< 0.1	0.15	< 0.1	< 0.1	< 0.1	< 0.1	0.12	0.13	NA	NA	NA
Cadmium	mg/L	0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	NA	NA	NA
Chromium	mg/L	0.1	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	NA	NA	NA
Cobalt	mg/L	1.0	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025		< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	NA	NA	NA
Copper	mg/L	0.65	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	NA	NA	NA
Iron	mg/L	5.0	< 0.1	< 0.2	< 0.2	0.3	0.21	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	0.24	0.42	< 0.2	0.22	0.47	< 0.2	NA	NA	NA
Lead	mg/L	0.0075	< 0.0075	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	NA	NA	NA
Manganese	mg/L	0.15	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	NA	NA	NA
Molybdenum	mg/L	0.035	NA	< 0.05	< 0.05	< 0.05	< 0.05		< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	NA	NA	NA
Mercury	mg/L	0.002	< 0.002	< 0.0002	< 0.0002	< 0.0002	2 < 0.0002		< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	NA	NA	NA
Nickel	mg/L	0.1	< 0.025	< 0.025	< 0.025	< 0.025			< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	NA	NA	NA
Potassium	mg/L		NA	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	NA	NA	NA
Selenium	mg/L	0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	NA	NA	NA
Silver	mg/L	0.05	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025		< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025		< 0.025	< 0.025	NA	NA	NA
Sodium	mg/L		NA	14	7.6	6.4	6.4	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	NA	NA	NA
Thallium	mg/L	0.002	< 0.002	<0.25	< 0.25	< 0.25	< 0.25		< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	NA	NA	NA
Zinc	mg/L	5	<0.1	<0.1	<0.1	< 0.1	< 0.1	< 0.1	<0.1	<0.1	<0.1	< 0.1	< 0.1	<0.1	<0.1	<0.1	< 0.1	<0.1	< 0.1	<0.1	<0.1	<0.1	<0.1	NA	NA	NA
Cyanide, Total	mg/L	0.2	<0.01	NA	NA NTA	NA	NA	NA	NA NTA	NA NA	NA NTA	NA	NA	NA	NA NA	NA	NA	NA	NA	NA NTA	NA	NA	NA	NA	NA NA	NA
Chloride	mg/L	200	0.97	NA	NA	NA	NA	NA	NA NTA	NA NTA	NA.	NA.	NA NTA	NA	NA	NA	NA NTA	NA.	NA NTA	NA	NA	NA	NA	NA	NA	NA
Fluoride	mg/L	4 10	0.25 <0.1	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA.	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA	NA NA	NA NA
Nitrate as N Sulfate	mg/L	400	<0.1 49	NA.	NA NA	NA NA	NA NA	NA.	NA.	NA NA	NA NA	NA.	NA.	NA NA	NA NA	NA NA	NA NA	NA.	NA NA	NA NA	NA.	NA NA	NA NA	NA NA	NA NA	NA NA
TDS	mg/L	1200	200	NIA.	NA.	NTA	NA.	NA.	NIA.	NA NA	NTA	N/A	NIA.	NIA.	NA NA	NA NA	NA NA	NIA.	NIA.	NA NA	NIA.	NIA.	NIA.	NA NA	NA NA	NA NA
	mg/L		200	INA	NA	NA	INA	INA	INA	INA	INA	NA	INA	INA	NA	NA	NA	NA	NA	NA	NA	INA	INA	INA	NA	INA
_	-	t Framework Analyses <sup>b</sup>	27.1	27.4	27.4	37.4	27.4	37.1	27.4	27.1	27.1	27.1	27.1	27.1	27.4	27.4	27.1	27.1	27.1	27.4	27.1	27.4	27.1	27.1		
Boron	mg/L	2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4.6	3.3
Calcium	mg/L	200	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	59	95
Chloride	mg/L	200	NA NA	NA NA	NA NA	NA	NA	NA	NA NA	NA NA	NA	NA	NA NA	NA	NA	NA	NA NA	NA NA	NA NA	NA NA	NA	NA	NA	NA	69	15
Fluoride Sulfate	mg/L	4	NA NA		NA	NA	NA NA	NA	NA	. 11. 2	INA NTA	INA.	NA	NA	NA NA	NA	NA	INA.	INA.	1111	NA	NA	NA	NA	<0.1 310	0.31 390
	mg/L	400 1200	NA NA	NA NA	NA NA	NA NA	NA NA	NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	590	
TDS pH	mg/L SU	1200	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA	NA NA	NA	NA NA	NA	NA NA	NA NA	NA NA	8.8	9.3
General Chemistry	30		TVA	TAN	1.47.47	1.//7	1.4/47	TAN	TAN	1.4%	TAN	1.4%	1.1/1/7	1.47-77	1.47.7	TAL	1 4/-7	1 N./-%	1474	1.47.7	1 N I-N	1.1/7	INA	1.47.47	0.0	3.3
pH	S.U.		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	6.99	NA	NA
h11	3.0.		11/1	1477	11/7	11/1	1 1/1	11/1	1.47.77	1.4%	1.47.77	1477	TALF	1477	1.47.77	1 // 7	1 1/7	1477	1417	1.47.77	TALF	1.4%	TALF	0.77	11/2	11/7

4.6

Concentration exceeds the Tier 1 SRO

### Notes:

<sup>a</sup> Tier 1 SROs obtained from TACO 35 IAC 742, Appendix B, Table A.

<sup>b</sup>LEAF results from natural pH analysis shown.

Italics indicates a non-TACO objective. Objective obtained from the IEPA non-TACO Table revised 10/24/2018.

NA - Not Analyzed

"<" - Indicates the parameter was not detected above the laboratory reporting limit.

--- Not listed in 35 IAC 742, Appendix B, Table A or IEPA non-TACO Table.

## Table 4 Historical Leaching Data Waukegan Station

Parameter	Units	Tier 1 SRO for the Soil Component of the Groundwater Ingestion Exposure Route for	MWG Bottom Ash Sampling July 22, 2004			KPRG Alternate Source Demonstration January 17, 2018 Composite		KPRG Bates Soil Investigation November 2020 Soil Probes						
		Class I Groundwater <sup>a</sup>	Composite											
			Bottom Ash-1	Bottom Ash-2	Bottom Ash 1/2	East Pond Ash	West Pond Ash	A1-0-5	A8-5-7	A9-0-5	B10-5-9	C7-0-5	C7-5-10	D5-5-10
Toxicity Characteristic l	Leaching Pro	ocedure	71311-1	71311-2	71311 1/2	71311	71311				l.			
Arsenic	mg/L	0.05	NA	NA	< 0.1	NA	NA	NA	NA	NA	NA	NA	NA	NA
Barium	mg/L	2.0	NA	NA	0.51	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	mg/L	0.005	NA	NA	< 0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium	mg/L	0.1	NA	NA	0.011	NA	NA	NA	NA	NA	NA	NA	NA	NA
Copper	mg/L	0.15	NA	NA	< 0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	mg/L	0.0075	NA	NA	< 0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA
Mercury	mg/L	0.002	NA	NA	< 0.002	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	mg/L	0.05	NA	NA	0.025	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	mg/L	0.05	NA	NA	< 0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	mg/L	5	NA	NA	<0.2	NA	NA	NA	NA	NA	NA	NA	NA	NA
Synthetic Precipitation I			NTA	N.T.A.	NTA	NTA	D.T.A.	NTA	07	NTA	460	D.T.A.	40	150
Sulfate	mg/L	400	NA	NA	NA	NA	NA	NA	97	NA	460	NA	49	150
Neutral Leaching Extra		0.005	0.006		27.			2.7.	27.		37.	27.		3.7.
Antimony	mg/L	0.006	< 0.006	< 0.006	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	mg/L	0.05	< 0.05	< 0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Barium	mg/L	2.0	0.19	0.12	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Beryllium	mg/L	0.004	< 0.004	<0.004	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Boron	mg/L	2	1.1	<0.005	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium Chromium	mg/L	0.005	<0.005 <0.05	<0.005 <0.05	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA
Cobalt	mg/L mg/L	1.0	<0.05	<0.05	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA
	mg/L	0.65	< 0.05	< 0.05	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA	NA NA
Copper Iron	mg/L	5.0	<0.03	<0.03	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	mg/L	0.0075	<0.0075	<0.0075	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Manganese	mg/L	0.15	< 0.05	< 0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Mercury	mg/L	0.002	< 0.002	< 0.002	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nickel	mg/L	0.1	< 0.05	< 0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	mg/L	0.05	< 0.05	< 0.05	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Thallium	mg/L	0.002	< 0.002	< 0.002	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	mg/L	5	< 0.1	< 0.1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Leaching Environmenta	l Assessment	Framework Analyses b		•			•				•			
Arsenic	mg/L	0.05	NA	NA	NA	NA	NA	0.011	NA	0.058	NA	0.022	NA	NA
Boron	mg/L	2	NA	NA	NA	2	1.9	5	NA	8.2	NA	13	NA	NA
Calcium	mg/L		NA	NA	NA	43	42	55	NA	85	NA	150	NA	NA
Chloride	mg/L	200	NA	NA	NA	2.9	17	2.5	NA	1.2	NA	1.2	NA	NA
Fluoride	mg/L	4	NA	NA	NA	0.32	0.53	NA	NA	NA	NA	NA	NA	NA
Iron	mg/L	5	NA	NA	NA	NA	NA	< 0.05	NA	< 0.05	NA	< 0.05	NA	NA
Lithium	mg/L		NA	NA	NA	NA	NA	0.014	NA	0.0048	NA	0.0042	NA	NA
Manganese	mg/L	0.15	NA	NA	NA	NA	NA	0.00093	NA	0.0013	NA	0.00098	NA	NA
Molybdenum	mg/L	0.035	NA	NA	NA	NA	NA	0.094	NA	0.072	NA	0.17	NA	NA
Sulfate	mg/L	400	NA	NA	NA	130	38	93	NA	140	NA	290	NA	NA
Thallium	mg/L	0.002	NA	NA	NA	NA	NA	0.00026	NA	0.00017	NA	< 0.001	NA	NA
TDS	mg/L	1,200	NA	NA	NA	270	240	220	NA	310	NA	580	NA	NA
рН	SU		NA	NA	NA	9.7	9.7	9.4	NA	10.1	NA	9.6	NA	NA
General Chemistry														
pН	S.U.		NA	NA	10.5	NA	NA	9.0	9.1	9.2	7.5	8.5	8.8	7.3

3

Concentration exceeds the Tier 1 SRO

### Notes:

 ${\it Italics} \ \ indicates \ a \ non-TACO \ objective. \ Objective \ obtained \ from \ the \ IEPA \ non-TACO \ Table \ revised \ 10/24/2018.$ 

<sup>&</sup>lt;sup>a</sup> Tier 1 SROs obtained from TACO 35 IAC 742, Appendix B, Table A.

<sup>&</sup>lt;sup>b</sup> LEAF results from natural pH analysis shown.

NA - Not Analyzed

<sup>&</sup>quot;<" - Indicates the parameter was not detected above the laboratory reporting limit.

<sup>---</sup> Not listed in 35 IAC 742, Appendix B, Table A or IEPA non-TACO Table.

# Appendix A Resumes



## Douglas G. Dorgan, Jr., LPG

### Co-President, Principal

#### **EDUCATION**

B.S. Earth Science, Eastern Illinois University, 1986 Graduate Course Work in Environmental Studies, Sangamon State University, 1986

M.S. Geography/Environmental Science, Northern Illinois University, 1993

### **CERTIFICATIONS**

Licensed Professional Geologist: Illinois, Indiana, and Kansas

OSHA Supervisor's Health & Safety Training Chemicalterrorism Vulnerability Information (CVI) Authorized User

### **FIELDS OF EXPERTISE**

Environmental Due Diligence, Environmental Permitting, Brownfield's Redevelopment, Remediation Design and Cost Modeling, Groundwater Impact Assessment, Risk Based Corrective Action, Expert Witness and Litigation Support

### **Professional Summary**

Mr. Dorgan serves as Co-President and Principal of Weaver Consultants Group. He has over thirty-five years of environmental and solid waste control project experience. He has supervised completion of numerous projects including multi-phase environmental site assessments, risk based corrective action, Brownfield's redevelopment, hydrogeological investigations, groundwater impact assessments, remediation planning and implementation, multi media compliance audits, UST closures, and solid waste management facility permitting. He has also served as an Expert Witness.

Prior to joining Weaver Consultants Group, Mr. Dorgan was an Office Director for a national environmental consulting firm.

### Select Project Experience

He has been involved in over 100 state voluntary remediation program projects at sites located across the country. These projects have utilized a range of closure strategies involving site-specific fate and transport modeling, risk assessment, remediation, land use controls, and engineered barriers. Many of these projects were completed in support of property acquisition and consequently completed in accordance with aggressive schedule and risk mitigation requirements.

Mr. Dorgan has provided services to both private and public sector clients redeveloping Brownfield's. Plans have included residential, retail, commercial, industrial, institutional, and mixed use developments. He also consults on the unique construction related aspects of developing distressed properties.

He has been the Principal in Charge for the Environmental Due Diligence associated with acquisition of the 3100 acre former Bethlehem/RG Steel facility in Sparrows Point, Maryland. Since completion of the property acquisition, Mr. Dorgan has been serving as the Project Coordinator on behalf of the owner, Tradepoint Atlantic, LLC. His responsibilities include coordination of environmental obligations being performed pursuant to regulatory agreements executed with both the Maryland Department of Environment and the United States Environmental Protection Agency.

In his role as lead consultant, Mr. Dorgan is supporting due diligence undertaken by a national industrial redevelopment company that specializes in acquisition of distressed assets across the United States. Mr. Dorgan's role includes leading a team of environmental professionals supporting due diligence including completion of Environmental Site Assessments, remedial options evaluation and cost modeling, support to environmental insurance underwriting review, and support in communications with capital partners and investment advisors. Properties include closed steel mills, power plants, petrochemical facilities, shipyards, ports, and oil and gas operations.



### Select Project Experience - Continued

Mr. Dorgan has been the Principal in Charge for environmental investigation and cleanup activities conducted by a Class I Railroad Operator at sites located in five states across the Midwest. Activities have included investigations and risk based cleanups conducted pursuant to various state voluntary cleanup programs.

He managed activities performed in compliance with a RCRA Hazardous Waste Management Permit for a major steel company located in Northwest Indiana. Responsibilities include supervision of preparation of permit renewal and amendment applications, permit negotiations with IDEM and USEPA, and ongoing groundwater sampling and reporting for a hazardous waste landfill network comprised of 64 monitoring points. Mr. Dorgan also managed RCRA Corrective Action activities for the site, including preparation of required plans and deliverables and investigation and corrective measures implementation pursuant to approved workplans.

Mr. Dorgan managed acquisition of a comprehensive "No Further Remediation" letter pursuant to the Illinois Site Remediation Program for a 14-acre parcel located in the northern suburbs of Chicago. A soil and groundwater investigation was performed to assess site impacts. Tier 2 modeling and development of site specific background following the Illinois Tiered Approach to Corrective Action Objectives (TACO) methods were used to support appropriate soil and groundwater remediation objectives. Remediation activities included removal of 45,000 tons of debris and fill material, and excavation and disposal of LUST contaminated soils.

As Principal in Charge, Mr. Dorgan was previously responsible for overseeing design, permitting and compliance activities for a Type II and III Solid Waste Disposal facility in Pines, Indiana. He was also responsible for oversight of ongoing RI/FS activities for the Town of Pines Superfund Site in Pines, Indiana. On behalf of a major PRP, Mr. Dorgan collaborated with other technical consultants on the implementation of the RI/FS and ongoing remedial measures development and construction.

He managed the site investigation and Indiana Voluntary Remediation Program activities for a large glass manufacturing facility in Central Indiana. Site investigation activities resulted in remediation of select facility areas to control for impacts attributable to semi-volatile organic compounds, polychlorinated biphenyl's (PCB's), and inorganic constituents. Additional site measures included removal of contaminated creek sediments and implementation of a comprehensive groundwater investigation.

Mr. Dorgan managed an Illinois SRP application for a former die casting facility with PCB impacts to facility structures, soils, and shallow groundwater. Extensive site investigation was undertaken and TACO Tier 2 and 3 modeling performed. Certain remedial objectives for the project were approved through a Risk Based Disposal Approval Request submitted to USEPA Region 5.

He was Project Manager for a comprehensive Phase I Environmental Site Assessment of the General Motors Danville, IL gray iron foundry whose operations date to the early 1940s. Project required a detailed records review and site inspection to identify potential areas of concern. Subsequent responsibilities included developing a scope of work for site investigation.

Mr. Dorgan managed implementation of a facility-wide investigation for PCB-related impacts at a die casting facility in Chicago, Illinois. The investigation scope included sampling of soil, concrete, structural surfaces, and process equipment. Based on investigation results, alternative risk-based opinions were evaluated for site remediation. In support of on-going litigation, an engineering remediation cost estimate was generated.

Mr. Dorgan managed RCRA Corrective Action activities for a specialty steel manufacturing facility in Niles, Michigan. Activities included operation and monitoring of an Interim Measures groundwater remediation system, implementation of preliminary subsurface investigations, development of RCRA RFI Workplans, and negotiations with Michigan Department of Environmental Quality personnel.

He conducted comprehensive and media-specific environmental compliance audits of facilities located in four states for a major medical diagnostic imaging equipment manufacturer. Comprehensive audits were performed for select waste and scrap material management facilities. Audits included recommendations for corrective measures in addition to development of a division-wide program for management of recoverable waste streams.



### Select Project Experience - Continued

Mr. Dorgan was the Project Manager for a Phase I and II Environmental Site Assessment of a 1.1 million square foot former can manufacturing facility in Chicago. Assessment activities were designed to evaluate long term liabilities and environmental considerations associated with facility reuse and/or demolition planning.

### **Publications and Presentations**

- **"Environmental Audits for Selection of Solid Waste Disposal Sites",** presented at Waubonsee Community College, Sugar Grove, IL, November, 1992
- "Conducting Effective Environmental Site Assessments", presented to the Institute of Business Law Conference 'Environmental Regulation in Illinois', September, 1993
- "Minimizing Liability in Real Estate Transactions by Conducting Effective Environmental Site Assessments", New Mexico Conference on the Environment, Journal of Conference Proceedings, April, 1994
- "General Geologic/Hydrogeologic and Contaminant Transport Principles", presented to ITT/Hartford Insurance Co., January, 1996
- **"Environmental Site Assessments and the Due Diligence Process",** presented to the AIG Environmental seminar 'Legal Actions Against Facilities', March, 1998
- "Brownfields Development, TACO and the SRP Process", presented to the Calumet Area Industrial Commission Executive Council, May, 1998
- **"Property Acquisition and the Due Diligence Process",** presented to Cushman and Wakefield Corporate Services Department, August, 1998
- "Brownfields Development, TACO and the SRP Process", presented to the Calumet Area Industrial Commission, March, 1999
- "Risk Management Tools for Contaminated Site Development", presented to a construction industry seminar 'A View From the Top', February, 2000
- "Voluntary Remediation of Brownfields/Risk Based Remediation", presented to Illinois Association of Realtors, October, 2002
- "Blue Skies for Brownfields", Illinois Association of Realtors Magazine, May, 2003
- **"Environmental Considerations Associated with Site Development",** presented to Power Construction Operations Meeting, March, 2006
- "Weaver Consultants Group Environmental Manager AAI Roundtable", facilitator and presenter, June, 2006
- "Overview of AAI and ASTM E1527-05: The Changing Due Diligence Landscape", presented to Grand Rapids Chamber of Commerce Environmental Committee, January, 2007
- "Weaver Consultants Group Environmental Manager Vapor Intrusion Roundtable", facilitator and presenter, July/November, 2007
- "Brownfields Redevelopment: A Catalyst for Change", presented to Indiana University Northwest, July, 2011





Michael B. Maxwell, LPG **EPG Chicago Operations Manager** 

### **EDUCATION**

M.S. Geology, University of Iowa, 1996

B.A. Geological Science, State University of New York, College at Geneseo, 1994

#### **CERTIFICATIONS**

Licensed Professional Geologist (LPG), Illinois and Indiana

Certified Hazardous Materials Manager (CHMM) OSHA 40 Hour Hazardous Waste Site Worker and OSHA 8 Hour Refresher Course

### **Professional Summary**

Mr. Maxwell serves as the Environmental Practice Group Chicago Operations Manager for Weaver Consultants Group. He has over twenty four years of professional consulting experience in conducting and managing a wide variety of environmental and solid/hazardous waste facility projects. These projects have included detailed environmental studies and closures of solid and hazardous waste disposal facilities, as well as industrial manufacturing operations. He has successfully completed environmental numerous projects including: multi-phase environmental site assessments, risk-based corrective action and closure, UST closures, hazardous and solid waste permitting, and corrective action, routine groundwater monitoring, groundwater assessment reports, and hydrogeological investigations. He has also played the key supporting/management role in preparation of Expert Reports and testimony as an Expert Witness related to various legal cases involving investigations/remediation under CERCLA (Superfund) and various state voluntary cleanup program regulations.

### Select Project Experience

Mr. Maxwell is project director for permitting, design, and compliance activities at an industrial waste (coal ash) disposal facility in northwest Indiana. The facility is regulated under two different permits and is also part of a larger RI/FS investigation conducted within the local municipality under an Agreed Order with USEPA based on the CERCLA regulations. Activities managed corrective detection, assessment, and groundwater/surface water planning/monitoring, and supplemental closure, including wetlands investigations and permitting.

Mr. Maxwell assisted with the preparation of an Expert Witness Report and subsequent deposition testimony associated with CERCLA liability, cost allocation, appropriateness, and costs associated with the selected remedy related to a former zinc smelter located in the Metro East Area in Illinois.

He has also played the key supporting role in the preparation of Expert Opinions and deposition testimony in support of defendants involved in toxic tort and property damage litigation claims related to historic use of chlorinated solvents at an industrial facility in St. Louis, MO. The facility and surrounding residential neighborhood has been extensively investigated over the last 25 plus years under a prior Consent Degree with the State of Missouri and ongoing investigation/remediation under a separate Consent Decree with USEPA, which requires extensive investigation/remediation activities modeled after

Mr. Maxwell has been involved in over 100 state voluntary remediation program projects at sites in the Midwest and Mid-Atlantic. These projects have utilized a range of closure strategies, often involving site-specific fate and transport modeling, risk assessment, remediation, land use controls, and engineered barriers. Many of these projects were completed to support property transactions with aggressive schedules and risk mitigation requirements.



He has provided environmental consulting services related to compliance with the closure and groundwater monitoring requirements under 40 CFR 257 Hazardous and Solid Waste Management System, Disposal of Coal Combustion Residuals From Electric Utilities rules (Federal CCR Regulations). Mr. Maxwell assisted in the design and installation of the initial groundwater monitoring system, including preparation of the Groundwater Sampling and Analysis Plan, oversaw the collection of the initial eight rounds of background data, as well as the statistical evaluation of the groundwater monitoring data. The groundwater monitoring data was intended to support the preparation and regulatory approval of Closure Plans for the facilities. He was also involved in addressing various technical comments provided by the state regulators concerning the Closure Plans for both facilities. Services provided to local Indiana utility and general contractor that prepared the Closure Plans.

Mr. Maxwell managed the review of Groundwater Monitoring Reports prepared under the Federal CCR Regulations for two former Coal Ash Impoundment sites in northern New Jersey. The former surface impoundments were closed by removal as part of the facilities being redeveloped into commercial/industrial mixed use properties. Liability protections were attained for the site owner under the New Jersey Voluntary Cleanup Program.

He prepared a Technical Impracticability (TI) Waiver related to the remedial approach selected in the Record of Decision (ROD) to address a complex chlorinated solvents groundwater plume at a rail yard Superfund site located in northern Indiana. Supporting information for the TI waiver was obtained from a number of other chlorinated solvent groundwater remediation projects in vicinity of the railyard. The TI Waiver was utilized as the basis for the issuance of an Amended ROD by USEPA. The Amended ROD waived the prior requirement to restore the aquifer to drinking water standards throughout the plumes and required various other source control measures, aquifer flushing, groundwater monitoring, and further investigation/remediation within certain parts of the Superfund site.

Mr. Maxwell has managed Phase II ESA activities and developed a Response Action Plan (RAP) compliant with the Maryland Voluntary Cleanup Program for a 48-acre parcel of prime real estate not far from the I-95 corridor that is part of a larger 3,300 acre redevelopment of a former steel mill located in Baltimore, MD. The environmental due diligence and risk management activities are being performed to support attainment of a NFA Letter that will be acceptable to the current landowner, developer, and future lessee.

He has performed site investigation and Indiana Voluntary Remediation Program (VRP) closure activities for a large glass manufacturing facility in Central Indiana. Site Investigation activities resulted in remediation of select facility areas to control for impacts attributable to semi-volatile organic compounds, PCB's and inorganic constituents. Additional site measures included removal of contaminated creek sediments and implementation of a comprehensive groundwater investigation. The Remediation Completion Report was approved by IDEM and a Comprehensive Certificate of Completion has been issued under the Indiana VRP.

Mr. Maxwell supervised a team of over five technical staff involved in the due diligence review of the environmental conditions associated with a portfolio of nearly 300 commercial/industrial properties owned by a Real Estate Investment Trust in support of a proposed asset transfer totaling approximately \$3.4 billion. The results of the due diligence review were presented in a master spreadsheet that highlighted key environmental issues associated with each property. The review was completed within a compressed timeline of 3 weeks in order to meet the client specified closing schedule.

He was project manager for a LUST remediation project for a 2 acre parcel in the west suburbs of Chicago formerly containing a gasoline station and various other commercial buildings. Remedial and site development activities completed at the site included the demolition of the previous gas station and other commercial buildings, UST removal, along with the excavation and disposal of greater than 2,000 tons of petroleum impacted soils. The costs incurred for the remedial activities were eligible for reimbursement under the Illinois LUST Fund and over \$200,000 were approved for payment from the LUST Fund. The remediation activities allowed for the timely redevelopment of the property as a drug store for a nationwide chain.

Mr. Maxwell has managed remedial and report writing activities for the remediation and redevelopment of a high profile 7.5 acre Brownfield redevelopment property on Goose Island within the City of Chicago. The undeveloped site was entered into the Illinois SRP for purposes of securing a Comprehensive NFR Letter. A Draft NFR Letter was attained in a timely manner, allowing for the closing of the real estate transaction. Implementation of risk-based remediation strategies, including soil management zone, engineered barriers, and institutional controls instead of active remediation saved the property owner millions of dollars. The final NFR Letter from the state agency has been issued.



He has prepared two petitions to delist multi-source leachates that were considered listed hazardous wastes under RCRA. The documents include a risk assessment of the petitioned waste using the Delisting Risk Assessment Software (DRAS) developed by USEPA. Also, Mr. Maxwell provided testimony relating to the technical content of the Delisting Petition at a hearing before the Illinois Pollution Control Board. One Delisting Petition has been approved by the Illinois Pollution Control Board and the other is under review by USEPA Region VII.

Mr. Maxwell has supervised technical support staff involved in hydrogeologic site investigations designed to comply with detailed solid and hazardous waste permitting requirements in Indiana. The specific activities included the field drilling program, data evaluation, and preparation of the hydrogeologic site investigation for inclusion in the permit applications. The reports were subsequently approved by the state agency and assisted the client in attaining expansion and/or renewal permits.

He has both performed and supervised numerous projects relating to permitting and regulatory compliance at a Hazardous Waste Disposal Facility in northwest Indiana. Tasks completed included: RCRA permit compliance, RCRA permit modifications, permit renewals, preparation of assessment monitoring reports and preparation of Alternate Source Demonstration Reports. The Alternate Source Demonstration Reports documented that the hazardous waste landfill was not the cause of statistically significant concentrations of barium and cyanide in groundwater. The reports were subsequently approved by state regulators, which avoided implementation of costly compliance groundwater monitoring at the facility.

Mr. Maxwell has prepared various report documents supporting RCRA Corrective Action activities at two steel finishing facility properties located in Portage, IN. The RCRA Facility Investigation (RFI) Workplan detailed proposed investigation and corrective action activities at numerous solid waste management units (SWMUs) identified on the property containing the active steel finishing mill, as well as the property that formerly contained various waste disposal lagoons associated with the mill.

The reports prepared by Mr. Maxwell have resulted in the regulatory closure under RCRA in the form of the attainment of No Further Action (NFA) Letters for two individual SWMUs and three interim status RCRA Units located on the property that formerly contained various waste disposal lagoons. The closure of these SWMUs allowed for 50 acres of land along Lake Michigan to ultimately become part of the Indiana Dunes National Lakeshore.

The various reports and evaluations prepared by Mr. Maxwell have resulted in the regulatory closure under RCRA in the form of the issuance of NFA Letters for 12 SWMUs located on property containing an active steel finishing mill. The technical evaluation which demonstrates that site conditions were eligible for closure included application of Indiana's Risk-Integrated System of Closure (RISC), as well as the more recently implemented Indiana Remediation Closure Guidance.

He is responsible for all aspects of groundwater monitoring projects at over two dozen solid and hazardous waste disposal facilities, including: groundwater sampling, interpretation of analytical results, statistical evaluation, and report writing.

Mr. Maxwell is presently managing implementation of a comprehensive groundwater monitoring and free product recovery program at various RCRA land disposal units located at a 4,000 acre steelmaking/finishing facility in northwest Indiana. Quarterly groundwater monitoring is being performed at over 100 monitoring points by a team of environmental professionals. Closure has also been approved under the Indiana State Cleanup Program for a historical LUST Incident on an adjacent railyard.

He has prepared an Alternate Concentration Limit (ACL) Demonstration for a closed RCRA Solid Waste Disposal facility in southern Indiana. The ACLs were shown to be protective of human health and the environment using various risk-based methodologies, including: Risk-Based Corrective Action (RBCA), and the state of Indiana Risk Integrated System of Closure. The ACL Demonstration was subsequently approved by IDEM.

### Publications/Presentations

"Synthetic Soils From Industrial and Municipal Wastes, For the Reclamation of Strip Mines in Southern Iowa", presented at the Geological Society of America North-Central Meeting, Ames, IA, May 1996.

"Side-by-Side Comparison of Two Groundwater Sampling Methodologies: A Quantitative Review of Analytical Data from Groundwater Samples Collected Simultaneously Using Micropurge 'Low-Flow' and Traditional Standard Groundwater Sampling Techniques", presented at the National Groundwater Association National Conference, Denver, CO, April 2010.



### References

Name: Mr. John Olashuk, Landfill Operator/Solid Waste Engineer - ArcelorMittal Burns Harbor

Address: 4100 Edison Lakes Parkway, Mishawaka, IN 46545

Phone Number: (574) 855-1522

Name: **Mr. Kevin Stetter,** Manager, Corrective Action - United States Steel Corporation Address: Penn Liberty Plaza 1, 1350 Penn Ave – Suite 200, Pittsburgh, PA 1522-4211

Phone Number: (412) 433-4070

Name: Mr. Jim Hitzeroth, Environmental Manager, Republic Services

Address: 26W580 Schick Rd., Hanover Park, IL 60133

Phone Number: (224) 970-1129

# Appendix B List of References

### **REFERENCES**

- American Society for Testing Materials (ASTM) Standard Test Method for Shake Extraction of Solid Waste with Water (ASTM D3987-85).
- CCR Rule Compliance Data and Information. (2021, April). Retrieved from https://www.nrg.com/legal/coal-combustion-residuals.html
- Civil & Environmental Consultants, Inc. (2016, January 18). *Annual Inspection Report Ash Surge Basin and Ash Bypass Basin, Powerton Station*.
- Civil & Environmental Consultants, Inc. (2016, January). *Annual Inspection Report West and East Ash Basins, Waukegan Station.*
- Civil & Environmental Consultants, Inc. (2017, July). *Annual Inspection Report Powerton Station* Former Ash Basin.
- Civil & Environmental Consultants, Inc. (2017, October). *Annual Inspection Report West and East Ash Basins, Waukegan Station.*
- Civil & Environmental Consultants, Inc. (2018, July). *Annual Inspection Report Powerton Station* Former Ash Basin.
- Civil & Environmental Consultants, Inc. (2018, October). *Annual Inspection Report Ash Surge Basin and Ash Bypass Basin, Powerton Station.*
- Civil & Environmental Consultants, Inc. (2018, October). *Annual Inspection Report East Ash Pond and West Ash Pond, Waukegan Station.*
- Civil & Environmental Consultants, Inc. (2019, July). *Annual Inspection Report Powerton Station* Former Ash Basin.
- Civil & Environmental Consultants, Inc. (2019, October). *Annual Inspection Report Ash Surge Basin and Ash Bypass Basin, Powerton Station*.
- Civil & Environmental Consultants, Inc. (2019, October). *Annual Inspection Report East Ash Pond and West Ash Pond, Waukegan Station*.
- Civil & Environmental Consultants, Inc. (2020, July). *Annual Inspection Report Powerton Station* Former Ash Basin.
- Civil & Environmental Consultants, Inc. (2020, October). *Annual Inspection Report Ash Pond 2, Joliet Station.*

- Civil & Environmental Consultants, Inc. (2020, October). *Annual Inspection Report Ash Surge Basin and Ash Bypass Basin, Powerton Station*.
- Civil & Environmental Consultants, Inc. (2020, October). *Annual Inspection Report East Ash Pond and West Ash Pond, Waukegan Station*.
- Code of Federal Regulations (CFR), Title 40. Protection of Environment, Chapter I.

  Environmental Protection Agency, Subchapter I. Solid Wastes, Part 257. Criteria for Classification of Solid Waste Disposal Facilities and Practices.
- Code of Federal Regulations (CFR), Title 40. Protection of Environment, Chapter I. Environmental Protection Agency, Subchapter I. Solid Wastes, Part 258. Criteria for Municipal Solid Waste Landfills.
- Code of Federal Regulations (CFR), Title 40. Protection of Environment, Chapter I. Environmental Protection Agency, Subchapter I. Solid Wastes, Part 261. Identification and Listing of Hazardous Waste.
- ENSR Consulting. (1998, October). Phase I Environmental Site Assessment of Commonwealth Edison Joliet #29 Generating Station 1800 Channahon Road, Joliet, Illinois.
- ENSR Consulting. (1998, October). Phase I Environmental Site Assessment of the ComEd Powerton Generating Station, Pekin, Illinois.
- ENSR Consulting. (1998, October). Phase I Environmental Site Assessment of Commonwealth Edison Waukegan Generating Station, 10 Greenwood Avenue, Waukegan, Illinois.
- ENSR Consulting. (1998, October). Phase I Environmental Site Assessment of Commonwealth Edison Will County Generating Station, 529 E. Romeo Road, Romeoville, Illinois.
- ENSR Consulting. (1998, December). *Phase II Environmental Site Assessment of Commonwealth Edison Joliet #29 Generating Station 1800 Channahon Road, Joliet, Illinois.*
- ENSR Consulting. MWG Exhibit 19D. (1998, December). Phase II Environmental Site Assessment of Commonwealth Edison Powerton Generating Station Route 29 & Mantino Road, Pekin, Illinois.
- ENSR Consulting. (1998, November). Phase II Environmental Site Assessment of Commonwealth Edison Waukegan Generating Station, 10 Greenwood Avenue, Waukegan, Illinois.
- ENSR Consulting. (1998, December). Phase II Environmental Site Assessment of Commonwealth Edison Will County Generating Station, 529 East Romeo Road, Romeoville, Illinois.

- Geosyntec Consultants. (2016, October). *Closure Plan Ash Surge Basin and Bypass Basin, Powerton Station*.
- Geosyntec Consultants. (2016, October). *Closure Plan South Ash Ponds 2S and 3S, Will County Station*.
- Geosyntec Consultants. (2016, October). Closure East and West Ash Basins, Waukegan Station.
- Geosyntec Consultants. (2016, October). *History of Construction Ash Surge Basin and Bypass Basin, Powerton Station.*
- Geosyntec Consultants. (2016, October). History of Construction East and West Ash Basins, Waukegan Station.
- Geosyntec Consultants. (2018, April). *History of Construction Former Ash Basin, Powerton Station*.
- Geosyntec Consultants. (2018, October). Placement Above the Uppermost Aquifer Location Restrictions, Ash Surge Basin and Bypass Basin, Powerton Station.
- Geosyntec Consultants. (2018, October). Placement Above the Uppermost Aquifer Location Restrictions, East and West Ash Basins, Waukegan Station.
- Geosyntec Consultants. (2018, October). Placement Above the Uppermost Aquifer Location Restrictions, South Ash Ponds 2S and 3S, Will County Station.
- Geosyntec Consultants. (2020, April). *Placement Above the Uppermost Aquifer Location Restrictions, Former Ash Basin, Powerton Station.*
- https://www.mdpi.com/2076-3263/6/2/29/htm: Geochemical Characterization of Trace MVT Mineralization in Paleozoic Sedimentary Rocks...Geosciences, 2016.
- 35 Illinois Administrative Code Part 845. Draft.
- Illinois Pollution Control Board. PCB No. 2013-2015. (2017, October 24). *Transcript of October 24, 2017 Hearing*.
- Illinois Pollution Control Board. PCB No. 2013-2015. (2017, October 25). *Transcript of October 25, 2017 Hearing*.
- Illinois Pollution Control Board. PCB No. 2013-2015. (2017, October 26). *Afternoon Transcript of October 26, 2017 Hearing*.
- Illinois Pollution Control Board. PCB No. 2013-2015. (2017, October 26). *Morning Transcript of October 26, 2017 Hearing*.

- Illinois Pollution Control Board. PCB No. 2013-2015. (2017, October 27). *Transcript of October 27, 2017 Hearing*.
- Illinois Pollution Control Board. PCB No. 2013-2015. (2018, February). *Transcript of January 29, 2018 Hearing*.
- Illinois Pollution Control Board. PCB No. 2013-2015. (2018, February). *Transcript of January 30, 2018 Hearing*.
- Illinois Pollution Control Board. PCB No. 2013-2015. (2018, January 31). *Transcript of January 31, 2018 Hearing*.
- Illinois Pollution Control Board. PCB No. 2013-2015. (2018, February 1). *Transcript of February* 1, 2018 Hearing.
- Illinois Pollution Control Board. PCB No. 2013-2015. (2018, February 2). *Transcript of February 2, 2018 Hearing*.
- Illinois Pollution Control Board. PCB No. 2013-2015. (2018, July). *Citizens Groups Opening Post-Hearing Brief*.
- Illinois Pollution Control Board. PCB 2013-2015. (2018, July). Respondent Midwest Generation, LLC's Post-Hearing Brief Including Appendix A. Respondent Midwest Generation, LLC's Statement of Facts.
- Illinois Pollution Control Board. PCB 13-15. (2019, June). *Interim Opinion and Order of the Board*.
- Illinois Pollution Control Board. PCB 13-15. (2020, February). Order of the Board.
- Illinois Pollution Control Board. R20-19. (2021, February). In the Matter of: Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments: Proposed new 35 Ill. Adm. Code 845.
- Illinois Public Act 101-171. (2019, July).
- KPRG and Associates, Inc. (2005, December 6). Coal Ash and Slag Removal Summary.
- KPRG and Associates, Inc. (2005, August 18). CCB Determination Summary Report, Joliet, Illinois.
- KPRG and Associates, Inc. (2009, September 26). *Joliet #29 Former Ash Burial Area Runoff Erosion Repair Documentation*.
- KPRG and Associates, Inc. (2010, September 16). *Joliet #29 Former Ash Burial Area Erosion Repair Documentation 2010.*

- KPRG and Associates, Inc. (2011, September 22). *Joliet #29 Former Ash Burial Area Erosion Repair Documentation 2011*.
- KPRG and Associates, Inc. (2013, August 21). *Joliet #29 Former Ash Burial Area Runoff Inspection* 2013.
- KPRG and Associates, Inc. (2014, August 28). *Joliet #29 Former Ash Burial Area Runoff Inspection* 2014.
- KPRG and Associates, Inc. (2015, September 8). CCB Determination Summary Report, Midwest Generation Will County Station.
- KPRG and Associates, Inc. (2018, January 24). *CCR Compliance Annual Groundwater Monitoring and Corrective Action Report 2017, Powerton Station.*
- KPRG and Associates, Inc. (2018, April 12). Alternate Source Demonstration CCR Groundwater Monitoring Powerton Generating Station.
- KPRG and Associates, Inc. (2018, April 12). Alternate Source Demonstration CCR Groundwater Monitoring Waukegan Generating Station.
- KPRG and Associates, Inc. (2019, January 31). CCR Compliance Annual Groundwater Monitoring and Corrective Action Report 2018, Ash By-Pass Basin and Ash Surge Basin.
- KPRG and Associates, Inc. (2019, January 31). *CCR Compliance Annual Groundwater Monitoring and Corrective Action Report 2018, Waukegan Station.*
- MWG13-15\_79341-79442. KPRG and Associates, Inc. (2020, November 11). Joliet Station #29 November 2020 Boring Logs and Analytical Reports.
- MWG13-15\_79493-7971. KPRG and Associates, Inc. (2020, November 25). Waukegan Station November 2020 Boring Logs and Analytical Reports.
- KPRG and Associates, Inc. (2021, January 31). *CCR Compliance Annual Groundwater Monitoring and Corrective Action Report 2020, Joliet #29 Generating Station.*
- KPRG and Associates, Inc. (2021, January 31). *CCR Compliance Annual Groundwater Monitoring* and Corrective Action Report 2020 Ash By-Pass Basin and Ash Surge Basin, Powerton Station.
- KPRG and Associates, Inc. (2021, January 31). *CCR Compliance Annual Groundwater Monitoring and Corrective Action Report 2020 Former Ash Basin, Powerton Station.*
- KPRG and Associates, Inc. (2021, January). *CCR Compliance Annual Groundwater Monitoring and Corrective Action Report 2020, Will County.*

- KPRG and Associates, Inc. (2021, January). CCR Compliance Annual Groundwater Monitoring and Corrective Action Report 2020, Waukegan Station.
- Midwest Generation, LLC (2017, October). Joint Agreed Stipulations.
- MWG Exhibit 254. (2013, January 18). CCA GMZ Application Powerton.
- MWG Exhibit 500. Schwartz, Rebecca. (2005). *Pond characterizations for Midwest Generation Stations: Joliet 29 and 9, Powerton, Waukegan, Will County.*
- MWG Exhibit 621, MWG Letter to Illinois EPA dated July 15, 2009.
- MWG Exhibit 623. (2012, September 4). Supplemental Response to Violation Notice No.: W-2012-00056, Waukegan Generating Station.
- MWG Exhibit 642. (2015, March). Waukegan NPDES Permit No. IL0002259.
- MWG Exhibit 644. MWG13-15\_46627 -46630. Metcalf & Eddy, Inc. (1995, November 30). *Phase II Remedial Investigation Report Former Griess-Pfleger Tannery Site, Waukegan, Illinois.*
- MWG Exhibit 655. (2014, May). Will County NPDES Permit No. IL0002208.
- MWG Exhibit 656. MWG13-15\_559-563. (2012, October) Will County Compliance Commitment Agreement.
- MWG Exhibit 667. MWG Station Maps: Joliet 29, Powerton, Waukegan, Will County.
- MWG Exhibit 710. Natural Resource Technology. (2014, July). *Construction Documentation Transmittal, Secondary Ash Settling Basin Liner Replacement.*
- MWG Exhibit 901. John Seymour Testimony/PowerPoint Presentation and Updates.
- MWG13-15\_48645-48646. (2008, May). NRT. "Field Note Summary Impoundment #2 Liner Replacement.
- MWG\_48742 (2013-2015). Table 3. East Yard Run-off Basin Analytical Results Midwest Generation LLC, Powerton Station, Pekin, IL.
- MWG13-15\_79325-79340. (2020, November 19). Evaluation of Sediment Quantities in Joliet Generating Station's Pond 1 and Pond 3 and Powerton Generating Station's Service Water Basin, prepared by KPRG.
- NRG. (2016, October). Closure Plan Ash Pond 2 Joliet #29 Station.
- NRG. (2019, May). Closure Plan for the Former Ash Basin at the Powerton Station, April 2018 as amended in May 2019.

- NRG. (2020, December 10). *Annual CCR Fugitive Dust Control Report, Joliet #29 Generating Station.*
- Patrick Engineering Inc. (2011, February). *Hydrogeologic Assessment Report, Joliet Generating Station No. 29, Joliet, Illinois.*
- Patrick Engineering Inc. (2011, February). *Hydrogeologic Assessment Report, Powerton Generating Station, Pekin, Illinois.*
- Patrick Engineering Inc. (2011, February). *Hydrogeologic Assessment Report, Waukegan Generating Station, Waukegan, Illinois.*
- Patrick Engineering Inc. (2011, February). *Hydrogeologic Assessment Report, Will County Generating Station, Romeoville, Illinois.*
- Quarles, Mark A. (2021, January). Expert Opinion of Mark A. Quarles, P.G.
- Sargent & Lundy. (2020, November 30). *Demonstration for a Site-Specific Alternative Deadline to Initiate Closure, Powerton Generating Station.*
- Sargent & Lundy. (2020, November 30). *Demonstration for a Site-Specific Alternative Deadline to Initiate Closure, Waukegan Generating Station*.
- Sargent & Lundy. (2020, November 30). *Demonstration for a Site-Specific Alternative Deadline to Initiate Closure, Will County Generating Station.*
- Seymour, John. (2015, July). MWG Exhibit 903. Expert Report of John Seymour, P.E.
- Shealey, Sharene, MWG Director, Environment. Verbal communication with WCG on April 19, 2021.

# Appendix C Statistical Evaluation of Groundwater Data

### Downgradient Groundwater Statistical Analysis Mann-Kendall Trend Tests Joliet 29 Station

Constituent	Well	Trend	Statistically Significant Trend? (99% Confidence Level)	Has well with stat. sig upward trend ever exceeded a GW standard?
Antimony, Dissolved	MW-01	none		
Antimony, Dissolved	MW-02	none		
Antimony, Dissolved	MW-03	none		
Antimony, Dissolved	MW-04	none		
Antimony, Dissolved	MW-06	none		
Antimony, Dissolved	MW-07	none		
Antimony, Total	MW-03	none		
Antimony, Total	MW-04	none		
Arsenic, Dissolved	MW-01	none		
Arsenic, Dissolved	MW-02	none		
Arsenic, Dissolved	MW-03	Down ↓	No	
Arsenic, Dissolved	MW-04	none		
Arsenic, Dissolved	MW-06	Down ↓	No	
Arsenic, Dissolved	MW-07	none		
Arsenic, Total	MW-03	Up↑	No	
Arsenic, Total	MW-04	none		
Barium, Dissolved	MW-01	Down ↓	No	
Barium, Dissolved	MW-02	Down ↓	Yes	
Barium, Dissolved	MW-03	Up↑	No	
Barium, Dissolved	MW-04	Up ↑	Yes	No
Barium, Dissolved	MW-06	Up↑	No	
Barium, Dissolved	MW-07	none		
Barium, Total	MW-03	Down ↓	No	
Barium, Total	MW-04	Down↓	No	
Beryllium, Dissolved	MW-01	none		
Beryllium, Dissolved	MW-02	none		
Beryllium, Dissolved	MW-03	none		
Beryllium, Dissolved	MW-04	none		
Beryllium, Dissolved	MW-06	none		
Beryllium, Dissolved	MW-07	none		
Beryllium, Total	MW-03	none		
Beryllium, Total	MW-04	none		
Boron, Dissolved	MW-01	Down ↓	No	
Boron, Dissolved	MW-02	Down ↓	Yes	
Boron, Dissolved	MW-03	Up↑	No	
Boron, Dissolved	MW-04	Down ↓	No	
Boron, Dissolved	MW-06	Down↓	Yes	
Boron, Dissolved	MW-07	Down ↓	No	
Boron, Total	MW-03	Down↓	No	
Boron, Total	MW-04	none		
Cadmium, Dissolved	MW-01	none		
Cadmium, Dissolved	MW-02	none		
Cadmium, Dissolved	MW-03	none		
Cadmium, Dissolved	MW-04	none		
Cadmium, Dissolved	MW-06	none		
Cadmium, Dissolved	MW-07	none		
Cadmium, Total	MW-03	none		
Cadmium, Total	MW-04	none		
Calcium, Total	MW-03	none		

### Downgradient Groundwater Statistical Analysis Mann-Kendall Trend Tests Joliet 29 Station

Constituent	Well	Trend	Statistically Significant Trend? (99% Confidence Level)	Has well with stat. sig upward trend ever exceeded a GW standard?
Calcium, Total	MW-04	Up↑	No	
Chloride	MW-01	Down↓	No	
Chloride	MW-02	none		
Chloride	MW-03	Down ↓	Yes	
Chloride	MW-04	Down ↓	No	
Chloride	MW-06	none		
Chloride	MW-07	Down ↓	No	
Chromium, Dissolved	MW-01	none		
Chromium, Dissolved	MW-02	none		
Chromium, Dissolved	MW-03	none		
Chromium, Dissolved	MW-04	none		
Chromium, Dissolved	MW-06	none		
Chromium, Dissolved	MW-07	none		
Chromium, Total	MW-03	none		
Chromium, Total	MW-04	none		
Cobalt, Dissolved	MW-01	none		
Cobalt, Dissolved	MW-02	none		
Cobalt, Dissolved	MW-03	none		
Cobalt, Dissolved	MW-04	Up↑	No	
Cobalt, Dissolved	MW-06	none		
Cobalt, Dissolved	MW-07	none		
Cobalt, Total	MW-03	none		
Cobalt, Total	MW-04	none		
Fluoride	MW-01	Down ↓	No	
Fluoride	MW-02	Down ↓	Yes	
Fluoride	MW-03	none		
Fluoride	MW-04	none		
Fluoride	MW-06	Down ↓	Yes	
Fluoride	MW-07	Down ↓	Yes	
Lead, Dissolved	MW-01	none		
Lead, Dissolved	MW-02	none		
Lead, Dissolved	MW-03	none		
Lead, Dissolved	MW-04	none		
Lead, Dissolved	MW-06	none		
Lead, Dissolved	MW-07	none		
Lead, Total	MW-03	none		
Lead, Total	MW-04	none		
Lithium, Total	MW-03	none		
Lithium, Total	MW-04	Up↑	No	
Mercury, Dissolved	MW-01	none		
Mercury, Dissolved	MW-02	none		
Mercury, Dissolved	MW-03	none		
Mercury, Dissolved	MW-04	none		
Mercury, Dissolved	MW-06	none		
Mercury, Dissolved	MW-07	none		
Mercury, Total	MW-03	none		
Mercury, Total	MW-04	none		
Molybdenum, Total	MW-03	Up↑	No	
Molybdenum, Total	MW-04	Up↑	No	

### Downgradient Groundwater Statistical Analysis Mann-Kendall Trend Tests Joliet 29 Station

Constituent	Well	Trend	Statistically Significant Trend? (99% Confidence Level)	Has well with stat. sig upward trend ever exceeded a GW standard?
pH, Field	MW-03	Down ↓	No	
pH, Field	MW-04	Down ↓	No	
pH, Field	MW-06	Down ↓	No	
pH, Field	MW-07	Down ↓	Yes	
Radium 226 + 228, Comb	MW-03	none		
Radium 226 + 228, Comb	MW-04	none		
Selenium, Dissolved	MW-01	Up↑	No	
Selenium, Dissolved	MW-02	none		
Selenium, Dissolved	MW-03	none		
Selenium, Dissolved	MW-04	none		
Selenium, Dissolved	MW-06	Down↓	No	
Selenium, Dissolved	MW-07	none		
Selenium, Total	MW-03	none		
Selenium, Total	MW-04	none		
Sulfate	MW-01	Down↓	No	
Sulfate	MW-02	Down↓	No	
Sulfate	MW-03	Down↓	Yes	
Sulfate	MW-04	Down↓	No	
Sulfate	MW-06	Down↓	No	
Sulfate	MW-07	Down↓	No	
Thallium, Dissolved	MW-01	none		
Thallium, Dissolved	MW-02	none		
Thallium, Dissolved	MW-03	none		
Thallium, Dissolved	MW-04	none		
Thallium, Dissolved	MW-06	none		
Thallium, Dissolved	MW-07	none		
Thallium, Total	MW-03	none		
Thallium, Total	MW-04	none		
Total Dissolved Solids	MW-01	Up ↑	No	
Total Dissolved Solids	MW-02	Up ↑	No	
Total Dissolved Solids	MW-03	Down ↓	Yes	
Total Dissolved Solids	MW-04	Down ↓	Yes	
Total Dissolved Solids	MW-06	none		
Total Dissolved Solids	MW-07	Down ↓	No	

Joliet Stats Summary:

26% Downward trends (11 significant)
13 10% Upward trends (1 significant)
64% No trend

### 132 Total Tests Performed

47 Total Tests where a trend is present

72% of tests where a trend is present are downward

28% of tests where a trend is present are upward

## Downgradient Groundwater Statistical Analysis Mann-Kendall Trend Tests Powerton Station

	•			
Constituent	Well	Trend	Statistically Significant Trend? (99% Confidence Level)	Has well with stat. sig upward trend ever exceeded a GW standard?
Antimony, Dissolved	MW-03	none		
Antimony, Dissolved	MW-04	none		
Antimony, Dissolved	MW-05	none		
Antimony, Dissolved Antimony, Dissolved	MW-06 MW-07	none		
Antimony, Dissolved	MW-07	none		
Antimony, Dissolved	MW-13	none		
Antimony, Dissolved	MW-14	none		
Antimony, Dissolved	MW-15	none		
Antimony, Total	MW-03	none		
Antimony, Total Antimony, Total	MW-04 MW-05	none		
Antimony, Total	MW-08	none		
Antimony, Total	MW-15	none		
Arsenic, Dissolved	MW-03	none		
Arsenic, Dissolved	MW-04	none		
Arsenic, Dissolved Arsenic, Dissolved	MW-05 MW-06	none Down ↓	Yes	
Arsenic, Dissolved	MW-07	Down 1	No	
Arsenic, Dissolved	MW-08	Down↓	Yes	
Arsenic, Dissolved	MW-13	Down ↓	No	
Arsenic, Dissolved	MW-14	Down ↓	Yes	
Arsenic, Dissolved	MW-15 MW-03	Down ↓	Yes	
Arsenic, Total Arsenic, Total	MW-03 MW-04	none		
Arsenic, Total	MW-05	none		
Arsenic, Total	MW-08	Down ↓	No	
Arsenic, Total	MW-15	Down↓	No	
Barium, Dissolved	MW-03	none		
Barium, Dissolved	MW-04	Down ↓	Yes	
Barium, Dissolved Barium, Dissolved	MW-05 MW-06	Down ↓ Down ↓	No Yes	
Barium, Dissolved	MW-07	Down ↓	No	
Barium, Dissolved	MW-08	Down↓	Yes	
Barium, Dissolved	MW-13	none		
Barium, Dissolved	MW-14	Up↑	No	
Barium, Dissolved	MW-15	Down ↓	No	
Barium, Total Barium, Total	MW-03 MW-04	none Down ↓	No	
Barium, Total	MW-05	Down ↓	No	
Barium, Total	MW-08	Down↓	No	
Barium, Total	MW-15	Down ↓	No	
Beryllium, Dissolved	MW-03	none		
Beryllium, Dissolved Beryllium, Dissolved	MW-04 MW-05	none		
Beryllium, Dissolved	MW-06	none		
Beryllium, Dissolved	MW-07	none		
Beryllium, Dissolved	MW-08	none		
Beryllium, Dissolved	MW-13	none		
Beryllium, Dissolved	MW-14	none		
Beryllium, Dissolved	MW-15	none		
Beryllium, Total	MW-03 MW-04	none		
Beryllium, Total	MW-05	none		
Beryllium, Total	MW-08	none		
Beryllium, Total	MW-15	none		
Boron, Dissolved	MW-03	Down ↓	No	
Boron, Dissolved Boron, Dissolved	MW-04 MW-05	Down↓ Down↓	Yes Yes	
Boron, Dissolved	MW-05 MW-06	Down ↓ Down ↓	Yes	
Boron, Dissolved	MW-07	none		
Boron, Dissolved	MW-08	none		
Boron, Dissolved	MW-13	Down ↓	No	
Boron, Dissolved	MW-14	none	NT.	
Boron, Dissolved Boron, Total	MW-15 MW-03	Up ↑ Down ↓	No No	
Boron, Total	MW-04	Down ↓	No	
Boron, Total	MW-05	Down↓	Yes	
Boron, Total	MW-08	Down ↓	Yes	
Boron, Total	MW-15	Down ↓	No	
Cadmium, Dissolved Cadmium, Dissolved	MW-03 MW-04	none		
Cadmium, Dissolved Cadmium, Dissolved	MW-04 MW-05	none		
Cadmium, Dissolved	MW-06	none		
Cadmium, Dissolved	MW-07	none		
Cadmium, Dissolved	MW-08	none		
Cadmium, Dissolved	MW-13	none		
Cadmium, Dissolved Cadmium, Dissolved	MW-14 MW-15	none		
Cadmium, Total	MW-15 MW-03	none	+	
Cadmium, Total	MW-04	none		
Cadmium, Total	MW-05	none		
Cadmium, Total	MW-08	none		

## Downgradient Groundwater Statistical Analysis Mann-Kendall Trend Tests Powerton Station

Constituent	Well	Trend	Statistically Significant Trend? (99% Confidence Level)	Has well with stat. sig upward trend ever exceeded a GW standard?
Cadmium, Total	MW-15	none		
Calcium, Total	MW-03	none		
Calcium, Total Calcium, Total	MW-04 MW-05	Down ↓	No	
Calcium, Total	MW-03 MW-08	none Down↓	Yes	
Calcium, Total	MW-15	Down↓	No	
Chloride	MW-03	Down↓	No	
Chloride Chloride	MW-04	Down↓	No	
Chloride	MW-05 MW-06	Down↓ Down↓	Yes Yes	
Chloride	MW-07	Up↑	Yes	No
Chloride	MW-08	Down ↓	No	
Chloride	MW-13	Down ↓	No	
Chloride Chloride	MW-14 MW-15	Down ↓ Down ↓	Yes No	
Chromium, Dissolved	MW-03	none	110	
Chromium, Dissolved	MW-04	none		
Chromium, Dissolved	MW-05	none		
Chromium, Dissolved Chromium, Dissolved	MW-06 MW-07	none none		
Chromium, Dissolved	MW-08	none		
Chromium, Dissolved	MW-13	none		
Chromium, Dissolved	MW-14	none		
Chromium, Dissolved Chromium, Total	MW-15 MW-03	none none		
Chromium, Total	MW-04	none		
Chromium, Total	MW-05	none		
Chromium, Total	MW-08	none		
Chromium, Total	MW-15	none		
Cobalt, Dissolved Cobalt, Dissolved	MW-03 MW-04	none	+	
Cobalt, Dissolved	MW-05	none		
Cobalt, Dissolved	MW-06	none		
Cobalt, Dissolved	MW-07	Down↓	No	
Cobalt, Dissolved Cobalt, Dissolved	MW-08	none		
Cobalt, Dissolved	MW-13 MW-14	none none		
Cobalt, Dissolved	MW-15	none		
Cobalt, Total	MW-03	none		
Cobalt, Total	MW-04	none		
Cobalt, Total Cobalt, Total	MW-05 MW-08	none	+	
Cobalt, Total	MW-15	none		
Fluoride	MW-03	Down ↓	No	
Fluoride	MW-04	Down ↓	No	
Fluoride	MW-05	Up ↑	No No	
Fluoride Fluoride	MW-06 MW-07	Down ↓ Down ↓	No No	
Fluoride	MW-08	Down↓	Yes	
Fluoride	MW-13	Down ↓	No	
Fluoride	MW-14	Down ↓	No	
Fluoride Lead, Dissolved	MW-15 MW-03	Down ↓ none	Yes	
Lead, Dissolved	MW-04	none		
Lead, Dissolved	MW-05	none		
Lead, Dissolved	MW-06	none		
Lead, Dissolved Lead, Dissolved	MW-07	none		
Lead, Dissolved Lead, Dissolved	MW-08 MW-13	none		
Lead, Dissolved	MW-14	none	<u> </u>	
Lead, Dissolved	MW-15	none		
Lead, Total	MW-03	none		
Lead, Total Lead, Total	MW-04 MW-05	none		
Lead, Total	MW-08	none		
Lead, Total	MW-15	none		
Lithium, Total	MW-03	none		
Lithium, Total Lithium, Total	MW-04 MW-05	none		
Lithium, Total	MW-08	none		
Lithium, Total	MW-15	Down ↓	No	
Mercury, Dissolved	MW-03	none		
Mercury, Dissolved	MW-04 MW-05	none		
Mercury, Dissolved Mercury, Dissolved	MW-05 MW-06	none		
Mercury, Dissolved	MW-07	none		
Mercury, Dissolved	MW-08	none		
Mercury, Dissolved	MW-13	none	-	
Mercury, Dissolved Mercury, Dissolved	MW-14 MW-15	none		
Mercury, Total	MW-03	none		
Mercury, Total	MW-04	none		
Mercury, Total	MW-05	none		

### Downgradient Groundwater Statistical Analysis Mann-Kendall Trend Tests Powerton Station

Constituent	Well	Trend	Statistically Significant Trend? (99% Confidence Level)	Has well with stat. sig upward trend ever exceeded a GW standard?
Mercury, Total	MW-08	none		
Mercury, Total	MW-15	none		
Molybdenum, Total	MW-03	none		
Molybdenum, Total	MW-04	none		
Molybdenum, Total	MW-05	Up ↑	No	
Molybdenum, Total Molybdenum, Total	MW-08 MW-15	Down↓	No No	
pH, Field	MW-03	Down ↓ Down ↓	No	
pH, Field	MW-04	Down 1	No	
pH, Field	MW-05	Down ↓	No	
pH, Field	MW-06	Down↓	No	
pH, Field	MW-07	Down↓	No	
pH, Field	MW-08	Down ↓	Yes	
pH, Field	MW-13	Up↑	No	
pH, Field	MW-14	Down ↓	Yes	
pH, Field	MW-15	Down ↓	No	
Radium 226 + 228, Combined	MW-03	none		
Radium 226 + 228, Combined	MW-04	none	No	
Radium 226 + 228, Combined Radium 226 + 228, Combined	MW-05 MW-08	Up↑	No	
Radium 226 + 228, Combined	MW-15	none		
Selenium, Dissolved	MW-03	none		
Selenium, Dissolved	MW-04	none		
Selenium, Dissolved	MW-05	none		
Selenium, Dissolved	MW-06	none		
Selenium, Dissolved	MW-07	none		
Selenium, Dissolved	MW-08	none		
Selenium, Dissolved	MW-13	Up↑	No	
Selenium, Dissolved	MW-14	none		
Selenium, Dissolved	MW-15	none		
Selenium, Total Selenium, Total	MW-03	none		
Selenium, Total	MW-04 MW-05	none		
Selenium, Total	MW-08	none		
Selenium, Total	MW-15	Down ↓	No	
Sulfate	MW-03	Down ↓	No	
Sulfate	MW-04	Down↓	No	
Sulfate	MW-05	Down↓	Yes	
Sulfate	MW-06	none		
Sulfate	MW-07	Up↑	No	
Sulfate	MW-08	Down ↓	Yes	
Sulfate	MW-13	Up ↑	Yes	Yes
Sulfate	MW-14	none	NT.	
Sulfate Thallium, Dissolved	MW-15 MW-03	Up↑	No	
Thallium, Dissolved	MW-04	none		
Thallium, Dissolved	MW-05	none		
Thallium, Dissolved	MW-06	none		
Thallium, Dissolved	MW-07	none		
Thallium, Dissolved	MW-08	none		
Thallium, Dissolved	MW-13	none		
Thallium, Dissolved	MW-14	Up ↑	No	
Thallium, Dissolved	MW-15	none		
Thallium, Total	MW-03	none		
Thallium, Total	MW-04	none		
Thallium, Total Thallium, Total	MW-05 MW-08	none		
Thallium, Total	MW-08 MW-15	none	1	
Total Dissolved Solids	MW-03	Down ↓	No	
Total Dissolved Solids	MW-04	Down ↓	Yes	
Total Dissolved Solids	MW-05	Down ↓	No	
Total Dissolved Solids	MW-06	Down ↓	No	
Total Dissolved Solids	MW-07	Down↓	Yes	
Total Dissolved Solids	MW-08	Down ↓	Yes	
Total Dissolved Solids	MW-13	Up ↑	Yes	Yes
Total Dissolved Solids	MW-14	Up↑	No	
Total Dissolved Solids	MW-15	Up↑	No	

Powerton Stats Summary:

70 30% Downward trends (25 significant) Upward trends (3 significant)
No trend 6% 15 148 64%

### 233 Total Tests Performed

85 Total Tests where a trend is present 82% of tests where a trend is present are downward 18% of tests where a trend is present are upward

### Downgradient Groundwater Statistical Analysis Mann-Kendall Trend Tests Will County Station

Constituent	Well	Trend	Statistically Significant Trend? (99% Confidence Level)	Has well with stat. sig upward trend ever exceeded a GW standard?
Antimony, Dissolved	MW-07	none		
Antimony, Dissolved	MW-08	none		
Antimony, Dissolved	MW-09	none		
Antimony, Dissolved	MW-10	none		
Antimony, Total	MW-09	none		
Antimony, Total	MW-10	none		
Antimony, Total	MW-11	none		
Antimony, Total	MW-12	none		
Arsenic, Dissolved	MW-07	Down↓	Yes	
Arsenic, Dissolved	MW-08	Down↓	Yes	
Arsenic, Dissolved	MW-09	Down↓	Yes	
Arsenic, Dissolved	MW-10	Up↑	No	
Arsenic, Total	MW-09	Down↓	No	
Arsenic, Total	MW-10	Down ↓	No	
Arsenic, Total	MW-11	Up↑	No	
Arsenic, Total	MW-12	Up↑	No	
Barium, Dissolved	MW-07	Down ↓	No	
Barium, Dissolved	MW-08	Down ↓	No	<b>N</b>
Barium, Dissolved	MW-09	Up↑	Yes	No
Barium, Dissolved	MW-10	Down ↓	No	
Barium, Total	MW-09	Up↑	No	
Barium, Total	MW-10	none	N.	
Barium, Total	MW-11	Up↑	No	
Barium, Total	MW-12	Up↑	No	
Beryllium, Dissolved	MW-07	none		
Beryllium, Dissolved Beryllium, Dissolved	MW-08 MW-09	none		
Beryllium, Dissolved	MW-10	none		
Beryllium, Total	MW-09	none		
Beryllium, Total	MW-10	none		
Beryllium, Total	MW-11	none		
Beryllium, Total	MW-12	none		
Boron, Dissolved	MW-07	none Down↓	No	
Boron, Dissolved	MW-08	Up ↑	No	
Boron, Dissolved	MW-09	none	140	
Boron, Dissolved	MW-10	Up↑	No	
Boron, Total	MW-09	none	110	
Boron, Total	MW-10	Down ↓	No	
Boron, Total	MW-11	none	110	
Boron, Total	MW-12	Down 1	No	
Cadmium, Dissolved	MW-07	none	110	
Cadmium, Dissolved	MW-08	none		
Cadmium, Dissolved	MW-09	none		
Cadmium, Dissolved	MW-10	none		
Cadmium, Total	MW-09	none		
Cadmium, Total	MW-10	none		
Cadmium, Total	MW-11	none		
Cadmium, Total	MW-12	none		
Calcium, Total	MW-09	Down ↓	No	
Calcium, Total	MW-10	Down ↓	No	
Calcium, Total	MW-11	Down ↓	No	
Calcium, Total	MW-12	Up↑	No	
Chloride	MW-07	Down↓	No	

### Downgradient Groundwater Statistical Analysis Mann-Kendall Trend Tests Will County Station

Constituent	Well	Trend	Statistically Significant Trend? (99% Confidence Level)	Has well with stat. sig upward trend ever exceeded a GW standard?
Chloride	MW-08	Down ↓	No	
Chloride	MW-09	Up↑	Yes	Yes*
Chloride	MW-10	none		
Chloride	MW-11	Up↑	No	
Chloride	MW-12	Down ↓	No	
Chromium, Dissolved	MW-07	none		
Chromium, Dissolved	MW-08	none		
Chromium, Dissolved	MW-09	none		
Chromium, Dissolved	MW-10	none		
Chromium, Total	MW-09	none		
Chromium, Total	MW-10	none		
Chromium, Total	MW-11	none		
Chromium, Total	MW-12	none		
Cobalt, Dissolved	MW-07	none		
Cobalt, Dissolved	MW-08	Up↑	Yes	No
Cobalt, Dissolved	MW-09	none		
Cobalt, Dissolved	MW-10	none		
Cobalt, Total	MW-09	none		
Cobalt, Total	MW-10	none		
Cobalt, Total	MW-11	none		
Cobalt, Total	MW-12	none		
Fluoride	MW-07	Down ↓	Yes	
Fluoride	MW-08	Down ↓	No	
Fluoride	MW-09	Up↑	No	
Fluoride	MW-10	Up ↑	Yes	No
Fluoride	MW-11	Down ↓	No	
Fluoride	MW-12	Down ↓	No	
Lead, Dissolved	MW-07	none		
Lead, Dissolved	MW-08	none		
Lead, Dissolved	MW-09	none		
Lead, Dissolved	MW-10	none		
Lead, Total	MW-09	none		
Lead, Total	MW-10	none		
Lead, Total	MW-11	none		
Lead, Total	MW-12	none		
Lithium, Total	MW-09	none		
Lithium, Total	MW-10	Down ↓	No	
Lithium, Total	MW-11	none		
Lithium, Total	MW-12	Down ↓	No	
Mercury, Dissolved	MW-07	none		
Mercury, Dissolved	MW-08	none		
Mercury, Dissolved	MW-09	none		
Mercury, Dissolved	MW-10	none		
Mercury, Total	MW-09	none		
Mercury, Total	MW-10	none		
Mercury, Total	MW-11	none		
Mercury, Total	MW-12	none		
Molybdenum, Total	MW-09	Down ↓	No	
Molybdenum, Total	MW-10	Up↑	No	
Molybdenum, Total	MW-11	Down ↓	No	
Molybdenum, Total	MW-12	Up ↑	No	
pH, Field	MW-07	Down ↓	Yes	
pH, Field	MW-08	Down ↓	Yes	

### Downgradient Groundwater Statistical Analysis Mann-Kendall Trend Tests Will County Station

Constituent	Well	Trend	Statistically Significant Trend? (99% Confidence Level)	Has well with stat. sig upward trend ever exceeded a GW standard?
pH, Field	MW-09	Down ↓	Yes	
pH, Field	MW-10	Down ↓	Yes	
Radium 226 + 228, Combined	MW-09	none		
Radium 226 + 228, Combined	MW-10	Down↓	No	
Radium 226 + 228, Combined	MW-11	Up↑	No	
Radium 226 + 228, Combined	MW-12	none		
Selenium, Dissolved	MW-07	Up↑	Yes	No
Selenium, Dissolved	MW-08	none		
Selenium, Dissolved	MW-09	Down ↓	Yes	
Selenium, Dissolved	MW-10	none		
Selenium, Total	MW-09	none		
Selenium, Total	MW-10	none		
Selenium, Total	MW-11	none		
Selenium, Total	MW-12	none		
Sulfate	MW-07	Down ↓	No	
Sulfate	MW-08	Up↑	No	
Sulfate	MW-09	Down ↓	Yes	
Sulfate	MW-10	Down ↓	Yes	
Sulfate	MW-11	Down↓	Yes	
Sulfate	MW-12	Down ↓	No	
Thallium, Dissolved	MW-07	none		
Thallium, Dissolved	MW-08	none		
Thallium, Dissolved	MW-09	none		
Thallium, Dissolved	MW-10	none		
Thallium, Total	MW-09	none		
Thallium, Total	MW-10	none		
Thallium, Total	MW-11	none		
Thallium, Total	MW-12	none		
Total Dissolved Solids	MW-07	none		
Total Dissolved Solids	MW-08	Up↑	No	
Total Dissolved Solids	MW-09	Down ↓	No	
Total Dissolved Solids	MW-10	Down↓	Yes	
Total Dissolved Solids	MW-11	none		
Total Dissolved Solids	MW-12	Up↑	No	

<sup>\*</sup>Choride covered under 2018 ASD.

### Will County Summary Stats:

38 27% Downward trends (13 significant)
22 16% Upward trends (5 significant)
80 57% No trend

### 140 Total Tests Performed

60 Total Tests where a trend is present 63% of tests where a trend is present are downward 37% of tests where a trend is present are upward

### Downgradient Groundwater Statistical Analysis Mann-Kendall Trend Tests Waukegan Station

Constituent	Well	Trend	Statistically Significant Trend? (99% Confidence Level)	Has well with SSI ever exceeded a GW standard?
Antimony, Dissolved	MW-01	none		
Antimony, Dissolved	MW-02	none		
Antimony, Dissolved	MW-03	none		
Antimony, Dissolved	MW-04	none		
Antimony, Total	MW-01	none		
Antimony, Total	MW-02	none		
Antimony, Total	MW-03	none		
Antimony, Total	MW-04	none		
Arsenic, Dissolved	MW-01	Up↑	No	
Arsenic, Dissolved	MW-02	Down ↓	No	
Arsenic, Dissolved	MW-03	Up↑	No	
Arsenic, Dissolved	MW-04	Up↑	No	
Arsenic, Total	MW-01	Down ↓	Yes	
Arsenic, Total	MW-02	Down ↓	Yes	
Arsenic, Total	MW-03	Down ↓	No	
Arsenic, Total	MW-04	Down ↓	No	
Barium, Dissolved	MW-01	Down ↓	No	
Barium, Dissolved	MW-02	Up↑	No	
Barium, Dissolved	MW-03	Up ↑	No	
Barium, Dissolved	MW-04	Up↑	No	
Barium, Total	MW-01	Up ↑	Yes	No
Barium, Total	MW-02	Up↑	No	
Barium, Total	MW-03	Up↑	No	
Barium, Total	MW-04	Down ↓	No	
Beryllium, Dissolved	MW-01	none		
Beryllium, Dissolved	MW-02	none		
Beryllium, Dissolved Beryllium, Dissolved	MW-03 MW-04	none		
Beryllium, Total	MW-04 MW-01	none		
Beryllium, Total	MW-01 MW-02	none		
Beryllium, Total	MW-03	none		
Beryllium, Total	MW-04	none		
Boron, Dissolved	MW-01	Down 1	Yes	
Boron, Dissolved	MW-02	Up ↑	Yes	Yes
Boron, Dissolved	MW-03	Up↑	No	1 03
Boron, Dissolved	MW-04	none	110	
Boron, Total	MW-01	Up↑	No	
Boron, Total	MW-02	Down ↓	No	
Boron, Total	MW-03	Up↑	No	
Boron, Total	MW-04	Up↑	No	
Cadmium, Dissolved	MW-01	none		
Cadmium, Dissolved	MW-02	none		
Cadmium, Dissolved	MW-03	none		
Cadmium, Dissolved	MW-04	none		
Cadmium, Total	MW-01	none		
Cadmium, Total	MW-02	none		
Cadmium, Total	MW-03	none		
Cadmium, Total	MW-04	none		
Calcium, Total	MW-01	Up↑	No	
Calcium, Total	MW-02	Up↑	No	
Calcium, Total	MW-03	Up↑	No	

### Downgradient Groundwater Statistical Analysis Mann-Kendall Trend Tests Waukegan Station

Constituent	Well	Trend	Statistically Significant Trend? (99% Confidence Level)	Has well with SSI ever exceeded a GW standard?
Calcium, Total	MW-04	none		
Chloride	MW-01	Up↑	No	
Chloride	MW-02	none		
Chloride	MW-03	Down ↓	No	
Chloride	MW-04	Down ↓	No	
Chromium, Dissolved	MW-01	none		
Chromium, Dissolved	MW-02	none		
Chromium, Dissolved	MW-03	none		
Chromium, Dissolved	MW-04	none		
Chromium, Total	MW-01	none		
Chromium, Total	MW-02	none		
Chromium, Total	MW-03	none		
Chromium, Total	MW-04	none		
Cobalt, Dissolved	MW-01	none		
Cobalt, Dissolved	MW-02	none		
Cobalt, Dissolved	MW-03	none		
Cobalt, Dissolved	MW-04	none		
Cobalt, Total	MW-01	none		
Cobalt, Total	MW-02	none		
Cobalt, Total	MW-03	none		
Cobalt, Total	MW-04	none		
Fluoride	MW-01	Down ↓	Yes	
Fluoride	MW-02	none		
Fluoride	MW-03	Down↓	Yes	
Fluoride	MW-04	Down ↓	No	
Lead, Dissolved	MW-01	none		
Lead, Dissolved	MW-02	none		
Lead, Dissolved	MW-03	none		
Lead, Dissolved	MW-04	none		
Lead, Total	MW-01	none		
Lead, Total	MW-02	none		
Lead, Total	MW-03	none		
Lead, Total	MW-04	none		
Lithium, Total	MW-01	none		
Lithium, Total	MW-02	none		
Lithium, Total	MW-03	none		
Lithium, Total	MW-04	none		
Mercury, Dissolved	MW-01	none		
Mercury, Dissolved	MW-02	none		
Mercury, Dissolved	MW-03	none		
Mercury, Dissolved	MW-04	none		
Mercury, Total	MW-01	none		
Mercury, Total	MW-02	none		
Mercury, Total	MW-03	none		
Mercury, Total	MW-04	none		
Molybdenum, Total	MW-01	Down ↓	No	
Molybdenum, Total	MW-02	Down ↓	No	
Molybdenum, Total	MW-03	Up↑	No	
Molybdenum, Total	MW-04	Up↑	No	
pH, Field	MW-01	Down ↓	No	
pH, Field	MW-02	Down ↓	No	
P11, 1 101G	111 11 -02	DOMIT 1	110	<u> </u>

### Downgradient Groundwater Statistical Analysis Mann-Kendall Trend Tests Waukegan Station

Constituent	Well	Trend	Statistically Significant Trend? (99% Confidence Level)	Has well with SSI ever exceeded a GW standard?				
pH, Field	MW-03	Down↓	Yes					
pH, Field	MW-04	Down ↓	Yes					
Radium-226	MW-01	none						
Radium-226	MW-02	none						
Radium-226	MW-03	none						
Radium-228	MW-01	none						
Radium-228	MW-02	none						
Radium-228	MW-03	none						
Radium-228	MW-04	Down ↓	No					
Selenium, Dissolved	MW-01	Down ↓	No					
Selenium, Dissolved	MW-02	Down↓	Yes					
Selenium, Dissolved	MW-03	Down↓	Yes					
Selenium, Dissolved	MW-04	Down ↓	No					
Selenium, Total	MW-01	Down ↓	No					
Selenium, Total	MW-02	none						
Selenium, Total	MW-03	none						
Selenium, Total	MW-04	none						
Sulfate	MW-01	Up↑	No					
Sulfate	MW-02	Up↑	No					
Sulfate	MW-03	Up↑	Yes	No				
Sulfate	MW-04	Up↑	No					
Thallium, Dissolved	MW-01	none						
Thallium, Dissolved	MW-02	none						
Thallium, Dissolved	MW-03	none						
Thallium, Dissolved	MW-04	none						
Thallium, Total	MW-01	none						
Thallium, Total	MW-02	none						
Thallium, Total	MW-03	none						
Thallium, Total	MW-04	none						
Total Dissolved Solids	MW-01	Up↑	No					
Total Dissolved Solids	MW-02	Up↑	Yes	No				
Total Dissolved Solids	MW-03	Up↑	Yes	No				
Total Dissolved Solids	MW-04	Up↑	Yes	No				

Waukegan Stats Summary:

26 19% Downward trends (9 significant)
28 21% Upward trends (6 significant)

81 60% No trend

### 135 Total Tests Performed

54 Total Tests where a trend is present 48% of tests where a trend is present are downward 52% of tests where a trend is present are upward

### Trend Test

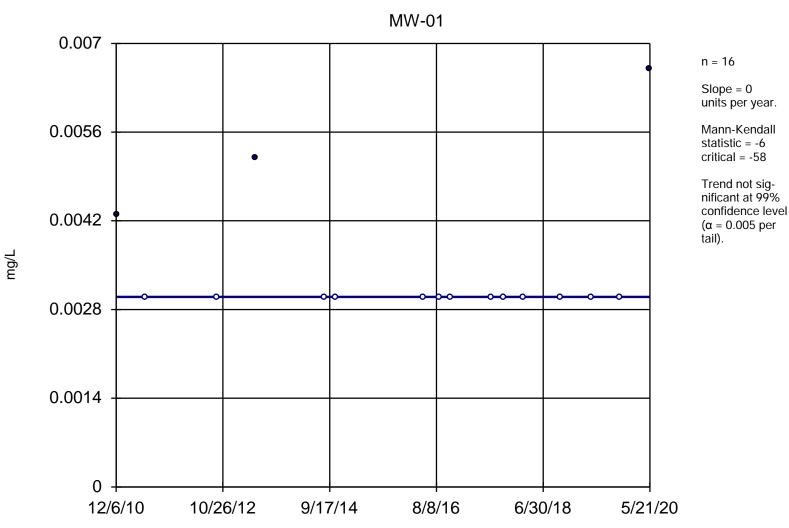
	Utility Site J	Client: Weaver C	onsultants Grou	ıp Data: Jolie	et 29 Sanit	as Database	e Printed	l 4/2/2021, 11:0	5 AM		
Constituent	Well	Slope	Calc.	Critical	Sig.	<u>N</u>	%NDs	Normality	<u>Xform</u>	<u>Alpha</u>	Method
Antimony, Dissolved (mg/L)	MW-01	0	-6	-58	No	16	81.25	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-02	0	-96	-176	No	34	91.18	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-03	0	-128	-223	No	40	90	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-04	0	-80	-223	No	40	92.5	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-06	0	-21	-223	No	40	97.5	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-07	0	0	223	No	40	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-03	0	0	30	No	10	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-04	0	0	30	No	10	100	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-01	0	-33	-58	No	16	68.75	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-02	0	-23	-176	No	34	97.06	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-03	-6.3e-12	-100	-223	No	40	27.5	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-04	0	36	223	No	40	45	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-06	-0.00	-196	-223	No	40	22.5	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-07	0	-104	-223	No	40	60	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-03	0.000	10	30	No	10	0	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-04	0	3	30	No	10	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-01	-0.01058	-56	-58	No	16	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-02	-0.00	-178	-176	Yes	34	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-03	0.000	177	223	No	40	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-04	0.002242	336	223	Yes	40	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-06	0.002711	206	223	No	40	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-07	0	50	223	No	40	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-03	-0.00	-13	-30	No	10	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-04	-0.00	-11	-30	No	10	0	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-01	0	0	58	No	16	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-02	0	0	176	No	34	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-03	0	0	223	No	40	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-04	0	0	223	No	40	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-06	0	0	223	No	40	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-07	0	0	223	No	40	100	n/a	n/a	0.01	NP
Beryllium, Total (mg/L)	MW-03	0	0	30	No	10	100	n/a	n/a	0.01	NP
Beryllium, Total (mg/L)	MW-04	0	0	30	No	10	100	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-01	-0.00	-25	-58	No	16	0	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-02	-0.02673	-356	-176	Yes	34	0	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-03	0.000	19	223	No	40	0	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-04	-0.00	-128	-223	No	40	0	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-06	-0.00	-229	-223	Yes	40	0	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-07	-0.00	-191	-223	No	40	0	n/a	n/a	0.01	NP
Boron, Total (mg/L)	MW-03	-0.02859	-6	-38	No	12	0	n/a	n/a	0.01	NP
Boron, Total (mg/L)	MW-04	0	0	38	No	12	0	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-01	0	0	58	No	16	100	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-02	0	-13	-176	No	34	94.12	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-03	0	-29	-223	No	40	97.5	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-04	0	0	223	No	40	100	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-06	0	0	223	No	40	100	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-07	0	-7	-223	No	40	97.5	n/a	n/a	0.01	NP
Cadmium, Total (mg/L)	MW-03	0	0	30	No	10	100	n/a	n/a	<sub>0.0</sub> MWG13	
Cadmium Total (mg/L)	M\\\_04	n	n	30	No	10	100	n/a	n/a	0.01	NP

**Trend Test** Page 2

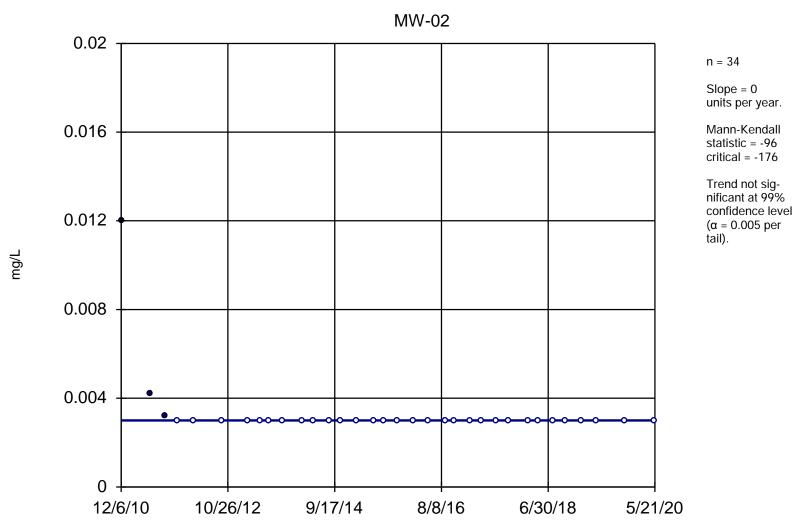
	Utility Site J C	lient: Weaver C	Consultants Gro	up Data: Joli	et 29 Sanita	as Databas	se Printed	d 4/2/2021, 11:0	5 AM		
Constituent	<u>Well</u>	Slope	Calc.	Critical	Sig.	<u>N</u>	%NDs	Normality	<u>Xform</u>	<u>Alpha</u>	Method
Chloride (mg/L)	MW-01	-3.938	-11	-58	No	16	0	n/a	n/a	0.01	NP
Chloride (mg/L)	MW-02	0	-4	-176	No	34	0	n/a	n/a	0.01	NP
Chloride (mg/L)	MW-03	-8.834	-3.043	-2.58	Yes	41	0	n/a	n/a	0.01	NP
Chloride (mg/L)	MW-04	-4.891	-2.294	-2.58	No	41	0	n/a	n/a	0.01	NP
Chloride (mg/L)	MW-06	0	-13	-223	No	40	0	n/a	n/a	0.01	NP
Chloride (mg/L)	MW-07	-1.487	-40	-223	No	40	0	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-01	0	0	58	No	16	100	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-02	0	0	176	No	34	100	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-03	0	0	223	No	40	100	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-04	0	13	223	No	40	97.5	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-06	0	0	223	No	40	100	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-07	0	0	223	No	40	100	n/a	n/a	0.01	NP
Chromium, Total (mg/L)	MW-03	0	-1	-30	No	10	90	n/a	n/a	0.01	NP
Chromium, Total (mg/L)	MW-04	0	7	30	No	10	90	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-01	0	15	58	No	16	87.5	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-02	0	-10	-176	No	34	85.29	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-03	0	-76	-223	No	40	95	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-04	0.000	74	223	No	40	15	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-06	0.000	-62	-223	No	40	87.5	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-07	0	-41	-223	No	40	95	n/a	n/a	0.01	NP
Cobalt, Total (mg/L)	MW-03	0	0	30	No	10	100	n/a	n/a	0.01	NP
Cobalt, Total (mg/L)	MW-04	0.000	1	30	No	10	0	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-01	-0.01075	-52	-58	No	16	0	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-02	-0.01073 -0.02597	-321	-176	Yes	<b>34</b>	0	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-03	0.02397	0.2372	2.58	No	41	0	n/a	n/a	0.01	NP NP
Fluoride (mg/L)	MW-04	0	-0.486	-2.58	No	41	0	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-06	- <b>0.0074</b>	-31 <b>5</b>	-2.36 - <b>223</b>	Yes	40	0	n/a n/a	n/a	0.01	NP
	MW-07	-0.0074	-320	-223 -223	Yes	40	0	n/a		0.01	NP
Fluoride (mg/L) Lead, Dissolved (mg/L)	MW-01	- <b>0.00</b> 0	- <b>320</b> 0	<b>-223</b> 58	No	<b>40</b> 16	100	n/a	<b>n/a</b> n/a	0.01	NP NP
Lead, Dissolved (mg/L)	MW-02	0	0	176	No	34	100	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-03	0	0	223	No	40	100	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-04	0	-23	-223	No	40	97.5	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-06	0	0	223	No	40	100	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L) Lead, Dissolved (mg/L)	MW-07	0	-7	-223 -223	No	40	92.5	n/a n/a	n/a	0.01	NP NP
Lead, Total (mg/L)	MW-03	0	0	30	No	10	100	n/a	n/a	0.01	NP
Lead, Total (mg/L)	MW-04	0	4	30	No	10			n/a	0.01	NP
Lithium, Total (mg/L)	MW-03	0	<del>-</del> 7	-30	No	10	60 10	n/a n/a	n/a	0.01	NP
Lithium, Total (mg/L)	MW-04	0.000	- <i>r</i> 15	30	No	10	0	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-01	0.000	0	58	No	16	100	n/a n/a	n/a	0.01	NP NP
Mercury, Dissolved (mg/L)	MW-02	0	0	176	No	34	100	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-03	0	0	223		40			n/a	0.01	NP
Mercury, Dissolved (mg/L)  Mercury, Dissolved (mg/L)	MW-04	0	0	223	No No	40	100 100	n/a n/a	n/a n/a	0.01	NP NP
Mercury, Dissolved (mg/L)  Mercury, Dissolved (mg/L)	MW-06	0	0	223	No					0.01	NP NP
Mercury, Dissolved (mg/L)  Mercury, Dissolved (mg/L)	MW-07	0	0	223	No	40 40	100	n/a n/a	n/a n/a	0.01	NP NP
Mercury, Total (mg/L)	MW-03	0	0	30	No	10	100 100	n/a n/a	n/a n/a	0.01	NP NP
Mercury, Total (mg/L)  Mercury, Total (mg/L)	MW-04	0	0	30		10				0.01	NP NP
· · · · · · · · · · · · · · · · · · ·			9	30	No No		100	n/a	n/a	0.01 0.0 <b>M</b> WG13	
Molybdenum, Total (mg/L) Molybdenum, Total (mg/L)	MW-03 M//-04	0.000 0.000	9 1 <i>4</i>	30 30	No No	10 10	10 0	n/a n/a	n/a n/a	0.01	NP
							••				

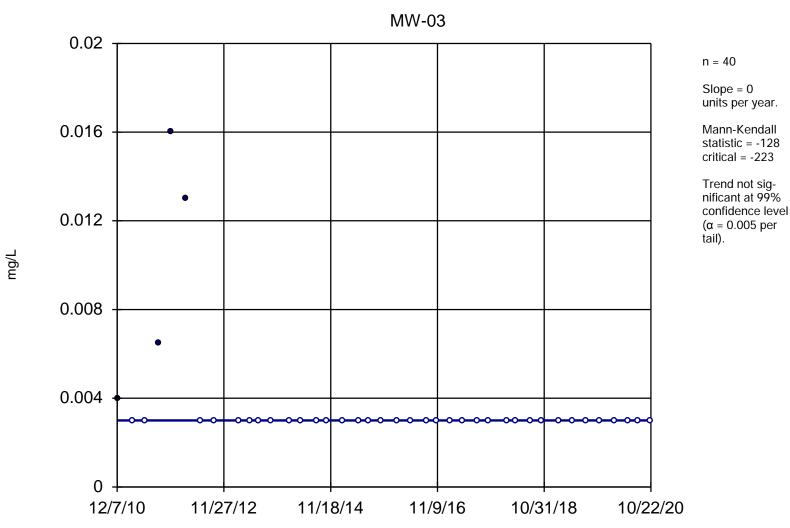
	Utility Site J Clie	ent: Weaver Co	nsultants Group	Data: Joliet	29 Sanita	s Database	Printed	4/2/2021, 11:05	AM		
Constituent	<u>Well</u>	Slope	Calc.	Critical	Sig.	<u>N</u>	%NDs	Normality	<u>Xform</u>	<u>Alpha</u>	Method
pH, Field (Standard Units)	MW-03	-0.0136	-113	-214	No	39	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-04	-0.01699	-116	-214	No	39	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-06	-0.03421	-202	-214	No	39	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-07	-0.03777	-246	-214	Yes	39	0	n/a	n/a	0.01	NP
Radium 226 + Radium 228, Combin	MW-03	0	-2	-30	No	10	70	n/a	n/a	0.01	NP
Radium 226 + Radium 228, Combin	MW-04	0	-6	-30	No	10	70	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-01	0.000	44	58	No	16	37.5	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-02	0	-102	-176	No	34	79.41	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-03	0	26	223	No	40	32.5	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-04	0	39	223	No	40	82.5	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-06	-0.00	-155	-223	No	40	27.5	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-07	0	26	223	No	40	82.5	n/a	n/a	0.01	NP
Selenium, Total (mg/L)	MW-03	0.000	5	30	No	10	10	n/a	n/a	0.01	NP
Selenium, Total (mg/L)	MW-04	0	17	30	No	10	80	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-01	-4.6	-30	-58	No	16	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-02	-7.826	-175	-176	No	34	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-03	-6.868	-3.501	-2.58	Yes	41	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-04	-5.06	-2.356	-2.58	No	41	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-06	-0.4307	-49	-223	No	40	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-07	-5.456	-215	-223	No	40	0	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-01	0	0	58	No	16	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-02	0	0	176	No	34	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-03	0	0	223	No	40	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-04	0	0	223	No	40	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-06	0	0	223	No	40	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-07	0	0	223	No	40	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-03	0	0	30	No	10	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-04	0	0	30	No	10	100	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-01	12.34	24	58	No	16	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-02	3.834	21	176	No	34	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-03	-27.74	-4.189	-2.58	Yes	41	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-04	-17.39	-2.826	-2.58	Yes	41	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-06	0	-4	-223	No	40	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-07	-9.923	-96	-223	No	40	0	n/a	n/a	0.01	NP

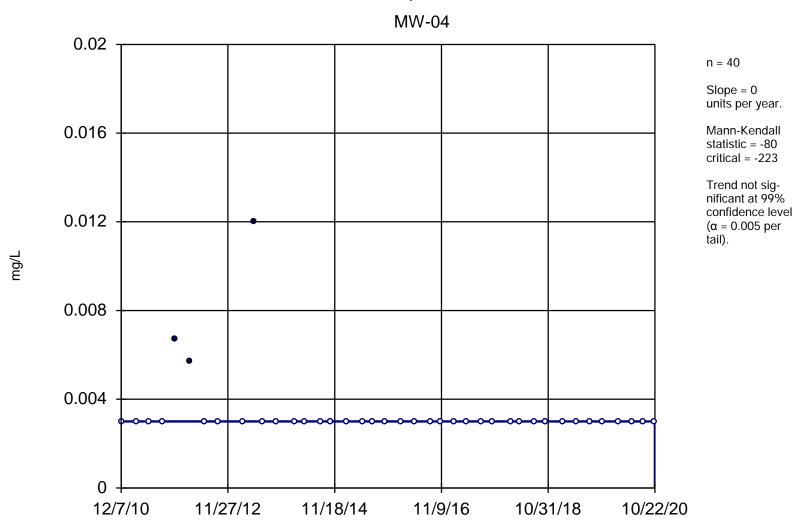
### Sen's Slope Estimator

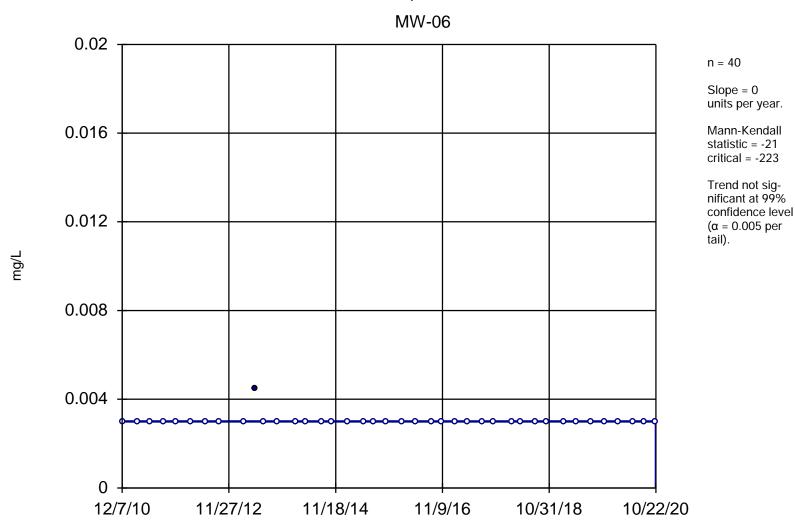


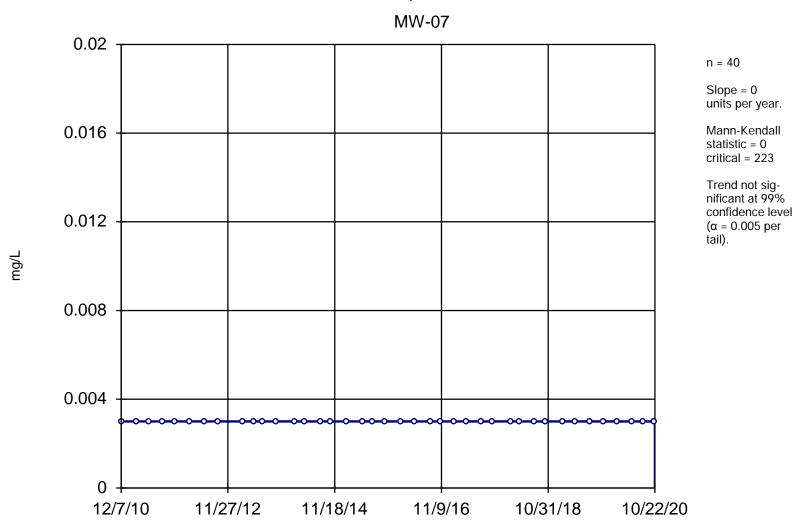
Constituent: Antimony, Dissolved Analysis Run 4/2/2021 11:00 AM
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

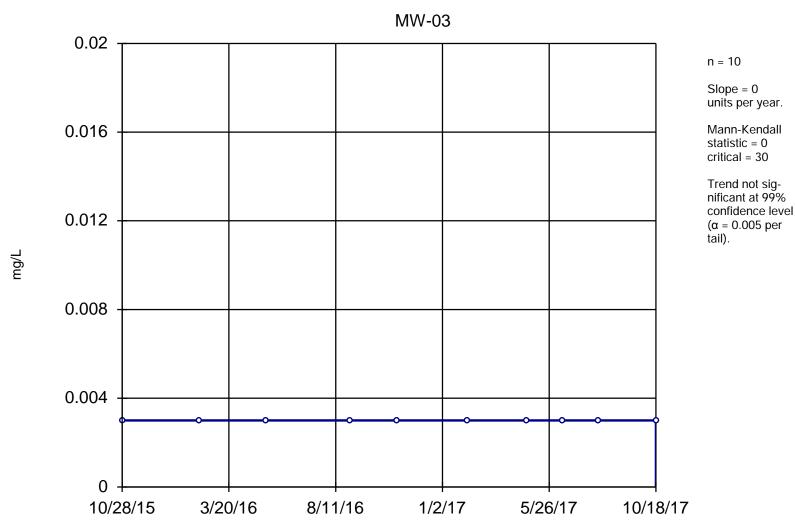






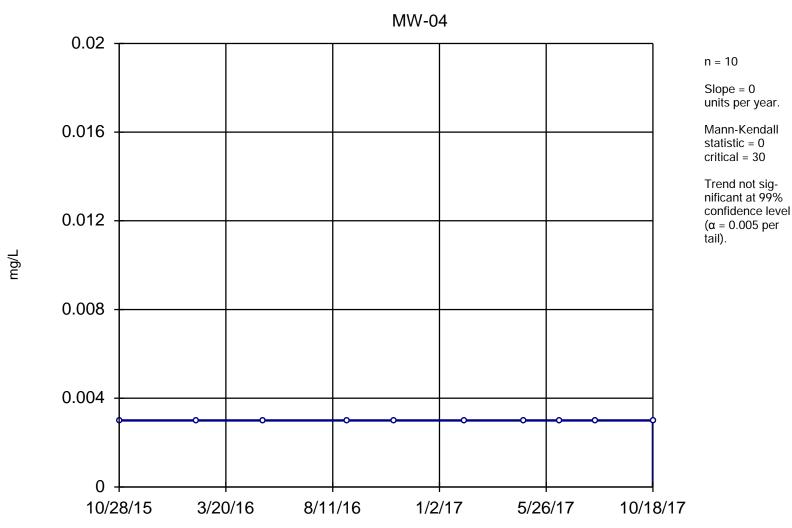




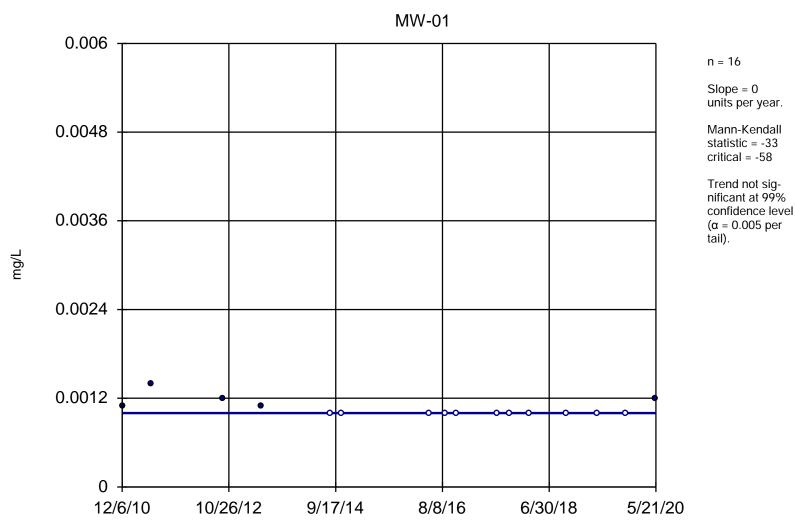


Constituent: Antimony, Total Analysis Run 4/2/2021 11:00 AM

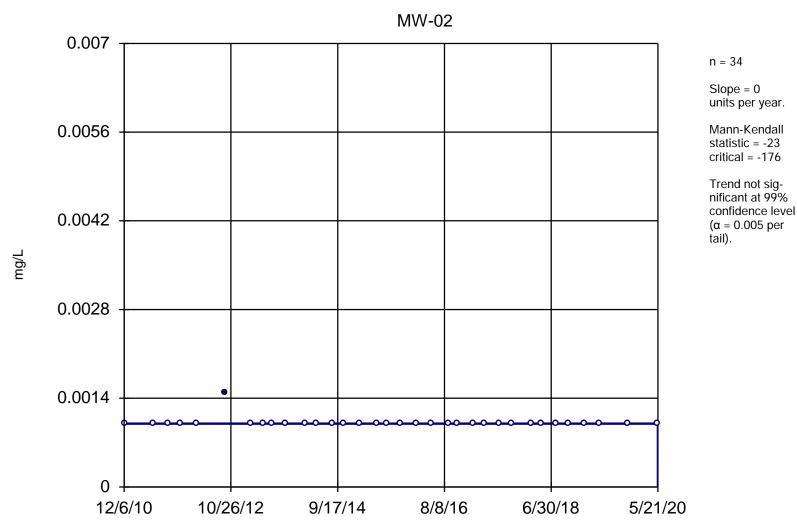
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



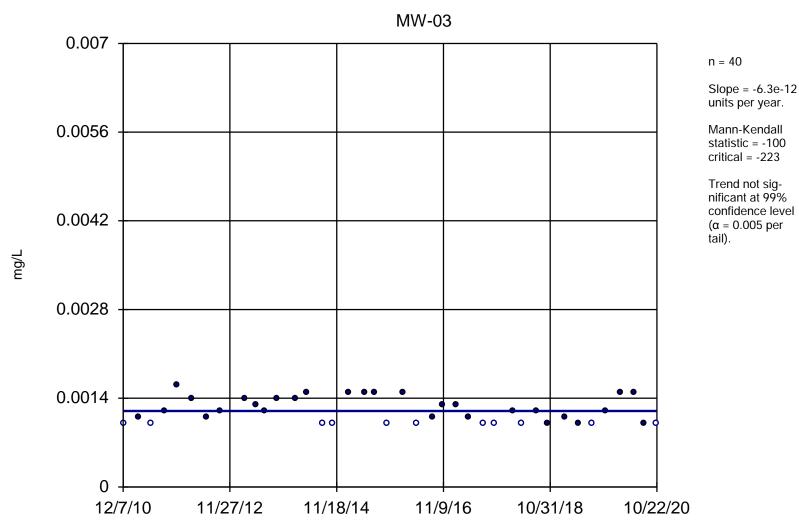
Constituent: Antimony, Total Analysis Run 4/2/2021 11:00 AM



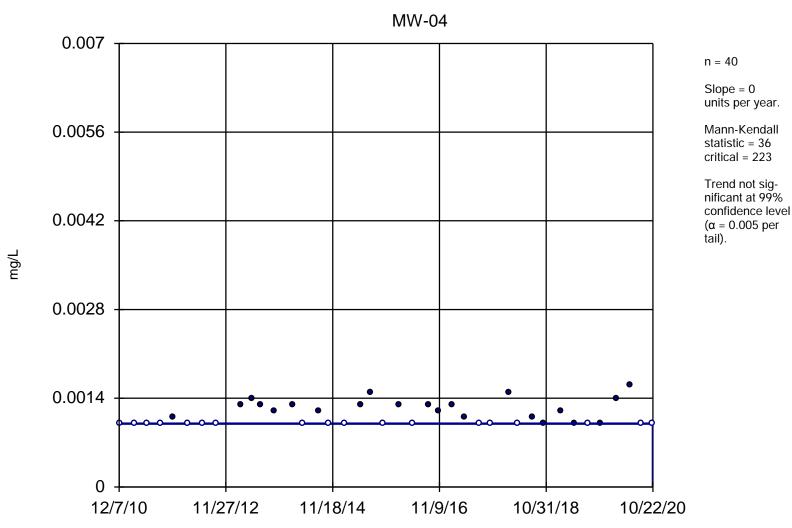
Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:00 AM



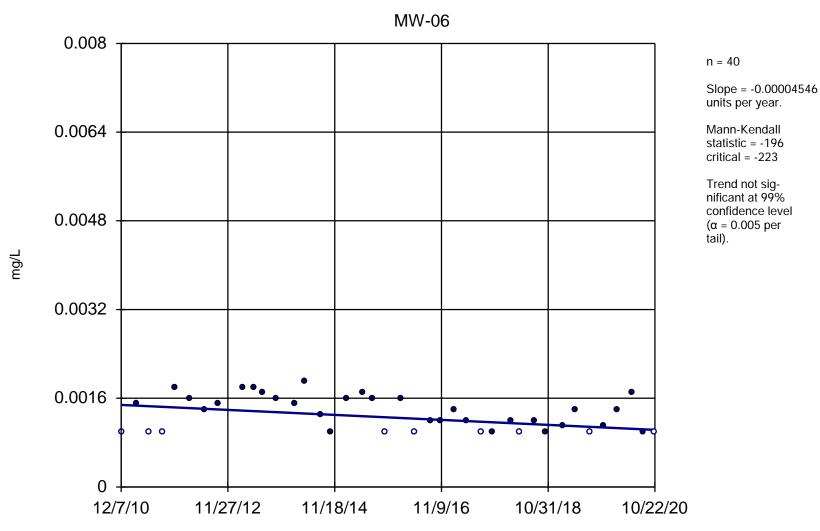
Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:00 AM



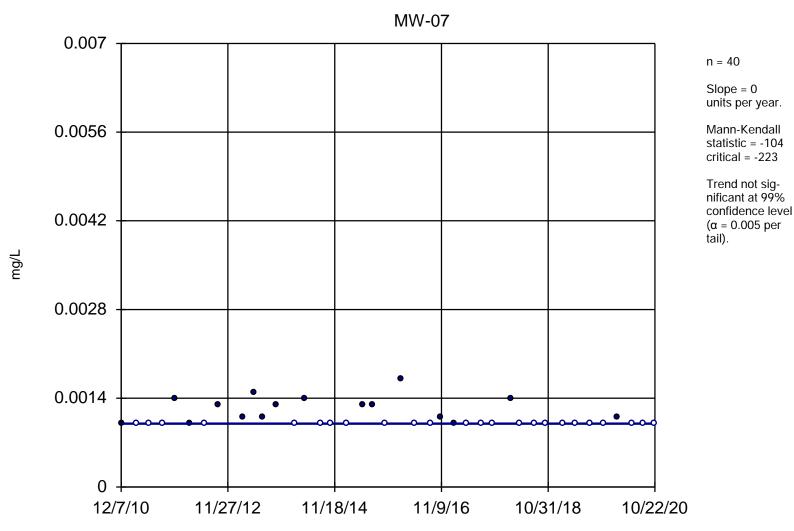
Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:00 AM



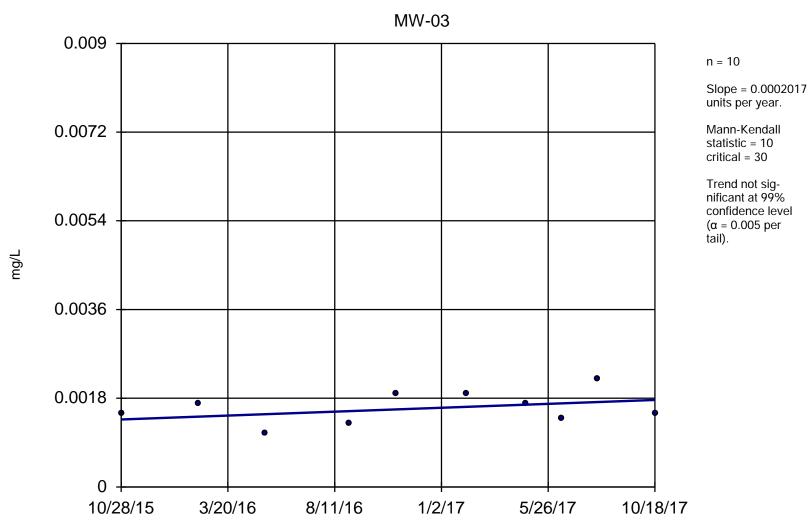
Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:00 AM



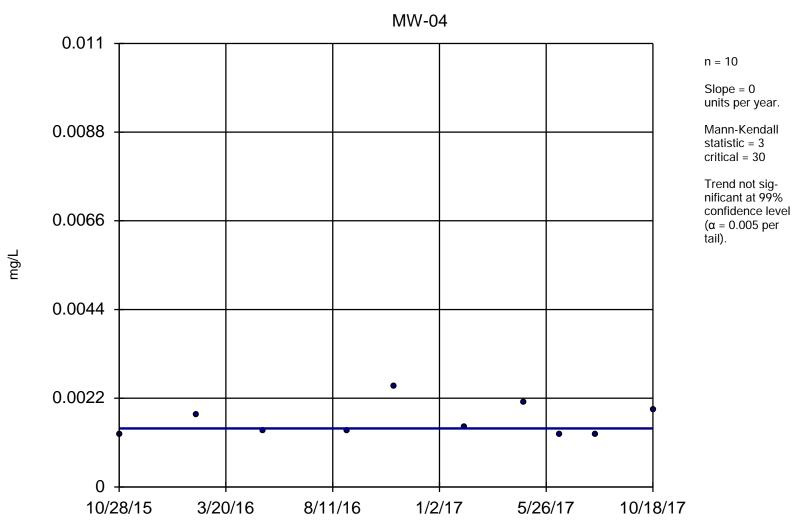
Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:00 AM

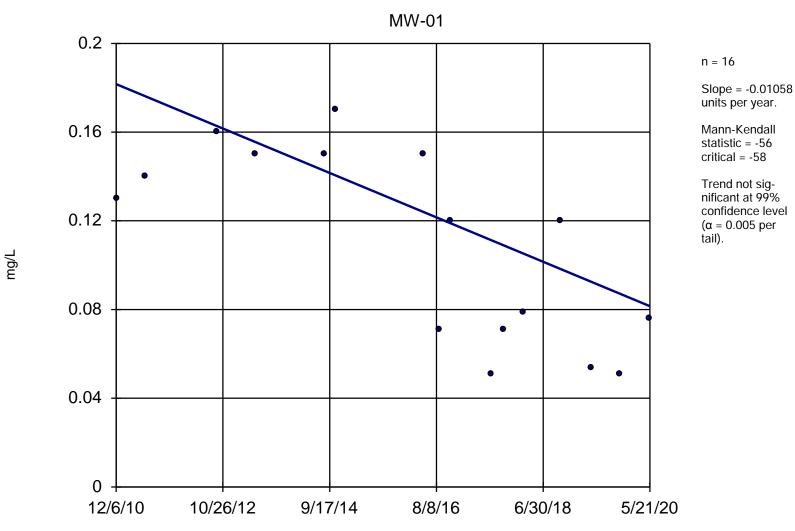


Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:00 AM

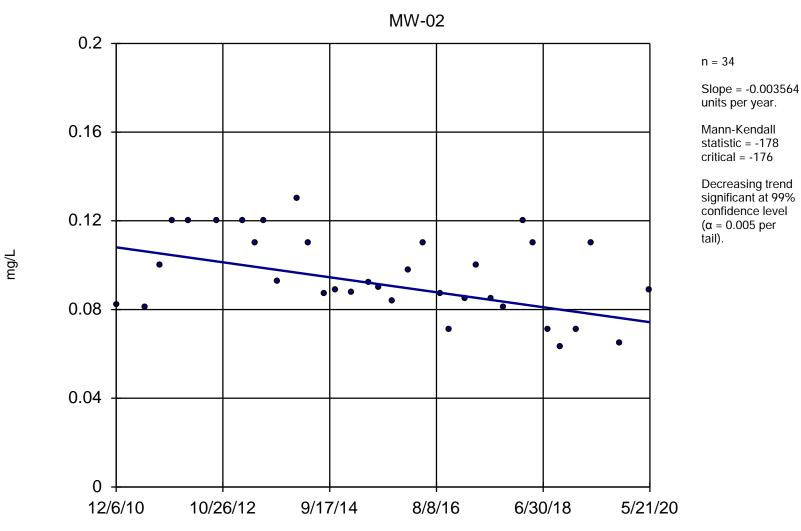


Constituent: Arsenic, Total Analysis Run 4/2/2021 11:00 AM

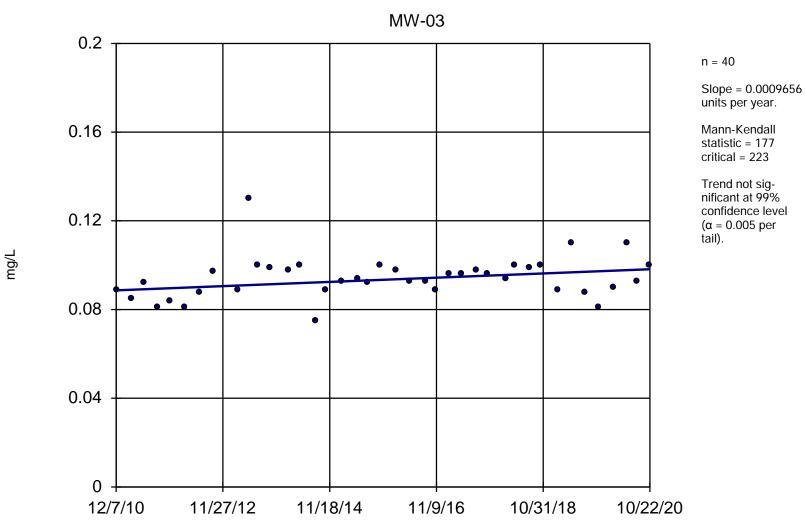




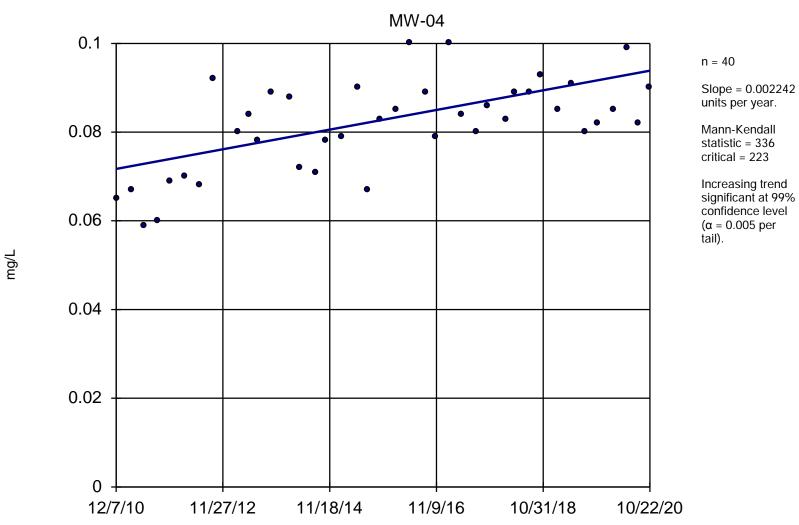
Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:00 AM



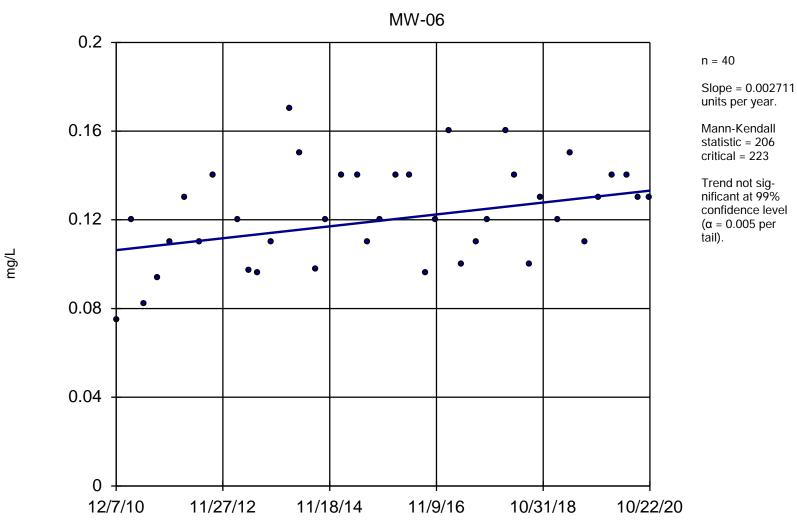
Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:00 AM



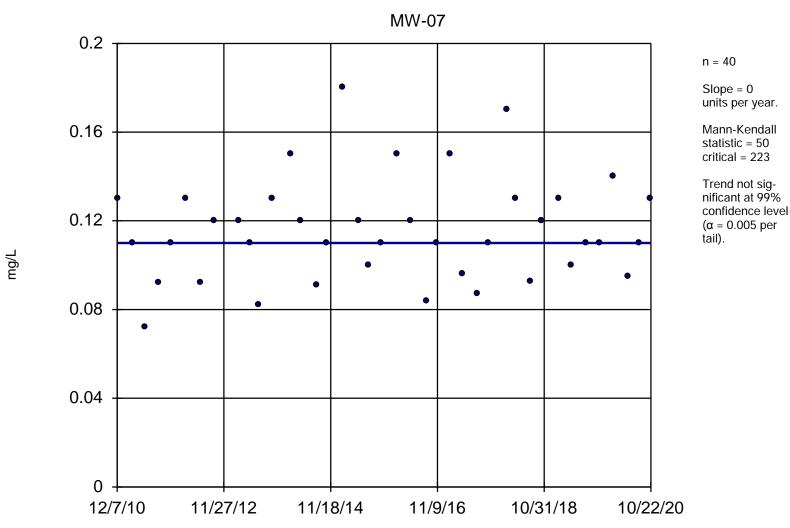
Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:00 AM



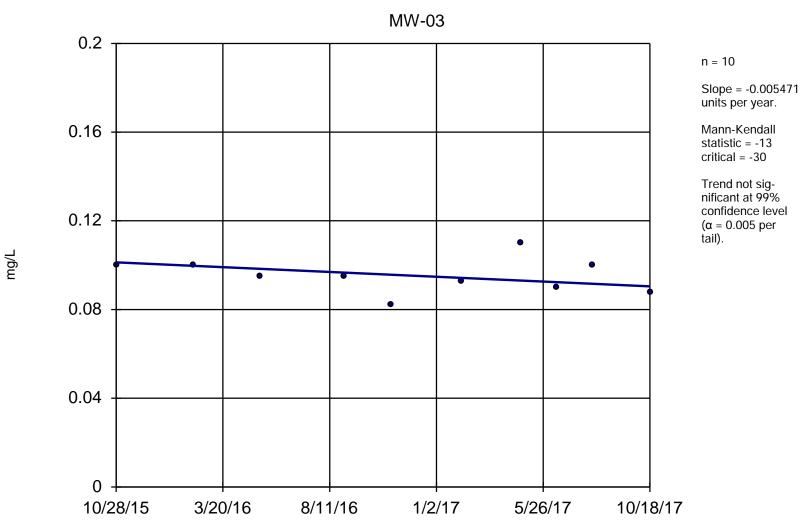
Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:01 AM



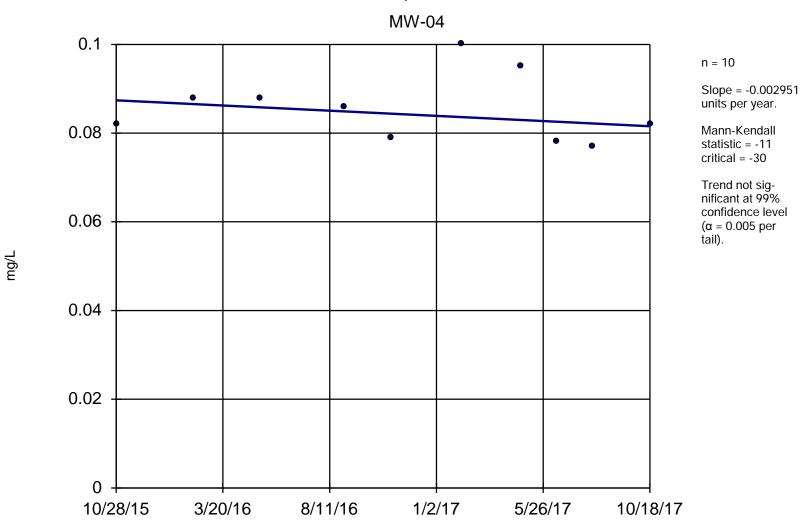
Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:01 AM



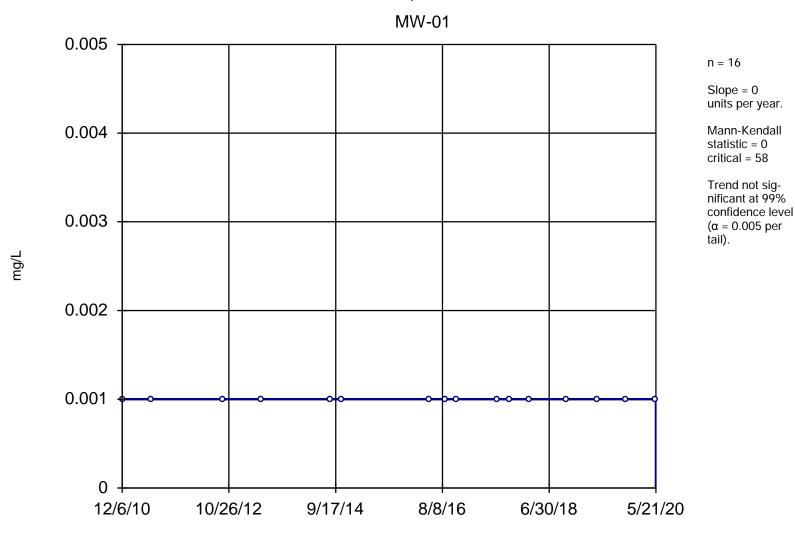
Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:01 AM

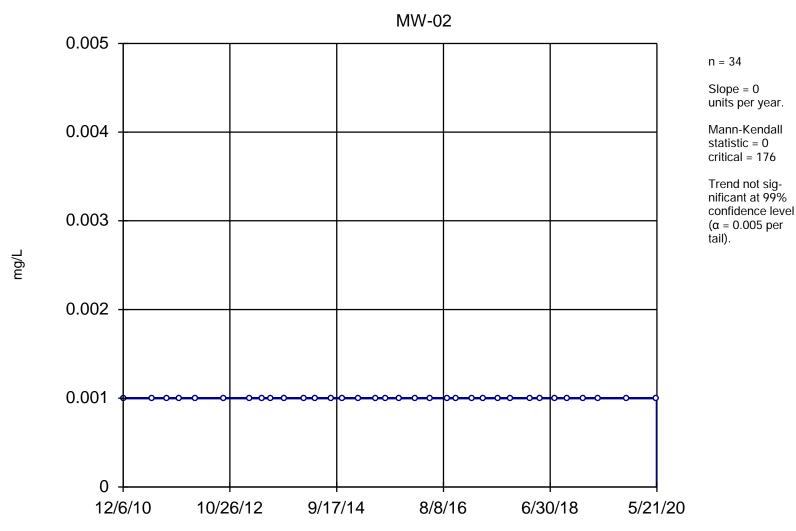


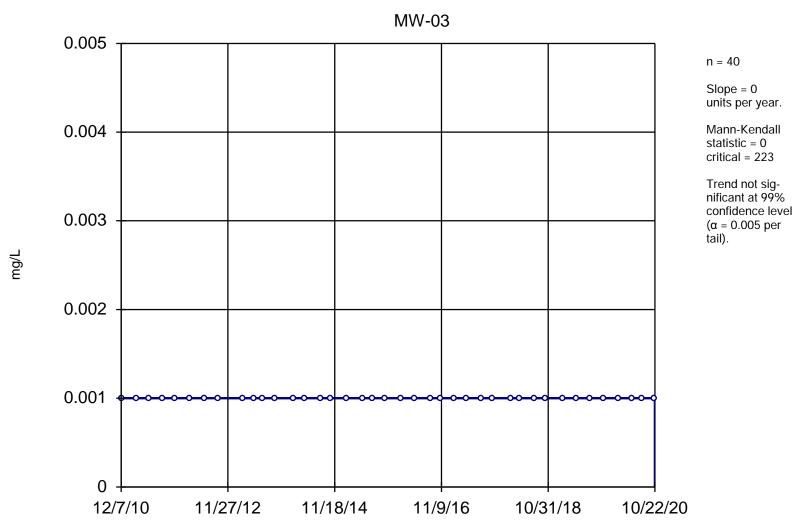
Constituent: Barium, Total Analysis Run 4/2/2021 11:01 AM

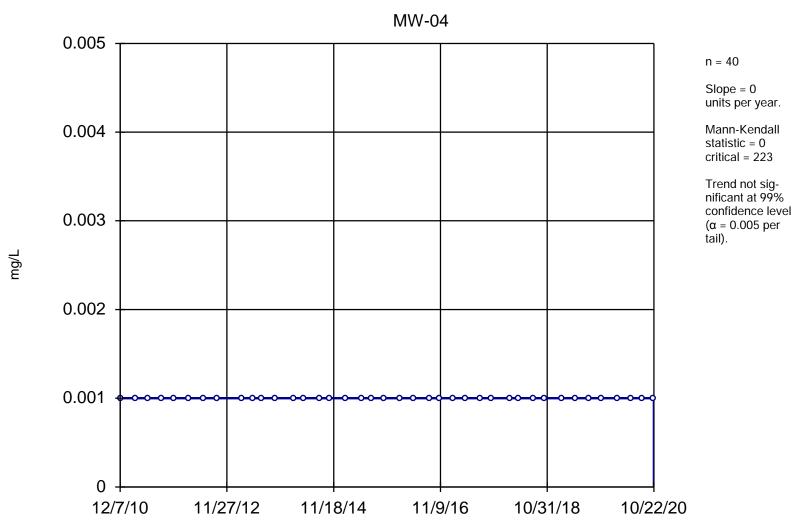


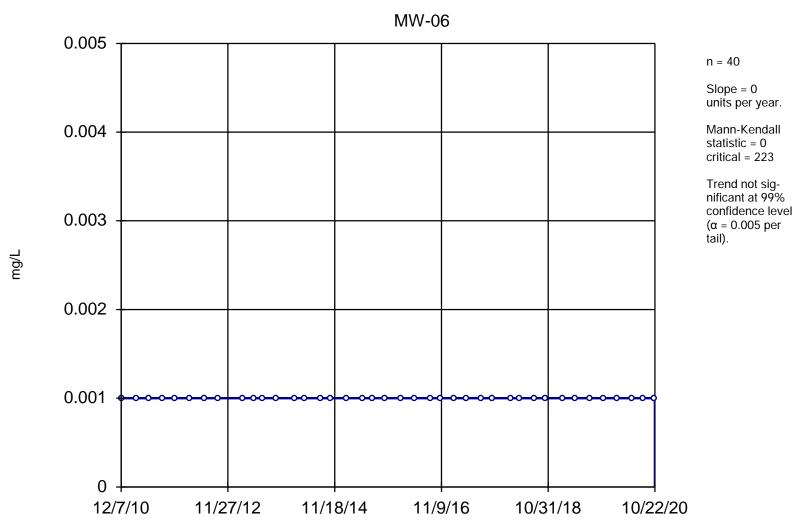
Constituent: Barium, Total Analysis Run 4/2/2021 11:01 AM

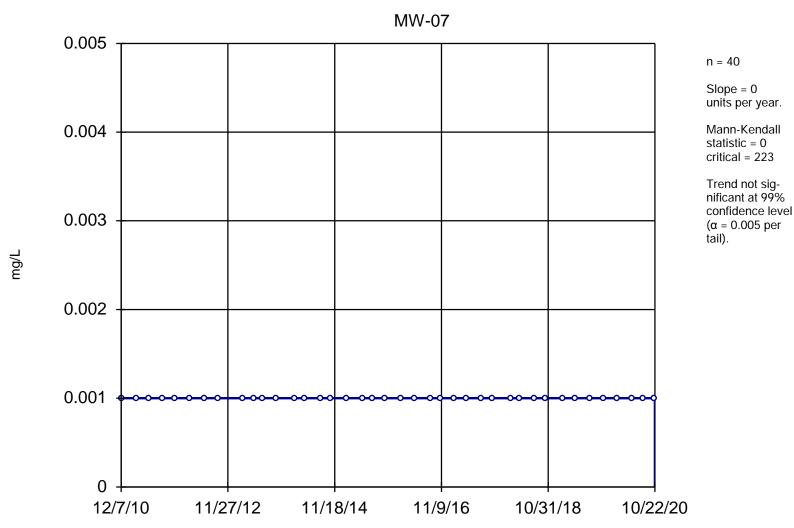


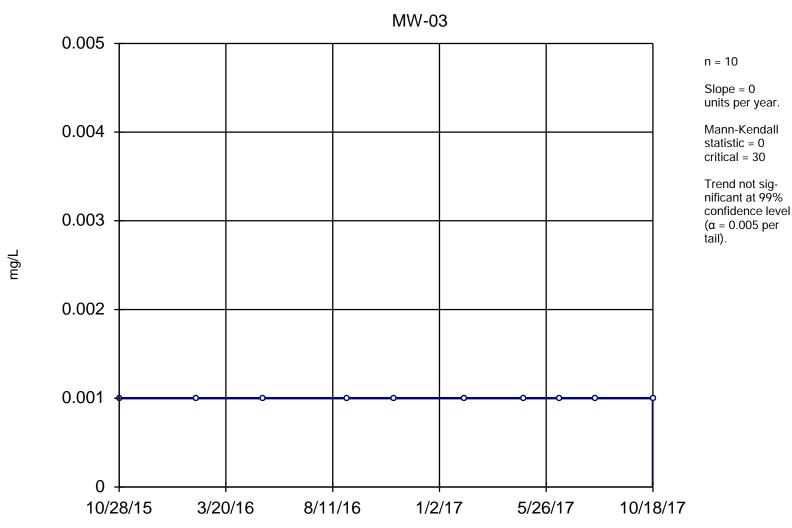


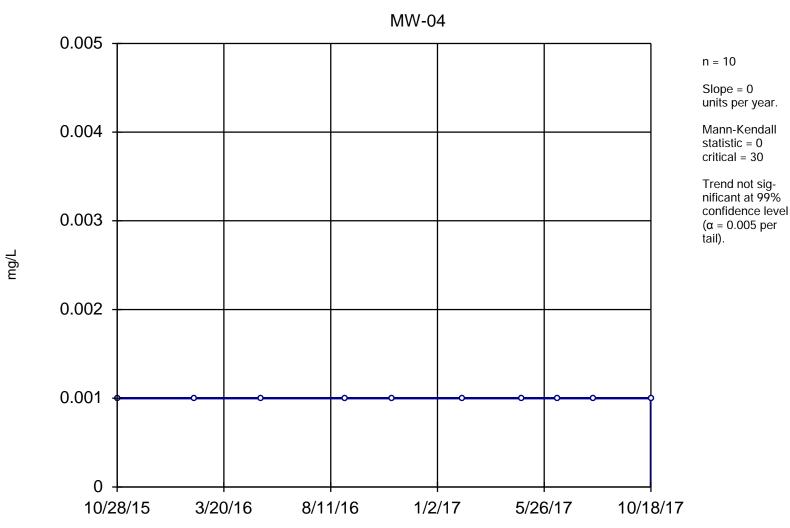




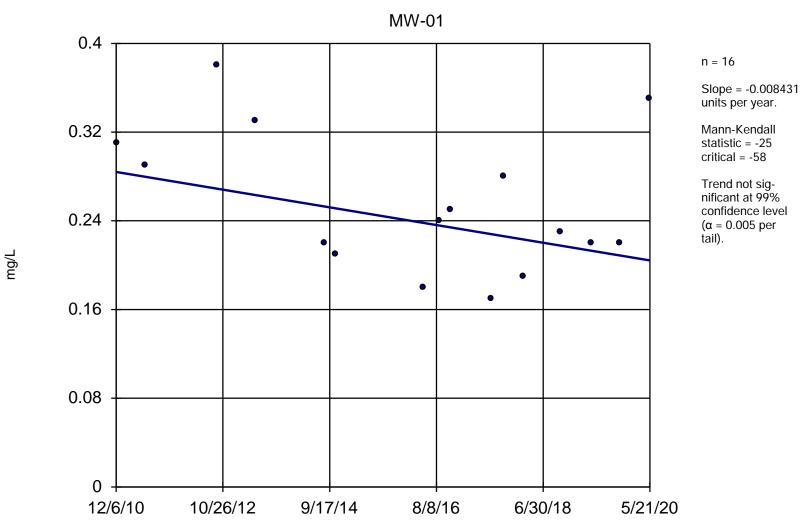


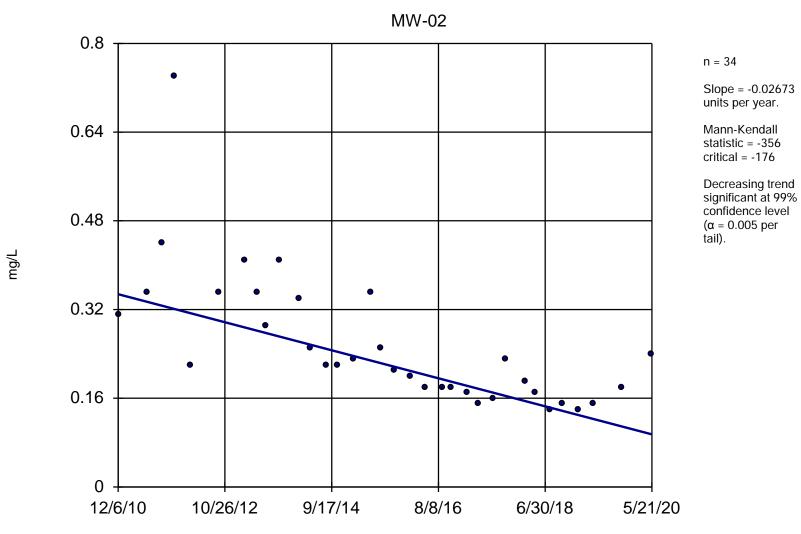




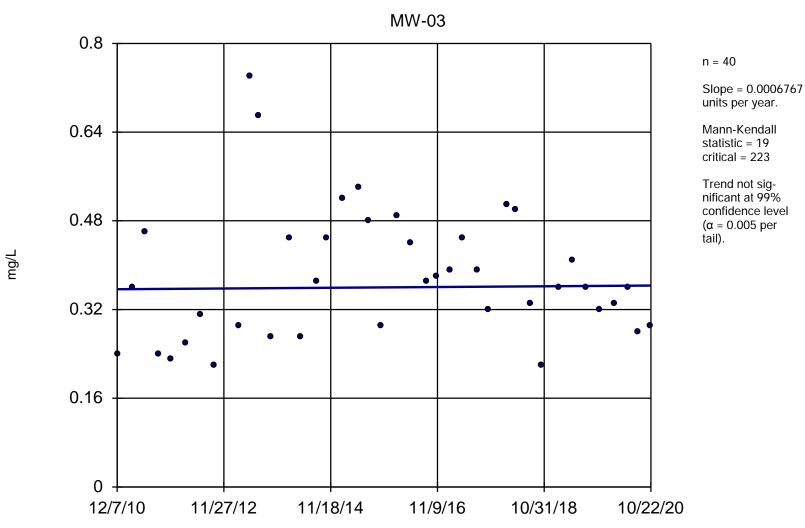


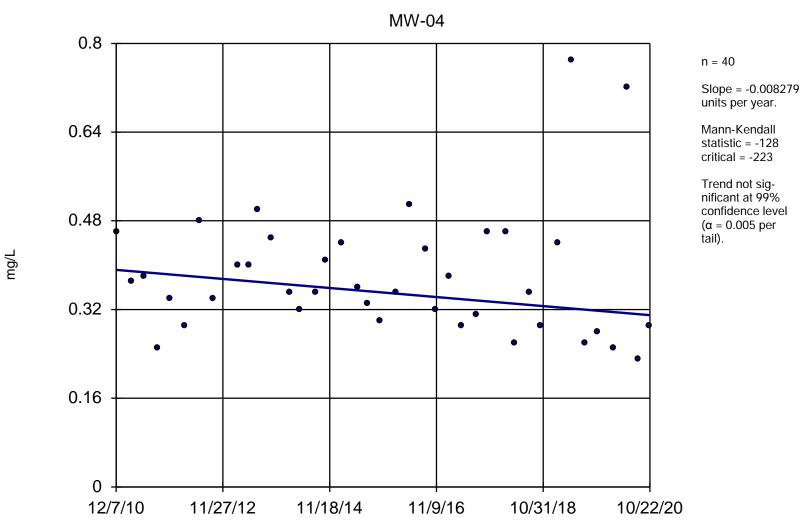
Constituent: Beryllium, Total Analysis Run 4/2/2021 11:01 AM





