



40 CFR PART 257 GROUNDWATER MONITORING PLAN

RCPA - Rush Island Energy Center

Jefferson County, Missouri, USA



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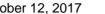


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1.0 INTRODUCTION

This Groundwater Monitoring Plan (GMP) presents information on the design of the groundwater monitoring system, groundwater sampling and analysis procedures, and groundwater statistical analysis methods for the Ameren Missouri (Ameren) Rush Island Energy Center (Facility) in Jefferson County, Missouri (see location on **Figure 1**). The Facility manages Coal Combustion Residuals (CCR) at an on-site surface impoundment known as the RCPA Surface Impoundment. The RCPA is approximately 104 acres in size and is located in the south-southeast portion of the Facility.

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This GMP was developed to meet the requirements of United States Environmental Protection Agency (USEPA) 40 CFR Part 257 "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule" (the CCR Rule). The CCR Rule requires owners or operators of an existing CCR Surface Impoundment to install a groundwater monitoring system and develop a sampling and analysis program (§§ 257.90 - 257.94). Ameren Missouri has determined that the RCPA Surface Impoundment is subject to the requirements of the CCR Rule. For this GMP, the Rush Island Energy Center generating plant is referred to as the RIEC and the RIEC and its surrounding facilities, including the Surface Impoundment, are referred to as the Facility or Site.



2.0 SITE SETTING

Ameren owns and operates the Facility in Jefferson County, Missouri located approximately 40 miles south of downtown St. Louis. **Figure 1** depicts the location of the Facility and property boundaries referenced to local topographic features and the Mississippi River. **Figure 2** depicts Facility structures relative to site property boundaries and the Mississippi River. The Facility encompasses approximately 960 acres and is located within the Mississippi River Valley and the adjacent upland areas to the west. The property is bounded to the east by the Mississippi River, to the south by Isle Du Bois Creek, to the north by Muddy Creek and extends into the bluffs to the west.

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The Surface Impoundment is bounded to the north by the RIEC, which is at an elevation of approximately 410 feet above mean sea level (MSL). Directly to the east, south and west of the Surface Impoundment are low-lying floodplain areas, which have a lower topographic relief ranging from approximately 390 to 400 feet MSL. The eastern portion of the property contains approximately 300 to 400 feet of forested area in a narrow strip between the Surface Impoundment and the Mississippi River during normal river water levels. The southern portion of the property is forested and contains the Isle Du Bois Creek, which is as close as approximately 100 feet away from the Surface Impoundment. The western side of the property is bounded by a small drainage creek that is approximately 100 to 300 feet away from the Surface Impoundment. Approximately 300 to 500 feet west of the Surface Impoundment are bedrock bluffs that rise to elevations exceeding 700 feet MSL.

2.1 Coal Combustion Residuals (CCR) Surface Impoundment (RCPA)

The Surface Impoundment is located in the floodplain of the Mississippi River on the south-southeastern portion of the Facility to the south of the coal-fired plant and is constructed with perimeter berms at an elevation of approximately 410 feet MSL, which is above the 100-year flood event elevation of 406 feet MSL (FEMA, 2006). Both fly ash and bottom ash have been historically managed and stored in this unlined Surface Impoundment. Based on borings and piezometers previously completed by Natural Resource Technology, Inc. (NRT) the thickness of ash within the Surface Impoundment ranges from approximately 30 feet below ground surface (bgs) near the perimeter to approximately 109 feet bgs near the center of the impoundment (NRT, 2015). Based on NRT's findings, typical base elevations of ash in the Surface Impoundment are approximately 310 feet MSL.

2.2 Geology

2.2.1 Physiographic setting and Regional Geology

The Facility lies in the eastern margin of the Salem Plateau, a subsection of the Ozark Plateau Physiographic Province (USGS, 1994). The Ozark Plateau is described as a geological uplift or dome that has risen above the surrounding lowlands. The highpoint of this plateau or dome is located in the St. Francois Mountains. In the region of the Facility, the Salem Plateau portion of the Ozark Plateau is



comprised of Mississippian and Ordovician-aged dolostones, limestones and sandstones. This portion of the Ozark Plateau consists of bedrock cliffs along the major river channels. Bedrock in the area around the Facility dips approximately 3 to 7 degrees towards the east-northeast with occasional east-northeast trending syncline-anticline pairs located in the bluffs to the west of the Mississippi River Valley (Baker, 2001a, 2001b, 2001c).

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2.2.2 Local Geology

The geology immediately surrounding the Facility is comprised of two distinctly different geological terrains; (1) floodplain deposits of the Mississippi River Valley and (2) older sedimentary bedrock formations. Most of the Facility, including all of the plant infrastructure and the Surface Impoundment, lies within the Mississippi River Valley on floodplain and alluvial soil deposits. The Mississippi River Valley in this region is an approximately 4- to 5-mile wide area of floodplain with alluvial deposits that are the result of the water flow and deposition from the Mississippi River. Based on boring logs from NRT (NRT 2014a, NRT 2014b, and NRT 2015) and Golder (**Appendix A**), the alluvial deposits are typically comprised of sands and gravels with lesser amounts of silts and clays, with an overall fining upward sequence. With depth, silt and clay deposits are less abundant and the sands and gravels typically coarsen. The depth of the alluvial deposits near the Surface Impoundment ranges from approximately 56 to 147 feet bgs (255 to 331 feet MSL).

Beneath the alluvial deposits of the Mississippi River Valley lie bedrock deposits from the lower part of the Ordovician-aged Plattin group. Based on the borings completed by NRT, this bedrock unit is comprised of massive, gray to brown, micritic, fossiliferous limestone with shale interbeds. The depth to bedrock typically increases towards the Mississippi River and bedrock beneath the Surface Impoundment dips towards the east-northeast at approximately 3 to 7 degrees. The Plattin group is stratigraphically underlain by the Joachim Dolomite. The higher portions of the bluffs to the west of the facility are comprised of Mississippian-age limestone and shales, which are exposed along the eastern portions of the bluffs.

2.3 Site Hydrogeology

Site hydrogeology has been characterized based on information obtained from 45 soil borings and 90 piezometer installations completed at the site by NRT (NRT 2014a, NRT 2014b, and NRT 2015), as well as the 9 CCR Rule groundwater monitoring well installations completed by Golder. **Figure 3** provides a generalized west-east depiction of the Surface Impoundment referenced to local geology, groundwater, and the Mississippi River.

2.3.1 Uppermost Aquifer

The CCR Rule requires that a groundwater monitoring system be completed in the uppermost aquifer around each Surface Impoundment (§257.91(a)). As shown on **Figure 3** and in the cross-sections located in **Appendix B**, the uppermost aquifer is the alluvial sand and gravel deposits associated with the Mississippi River Valley alluvium. These alluvial deposits (alluvium) overly Ordovician-age limestone of the



Plattin group. As generally described above these alluvial deposits exhibit a fining-upward sequence with some silts and clays present within the shallow zones and mostly coarse sands and gravels present at depth.

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2.3.2 Surface Water and Groundwater Elevations

2.3.2.1 CCR Surface Impoundment Pore-Water

Groundwater surface elevations were recorded within the Surface Impoundment by NRT from January 2013 through March 2015 and ranged from 383 to 403 feet MSL with an average elevation of approximately 397 feet MSL. Groundwater elevations within the Surface Impoundment are generally higher than those in the surrounding alluvial aquifer. The coal ash pore-water is mounded generally highest in the middle areas of the impoundment and where a pond water surface is present, with the mounding effect diminishing toward the edge of the impoundment as indicated by exterior well water level data. Data show water mounding regardless of the Mississippi River elevation; however, the mounding is less pronounced at times of high river level.

2.3.2.2 Alluvial Aguifer

NRT (2015) obtained groundwater elevation measurements from January 2013 through March 2015 within the alluvial aquifer in the area in and around the Surface Impoundment. A total of 39 piezometers were used for the groundwater elevation measurements in the shallow zone of the aquifer with well depths ranging from 4.5 to 61.0 feet BGS and 340.5 to 393.8 feet MSL. Groundwater elevations were also measured within deeper depths (as deep as approximately 325 feet MSL) of the alluvial aquifer adjacent to the Surface Impoundment (deeper zone).

Golder obtained groundwater elevation measurements from March 2016 through June 2017 within the alluvial aquifer for the CCR monitoring wells. For each of the 8 background sampling events (baseline events), groundwater elevations were measured at monitoring wells within a 24-hour timeframe and a potentiometric map was generated from these data (**Appendix C and Table 1**). Groundwater elevations ranged from approximately 369 to 384 feet MSL.

2.3.3 Groundwater Flow Directions

Groundwater flow within the alluvial aquifer is dynamic and is influenced by seasonal changes in the water level in the adjacent Mississippi River. River water levels measured at the Facility display large seasonal changes in the elevation of the Mississippi River water surface. For example, in 2013 and 2014, river water levels fluctuated between approximately 355 to 401 feet MSL. Water flows into and out of the alluvial aquifer as a result of fluctuating river water levels that produce "bank recharge" and "bank discharge" conditions. Under normal aquifer conditions, groundwater flow in the alluvial aquifer would be expected to



have a flow direction component parallel to the river and a flow component away from the bluffs, with a likely net flow direction generally to the east.

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Although the movement of groundwater within the alluvial aguifer at the Facility is complex, the movement has been characterized by frequent groundwater elevation measurements and the generation of potentiometric surface maps generated by NRT and Golder (Appendix B, Appendix C and Table 1). Groundwater movement in the alluvial aquifer has been assessed by measuring water elevations in the Surface Impoundment itself (coal ash pore-water), and different depths of the alluvial aquifer in the general vicinity of the Facility. NRT obtained groundwater elevation measurements and generated potentiometric surface maps in order to complete a Detailed Site Investigation, a preliminary Pond Closure Groundwater Monitoring and Sampling Plan (NRT, 2014a), and a Proposed Utility Waste Landfill Baseline Groundwater Monitoring Plan (NRT, 2014b).

Horizontal and vertical groundwater flow within the uppermost aguifer has been locally influenced by operation of the Surface Impoundment. Ponding of water in the Surface Impoundment at elevations greater than the static water levels in the underlying alluvial aquifer create a localized "mounding" effect, resulting in downward gradients and radial groundwater flow downward and outward from the impoundment.

Groundwater flow direction and hydraulic gradient were estimated for the CCR wells using the EPA's Online Tool for Site Assessment calculation for hydraulic gradient (magnitude and direction) (USEPA, 2016). Estimated results from this analysis are provided in **Table 2**. These results indicate that while groundwater flow direction is variable, overall net groundwater flow during the baseline sampling period was generally toward the east/northeast (toward the river).

Based on the potentiometric surface maps, a general flow direction from the west (bluffs area) to the east (Mississippi River) under normal river conditions is expected. However, during periods of high river levels, groundwater flow can temporarily reverse and flow westward. During these times of high river stage and temporary flow direction changes, horizontal groundwater gradients generally tend to decrease and little net movement of groundwater to the west or north occurs.

Horizontal Gradients 2.3.3.1

Horizontal groundwater gradients in the alluvial aguifer are typically low and flat. The gradients are very dependent on river water levels (bank recharge and bank discharge conditions described earlier). NRT data displayed typical horizontal gradients ranging from <0.001 to 0.005 feet/foot.

Site wide horizontal gradients were also calculated for each of the baseline sampling events and the results of these are displayed on Table 2. The horizontal groundwater gradients are very low, ranging from 0.0002 to 0.0008 feet/foot.



A review of the potentiometric surface maps confirms the gradient estimates for a larger scale, but also demonstrates that localized horizontal gradients can be higher especially in areas near the Mississippi River.

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2.3.3.2 Vertical Gradients

A review of downward gradients observed in piezometers was completed by comparing groundwater elevations obtained by NRT (NRT 2015) between shallow and intermediate/deep zone piezometers from January 2013 through March 2015 in locations where the piezometers are nested (two or more piezometers within the same borehole, screened at different elevations). From the review of these data, areas outside of the Surface Impoundment show relatively low downward gradients, with the difference in groundwater elevations between the shallow and intermediate/deep groundwater zone typically less than 1 foot and illustrate that the shallow and deeper zones are hydraulically interconnected.

Downward gradients between the pore-water in the Surface Impoundment ash and the underlying deep alluvial groundwater zone are much greater, based on a review of water elevation measurements from nested piezometers (NRT, 2015). This downward gradient changes seasonally based on river levels and fluctuating alluvial aquifer groundwater levels. During high river level conditions, the difference in groundwater elevation between the pore-water in the Surface Impoundment and the deeper alluvial groundwater zone is less than the average, as low as approximately 4 feet during the study period. During low river level conditions, the difference in groundwater elevation has been shown to be as much as approximately 37 feet between the deeper alluvial groundwater zone and the pore-water in the Surface Impoundment ash.

2.3.3.3 Hydraulic Conductivities

The hydraulic conductivity of the alluvial aquifer has been investigated by NRT through the use of slug tests (NRT 2015). The hydraulic conductivity is highly dependent of the geology present within the screened interval of the piezometer/well. The hydraulic conductivity has been characterized for three distinct areas including:

- The Surface Impoundment itself (coal ash pore-water)
- The shallow alluvial groundwater zone
- Intermediate to deep alluvial groundwater zone

Four slug tests were completed in two separate piezometers within the Surface Impoundment and all four tests determined a hydraulic conductivity of 1 x 10⁻⁴ cm/sec. Within the shallow alluvial groundwater zone, 43 slug tests were completed at 20 separate piezometers. Results from this testing demonstrate an average hydraulic conductivity of 1.58 x 10⁻³ cm/sec with a maximum of 7.00 x 10⁻³ cm/sec and a minimum of 3.00 x 10⁻⁵ cm/sec. Within the deep alluvial groundwater zone, 40 slug tests were completed at 14





separate piezometers. Results from this testing demonstrate an average hydraulic conductivity of 2.84×10^{-2} cm/sec with a maximum of 2.00×10^{-1} cm/sec and a minimum of 2.00×10^{-4} cm/sec.

NRT's findings for Hydraulic conductivities values for the three groundwater zones are summarized in **Table 3.**

Table 3: Summary of Hydraulic Conductivities (NRT)

Groundwater Component	Minimum Hydraulic Conductivity (cm/sec)	Average Hydraulic Conductivity (cm/sec)	Maximum Hydraulic Conductivity (cm/sec)
Surface Impoundment Pore-water	-	1.00 x 10⁻⁴	-
Shallow Alluvial Groundwater	3.0 x 10 ⁻⁵	1.58 x 10 ⁻³	7.00 x 10 ⁻³
Deep Alluvial Groundwater	2.00 x 10 ⁻⁴	2.84 x 10 ⁻²	2.00 x 10 ⁻¹

The results of the slug testing program completed by NRT show that the average hydraulic conductivity of the Surface Impoundment ash is significantly lower than the surrounding alluvial aquifer. The highest hydraulic conductivities were reported for the deep alluvial zone, which has an average hydraulic conductivity one order of magnitude higher than the shallow zone as tested by NRT. Additionally, the higher hydraulic conductivity and variable graded nature of the alluvial aquifer is expected to lead to relatively high dispersivity potential that will likely increase with depth. This is due to the prevalence of coarser particles (gravel, cobbles, etc.) at depth and relatively higher groundwater flow velocities stemming from higher hydraulic conductivities in the deep alluvial groundwater zone.

Golder also performed rising head hydraulic conductivity tests on the 9 newly installed CCR monitoring wells in order to estimate the hydraulic conductivities in December 2015. The tests were conducted using a pneumatic slug (Hi-K slug) and a downhole pressure transducer. The results of Golder's hydraulic conductivity testing estimated the geometric mean of hydraulic conductivity to be approximately 2 x 10⁻² cm/sec. Golder's findings for hydraulic conductivity values are summarized in **Table 4** and are consistent with the conductivities calculated by NRT.



Table 4: CCR Monitoring Well Hydraulic Conductivities

				Estimated Hydraulic	Estimated Hydraulic				
	Total Depth	Well Screen Interval	Well Screen interval	Conductivity	Conductivity				
Well ID	(feet BTOC)	(feet BTOC)	(feet MSL)	(feet/day)	(cm/sec)				
RCPA Surface Impoundment Monitoring Wells									
MW-1	85.1	74.9 - 84.7	308.8 - 318.6	88	3.10E-02				
MW-2	84.6	74.4 - 84.2	307.5 - 317.3	64	2.26E-02				
MW-3	82.5	72.3 - 82.1	307.1 - 316.9	44	1.55E-02				
MW-4	92.1	81.9 - 91.7	299.1 - 308.9	56	1.98E-02				
MW-5	62.6	57.4 - 62.2	325.8 - 330.6	92	3.26E-02				
MW-6	61.5	56.3 - 61.1	340.0 - 344.8	37	1.30E-02				
MW-7	100.1	89.9 - 99.7	306.4 - 316.2	37	1.32E-02				
Background Monitoring Wells									
MW-B1	102.0	91.8 - 101.6	307.9 - 317.7	54	1.92E-02				
MW-B2	89.8	79.6 - 89.4	306.5 - 316.3	45	1.60E-02				

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Notes:

- 1. feet BTOC feet below top of casing
- 2. feet MSL feet above mean sea level.
- 3. cm/sec centimeters per second.
- 4. Slug tests were completed by Golder Associates on December 7, 2015 using a Pneumatic Hi-K Slug®.

2.3.4 Porosity and Effective Porosity

Porosities were estimated based on the grain size distributions of aquifer soil samples collected during monitoring well drilling. A representative grain size distributions were collected from the screen intervals at MW-7 and MW-B2 using the ASTM D6912 Method B and the results are provided in Appendix D. The samples from MW-7 and MW-B2 were similar in field classification to other well drilling samples and the results indicate that the screened interval of the alluvial aquifer are mostly comprised of sand (at least 90%) with lesser amounts of gravel, silt and clay. Also, the typical grain size of the sand ranges from fine to medium sand. Textbook values of porosities for sands and sand/gravel mixes range from 25-50% (Fetter, 2000 and Freeze and Cherry, 1979) and fine sands typically range from 29-46%, whereas coarse sands typically range from 26-43% (Das, 2008). An average porosity of 35% is estimated for the alluvial aquifer based on the site data.

Effective porosity is the porosity that is available for fluid flow. Studies completed in unconsolidated sediments have determined that water molecules pass through all pores and the effective porosity is approximately equal to the total porosity (Fetter, 2000). Therefore, the effective porosity of the alluvial aguifer is also estimated to be 35%.



3.0 GROUNDWATER MONITORING NETWORK

3.1 Monitoring Network Design Criteria

§257.91 of The CCR Rule sets out the requirements for development of a groundwater monitoring system for both new and existing CCR landfills and Surface Impoundments. The performance standard in The CCR Rule (§257.91(a)) states that the groundwater monitoring system must consist of a sufficient number of wells at appropriate locations to yield groundwater samples in the uppermost aquifer that accurately represent:

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- The quality of background groundwater
- The quality of groundwater passing the waste boundary of the CCR unit

3.2 Design of the Groundwater Monitoring System

The detection monitoring well network for the Facility is depicted on **Figure 2**. The network consists of 9 monitoring wells screened in the uppermost aquifer for the purpose of monitoring the RCPA Surface Impoundment. The monitoring well network includes 2 background groundwater monitoring wells (MW-B1 and MW-B2) that are located approximately 3,500 to 4,500 feet north of the surface Impoundment in areas unaffected by CCR disposal. Seven (7) of the groundwater monitoring wells are placed ringing the RCPA and are considered to be the downgradient wells. The groundwater monitoring well locations were selected based on site-specific information presented in section 2.0 of this document, as well as the preferential migration pathway analysis below.

3.2.1 Preferential Migration Pathway Analysis

After detailed review of the information outlined in section 2.0 of this document, a preferential migration pathway for potential groundwater impacts coming from the Surface Impoundment was determined. The preferential migration pathway is a result of downward gradients created by the water level in the Surface Impoundment and high pore-water levels in the ash. The movement of constituents from within the Surface Impoundment ash will be downward and outward from the impoundment, and generally move in the overall downgradient direction toward the Mississippi River. The groundwater gradient and the rate of groundwater movement will be variable depending on the river water elevations.

Ash within the Surface Impoundment extends down to an average base elevation of approximately 310 feet MSL. Subsurface materials beneath and around the ash consist of a thick deposit of mostly alluvial sand and gravel (see **Figure 3**) that comprise the alluvial aquifer, which is more permeable than the ash. Migration of potential CCR impacts from the ash into the uppermost aquifer will follow the path of least resistance and the generally coarser sediments in the deeper alluvial aquifer zone with its potential for



higher hydraulic conductivity and the downward gradient beneath the pond presents the highest potential for migration of impacts.

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3.3 Groundwater Monitoring Well Placement

3.3.1 Background/Upgradient Monitoring Well Locations

As described above, the flow of groundwater in the alluvial aquifer is generally from the bluffs area located west of the site toward the Mississippi River, however, alluvial aquifer flow is locally influenced by water levels in the RCPA and the Mississippi River level. The CCR Rule (§257.91(a)(1)) requires that background groundwater samples from the uppermost aquifer:

"Accurately represent the quality of background groundwater that has not been affected by leakage from a CCR unit."

The CCR Rule also allows for sampling of background monitoring wells that are not hydraulically upgradient where hydrogeological conditions do not allow wells that are hydraulically upgradient and/or where sampling at other monitoring wells will provide an indication of background groundwater quality that is as representative as, or more representative than, that provided by upgradient monitoring wells. At the Facility, the alluvial aquifer terminates at the bluff and does not significantly extend westward past the edge of the Surface Impoundment, so collection of background samples is not feasible to the west of the Surface Impoundment. Two background sampling locations are located north of the RCPA, outside of the influence of the Surface Impoundment and upstream relative to the flow of the Mississippi River.

As shown in **Figure 2**, background monitoring well MW-B1 is north of the Surface Impoundment at a location relatively close to the Mississippi River. This well provides background groundwater quality representative of upgradient Mississippi River influences on the alluvial aquifer. The second background monitoring well location (MW-B2) is located away nearer to the bluffs, allowing monitoring of groundwater which originates from upgradient to the west and north.

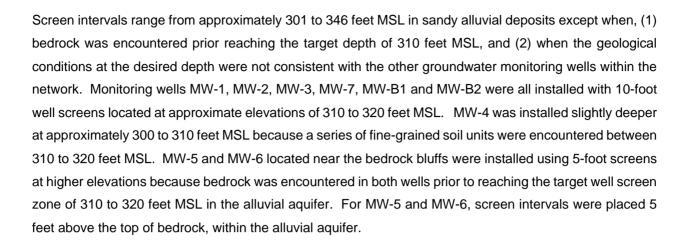
3.3.2 Downgradient Monitoring Well Locations

As discussed above, downgradient monitoring wells are located ringing the RCPA to monitor potential migration pathways. **Figure 2** shows that the downgradient well network consists of seven (7) groundwater monitoring wells (MW-1, MW-2, MW-3, MW-4, MW-5, MW-6, and MW-7) around the RCPA at locations that are located as close to the waste boundary as practical.

3.3.1 Groundwater Monitoring Well Screen Intervals

The system of monitoring wells ringing the Surface Impoundment are screened in the alluvial aquifer zone near the base elevation of the CCR. Details on the construction of the groundwater monitoring wells are provided in **Table 5** and **Appendix E**.







4.0 INSTALLATION OF THE GROUNDWATER MONITORING SYSTEM

The CCR Rule Groundwater Monitoring System for the RCPA was installed in October-November 2015 as described in the following subsections.

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4.1 Drilling Methods and Monitoring Well Constructions

Cascade Drilling LP installed the monitoring wells using a rotosonic drill rig (Mini Sonic CDD 1415) under direct supervision of a Golder Geologist or Engineer. Continuous soil core samples were obtained at each well borehole location and were logged in the field by Golder. Soils were classified according to the Unified Soil Classification System. Boring logs and well construction diagrams are provided in **Appendix A**, and **Appendix E**, respectively.

Groundwater monitoring wells were installed in accordance with Missouri Department of Natural Resources (MDNR) Well Construction Rules (10 CSR 23-4.060 Construction Standards for Monitoring Wells). All groundwater monitoring wells were installed with 2-inch diameter PVC well riser pipes and 5 or 10-foot long, 0.010-inch machine slotted well screens. Wells were installed with a sand filter pack, bentonite seal, and annular space in accordance with MDNR Well Construction Rules. Details on the construction of the groundwater monitoring wells are provided in **Table 5** and **Appendix E**.

Monitoring wells were completed with an aluminum protective cover with a locking lid that extends approximately 2 to 3 feet above ground surface and a small concrete pad. Yellow protective posts (concrete filled steel bollards) have been installed around each monitoring well.

4.2 Groundwater Monitoring Well Development

After well construction, a Golder geologist or engineer developed the groundwater monitoring wells using surging and purging techniques. During development, field parameters (pH, conductivity, temperature, and turbidity) were recorded and development was complete once a minimum of three well-bore volumes of water were purged, turbidity was typically less than 20 nephelometric turbidity units (NTU) or ± 10% and consecutive measurements of field parameter values were within 10 percent difference. Groundwater monitoring wells were developed using an inertial pump with a surge block ring attached to a foot valve to surge and purge the well. Well development forms are attached in **Appendix F**.

4.3 Dedicated Pump Installation

A dedicated pump was installed in each groundwater monitoring well after development and hydraulic conductivity testing. The dedicated pumps provide a consistent, repeatable sampling method to reduce likelihood of cross contamination, reduce water sample turbidity, and expedite sampling. For the purposes of this groundwater monitoring network, low-flow QED brand PVC MicroPurge bladder pumps with Dura-Flex Teflon bladders were installed in each well.





4.4 Surveying and Well Registration

Zahner and Associates, Inc., a Professional Land Surveyor licensed in Missouri, surveyed the location and top of casing elevation of the monitoring wells. A drawing showing the location of the groundwater monitoring wells is shown in **Figure 2** and a summary of survey information is provided in **Table 5**. Upon completion of monitoring well installation and surveying, MDNR Well Construction Registration Forms were prepared for each well and submitted to MDNR. Copies of these forms are provided in **Appendix G**.



5.0 GROUNDWATER MONITORING PROGRAM

The groundwater monitoring program for the RCPA Surface Impoundment is described in the following sections.

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5.1 Baseline Sampling Events

In accordance with section 257.94(b) of the CCR Rule, before starting detection monitoring, eight baseline (or background) samples were collected for all Appendix III and Appendix IV parameters at all downgradient and upgradient/background monitoring wells prior to October 17, 2017. These samples establish initial baseline datasets that are used for the statistical evaluation of groundwater results.

5.2 Detection Monitoring

The Detection Monitoring Program is defined in the CCR Rule in section 257.94 and the following sections outline the procedures for the detection monitoring program.

5.2.1 Sampling Constituents and Monitoring Frequency

Detection monitoring should be completed at a minimum of semi-annually (approximately every 6 months) for all Appendix III constituents (**Table 6**), unless a demonstration that the need for an alternative monitoring schedule is required. **Table 7** lists the analytical methods and practical quantitation limits used for the monitoring program.

5.2.2 Data Evaluation and Response

As required in the CCR Rule, a statistical evaluation of the groundwater data must be completed within 90 days of receiving data from the laboratory. The data will be analyzed using the methods and procedures outlined in the statistical analysis plan (**Appendix H**).

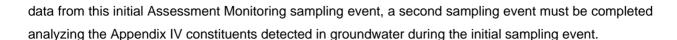
5.3 Assessment Monitoring

Assessment monitoring is outlined in section 257.95 of the CCR Rule and is initiated after a confirmed Statistically Significant Increase (SSI) has been identified and no alternate source demonstration has been completed. In accordance with the CCR Rule, a notification must be prepared and placed within the Facility operating record and on the publically available website stating that an Assessment Monitoring program has been initiated. The purpose of Assessment Monitoring is to determine whether or not groundwater concentrations are at a Statistically Significant Level (SSL) compared to Groundwater Protection Standards (GWPS). Detection Monitoring sampling continues during Assessment Monitoring.