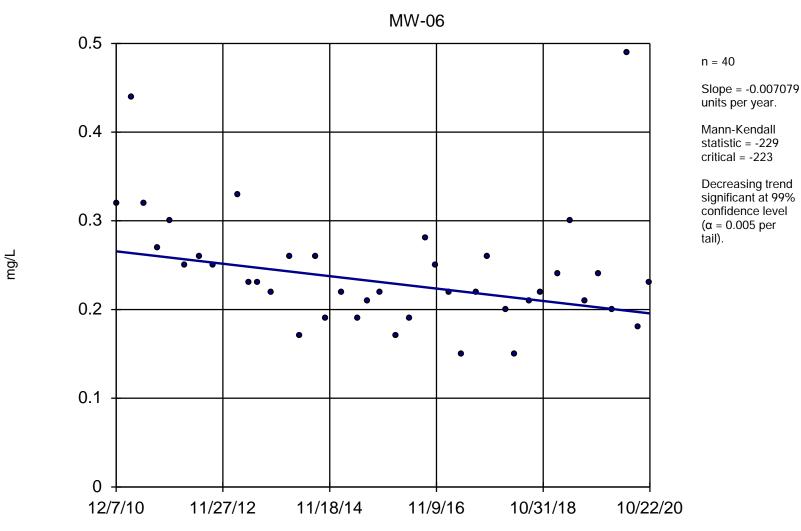
Constituent: Boron, Dissolved Analysis Run 4/2/2021 11:01 AM



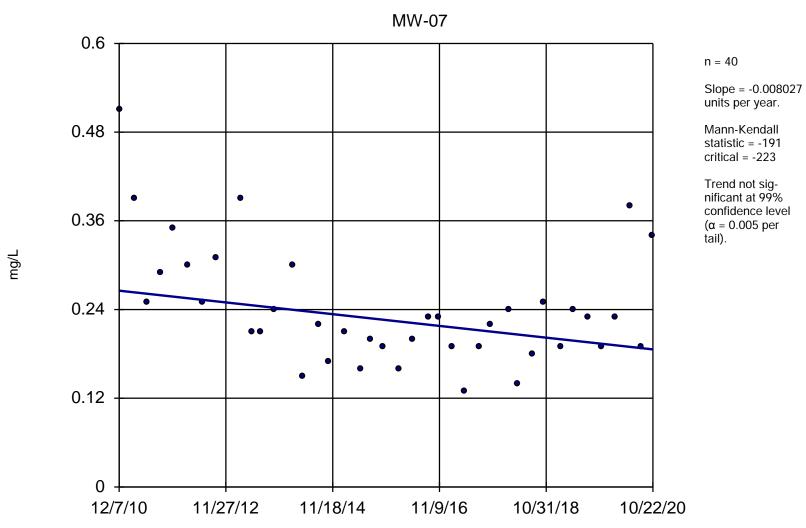


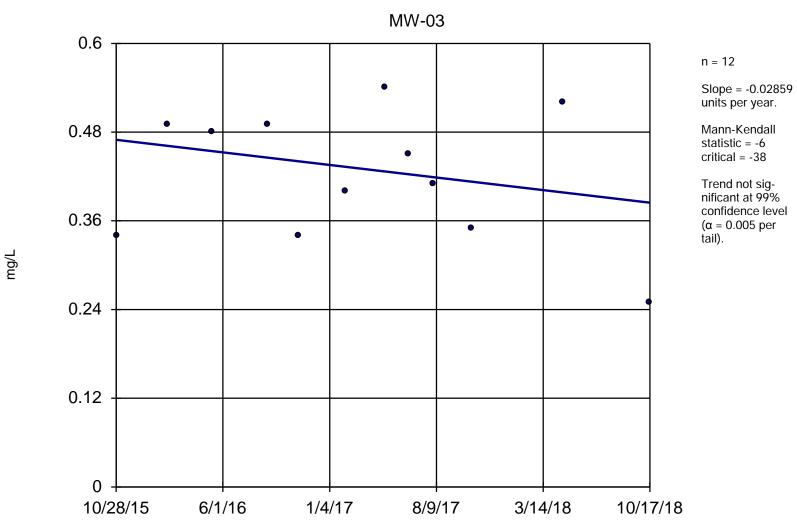
Constituent: Boron, Dissolved Analysis Run 4/2/2021 11:01 AM
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

MWG13-15 81555



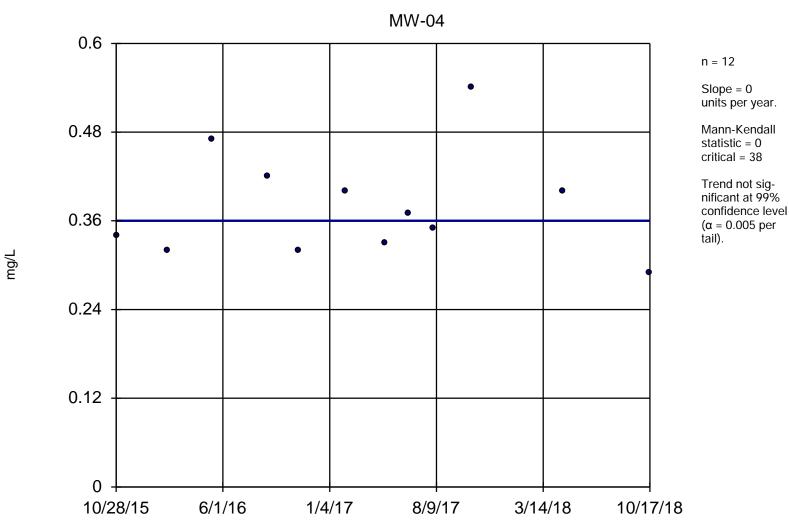
Constituent: Boron, Dissolved Analysis Run 4/2/2021 11:01 AM
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database





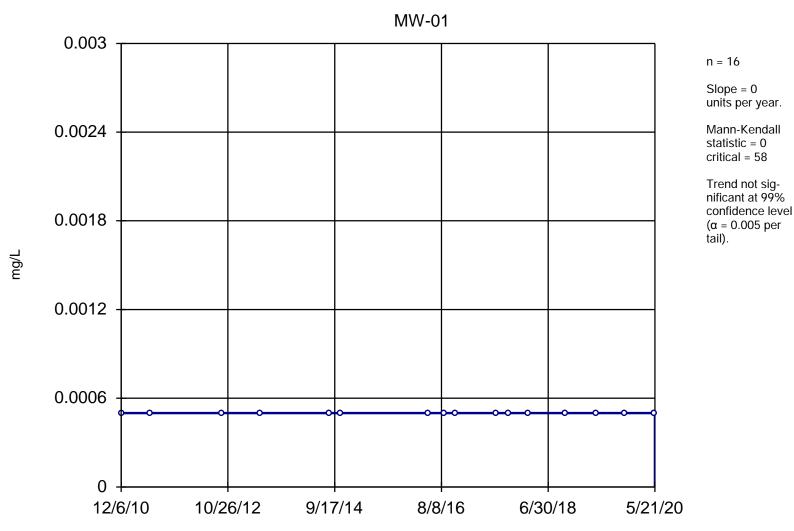
Constituent: Boron, Total Analysis Run 4/2/2021 11:01 AM

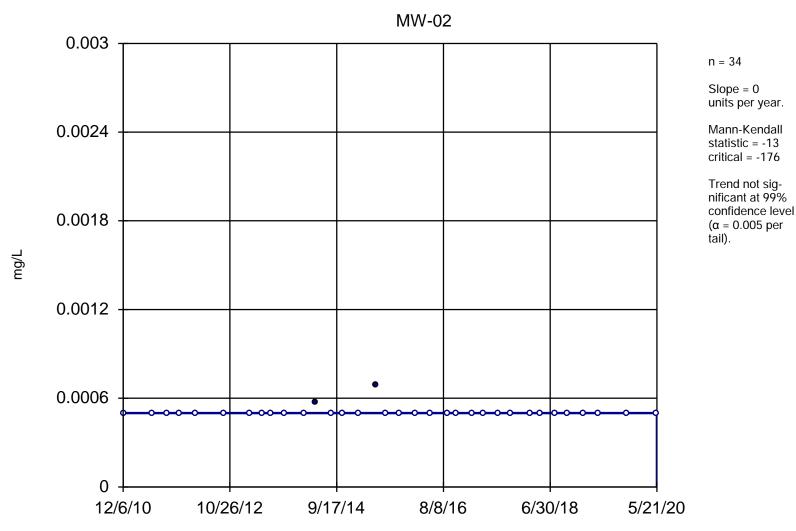
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

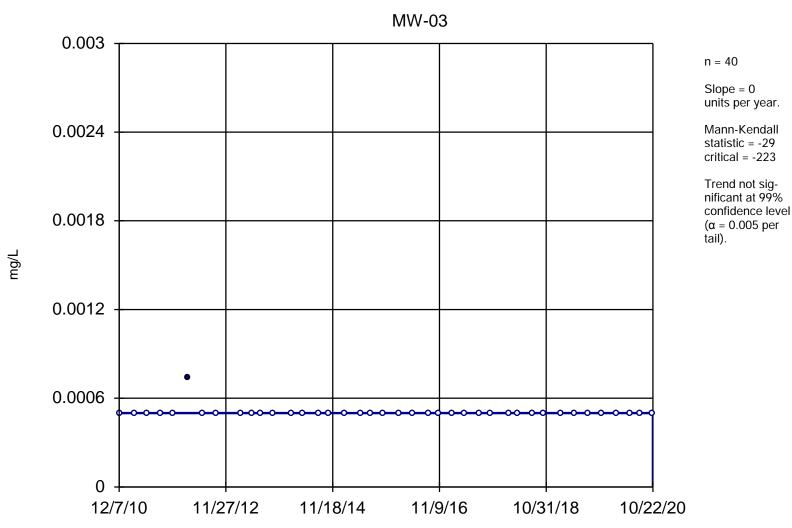


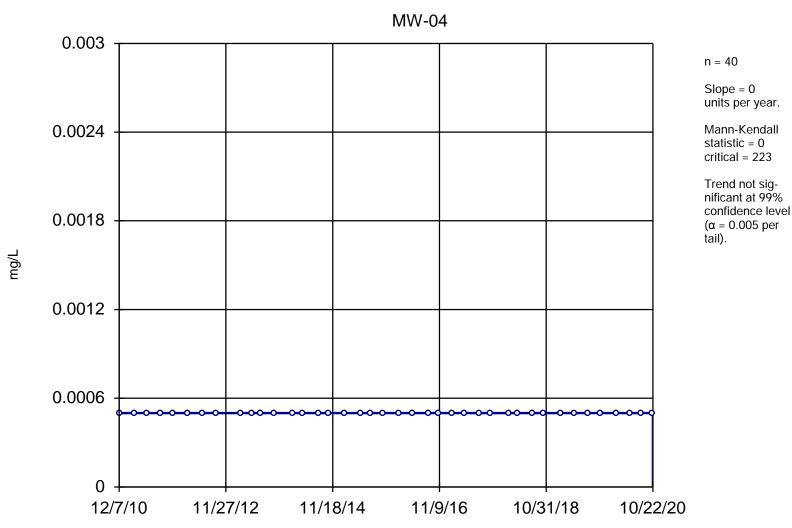
Constituent: Boron, Total Analysis Run 4/2/2021 11:01 AM

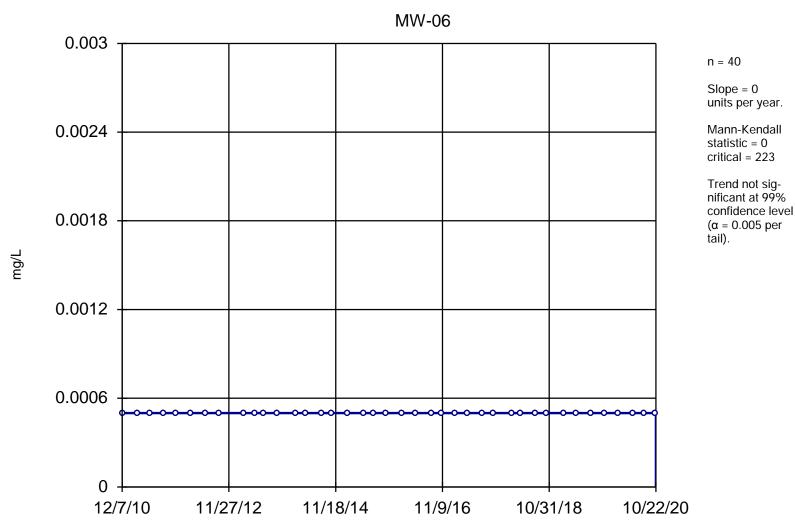
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

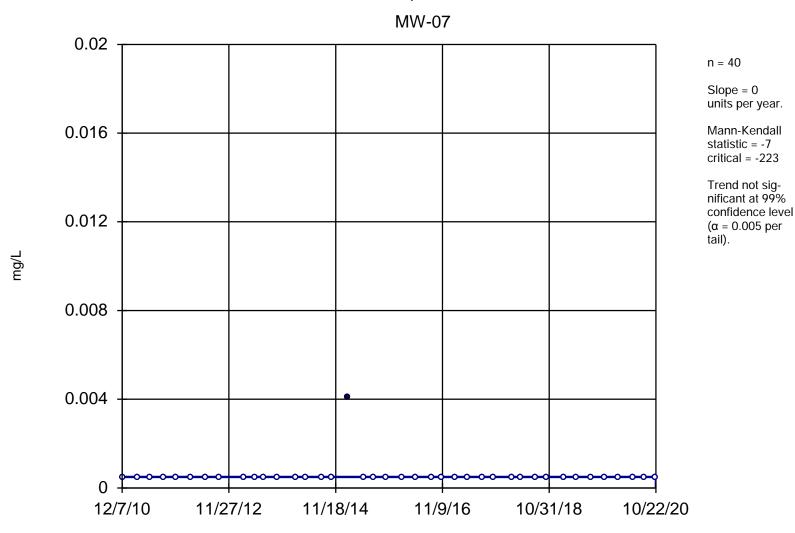


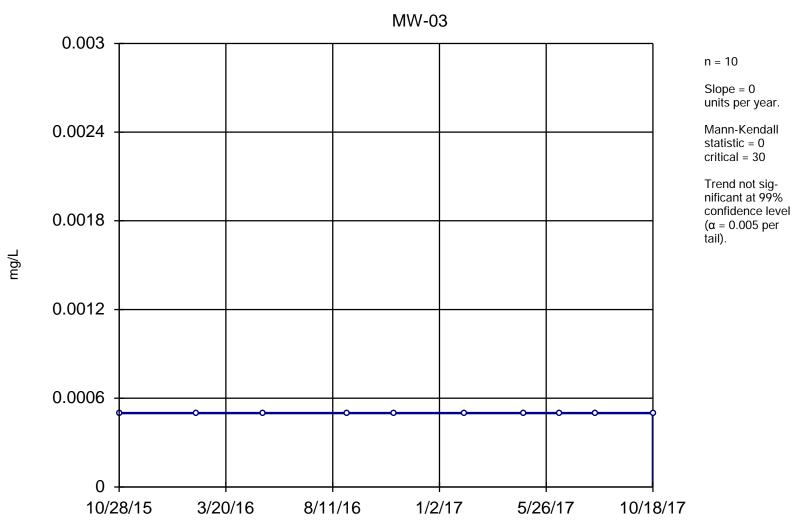


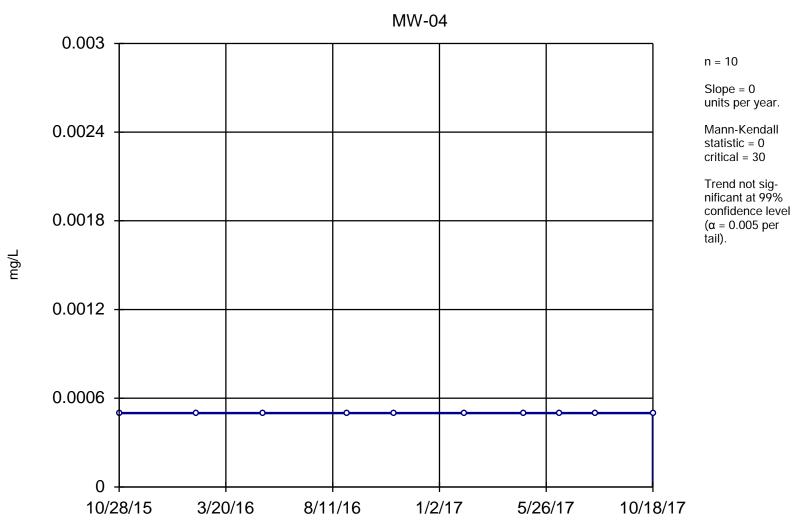


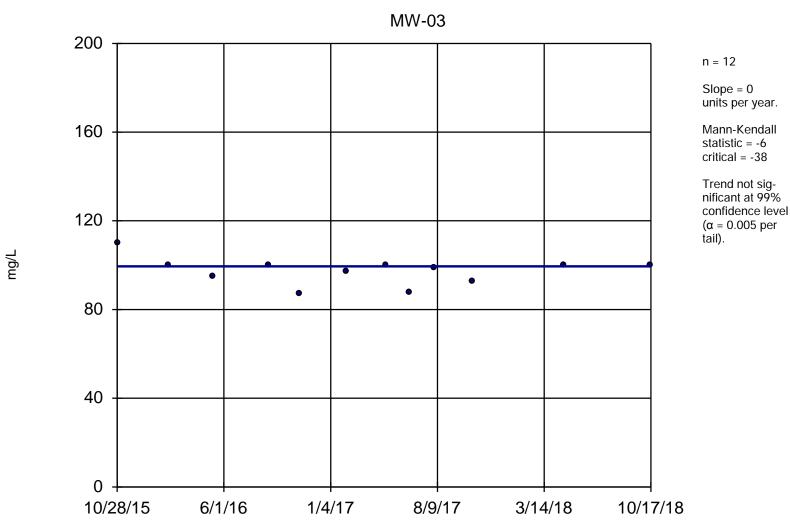




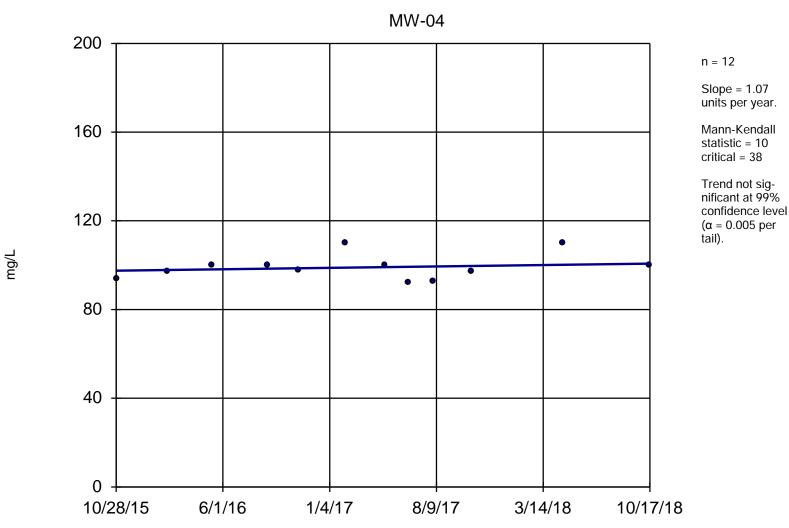




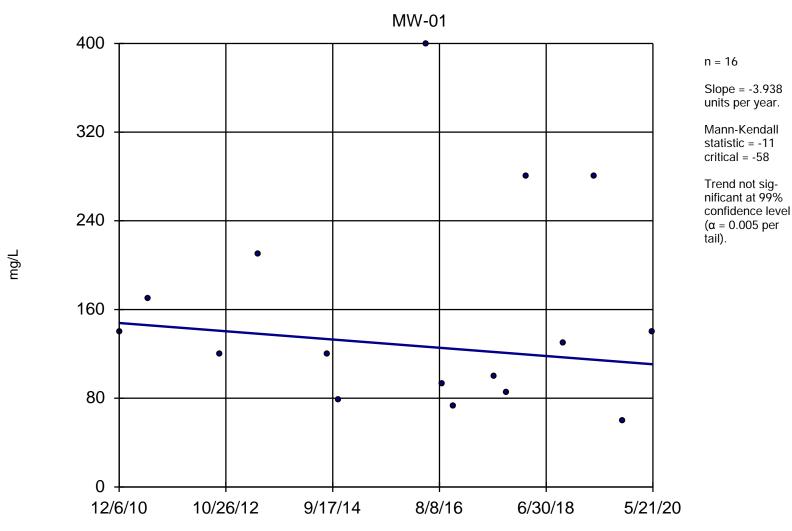




Constituent: Calcium, Total Analysis Run 4/2/2021 11:01 AM

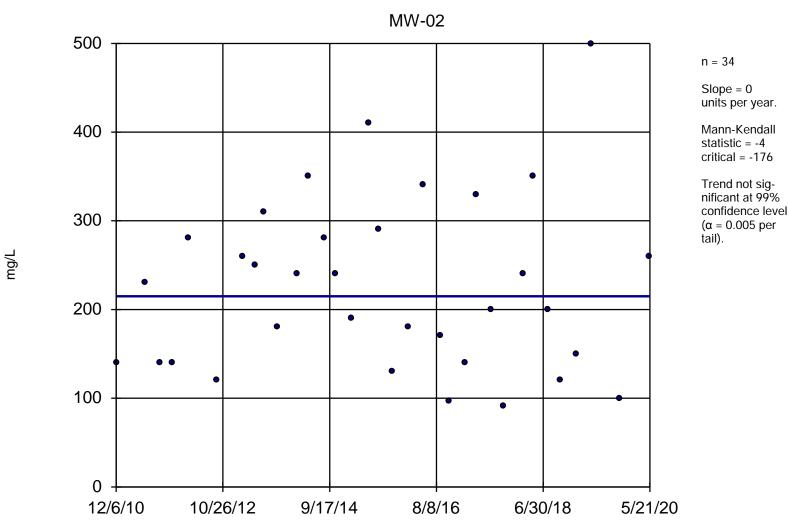


Constituent: Calcium, Total Analysis Run 4/2/2021 11:01 AM



Constituent: Chloride Analysis Run 4/2/2021 11:01 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

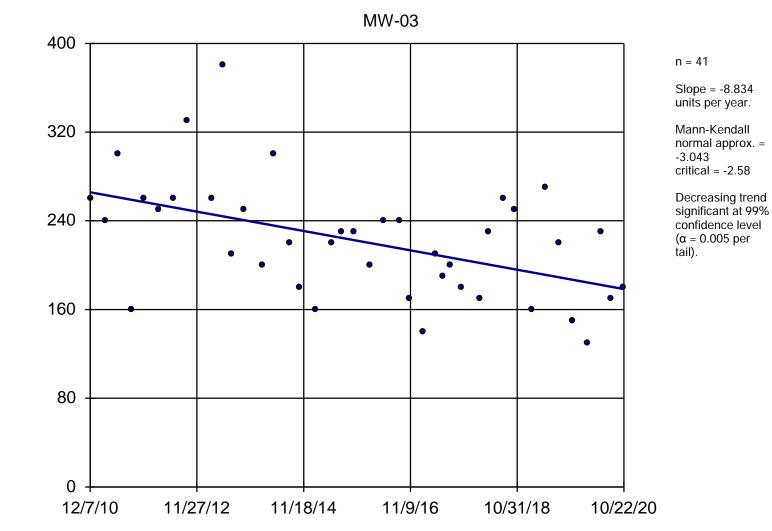


Constituent: Chloride Analysis Run 4/2/2021 11:01 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

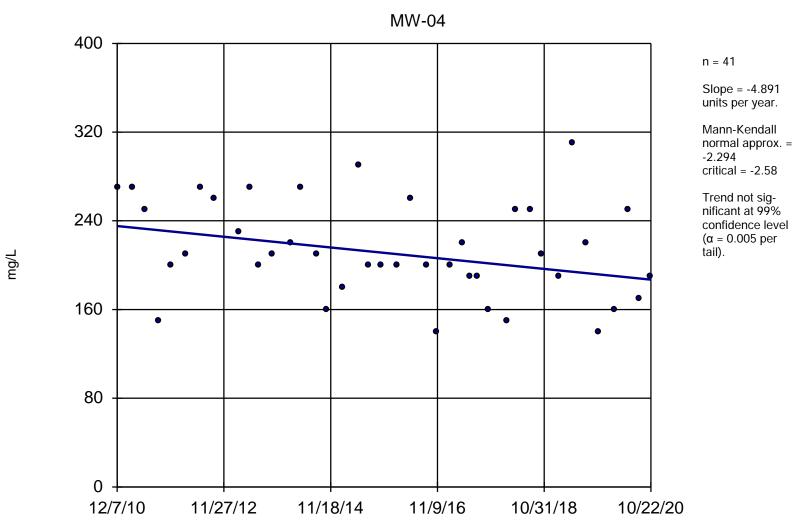
mg/L

## Sen's Slope Estimator



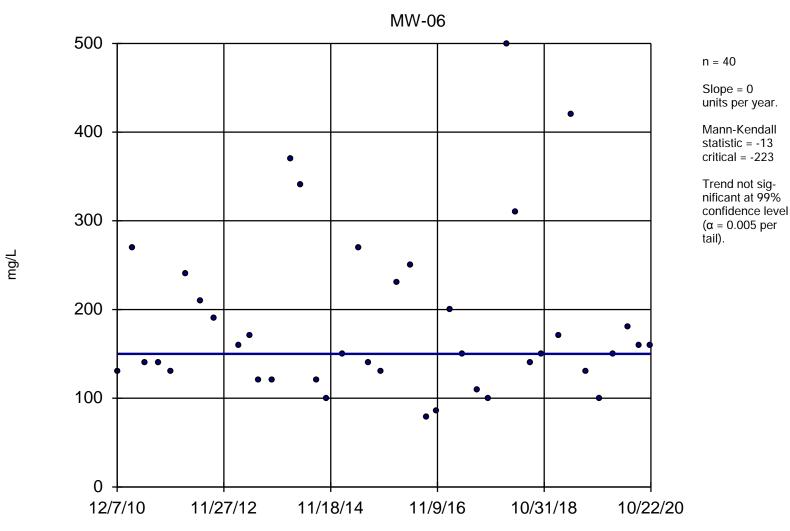
Constituent: Chloride Analysis Run 4/2/2021 11:01 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



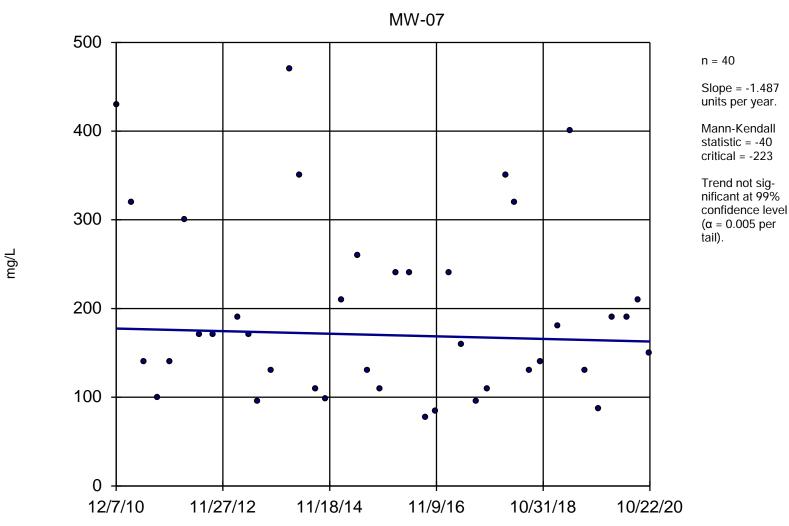
Constituent: Chloride Analysis Run 4/2/2021 11:01 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



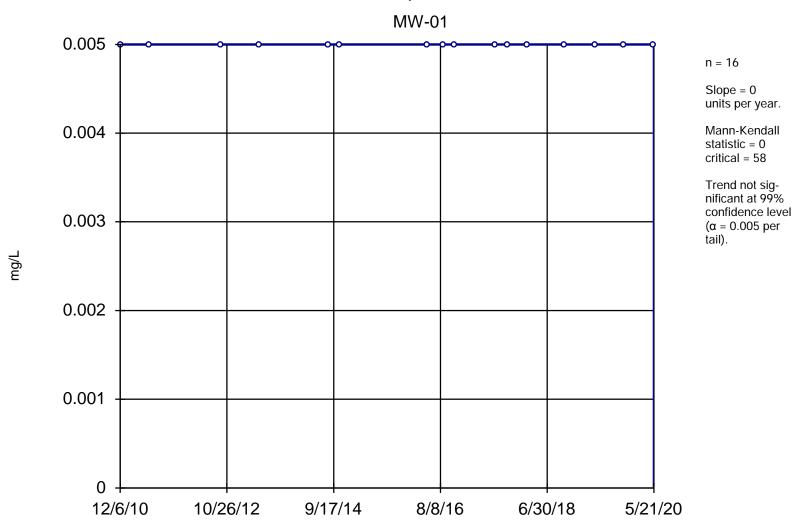
Constituent: Chloride Analysis Run 4/2/2021 11:01 AM

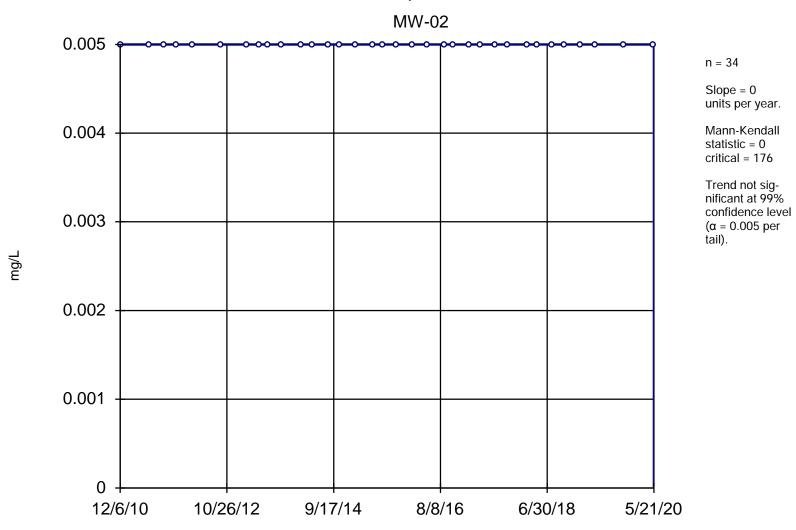
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

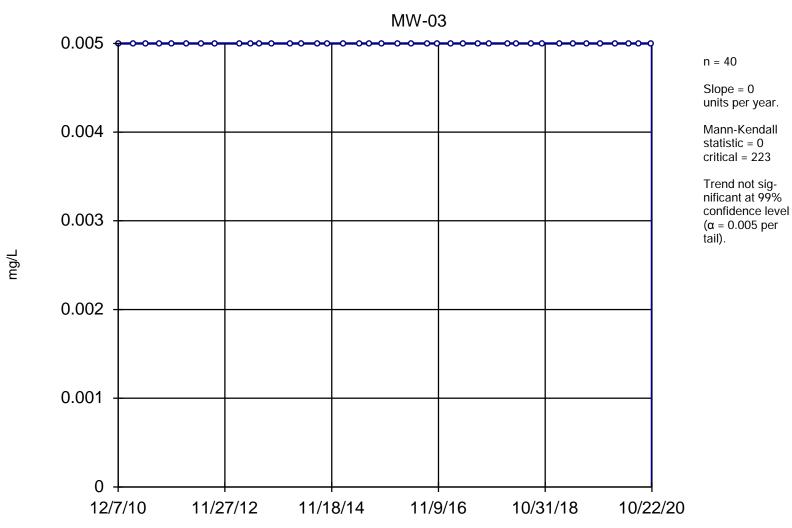


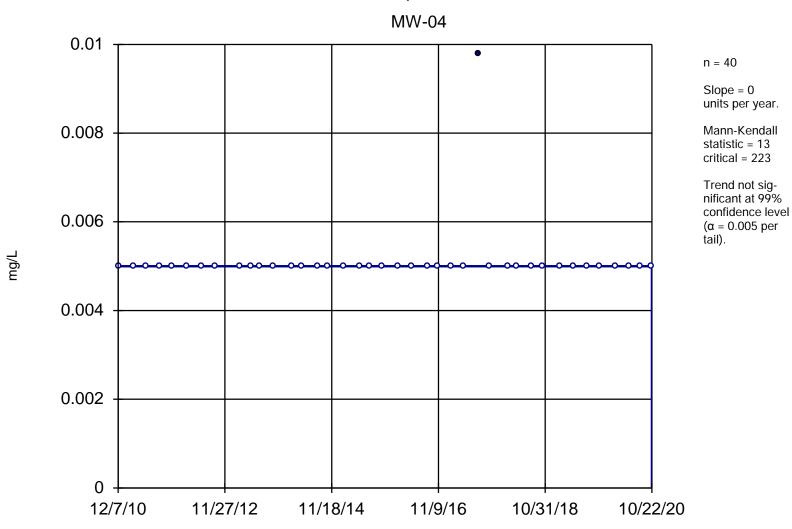
Constituent: Chloride Analysis Run 4/2/2021 11:01 AM

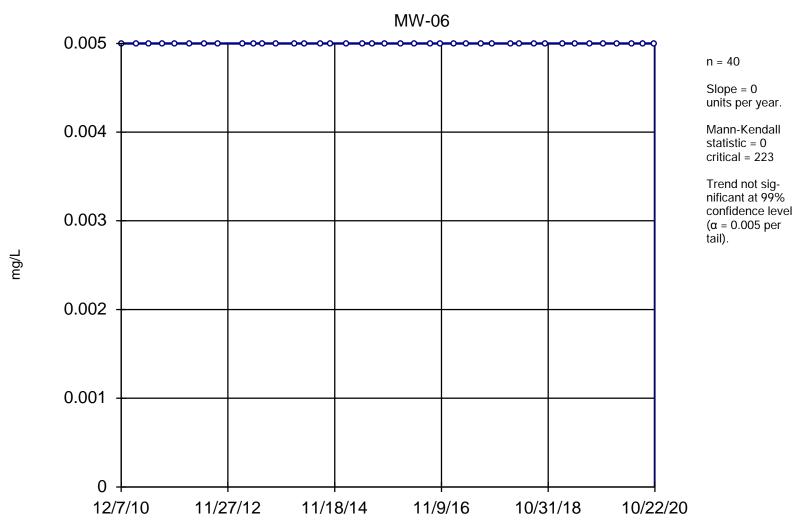
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

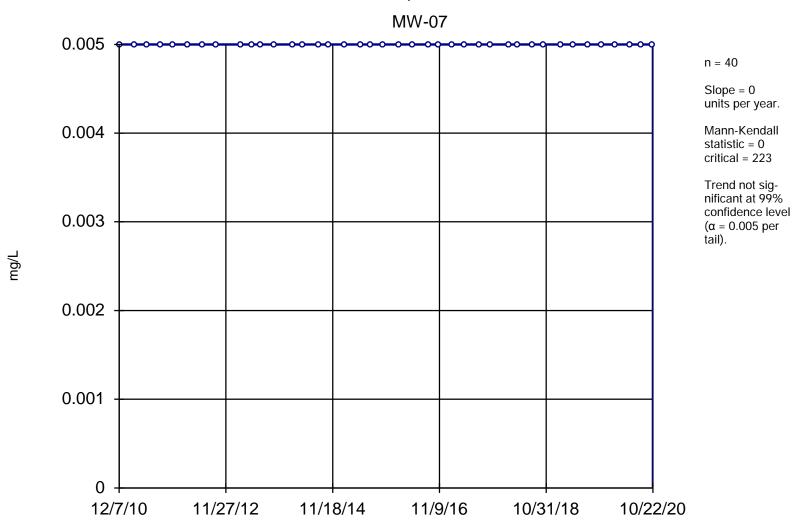


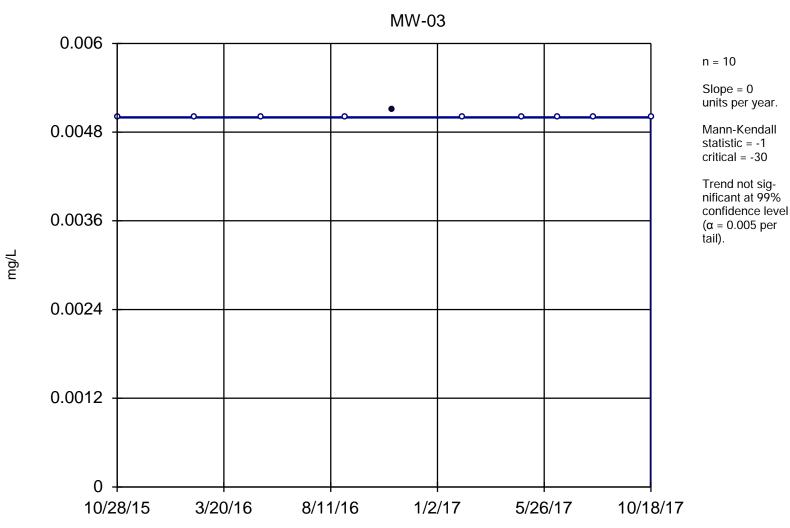


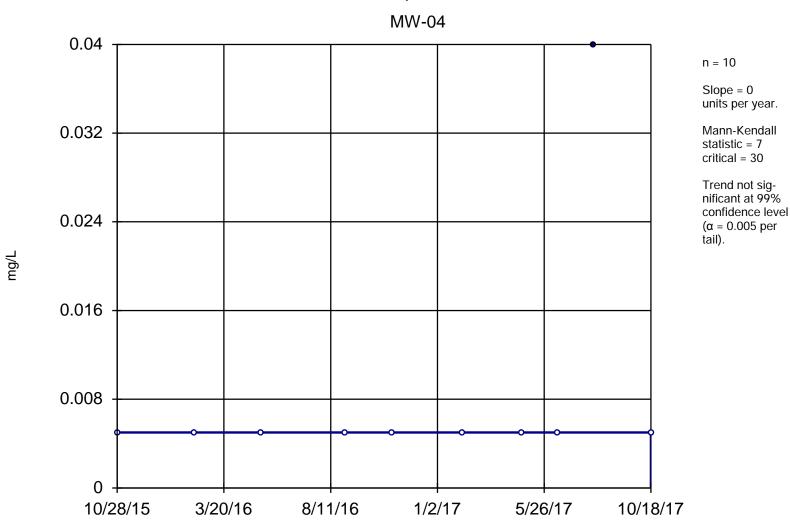




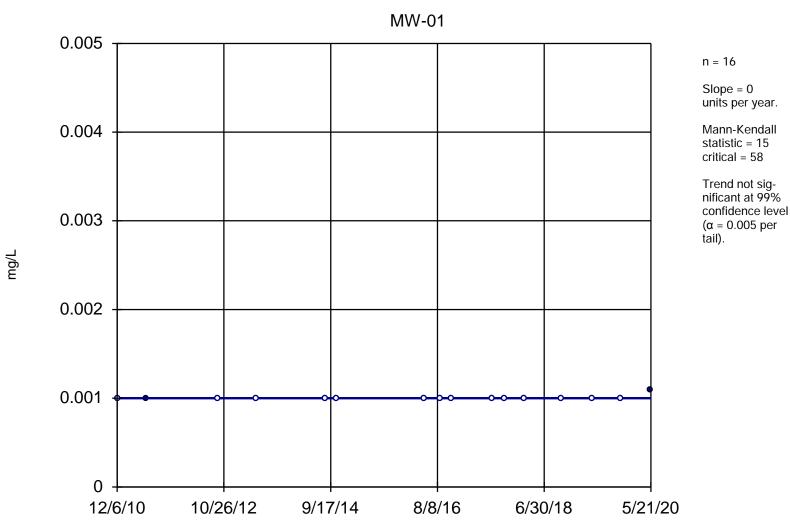




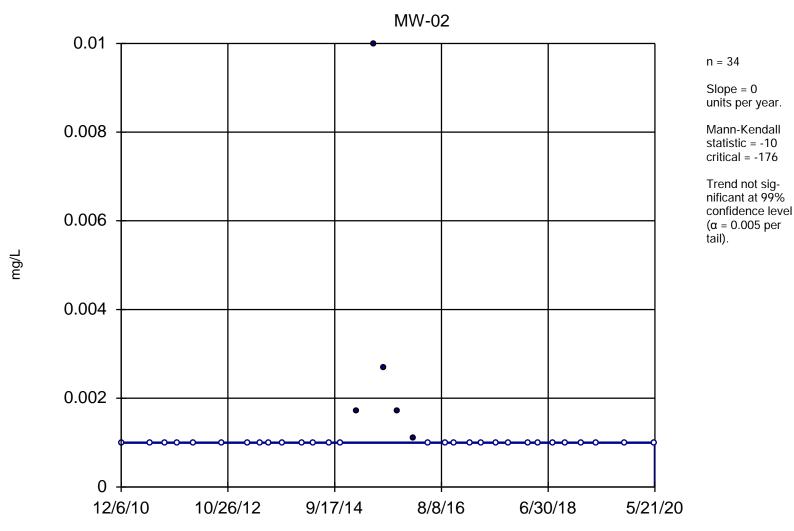




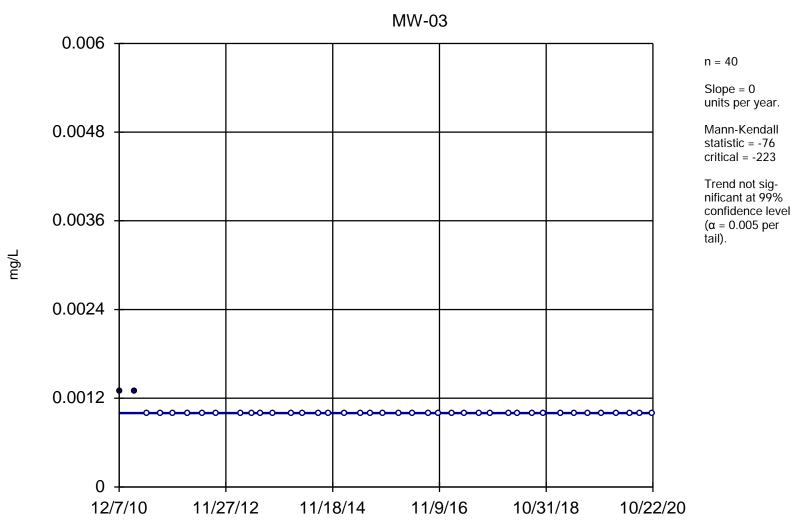
Constituent: Chromium, Total Analysis Run 4/2/2021 11:01 AM



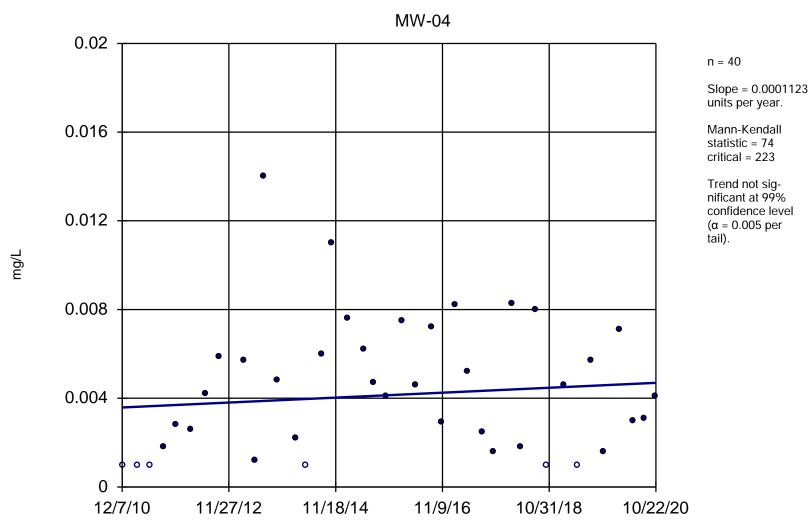
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:01 AM



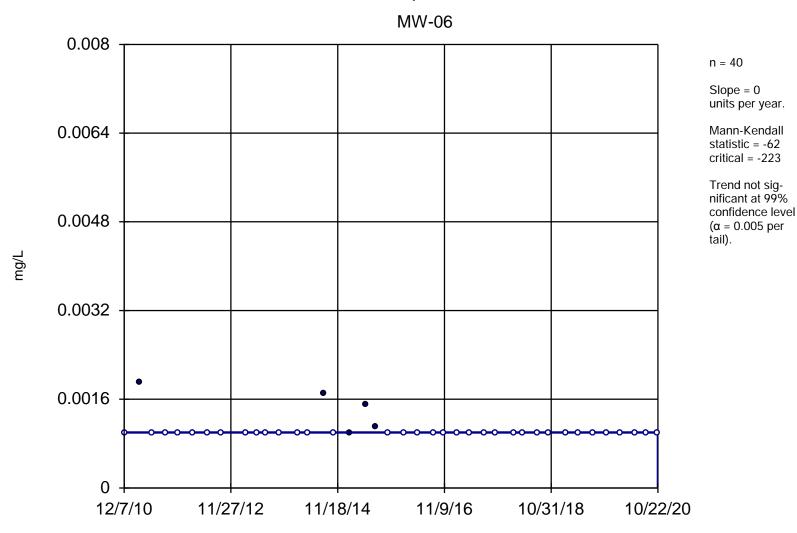
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:01 AM



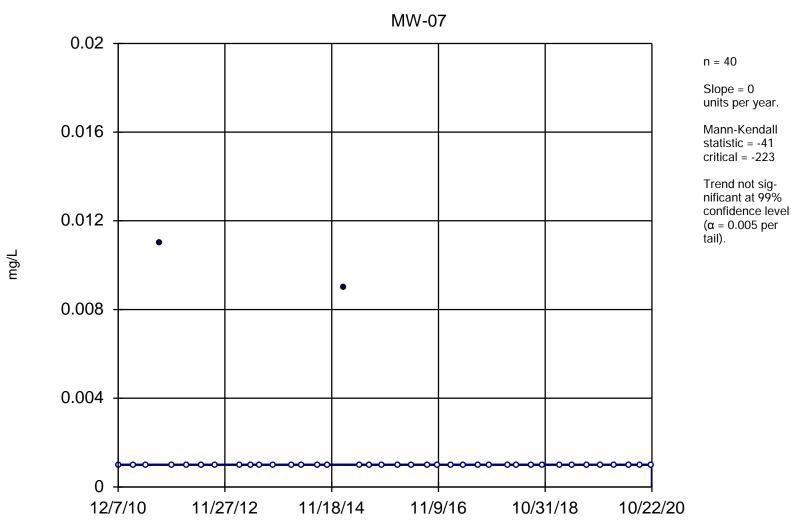
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:01 AM



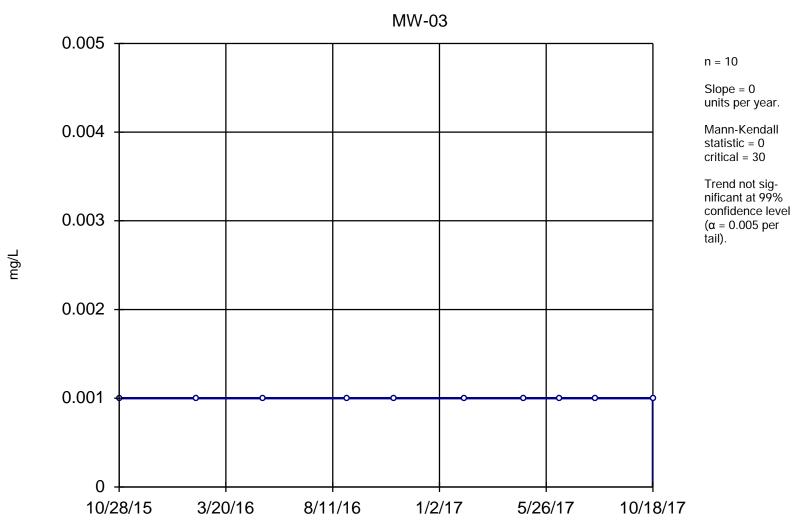
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:01 AM



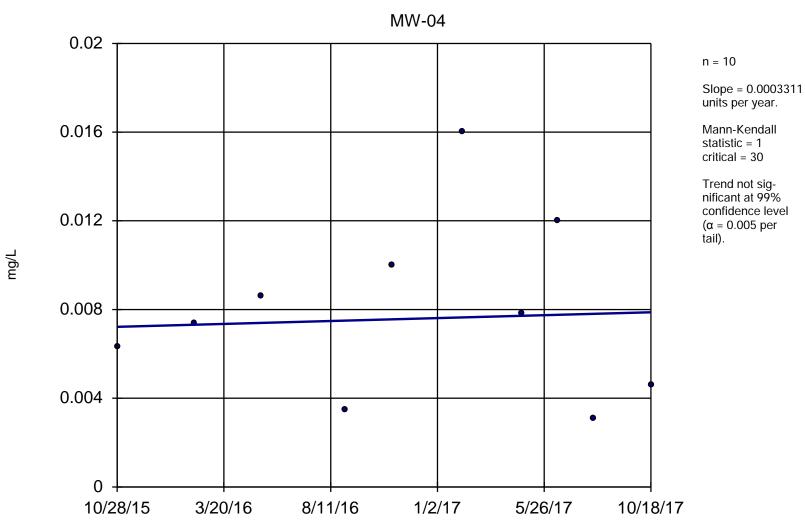
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:01 AM



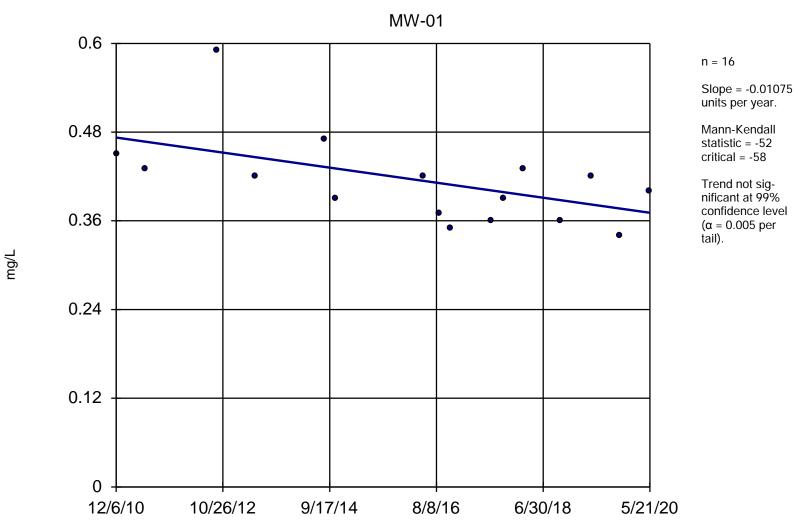
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:01 AM



Constituent: Cobalt, Total Analysis Run 4/2/2021 11:02 AM

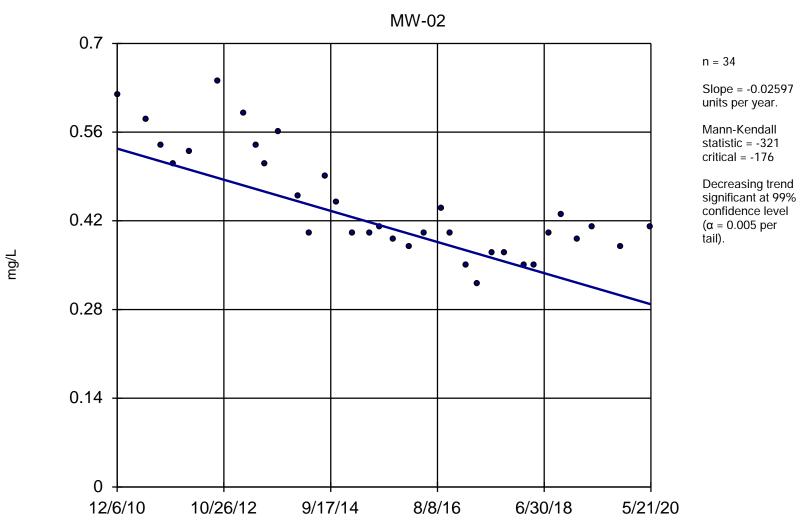


Constituent: Cobalt, Total Analysis Run 4/2/2021 11:02 AM



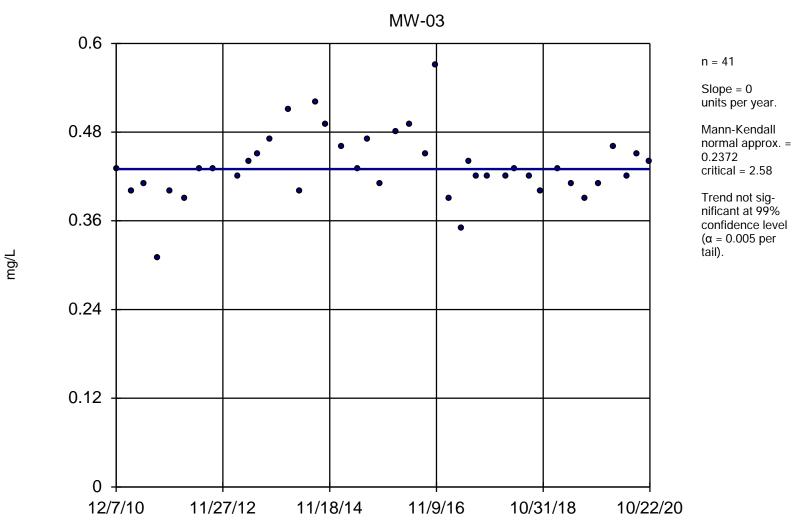
Constituent: Fluoride Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



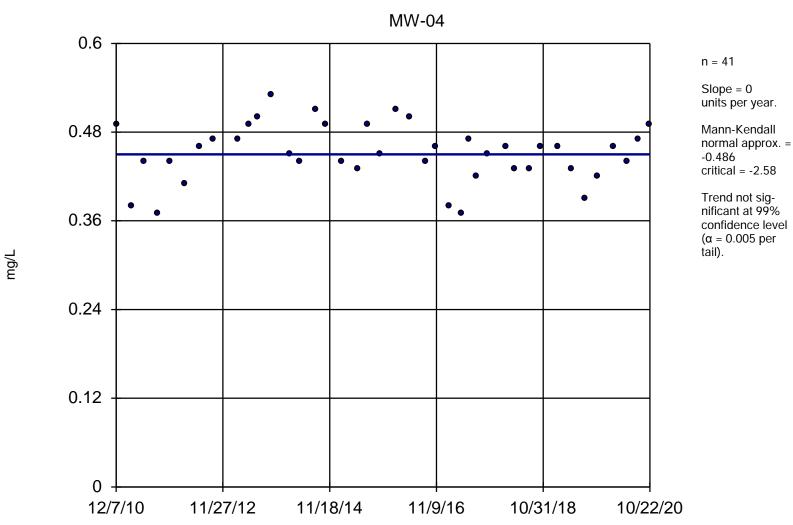
Constituent: Fluoride Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



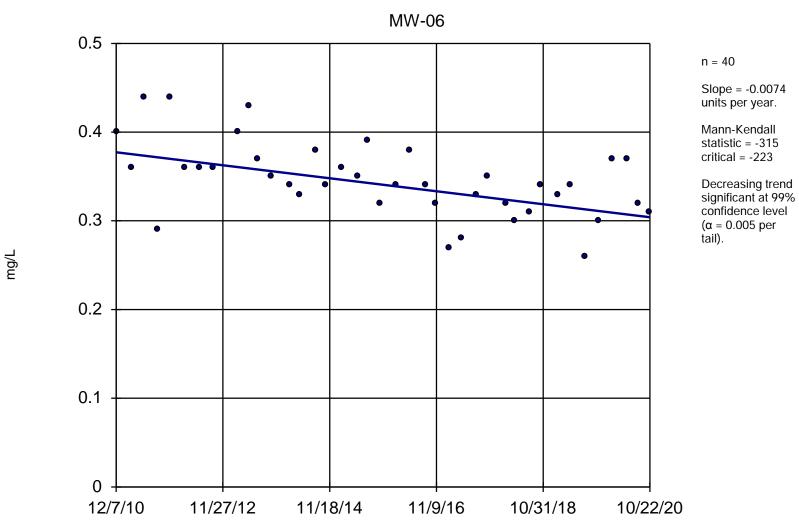
Constituent: Fluoride Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



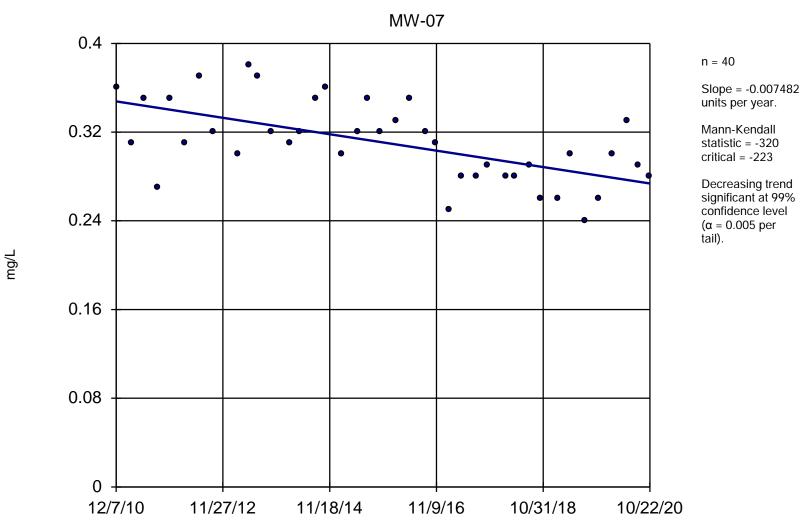
Constituent: Fluoride Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



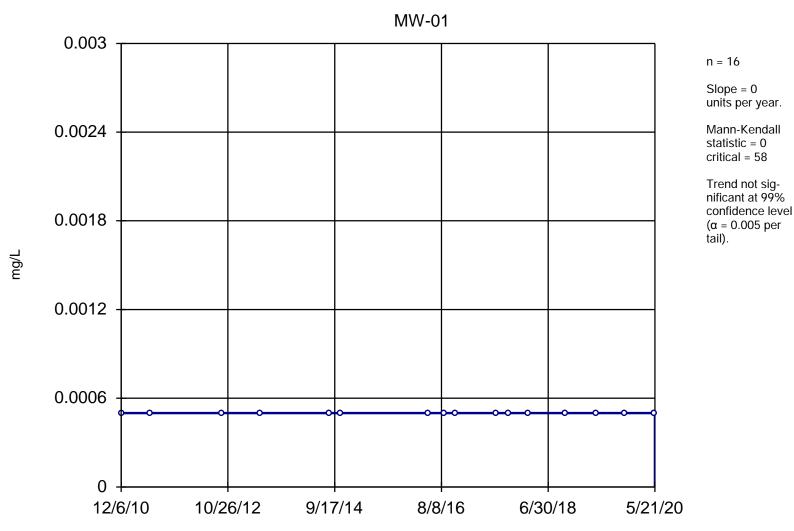
Constituent: Fluoride Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

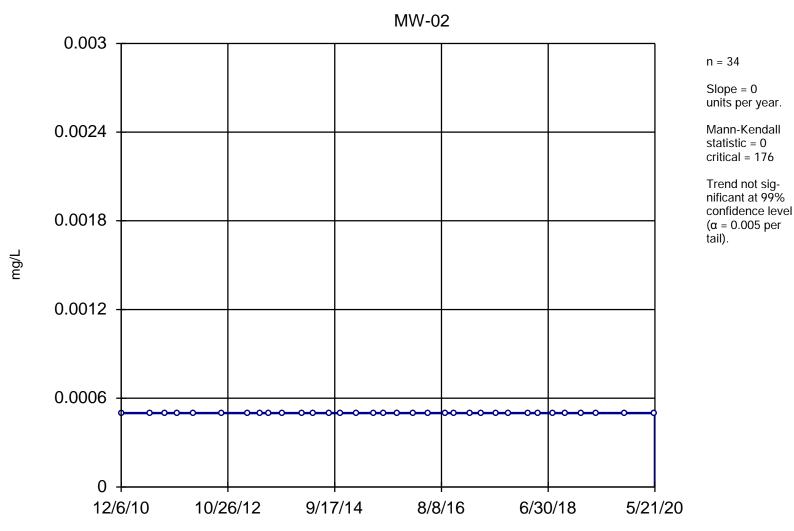


Constituent: Fluoride Analysis Run 4/2/2021 11:02 AM

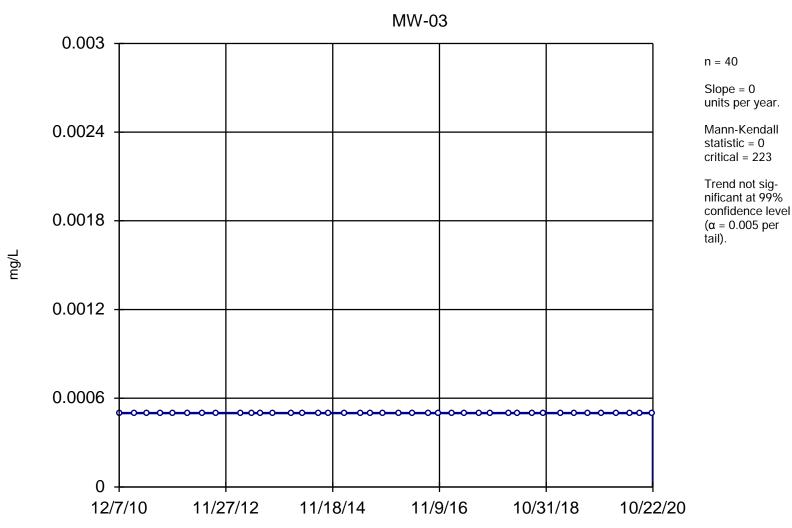
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



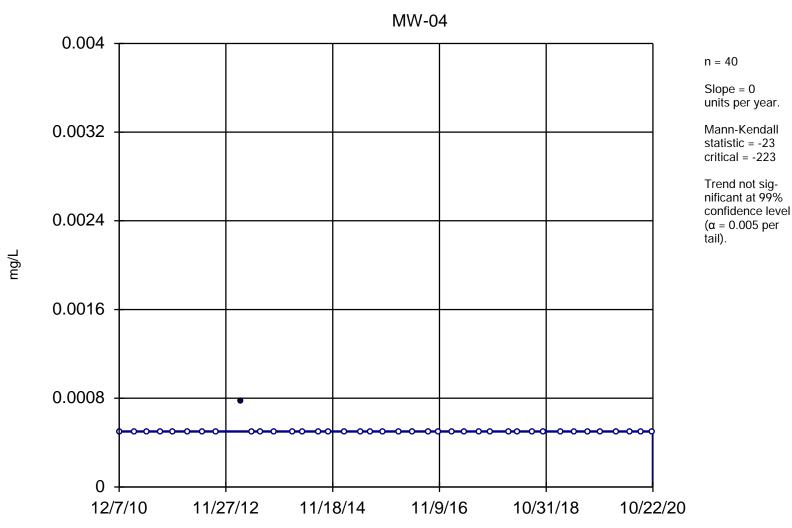
Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:02 AM



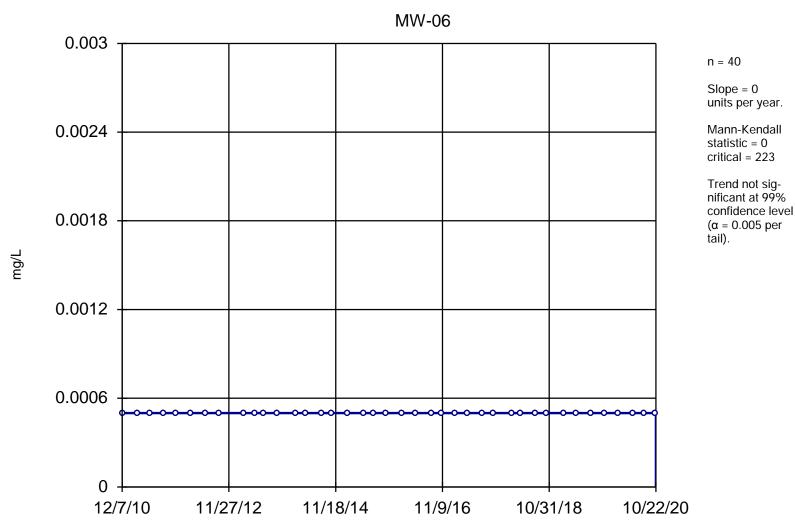
Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:02 AM



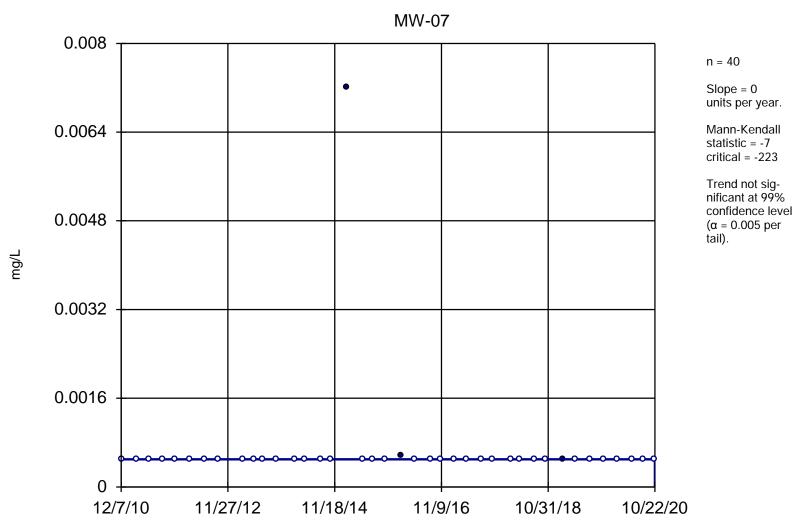
Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:02 AM



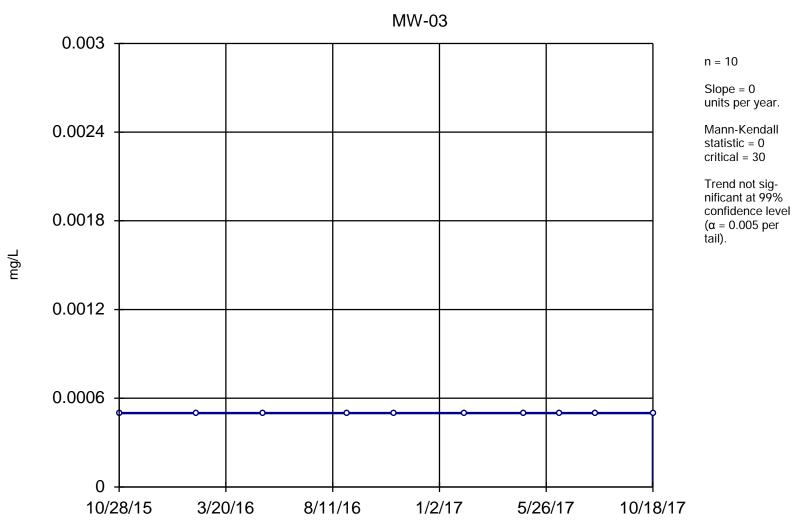
Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:02 AM



Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:02 AM

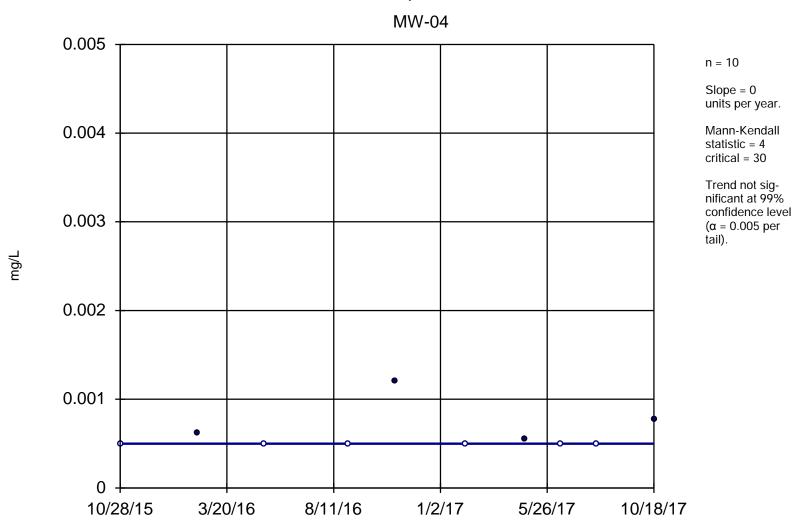


Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:02 AM



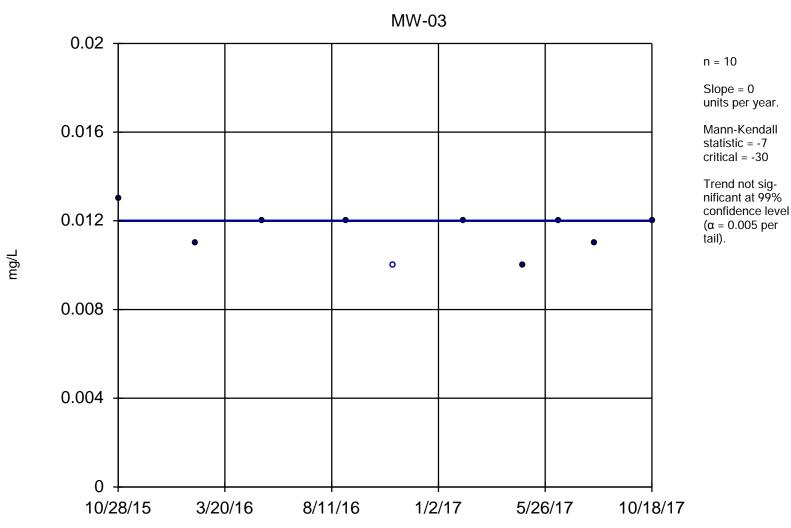
Constituent: Lead, Total Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

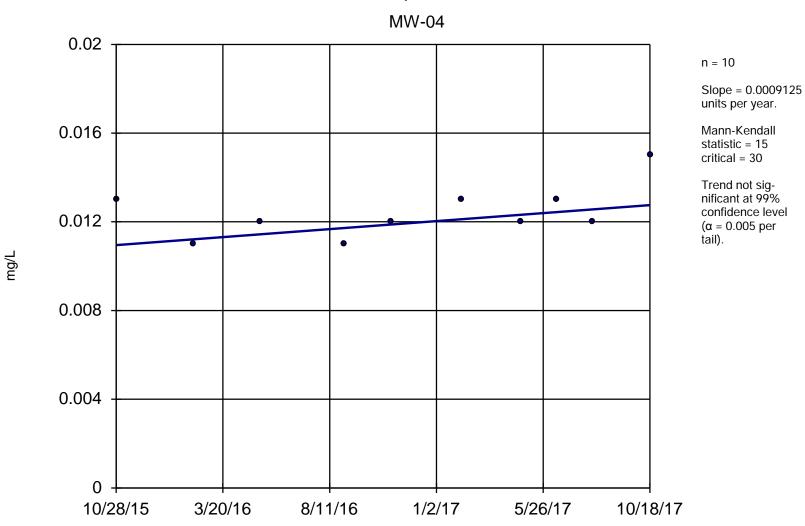


Constituent: Lead, Total Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

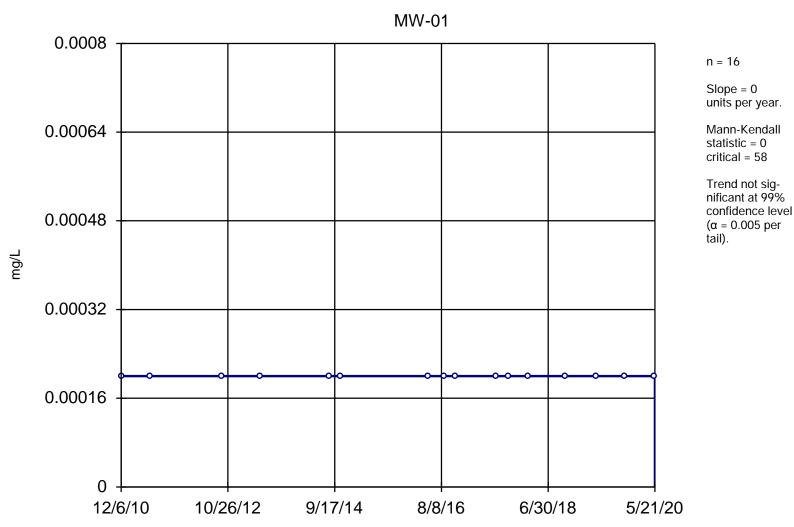


Constituent: Lithium, Total Analysis Run 4/2/2021 11:02 AM

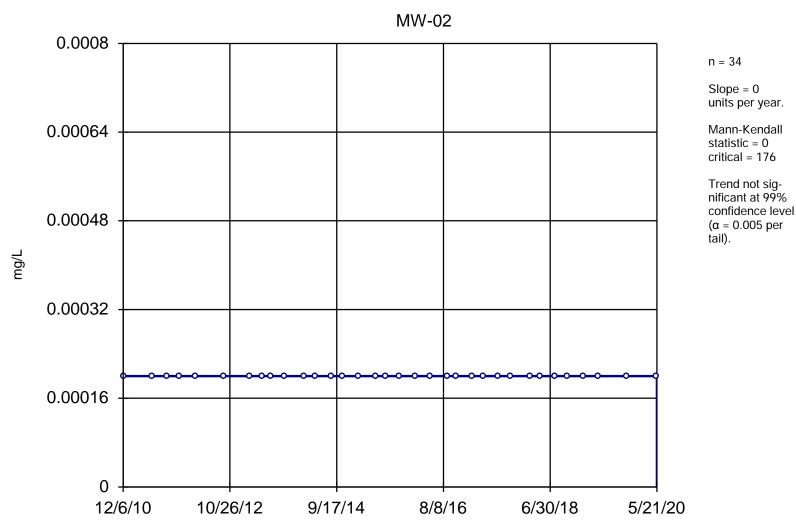


Constituent: Lithium, Total Analysis Run 4/2/2021 11:02 AM

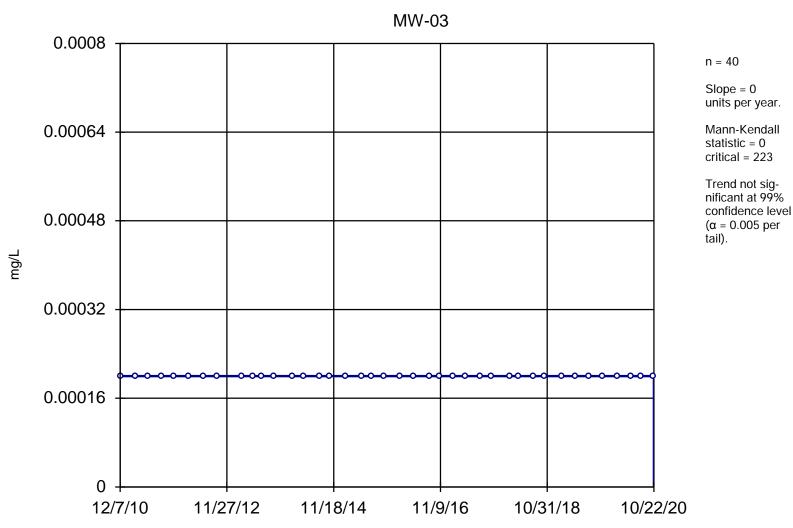
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



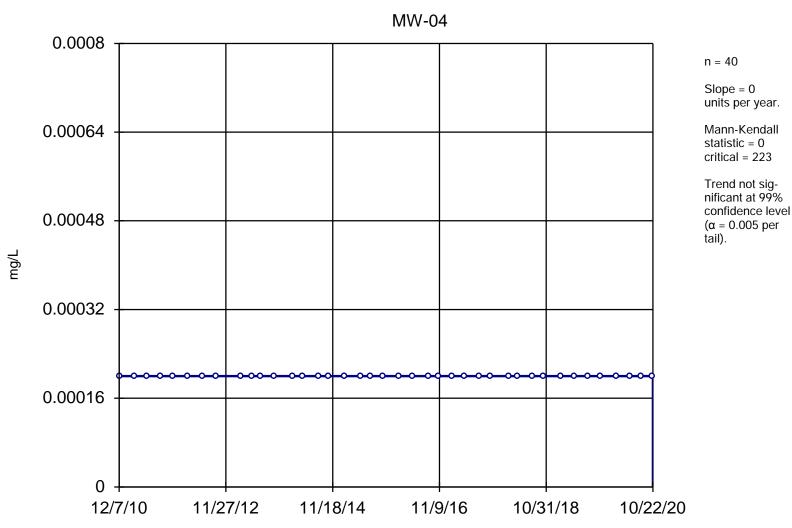
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:02 AM



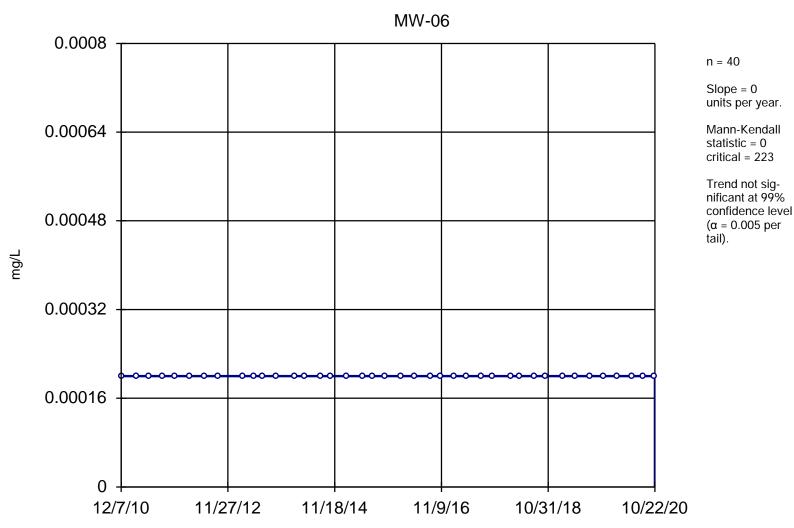
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:02 AM



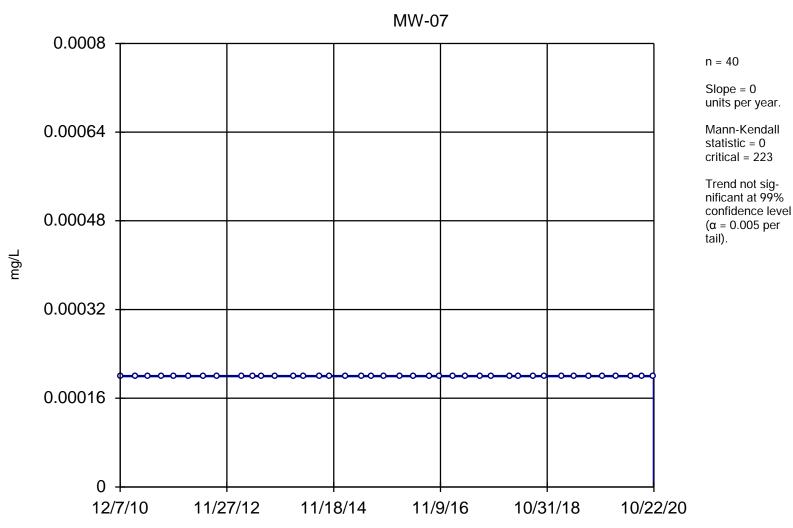
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:02 AM



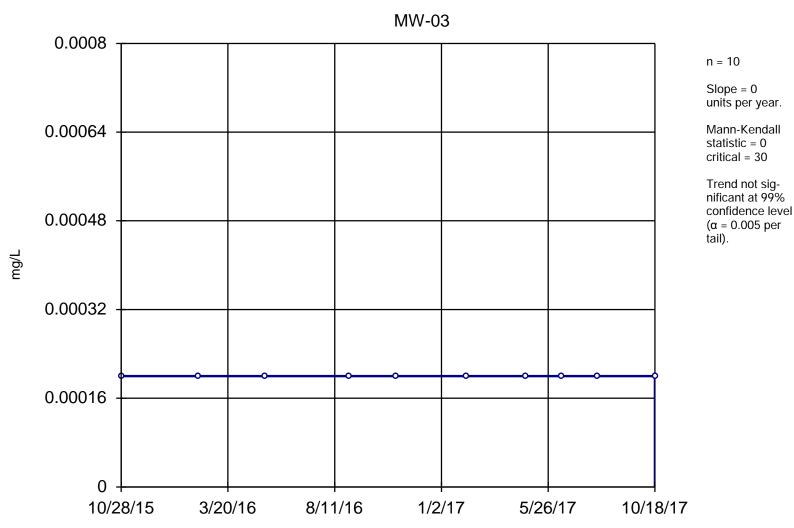
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:02 AM



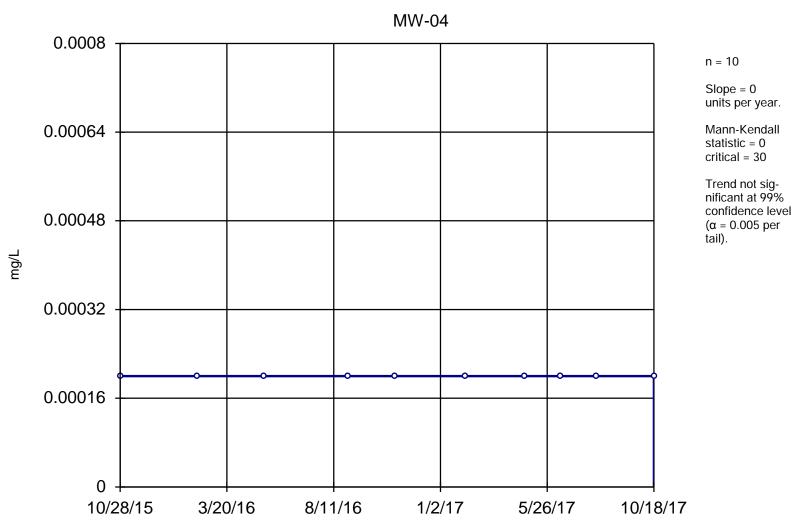
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:02 AM



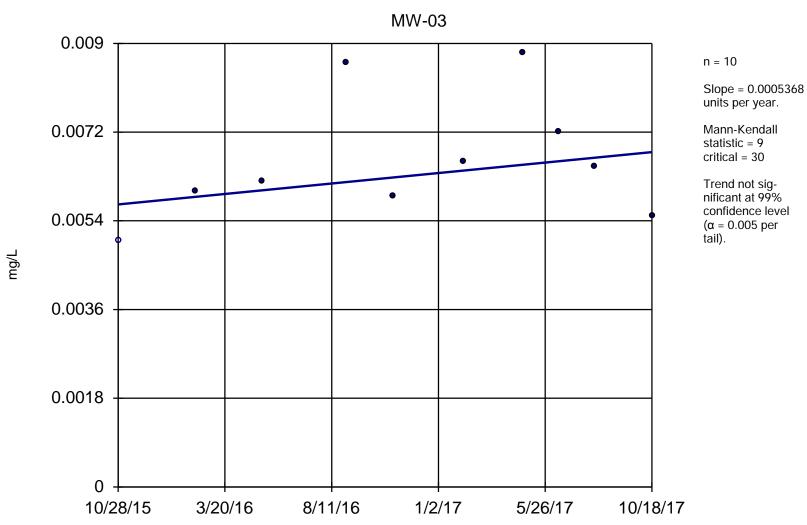
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:02 AM



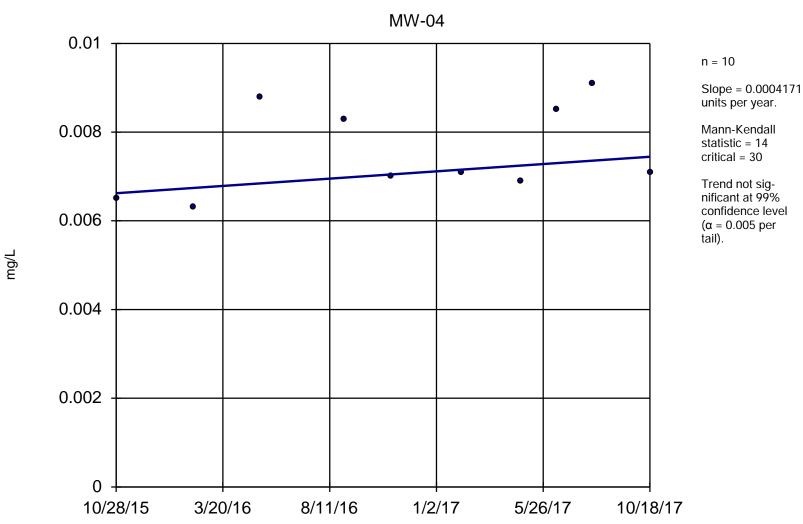
Constituent: Mercury, Total Analysis Run 4/2/2021 11:02 AM



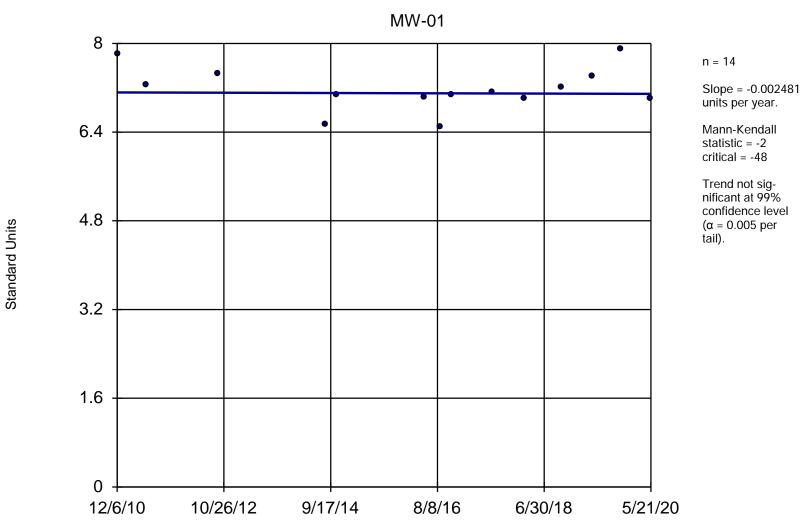
Constituent: Mercury, Total Analysis Run 4/2/2021 11:02 AM



Constituent: Molybdenum, Total Analysis Run 4/2/2021 11:02 AM
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

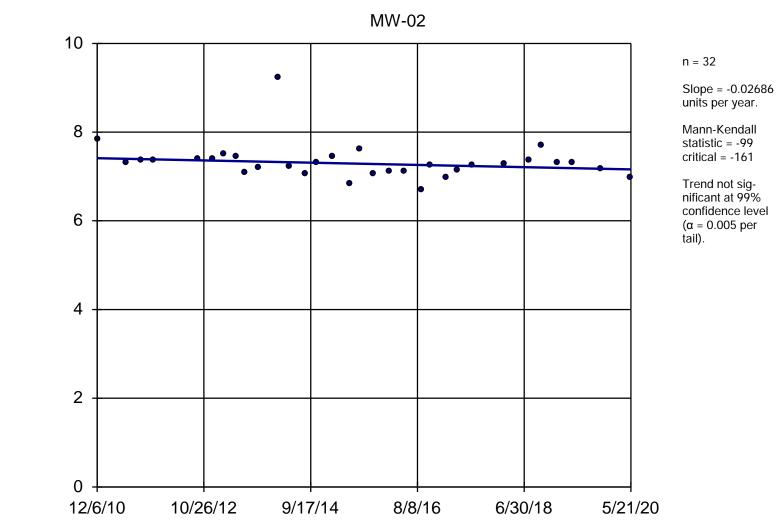


Constituent: Molybdenum, Total Analysis Run 4/2/2021 11:02 AM



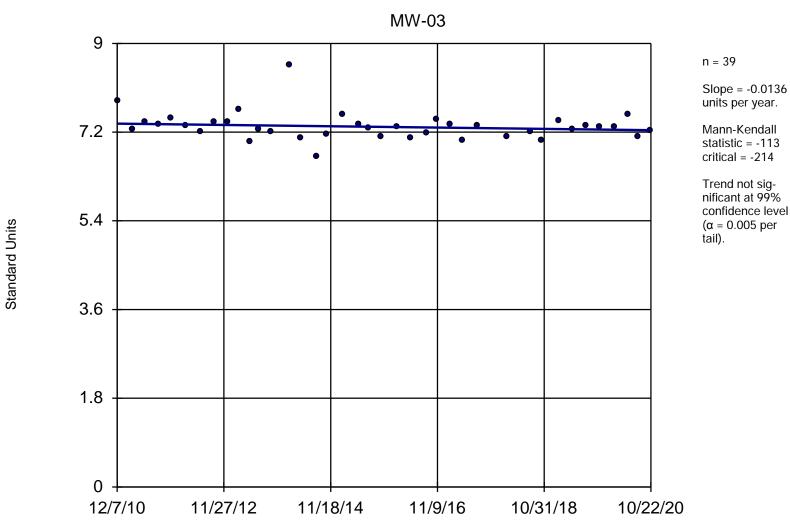
Constituent: pH, Field Analysis Run 4/2/2021 11:02 AM

Standard Units



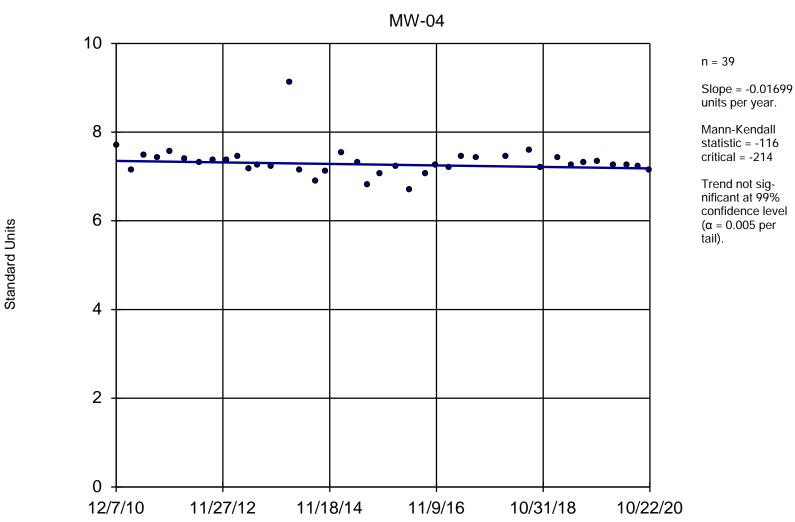
Constituent: pH, Field Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



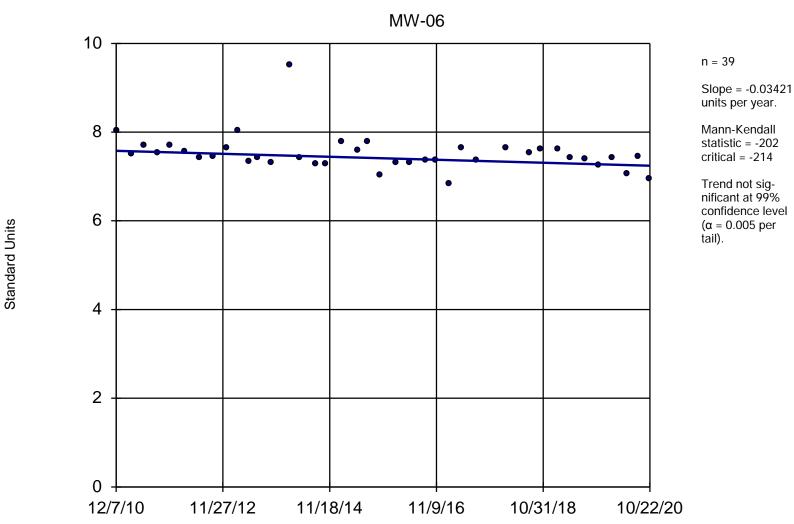
Constituent: pH, Field Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



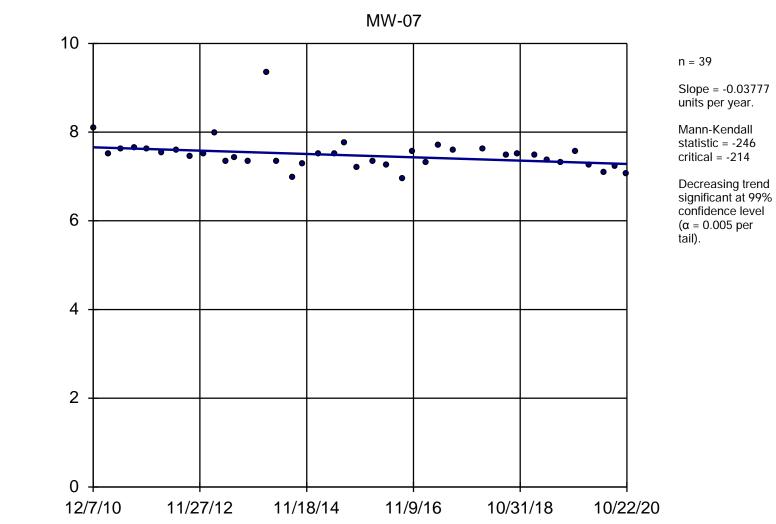
Constituent: pH, Field Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



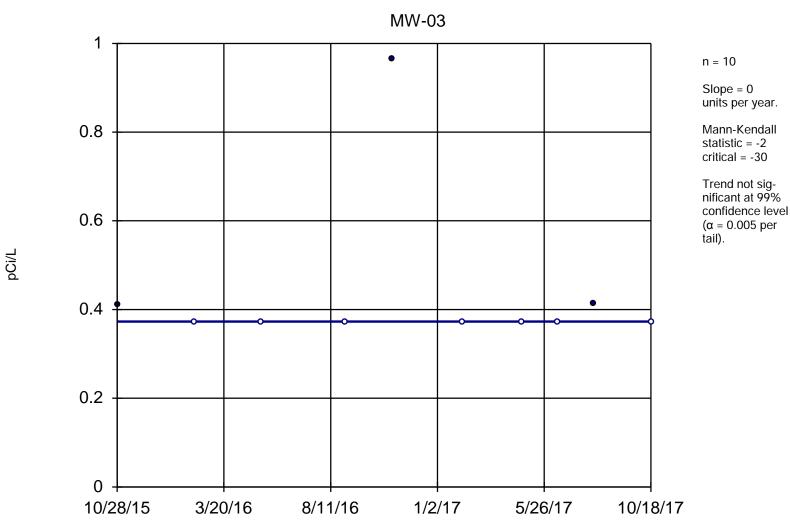
Constituent: pH, Field Analysis Run 4/2/2021 11:02 AM

Standard Units

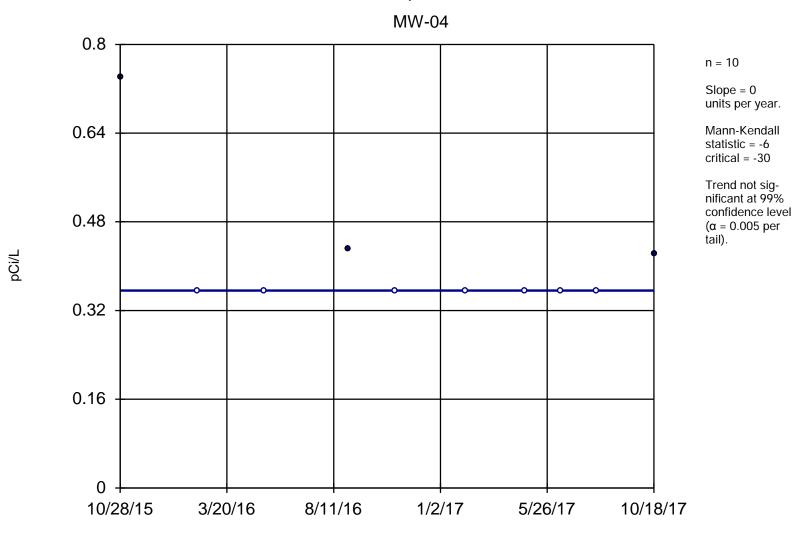


Constituent: pH, Field Analysis Run 4/2/2021 11:02 AM

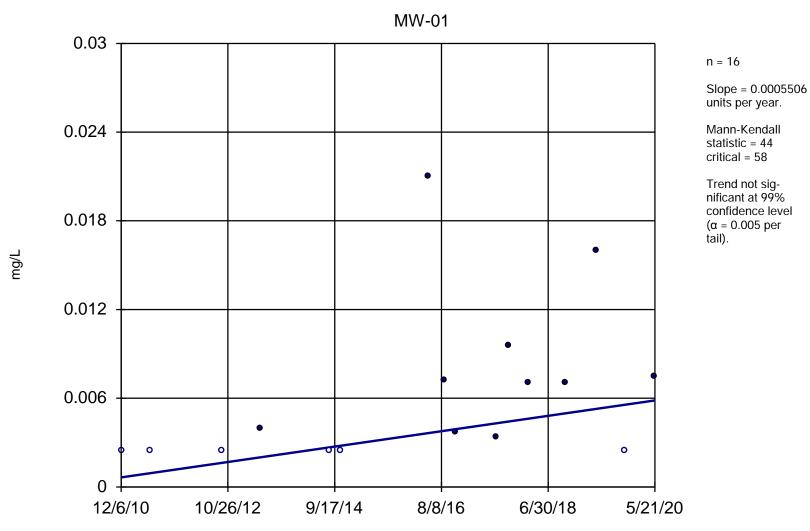
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



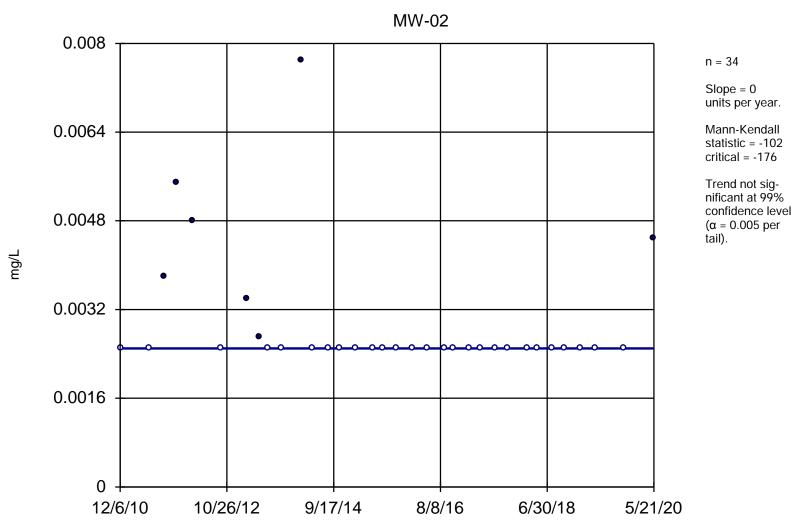
Constituent: Radium 226 + Radium 228, Combined Analysis Run 4/2/2021 11:02 AM Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



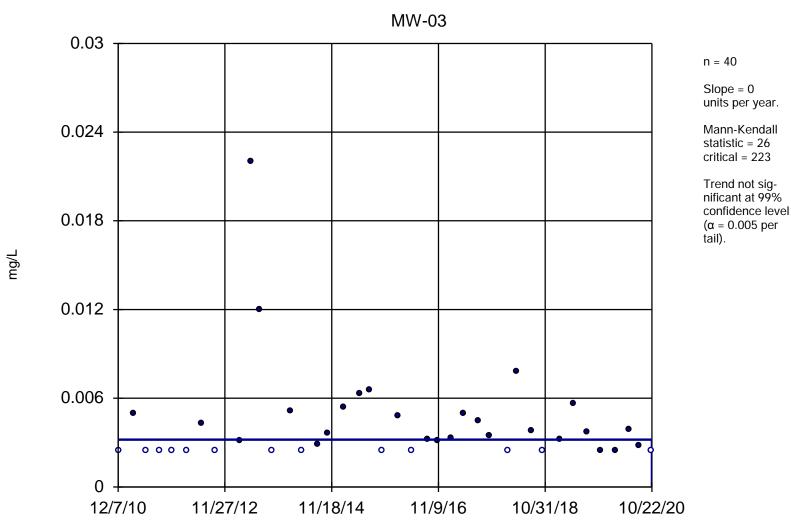
Constituent: Radium 226 + Radium 228, Combined Analysis Run 4/2/2021 11:02 AM Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



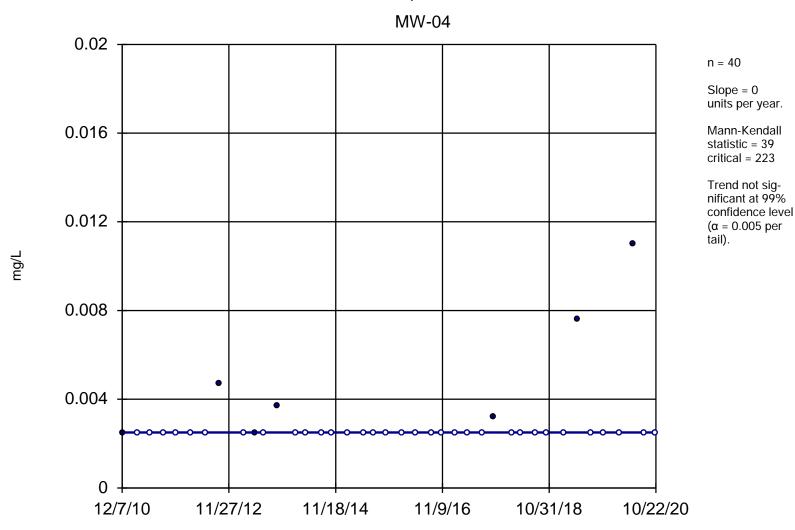
Constituent: Selenium, Dissolved Analysis Run 4/2/2021 11:02 AM
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

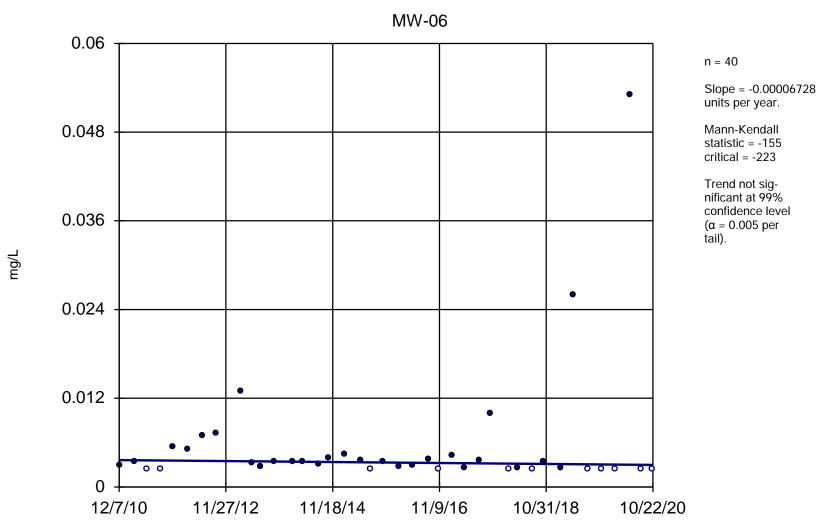


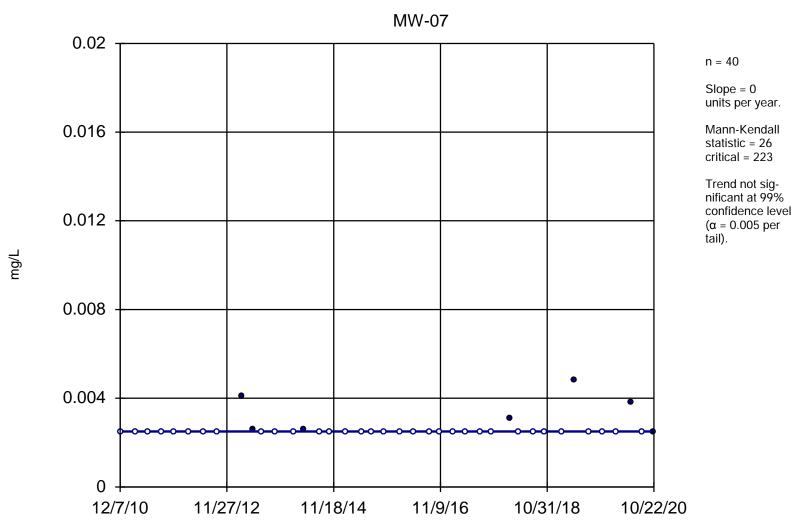
Constituent: Selenium, Dissolved Analysis Run 4/2/2021 11:02 AM
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

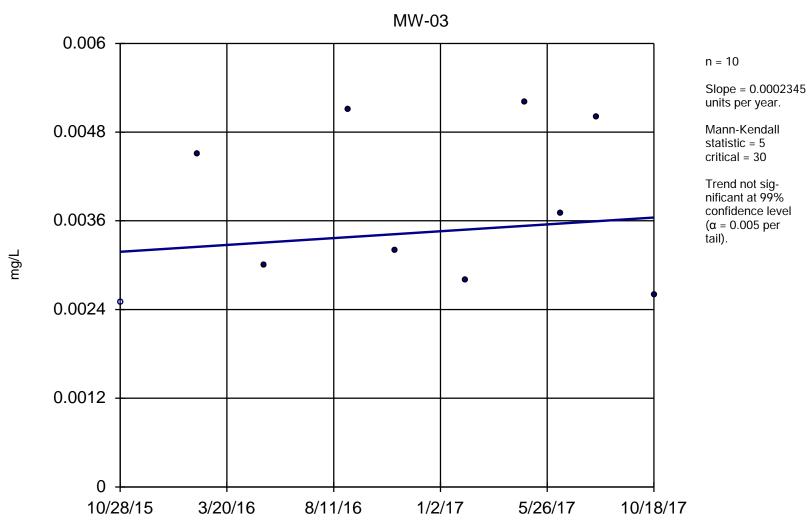


Constituent: Selenium, Dissolved Analysis Run 4/2/2021 11:02 AM
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

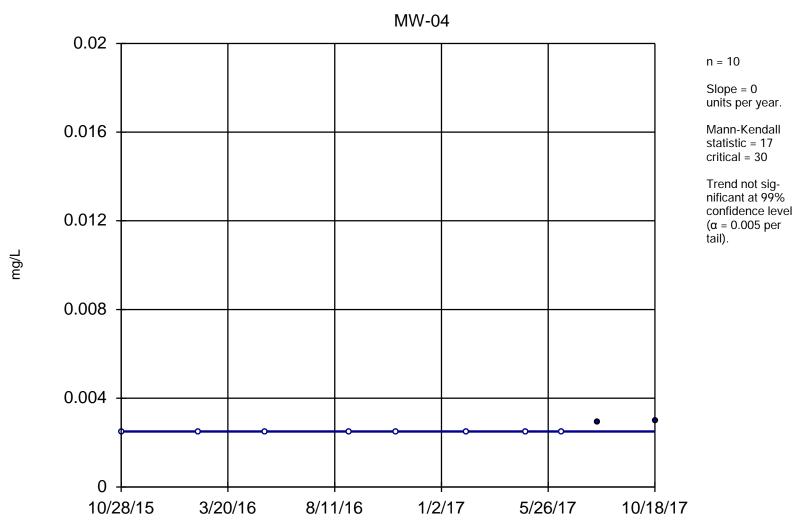




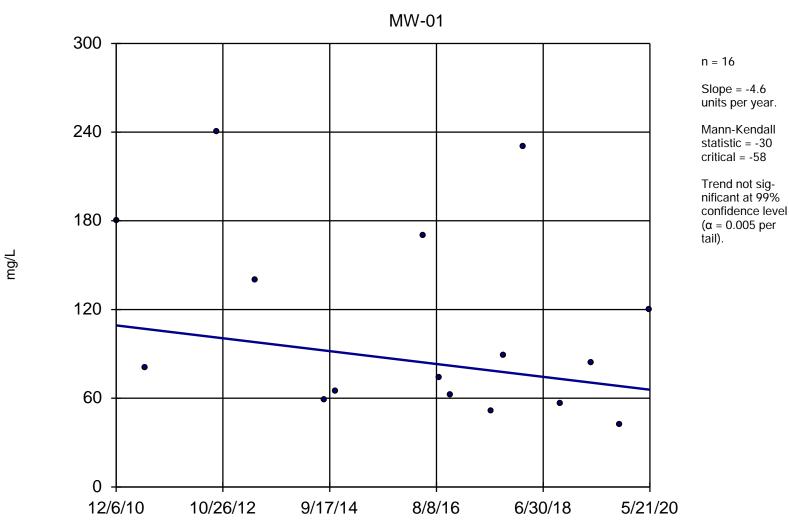




Constituent: Selenium, Total Analysis Run 4/2/2021 11:02 AM

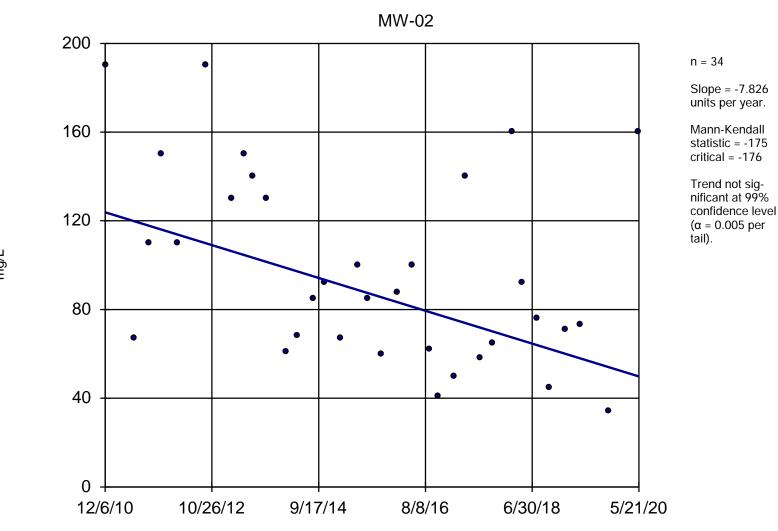


Constituent: Selenium, Total Analysis Run 4/2/2021 11:02 AM
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



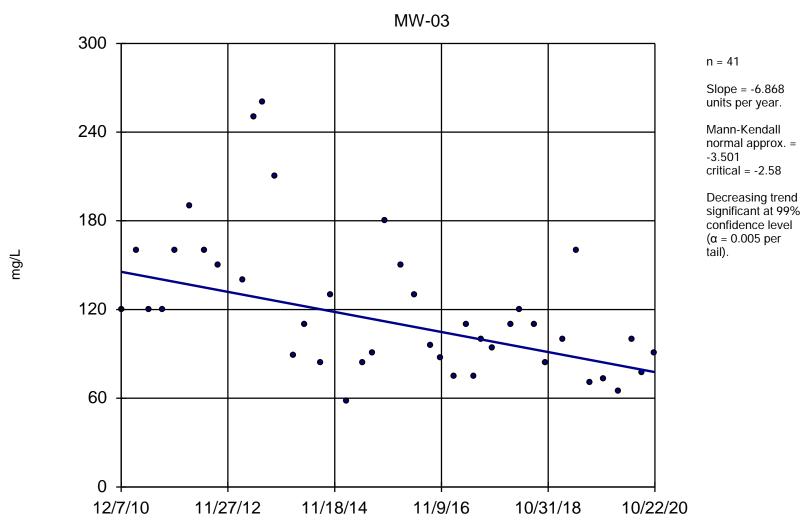
Constituent: Sulfate Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



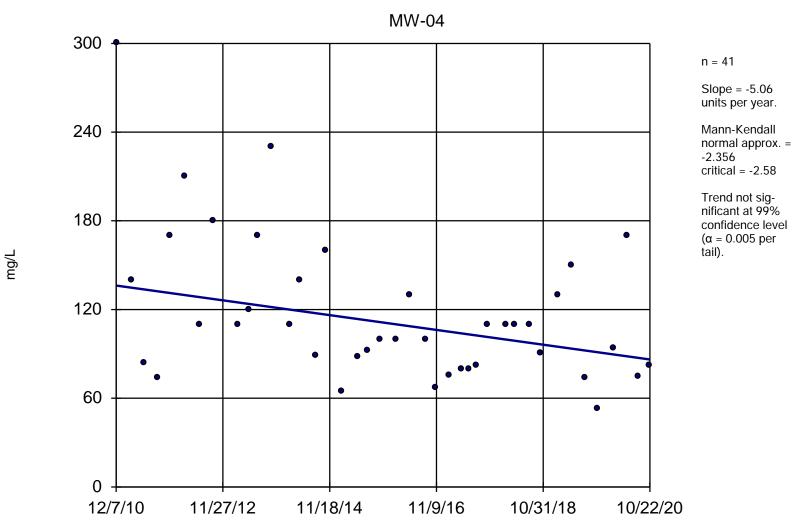
Constituent: Sulfate Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



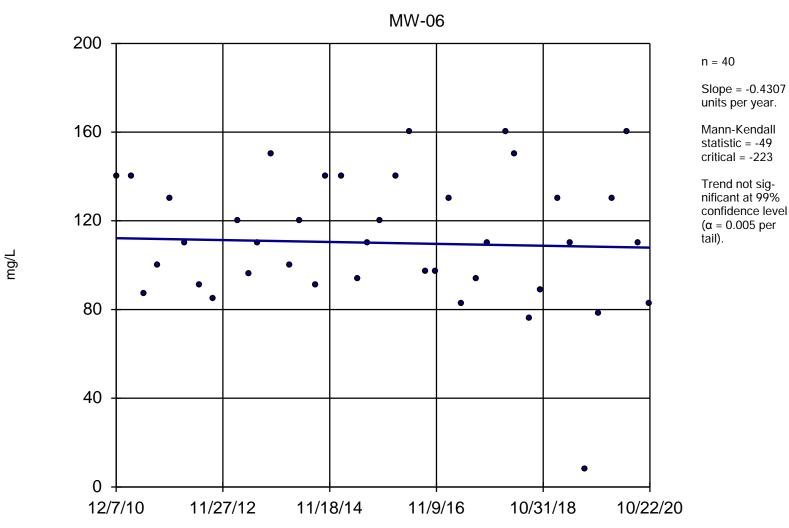
Constituent: Sulfate Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



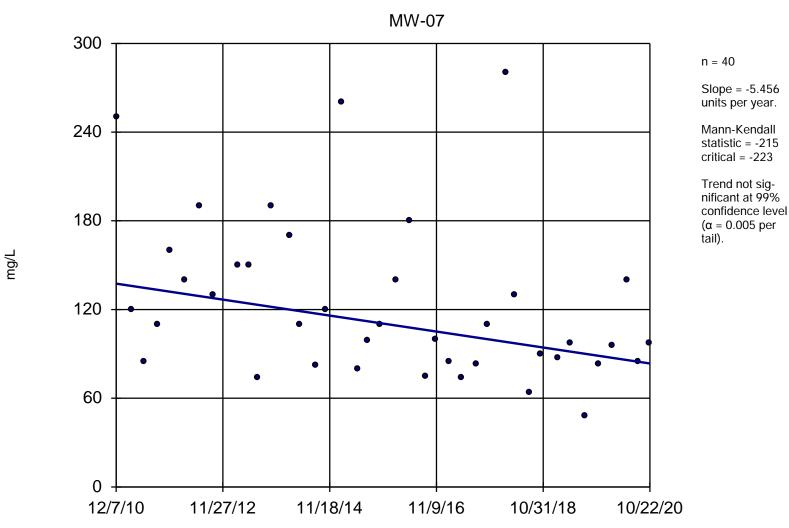
Constituent: Sulfate Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database



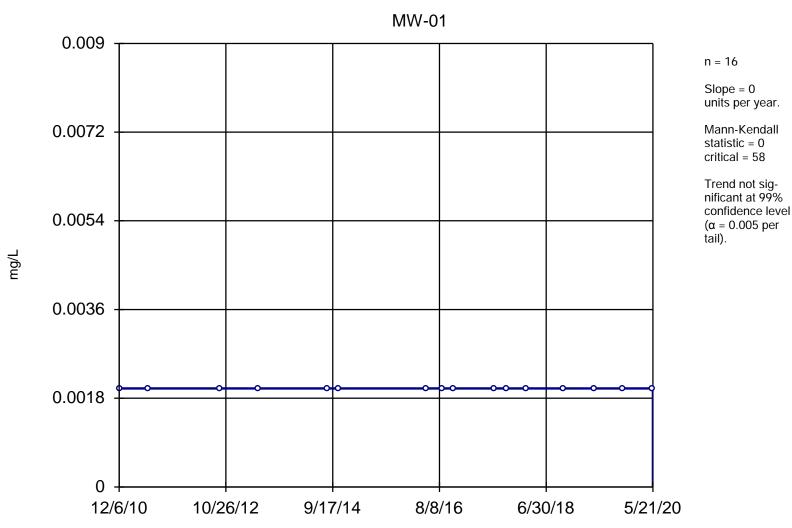
Constituent: Sulfate Analysis Run 4/2/2021 11:02 AM

Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

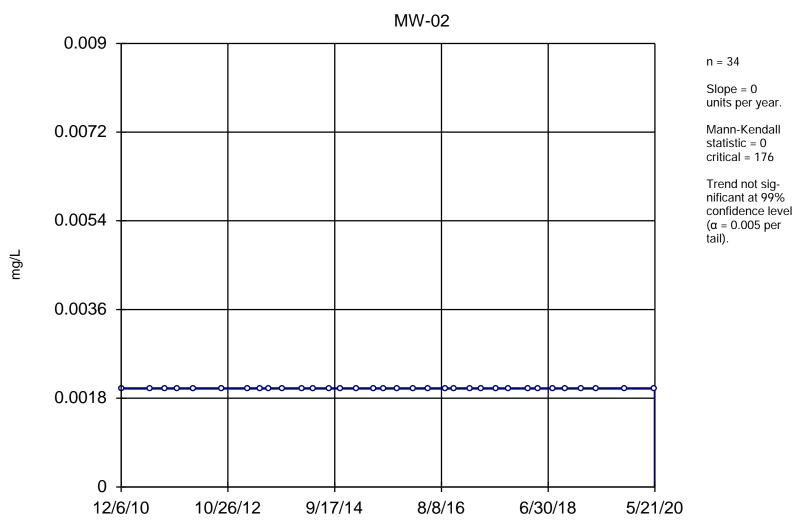


Constituent: Sulfate Analysis Run 4/2/2021 11:02 AM

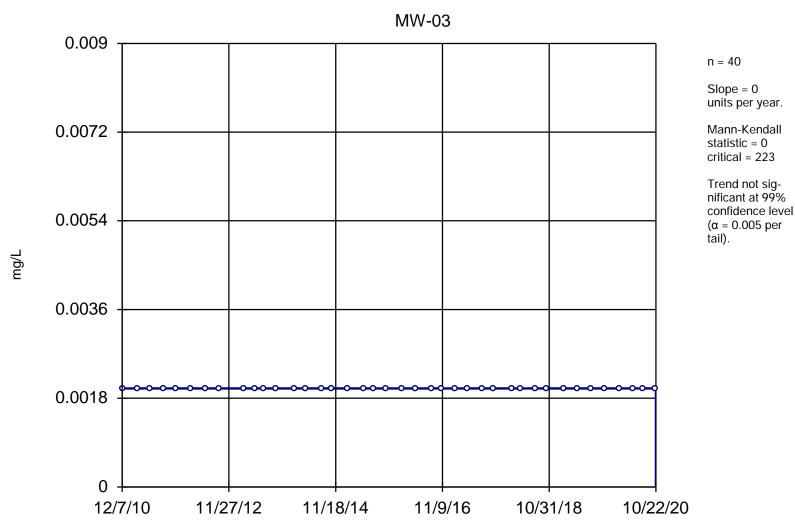
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

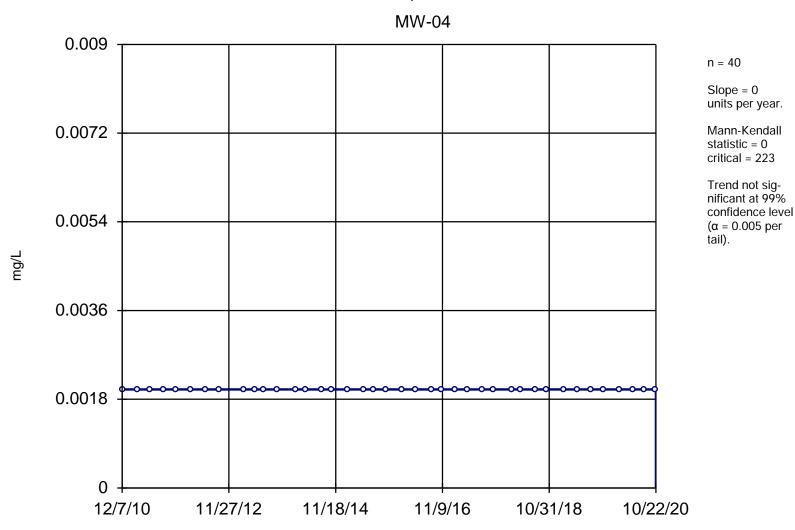


Constituent: Thallium, Dissolved Analysis Run 4/2/2021 11:02 AM

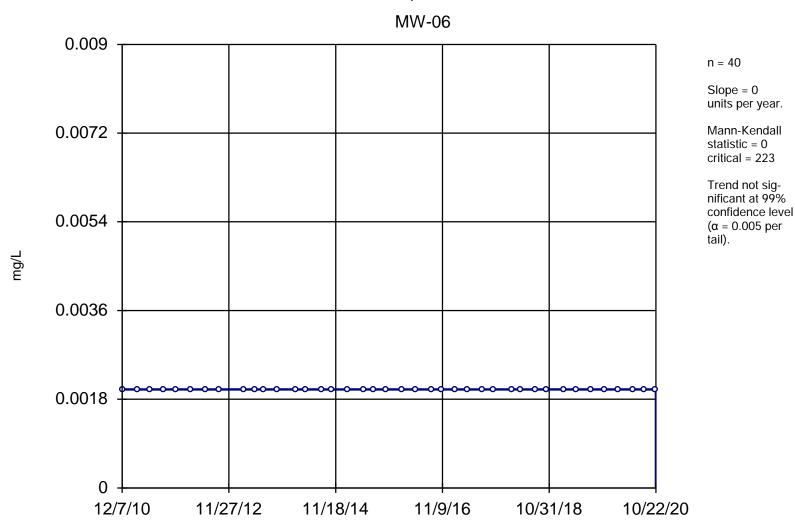


Constituent: Thallium, Dissolved Analysis Run 4/2/2021 11:02 AM

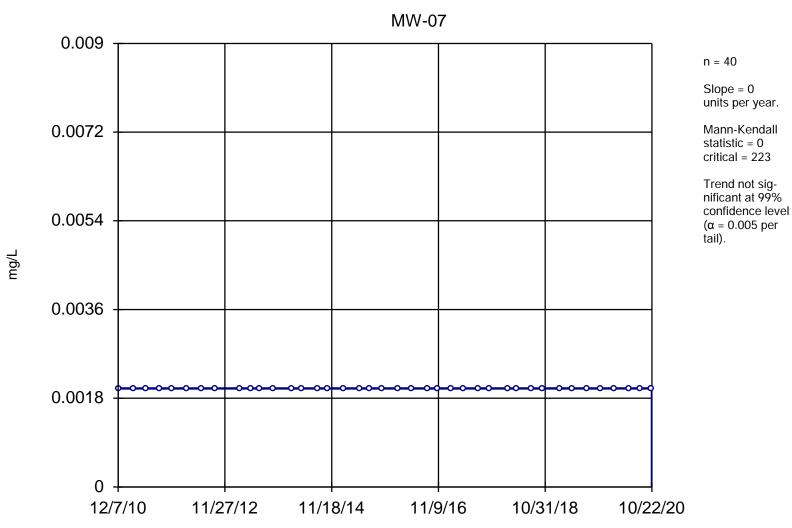


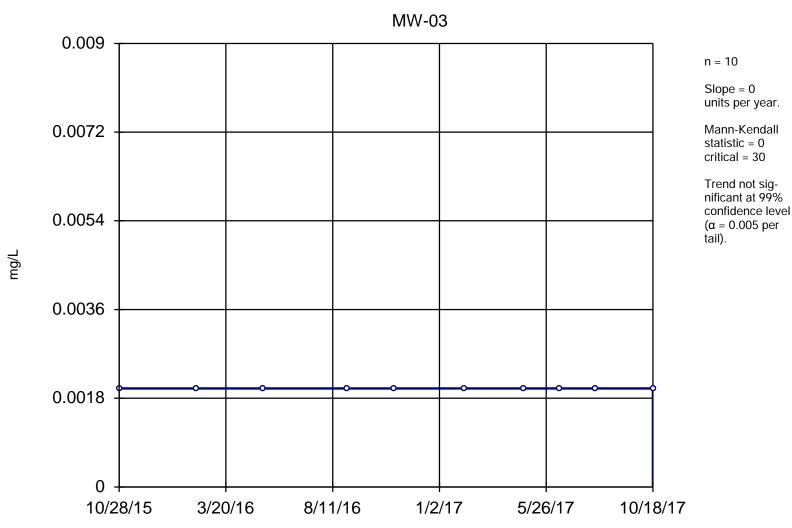


Constituent: Thallium, Dissolved Analysis Run 4/2/2021 11:03 AM



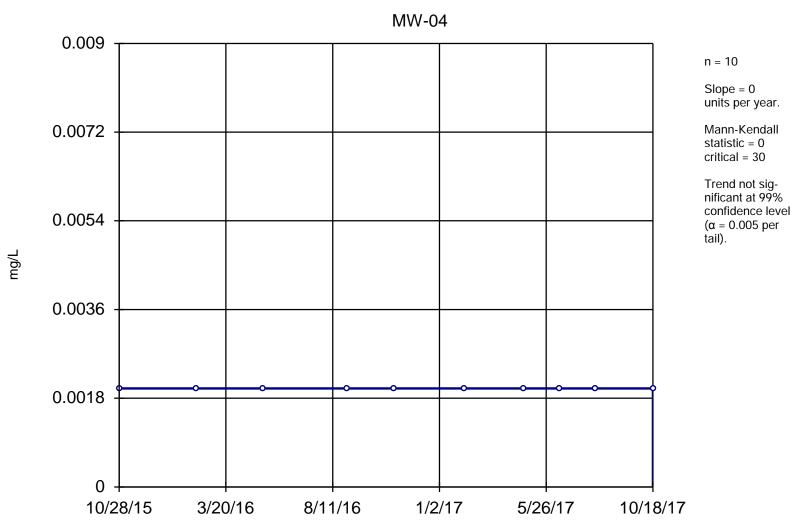
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 11:03 AM



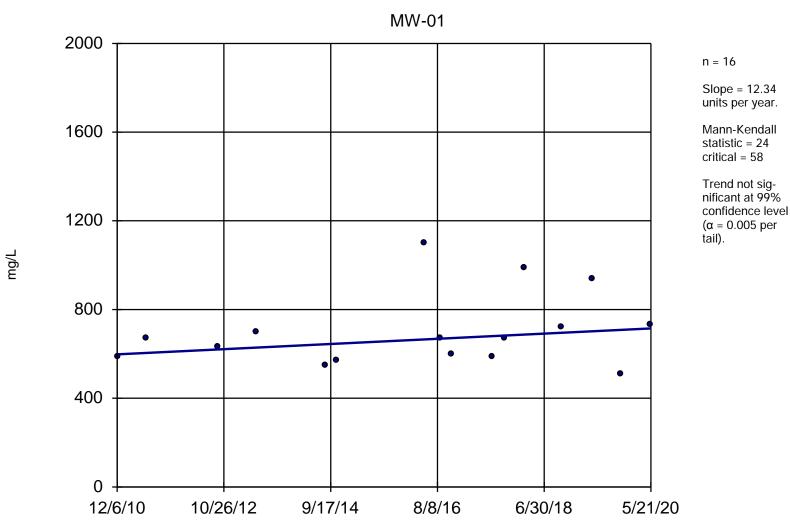


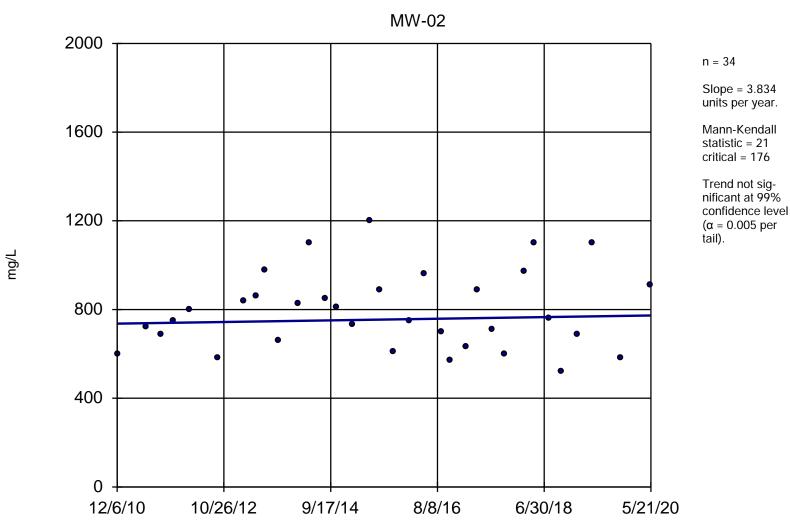
Constituent: Thallium, Total Analysis Run 4/2/2021 11:03 AM

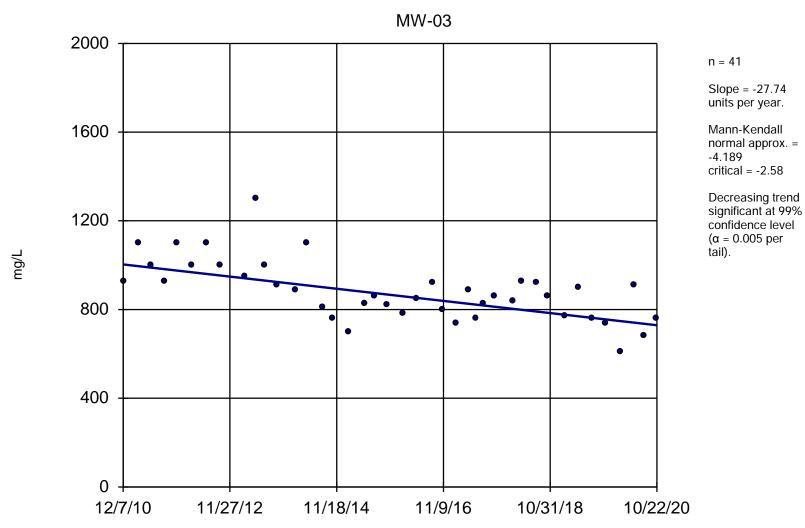
Utility Site J Client: Weaver Consultants Group Data: Joliet 29 Sanitas Database

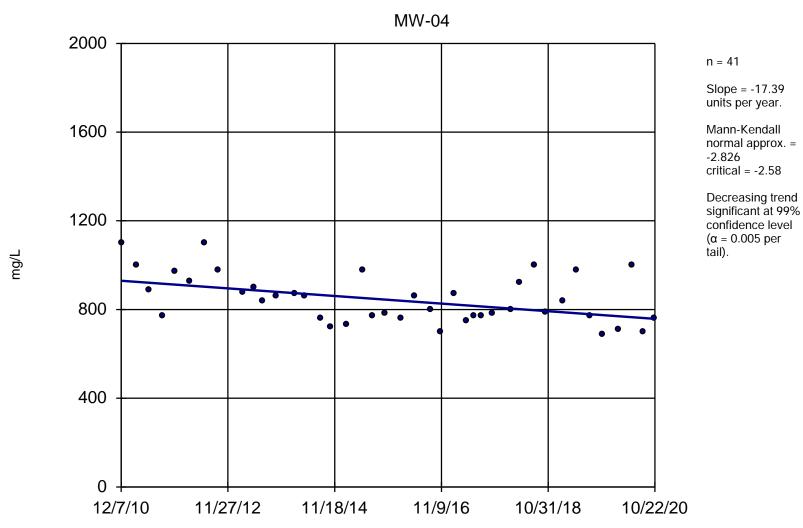


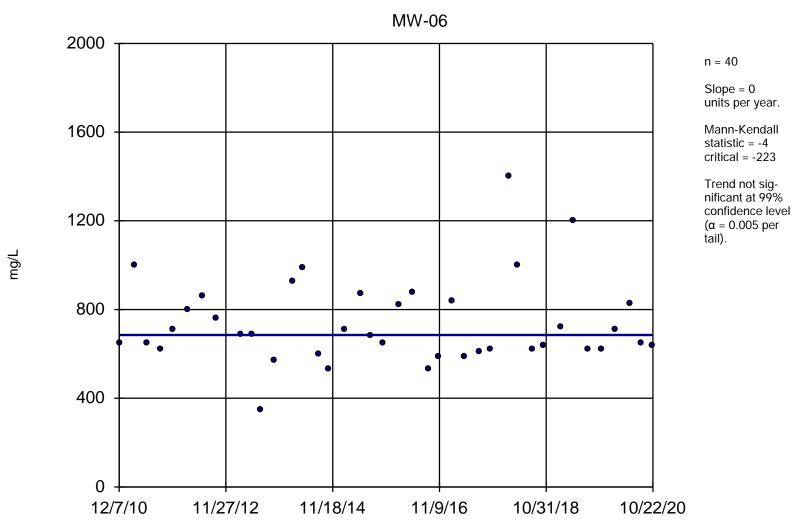
Constituent: Thallium, Total Analysis Run 4/2/2021 11:03 AM

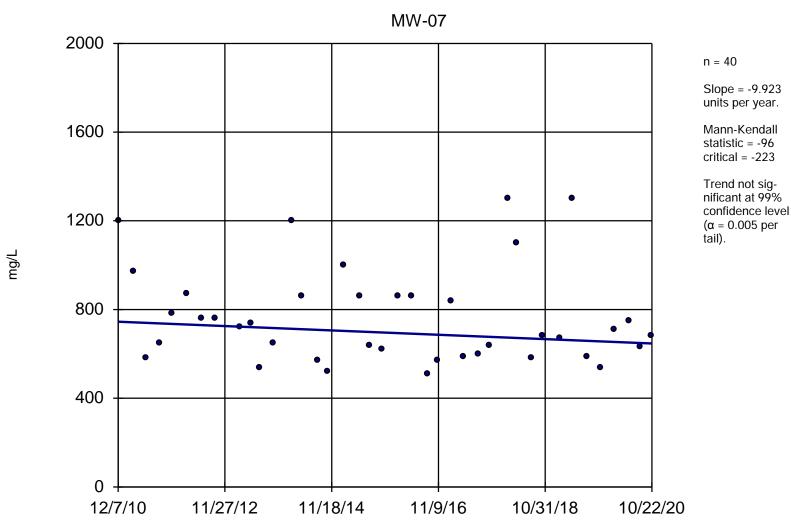












# Trend Test

	Utility Site P	Client: Weaver C	onsultants Grou	up Data: Pov	werton Sani	tas Databa	ase Printe	d 4/2/2021, 11:4	18 AM		
Constituent	Well	Slope	Calc.	Critical	Sig.	<u>N</u>	%NDs	Normality	<u>Xform</u>	<u>Alpha</u>	Method
Antimony, Dissolved (mg/L)	MW-03	0	-22	-214	No	39	97.44	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-04	0	0	214	No	39	100	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-05	0	0	214	No	39	100	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-06	0	0	214	No	39	100	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-07	0	0	214	No	39	100	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-08	0	0	206	No	38	100	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-13	0	0	199	No	37	100	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-14	0	0	199	No	37	100	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-15	0	0	199	No	37	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-03	0	0	21	No	8	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-04	0	0	21	No	8	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-05	0	0	34	No	11	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-08	0	0	43	No	13	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-15	0	0	43	No	13	100	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-03	0	-183	-214	No	39	64.1	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-04	0	-49	-214	No	39	94.87	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-05	0	-24	-214	No	39	94.87	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-06	-0.00	-267	-214	Yes	39	28.21	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-07	-0.00145	-42	-214	No	39	2.564	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-08	-0.00	-365	-206	Yes	38	23.68	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-13	-0.00	-89	-199	No	37	0	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-14	-0.00	-282	-199	Yes	37	24.32	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-15	-0.00	-353	-199	Yes	37	16.22	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-03	3.9e-11	5	25	No	9	11.11	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-04	0	0	25	No	9	88.89	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-05	0	0	38	No	12	91.67	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-08	-0.00	-6	-53	No	15	0	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-15	-0.00	-42	-53	No	15	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-03	0	11	214	No	39	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-04	-0.00	-268	-214	Yes	39	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-05	-0.00	-129	-214	No	39	2.564	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-06	-0.00	-431	-214	Yes	39	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-07	-0.00	-102	-214	No	39	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-08	-0.00	-282	-206	Yes	38	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-13	0	-7	-199	No	37	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-14	0.000	79	199	No	37	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-15	-0.00	-171	-199	No	37	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-03	0	1	25	No	9	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-04	-0.00	-11	-25	No	9	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-05	-0.00	-10	-38	No	12	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-08	-0.00	-33	-53	No	15	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-15	-0.00	-7	-53	No	15	0	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-03	0	0	214	No	39	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-04	0	0	214	No	39	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-05	0	0	214	No	39	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-06	0	0	214	No	39	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-07	0	0	214	No	39	100	n/a	n/a	<sub>0.0</sub> MWG13	3-1 <b>§</b> <sub>12</sub> 81654
Ranyllium Dissolvad (ma/l )	M/M-U8	Λ	Λ	206	No	વઘ	100	n/a	n/a	0.01	NP

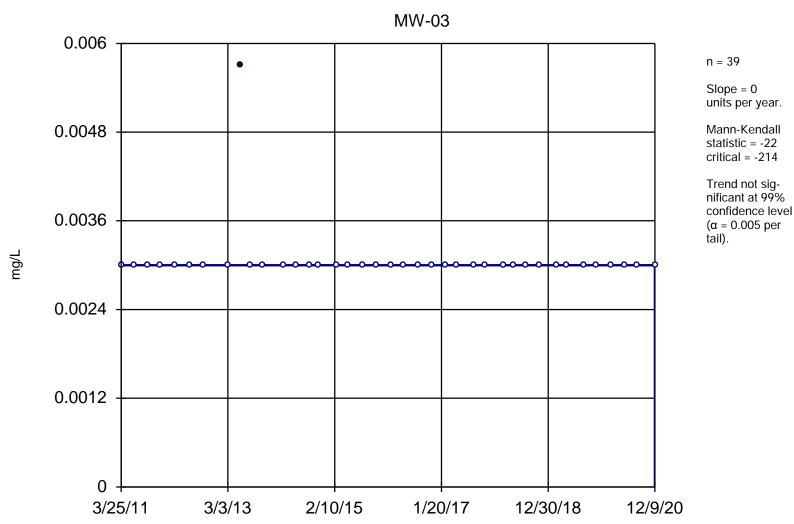
**Trend Test** Page 2

Descent		Utility Site P	Client: Weaver C	onsultants Gro	oup Data: Pov	werton Sani	tas Databa	ase Printe	d 4/2/2021, 11:4	18 AM		
Despitato   Total (mg/L)	Constituent	<u>Well</u>	Slope	Calc.	Critical	Sig.	<u>N</u>	%NDs	Normality	<u>Xform</u>	<u>Alpha</u>	Method
Description Total rings	Beryllium, Dissolved (mg/L)	MW-15	0	0	199			100	n/a	n/a	0.01	NP
Designation Total (mg/L)   MW-65   0	Beryllium, Total (mg/L)	MW-03	0	0	21	No	8	100	n/a	n/a	0.01	NP
Benyllum Total (mg/L)	Beryllium, Total (mg/L)	MW-04	0	0	21	No	8	100	n/a	n/a	0.01	NP
Berlinn Total (mpt)	Beryllium, Total (mg/L)	MW-05	0	0	34	No	11	100	n/a	n/a	0.01	NP
Bernin Total (mg/L)	Beryllium, Total (mg/L)	MW-08	0	0	43	No	13	100	n/a	n/a	0.01	NP
		MW-15	0	0	43	No	13	100	n/a	n/a	0.01	NP
Description (mpt)   MW-66   -0.0887   -377   -214   Yes   39   -2.584   or	Boron, Dissolved (mg/L)	MW-03	-0.01931	-132	-214	No	39	2.564	n/a	n/a	0.01	NP
	Boron, Dissolved (mg/L)	MW-04	-0.04286	-267	-214	Yes	39	0	n/a	n/a	0.01	NP
Boon, Disached (mg1)	Boron, Dissolved (mg/L)	MW-05	-0.03687	-377	-214	Yes	39	2.564	n/a	n/a	0.01	NP
Description	Boron, Dissolved (mg/L)	MW-06	-0.0247	-339	-214	Yes	39	0	n/a	n/a	0.01	NP
Bonn, Dissolved (mgL)	Boron, Dissolved (mg/L)	MW-07	0	11	214	No	39	0	n/a	n/a	0.01	NP
Decining   Decining	Boron, Dissolved (mg/L)	MW-08	0	12	206	No	38	0	n/a	n/a	0.01	NP
Borno, Total (mg/L)	Boron, Dissolved (mg/L)	MW-13	-0.0693	-146	-199	No	37	0	n/a	n/a	0.01	NP
Bonn, Total (mg/L)	Boron, Dissolved (mg/L)	MW-14	0	37	199	No	37	0	n/a	n/a	0.01	NP
Bonn, Total (mg/L)	Boron, Dissolved (mg/L)	MW-15	0.04385	150	199	No	37	0	n/a	n/a	0.01	NP
Boron, Total (mg/L)		MW-03	-0.04515	-16	-25	No	9	0	n/a	n/a	0.01	NP
Boron, Total (mg/L)	Boron, Total (mg/L)			-4		No	9	0	n/a	n/a		
Boron, Total (mg/L)		MW-05	-0.05707	-45	-38	Yes	12	0	n/a	n/a	0.01	NP
Boron, Total (mg/L)		MW-08	-0.1821			Yes		0			0.01	NP
Cadmium, Dissolved (mg/L)		MW-15	-0.02899	-11	-53	No	15	0	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L) Gadmium, Dissolved (mg/L) Gadmium, Dissolved (mg/L) Gadmium, Dissolved (mg/L) MW-06 0 0 0 0 214 No 39 100 n/a 174 No 174 0.01 NP Cadmium, Dissolved (mg/L) Gadmium, Dissolved (mg/L) Gadmium, Dissolved (mg/L) MW-07 0 0 3-66 2-214 No 39 97.44 n/a n/a 0.01 NP Cadmium, Dissolved (mg/L) Gadmium, Dissolved (mg/L) Gadmium, Dissolved (mg/L) MW-13 0 0 0 199 No 37 100 n/a 100 n/a 100 n/a 0 0 0 199 No 37 56.76 n/a 0 0 0 199 No 37 100 n/a 0 0 0 199 No 37 100 n/a 0 0 0 100 n/a 0 0 0 100 n/a 0 0 0 100 0 0 0 0 0 0 0 0 0 0 0 0 0 0		MW-03	0	0	214	No	39	100	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)         MW-06         0         0         214         No         39         100         n/a         n/a         0.01         NP           Cadmium, Dissolved (mg/L)         MW-07         0         -36         -214         No         39         97.44         n/a         n/a         0.01         NP           Cadmium, Dissolved (mg/L)         MW-08         0         0         0         199         No         37         100         n/a         n/a         0.01         NP           Cadmium, Dissolved (mg/L)         MW-13         0         199         No         37         56.76         n/a         n/a         0.01         NP           Cadmium, Dissolved (mg/L)         MW-15         0         0         199         No         37         56.76         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-03         0         0         21         No         8         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-03         0         0         34         No         11         100         n/a         n/a         0.01         NP           C	Cadmium, Dissolved (mg/L)	MW-04	0	0	214	No	39	100	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)         MW-07         0         -36         -214         No         39         97.44         n/a         n/a         0.01         NP           Cadmium, Dissolved (mg/L)         MW-08         0         0         206         No         38         100         n/a         n/a         0.01         NP           Cadmium, Dissolved (mg/L)         MW-14         0         109         199         No         37         100         n/a         n/a         0.01         NP           Cadmium, Dissolved (mg/L)         MW-15         0         0         199         No         37         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-03         0         0         21         No         8         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-05         0         0         21         No         8         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-05         0         0         25         No         11         100         n/a         n/a         0.01         NP           Cadmium,	Cadmium, Dissolved (mg/L)	MW-05	0	16	214	No	39	94.87	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)         MW-08         0         0         206         No         38         100         n/a         n/a         0.01         NP           Cadmium, Dissolved (mg/L)         MW-13         0         0         199         No         37         100         n/a         n/a         0.01         NP           Cadmium, Dissolved (mg/L)         MW-14         0         109         199         No         37         56.76         n/a         n/a         0.01         NP           Cadmium, Dissolved (mg/L)         MW-15         0         0         199         No         37         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-03         0         0         21         No         8         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-04         0         0         21         No         8         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-08         0         -12         -53         No         15         93.33         n/a         n/a         0.01         NP           Cadmium	Cadmium, Dissolved (mg/L)	MW-06	0	0	214	No	39	100	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)         MW-13         0         199         No         37         100         n/a         n/a         0.01         NP           Cadmium, Dissolved (mg/L)         MW-14         0         109         199         No         37         56.76         n/a         n/a         0.01         NP           Cadmium, Dissolved (mg/L)         MW-15         0         0         199         No         37         56.76         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-03         0         0         21         No         8         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-04         0         0         21         No         8         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-05         0         0         34         No         11         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-05         0         -18         -53         No         15         73.33         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)	Cadmium, Dissolved (mg/L)	MW-07	0	-36	-214	No	39	97.44	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)   MW-13   0   199   No 37   100   n/a   n/a   0.01   NP	Cadmium, Dissolved (mg/L)	MW-08	0	0	206	No	38	100	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)         MW -15         0         0         199         No         37         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW -03         0         0         21         No         8         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW -04         0         0         21         No         8         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW -05         0         0         34         No         11         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW -08         0         -12         -53         No         15         93.33         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW -05         0         -18         -53         No         15         93.33         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW -03         0         -18         -53         No         15         93.33         n/a         n/a         0.01         NP           Calcium,		MW-13	0	0	199	No	37	100	n/a	n/a	0.01	NP
Cadmium, Total (mg/L)         MW-03         0         0         21         No         8         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-04         0         0         21         No         8         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-05         0         0         34         No         11         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-08         0         -12         -53         No         15         93.33         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-03         0         -18         -53         No         15         93.33         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-03         0         0         25         No         9         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-05         0         9         38         No         12         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)	Cadmium, Dissolved (mg/L)	MW-14	0	109	199	No	37	56.76	n/a	n/a	0.01	NP
Cadmium, Total (mg/L) MW-04 0 0 0 21 No 8 100 n/a n/a 0.01 NP Cadmium, Total (mg/L) MW-05 0 0 0 34 No 11 100 n/a n/a 0.01 NP Cadmium, Total (mg/L) MW-08 0 1-12 -53 No 15 93.33 n/a n/a 0.01 NP Cadmium, Total (mg/L) MW-08 0 1-12 -53 No 15 93.33 n/a n/a 0.01 NP Cadmium, Total (mg/L) MW-05 0 0 18 -53 No 15 73.33 n/a n/a 0.01 NP Calcium, Total (mg/L) MW-03 0 0 25 No 9 0 n/a n/a 0.01 NP Calcium, Total (mg/L) MW-04 -4.423 -6 -25 No 9 0 n/a n/a 0.01 NP Calcium, Total (mg/L) MW-05 0 9 0 n/a n/a 0.01 NP Calcium, Total (mg/L) MW-05 0 9 0 n/a n/a 0.01 NP Calcium, Total (mg/L) MW-05 0 9 0 n/a n/a 0.01 NP Calcium, Total (mg/L) MW-05 0 9 0 n/a n/a 0.01 NP Calcium, Total (mg/L) MW-05 16.29 -53 Yes 15 0 n/a n/a 0.01 NP Calcium, Total (mg/L) MW-05 16.29 -53 SNO 15 0 n/a n/a 0.01 NP Calcium, Total (mg/L) MW-05 16.29 -53 SNO 15 0 n/a n/a 0.01 NP Calcium, Total (mg/L) MW-05 16.29 1.283 -2.58 NO 15 0 n/a n/a 0.01 NP Chloride (mg/L) MW-05 1.508 1.05 1.05 1.223 NO 14 0 n/a n/a 0.01 NP Chloride (mg/L) MW-05 1.508 1.508 1.29 1.223 NO 14 0 n/a n/a n/a 0.01 NP Chloride (mg/L) MW-05 1.508 1.29 1.223 NO 14 0 0 n/a n/a n/a 0.01 NP Chloride (mg/L) MW-05 1.508 1.294 1.223 Yes 10 n/a n/a n/a 0.01 NP Chloride (mg/L) MW-06 1.5.6 1.295 1.214 Yes 39 0 n/a n/a n/a 0.01 NP Chloride (mg/L) MW-08 1.684 1.1249 1.255 NO 11 0 n/a n/a 0.01 NP Chloride (mg/L) MW-08 1.684 1.1249 1.255 NO 11 0 n/a n/a n/a 0.01 NP Chloride (mg/L) MW-08 1.500 1.2917 1.699 1.99 NO 37 0 n/a n/a n/a 0.01 NP 1.01 NP 1.01 0 n/a n/a 0.01 NP	Cadmium, Dissolved (mg/L)	MW-15	0	0	199	No	37	100	n/a	n/a	0.01	NP
Cadmium, Total (mg/L)         MW-05         0         0         34         No         11         100         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-08         0         -12         -53         No         15         93.33         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-05         0         -18         -53         No         15         73.33         n/a         n/a         0.01         NP           Cadicium, Total (mg/L)         MW-03         0         0         25         No         9         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-04         -4.423         -6         -25         No         9         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-05         0         9         38         No         12         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-08         -10.81         -69         -53         Yes         15         0         n/a         n/a         0.01         NP           Calcium, Total (m	Cadmium, Total (mg/L)	MW-03	0	0	21	No	8	100	n/a	n/a	0.01	NP
Cadmium, Total (mg/L)         MW-08         0         -12         -53         No         15         93.33         n/a         n/a         0.01         NP           Cadmium, Total (mg/L)         MW-15         0         -18         -53         No         15         73.33         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-03         0         0         25         No         9         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-04         -4.423         -6         -25         No         9         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-05         0         9         38         No         12         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-05         0         9         38         No         12         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-05         -16.29         -53         -53         No         15         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)	Cadmium, Total (mg/L)	MW-04	0	0	21	No	8	100	n/a	n/a	0.01	NP
Cadmium, Total (mg/L)         MW-15         0         -18         -53         No         15         73.33         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-03         0         0         25         No         9         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-04         -4.423         -6         -25         No         9         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-05         0         9         38         No         12         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-08         -10.81         -69         -53         Yes         15         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-08         -10.81         -69         -53         Yes         15         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-03         -16.29         -53         -53         No         15         0         n/a         n/a         0.01         NP           Chloride (	Cadmium, Total (mg/L)	MW-05	0	0	34	No	11	100	n/a	n/a	0.01	NP
Calcium, Total (mg/L)         MW-03         0         0         25         No         9         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-04         -4.423         -6         -25         No         9         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-05         0         9         38         No         12         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-08         -10.81         -69         -53         Yes         15         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-08         -10.81         -69         -53         Yes         15         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-03         -16.29         -53         -53         No         15         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-03         -0.6472         -1.283         -2.58         No         41         0         n/a         n/a         0.01         NP           Chloride	Cadmium, Total (mg/L)	MW-08	0	-12	-53	No	15	93.33	n/a	n/a	0.01	NP
Calcium, Total (mg/L)         MW-04         -4.423         -6         -25         No         9         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-05         0         9         38         No         12         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-08         -10.81         -69         -53         Yes         15         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-05         -16.29         -53         -53         No         15         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-03         -16.29         -53         -53         No         15         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-03         -16.29         -53         -53         No         15         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-03         -0.6472         -1.283         -2.258         No         40         0         n/a         n/a         0.01         NP	Cadmium, Total (mg/L)	MW-15	0	-18	-53	No	15	73.33	n/a	n/a	0.01	NP
Calcium, Total (mg/L)         MW-05         0         9         38         No         12         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-08         -10.81         -69         -53         Yes         15         0         n/a         n/a         0.01         NP           Calcium, Total (mg/L)         MW-05         -16.29         -53         -53         No         15         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-03         -0.6472         -1.283         -2.58         No         41         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-03         -1.503         -105         -223         No         40         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-05         -5.086         -249         -223         Yes         40         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-06         -5.6         -215         -214         Yes         39         0         n/a         n/a         0.01         NP           Chloride (m	Calcium, Total (mg/L)	MW-03	0	0	25	No	9	0	n/a	n/a	0.01	NP
Calcium, Total (mg/L) Calcium, Total (mg/L) MW-05 -16.29 -53 -53 No 15 0 n/a n/a 0.01 NP Calcium, Total (mg/L)  MW-05 -16.29 -53 -53 No 15 0 n/a n/a 0.01 NP Chloride (mg/L)  MW-03 -0.6472 -1.283 -2.58 No 41 0 n/a 0.01 NP Chloride (mg/L)  MW-04 -1.503 -105 -223 No 40 0 n/a n/a 0.01 NP Chloride (mg/L)  Chloride (mg/L)  MW-05 -5.086 -249 -223 Yes 40 0 n/a n/a 0.01 NP Chloride (mg/L)  Chloride (mg/L)  MW-06 -5.6 -215 -214 Yes 39 0 n/a n/a 0.01 NP Chloride (mg/L)  Chloride (mg/L)  MW-07 3.37 265 214 Yes 39 0 n/a n/a 0.01 NP Chloride (mg/L)  Chloride (mg/L)  MW-08 -6.84 -1.249 -2.58 No 41 0 n/a 0.01 NP Chloride (mg/L)  Chloride (mg/L)  MW-08 -6.84 -1.249 -2.58 No 41 0 n/a 0.01 NP Chloride (mg/L)  Chloride (mg/L)  MW-13 -2.917 -169 -199 No 37 0 n/a n/a 0.04 WG-13-1 NP	Calcium, Total (mg/L)	MW-04	-4.423	-6	-25	No	9	0	n/a	n/a	0.01	NP
Calcium, Total (mg/L)  MW-15  -16.29  -53  -53  No  15  0  n/a  n/a  0.01  NP  Chloride (mg/L)  Chloride (mg/L)  MW-03  -0.6472  -1.283  -2.58  No  41  0  n/a  n/a  0.01  NP  Chloride (mg/L)  Chloride (mg/L)  MW-04  -1.503  -105  -223  No  40  0  n/a  n/a  0.01  NP  Chloride (mg/L)  Chloride (mg/L)  MW-05  -5.086  -249  -223  Yes  40  0  n/a  n/a  0.01  NP  Chloride (mg/L)  Chloride (mg/L)  MW-06  -5.6  -215  -214  Yes  39  0  n/a  n/a  0.01  NP  Chloride (mg/L)  Chloride (mg/L)  MW-07  3.37  265  214  Yes  39  0  n/a  n/a  0.01  NP  Chloride (mg/L)  Chloride (mg/L)  MW-08  -6.84  -1.249  -2.58  No  41  0  n/a  n/a  0.01  NP  Chloride (mg/L)  Chloride (mg/L)  MW-13  -2.917  -169  -199  No  37  0  n/a  n/a  0.01  NP  Chloride (mg/L)  NW-13  -2.917  -169  -199  No  37  0  n/a  n/a  0.01  NP  Chloride (mg/L)	Calcium, Total (mg/L)	MW-05	0	9	38	No	12	0	n/a	n/a	0.01	NP
Chloride (mg/L)       MW-03       -0.6472       -1.283       -2.58       No       41       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-04       -1.503       -105       -223       No       40       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-05       -5.086       -249       -223       Yes       40       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-06       -5.6       -215       -214       Yes       39       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-07       3.37       265       214       Yes       39       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-08       -6.84       -1.249       -2.58       No       41       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-13       -2.917       -169       -199       No       37       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-14       -6.008       -305       -199       Yes       37       0       n/a	Calcium, Total (mg/L)	MW-08	-10.81	-69	-53	Yes	15	0	n/a	n/a	0.01	NP
Chloride (mg/L)       MW-04       -1.503       -105       -223       No       40       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-05       -5.086       -249       -223       Yes       40       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-06       -5.6       -215       -214       Yes       39       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-08       -6.84       -1.249       -2.58       No       41       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-13       -2.917       -169       -199       No       37       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-14       -6.008       -305       -199       Yes       37       0       n/a       n/a       0.01       NP	Calcium, Total (mg/L)	MW-15	-16.29	-53	-53	No	15	0	n/a	n/a	0.01	NP
Chloride (mg/L)         MW-05         -5.086         -249         -223         Yes         40         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-06         -5.6         -215         -214         Yes         39         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-07         3.37         265         214         Yes         39         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-08         -6.84         -1.249         -2.58         No         41         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-13         -2.917         -169         -199         No         37         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-14         -6.008         -305         -199         Yes         37         0         n/a         n/a         0.01         NP	Chloride (mg/L)	MW-03	-0.6472	-1.283	-2.58	No	41	0	n/a	n/a	0.01	NP
Chloride (mg/L)         MW-06         -5.6         -215         -214         Yes         39         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-07         3.37         265         214         Yes         39         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-08         -6.84         -1.249         -2.58         No         41         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-13         -2.917         -169         -199         No         37         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-14         -6.008         -305         -199         Yes         37         0         n/a         n/a         0.01         NP	Chloride (mg/L)	MW-04	-1.503	-105	-223	No	40	0	n/a	n/a	0.01	NP
Chloride (mg/L)         MW-07         3.37         265         214         Yes         39         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-08         -6.84         -1.249         -2.58         No         41         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-13         -2.917         -169         -199         No         37         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-14         -6.008         -305         -199         Yes         37         0         n/a         n/a         0.01         MWG13-16pe81655	Chloride (mg/L)	MW-05	-5.086	-249	-223	Yes	40	0	n/a	n/a	0.01	NP
Chloride (mg/L)         MW-07         3.37         265         214         Yes         39         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-08         -6.84         -1.249         -2.58         No         41         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-13         -2.917         -169         -199         No         37         0         n/a         n/a         0.01         NP           Chloride (mg/L)         MW-14         -6.008         -305         -199         Yes         37         0         n/a         n/a         0.01         MWG13-16pe81655	Chloride (mg/L)	MW-06	-5.6	-215	-214	Yes	39	0	n/a	n/a	0.01	NP
Chloride (mg/L)       MW-08       -6.84       -1.249       -2.58       No       41       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-13       -2.917       -169       -199       No       37       0       n/a       n/a       0.01       NP         Chloride (mg/L)       MW-14       -6.008       -305       -199       Yes       37       0       n/a       n/a       0.01       MWG13-16pe81655		MW-07		265	214	Yes		0	n/a	n/a	0.01	NP
Chloride (mg/L) MW-14 -6.008 -305 -199 Yes 37 0 n/a n/a 0.0∮MWG13-1¶p⊵81655		MW-08	-6.84	-1.249	-2.58	No	41	0	n/a	n/a	0.01	NP
Chloride (mg/L) MW-14 -6.008 -305 -199 Yes 37 0 n/a n/a 0.0∮MWG13-1§p⊵81655	Chloride (mg/L)	MW-13	-2.917	-169	-199	No	37	0	n/a	n/a		
Chloride (ma/l ) MW-15 -2 471 -133 -206 No 38 0 n/a n/a 0.01 NP		MW-14	-6.008	-305	-199	Yes	37	0	n/a	n/a	<b>0.0</b> ₩WG13-	1 <b>§_2</b> 81655
	Chloride (ma/L)	M\\/-15	-9 <i>4</i> 71	-133	-206	No	38	Λ	n/a	n/a	0.01	NP

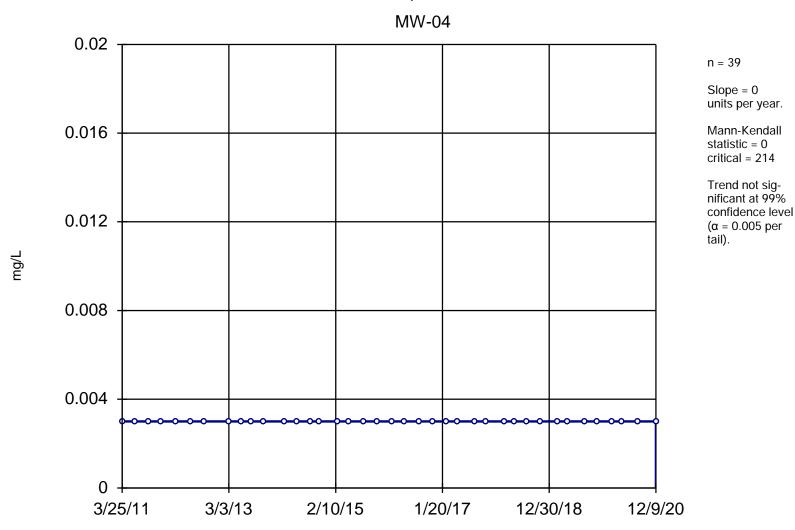
	Utility Site P	Client: Weaver Co	onsultants Grou	p Data: Pow	verton Sani	tas Databa	se Printe	d 4/2/2021, 11:4	18 AM		
Constituent	<u>Well</u>	Slope	Calc.	<u>Critical</u>	Sig.	<u>N</u>	%NDs	<u>Normality</u>	<u>Xform</u>	<u>Alpha</u>	Method
Chromium, Dissolved (mg/L)	MW-05	0	-25	-214	No	39	92.31	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-06	0	-129	-214	No	39	84.62	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-07	0	-106	-214	No	39	87.18	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-08	0	-191	-206	No	38	84.21	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-13	0	-53	-199	No	37	89.19	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-14	0	-127	-199	No	37	83.78	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-15	0	-188	-199	No	37	83.78	n/a	n/a	0.01	NP
Chromium, Total (mg/L)	MW-03	0	0	25	No	9	100	n/a	n/a	0.01	NP
Chromium, Total (mg/L)	MW-04	0	0	25	No	9	100	n/a	n/a	0.01	NP
Chromium, Total (mg/L)	MW-05	0	0	38	No	12	100	n/a	n/a	0.01	NP
Chromium, Total (mg/L)	MW-08	0	0	43	No	13	100	n/a	n/a	0.01	NP
Chromium, Total (mg/L)	MW-15	0	0	43	No	13	100	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-03	0	0	214	No	39	100	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-04	0	-38	-214	No	39	97.44	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-05	0	-205	-214	No	39	82.05	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-06	0	-23	-214	No	39	94.87	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-07	-0.00	-189	-214	No	39	5.128	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-08	0	0	206	No	38	100	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-13	0	-101	-199	No	37	91.89	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-14	0	19	199	No	37	94.59	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-15	0	0	199	No	37	100	n/a	n/a	0.01	NP
Cobalt, Total (mg/L)	MW-03	0	0	25	No	9	100	n/a	n/a	0.01	NP
Cobalt, Total (mg/L)	MW-04	0	0	25	No	9	100	n/a	n/a	0.01	NP
Cobalt, Total (mg/L)	MW-05	0	0	38	No	12	100	n/a	n/a	0.01	NP
Cobalt, Total (mg/L)	MW-08	0	0	53	No	15	100	n/a	n/a	0.01	NP
Cobalt, Total (mg/L)	MW-15	0	14	53	No	15	93.33	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-03	-0.00	-1.688	-2.58	No	41	7.317	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-04	-0.00	-138	-223	No	40	7.5	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-05	0.004669	134	223	No	40	7.5	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-06	-0.00	-90	-214	No	39	0	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-07	-0.00	-154	-214	No	39	0	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-08	-0.04977	-4.892	-2.58	Yes	41	0	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-13	-0.00	-75	-199	No	37	2.703	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-14	-0.01334	-154	-199	No	37	0	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-15	-0.02897	-382	-206	Yes	38	0	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-03	0	-14	-214	No	39	97.44	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-04	0	0	214	No	39	100	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-05	0	0	214	No	39	100	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-06	0	-10	-214	No	39	97.44	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-07	0	-66	-214	No	39	87.18	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-08	0	0	206	No	38	100	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-13	0	0	199	No	37	100	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-14	0	-39	-199	No	37	94.59	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-15	0	-36	-199	No	37	97.3	n/a	n/a	0.01	NP
Lead, Total (mg/L)	MW-03	0	0	25	No	9	100	n/a	n/a	0.01	NP
Lead, Total (mg/L)	MW-04	0	0	25	No	9	100	n/a	n/a	0.01	NP
Lead, Total (mg/L)	MW-05	0	-5	-38	No	12	91.67	n/a	n/a	<sub>0.0</sub> MWG13-	1 <b>§</b> ∟281656
Lead Total (ma/L)	M/M/_OR	n	19	53	No	15	73 33	n/a	n/a	0.01	NP

	Utility Site P CI	ient: Weaver C	onsultants Grou	p Data: Pow	erton Sani	tas Databa	se Printe	d 4/2/2021, 11:4	8 AM		
Constituent	Well	Slope	Calc.	Critical	Sig.	<u>N</u>	%NDs	Normality	<u>Xform</u>	<u>Alpha</u>	Method
Lithium, Total (mg/L)	MW-04	0	0	21	No	8	100	n/a	n/a	0.01	NP
Lithium, Total (mg/L)	MW-05	0	0	34	No	11	100	n/a	n/a	0.01	NP
Lithium, Total (mg/L)	MW-08	0	6	53	No	15	26.67	n/a	n/a	0.01	NP
Lithium, Total (mg/L)	MW-15	-0.00	-6	-53	No	15	0	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-03	0	0	214	No	39	100	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-04	0	0	214	No	39	100	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-05	0	30	214	No	39	97.44	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-06	0	0	214	No	39	100	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-07	0	-36	-214	No	39	97.44	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-08	0	0	206	No	38	100	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-13	0	0	199	No	37	100	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-14	0	0	199	No	37	100	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-15	0	0	199	No	37	100	n/a	n/a	0.01	NP
Mercury, Total (mg/L)	MW-03	0	0	21	No	8	100	n/a	n/a	0.01	NP
Mercury, Total (mg/L)	MW-04	0	0	21	No	8	100	n/a	n/a	0.01	NP
Mercury, Total (mg/L)	MW-05	0	0	34	No	11	100	n/a	n/a	0.01	NP
Mercury, Total (mg/L)	MW-08	0	0	53	No	15	100	n/a	n/a	0.01	NP
Mercury, Total (mg/L)	MW-15	0	0	53	No	15	100	n/a	n/a	0.01	NP
Molybdenum, Total (mg/L)	MW-03	0	0	25	No	9	100	n/a	n/a	0.01	NP
Molybdenum, Total (mg/L)	MW-04	0	-1	-25	No	9	66.67	n/a	n/a	0.01	NP
Molybdenum, Total (mg/L)	MW-05	0.000	30	38	No	12	50	n/a	n/a	0.01	NP
Molybdenum, Total (mg/L)	MW-08	-0.00	-7	-53	No	15	0	n/a	n/a	0.01	NP
Molybdenum, Total (mg/L)	MW-15	-0.00	-23	-53	No	15	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-03	-0.01712	-1.063	-2.58	No	50	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-04	-0.01479	-1.398	-2.58	No	50	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-05	-0.01654	-1.217	-2.58	No	52	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-06	-0.01961	-1.472	-2.58	No	41	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-07	-0.02391	-184	-223	No	40	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-08	-0.0944	-4.543	-2.58	Yes	<del>5</del> 1	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-13	0.01192	0.6966	2.58	No	41	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-14	-0.04916	-3.382	-2.58	Yes	41	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-15	-0.01994	-1.456	-2.58	No	54	0	n/a	n/a	0.01	NP
Radium 226 + Radium 228, Combin	MW-03	0	-13	-30	No	10	80	n/a	n/a	0.01	NP
Radium 226 + Radium 228, Combin	MW-04	0	4	30	No	10	60	n/a	n/a	0.01	NP
Radium 226 + Radium 228, Combin	MW-05	0.00312	21	38	No	12	58.33	n/a	n/a	0.01	NP
Radium 226 + Radium 228, Combin	MW-08	0.00012	18	48	No	14	50	n/a	n/a	0.01	NP
Radium 226 + Radium 228, Combin	MW-15	0	-10	-48	No	14	71.43	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-03	0	-60	-214	No	39	69.23	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-04	0	-96	-214	No	39	69.23	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-05	0	-102	-214	No	39	76.92	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-06	0	72	214	No	39	74.36	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L) Selenium, Dissolved (mg/L)	MW-07	0	36	214	No	39	58.97	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L) Selenium, Dissolved (mg/L)	MW-08	0	21	206	No	38	78.95	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L) Selenium, Dissolved (mg/L)	MW-13	0.000	65	199	No	37	27.03	n/a n/a	n/a n/a	0.01	NP
Selenium, Dissolved (mg/L) Selenium, Dissolved (mg/L)	MW-14	0.000	34	199	No	37	37.84	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L) Selenium, Dissolved (mg/L)	MW-15	0	20	199	No	37	27.03	n/a	n/a	0.01	NP
Selenium, Total (mg/L)	MW-03	0	8	25	No	9	88.89	n/a n/a	n/a n/a	0.01 0.0 <b> </b> MWG13-	
Selenium Total (mg/L)	M/M/_O4	n	-A	-25 -25	No	a	88 89	n/a	n/a	0.04.77	NP

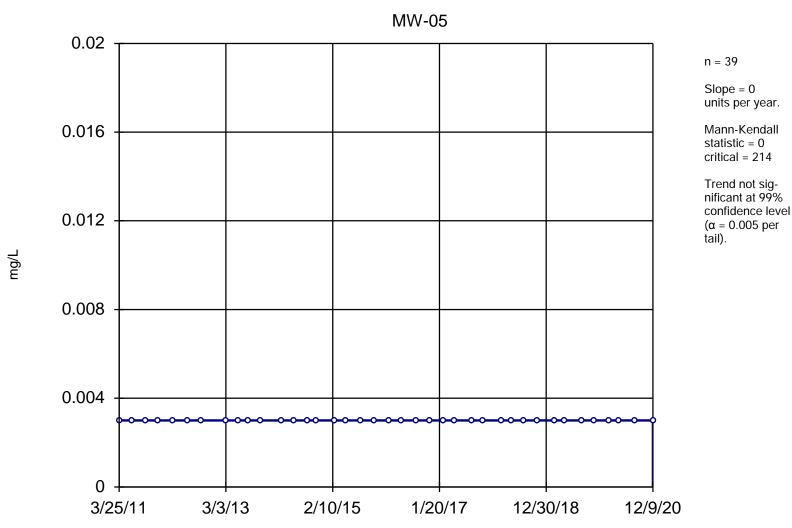
	Utility Site P	Client: Weaver Co	onsultants Group	Data: Powe	rton Sanit	as Databas	e Printe	d 4/2/2021, 11:4	8 AM		
Constituent	<u>Well</u>	Slope	Calc.	Critical	Sig.	<u>N</u>	%NDs	Normality	<u>Xform</u>	<u>Alpha</u>	Method
Selenium, Total (mg/L)	MW-15	-0.00	-6	-53	No	15	20	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-03	-2.97	-2.348	-2.58	No	41	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-04	-9.213	-219	-223	No	40	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-05	-9.096	-249	-223	Yes	40	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-06	0	3	214	No	39	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-07	1.361	73	214	No	39	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-08	-23.74	-3.881	-2.58	Yes	41	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-13	97.09	293	199	Yes	37	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-14	0	8	199	No	37	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-15	5.709	28	206	No	38	0	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-03	0	0	214	No	39	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-04	0	0	214	No	39	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-05	0	0	214	No	39	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-06	0	0	214	No	39	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-07	0	0	214	No	39	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-08	0	0	206	No	38	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-13	0	0	199	No	37	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-14	0.000	140	199	No	37	10.81	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-15	0	0	199	No	37	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-03	0	0	21	No	8	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-04	0	0	21	No	8	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-05	0	0	34	No	11	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-08	0	0	53	No	15	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-15	0	0	53	No	15	100	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-03	-5.995	-2.198	-2.58	No	41	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-04	-19.65	-224	-223	Yes	40	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-05	-21.31	-217	-223	No	40	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-06	-16.96	-167	-214	No	39	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-07	-19.4	-257	-214	Yes	39	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-08	-41.7	-2.844	-2.58	Yes	41	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-13	157.7	310	199	Yes	37	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-14	23.16	93	199	No	37	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-15	11.68	53	206	No	38	0	n/a	n/a	0.01	NP



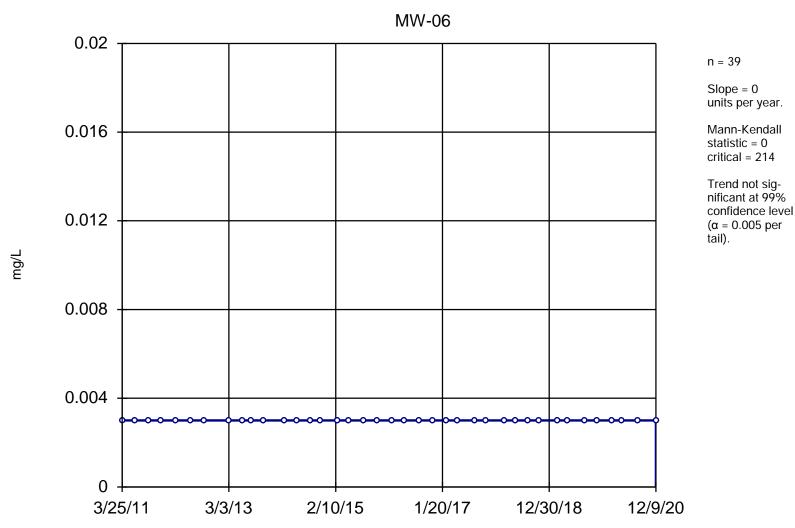
Constituent: Antimony, Dissolved Analysis Run 4/2/2021 11:43 AM



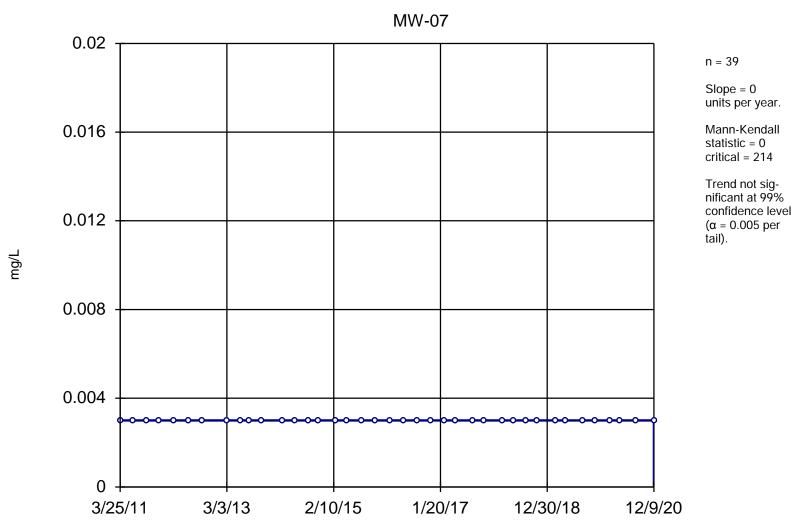
Constituent: Antimony, Dissolved Analysis Run 4/2/2021 11:43 AM



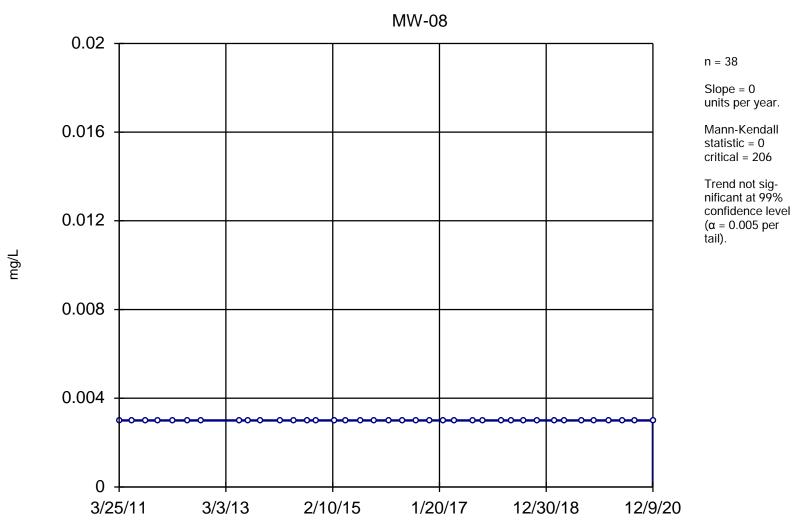
Constituent: Antimony, Dissolved Analysis Run 4/2/2021 11:43 AM



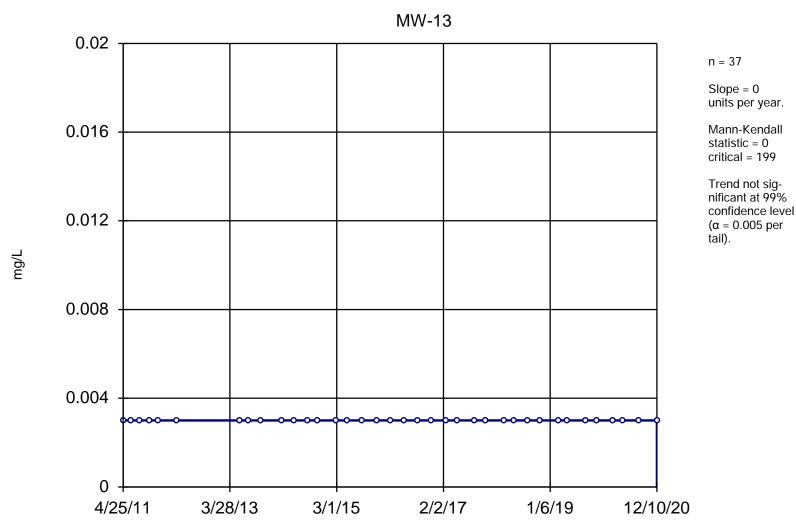
Constituent: Antimony, Dissolved Analysis Run 4/2/2021 11:43 AM



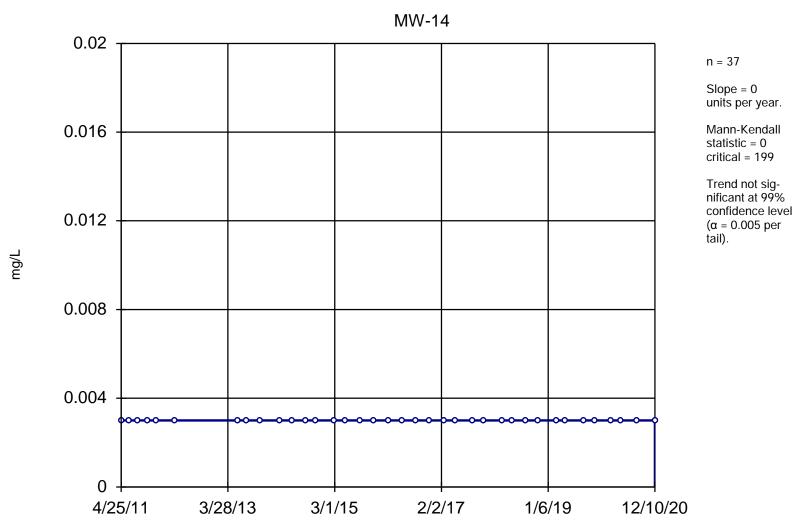
Constituent: Antimony, Dissolved Analysis Run 4/2/2021 11:43 AM



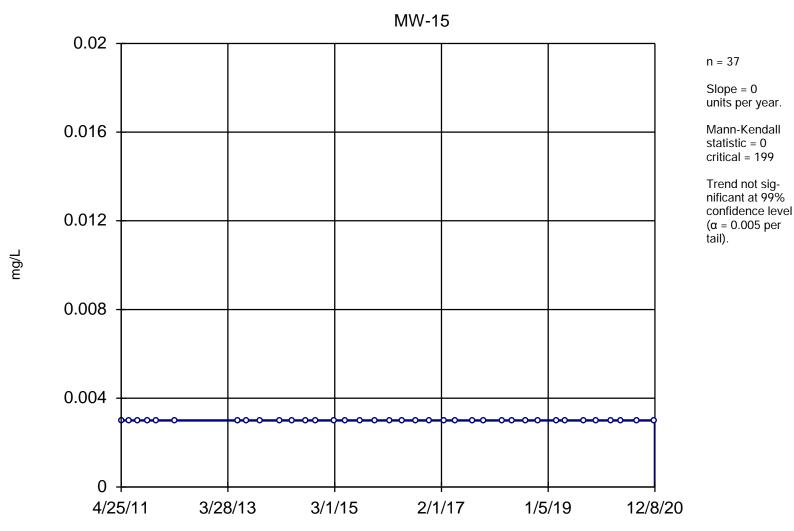
Constituent: Antimony, Dissolved Analysis Run 4/2/2021 11:43 AM



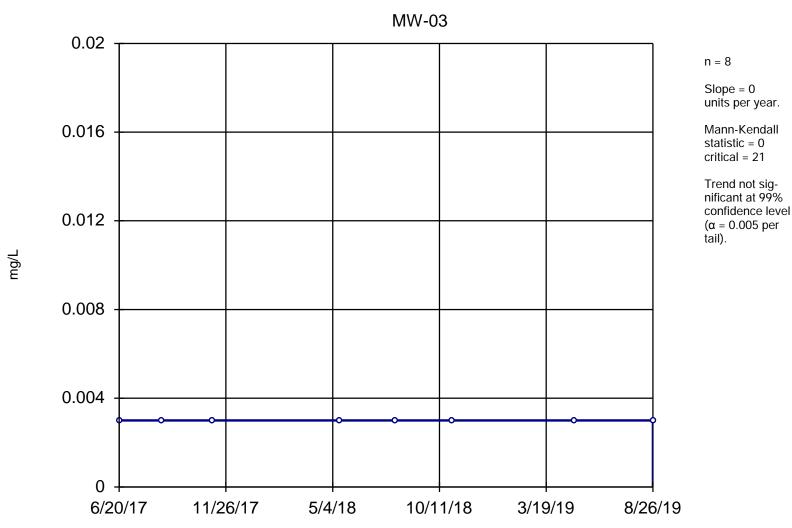
Constituent: Antimony, Dissolved Analysis Run 4/2/2021 11:43 AM



Constituent: Antimony, Dissolved Analysis Run 4/2/2021 11:43 AM
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

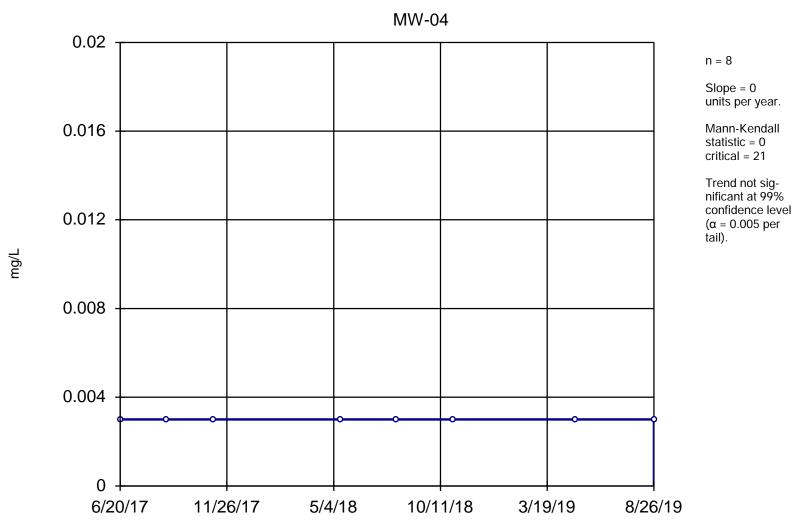


Constituent: Antimony, Dissolved Analysis Run 4/2/2021 11:43 AM

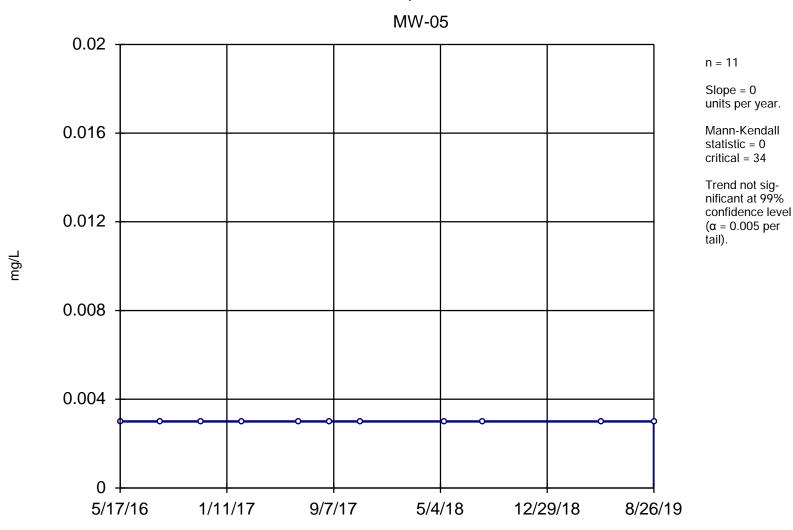


Constituent: Antimony, Total Analysis Run 4/2/2021 11:43 AM

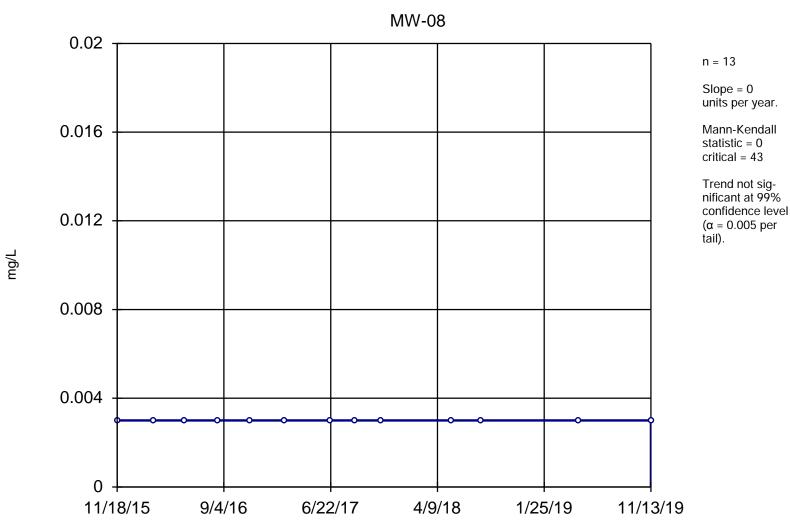
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



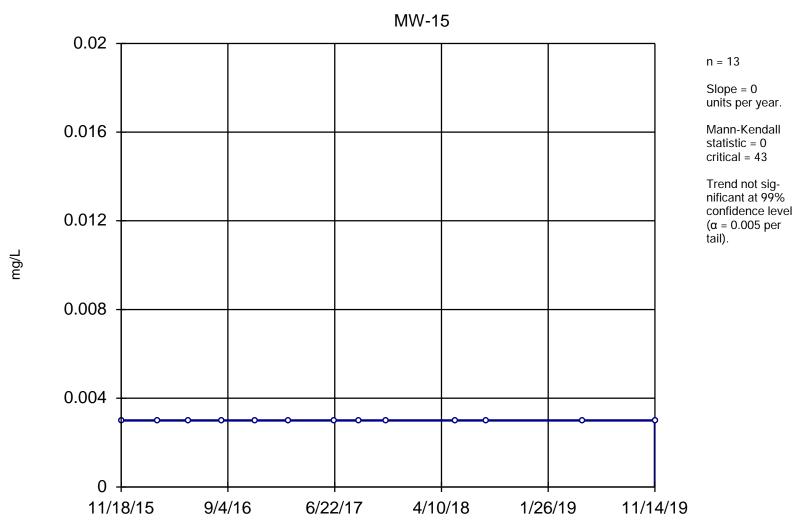
Constituent: Antimony, Total Analysis Run 4/2/2021 11:43 AM



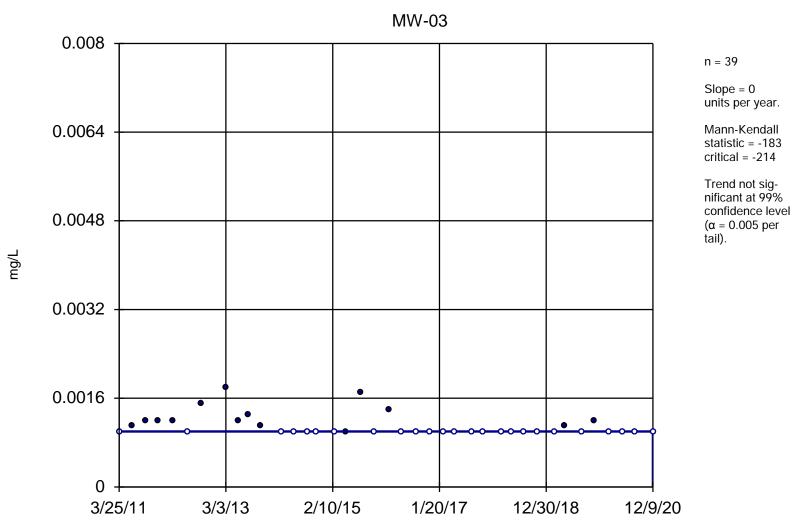
Constituent: Antimony, Total Analysis Run 4/2/2021 11:43 AM



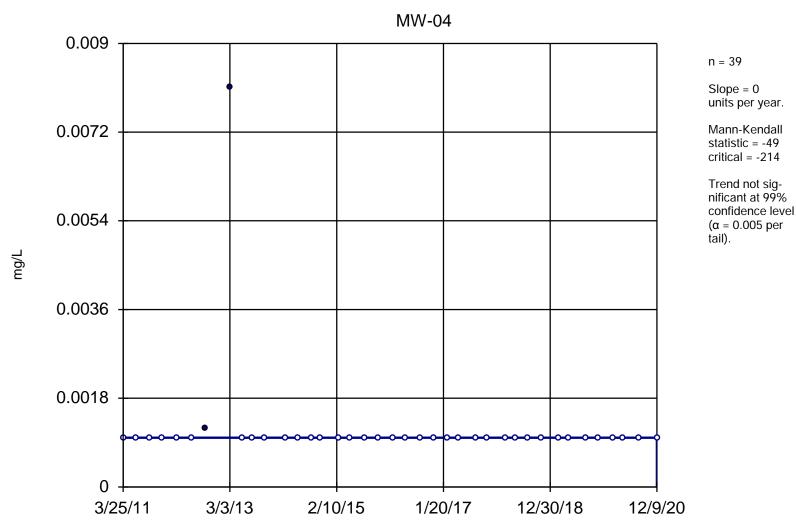
Constituent: Antimony, Total Analysis Run 4/2/2021 11:43 AM



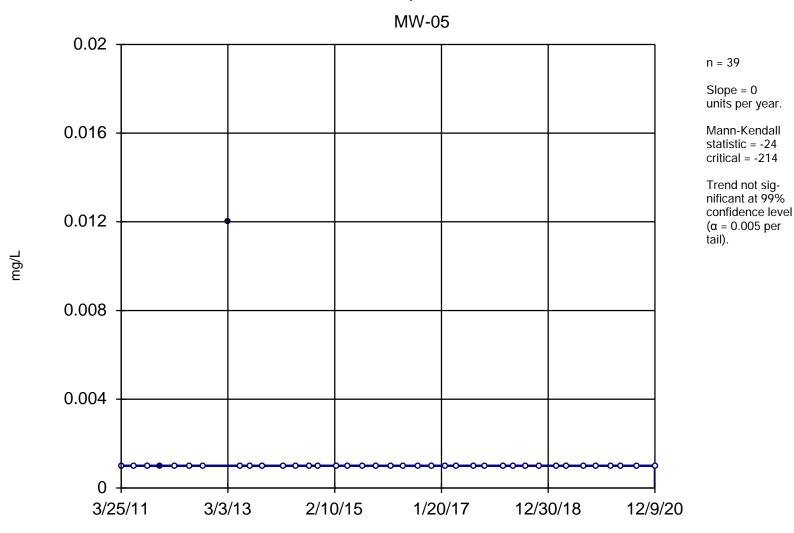
Constituent: Antimony, Total Analysis Run 4/2/2021 11:43 AM



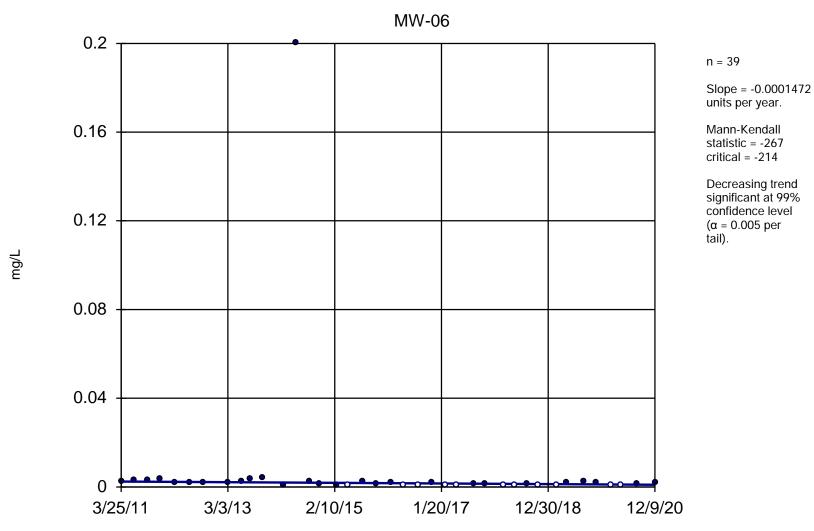
Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:43 AM



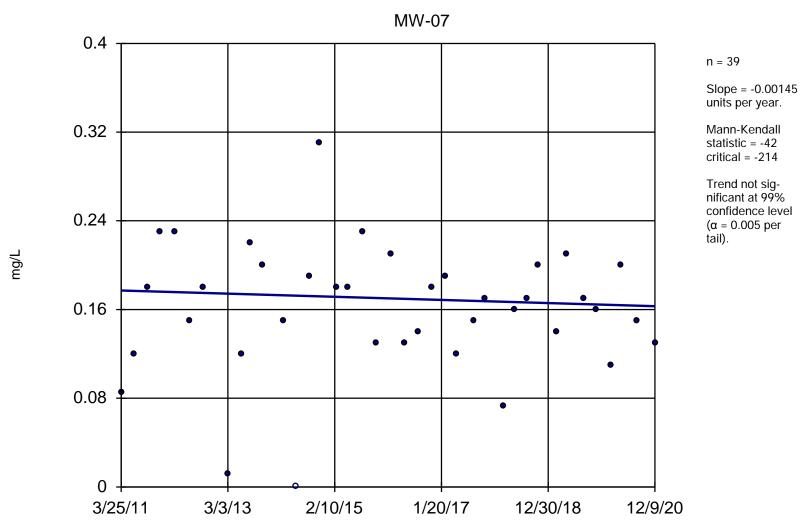
Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:43 AM



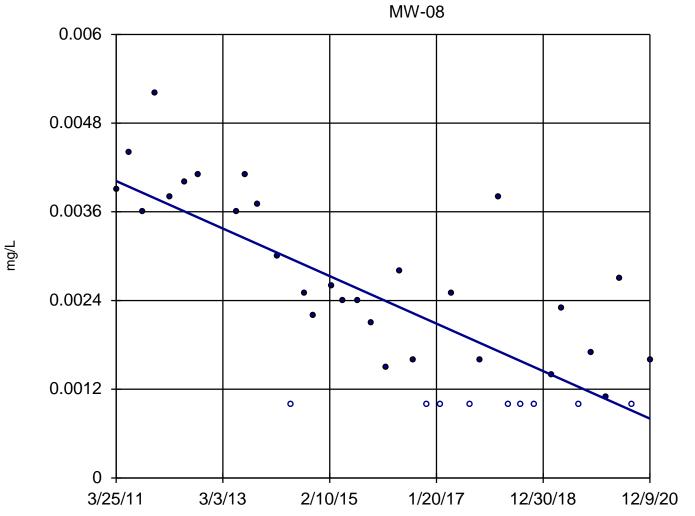
Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:43 AM



Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:43 AM



Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:43 AM



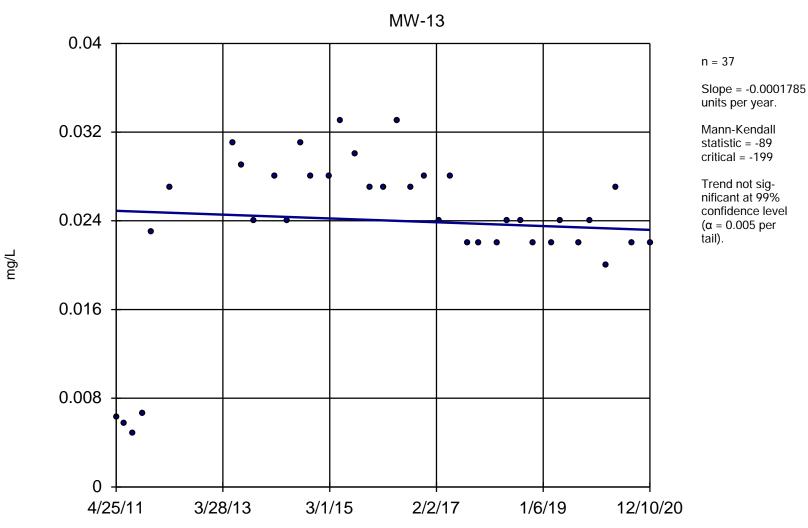
n = 38

Slope = -0.0003309 units per year.

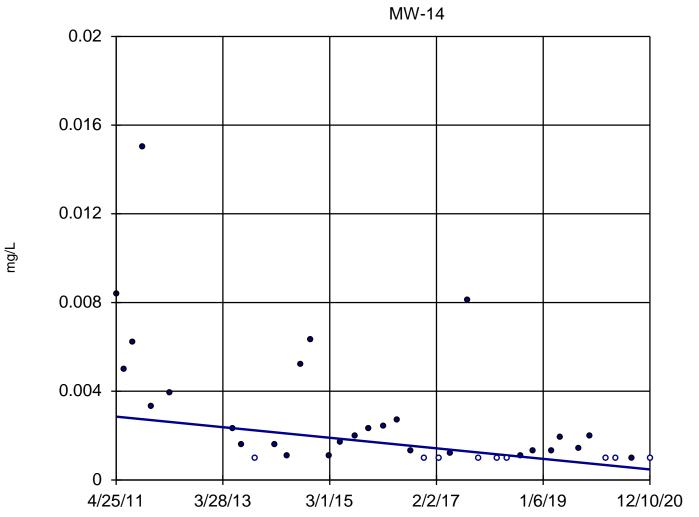
Mann-Kendall statistic = -365 critical = -206

Decreasing trend significant at 99% confidence level ( $\alpha = 0.005$  per tail).

Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:43 AM



Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:44 AM



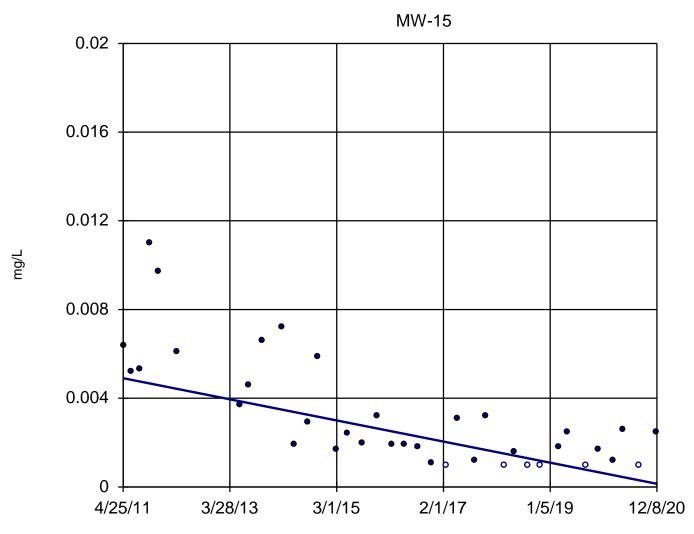
n = 37

Slope = -0.0002473 units per year.

Mann-Kendall statistic = -282 critical = -199

Decreasing trend significant at 99% confidence level ( $\alpha = 0.005$  per tail).

Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:44 AM



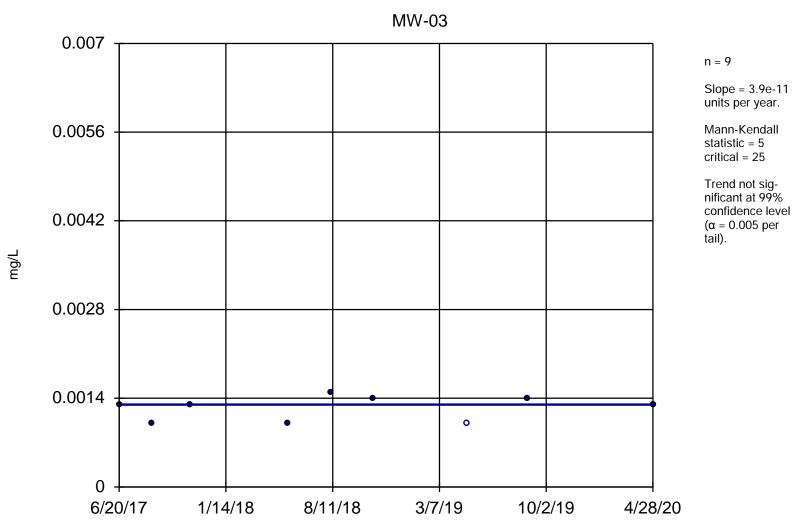
n = 37

Slope = -0.0004945 units per year.

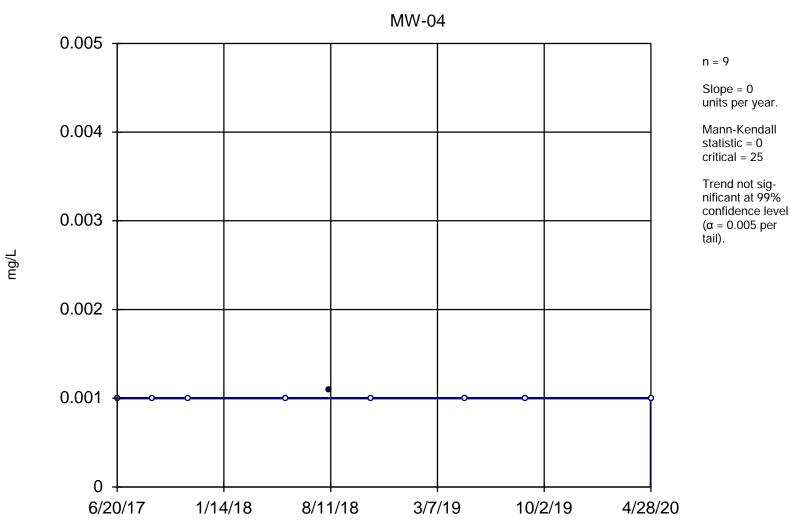
Mann-Kendall statistic = -353 critical = -199

Decreasing trend significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 11:44 AM

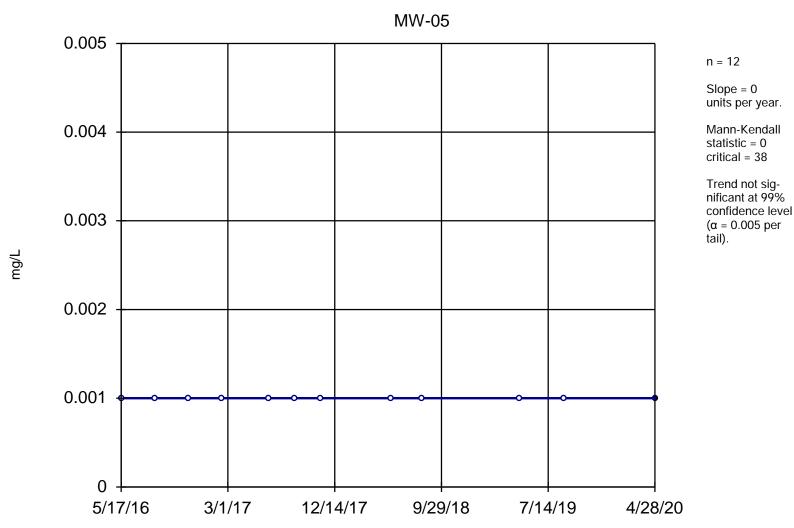


Constituent: Arsenic, Total Analysis Run 4/2/2021 11:44 AM

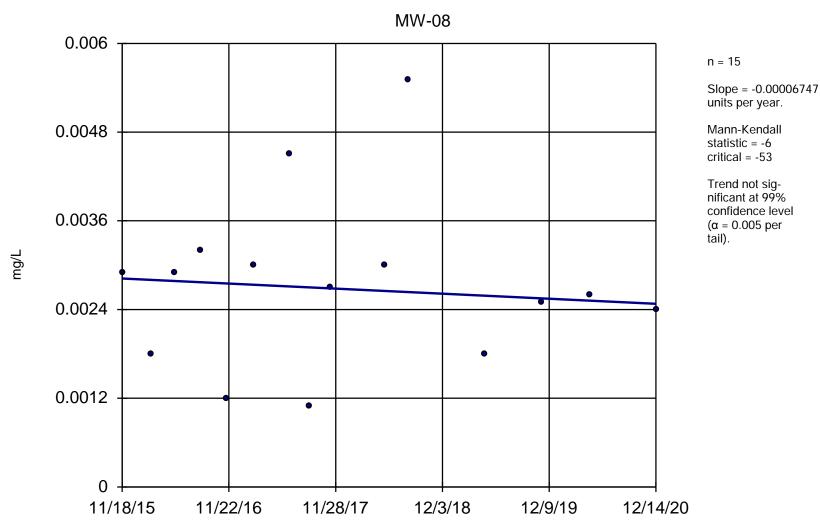


Constituent: Arsenic, Total Analysis Run 4/2/2021 11:44 AM

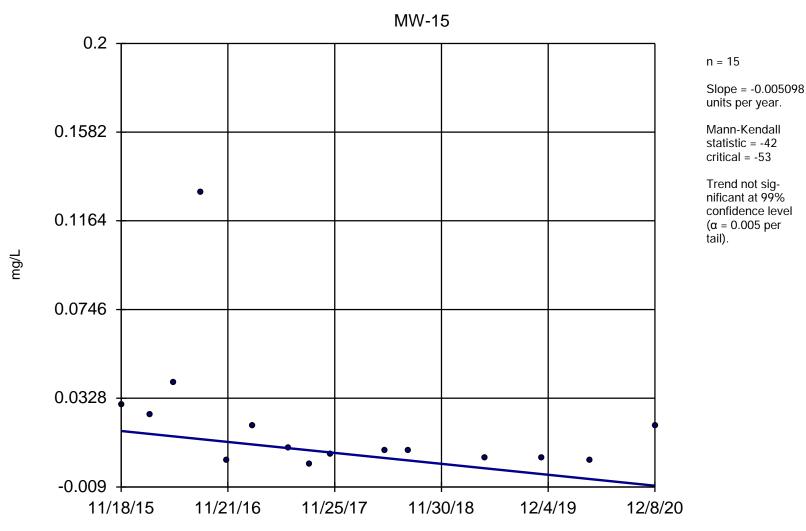
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



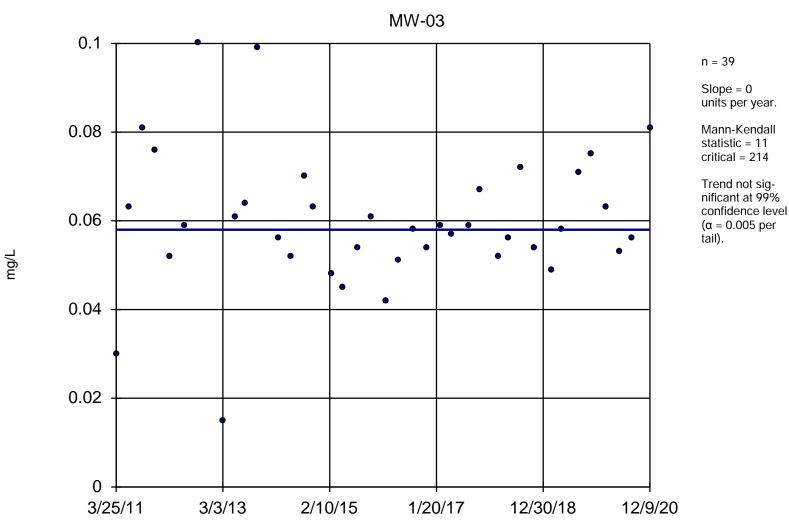
Constituent: Arsenic, Total Analysis Run 4/2/2021 11:44 AM



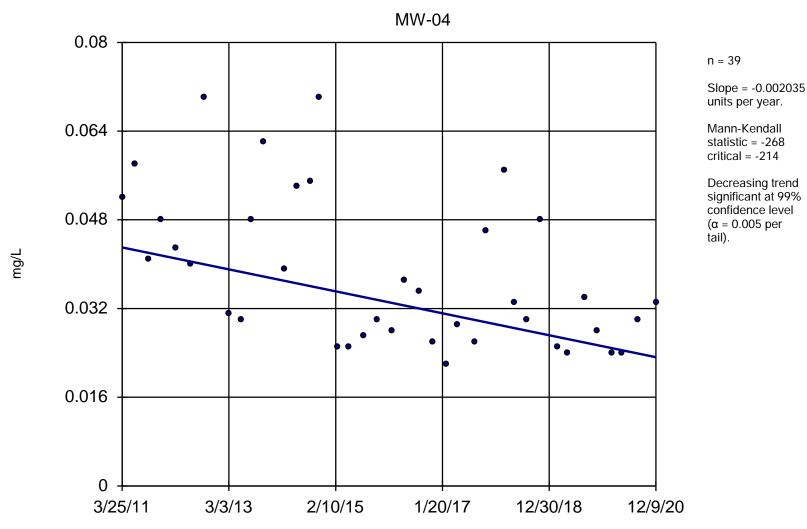
Constituent: Arsenic, Total Analysis Run 4/2/2021 11:44 AM



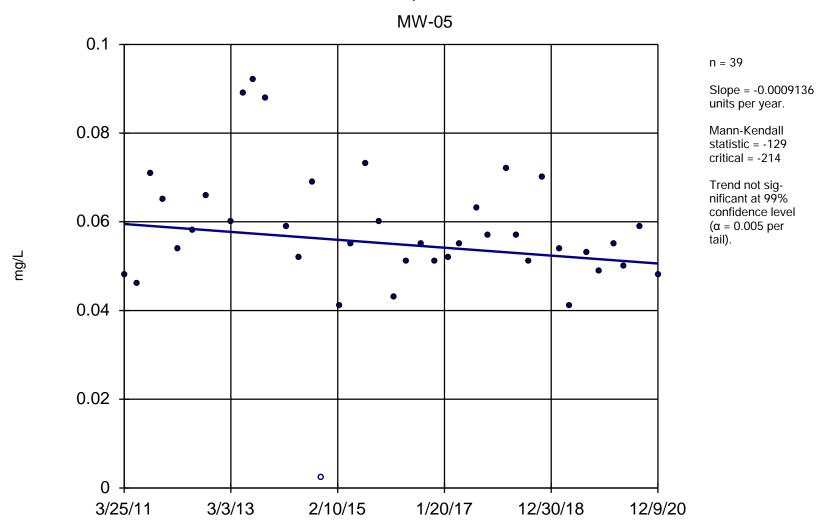
Constituent: Arsenic, Total Analysis Run 4/2/2021 11:44 AM



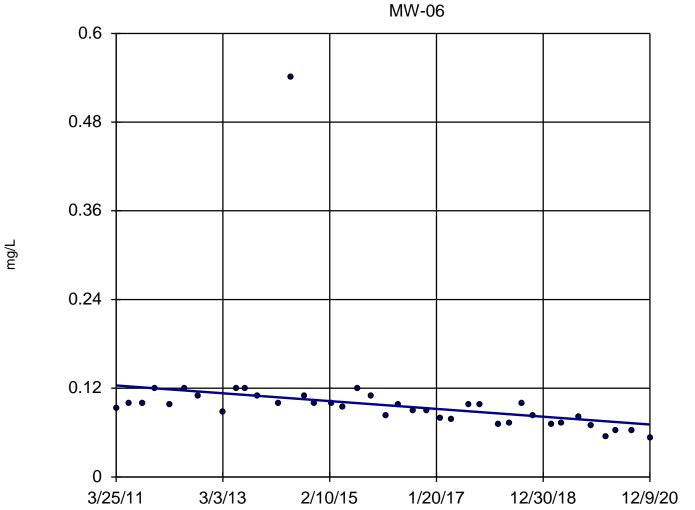
Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:44 AM



Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:44 AM



Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:44 AM



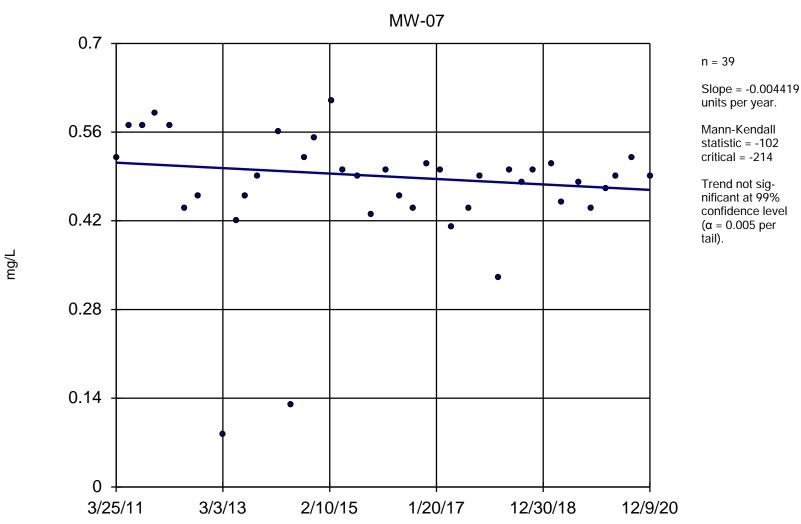
n = 39

Slope = -0.005435 units per year.

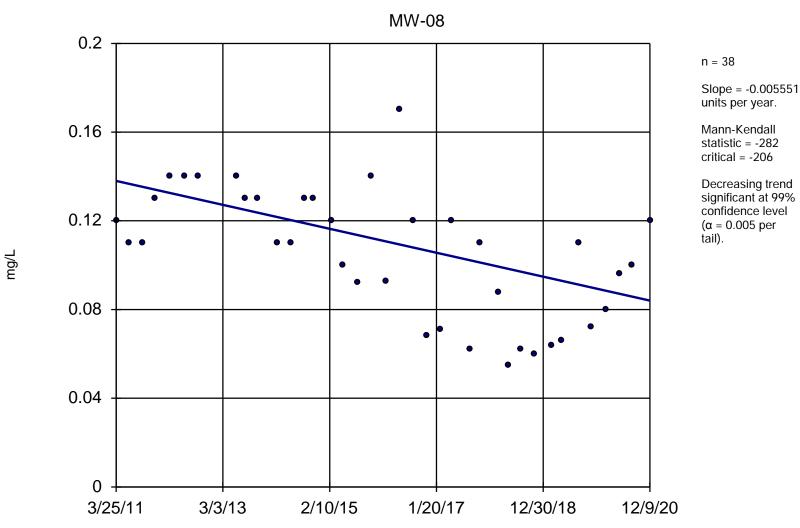
Mann-Kendall statistic = -431 critical = -214

Decreasing trend significant at 99% confidence level ( $\alpha = 0.005$  per tail).

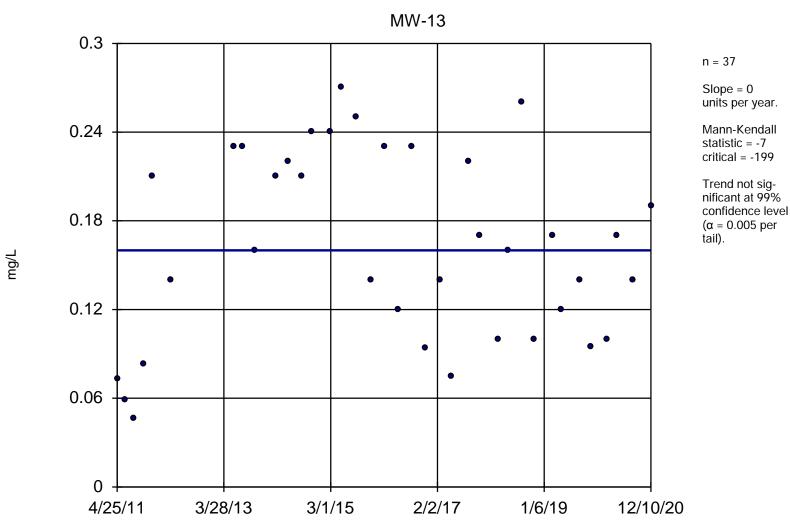
Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:44 AM



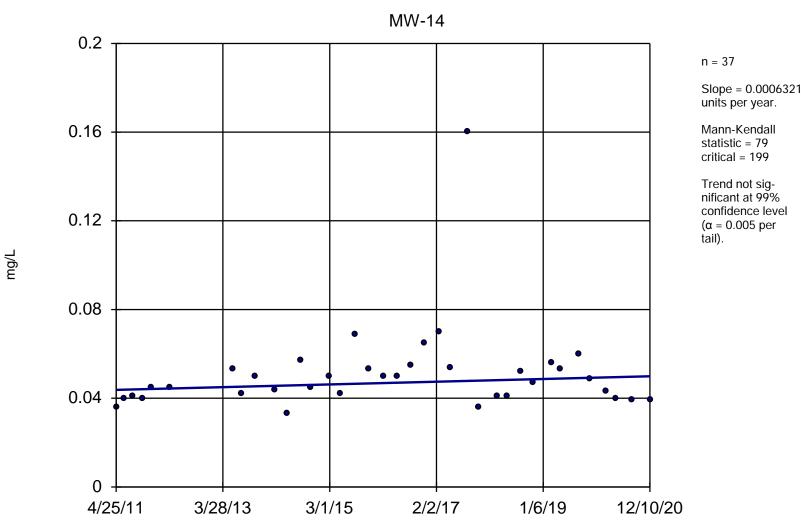
Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:44 AM



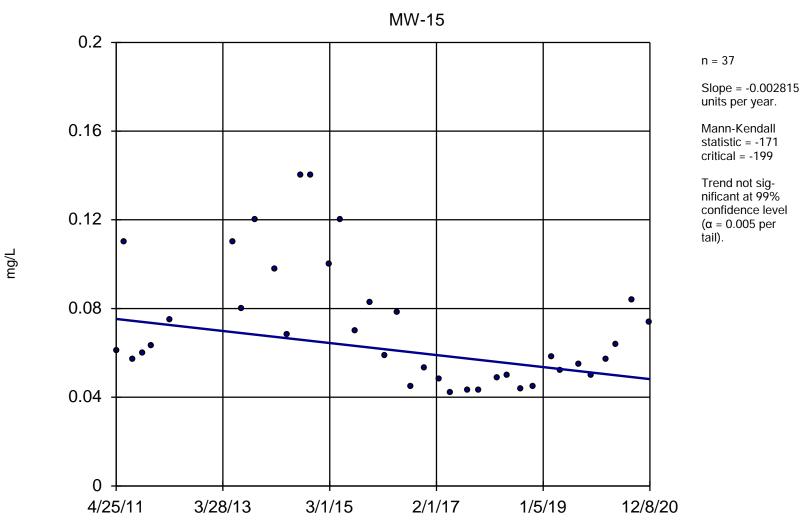
Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:44 AM



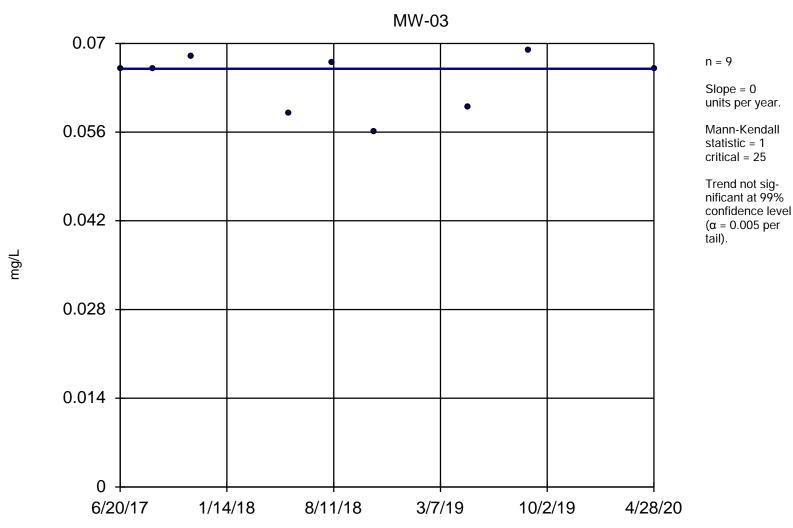
Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:44 AM



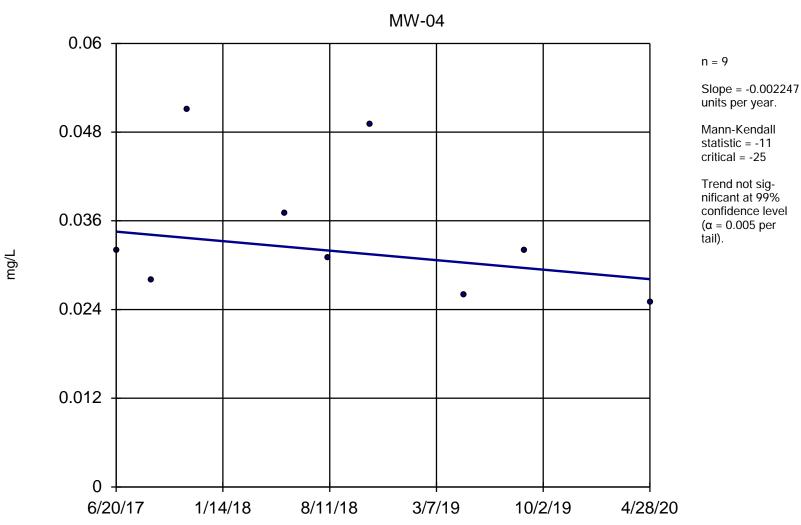
Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:44 AM



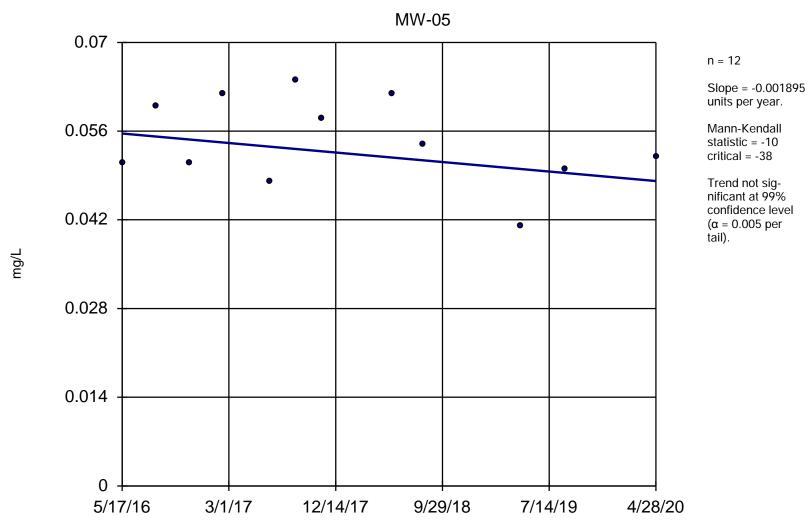
Constituent: Barium, Dissolved Analysis Run 4/2/2021 11:44 AM



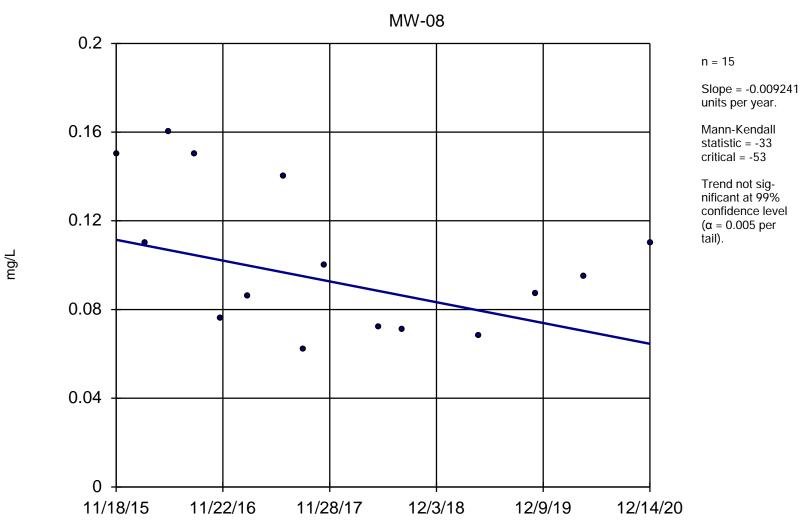
Constituent: Barium, Total Analysis Run 4/2/2021 11:44 AM



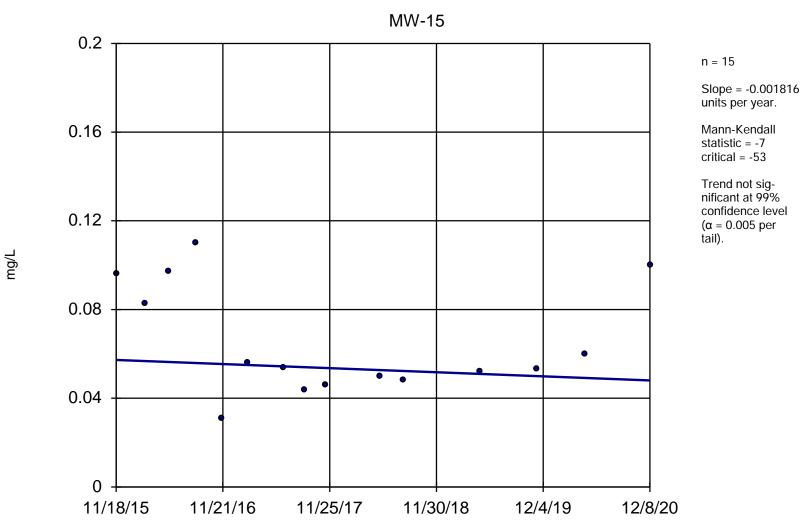
Constituent: Barium, Total Analysis Run 4/2/2021 11:44 AM



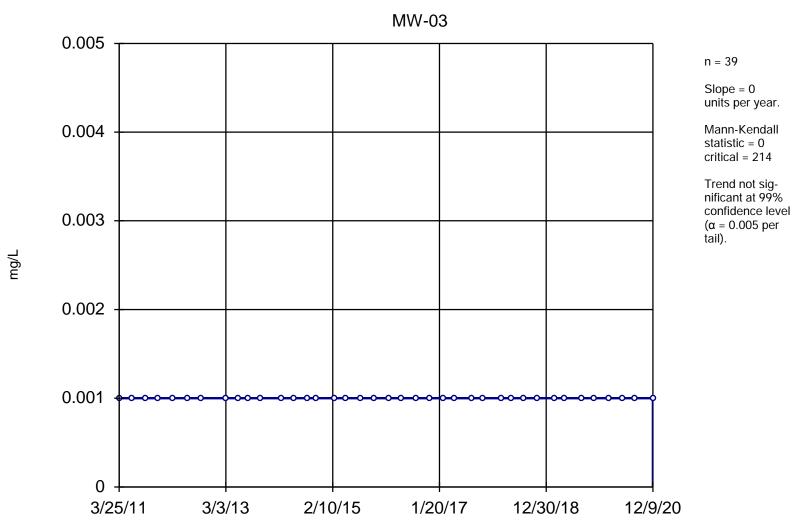
Constituent: Barium, Total Analysis Run 4/2/2021 11:44 AM



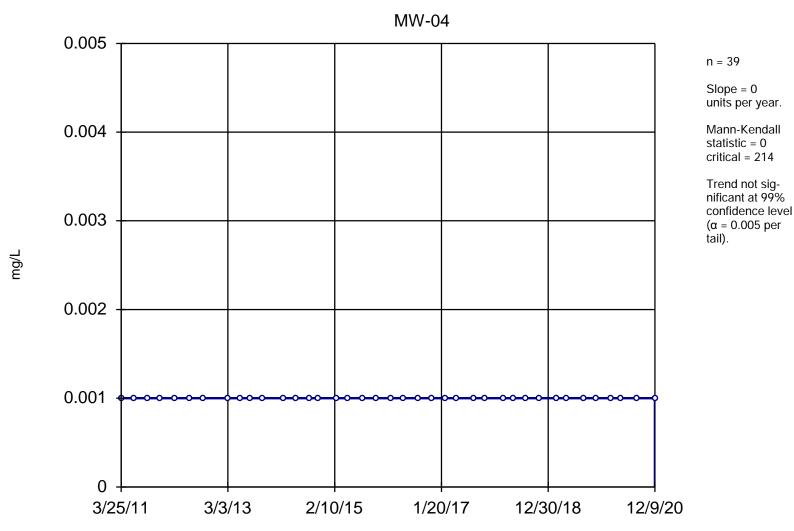
Constituent: Barium, Total Analysis Run 4/2/2021 11:44 AM



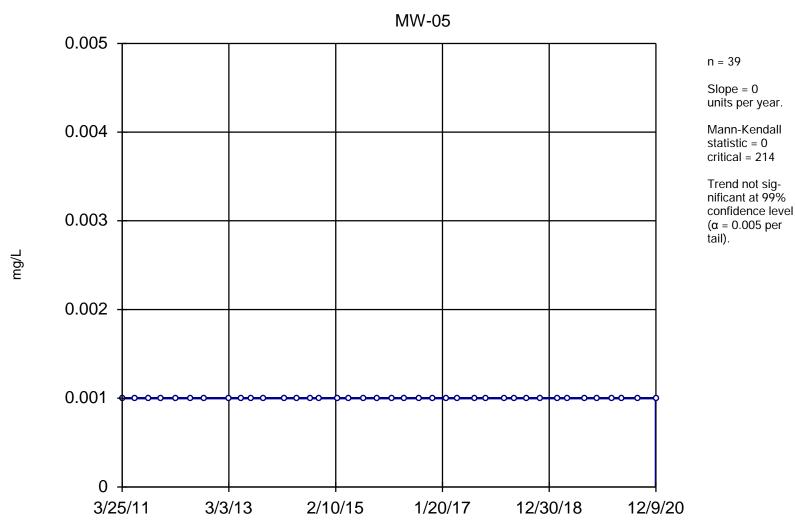
Constituent: Barium, Total Analysis Run 4/2/2021 11:44 AM



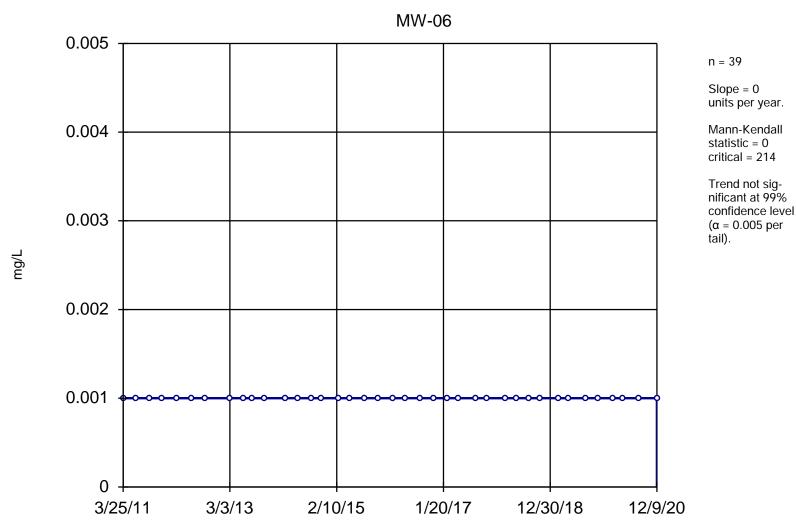
Constituent: Beryllium, Dissolved Analysis Run 4/2/2021 11:44 AM



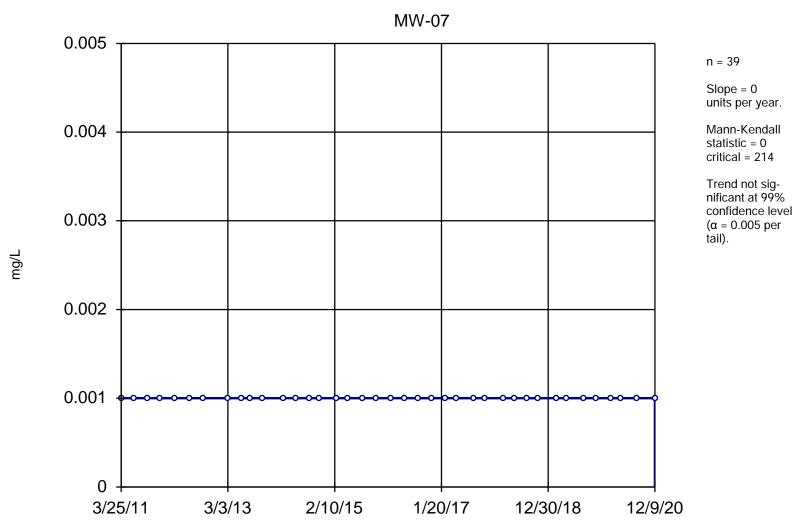
Constituent: Beryllium, Dissolved Analysis Run 4/2/2021 11:44 AM



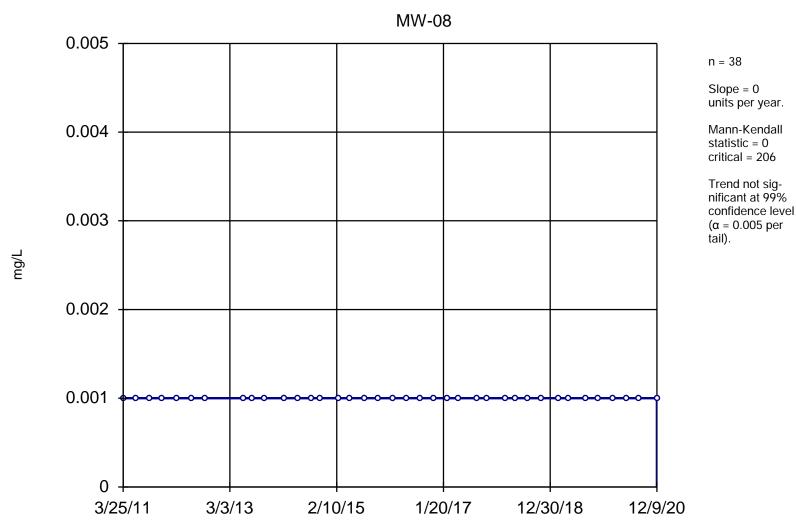
Constituent: Beryllium, Dissolved Analysis Run 4/2/2021 11:44 AM



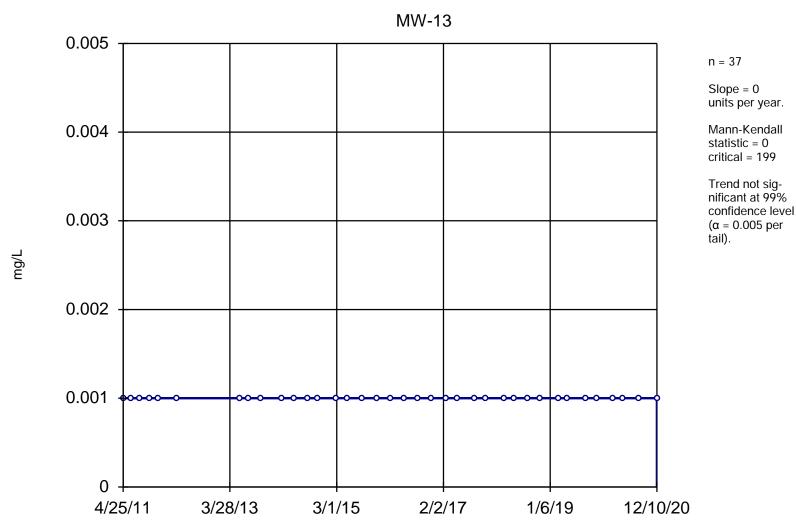
Constituent: Beryllium, Dissolved Analysis Run 4/2/2021 11:44 AM



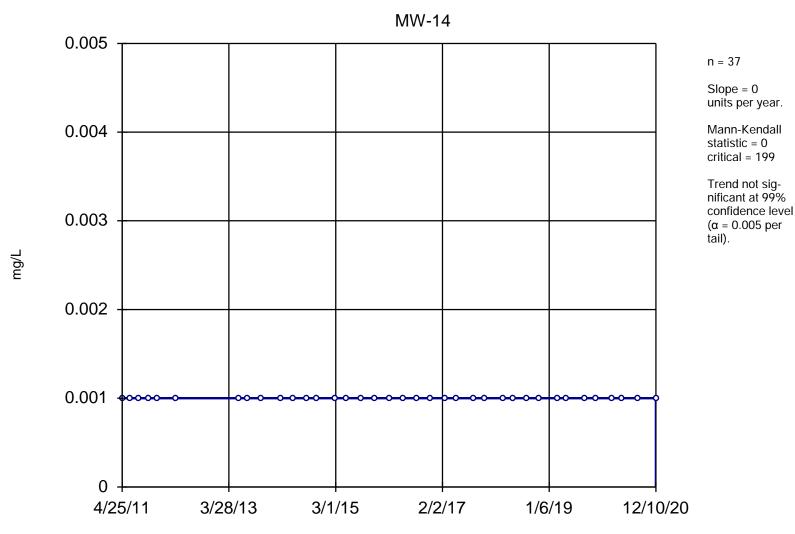
Constituent: Beryllium, Dissolved Analysis Run 4/2/2021 11:44 AM



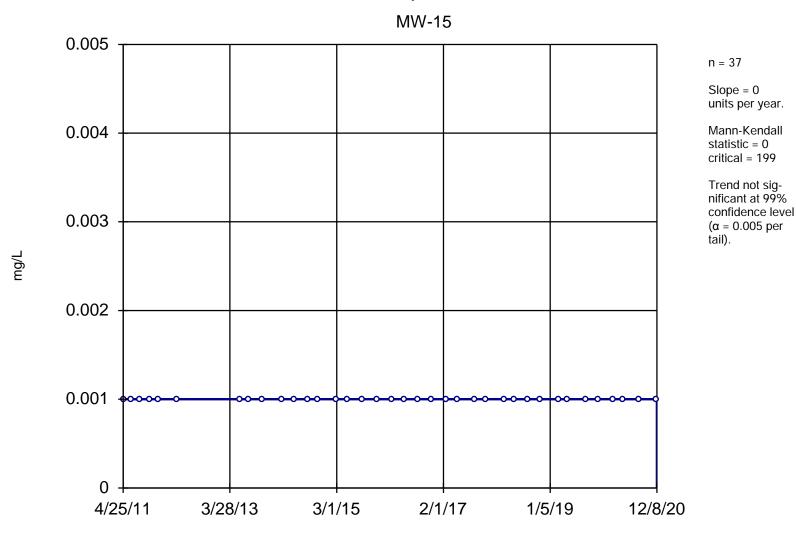
Constituent: Beryllium, Dissolved Analysis Run 4/2/2021 11:44 AM



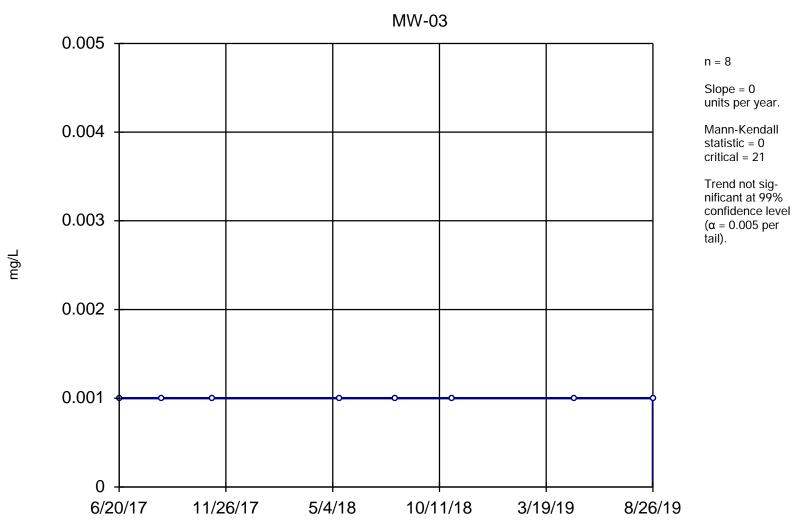
Constituent: Beryllium, Dissolved Analysis Run 4/2/2021 11:44 AM



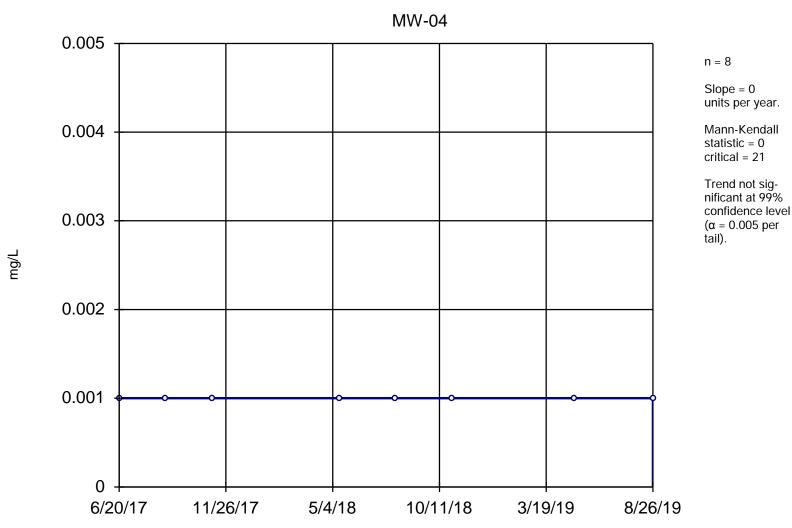
Constituent: Beryllium, Dissolved Analysis Run 4/2/2021 11:44 AM



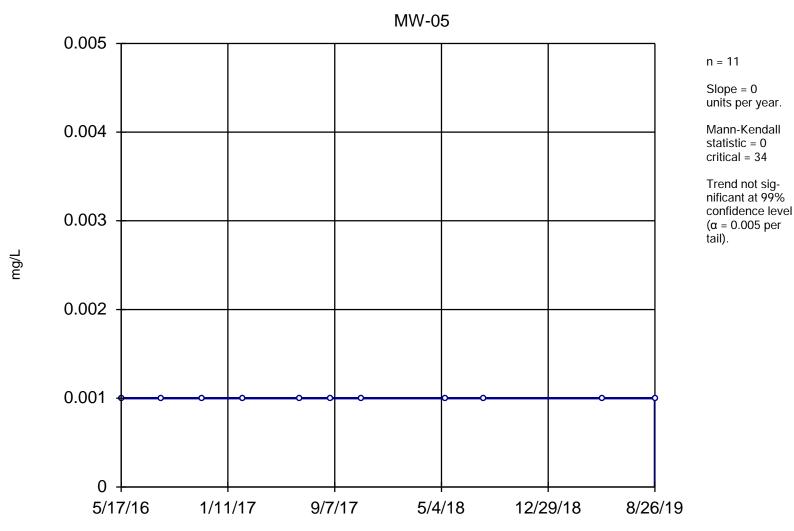
Constituent: Beryllium, Dissolved Analysis Run 4/2/2021 11:44 AM



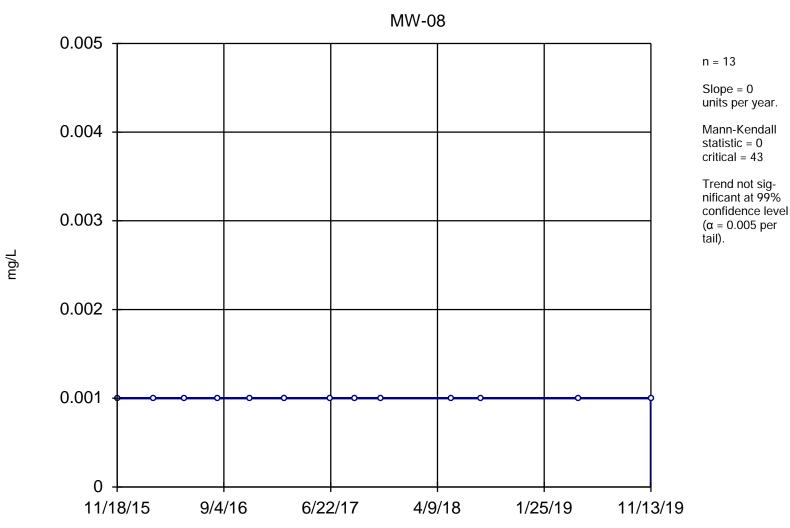
Constituent: Beryllium, Total Analysis Run 4/2/2021 11:44 AM



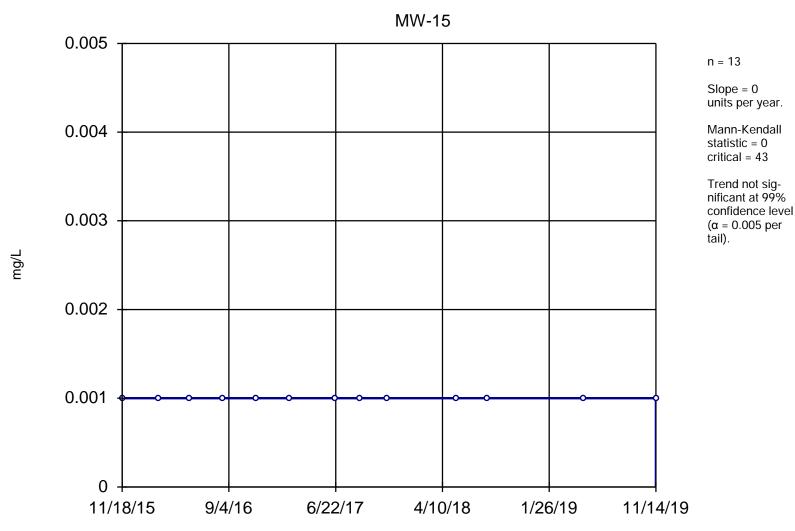
Constituent: Beryllium, Total Analysis Run 4/2/2021 11:44 AM



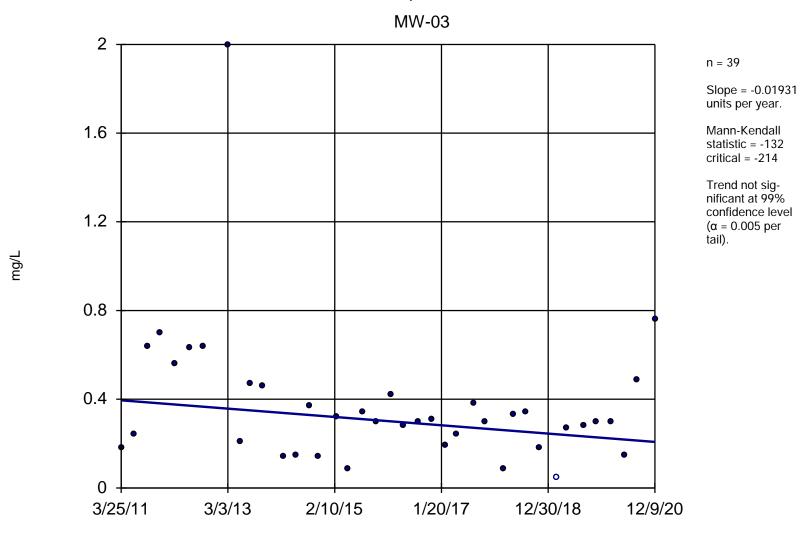
Constituent: Beryllium, Total Analysis Run 4/2/2021 11:44 AM



Constituent: Beryllium, Total Analysis Run 4/2/2021 11:44 AM



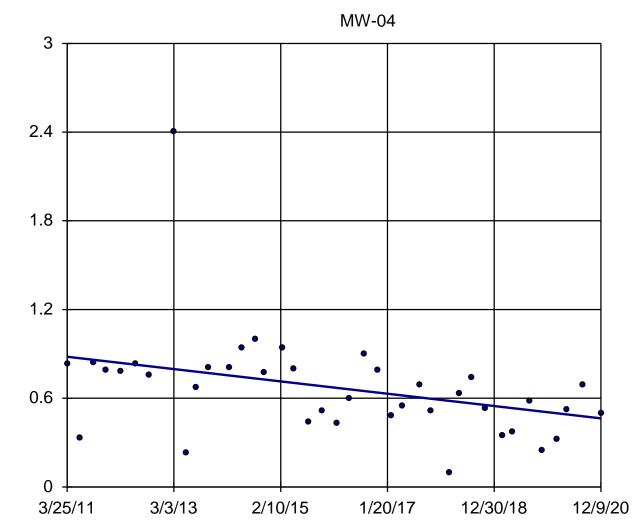
Constituent: Beryllium, Total Analysis Run 4/2/2021 11:44 AM



Constituent: Boron, Dissolved Analysis Run 4/2/2021 11:44 AM

mg/L

## Sen's Slope Estimator



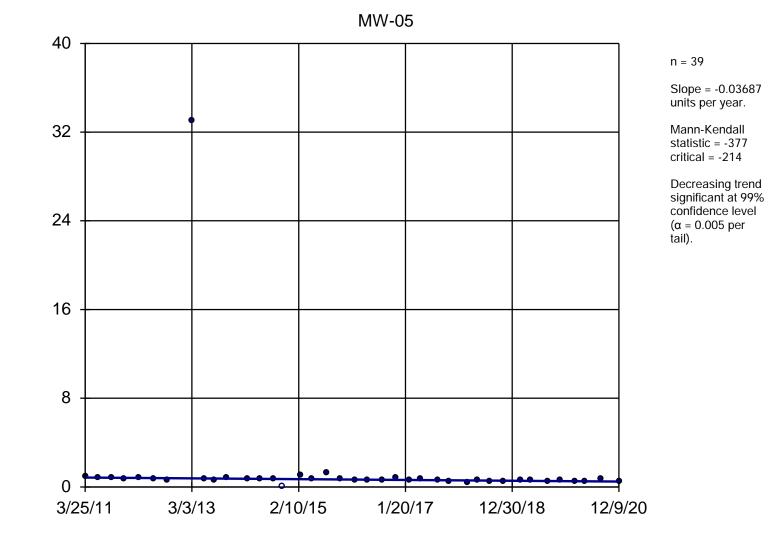
n = 39

Slope = -0.04286 units per year.

Mann-Kendall statistic = -267 critical = -214

Decreasing trend significant at 99% confidence level ( $\alpha = 0.005$  per tail).

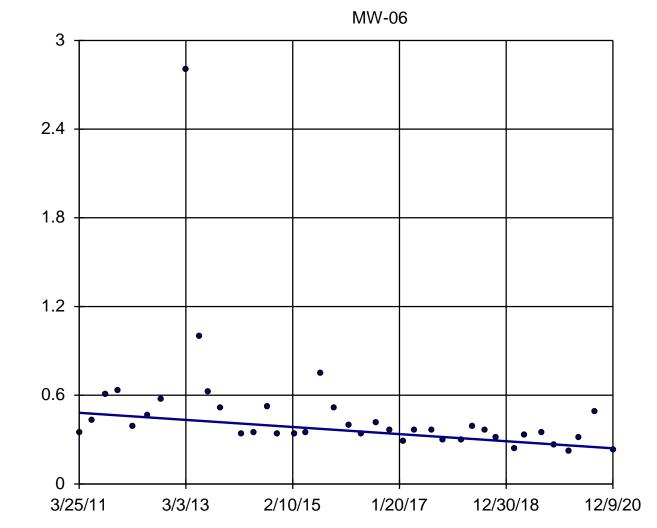
Constituent: Boron, Dissolved Analysis Run 4/2/2021 11:44 AM



Constituent: Boron, Dissolved Analysis Run 4/2/2021 11:44 AM

mg/L

## Sen's Slope Estimator



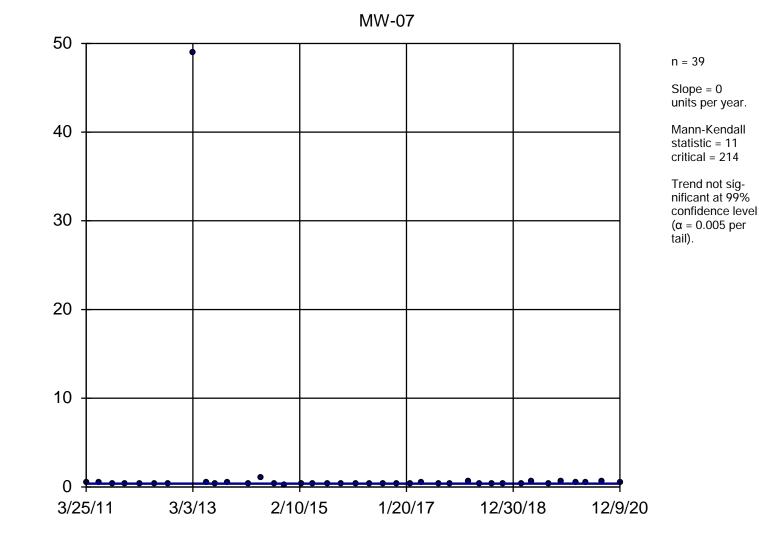
n = 39

Slope = -0.0247 units per year.

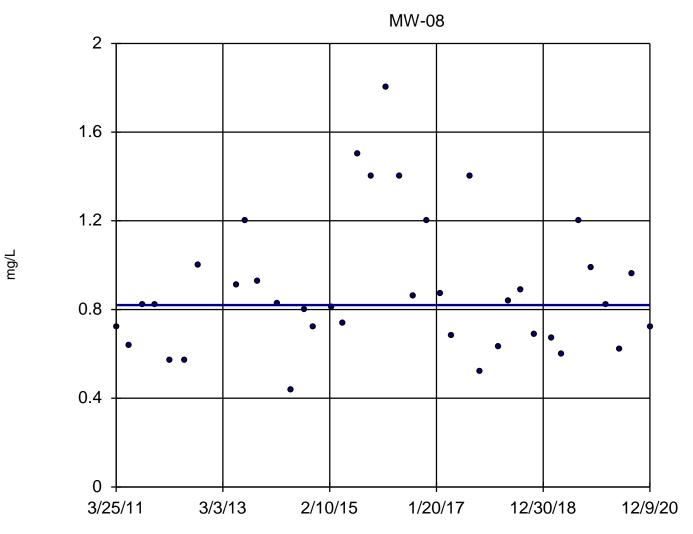
Mann-Kendall statistic = -339 critical = -214

Decreasing trend significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

Constituent: Boron, Dissolved Analysis Run 4/2/2021 11:44 AM



Constituent: Boron, Dissolved Analysis Run 4/2/2021 11:44 AM



Constituent: Boron, Dissolved Analysis Run 4/2/2021 11:44 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

n = 38

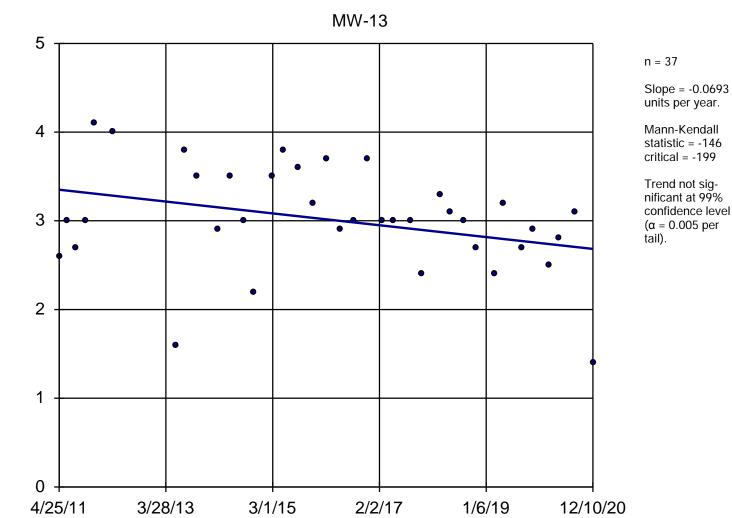
Slope = 0 units per year.

Mann-Kendall statistic = 12 critical = 206

Trend not significant at 99% confidence level

 $(\alpha = 0.005 \text{ per})$ 

tail).

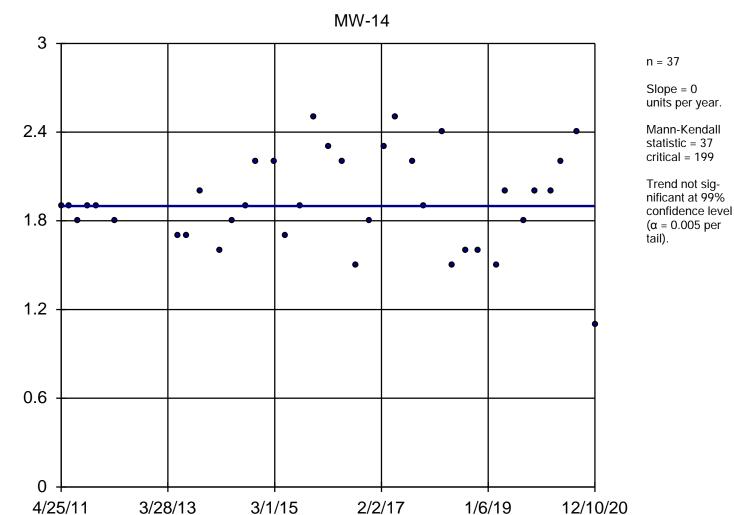


Constituent: Boron, Dissolved Analysis Run 4/2/2021 11:44 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

mg/L

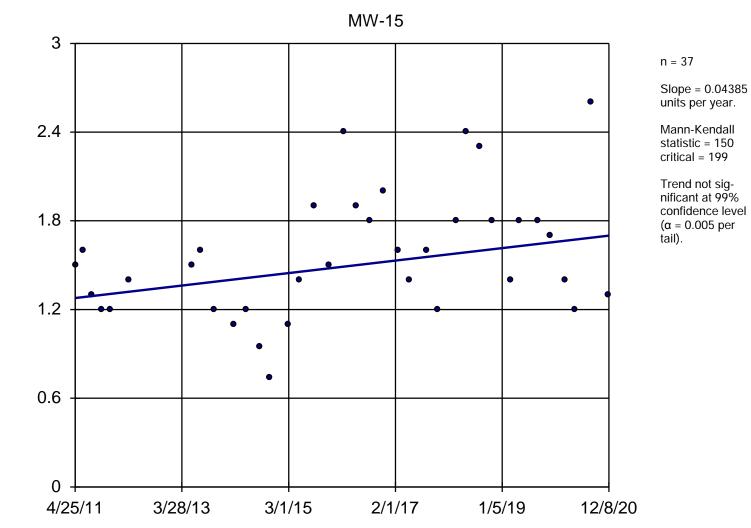
# Sen's Slope Estimator



Constituent: Boron, Dissolved Analysis Run 4/2/2021 11:44 AM

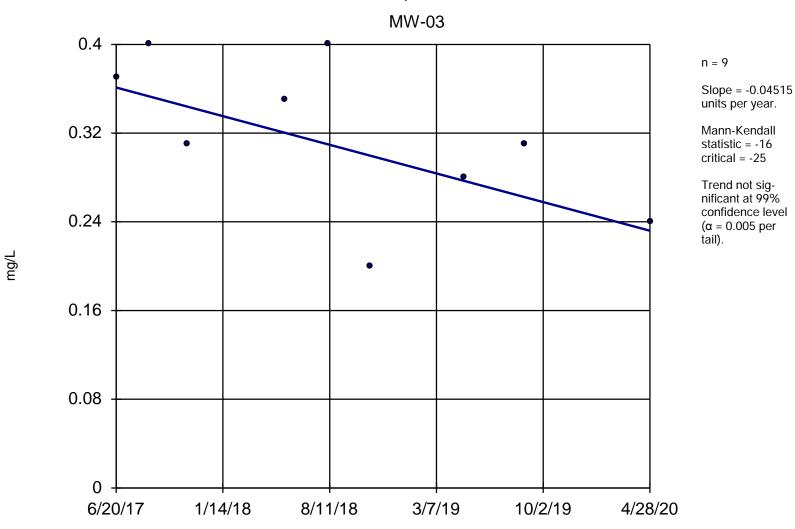
mg/L

## Sen's Slope Estimator



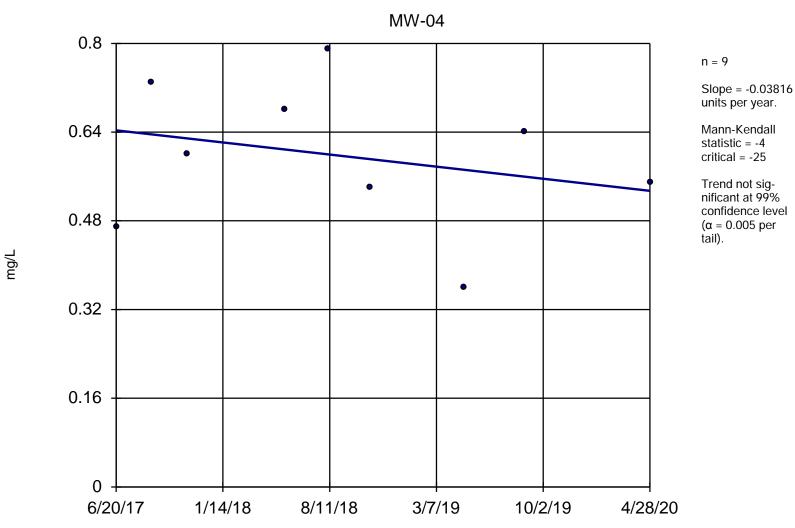
Constituent: Boron, Dissolved Analysis Run 4/2/2021 11:44 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



Constituent: Boron, Total Analysis Run 4/2/2021 11:44 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

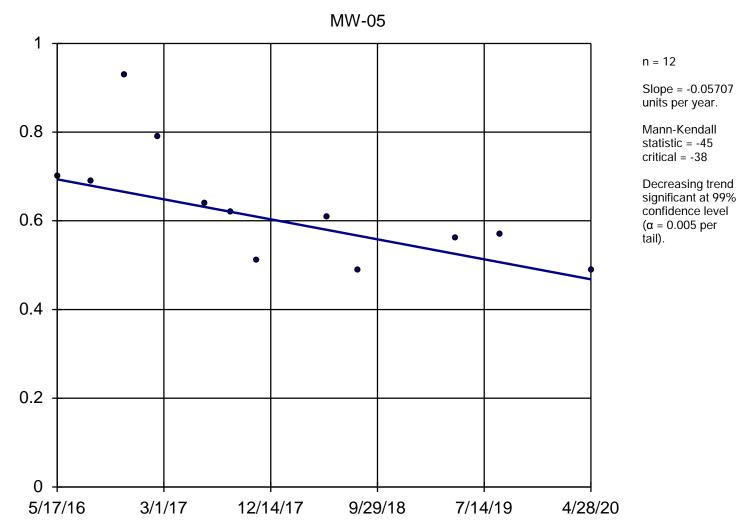


Constituent: Boron, Total Analysis Run 4/2/2021 11:44 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

mg/L

## Sen's Slope Estimator



Constituent: Boron, Total Analysis Run 4/2/2021 11:44 AM

Client: Weaver Consultants Group Utility Site P Data: Powerton Sanitas Database

Slope = -0.05707

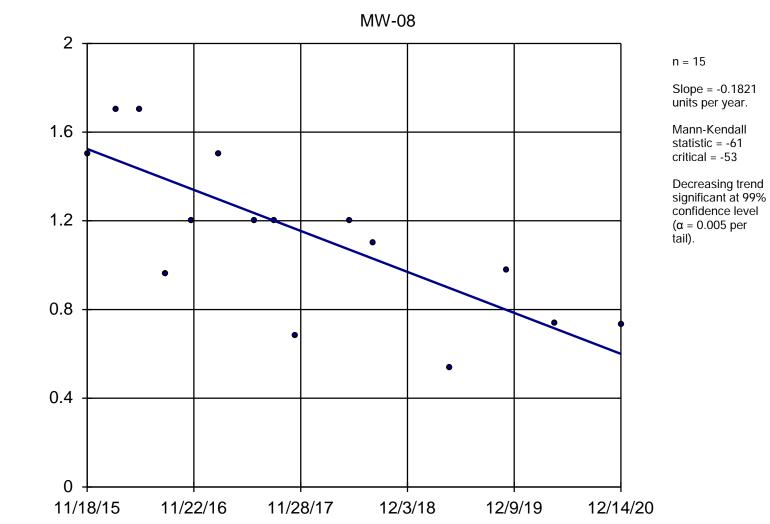
Mann-Kendall statistic = -45

confidence level

 $(\alpha = 0.005 \text{ per})$ 

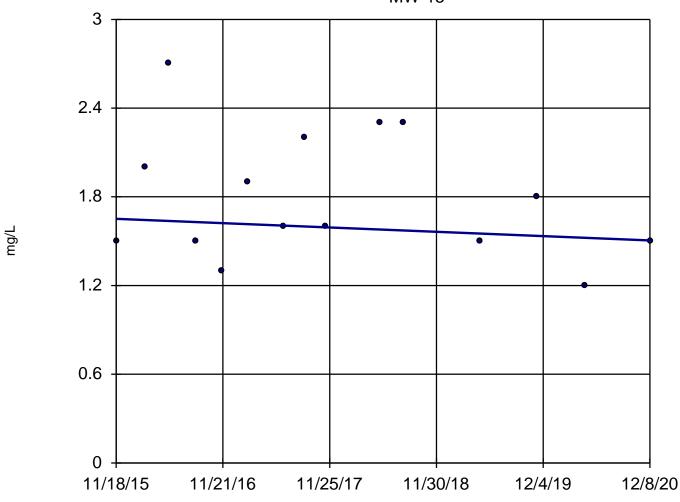
mg/L

## Sen's Slope Estimator



Constituent: Boron, Total Analysis Run 4/2/2021 11:44 AM





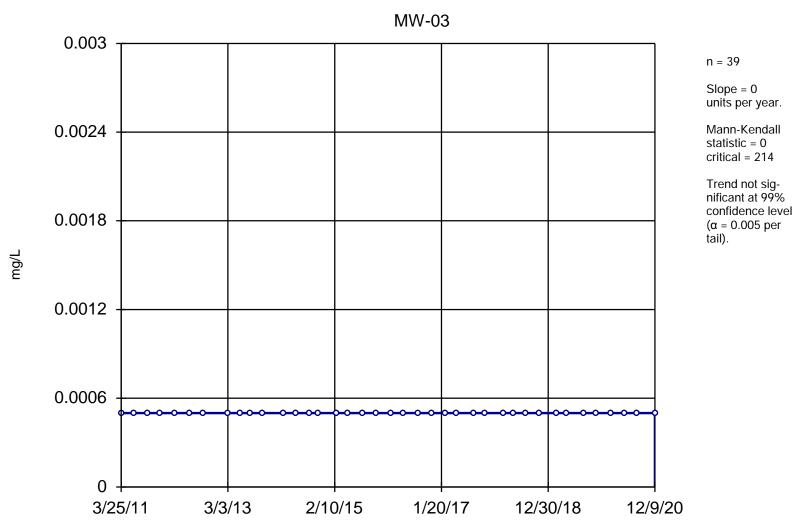
n = 15

Slope = -0.02899 units per year.