5.3.1 Sampling Constituents and Monitoring Frequency

As outlined in section 257.95 of the CCR rule, Assessment Monitoring groundwater sampling must begin within 90 days of a confirmed SSI determination. Sampling must be completed at all monitoring wells used in the detection monitoring program, for all Appendix IV analytes (**Table 6**). Within 90 days of receiving





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Following this initial phase of the Assessment Monitoring Program, the CCR Rule requires sampling of the full list of Appendix IV constituents on an annual basis (Annual Assessment Event). During the other semi-annual Assessment Sampling Event, only those Appendix IV constituents that are detected during the annual sampling event are to be analyzed and reported. Additionally, verification resampling will be performed within 90 days of receiving data from the laboratory for all detected Appendix IV constituents for each event.

5.3.2 Data Evaluation and Response

As required in the CCR Rule, a statistical evaluation of the groundwater data must be completed within 90 days of receiving data from the laboratory. The data will be analyzed using the methods and procedures outlined in the Statistical Analysis Plan (**Appendix H**).

A GWPS is required for each Appendix IV constituent and must be included in the annual report. The GWPS will be either the MCL or a value based on background data, whichever is higher. The generation of the GWPS is discussed in more detail in the Statistical Analysis Plan (**Appendix H**). Statistical analysis must be completed within 90 days of receiving data from the laboratory. The statistical analysis will determine if any constituents are SSLs greater than the GWPS.

In order to discontinue Assessment Monitoring and return to Detection Monitoring, the concentration of all Appendix III and Appendix IV constituents for all compliance wells must be at levels statistically lower than background levels for two consecutive sampling events (257.95(e)). If any constituent is present at a statistical level above background levels, but below the GWPS, then Assessment Monitoring continues.

5.3.2.1 Responding to a SSL

If the Assessment Monitoring statistical evaluations demonstrate that a SSL has been triggered, then the owner/operator of the CCR unit must complete the following four actions as described in 257.95(g):

- 1. Prepare a notification identifying the constituents in Appendix IV that have exceeded a CCR Unit specific GWPS. This notification must be placed in the facility operating record within 30 days of identifying the SSL (257.95(g)) and 257.105(h)). Additionally, within 30 days of placing the notification in the operating record, the notification must be posted to the internet site (257.107(h)).
- 2. Define the character and extent of the release and any relevant site conditions that may affect the corrective action remedy that is ultimately selected. The characterization must be sufficient to support a complete and accurate assessment of the corrective measures necessary to effectively clean up releases from the CCR Unit and must include at least the following: (No timeframe is specified in the CCR Rule for this action)





- A. Installation of additional monitoring wells that are necessary to define the contaminant plume
- B. Collect data on the nature and estimated quantity of the material released
- C. Install and sample at least one additional monitoring well at the facility boundary in the direction of the contaminant plume migration
- 3. Notify off-site property owners if the contamination plume has migrated offsite on to their property within 30 days of this determination.
- 4. If possible, provide an alternate source demonstration that determines that the SSL is not caused by a release at the facility within 90 days of completing the statistical evaluation. If no alternate source demonstration can be made and the plume is determined to have originated from the CCR Unit, then proceed to corrective action steps in the CCR Rule.
 - D. If no alternate source demonstration is made, and the CCR Unit is an unlined surface impoundment, the closure or retrofit must be initiated.

Actions 1-3 must be completed regardless of whether or not an alternate source demonstration can be made.

5.3.3 Annual Reporting Requirements

In addition to the periodical reporting listed above, an annual groundwater monitoring report will be prepared according to the requirements of 40 CFR §257.90(e). At a minimum, the annual groundwater monitoring report will contain the following information:

- The current status of the groundwater monitoring program
- A projection of key activities planned for the upcoming year
- A map showing the CCR unit and all background (or upgradient) and downgradient monitoring wells included in this monitoring plan
- A discussion of any monitoring wells that were installed or decommissioned during the preceding year or any other changes made to the groundwater monitoring system
- Analytical results from groundwater sampling
- The monitoring data obtained under §§ 257.90 through 257.98, including a summary of the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs
- A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels)
- If required, an alternate source demonstration that is certified by a professional engineer
- If required, a demonstration that an alternate sampling frequency is needed
- If assessment monitoring is required, a listing of GWPS for each Appendix IV constituent





6.0 GROUNDWATER SAMPLING METHODOLOGY

Sampling will be performed in accordance with generally accepted practices within the industry and with the provisions of Missouri regulations. The following sections provide details regarding procedures that will be used to collect groundwater samples. Although this section provides reference to specific forms, the use of other equivalent forms to record the necessary data is permissible.

6.1 Equipment Calibration

Equipment used to record field water quality parameters will be calibrated each day prior to use following manufacturers' recommendations. Calibration solutions for standardization materials will be freshly prepared or from non-expired stock. In the absence of manufacturer or regulatory guidance, field equipment should be calibrated to within +/- 10 percent of the standard (or 0.1 standard units for pH meters). Equipment that fails calibration may not be used. Calibration records will be maintained. A sample field Instrument Calibration Form is included in **Appendix I**.

6.2 Monitoring Well Inspection

Prior to performing any water purging or sampling, each monitoring well will be inspected to assess its integrity. The condition of each monitoring well will be evaluated for any physical damage or other breach of integrity. The security of each monitoring well will be assessed in order to confirm that no outside source constituents have been introduced to the monitoring well.

6.3 Water Level Measurement

To meet the requirements of §257.93(c), water level measurements will be taken at all monitoring wells and prior to the start of any groundwater purging. These measurements will be taken within a 24 hour period and will be recorded on the Record of Water Level Readings form or Groundwater Sample Collection Form (included in **Appendix I**). Static water levels will be measured in each monitoring well prior to purging using an electric meter accurate to 0.01 foot. The measuring probe will be rinsed with distilled or deionized water before and after use at each well.

6.4 Monitoring Well Purging

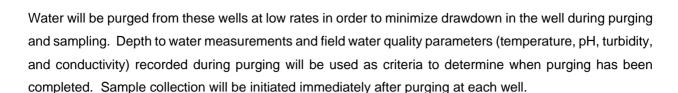
Prior to collecting samples, each monitoring well will be purged. Purging will be accomplished using either:

- Low-flow (a.k.a., minimal drawdown, or Micropurge) techniques
- Traditional purging techniques where at least three well volumes are evacuated before samples are collected

6.4.1 Low-Flow Sampling Technique

Low-flow groundwater sampling procedures will be used for purging and sampling monitoring wells that are equipped with dedicated pumps and will sustain a pumping rate of at least 100 milliliters per minute (ml/min).





During water purging, wells will be pumped at rates that minimize drawdown in the well. Purging rates in the range of 100-500 ml/min typically will be used; however, higher rates may be used if sustained by the well. Stabilization of the water column will be considered achieved when three consecutive water level measurements vary by 0.3 foot or less at a pumping rate of no less than 100 ml/min.

At a minimum, field water quality parameter measurements of temperature, pH, turbidity, and conductivity, will be measured during purging at each well. Prior to collecting the initial set of field water quality parameters, the water in the sampling pump and discharge tubing (i.e., pump system volume) remaining from the previous sampling event will be removed.

After evacuating the water in the pump system, collecting field measurements will begin. Depth to water measurements and field water quality parameter measurements will be made during purging. If a field meter equipped with a flow cell is used, an amount of water equal to the volume of the flow cell should be allowed to pass through the flow cell between individual field stabilization measurements. Stabilization will be attained and purging considered complete when three consecutive measurements of each field parameter vary within the following limits:

- ± 0.2 for pH
- ±3% for Conductivity
- ± 10% for Temperature
- Less than 10 nephelometric turbidity units (NTU) or ± 10% for Turbidity

All data gathered during monitoring well purging will be recorded on a form, an example of which is included in **Appendix I**.

6.4.2 Traditional Purge Techniques

If low-flow sampling is not performed, wells will be purged a minimum of 3 well volumes before collecting a sample. Purging procedures will generally follow those for low-flow sampling including measurement of the field parameters listed above with two exceptions:

- Higher flow rate may be used during purging
- Purging is completed after a minimum of 3 well volumes have been removed (see below)

Even where low-flow sampling is not performed, the sampling goals are to:



- Stabilize field parameters (listed in previous section) prior to collecting samples
- Minimize drawdown in the well

When traditional purge techniques are used, field stabilization measurements will be collected at the beginning of purging and between each well volume purged. The stability criteria will be those described above for low-flow sampling.

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6.4.3 Low Yielding Wells

If a monitoring well purges dry, it will be allowed to recover up to 24 hours before samples are collected. No additional purging will be performed after initially purging the monitoring well dry. If recharge is insufficient to fill all necessary sample bottles, samplers will note this on the field form, and fill as many sample bottles as possible.

6.5 Sample Collection

Sampling should take place immediately after purging is complete. Samples will be transferred directly from field sampling equipment into containers supplied by the analytical laboratory appropriate for the constituents being monitored (**Table 7**). Sample containers will be kept closed until the time each set of sample containers is filled.

6.6 Equipment Decontamination

All non-dedicated field equipment that is used for purging or sample collection shall be cleaned with a phosphate-free detergent and triple-rinsed, inside and out, with deionized or distilled water prior to use and between each monitoring well. Decontamination water shall be disposed of at an Ameren approved location. Any disposable tubing used with non-dedicated pumps should be discarded after use at each monitoring well. Clean latex gloves will be worn by sampling personnel during monitoring well purging and sample collection.

6.7 Sample Preservation and Handling

In accordance with §257.93 of The CCR Rule, groundwater samples collected as part of the monitoring program will not be filtered prior to analysis. Once groundwater samples have been collected and preserved in laboratory supplied containers, they will be packed into insulated, ice-filled coolers to be maintained at a temperature as close as possible to 4 degrees Celsius. Groundwater samples will be collected in the designated size and type of containers required for specific parameters. Sample containers will be filled in such a manner as not to lose preservatives by spilling or overfilling. Samples will be delivered to the laboratory or sent via overnight courier following chain-of-custody procedures.

6.8 Chain-of-Custody Program

The chain-of-custody (COC) program will allow for tracing sample possession and handling from the time of field collection through laboratory analysis. The COC program includes sample labels, sample seals,



field Groundwater Sample Collection Forms, and COC record. A sample Chain-of-Custody (COC) form is provided in **Appendix I**.

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Each sample will be assigned a unique sample identification number to be recorded on the sample label. The sample identification number for all samples will be designated differently based on the nature of the samples. Each sample identification number and description will be recorded on the field Groundwater Sample Collection Form and on the COC document.

6.8.1 Sample Labels

Sample labels sufficiently durable to remain legible when wet will contain the following information, written with indelible ink:

- Site and sample identification number
- Monitoring well number or other location
- Date and time of collection
- Name of collector
- Parameters to be analyzed
- Preservative, if applicable

6.8.2 Sample Seal

The shipping container will be sealed to prevent the samples from being disturbed during transport to the laboratory.

6.8.3 Field Forms

All field information must be completely and accurately documented to become part of the final report for the groundwater monitoring event. Example field forms are included in **Appendix I**. The field forms will document the following information:

- Identification of the monitoring well
- Sample identification number
- Field meter calibration information
- Static water level depth
- Purge volume
- Time monitoring well was purged
- Date and time of collection
- Parameters requested for analysis
- Preservative used
- Field water quality parameter measurements



- Field observations on sampling event
- Name of collector(s)
- Weather conditions including air temperature and precipitation

6.8.4 Chain-of-Custody Record

The COC record is required for tracing sample possession from time of collection to time of receipt at the laboratory. The National Enforcement Investigations Center (NEIC) of USEPA considers a sample to be in custody under any of the following conditions:

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- It is in the individual's possession
- It is in the individual's view after being in his possession
- It was in the individual's possession and he locked it up
- It is in a designated secure area

All environmental samples will be handled under strict COC procedures beginning in the field. The field team leader will be the field sample custodian and will be responsible for ensuring that COC procedures are followed. A COC record will accompany each individual shipment. The record will contain the following information:

- Sample destination and transporter
- Sample identification numbers
- Signature of collector
- Date and time of collection
- Sample type
- Identification of monitoring well
- Number of sample containers in shipping container
- Parameters requested for analysis
- Signature of person(s) involved in the chain of possession
- Inclusive dates of possession

A copy of the completed COC form will be placed in a water resistant bag and accompany the shipment and will be returned to the shipper after the shipping container reaches its destination. The COC record will also be used as the analysis request sheet. When shipping by courier, the courier does not sign the COC record: copies of shipping forms are retained to document custody.

6.9 Temperature Control and Sample Transportation

After collection, sample preservation, and labeling, sample containers will be placed in coolers containing water-ice with the goal of reducing the groundwater samples to a temperature of approximately 4°C or less.





All samples included in the shipping container will be packed in such a manner to minimize the potential for container breakage. Samples will be either hand-delivered or shipped via commercial carrier to the certified analytical laboratory. Custody seals will be placed on the shipping containers if a third party courier is used.



7.0 ANALYTICAL AND QUALITY CONTROL PROCEDURES

7.1 Data Quality Objectives

As part of the evaluation component of the Quality Assurance (QA) program, analytical results will be evaluated for precision, accuracy, representativeness, completeness, and comparability (PARCC). These are defined as follows:

■ Precision is the agreement or reproducibility among individual measurements of the same property, usually made under the same conditions

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- Accuracy is the degree of agreement of a measurement with the true or accepted value
- Representativeness is the degree to which a measurement accurately and precisely represents a characteristic of a population, parameter, or variations at a sampling point, a process condition, or an environmental condition
- Completeness is a measure of the amount of valid data obtained from a measurement system compared with the amount that was expected to be obtained under correct normal conditions
- Comparability is an expression of the confidence with which one data set can be compared with another data set in regard to the same property

The accuracy, precision and representativeness of data will be functions of the sample origin, analytical procedures and the specific sample matrices. Quality Control (QC) practices for the evaluation of these data quality indicators include the use of accepted analytical procedures, adherence to hold time, and analysis of QC samples (e.g., blanks, replicates, spikes, calibration standards and reference standards).

Quantitative QA objectives for precision and accuracy, along with sensitivity (detection limits) are established in accordance with the specific analytical methodologies, historical data, laboratory method validation studies, and laboratory experience with similar samples. The Representativeness of the analytical data is a function of the procedures used to process the samples.

Completeness is a qualitative characteristic which is defined as the fraction of valid data obtained from a measurement system (e.g., sampling and analysis) compared to that which was planned. Completeness can be less than 100 percent due to poor sample recovery, sample damage, or disqualification of results which are outside of control limits due to laboratory error or matrix-specific interferences. Completeness is documented by including sufficient information in the laboratory reports to allow the data user to assess the quality of the results. The overall completeness goal for each task is difficult to determine prior to data acquisition. For this project, all reasonable attempts will be made to attain 90% completeness or better (laboratory).

Comparability is a qualitative characteristic which allows for comparison of analytical results with those obtained by other laboratories. This may be accomplished through the use of standard accepted methodologies, traceability of standards to the National Bureau of Standards (NBS) or USEPA sources,



use of appropriate levels of quality control, reporting results in consistent, standard units of measure, and participation in inter-laboratory studies designed to evaluate laboratory performance.

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Data quality and the standard commercial report package will be evaluated with respect to PARCC criteria using the laboratory's QA practices, use of standard analytical methods, certifications, participation in interlaboratory studies, temperature control, adherence to hold times, and COC documentation (also called Data Validation).

7.2 Quality Assurance/Quality Control Samples

This section describes the various Quality Assurance/Quality Control (QA/QC) samples that will be collected in the field and analyzed in the laboratory and the frequency at which they will be performed.

7.2.1 Field Equipment Rinsate Blanks

In cases where sampling equipment is not dedicated or disposable, an equipment rinsate blank will be collected. The equipment rinsate blanks are prepared in the field using laboratory-supplied analyte-free water. The water is poured over and through each type of sampling equipment following decontamination and submitted to the laboratory for analysis of target constituents. **One rinsate blank will be collected for every 10 samples.**

7.2.2 Field Duplicates

Field duplicates are collected by sampling the same location twice, but the field duplicate is assigned a unique sample identification number. Samplers will document which location is used for the duplicate sample. One field duplicate will be collected for every 10 samples.

7.2.3 Field Blank

Field blanks are collected in the field using laboratory-supplied analyte-free water. The water is poured directly into the supplied sample containers in the field and submitted to the laboratory for analysis of target constituents. One field blank will be collected for every 10 samples.

7.2.4 Laboratory Quality Control Samples

The laboratory will have an established QC check program using procedural (method) blanks, laboratory control spikes, matrix spikes, and duplicates. Details of the internal QC checks used by the laboratory will be found in the laboratory QAP and the published analytical methods. These QC samples will be used to determine if results may have been affected by field activities or procedures used in sample transportation or if matrix interferences are an issue. One (1) Matrix Spike (MS)/ Matrix Spike Duplicate (MSD) set (i.e. one sample plus one MS, and one MSD sample at one location) will be collected per 20 samples. MS/MSD samples will have a naming convention as follows:



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Sample: MW-1DMS: MW-1D-MSMSD: MW-1D-MSD



8.0 DATA EVALUATION AND STATISTICAL ANALYSIS

The following sections describe the evaluation and analysis procedures that are followed upon receipt of the analytical report.

8.1 Evaluation of Rate and Direction of Groundwater Flow

Groundwater elevations will be determined for each sampling event and will be used to develop a groundwater elevation contour map that will be submitted with reports. The direction of groundwater flow will be determined from up-and downgradient relationships as depicted on the potentiometric surface map. Based on these maps, groundwater flow velocities will be estimated for each event.

8.2 Data Validation

Before the data are used for statistical analysis, they will be evaluated by examining the quality control data accompanying the data report from the laboratory. Relevant quality control data could include measures of accuracy (percent recovery), precision (relative percent difference, RPD), and sample contamination (blank determinations). Data that fail any of these checks will be flagged for further evaluation. A Data Quality Review (DQR) may be initiated with the laboratory for any anomalous data.

8.3 Statistical Analysis

Upon completion of the data validation, the data will be submitted for statistical analysis in compliance with 40 CFR §257.93. The detailed statistical analysis plan for the Facility will be included in **Appendix I**.



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TABLES

Groundwater Level Data RCPA Surface Impoundment

Rush Island Energy Center, Jefferson County, MO

	Loca	tion ⁶	Top of Casing ⁷	Ground Surface ⁷	Ŭ	nd Event 1 /2016	Backgroui 5/2/	nd Event 2 2016	Backgroui 7/14,	nd Event 3 /2016		nd Event 4 2016	Ü	nd Event 5 /2016		nd Event 6 /2017	Backgrou	nd Event 7 2017	J	nd Event 8 /2017
Well ID	Northing	Easting	Feet MSL ⁵	Feet MSL ⁵	DTW ³	GWE ⁴	DTW ³	GWE ⁴	DTW ³	GWE ⁴	DTW ³	GWE⁴	DTW ³	GWE ⁴	DTW ³	GWE ⁴	DTW ³	GWE ⁴	DTW ³	GWE ⁴
MW-1	835384.2	889832.5	395.52	393.5	21.63	373.89	12.23	383.29	22.09	373.43	17.52	378.00	24.97	370.55	25.79	369.73	20.35	375.17	8.48	387.04
MW-2	834261.5	890364.1	393.87	391.7	20.23	373.64	10.46	383.41	20.80	373.07	15.10	378.77	23.64	370.23	23.97	369.90	18.74	375.13	7.13	386.74
MW-3	833178.4	890892.7	391.38	389.2	18.02	373.36	7.97	383.41	18.70	372.68	12.89	378.49	21.51	369.87	21.73	369.65	16.37	375.01	4.87	386.51
MW-4	831647.5	890830.5	392.78	390.8	19.16	373.62	9.80	382.98	19.67	373.11	14.16	378.62	22.44	370.34	23.20	369.58	17.78	375.00	6.19	386.59
MW-5	831994.9	889984.5	390.36	388.0	16.17	374.19	7.21	383.15	16.54	373.82	11.29	379.07	19.27	371.09	19.99	370.37	14.96	375.40	3.52	386.84
MW-6	833111.0	888977.0	402.71	401.1	27.25	375.46	19.05	383.66	27.78	374.93	23.35	379.36	30.46	372.25	30.52	372.19	26.52	376.19	15.71	387.00
MW-7	834476.8	888483.3	407.95	406.1	33.25	374.70	25.93	382.02	32.86	375.09	28.33	379.62	35.90	372.05	38.11	369.84	32.86	375.09	20.33	387.62
MW-B1	837602.1	887903.9	411.61	409.6	37.38	374.23	29.77	381.84	37.20	374.41	32.50	379.11	40.15	371.46	42.41	369.20	36.88	374.73	24.34	387.27
MW-B2	837801.7	885337.2	397.85	395.9	22.57	375.28	16.91	380.94	22.20	375.65	17.79	380.06	25.00	372.85	28.44	369.41	22.95	374.90	10.45	387.40
Mississippi River	888823*	837705*	NA	NA	NA	372.47	NA	382.23	NA	371.84	NA	380.61	NA	371.92	NA	371.33	NA	377.01	NA	386.60

Notes:

1.) Groundwater monitoring wells surveyed by Zahner & Associates, Inc. on December 1, 2015.

- 2.) * Mississippi River gauge location is estimated.
- 3.) DTW Depth to water measured in feet below top of casing.
- 4.) GWE Groundwater elevation measured in feet above mean sea level.
- 5.) MSL Feet above mean sea level.
- 6.) Horizontal Datum: State Plane Coordinates NAD83 (2000) Missouri East Zone feet.
- 7.) Vertical Datum: NAVD88 feet.
- 8.) Mississippi River gage elevation provided by Ameren
- 9.) NA Not Applicable

Prepared JSI Check JS/RJF Reviewed MNH

Generalized Hydraulic Properties of Uppermost Aquifer RPCA Surface Impoundment Rush Island Energy Center, Jefferson County, MO

	RCPA Compliance Wells Only												
	(MW-1, MW-2, MW-3, MW-4, MW-5, MW-6, MW-7)												
			- · · · · ·										
		Average	Estimated	Mean	Mean								
Baseline	Baseline	Groundwater	Hydraulic	Hydraulic	Hydraulic	Estimated	Estimated						
Sampling	Sampling	flow Direction	Gradient	Conductivity	Conductivity	Effective	Velocity						
Event	Event Date	(Azimuth)	(Feet/Foot)	(Feet/Day)	(cm/sec)	Porosity	(Feet/Day)						
1	3/10/2016	76.8	0.0008	56.22	2.0E-02	0.35	0.14						
2	5/2/2016	265.9	0.0003	56.22	2.0E-02	0.35	0.05						
3	7/14/2016	80.0	0.0011	56.22	2.0E-02	0.35	0.18						
4	9/6/2016	67.5	0.0006	56.22	2.0E-02	0.35	0.10						
5	11/15/2016	77.2	0.0011	56.22	2.0E-02	0.35	0.18						
6	1/19/2017	67.0	0.0008	56.22	2.0E-02	0.35	0.12						
7	3/6/2017	68.3	0.0003	56.22	2.0E-02	0.35	0.05						
8	6/8/2017	98.3	0.0004	56.22	2.0E-02	0.35	0.06						

Estimated Results (USEPA Tool)					
Resultant Groundwater Flow Direction (Azimuth)	75				
Estimated Annual Net Movement (Feet/Year)	33				

Prepared By: JSI Checked By: AC Reviewed By: MNH

Notes:

- 1. Azimuth and Hydraulic Gradient calculated using the United States Environmental protection agency (USEPA) On-Line Tools for Site Assessment Calculation for Hydraulic Gradient (magnitude and direction) available at https://www3.epa.gov/ceampubl/learn2model/part-two/onsite/gradient4plus-ns.html
- 2. Hydraulic conductivity value is the geometric mean of slug test results for the RCPA compliance wells.
- 3. An effective porosity of 0.35 was used based on grain size distributions and published values (Fetter 2000, Cohen 1953, and Johnson 1967) .
- 4. Azimuth is measured clockwise in degrees from north.
- 5. cm/sec centimeters per second.

Monitoring Well Construction Details RCPA Surface Impoundment Rush Island Energy Center, Jefferson County, MO

		Location ⁴		Top of Casing Elevation	Ground Surface Elevation	Top of Screen	Bottom of Screen	Base of Well	Total Depth
Well ID	Date Installed	Northing	Easting	(FT MSL) ⁵	(FT MSL) ⁵	(FT MSL) ⁵	(FT MSL) ⁵	(FT MSL) ⁵	(FT BGS) ⁵
MW-1	10/31/2015	835384.2	889832.5	395.52	393.5	320.7	310.9	310.5	83.0
MW-2	11/1/2015	834261.5	890364.1	393.87	391.7	319.5	309.7	309.3	82.4
MW-3	10/31/2015	833178.4	890892.7	391.38	389.2	319.1	309.3	308.9	80.3
MW-4	10/30/2015	831647.5	890830.5	392.78	390.8	310.9	301.1	300.7	90.1
MW-5	10/29/2015	831994.9	889984.5	390.36	388.0	333.0	328.2	327.8	60.2
MW-6	10/28/2015	833111.0	888977.0	402.71	401.1	346.4	341.6	341.2	59.8
MW-7	10/28/2015	834476.8	888483.3	407.95	406.1	318.1	308.3	307.9	98.2
MW-B1	10/28/2015	837602.1	887903.9	411.61	409.6	319.8	310.0	309.6	100.0
MW-B2	10/27/2015	837801.7	885337.2	397.85	395.9	318.3	308.5	308.1	87.9

Notes:

- 1.) All elevations and coordinates were surveyed on December 1, 2015 by Zahner and Associates, Inc.
- 2.) FT MSL = Feet Above Mean Sea Level.
- 3.) FT BGS = Feet Below Ground Surface.
- 4.) Horizontal Datum: State Plane Coordinates NAD83 (2000) Missouri East Zone Feet.
- 5.) Vertical Datum: NAVD88 Feet.

Prepared By: JS Checked By: JSI Reviewed By: MNH

Groundwater Quality Monitoring Parameters RCPA Surface Impoundment

Rush Island Energy Center, Jefferson County, MO

	Monitoring Parameter		Detection ³	Assessment ⁴
Field Parameters	Temperature, pH, Conductivity and Dissolved Oxygen	Х	Х	Х
Appendix III ¹	Boron	X	Х	X
	Calcium	Х	Х	Х
	Chloride	Х	Х	Х
	Fluoride	Х	Х	Х
	Sulfate	Х	Х	Х
	рН	Х	Х	Х
	Total Dissolved Solids (TDS)	Х	Х	Х
	Antimony	X		X
Appendix IV ¹	Arsenic	Х		Х
	Barium	Х		Х
	Beryllium	Х		Х
	Cadmium	Х		Х
	Chromium	Х		Х
	Cobalt	Х		Х
	Fluoride	Х		Х
	Lead	Х		Х
	Lithium	Х		Х
	Mercury	Х		Х
	Molybdenum	Х		Х
	Selenium	Х		Х
	Thallium	Х		Х
	Radium 226 & 228	Х		Х

Notes:

1.) Analyte lists match requirements for monitoring from USEPA Rule 40 CFR parts 257 and 261.

2.) Background will be performed through October 2017 until at least 8 samples are collected.

3.) Approximately 6 months will separate each semi-annual sampling event.

4.) If necessary, assessment monitoring will be performed in accordance with USEPA Rule.