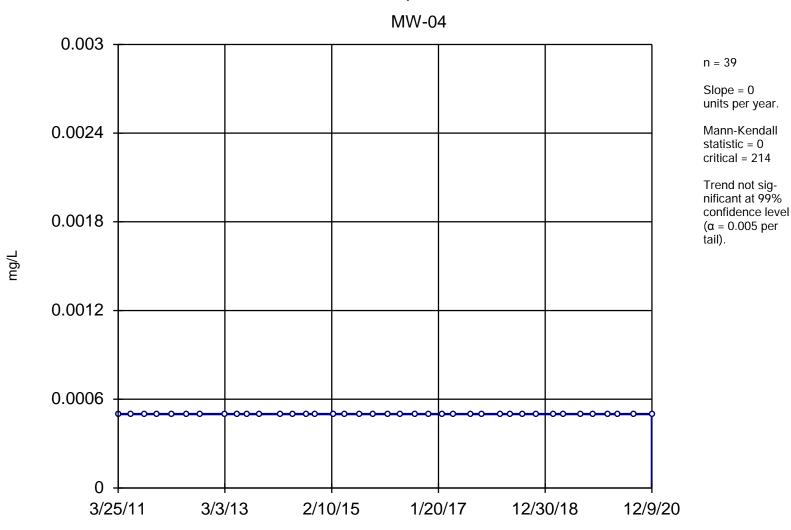
Mann-Kendall statistic = -11 critical = -53

Trend not significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

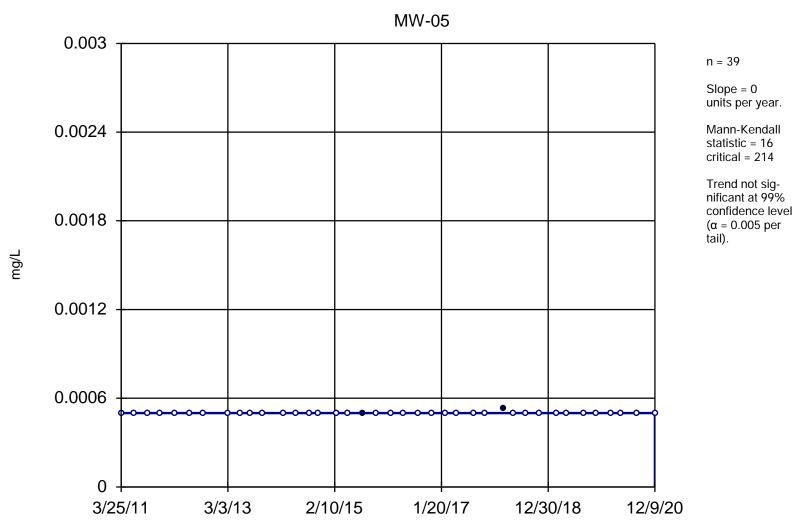
Constituent: Boron, Total Analysis Run 4/2/2021 11:44 AM



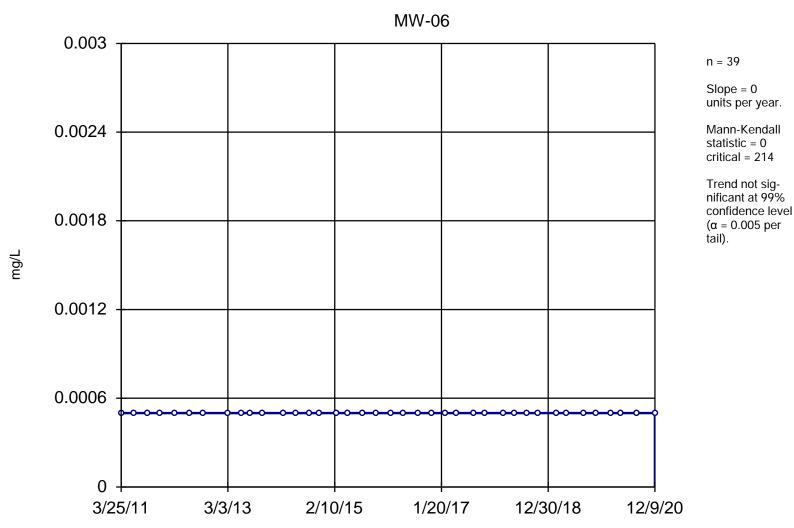
Constituent: Cadmium, Dissolved Analysis Run 4/2/2021 11:44 AM



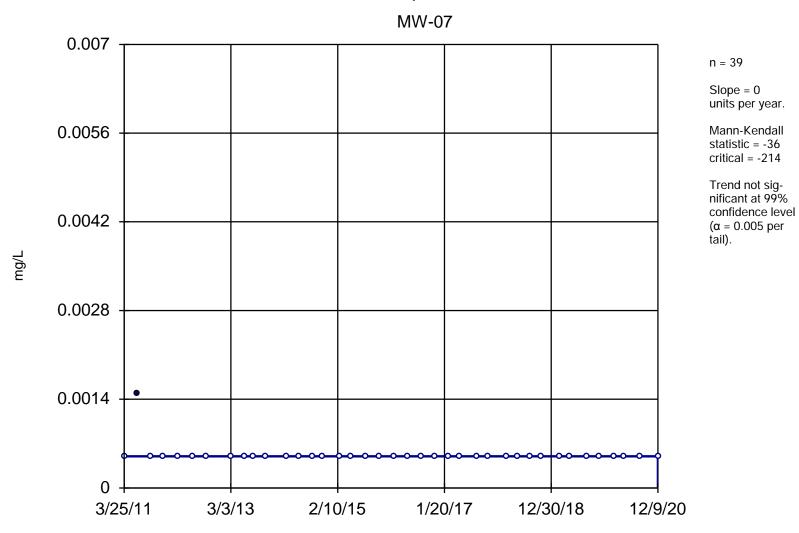
Constituent: Cadmium, Dissolved Analysis Run 4/2/2021 11:44 AM



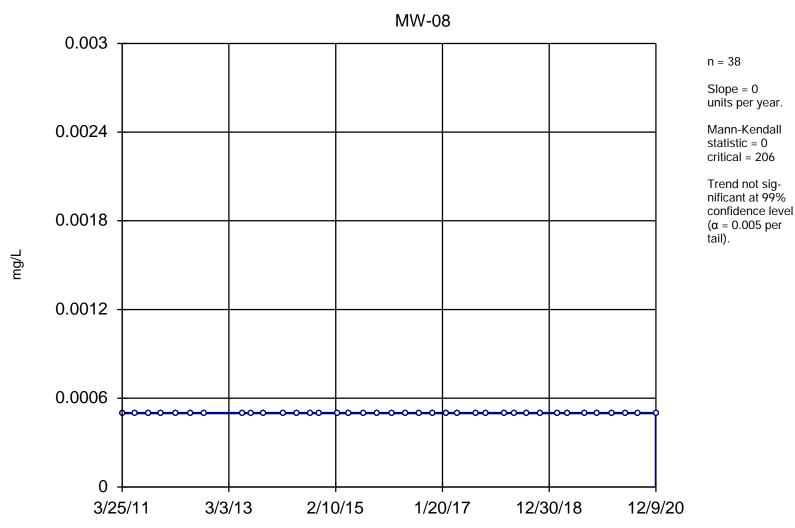
Constituent: Cadmium, Dissolved Analysis Run 4/2/2021 11:44 AM



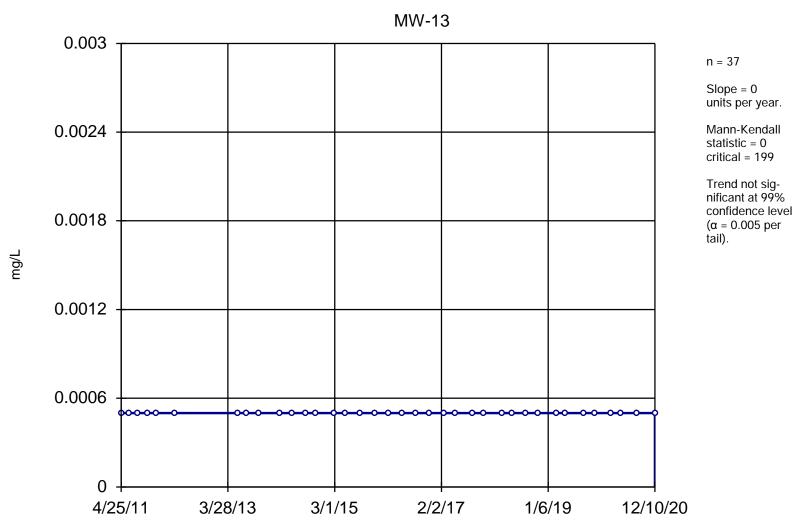
Constituent: Cadmium, Dissolved Analysis Run 4/2/2021 11:44 AM



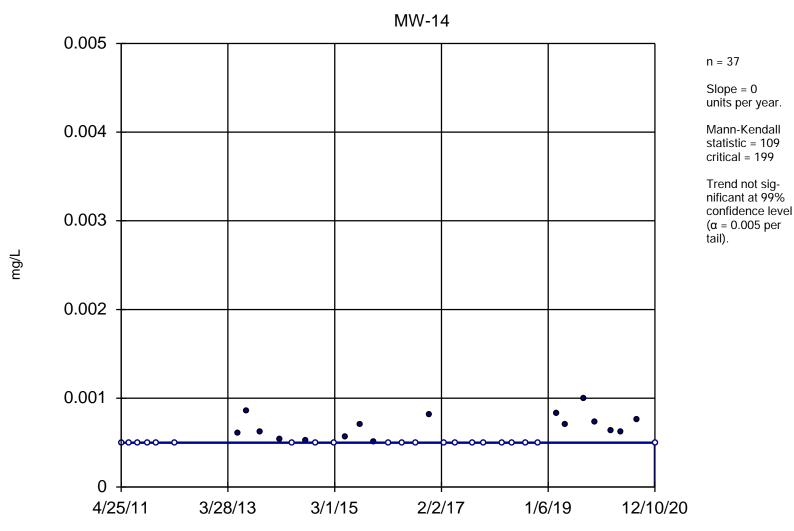
Constituent: Cadmium, Dissolved Analysis Run 4/2/2021 11:44 AM



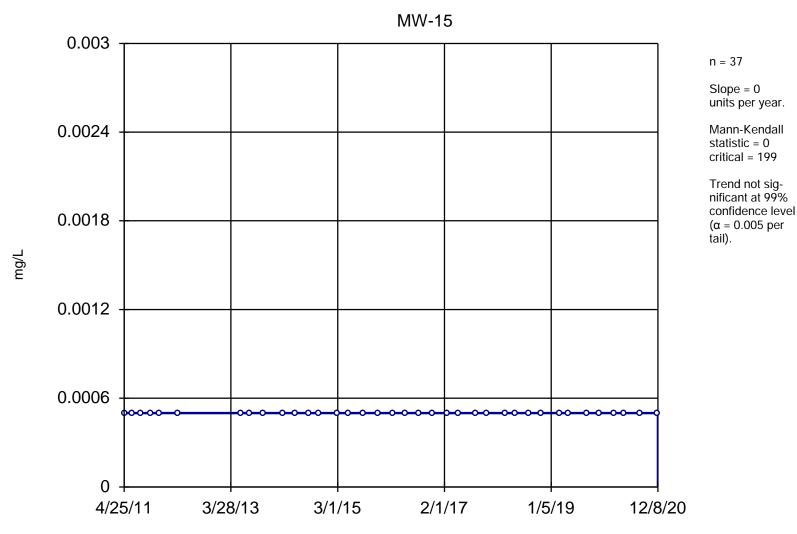
Constituent: Cadmium, Dissolved Analysis Run 4/2/2021 11:44 AM



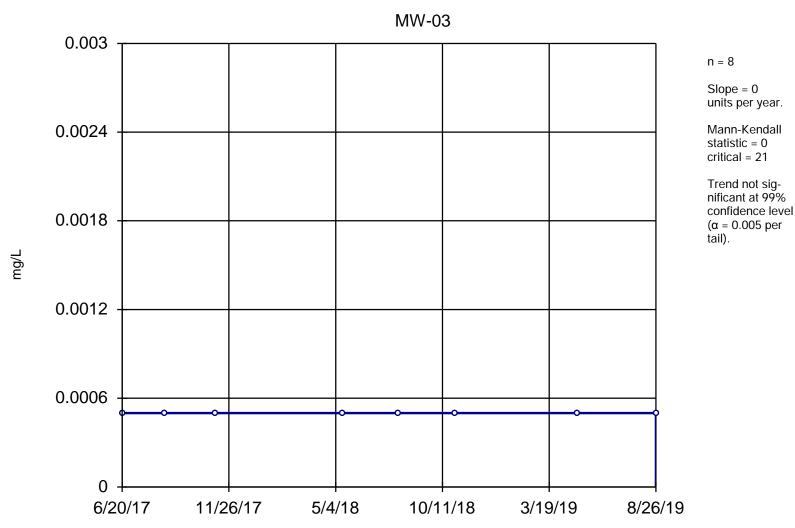
Constituent: Cadmium, Dissolved Analysis Run 4/2/2021 11:44 AM



Constituent: Cadmium, Dissolved Analysis Run 4/2/2021 11:44 AM
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

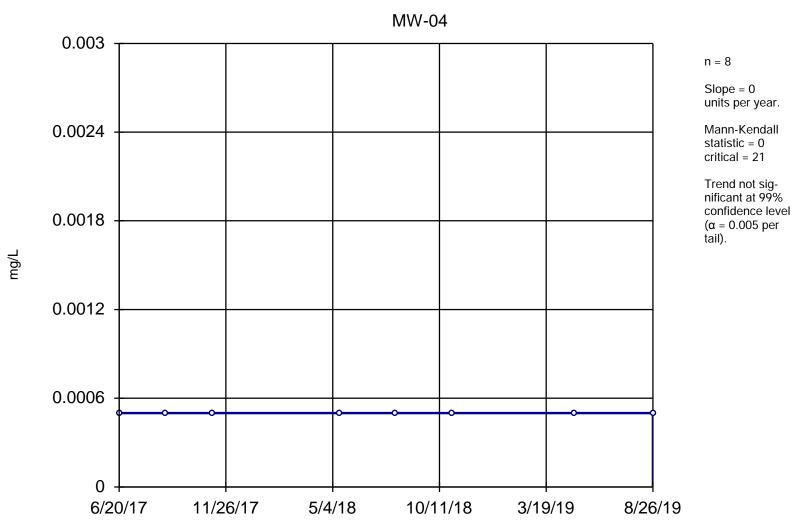


Constituent: Cadmium, Dissolved Analysis Run 4/2/2021 11:44 AM

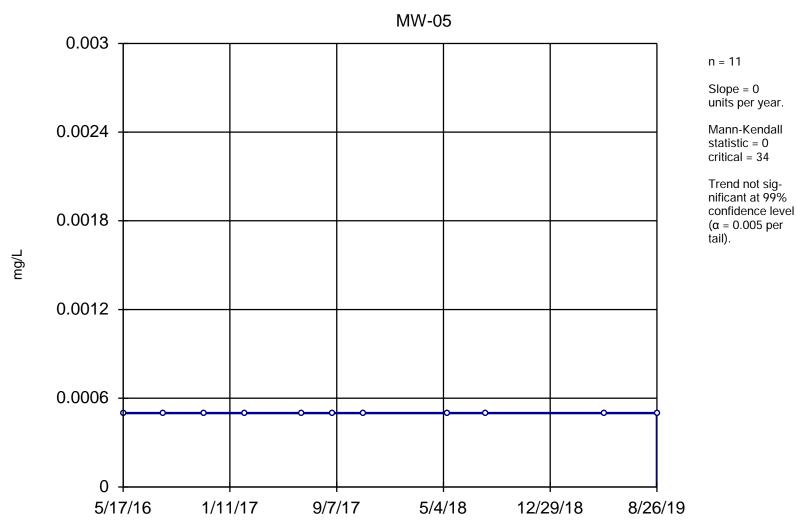


Constituent: Cadmium, Total Analysis Run 4/2/2021 11:44 AM

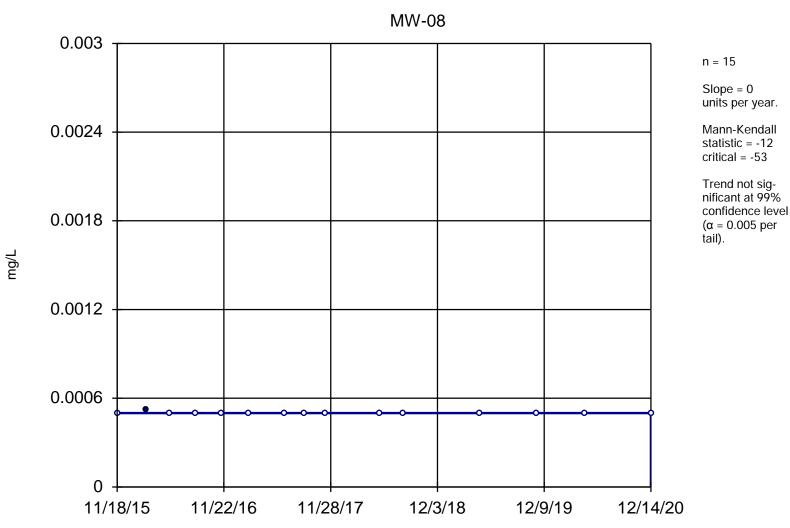
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



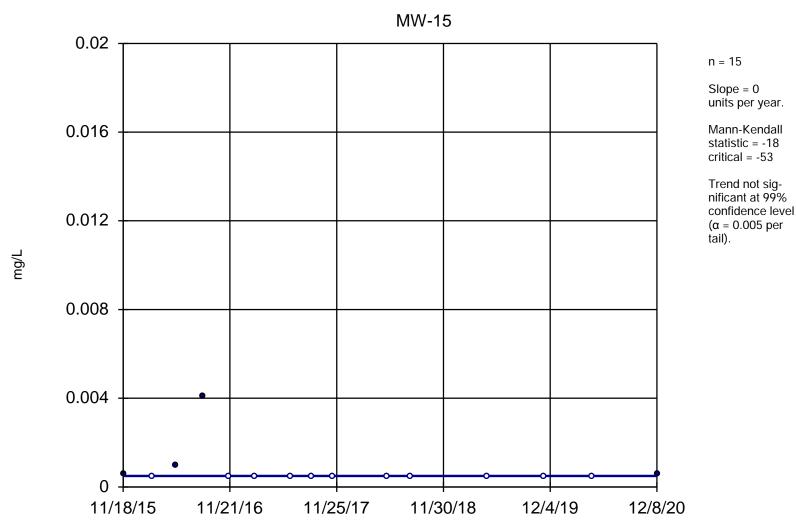
Constituent: Cadmium, Total Analysis Run 4/2/2021 11:45 AM



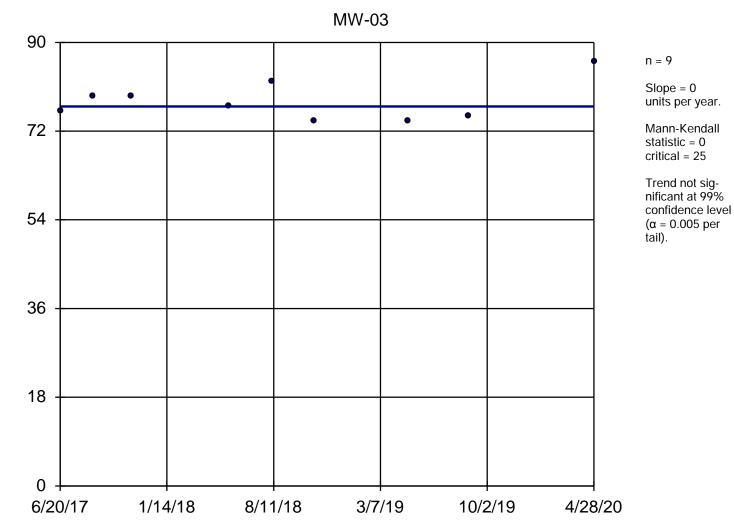
Constituent: Cadmium, Total Analysis Run 4/2/2021 11:45 AM



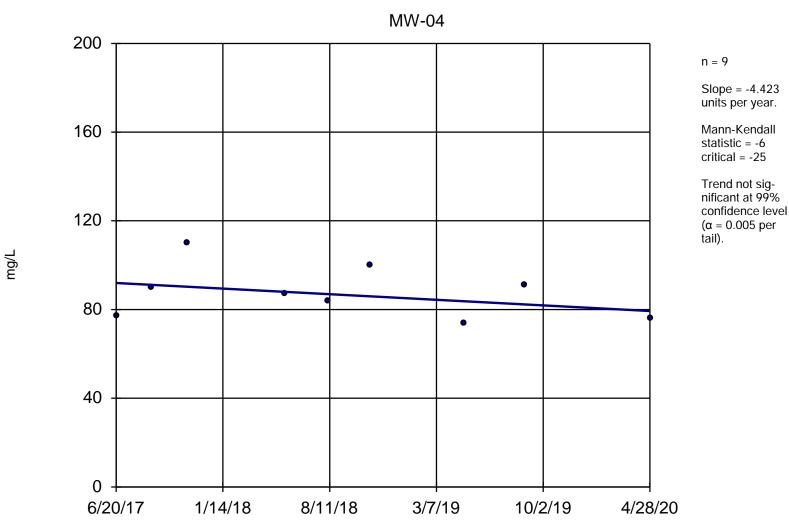
Constituent: Cadmium, Total Analysis Run 4/2/2021 11:45 AM



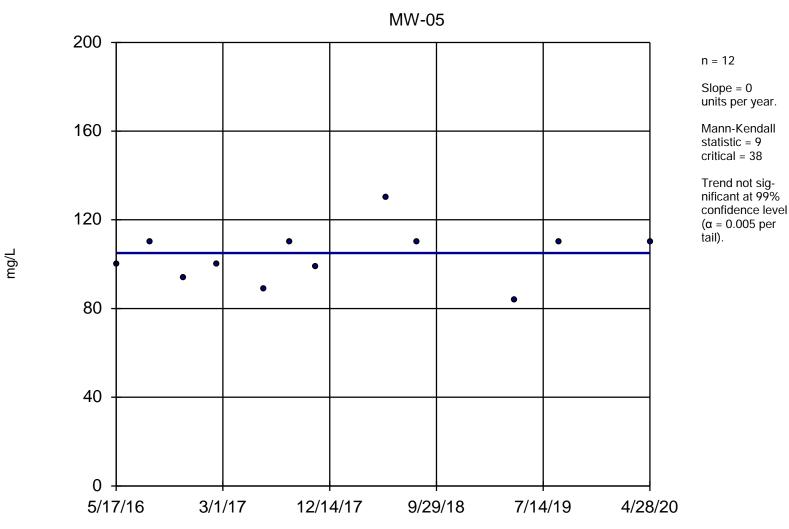
Constituent: Cadmium, Total Analysis Run 4/2/2021 11:45 AM



Constituent: Calcium, Total Analysis Run 4/2/2021 11:45 AM



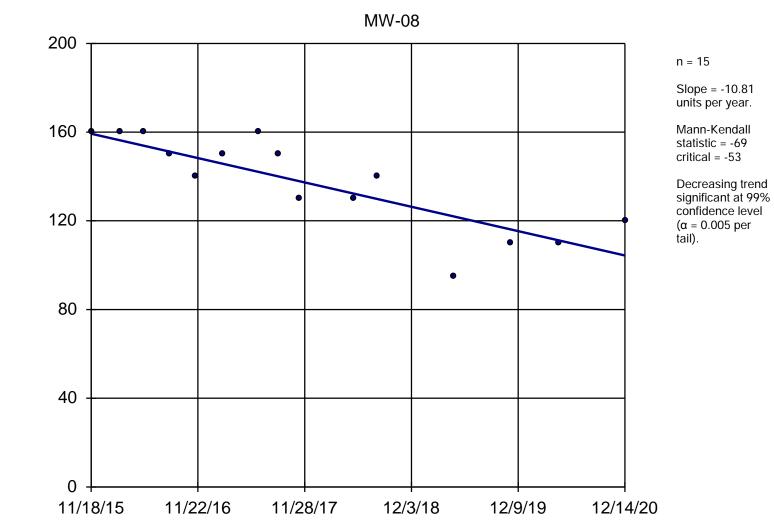
Constituent: Calcium, Total Analysis Run 4/2/2021 11:45 AM



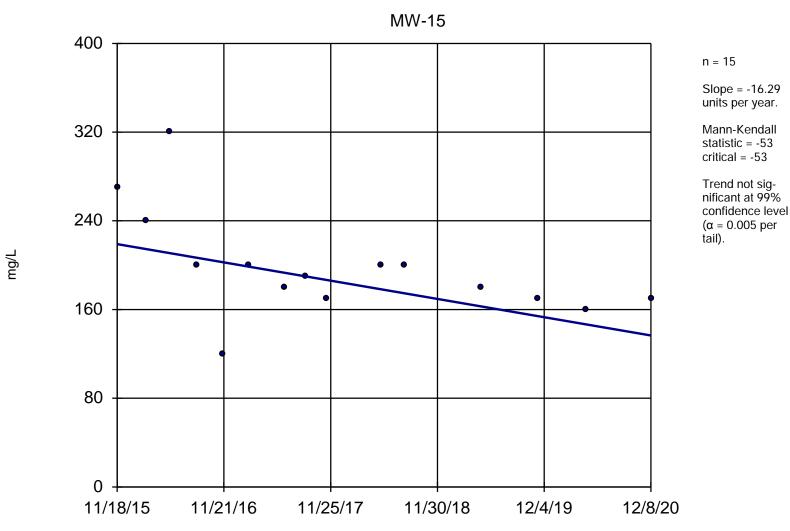
Constituent: Calcium, Total Analysis Run 4/2/2021 11:45 AM

mg/L

# Sen's Slope Estimator



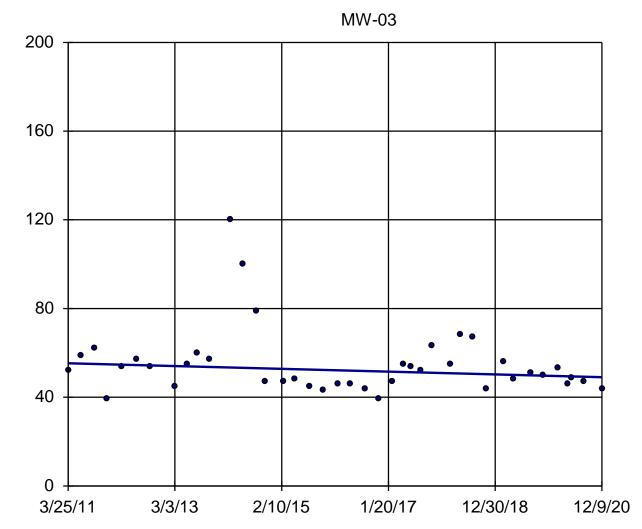
Constituent: Calcium, Total Analysis Run 4/2/2021 11:45 AM



Constituent: Calcium, Total Analysis Run 4/2/2021 11:45 AM

mg/L

# Sen's Slope Estimator



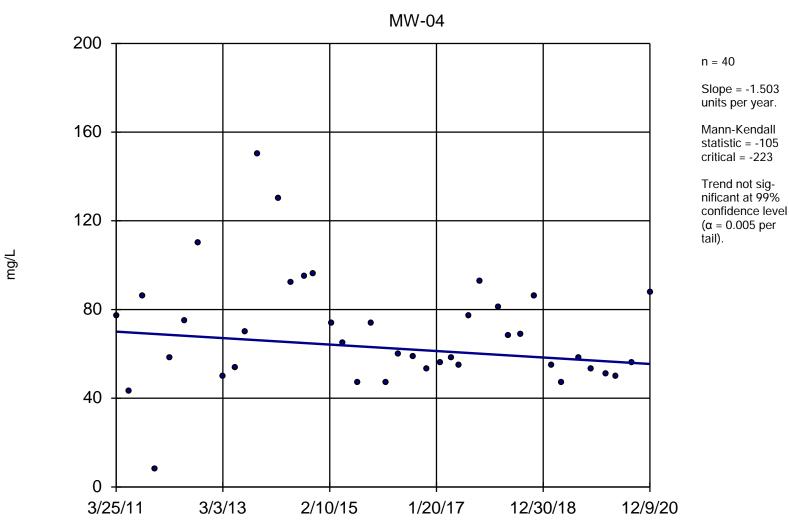
n = 41

Slope = -0.6472 units per year.

Mann-Kendall normal approx. = -1.283 critical = -2.58

Trend not significant at 99% confidence level ( $\alpha = 0.005$  per tail).

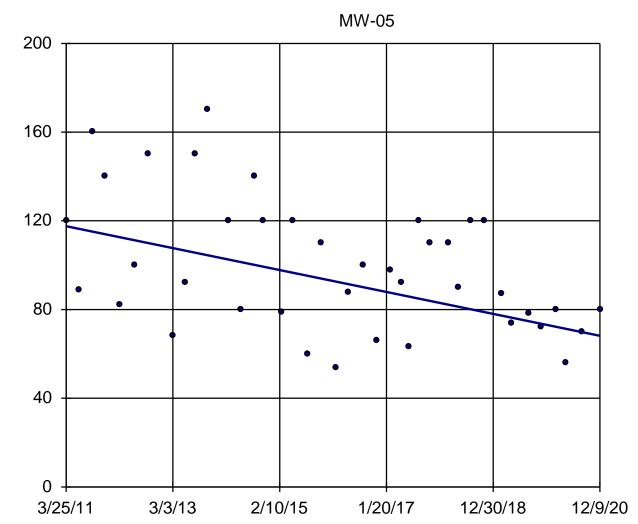
Constituent: Chloride Analysis Run 4/2/2021 11:45 AM



Constituent: Chloride Analysis Run 4/2/2021 11:45 AM

mg/L

# Sen's Slope Estimator



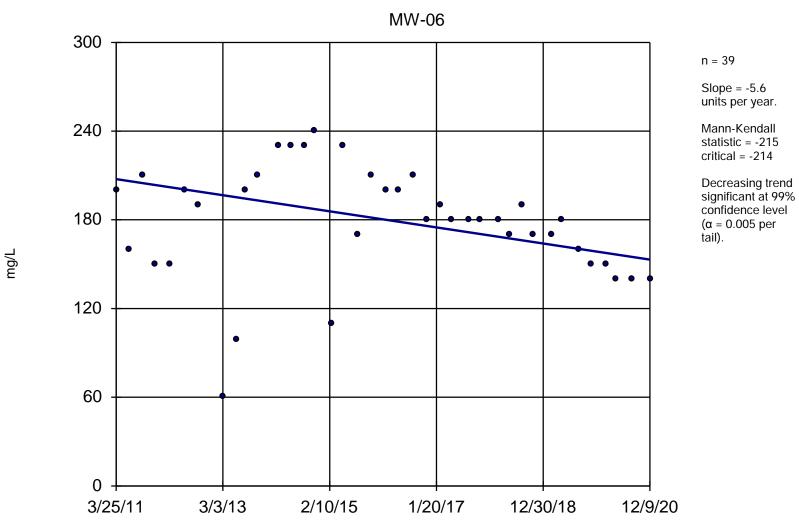
n = 40

Slope = -5.086 units per year.

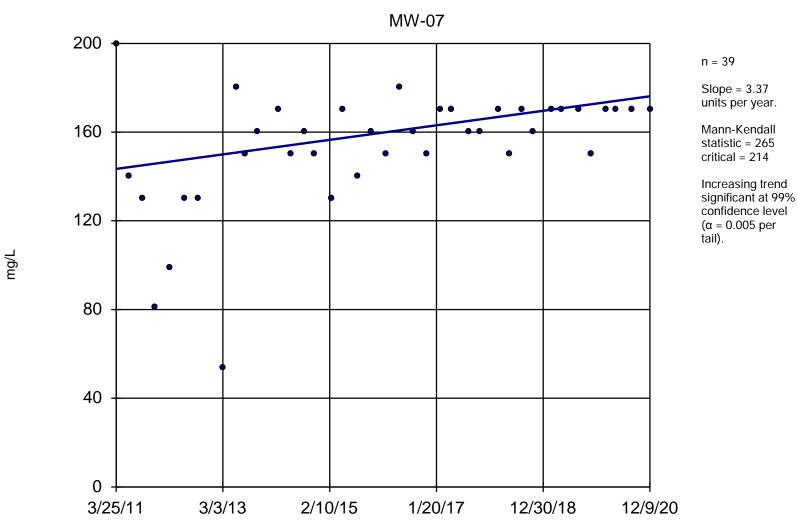
Mann-Kendall statistic = -249 critical = -223

Decreasing trend significant at 99% confidence level ( $\alpha = 0.005$  per tail).

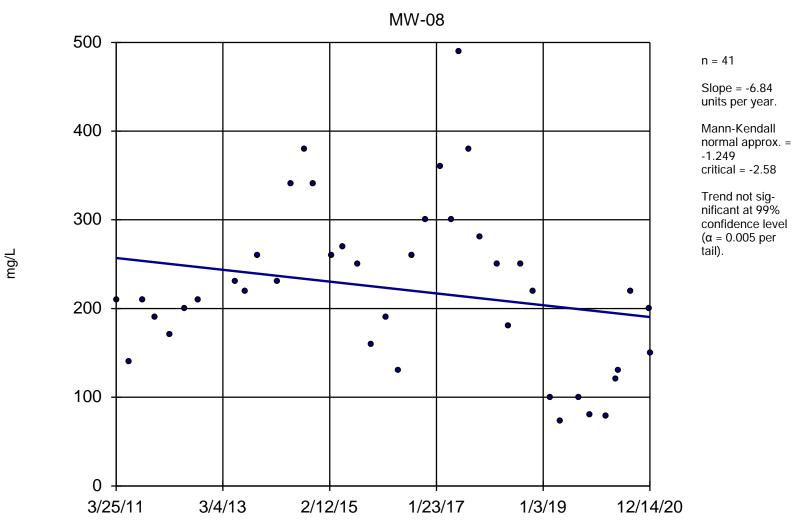
Constituent: Chloride Analysis Run 4/2/2021 11:45 AM



Constituent: Chloride Analysis Run 4/2/2021 11:45 AM



Constituent: Chloride Analysis Run 4/2/2021 11:45 AM

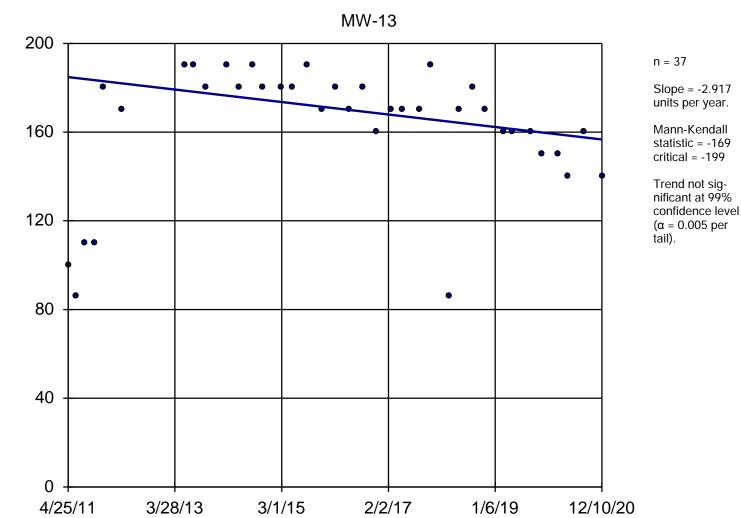


Constituent: Chloride Analysis Run 4/2/2021 11:45 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

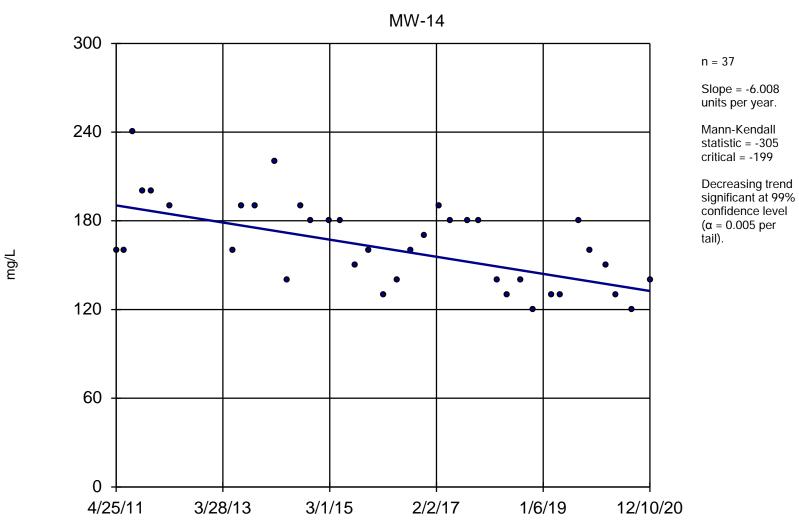
mg/L

# Sen's Slope Estimator



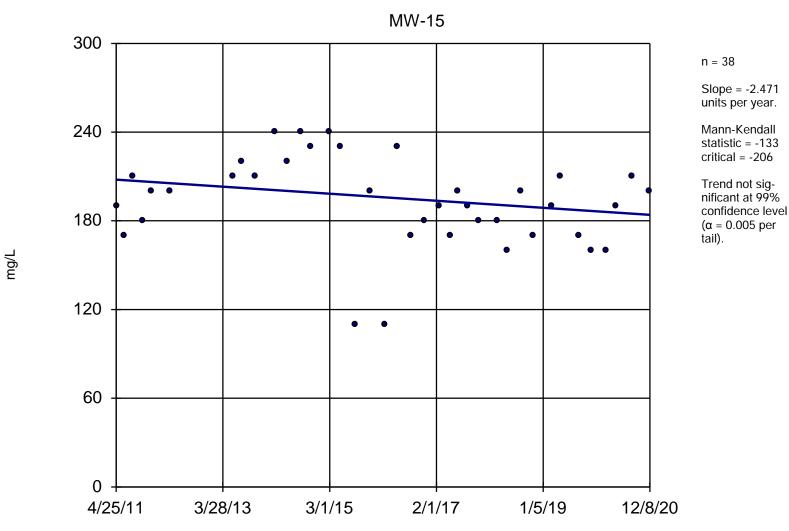
Constituent: Chloride Analysis Run 4/2/2021 11:45 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



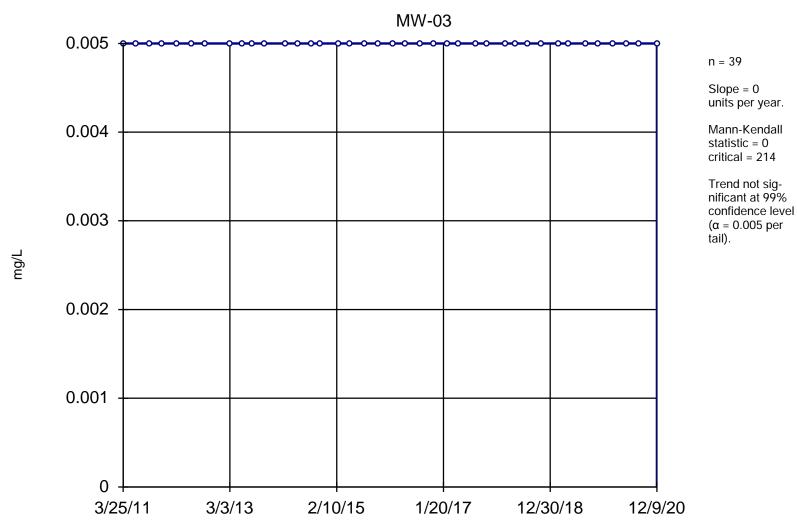
Constituent: Chloride Analysis Run 4/2/2021 11:45 AM

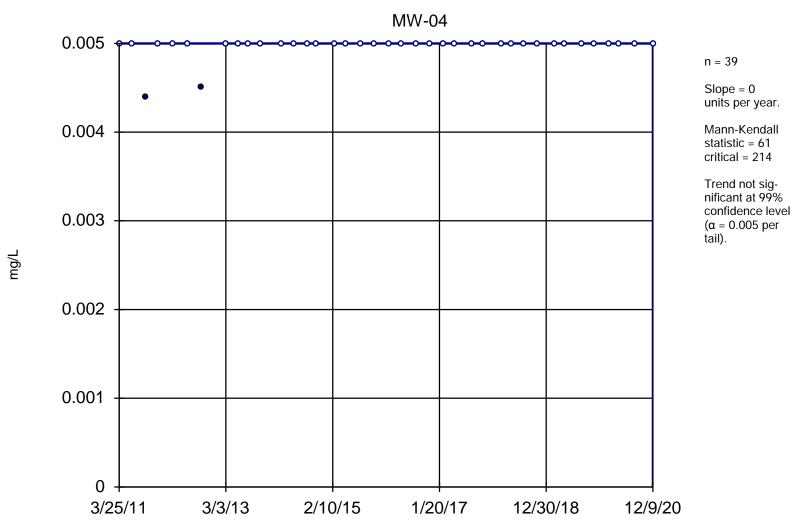
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

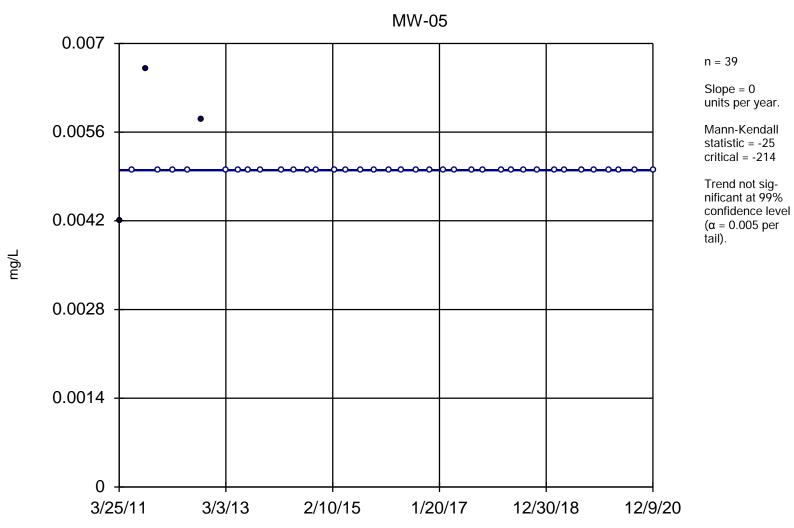


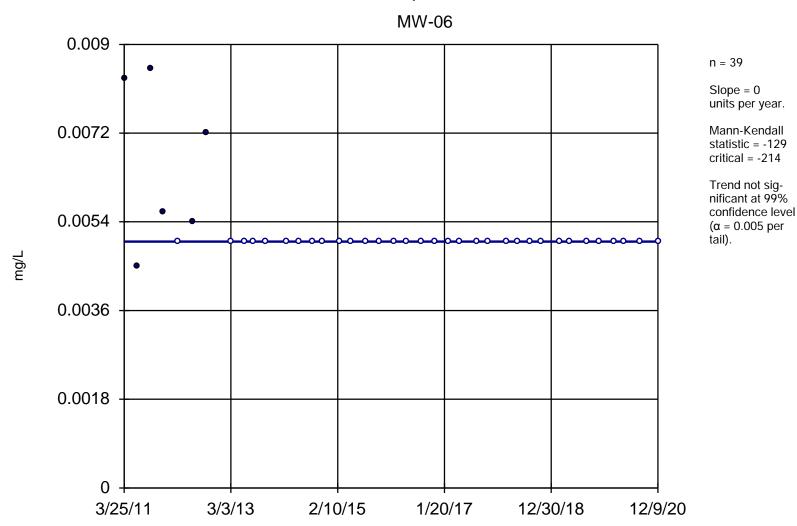
Constituent: Chloride Analysis Run 4/2/2021 11:45 AM

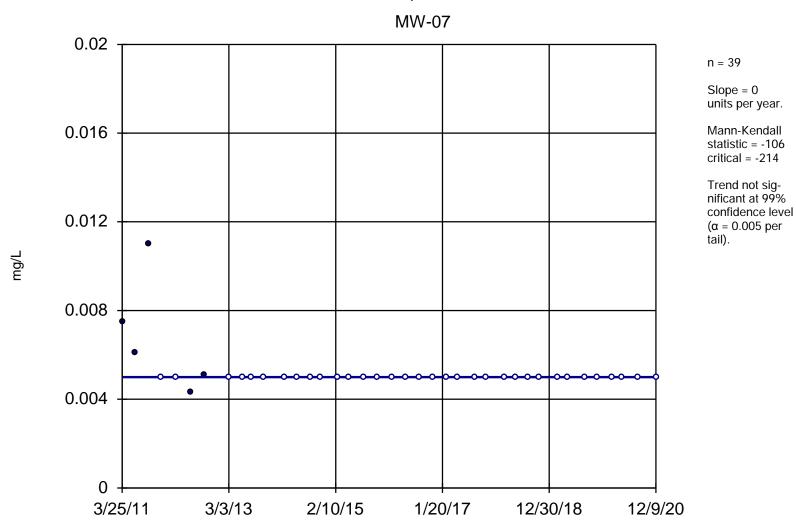
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

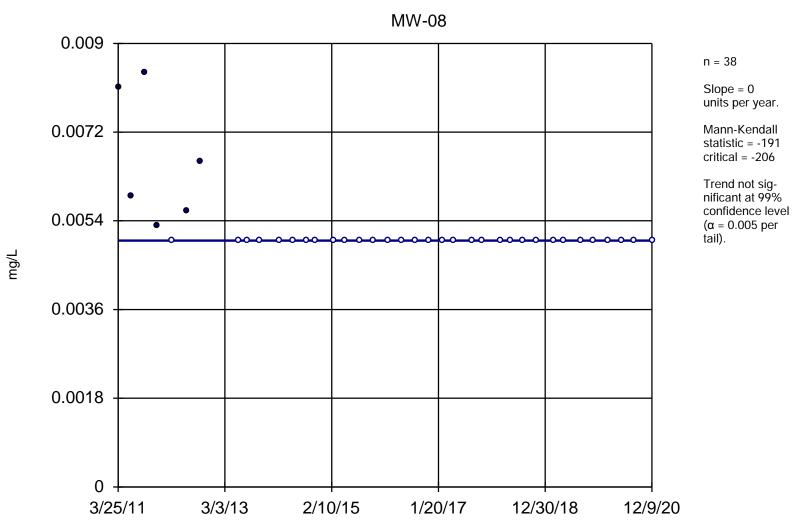


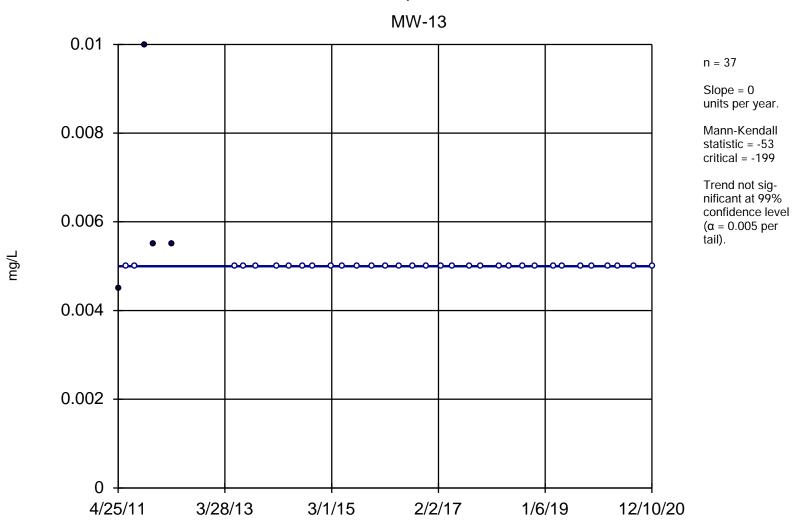




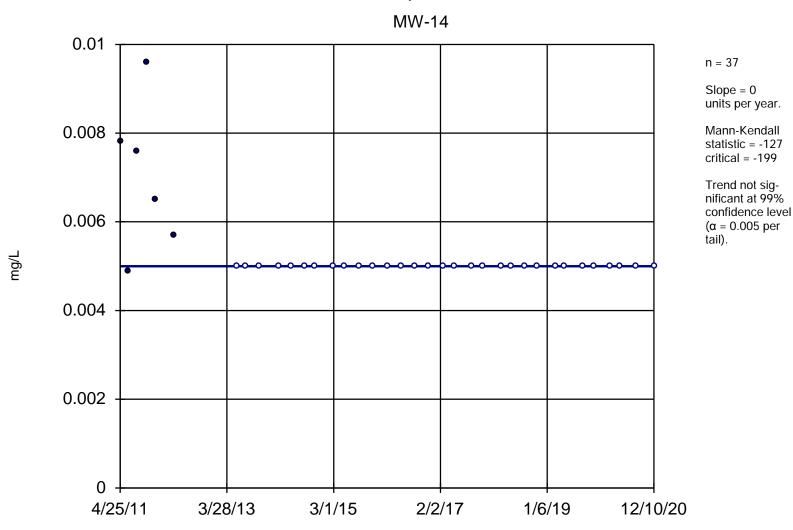


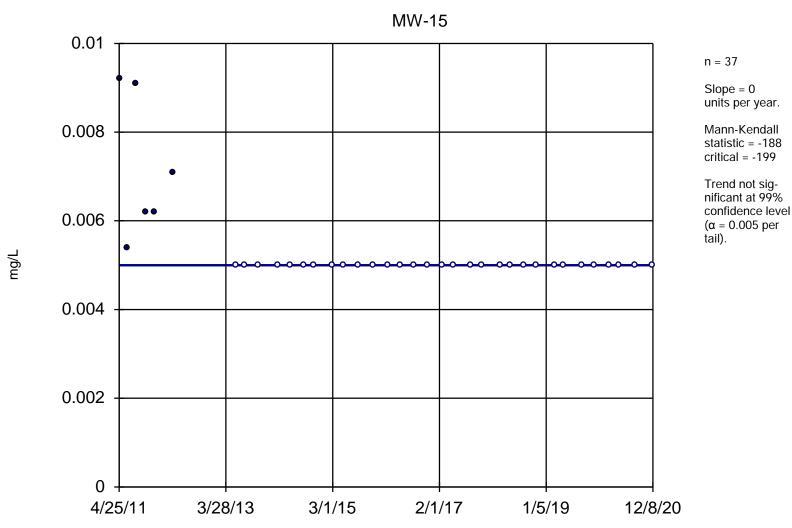


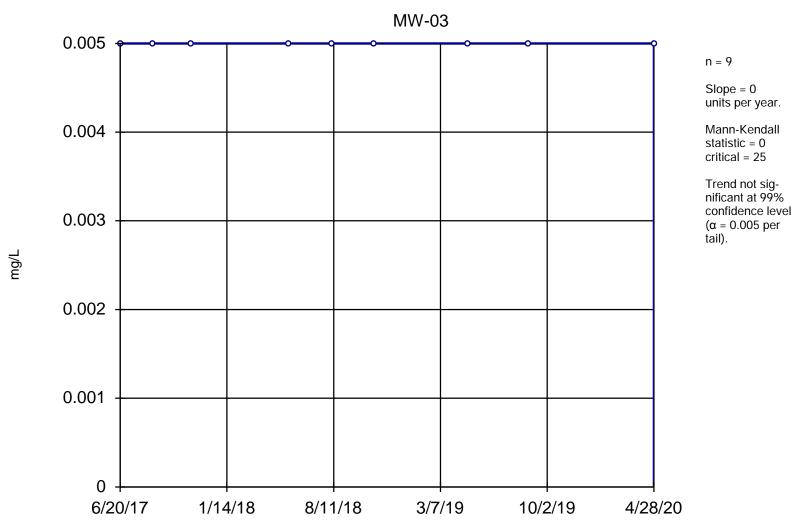




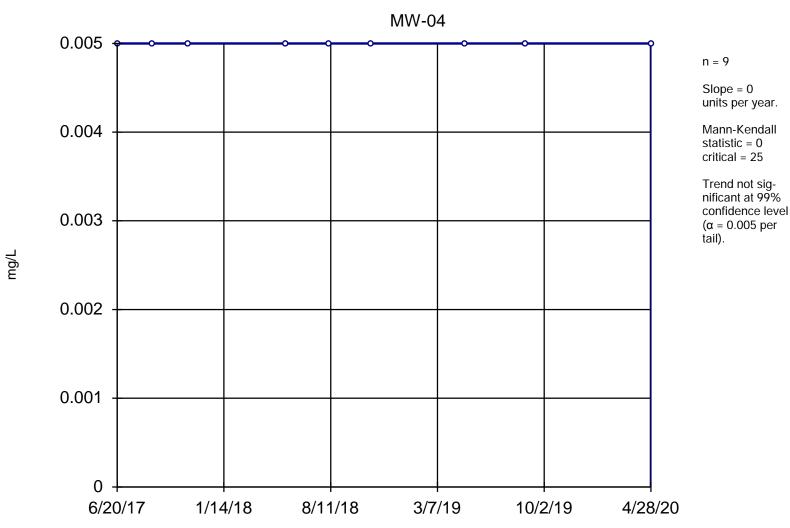
Constituent: Chromium, Dissolved Analysis Run 4/2/2021 11:45 AM
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



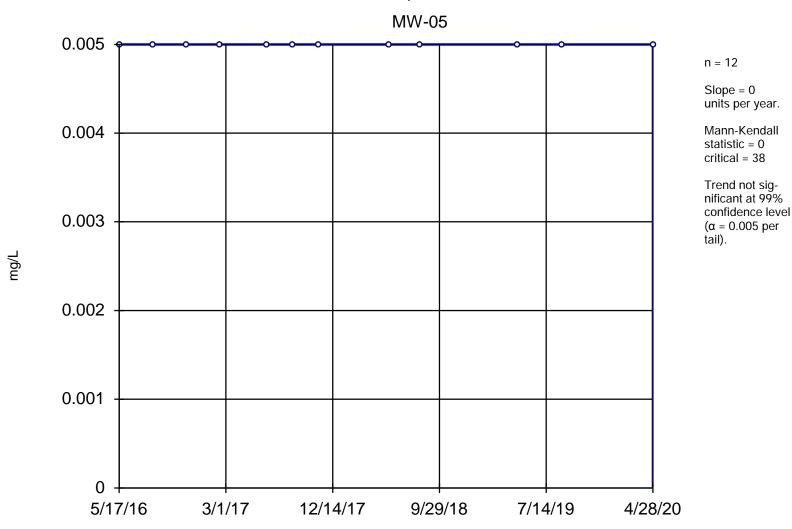




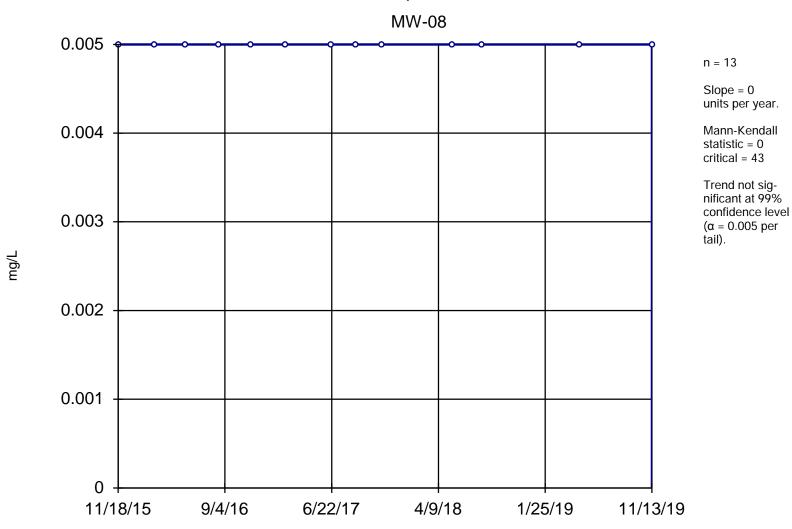
Constituent: Chromium, Total Analysis Run 4/2/2021 11:45 AM



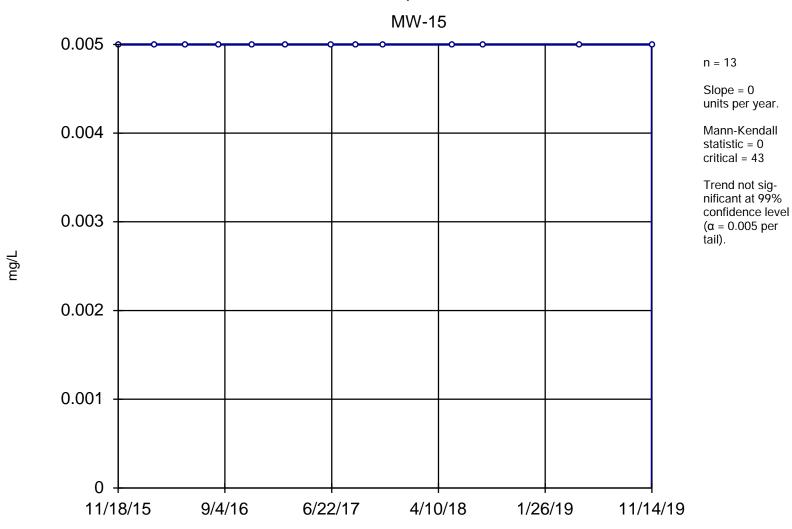
Constituent: Chromium, Total Analysis Run 4/2/2021 11:45 AM



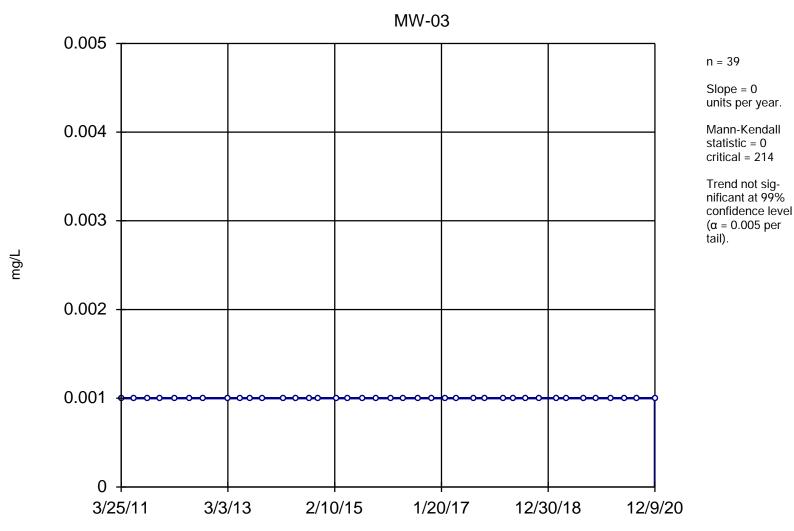
Constituent: Chromium, Total Analysis Run 4/2/2021 11:45 AM



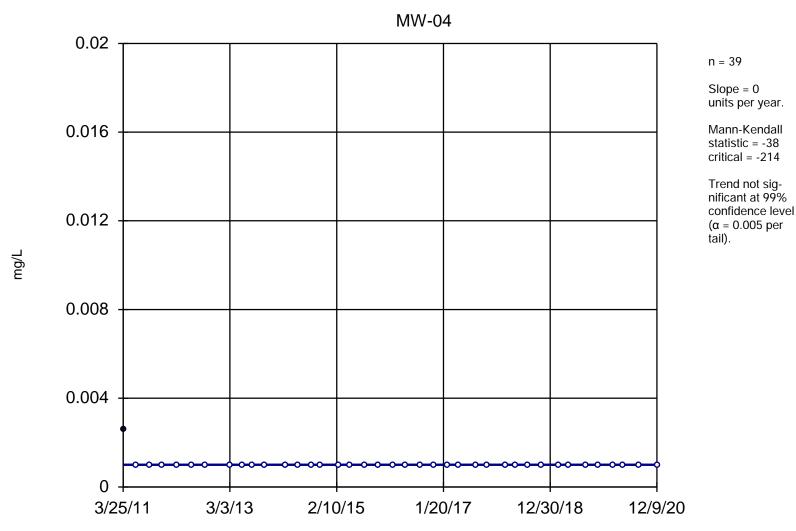
Constituent: Chromium, Total Analysis Run 4/2/2021 11:45 AM



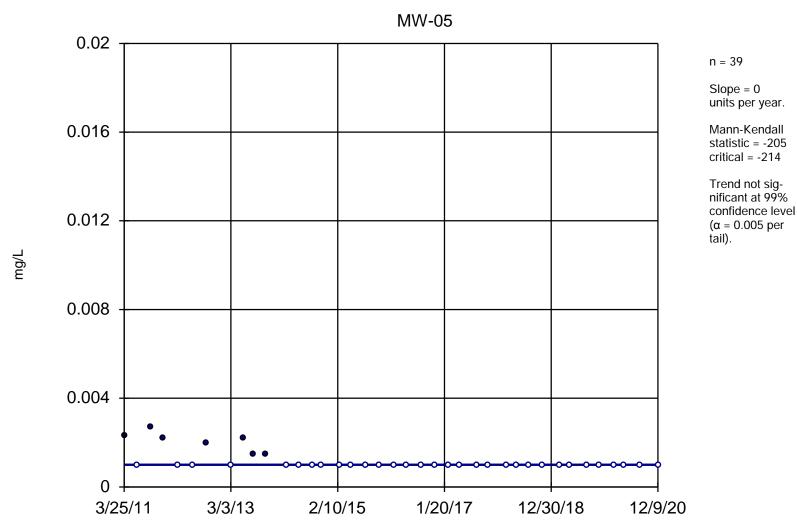
Constituent: Chromium, Total Analysis Run 4/2/2021 11:45 AM



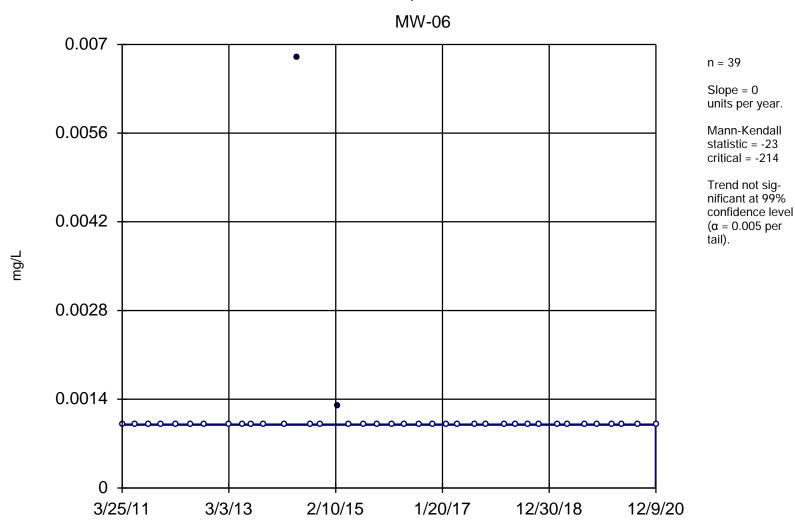
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:45 AM



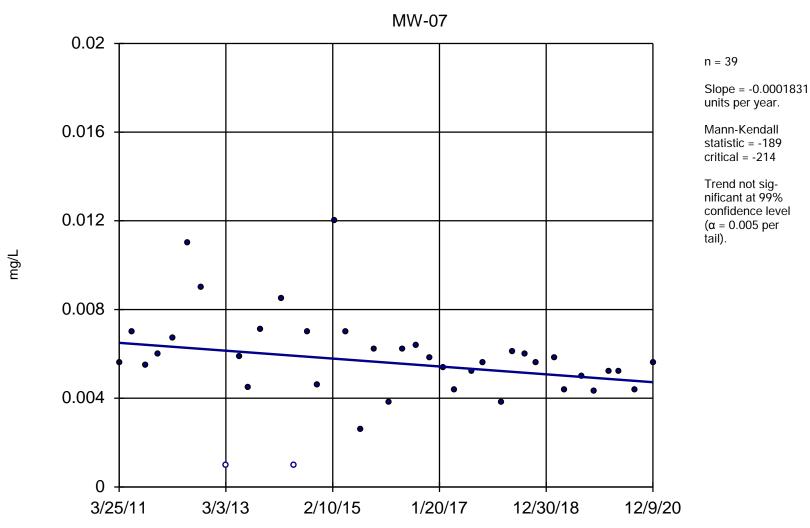
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:45 AM



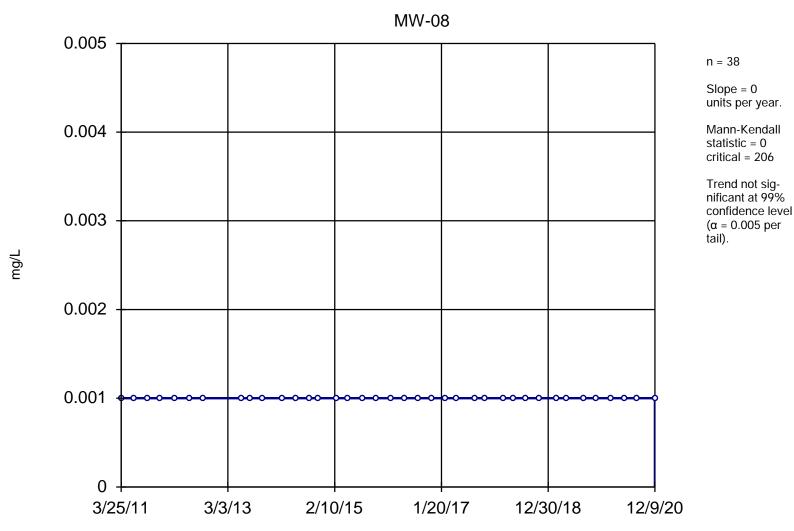
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:45 AM



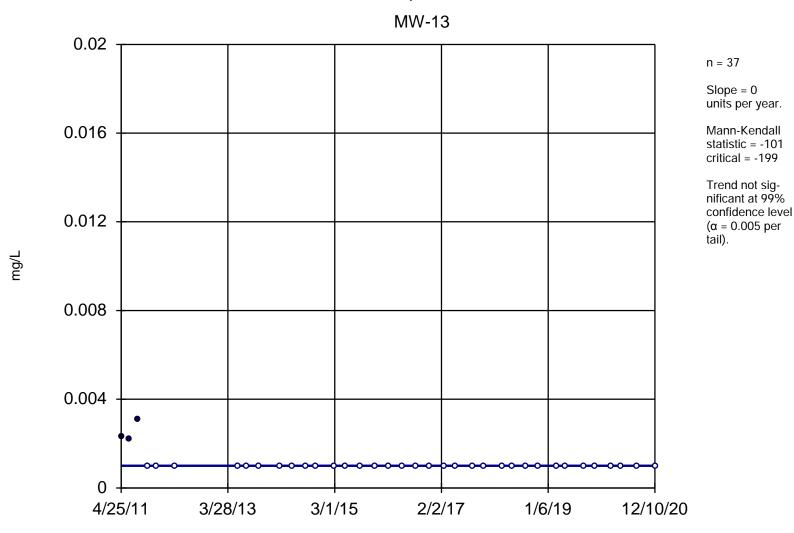
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:45 AM



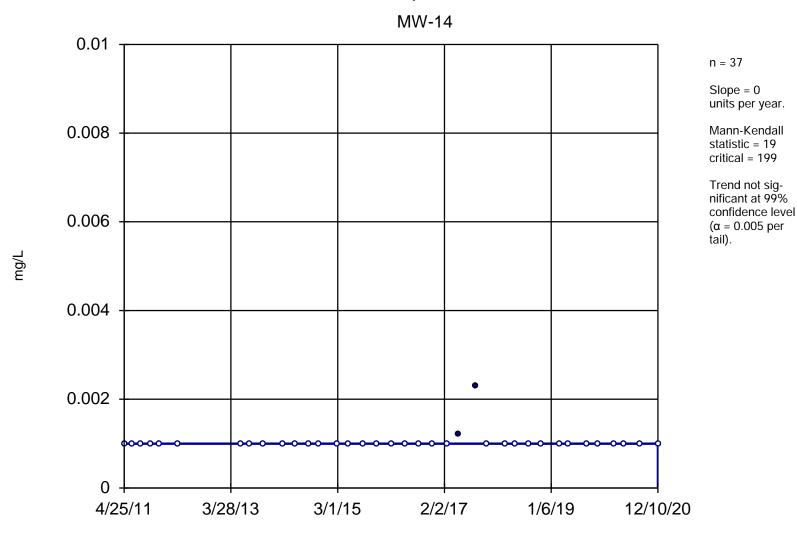
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:45 AM



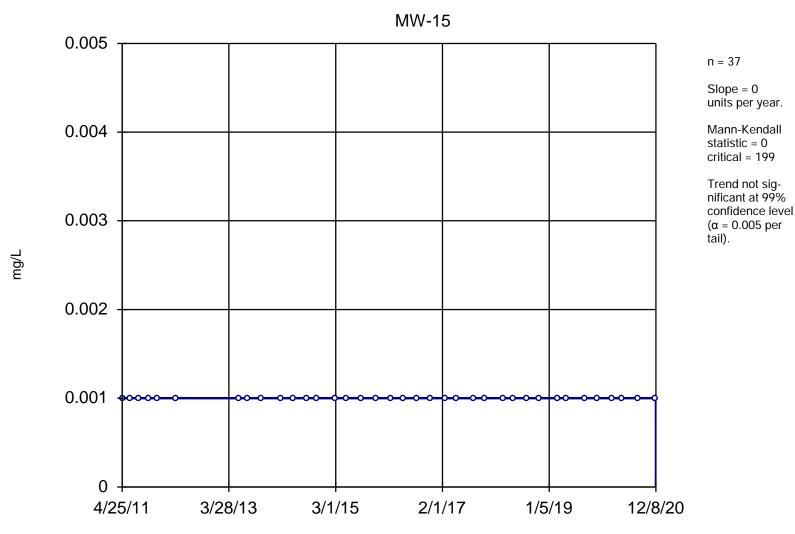
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:45 AM



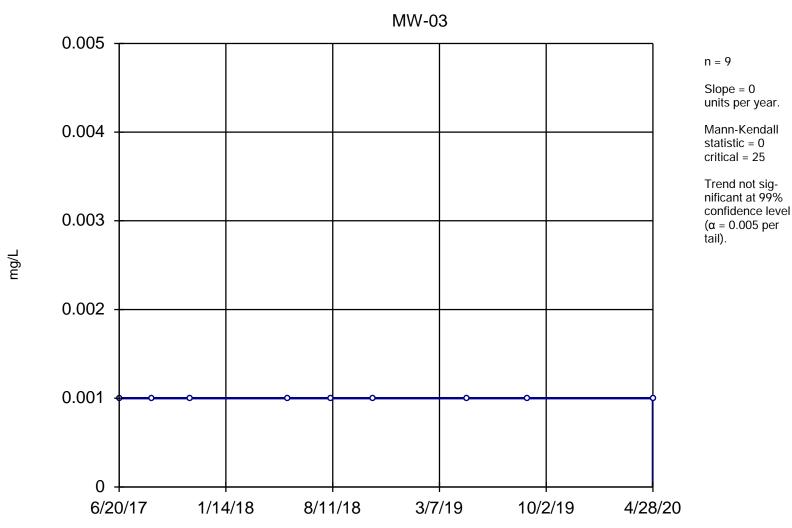
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:45 AM



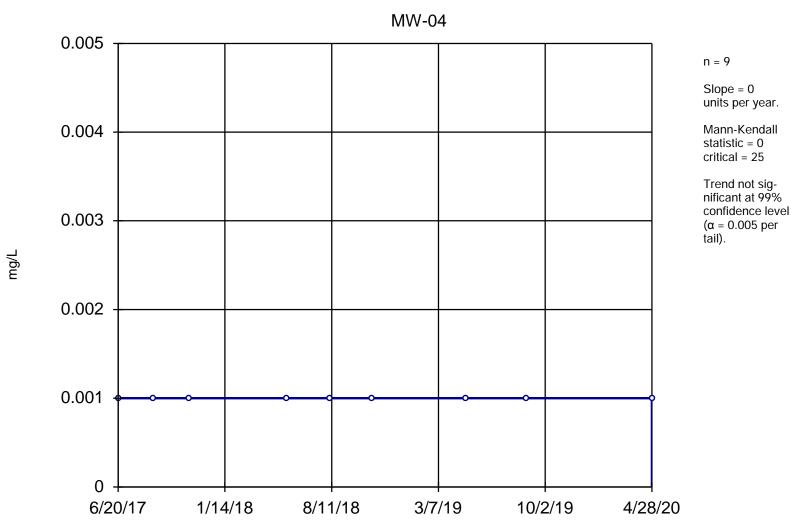
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:45 AM



Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 11:45 AM

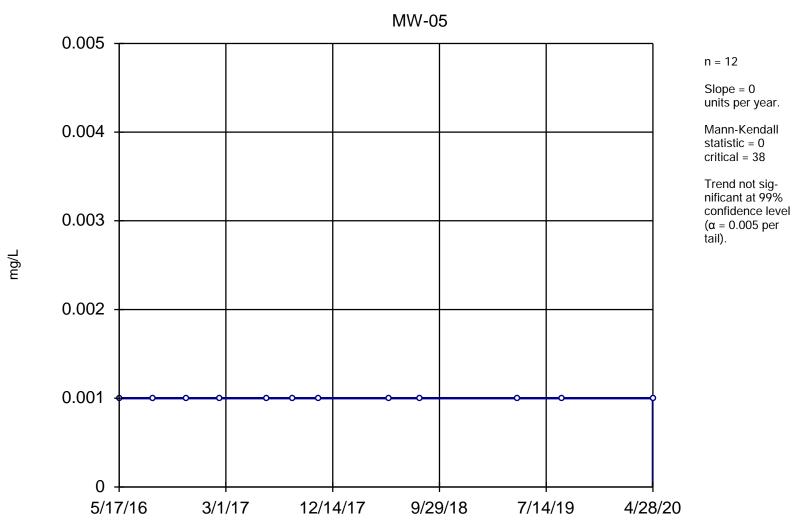


Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

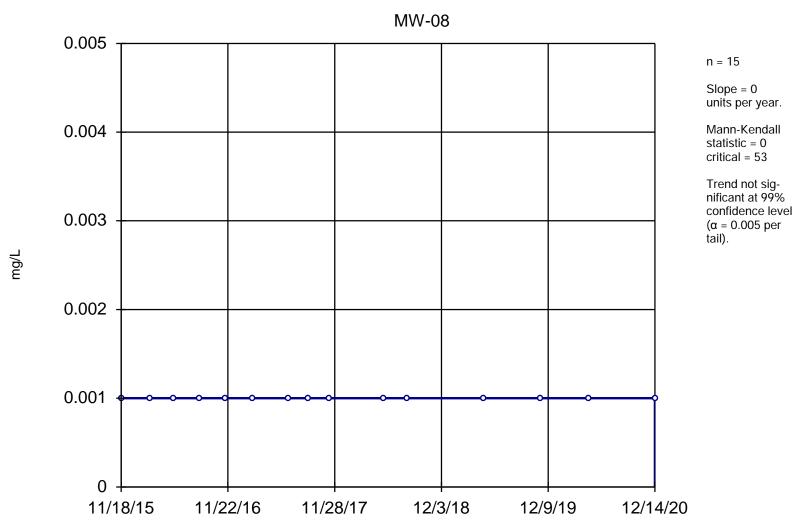


Constituent: Cobalt, Total Analysis Run 4/2/2021 11:45 AM

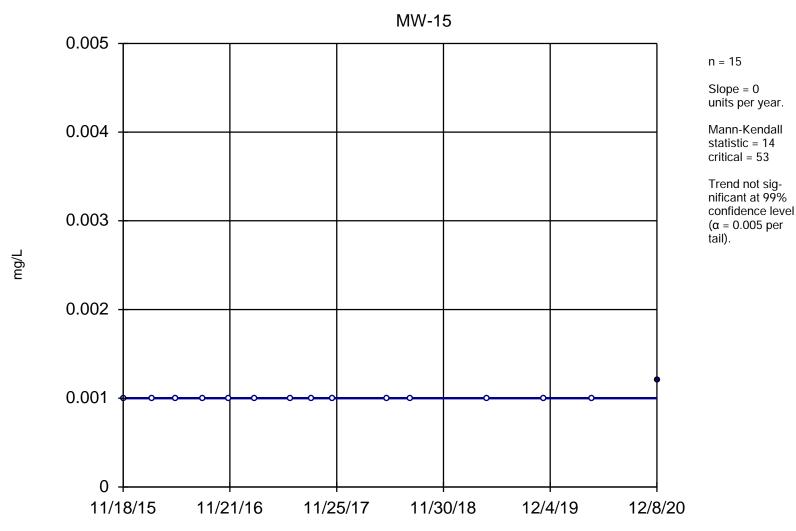
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



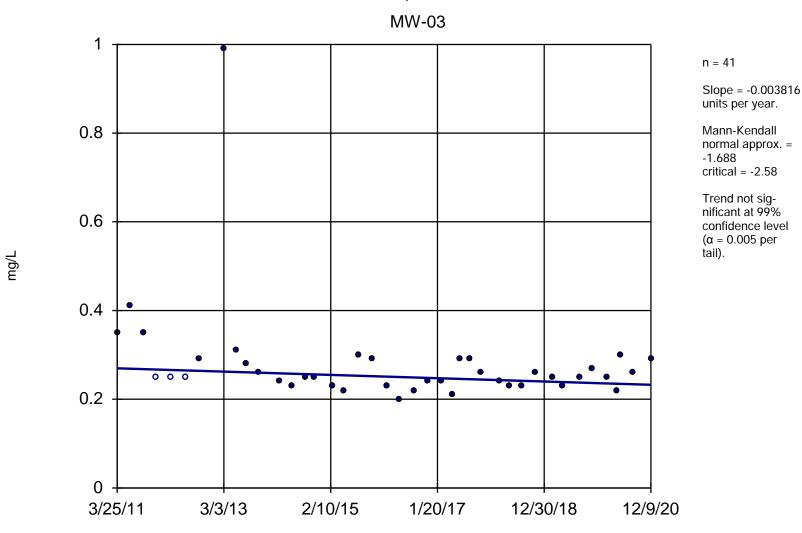
Constituent: Cobalt, Total Analysis Run 4/2/2021 11:45 AM



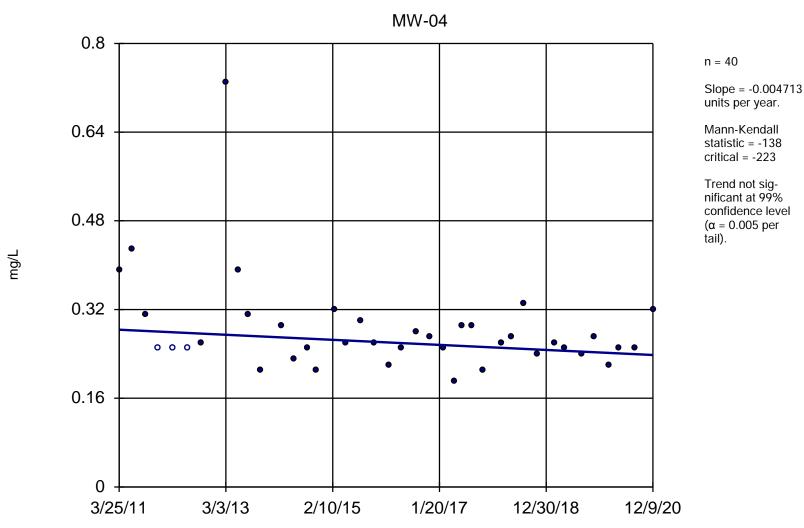
Constituent: Cobalt, Total Analysis Run 4/2/2021 11:45 AM



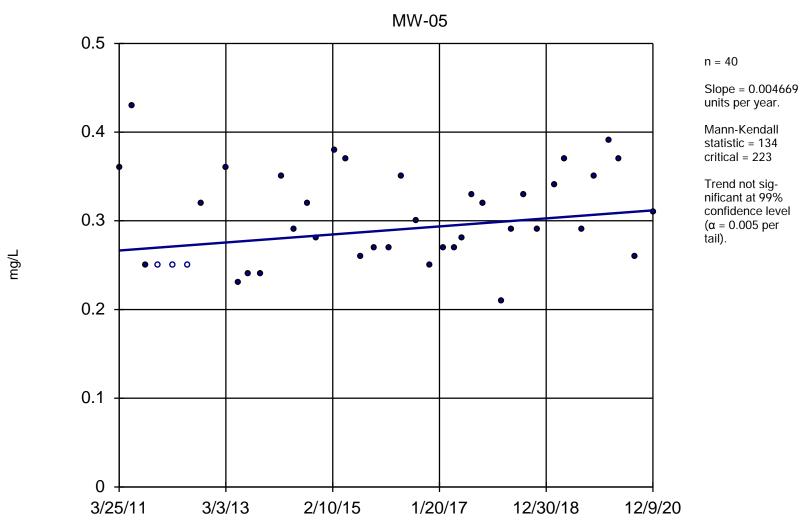
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



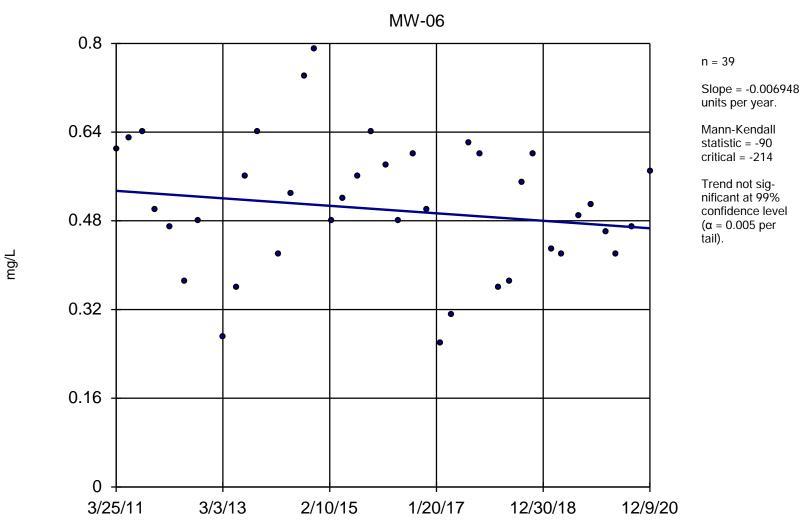
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



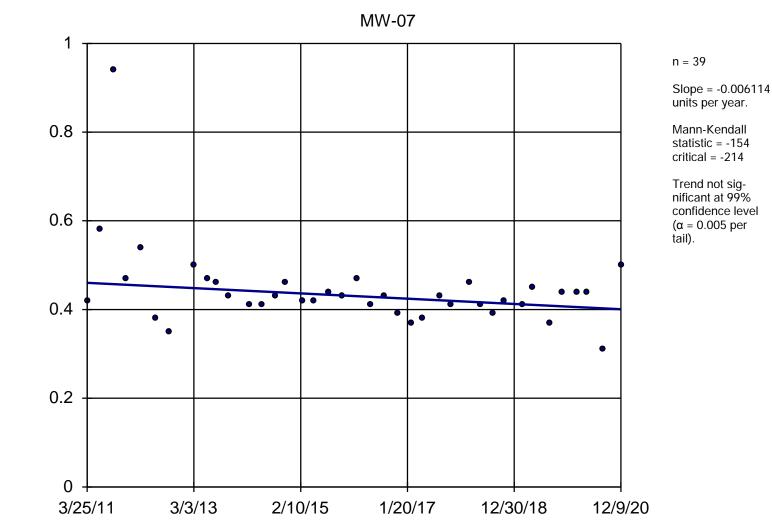
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

mg/L

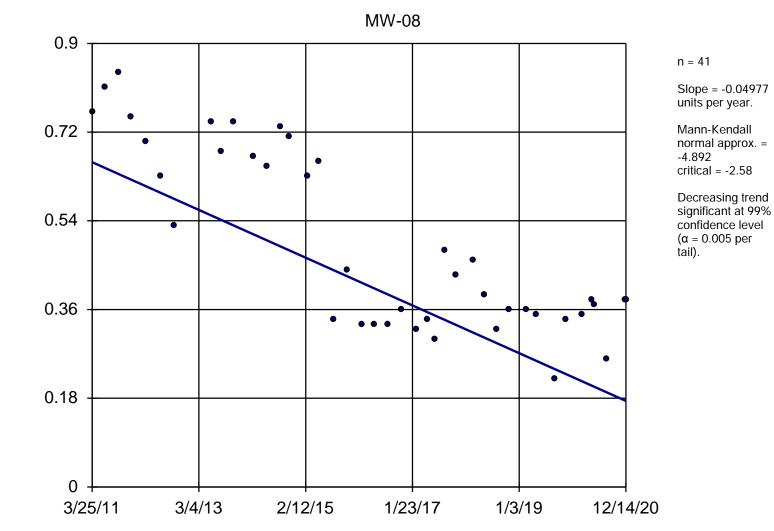
# Sen's Slope Estimator



Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

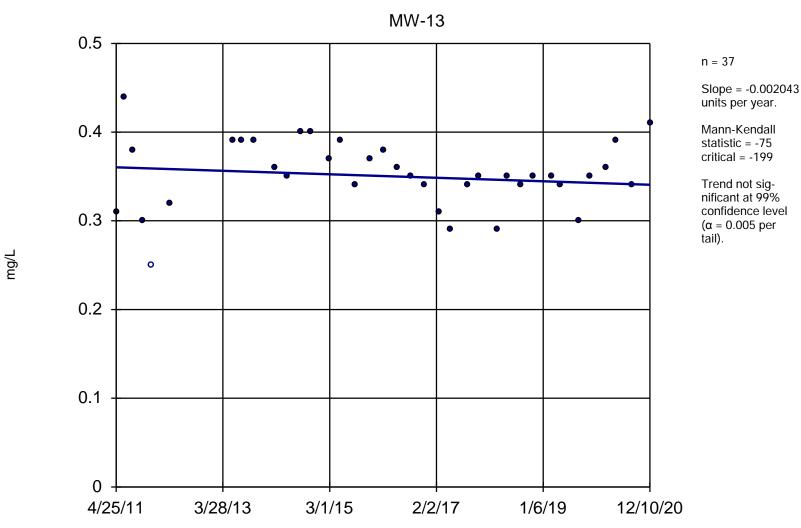
mg/L

# Sen's Slope Estimator



Constituent: Fluoride Analysis Run 4/2/2021 11:45 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



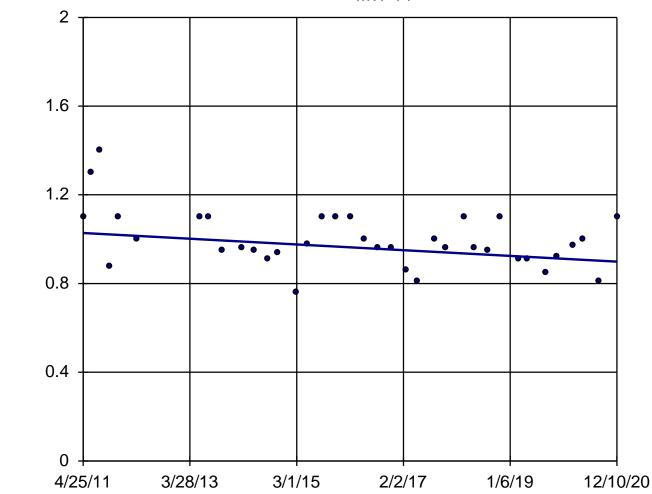
Constituent: Fluoride Analysis Run 4/2/2021 11:45 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

mg/L

# Sen's Slope Estimator





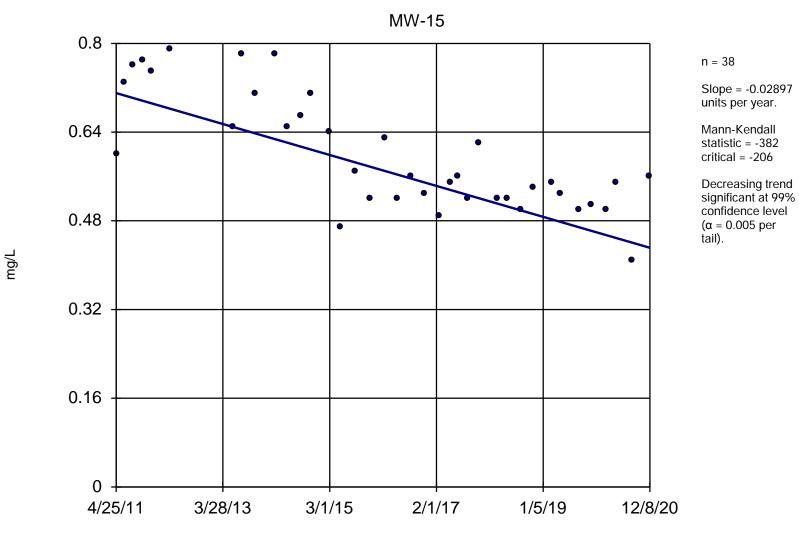
n = 37

Slope = -0.01334 units per year.

Mann-Kendall statistic = -154 critical = -199

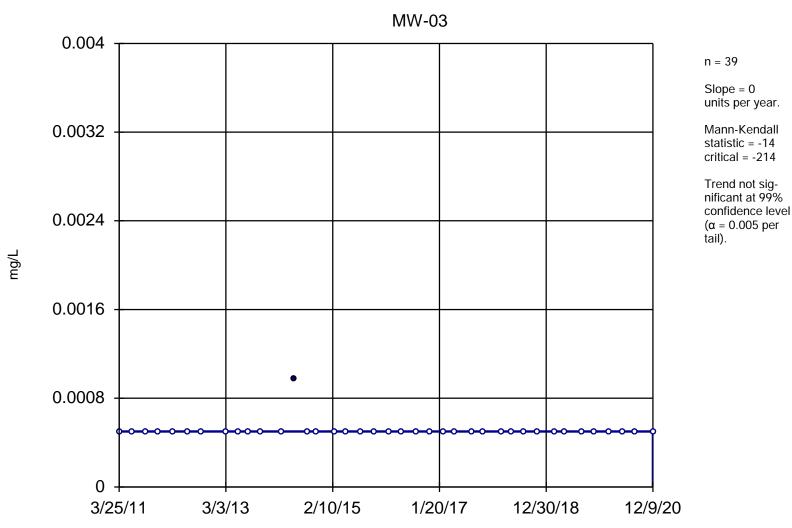
Trend not significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

Constituent: Fluoride Analysis Run 4/2/2021 11:45 AM

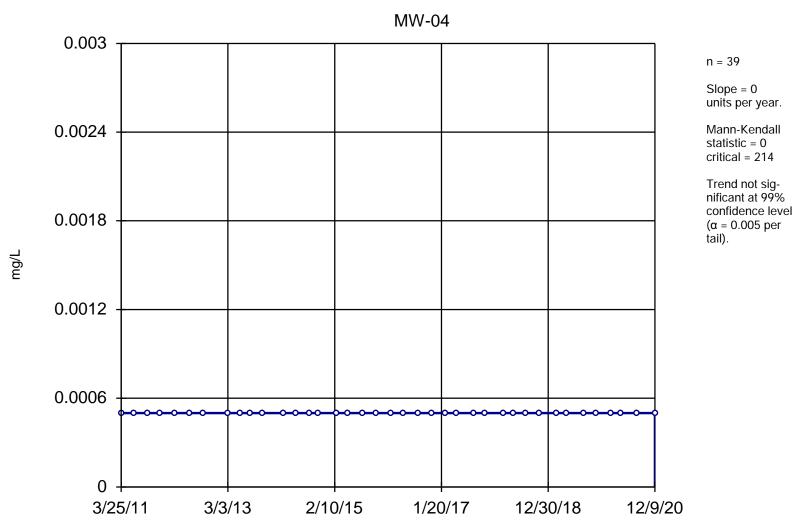


Constituent: Fluoride Analysis Run 4/2/2021 11:45 AM

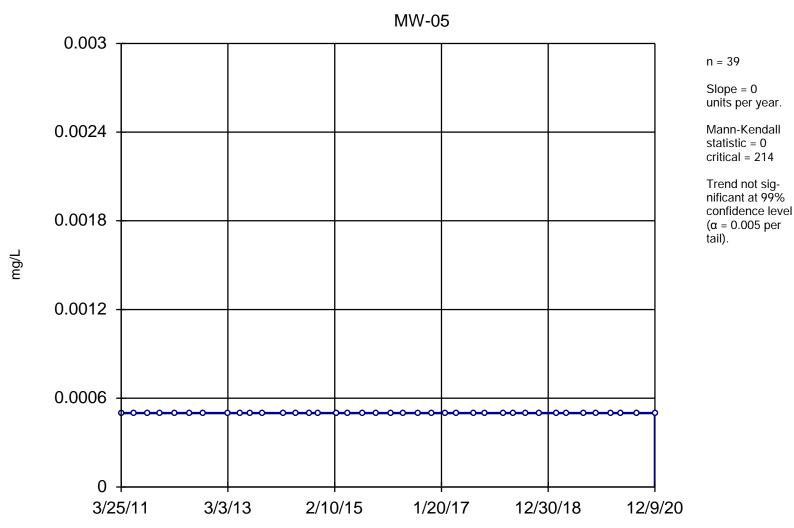
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



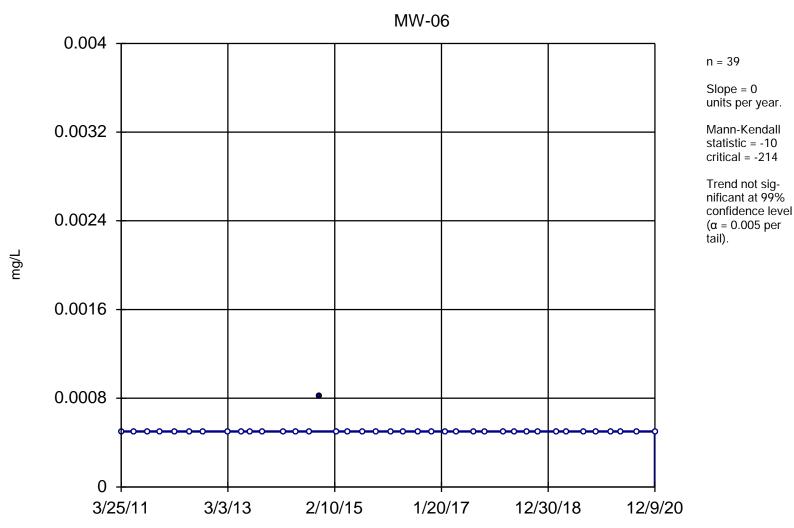
Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:45 AM



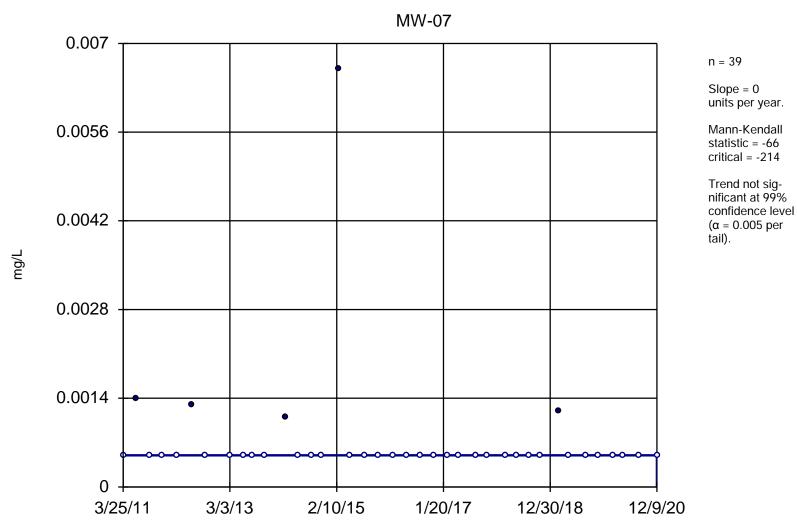
Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:45 AM



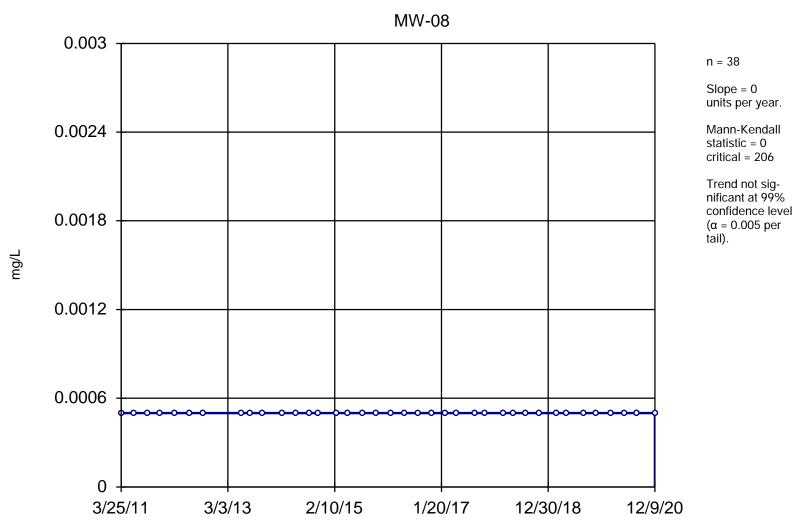
Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:45 AM



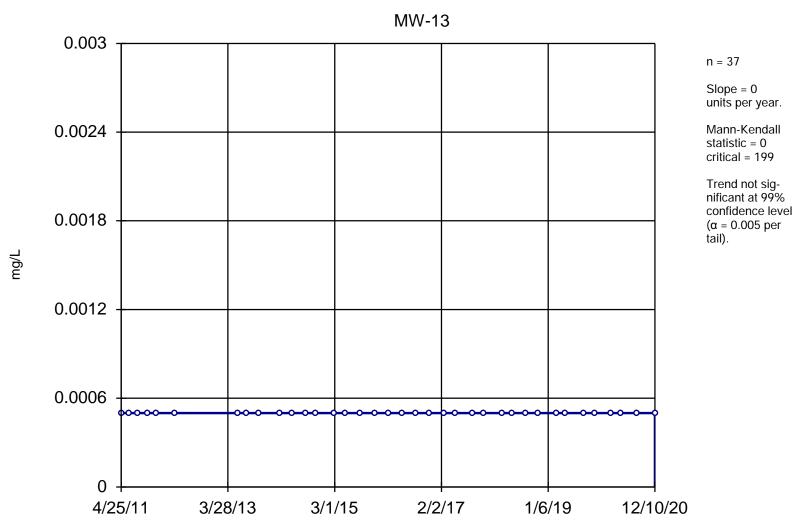
Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:45 AM



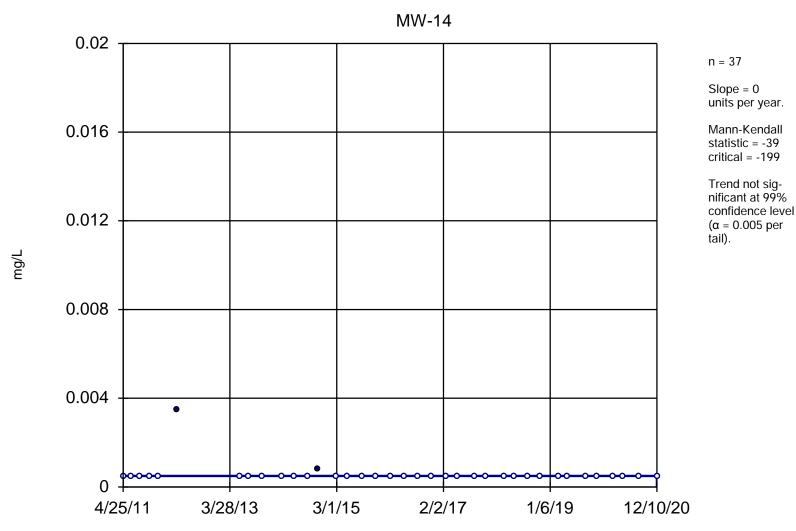
Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:46 AM



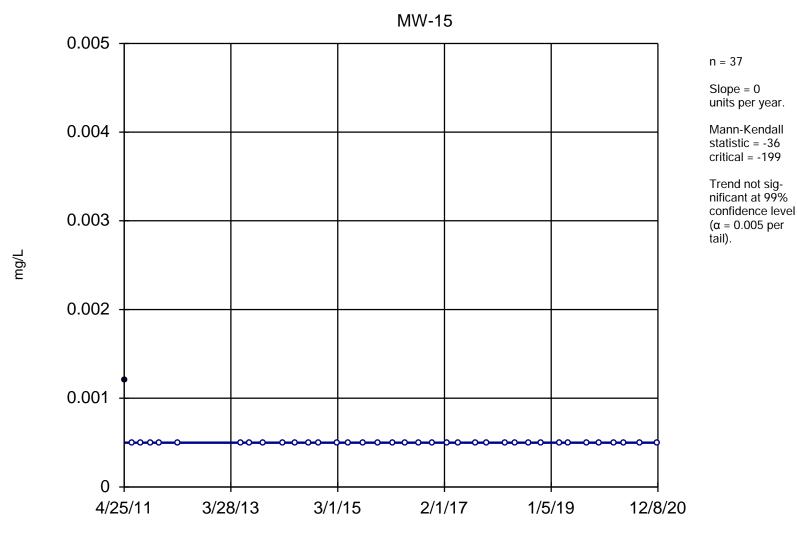
Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:46 AM



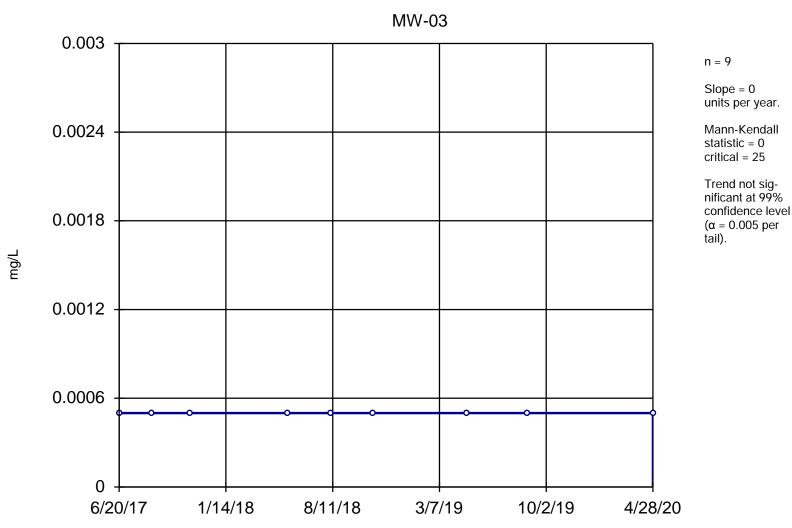
Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:46 AM



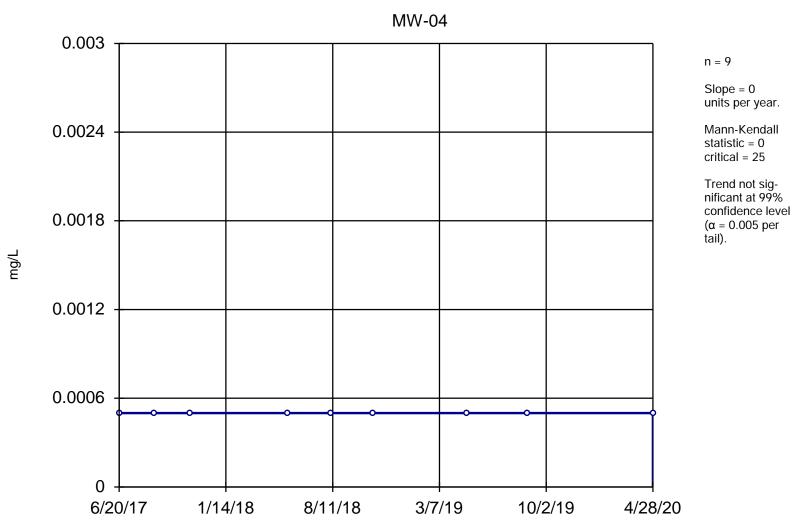
Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:46 AM



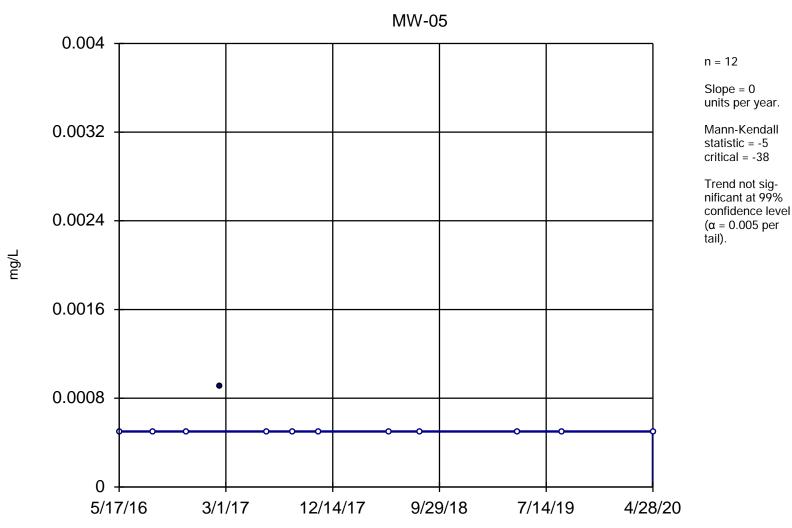
Constituent: Lead, Dissolved Analysis Run 4/2/2021 11:46 AM



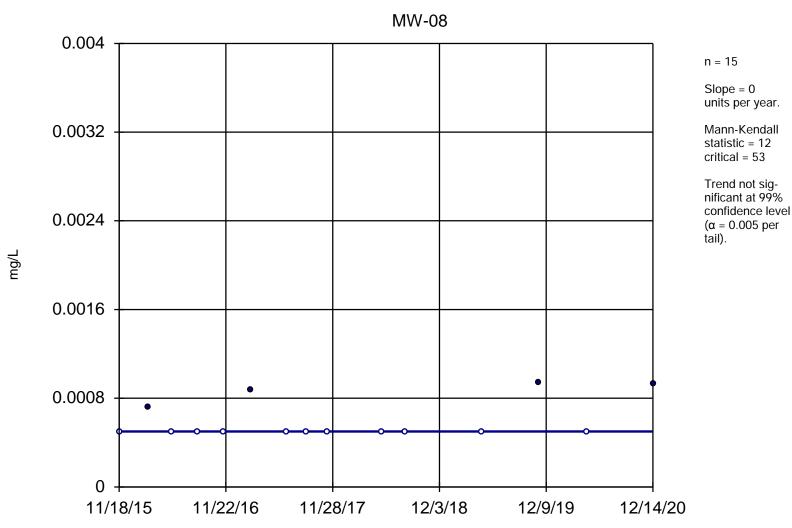
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



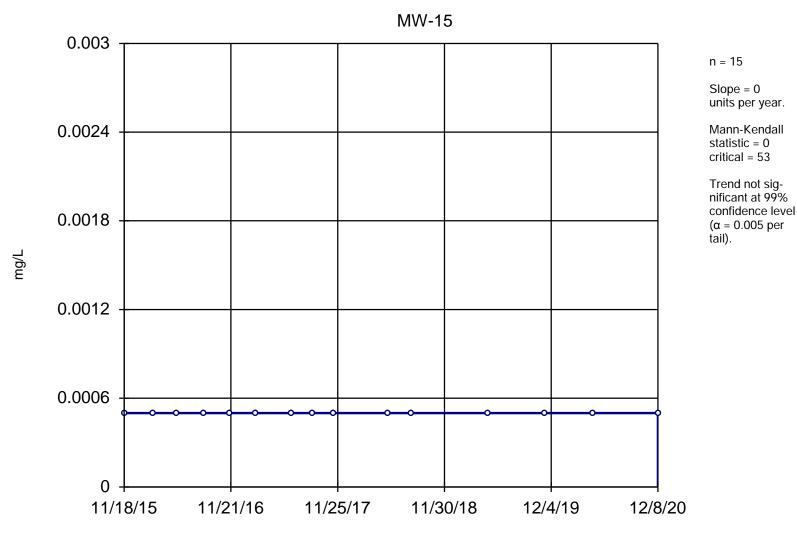
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



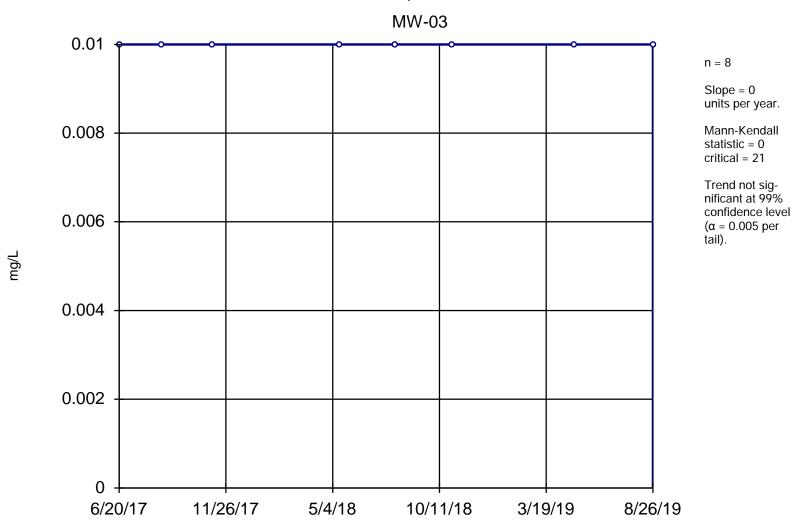
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



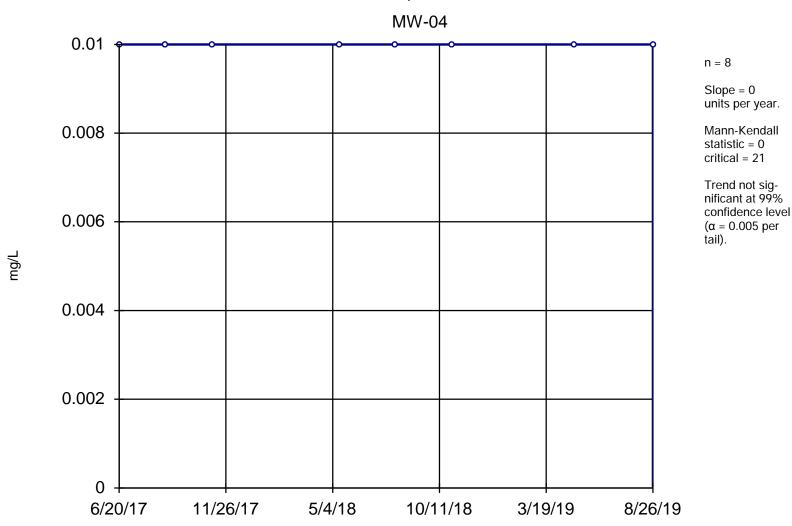
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



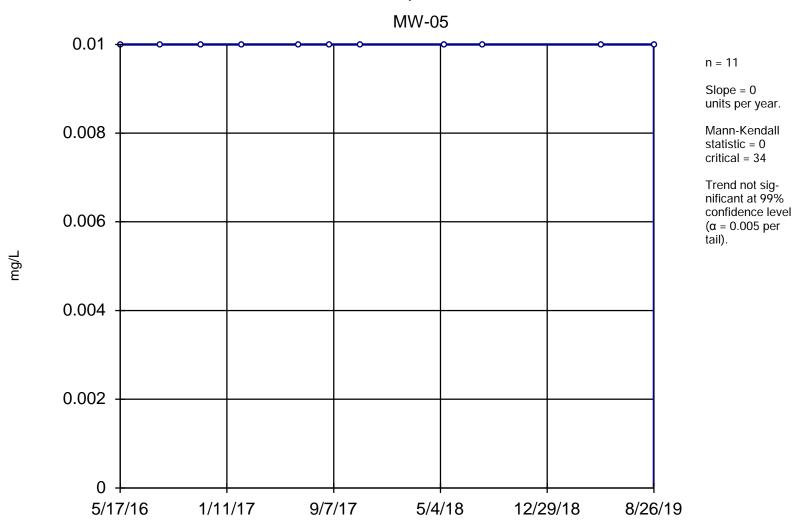
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



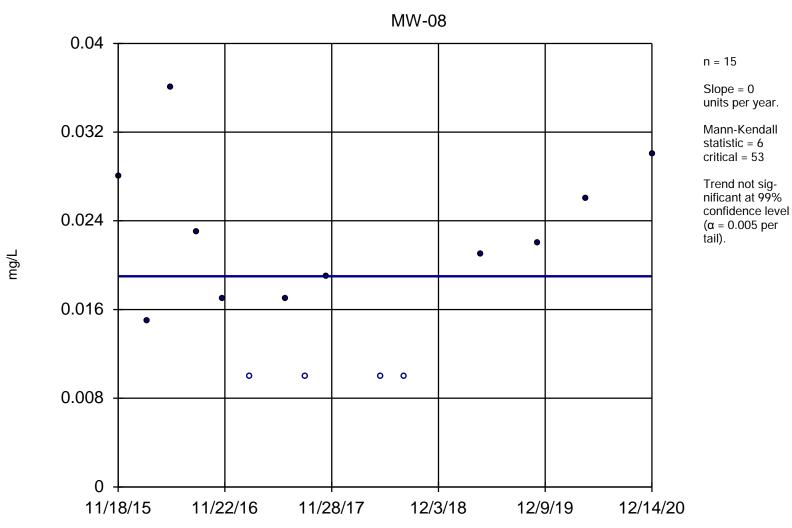
Constituent: Lithium, Total Analysis Run 4/2/2021 11:46 AM



Constituent: Lithium, Total Analysis Run 4/2/2021 11:46 AM

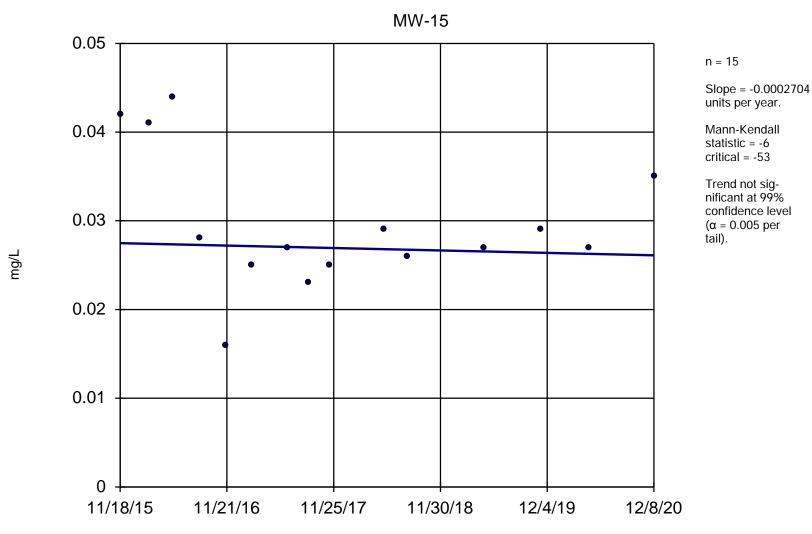


Constituent: Lithium, Total Analysis Run 4/2/2021 11:46 AM



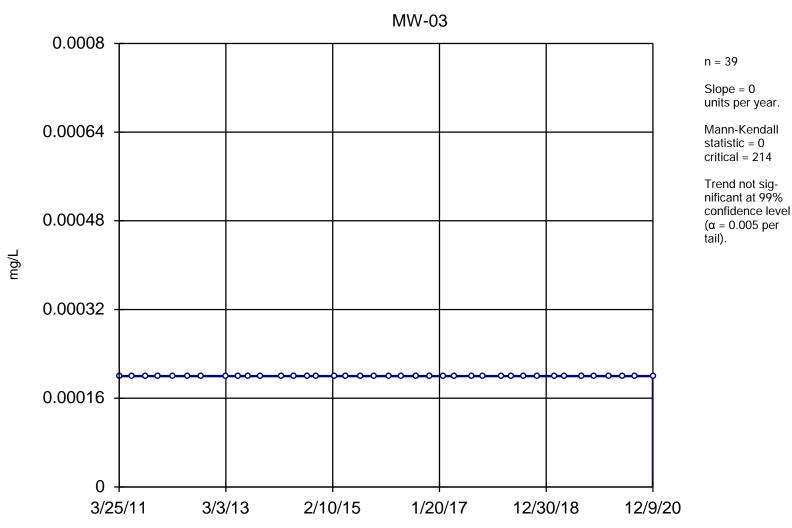
Constituent: Lithium, Total Analysis Run 4/2/2021 11:46 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

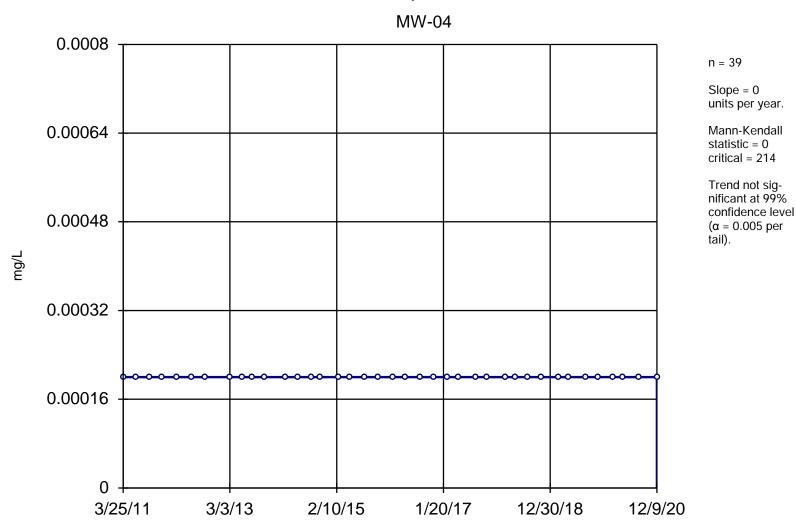


Constituent: Lithium, Total Analysis Run 4/2/2021 11:46 AM

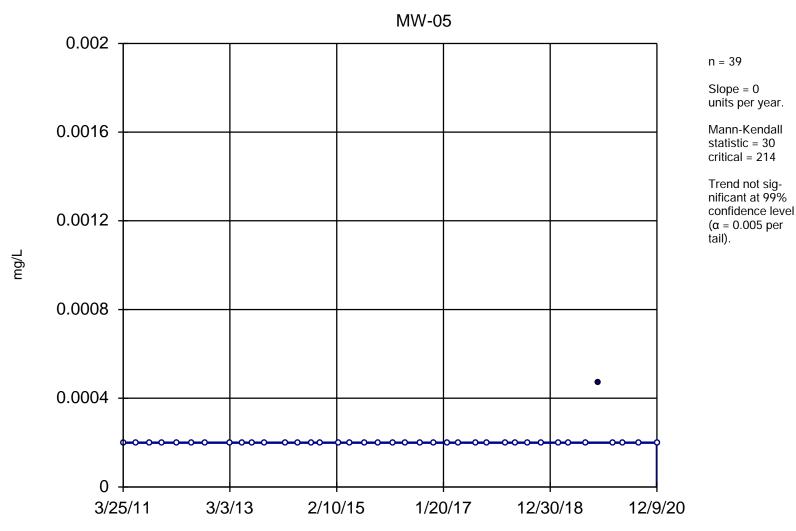
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



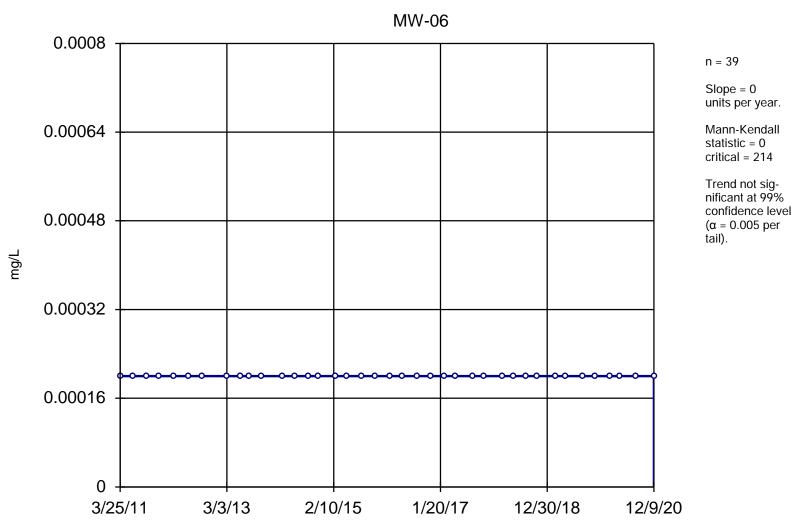
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:46 AM



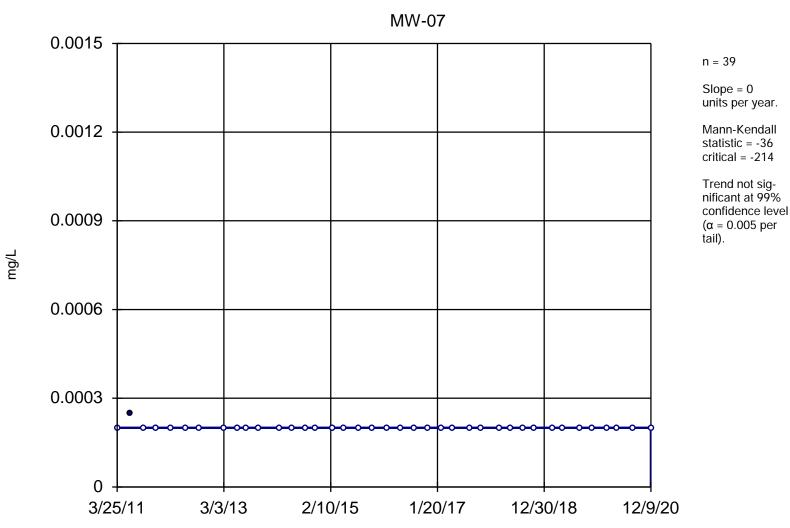
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:46 AM



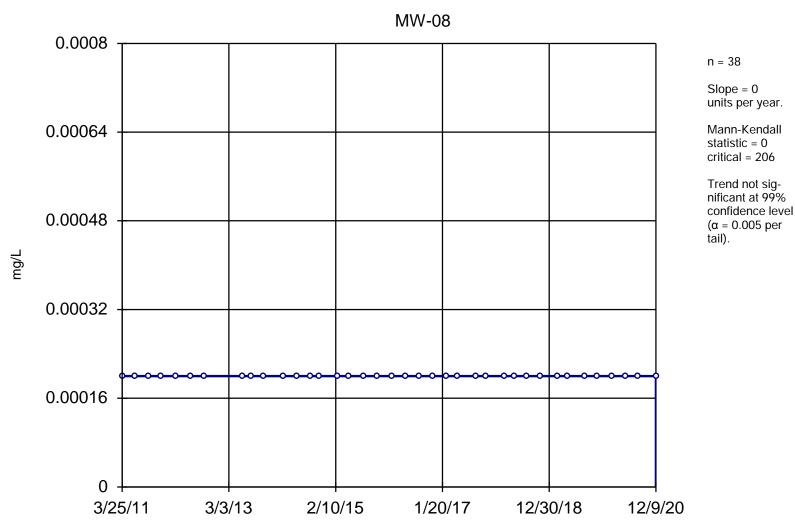
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:46 AM



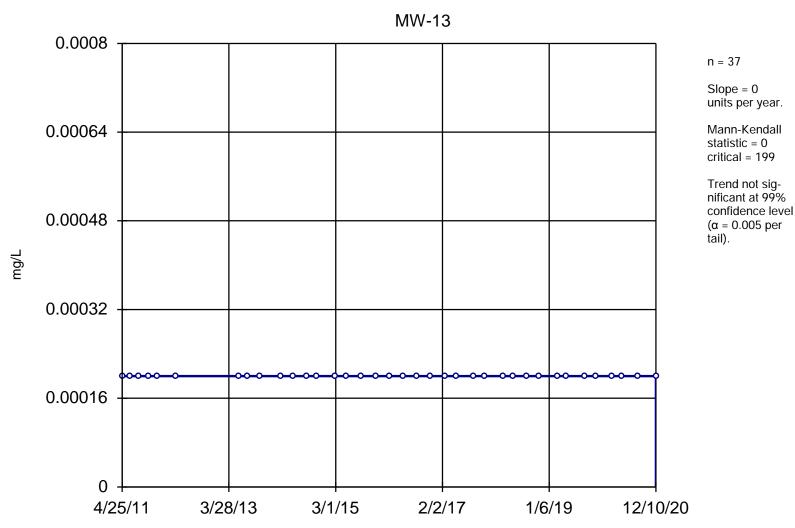
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:46 AM



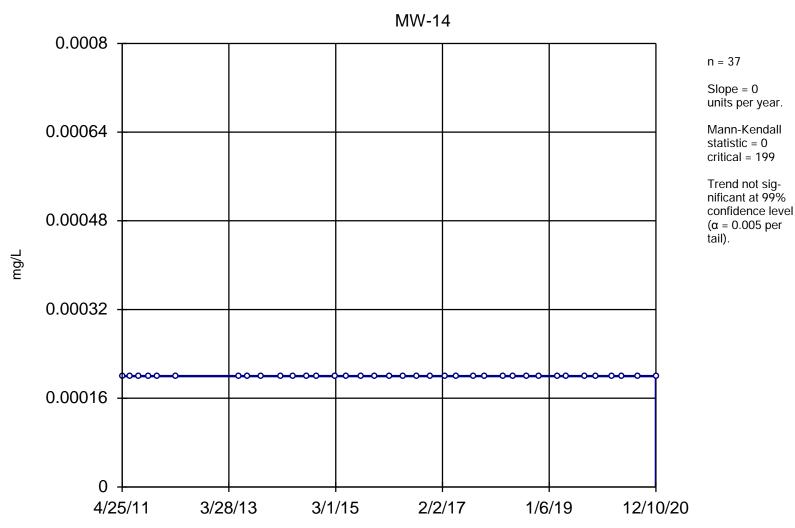
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:46 AM



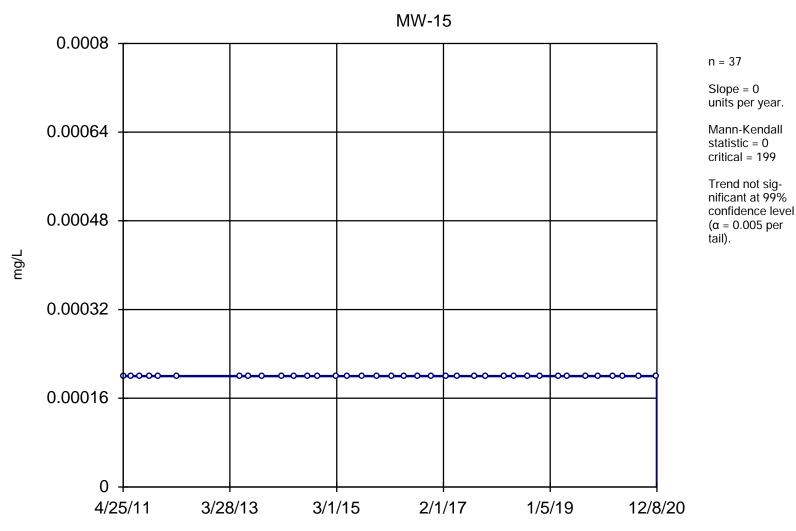
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:46 AM



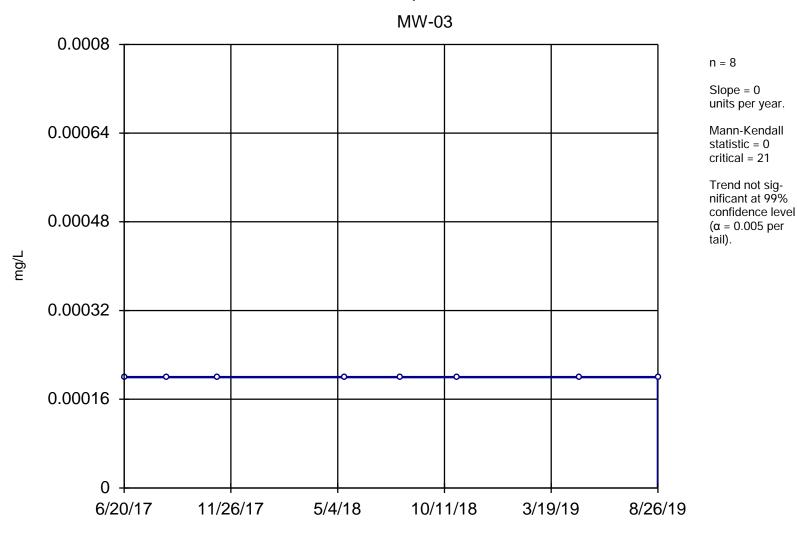
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:46 AM



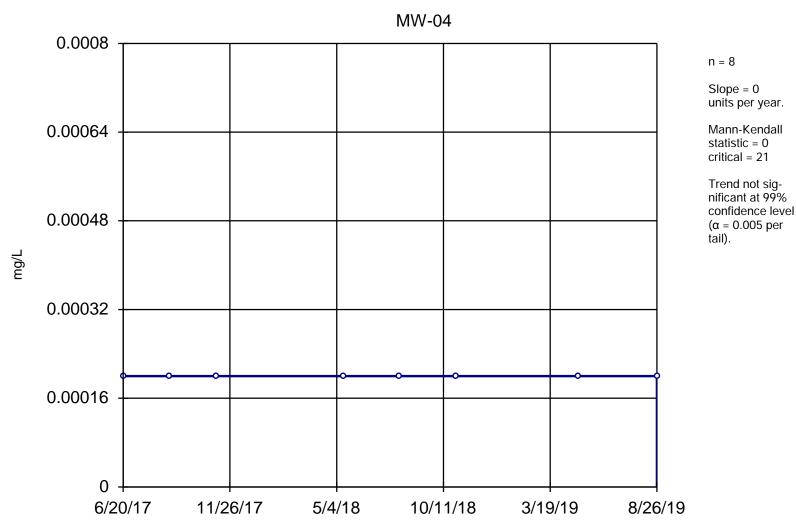
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:46 AM



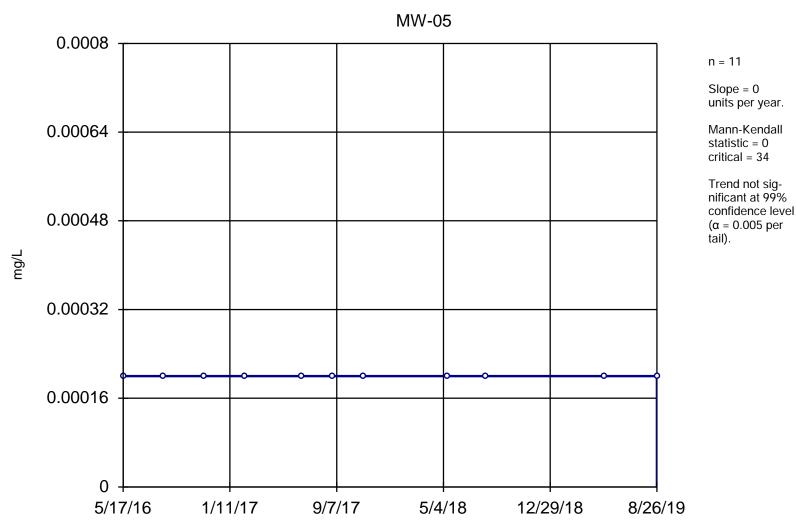
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 11:46 AM



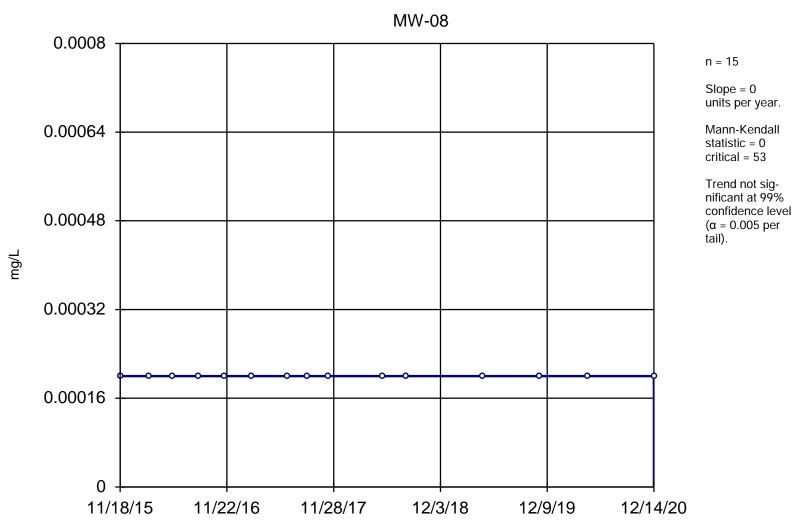
Constituent: Mercury, Total Analysis Run 4/2/2021 11:46 AM



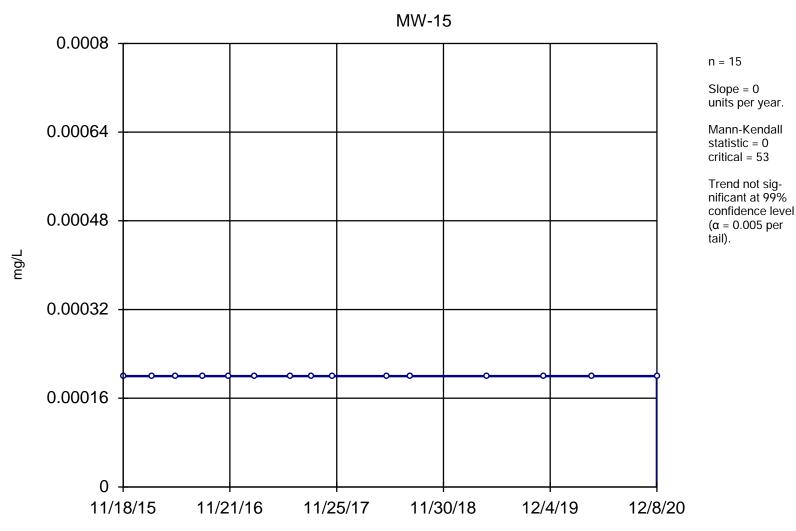
Constituent: Mercury, Total Analysis Run 4/2/2021 11:46 AM



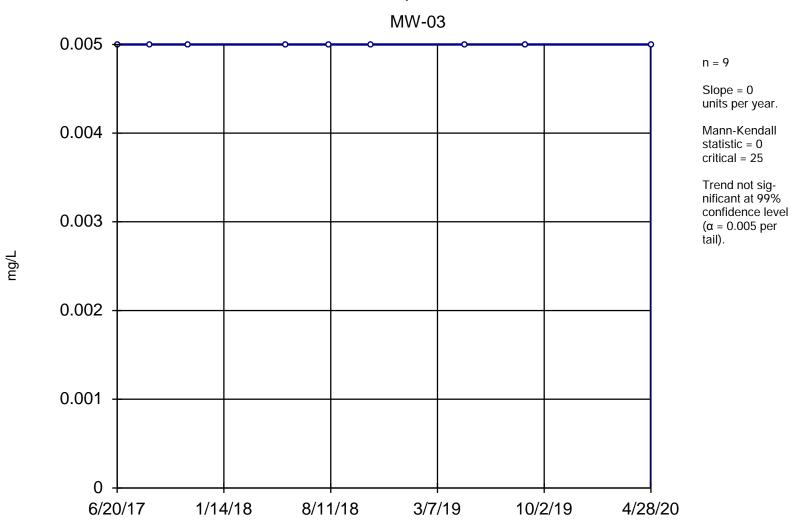
Constituent: Mercury, Total Analysis Run 4/2/2021 11:46 AM



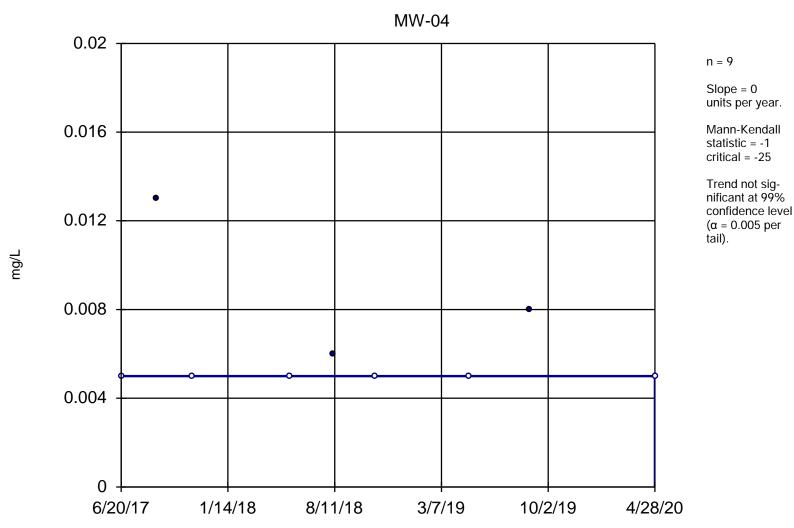
Constituent: Mercury, Total Analysis Run 4/2/2021 11:46 AM



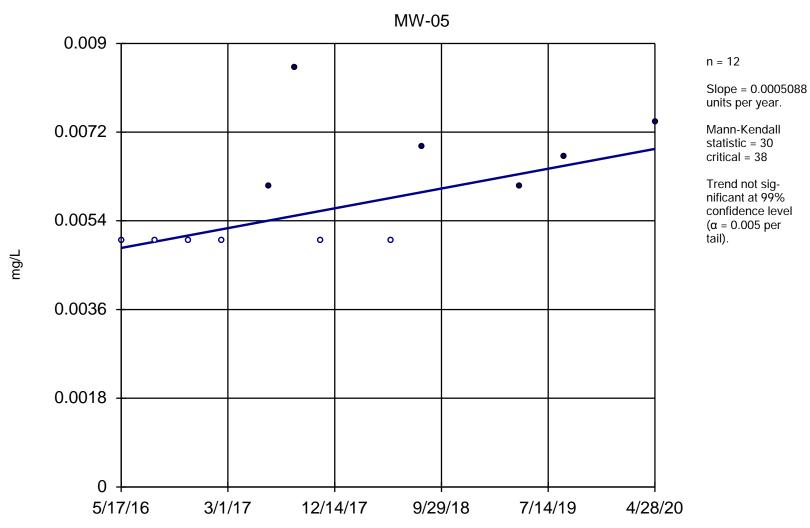
Constituent: Mercury, Total Analysis Run 4/2/2021 11:46 AM



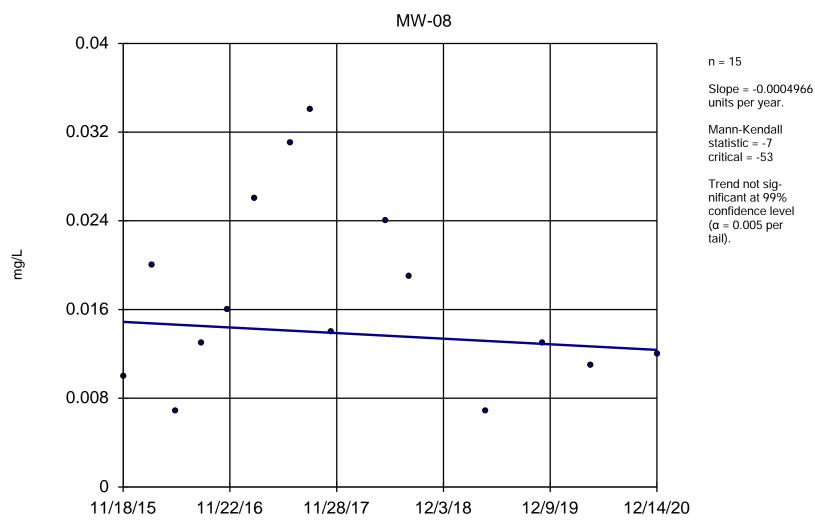
Constituent: Molybdenum, Total Analysis Run 4/2/2021 11:46 AM



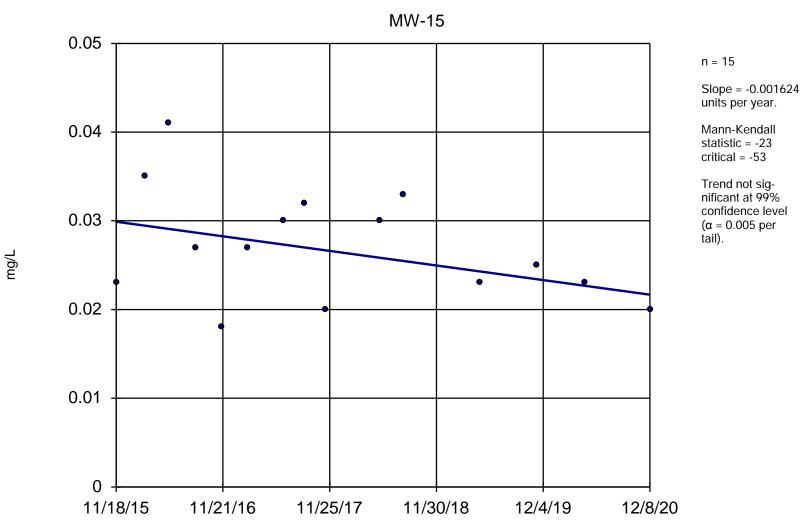
Constituent: Molybdenum, Total Analysis Run 4/2/2021 11:46 AM



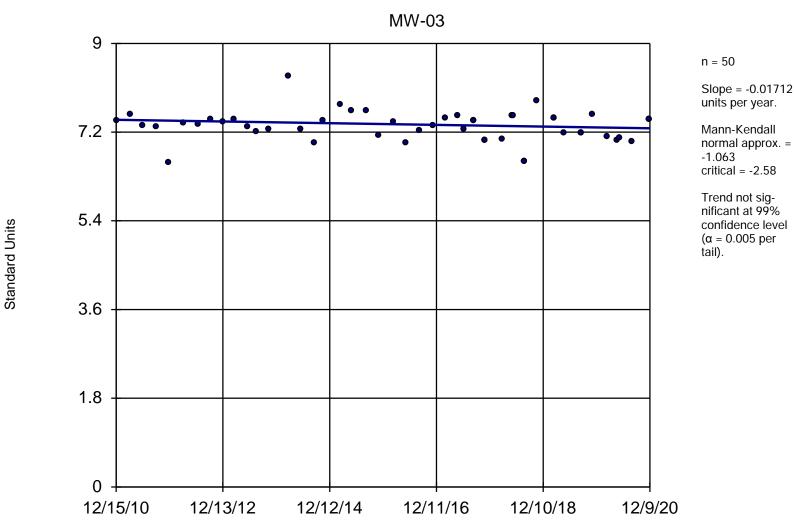
Constituent: Molybdenum, Total Analysis Run 4/2/2021 11:46 AM



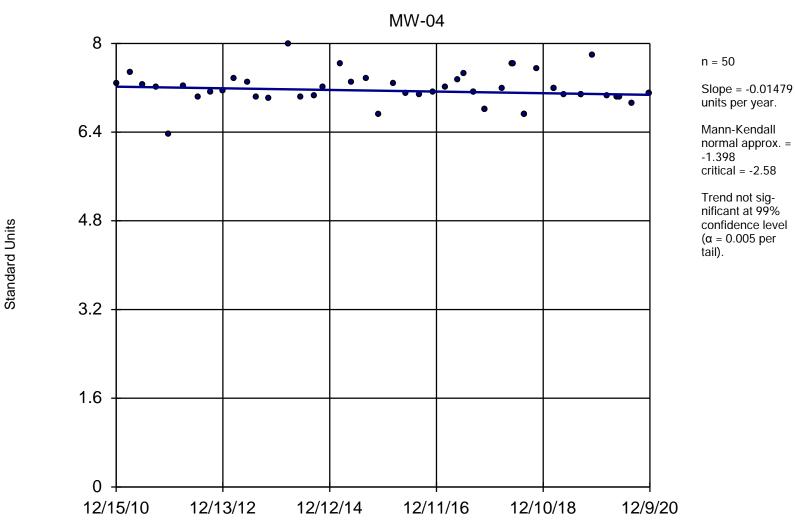
Constituent: Molybdenum, Total Analysis Run 4/2/2021 11:46 AM



Constituent: Molybdenum, Total Analysis Run 4/2/2021 11:46 AM



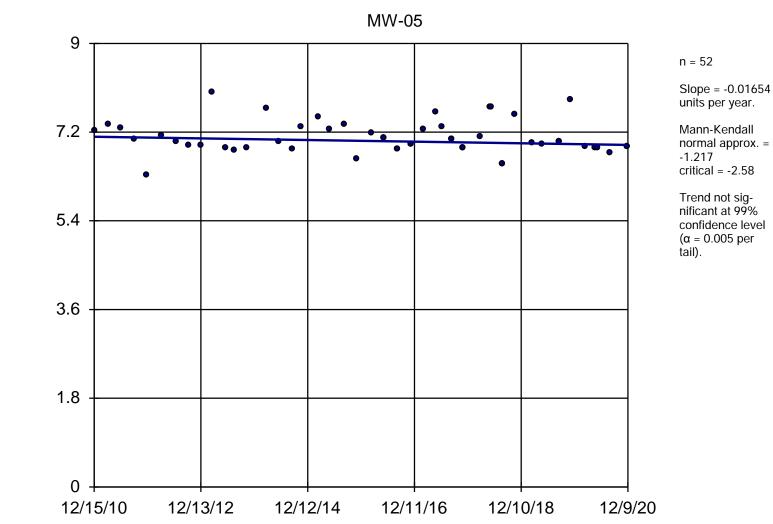
Constituent: pH, Field Analysis Run 4/2/2021 11:46 AM



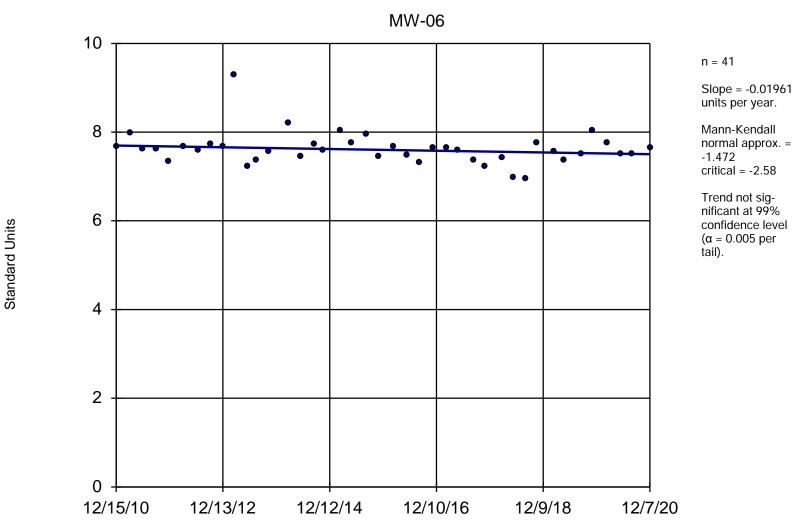
Constituent: pH, Field Analysis Run 4/2/2021 11:46 AM

Standard Units

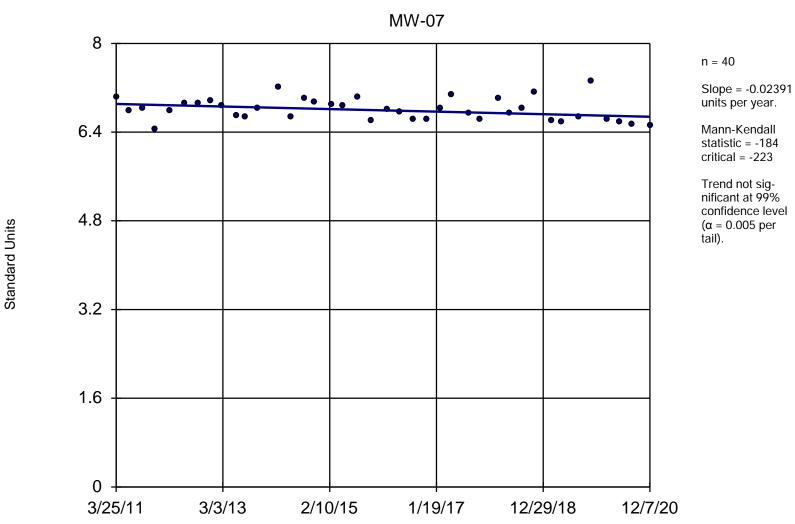
# Sen's Slope Estimator



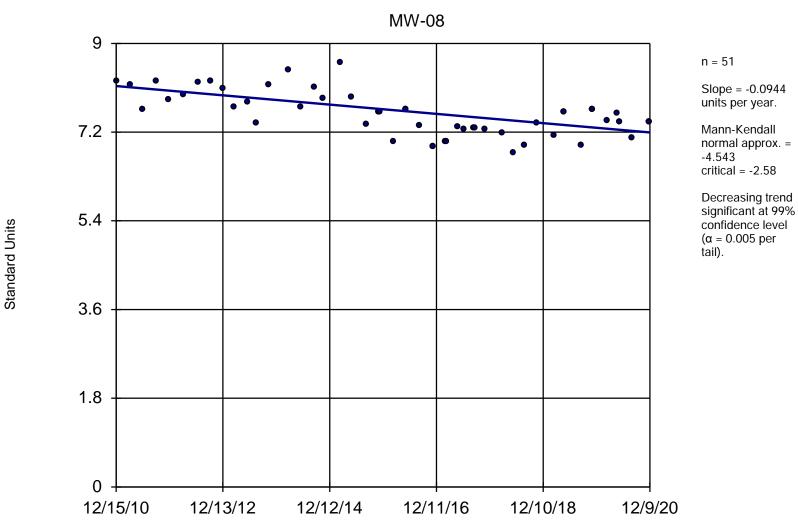
Constituent: pH, Field Analysis Run 4/2/2021 11:46 AM



Constituent: pH, Field Analysis Run 4/2/2021 11:46 AM



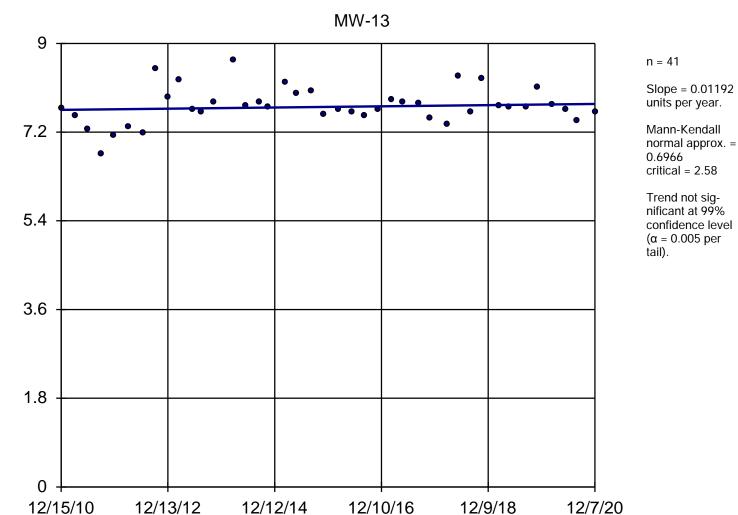
Constituent: pH, Field Analysis Run 4/2/2021 11:46 AM



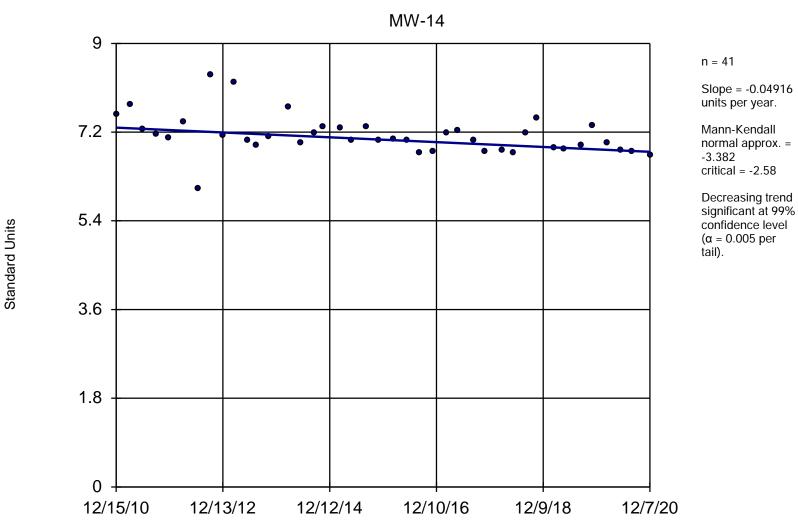
Constituent: pH, Field Analysis Run 4/2/2021 11:46 AM

Standard Units

# Sen's Slope Estimator



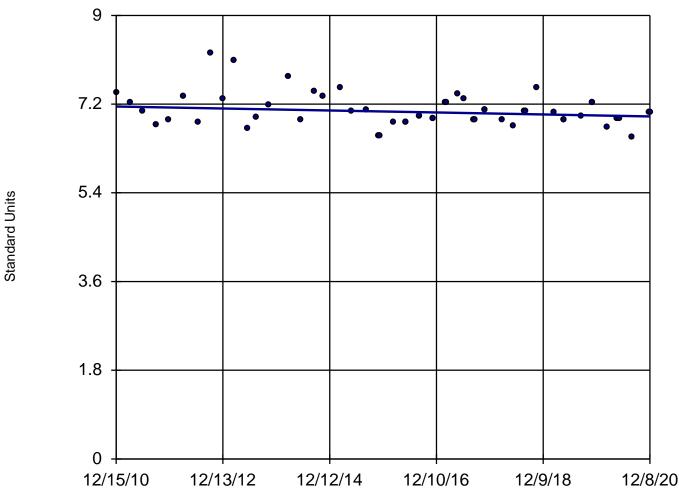
Constituent: pH, Field Analysis Run 4/2/2021 11:46 AM



Constituent: pH, Field Analysis Run 4/2/2021 11:46 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database





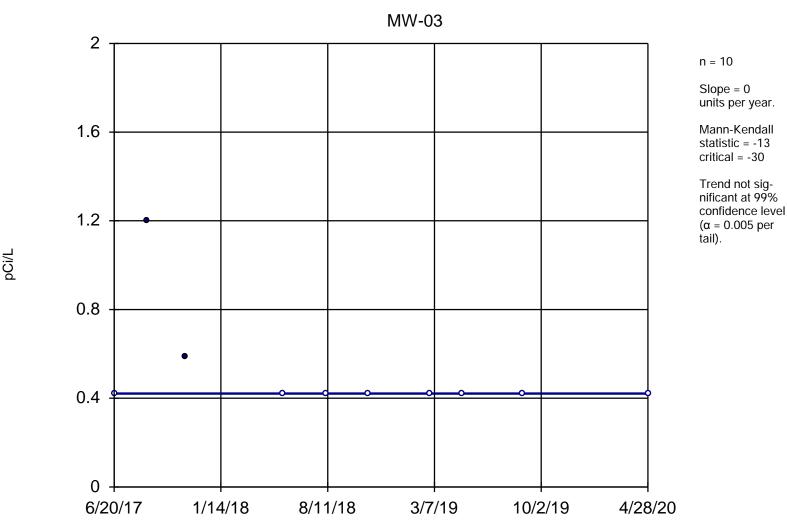
n = 54

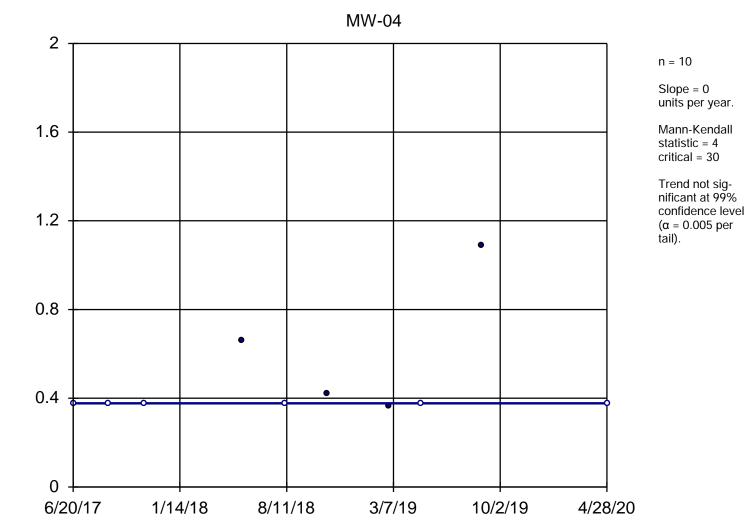
Slope = -0.01994 units per year.

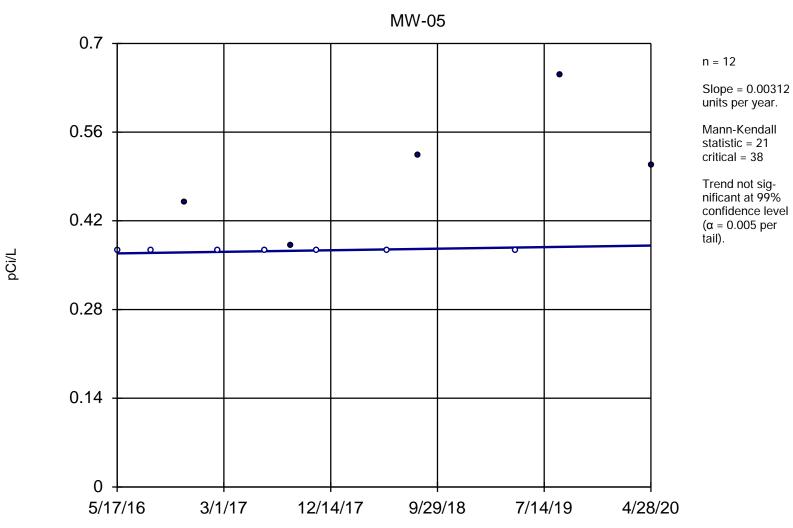
Mann-Kendall normal approx. = -1.456 critical = -2.58

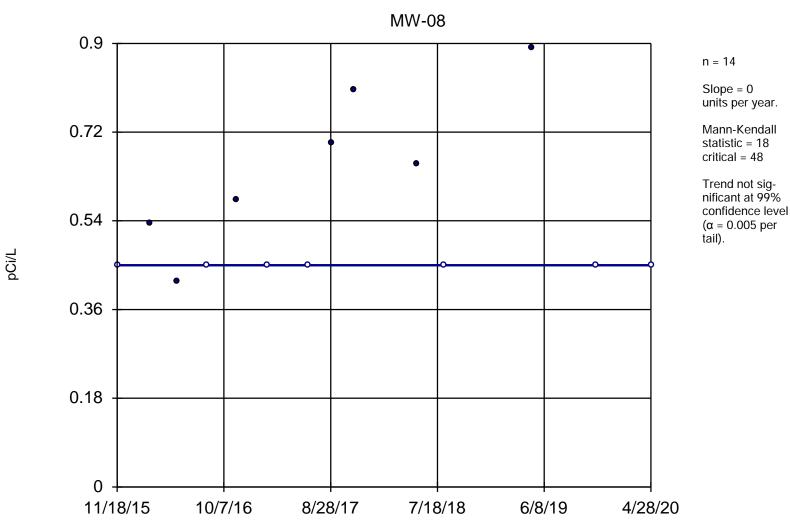
Trend not significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

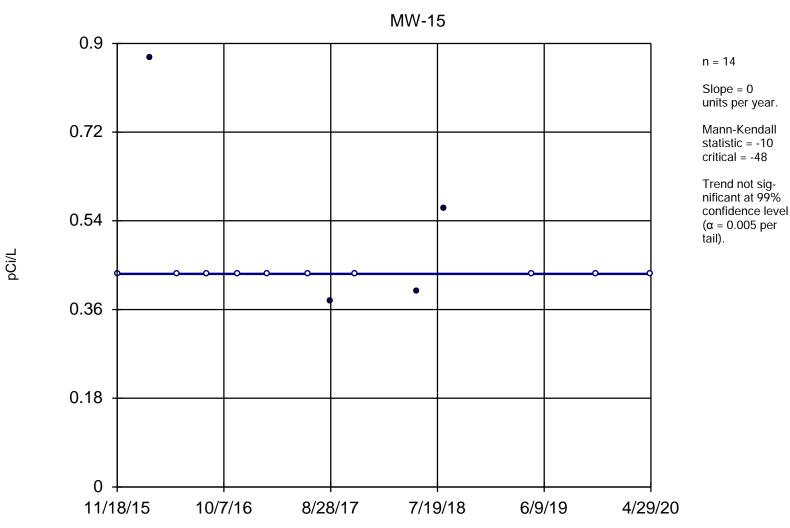
Constituent: pH, Field Analysis Run 4/2/2021 11:46 AM



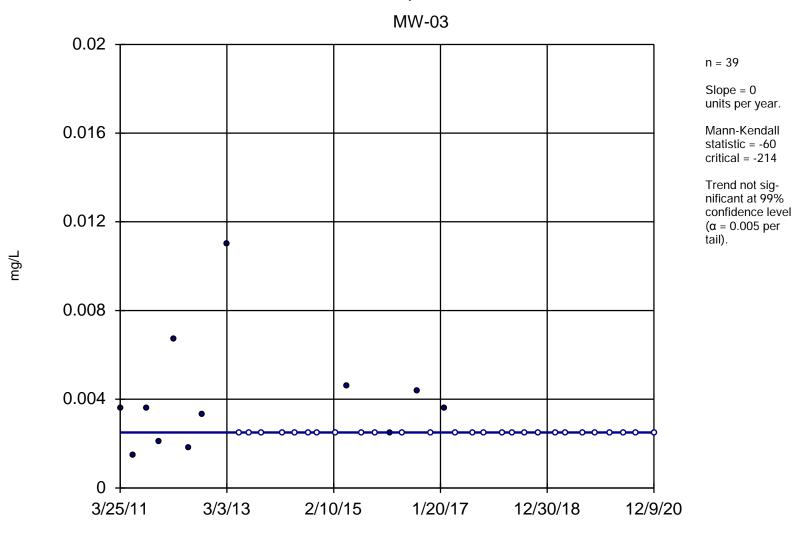




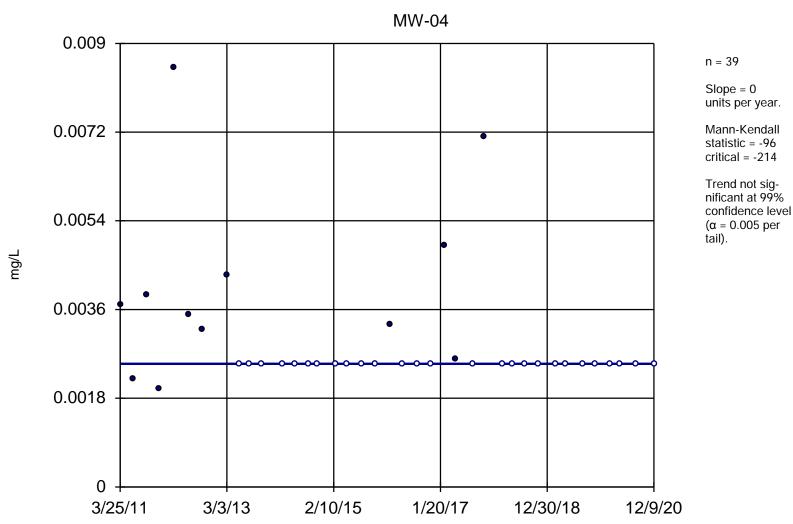




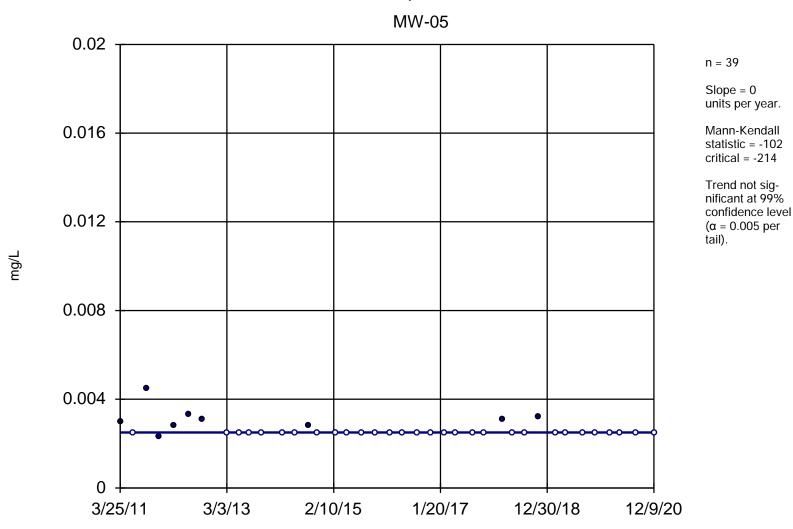
Constituent: Radium 226 + Radium 228, Combined Analysis Run 4/2/2021 11:46 AM Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



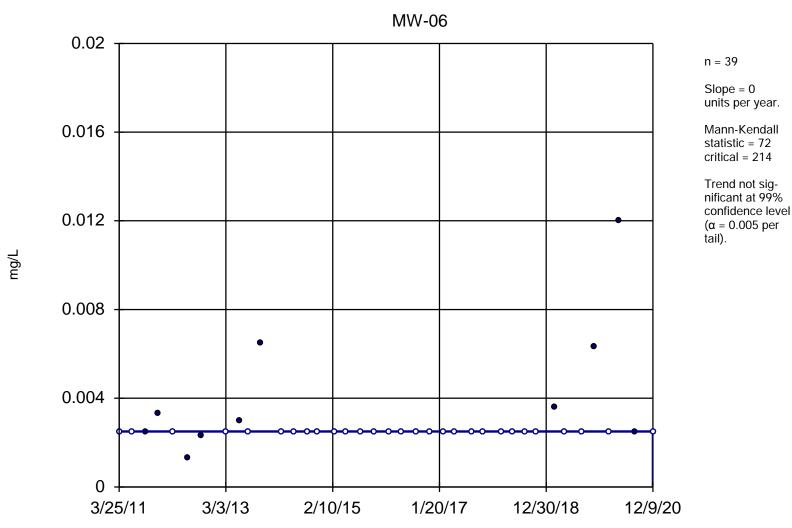
Constituent: Selenium, Dissolved Analysis Run 4/2/2021 11:46 AM



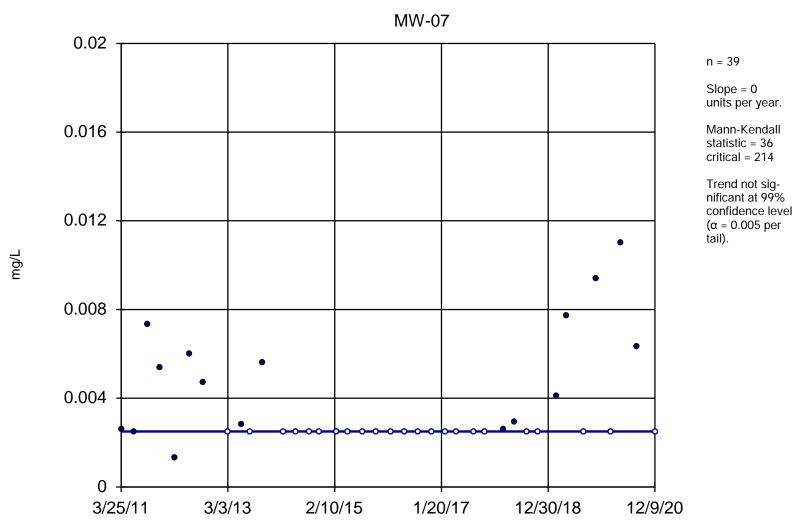
Constituent: Selenium, Dissolved Analysis Run 4/2/2021 11:46 AM



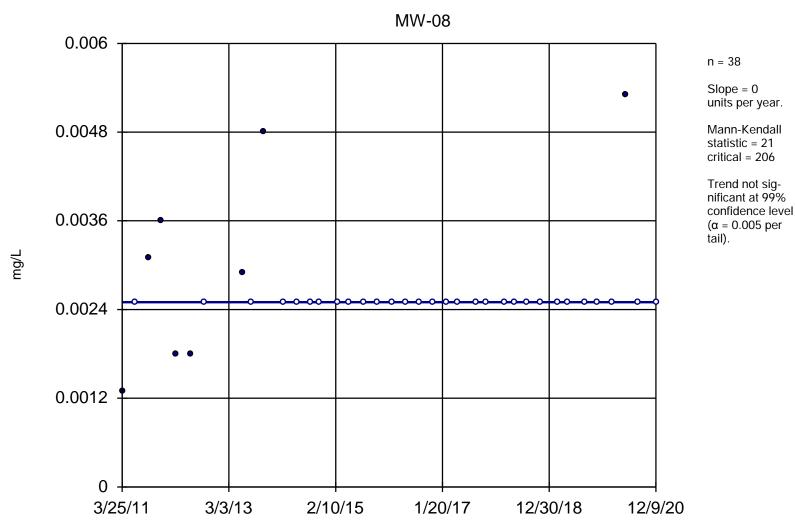
Constituent: Selenium, Dissolved Analysis Run 4/2/2021 11:46 AM



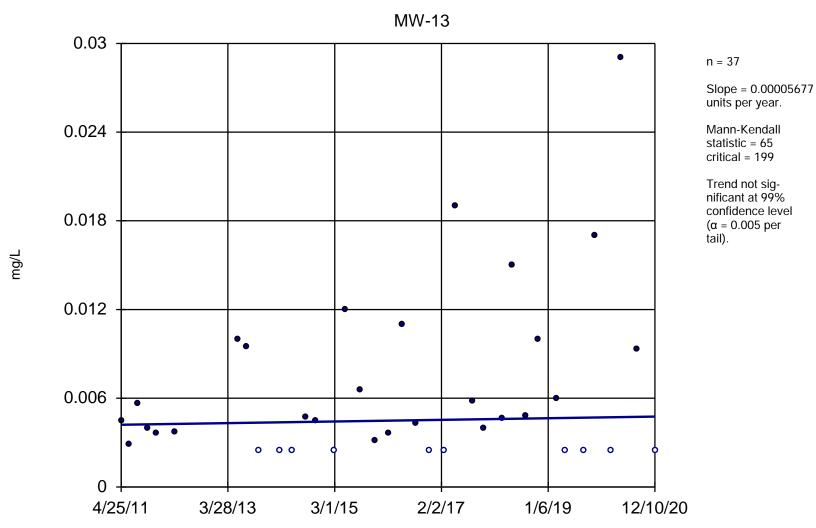
Constituent: Selenium, Dissolved Analysis Run 4/2/2021 11:46 AM



Constituent: Selenium, Dissolved Analysis Run 4/2/2021 11:46 AM

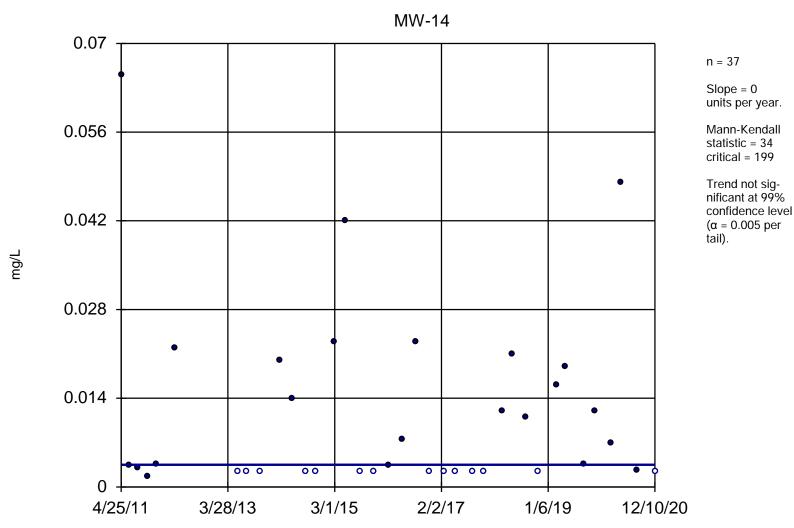


Constituent: Selenium, Dissolved Analysis Run 4/2/2021 11:46 AM
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

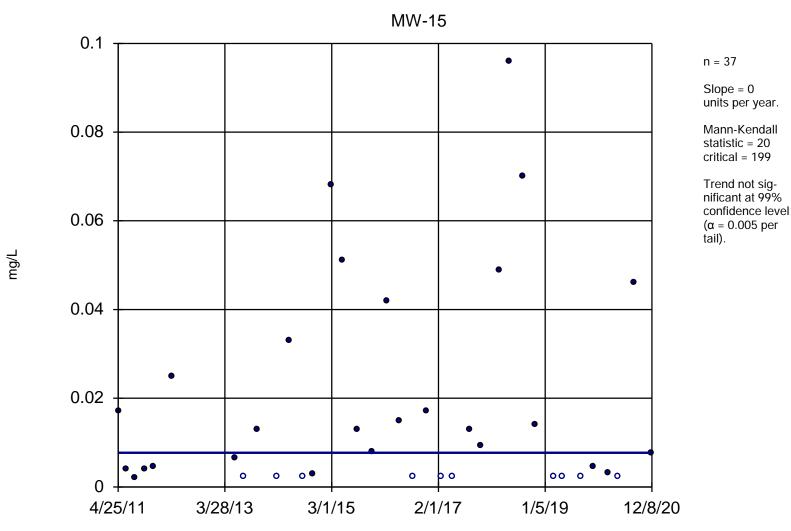


Constituent: Selenium, Dissolved Analysis Run 4/2/2021 11:46 AM

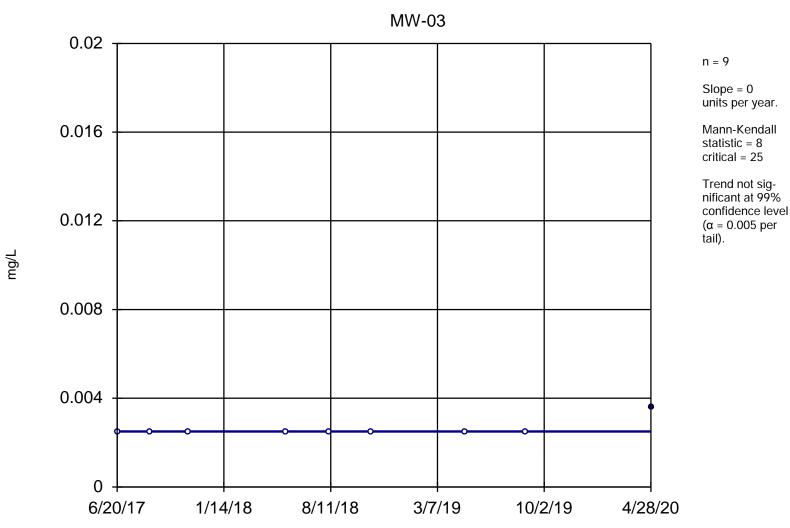
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



Constituent: Selenium, Dissolved Analysis Run 4/2/2021 11:46 AM

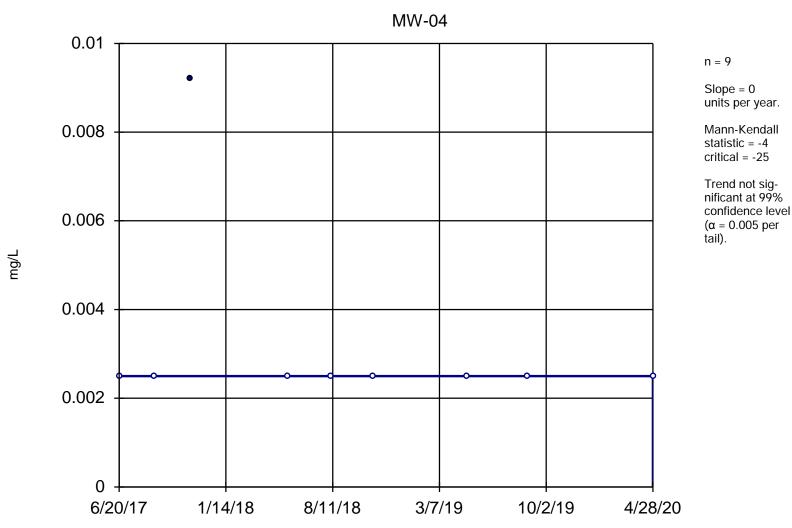


Constituent: Selenium, Dissolved Analysis Run 4/2/2021 11:46 AM

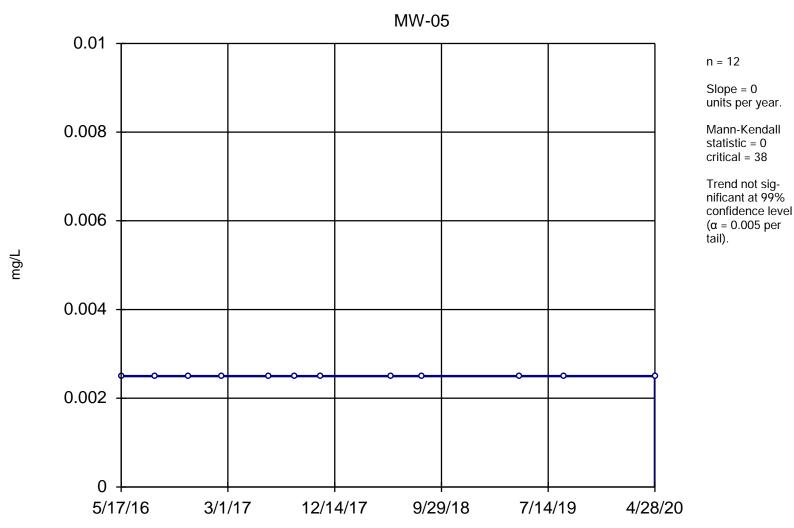


Constituent: Selenium, Total Analysis Run 4/2/2021 11:46 AM

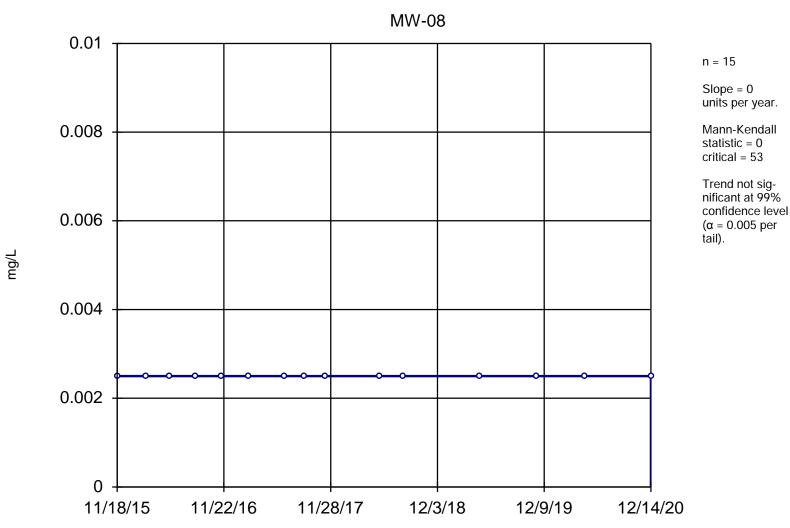
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



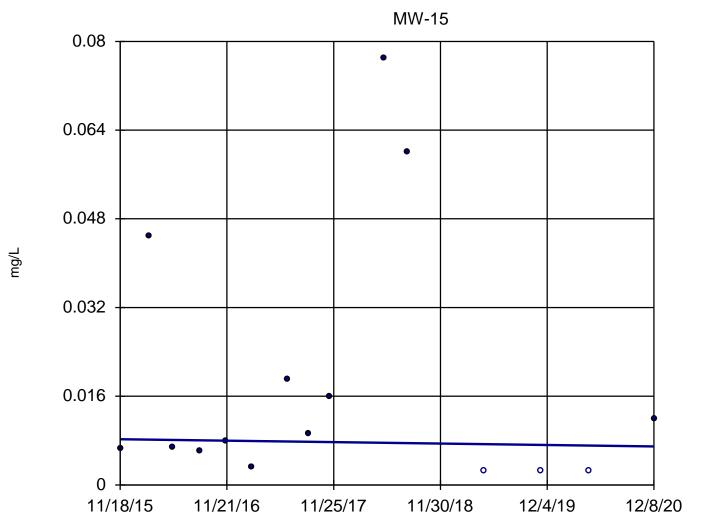
Constituent: Selenium, Total Analysis Run 4/2/2021 11:46 AM



Constituent: Selenium, Total Analysis Run 4/2/2021 11:47 AM



Constituent: Selenium, Total Analysis Run 4/2/2021 11:47 AM



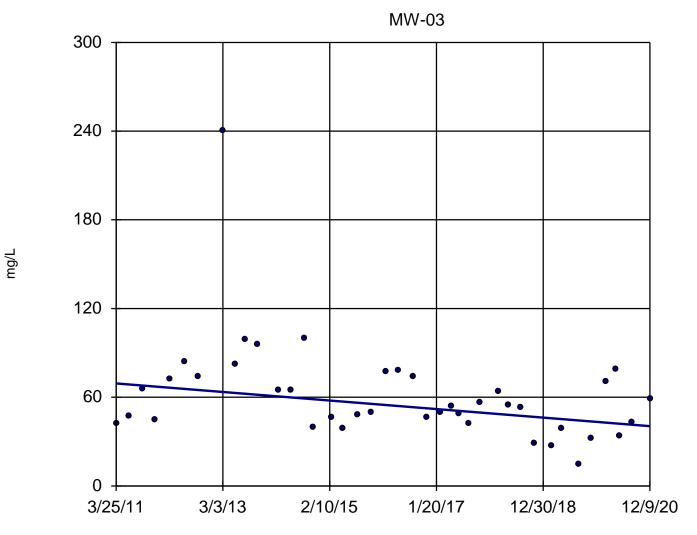
n = 15

Slope = -0.0002555 units per year.

Mann-Kendall statistic = -6 critical = -53

Trend not significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

Constituent: Selenium, Total Analysis Run 4/2/2021 11:47 AM



n = 41

Slope = -2.97 units per year.

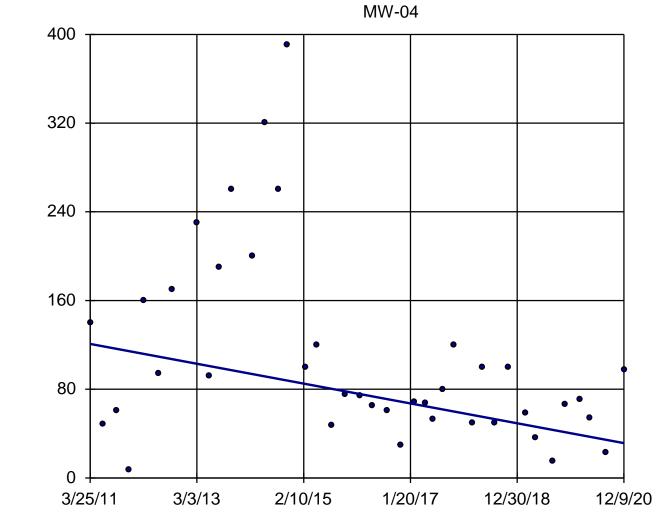
Mann-Kendall normal approx. = -2.348 critical = -2.58

Trend not significant at 99% confidence level ( $\alpha = 0.005$  per tail).

Constituent: Sulfate Analysis Run 4/2/2021 11:47 AM

mg/L

# Sen's Slope Estimator



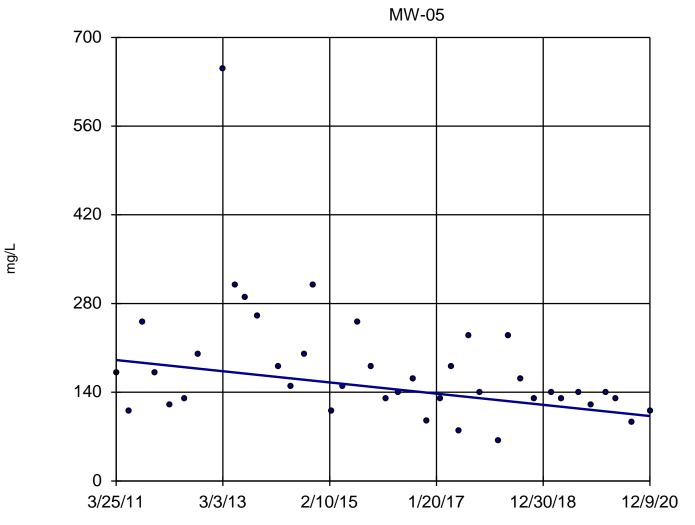
n = 40

Slope = -9.213 units per year.

Mann-Kendall statistic = -219 critical = -223

Trend not significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

Constituent: Sulfate Analysis Run 4/2/2021 11:47 AM



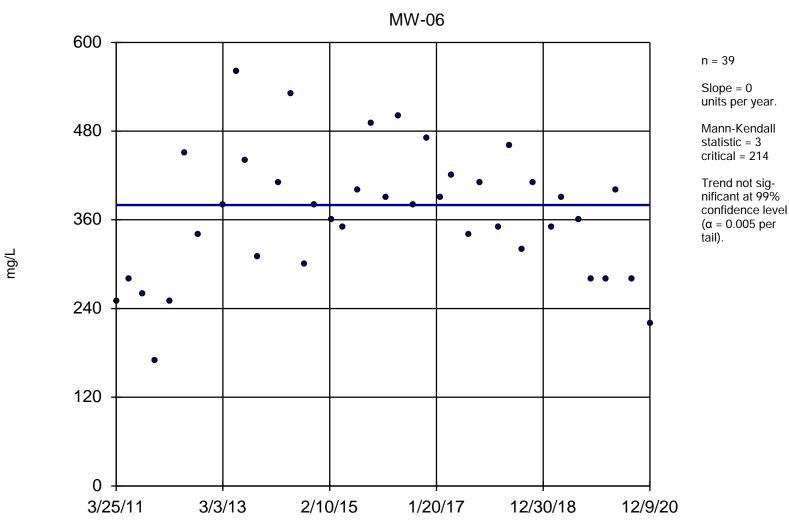
n = 40

Slope = -9.096 units per year.

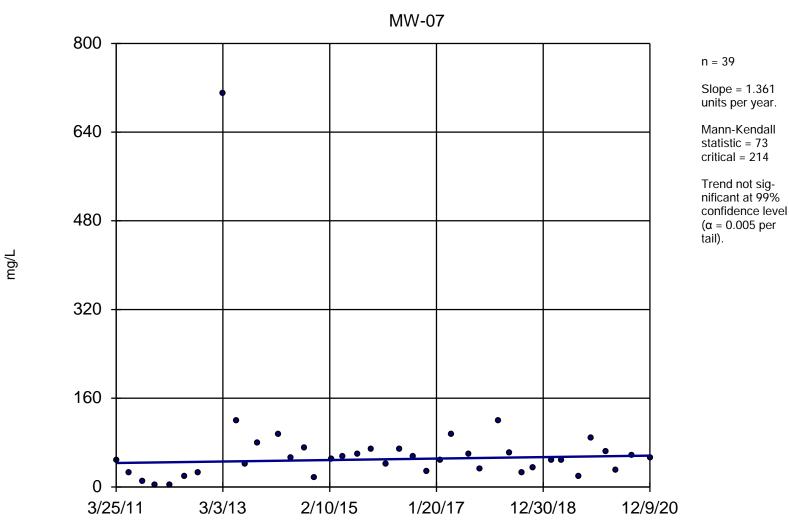
Mann-Kendall statistic = -249 critical = -223

Decreasing trend significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

Constituent: Sulfate Analysis Run 4/2/2021 11:47 AM



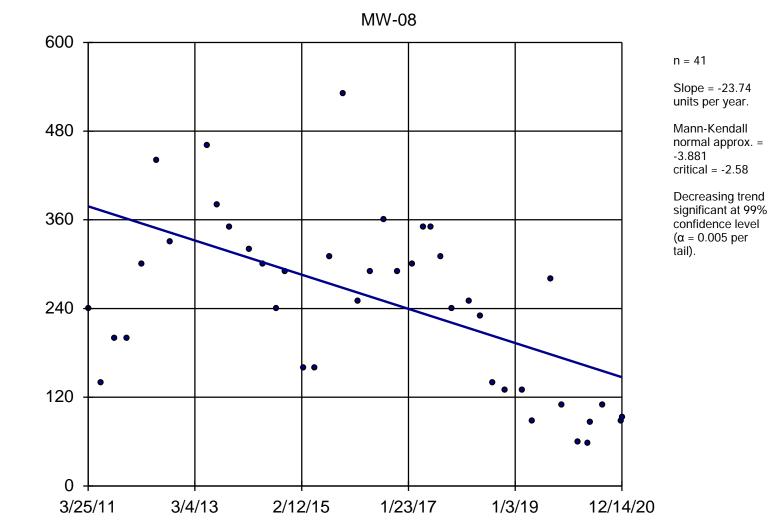
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

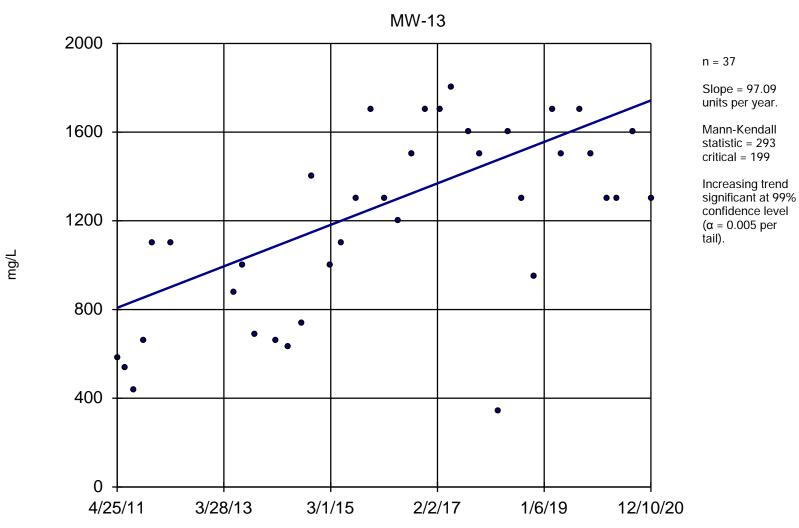
mg/L

# Sen's Slope Estimator

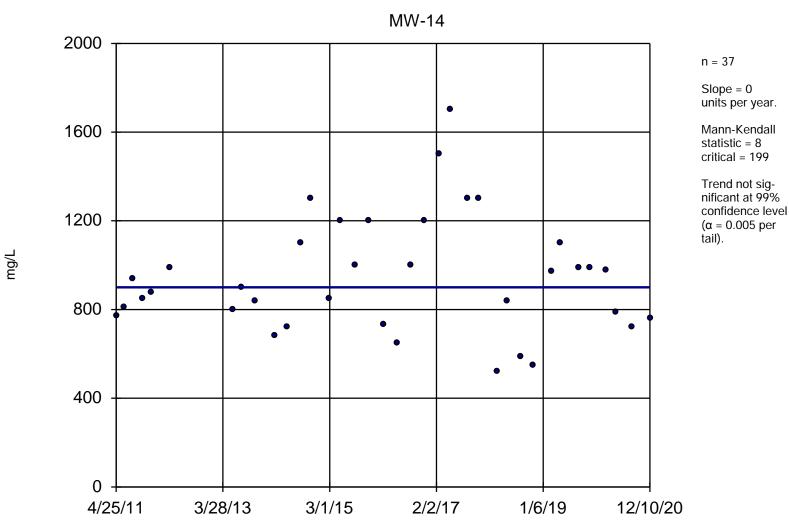


Constituent: Sulfate Analysis Run 4/2/2021 11:47 AM

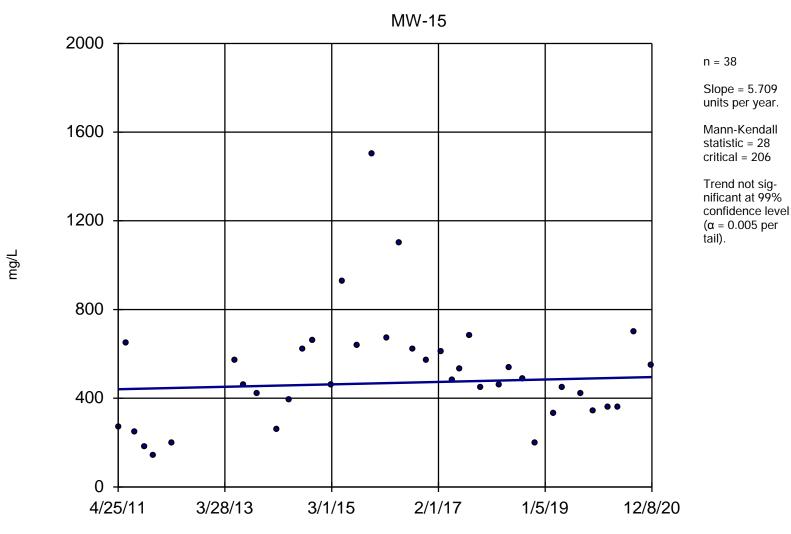
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



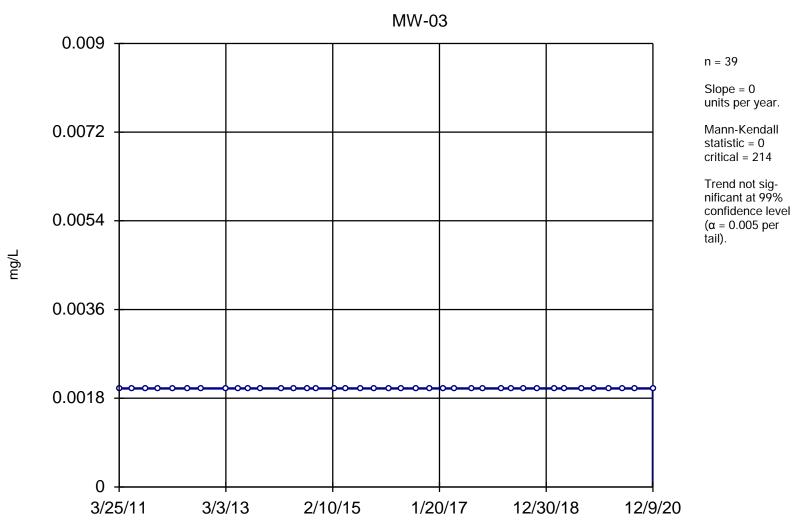
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



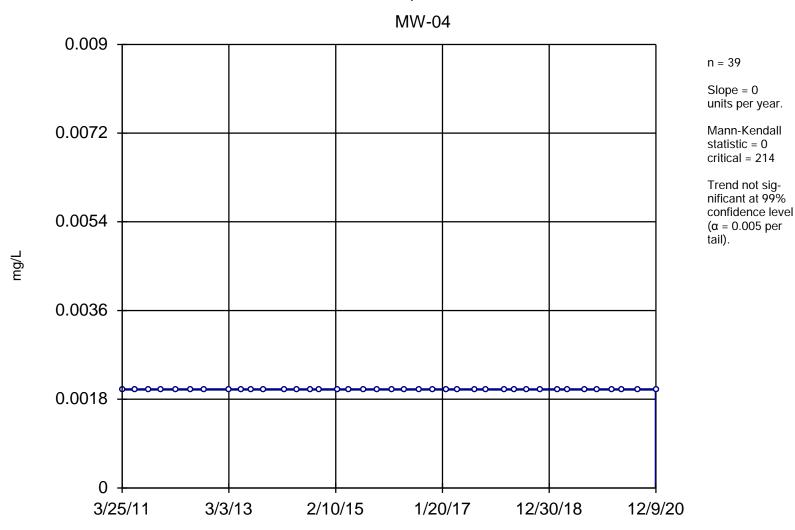
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



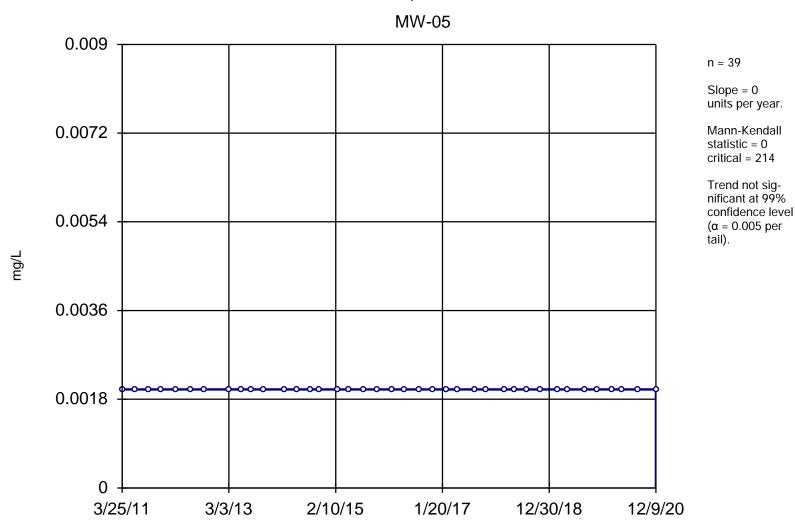
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



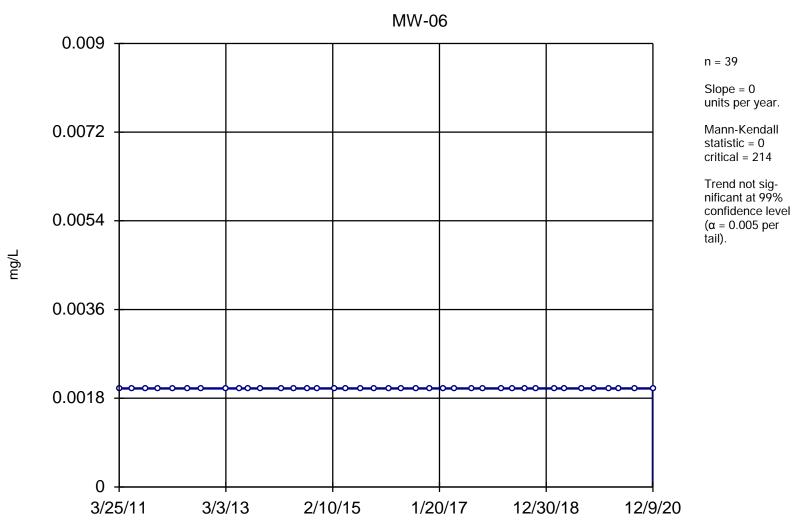
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 11:47 AM



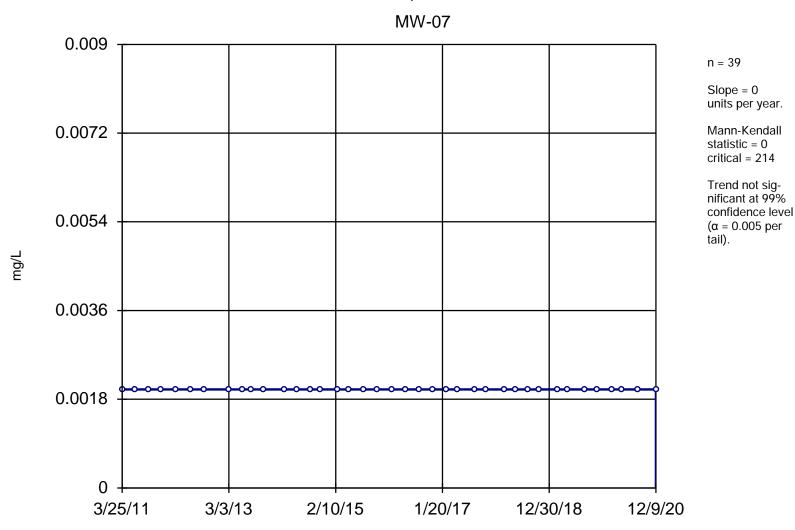
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 11:47 AM



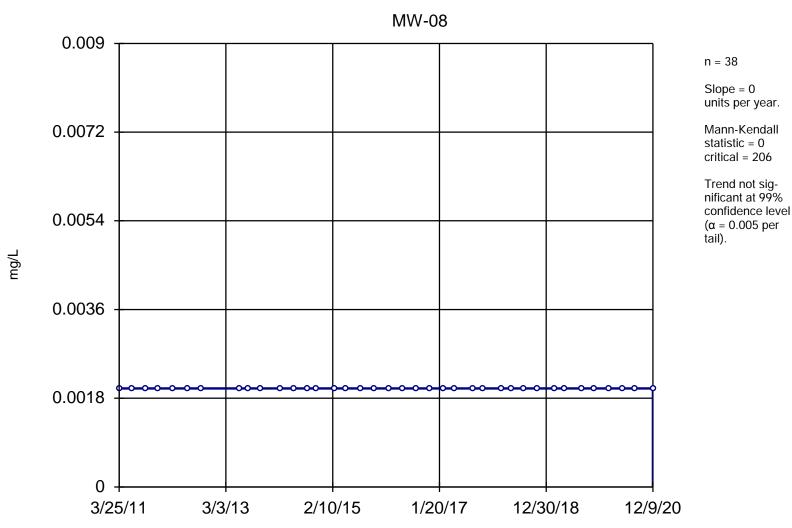
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 11:47 AM



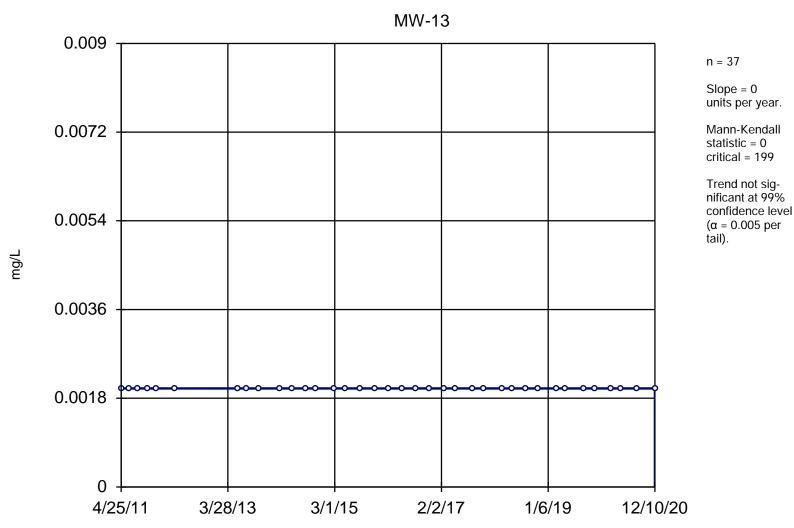
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 11:47 AM



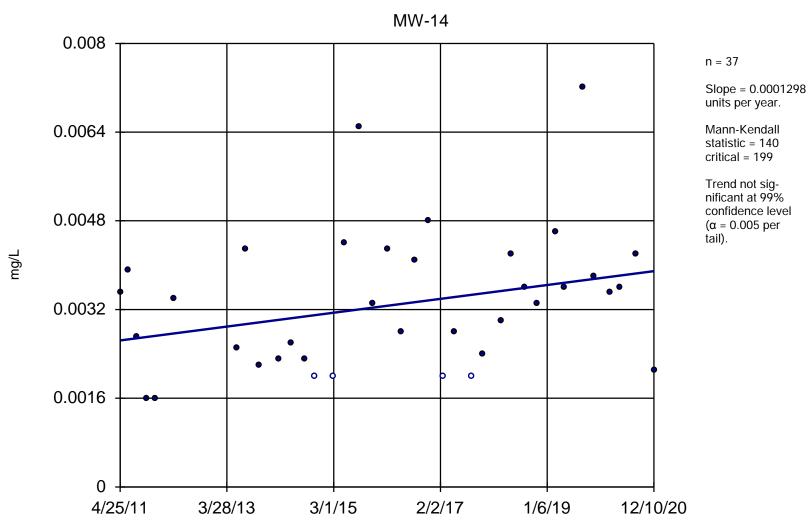
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 11:47 AM



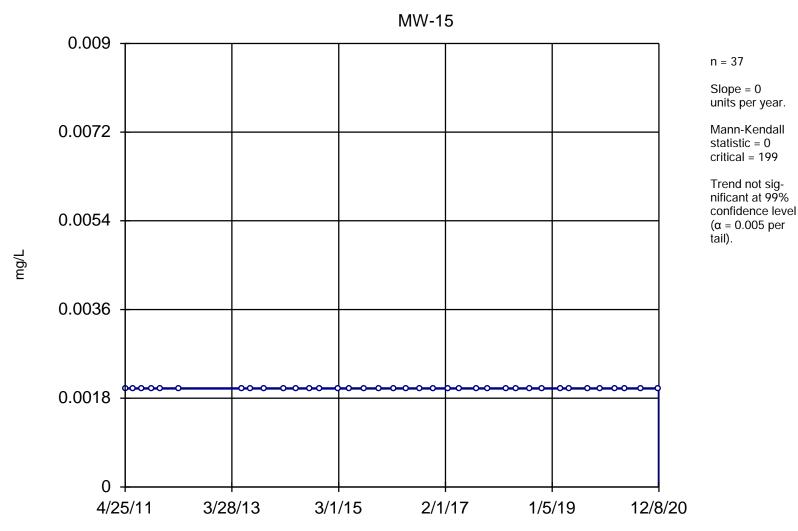
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 11:47 AM



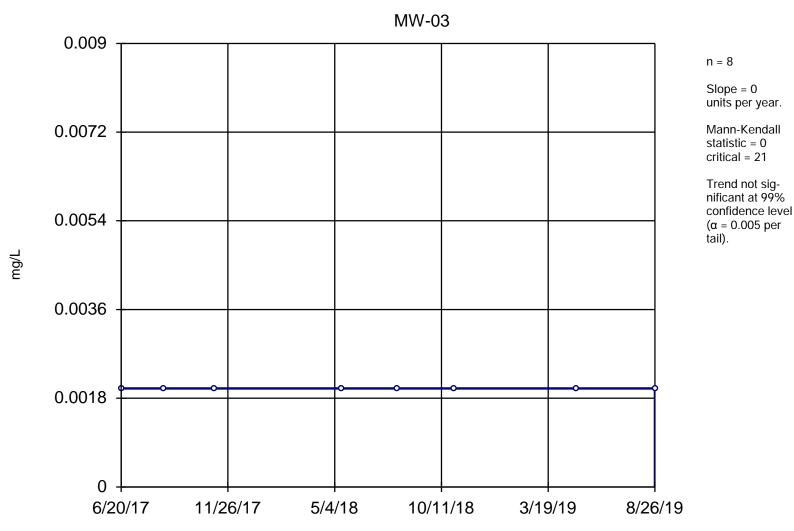
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 11:47 AM



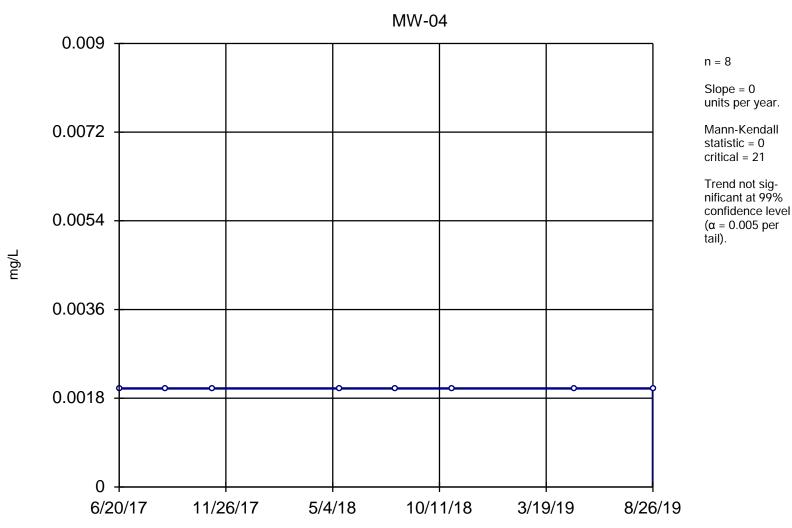
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 11:47 AM



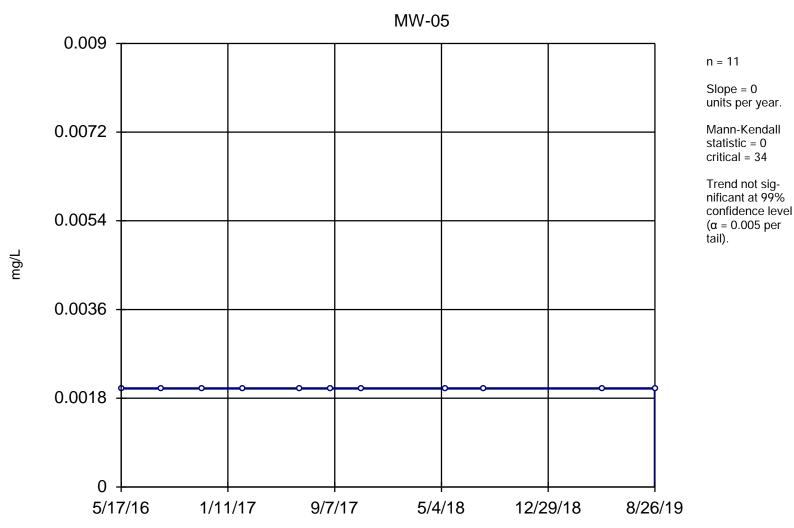
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 11:47 AM



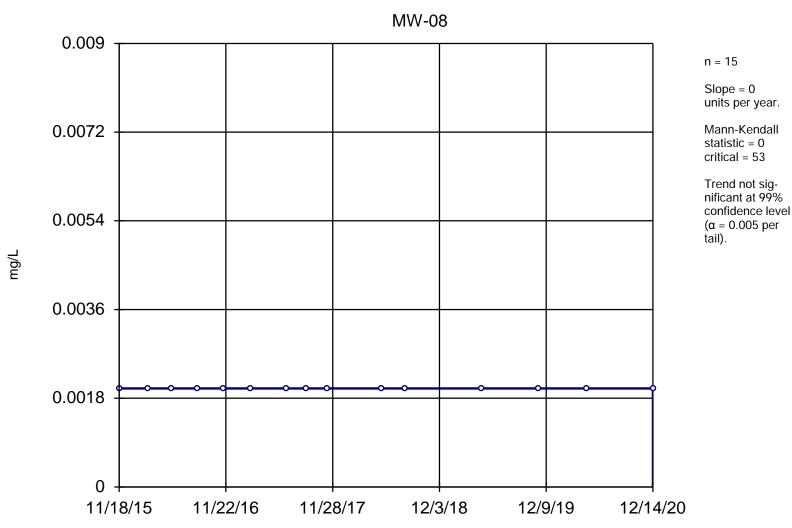
Constituent: Thallium, Total Analysis Run 4/2/2021 11:47 AM



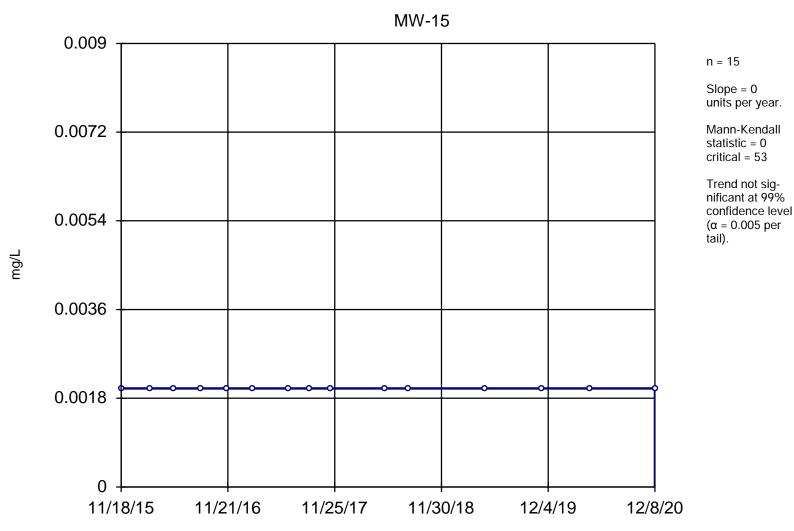
Constituent: Thallium, Total Analysis Run 4/2/2021 11:47 AM



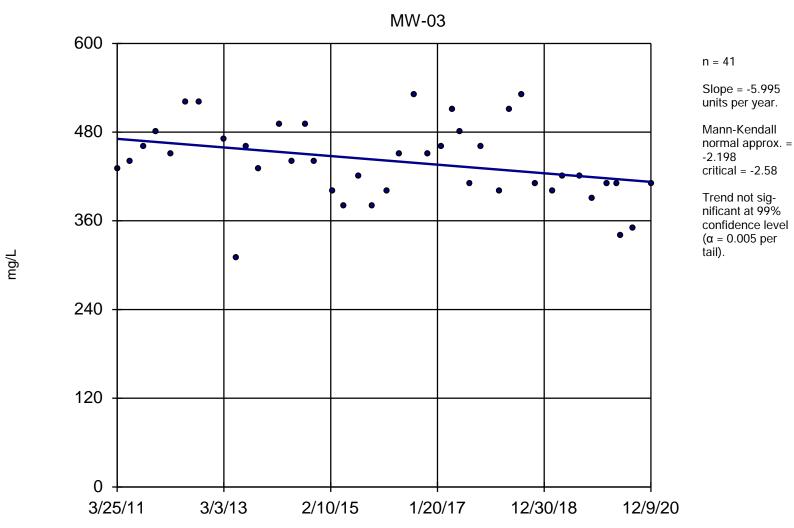
Constituent: Thallium, Total Analysis Run 4/2/2021 11:47 AM



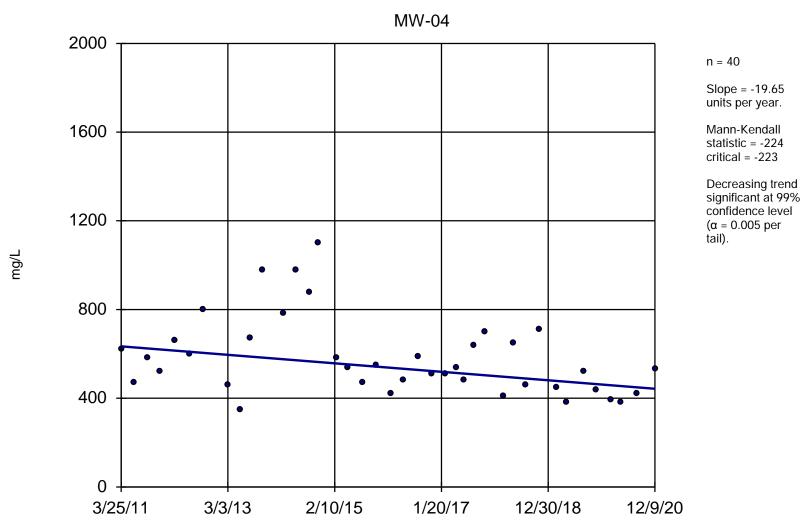
Constituent: Thallium, Total Analysis Run 4/2/2021 11:47 AM



Constituent: Thallium, Total Analysis Run 4/2/2021 11:47 AM

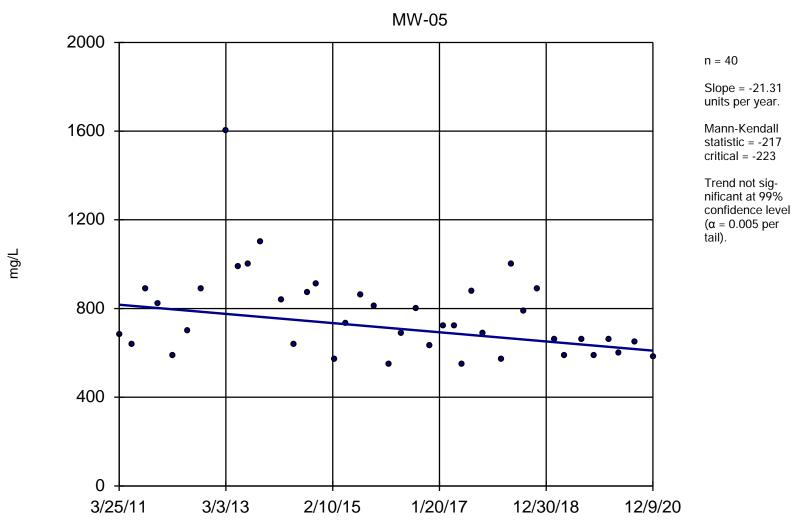


Constituent: Total Dissolved Solids Analysis Run 4/2/2021 11:47 AM

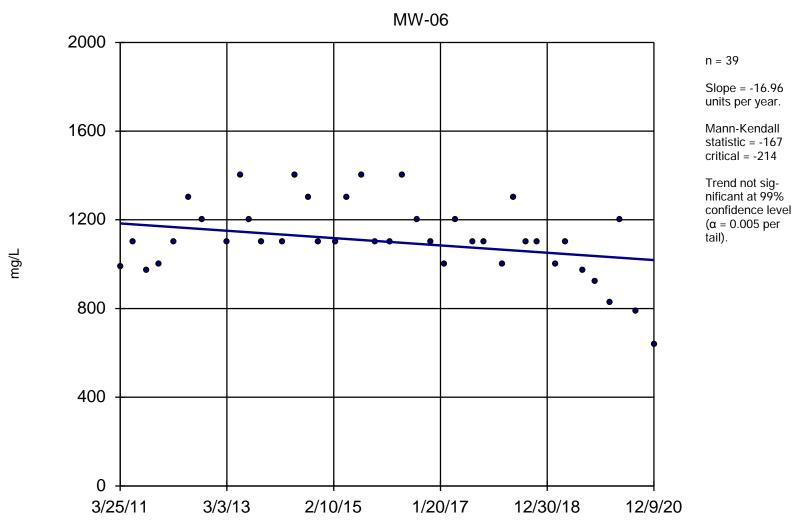


Constituent: Total Dissolved Solids Analysis Run 4/2/2021 11:47 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database

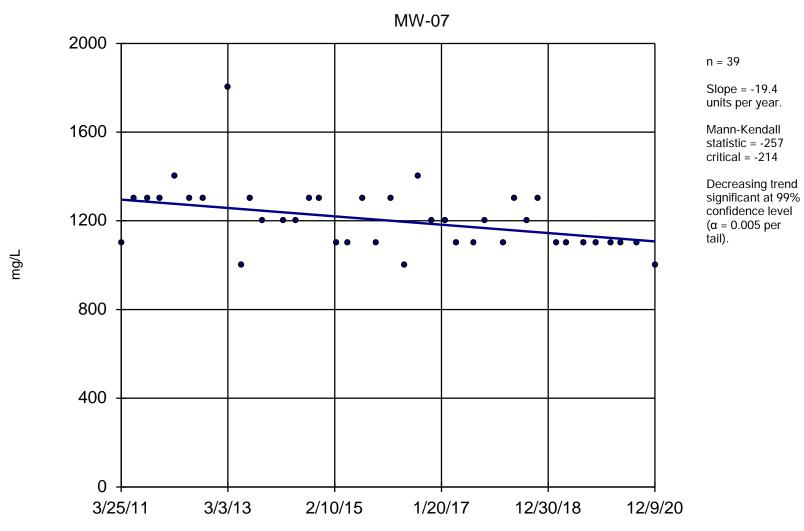


Constituent: Total Dissolved Solids Analysis Run 4/2/2021 11:47 AM

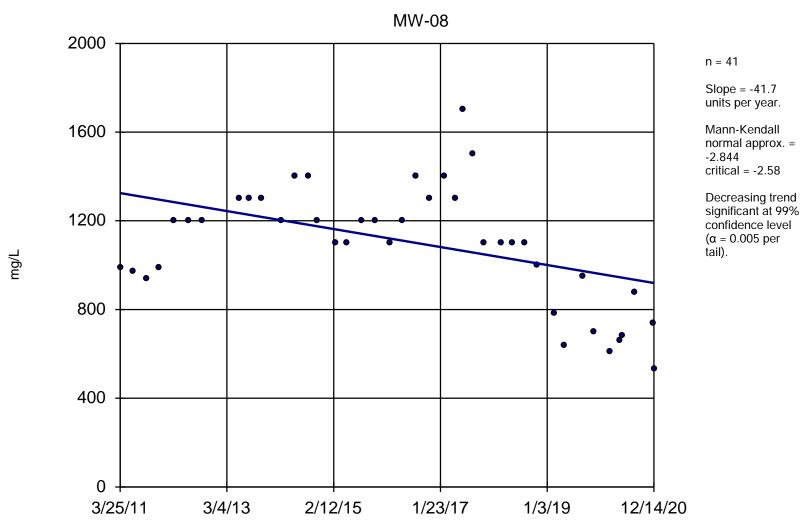


Constituent: Total Dissolved Solids Analysis Run 4/2/2021 11:47 AM

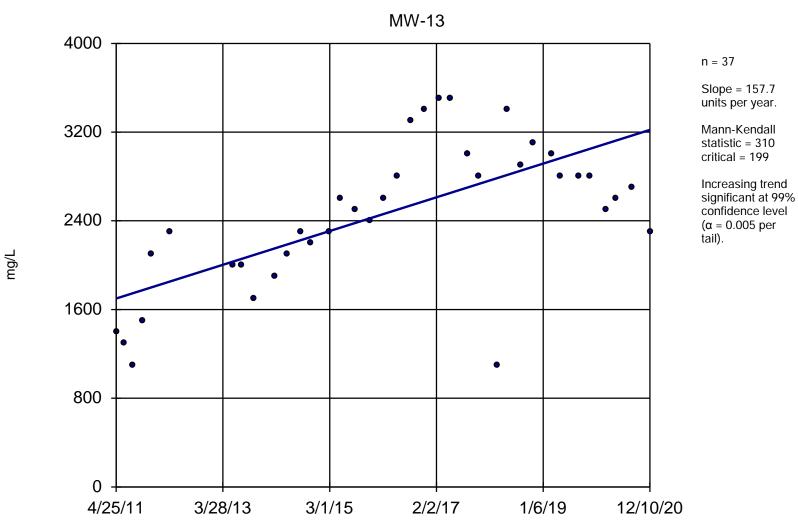
Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



Constituent: Total Dissolved Solids Analysis Run 4/2/2021 11:47 AM

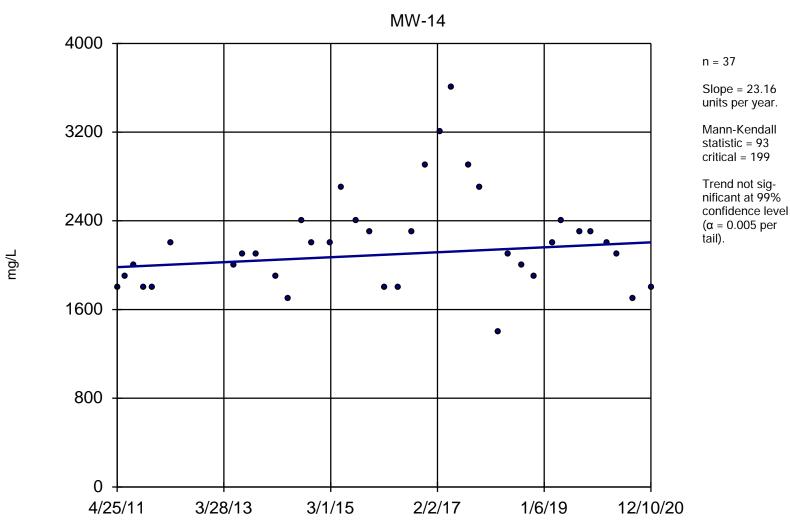


Constituent: Total Dissolved Solids Analysis Run 4/2/2021 11:47 AM



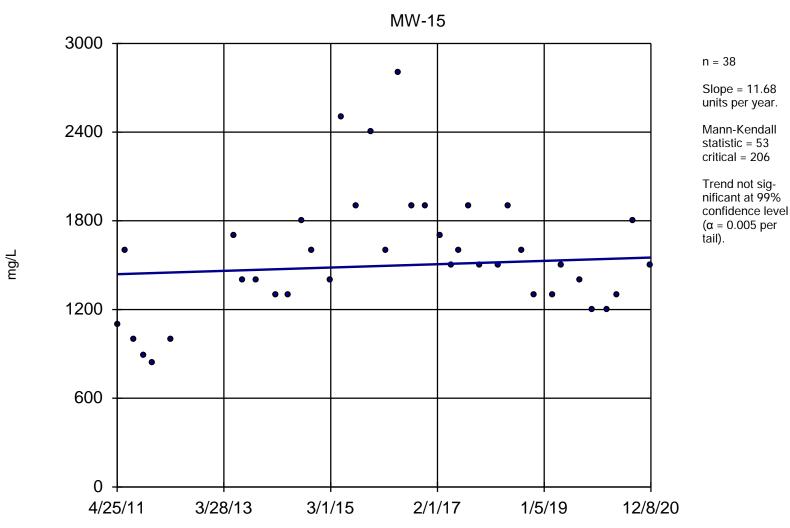
Constituent: Total Dissolved Solids Analysis Run 4/2/2021 11:47 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



Constituent: Total Dissolved Solids Analysis Run 4/2/2021 11:47 AM

Utility Site P Client: Weaver Consultants Group Data: Powerton Sanitas Database



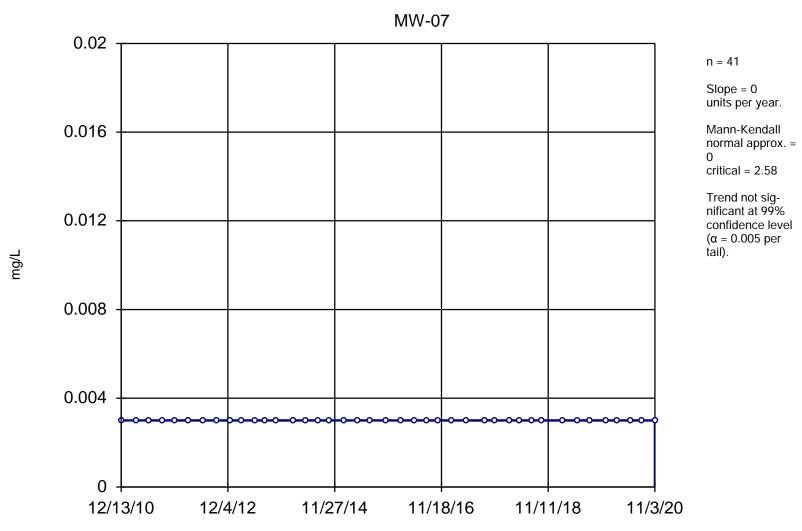
Constituent: Total Dissolved Solids Analysis Run 4/2/2021 11:47 AM

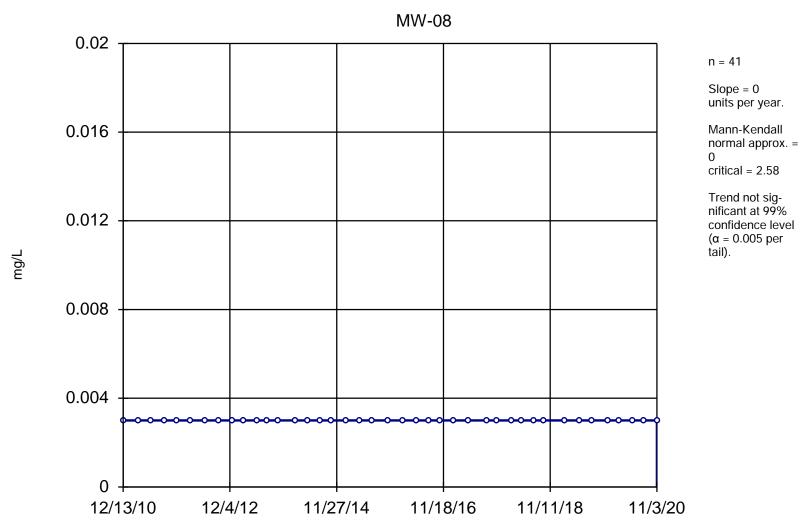
### **Trend Test**

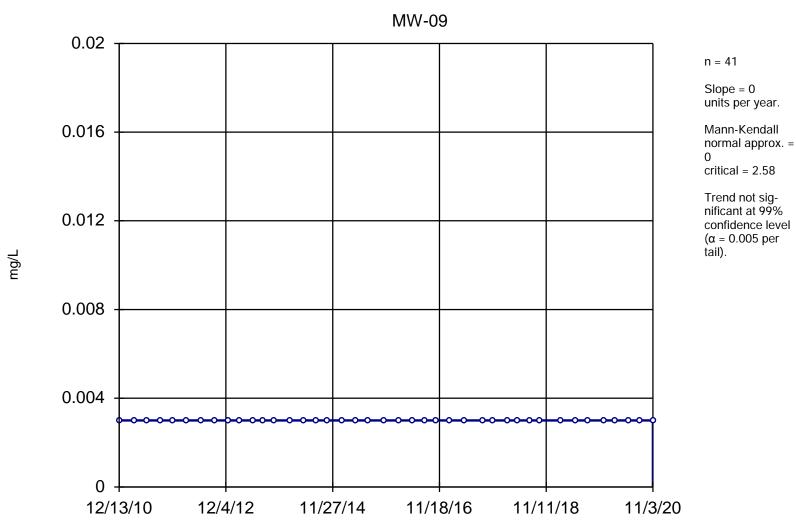
	Utility Site WC	Utility Site WC									
Constituent	<u>Well</u>	<u>Slope</u>	Calc.	Critical	Sig.	<u>N</u>	%NDs	<u>Normality</u>	<u>Xform</u>	<u>Alpha</u>	Method
Antimony, Dissolved (mg/L)	MW-07	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-08	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-09	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-10	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-09	0	0	30	No	10	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-10	0	0	30	No	10	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-11	0	0	30	No	10	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-12	0	0	30	No	10	100	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-07	-0.00019	-4.499	-2.58	Yes	41	4.878	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-08	-0.00	-2.654	-2.58	Yes	41	9.756	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-09	-0.00	-2.654	-2.58	Yes	41	0	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-10	0.000	1.461	2.58	No	41	2.439	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-09	-0.00	-7	-30	No	10	0	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-10	-0.00	-6	-30	No	10	0	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-11	0.00079	16	30	No	10	0	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-12	0.000	16	30	No	10	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-07	-0.00	-1.226	-2.58	No	41	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-08	-0.00	-2.136	-2.58	No	41	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-09	0.001298	4.034	2.58	Yes	41	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-10	-0.00	-2.049	-2.58	No	41	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-09	0.008982	29	30	No	10	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-10	0	4	30	No	10	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-11	0.01931	17	30	No	10	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-12	0.01043	10	30	No	10	0	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-07	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-08	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-09	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-10	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Beryllium, Total (mg/L)	MW-09	0	0	30	No	10	100	n/a	n/a	0.01	NP
Beryllium, Total (mg/L)	MW-10	0	0	30	No	10	100	n/a	n/a	0.01	NP
Beryllium, Total (mg/L)	MW-11	0	0	30	No	10	100	n/a	n/a	0.01	NP
Beryllium, Total (mg/L)	MW-12	0	0	30	No	10	100	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-07	-0.1286	-2.013	-2.58	No	41	2.439	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-08	0.08139	2.23	2.58	No	41	0	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-09	0	-0.43	-2.58	No	41	0	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-10	0.0763	2.026	2.58	No	41	0	n/a	n/a	0.01	NP
Boron, Total (mg/L)	MW-09	0	-7	-53	No	15	0	n/a	n/a	0.01	NP
Boron, Total (mg/L)	MW-10	-0.1947	-33	-53	No	15	0	n/a	n/a	0.01	NP
Boron, Total (mg/L)	MW-11	0	-6	-53	No	15	0	n/a	n/a	0.01	NP
Boron, Total (mg/L)	MW-12	-0.02005	-8	-53	No	15	0	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-07	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-08	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-09	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-10	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Cadmium, Total (mg/L)	MW-09	0	0	30	No	10	100	n/a	n/a	0.01	NP
Cadmium, Total (mg/L)	MW-10	0	0	30	No	10	100	n/a	n/a	0.01	NP
Cadmium, Total (mg/L)	MW-11	0	0	30	No	10	100	n/a	n/a	<sub>0.0</sub> ₩WG1	3-1 <b>§</b> [ <u>P</u> 81892
Cadmium Total (mg/l )	M\\/-12	n	Λ	30	No	10	100	n/a	n/a	<b>Λ Λ1</b>	NP

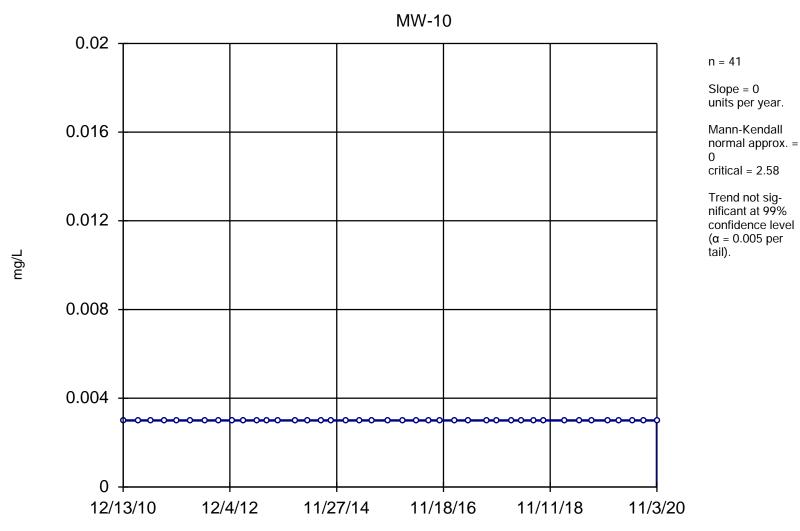
	Utility Site WC	Client: Weaver C	onsultants Gro	oup Data: Wi	ll County Sa	initas Data	abase Prin	ited 4/2/2021, 12	2:08 PM		
Constituent	<u>Well</u>	Slope	Calc.	Critical	Sig.	<u>N</u>	%NDs	Normality	<u>Xform</u>	<u>Alpha</u>	Method
Calcium, Total (mg/L)	MW-11	-3.571	-40	-53	No	15	0	n/a	n/a	0.01	NP
Calcium, Total (mg/L)	MW-12	2.832	14	53	No	15	0	n/a	n/a	0.01	NP
Chloride (mg/L)	MW-07	-3.132	-2.259	-2.58	No	41	0	n/a	n/a	0.01	NP
Chloride (mg/L)	MW-08	-5.326	-2.43	-2.58	No	41	0	n/a	n/a	0.01	NP
Chloride (mg/L)	MW-09	10.04	2.639	2.58	Yes	44	0	n/a	n/a	0.01	NP
Chloride (mg/L)	MW-10	0	1.113	2.58	No	42	0	n/a	n/a	0.01	NP
Chloride (mg/L)	MW-11	6.703	43	53	No	15	0	n/a	n/a	0.01	NP
Chloride (mg/L)	MW-12	-3.321	-8	-53	No	15	0	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-07	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-08	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-09	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Chromium, Dissolved (mg/L)	MW-10	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Chromium, Total (mg/L)	MW-09	0	0	30	No	10	100	n/a	n/a	0.01	NP
Chromium, Total (mg/L)	MW-10	0	0	30	No	10	100	n/a	n/a	0.01	NP
Chromium, Total (mg/L)	MW-11	0	0	30	No	10	100	n/a	n/a	0.01	NP
Chromium, Total (mg/L)	MW-12	0	-1	-30	No	10	90	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-07	0	0.6339	2.58	No	41	97.56	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-08	0	2.939	2.58	Yes	41	82.93	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-09	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Cobalt, Dissolved (mg/L)	MW-10	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Cobalt, Total (mg/L)	MW-09	0	0	30	No	10	100	n/a	n/a	0.01	NP
Cobalt, Total (mg/L)	MW-10	0	0	30	No	10	100	n/a	n/a	0.01	NP
Cobalt, Total (mg/L)	MW-11	0	0	30	No	10	100	n/a	n/a	0.01	NP
Cobalt, Total (mg/L)	MW-12	0	0	30	No	10	100	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-07	-0.02826	-3.542	-2.58	Yes	41	2.439	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-08	-0.00	-0.8104	-2.58	No	41	0	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-09	0.01394	2.167	2.58	No	44	0	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-10	0.02406	3.998	2.58	Yes	42	0	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-11	-0.01639	-19	-53	No	15	0	n/a	n/a	0.01	NP
Fluoride (mg/L)	MW-12	-0.02033	-32	-53	No	15	0	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-07	0	0.7184	2.58	No	41	97.56	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-08	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-09	0	0.7184	2.58	No	41	97.56	n/a	n/a	0.01	NP
Lead, Dissolved (mg/L)	MW-10	0	0	2.58	No	41	97.56	n/a	n/a	0.01	NP
Lead, Total (mg/L)	MW-09	0	-8	-30	No	10	60	n/a	n/a	0.01	NP
Lead, Total (mg/L)	MW-10	0	-3	-30	No	10	80	n/a	n/a	0.01	NP
Lead, Total (mg/L)	MW-11	0	-11	-30	No	10	80	n/a	n/a	0.01	NP
Lead, Total (mg/L)	MW-12	0	-6	-30	No	10	70	n/a	n/a	0.01	NP
Lithium, Total (mg/L)	MW-09	0	9	30	No	10	90	n/a	n/a	0.01	NP
Lithium, Total (mg/L)	MW-10	-0.00	-9	-30	No	10	0	n/a	n/a	0.01	NP
Lithium, Total (mg/L)	MW-11	0	-7	-30	No	10	90	n/a	n/a	0.01	NP
Lithium, Total (mg/L)	MW-12	-0.00	-7	-30	No	10	10	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-07	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-08	0	1.564	2.58	No	41	97.56	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-09	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Mercury, Dissolved (mg/L)	MW-10	0	0.1268	2.58	No	41	97.56	n/a	n/a	0.01	NP
Mercury, Total (mg/L)	MW-09	0	0.1200	30	No	10	100	n/a	n/a	<sub>0.0</sub> MWG13	
Mercury, Total (mg/L)	M\\\/-10	0	7	30	No	10	an	n/a	n/a	0.01	NP

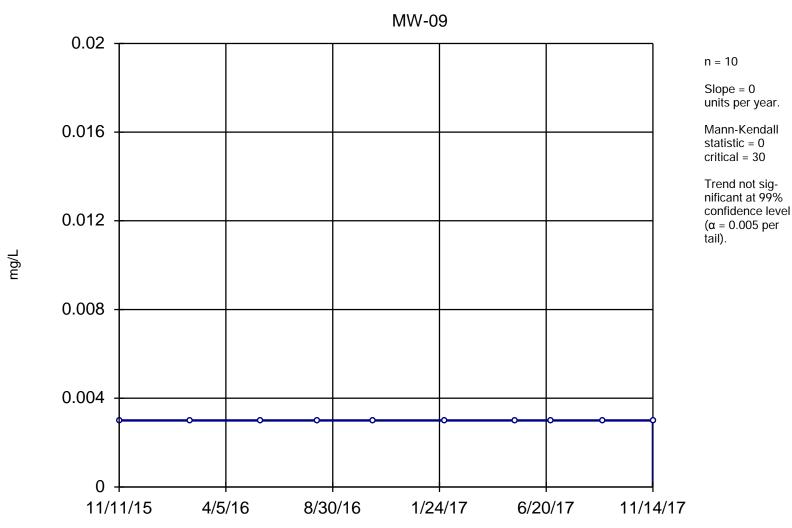
	Utility Site WC	Client: Weaver Co	onsultants Grou	p Data: Will	County Sa	nitas Datab	ase Prin	ted 4/2/2021, 12	:08 PM		
Constituent	Well	Slope	Calc.	Critical	Sig.	<u>N</u>	%NDs	Normality	<u>Xform</u>	<u>Alpha</u>	Method
Molybdenum, Total (mg/L)	MW-09	-0.03011	-10	-30	No	10	0	n/a	n/a	0.01	NP
Molybdenum, Total (mg/L)	MW-10	0.004063	9	30	No	10	0	n/a	n/a	0.01	NP
Molybdenum, Total (mg/L)	MW-11	-0.00	-7	-30	No	10	0	n/a	n/a	0.01	NP
Molybdenum, Total (mg/L)	MW-12	0.000	2	30	No	10	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-07	-0.0954	-3.18	-2.58	Yes	41	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-08	-0.06169	-4.36	-2.58	Yes	41	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-09	-0.2753	-6.593	-2.58	Yes	41	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-10	-0.03769	-2.765	-2.58	Yes	41	0	n/a	n/a	0.01	NP
Radium 226 + Radium 228, Combin	MW-09	0	5	30	No	10	40	n/a	n/a	0.01	NP
Radium 226 + Radium 228, Combin	MW-10	-0.01989	-1	-30	No	10	10	n/a	n/a	0.01	NP
Radium 226 + Radium 228, Combin	MW-11	0.01931	1	30	No	10	0	n/a	n/a	0.01	NP
Radium 226 + Radium 228, Combin	MW-12	0	5	30	No	10	50	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-07	0.000	3.258	2.58	Yes	41	48.78	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-08	0	1.563	2.58	No	41	58.54	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-09	-0.00	-4.197	-2.58	Yes	41	56.1	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-10	0	0	2.58	No	41	85.37	n/a	n/a	0.01	NP
Selenium, Total (mg/L)	MW-09	0	9	30	No	10	90	n/a	n/a	0.01	NP
Selenium, Total (mg/L)	MW-10	0	0	30	No	10	100	n/a	n/a	0.01	NP
Selenium, Total (mg/L)	MW-11	0	0	30	No	10	100	n/a	n/a	0.01	NP
Selenium, Total (mg/L)	MW-12	0	9	30	No	10	50	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-07	-4.734	-0.4842	-2.58	No	41	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-08	9.21	0.9221	2.58	No	41	2.439	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-09	-19.97	-5.128	-2.58	Yes	44	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-10	-12.33	-4.428	-2.58	Yes	42	2.381	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-11	-19.01	-68	-53	Yes	15	0	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-12	-23.7	-50	-53	No	15	0	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-07	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-08	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-09	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-10	0	0	2.58	No	41	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-09	0	0	30	No	10	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-10	0	0	30	No	10	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-11	0	0	30	No	10	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-12	0	0	30	No	10	100	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-07	0	-0.05693	-2.58	No	41	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-08	14.23	1.157	2.58	No	41	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-09	-2.653	-0.537	-2.58	No	44	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-10	-12.03	-3.225	-2.58	Yes	42	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-11	0	2	53	No	15	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-12	14.48	12	53	No	15	0	n/a	n/a	0.01	NP



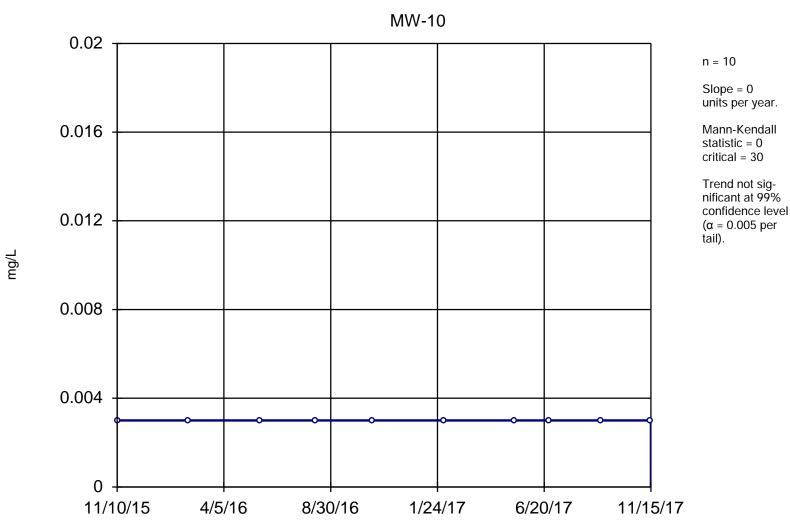




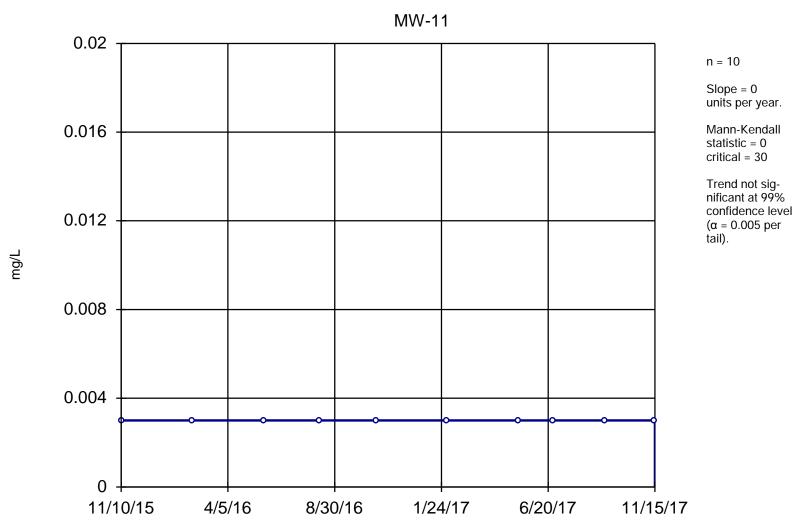




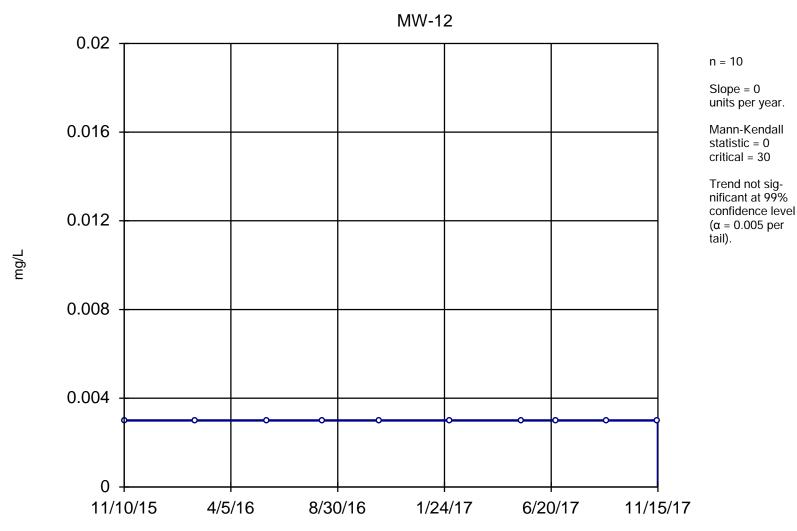
Constituent: Antimony, Total Analysis Run 4/2/2021 12:05 PM



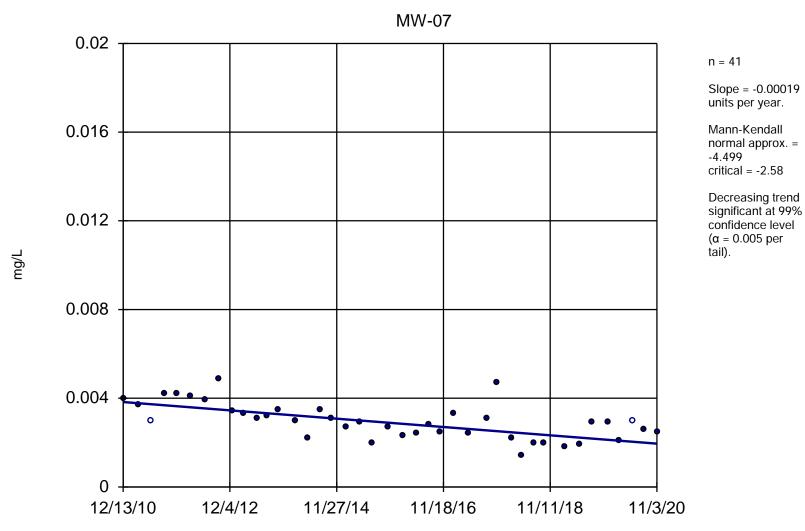
Constituent: Antimony, Total Analysis Run 4/2/2021 12:05 PM



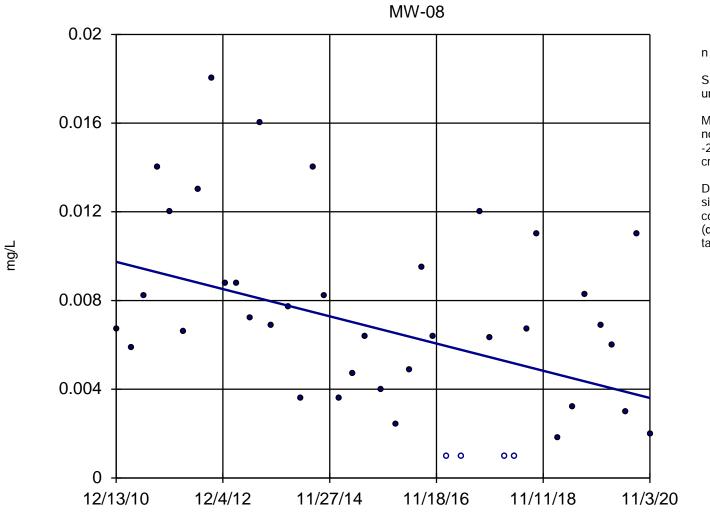
Constituent: Antimony, Total Analysis Run 4/2/2021 12:05 PM



Constituent: Antimony, Total Analysis Run 4/2/2021 12:05 PM



Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 12:05 PM



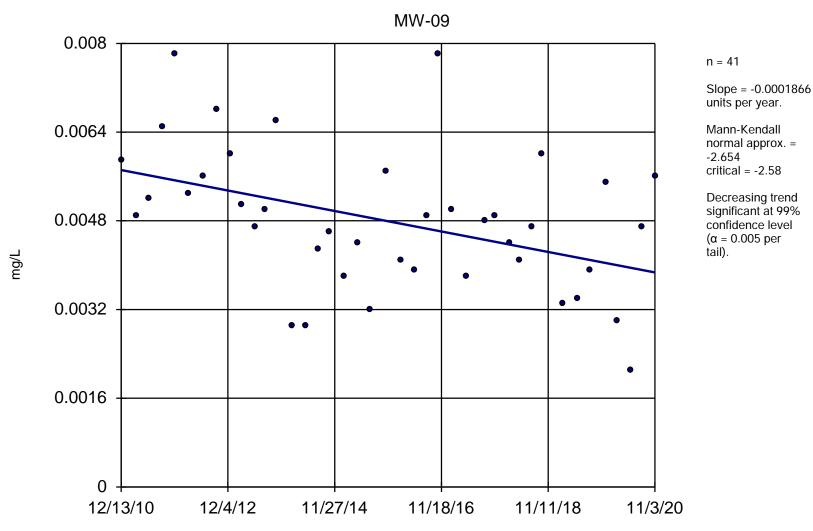
n = 41

Slope = -0.0006209 units per year.

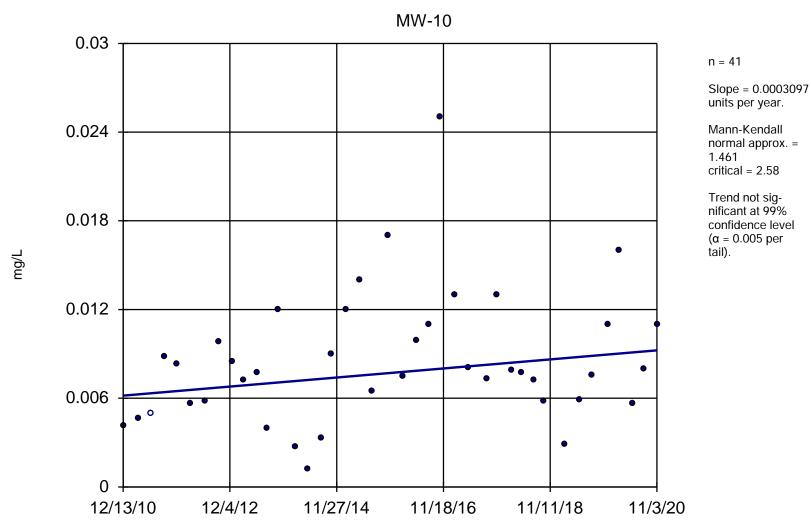
Mann-Kendall normal approx. = -2.654 critical = -2.58

Decreasing trend significant at 99% confidence level ( $\alpha = 0.005$  per tail).

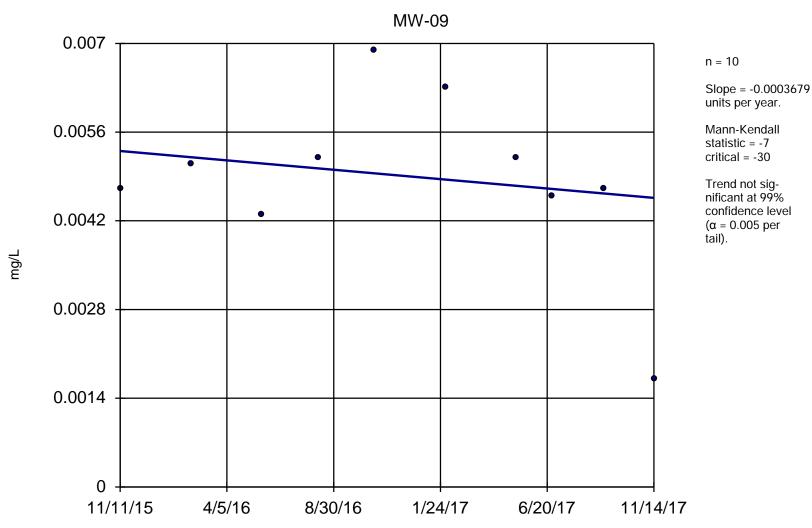
Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 12:05 PM



Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 12:05 PM



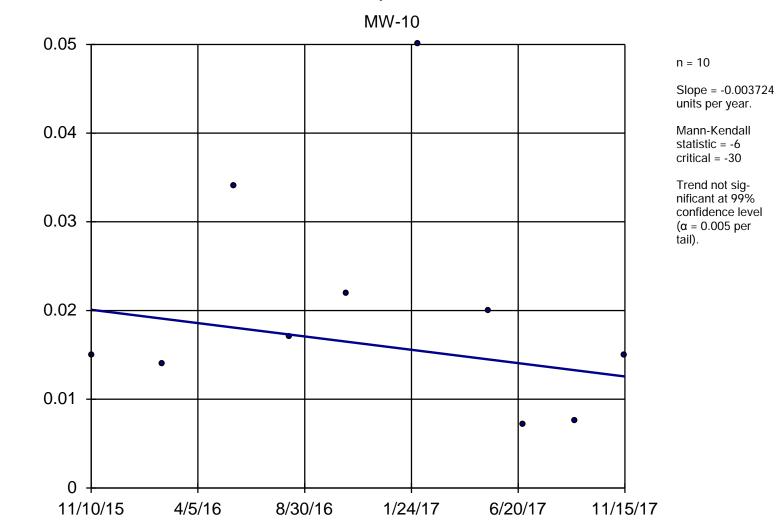
Constituent: Arsenic, Dissolved Analysis Run 4/2/2021 12:05 PM



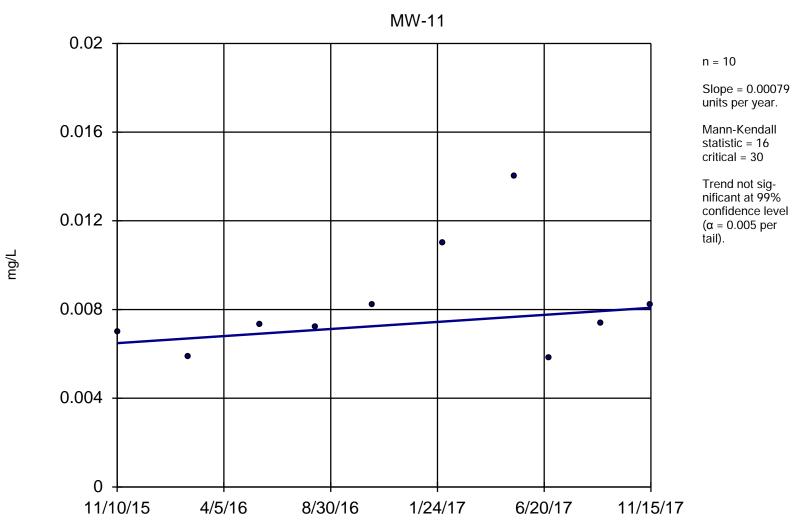
Constituent: Arsenic, Total Analysis Run 4/2/2021 12:05 PM

mg/L

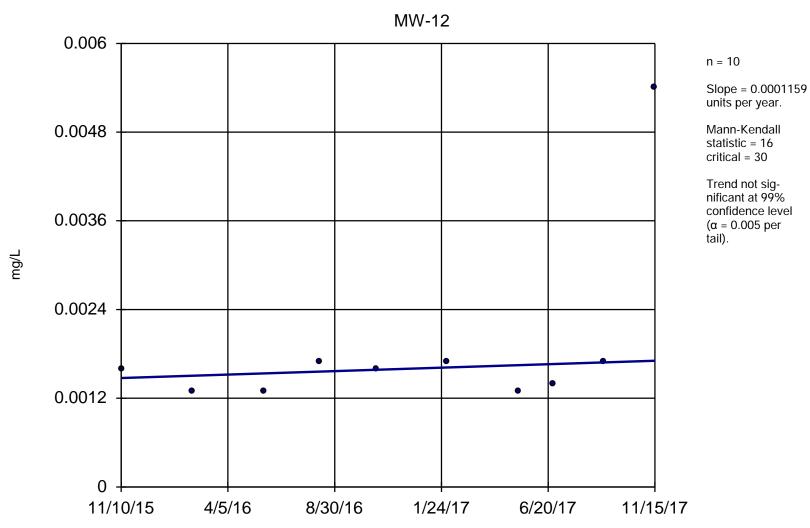
### Sen's Slope Estimator



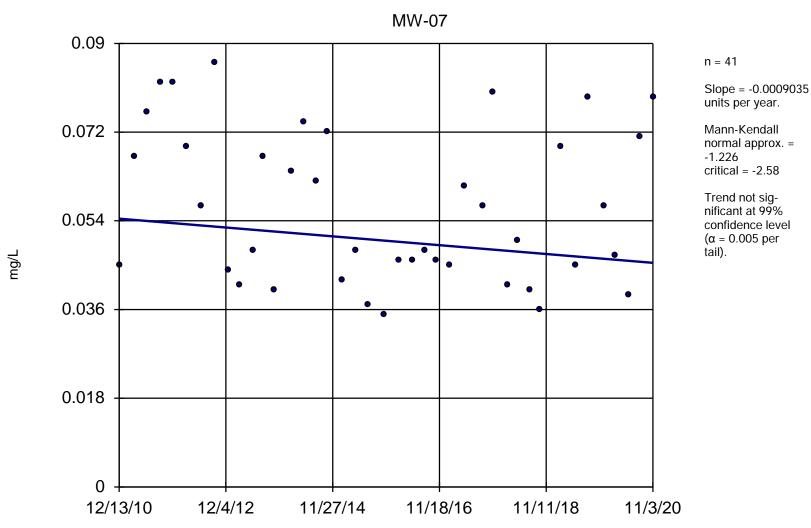
Constituent: Arsenic, Total Analysis Run 4/2/2021 12:05 PM



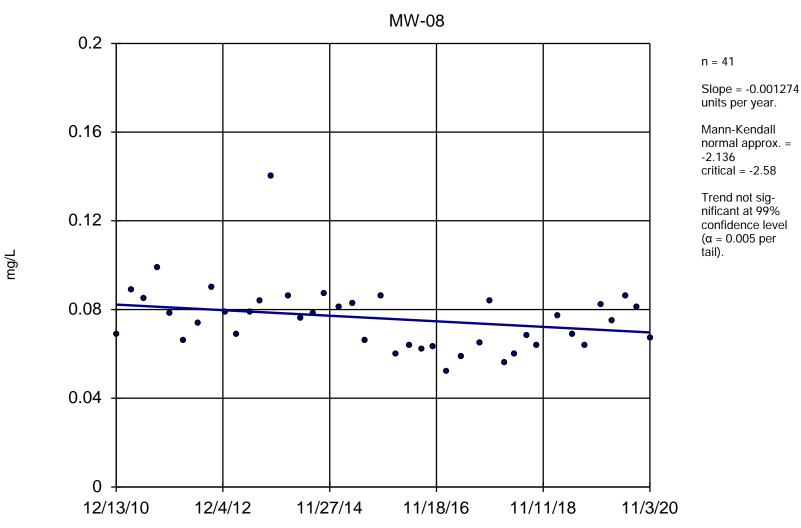
Constituent: Arsenic, Total Analysis Run 4/2/2021 12:05 PM



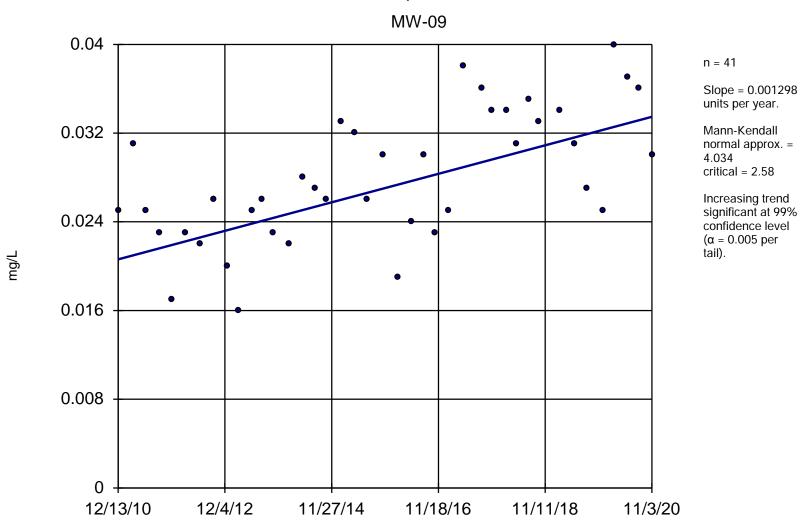
Constituent: Arsenic, Total Analysis Run 4/2/2021 12:05 PM



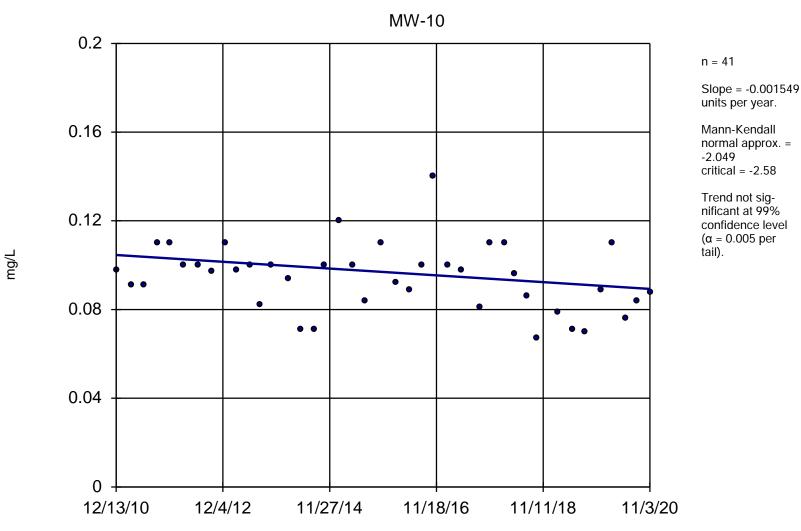
Constituent: Barium, Dissolved Analysis Run 4/2/2021 12:05 PM



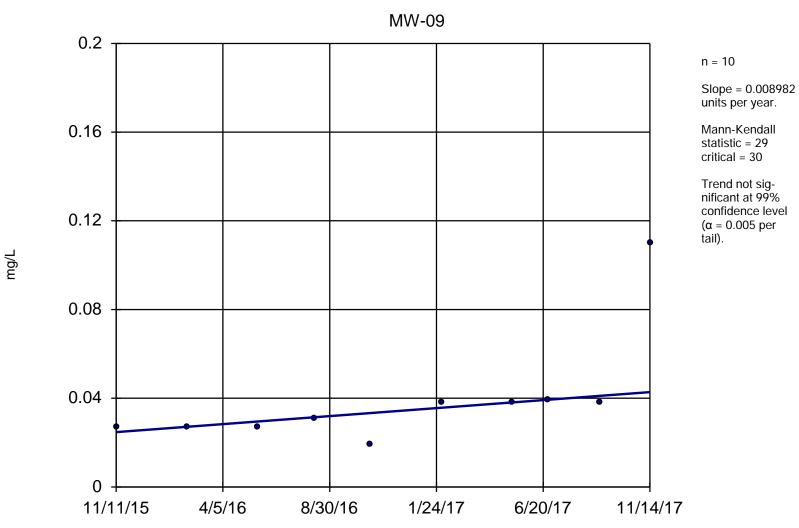
Constituent: Barium, Dissolved Analysis Run 4/2/2021 12:05 PM



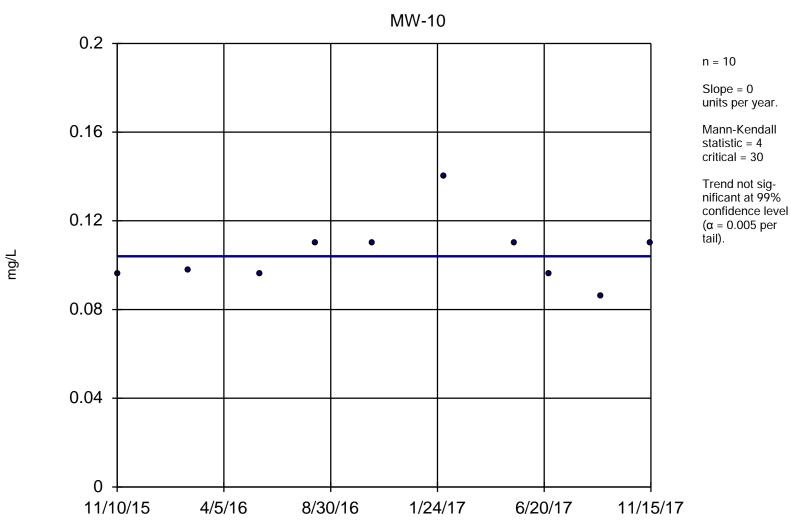
Constituent: Barium, Dissolved Analysis Run 4/2/2021 12:05 PM



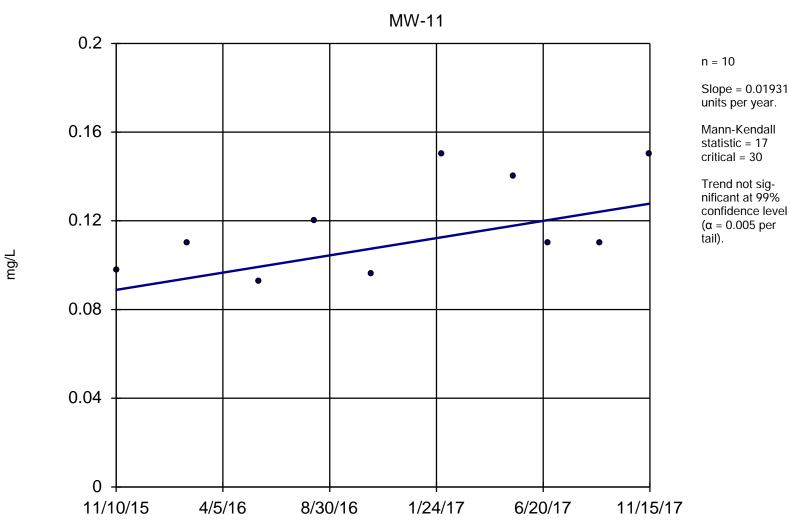
Constituent: Barium, Dissolved Analysis Run 4/2/2021 12:05 PM



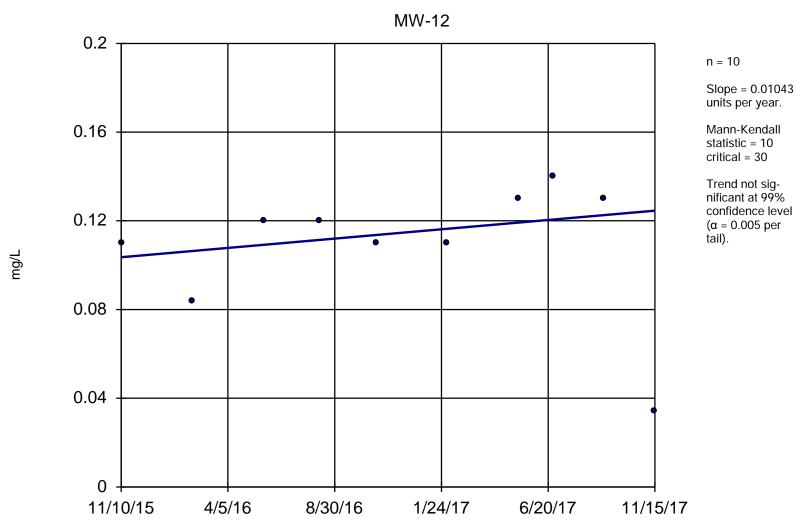
Constituent: Barium, Total Analysis Run 4/2/2021 12:05 PM



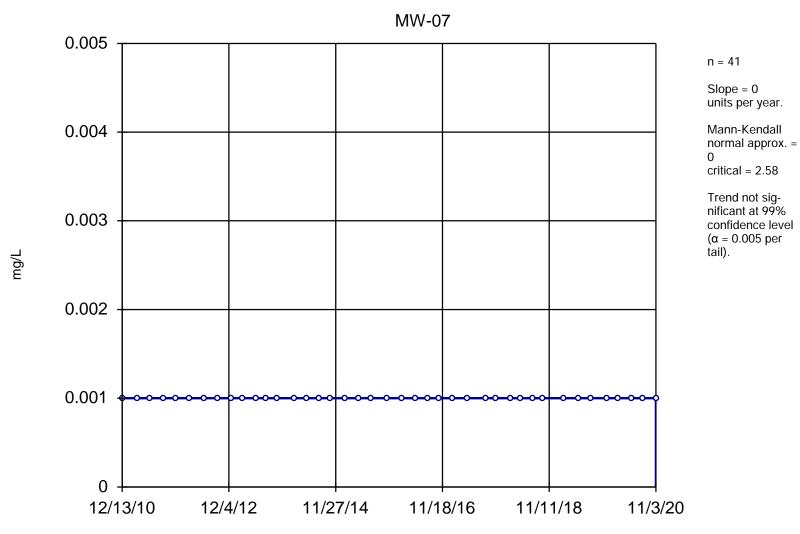
Constituent: Barium, Total Analysis Run 4/2/2021 12:05 PM

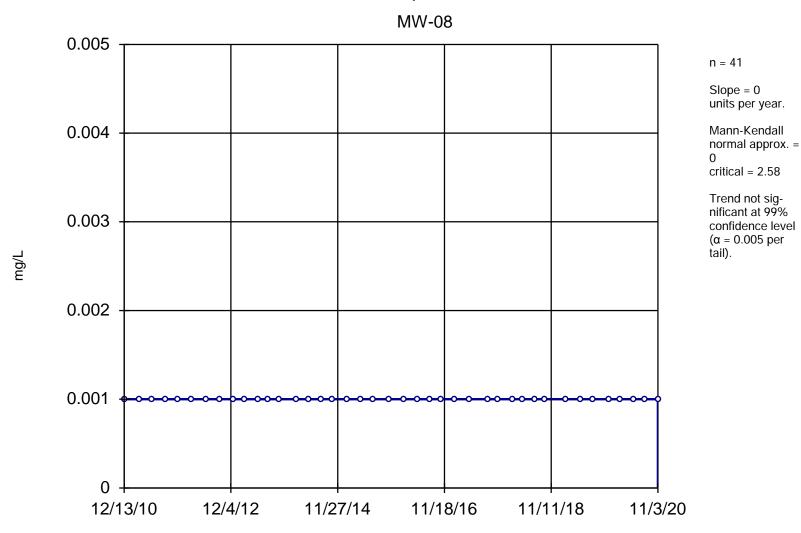


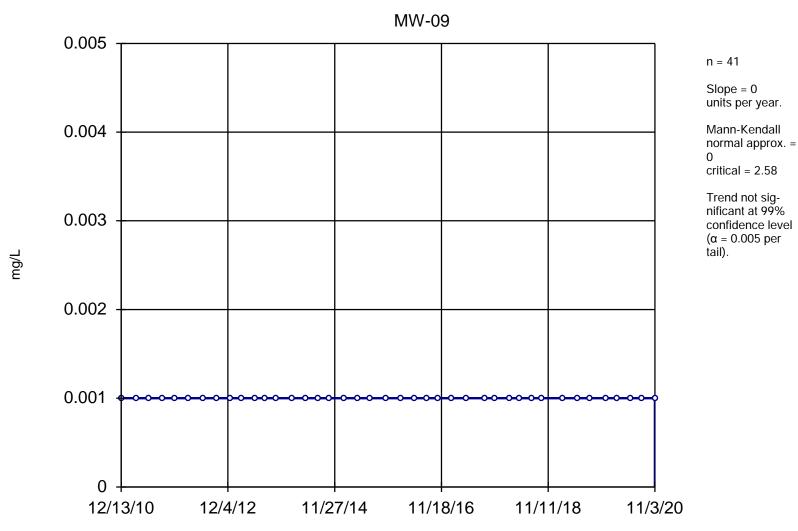
Constituent: Barium, Total Analysis Run 4/2/2021 12:05 PM