Prepared By: JS Checked By: MWD Reviewed By: MNH

Analytical Methods and Practical Quantitation Limits RCPA Surface Impoundment Rush Island Energy Center, Jefferson County, MO

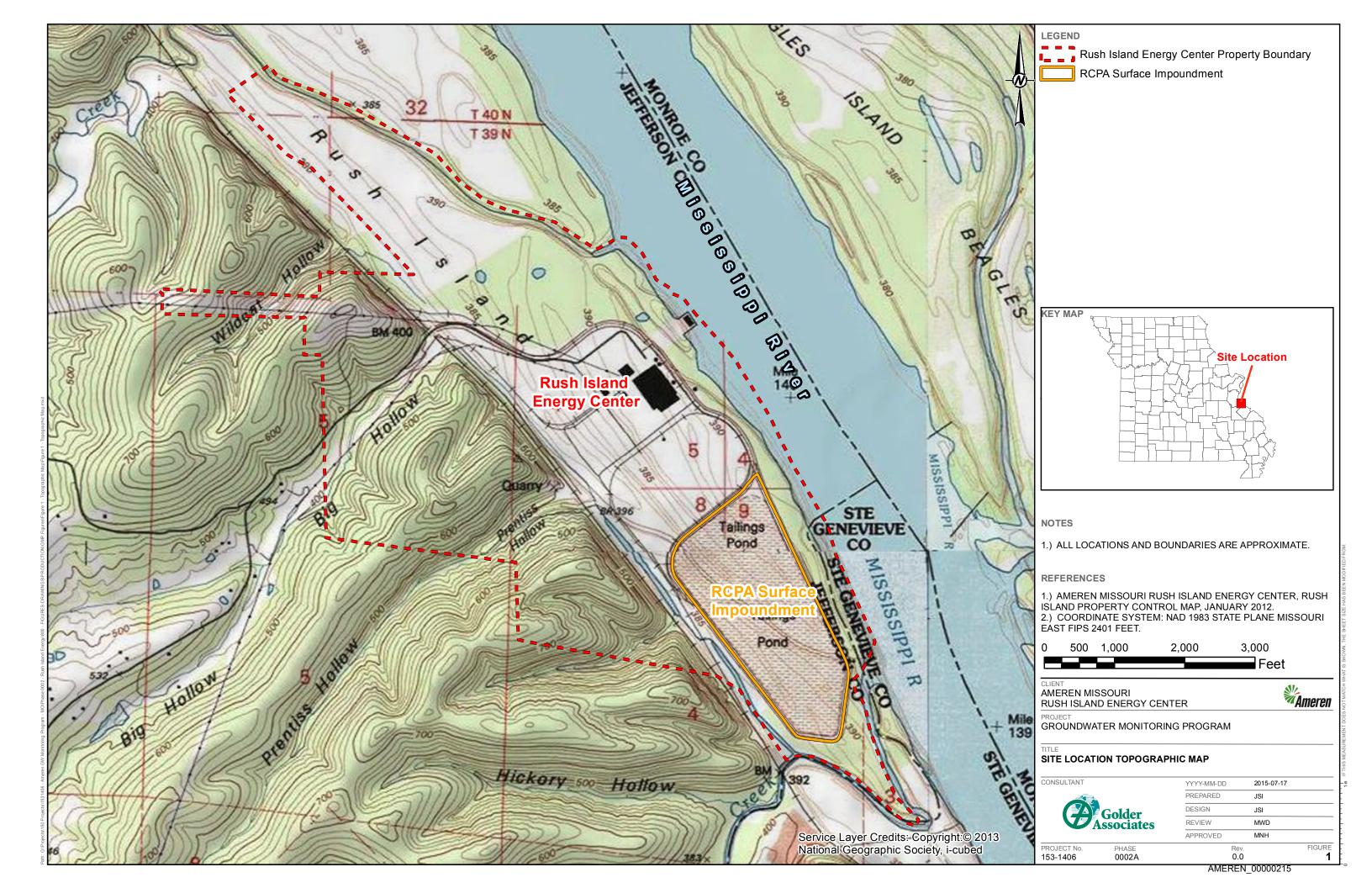
Analyte	Method Reference	Preservative	Hold Times	PQL (μg/L)	MCL (mg/L)		
Appendix III - Detection Monitoring							
Boron	SW-846 6010/MCAWW 200.7	HNO3	6 months	20.0	NA		
Calcium	SW-846 6010/MCAWW 200.7	HNO3	6 months	500.0	NA		
Chloride	EPA 300.0/325.5/MCAWW 300/SW846 9251/9056	NA	28 days	500.0	NA		
Fluoride	EPA 300.0, 300.1	NA	28 days	-	4		
рН	4500 H+B-2000	NA	NA	-	NA		
Sulfate	EPA 300.0/SW846 300	NA	28 days	2000.0	NA		
Total Dissolved Solids (TDS)	2540 C-1997/SM18-20 2540 C	NA	7 days	10000.0	NA		
Appendix IV - Assessment Mo	onitoring			-			
Antimony	SW-846 6010/6020/MCAWW 200.7/200.8	HNO3	6 months	1.0	0.006		
Arsenic	SW-846 6010/6020/MCAWW 200.7/200.8	HNO3	6 months	1.0	0.01		
Barium	SW-846 6010/6020/MCAWW 200.7/200.8	HNO3	6 months	2.0	2		
Beryllium	SW-846 6010/6020/MCAWW 200.7/200.8	HNO3	6 months	1.0	0.004		
Cadmium	SW-846 6010/6020/MCAWW 200.7/200.8	HNO3	6 months	0.5	0.005		
Chromium	SW-846 6010/6020/MCAWW 200.7/200.8	HNO3	6 months	1.5	0.1		
Cobalt	SW-846 6010/6020/MCAWW 200.7/200.8	HNO3	6 months	4.0	NP		
Fluoride	EPA 300.0	N/A	28 days	-	4		
Lead	SW-846 6020	HNO3	6 months	0.005	0.015		
Lithium	SW-846 6010	HNO3	6 months	-	NA		
Mercury	SW-846 7470	HNO3	28 days	-	0.002		
Molybdenum	SW-846 6010	HNO3	6 months	-	NP		
Selenium	SW-846 6010/6020/MCAWW 200.7/200.8	HNO3	6 months	1.0	0.05		
Thallium	SW-846 6010/6020/MCAWW 200.7/200.8	HNO3	6 months	0.2	0.002		
Radium 226 & 228	SW-846 903.1/SM 6500 904	-	-	1.0 (pCi/L)	5.0 (pCi/L)		

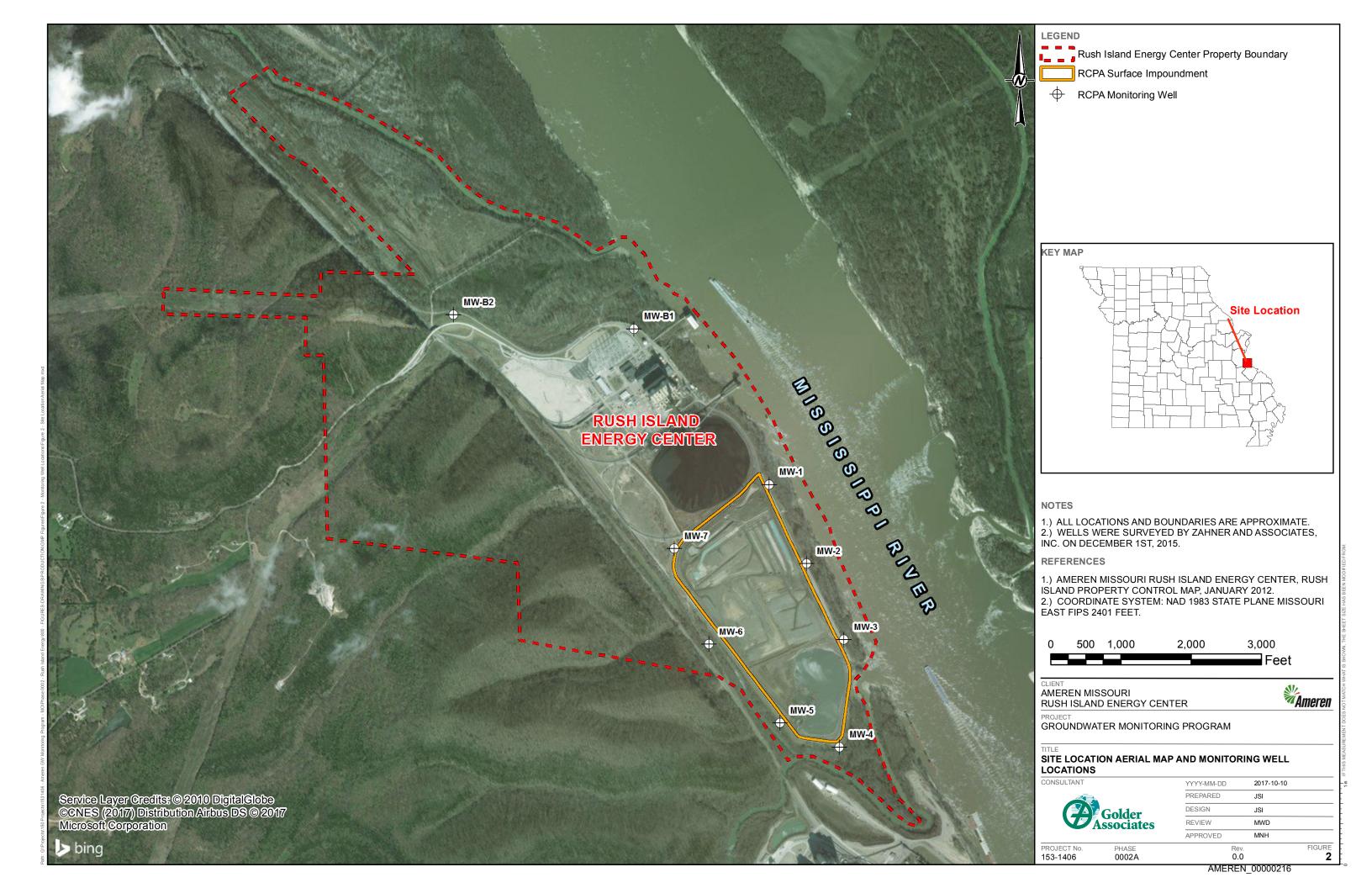
Notes:

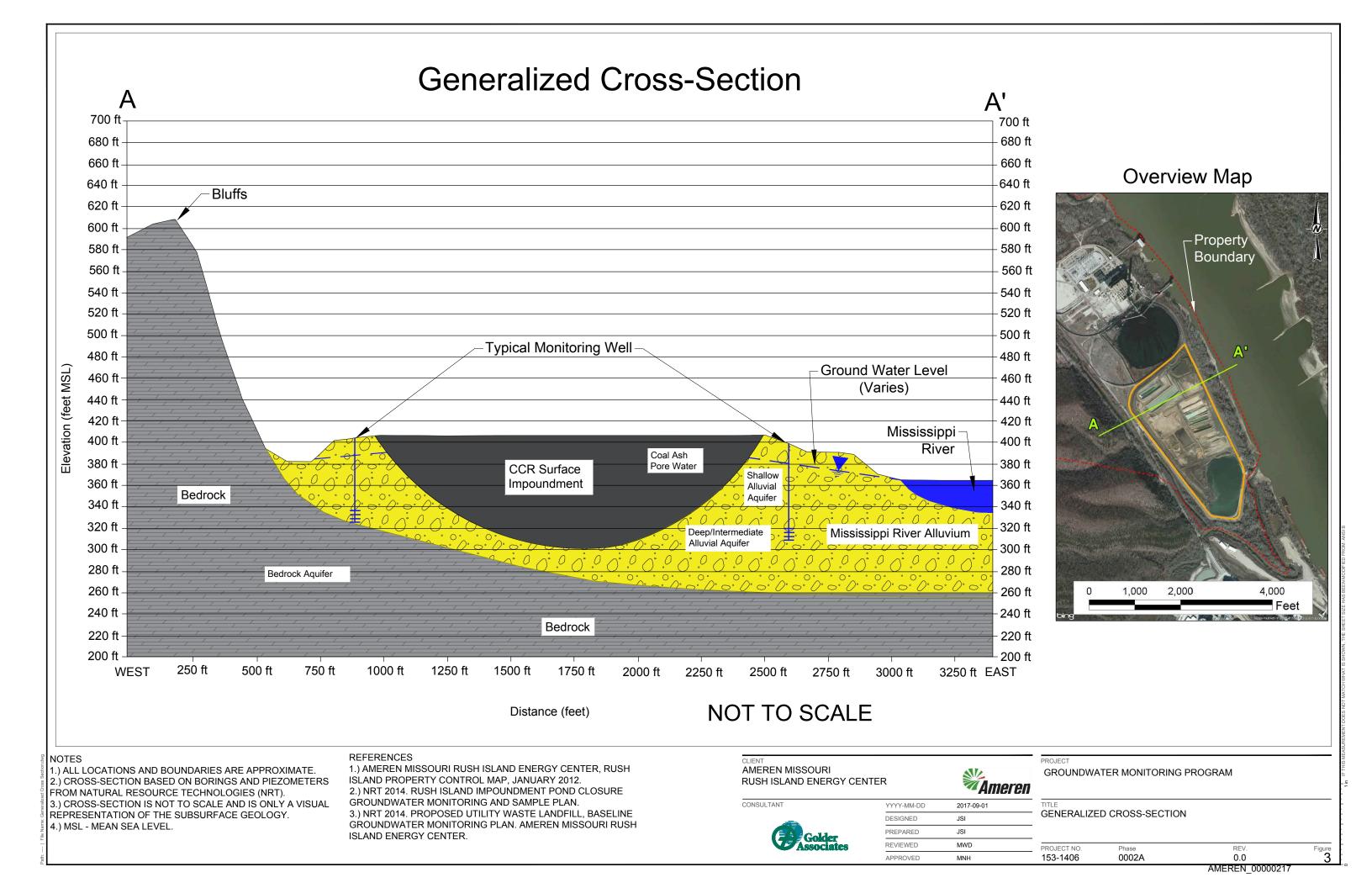
- 1.) NA not applicable.
- 2.) Analyte lists matches requirements for detection and assessment monitoring from United States Environmental Protection Agency (USEPA) Rule 40 CFR parts 257 and 261.
- 3.) SW-846 denotes Test Methods for Evaluating Solid Waste, Physical- Chemical Methods, EPA publication SW-846, 3rd edition, and subsequent updates.
- 4.) MCAWW denotes Methods for the Chemical Analysis of Water and Wastes (MCAWW), United States Environmental Protection Agency (USEPA) published in the 1983.
- 5.) EPA 300 denotes Methods for the Determination of Organic Compounds in Drinking Water Environmental Monitoring Systems Laboratory, Office of Research and Development, USEPA, Cincinnati, Ohio 45268. EPA-300/4-88/039, December 1988 (Revised July 1991).
- 6.) SM18-20 denotes Standard Methods for the Examination of Water and Wastewater, 18th, 19th, and 20th Editions, published by the American Public Health Association, Water Environment Federation, and the American Water Works Association.
- 7.) Other industry-used or agency-approved methods may be used provided that they produce the necessary level of precision and accuracy for data use and reporting.
- 8.) Updates to the methods listed here are approved for use.
- 9.) PQL Practical Quantitation Limit.
- 10.) MCL Maximum Contaminant Level from USEPA 2014 Edition of the Drinking Water Standards and Health Advisories. October 2014. http://water.epa.gov/drink/contaminants/index.cfm.
- 11.) Dash (-) Indicates no information available.
- 12.) μg/L Micrograms per liter.
- 13.) pCi/L Picocuries per liter.
- 14.) NP Not Promulgated.
- 15.) mg/L Milligrams per liter.

Prepared By: JS Checked By: MWD Reviewed By: MRS

FIGURES







APPENDIX A CCR Monitoring Well Boring Logs

RECORD OF BOREHOLE MW-1 SHEET 1 of 3 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/31/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 393.50 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 835,384.16 E: 889,832.52 SAMPLES **BORING METHOD** SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS NUMBER DESCRIPTION TYPE USCS DEPTH - 0 (0.0-6.0) (CL) SILTY CLAY, low to medium plasticity fines, trace fine sand, trace organics (roots); moderate yellowish brown (10YR 5/4); cohesive, w<PL, soft 5.0 5.0 1 SO 390.5 CL (3.0) SAA (Same As Above) except, medium plasticity fines; dark yellowish brown (10YR 4/2); w~PL 3.0 - 5 (6.0-13.5) (CL-ML) SILTY CLAY to SILT, low plasticity fines, some fine sand; medium dark gray (N4) to brownish gray (5YR 4/1); cohesive, w<PL, firm CL-ML 10 3.2 5.0 SO 3 (13.5-24.8) (SP-SM) SAND, fine sand, some non-plastic fines; moderate yellowish brown (10YR 4/2); non-cohesive, dry, compact Sonic 378.5 - 15 (15.0) SAA except, some non-plastic fines, trace low 6 plasticity fines; moist 4 SO SP-SM 373.5 - 20 (20.0) SAA except, some <2 inch layers of medium 20.0 plasticity fines seams; medium gray (N5) RIEC LOGS.GPJ GLDR_CO.GDT 5 SO (24.8-30.0) (SW) SAND, fine to coarse sub-rounded - 25 Run #6, Sluff in run which added recovery. Measured field recovery: 4.7/5.0. Estimated actual recovery: 3.9/5.0. sand, some fine to coarse sub-rounded to sub-angular gravel; dark yellowish orange (10YR 6/6); non-cohesive, wet, compact SW 3.9 5.0 SO 6 RECORD OF Water Level 28.89 ft bgs 11/5/15 363.5 Log continued on next page SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder

REVIEWED: PJJ/MNH

10/9/17

BOREHOLE MWD

GOLDER STL

DRILLER: J. Drabek

Associates

RECORD OF BOREHOLE MW-1 SHEET 2 of 3 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/31/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 393.50 AZIMUTH: N/A INCLINATION: -90 COORDINATES: N: 835,384.16 E: 889,832.52 LOCATION: Rush Island Energy Center SOIL/ROCK PROFILE SAMPLES **BORING METHOD** DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS NUMBER DESCRIPTION TYPE USCS DEPTH (ft) - 30 (30.0-32.4) (SP) SAND, fine to medium sub-rounded sand; dark yellowish orange (10YR 6/6); non-cohesive, 30.0 SP (32.4-36.5) (SW) SAND, fine to coarse sub-rounded sand, some fine to coarse sub-rounded to sub-angular gravel; medium gray (N5); non-cohesive, wet, compact SW <u>9.0</u> 10.0 - 35 7 SO (36.5-38.8) (CL) SILTY CLAY, medium to high plasticity fines, trace fine sand; medium gray (N5); cohesive, CL 354.7 38.8 (38.8-40.0) (SP) SAND, fine to medium sub-rounded sand, trace fine sub-rounded gravel; medium gray (N5); SP non-cohesive, wet, compact 40 (40.0-60.0) (SW) SAND, fine to coarse sand, some Run #8. Driller notes that poor recovery sub-rounded to sub-angular gravel, trace low plasticity fines; medium gray (N5); non-cohesive, wet, compact likely due to soft saturated sands which pushed sand out of the way instead of into the sampler. Driller changes bit to try to get better recovery. Sonic 3.5 10.0 - 45 8 SO 6 RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 - 50 SW - 55 9 SO RECORD OF BOREHOLE MWD 333.5 Log continued on next page GOLDER STL SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-1 SHEET 3 of 3 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/31/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 393.50 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 835,384.16 E: 889,832.52 SOIL/ROCK PROFILE SAMPLES **BORING METHOD** DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS DESCRIPTION NUMBER TYPE USCS DEPTH (ft) - 60 60.0 (60.0-70.0) (SP) SAND, fine to medium sub-rounded sand, some sub-rounded gravel, trace non-plastic fines; medium gray (N5); non-cohesive, wet, compact - 65 SP 10 SO 70 Run #11, poor recovery on the first sample run, most of sample fell out. Driller re-deploys sampler and collects remaining sample. Driller notes sample is likely mixed up after multiple attempts. (70.0-83.0) (SW) SAND, fine to coarse, sub-rounded sand, some sub-rounded gravel; medium gray (N5); non-cohesive, wet, compact Sonic 6 - 75 11 SO SW RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 - 80 12 SO (83.0-85.0) (SP-SM) SAND, fine to medium sand, some non-plastic fines; medium dark gray (N4); non-cohesive, wet, compact SP-SM - 85 BORING TERMINATED AT 85.0 FT BELOW GROUND SURFACE.
FOR WELL DETAILS, SEE WELL CONSTRUCTION GOLDER STL RECORD OF BOREHOLE MWD LOGGED: JSI/JS SCALE: 1 in = 3.8 ft DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-2 SHEET 1 of 3 PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DRILLING METHOD: 6" Sonic DATUM: NAVD88 ELEVATION: 391.70 DRILLING DATE: 11/1/2015 DRILL RIG: Mini Sonic (CDD 1415) AZIMUTH: N/A INCLINATION: -90 COORDINATES: N: 834,261.51 E: 890,364.13 LOCATION: Rush Island Energy Center SAMPLES SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS NUMBER DESCRIPTION TYPE USCS DEPTH (ft) - 0 (0.0-0.3) (CL) SILTY CLAY, medium plasticity fines, some fine sand; light brown (5YR 5/4) to dark yellowish 391.4 0.3 Run #1, Silty clay swells after being brought to the surface which caused over-recovery. Measured field recovery: 5.4/5.0. Estimated actual recovery: 5.0/5.0. brown (10YR 4/2); cohesive, w~PL, firm (0.3-6.7) (CL) SILTY CLAY, medium plasticity fines, trace fine sand; dark yellowish brown (10YR 4/2); cohesive, w~PL firm 1 SO CL 386.7 - 5 (5.0) SAA (Same As Above) except, some organics (roots and wood fragments); moderate brown (5YR 4/4) 385.0 6.7 (6.7-21.3) (SP-SM) SAND, fine sand, some non-plastic fines; moderate yellowish brown (10YR 5/4); 4.7 5.0 non-cohesive, dry, compact 10 Run #3, Sample appears to be compacted while being extruded into sample bags. Measured field recovery: 3.1/5.0. Estimated actual recovery: 4.0/5.0. SO 3 SP-SM Sonic 376.7 - 15 (15.0) SAA except, some very low plasticity fines, wet 6 4 SO 10/9/17 - 20 CO.GDT (21.3-22.6) (SP) SAND, fine to medium sub-rounded sand, trace non-plastic fines; medium dark gray (N4); SP non-cohesive, wet, compact RIEC LOGS.GPJ GLDR (22.6-25.3) (SP-SM) SAND, fine sand, some non-plastic to very low plasticity fines; medium dark gray (N4); non-cohesive, wet, compact SP-SM - 25 5 SO 366.4 25.3 (25.3-28.1) (SP) SAND, fine to medium sub-rounded sand, trace non-plastic fines, trace organics (wood fragments); medium dark gray (N4); non-cohesive, wet, BOREHOLE MWD compact SP (28.1-29.1) (SC) CLAYEY SAND, fine sand, low SC plasticity fines; medium dark gray (N4); non-cohesive, RECORD OF SP 361.7 Log continued on next page GOLDER STL SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH **Associates**

RECORD OF BOREHOLE MW-2 SHEET 2 of 3 DRILLING METHOD: 6" Sonic DRILLING DATE: 11/1/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 391.70 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 834,261.51 E: 890,364.13 SAMPLES SOIL/ROCK PROFILE **BORING METHOD** DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS DESCRIPTION NUMBER TYPE USCS DEPTH (ft) - 30 30.0 (29.1-36.9) (SP) SAND, fine to medium sub-rounded sand, trace non-plastic fines; medium dark gray (N4); non-cohesive, wet, compact (Continued) (30.0) SAA except, trace fine sub-rounded gravel; medium gray (N5) SP <u>9.3</u> 10.0 - 35 6 SO (36.9-40.0) (CL) SILTY CLAY, medium to high plasticity fines, trace fine sand; medium gray (N5); cohesive, w>PL, stiff CL 40 (40.0-85.0) (SW) SAND, fine to coarse sub-rounded sand, trace non-plastic fines, trace sub-rounded gravel; medium gray (N5); non-cohesive, wet, compact Sonic - 45 SO 6 RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 - 50 SW 9.1 10.0 SO - 55 8 GOLDER STL RECORD OF BOREHOLE MWD Log continued on next page SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-2 SHEET 3 of 3 DRILLING METHOD: 6" Sonic DRILLING DATE: 11/1/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 391.70 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 834,261.51 E: 890,364.13 SAMPLES SOIL/ROCK PROFILE **BORING METHOD** DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS DESCRIPTION NUMBER TYPE USCS DEPTH - 60 (40.0-85.0) (SW) SAND, fine to coarse sub-rounded sand, trace non-plastic fines, trace sub-rounded gravel; medium gray (N5); non-cohesive, wet, compact (Continued) Run #9, Sample appears to be compacted while being extruded into sample bags.

Measured field recovery: 4.7/10.0.
Estimated actual recovery: 6.0/10.0. <u>4.7</u> 10.0 - 65 9 SO 321.7 - 70 (70.0) SAA except, some fine to coarse sub-rounded 70.0 Sonic SW 6 7.0 10.0 - 75 10 SO (77.0) SAA except, less coarse sand RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 311.7 - 80 (80.0) SAA except, more coarse sand 80.0 11 SO - 85 BORING TERMINATED AT 85.0 FT BELOW GROUND SURFACE.
FOR WELL DETAILS, SEE WELL CONSTRUCTION
LOG MW-2. GOLDER STL RECORD OF BOREHOLE MWD LOGGED: JSI/JS SCALE: 1 in = 3.8 ft DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-3 SHEET 1 of 3 PROJECT: Ameren CCR GW Monitoring DRILLING METHOD: 6" Sonic DATUM: NAVD88 ELEVATION: 389.18 DRILLING INIE 1103. C Conic DRILLING DATE: 10/31/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT NUMBER: 153-1406.0002A AZIMUTH: N/A INCLINATION: -90 COORDINATES: N: 833,178.44 E: 890,892.65 LOCATION: Rush Island Energy Center SAMPLES SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS BORING NUMBER DESCRIPTION USCS TYPE DEPTH - 0 (0.0-3.3) (CL) SILTY CLAY, medium plasticity fines, trace fine sand, trace sub-angular gravel, some organics (roots); dark yellowish brown (10YR 4/4); cohesive, w<PL, firm CL 1 SO 385.9 3.3 (3.3-6.5) (CL-ML) SILTY CLAY, low plasticity fines, some fine sand; dark yellowish brown (10YR 5/4); cohesive, CL-ML - 5 (6.5-11.7) (ML) sandy SILT, non-plastic fines, fine sand; moderate yellowish brown (10YR 5/4); non-cohesive, SO ML 10 (11.7-12.4) (CL) sandy SILTY CLAY, low to medium CL plasticity fines, fine sand; dark yellowish brown (10YR 4/2) to medium gray (N5); cohesive, w~PL, soft 4.4 5.0 SO 3 (12.4-15.0) (ML) sandy SILT, non-plastic fines, fine sand; light brownish gray (5YR 6/1) to medium gray (N5); non-cohesive, moist, compact ML Sonic 15 (15.0-18.3) (ML) sandy CLAYEY SILT, low plasticity fines, fine sand; brownish gray (5YR 4/1) to medium gray (N5); cohesive, w<PL, soft ML SO (18.3-19.6) (CL) SILTY CLAY, medium plasticity fines, some fine sand; medium gray (N5); cohesive, w~PL, soft CL (19.6-20.0) (ML) sandy SILT, non-plastic fines, fine ML 20 sand; medium gray (N5); non-cohesive, wet, compact 369.2 20.0 (20.0-21.3) (CL) SILTY CLAY, medium to high plasticity CL fines, trace fine sand; brownish gray (5YR 4/1); CO.GDT cohesive, w>PL, stiff (21.3-22.3) (ML) sandy CLAYEY SILT, low to non-plastic fines, fine sand; medium gray (N5); cohesive, w<PL, soft ML(22.3-25.0) (CL) SILTY CLAY, low plasticity fines, trace fine sand; medium gray (N5); cohesive, W<PL, soft CI 364.2 25.0 - 25 5 SO (25.0-25.6) (SP-SM) SAND, fine to medium sub-rounded SP-SM sand, non-plastic fines, trace organics (wood fragments); medium gray (N5); non-cohesive, wet, loose (25.6-26.2) (CL) SILTY CLAY, low plasticity fines, trace fine sand; medium gray (N5); cohesive, w<PL, soft CL 25.6 ft bgs 11/4/15 SP-SM 26.2 362.5 (26.2-26.7) (SP-SM) SAND, fine sand, non-plastic fines; 26.7 medium gray (N5) to brownish gray (5YR 4/1); non-cohesive, wet, compact 362.2 27.0 (26.7-29.5) (CL) SILTY CLAY, low to medium plasticity CL fines, trace fine sand; medium gray (N5); cohesive, RECORD OF w~PL, soft (27.0-27.2) - 2 inch silty SAND seam (29.5-30.0) (SP) SAND, fine sand, some non-plastic SP 30 Log continued on next page SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