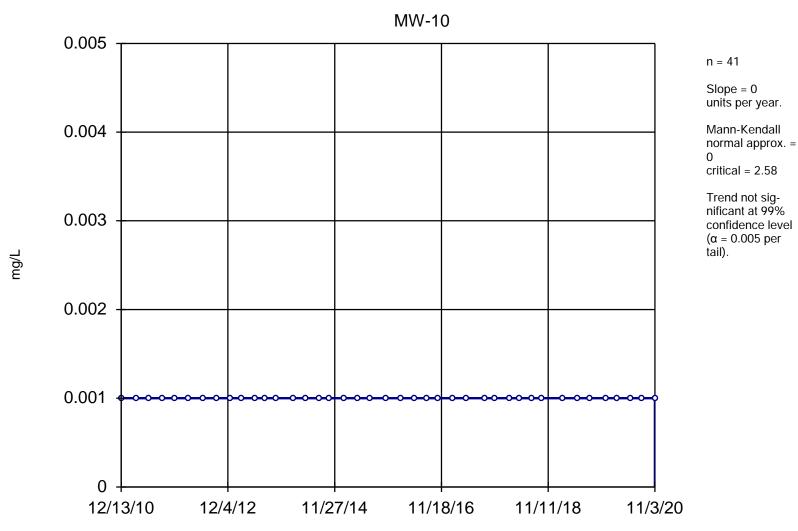


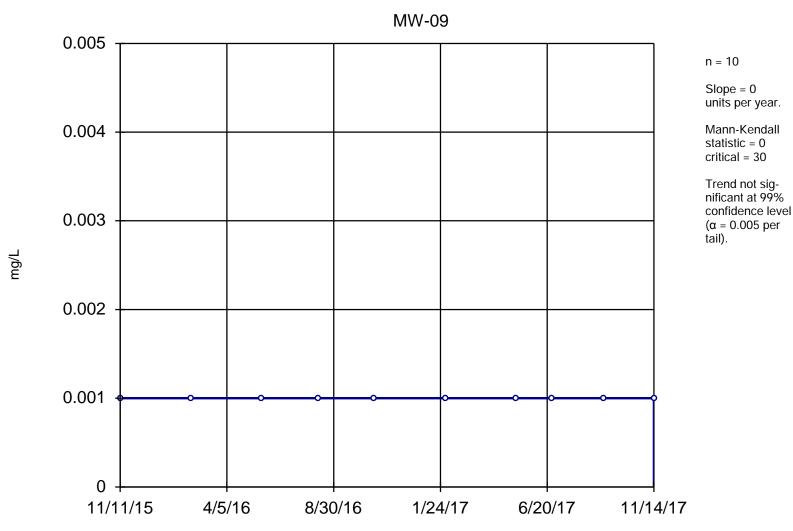
Constituent: Barium, Total Analysis Run 4/2/2021 12:05 PM



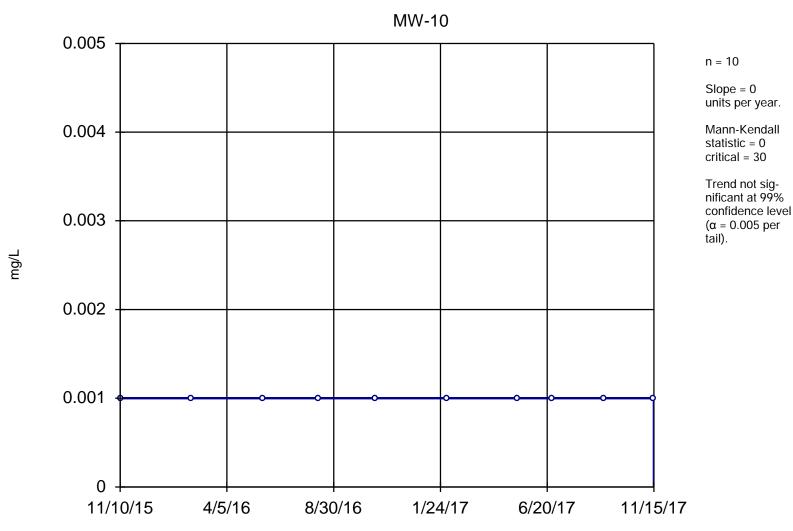




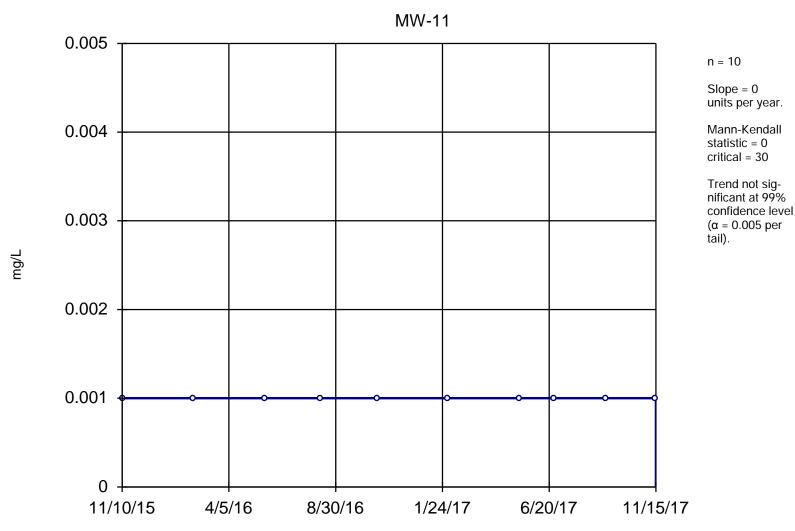




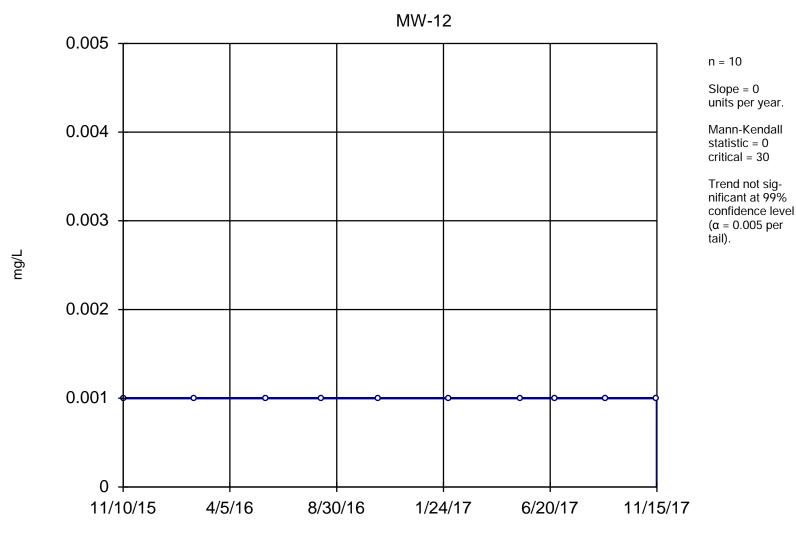
Constituent: Beryllium, Total Analysis Run 4/2/2021 12:05 PM



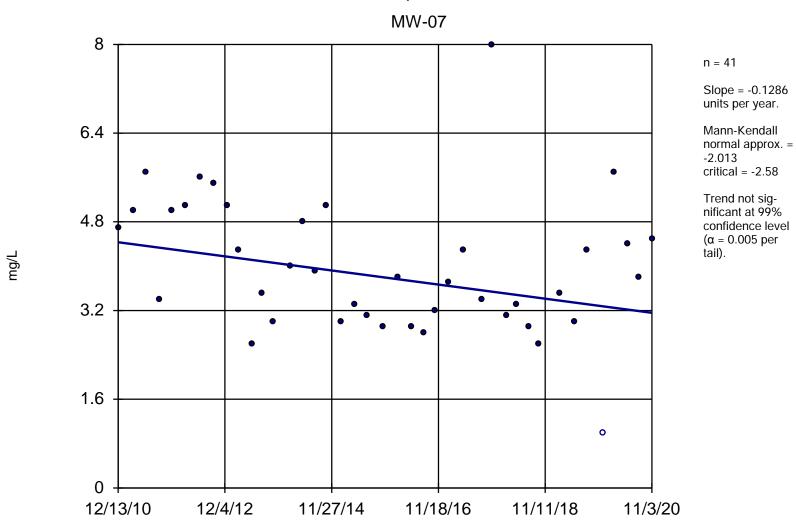
Constituent: Beryllium, Total Analysis Run 4/2/2021 12:05 PM



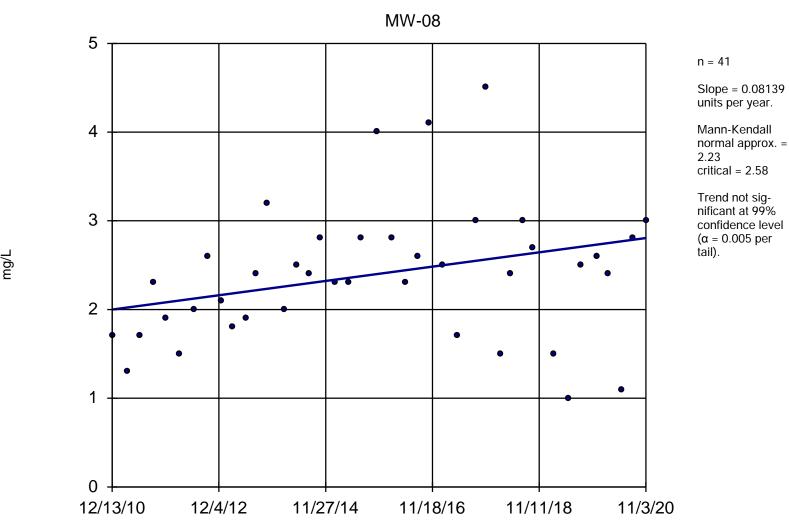
Constituent: Beryllium, Total Analysis Run 4/2/2021 12:05 PM



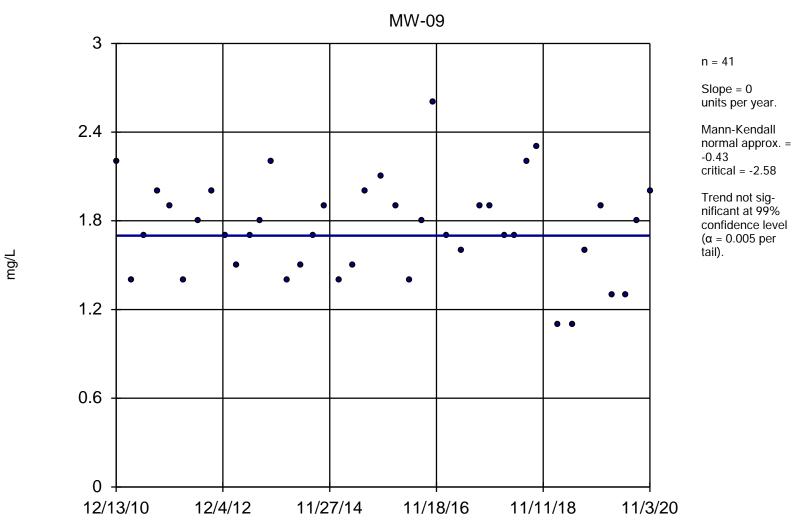
Constituent: Beryllium, Total Analysis Run 4/2/2021 12:06 PM



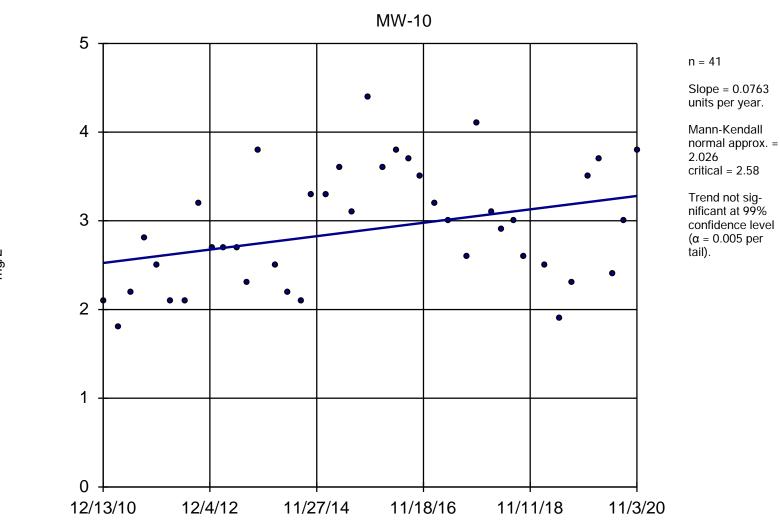
Constituent: Boron, Dissolved Analysis Run 4/2/2021 12:06 PM



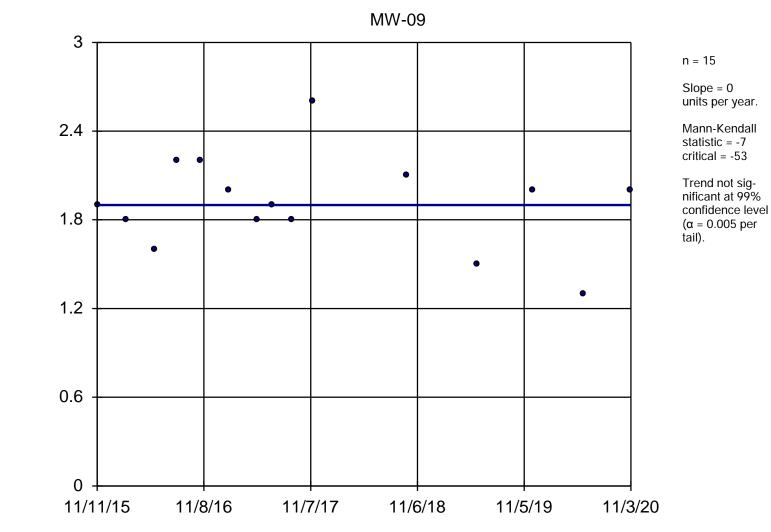
Constituent: Boron, Dissolved Analysis Run 4/2/2021 12:06 PM



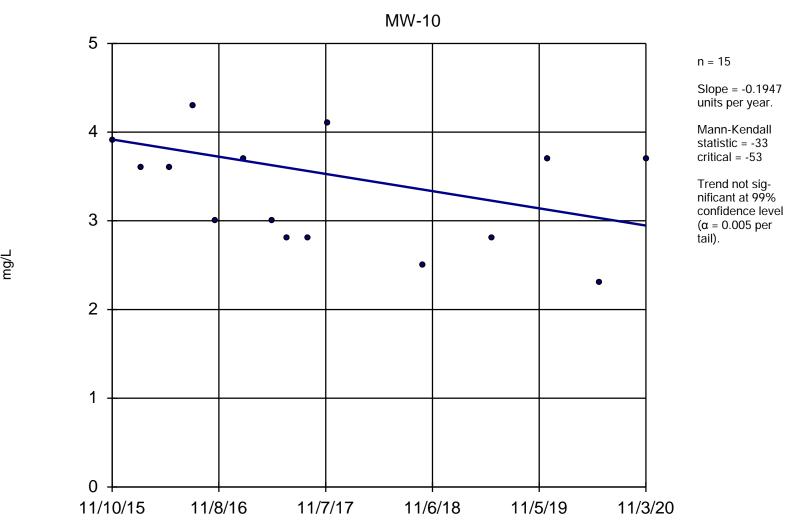
Constituent: Boron, Dissolved Analysis Run 4/2/2021 12:06 PM



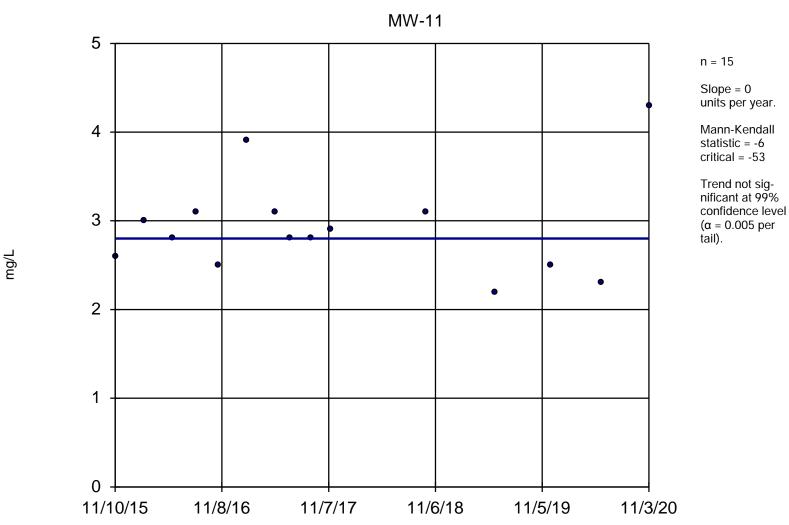
Constituent: Boron, Dissolved Analysis Run 4/2/2021 12:06 PM



Constituent: Boron, Total Analysis Run 4/2/2021 12:06 PM



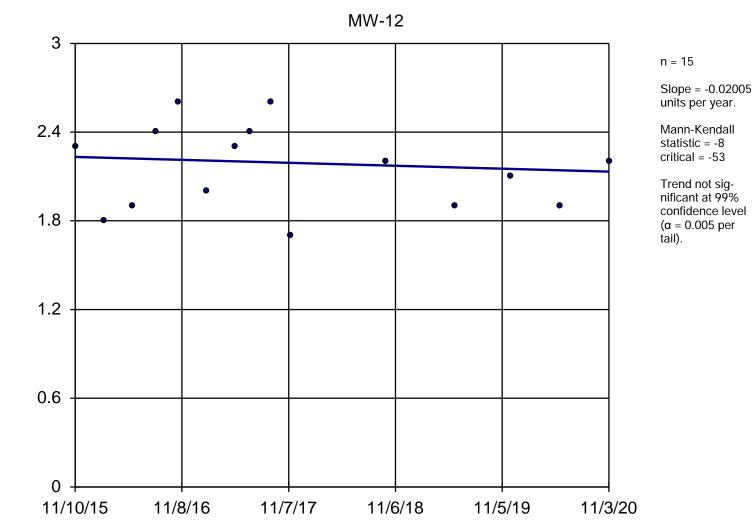
Constituent: Boron, Total Analysis Run 4/2/2021 12:06 PM



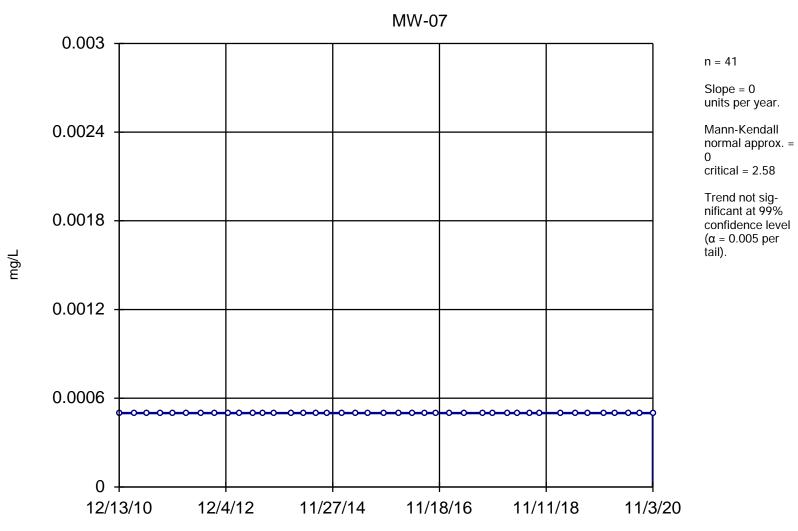
Constituent: Boron, Total Analysis Run 4/2/2021 12:06 PM

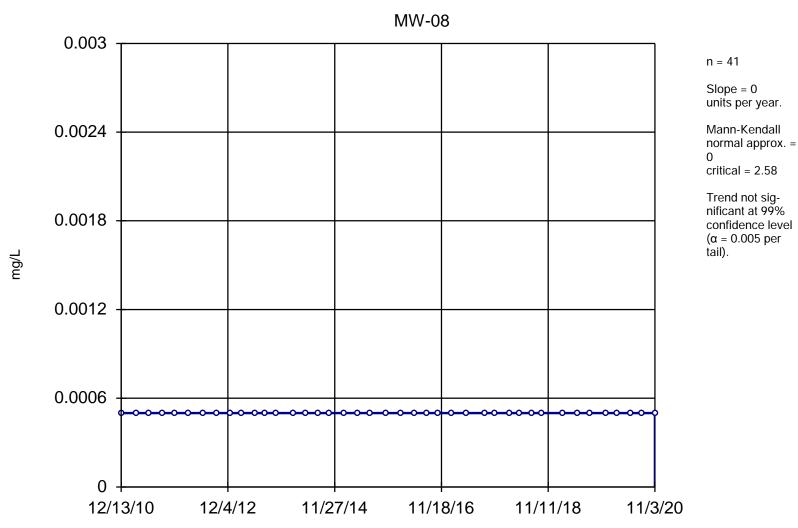
mg/L

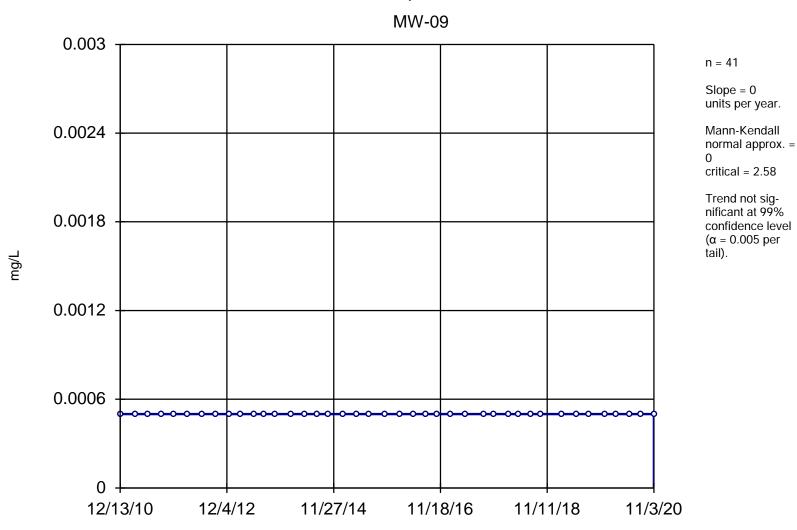
### Sen's Slope Estimator

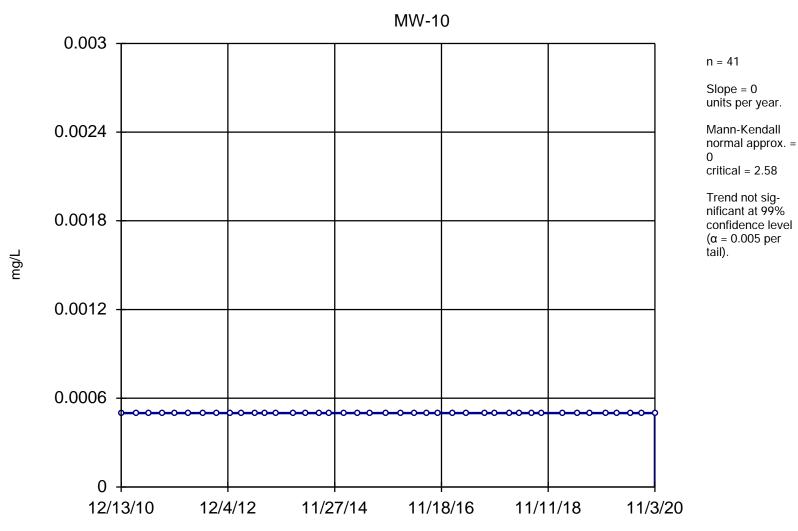


Constituent: Boron, Total Analysis Run 4/2/2021 12:06 PM

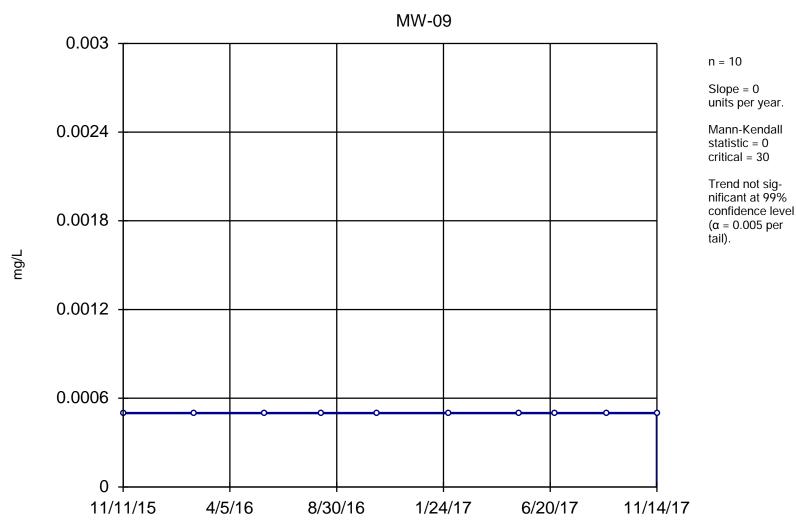




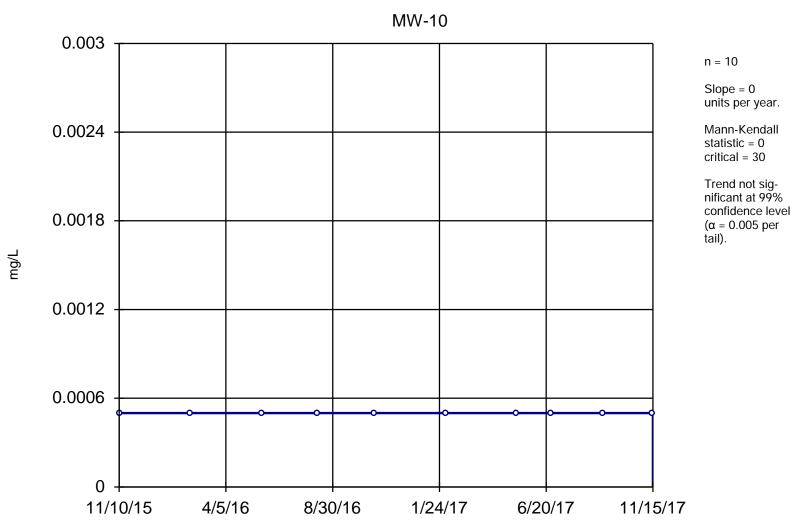




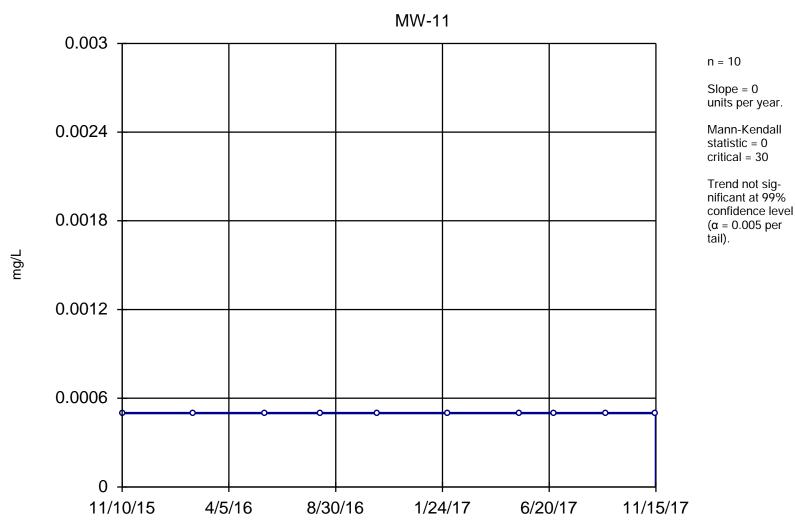
Constituent: Cadmium, Dissolved Analysis Run 4/2/2021 12:06 PM



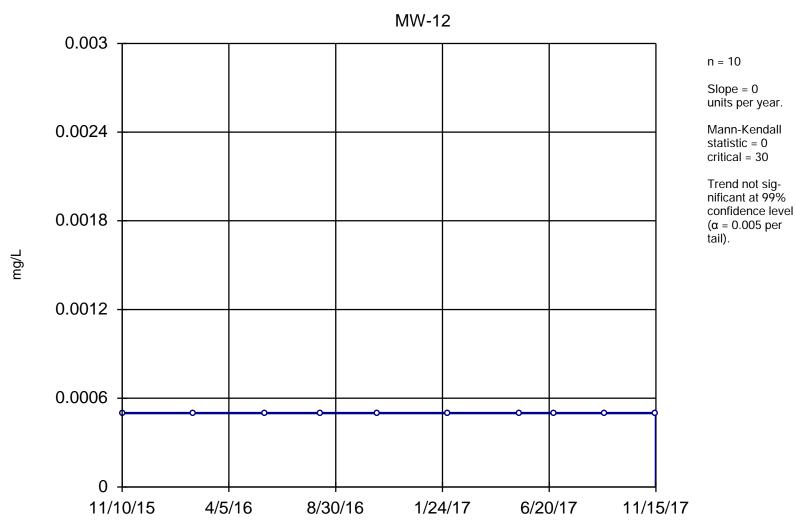
Constituent: Cadmium, Total Analysis Run 4/2/2021 12:06 PM



Constituent: Cadmium, Total Analysis Run 4/2/2021 12:06 PM



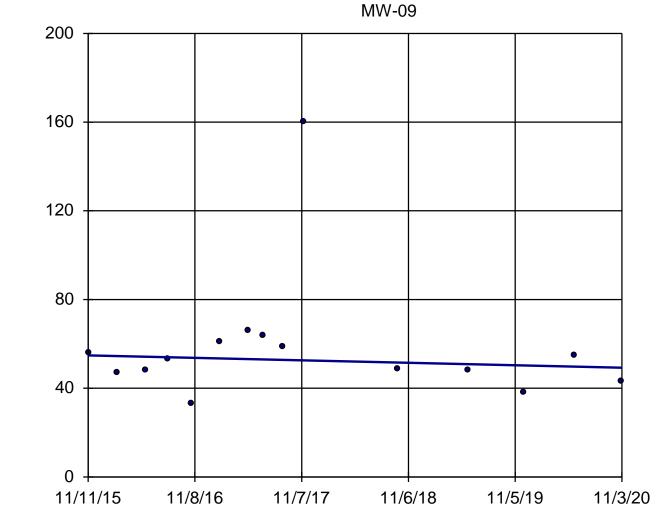
Constituent: Cadmium, Total Analysis Run 4/2/2021 12:06 PM



Constituent: Cadmium, Total Analysis Run 4/2/2021 12:06 PM

mg/L

### Sen's Slope Estimator



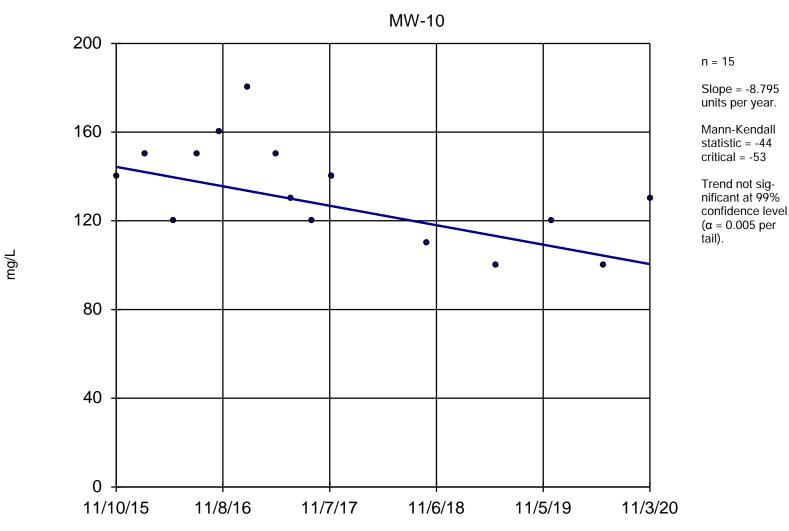
n = 15

Slope = -1.124 units per year.

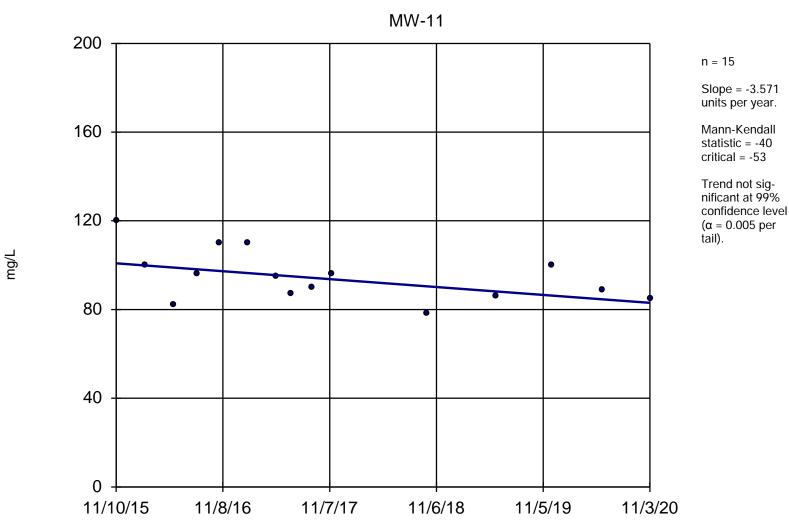
Mann-Kendall statistic = -6 critical = -53

Trend not significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

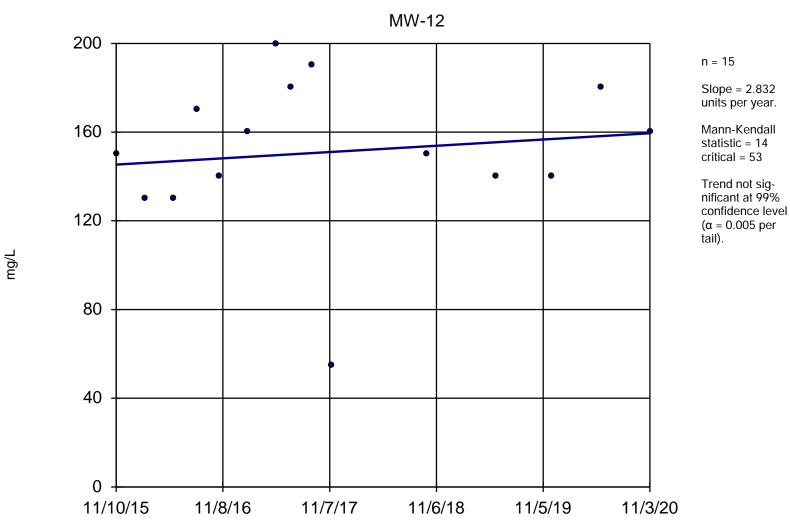
Constituent: Calcium, Total Analysis Run 4/2/2021 12:06 PM



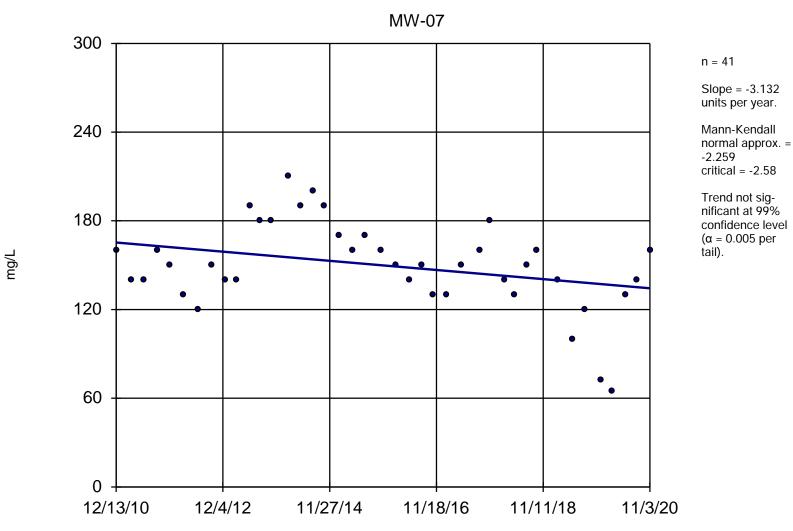
Constituent: Calcium, Total Analysis Run 4/2/2021 12:06 PM



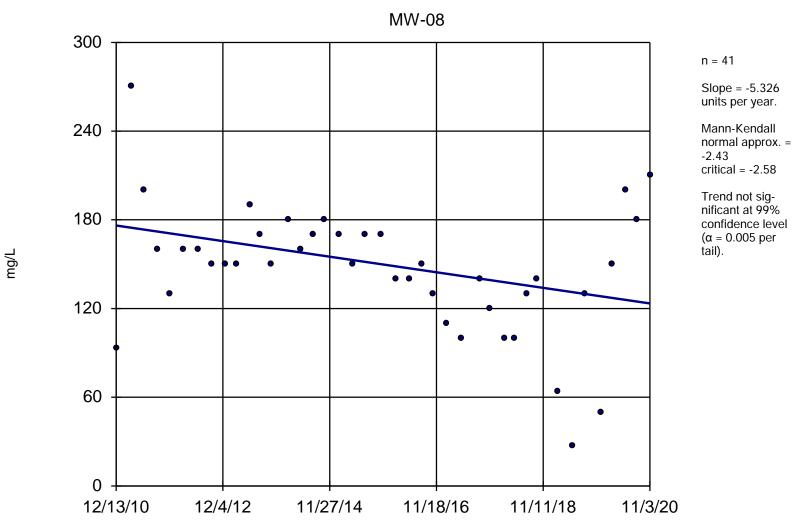
Constituent: Calcium, Total Analysis Run 4/2/2021 12:06 PM



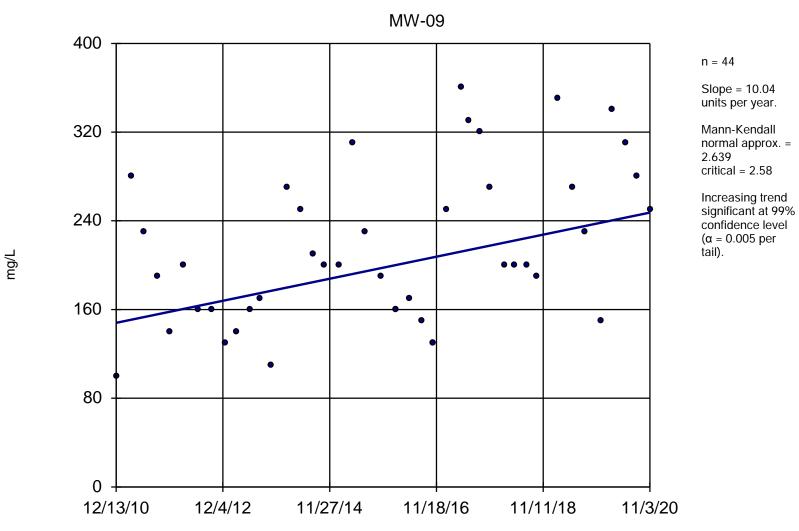
Constituent: Calcium, Total Analysis Run 4/2/2021 12:06 PM



Constituent: Chloride Analysis Run 4/2/2021 12:06 PM



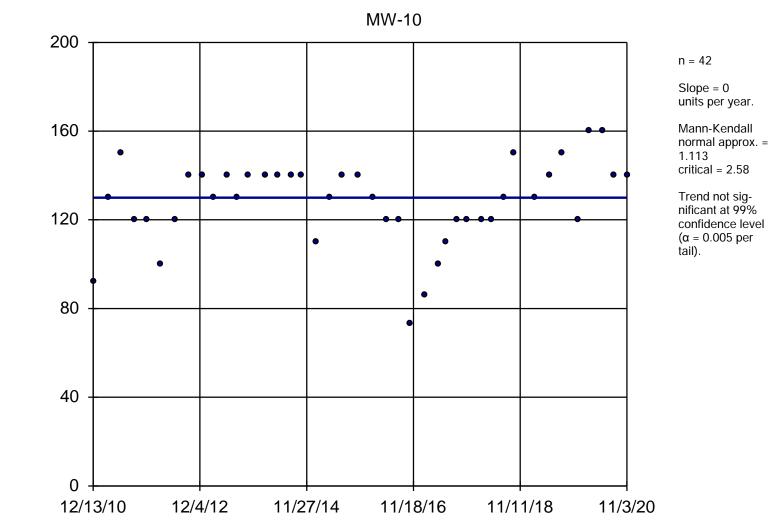
Constituent: Chloride Analysis Run 4/2/2021 12:06 PM



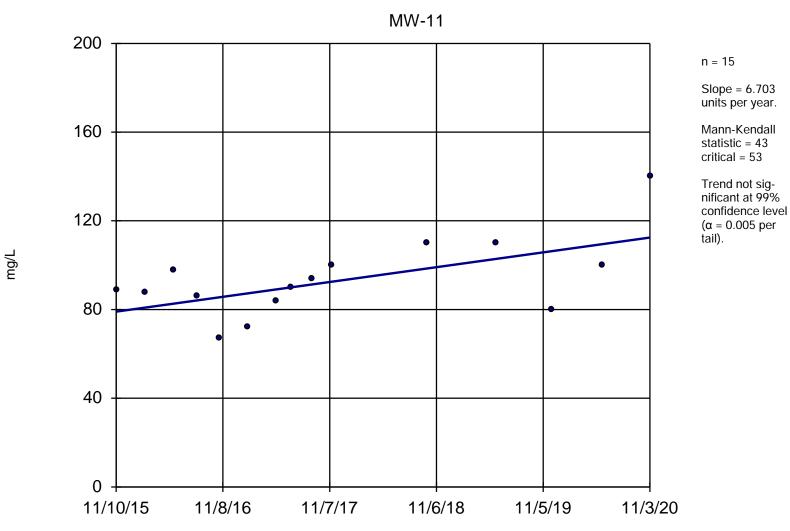
Constituent: Chloride Analysis Run 4/2/2021 12:06 PM

mg/L

### Sen's Slope Estimator



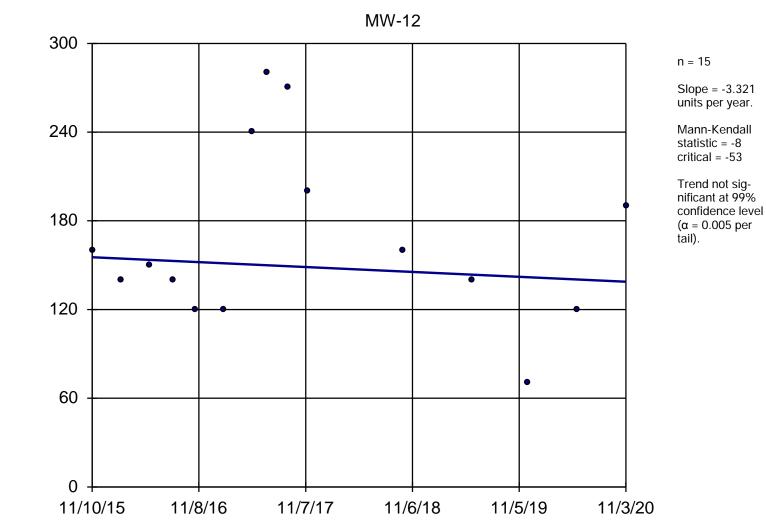
Constituent: Chloride Analysis Run 4/2/2021 12:06 PM



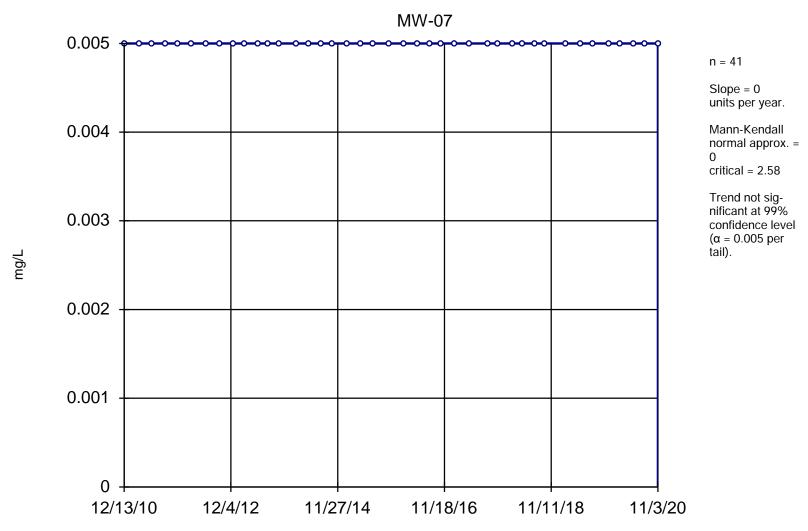
Constituent: Chloride Analysis Run 4/2/2021 12:06 PM

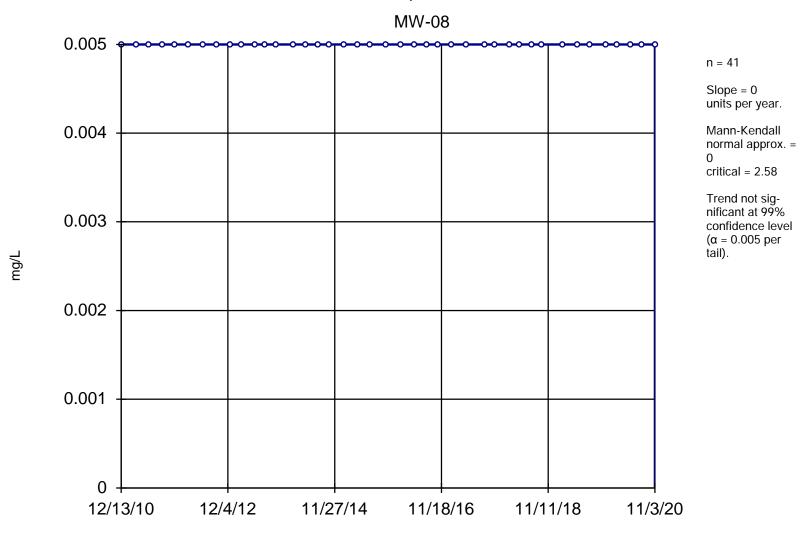
mg/L

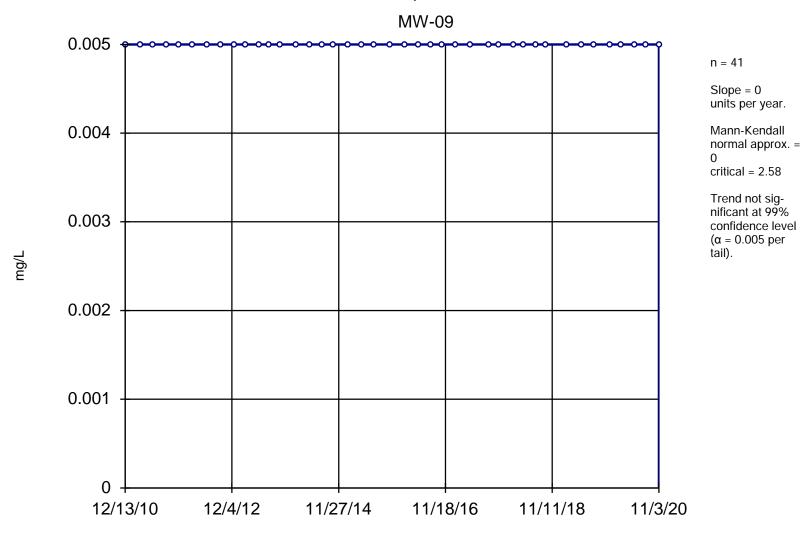
### Sen's Slope Estimator

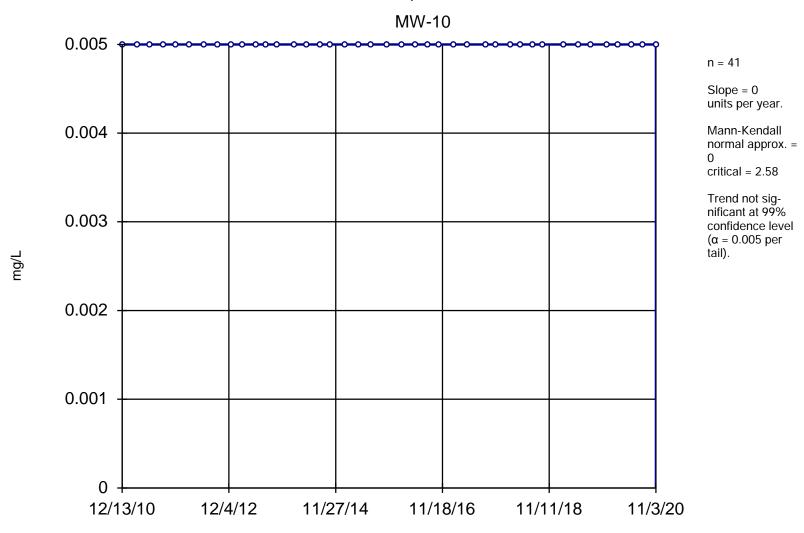


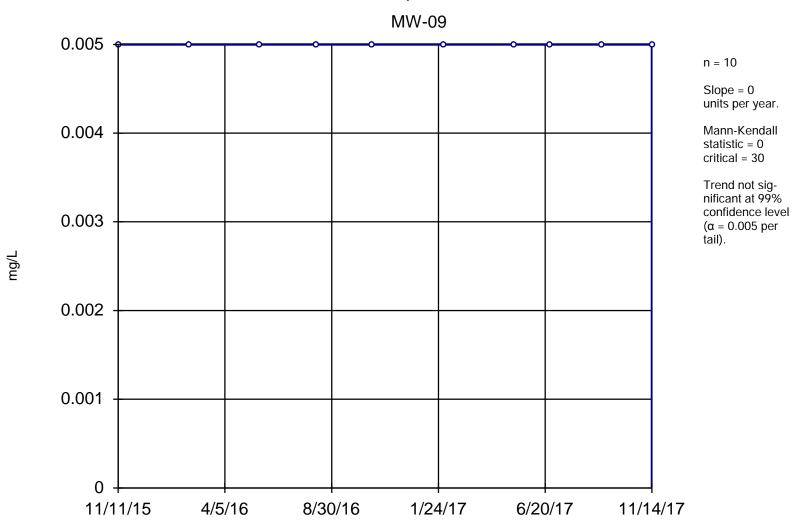
Constituent: Chloride Analysis Run 4/2/2021 12:06 PM



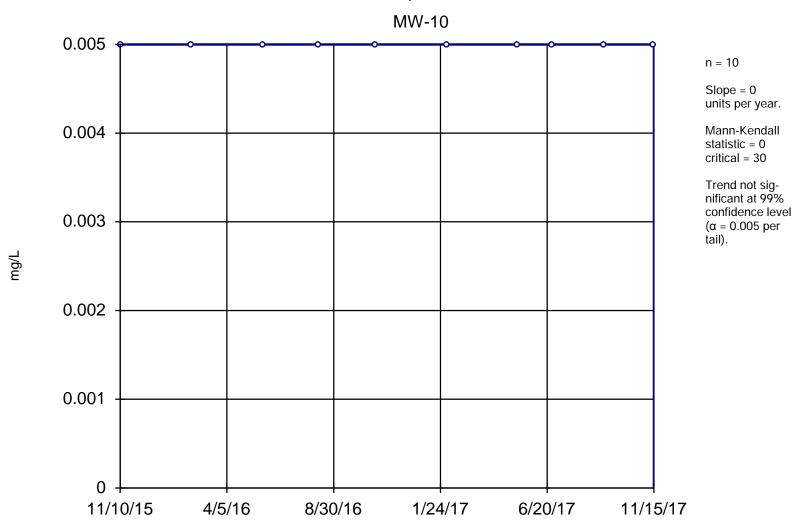




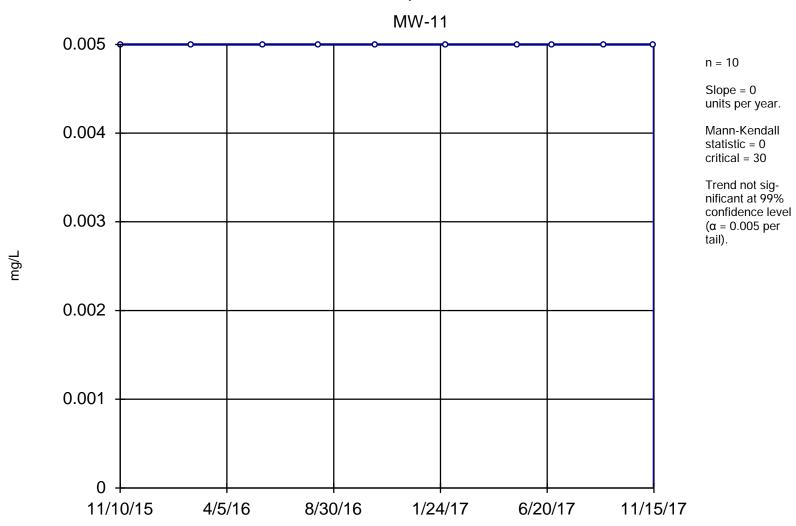




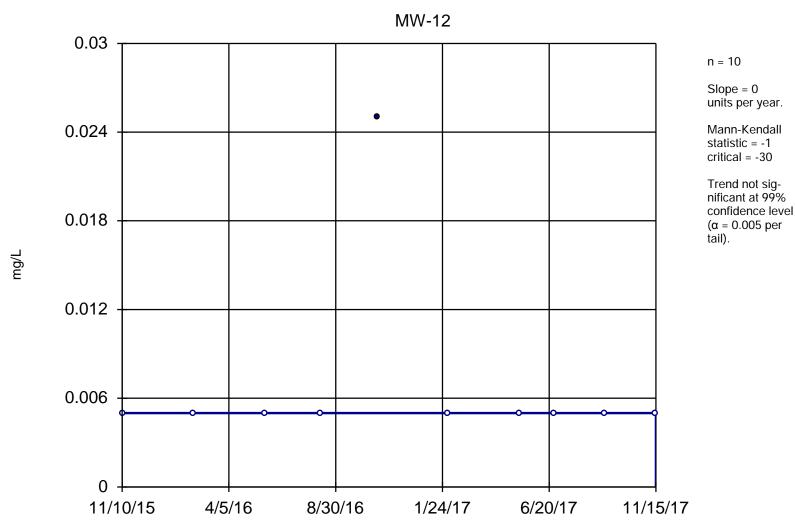
Constituent: Chromium, Total Analysis Run 4/2/2021 12:06 PM

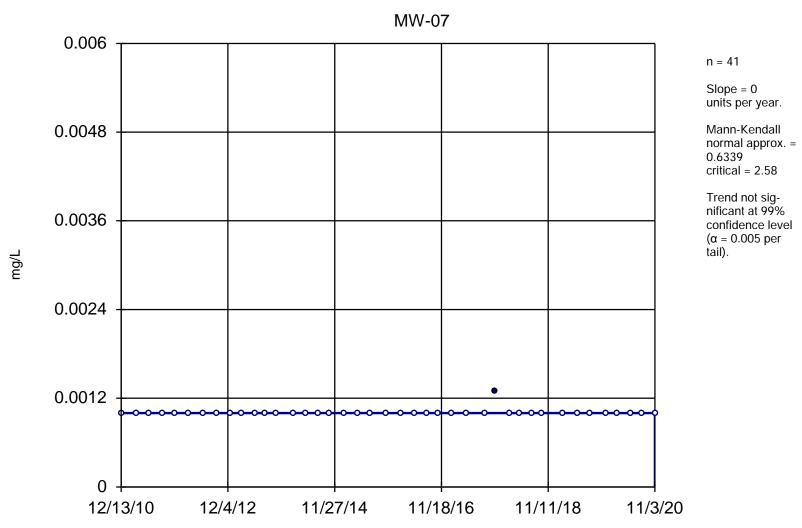


Constituent: Chromium, Total Analysis Run 4/2/2021 12:06 PM

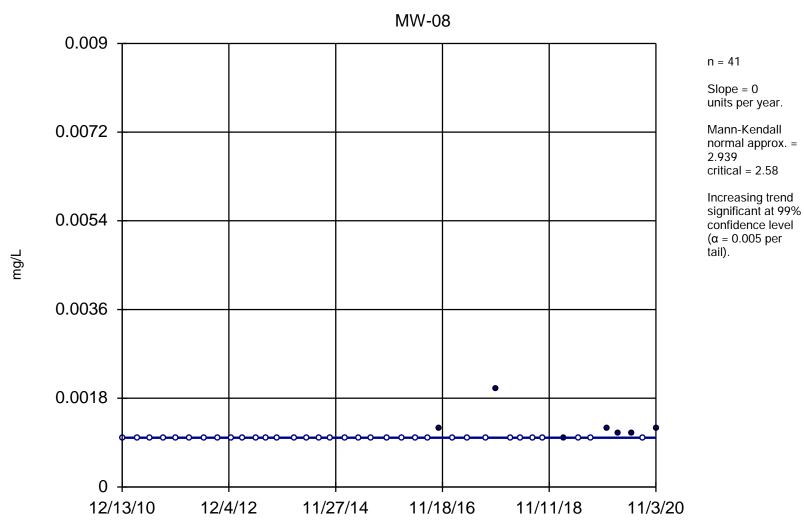


Constituent: Chromium, Total Analysis Run 4/2/2021 12:06 PM

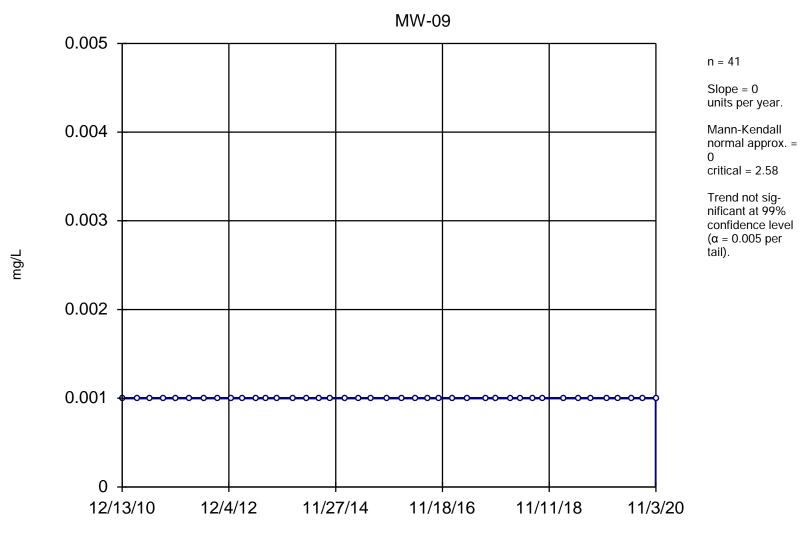




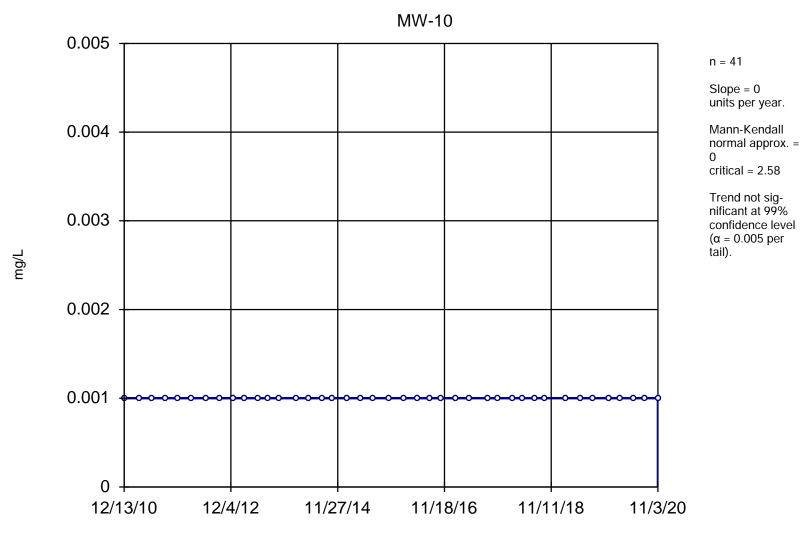
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 12:06 PM



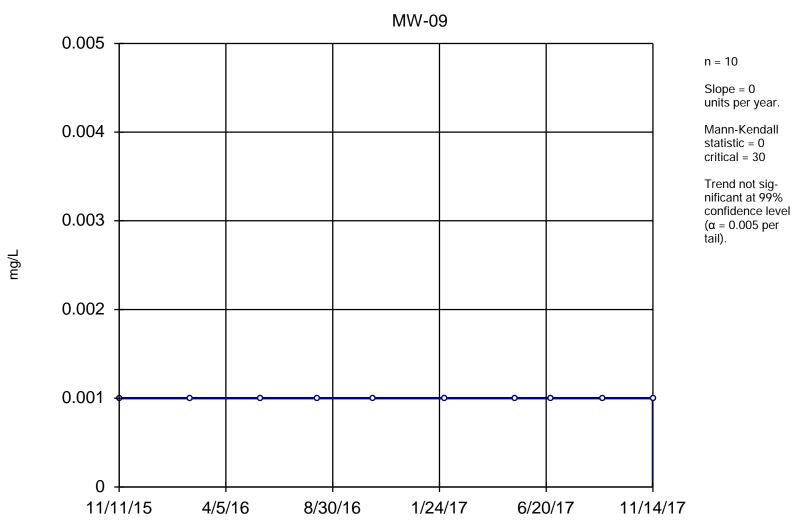
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 12:06 PM



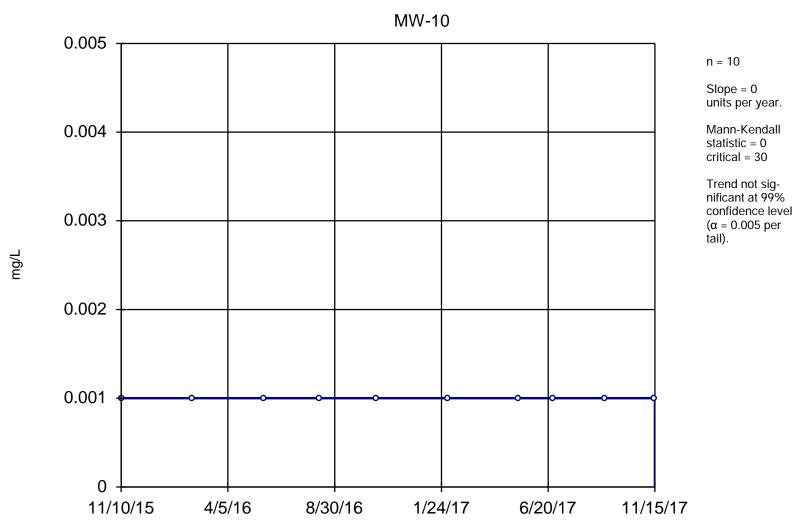
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 12:06 PM



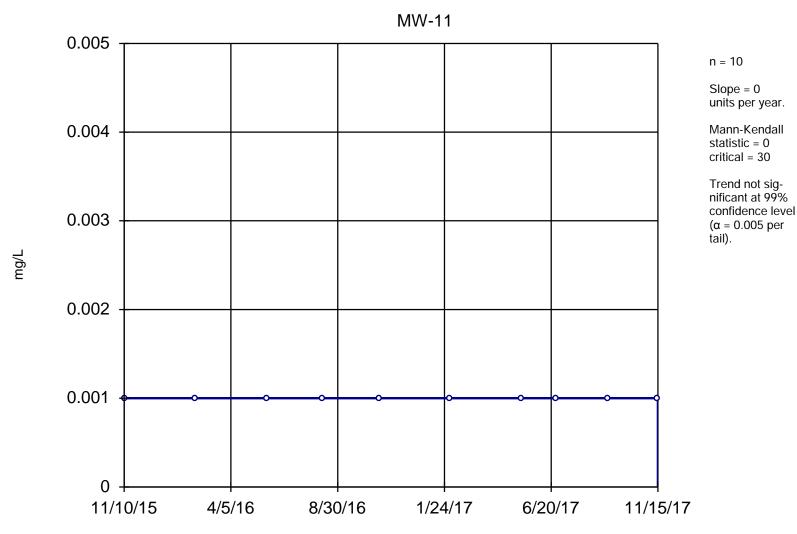
Constituent: Cobalt, Dissolved Analysis Run 4/2/2021 12:06 PM



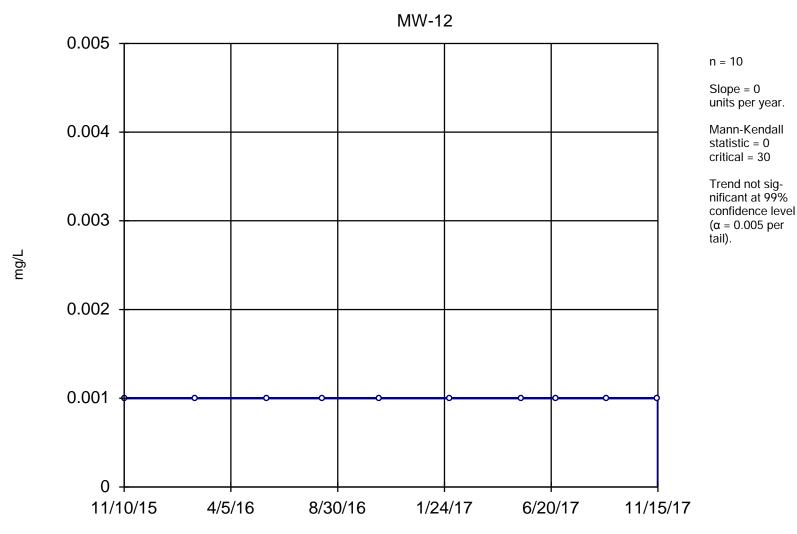
Constituent: Cobalt, Total Analysis Run 4/2/2021 12:06 PM



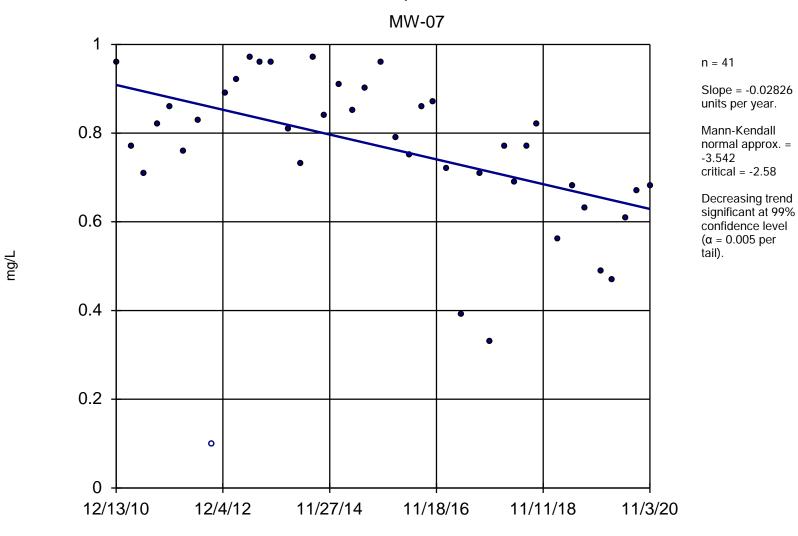
Constituent: Cobalt, Total Analysis Run 4/2/2021 12:06 PM



Constituent: Cobalt, Total Analysis Run 4/2/2021 12:06 PM



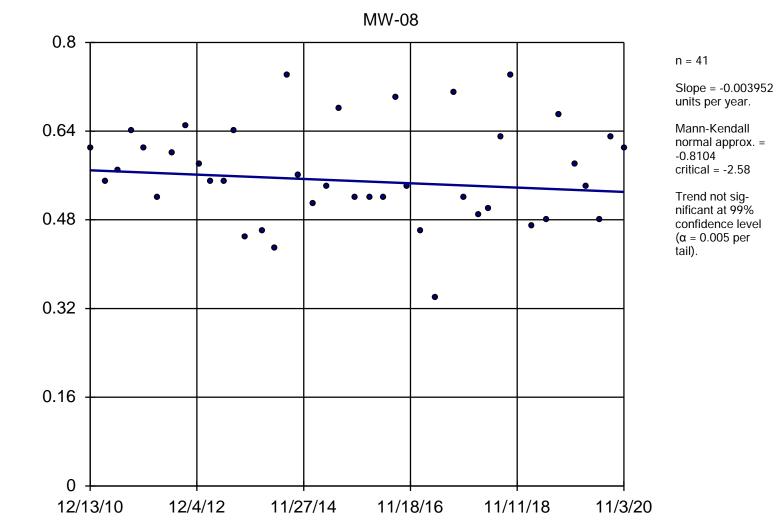
Constituent: Cobalt, Total Analysis Run 4/2/2021 12:06 PM



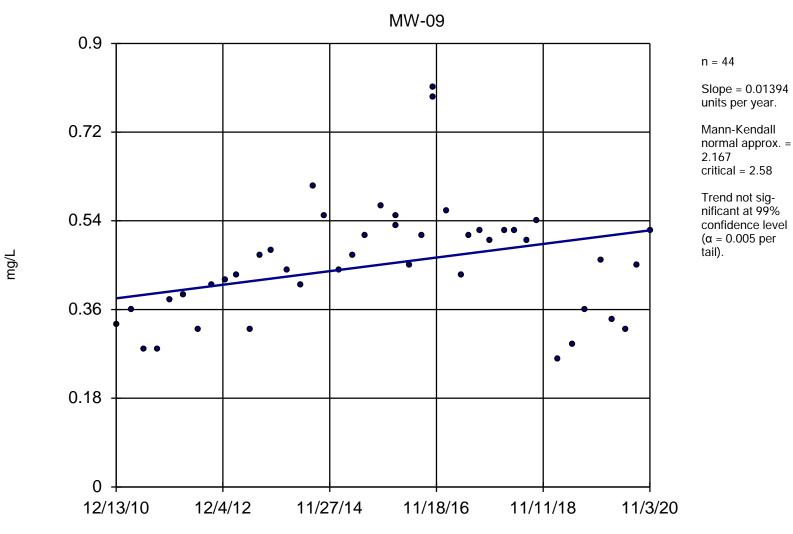
Constituent: Fluoride Analysis Run 4/2/2021 12:06 PM

mg/L

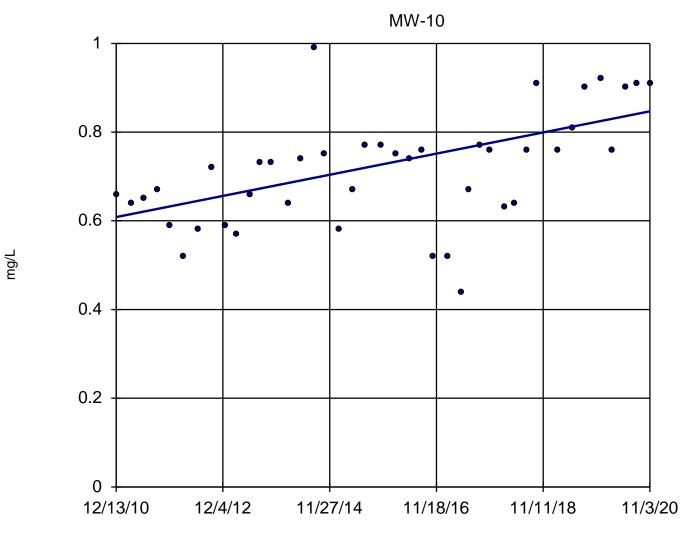
### Sen's Slope Estimator



Constituent: Fluoride Analysis Run 4/2/2021 12:06 PM



Constituent: Fluoride Analysis Run 4/2/2021 12:06 PM



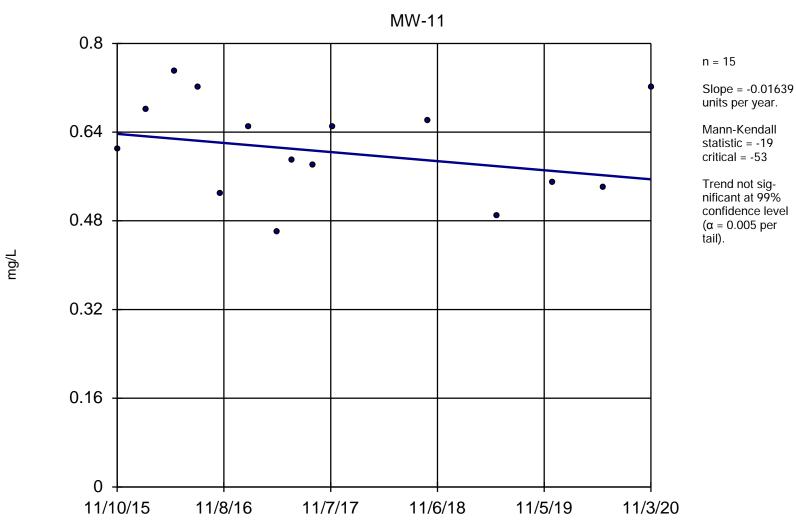
n = 42

Slope = 0.02406 units per year.

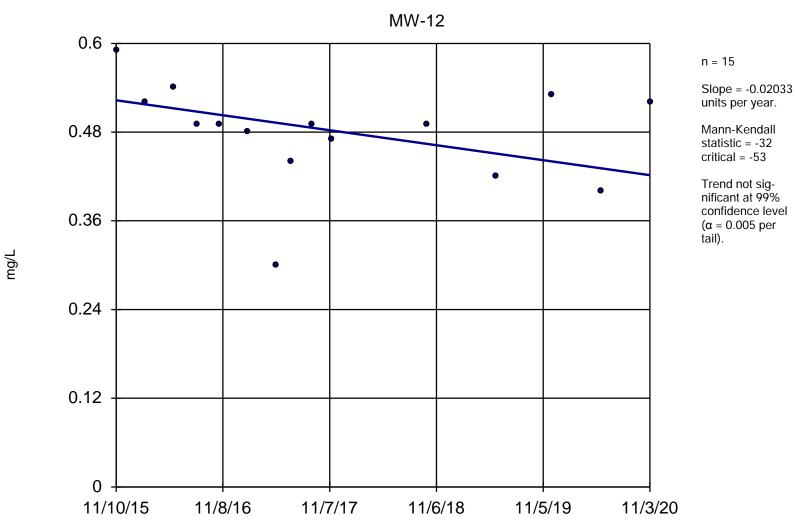
Mann-Kendall normal approx. = 3.998 critical = 2.58

Increasing trend significant at 99% confidence level ( $\alpha = 0.005$  per tail).

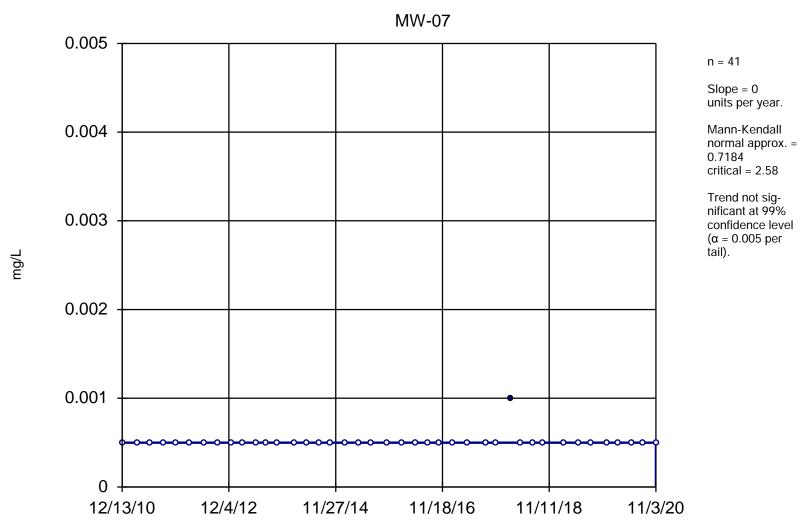
Constituent: Fluoride Analysis Run 4/2/2021 12:06 PM



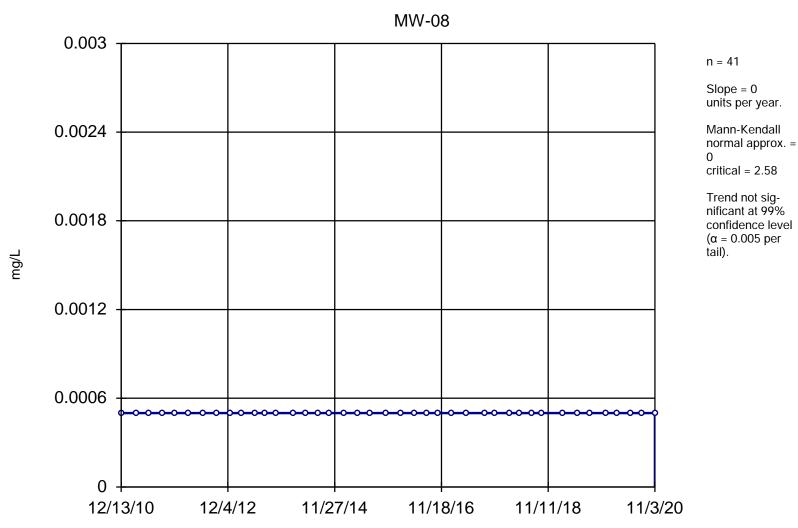
Constituent: Fluoride Analysis Run 4/2/2021 12:06 PM



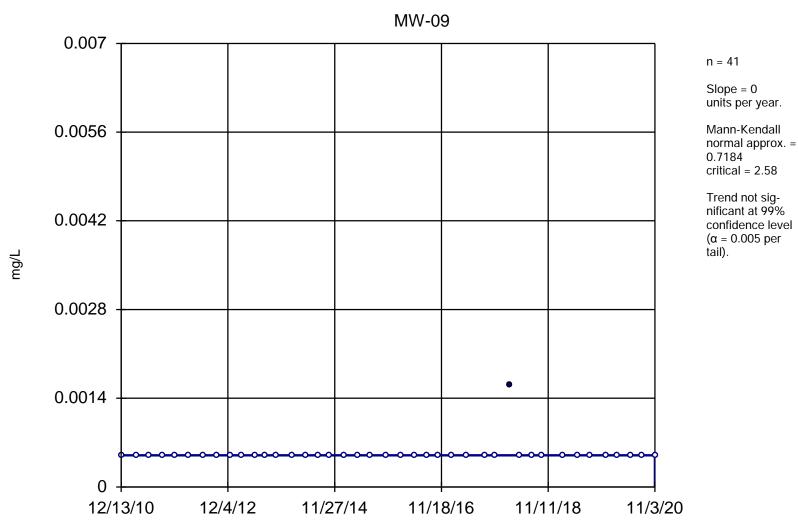
Constituent: Fluoride Analysis Run 4/2/2021 12:06 PM



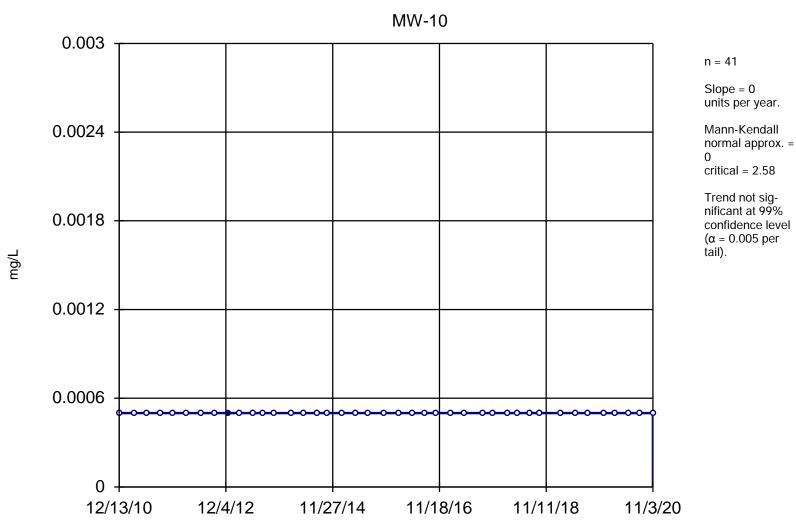
Constituent: Lead, Dissolved Analysis Run 4/2/2021 12:06 PM



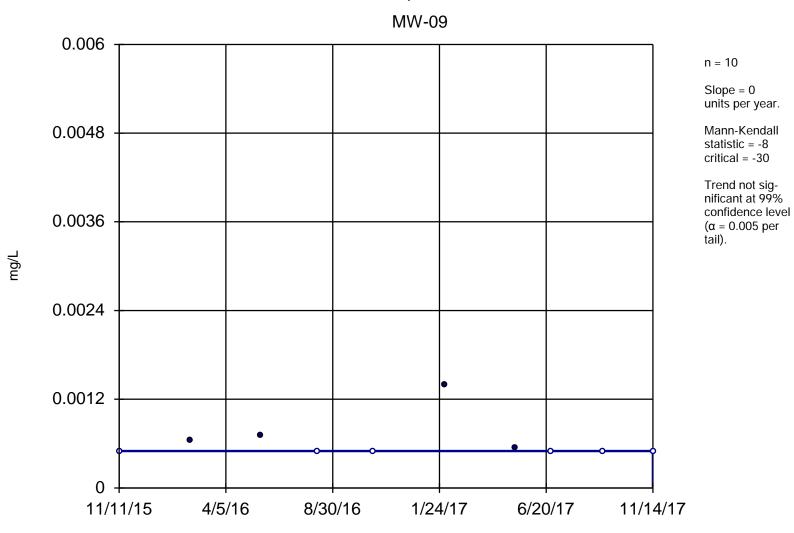
Constituent: Lead, Dissolved Analysis Run 4/2/2021 12:06 PM



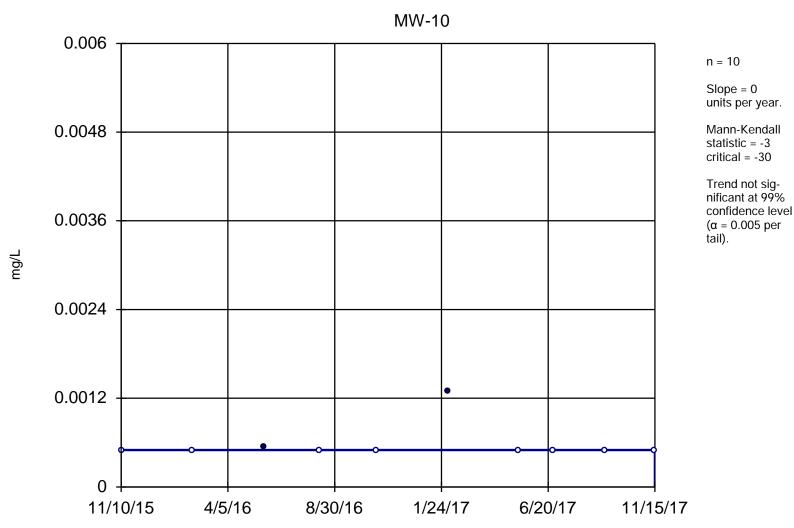
Constituent: Lead, Dissolved Analysis Run 4/2/2021 12:06 PM



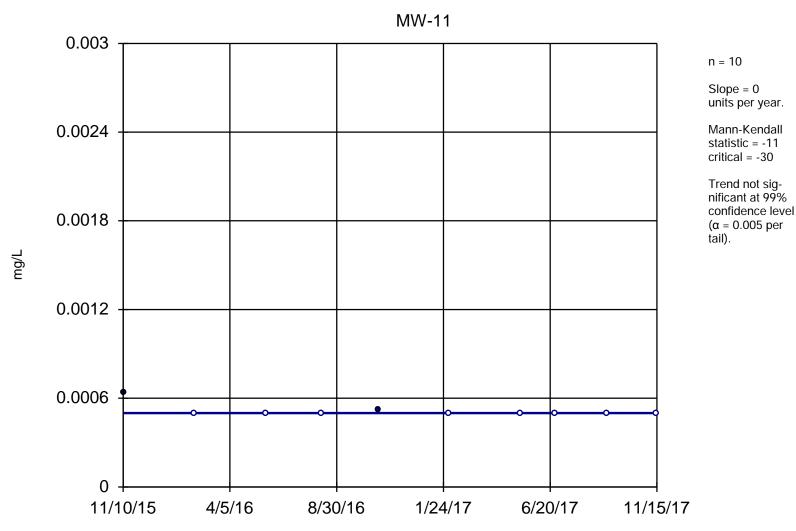
Constituent: Lead, Dissolved Analysis Run 4/2/2021 12:06 PM



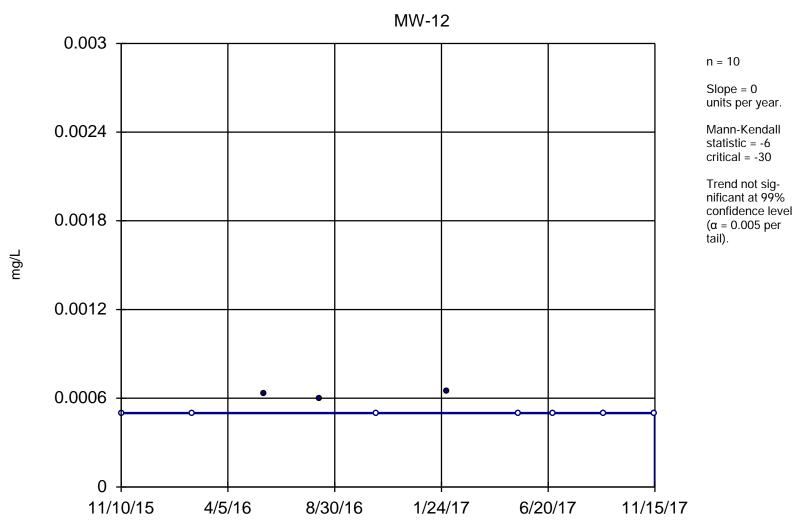
Constituent: Lead, Total Analysis Run 4/2/2021 12:06 PM



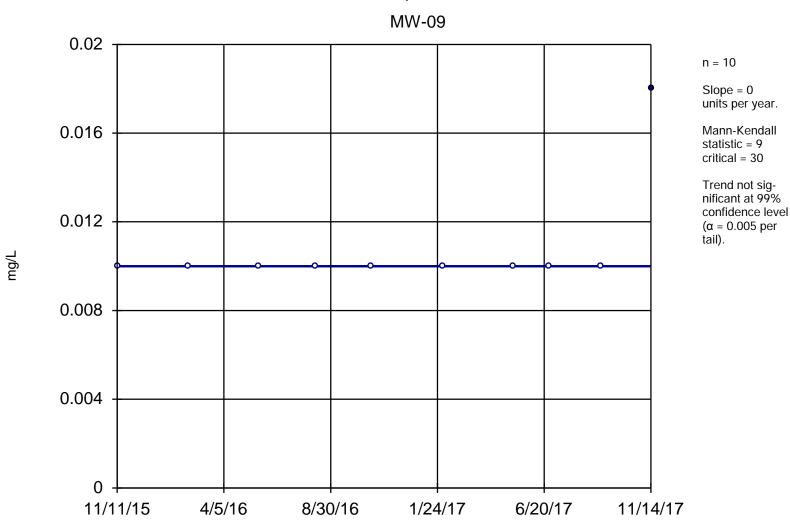
Constituent: Lead, Total Analysis Run 4/2/2021 12:06 PM



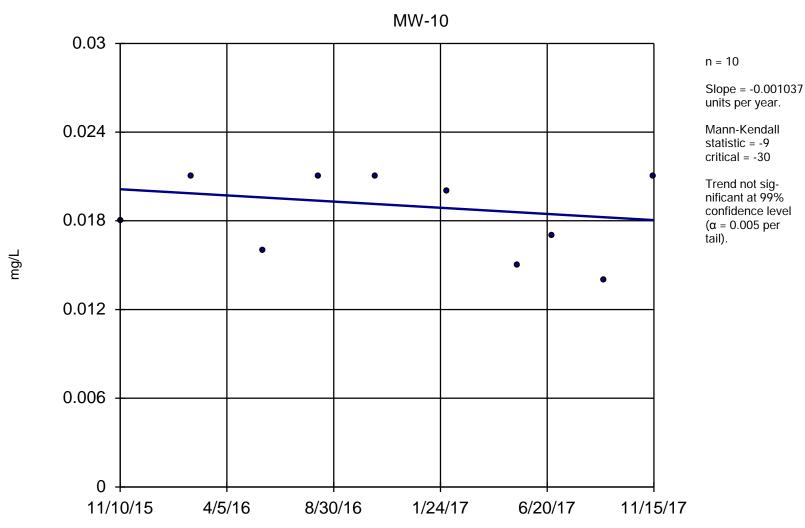
Constituent: Lead, Total Analysis Run 4/2/2021 12:06 PM



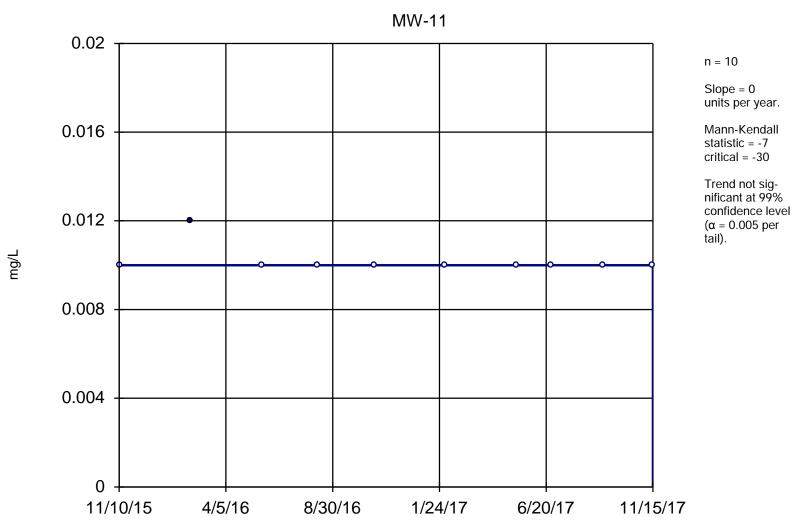
Constituent: Lead, Total Analysis Run 4/2/2021 12:06 PM



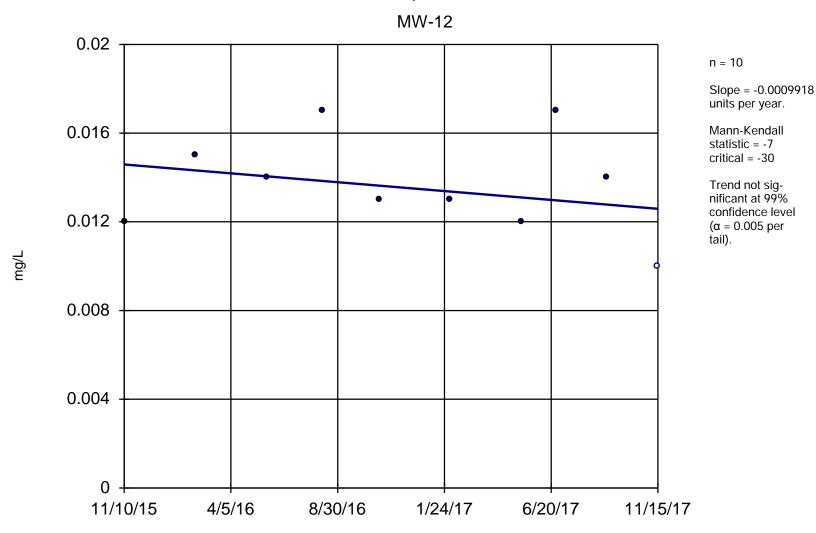
Constituent: Lithium, Total Analysis Run 4/2/2021 12:06 PM



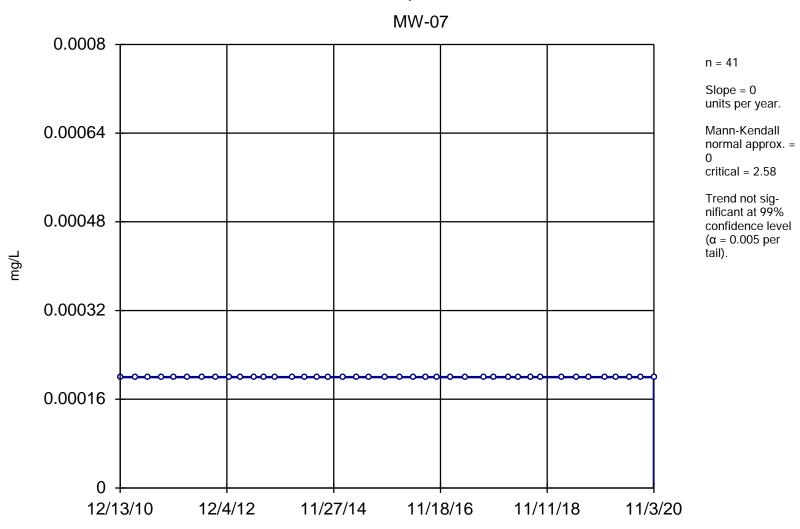
Constituent: Lithium, Total Analysis Run 4/2/2021 12:06 PM



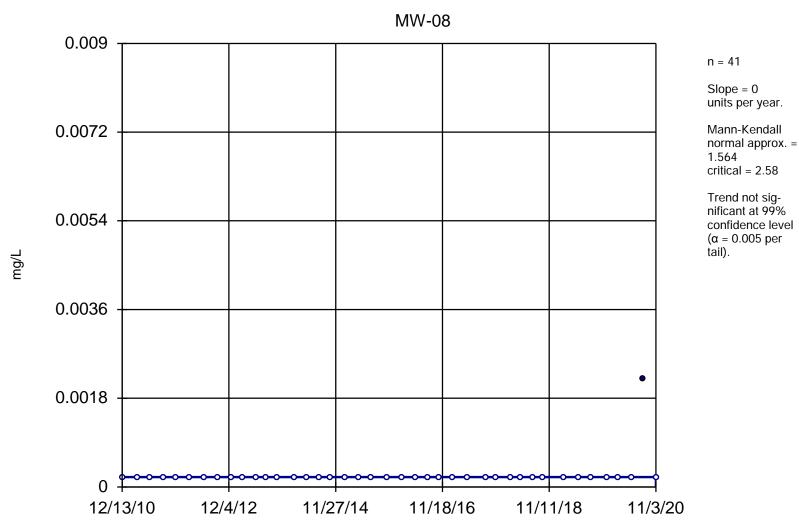
Constituent: Lithium, Total Analysis Run 4/2/2021 12:06 PM



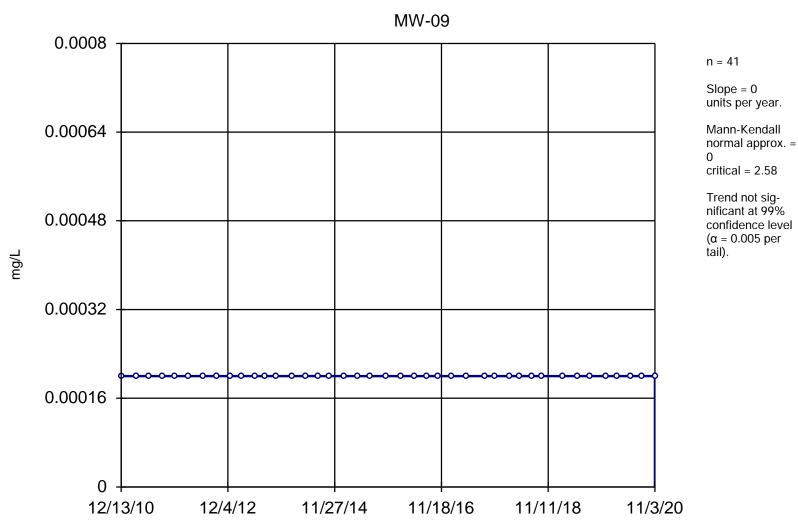
Constituent: Lithium, Total Analysis Run 4/2/2021 12:06 PM



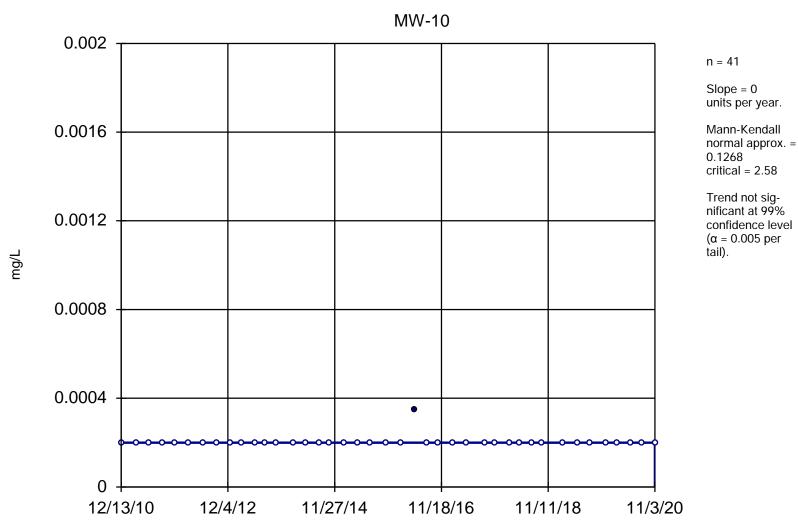
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 12:07 PM



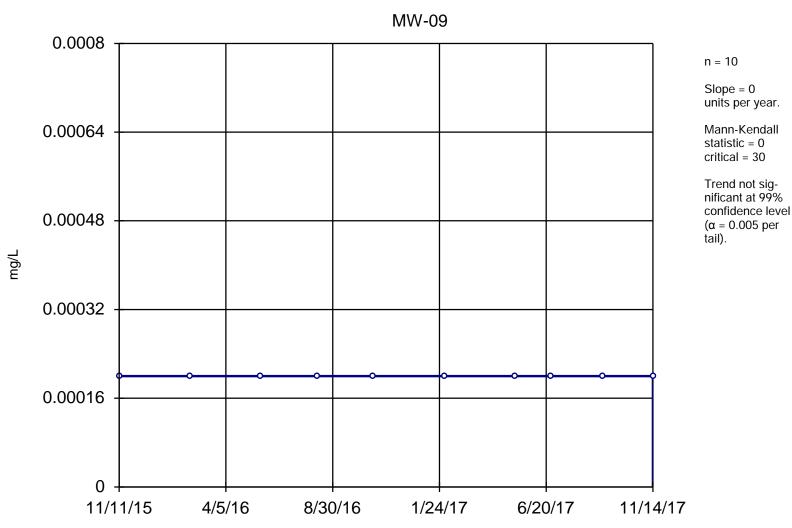
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 12:07 PM



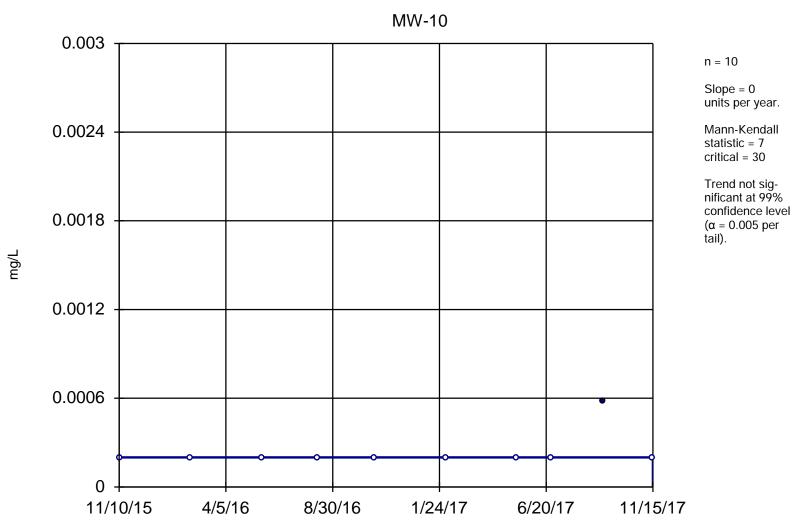
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 12:07 PM



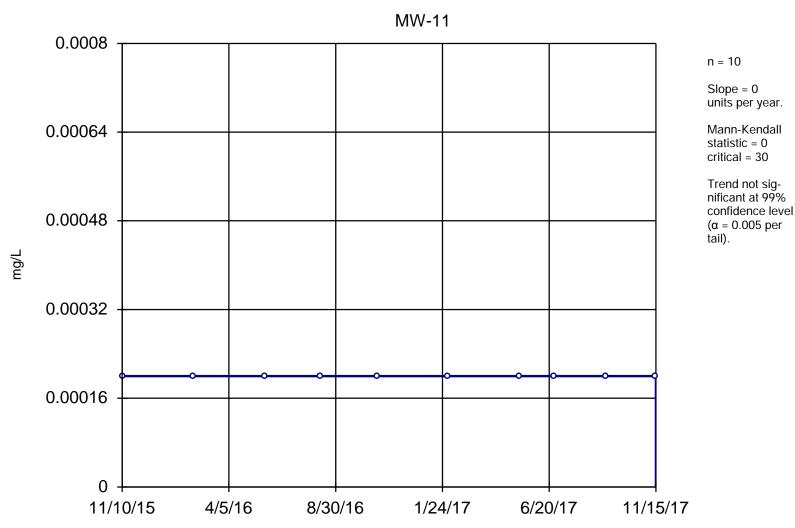
Constituent: Mercury, Dissolved Analysis Run 4/2/2021 12:07 PM



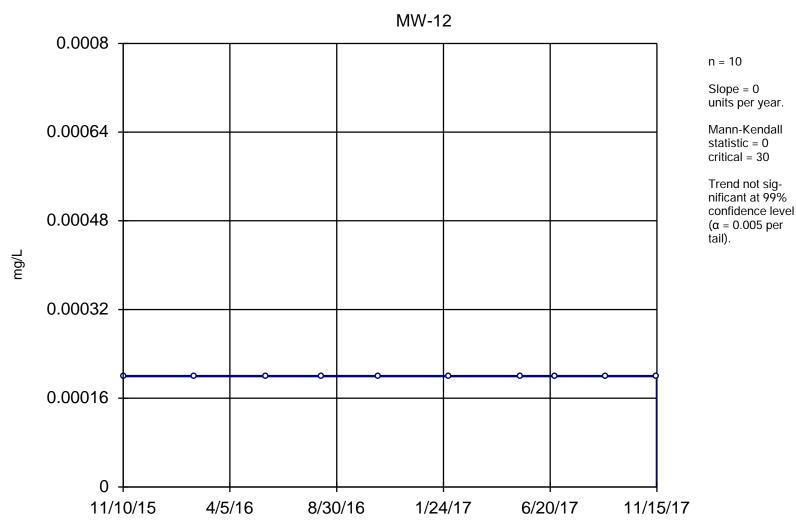
Constituent: Mercury, Total Analysis Run 4/2/2021 12:07 PM



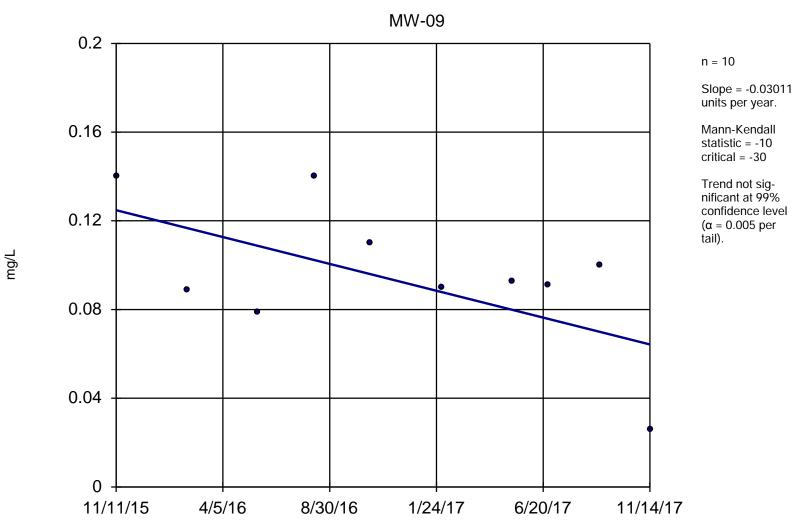
Constituent: Mercury, Total Analysis Run 4/2/2021 12:07 PM



Constituent: Mercury, Total Analysis Run 4/2/2021 12:07 PM

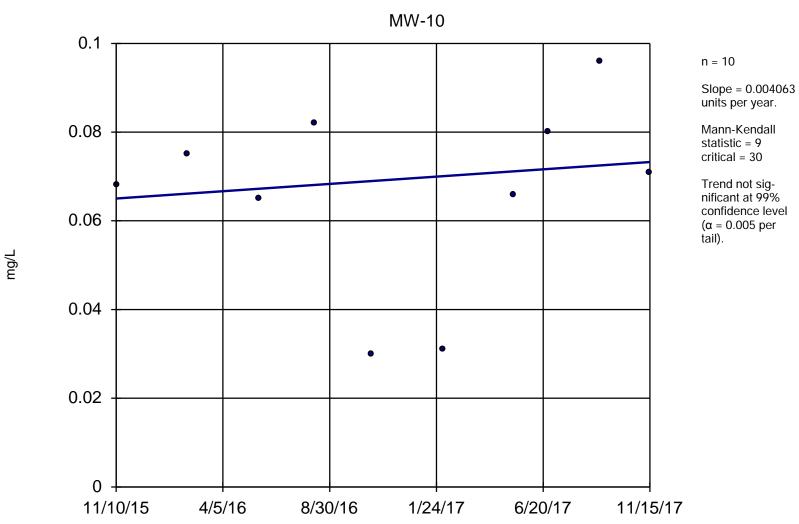


Constituent: Mercury, Total Analysis Run 4/2/2021 12:07 PM

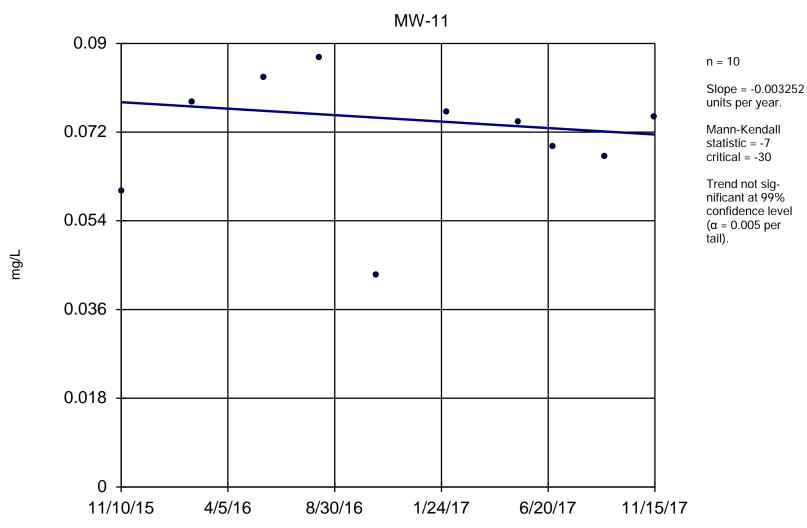


Constituent: Molybdenum, Total Analysis Run 4/2/2021 12:07 PM

Utility Site WC Client: Weaver Consultants Group Data: Will County Sanitas Database



Constituent: Molybdenum, Total Analysis Run 4/2/2021 12:07 PM

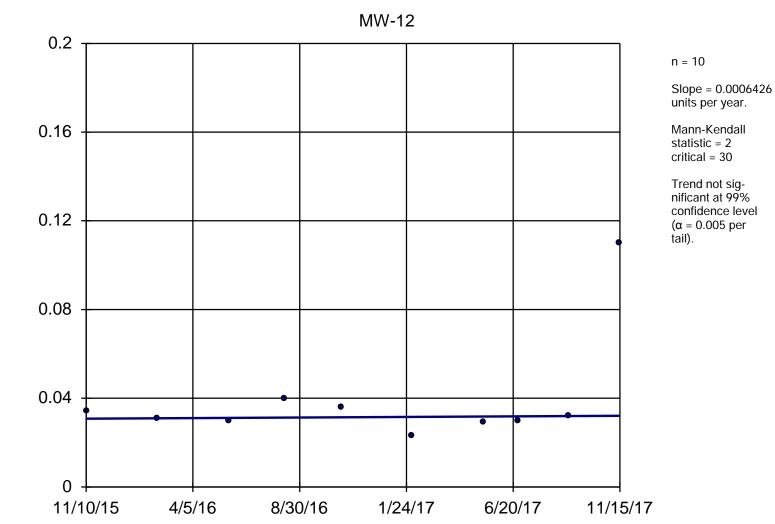


Constituent: Molybdenum, Total Analysis Run 4/2/2021 12:07 PM

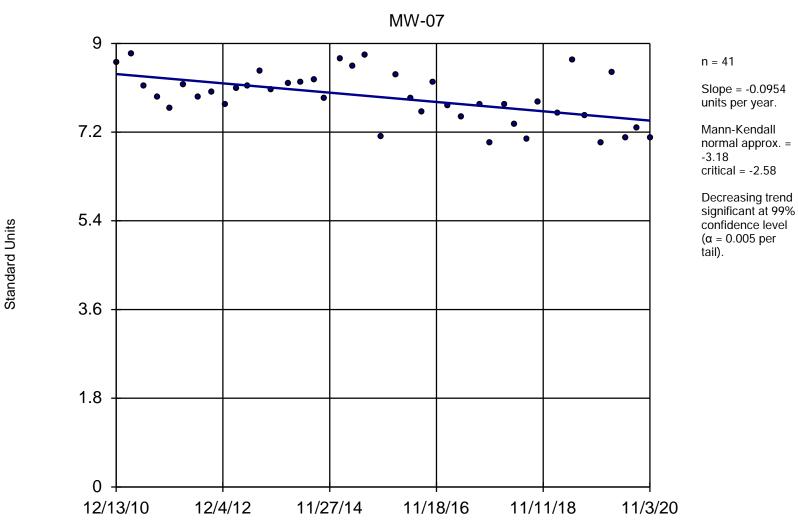
Utility Site WC Client: Weaver Consultants Group Data: Will County Sanitas Database

mg/L

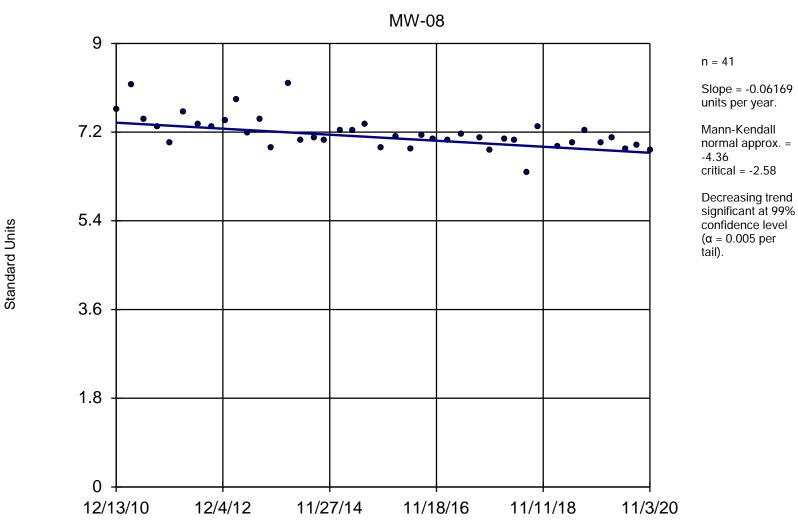
### Sen's Slope Estimator



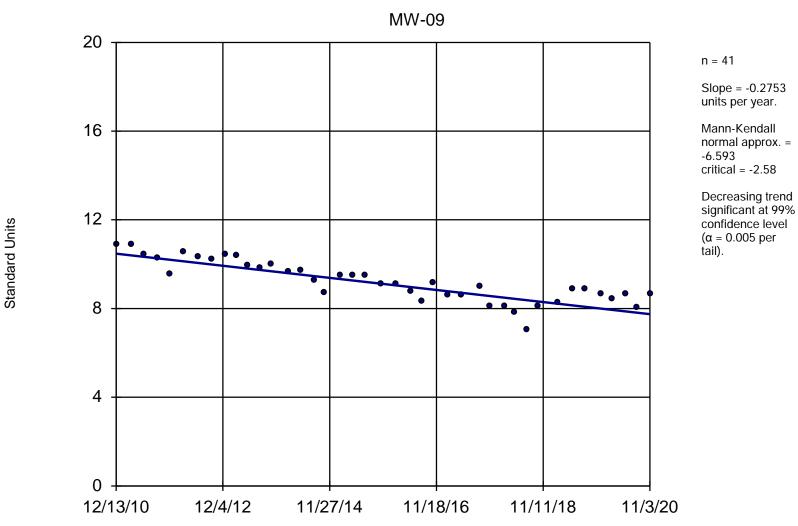
Constituent: Molybdenum, Total Analysis Run 4/2/2021 12:07 PM



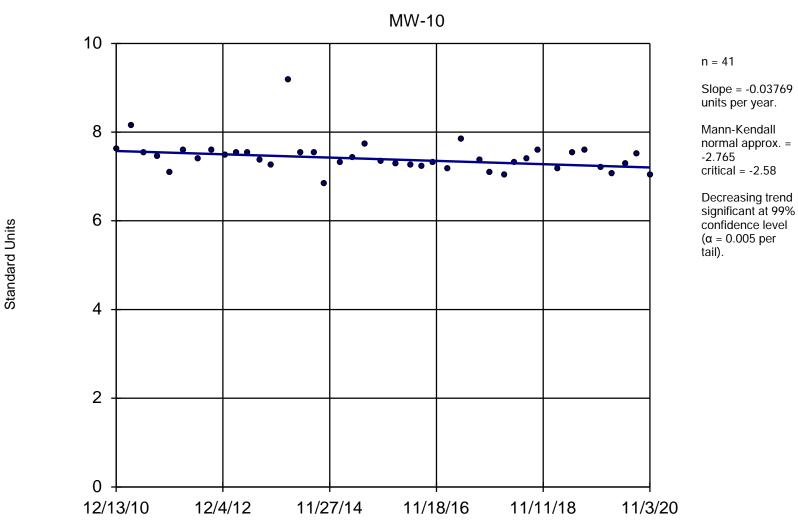
Constituent: pH, Field Analysis Run 4/2/2021 12:07 PM



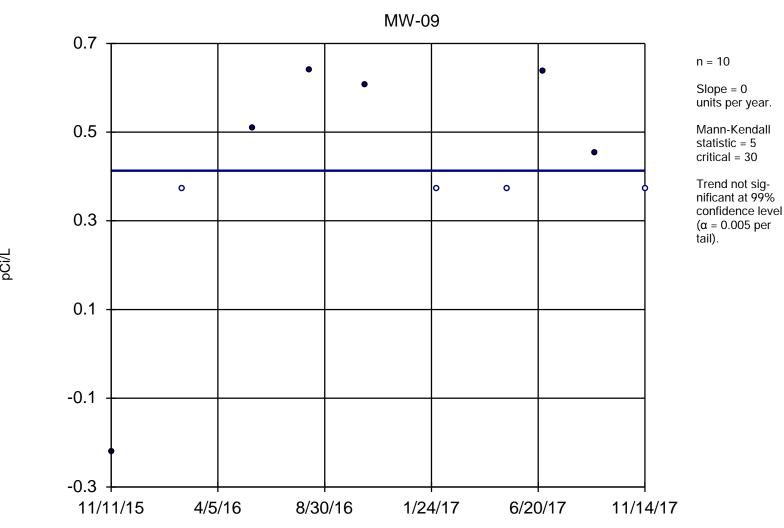
Constituent: pH, Field Analysis Run 4/2/2021 12:07 PM



Constituent: pH, Field Analysis Run 4/2/2021 12:07 PM

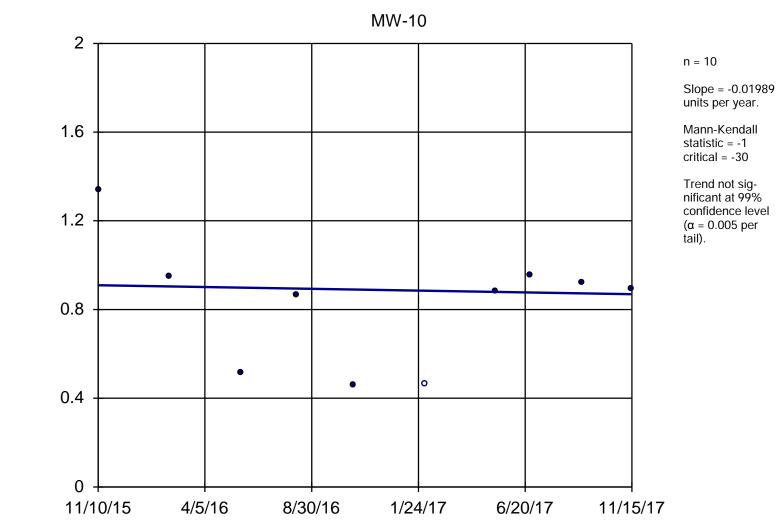


Constituent: pH, Field Analysis Run 4/2/2021 12:07 PM



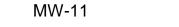
Constituent: Radium 226 + Radium 228, Combined Analysis Run 4/2/2021 12:07 PM

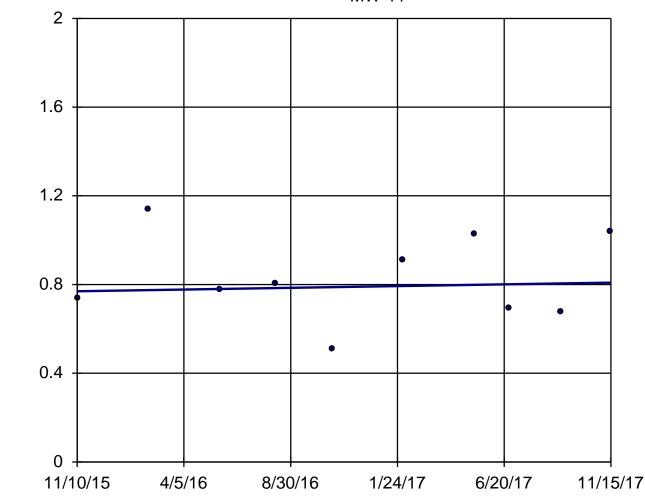
Utility Site WC Client: Weaver Consultants Group Data: Will County Sanitas Database



Constituent: Radium 226 + Radium 228, Combined Analysis Run 4/2/2021 12:07 PM

Utility Site WC Client: Weaver Consultants Group Data: Will County Sanitas Database





n = 10

Slope = 0.01931 units per year.

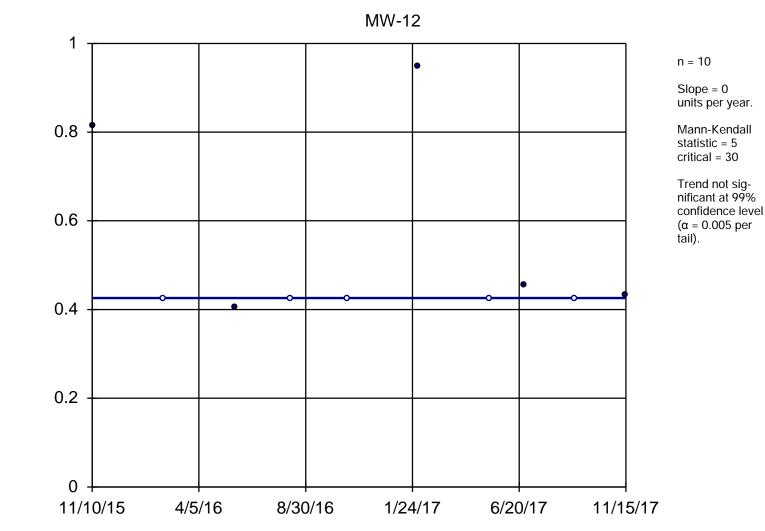
Mann-Kendall statistic = 1 critical = 30

Trend not significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

Analysis Run 4/2/2021 12:07 PM
Data: Will County Sanitas Database

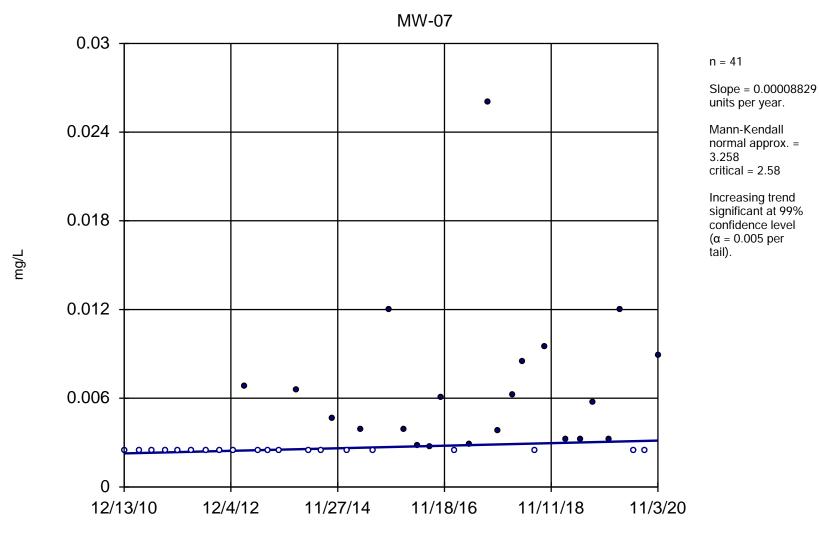
pCi/L

### Sen's Slope Estimator

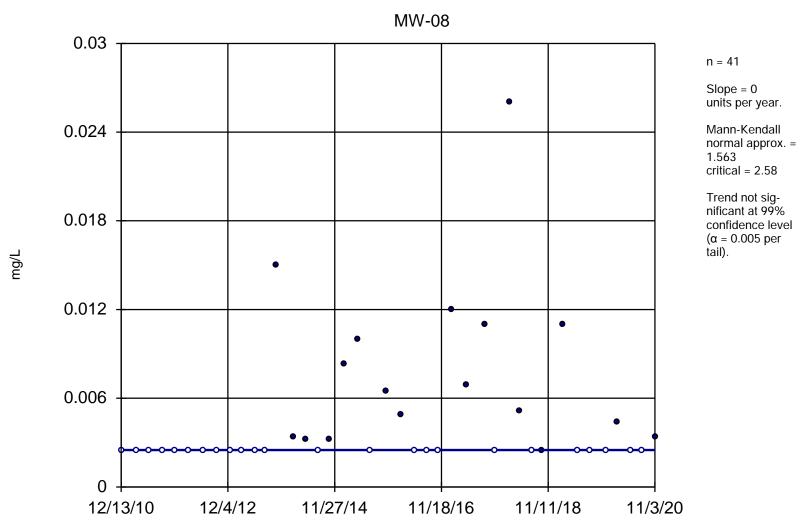


Constituent: Radium 226 + Radium 228, Combined Analysis Run 4/2/2021 12:07 PM

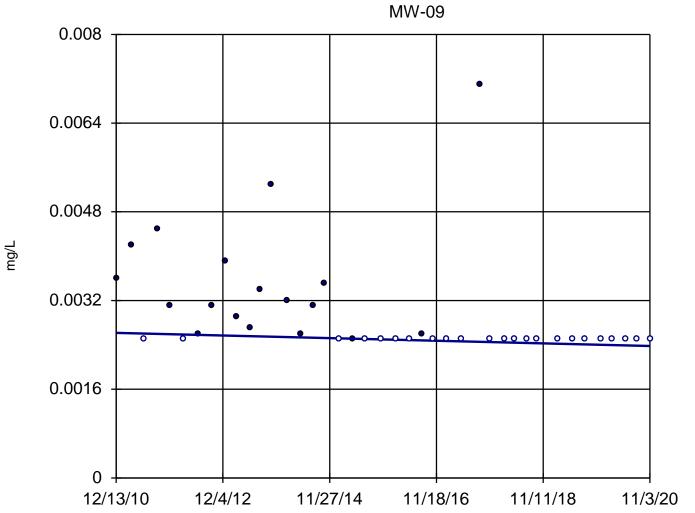
Utility Site WC Client: Weaver Consultants Group Data: Will County Sanitas Database



Constituent: Selenium, Dissolved Analysis Run 4/2/2021 12:07 PM
Utility Site WC Client: Weaver Consultants Group Data: Will County Sanitas Database



Constituent: Selenium, Dissolved Analysis Run 4/2/2021 12:07 PM
Utility Site WC Client: Weaver Consultants Group Data: Will County Sanitas Database



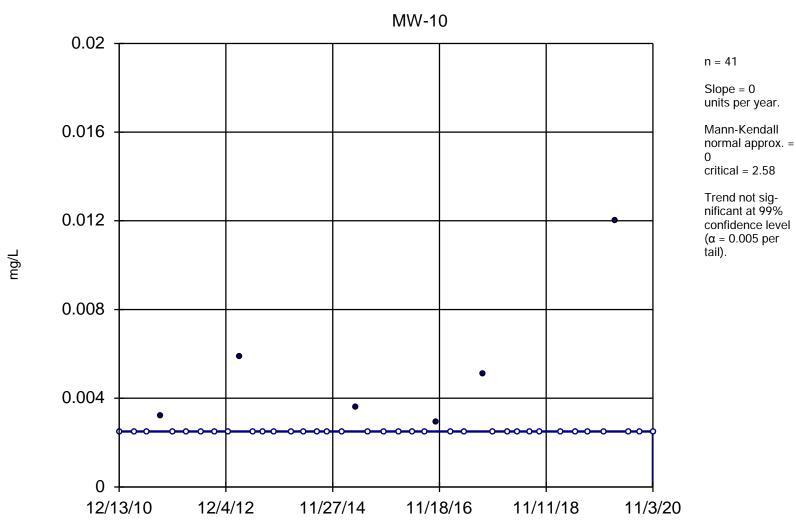
n = 41

Slope = -0.00002375 units per year.

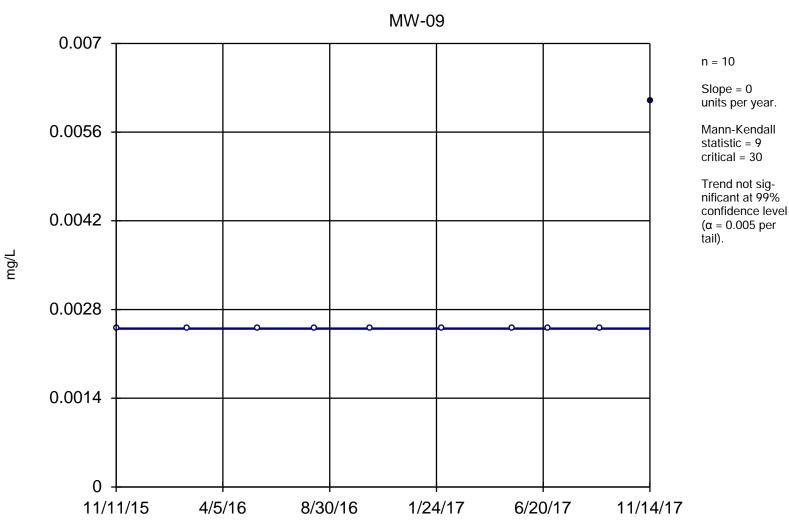
Mann-Kendall normal approx. = -4.197 critical = -2.58

Decreasing trend significant at 99% confidence level ( $\alpha = 0.005$  per tail).

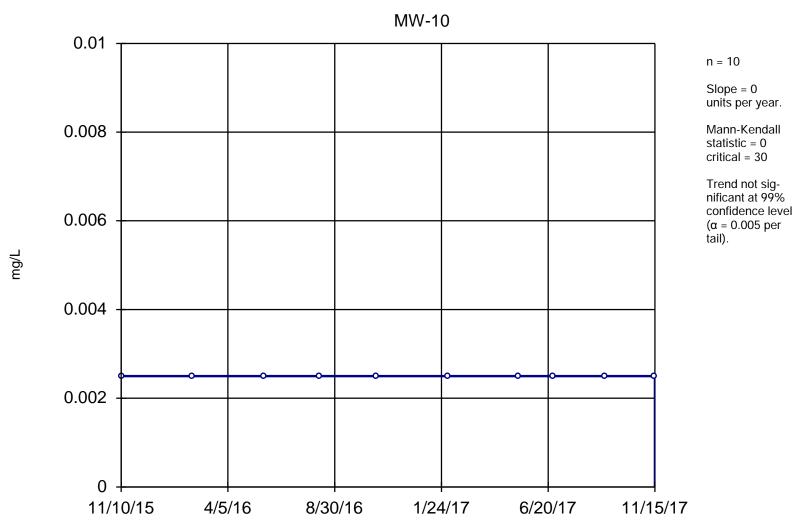
Constituent: Selenium, Dissolved Analysis Run 4/2/2021 12:07 PM



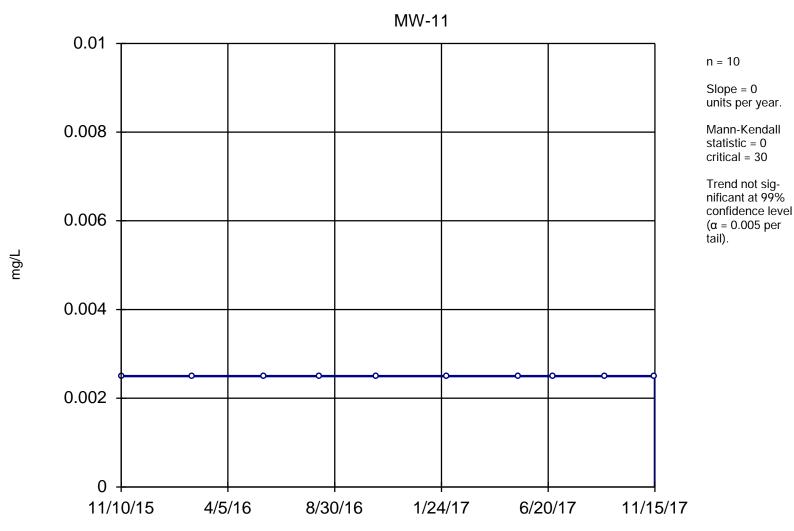
Constituent: Selenium, Dissolved Analysis Run 4/2/2021 12:07 PM
Utility Site WC Client: Weaver Consultants Group Data: Will County Sanitas Database



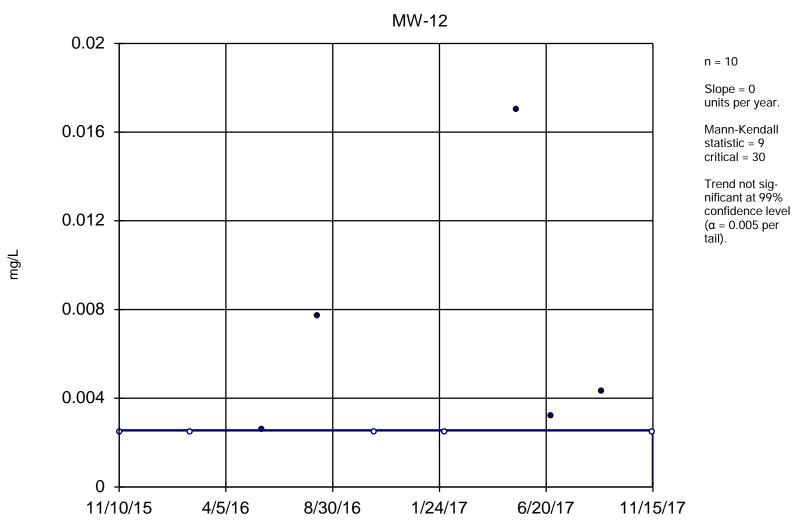
Constituent: Selenium, Total Analysis Run 4/2/2021 12:07 PM



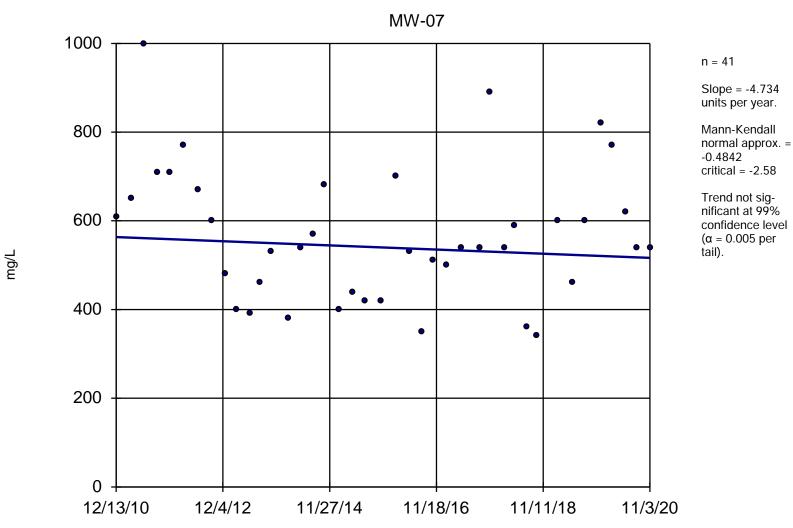
Constituent: Selenium, Total Analysis Run 4/2/2021 12:07 PM



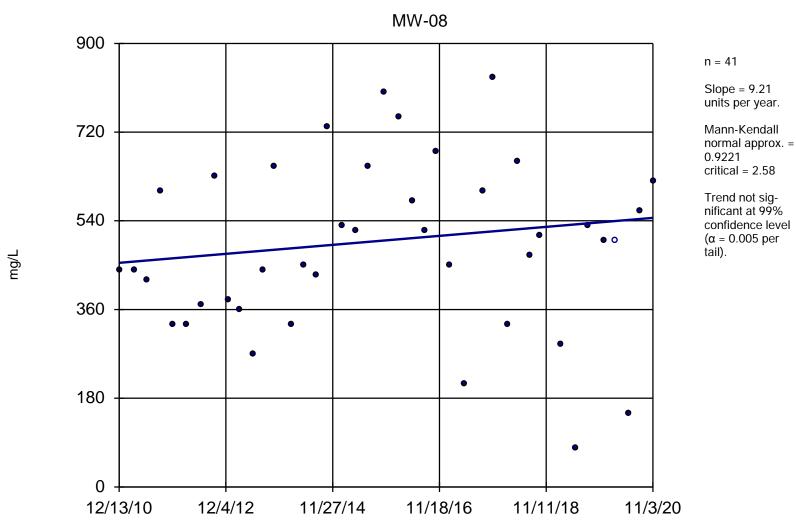
Constituent: Selenium, Total Analysis Run 4/2/2021 12:07 PM



Constituent: Selenium, Total Analysis Run 4/2/2021 12:07 PM



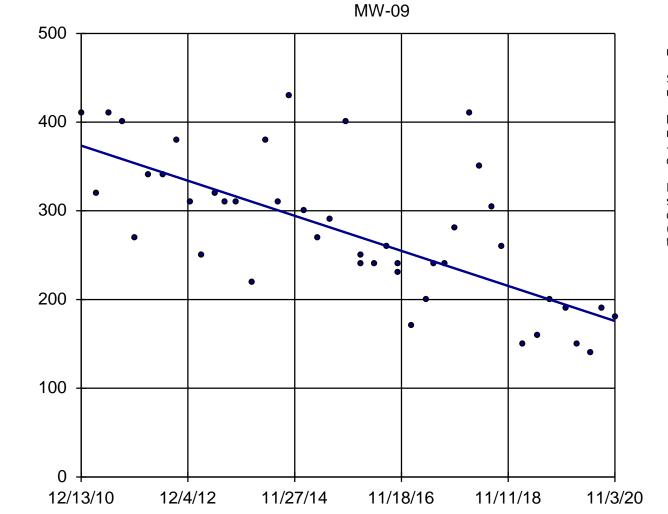
Constituent: Sulfate Analysis Run 4/2/2021 12:07 PM



Constituent: Sulfate Analysis Run 4/2/2021 12:07 PM

mg/L

### Sen's Slope Estimator



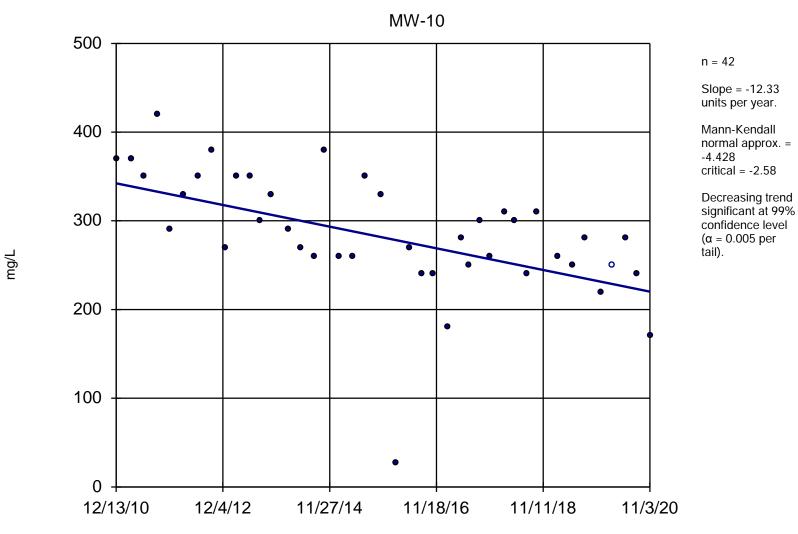
n = 44

Slope = -19.97 units per year.