GLDR

RIEC LOGS.GPJ

BOREHOLE MWD

RECORD OF BOREHOLE MW-3 SHEET 2 of 3 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/31/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 389.18 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 833,178.44 E: 890,892.65 SAMPLES SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS DESCRIPTION NUMBER TYPE USCS DEPTH (ft) - 30 Run #6, Sample appears to be compacted while being extruded into sample bags. Measured field recovery: 6.5/10.0 Estimated actual recovery: 8.0/10.0. 359.2 fines; medium gray (N5); non-cohesive, wet, compact 30.0 (30.0-80.3) (SW) SAND, fine to coarse sub-rounded sand, trace non-plastic fines, trace sub-rounded gravel; medium gray (N5); non-cohesive, wet, compact - 35 6 SO 40 Run #7, Sample appears to be compacted while being extruded into sample bags. Measured field recovery: 7.5/10.0 Estimated actual recovery: 8.5/10.0. Sonic - 45 SW SO RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 - 50 SO - 55 8 GOLDER STL RECORD OF BOREHOLE MWD 329.2 Log continued on next page LOGGED: JSI/JS SCALE: 1 in = 3.8 ft DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-3 SHEET 3 of 3 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/31/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 389.18 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 833,178.44 E: 890,892.65 SAMPLES **BORING METHOD** SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS REC ATT DESCRIPTION NUMBER TYPE USCS DEPTH (ft) - 60 (30.0-80.3) (SW) SAND, fine to coarse sub-rounded sand, trace non-plastic fines, trace sub-rounded gravel; medium gray (N5); non-cohesive, wet, compact (Continued) (60.0) SAA (Same as Above) except, some fine to coarse sub-rounded to sub-angular gravel 60.0 <u>6.7</u> 10.0 - 65 9 SO 319.2 Sonic - 70 SW (70.0) SAA except, less coarse sand, trace sub-rounded 70.0 gravel - 75 9<u>.5</u> 10.3 10 SO GOLDER STL RECORD OF BOREHOLE MWD RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 - 80 BORING TERMINATED AT 80.3 FT BELOW GROUND SURFACE.
FOR WELL DETAILS, SEE WELL CONSTRUCTION - 85 LOGGED: JSI/JS SCALE: 1 in = 3.8 ft DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-4 SHEET 1 of 4 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/30/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 390.82 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 831,647.50 E: 890,830.51 SAMPLES **BORING METHOD** SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS REC ATT NUMBER DESCRIPTION TYPE USCS DEPTH (ft) - 0 (0.0-1.2) (CL-ML) SILTY CLAY to SILT, low plasticity fines, trace fine sand, some organics (roots); dusky brown (5YR 2/2); cohesive, w<PL, soft CL-ML 389.6 1.2 (1.2-1.9) (CL) sandy SILTY CLAY, medium plasticity fines, fine sand; grayish brown (5YR 3/2); cohesive, CL 388.9 (1.9-5.0) (CL) SILTY CLAY, medium plasticity fines, fine 1 SO sand; dark yellowish brown (10YR 4/2); cohesive, w<PL, CL 385.8 5.0 - 5 (5.0-14.0) (SM) SILTY SAND, fine sand, non-plastic fines; moderate yellowish brown (10YR 5/4); non-cohesive, dry, loose SO SM 10 4.2 5.0 SO 3 376.8 14.0 (14.0-29.6) (CL) sandy SILTY CLAY, low plasticity fines, fine sand; medium gray (N5) to light brownish gray (5YR 6/1); cohesive, w<PL, soft Sonic - 15 6 370.8 - 20 4 SO (20.0) SAA (Same as Above) except, some (~10%) fine sand seams up to ~4 inches thick RIEC LOGS.GPJ GLDR_CO.GDT CL - 25 RECORD OF BOREHOLE MWD 363.5 27.3 5.0 5.0 (27.3) SAA except, medium gray (N5) SO 5 Log continued on next page SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

10/9/17

RECORD OF BOREHOLE MW-4 SHEET 2 of 4 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/30/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 390.82 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 831,647.50 E: 890,830.51 SAMPLES SOIL/ROCK PROFILE **BORING METHOD** DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS DESCRIPTION NUMBER TYPE USCS DEPTH - 30 (29.6-43.0) (SP) SAND, fine sand, trace non-plastic fines; olive gray (5Y 3/2); non-cohesive, wet, compact (Continued) - 35 6 SO SP 40 Run #7, Sample appears to be compacted while being extruded into sample bags. Measured field recovery: 6.0/10.0 Estimated actual recovery: 9.0/10.0. (43.0-70.0) (SW) SAND, fine to coarse sub-rounded sand, trace non-plastic fines, trace fine sub-rounded gravel; medium gray (N5); non-cohesive, wet, compact. Sonic - 45 7 SO 6 GOLDER STL RECORD OF BOREHOLE MWD RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 - 50 Run #8, Sample appears to be compacted while being extruded into sample bags.

Measured field recovery: 6.0/10.0 Estimated actual recovery: 8.0/10.0. SW SO - 55 8 Log continued on next page SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-4 SHEET 3 of 4 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/30/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 390.82 AZIMUTH: N/A INCLINATION: -90 COORDINATES: N: 831,647.50 E: 890,830.51 LOCATION: Rush Island Energy Center SAMPLES **BORING METHOD** SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS NUMBER DESCRIPTION TYPE USCS DEPTH - 60 Run #9, Driller notes that poor recovery is likely caused by the sands being pushed out and not coming into the sampler. Driller swithes bit to try to fix the problem. (43.0-70.0) (SW) SAND, fine to coarse sub-rounded sand, trace non-plastic fines, trace fine sub-rounded gravel; medium gray (N5); non-cohesive, wet, compact. (Continued) <u>2.0</u> 10.0 - 65 SW 9 SO 70 (70.0-73.8) (CL) SILTY CLAY, medium plasticity fines, some fine sand; medium gray (N5); cohesive, w<PL, firm CL (73.8-76.0) (CL & SP) SILTY CLAY and SAND, medium plasticity fines and fine sand; medium gray (N5); cohesive, w<PL, soft Sonic CL & SP - 75 10 SO 6 (76.0-78.1) (SC) CLAYEY SAND, fine sand, low plasticity fines; medium gray (N5); cohesive, w<PL, soft SC (78.1-82.0) (SP-SM) SAND, fine sand, some non-plastic to low plasticity fines; medium gray (N5); non-cohesive, wet. loose 10/9/17 - 80 SP-SM RIEC LOGS.GPJ GLDR_CO.GDT 308.8 82.0 (82.0-90.1) (SW) SAND, fine to coarse sub-rounded sand, trace fine to coarse sub-rounded gravel, trace low plasticity fines seams (up to ~2 inches thick); medium gray (N5); non-cohesive, wet, compact - 85 11 SO BOREHOLE MWD SW RECORD OF Log continued on next page GOLDER STL SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-4 SHEET 4 of 4 PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A LOCATION: Rush Island Energy Center DRILLING METHOD: 6" Sonic DRILLING DATE: 10/30/2015 DRILL RIG: Mini Sonic (CDD 1415) DATUM: NAVD88 AZIMUTH: N/A ELEVATION: 390.82 COORDINATES: N: 831,647.50 E: 890,830.51 **BORING METHOD** SAMPLES SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS DESCRIPTION NUMBER USCS TYPE DEPTH (ft) - 90 300.7 90.1 BORING TERMINATED AT 90.1 FT BELOW GROUND SURFACE.
FOR WELL DETAILS, SEE WELL CONSTRUCTION LOG MW-4. - 95 - 100 - 105 GOLDER STL RECORD OF BOREHOLE MWD RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 - 110 - 115 LOGGED: JSI/JS SCALE: 1 in = 3.8 ft DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-5 SHEET 1 of 3 PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DRILLING METHOD: 6" Sonic DATUM: NAVD88 ELEVATION: 388.00 DRILLING INIE 11029/2015
DRILL RIG: Mini Sonic (CDD 1415) AZIMUTH: N/A INCLINATION: -90 COORDINATES: N: 831,994.91 E: 889,984.54 LOCATION: Rush Island Energy Center SAMPLES SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS BORING NUMBER DESCRIPTION USCS TYPE DEPTH (ft) - 0 (0.0-1.5) (ML) sandy SILT, non to low plasticity fines, fine sand; dark yellowish brown (10YR 4/2); ML non-cohesive, loose, dry 386.5 1.5 (1.5-7.5) (ML) sandy CLAYEY SILT, low plasticity fines, fine sand, trace organics (roots); brownish gray (5YR 4/1) mottled with light brown (5YR 5/6); cohesive, w<PL, 2.9 5.0 1 SO ML - 5 380.5 7.5 (7.5-12.0) (CL) SILTY CLAY, medium plasticity fines, trace fine sand, trace organics (roots); brownish gray (5YR 4/1) to medium gray (N5); cohesive, w~PL, firm CL 10 (12.0-12.4) (SM) SILTY SAND, fine sand, non-plastic SM 4.5 5.0 fines; brownish gray (5YR 4/1); non-cohesive, wet, 375.6 3 SO CI 12.4 374.8 (12.4-13.2) (CL) SILTY CLAY, medium plasticity fines, SM trace fine sand, trace organics (roots); brownish gray (5YR 4/1) to medium gray (N5); cohesive, w~PL, firm (13.2-13.6) (SM) SILTY SAND, fine sand, non-plastic 374.4 CL 13.6 Sonic fines; brownish gray (5YR 4/1); non-cohesive, wet, 14.5 - 15 (13.6-14.5) (CL) SILTY CLAY, medium plasticity fines, trace fine sand; brownish gray (SYR 4/1) to medium gray (N5); cohesive, w~PL, firm (14.5-16.4) (SM) SILTY SAND, fine sand, non-plastic first black (SYR 4/1), and substition of the sand of the SM fines; brownish gray (5YR 4/1); non-cohesive, wet, 4 SO (16.4-18.8) (ML) sandy SILT, non-plastic fines, fine sand; brownish gray (5YR 4/1); non-cohesive, wet, М 369.2 18.8 (18.8-20.0) (CL) SILTY CLAY, low to medium plasticity fines, some fine sand; medium gray (N5); cohesive, CI 20 (20.0-22.0) (SM) SILTY SAND, fine sand, non-plastic fines; light brownish gray (5YR 6/1); non-cohesive, wet, CO.GDT SM 366.0 22.0 (22.0-26.5) (ML) sandy CLAYEY SILT, low plasticity fines, fine sand; medium gray (N5); cohesive, w<PL, soft ft bgs 11/10/15 ML 8.4 10.0 - 25 5 SO (26.5-40.0) (SP-SM) SAND, fine sand, some non-plastic nes; medium gray (N5); non-cohesive, wet, compact SP-SM RECORD OF 358.0 Log continued on next page SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RIEC LOGS.GPJ GLDR

BOREHOLE MWD

RECORD OF BOREHOLE MW-5 SHEET 2 of 3 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/29/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 388.00 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 831,994.91 E: 889,984.54 SAMPLES SOIL/ROCK PROFILE **BORING METHOD** DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS DESCRIPTION NUMBER TYPE USCS DEPTH (ft) - 30 (26.5-40.0) (SP-SM) SAND, fine sand, some non-plastic fines; medium gray (N5); non-cohesive, wet, compact 30.0 (Continued) (30.0) SAA (Same As Above), trace low plasticity fines <u>8.2</u> 10.0 - 35 SP-SM 6 SO 40 (40.0-41.8) (SM) SILTY SAND, fine sand, non-plastic fines; medium gray (N5); non-cohesive, wet, compact SM (41.8-43.4) (CL) SILTY CLAY, medium plasticity fines, some fine sand; medium gray (N5); cohesive, w~PL, firm 41.8 CL (43.4-50.0) (SP) SAND, fine sand, trace non-plastic fines; medium gray (N5); non-cohesive, wet, compact Sonic 9.3 10.0 - 45 7 SO 6 SP GOLDER STL RECORD OF BOREHOLE MWD RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 - 50 (50.0-64.0) (SW) SAND, fine to coarse sub-rounded sand, trace fine sub-rounded gravel; medium gray (N5); non-cohesive, wet, compact 9.2 10.0 SO - 55 SW 8 328.0 Log continued on next page SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-5 SHEET 3 of 3 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/29/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 388.00 AZIMUTH: N/A INCLINATION: -90 COORDINATES: N: 831,994.91 E: 889,984.54 LOCATION: Rush Island Energy Center SAMPLES SOIL/ROCK PROFILE **BORING METHOD** DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS DESCRIPTION NUMBER TYPE USCS DEPTH (ft) - 60 (50.0-64.0) (SW) SAND, fine to coarse sub-rounded sand, trace fine sub-rounded gravel; medium gray (N5); non-cohesive, wet, compact (Continued) (60.0) SAA except, some fine to coarse sub-rounded 60.0 When done drilling, pull up sampling rod up to 60.2 ft bgs and only push outer casing to 60.2 ft bgs in order to set the bottom of the well at 60.2 ft bgs. below 60.2 ft bgs is 6" Sonic 3.2 4.0 SO natural cave in. BORING TERMINATED AT 64.0 FT BELOW GROUND SURFACE. BEDROCK ENCOUNTERED AT 64.0 FEET BELOW GROUND SURFACE. FOR WELL DETAILS, SEE WELL CONSTRUCTION LOG - 65 - 70 - 75 - 80 - 85 SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17

RECORD OF BOREHOLE MWD

RECORD OF BOREHOLE MW-6 SHEET 1 of 3 PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DRILLING METHOD: 6" Sonic DATUM: NAVD88 ELEVATION: 401.08 DRILLING INIETTIOD. 0 GGIIIG DRILLING DATE: 10/28/2015 DRILL RIG: Mini Sonic (CDD 1415) AZIMUTH: N/A INCLINATION: -90 COORDINATES: N: 833,110.97 E: 888,976.95 LOCATION: Rush Island Energy Center SAMPLES SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS BORING NUMBER DESCRIPTION USCS TYPE DEPTH (ft) - 0 400.8 (0.0-0.3) (OL) ORGANIC SILT, non-plastic fines. OL 0.3 organics (roots, etc.), some fine to medium sand; black (N1); non-cohesive, dry, loose SP (0.3-2.0) FILL - (SP) SAND, fine sand, trace non-plastic fines; brownish gray (5YR 4/1); non-cohesive, dry, 399.1 2.0 (2.0-7.0) (SM) SILTY SAND, fine sand, non-plastic fines; moderate yellowish brown (10YR 5/4); non-cohesive, 5.0 5.0 1 SO dry, compact SM - 5 394.1 7.0 (7.0-10.0) (CL) SILTY CLAY, medium plasticity fines, trace fine sand; brownish gray (5YR 4/1); cohesive, w<PL, firm CL 10 (10.0-11.5) (SP) SAND, fine sand, trace non-plastic fines; brownish gray (5YR 4/1); non-cohesive, dry, SP compact 389.6 11.5 (11.5-20.0) (SM) SILTY SAND, fine sand, non-plastic fines; moderate yellowish brown (10YR 5/4); 5.0 5.0 non-cohesive, dry, compact 3 SO 388.1 (13.0) SAA (Same As Above), brownish gray (5YR 4/1) 13.0 Sonic - 15 6 SM 4.5 5.0 SO 10/9/17 20 (20.0-21.0) (CL) SILTY CLAY, medium plasticity fines, some fine sand; brownish gray (5YR 4/1); cohesive, w~PL, soft CI 380.1 21.0 CO.GDT (21.0-22.1) (SC) CLAYEY SAND, fine sand, medium SC plasticity fines; brownish gray (5YR 4/1); cohesive, GLDR (22.1-23.6) (SP-SM) SAND, fine sand, some non-plastic 5 SO fines, trace sub-rounded gravels; brownish gray (5YR 4/1); non-cohesive, moist, compact SP-SM RIEC LOGS.GPJ (23.6-25.0) (CL) SILTY CLAY, medium plasticity fines, some sub-rounded to sub-angular gravel, trace fine sand; medium dark gray (N4); cohesive, w^-PL , firm CL 376.1 25.0 - 25 (25.0-27.5) (SC) CLAYEY SAND, fine sand, medium plasticity fines; brownish gray (5YR 4/1); non-cohesive, moist, compact BOREHOLE MWD SC 4.6 5.0 SO (27.5-30.6) (CL) SILTY CLAY, medium plasticity fines, trace fine sand; light brownish gray (5YR 4/1) to medium 6 gray (N6); cohesive, w<PL, firm RECORD OF CL Log continued on next page GOLDER STL SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-6 SHEET 2 of 3 PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DRILLING METHOD: 6" Sonic DATUM: NAVD88 ELEVATION: 401.08 DRILLING INIETTIOD. 0 GGIIIG DRILLING DATE: 10/28/2015 DRILL RIG: Mini Sonic (CDD 1415) AZIMUTH: N/A INCLINATION: -90 COORDINATES: N: 833,110.97 E: 888,976.95 LOCATION: Rush Island Energy Center SAMPLES SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS BORING NUMBER DESCRIPTION USCS TYPE DEPTH - 30 CL (30.6-33.5) (SM) SILTY SAND, fine sand, non-plastic fines; medium gray (N5) to light olive gray (5Y 5/2); non-cohesive, wet, compact SM (33.5-35.0) (SC) CLAYEY SAND, medium to coarse sub-rounded sand, medium to low plasticity fines; dark yellowish orange (10YR 5/4) and medium gray (N5); SC non-cohesive, wet, compact 10.0 10.0 - 35 7 SO (35.0-36.1) (CL) sandy SILTY CLAY, medium plasticity ft bgs 11/5/15 fines, fine sand; medium gray (N5); cohesive, w<PL, soft CL (36.1-37.9) (SM) SILTY SAND, fine sand, non-plastic fines; medium gray (N5); non-cohesive, wet, compact SM (37.9-41.7) (SP) SAND, fine to medium sub-rounded sand, trace non-plastic fines; medium gray (N5); non-cohesive, wet, compact SP 40 359.4 41.7 (41.7-50.0) (CL) SILTY CLAY, medium to high plasticity fines, trace fine sand; medium gray (N5); cohesive, Sonic 10.0 10.0 - 45 8 SO 6 CL 50 (50.0-51.3) (SP-SM) SAND, fine to medium sub-rounded sand, some non-plastic fines; medium gray (N5); non-cohesive, wet, loose SP-SM CO.GDT (51.3-53.0) (CL) SILTY CLAY, medium to high plasticity fines, trace fine sand; medium gray (N5); cohesive, w~PL, soft CL (53.0-55.0) (SM) SILTY SAND, fine to medium sub-rounded sand, non-plastic fines, trace fine to coarse sub-rounded gravels, trace wood fragments; medium SM gray (N5), non-cohesive, wet, compact 9.0 10.5 - 55 (55.0-59.5) (GW) sandy GRAVEL, sub-angular to sub-rounded gravel, fine to coarse sub-rounded sand, 9 SO some non-plastic fines, trace organics (wood fragments); medium gray (N5) mottled black (N1) (organics); non-cohesive, wet, loose GW RECORD OF Log continued on next page SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

10/9/17

GLDR

RIEC LOGS.GPJ

BOREHOLE MWD

RECORD OF BOREHOLE MW-6 SHEET 3 of 3 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/28/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 401.08 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 833,110.97 E: 888,976.95 SAMPLES SOIL/ROCK PROFILE **BORING METHOD** DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS DESCRIPTION NUMBER TYPE USCS DEPTH (ft) - 60 (59.5-60.5) (GW) sandy GRAVEL Residuum, fine to coarse sub-rounded gravel, fine to coarse sub-rounded sand, some non-plastic fines; pale yellowish brown (10YR 6/2); non-cohesive, wet, loose (Continued) (60.0) Driller starts to feel gravelly residuum shaking the rods. Driller adds additional sample rods and pushes for a 10.5 foot run down to bedrock. GW 9 so BORING TERMINATED AT 60.5 FT BELOW GROUND SURFACE. BEDROCK ENCOUNTERED AT 60.5 FT BELOW GROUND SURFACE. FOR WELL DETAILS, SEE WELL CONSTRUCTION LOG MW-6. - 65 - 70 - 75 GOLDER STL RECORD OF BOREHOLE MWD RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 - 80 - 85 LOGGED: JSI/JS SCALE: 1 in = 3.8 ft DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-7 SHEET 1 of 4 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/28/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 406.06 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 834,476.82 E: 888,483.33 SAMPLES **BORING METHOD** SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS REC ATT DESCRIPTION NUMBER TYPE USCS DEPTH - 0 (0.0-1.0) (OL) ORGANIC SILT, non-plastic fines, organics (roots, etc.), some fine to medium sand; black (N1); non-cohesive, dry, loose (1.0-1.5) FILL - (GP) GRAVEL, coarse angular gravel, some fine to coarse sand; pale yellowish brown (10YR 6/2); non-expective, dry, loose OL 405.1 1.0 404.6 000 GP 1.5 6/2); non-cohesive, dry, loose
(1.5-5.0) (SM) SILTY SAND, fine sand, non-plastic fines; moderate yellowish brown (10YR 5/4); non-cohesive, 403.6 2.7 5.0 1 SO dry, loose
(2.5) SAA (Same As Above) except, trace medium plasticity fines layers (1 Inch thick); medium gray (N5) SM - 5 (5.0-10.0) (SC) CLAYEY SAND, fine sand, low to medium plasticity fines; brownish gray (5G 4/1); non-cohesive, moist, loose 2.7 5.0 SO 10 (10.0-32.0) (CL) SILTY CLAY, medium plasticity fines trace fine sand, trace iron staining; brownish gray (5YR 4/1); cohesive, w~PL, firm 393.6 5.0 5.0 SO 3 (12.5) SAA except, medium to high plasticity fines; medium dark gray (N4) Sonic 391.1 - 15 (15.0) SAA, some fine sand 6 4 SO 386.1 - 20 CL (20.0) SAA except, trace fine sand; medium dark gray 20.0 (N4) to brownish gray (5YR 4/1) RIEC LOGS.GPJ GLDR_CO.GDT 5 SO - 25 5.0 5.0 SO 6 RECORD OF 376.1 Log continued on next page SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

10/9/17

BOREHOLE MWD

RECORD OF BOREHOLE MW-7 SHEET 2 of 4 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/28/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 406.06 AZIMUTH: N/A INCLINATION: -90 COORDINATES: N: 834,476.82 E: 888,483.33 LOCATION: Rush Island Energy Center SAMPLES **BORING METHOD** SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS NUMBER DESCRIPTION TYPE USCS DEPTH (ft) - 30 (10.0-32.0) (CL) SILTY CLAY, medium plasticity fines, trace fine sand, trace iron staining; brownish gray (5YR 4/1); cohesive, w~PL, firm (Continued) (30.0) SAA except, some fine sand 30.0 CL (32.0-34.8) (CL & SP) SILTY CLAY and SAND, medium plasticity fines, fine sand; medium gray (N5) mottled with light brown (5YR 5/6); cohesive, w<PL, soft 7 SO CL & SP (34.8-40.0) (SP) SAND, fine to medium sand, some non-plastic fines; moderate yellowish brown (10YR 5/6); - 35 non-cohesive, wet, compact SP 40 (40.0-52.0) (SW) SAND, fine to coarse sub-rounded (40.0-92.0) (39V) SAND, inter to Cudarse sub-rounders sand, some low plasticity fines (silty clay seams ~1 inch thick), trace fine subrounded gravels; dark yellowish orange (10YR 6/6), brownish gray (5YR 4/1) and medium dark gray (N4); non-cohesive, wet, compact ft bgs 11/6/15 Sonic 10.0 10.0 - 45 9 SO 6 SW 10/9/17 - 50 RIEC LOGS.GPJ GLDR_CO.GDT 354.1 52.0 (52.0-52.5) (GW) sandy GRAVEL, fine to coarse sub-rounded gravel, medium to coarse sub-rounded GW sand; medium dark gray (N4); non-cohesive, wet, compact (52.5-57.0) (SP) SAND, fine sub-rounded sand, some fine sub-rounded gravel, some non-plastic fines; medium dark gray (N4); non-cohesive, wet, compact SP - 55 10 SO BOREHOLE MWD (57.0-59.5) (SC) CLAYEY SAND, fine sand, medium plasticity fines, trace sub-rounded gravels; medium dark gray (N4); non-cohesive, wet, compact SC RECORD OF SW Log continued on next page GOLDER STL SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-7 SHEET 3 of 4 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/28/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 406.06 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 834,476.82 E: 888,483.33 SAMPLES SOIL/ROCK PROFILE **BORING METHOD** DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS DESCRIPTION NUMBER USCS TYPE DEPTH - 60 (59.5-82.3) (SW) SAND, fine to coarse sub-rounded sand, some rounded gravels, trace non-plastic fines; medium dark gray (N4); non-cohesive, wet, compact (Continued) <u>9.0</u> 10.0 - 65 11 SO - 70 SW Sonic 5.0 10.0 - 75 12 SO 6 GOLDER STL RECORD OF BOREHOLE MWD RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 - 80 324.1 82.0 323.8 82.3 (82.0) SAA except, 1 inch black (N1) organic layer (82.3-98.2) (SP) SAND, fine to medium sub-rounded sand, trace sub-rounded gravels, some non-plastic fines; medium gray (N5); non-cohesive, wet, compact - 85 SO 13 SP 316.1 Log continued on next page LOGGED: JSI/JS SCALE: 1 in = 3.8 ft DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-7 SHEET 4 of 4 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/28/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 406.06 COORDINATES: N: 834,476.82 E: 888,483.33 LOCATION: Rush Island Energy Center SAMPLES **BORING METHOD** SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS DESCRIPTION NUMBER TYPE USCS DEPTH (ft) - 90 (82.3-98.2) (SP) SAND, fine to medium sub-rounded sand, trace sub-rounded gravels, some non-plastic fines; medium gray (N5); non-cohesive, wet, compact (Continued) (90.0) SAA except, no gravel 90.0 Sonic SP SO 14 .9 - 95 BORING TERMINATED AT 98.2 FT BELOW GROUND SURFACE.
FOR WELL DETAILS, SEE WELL CONSTRUCTION LOG MW-7. - 100 - 105 GOLDER STL RECORD OF BOREHOLE MWD RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 - 110 - 115 LOGGED: JSI/JS SCALE: 1 in = 3.8 ft DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-B1 SHEET 1 of 4 PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DRILLING METHOD: 6" Sonic DATUM: NAVD88 ELEVATION: 409.55 DRILLING DATE: 10/25/2015 DRILL RIG: Mini Sonic (CDD 1415) AZIMUTH: N/A INCLINATION: -90 COORDINATES: N: 837,602.13 E: 887,903.93 LOCATION: Rush Island Energy Center SAMPLES **BORING METHOD** SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS NUMBER DESCRIPTION TYPE USCS DEPTH (ft) - 0 409.3 0.3 (0.0-0.3) TOPSOIL - (ML) SILT, non-plastic fines, trace _ML_ fine sand, trace organics (roots); medium dark gray (N4); non-cohesive, moist, very loose (0.3-19.0) FILL - (SP) SAND, fine to medium sub-rounded sand, trace non-plastic fines, trace sub-angular gravel; moderate yellowish brown (10YR 5/4); non-cohesive, dry, loose 3.5 5.0 1 SO - 5 SP 399.6 10 (10.0) SAA (Same As Above) except, trace medium plasticity silty clay seams (\sim 0.5 inches thick), no gravel 10.0 SO 3 Sonic - 15 Run #4, not all of the sample was collected on first attempt, some of the sample likely fell out. driller re-deploys sampler to retrieve the remainder of the sample. Sample likely mixed up after multiple attempts. <u>5.0</u> 5.0 4 SO (19.0-21.4) (SC) CLAYEY SAND, fine to medium sub-rounded sand, non to low plasticity fines; medium dark gray (N4); non-cohesive, moist, compact 20 SC RIEC LOGS.GPJ GLDR_CO.GDT (21.4-22.5) (CL & SP) SILTY CLAY and SAND, medium plasticity fines, fine sand; medium dark gray (N4); CL & SP cohesive, w~PL, soft 5 SO (22.5-25.0) (CL) SILTY CLAY, low plasticity fines, trace fine sand; medium dark gray (N4); cohesive, w<PL, firm CL (25.0-32.0) (SP & CL) SAND and SILTY CLAY, fine sand, medium to low plasticity fines; light brownish gray (5YR 6/1) (sand size particles) and medium dark gray (N4) (fines); cohesive, w<PL, firm - 25 SP 4.0 10.0 SO & CL 6 RECORD OF Log continued on next page SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

10/9/17

BOREHOLE MWD

RECORD OF BOREHOLE MW-B1 SHEET 2 of 4 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/25/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 409.55 AZIMUTH: N/A INCLINATION: -90 COORDINATES: N: 837,602.13 E: 887,903.93 LOCATION: Rush Island Energy Center SAMPLES **BORING METHOD** SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS NUMBER TYPE DESCRIPTION USCS DEPTH (ft) - 30 (25.0-32.0) (SP & CL) SAND and SILTY CLAY, fine sand, medium to low plasticity fines; light brownish gray (SYR 6/1) (sand size particles) and medium dark gray (N4) (fines); cohesive, w<PL, firm (Continued) SP & CL (32.0-35.0) (SM) SILTY SAND, fine sand, non-plastic fines; light brownish gray (5YR 6/1); non-cohesive, dry, 4.0 10.0 6 SO compact SM - 35 (35.0-40.0) (CL) sandy SILTY CLAY, low to medium plasticity fines, fine sand; light brownish gray (5YR 6/1); cohesive, w~PL, firm CL 7.0 10.0 40 7 SO (40.0-55.0) (SP) SAND, fine to medium sub-rounded sand, trace low plasticity fines; yellowish gray (5Y 7/2); non-cohesive, dry, compact Sonic 364.6 - 45 $\begin{array}{ll} \hbox{(45.0) Driller notes native groundwater likely} \\ \hbox{encountered.} & \underline{\nabla} & Water Level & 45.63 \\ \hline \text{ft bgs } 11/6/15 \\ \end{array}$ (45.0) SAA except, moderate yellowish brown (10YR 5/4); moist SP 10/9/17 - 50 8 SO RIEC LOGS.GPJ GLDR_CO.GDT - 55 (55.0-100.0) (SW) SAND, fine to coarse, sub-rounded sand, trace fine to coarse sub-rounded gravel, trace non-plastic fines; medium dark gray (N4) to moderate yellowish brown (10YR 5/4); non-cohesive, wet, compact BOREHOLE MWD 4.0 10.0 SW SO 9 RECORD OF Log continued on next page GOLDER STL SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-B1 SHEET 3 of 4 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/25/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 409.55 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 837,602.13 E: 887,903.93 SAMPLES SOIL/ROCK PROFILE **BORING METHOD** DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS REC ATT DESCRIPTION NUMBER TYPE USCS DEPTH - 60 (55.0-100.0) (SW) SAND, fine to coarse, sub-rounded sand, trace fine to coarse sub-rounded gravel, trace non-plastic fines; medium dark gray (N4) to moderate yellowish brown (10YR 5/4); non-cohesive, wet, compact (Continued) <u>4.0</u> 10.0 9 SO 346.6 (63.0) SAA except. thin layer (~2 inches) of black (N1) organics 63.0 - 65 - 70 10 SO 336.6 73.0 (73.0) SAA except, trace black (N1) organics Sonic 334.6 - 75 SW Run #11, issues with recovery, driller notes that material is very soft any is likely being pushed out of the way instead of into the sampler. (75.0) SAA except, no fines, light olive gray (5Y 5/2) <u>0.5</u> 5.0 11 SO - 80 Run #12, still issues with recovery, driller trys to switch drill bit to help improve recovery. 5.0 10.0 - 85 12 SO

SCALE: 1 in = 3.8 ft

DRILLER: J. Drabek

RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17

GOLDER STL RECORD OF BOREHOLE MWD

DRILLING CONTRACTOR: Cascade

Log continued on next page

LOGGED: JSI/JS CHECKED: JSI

319.6

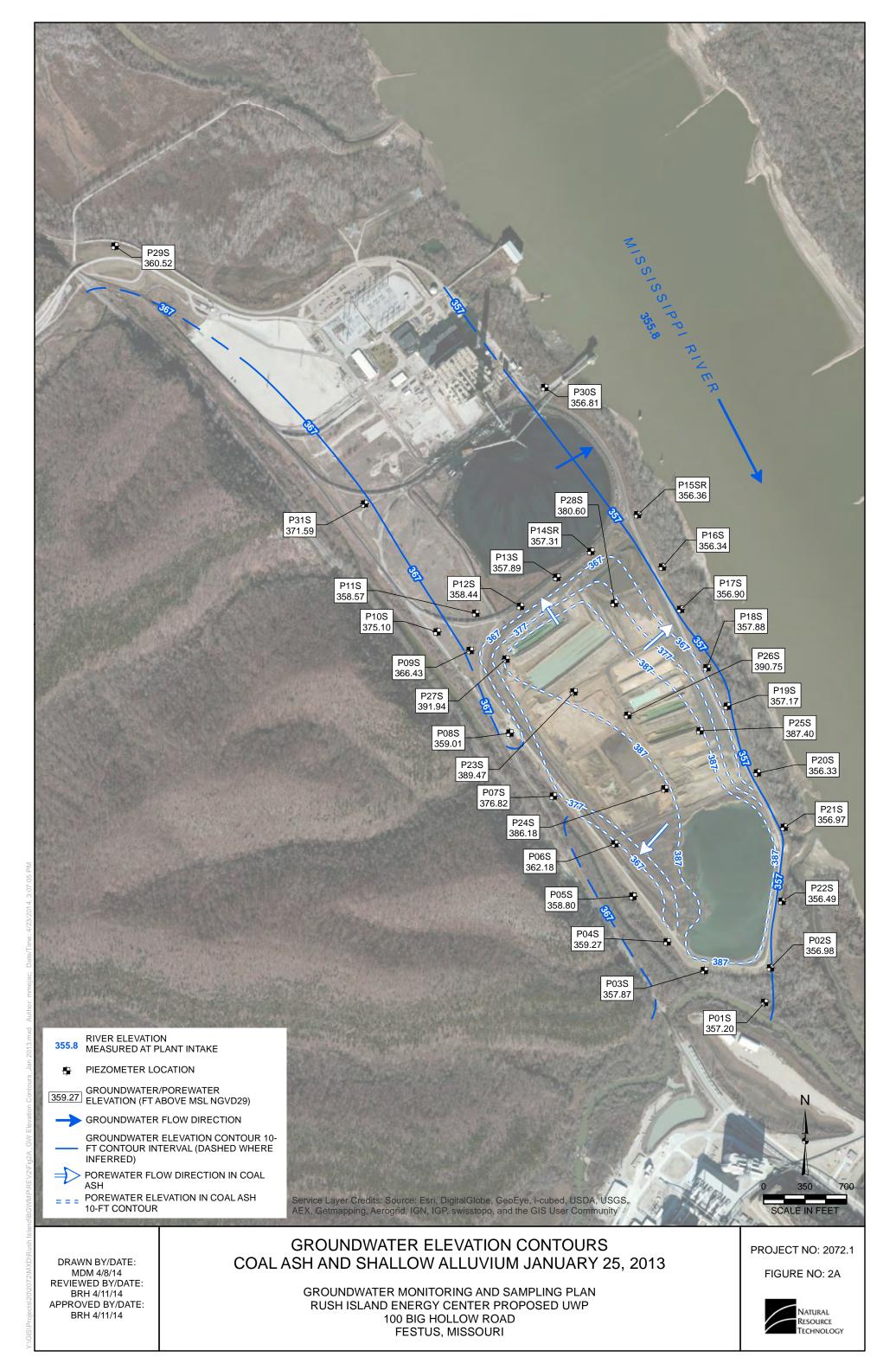
Golder REVIEWED: PJJ/MNH Associates

RECORD OF BOREHOLE MW-B1 SHEET 4 of 4 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/25/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 409.55 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 837,602.13 E: 887,903.93 SAMPLES SOIL/ROCK PROFILE **BORING METHOD** DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS DESCRIPTION NUMBER TYPE USCS DEPTH (ft) (55.0-100.0) (SW) SAND, fine to coarse, sub-rounded sand, trace fine to coarse sub-rounded gravel, trace non-plastic fines; medium dark gray (N4) to moderate yellowish brown (10YR 5/4); non-cohesive, wet, compact (Continued)
(90.0) SAA except, trace 1 inch layers of CLAYEY SAND (SC) with medium plasticity - 90 90.0 Sonic <u>5.0</u> 10.0 - 95 SW 13 SO 100 BORING TERMINATED AT 100.0 FT BELOW GROUND SURFACE.
FOR WELL DETAILS, SEE WELL
CONSTRUCTION LOG MW-B1. - 105 GOLDER STL RECORD OF BOREHOLE MWD RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 - 110 - 115 LOGGED: JSI/JS SCALE: 1 in = 3.8 ft DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates

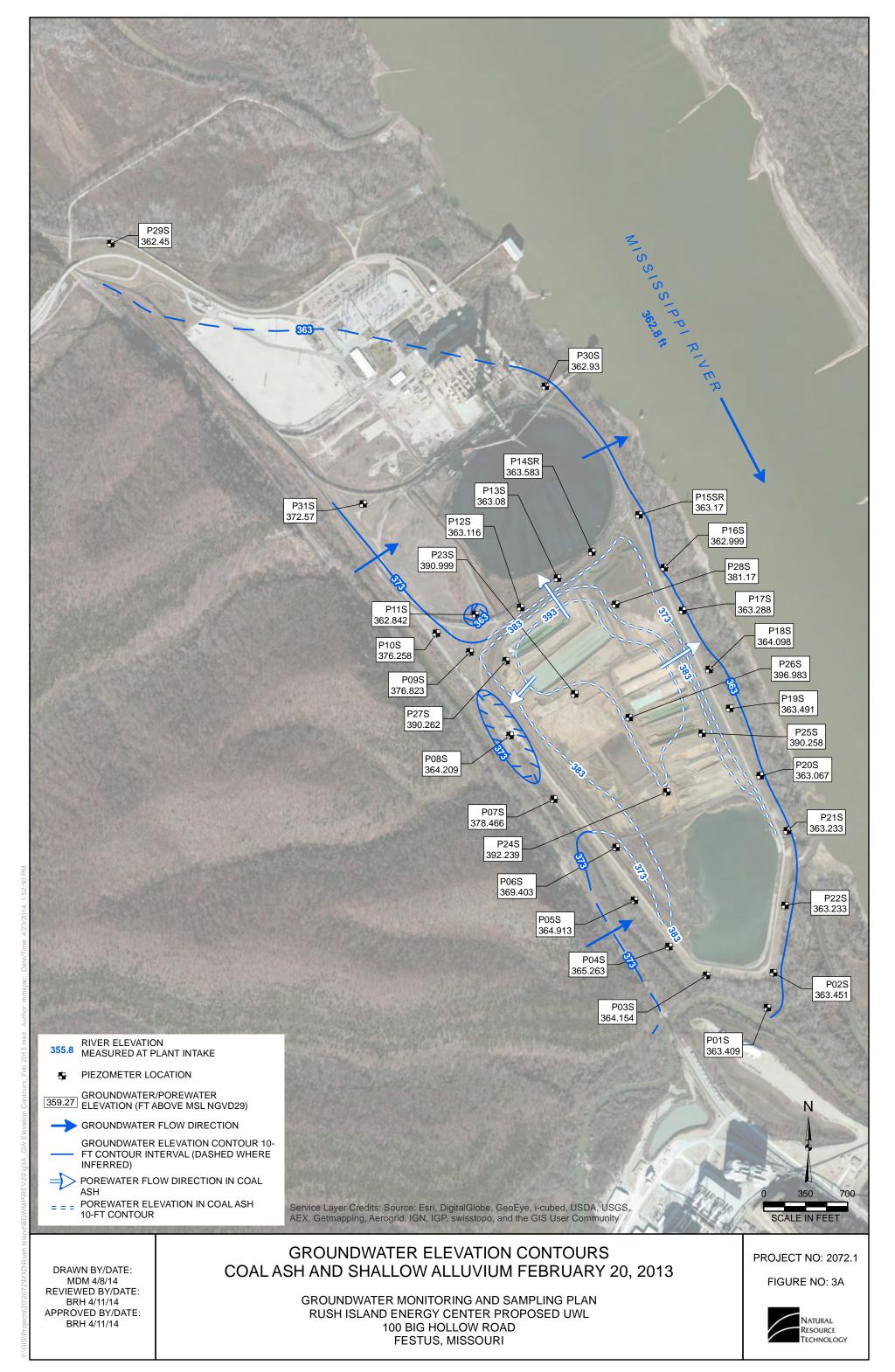
RECORD OF BOREHOLE MW-B2 SHEET 1 of 3 PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DRILLING METHOD: 6" Sonic DATUM: NAVD88 ELEVATION: 395.94 DRILLING DATE: 10/27/2015 DRILL RIG: Mini Sonic (CDD 1415) AZIMUTH: N/A INCLINATION: -90 COORDINATES: N: 837,801.74 E: 885,337.20 LOCATION: Rush Island Energy Center SAMPLES BORING METHOD SOIL/ROCK PROFILE DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS REC ATT NUMBER TYPE DESCRIPTION USCS DEPTH (ft) - 0 395.8 (0.0-0.1) TOPSOIL - (ML) SILT, non-plastic fines, trace ML 0.1 fine sand, trace organics (roots); medium dark gray (N4); non-cohesive, moist, very loose 1.5 2.5 (0.1-3.5) (SP) SAND, fine to medium sand, trace non-plastic fines; moderate yellowish brown (10YR 5/4); 1 SO SP non-cohesive, dry, loose (3.5-8.8) (SP) SAND, fine to medium sand, trace 2 SO non-plastic fines; medium dark gray (N4); non-cohesive, moist, loose 390.9 - 5 (5.0) SAA (Same As Above) except, trace fine to coarse 5.0 sub-rounded gravel (chert) SP SO 387.1 8.8 (8.8-10.0) (CL-ML) SILTY CLAY to SILT, low plasticity fines, trace fine sand; medium dark gray (N4); cohesive, CL-ML 10 (10.0-12.5) (SC) CLAYEY SAND, fine to medium sand, low plasticity fines; medium dark gray (N4); non-cohesive, dry, loose SC 383.4 12.5 2.8 5.0 SO (12.5-20.0) (SM) SILTY SAND, fine sand, non-plastic fines; light brownish gray (5YR 6/1); non-cohesive, dry, 4 Sonic - 15 6 SM 378 4 3.7 5.0 5 SO (17.5) SAA except, some medium plasticity fines seams (>1.0 inches thick) 10/9/17 20 (20.0-24.0) (CL) SILTY CLAY, medium plasticity fines, (20.0) Driller notes native water some fine sand; brownish gray (5YR 4/1) to medium dark gray (N4); cohesive, w~PL, soft CO.GDT CL RIEC LOGS.GPJ GLDR 6 SO (24.0-30.0) (SP-SM) SAND, fine sand, some non-plastic fines; brownish gray (5YR 4/1); non-cohesive, moist, compact - 25 BOREHOLE MWD SP-SM 5.0 5.0 SO 7 RECORD OF 365.9 Log continued on next page GOLDER STL SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH **Associates**

RECORD OF BOREHOLE MW-B2 SHEET 2 of 3 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/27/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 395.94 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 837,801.74 E: 885,337.20 SAMPLES SOIL/ROCK PROFILE **BORING METHOD** DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS NUMBER DESCRIPTION TYPE USCS DEPTH (ft) - 30 (30.0-40) (SP) SAND, fine sand, trace non-plastic fines; light olive gray (5Y 5/2); non-cohesive, wet, compact 30.0 (30.0) Run #8, Driller notes silty/sandy clay may have clogged bit for run. sand was not able to push up the clay causing poor recovery. when pushing in the casing the driller noted that the material acted like a sand. <u>2.0</u> 10.0 - 35 SP 8 SO 40 (40.0-41.0) (SW) SAND, fine to coarse, subrounded sand; dark gray (N3); non-cohesive, wet, compact SW (41.0-43.0) (CL) SILTY CLAY, medium plasticity fines, some fine sand; medium dark gray (N4); cohesive, w~PL. firm CL (43.0-54.5) (SP) SAND, fine to medium sub-rounded sand; medium dark gray (N4); non-cohesive, moist, compact Sonic - 45 9 SO 6 SP RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 - 50 342.9 (53.0) ~1 inch seam of black (N1) organic material. (54.5-60.0) (CL) SILTY CLAY, medium to high plasticity fines, trace fine sand; medium dark gray (N4); cohesive, - 55 10 SO RECORD OF BOREHOLE MWD CL 335.9 Log continued on next page GOLDER STL SCALE: 1 in = 3.8 ft LOGGED: JSI/JS DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH **Associates**

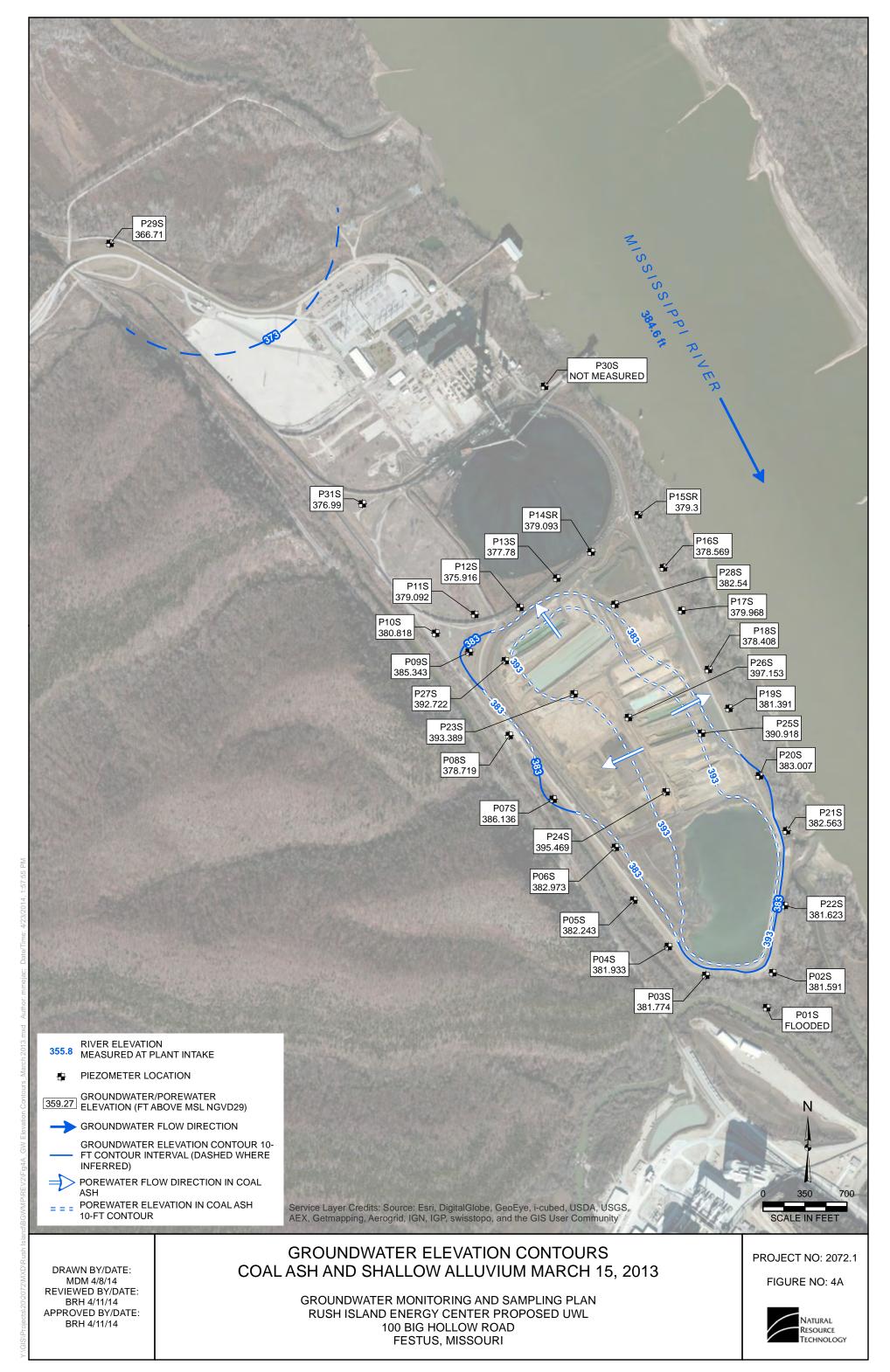
RECORD OF BOREHOLE MW-B2 SHEET 3 of 3 DRILLING METHOD: 6" Sonic DRILLING DATE: 10/27/2015 DRILL RIG: Mini Sonic (CDD 1415) PROJECT: Ameren CCR GW Monitoring PROJECT NUMBER: 153-1406.0002A DATUM: NAVD88 ELEVATION: 395.94 AZIMUTH: N/A INCLINATION: -90 LOCATION: Rush Island Energy Center COORDINATES: N: 837,801.74 E: 885,337.20 SAMPLES SOIL/ROCK PROFILE **BORING METHOD** DEPTH (feet) GRAPHIC LOG ELEVATION REMARKS REC ATT DESCRIPTION NUMBER TYPE USCS DEPTH (ft) - 60 60.0 (60.0-65.0) (SP) SAND, fine to medium sub-rounded sand, trace non-plastic fines; medium dark gray (N4); SP <u>8.0</u> 10.0 - 65 11 SO (65.0-87.9) (SP) SAND, fine to coarse sub-rounded sand, trace non-plastic, fines; medium dark gray (N4); non-cohesive, wet, compact - 70 (70.0) Run #11, poor recovery on the first sample run, most of sample fell out. Driller re-deploys sampler and collects remaining sample. Driller notes sample is likely mixed up after multiple attempts. 6" Sonic 7.0 10.0 - 75 12 SO SP GOLDER STL RECORD OF BOREHOLE MWD RIEC LOGS.GPJ GLDR_CO.GDT 10/9/17 315.9 - 80 (80.0) SAA, trace fine to medium sub-rounded gravel 80.0 13 SO - 85 308.0 87.9 BORING TERMINATED AT 87.9 FT BELOW GROUND SURFACE.
FOR WELL DETAILS, SEE WELL CONSTRUCTION LOG MW-B2. LOGGED: JSI/JS SCALE: 1 in = 3.8 ft DRILLING CONTRACTOR: Cascade CHECKED: JSI Golder DRILLER: J. Drabek REVIEWED: PJJ/MNH Associates APPENDIX B
Historic NRT Potentiometric Surface Maps and
Cross-Sections with Potentiometric Contours