Mann-Kendall normal approx. = -5.128 critical = -2.58

Decreasing trend significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

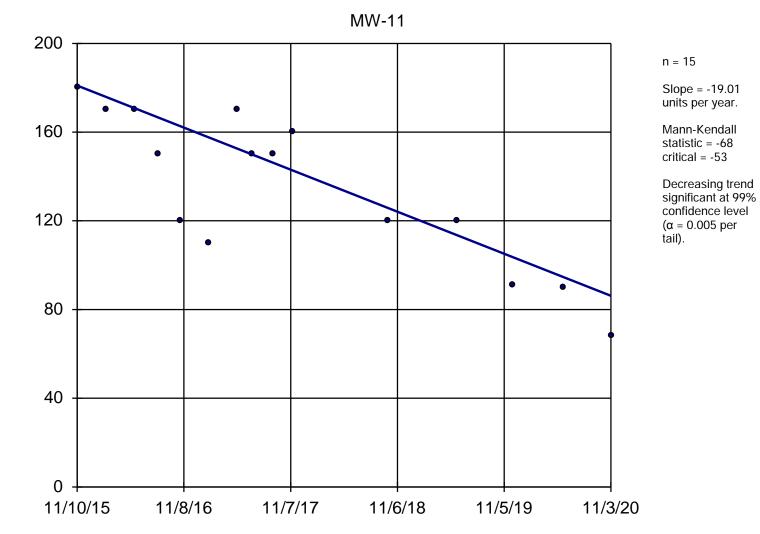
Constituent: Sulfate Analysis Run 4/2/2021 12:07 PM



Constituent: Sulfate Analysis Run 4/2/2021 12:07 PM

mg/L

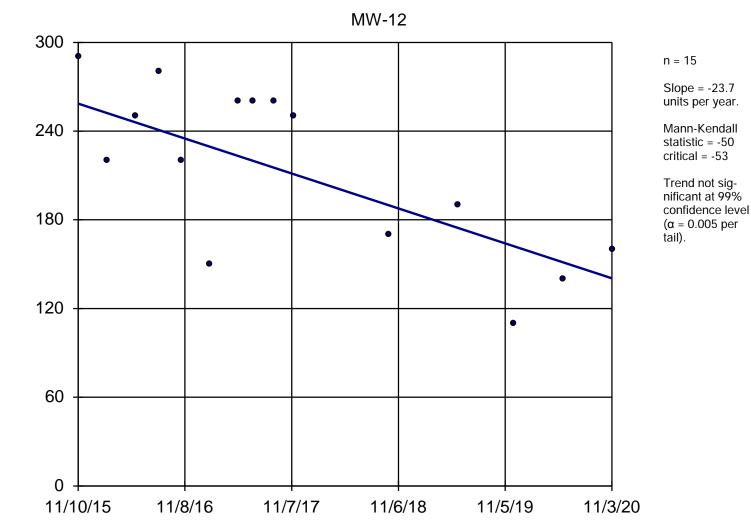
### Sen's Slope Estimator



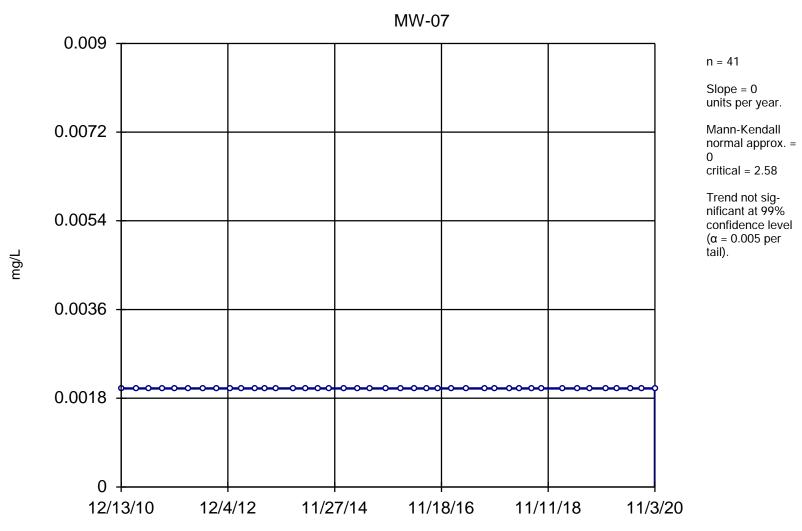
Constituent: Sulfate Analysis Run 4/2/2021 12:07 PM

mg/L

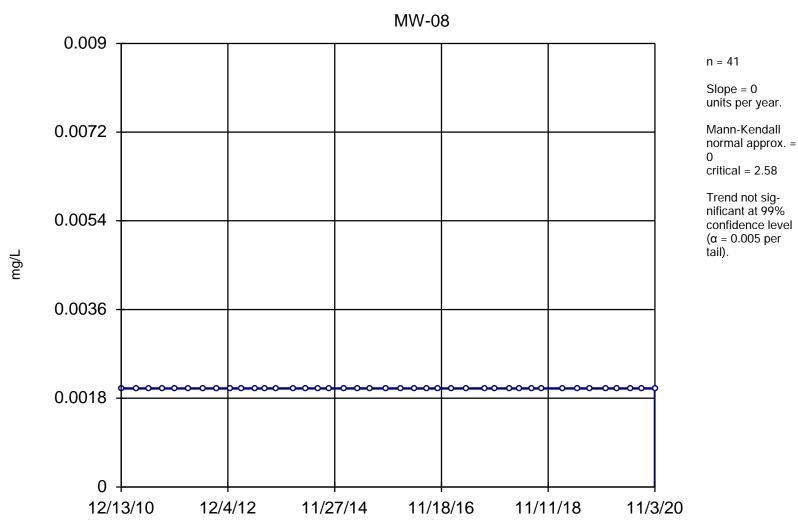
### Sen's Slope Estimator



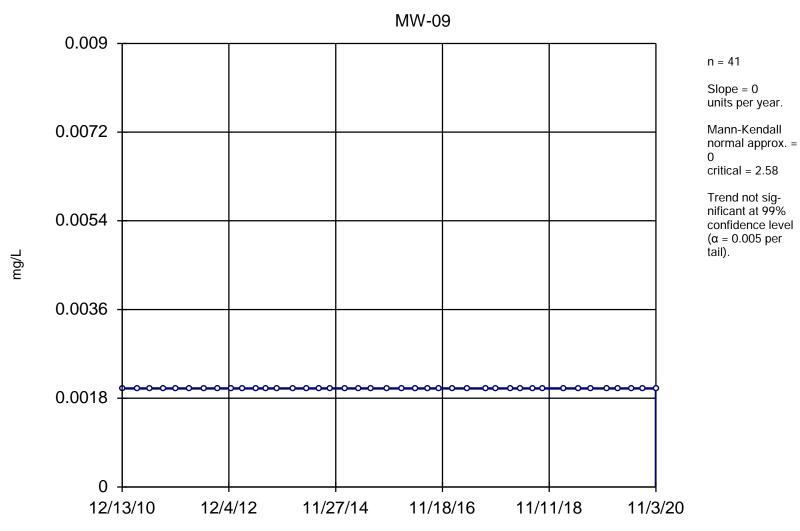
Constituent: Sulfate Analysis Run 4/2/2021 12:07 PM



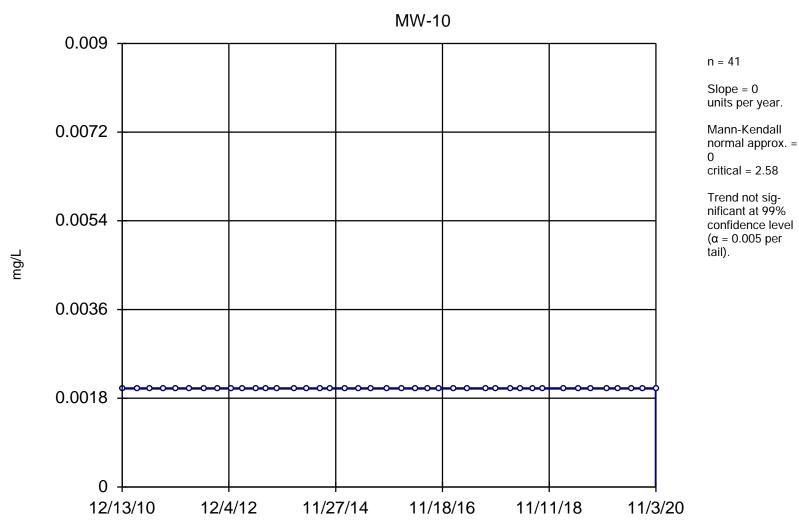
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 12:07 PM



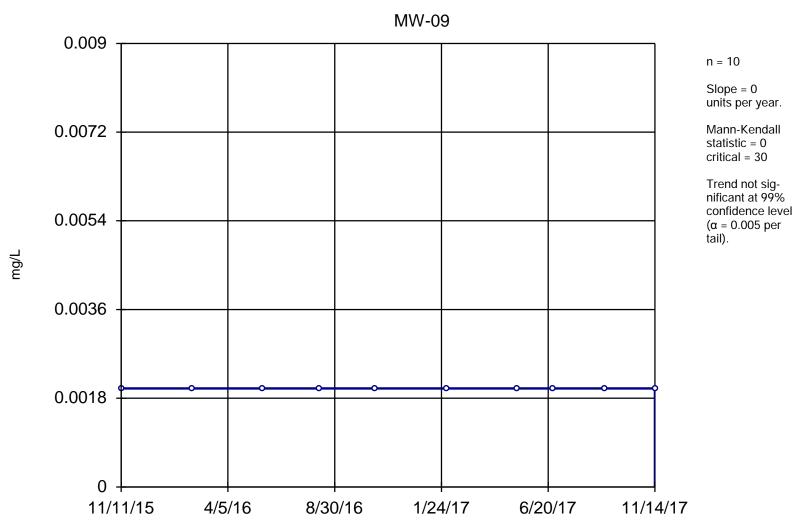
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 12:07 PM



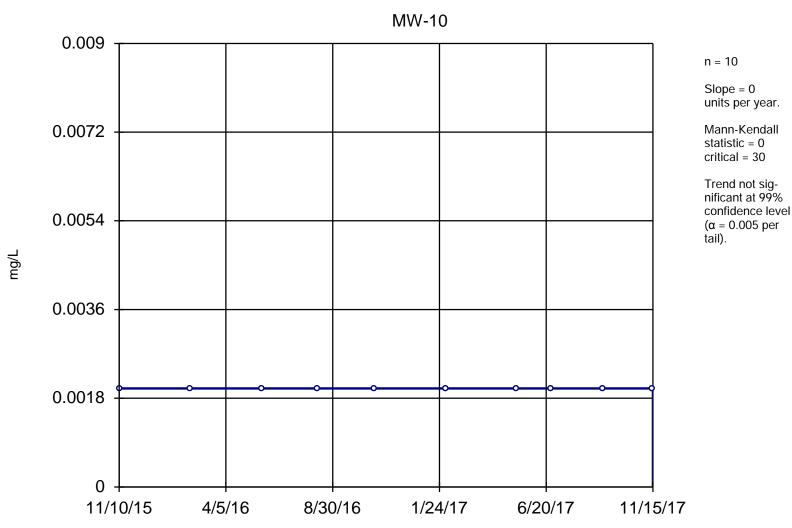
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 12:07 PM



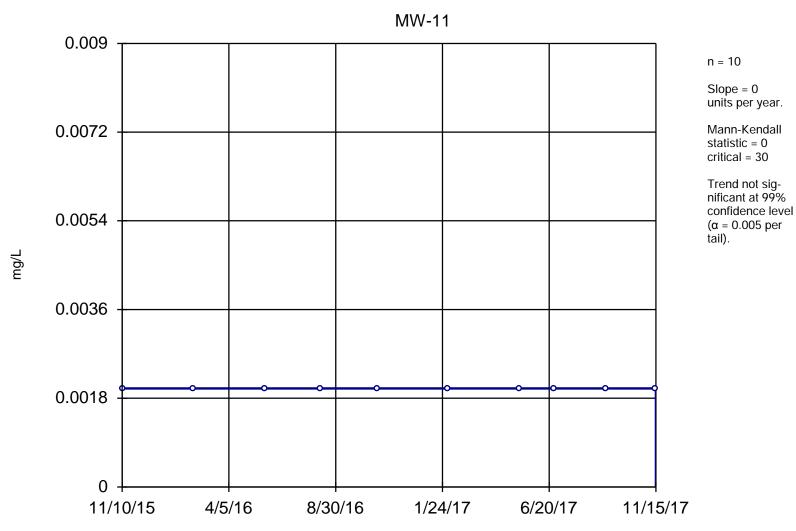
Constituent: Thallium, Dissolved Analysis Run 4/2/2021 12:07 PM



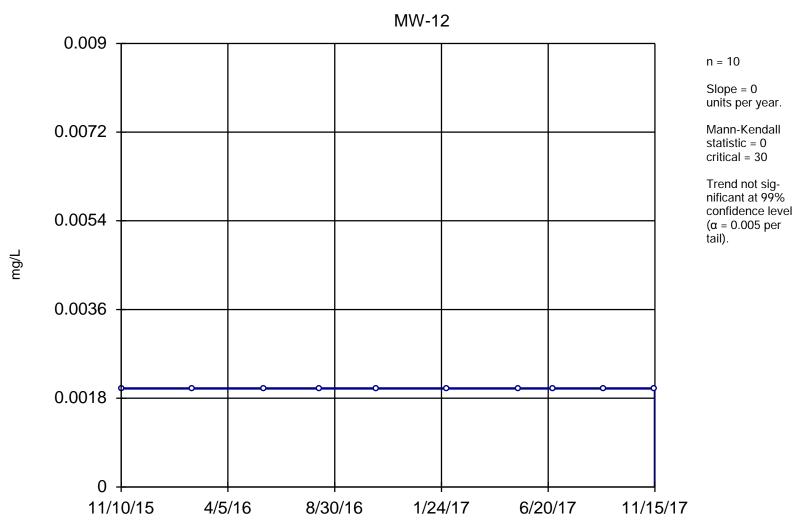
Constituent: Thallium, Total Analysis Run 4/2/2021 12:07 PM



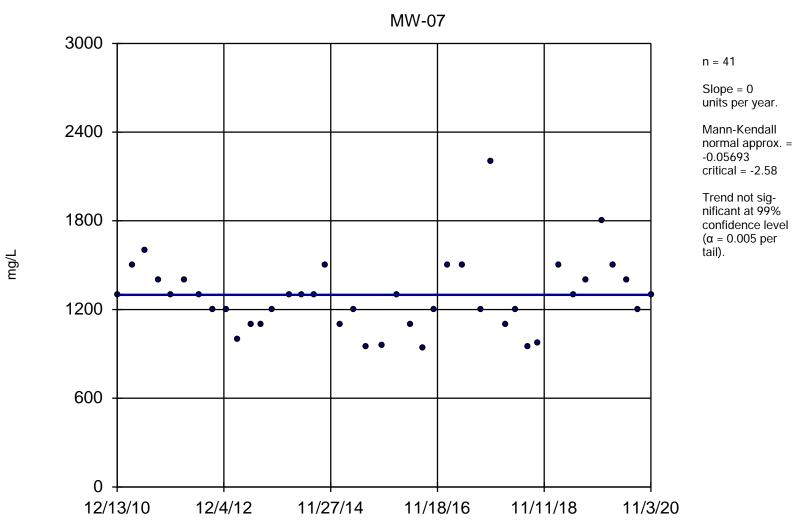
Constituent: Thallium, Total Analysis Run 4/2/2021 12:07 PM

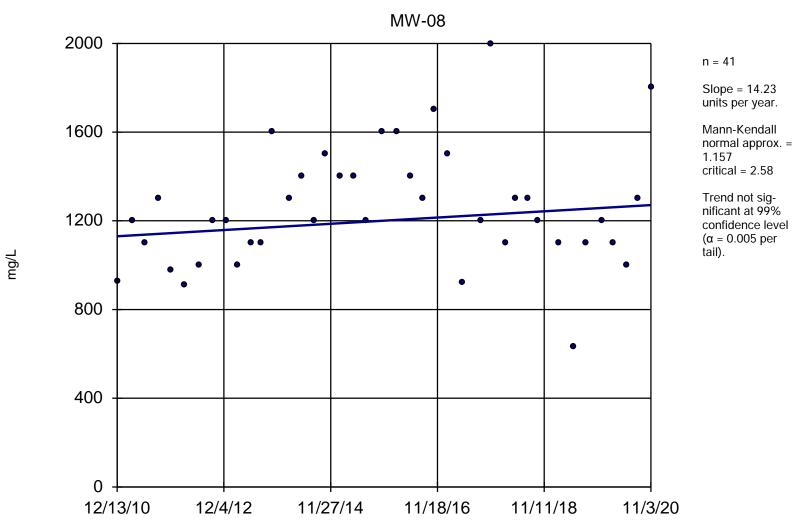


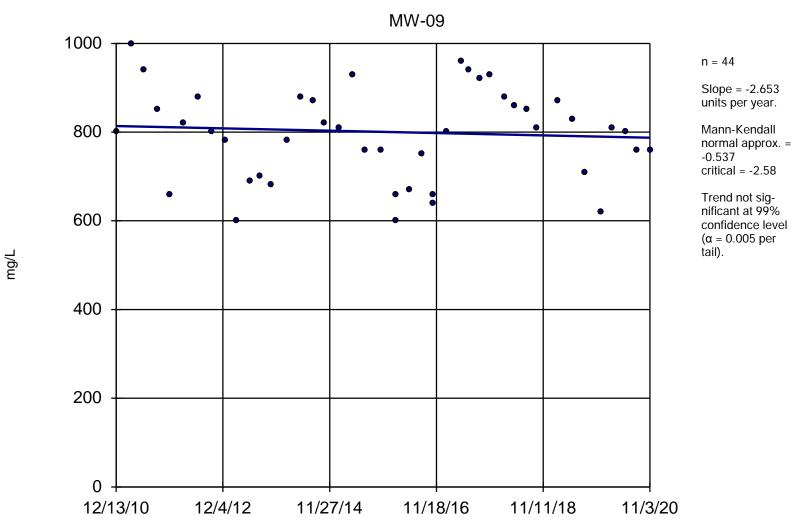
Constituent: Thallium, Total Analysis Run 4/2/2021 12:07 PM

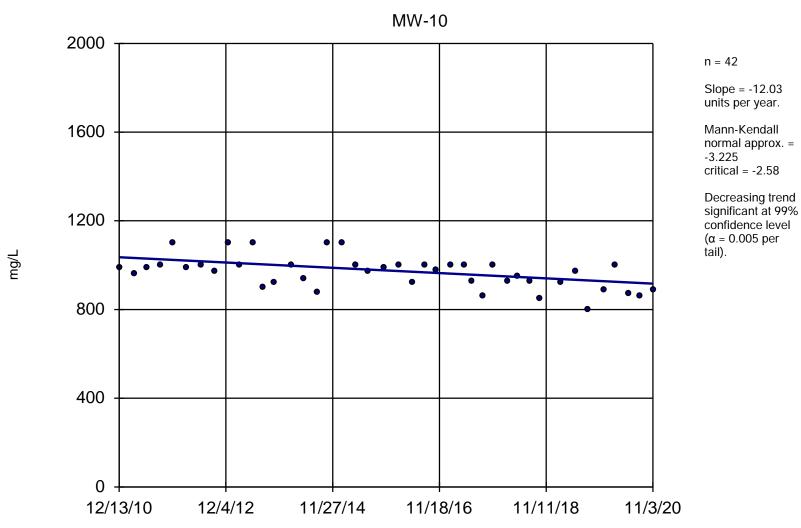


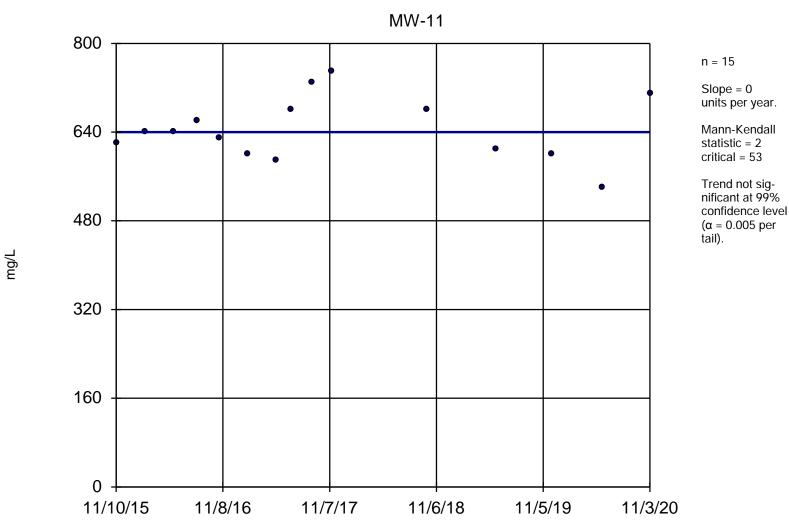
Constituent: Thallium, Total Analysis Run 4/2/2021 12:07 PM

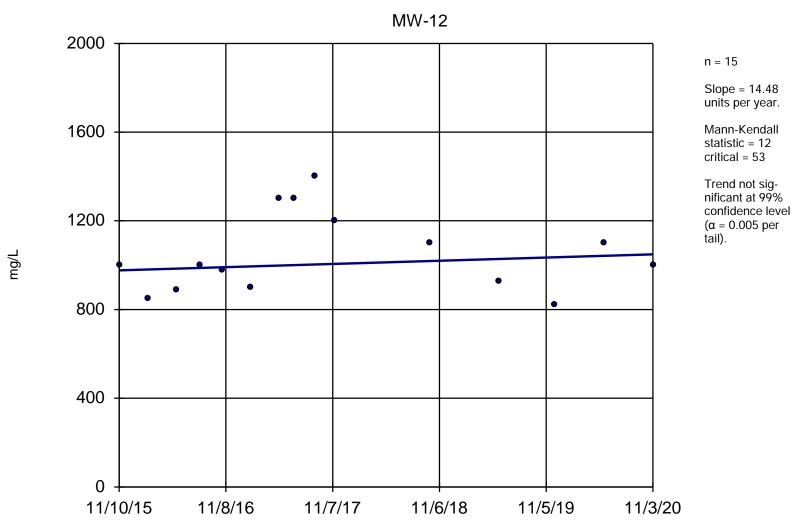










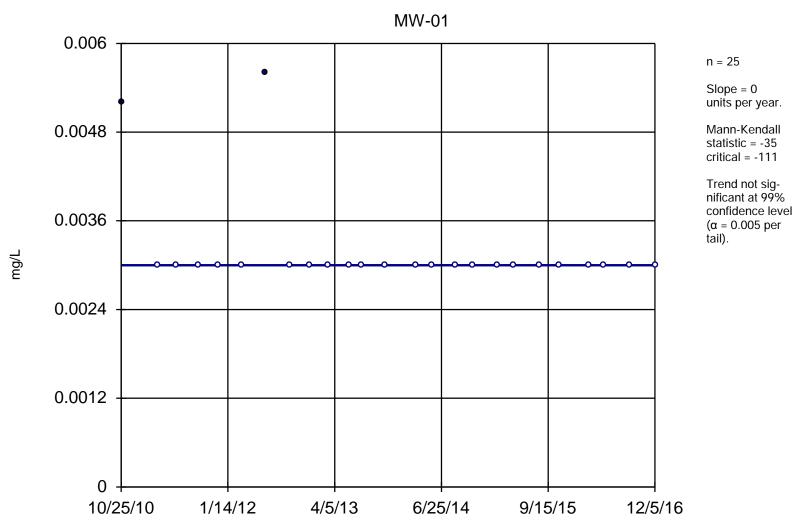


## Trend Test

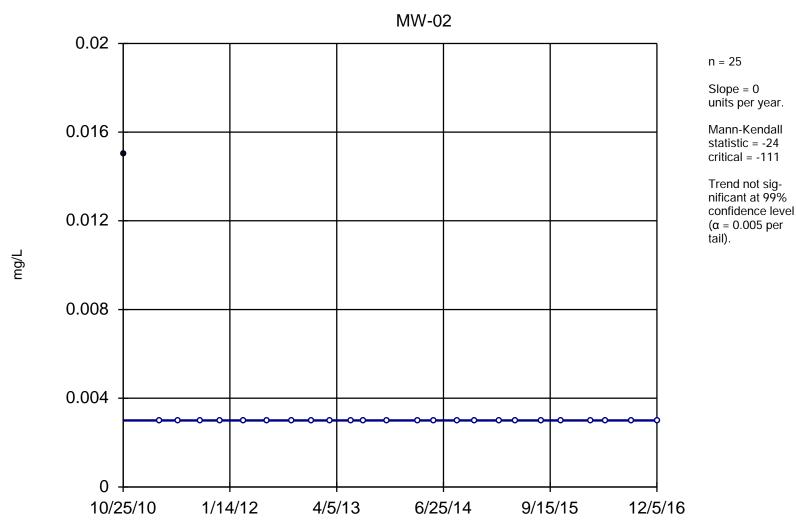
	Utility Site W	Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database Printed 4/14/2021, 1:06 PM									
Constituent	Well	Slope	Calc.	Critical	Sig.	<u>N</u>	%NDs	Normality	<u>Xform</u>	<u>Alpha</u>	Method
Antimony, Dissolved (mg/L)	MW-01	0	-35	-111	No	25	92	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-02	0	-24	-111	No	25	96	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-03	0	-24	-111	No	25	96	n/a	n/a	0.01	NP
Antimony, Dissolved (mg/L)	MW-04	0	0	111	No	25	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-01	0	0	92	No	22	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-02	0	0	92	No	22	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-03	0	0	92	No	22	100	n/a	n/a	0.01	NP
Antimony, Total (mg/L)	MW-04	0	0	92	No	22	100	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-01	0.004007	31	111	No	25	0	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-02	-0.00	-56	-111	No	25	0	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-03	0.000	4	111	No	25	0	n/a	n/a	0.01	NP
Arsenic, Dissolved (mg/L)	MW-04	0.000	71	111	No	25	0	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-01	-0.01647	-94	-92	Yes	22	0	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-02	-0.00	-97	-92	Yes	22	0	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-03	-0.00	-21	-92	No	22	0	n/a	n/a	0.01	NP
Arsenic, Total (mg/L)	MW-04	-0.00	-38	-92	No	22	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-01	-0.00	-84	-111	No	25	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-02	0.000	22	111	No	25	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-03	0.000	50	111	No	25	0	n/a	n/a	0.01	NP
Barium, Dissolved (mg/L)	MW-04	0.000	9	111	No	25	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-01	0.004937	100	92	Yes	22	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-02	0.002744	64	92	No	22	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-03	0.00474	84	92	No	22	0	n/a	n/a	0.01	NP
Barium, Total (mg/L)	MW-04	-0.00	-42	-92	No	22	0	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-01	0	0	111	No	25	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-02	0	0	111	No	25	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-03	0	0	111	No	25	100	n/a	n/a	0.01	NP
Beryllium, Dissolved (mg/L)	MW-04	0	0	111	No	25	100	n/a	n/a	0.01	NP
Beryllium, Total (mg/L)	MW-01	0	0	92	No	22	100	n/a	n/a	0.01	NP
Beryllium, Total (mg/L)	MW-02	0	0	92	No	22	100	n/a	n/a	0.01	NP
Beryllium, Total (mg/L)	MW-03	0	0	92	No	22	100	n/a	n/a	0.01	NP
Beryllium, Total (mg/L)	MW-04	0	0	92	No	22	100	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-01	-0.1131	-117	-111	Yes	25	0	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-02	0.2228	167	111	Yes	25	0	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-03	0.06854	50	111	No	25	0	n/a	n/a	0.01	NP
Boron, Dissolved (mg/L)	MW-04	0	1	111	No	25	0	n/a	n/a	0.01	NP
Boron, Total (mg/L)	MW-01	0.09787	33	58	No	16	0	n/a	n/a	0.01	NP
Boron, Total (mg/L)	MW-02	-0.03136	-6	-58	No	16	0	n/a	n/a	0.01	NP
Boron, Total (mg/L)	MW-03	0.3447	48	58	No	16	0	n/a	n/a	0.01	NP
Boron, Total (mg/L)	MW-04	0.1715	39	58	No	16	0	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-01	0	0	111	No	25	100	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-02	0	0	111	No	25	100	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-03	0	0	111	No	25	100	n/a	n/a	0.01	NP
Cadmium, Dissolved (mg/L)	MW-04	0	0	111	No	25	100	n/a	n/a	0.01	NP
Cadmium, Total (mg/L)	MW-01	0	0	92	No	22	100	n/a	n/a	0.01	NP
Cadmium, Total (mg/L)	MW-02	0	0	92	No	22	100	n/a	n/a	0.01	NP
Cadmium, Total (mg/L)	MW-03	0	0	92	No	22	100	n/a	n/a		3-1 <b>≨</b> [⊵82035
Cadmium Total (mg/L)	M/\/-\^4	n	Λ	92	No	22	100	n/a	n/a	Λ Λ1	NP

	Utility Site W	Client: Weaver Co	nsultants Group	Data: Wau	ikegan San	itas Datab	ase Print	ed 4/14/2021, 1:	4/2021, 1:06 PM			
Constituent	Well	Slope	Calc.	Critical	Sig.	<u>N</u>	%NDs	Normality	<u>Xform</u>	<u>Alpha</u>	Method	
Calcium, Total (mg/L)	MW-03	11.85	42	58	No	16	0	n/a	n/a	0.01	NP	
Calcium, Total (mg/L)	MW-04	0	3	58	No	16	0	n/a	n/a	0.01	NP	
Chloride (mg/L)	MW-01	0.1215	0.1687	2.58	No	41	0	n/a	n/a	0.01	NP	
Chloride (mg/L)	MW-02	0	0.1353	2.58	No	41	0	n/a	n/a	0.01	NP	
Chloride (mg/L)	MW-03	-2.053	-1.225	-2.58	No	41	0	n/a	n/a	0.01	NP	
Chloride (mg/L)	MW-04	-1.93	-2.26	-2.58	No	41	0	n/a	n/a	0.01	NP	
Chromium, Dissolved (mg/L)	MW-01	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Chromium, Dissolved (mg/L)	MW-02	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Chromium, Dissolved (mg/L)	MW-03	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Chromium, Dissolved (mg/L)	MW-04	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Chromium, Total (mg/L)	MW-01	0	0	92	No	22	100	n/a	n/a	0.01	NP	
Chromium, Total (mg/L)	MW-02	0	0	92	No	22	100	n/a	n/a	0.01	NP	
Chromium, Total (mg/L)	MW-03	0	0	92	No	22	100	n/a	n/a	0.01	NP	
Chromium, Total (mg/L)	MW-04	0	0	92	No	22	100	n/a	n/a	0.01	NP	
Cobalt, Dissolved (mg/L)	MW-01	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Cobalt, Dissolved (mg/L)	MW-02	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Cobalt, Dissolved (mg/L)	MW-03	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Cobalt, Dissolved (mg/L)	MW-04	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Cobalt, Total (mg/L)	MW-01	0	0	92	No	22	100	n/a	n/a	0.01	NP	
Cobalt, Total (mg/L)	MW-02	0	0	92	No	22	100	n/a	n/a	0.01	NP	
Cobalt, Total (mg/L)	MW-03	0	0	92	No	22	100	n/a	n/a	0.01	NP	
Cobalt, Total (mg/L)	MW-04	0	4	92	No	22	86.36	n/a	n/a	0.01	NP	
Fluoride (mg/L)	MW-01	-0.03192	-5.049	-2.58	Yes	41	2.439	n/a	n/a	0.01	NP	
Fluoride (mg/L)	MW-02	0	0.08998	2.58	No	41	0	n/a	n/a	0.01	NP	
Fluoride (mg/L)	MW-03	-0.03942	-2.99	-2.58	Yes	41	0	n/a	n/a	0.01	NP	
Fluoride (mg/L)	MW-04	-0.01311	-0.8769	-2.58	No	41	0	n/a	n/a	0.01	NP	
Lead, Dissolved (mg/L)	MW-01	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Lead, Dissolved (mg/L)	MW-02	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Lead, Dissolved (mg/L)	MW-03	0	8	111	No	25	96	n/a	n/a	0.01	NP	
Lead, Dissolved (mg/L)	MW-04	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Lead, Total (mg/L)	MW-01	0	1	92	No	22	95.45	n/a	n/a	0.01	NP	
Lead, Total (mg/L)	MW-02	0	0	92	No	22	100	n/a	n/a	0.01	NP	
Lead, Total (mg/L)	MW-03	0	0	92	No	22	100	n/a	n/a	0.01	NP	
Lead, Total (mg/L)	MW-04	0	0	92	No	22	100	n/a	n/a	0.01	NP	
Lithium, Total (mg/L)	MW-02	0	0	34	No	11	100	n/a	n/a	0.01	NP	
Lithium, Total (mg/L)	MW-03	0	0	34	No	11	100	n/a	n/a	0.01	NP	
Lithium, Total (mg/L)	MW-04	0	0	34	No	11	100	n/a	n/a	0.01	NP	
Mercury, Dissolved (mg/L)	MW-01	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Mercury, Dissolved (mg/L)	MW-02	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Mercury, Dissolved (mg/L)	MW-03	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Mercury, Dissolved (mg/L)	MW-04	0	0	111	No	25	100	n/a	n/a	0.01	NP	
Mercury, Total (mg/L)	MW-01	0	0	92	No	22	100	n/a	n/a	0.01	NP	
Mercury, Total (mg/L)	MW-02	0	0	92	No	22	100	n/a	n/a	0.01	NP	
Mercury, Total (mg/L)	MW-03	0	0	92	No	22	100	n/a	n/a	0.01	NP	
Mercury, Total (mg/L)	MW-04	0	-3	-92	No	22	95.45	n/a	n/a	0.01	NP	
Molybdenum, Total (mg/L)	MW-01	-0.00	-15	-34	No	11	0	n/a	n/a	0.01	NP	
Molybdenum, Total (mg/L)	MW-02	-0.00	-21	-34	No	11	0	n/a	n/a	<sub>0.0</sub> MWG13		
Molyhdenum Total (ma/l.)	W/V/-U3	Ი ᲘᲘᲕᲜঀ1	11	34	No	11	Λ	n/a	n/a	0.01	NP	

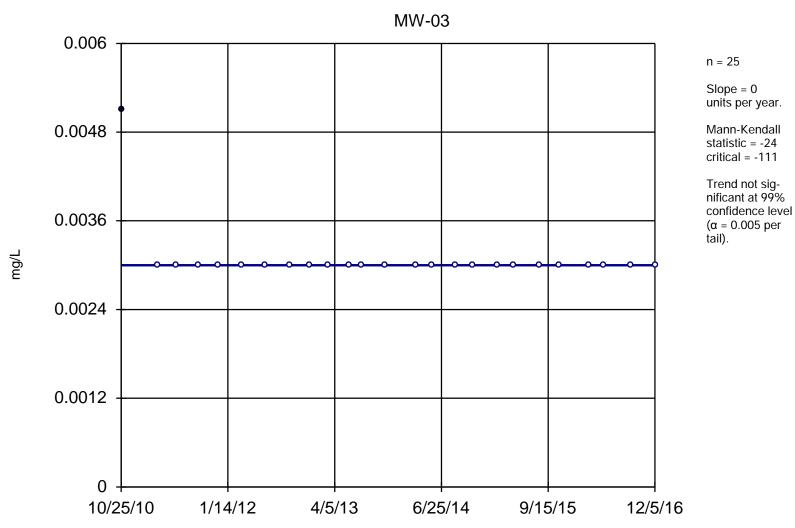
	Utility Site W	Client: Weaver Co	nsultants Group	Data: Wauk	egan San	itas Databa	se Printe	ed 4/14/2021, 1:	06 PM		
Constituent	<u>Well</u>	Slope	Calc.	Critical	Sig.	<u>N</u>	%NDs	Normality	<u>Xform</u>	<u>Alpha</u>	Method
pH, Field (Standard Units)	MW-02	-0.06572	-1.696	-2.58	No	41	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-03	-0.1512	-3.168	-2.58	Yes	41	0	n/a	n/a	0.01	NP
pH, Field (Standard Units)	MW-04	-0.07213	-3.091	-2.58	Yes	41	0	n/a	n/a	0.01	NP
Radium-226 (pCi/L)	MW-01	0	7	58	No	16	62.5	n/a	n/a	0.01	NP
Radium-226 (pCi/L)	MW-02	0	3	58	No	16	62.5	n/a	n/a	0.01	NP
Radium-226 (pCi/L)	MW-03	0	9	58	No	16	62.5	n/a	n/a	0.01	NP
Radium-228 (pCi/L)	MW-01	0	-9	-58	No	16	93.75	n/a	n/a	0.01	NP
Radium-228 (pCi/L)	MW-02	0	-16	-58	No	16	75	n/a	n/a	0.01	NP
Radium-228 (pCi/L)	MW-03	0	-4	-58	No	16	75	n/a	n/a	0.01	NP
Radium-228 (pCi/L)	MW-04	-0.00	-32	-58	No	16	50	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-01	-0.00	-84	-111	No	25	16	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-02	-0.00	-112	-111	Yes	25	44	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-03	-0.00	-122	-111	Yes	25	28	n/a	n/a	0.01	NP
Selenium, Dissolved (mg/L)	MW-04	-0.00027	-86	-111	No	25	52	n/a	n/a	0.01	NP
Selenium, Total (mg/L)	MW-01	-1.4e-11	-43	-92	No	22	50	n/a	n/a	0.01	NP
Selenium, Total (mg/L)	MW-02	0	1	92	No	22	54.55	n/a	n/a	0.01	NP
Selenium, Total (mg/L)	MW-03	0.000	67	92	No	22	36.36	n/a	n/a	0.01	NP
Selenium, Total (mg/L)	MW-04	0	-3	-92	No	22	22.73	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-01	6.09	1.5	2.58	No	41	7.317	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-02	9.876	2.346	2.58	No	41	7.317	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-03	16.66	4.033	2.58	Yes	41	7.317	n/a	n/a	0.01	NP
Sulfate (mg/L)	MW-04	12.94	2.206	2.58	No	41	7.317	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-01	0	0	111	No	25	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-02	0	0	111	No	25	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-03	0	0	111	No	25	100	n/a	n/a	0.01	NP
Thallium, Dissolved (mg/L)	MW-04	0	0	111	No	25	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-01	0	0	92	No	22	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-02	0	0	92	No	22	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-03	0	0	92	No	22	100	n/a	n/a	0.01	NP
Thallium, Total (mg/L)	MW-04	0	0	92	No	22	100	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-01	5.458	1.138	2.58	No	41	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-02	15.76	2.778	2.58	Yes	41	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-03	34.41	4.97	2.58	Yes	41	0	n/a	n/a	0.01	NP
Total Dissolved Solids (mg/L)	MW-04	32.68	3.417	2.58	Yes	41	0	n/a	n/a	0.01	NP



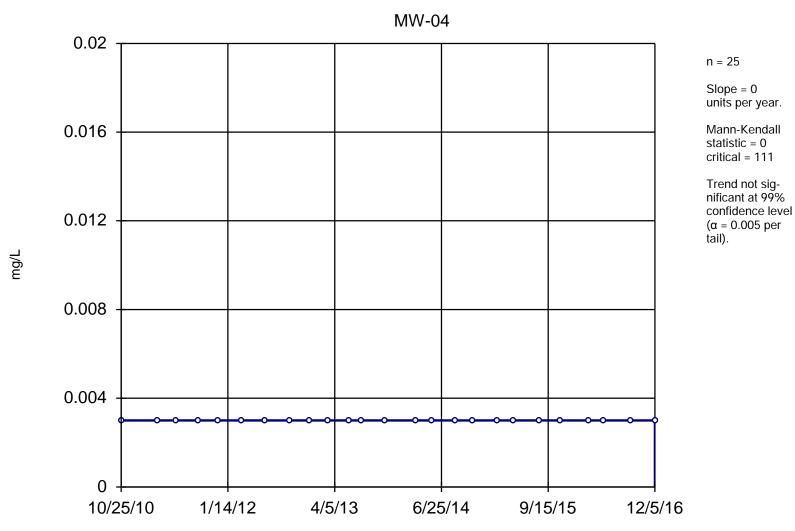
Constituent: Antimony, Dissolved Analysis Run 4/14/2021 1:00 PM



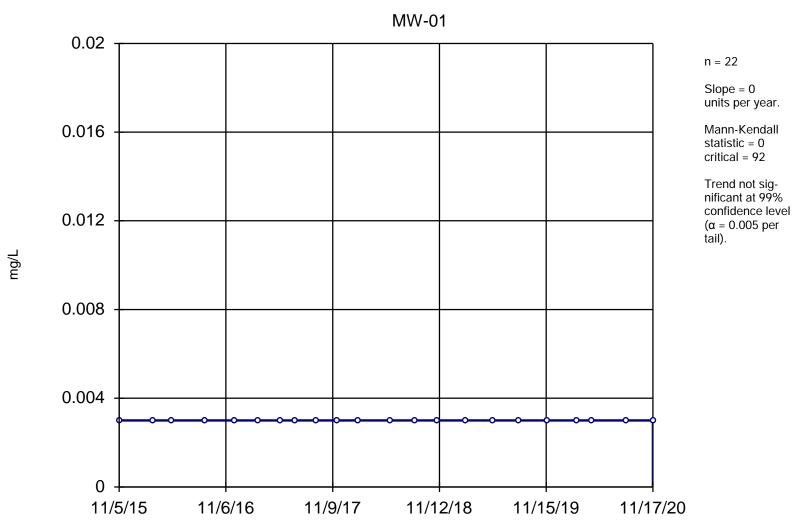
Constituent: Antimony, Dissolved Analysis Run 4/14/2021 1:00 PM



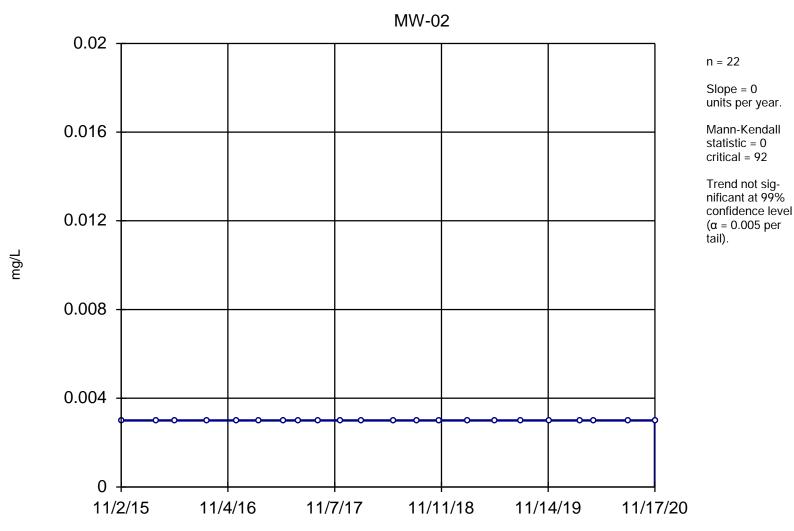
Constituent: Antimony, Dissolved Analysis Run 4/14/2021 1:00 PM
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database



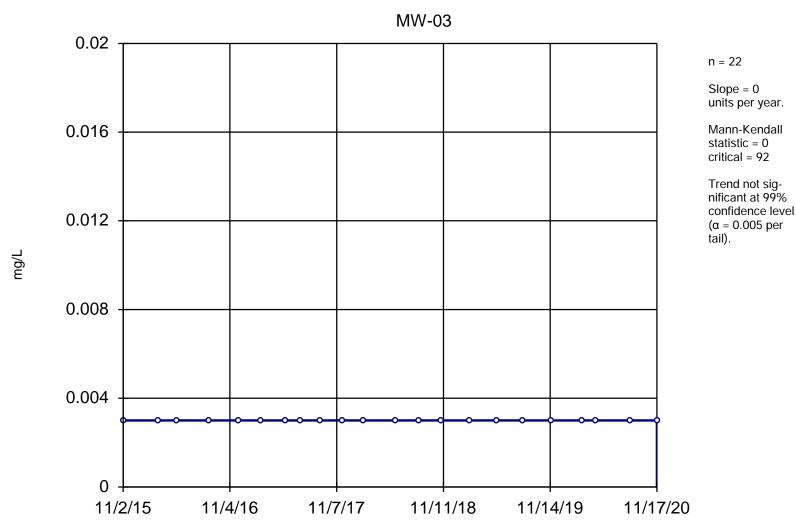
Constituent: Antimony, Dissolved Analysis Run 4/14/2021 1:00 PM
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database



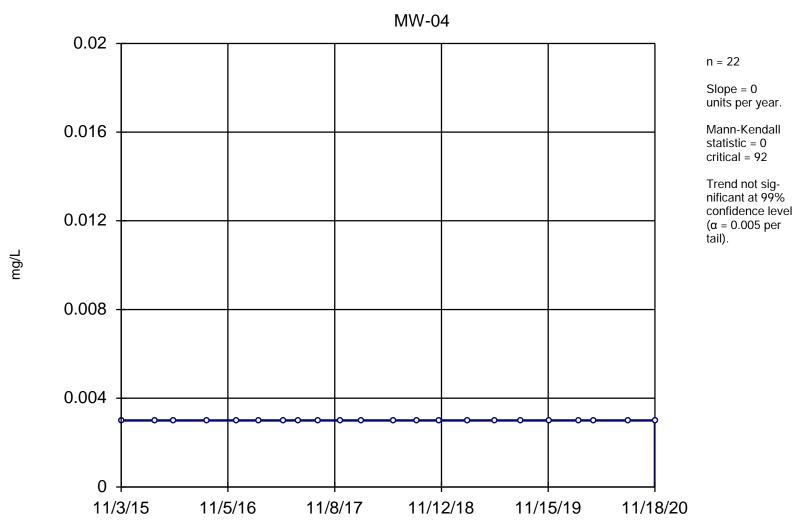
Constituent: Antimony, Total Analysis Run 4/14/2021 1:00 PM



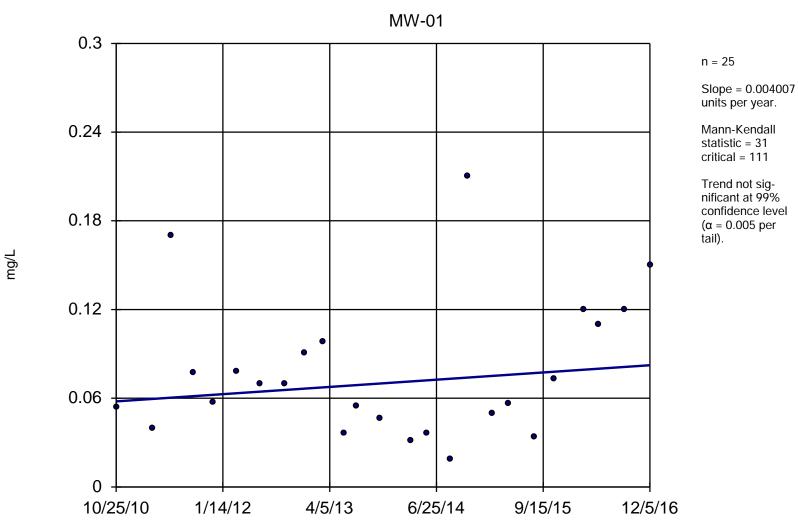
Constituent: Antimony, Total Analysis Run 4/14/2021 1:00 PM



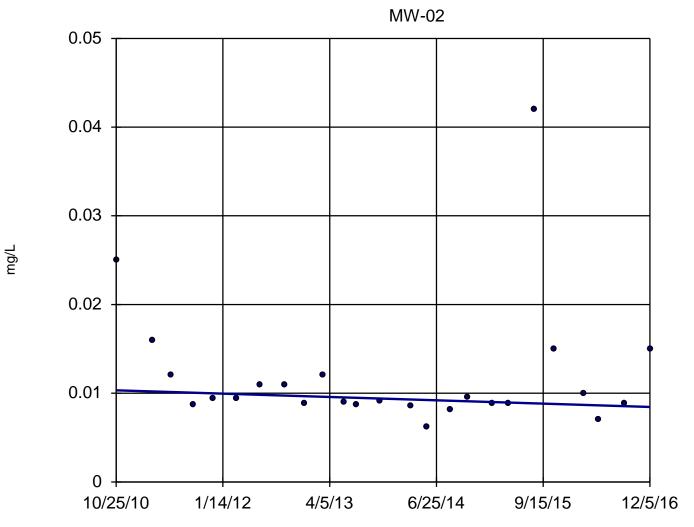
Constituent: Antimony, Total Analysis Run 4/14/2021 1:01 PM



Constituent: Antimony, Total Analysis Run 4/14/2021 1:01 PM



Constituent: Arsenic, Dissolved Analysis Run 4/14/2021 1:01 PM



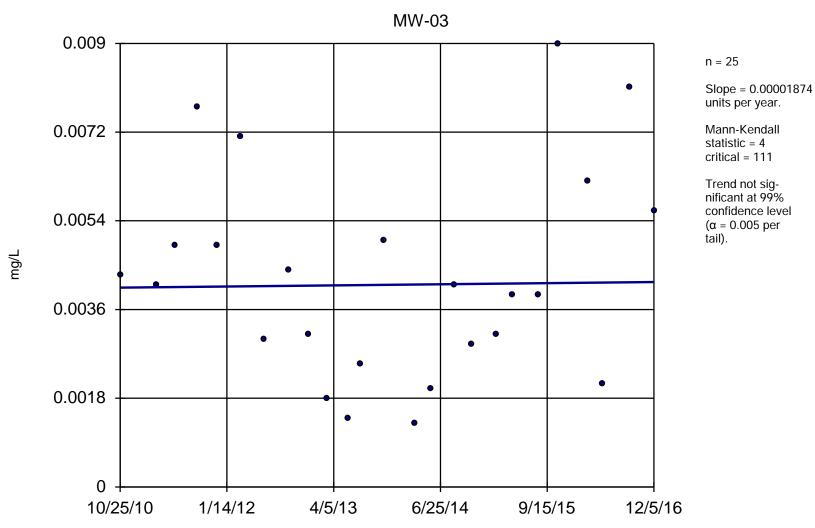
n = 25

Slope = -0.0003061 units per year.

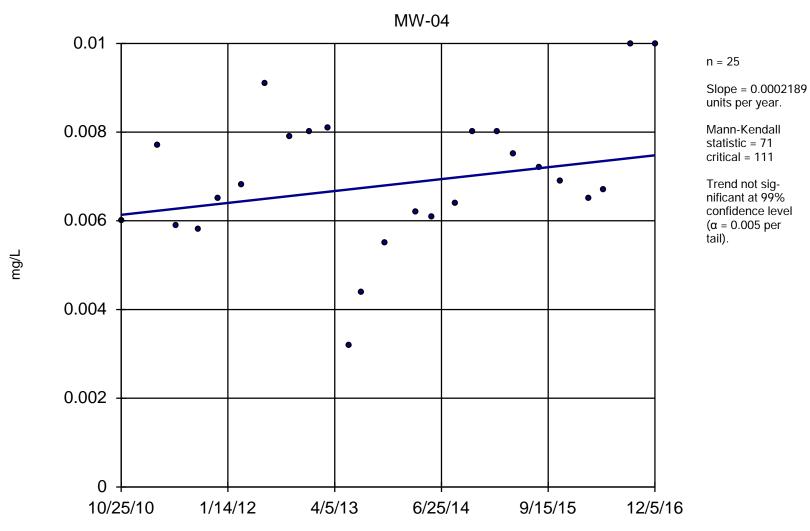
Mann-Kendall statistic = -56 critical = -111

Trend not significant at 99% confidence level ( $\alpha = 0.005$  per tail).

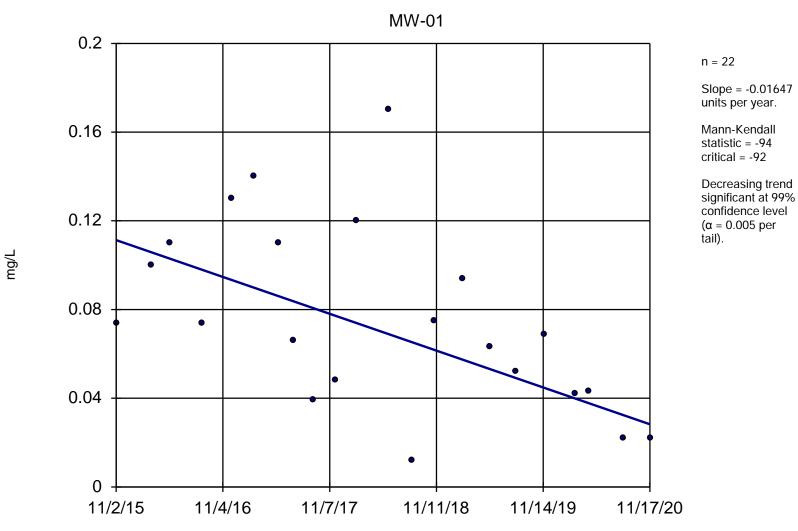
Constituent: Arsenic, Dissolved Analysis Run 4/14/2021 1:01 PM



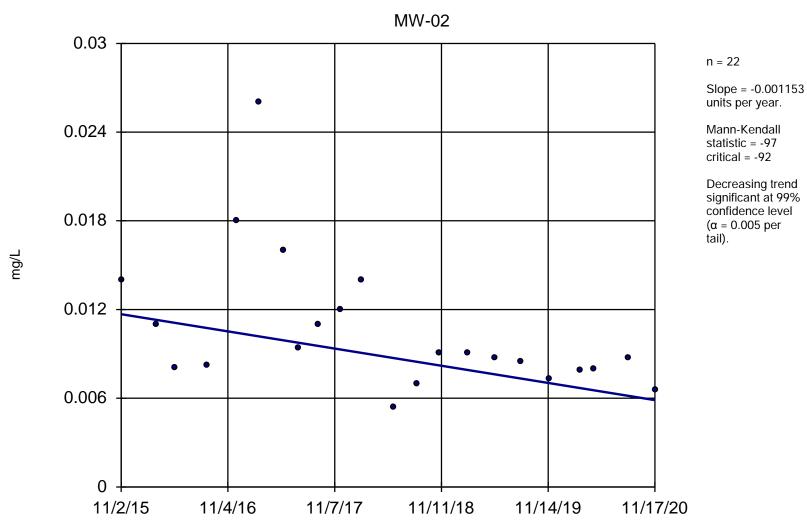
Constituent: Arsenic, Dissolved Analysis Run 4/14/2021 1:01 PM



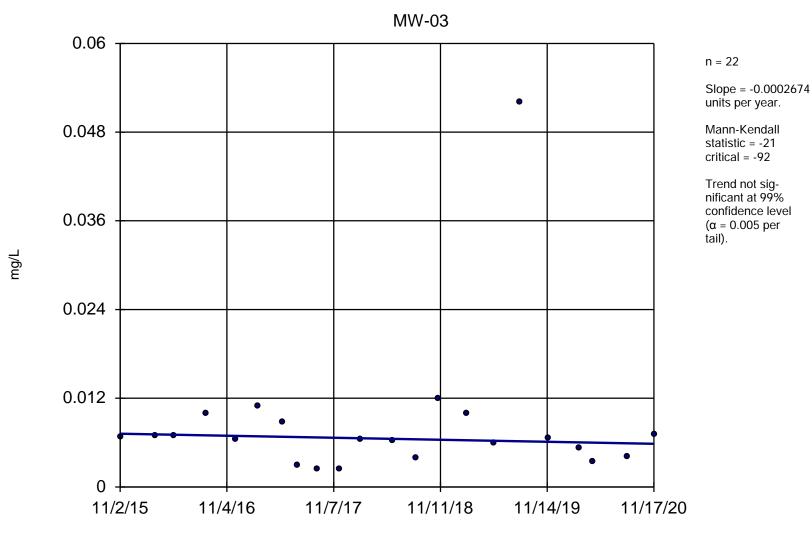
Constituent: Arsenic, Dissolved Analysis Run 4/14/2021 1:01 PM



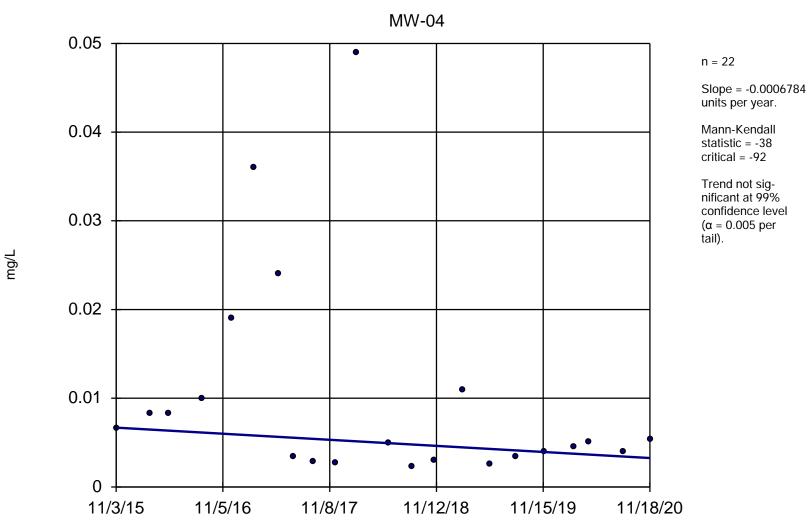
Constituent: Arsenic, Total Analysis Run 4/14/2021 1:01 PM



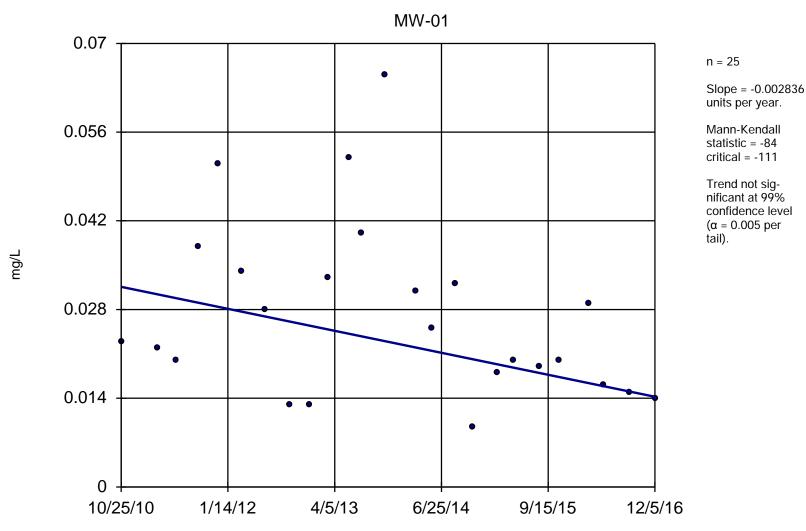
Constituent: Arsenic, Total Analysis Run 4/14/2021 1:01 PM



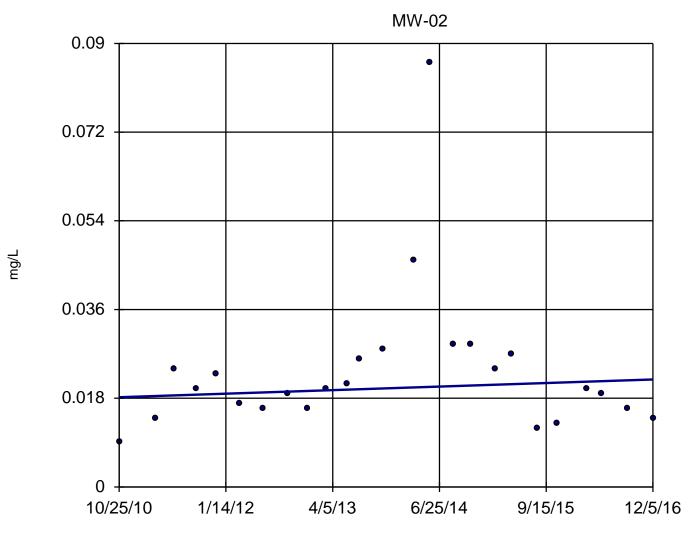
Constituent: Arsenic, Total Analysis Run 4/14/2021 1:01 PM



Constituent: Arsenic, Total Analysis Run 4/14/2021 1:01 PM



Constituent: Barium, Dissolved Analysis Run 4/14/2021 1:01 PM



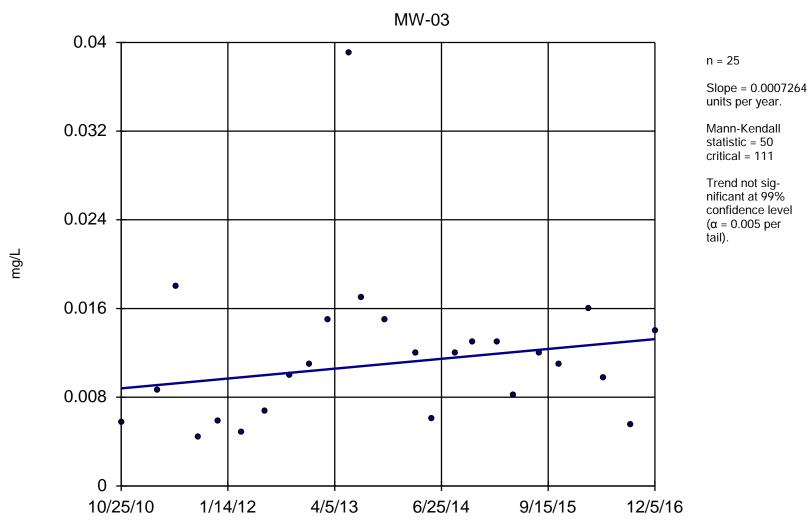
n = 25

Slope = 0.0005904 units per year.

Mann-Kendall statistic = 22 critical = 111

Trend not significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

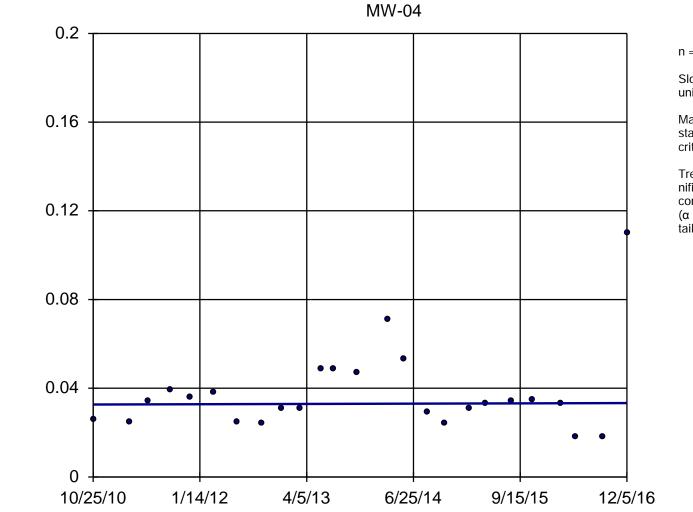
Constituent: Barium, Dissolved Analysis Run 4/14/2021 1:01 PM



Constituent: Barium, Dissolved Analysis Run 4/14/2021 1:01 PM

mg/L

### Sen's Slope Estimator



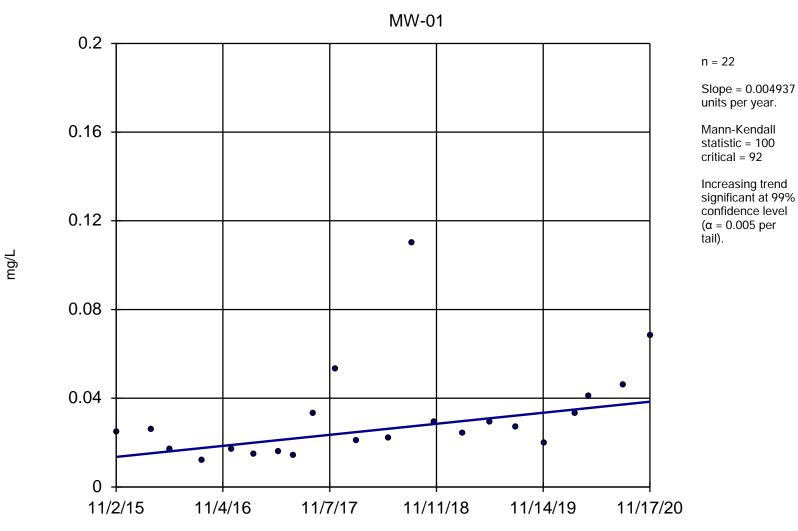
n = 25

Slope = 0.0001138 units per year.

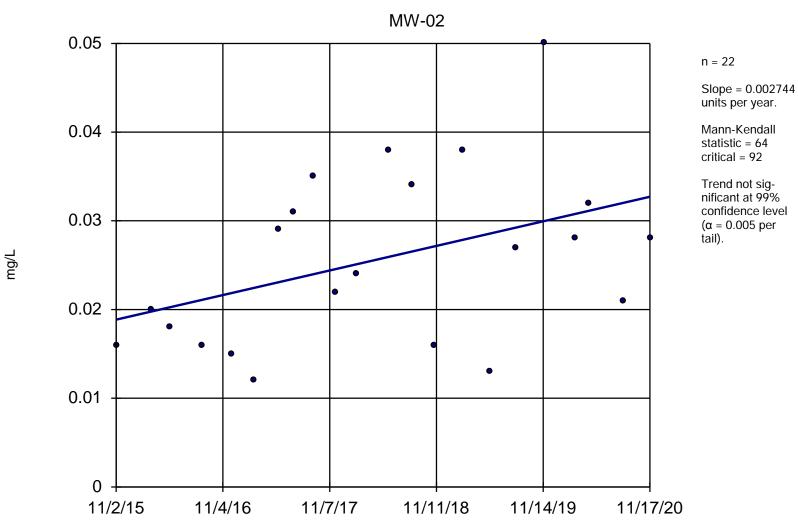
Mann-Kendall statistic = 9 critical = 111

Trend not significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

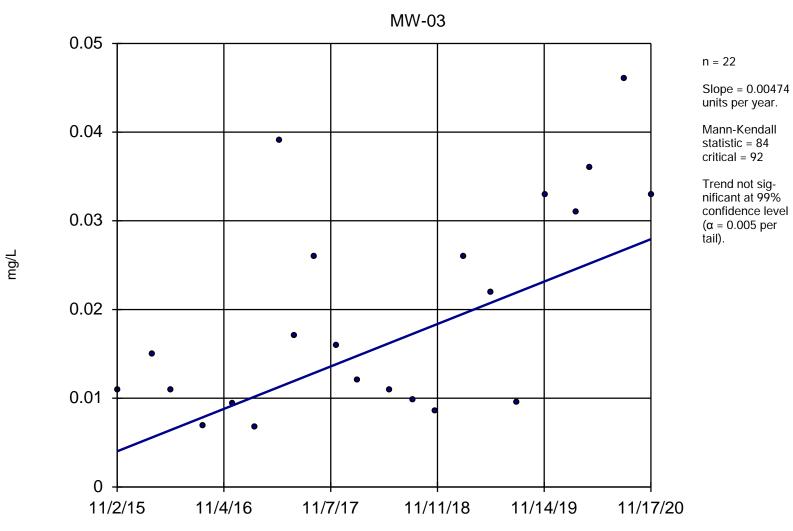
Constituent: Barium, Dissolved Analysis Run 4/14/2021 1:01 PM



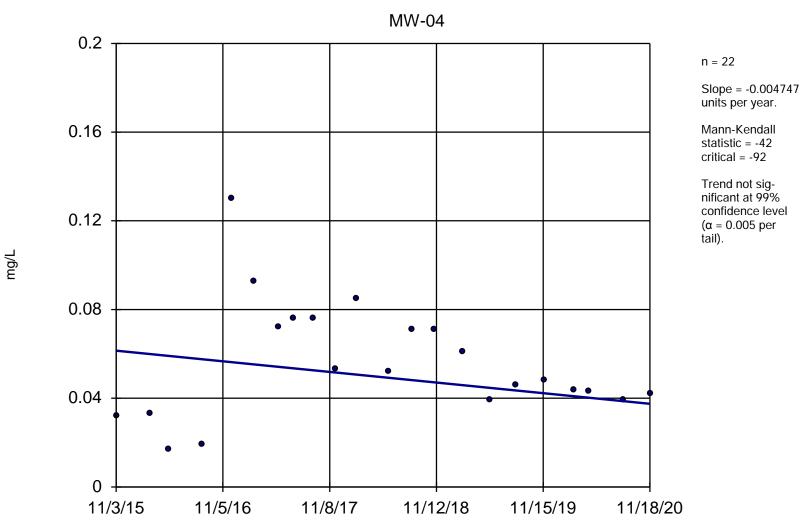
Constituent: Barium, Total Analysis Run 4/14/2021 1:01 PM



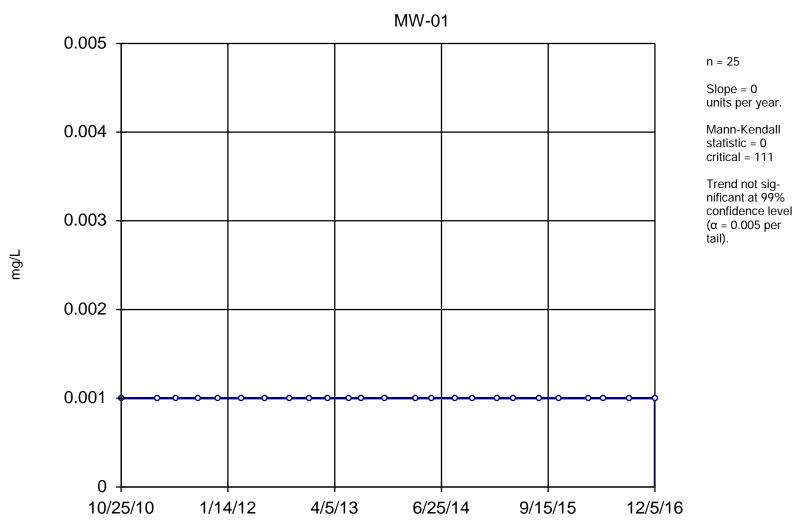
Constituent: Barium, Total Analysis Run 4/14/2021 1:01 PM



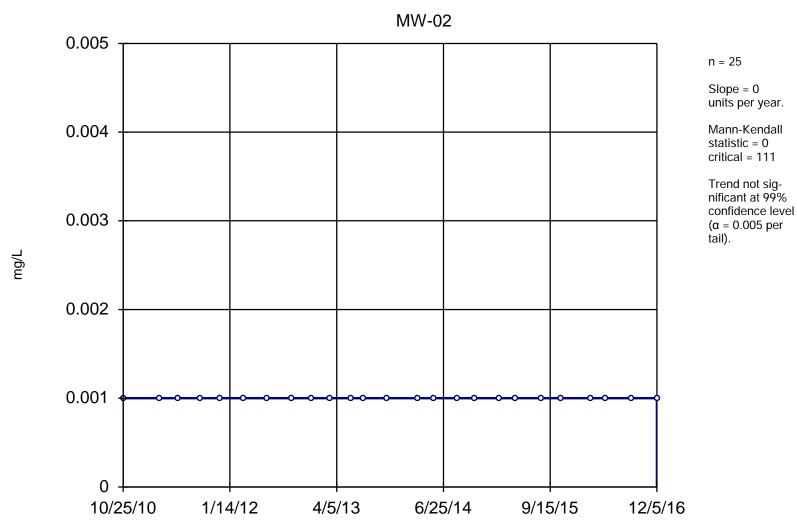
Constituent: Barium, Total Analysis Run 4/14/2021 1:01 PM



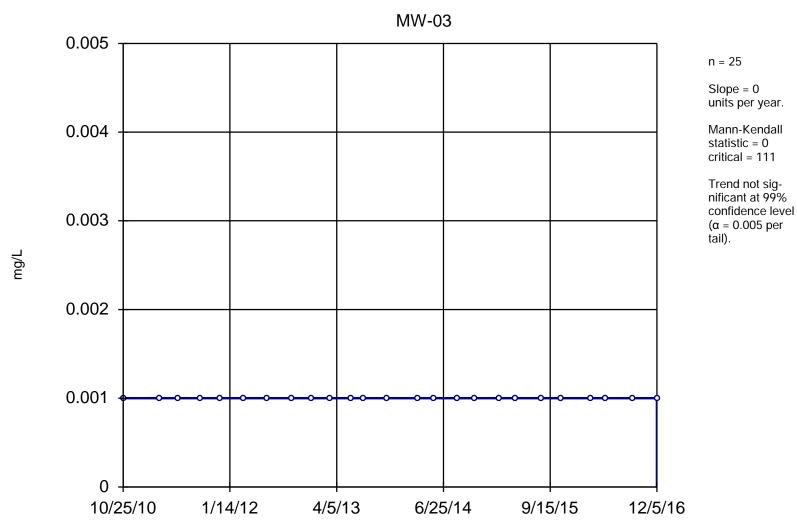
Constituent: Barium, Total Analysis Run 4/14/2021 1:01 PM



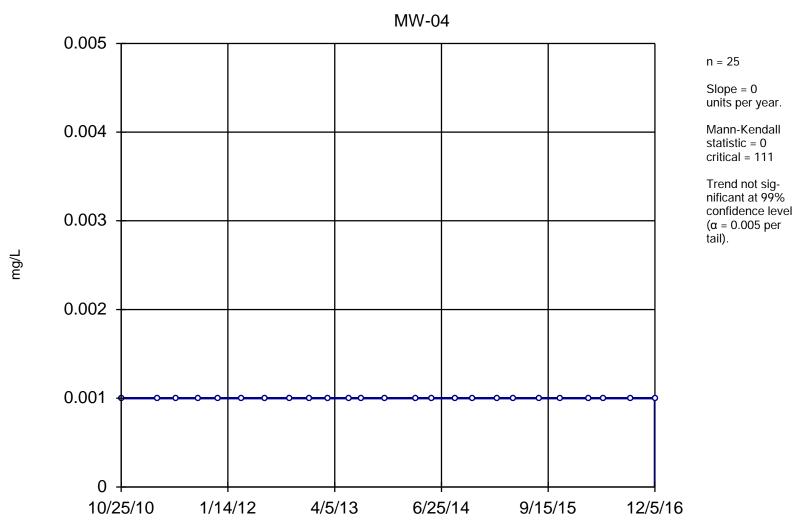
Constituent: Beryllium, Dissolved Analysis Run 4/14/2021 1:01 PM



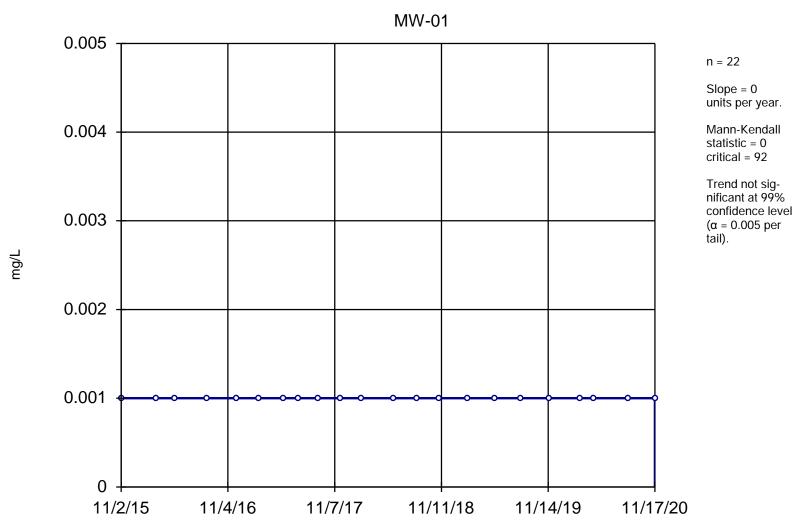
Constituent: Beryllium, Dissolved Analysis Run 4/14/2021 1:01 PM



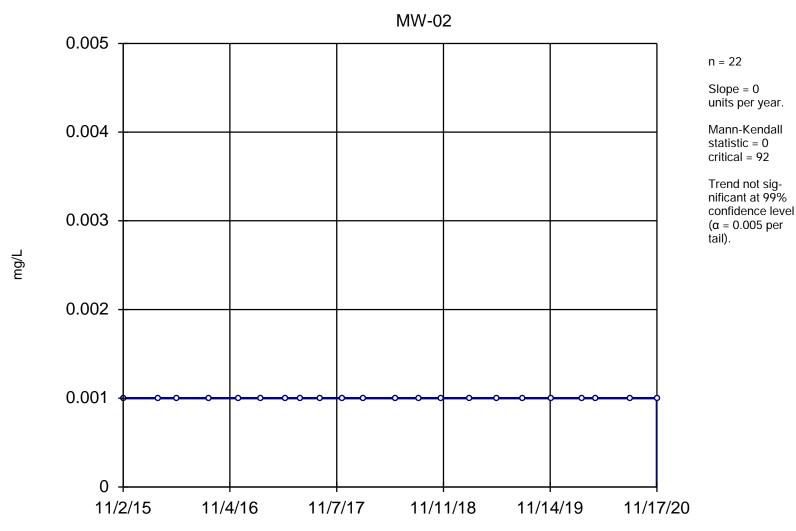
Constituent: Beryllium, Dissolved Analysis Run 4/14/2021 1:01 PM



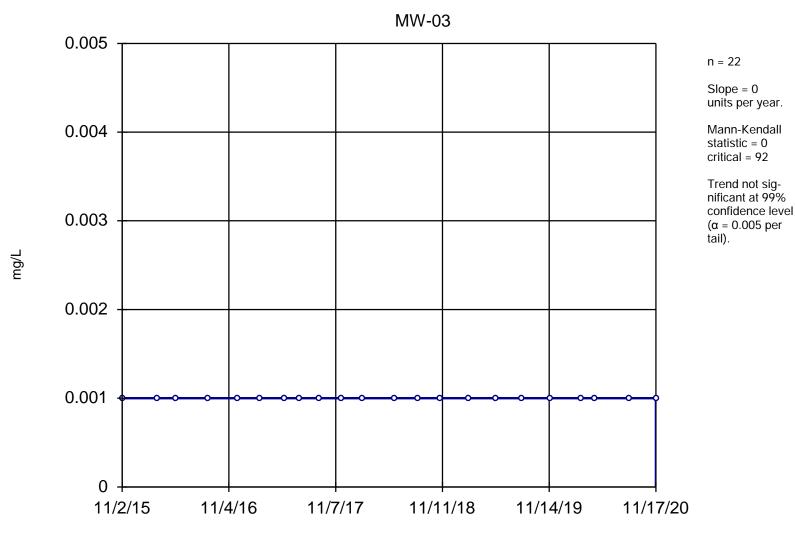
Constituent: Beryllium, Dissolved Analysis Run 4/14/2021 1:01 PM



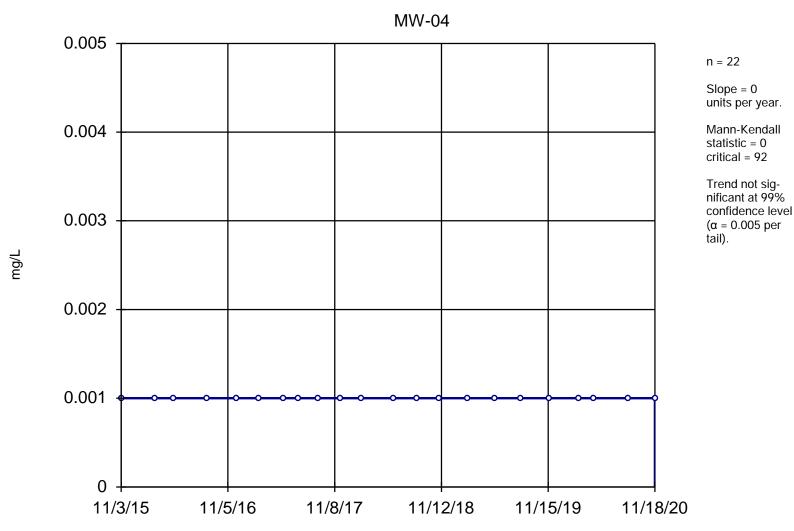
Constituent: Beryllium, Total Analysis Run 4/14/2021 1:01 PM



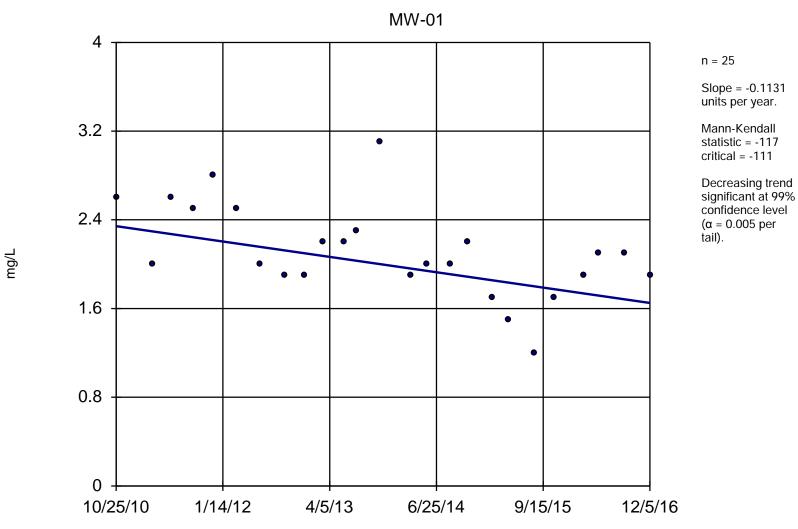
Constituent: Beryllium, Total Analysis Run 4/14/2021 1:01 PM



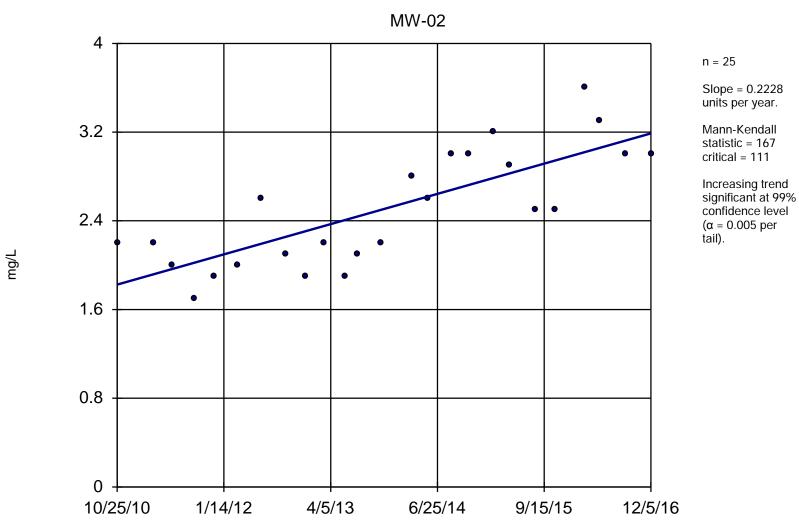
Constituent: Beryllium, Total Analysis Run 4/14/2021 1:01 PM



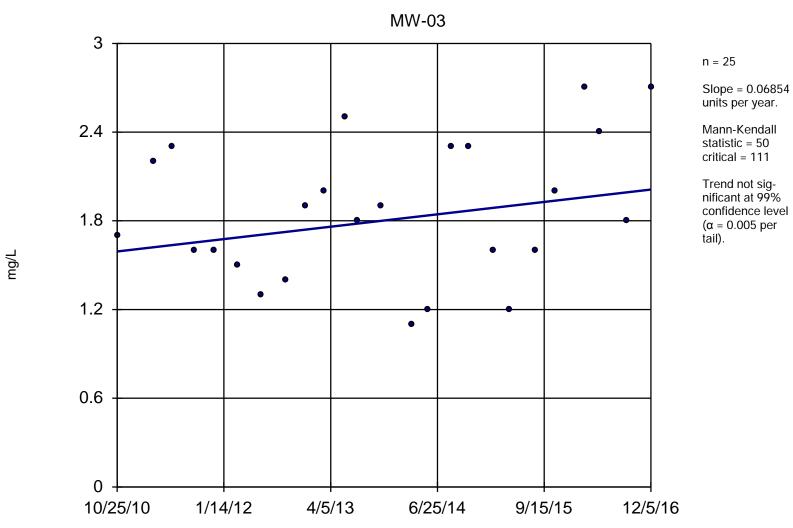
Constituent: Beryllium, Total Analysis Run 4/14/2021 1:01 PM



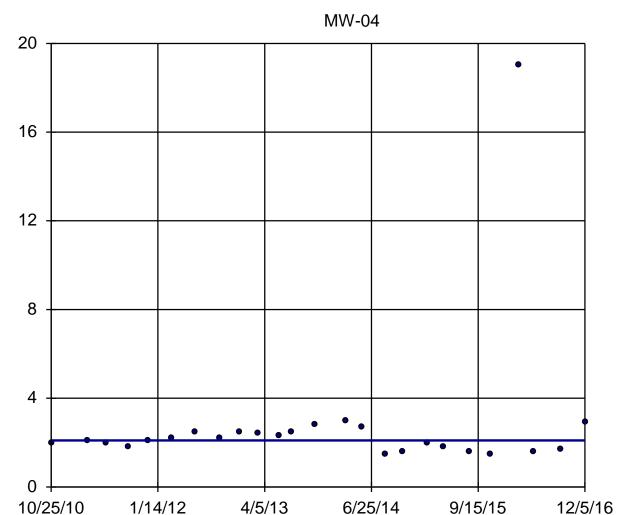
Constituent: Boron, Dissolved Analysis Run 4/14/2021 1:01 PM



Constituent: Boron, Dissolved Analysis Run 4/14/2021 1:01 PM



Constituent: Boron, Dissolved Analysis Run 4/14/2021 1:01 PM
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database



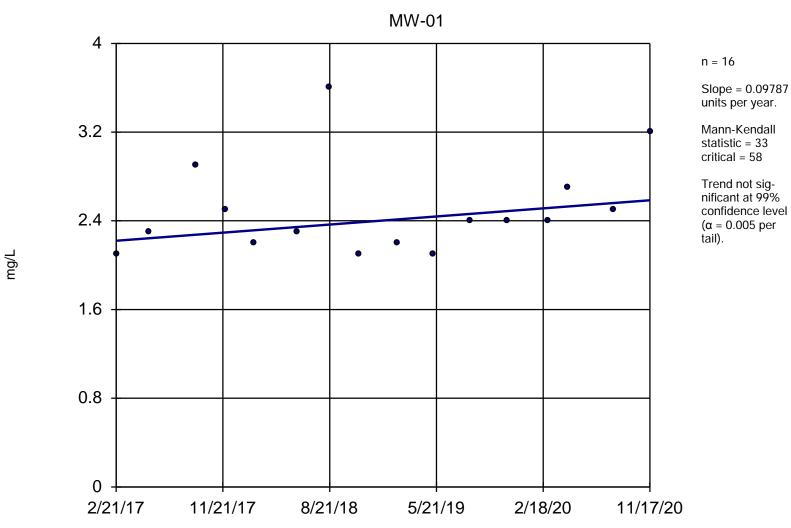
n = 25

Slope = 0 units per year.

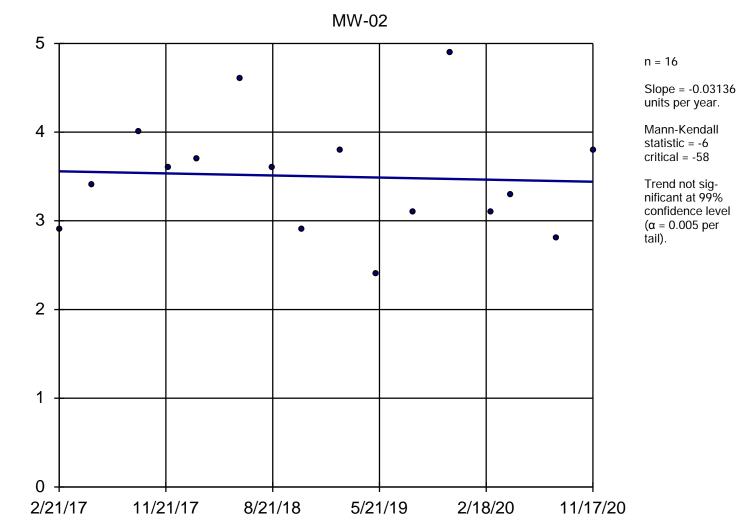
Mann-Kendall statistic = 1 critical = 111

Trend not significant at 99% confidence level  $(\alpha = 0.005 \text{ per tail})$ .

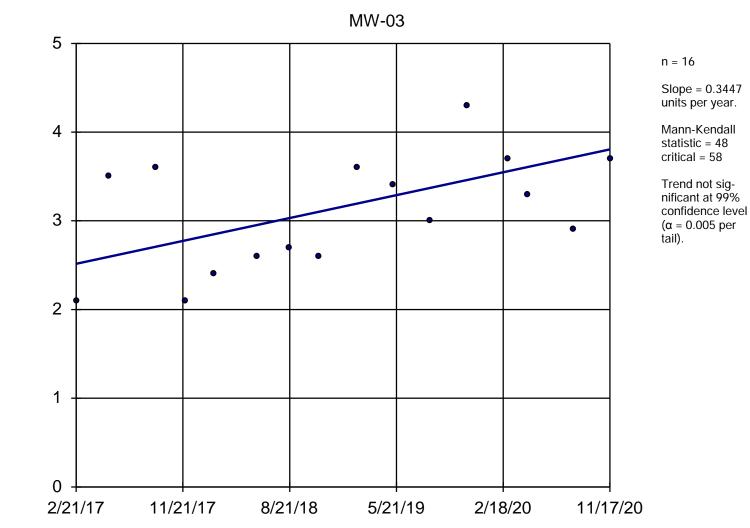
Constituent: Boron, Dissolved Analysis Run 4/14/2021 1:01 PM



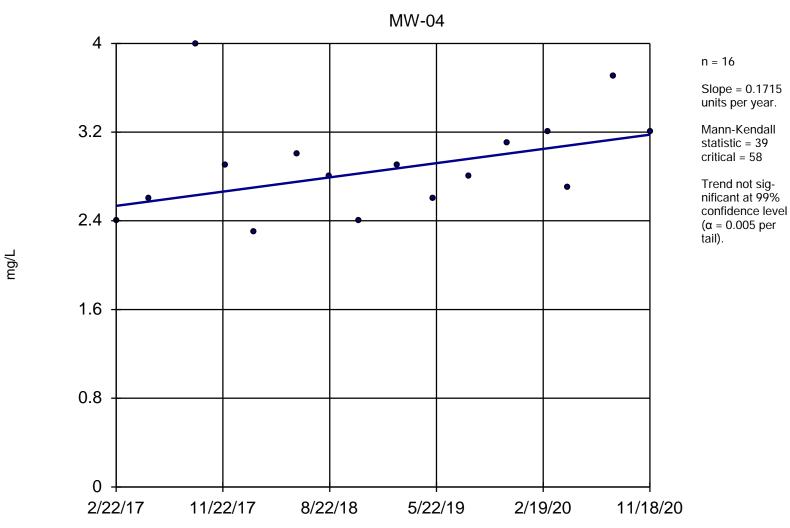
Constituent: Boron, Total Analysis Run 4/14/2021 1:01 PM



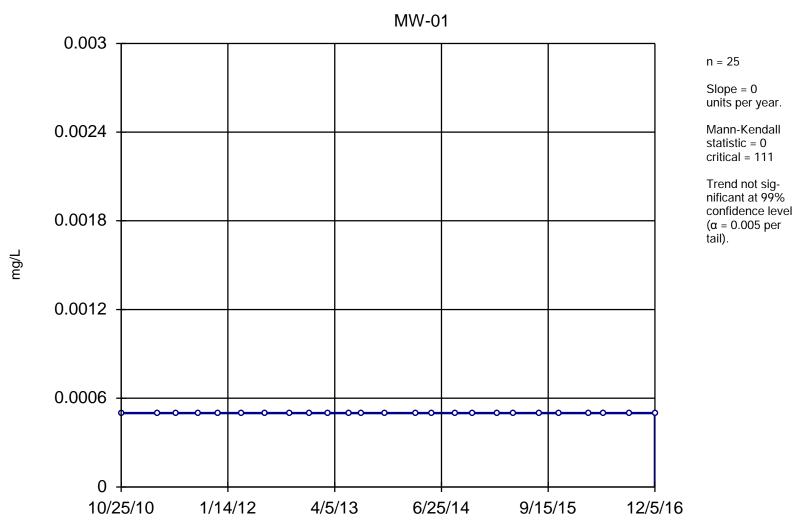
Constituent: Boron, Total Analysis Run 4/14/2021 1:01 PM



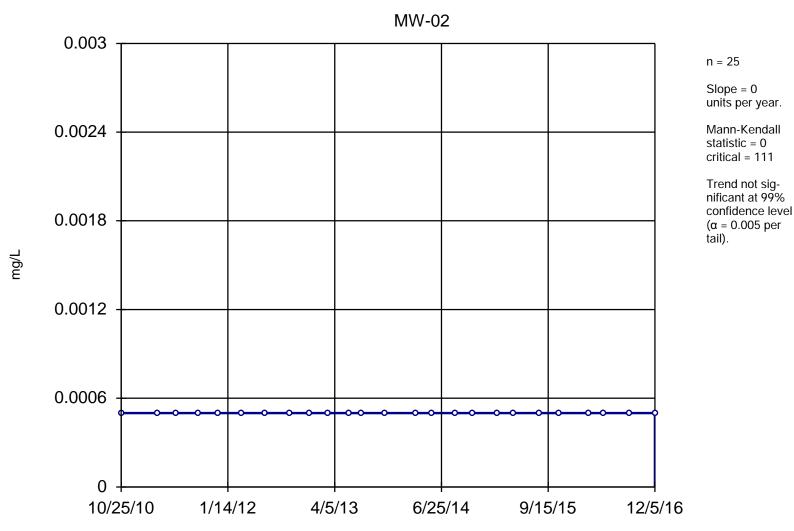
Constituent: Boron, Total Analysis Run 4/14/2021 1:01 PM



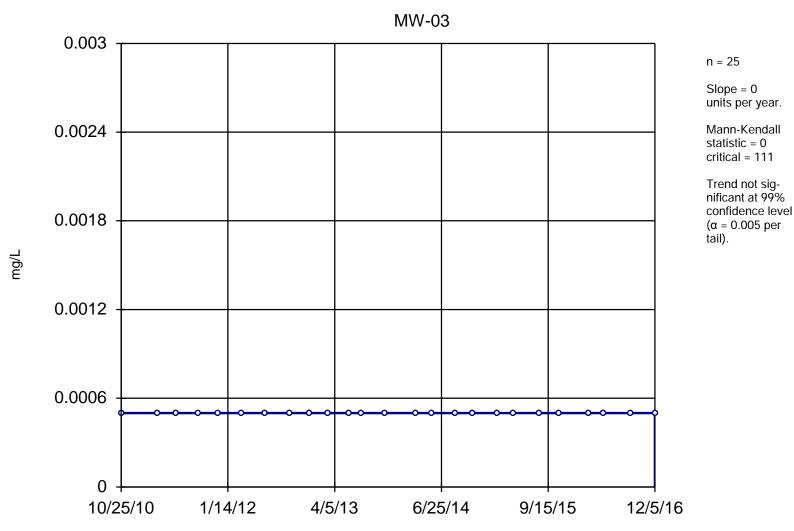
Constituent: Boron, Total Analysis Run 4/14/2021 1:01 PM



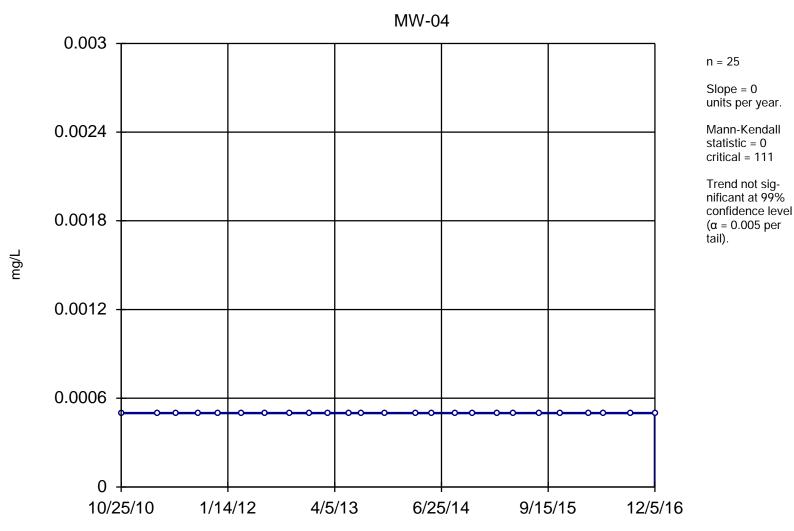
Constituent: Cadmium, Dissolved Analysis Run 4/14/2021 1:01 PM



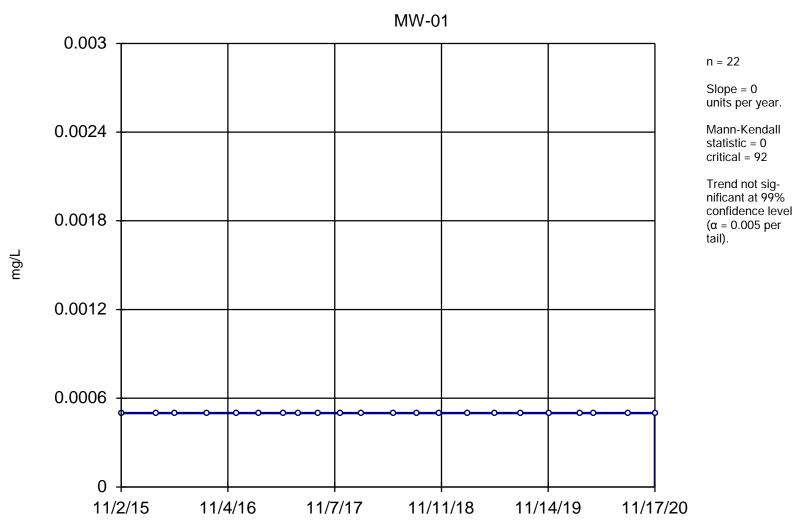
Constituent: Cadmium, Dissolved Analysis Run 4/14/2021 1:01 PM



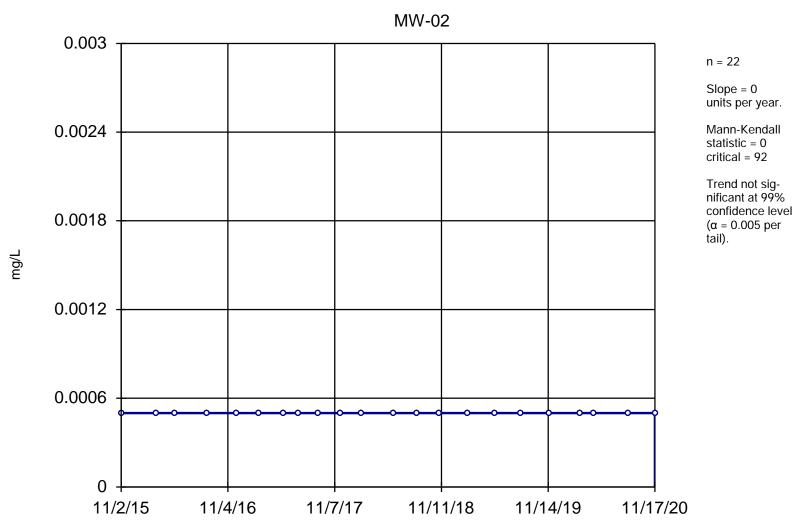
Constituent: Cadmium, Dissolved Analysis Run 4/14/2021 1:01 PM



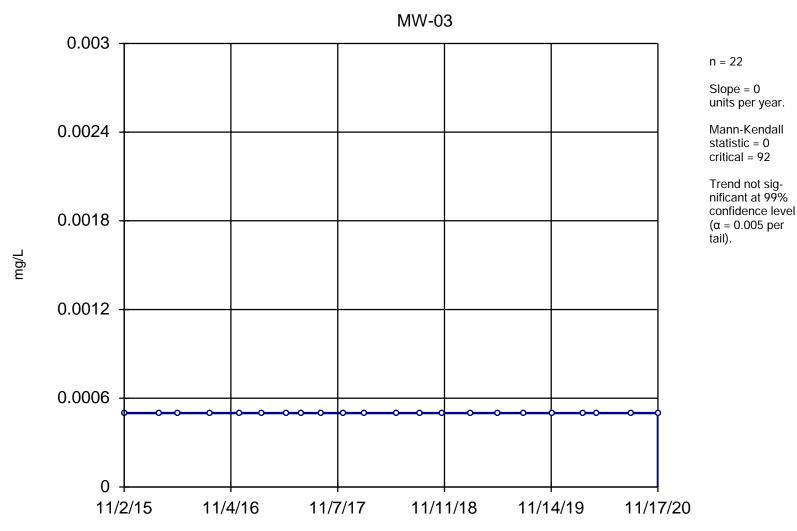
Constituent: Cadmium, Dissolved Analysis Run 4/14/2021 1:01 PM



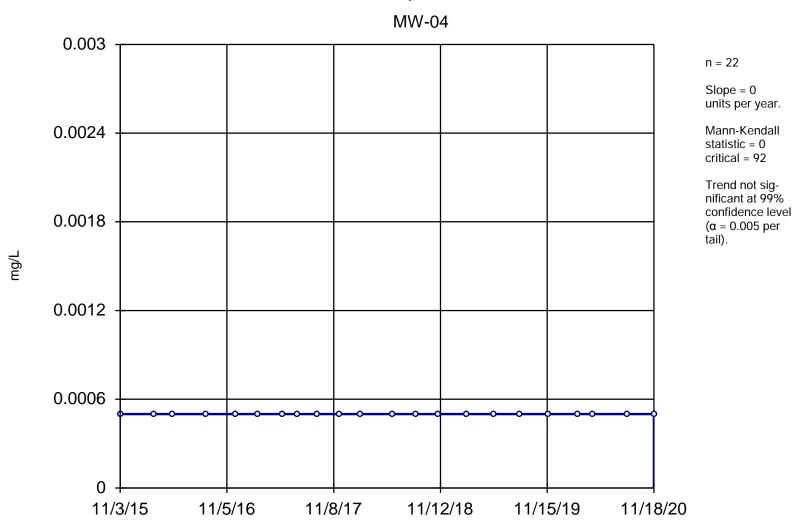
Constituent: Cadmium, Total Analysis Run 4/14/2021 1:01 PM



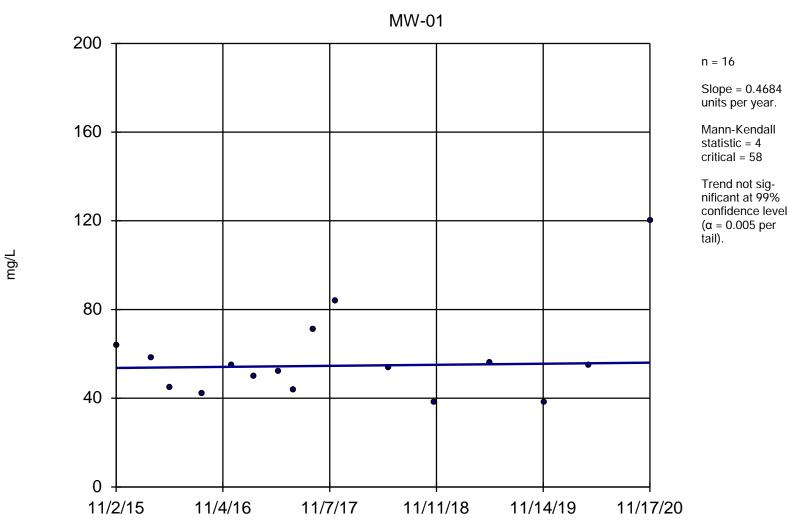
Constituent: Cadmium, Total Analysis Run 4/14/2021 1:01 PM



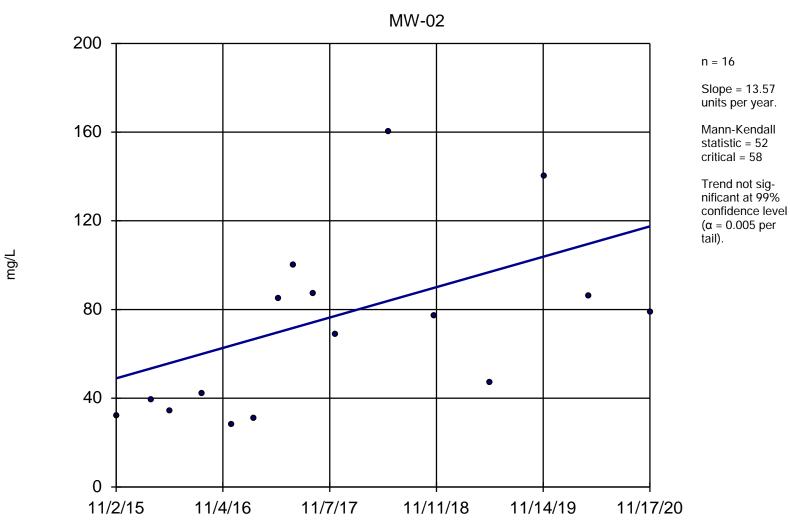
Constituent: Cadmium, Total Analysis Run 4/14/2021 1:01 PM



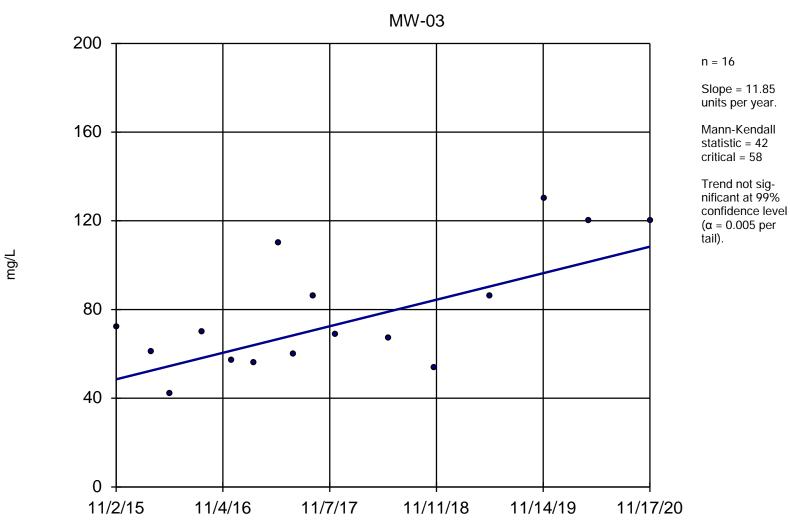
Constituent: Cadmium, Total Analysis Run 4/14/2021 1:01 PM



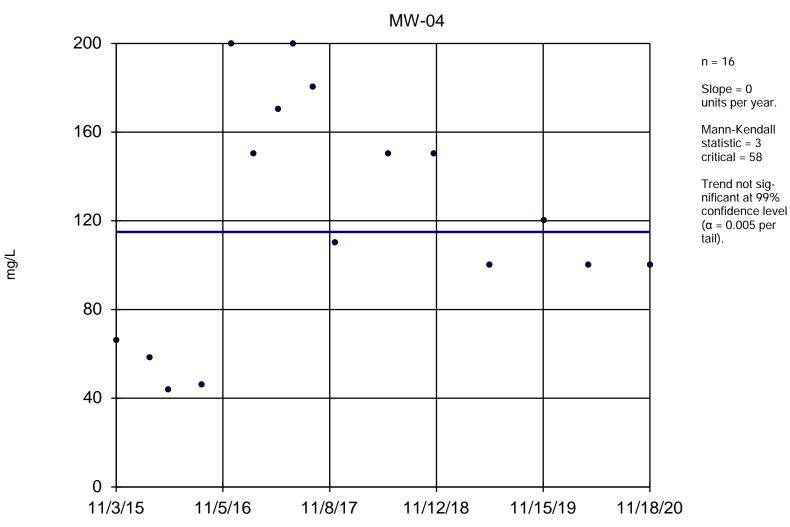
Constituent: Calcium, Total Analysis Run 4/14/2021 1:01 PM



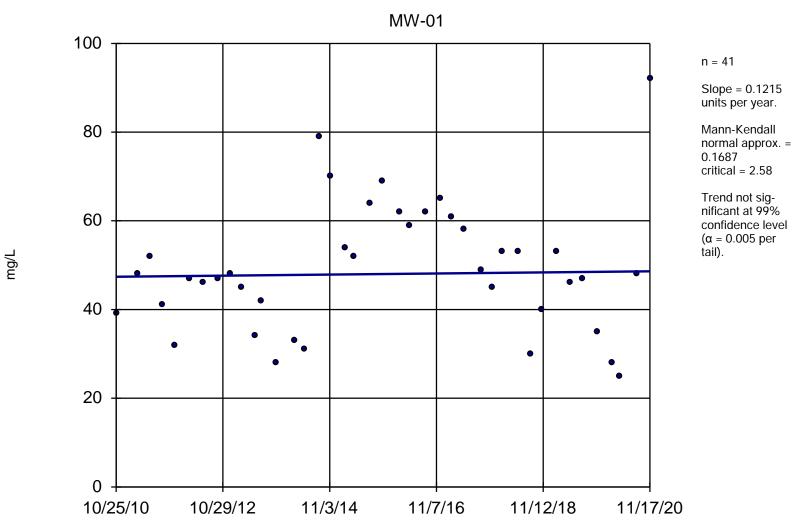
Constituent: Calcium, Total Analysis Run 4/14/2021 1:01 PM



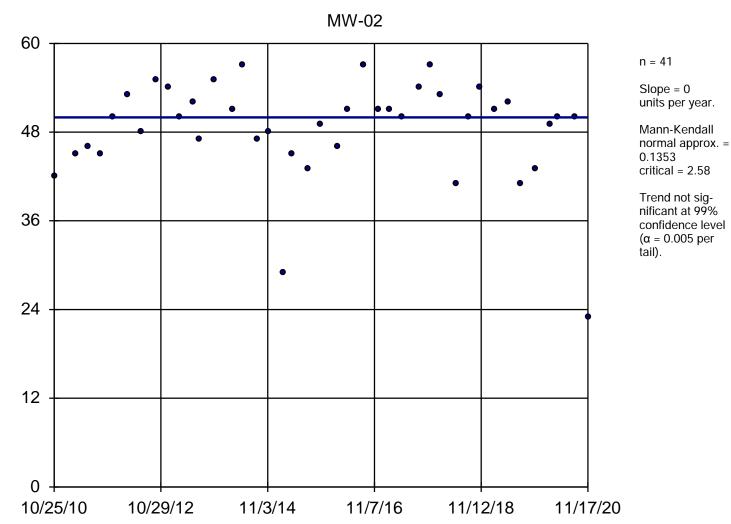
Constituent: Calcium, Total Analysis Run 4/14/2021 1:01 PM



Constituent: Calcium, Total Analysis Run 4/14/2021 1:01 PM



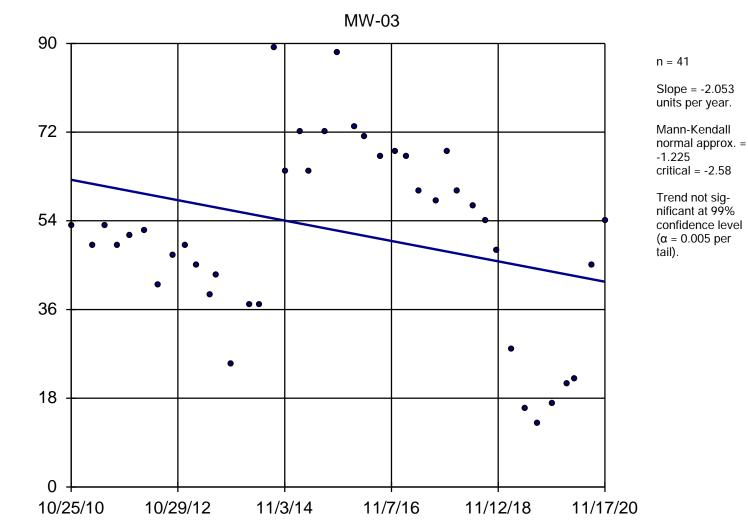
Constituent: Chloride Analysis Run 4/14/2021 1:01 PM



Constituent: Chloride Analysis Run 4/14/2021 1:01 PM

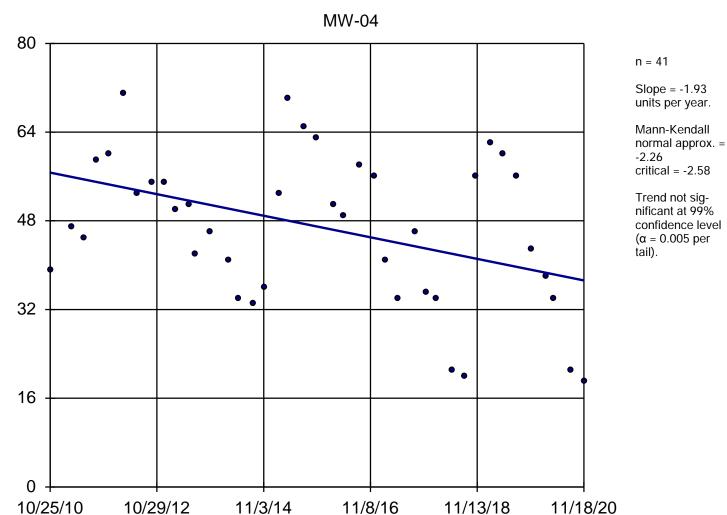
mg/L

# Sen's Slope Estimator

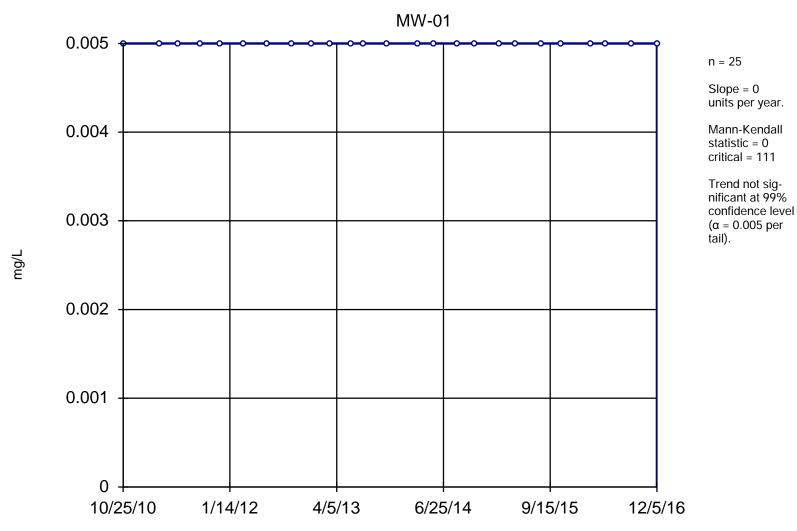


Constituent: Chloride Analysis Run 4/14/2021 1:01 PM

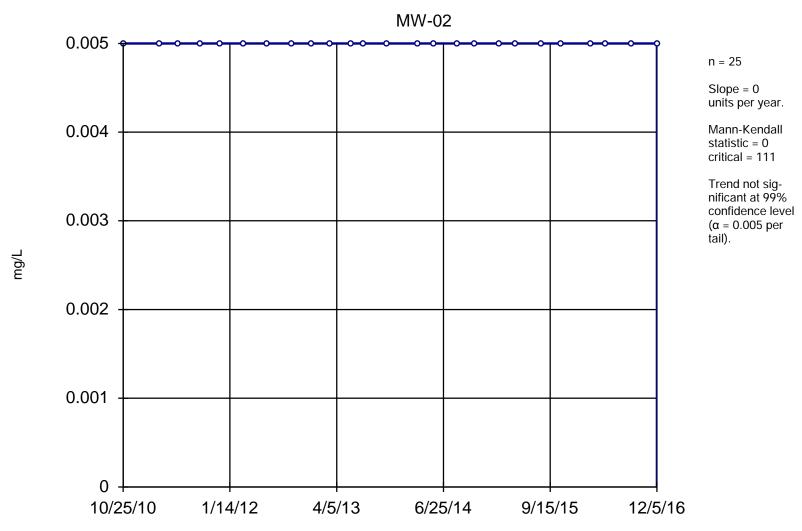
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database



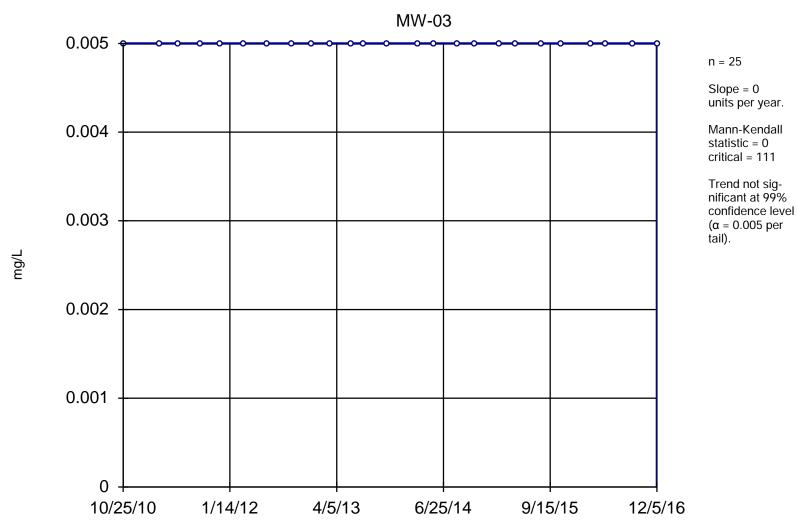
Constituent: Chloride Analysis Run 4/14/2021 1:01 PM



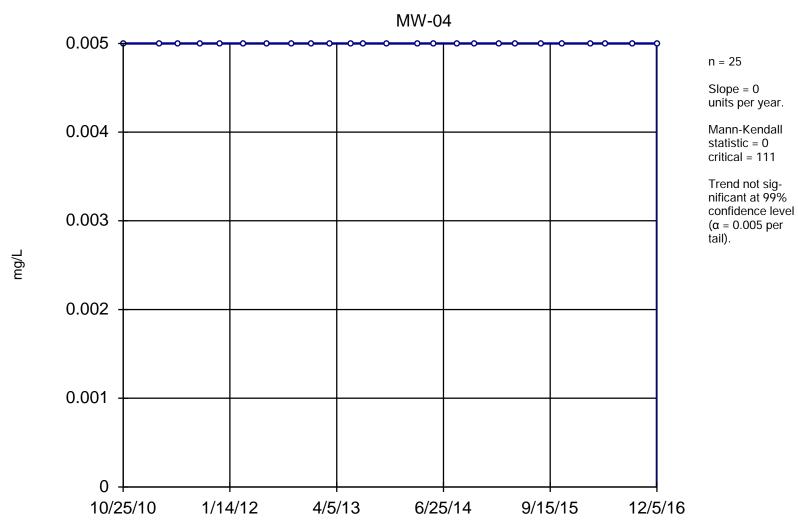
Constituent: Chromium, Dissolved Analysis Run 4/14/2021 1:01 PM
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database



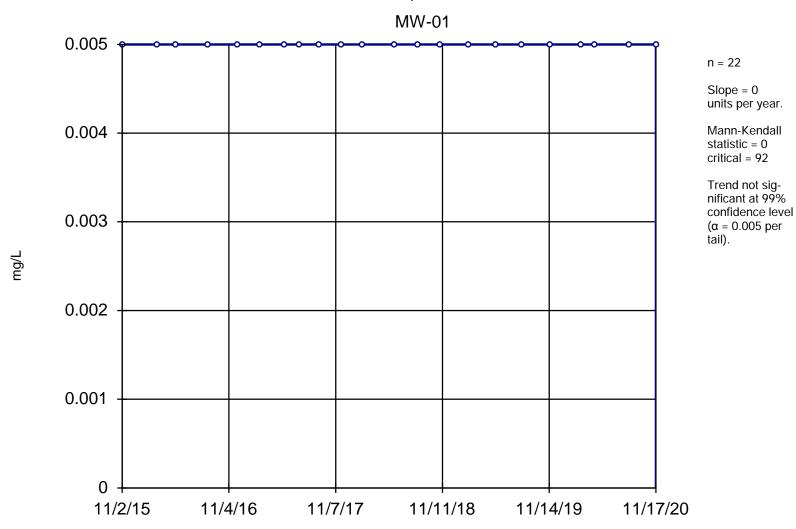
Constituent: Chromium, Dissolved Analysis Run 4/14/2021 1:01 PM
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database



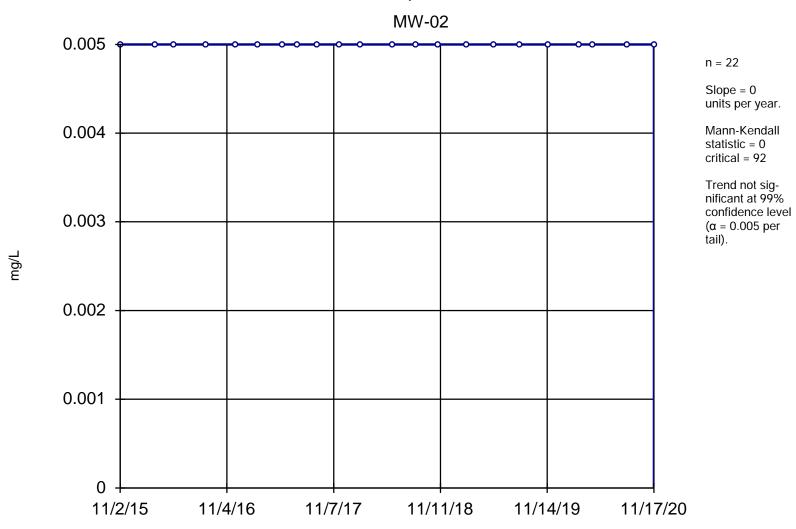
Constituent: Chromium, Dissolved Analysis Run 4/14/2021 1:01 PM
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database



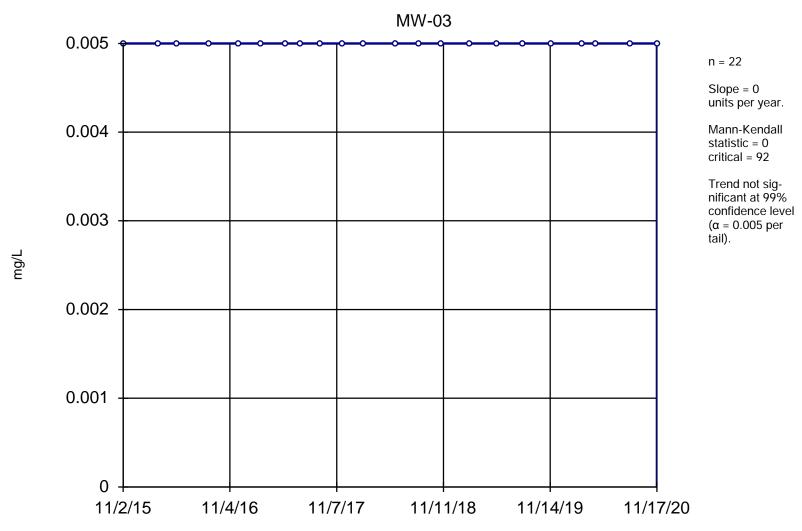
Constituent: Chromium, Dissolved Analysis Run 4/14/2021 1:01 PM
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database



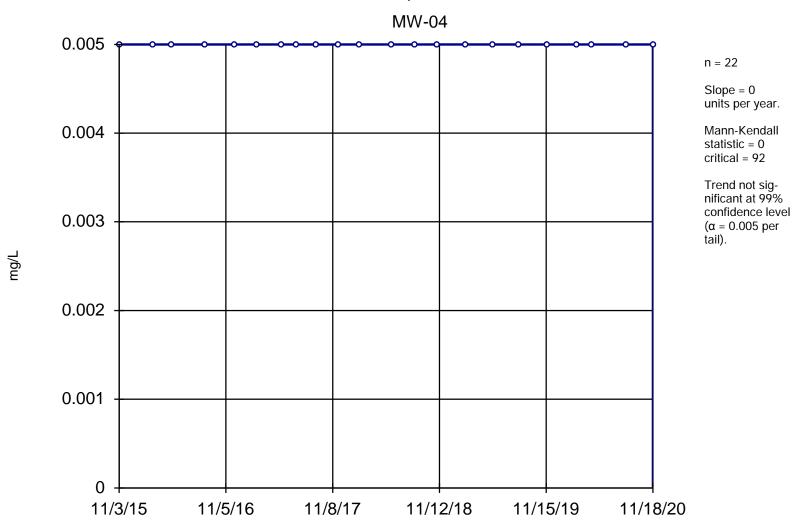
Constituent: Chromium, Total Analysis Run 4/14/2021 1:01 PM



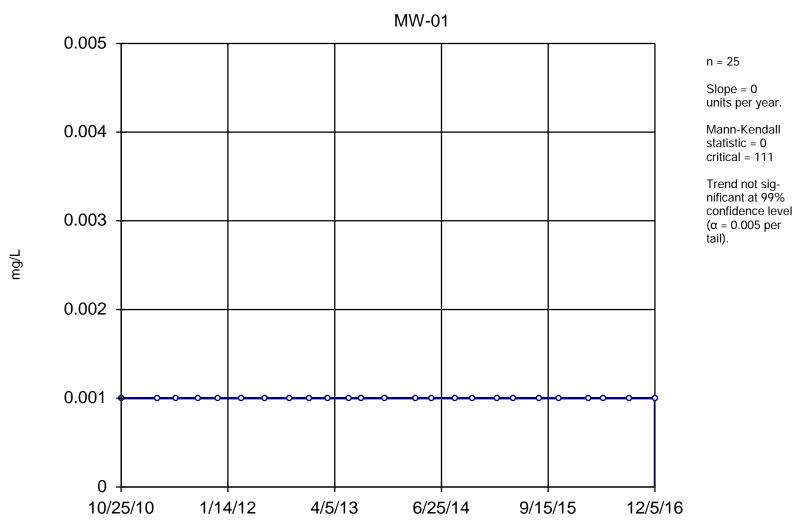
Constituent: Chromium, Total Analysis Run 4/14/2021 1:01 PM



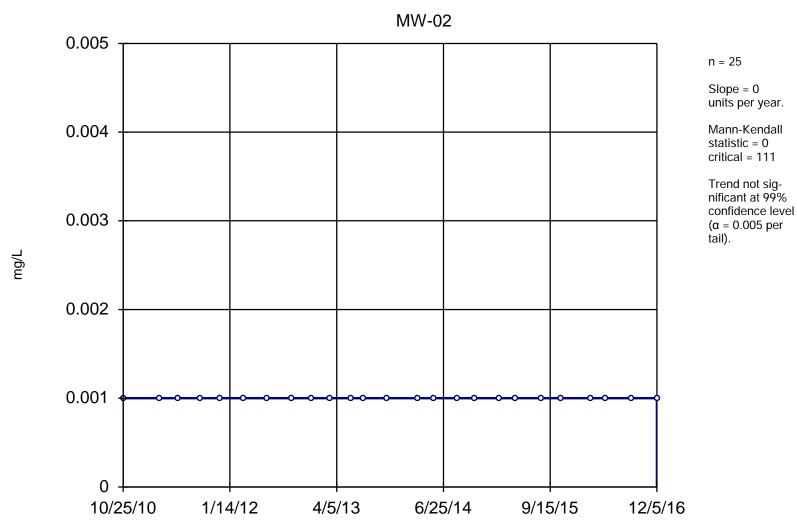
Constituent: Chromium, Total Analysis Run 4/14/2021 1:01 PM



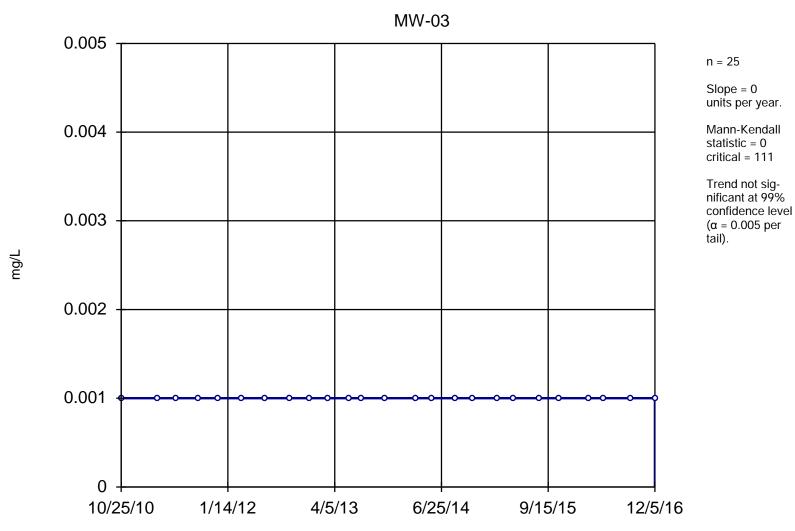
Constituent: Chromium, Total Analysis Run 4/14/2021 1:01 PM



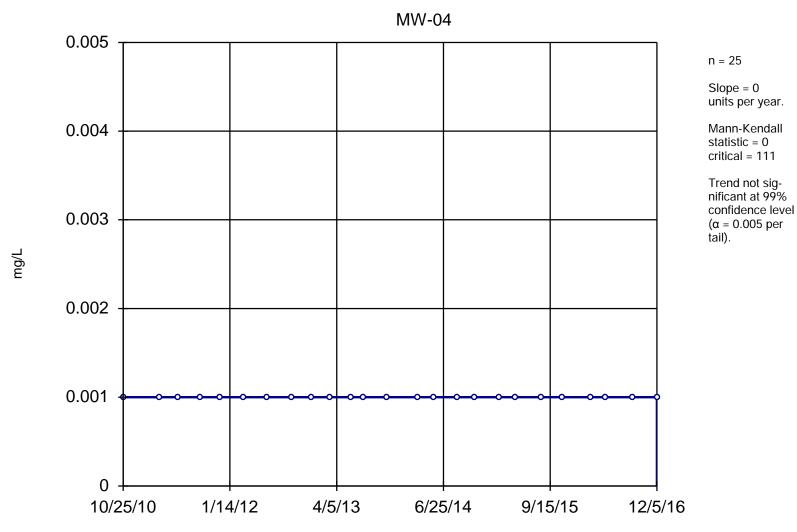
Constituent: Cobalt, Dissolved Analysis Run 4/14/2021 1:01 PM



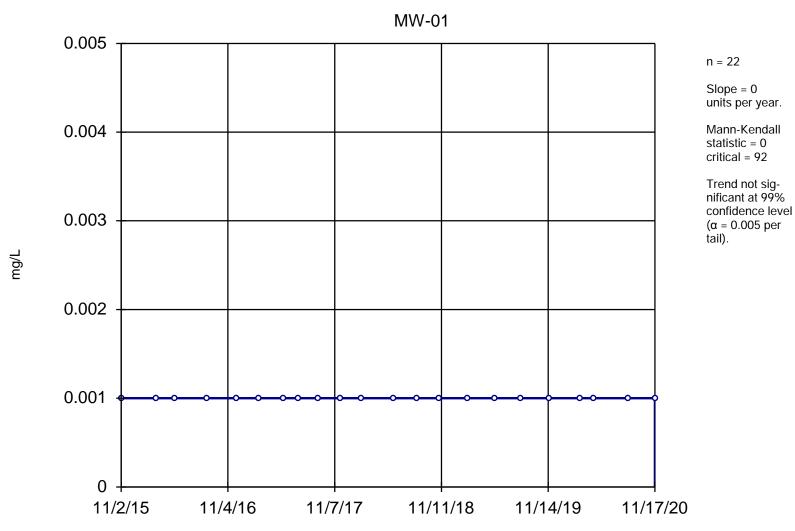
Constituent: Cobalt, Dissolved Analysis Run 4/14/2021 1:01 PM



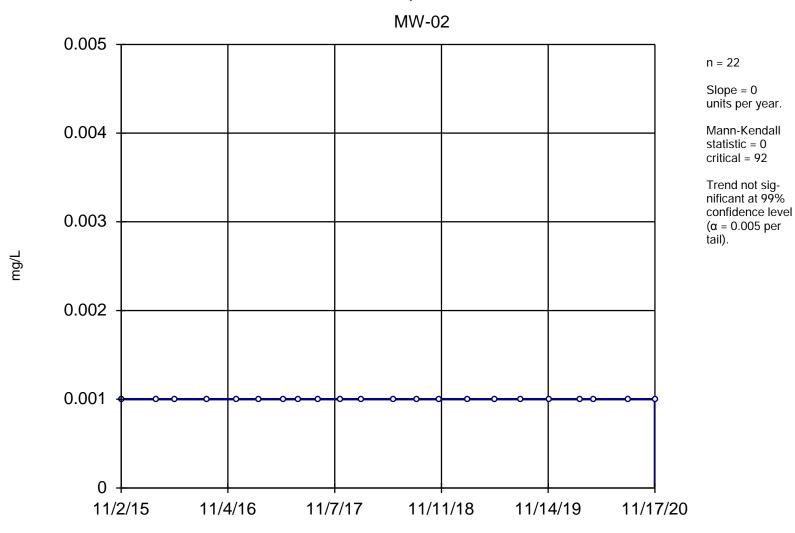
Constituent: Cobalt, Dissolved Analysis Run 4/14/2021 1:01 PM



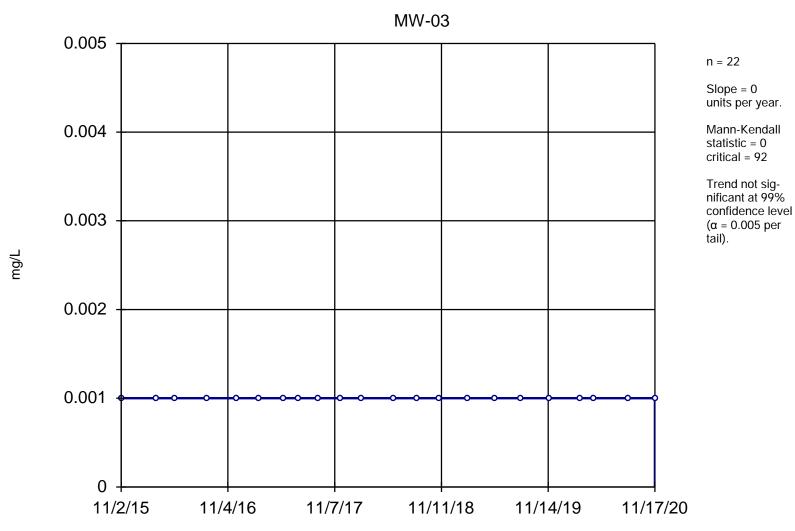
Constituent: Cobalt, Dissolved Analysis Run 4/14/2021 1:01 PM



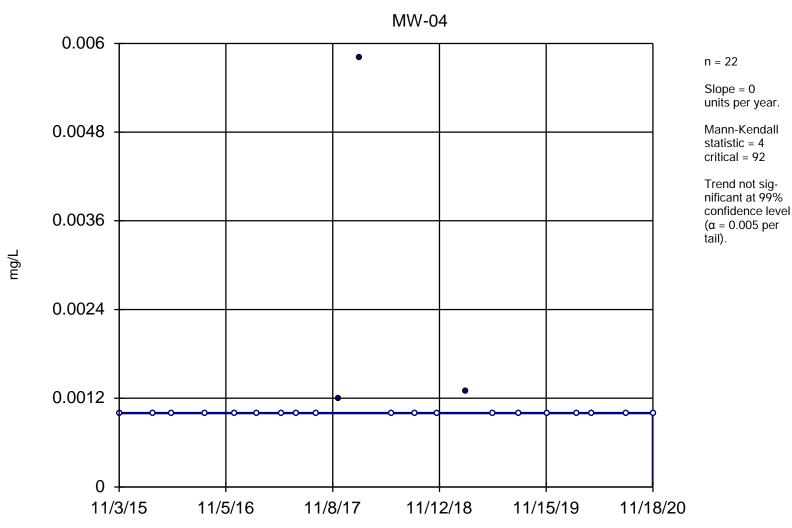
Constituent: Cobalt, Total Analysis Run 4/14/2021 1:01 PM