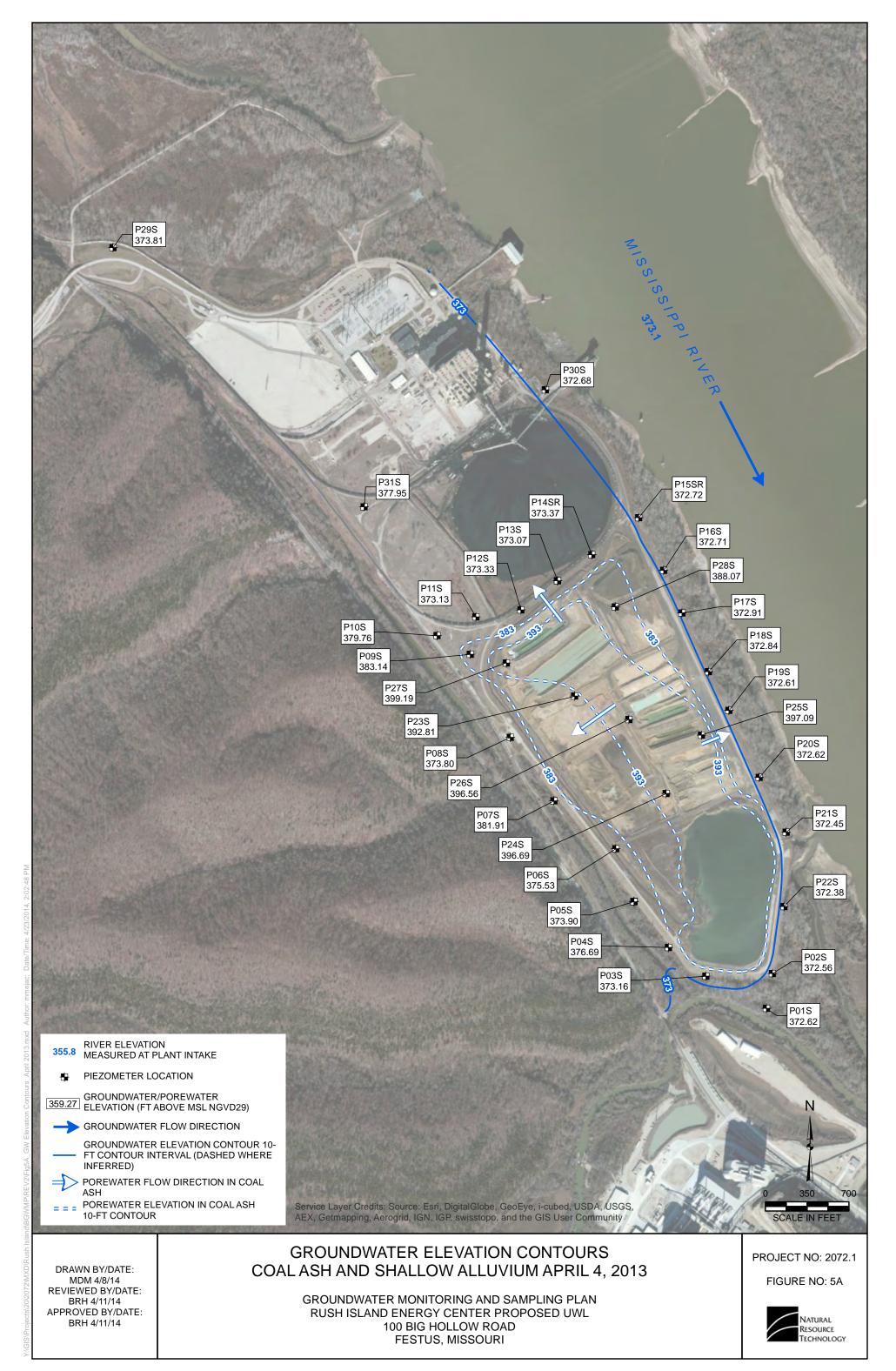


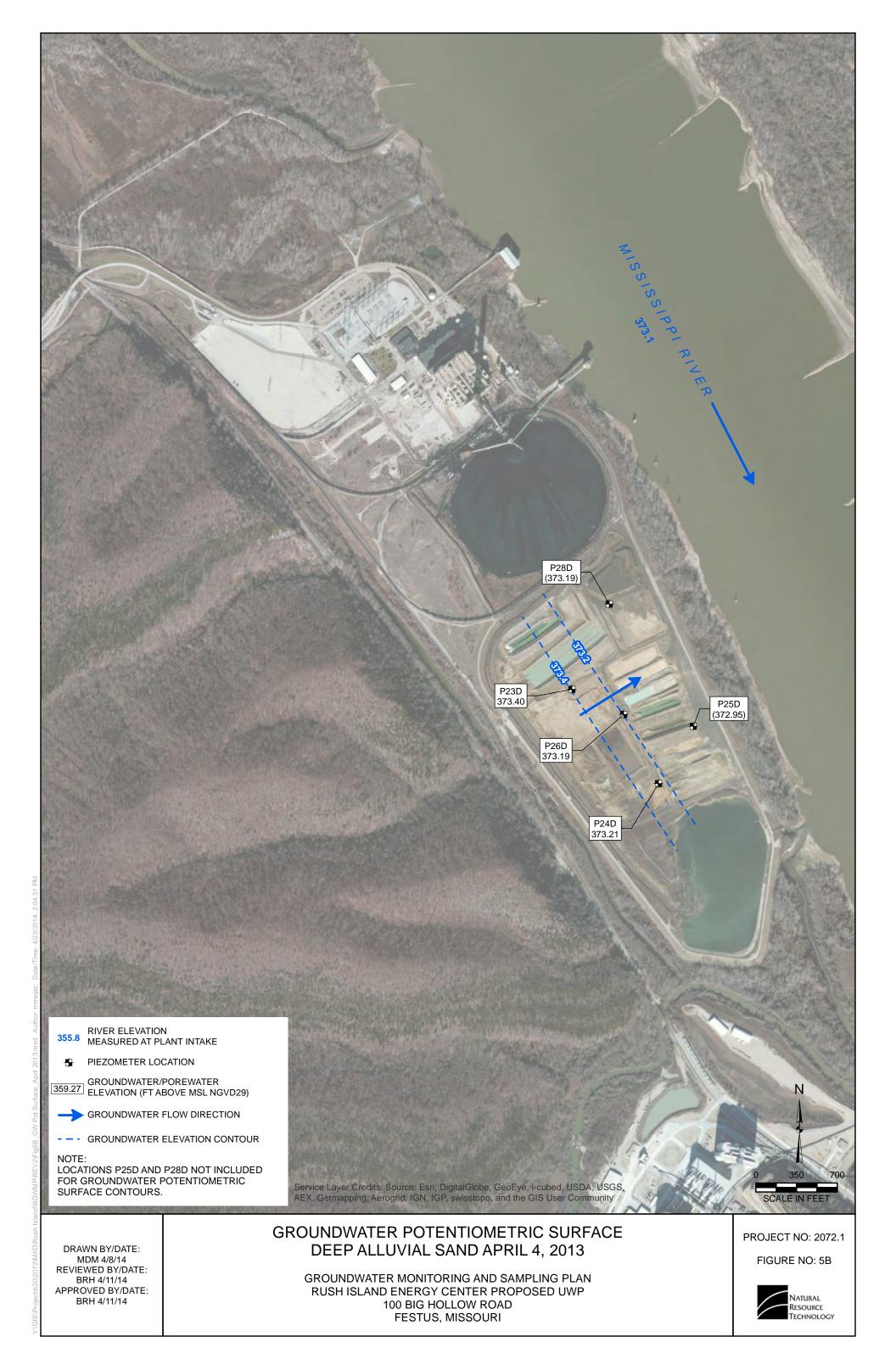


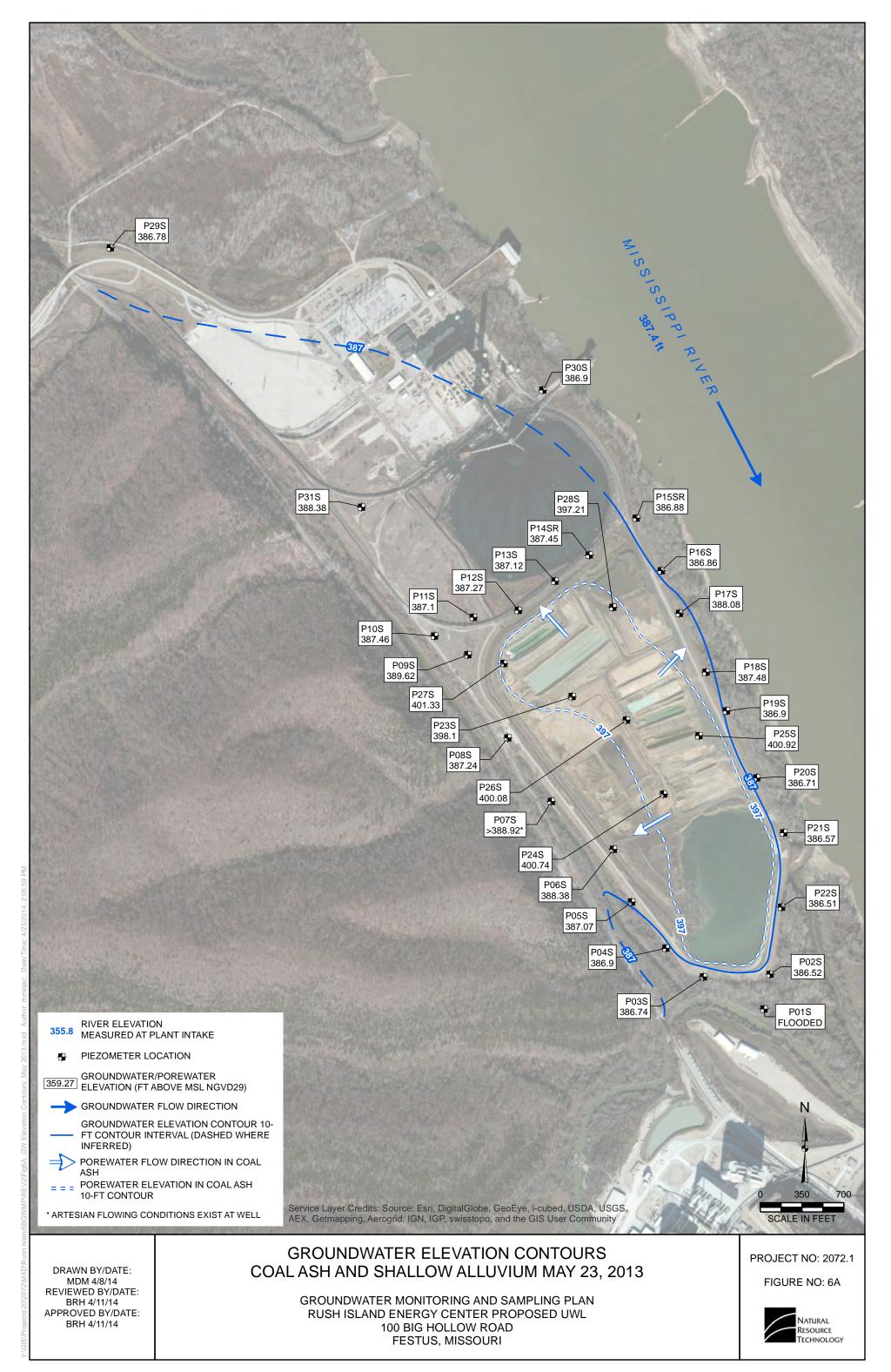


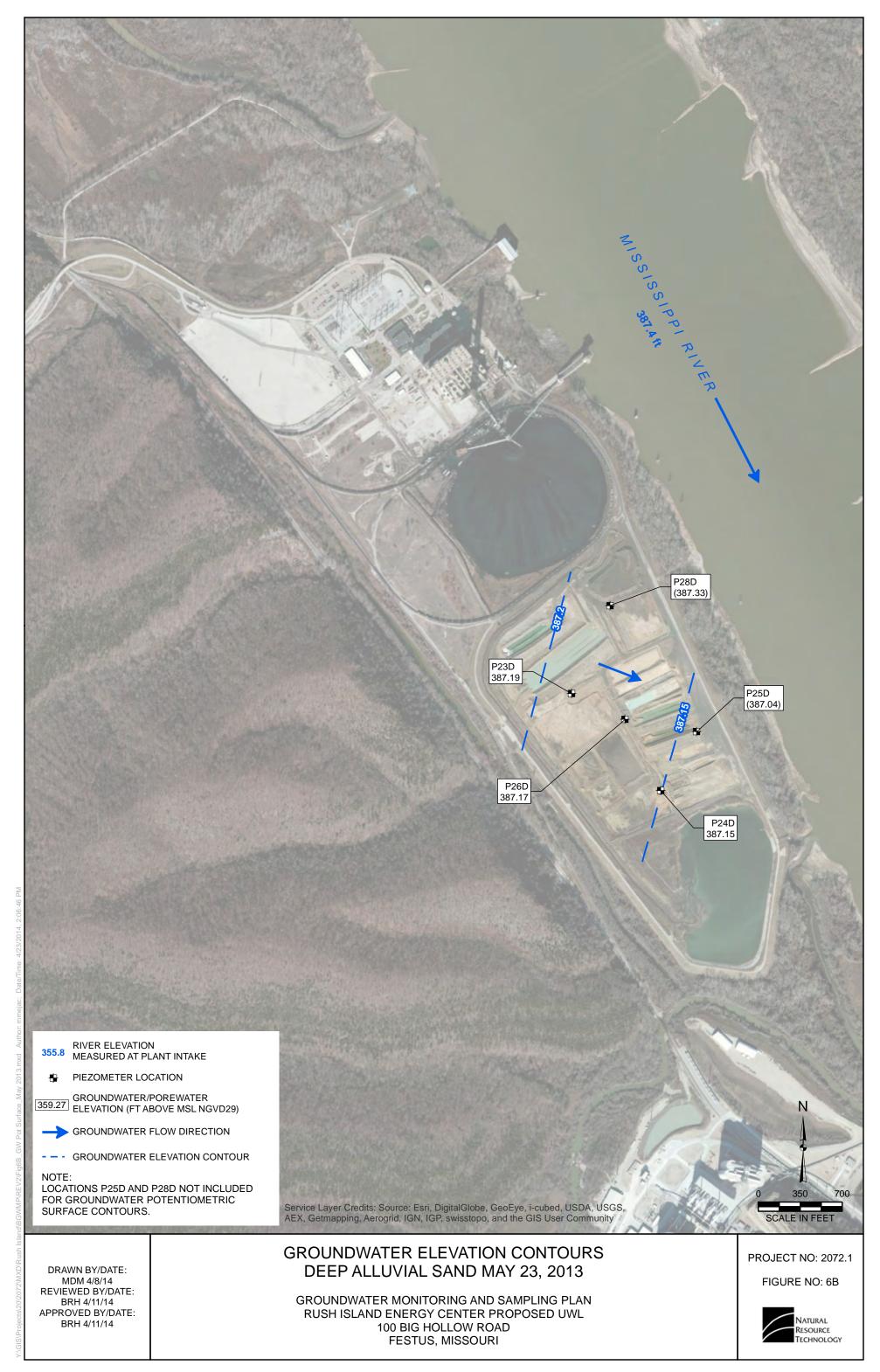


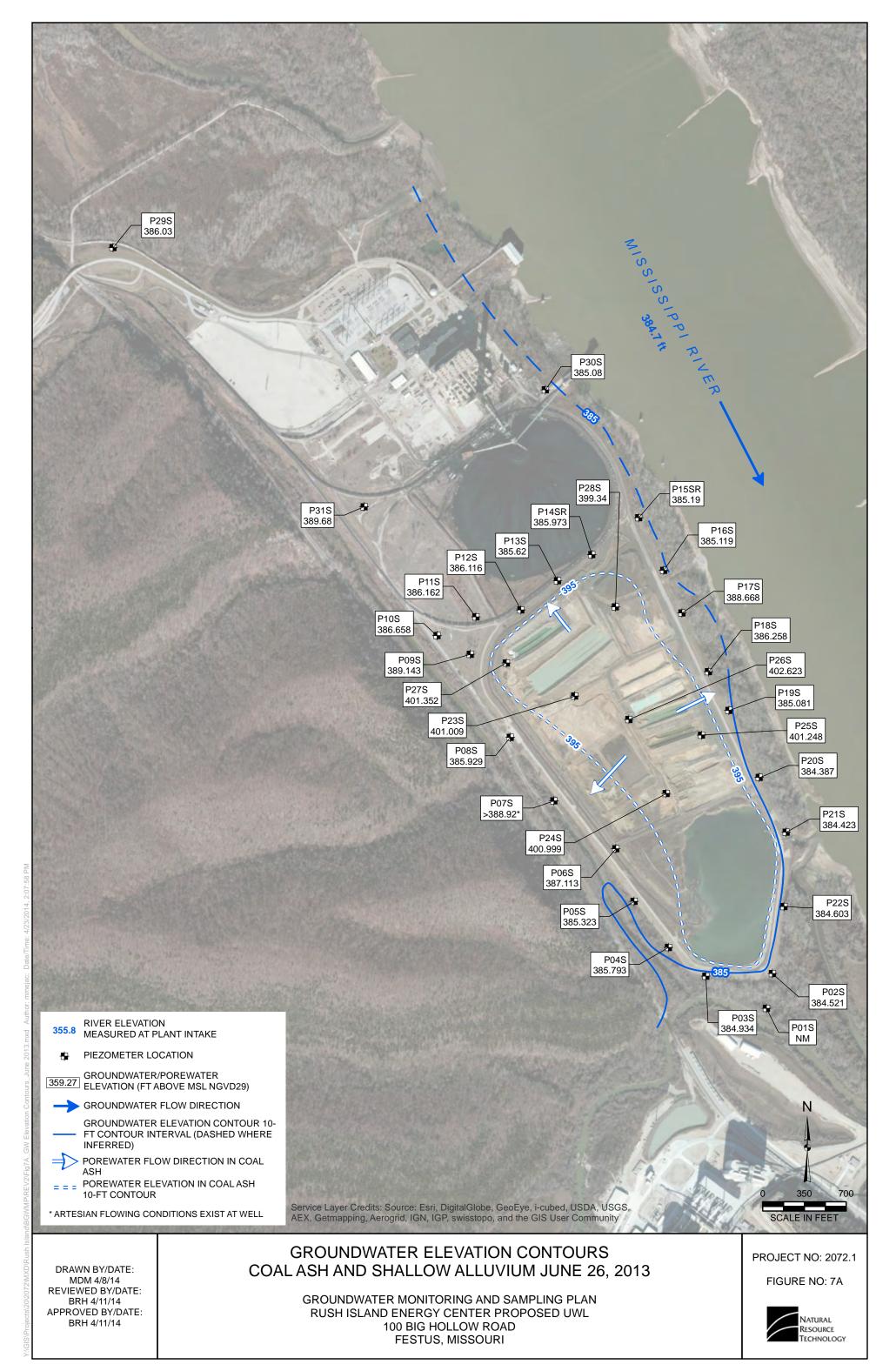


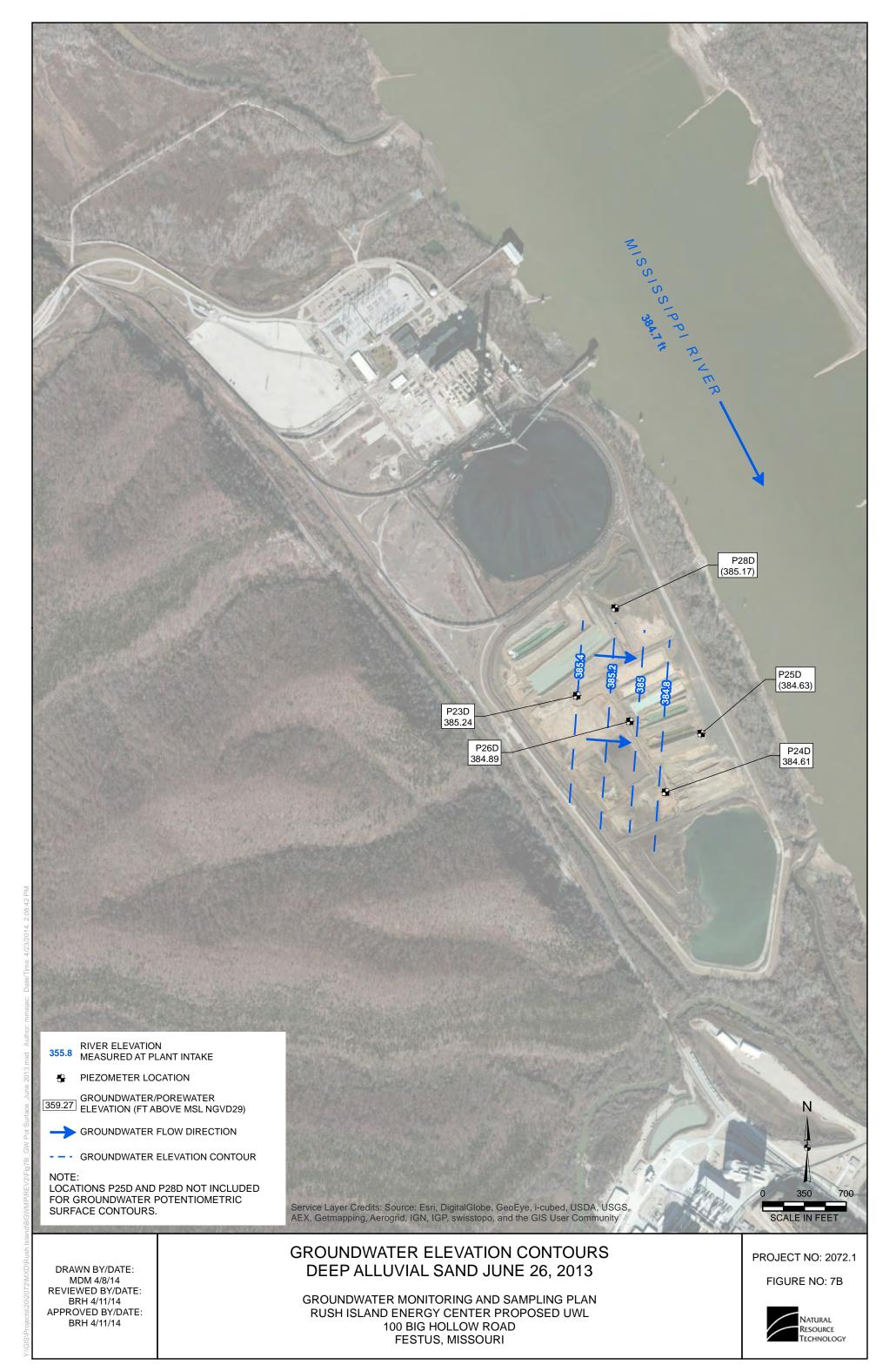


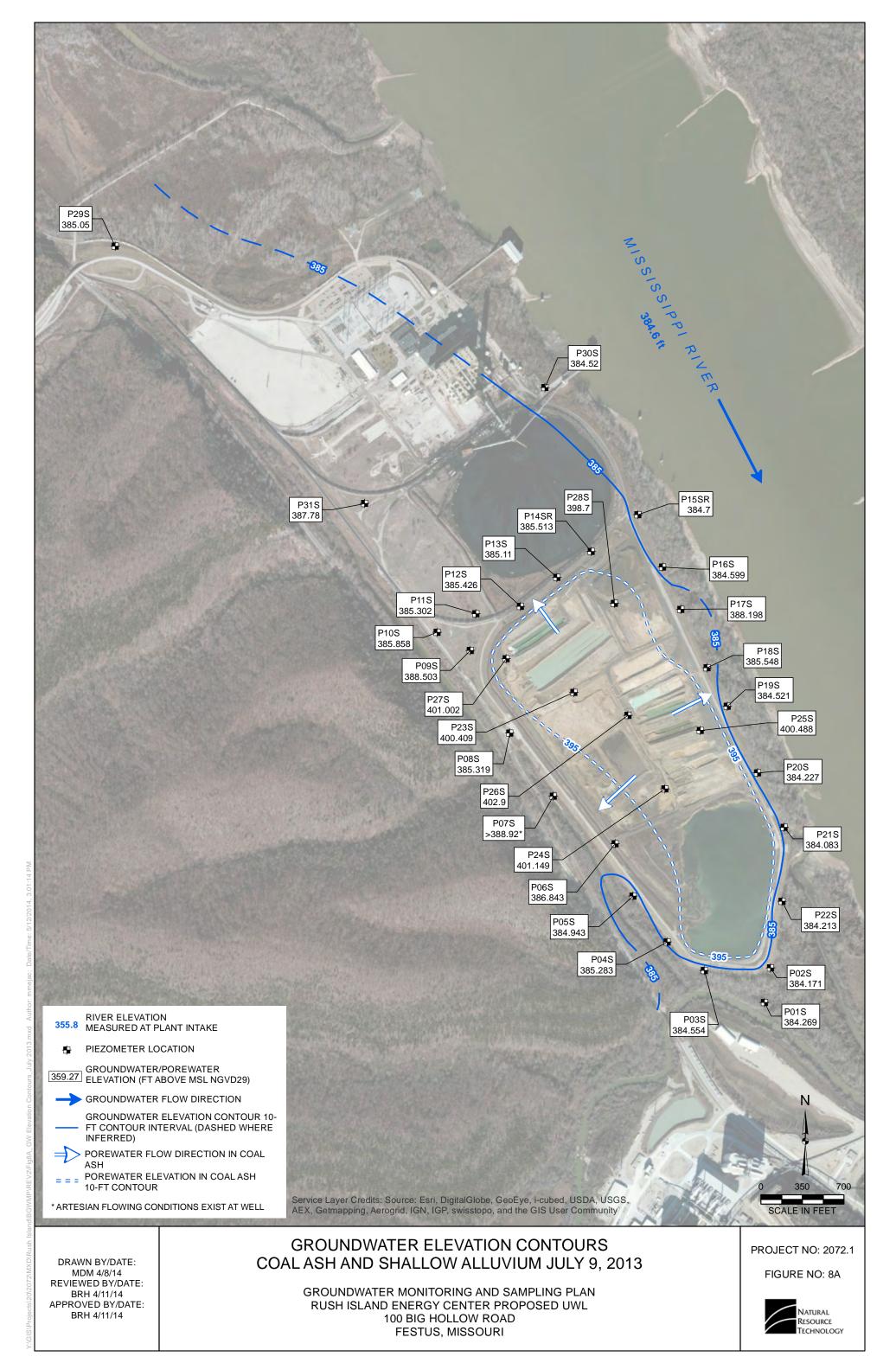


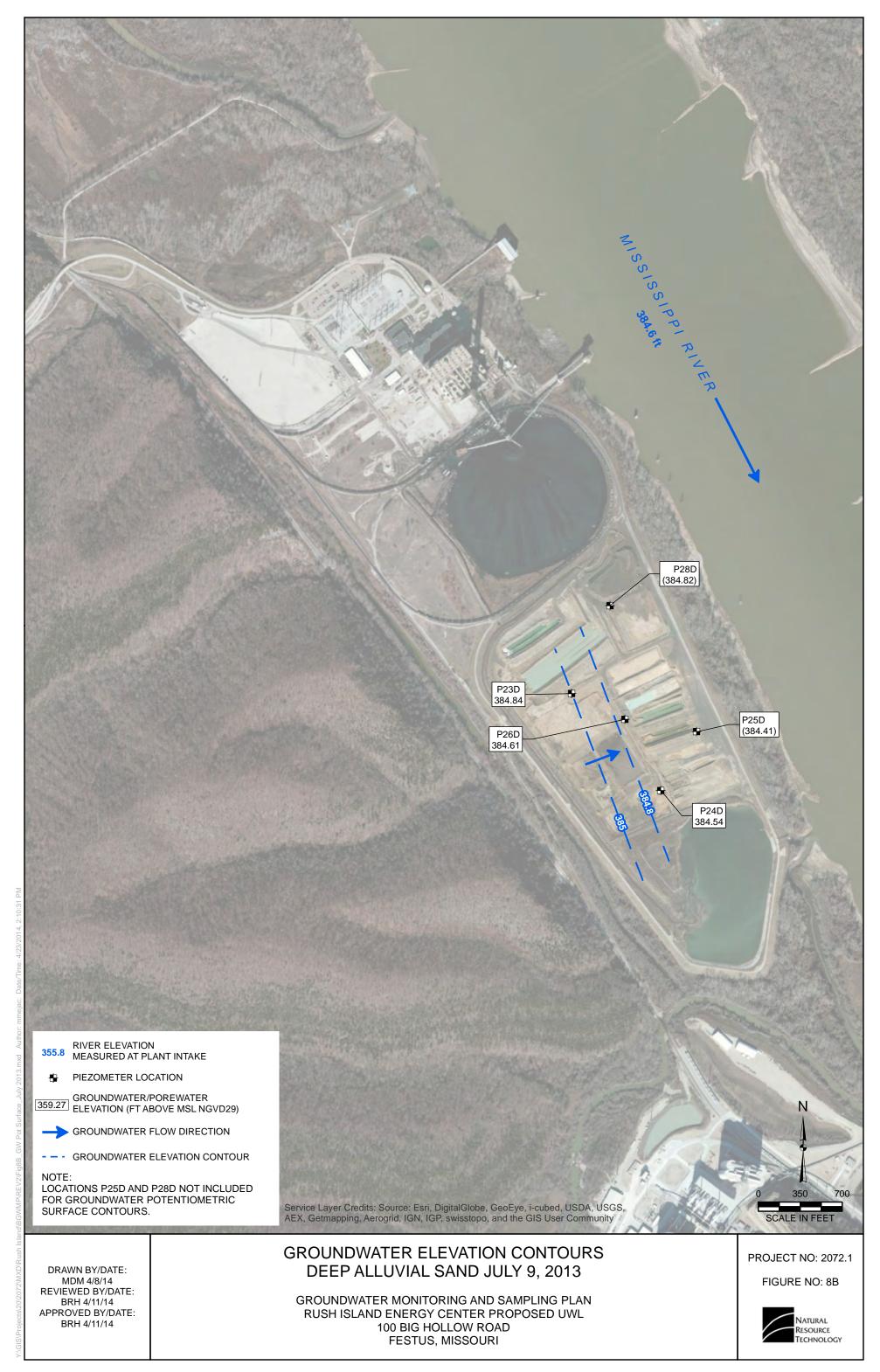


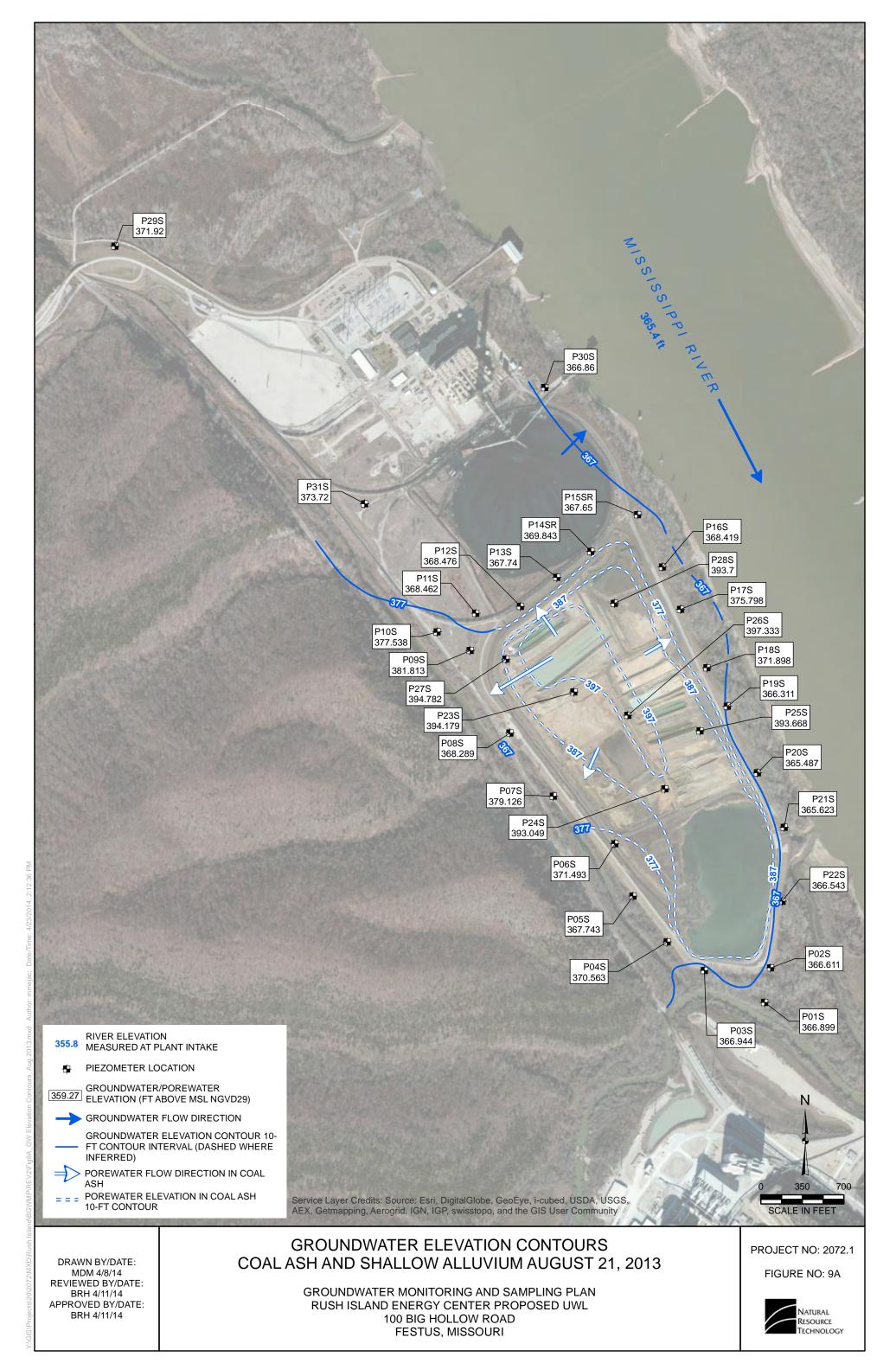


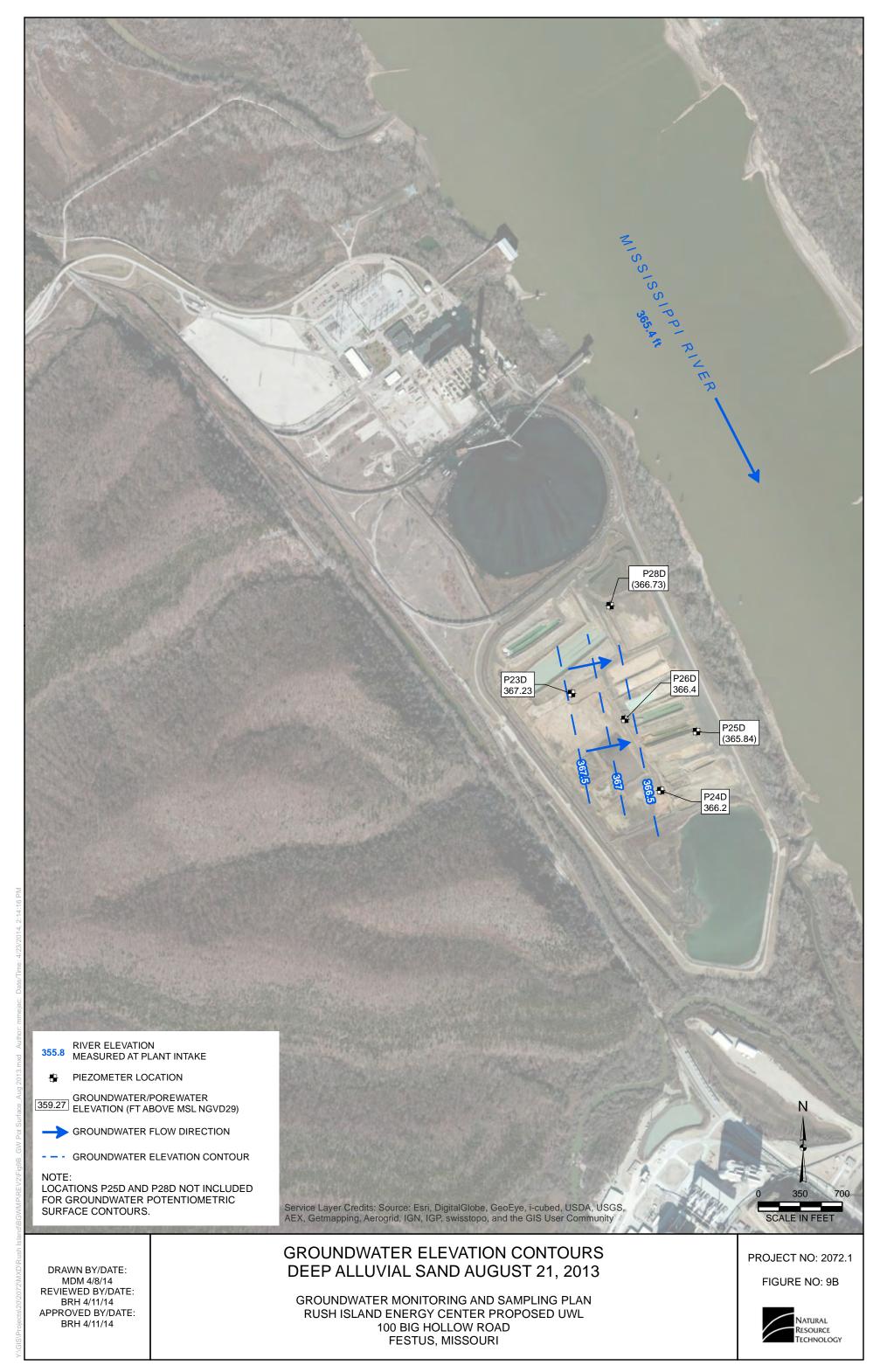


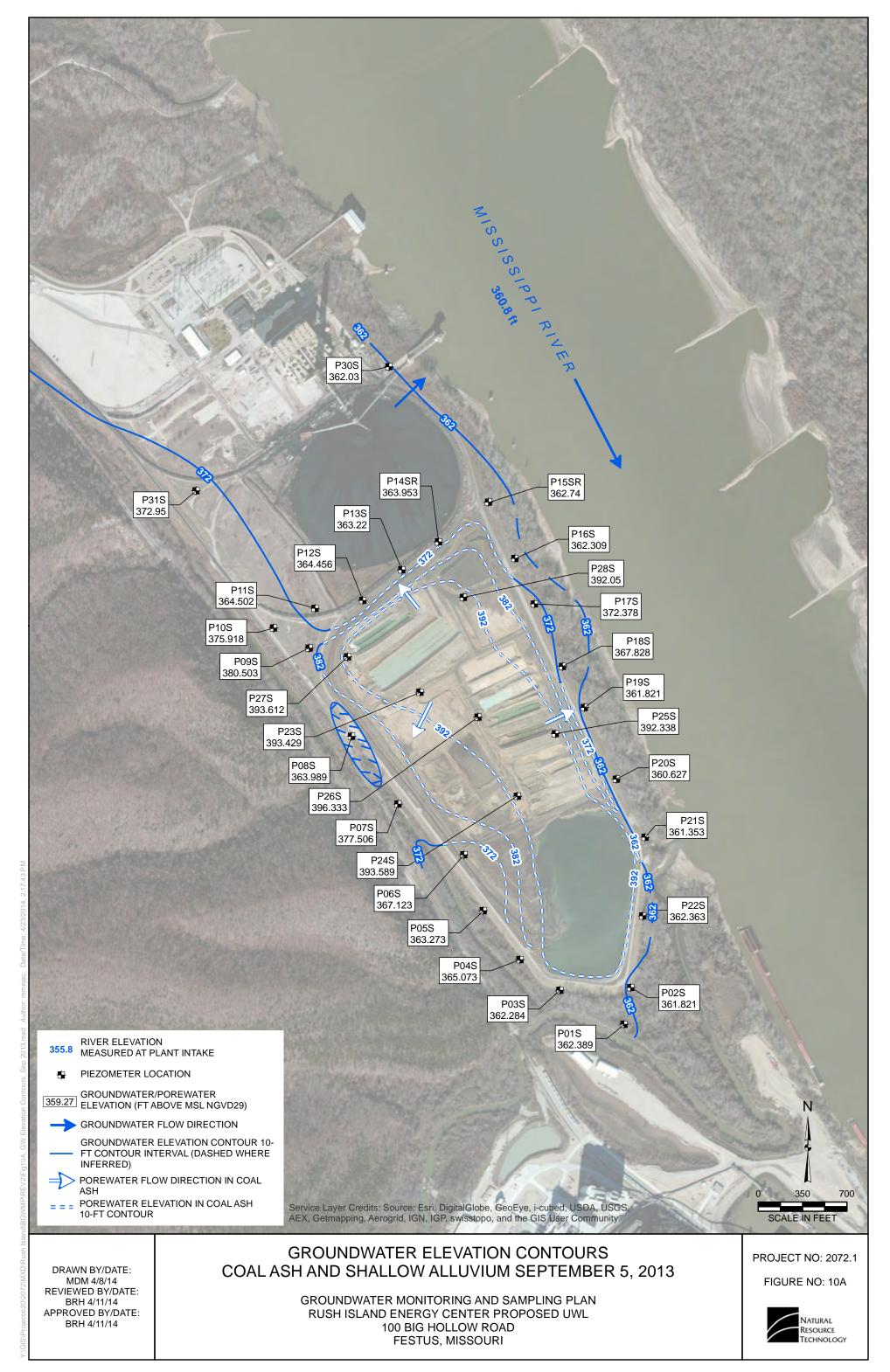




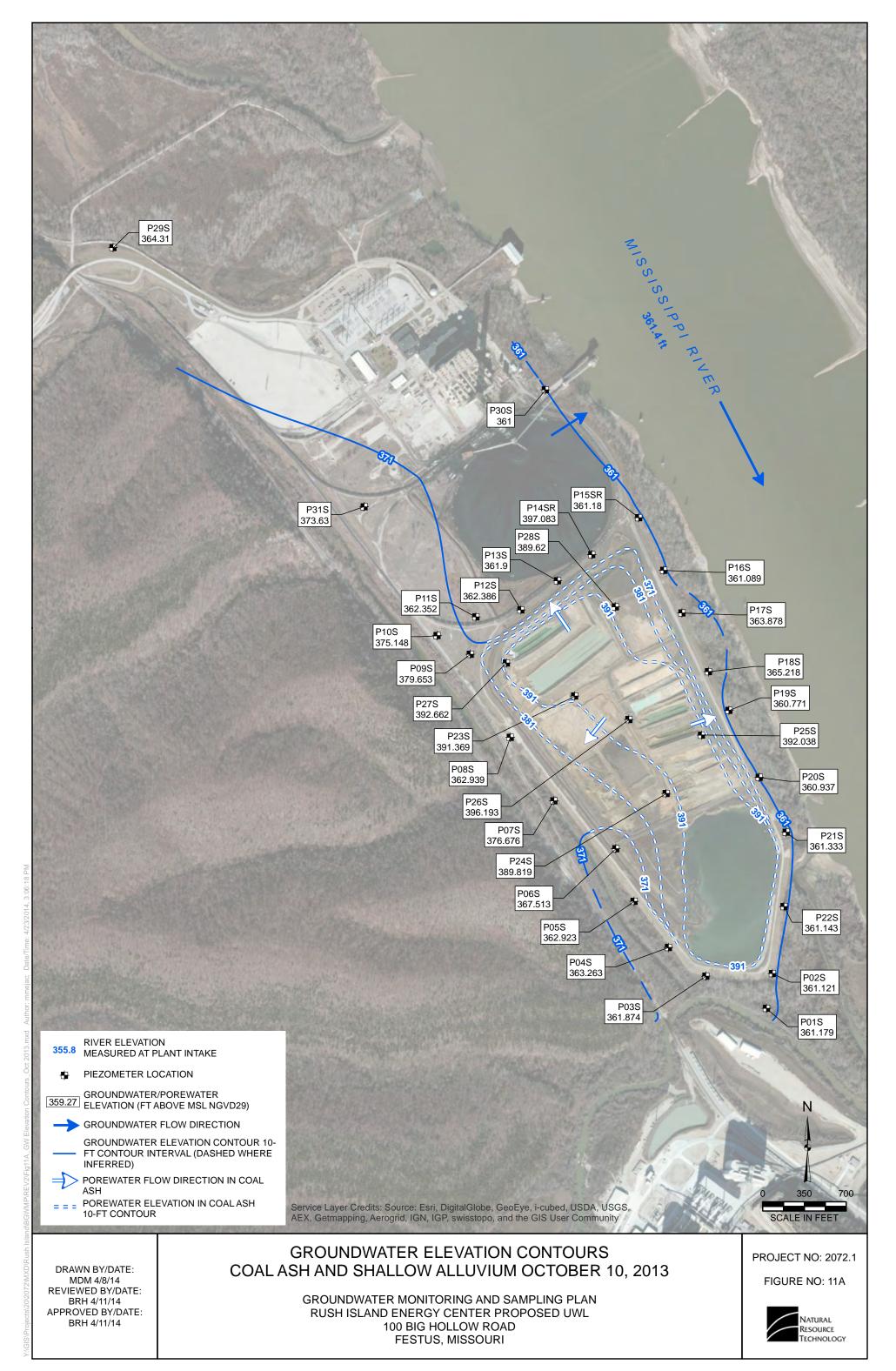




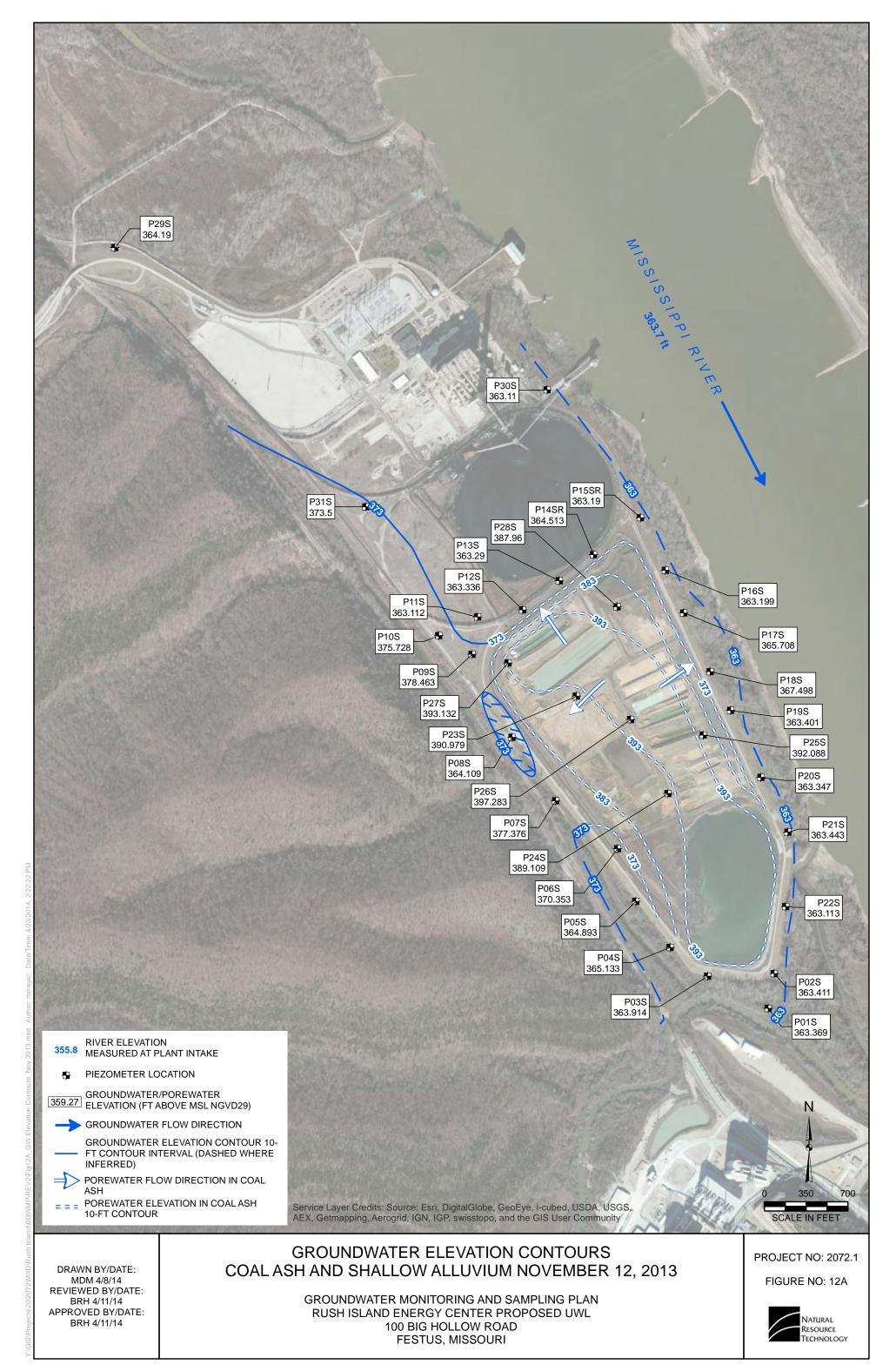






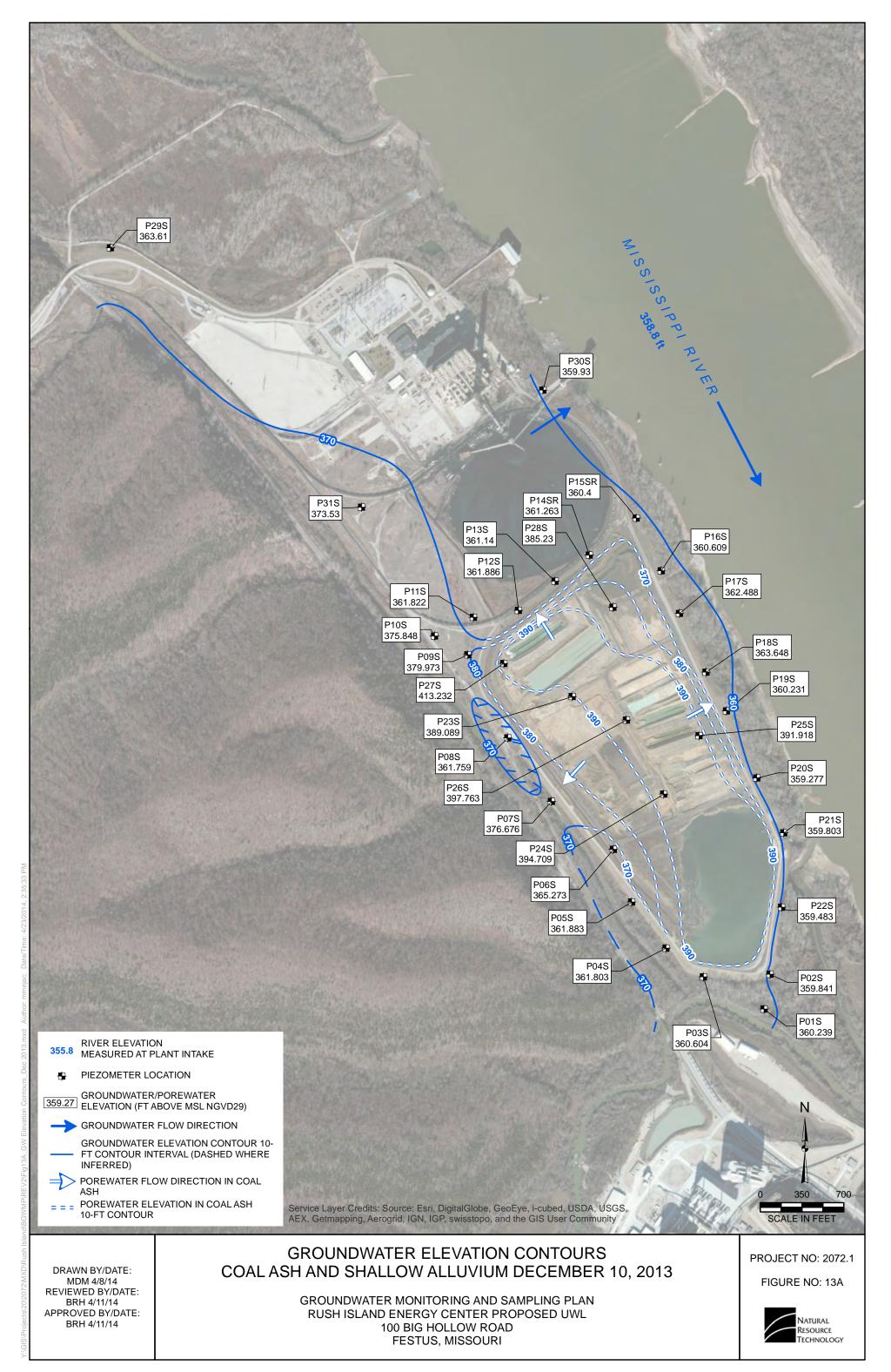


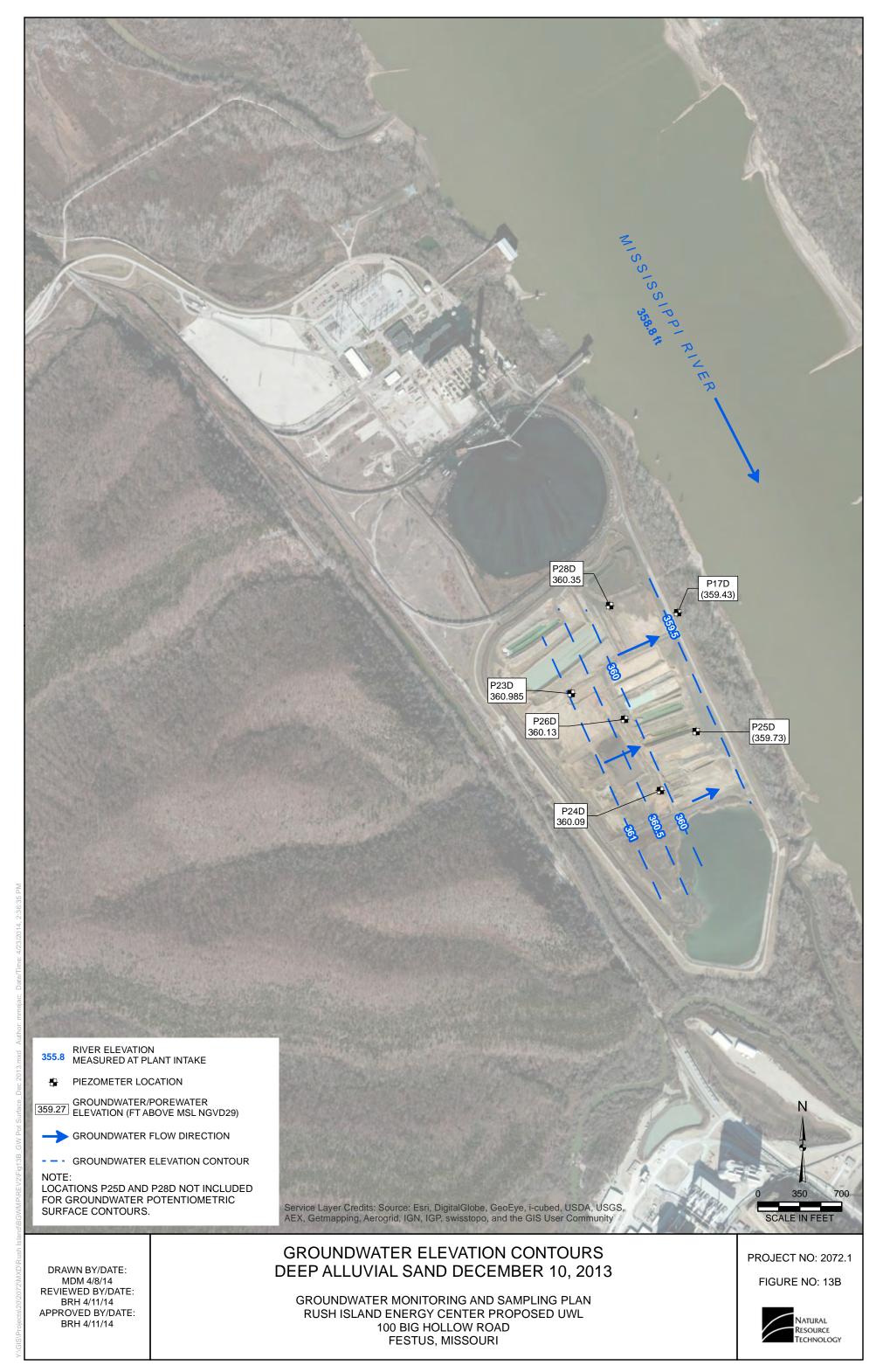




AMEREN_00000270







SHALLOW ALLUVIAL AQUIFER GROUNDWATER / POREWATER ELEVATION CONTOUR MAP MARCH 25, 2014

DETAILED SITE INVESTIGATION RUSH ISLAND ENERGY CENTER 100 BIG HOLLOW ROAD FESTUS, MISSOURI PROJECT NO: 2072.1/10.3 FIGURE NO: PS - 3/14



SHALLOW ALLUVIAL AQUIFER - GROUNDWATER / POREWATER ELEVATION CONTOUR MAP JUNE 15, 2014

DETAILED SITE INVESTIGATION RUSH ISLAND ENERGY CENTER 100 BIG HOLLOW ROAD FESTUS, MISSOURI PROJECT NO: 2072.1/10.3 FIGURE NO: PS - 6/14



SHALLOW ALLUVIAL AQUIFER GROUNDWATER / POREWATER ELEVATION CONTOUR MAP SEPTEMBER 16, 2014

DETAILED SITE INVESTIGATION RUSH ISLAND ENERGY CENTER 100 BIG HOLLOW ROAD FESTUS, MISSOURI PROJECT NO: 2072.1/10.3 FIGURE NO: PS - 9/14



SHALLOW ALLUVIAL AQUIFER GROUNDWATER / POREWATER ELEVATION CONTOUR MAP DECEMBER 11, 2014

DETAILED SITE INVESTIGATION RUSH ISLAND ENERGY CENTER 100 BIG HOLLOW ROAD FESTUS, MISSOURI PROJECT NO: 2072.1/10.3 FIGURE NO: PS - 12/14





DEEP ALLUVIAL AQUIFER POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP MARCH 25, 2014

DETAILED SITE INVESTIGATION RUSH ISLAND ENERGY CENTER 100 BIG HOLLOW ROAD FESTUS, MISSOURI PROJECT NO: 2072.1/10.3 FIGURE NO: PD - 3/14





DEEP ALLUVIAL AQUIFER POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP JUNE 13, 2014

DETAILED SITE INVESTIGATION RUSH ISLAND ENERGY CENTER 100 BIG HOLLOW ROAD FESTUS, MISSOURI PROJECT NO: 2072.1/10.3 FIGURE NO: PD - 6/14





DEEP ALLUVIAL AQUIFER POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP SEPTEMBER 16, 2014

DETAILED SITE INVESTIGATION RUSH ISLAND ENERGY CENTER 100 BIG HOLLOW ROAD FESTUS, MISSOURI PROJECT NO: 2072.1/10.3 FIGURE NO: PD - 9/14





DEEP ALLUVIAL AQUIFER POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP DECEMBER 11, 2014

DETAILED SITE INVESTIGATION RUSH ISLAND ENERGY CENTER 100 BIG HOLLOW ROAD FESTUS, MISSOURI PROJECT NO: 2072.1/10.3 FIGURE NO: PD - 12/14



SHALLOW BEDROCK PIEZOMETERS POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP JUNE 13, 2014

DETAILED SITE INVESTIGATION RUSH ISLAND ENERGY CENTER 100 BIG HOLLOW ROAD FESTUS, MISSOURI PROJECT NO: 2072.1/10.3

FIGURE NO: PBR - 6/14





SHALLOW BEDROCK PIEZOMETERS POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP SEPTEMBER 16, 2014

DETAILED SITE INVESTIGATION RUSH ISLAND ENERGY CENTER 100 BIG HOLLOW ROAD FESTUS, MISSOURI PROJECT NO: 2072.1/10.3

FIGURE NO: PBR - 9/14



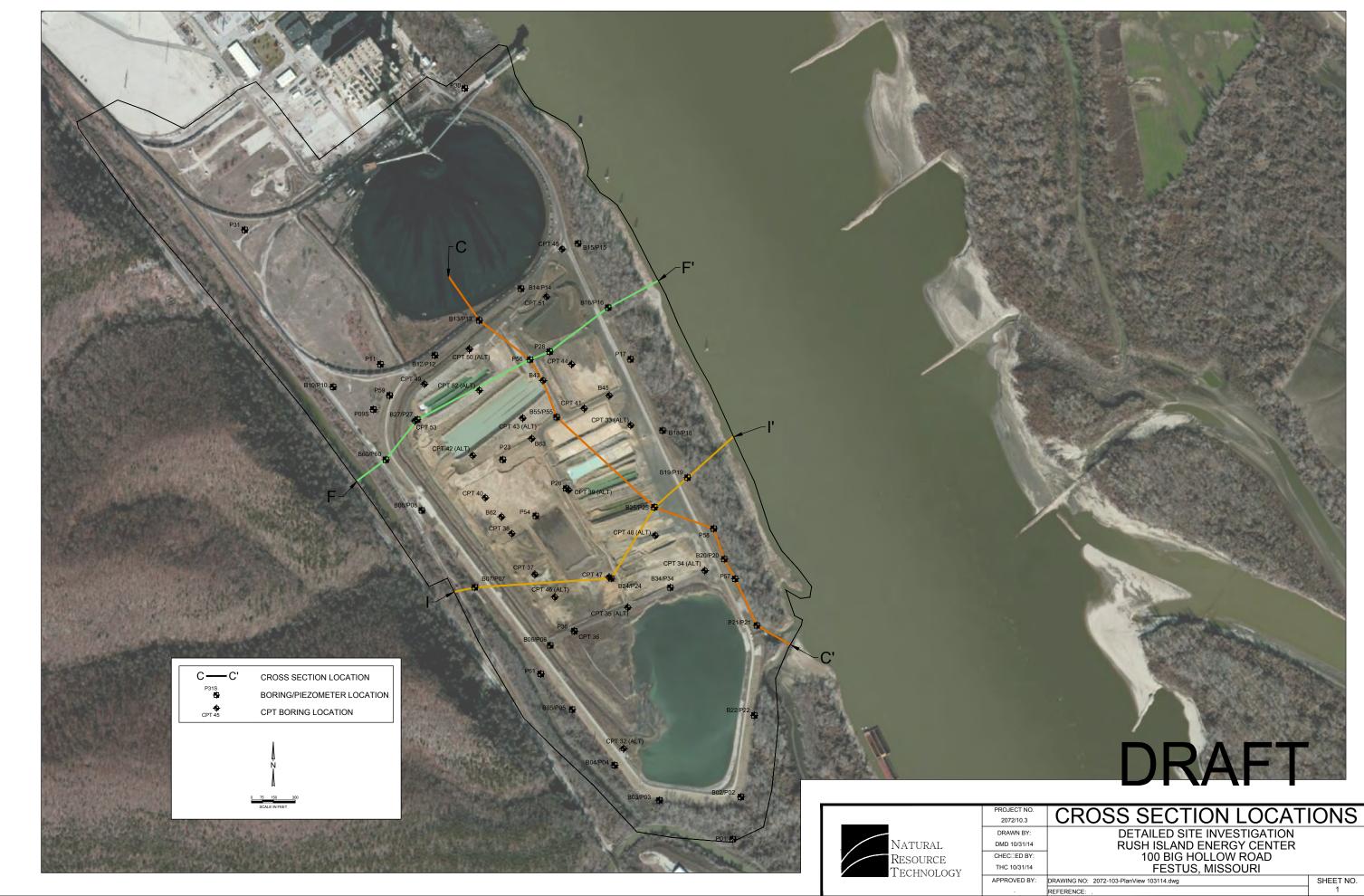
DRAWN BY/DATE:
MDM 1/12/15
REVIEWED BY/DATE:
THC 7/--/14
APPROVED BY/DATE:
BRH 7/--/14