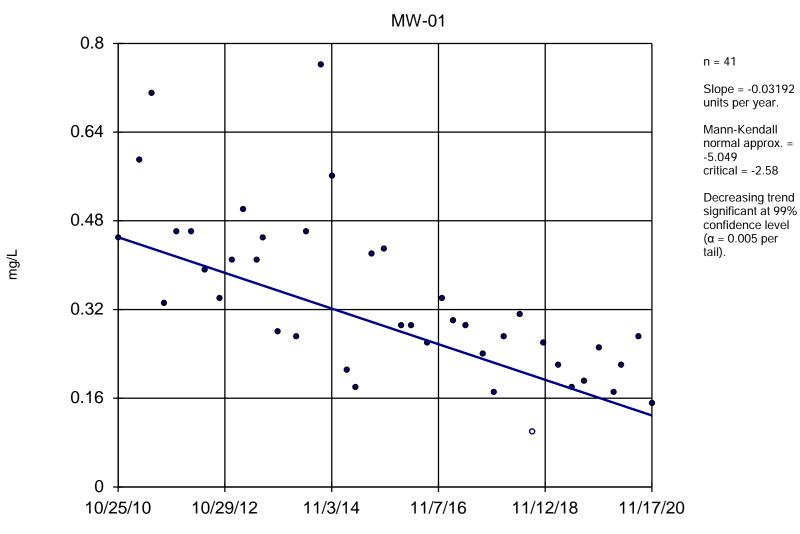
Constituent: Cobalt, Total Analysis Run 4/14/2021 1:01 PM



Constituent: Cobalt, Total Analysis Run 4/14/2021 1:02 PM



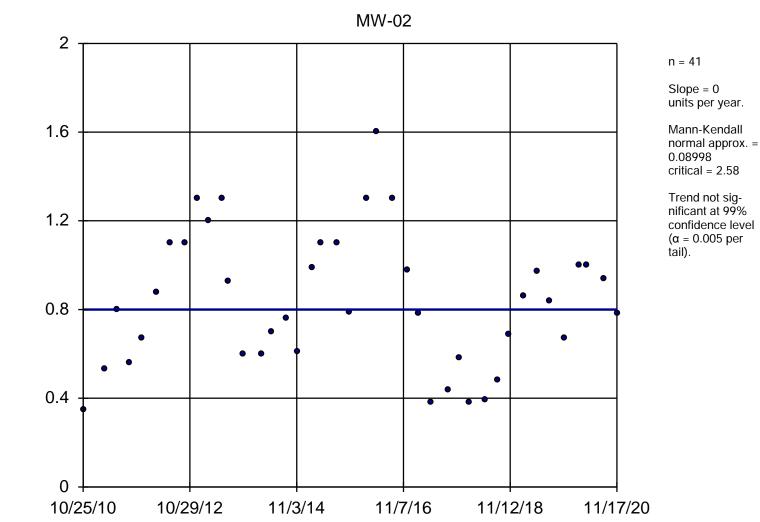
Constituent: Cobalt, Total Analysis Run 4/14/2021 1:02 PM



Constituent: Fluoride Analysis Run 4/14/2021 1:02 PM

Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database

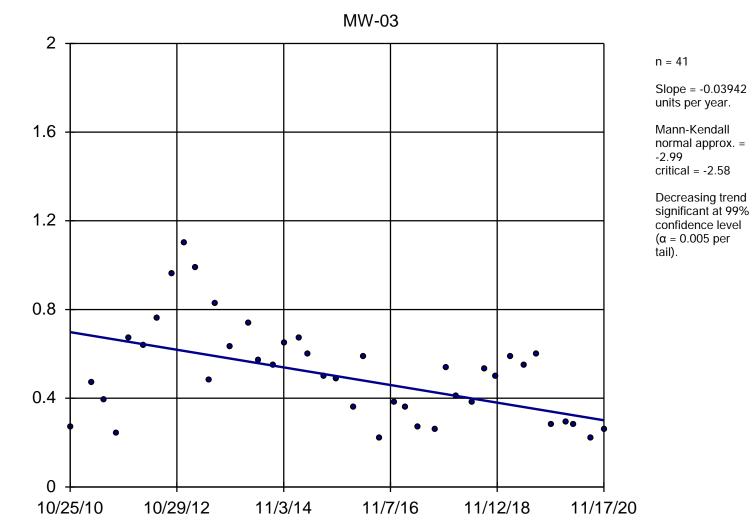
mg/L



Constituent: Fluoride Analysis Run 4/14/2021 1:02 PM

Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database

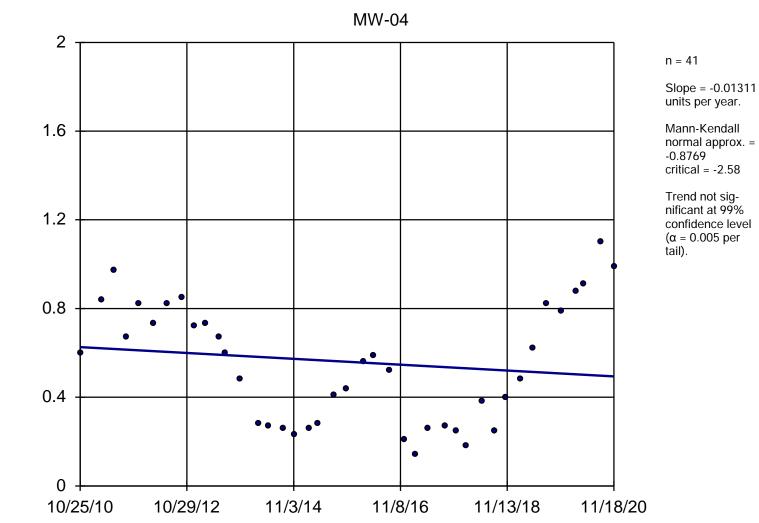
mg/L



Constituent: Fluoride Analysis Run 4/14/2021 1:02 PM

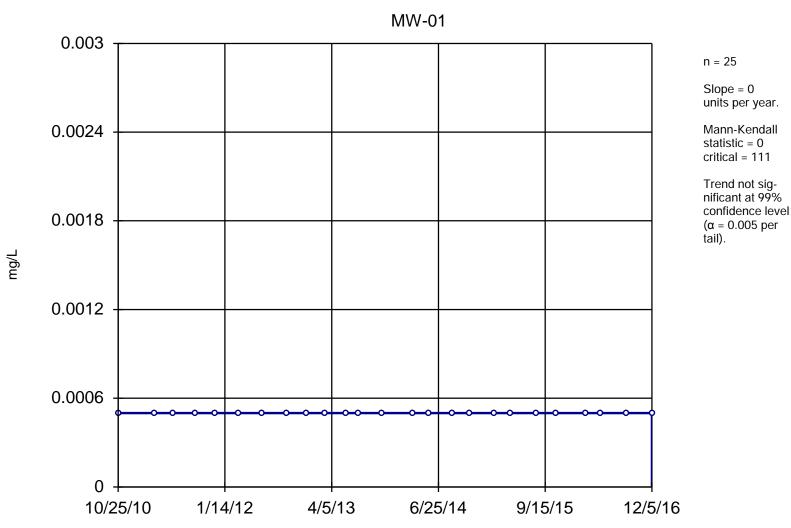
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database

mg/L

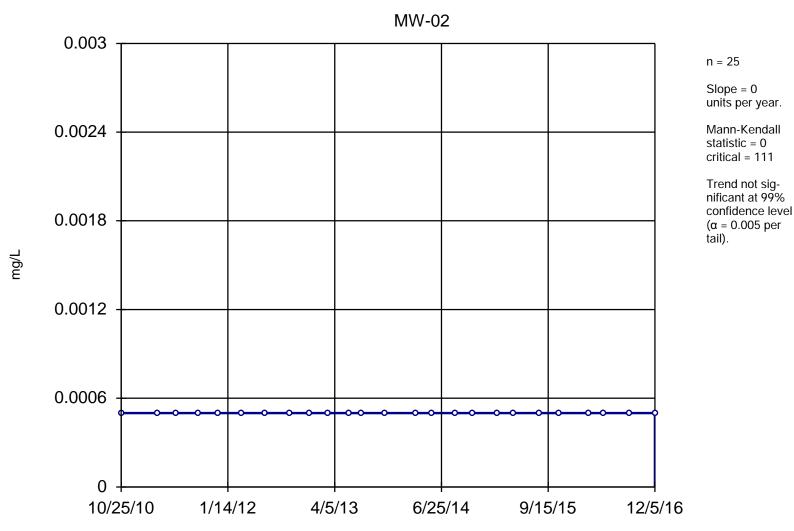


Constituent: Fluoride Analysis Run 4/14/2021 1:02 PM

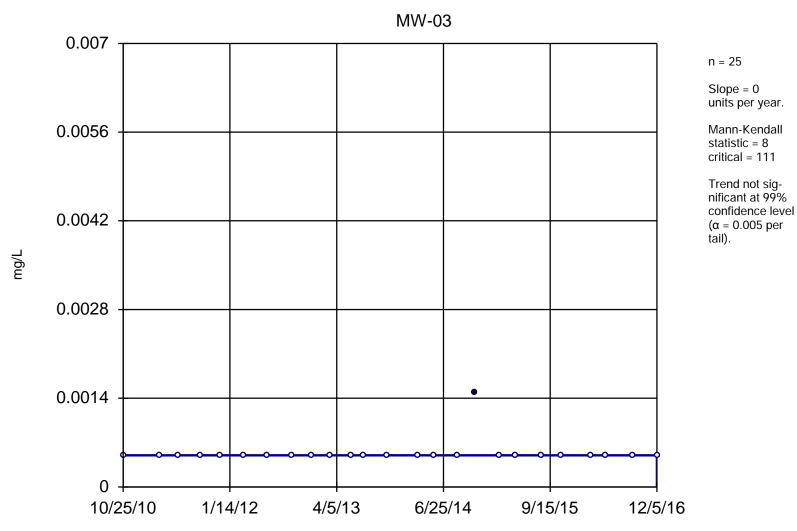
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database



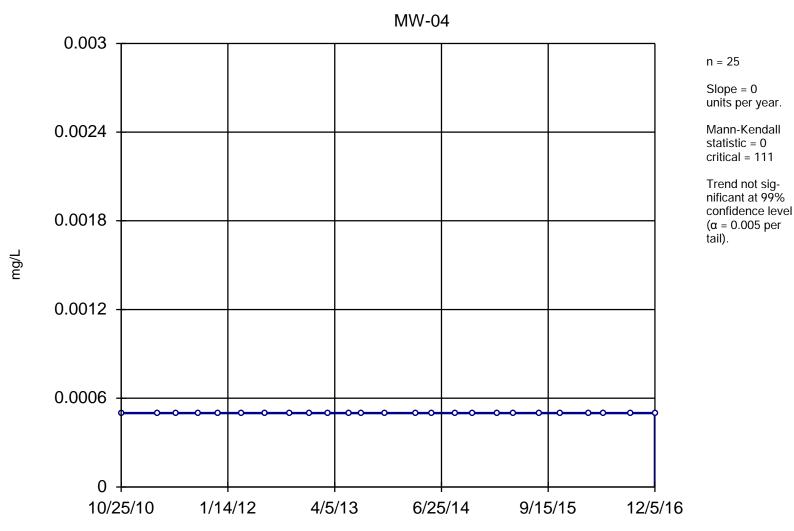
Constituent: Lead, Dissolved Analysis Run 4/14/2021 1:02 PM



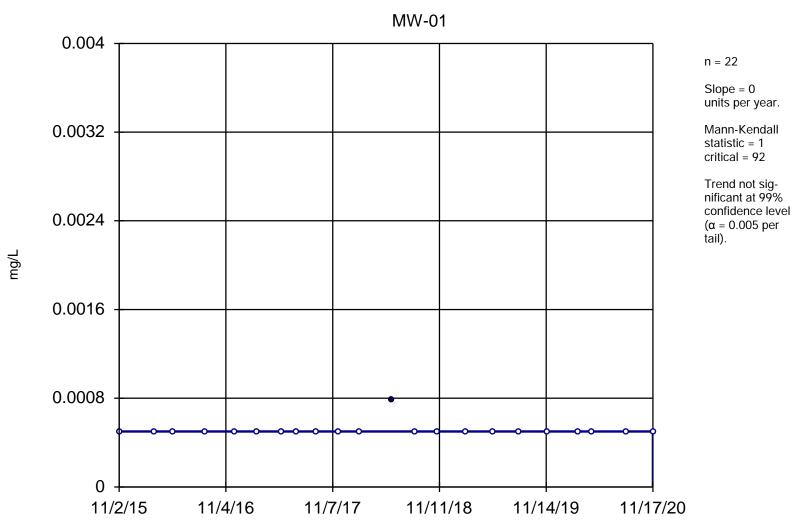
Constituent: Lead, Dissolved Analysis Run 4/14/2021 1:02 PM



Constituent: Lead, Dissolved Analysis Run 4/14/2021 1:02 PM

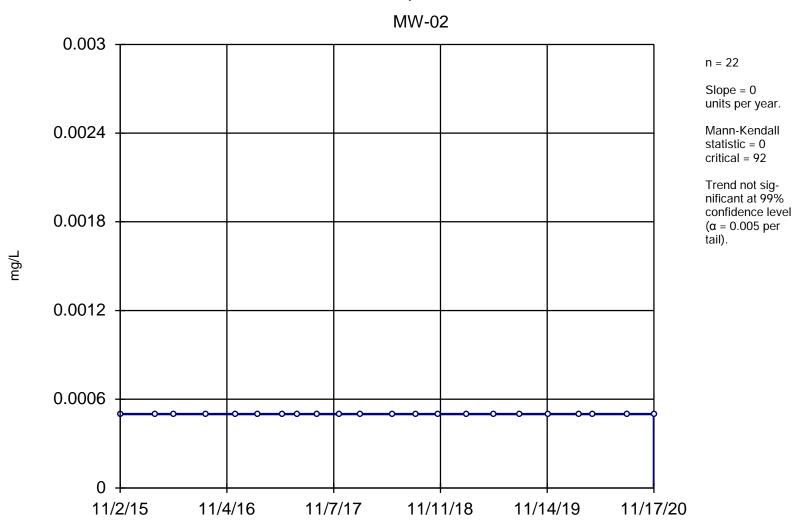


Constituent: Lead, Dissolved Analysis Run 4/14/2021 1:02 PM



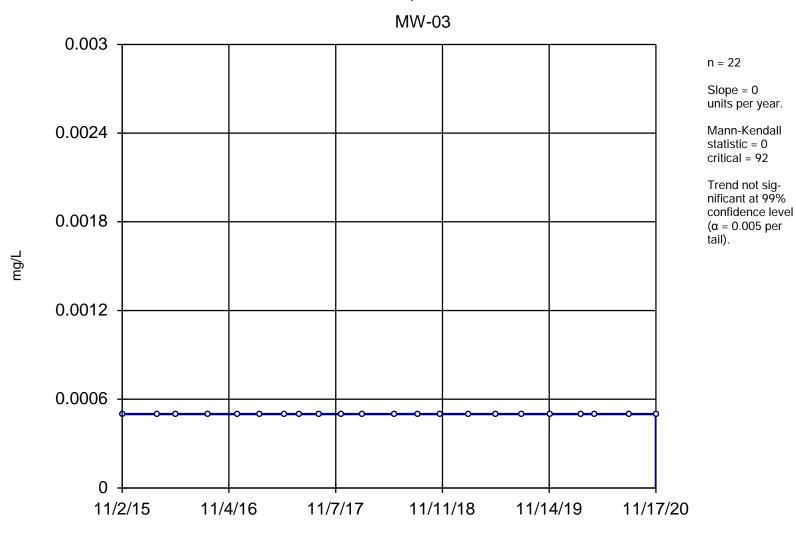
Constituent: Lead, Total Analysis Run 4/14/2021 1:02 PM

Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database

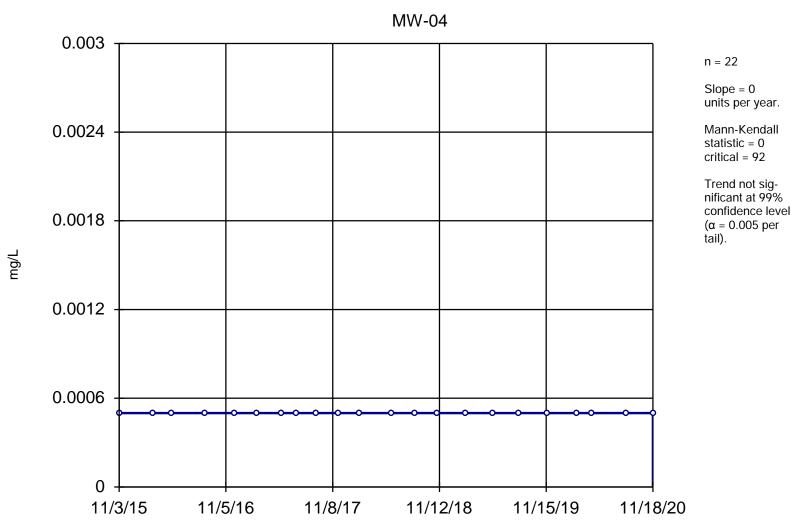


Constituent: Lead, Total Analysis Run 4/14/2021 1:02 PM

Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database

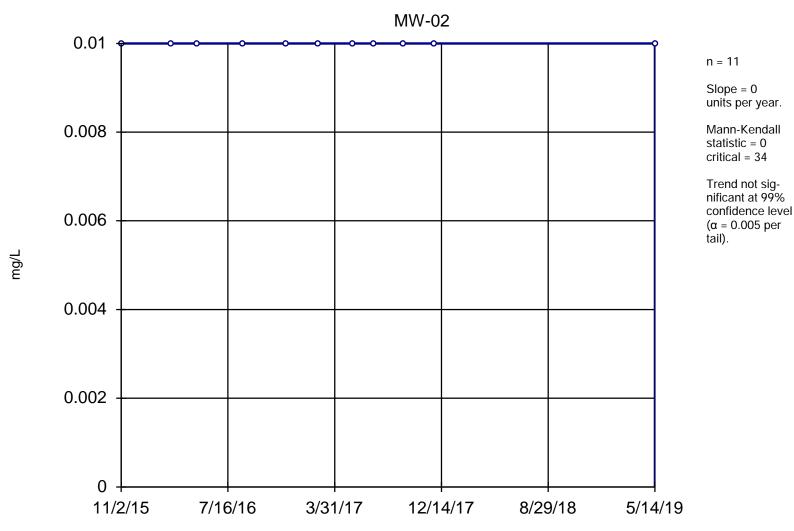


Constituent: Lead, Total Analysis Run 4/14/2021 1:02 PM

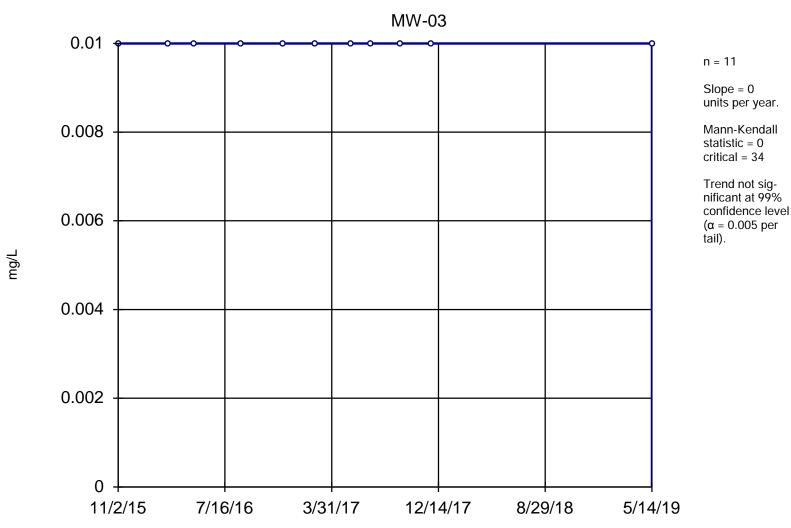


Constituent: Lead, Total Analysis Run 4/14/2021 1:02 PM

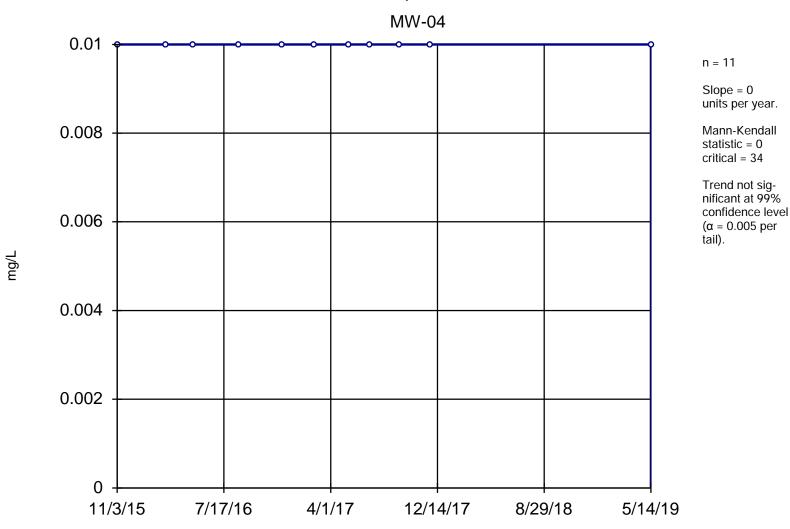
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database



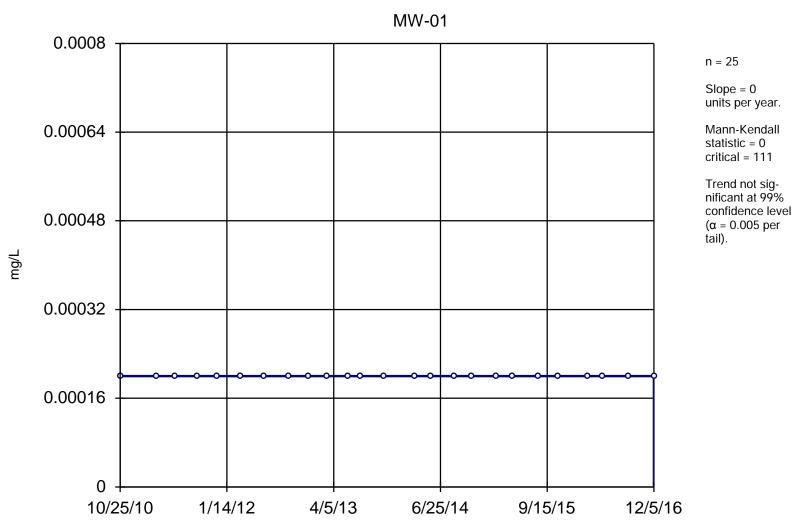
Constituent: Lithium, Total Analysis Run 4/14/2021 1:02 PM



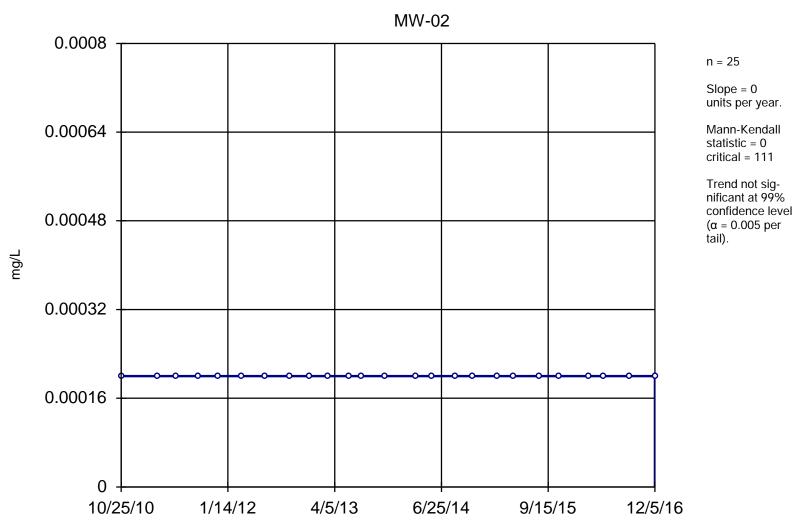
Constituent: Lithium, Total Analysis Run 4/14/2021 1:02 PM



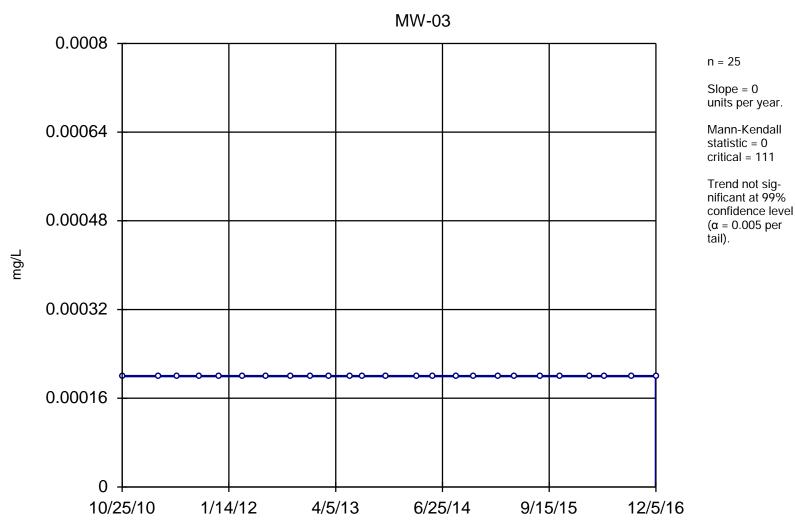
Constituent: Lithium, Total Analysis Run 4/14/2021 1:02 PM



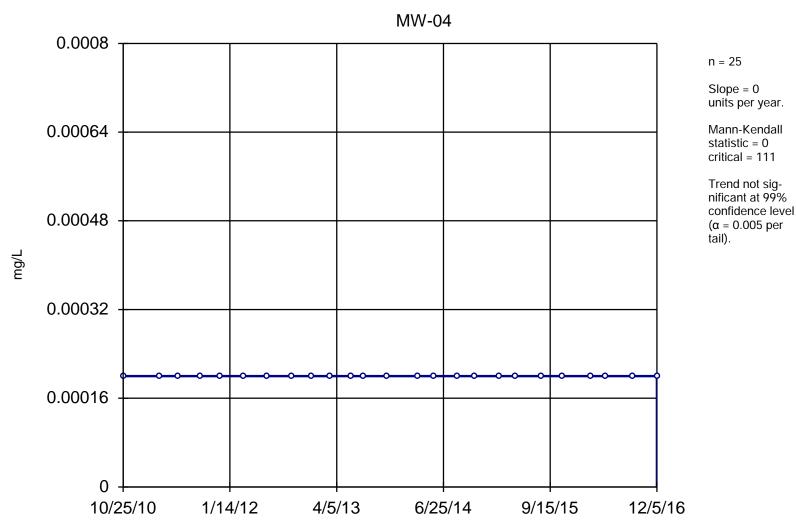
Constituent: Mercury, Dissolved Analysis Run 4/14/2021 1:02 PM



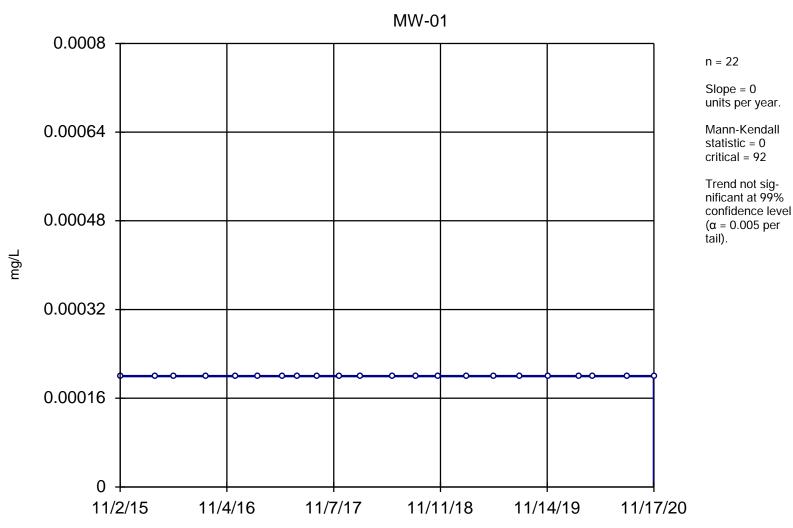
Constituent: Mercury, Dissolved Analysis Run 4/14/2021 1:02 PM



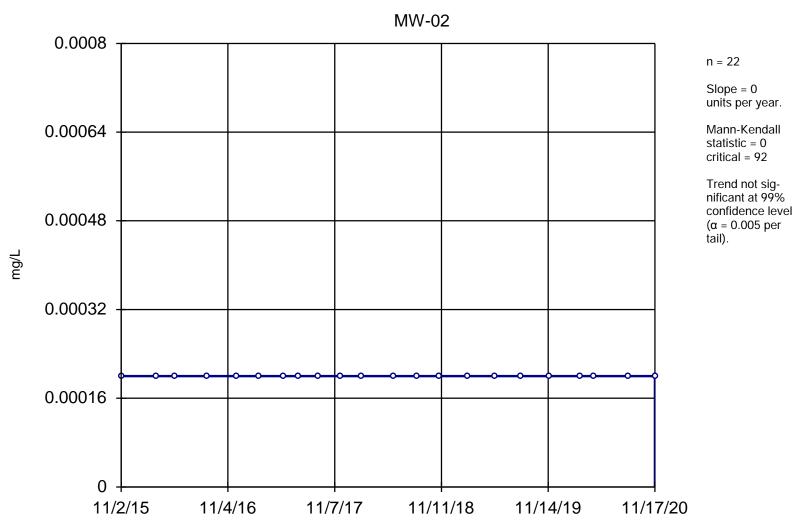
Constituent: Mercury, Dissolved Analysis Run 4/14/2021 1:02 PM



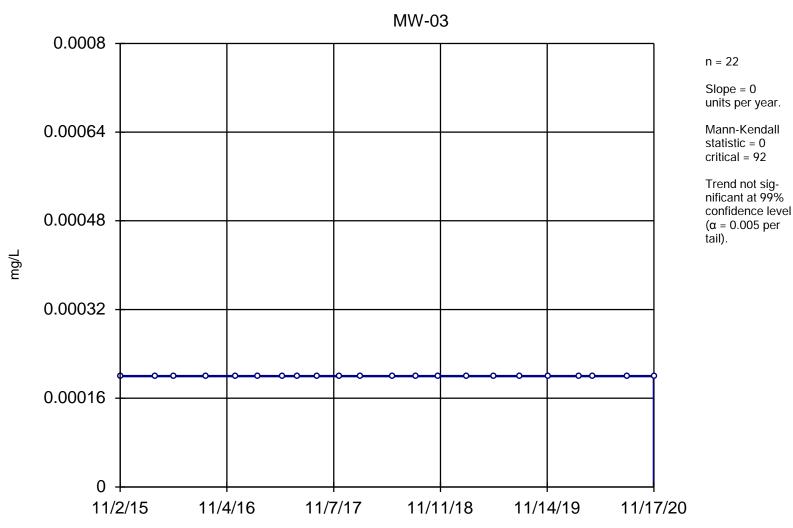
Constituent: Mercury, Dissolved Analysis Run 4/14/2021 1:02 PM



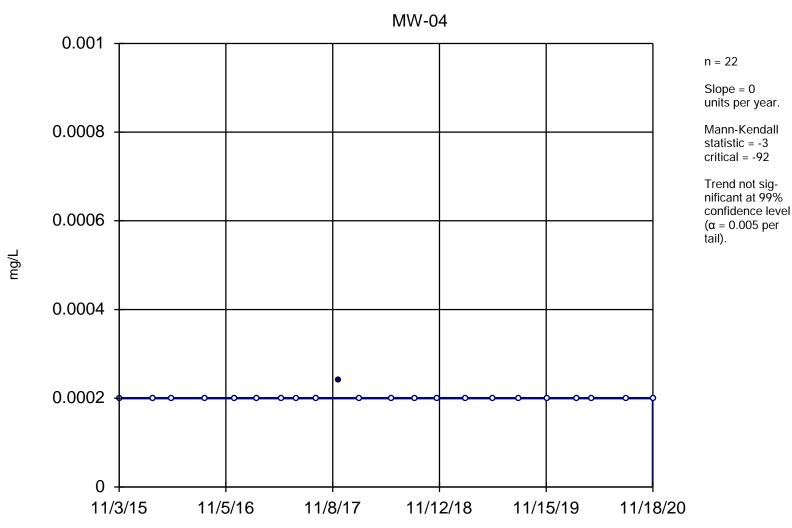
Constituent: Mercury, Total Analysis Run 4/14/2021 1:02 PM



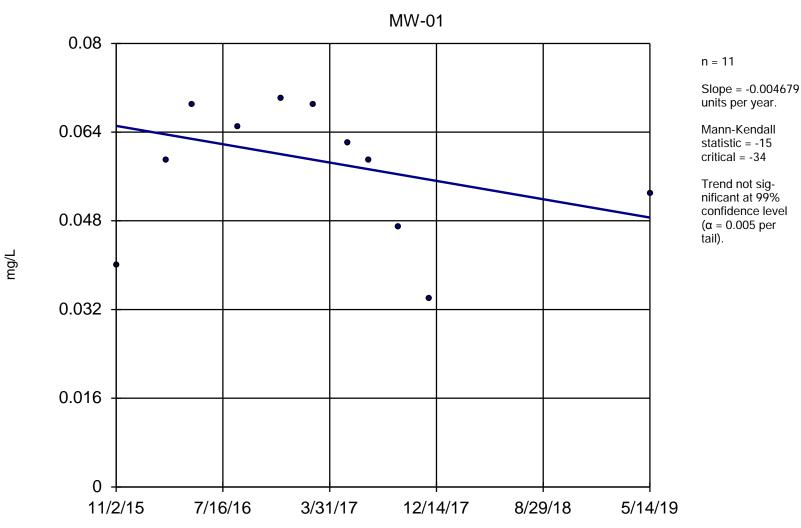
Constituent: Mercury, Total Analysis Run 4/14/2021 1:02 PM



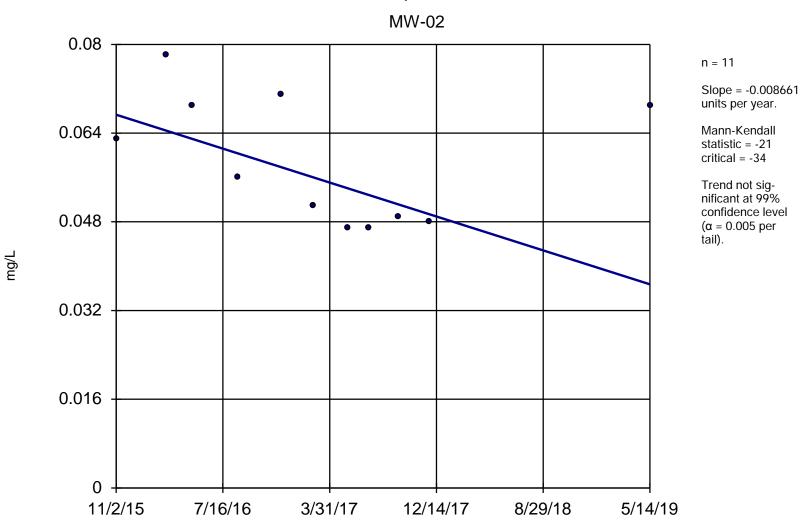
Constituent: Mercury, Total Analysis Run 4/14/2021 1:02 PM



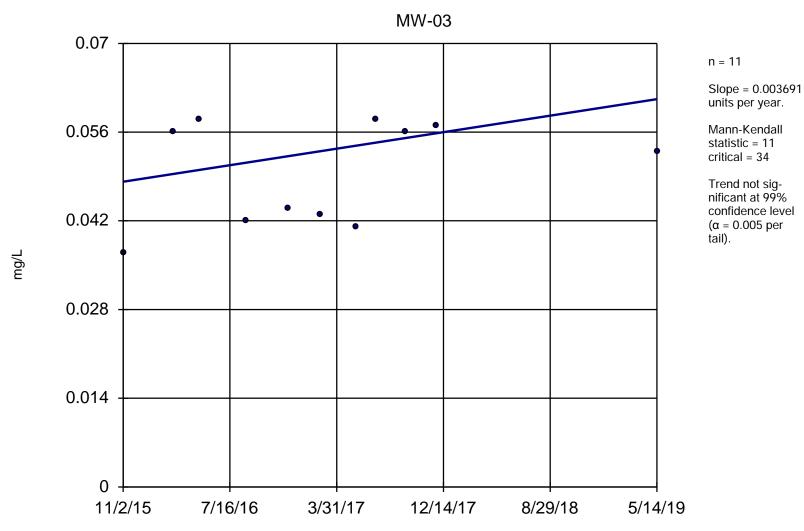
Constituent: Mercury, Total Analysis Run 4/14/2021 1:02 PM



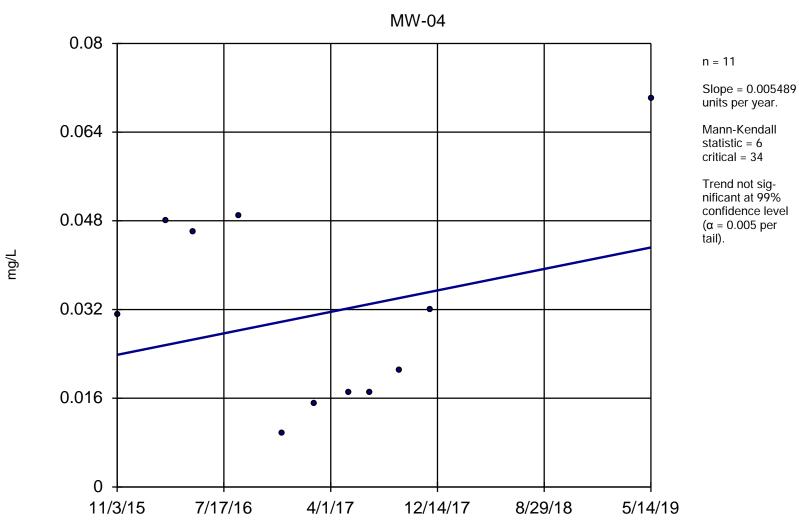
Constituent: Molybdenum, Total Analysis Run 4/14/2021 1:02 PM



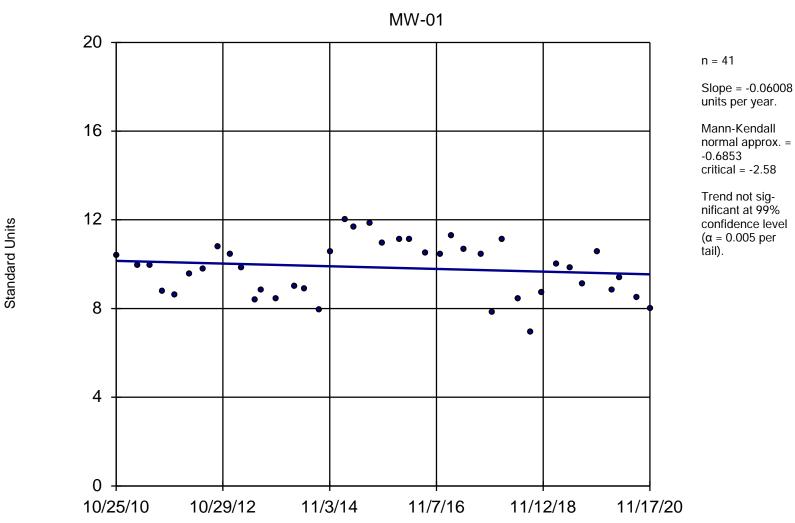
Constituent: Molybdenum, Total Analysis Run 4/14/2021 1:02 PM



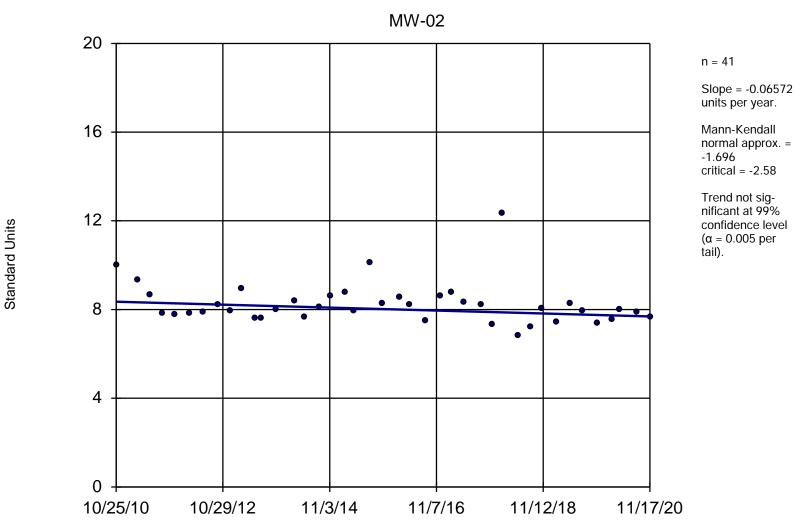
Constituent: Molybdenum, Total Analysis Run 4/14/2021 1:02 PM



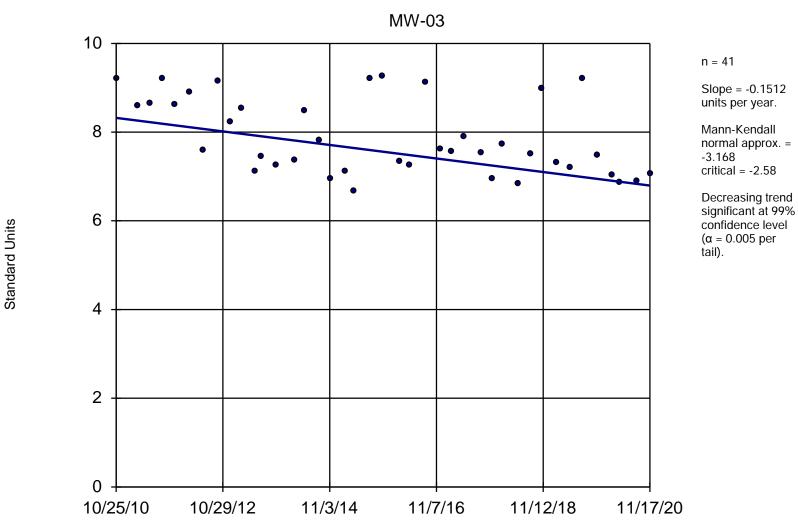
Constituent: Molybdenum, Total Analysis Run 4/14/2021 1:02 PM



Constituent: pH, Field Analysis Run 4/14/2021 1:02 PM

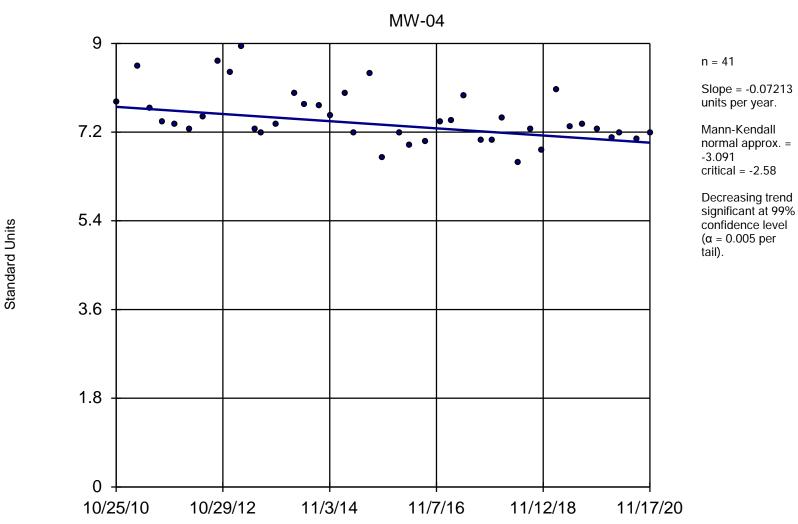


Constituent: pH, Field Analysis Run 4/14/2021 1:02 PM

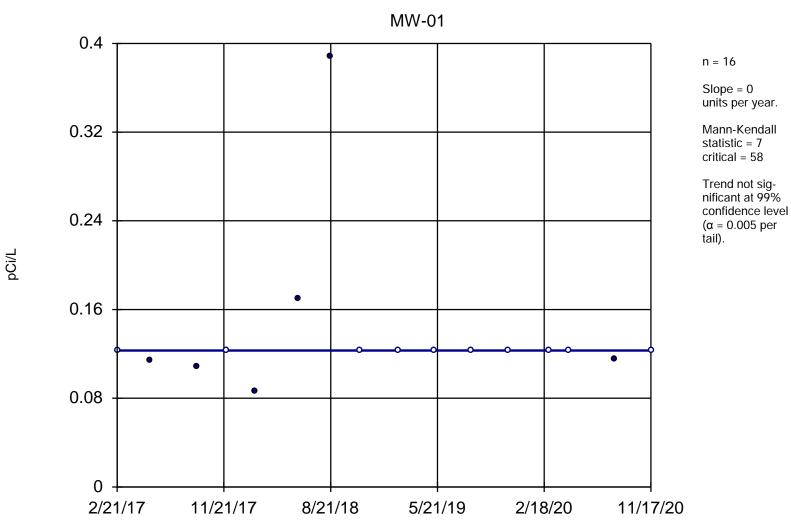


Constituent: pH, Field Analysis Run 4/14/2021 1:02 PM

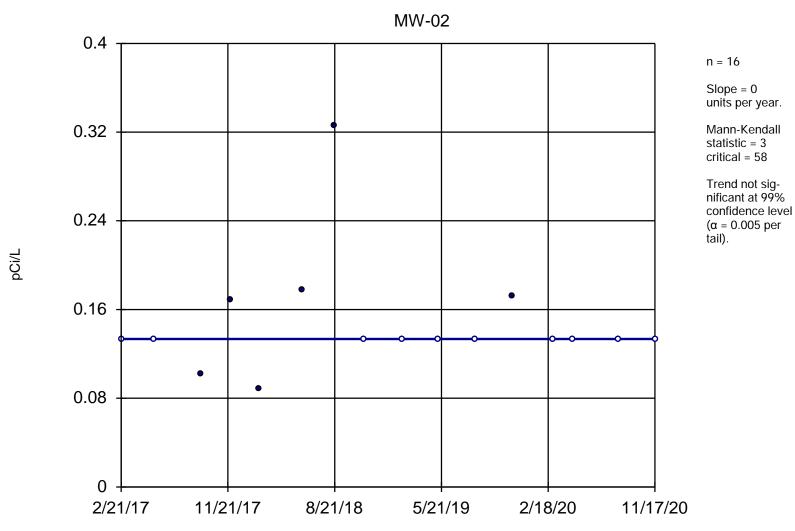
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database



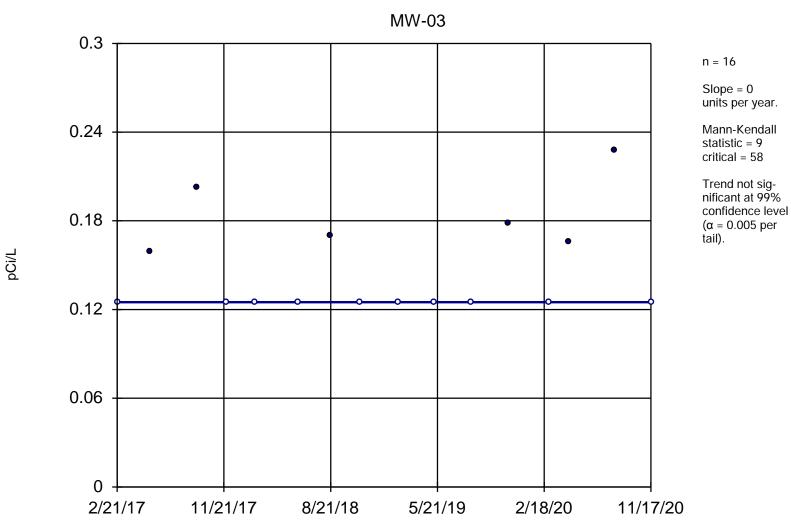
Constituent: pH, Field Analysis Run 4/14/2021 1:02 PM



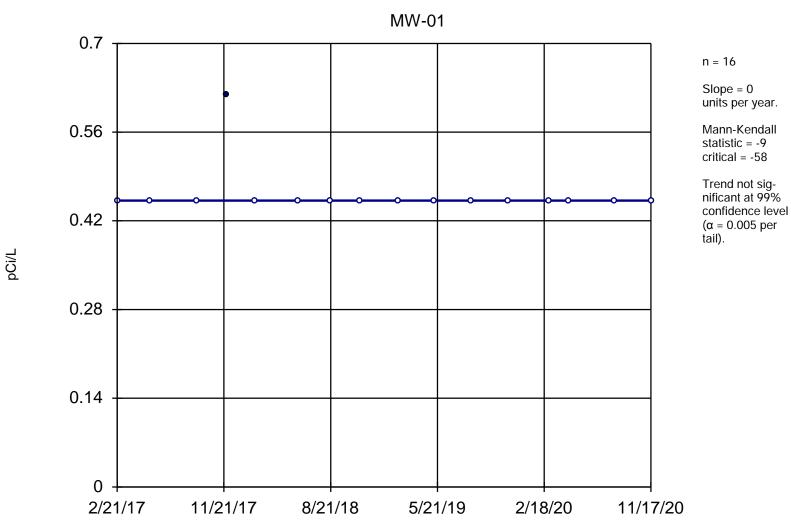
Constituent: Radium-226 Analysis Run 4/14/2021 1:02 PM



Constituent: Radium-226 Analysis Run 4/14/2021 1:02 PM



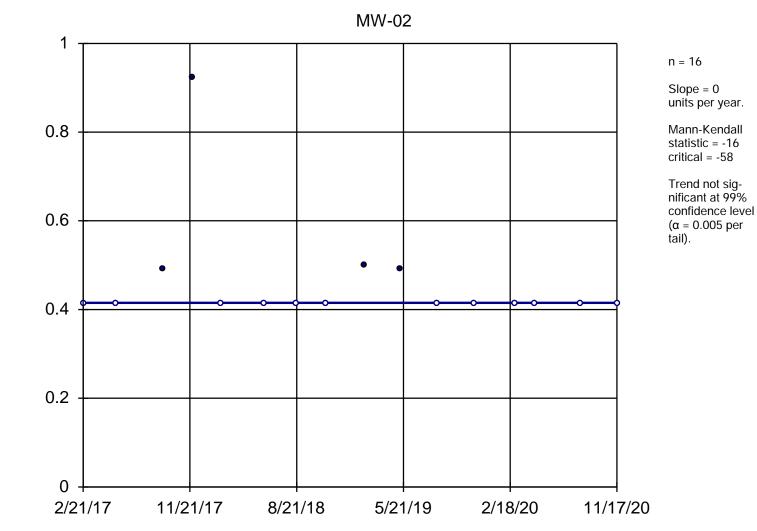
Constituent: Radium-226 Analysis Run 4/14/2021 1:02 PM



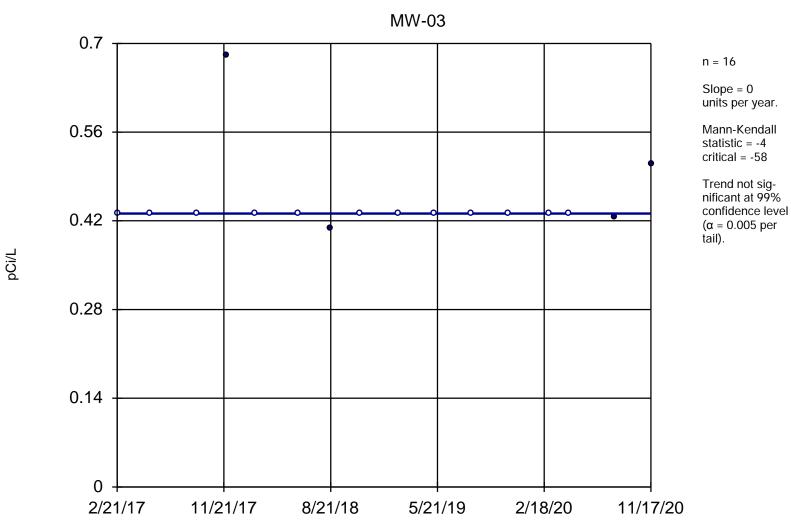
Constituent: Radium-228 Analysis Run 4/14/2021 1:02 PM

pCi/L

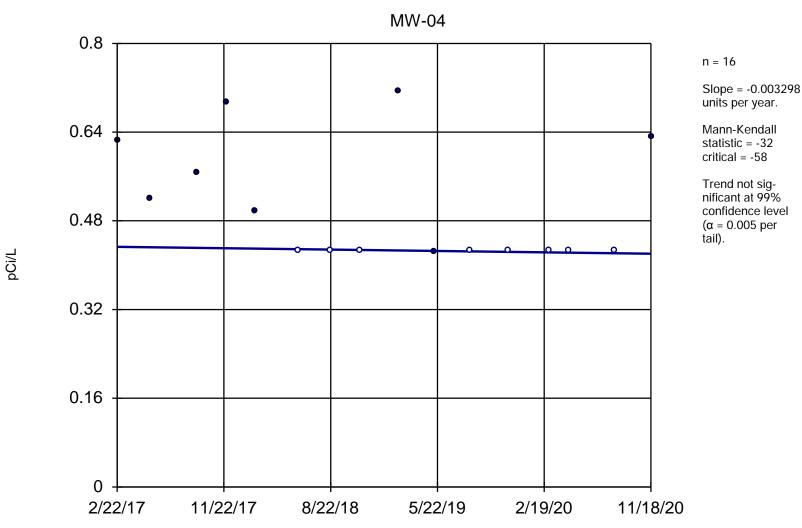
## Sen's Slope Estimator



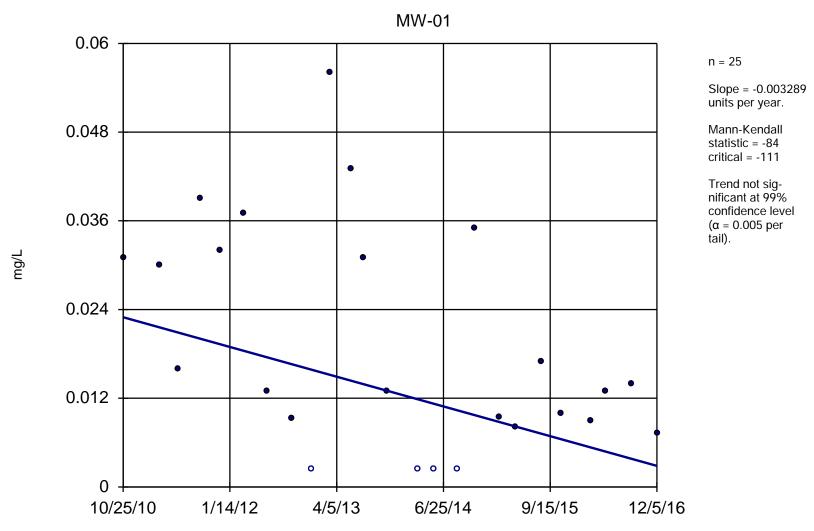
Constituent: Radium-228 Analysis Run 4/14/2021 1:02 PM



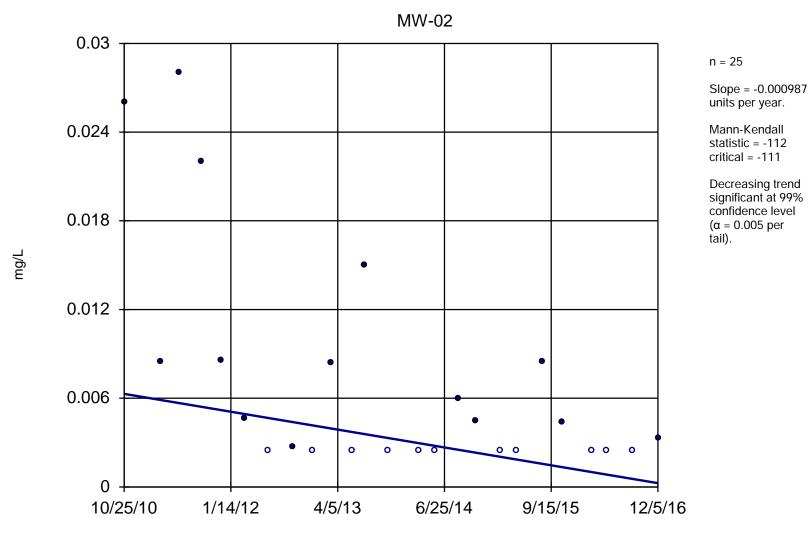
Constituent: Radium-228 Analysis Run 4/14/2021 1:02 PM



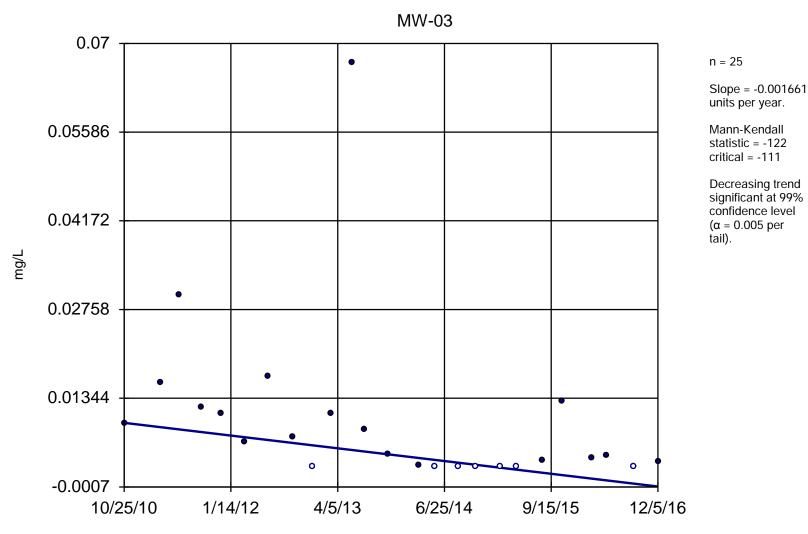
Constituent: Radium-228 Analysis Run 4/14/2021 1:02 PM



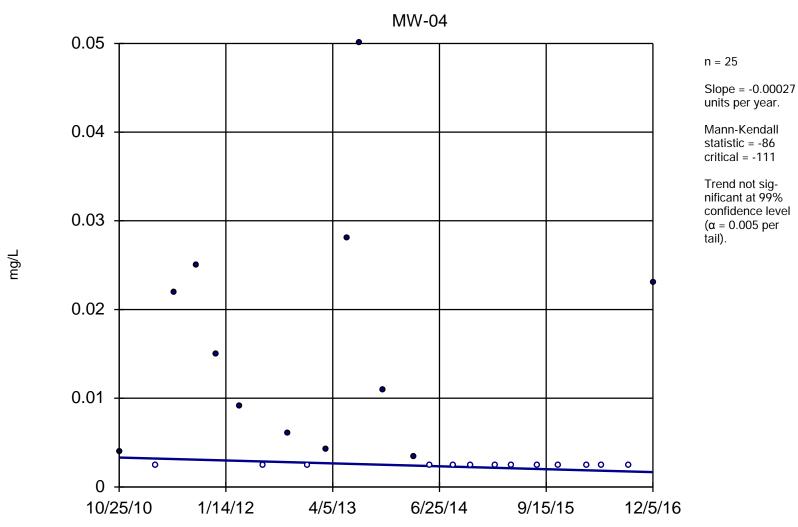
Constituent: Selenium, Dissolved Analysis Run 4/14/2021 1:02 PM



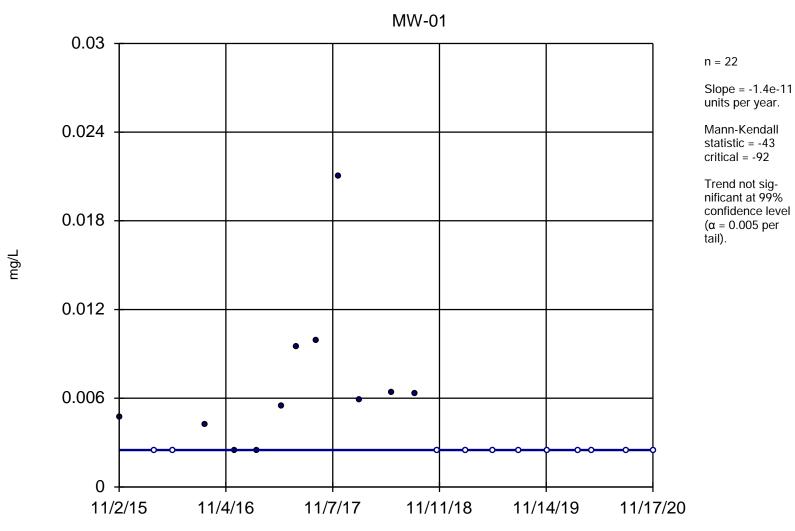
Constituent: Selenium, Dissolved Analysis Run 4/14/2021 1:02 PM
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database



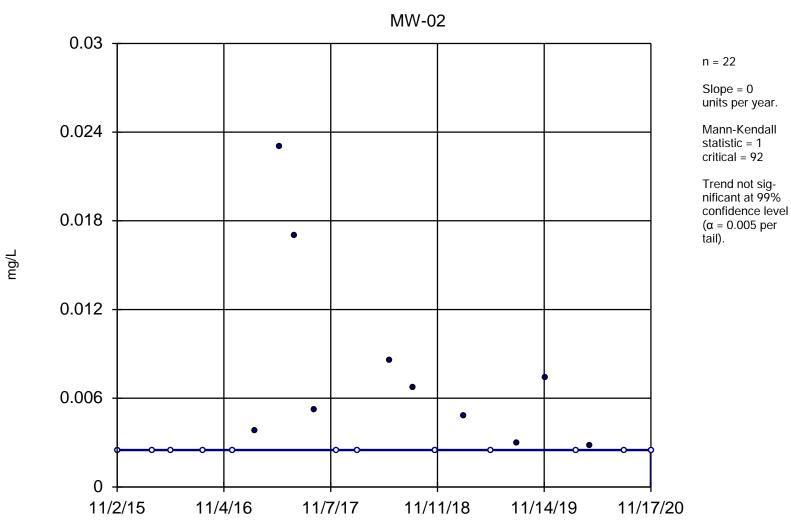
Constituent: Selenium, Dissolved Analysis Run 4/14/2021 1:02 PM



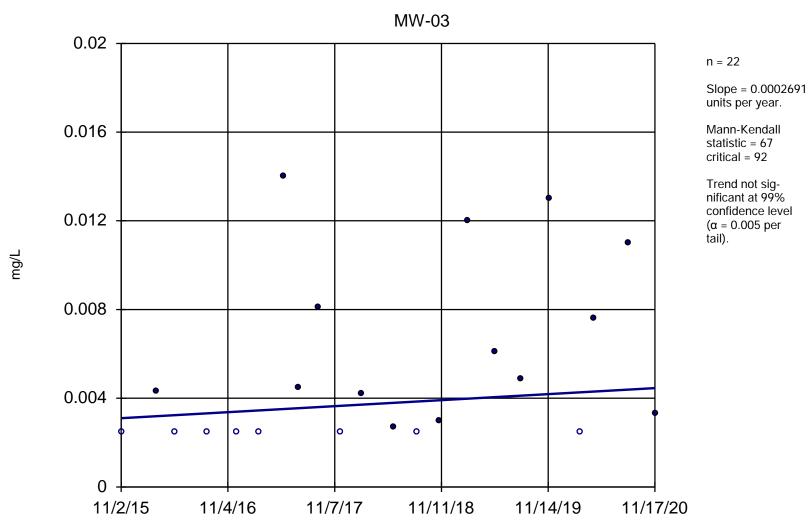
Constituent: Selenium, Dissolved Analysis Run 4/14/2021 1:02 PM



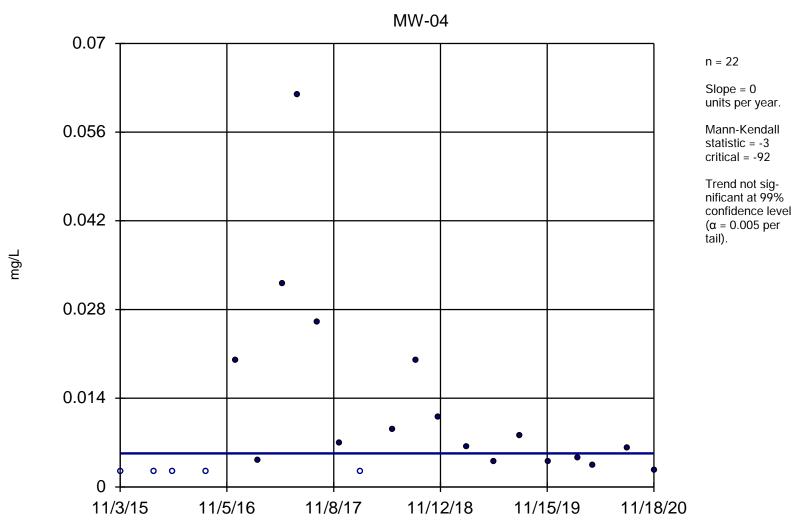
Constituent: Selenium, Total Analysis Run 4/14/2021 1:02 PM



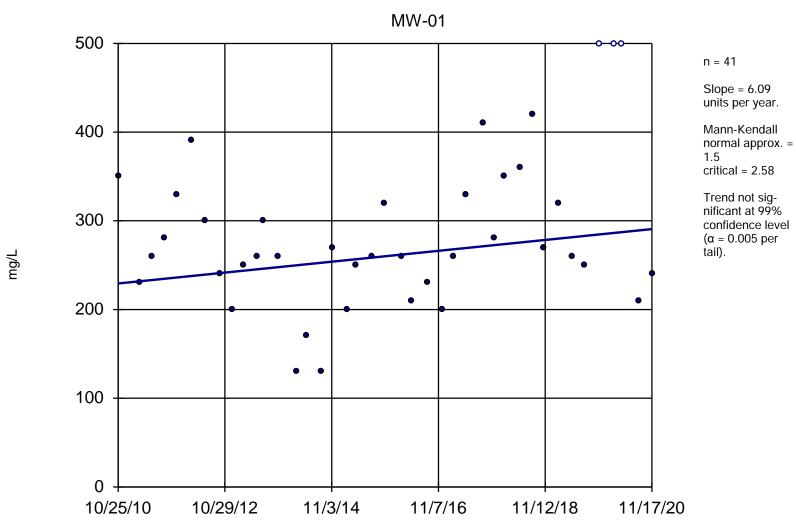
Constituent: Selenium, Total Analysis Run 4/14/2021 1:02 PM



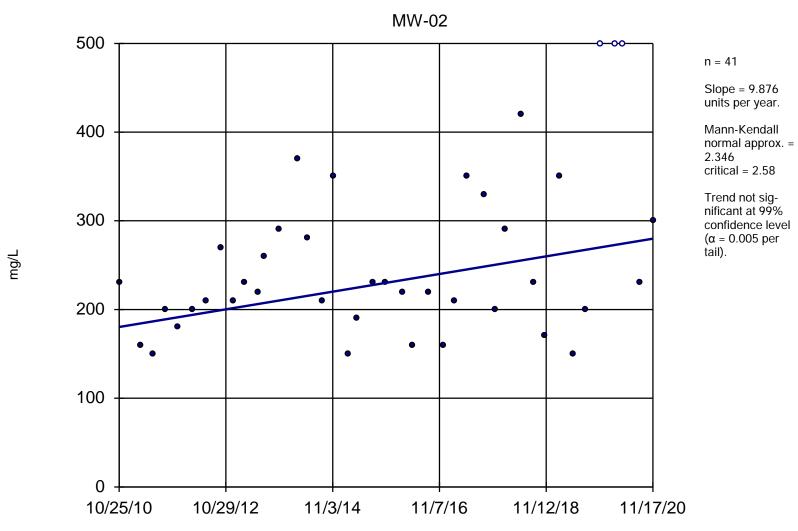
Constituent: Selenium, Total Analysis Run 4/14/2021 1:02 PM



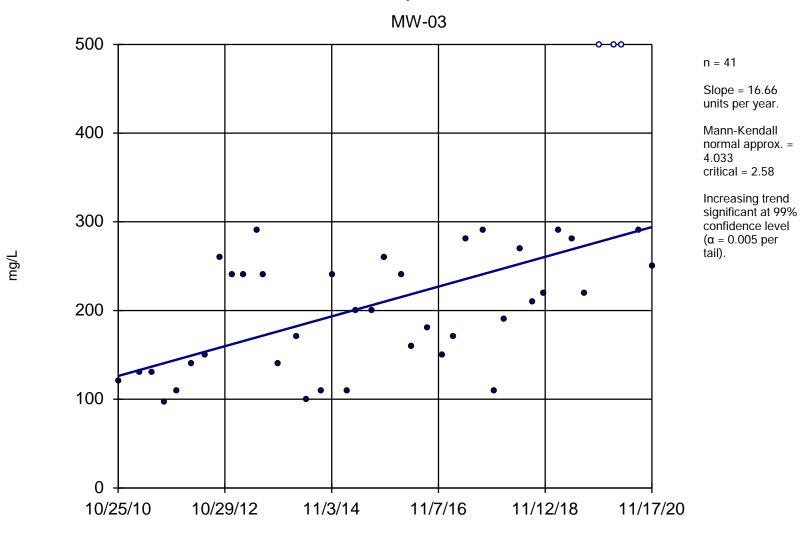
Constituent: Selenium, Total Analysis Run 4/14/2021 1:02 PM



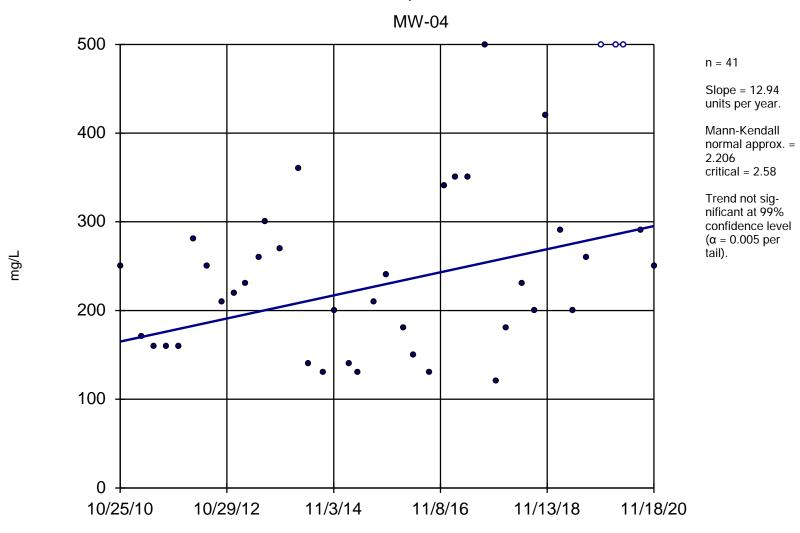
Constituent: Sulfate Analysis Run 4/14/2021 1:02 PM



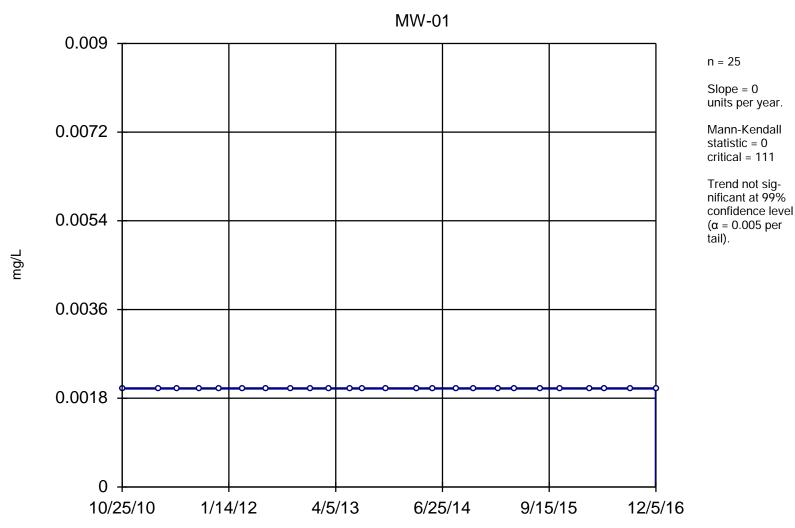
Constituent: Sulfate Analysis Run 4/14/2021 1:02 PM



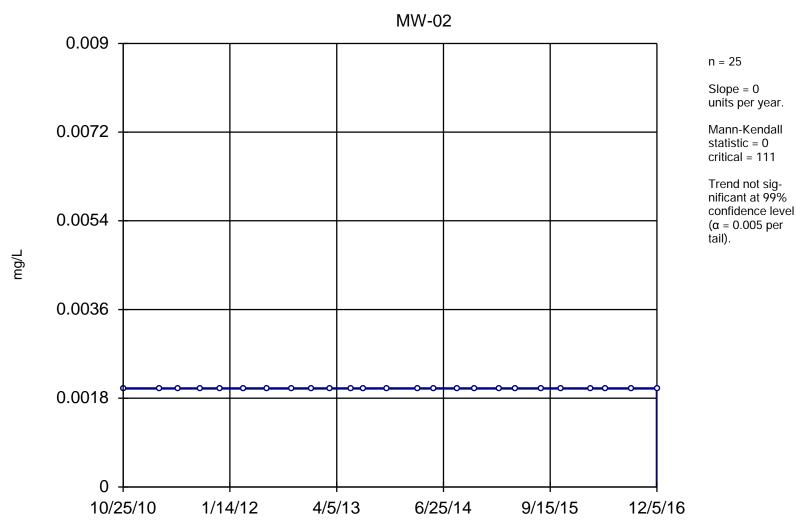
Constituent: Sulfate Analysis Run 4/14/2021 1:02 PM



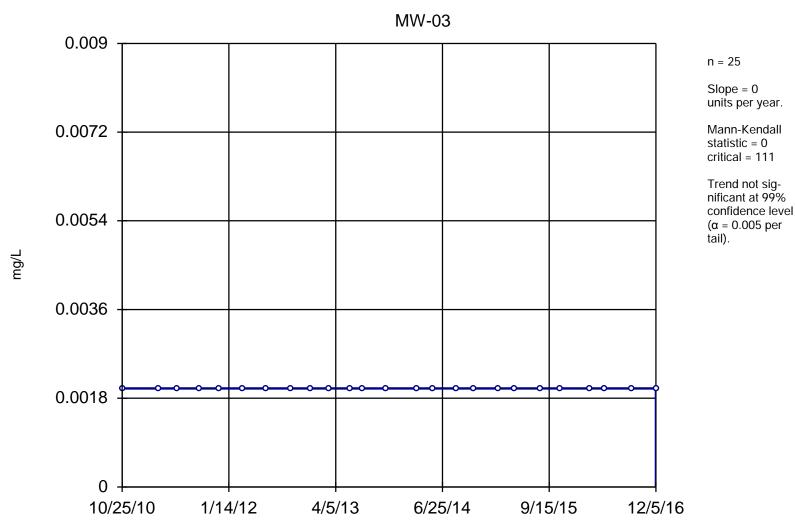
Constituent: Sulfate Analysis Run 4/14/2021 1:02 PM



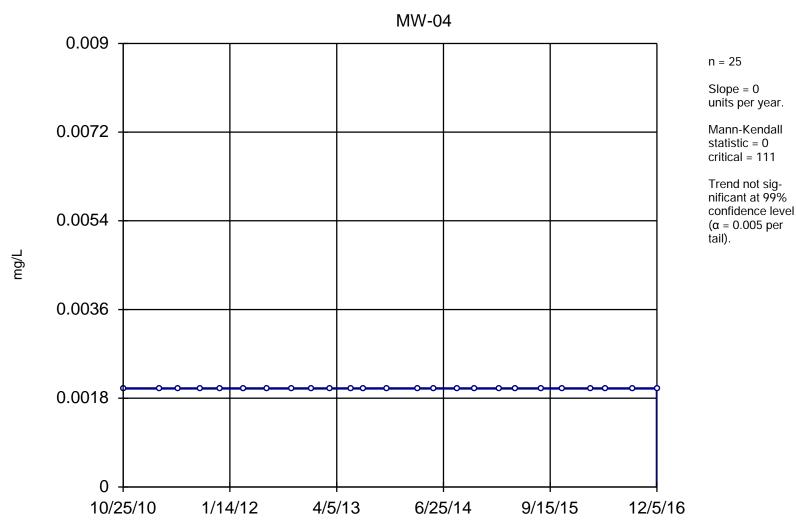
Constituent: Thallium, Dissolved Analysis Run 4/14/2021 1:02 PM



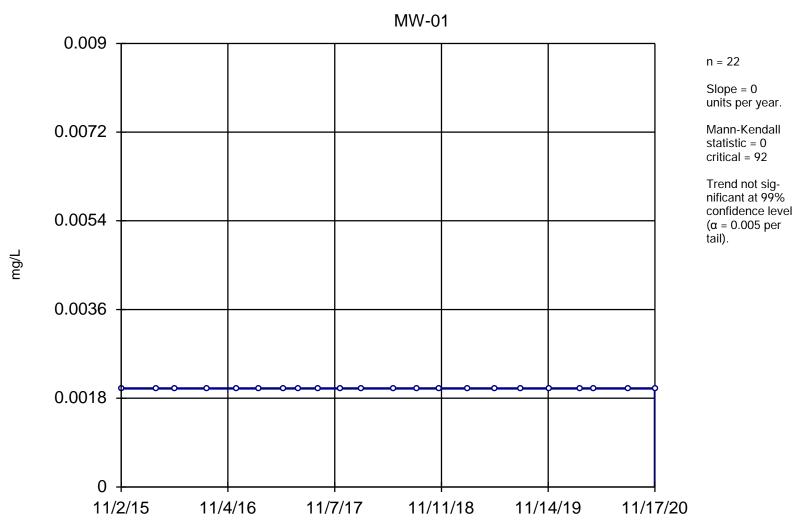
Constituent: Thallium, Dissolved Analysis Run 4/14/2021 1:02 PM



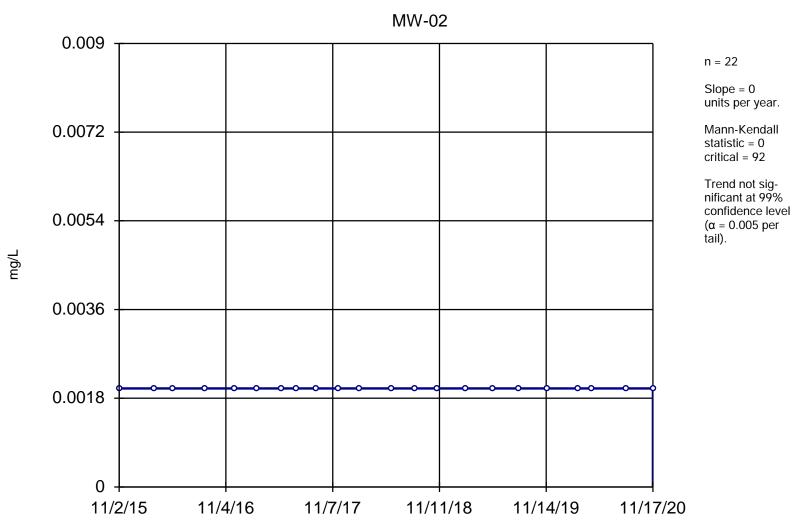
Constituent: Thallium, Dissolved Analysis Run 4/14/2021 1:02 PM



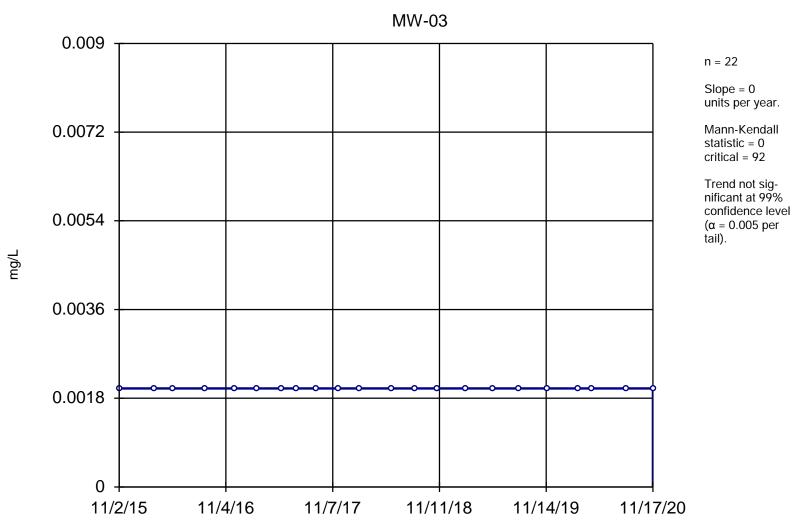
Constituent: Thallium, Dissolved Analysis Run 4/14/2021 1:02 PM



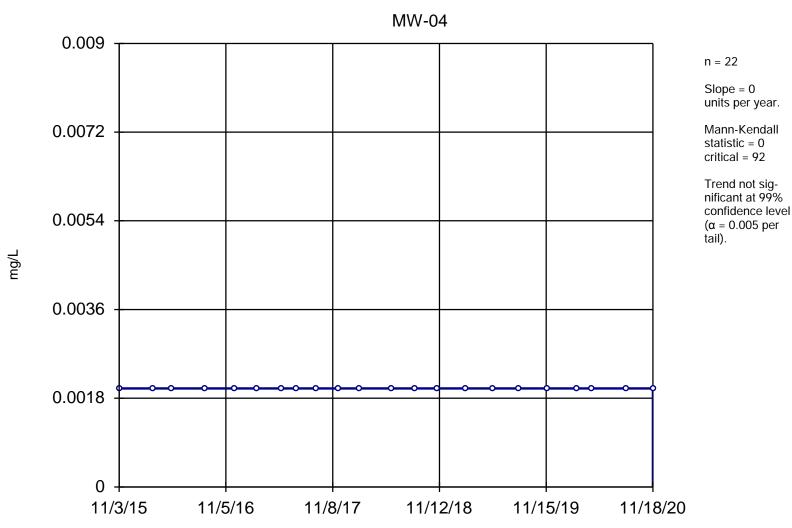
Constituent: Thallium, Total Analysis Run 4/14/2021 1:02 PM



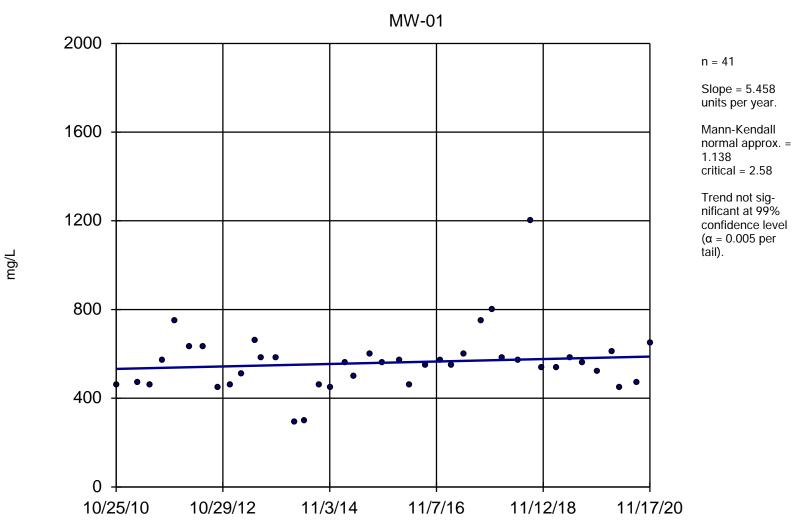
Constituent: Thallium, Total Analysis Run 4/14/2021 1:02 PM



Constituent: Thallium, Total Analysis Run 4/14/2021 1:02 PM

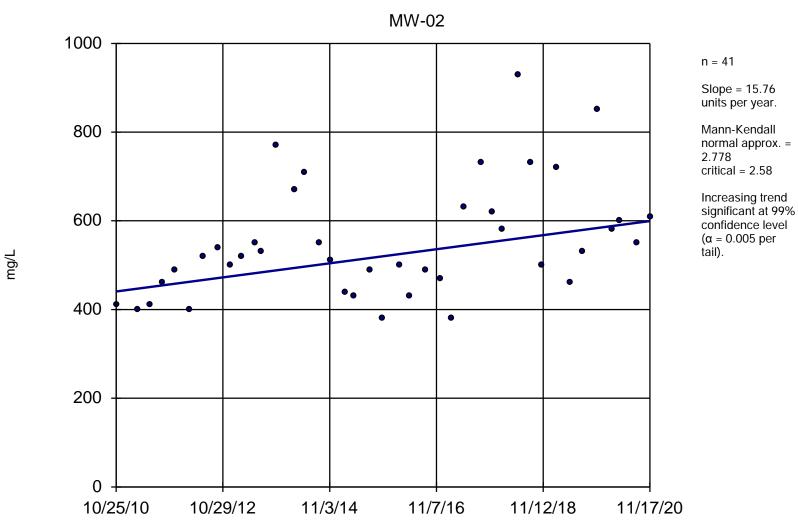


Constituent: Thallium, Total Analysis Run 4/14/2021 1:02 PM



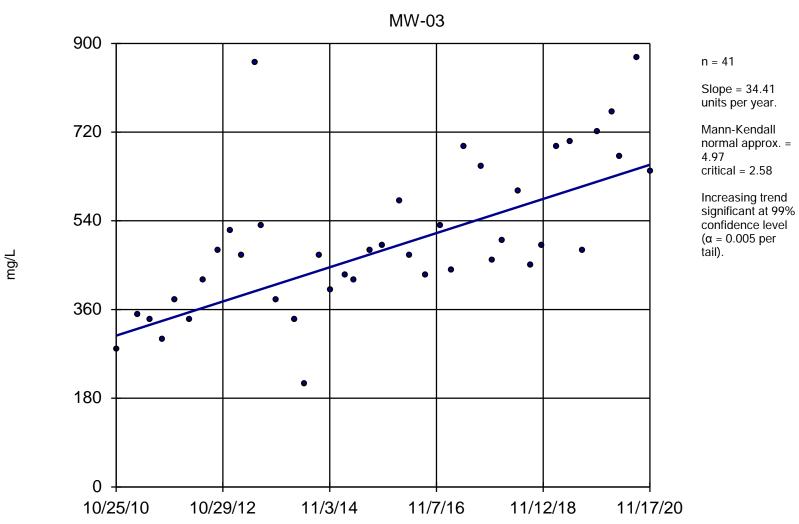
Constituent: Total Dissolved Solids Analysis Run 4/14/2021 1:02 PM
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database

### Sen's Slope Estimator



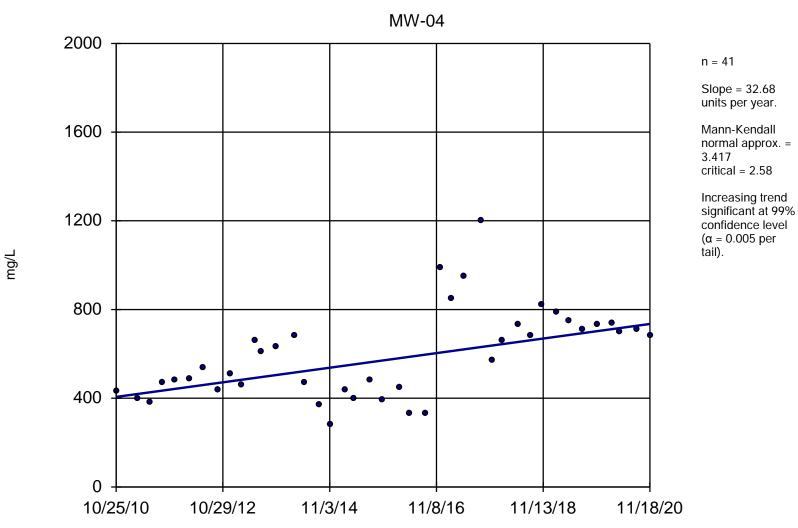
Constituent: Total Dissolved Solids Analysis Run 4/14/2021 1:03 PM
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database

### Sen's Slope Estimator



Constituent: Total Dissolved Solids Analysis Run 4/14/2021 1:03 PM
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database

### Sen's Slope Estimator



Constituent: Total Dissolved Solids Analysis Run 4/14/2021 1:03 PM
Utility Site W Client: Weaver Consultants Group Data: Waukegan Sanitas Database

## Appendix D

Comparison of Groundwater Concentrations to Surface
Water Standards

#### Surface Water Standards **Midwest Generation**

			Surface Water Standards (1)							
Constituent	CAS	Units		ıl Use (2)		Lake Michigan Basin (3)				
			Chronic		Acute (4)	)	Chronic	Chronic Acute (4)		
Antimony	7440-36-0	mg/L	0.32	(2e)	1.2	(2e)				
Arsenic	7440-38-2	mg/L	0.19	(2a)	0.36	(2a)	0.148	(3a)	0.34	(3a)
Barium	7440-39-3	mg/L	5.0	(2b)	-		5.0	(3b)		
Beryllium	7440-41-7	mg/L			-					
Boron	7440-42-8	mg/L	7.6	(2a)	40.1	(2a)	7.6	(3a)	40.1	(3a)
Cadmium	7440-43-9	mg/L	0.0017	(2a,i)	0.0195	(2a,i)	0.0037		0.0091	
Calcium	7440-70-2	mg/L								
Chloride	16887-00-6	mg/L	500	(2b)			500	(3b)		
Chromium	7440-47-3	mg/L	0.13	(2a,ii)	1.0	(2a,ii)	0.011		0.016	
Cobalt	7440-48-4	mg/L								
Fluoride	16984-48-8	mg/L	4.0	(2a,iii)	14.6	(2a,iii)	4.0		14.6	
Lead	7439-92-1	mg/L	0.033	(2a,iv)	0.160	(2a,iv)	0.011		0.204	
Lithium	7439-93-2	mg/L								
Mercury, dissolved	7439-97-6	mg/L	0.0011	(2a)	0.0022					
Mercury, total	7439-97-6	mg/L	0.000012	(2f)			0.00091	(3d)	0.0017	(3d)
Molybdenum	7439-98-7	mg/L			-					
pH		s.u.	6.5 - 9.0	(2d)			6.5 - 9.0	(3c)		
Radium 226 + 228	7440-14-4	pCi/L	3.75	(2a)	-		3.75			
Selenium	7782-49-2	mg/L	1.0				5.0	(3a)	n/a	
Sulfate	18785-72-3	mg/L	site-specific	(2c)			500	(3b)		
Joliet	18785-72-3	mg/L	1360	(2c)			500	(3b)		
Powerton	18785-72-3	mg/L	1440	(2c)			500	(3b)		
Waukegan	18785-72-3	mg/L	1440	(2c)	-		500	(3b)		
Will County	18785-72-3	mg/L	1460	(2c)	-		500	(3b)		
Thallium	7440-28-0	mg/L	0.003	(2f)	0.086	(2e)	n/a		n/a	
Total Dissolved Solids		mg/L					1,000	(3b)		

- (1) IL Water Quality Standards (WQS) used as surface water standard for evaluating hypothetical human/ecological exposure scenarios. In the absence of WQS, IL Water Quality Criteria (WQC) are
- (2) Concentration represents an Illinois General Use WQS as defined in 35 IAC 302, Subpart B or an Illinois Derived WQC (lower of aquatic life and human health WQC):
- (a) 35 IAC 302.208(e), Numerical Water Quality Standards for the Protection of Aquatic Life
- (i) Standard for dissolved cadmium is a hardness (H)-dependent value, calculated as follows (see also footnote 5):

Chronic =  $\exp[-3.490+0.7852*ln(H)]*(1.101672-[ln(H)(0.041383])*1E-3 mg/µg$ Acute =  $\exp[-2.918+1.128*ln(H)]*(1.138672-[ln(H)(0.041383])*1E-3 mg/µg$ 

(ii) Standard for chromium is a hardness (H)-dependent value, calculated as follows (see also footnote 5):

Chronic =  $\exp[0.6848+0.8190*\ln(H)]*0.860*1E-3 mg/\mu g$ 

Acute =  $\exp[3.7256+0.8190*ln(H)]*0.316*1E-3 mg/\mu g$ 

(iii) Standard for fluoride is a hardness (H)-dependent value, calculated as follows (see also footnote 5):

Chronic = exp[6.0445+0.5394\*ln(H)]\*1E-3 mg/µg, but shall not exceed 4.0 mg/L

Acute =  $\exp[6.7319+0.5394*ln(H)]*1E-3 mg/\mu g$ 

(iv) Standard for lead is a hardness (H)-dependent value, calculated as follows (see also footnote 5):

Chronic =  $\exp[-2.863+1.273*\ln(H)]*\{1.46203-[(\ln(H))(0.145712)]\}*1E-3 \text{ mg/}\mu\text{g}$ 

 $Acute = exp[-1.301 + 1.273*ln(H)]*\{1.46203 - [(ln(H))(0.145712)]\}*1E-3 mg/\mu g$ 

- (b) 35 IAC 302.208(g), Single-Value Standards
- (c) 35 IAC 302.208(h)(2)(A), WQS for Sulfate; standard is hardness (H) and chloride (Cl) dependent, and calculated as follows (see also footnotes 5 and 6): Chronic = exp[1276.7+5.508\*(H)-1.457(Cl)]\*0.65
- (d) 35 IAC 302.204, pH
- (e) Illinois WQC for the protection of aquatic life.
- (f) Illinois WQC for the protection of human health (applicable to chronic values only).
- (3) Concentration represents an Illinois Lake Michigan Basin WQS as defined in 35 IAC 302, Subpart E. Note that of the four subject sites,

Lake Michigan Basin WQS are only applicable to the Waukegan Station.

- (a) 35 IAC 302.504(a), Lake Michigan Basin Water Quality Standards for Chemical Constituents.
- (b) 35 IAC 302.504(b)
- (c) IAC 302.503, pH
- (d) 35 IAC 302.504(e)
- (4) Chronic values are used as the primary effects values for this evaluation; however, acute values are also presented for completeness.
- (5) Site-specific hardness data is not available. Based on data from the IL Water Quality Database (http://ilrdss.isws.illinois.edu/WQ/), a value of 200 mg/L is . considered a conservative estimate for the Site
- (6) Sulfate WQS calculated using the average chloride concentration for available data, which are as follows:

Joliet 201 mg/L Powerton 115.4 mg/L Waukegan 115.8 mg/L Will County 92.7 mg/L

#### Definitions

- "--" = value not available n/a = not applicable
- mg/L = milligrams per liter s.u. = standard unit

### Comparison of Downgradient Average Groundwater Analytical Results to Surface Water Standards Joliet 29 Station

a 1	TT *	Surface Water	Groundwater Analytical Results - Average Concentrations							
Constituent <sup>1</sup>	Units	Standard <sup>2</sup>	MW-01	MW-02	MW-03	MW-04	MW-06	MW-07		
Antimony, Dissolved	mg/L	0.32	< 0.003	< 0.003	< 0.003	< 0.003	< 0.003	< 0.003		
Antimony, Total	mg/L	0.32			< 0.003	< 0.003				
Arsenic, Dissolved	mg/L	0.19	0.001	0.001	0.001	0.001	0.001	0.001		
Arsenic, Total	mg/L	0.19			0.001	0.001				
Barium, Dissolved	mg/L	5	0.109	0.096	0.094	0.082	0.123	0.116		
Barium, Total	mg/L	5			0.095	0.086				
Beryllium, Dissolved	mg/L	N/A	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001		
Beryllium, Total	mg/L	N/A			< 0.001	< 0.001				
Boron, Dissolved	mg/L	7.6	0.254	0.257	0.379	0.379	0.244	0.241		
Boron, Total	mg/L	7.6			0.422	0.379				
Cadmium, Dissolved	mg/L	0.0017	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0006		
Cadmium, Total	mg/L	0.0017			< 0.0005	< 0.0005				
Calcium, Total	mg/L	N/A			97.4	99.3				
Chloride	mg/L	500	155	225	222	214	185	195		
Chromium, Dissolved	mg/L	0.13	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005		
Chromium, Total	mg/L	0.13			< 0.005	< 0.009				
Cobalt, Dissolved	mg/L	N/A	< 0.001	< 0.001	< 0.001	0.004	< 0.001	< 0.001		
Cobalt, Total	mg/L	N/A			< 0.001	0.008				
Fluoride	mg/L	4	0.41	0.45	0.43	0.45	0.35	0.31		
Lead, Dissolved	mg/L	0.03	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0007		
Lead, Total	mg/L	0.03			< 0.0005	0.0006				
Lithium, Total	mg/L	N/A			0.0115	0.0124				
Mercury, Dissolved	mg/L	0.0011	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002		
Mercury, Total	mg/L	0.000012			< 0.0002	< 0.0002				
Molybdenum, Total	mg/L	N/A			0.0066	0.0076				
pH, Field	S.U.	6.5 - 9.0	7.17	7.33	7.32	7.32	7.51	7.49		
Radium 226 + 228, Combined	pCi/L	3.75			0.432	0.413				
Selenium, Dissolved	mg/L	1.0	0.006	0.003	0.004	< 0.003				
Selenium, Total	mg/L	1.0			0.004	< 0.003				
Sulfate	mg/L	1360*	109	97	121	118	112	123		
Thallium, Dissolved	mg/L	0.003	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002		
Thallium, Total	mg/L	0.003			< 0.002	< 0.002				
Total Dissolved Solids	mg/L	N/A	702	792	883	847	736	762		

Exceeds Surface Water Standard

Average concentrations between December 2010 and October 2020 as calculated by Sanitas<sup>TM</sup> Software

<sup>&</sup>quot;<" = Constituent non-detect in 75% or more samples; reporting limit presented as average.

<sup>&</sup>quot;--" = Constituent not analyzed

<sup>&</sup>lt;sup>1</sup>Constituents analyzed are coal-combustion residual (CCR) constituents as identified in Appendices III and IV to 40 CFR Part 257.

<sup>&</sup>lt;sup>2</sup> Surface Water Standard values obtained from the Illinois General Use Water Quality Standards (WQS) as defined in 35 IAC 302, Subpart B or, in the absence of Illinois WQS, the Illinois Water Quality Criteria (WQC) as shown in Table 1.

<sup>\*</sup>Site-specific Water Quality Standard for Sulfate per 35 IAC 302.208(h)(2)(A); standard is hardness (H) and chloride (Cl) dependent, and calculated as follows =exp[1276.7+5.508\*(H)-1.457(Cl)]\*0.65

#### Comparison of Downgradient Average Groundwater Analytical Results to Surface Water Standards Powerton Station

1		Surface Water	ater Groundwater Analytical Results - Average Concentrations									
Constituent <sup>1</sup>	Units	Standard <sup>2</sup>	MW-03	MW-04	MW-05	MW-06	MW-07	MW-08	MW-13	MW-14	MW-15	
Antimony, Dissolved	mg/L	0.32	< 0.003	< 0.003	< 0.003	< 0.003	< 0.003	< 0.003	< 0.003	< 0.003	< 0.003	
Antimony, Total	mg/L	0.32	< 0.003	< 0.003	< 0.003			< 0.003			< 0.003	
Arsenic, Dissolved	mg/L	0.19	0.001	0.001	0.001	0.007	0.161	0.002	0.024	0.003	0.003	
Arsenic, Total	mg/L	0.19	0.001	< 0.001	< 0.001			0.003			0.021	
Barium, Dissolved	mg/L	5	0.060	0.038	0.057	0.103	0.471	0.106	0.163	0.051	0.072	
Barium, Total	mg/L	5	0.064	0.035	0.054			0.103			0.065	
Beryllium, Dissolved	mg/L	N/A	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	
Beryllium, Total	mg/L	N/A	< 0.001	< 0.001	< 0.001			< 0.001			< 0.001	
Boron, Dissolved	mg/L	7.6	0.373	0.667	1.485	0.474	1.664	0.889	3.022	1.924	1.562	
Boron, Total	mg/L	7.6	0.318	0.596	0.633			1.129			1.793	
Cadmium, Dissolved	mg/L	0.0017	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	0.0006	< 0.0005	
Cadmium, Total	mg/L	0.0017	< 0.0005	< 0.0005	< 0.0005			< 0.0005			0.0007	
Calcium, Total	mg/L	N/A	78	88	104			138			198	
Chloride	mg/L	500	55	69	99	178	153	222	162	165	193	
Chromium, Dissolved	mg/L	0.13	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	
Chromium, Total	mg/L	0.13	< 0.005	< 0.005	< 0.005			< 0.005			< 0.005	
Cobalt, Dissolved	mg/L	N/A	< 0.001	< 0.001	< 0.001	< 0.001	0.006	< 0.001	< 0.001	< 0.001	< 0.001	
Cobalt, Total	mg/L	N/A	< 0.001	< 0.001	< 0.001			< 0.001			< 0.001	
Fluoride	mg/L	4	0.280	0.283	0.304	0.508	0.443	0.492	0.352	0.996	0.598	
Lead, Dissolved	mg/L	0.03	< 0.0005	< 0.0005	< 0.0005	< 0.0005	0.0007	< 0.0005	< 0.0005	< 0.0005	< 0.0005	
Lead, Total	mg/L	0.03	< 0.0005	< 0.0005	< 0.0005			0.0006			< 0.0005	
Lithium, Total	mg/L	N/A	< 0.01	< 0.01	< 0.01			0.02			0.03	
Mercury, Dissolved	mg/L	0.0011	< 0.0002	< 0.0002	< 0.0002			< 0.0002			< 0.0002	
Mercury, Total	mg/L	0.000012	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	
Molybdenum, Total	mg/L	N/A	< 0.005	0.006	0.006			0.017			0.027	
pH, Field	S.U.	6.5 - 9.0	7.33	7.18	7.11	7.62	6.81	7.61	7.73	7.13	7.11	
Radium 226 + 228, Com	b pCi/L	3.75	0.516	0.507	0.456			0.539			0.459	
Selenium, Dissolved	mg/L	1	0.003	0.003	0.003	0.003	0.004	0.003	0.007	0.011	0.018	
Selenium, Total	mg/L	1	< 0.0025	0.0032	< 0.0025			< 0.0025			0.0184	
Sulfate	mg/L	1440*	62	108	177	367	67	243	1,187	946	513	
Thallium, Dissolved	mg/L	0.003	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	0.003	< 0.001	
Thallium, Total	mg/L	0.003	< 0.001	< 0.001	< 0.001			< 0.001			< 0.001	
Total Dissolved Solids	mg/L	N/A	438	580	765	1,113	1,205	1,089	2,449	2,192	1,553	

Exceeds Surface Water Standard

Average concentrations between March 2011 and December 2020 as calculated by Sanitas TM Software

<sup>&</sup>quot;<" = Constituent non-detect in 75% or more samples; reporting limit presented as average.

<sup>&</sup>quot;--" = Constituent not analyzed

<sup>&</sup>lt;sup>1</sup>Constituents analyzed are coal-combustion residual (CCR) constituents as identified in Appendices III and IV to 40 CFR Part 257.

<sup>&</sup>lt;sup>2</sup> Surface Water Standard values obtained from the Illinois General Use Water Quality Standards (WQS) as defined in 35 IAC 302, Subpart B or, in the absence of Illinois WQS, the Illinois Water Quality Criteria (WQC) as shown in **Table 1**.

<sup>\*</sup>Site-specific Water Quality Standard for Sulfate per 35 IAC 302.208(h)(2)(A); standard is hardness (H) and chloride (Cl) dependent, and calculated as follows =exp[1276.7+5.508\*(H)-1.457(Cl)]\*0.65

### Comparison of Downgradient Average Groundwater Analytical Results to Surface Water Standards Will Co. Station

		Surface Water			Groundwater Analytical Re	esults - Average Concentrations		
Constituent <sup>1</sup>	Units	Standard <sup>2</sup>	MW-07	MW-08	MW-09	MW-10	MW-11	MW-12
Antimony, Dissolved	mg/L	0.32	< 0.003	<0.003	< 0.003	< 0.003		
Antimony, Total	mg/L	0.32			< 0.003	< 0.003	<0.003	<0.003
Arsenic, Dissolved	mg/L	0.19	0.003	0.007	0.005	0.008		
Arsenic, Total	mg/L	0.19			0.005	0.020	0.008	0.002
Barium, Dissolved	mg/L	5	0.057	0.076	0.028	0.094		
Barium, Total	mg/L	5			0.039	0.105	0.118	0.109
Beryllium, Dissolved	mg/L	N/A	< 0.001	<0.001	< 0.001	< 0.001		
Beryllium, Total	mg/L	N/A			< 0.001	<0.001	<0.001	<0.001
Boron, Dissolved	mg/L	7.6	3.97	2.38	1.75	2.92		
Boron, Total	mg/L	7.6			1.91	3.32	2.93	2.15
Cadmium, Dissolved	mg/L	0.001720142	< 0.0005	<0.0005	<0.0005	<0.0005		
Cadmium, Total	mg/L	0.001720142			<0.0005	<0.0005	<0.0005	<0.0005
Calcium, Total	mg/L	N/A			59	133	95	152
Chloride	mg/L	500	149	146	214	128	94	167
Chromium, Dissolved	mg/L	0.13	< 0.005	<0.005	<0.005	< 0.005		
Chromium, Total	mg/L	0.13			<0.005	<0.005	<0.005	<0.005
Cobalt, Dissolved	mg/L	N/A	< 0.001	0.001	< 0.001	<0.001		
Cobalt, Total	mg/L	N/A			< 0.001	< 0.001	<0.001	<0.001
Fluoride	mg/L	4	0.750	0.563	0.457	0.713	0.612	0.478
Lead, Dissolved	mg/L	0.03	< 0.0005	<0.0005	<0.0005	<0.0005		
Lead, Total	mg/L	0.03			0.0006	0.0006	0.0005	0.0005
Lithium, Total	mg/L	N/A			0.01	0.02	0.01	0.01
Mercury, Dissolved	mg/L	0.0011	< 0.002	<0.002	<0.002	<0.002		
Mercury, Total	mg/L	0.000012			<0.002	<0.002	<0.002	<0.002
Molybdenum, Total	mg/L	N/A			0.096	0.066	0.071	0.040
pH, Field	S.U.	6.5 - 9.0	7.90	7.18	9.22	7.43		
Radium 226 + 228, Comb	pCi/L	3.75			0.429	0.819	0.832	0.514
Selenium, Dissolved	mg/L	1	0.0047	0.0048	0.0030	0.0030		
Selenium, Total	mg/L	1			0.0029	<0.0025	<0.0025	0.0047
Sulfate	mg/L	1460*	565	486	278	292	135	214
Thallium, Dissolved	mg/L	0.003	< 0.002	<0.002	<0.002	<0.002		
Thallium, Total	mg/L	0.003			<0.002	<0.002	<0.002	<0.002
Total Dissolved Solids	mg/L	N/A	1,287	1,253	793	966	645	1,051

Exceeds Surface Water Standard

Average concentrations between December 2010 and November 2020 as calculated by Sanitas<sup>TM</sup> Software

<sup>&</sup>quot;<" = Constituent non-detect in 75% or more samples; reporting limit presented as average.

<sup>&</sup>quot;--" = Constituent not analyzed

<sup>&</sup>lt;sup>1</sup>Constituents analyzed are coal-combustion residual (CCR) constituents as identified in Appendices III and IV to 40 CFR Part 257.

<sup>&</sup>lt;sup>2</sup> Surface Water Standard values obtained from the Illinois General Use Water Quality Standards (WQS) as defined in 35 IAC 302, Subpart B or, in the absence of Illinois WQS, the Illinois Water Quality Criteria (WQC) as shown in **Table 1**.

### Comparison of Downgradient Average Groundwater Analytical Results to Surface Water Standards Waukegan Station

Constituent <sup>1</sup>	Units	Surface Water Standard <sup>2</sup>	Groundwater Analytical Results - Average Concentrations							
Constituent		Surface Water Standard	MW-01	MW-02	MW-03	MW-04				
Antimony, Dissolved	mg/L	0.32	< 0.003	< 0.003	< 0.003	< 0.003				
Antimony, Total	mg/L	0.32	< 0.003	< 0.003	< 0.003	< 0.003				
Arsenic, Dissolved	mg/L	0.148	0.078	0.012	0.004	0.007				
arsenic, Total	mg/L	0.148	0.076	0.011	0.001	0.010				
arium, Dissolved	mg/L	5	0.027	0.024	0.012	0.038				
Barium, Total	mg/L	5	0.032	0.026	0.020	0.056				
eryllium, Dissolved	mg/L	N/A	< 0.001	< 0.001	< 0.001	< 0.001				
eryllium, Total	mg/L	N/A	< 0.001	< 0.001	< 0.001	< 0.001				
oron, Dissolved	mg/L	7.6	2.11	2.50	1.86	2.81				
oron, Total	mg/L	7.6	2.49	3.49	3.09	2.91				
admium, Dissolved	mg/L	0.0037	< 0.0005	< 0.0005	< 0.0005	< 0.0005				
admium, Total	mg/L	0.0037	< 0.0005	< 0.0005	< 0.0005	< 0.0005				
hloride	mg/L	500	49	48	51	46				
hromium, Dissolved	mg/L	0.011	< 0.005	< 0.005	< 0.005	< 0.005				
hromium, Total	mg/L	0.011	< 0.005	< 0.005	< 0.005	< 0.005				
obalt, Dissolved	mg/L	N/A	< 0.001	< 0.001	< 0.001	< 0.001				
obalt, Total	mg/L	N/A	< 0.001	< 0.001	< 0.001	< 0.001				
luoride	mg/L	4	0.338	0.837	0.514	0.550				
ead, Dissolved	mg/L	0.011	< 0.0005	< 0.0005	< 0.0005	< 0.0005				
ead, Total	mg/L	0.011	< 0.0005	< 0.0005	< 0.0005	< 0.0005				
ithium, Total	mg/L	N/A		0.01 U	0.01 U	0.01 U				
fercury, Dissolved	mg/L	0.0000031	< 0.0002	< 0.0002	< 0.0002	< 0.0002				
Iercury, Total	mg/L	0.00091	< 0.0002	< 0.0002	< 0.0002	< 0.0002				
folybdenum, Total	mg/L	N/A	0.057	0.059	0.050	0.032				
H, Field	S.U.	6.5 - 9.0	9.74	8.24	7.87	7.49				
adium-226	pCi/L	3.75	0.140	0.143	0.147					
adium-228	pCi/L	3.75	0.438	0.470	0.446	0.505				
elenium, Dissolved	mg/L	5	0.0193	0.0071	0.0099	0.0093				
elenium, Total	mg/L	5	0.0048	0.0051	0.0054	0.0110				
ulfate	mg/L	500	286	256	219	254				
hallium, Dissolved	mg/L	N/A	< 0.002	< 0.002	< 0.002	< 0.002				
hallium, Total	mg/L	N/A	< 0.002	< 0.002	< 0.002	< 0.002				
otal Dissolved Solids	mg/L	1000	562	551	505	595				

Exceeds Surface Water Standard

Average concentrations between October 2010 and November 2020 as calculated by Sanitas<sup>TM</sup> Software

<sup>&</sup>quot;<" = Constituent non-detect in 75% or more samples; reporting limit presented as average.

<sup>&</sup>quot;--" = Constituent not analyzed

<sup>&</sup>lt;sup>1</sup>Constituents analyzed are coal-combustion residual (CCR) constituents as identified in Appendices III and IV to 40 CFR Part 257.

<sup>&</sup>lt;sup>2</sup> Surface Water Standard values obtained from the Illinois General Use Water Quality Standards (WQS) as defined in 35 IAC 302, Subpart B or, in the absence of Illinois WQS, the Illinois Water Quality Criteria (WQC) as shown in **Table 1**.

Appendix E
HELP Model

\* \* \* \* \* \* \* HYDROLOGIC EVALUATION OF LANDFILL PERFORMANCE HELP MODEL VERSION 3.07 (1 NOVEMBER 1997) \* \* \* \* DEVELOPED BY ENVIRONMENTAL LABORATORY \* \* \* \* USAE WATERWAYS EXPERIMENT STATION FOR USEPA RISK REDUCTION ENGINEERING LABORATORY \* \* \*

PRECIPITATION DATA FILE: C:Waukegan\PREC30.D4
TEMPERATURE DATA FILE: C:Waukegan\TEMP30.D7
SOLAR RADIATION DATA FILE: C:Waukegan\SOLAR30.D13
EVAPOTRANSPIRATION DATA: C:Waukegan\EVAP30.D11
SOIL AND DESIGN DATA FILE: C:Waukegan\BASE\_3.D10
OUTPUT DATA FILE: C:Waukegan\BASE\_3.OUT

TIME: 10:57 DATE: 4/6/2021

\*

TITLE: Midwest Generation (Waukegan) - Base Cond. - 1"/1" Soil

\*

NOTE: INITIAL MOISTURE CONTENT OF THE LAYERS AND SNOW WATER WERE COMPUTED AS NEARLY STEADY-STATE VALUES BY THE PROGRAM.

#### LAYER 1

# TYPE 1 - VERTICAL PERCOLATION LAYER MATERIAL TEXTURE NUMBER 9

THICKNESS = 1.00 INCHES

POROSITY = 0.5010 VOL/VOL

FIELD CAPACITY = 0.2840 VOL/VOL

WILTING POINT = 0.1350 VOL/VOL

INITIAL SOIL WATER CONTENT = 0.4648 VOL/VOL

EFFECTIVE SAT. HYD. COND. = 0.190000006000E-03 CM/SEC NOTE: SATURATED HYDRAULIC CONDUCTIVITY IS MULTIPLIED BY 4.63

FOR ROOT CHANNELS IN TOP HALF OF EVAPORATIVE ZONE.

### LAYER 2

## TYPE 3 - BARRIER SOIL LINER MATERIAL TEXTURE NUMBER 9

THICKNESS	=	1.00 INCHES
POROSITY	=	0.5010 VOL/VOL
FIELD CAPACITY	=	0.2840 VOL/VOL
WILTING POINT	=	0.1350 VOL/VOL
INITIAL SOIL WATER CONTENT	=	0.5010 VOL/VOL
EFFECTIVE SAT. HYD. COND.	=	0.190000006000E-03 CM/SEC

### LAYER 3

# TYPE 1 - VERTICAL PERCOLATION LAYER MATERIAL TEXTURE NUMBER 31

THICKNESS	=	120.00 INCHES
POROSITY	=	0.5780 VOL/VOL
FIELD CAPACITY	=	0.0760 VOL/VOL
WILTING POINT	=	0.0250 VOL/VOL
INITIAL SOIL WATER CONTENT	=	0.1966 VOL/VOL
EFFECTIVE SAT. HYD. COND.	=	0.410000002000E-02 CM/SEC

## GENERAL DESIGN AND EVAPORATIVE ZONE DATA

NOTE: SCS RUNOFF CURVE NUMBER WAS COMPUTED FROM DEFAULT SOIL DATA BASE USING SOIL TEXTURE # 9 WITH A GOOD STAND OF GRASS, A SURFACE SLOPE OF 1.% AND A SLOPE LENGTH OF 500. FEET.

SCS RUNOFF CURVE NUMBER	=	74.30	
FRACTION OF AREA ALLOWING RUNOFF	=	100.0	PERCENT
AREA PROJECTED ON HORIZONTAL PLANE	=	1.000	ACRES
EVAPORATIVE ZONE DEPTH	=	1.0	INCHES
INITIAL WATER IN EVAPORATIVE ZONE	=	0.465	INCHES
UPPER LIMIT OF EVAPORATIVE STORAGE	=	0.501	INCHES
LOWER LIMIT OF EVAPORATIVE STORAGE	=	0.135	INCHES
INITIAL SNOW WATER	=	0.000	INCHES
INITIAL WATER IN LAYER MATERIALS	=	24.555	INCHES
TOTAL INITIAL WATER	=	24.555	INCHES
TOTAL SUBSURFACE INFLOW	=	0.00	INCHES/YEAR

#### EVAPOTRANSPIRATION AND WEATHER DATA

NOTE: EVAPOTRANSPIRATION DATA WAS OBTAINED FROM CHICAGO ILLINOIS

STATION LATITUDE		=	41.78	DEGREES
MAXIMUM LEAF AREA INDEX		=	3.50	
START OF GROWING SEASON	(JULIAN DA	TE) =	117	

START OF GROWING SEASON (JULIAN DATE) = 117 END OF GROWING SEASON (JULIAN DATE) = 290

EVAPORATIVE ZONE DEPTH = 1.0 INCHES

AVERAGE ANNUAL WIND SPEED = 10.30 MPH

AVERAGE 1ST QUARTER RELATIVE HUMIDITY = 71.00 %

AVERAGE 2ND QUARTER RELATIVE HUMIDITY = 65.00 %

AVERAGE 3RD QUARTER RELATIVE HUMIDITY = 70.00 %

AVERAGE 4TH QUARTER RELATIVE HUMIDITY = 72.00 %

NOTE: PRECIPITATION DATA WAS SYNTHETICALLY GENERATED USING COEFFICIENTS FOR CHICAGO ILLINOIS

NORMAL MEAN MONTHLY PRECIPITATION (INCHES)

JAN/JUL	FEB/AUG	MAR/SEP	APR/OCT	MAY/NOV	JUN/DEC
1.60	1.31	2.59	3.66	3.15	4.08
3.63	3.53	3.35	2.28	2.06	2.10

NOTE: TEMPERATURE DATA WAS SYNTHETICALLY GENERATED USING COEFFICIENTS FOR CHICAGO ILLINOIS

NORMAL MEAN MONTHLY TEMPERATURE (DEGREES FAHRENHEIT)

JAN/JUL	FEB/AUG	MAR/SEP	APR/OCT	MAY/NOV	JUN/DEC
21.40	26.00	36.00	48.80	59.10	68.60
73.00	71.90	64.70	53.50	39.80	27.70

NOTE: SOLAR RADIATION DATA WAS SYNTHETICALLY GENERATED USING COEFFICIENTS FOR CHICAGO ILLINOIS

AND STATION LATITUDE = 41.78 DEGREES

\*

AVERAGE MONTHLY VALUES IN INCHES FOR YEARS 1 THROUGH 30

	JAN/JUL	FEB/AUG	MAR/SEP	APR/OCT	MAY/NOV	JUN/DEC
PRECIPITATION						
TOTALS	1.47 3.43	1.46 3.42	2.39 3.11	3.26 2.19	3.34 2.10	4.22
STD. DEVIATIONS	0.68 1.83	0.71 1.76	1.18 1.76	1.52 1.22	1.65 1.06	
RUNOFF						
TOTALS	0.413 0.096	1.356 0.111	2.098 0.062	0.305 0.036	0.062 0.023	0.105 0.239
STD. DEVIATIONS	0.596 0.111	0.974 0.179	1.675 0.097	0.517 0.063	0.181 0.051	
EVAPOTRANSPIRATION						
TOTALS	0.534 1.554	0.453 1.347	0.547 1.072	1.427 0.747	1.502 0.704	1.721 0.521
STD. DEVIATIONS	0.111 0.645	0.085 0.604	0.208 0.482	0.556 0.345		
PERCOLATION/LEAKAGE TH	ROUGH LAY	ER 2				
TOTALS	0.0621 1.8055	0.1168 1.9666	0.4469 1.9958			
STD. DEVIATIONS	0.0597 1.3224					
PERCOLATION/LEAKAGE TH	ROUGH LAY	ER 3				
TOTALS	1.3450 1.9459	0.9033 1.8423		0.4399 1.9094		
STD. DEVIATIONS	0.4007 1.4347			0.0877 0.6882		0.7246 0.5352
AVERAGES	OF MONTHL	Y AVERAGE	D DAILY H	EADS (INC	 HES)	
DAILY AVERAGE HEAD ON	TOP OF LA	YER 2				
AVERAGES		0.0028 0.0315		0.0325 0.0266		0.0437 0.0134
STD. DEVIATIONS	0.0034 0.0187	0.0026 0.0186	0.0062 0.0238			

\*\*\*\*\*\*\*\*\*\*\*\*\*

AVERAGE ANNUAL TOTALS & (S	STD. DEVIAT	OI	IS) FOR YEA	RS 1 THROUGH	н 30
	INCH	IES		CU. FEET	PERCENT
PRECIPITATION	32.60	(	5.565)	118325.9	100.00
RUNOFF	4.906	(	2.0599)	17809.38	15.051
EVAPOTRANSPIRATION	12.130	(	2.0324)	44030.22	37.211
PERCOLATION/LEAKAGE THROUGH LAYER 2	15.55042	(	3.57521)	56448.012	47.70554
AVERAGE HEAD ON TOP OF LAYER 2	0.024 (		0.005)		
PERCOLATION/LEAKAGE THROUGH LAYER 3	15.64379	(	3.64652)	56786.945	47.99198
CHANGE IN WATER STORAGE	-0.083	(	1.3175)	-300.65	-0.254
	la da		and the standards of the standards of	also de also	la de

\*\*\*\*\*\*\*\*\*\*\*\*

PEAK DAILY VALUES FOR YEARS	1 THROUGH	30
	(INCHES)	(CU. FT.)
PRECIPITATION	4.09	14846.700
RUNOFF	1.681	6103.1455
PERCOLATION/LEAKAGE THROUGH LAYER 2	3.152224	11442.57130
AVERAGE HEAD ON TOP OF LAYER 2	0.500	
PERCOLATION/LEAKAGE THROUGH LAYER 3	0.405263	1471.10535
SNOW WATER	4.86	17649.8242
MAXIMUM VEG. SOIL WATER (VOL/VOL)	0.0	5010
MINIMUM VEG. SOIL WATER (VOL/VOL)	0.3	L350

* * * * * * * * * * * * * * * * * * * *	*****

FINAL WATER	STORAGE AT EN	D OF YEAR 30
LAYER	(INCHES)	(VOL/VOL)
1	0.4648	0.4648
2	0.5010	0.5010
3	20.7881	0.1732
SNOW WATER	0.316	

\* \* HYDROLOGIC EVALUATION OF LANDFILL PERFORMANCE \* \* \* \* \* \* HELP MODEL VERSION 3.07 (1 NOVEMBER 1997) DEVELOPED BY ENVIRONMENTAL LABORATORY USAE WATERWAYS EXPERIMENT STATION \* \* \* \* FOR USEPA RISK REDUCTION ENGINEERING LABORATORY \* \* \* \* \* \*

PRECIPITATION DATA FILE: C:Waukegan\PREC30.D4
TEMPERATURE DATA FILE: C:Waukegan\TEMP30.D7
SOLAR RADIATION DATA FILE: C:Waukegan\SOLAR30.D13
EVAPOTRANSPIRATION DATA: C:Waukegan\EVAP30.D11
SOIL AND DESIGN DATA FILE: C:Waukegan\CAP\_3A.D10
OUTPUT DATA FILE: C:Waukegan\CAP\_3A.OUT

TIME: 13:47 DATE: 4/ 7/2021

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

TITLE: Midwest Generation (Waukegan) - Cap Cond. - w/ Geomembrane

NOTE: INITIAL MOISTURE CONTENT OF THE LAYERS AND SNOW WATER WERE COMPUTED AS NEARLY STEADY-STATE VALUES BY THE PROGRAM.

#### LAYER 1

## TYPE 1 - VERTICAL PERCOLATION LAYER MATERIAL TEXTURE NUMBER 9

THICKNESS = 6.00 INCHES
POROSITY = 0.5010 VOL/VOL
FIELD CAPACITY = 0.2840 VOL/VOL
WILTING POINT = 0.1350 VOL/VOL
INITIAL SOIL WATER CONTENT = 0.3427 VOL/VOL

EFFECTIVE SAT. HYD. COND. = 0.190000006000E-03 CM/SEC

NOTE: SATURATED HYDRAULIC CONDUCTIVITY IS MULTIPLIED BY 4.63

### LAYER 2

#### TYPE 1 - VERTICAL PERCOLATION LAYER

#### MATERIAL TEXTURE NUMBER 12

= 12.00 INCHES THICKNESS = 0.4710 VOL/VOL POROSITY FIELD CAPACITY = 0.3420 VOL/VOL =, WILTING POINT 0.2100 VOL/VOL INITIAL SOIL WATER CONTENT = 0.3583 VOL/VOL

EFFECTIVE SAT. HYD. COND. = 0.419999997000E-04 CM/SEC

#### LAYER 3 -----

#### TYPE 2 - LATERAL DRAINAGE LAYER MATERIAL TEXTURE NUMBER 20

THICKNESS	=	0.20	INCHES
POROSITY	=	0.8500	VOL/VOL
FIELD CAPACITY	=	0.0100	VOL/VOL
WILTING POINT	=	0.0050	VOL/VOL
INITIAL SOIL WATER CONTENT	=	0.0189	VOL/VOL

EFFECTIVE SAT. HYD. COND. = 10.000000000 CM/SEC

SLOPE = 5.00 PERCENT DRAINAGE LENGTH = 250.0 FEET

#### LAYER 4

#### TYPE 4 - FLEXIBLE MEMBRANE LINER MATERIAL TEXTURE NUMBER 36

THICKNESS	=	0.40	INCHES
POROSITY	=	0.0000	VOL/VOL
FIELD CAPACITY	=	0.0000	VOL/VOL
WILTING POINT	=	0.0000	VOL/VOL
INITIAL SOIL WATER CONTENT	=	0.0000	VOL/VOL

EFFECTIVE SAT. HYD. COND. = 0.399999993000E-12 CM/SEC

FML PINHOLE DENSITY = 0.75 HOLES/ACRE FML INSTALLATION DEFECTS = 2.50 HOLES/ACRE FML PLACEMENT QUALITY = 3 - GOOD

LAYER 5

# TYPE 3 - BARRIER SOIL LINER MATERIAL TEXTURE NUMBER 9

EFFECTIVE SAT. HYD. COND. = 0.190000006000E-03 CM/SEC

### LAYER 6

# TYPE 1 - VERTICAL PERCOLATION LAYER MATERIAL TEXTURE NUMBER 31

THICKNESS = 120.00 INCHES

POROSITY = 0.5780 VOL/VOL

FIELD CAPACITY = 0.0760 VOL/VOL

WILTING POINT = 0.0250 VOL/VOL

INITIAL SOIL WATER CONTENT = 0.0760 VOL/VOL

EFFECTIVE SAT. HYD. COND. = 0.410000002000E-02 CM/SEC

## GENERAL DESIGN AND EVAPORATIVE ZONE DATA

NOTE: SCS RUNOFF CURVE NUMBER WAS COMPUTED FROM DEFAULT SOIL DATA BASE USING SOIL TEXTURE # 9 WITH A GOOD STAND OF GRASS, A SURFACE SLOPE OF 5.% AND A SLOPE LENGTH OF 250. FEET.

SCS RUNOFF CURVE NUMBER	=	76.10	
FRACTION OF AREA ALLOWING RUNOFF	=	100.0	PERCENT
AREA PROJECTED ON HORIZONTAL PLANE	=	1.000	ACRES
EVAPORATIVE ZONE DEPTH	=	2.0	INCHES
INITIAL WATER IN EVAPORATIVE ZONE	=	0.920	INCHES
UPPER LIMIT OF EVAPORATIVE STORAGE	=	1.002	INCHES
LOWER LIMIT OF EVAPORATIVE STORAGE	=	0.270	INCHES
INITIAL SNOW WATER	=	0.000	INCHES
INITIAL WATER IN LAYER MATERIALS	=	15.980	INCHES
TOTAL INITIAL WATER	=	15.980	INCHES
TOTAL SUBSURFACE INFLOW	=	0.00	INCHES/YEAR

## EVAPOTRANSPIRATION AND WEATHER DATA

NOTE: EVAPOTRANSPIRATION DATA WAS OBTAINED FROM CHICAGO ILLINOIS

STATION LATITUDE = 41.78 DEGREES
MAXIMUM LEAF AREA INDEX = 3.50
START OF GROWING SEASON (JULIAN DATE) = 117
END OF GROWING SEASON (JULIAN DATE) = 290
EVAPORATIVE ZONE DEPTH = 2.0 INCHES
AVERAGE ANNUAL WIND SPEED = 10.30 MPH
AVERAGE 1ST QUARTER RELATIVE HUMIDITY = 71.00 %
AVERAGE 2ND QUARTER RELATIVE HUMIDITY = 65.00 %

NOTE: PRECIPITATION DATA WAS SYNTHETICALLY GENERATED USING COEFFICIENTS FOR CHICAGO ILLINOIS

AVERAGE 3RD QUARTER RELATIVE HUMIDITY = 70.00 % AVERAGE 4TH OUARTER RELATIVE HUMIDITY = 72.00 %

#### NORMAL MEAN MONTHLY PRECIPITATION (INCHES)

JAN/JUL	FEB/AUG	MAR/SEP	APR/OCT	MAY/NOV	JUN/DEC
1.60	1.31	2.59	3.66	3.15	4.08
3.63	3.53	3.35	2.28	2.06	2.10

NOTE: TEMPERATURE DATA WAS SYNTHETICALLY GENERATED USING COEFFICIENTS FOR CHICAGO ILLINOIS

#### NORMAL MEAN MONTHLY TEMPERATURE (DEGREES FAHRENHEIT)

JAN/JUL	FEB/AUG	MAR/SEP	APR/OCT	MAY/NOV	JUN/DEC
21.40	26.00	36.00	48.80	59.10	68.60
73.00	71.90	64.70	53.50	39.80	27.70

NOTE: SOLAR RADIATION DATA WAS SYNTHETICALLY GENERATED USING COEFFICIENTS FOR CHICAGO ILLINOIS

AND STATION LATITUDE = 41.78 DEGREES

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

TOTALS 1.47 1.46 2.39 3.26 3.34 4.22

	3.43	3.42	3.11	2.19	2.10	2.22	
STD. DEVIATIONS	0.68 1.83	0.71 1.76		1.52 1.22			
RUNOFF							
TOTALS	0.400 0.053	1.390 0.033		0.318 0.002	0.008		
STD. DEVIATIONS	0.630 0.161		1.753 0.074	0.590 0.009			
EVAPOTRANSPIRATION							
TOTALS	0.539 2.014		0.630 1.442		1.965 0.912		
STD. DEVIATIONS	0.117 0.807	0.084 0.780	0.286 0.628		0.759 0.248		
LATERAL DRAINAGE COLLE	CTED FROM I	LAYER 3					
TOTALS	0.1163 1.6026	0.0012 1.5145	0.1514 1.5676		1.4708 1.1522		
STD. DEVIATIONS	0.1641 1.2231	0.0064 1.0275		0.9201 0.7596	1.1226 0.7969		
PERCOLATION/LEAKAGE THROUGH LAYER 5							
PERCOLATION/LEAKAGE TH	ROUGH LAYER	R 5					
PERCOLATION/LEAKAGE TH	0.0000		0.0000		0.0001		
	0.0000	0.0000 0.0001 0.0000	0.0001	0.0001	0.0001	0.0001	
TOTALS	0.0000 0.0001 0.0000 0.0001	0.0000 0.0001 0.0000 0.0001	0.0001	0.0001	0.0001	0.0001	
TOTALS STD. DEVIATIONS	0.0000 0.0001 0.0000 0.0001 ROUGH LAYEH	0.0000 0.0001 0.0000 0.0001	0.0001 0.0000 0.0001	0.0001 0.0001 0.0000	0.0001 0.0001 0.0000	0.0001 0.0001 0.0000	
TOTALS  STD. DEVIATIONS  PERCOLATION/LEAKAGE TH TOTALS	0.0000 0.0001 0.0001 0.0001 ROUGH LAYER 0.0000 0.0001	0.0000 0.0001 0.0000 0.0001 R 6  0.0000 0.0001	0.0001 0.0000 0.0001	0.0001 0.0001 0.0000 0.0001 0.0001	0.0001 0.0001 0.0000 0.0001 0.0001	0.0001 0.0001 0.0000 0.0001 0.0001	
TOTALS  STD. DEVIATIONS  PERCOLATION/LEAKAGE TH TOTALS  STD. DEVIATIONS	0.0000 0.0001 0.0001 0.0001 ROUGH LAYER 0.0000 0.0001	0.0000 0.0001 0.0000 0.0001 R 6  0.0000 0.0001	0.0001 0.0000 0.0001 0.0000 0.0001	0.0001 0.0001 0.0000 0.0001 0.0001 0.0000	0.0001 0.0001 0.0000 0.0001 0.0001 0.0000	0.0001 0.0001 0.0000 0.0001 0.0001	
TOTALS  STD. DEVIATIONS  PERCOLATION/LEAKAGE TH TOTALS  STD. DEVIATIONS	0.0000 0.0001 0.0000 0.0001 ROUGH LAYER 0.0000 0.0001	0.0000 0.0001 0.0000 0.0001 R 6  0.0000 0.0001	0.0001 0.0000 0.0001 0.0000 0.0001	0.0001 0.0001 0.0000 0.0001 0.0001 0.0000	0.0001 0.0001 0.0000 0.0001 0.0001 0.0000	0.0001 0.0001 0.0000 0.0001 0.0001	
TOTALS  STD. DEVIATIONS  PERCOLATION/LEAKAGE TH TOTALS  STD. DEVIATIONS	0.0000 0.0001 0.0000 0.0001 ROUGH LAYER 0.0000 0.0001 0.0000	0.0000 0.0001 0.0000 0.0001 R 6  0.0000 0.0001 0.0000 0.0001	0.0001 0.0000 0.0001 0.0000 0.0001	0.0001 0.0001 0.0000 0.0001 0.0001 0.0000	0.0001 0.0001 0.0000 0.0001 0.0001 0.0000	0.0001 0.0001 0.0000 0.0001 0.0001	
TOTALS  STD. DEVIATIONS  PERCOLATION/LEAKAGE TH TOTALS  STD. DEVIATIONS  AVERAGES	0.0000 0.0001 0.0000 0.0001 ROUGH LAYER 0.0000 0.0001 0.0000 0.0001	0.0000 0.0001 0.0000 0.0001 R 6  0.0000 0.0001 0.0000 0.0001	0.0001 0.0000 0.0001 0.0000 0.0001 0.0000 DAILY HEZ	0.0001 0.0001 0.0000 0.0001 0.0001 0.0000	0.0001 0.0001 0.0000 0.0001 0.0001 0.0000 ES)	0.0001 0.0001 0.0000 0.0001 0.0001 0.0000	

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

\*

AVERAGE ANNUAL TOTALS & (S	STD. DEVIATI	ONS) FOR YE	ARS 1 THROUG	gH 30
	INCHE	 S	CU. FEET	PERCENT
PRECIPITATION	32.60 (	5.565)	118325.9	100.00
RUNOFF	4.750 (	2.1588)	17244.21	14.573
EVAPOTRANSPIRATION	15.419 (	2.4608)	55972.44	47.304
LATERAL DRAINAGE COLLECTED FROM LAYER 3	12.43034 (	3.12447)	45122.129	38.13377
PERCOLATION/LEAKAGE THROUGH LAYER 5	0.00081 (	0.00018)	2.924	0.00247
AVERAGE HEAD ON TOP OF LAYER 4	0.003 (	0.001)		
PERCOLATION/LEAKAGE THROUGH LAYER 6	0.00081 (	0.00018)	2.925	0.00247
CHANGE IN WATER STORAGE	-0.004 (	1.3462)	-15.80	-0.013
*******	* * * * * * * * * * *	*****	******	*****

\*

PEAK DAILY VALUES FOR YEARS	1 THROUGH	30
	(INCHES)	(CU. FT.)
PRECIPITATION	4.09	14846.700
RUNOFF	1.715	6224.0708
DRAINAGE COLLECTED FROM LAYER 3	1.40194	5089.04932
PERCOLATION/LEAKAGE THROUGH LAYER 5	0.000070	0.25589
AVERAGE HEAD ON TOP OF LAYER 4	0.124	
MAXIMUM HEAD ON TOP OF LAYER 4	0.245	
LOCATION OF MAXIMUM HEAD IN LAYER 3 (DISTANCE FROM DRAIN)	2.0 FEET	
PERCOLATION/LEAKAGE THROUGH LAYER 6	0.000030	0.10777
SNOW WATER	4.86	17649.8242
MAXIMUM VEG. SOIL WATER (VOL/VOL)		5010
MINIMUM VEG. SOIL WATER (VOL/VOL)	0.1	1350

<sup>\*\*\*</sup> Maximum heads are computed using McEnroe's equations. \*\*\*

Reference: Maximum Saturated Depth over Landfill Liner by Bruce M. McEnroe, University of Kansas ASCE Journal of Environmental Engineering Vol. 119, No. 2, March 1993, pp. 262-270.

\*\*\*\*\*\*\*\*\*\*\*\*\*

\*

F'INAL	WATER	STORAGE	ΑT'	$_{ m END}$	OF'	YEAR	30

LAYER	(INCHES)	(VOL/VOL)	
1	1.8061	0.3010	
2	4.1040	0.3420	
3	0.0020	0.0100	
4	0.0000	0.0000	
5	0.5010	0.5010	
6	9.1200	0.0760	
SNOW WATER	0.316		