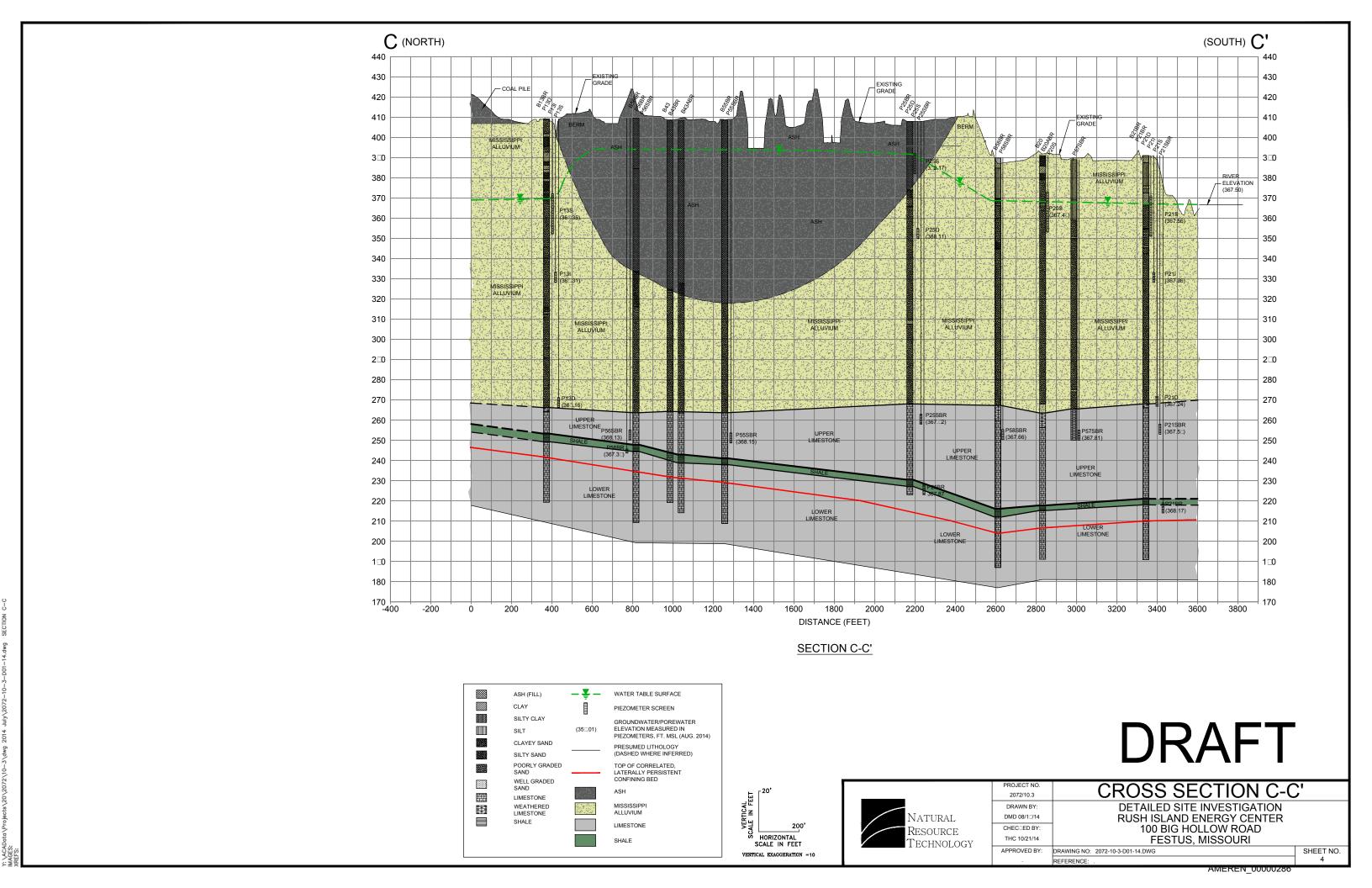
SHALLOW BEDROCK PIEZOMETERS POTENTIOMETRIC SURFACE ELEVATION CONTOUR MAP DECEMBER 11, 2014

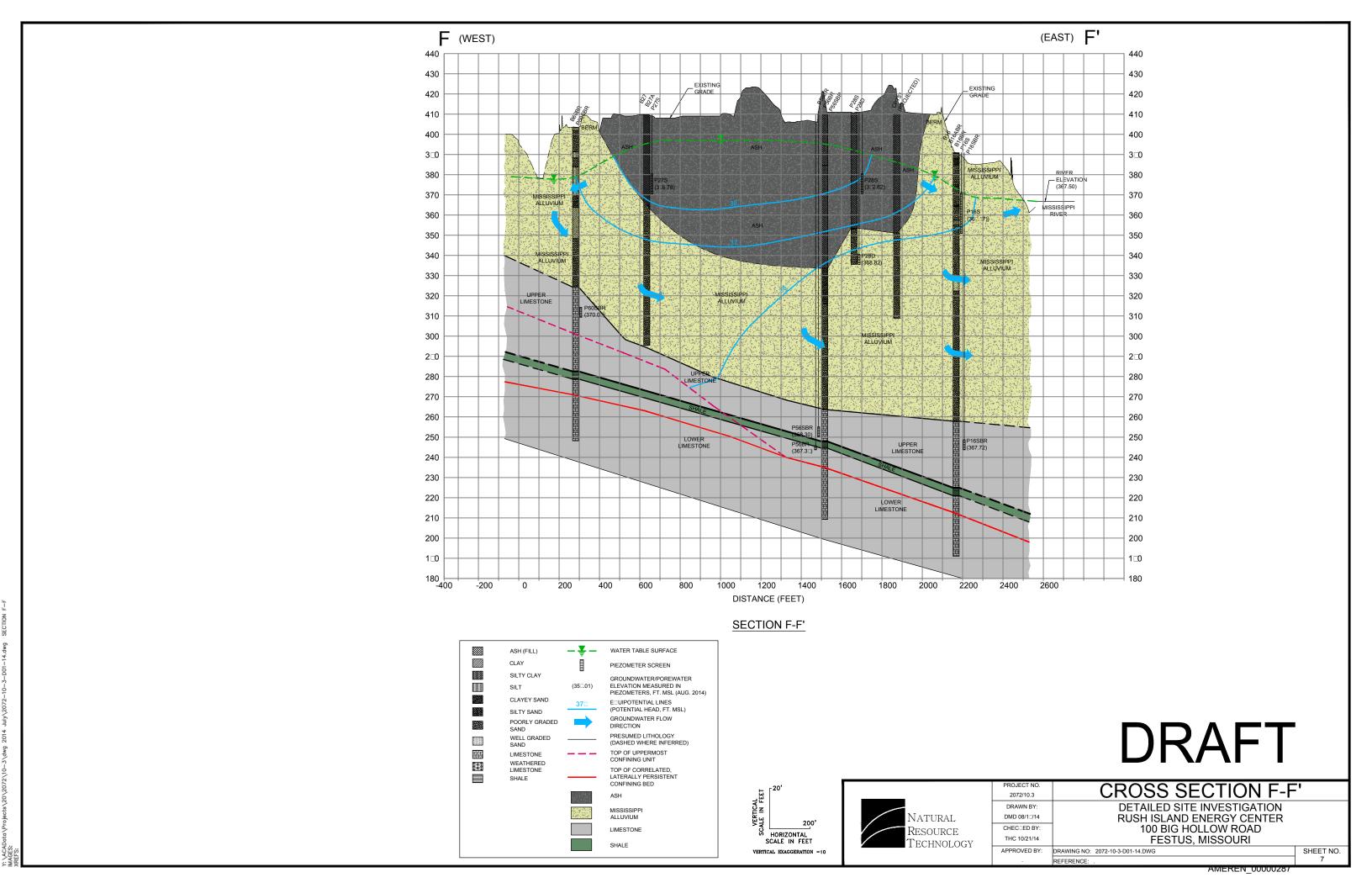
DETAILED SITE INVESTIGATION RUSH ISLAND ENERGY CENTER 100 BIG HOLLOW ROAD FESTUS, MISSOURI PROJECT NO: 2072.1/10.3

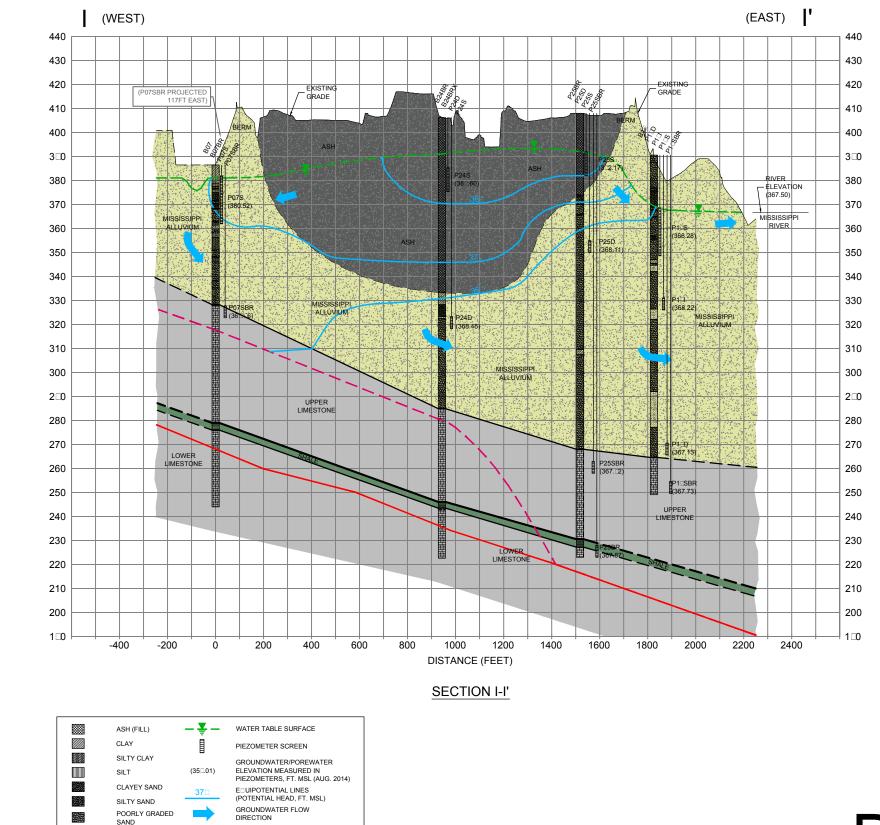
FIGURE NO: PBR - 12/14











HORIZONTAL SCALE IN FEET

VERTICAL EXAGGERATION =10

PRESUMED LITHOLOGY

TOP OF CORRELATED, LATERALLY PERSISTENT CONFINING BED

TOP OF UPPERMOST

CONFINING UNIT

ASH

MISSISSIPPI

LIMESTONE

SHALE

(DASHED WHERE INFERRED)

WELL GRADED

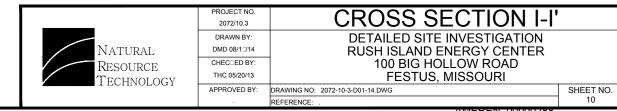
LIMESTONE

WEATHERED LIMESTONE

SAND

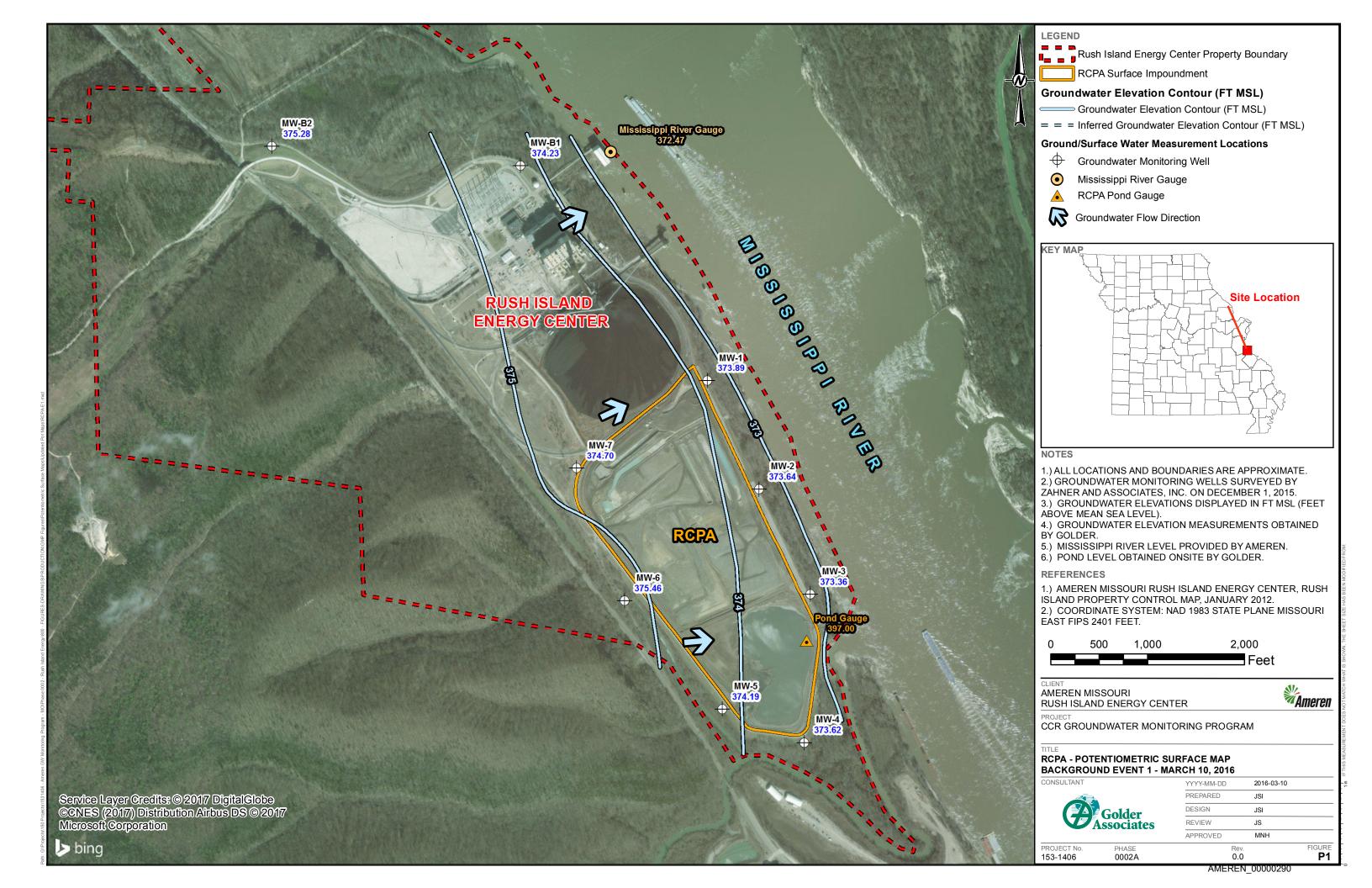
SHALE

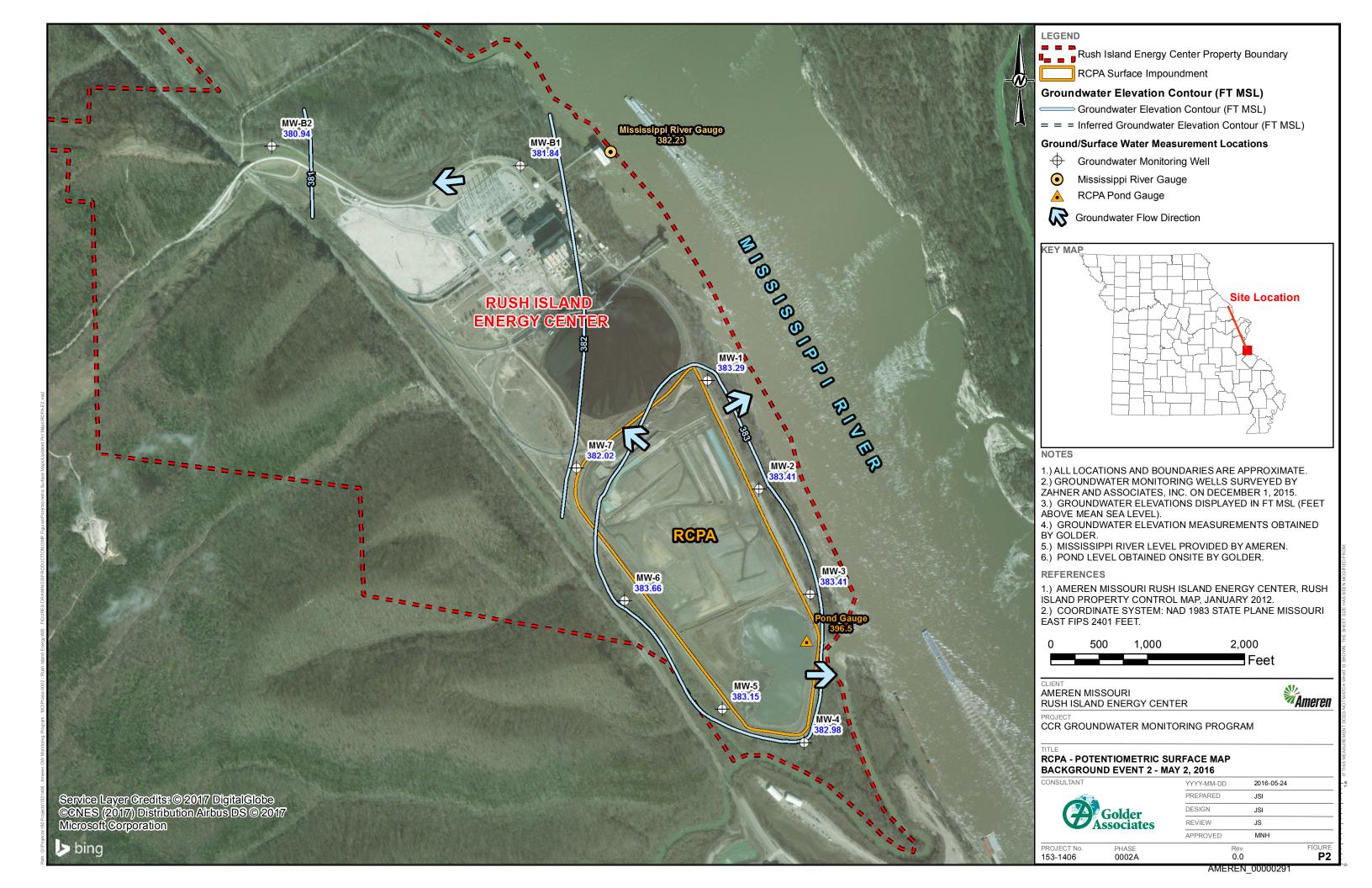
DRAFT

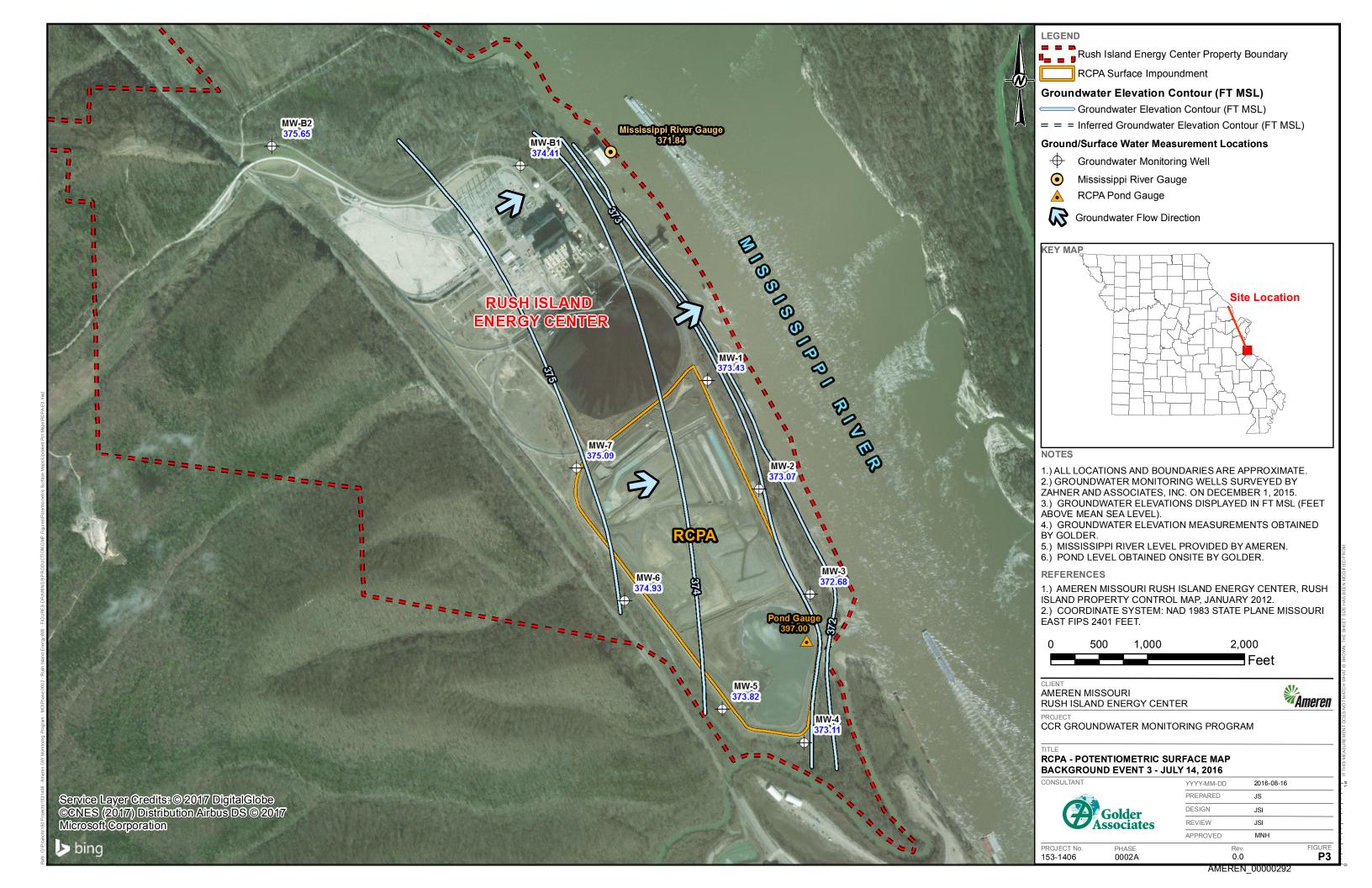


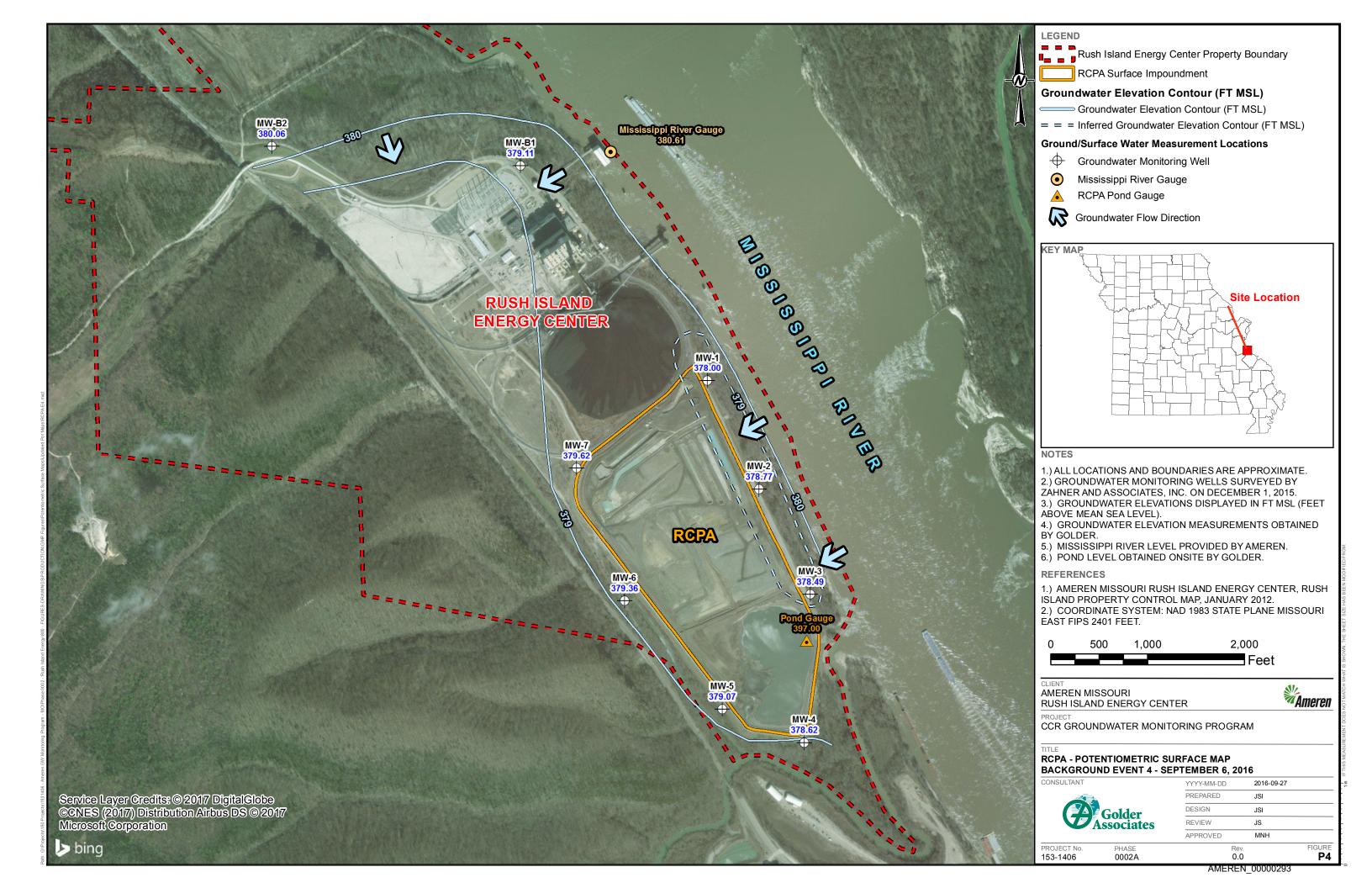
AMEREN_UUUUUZ88

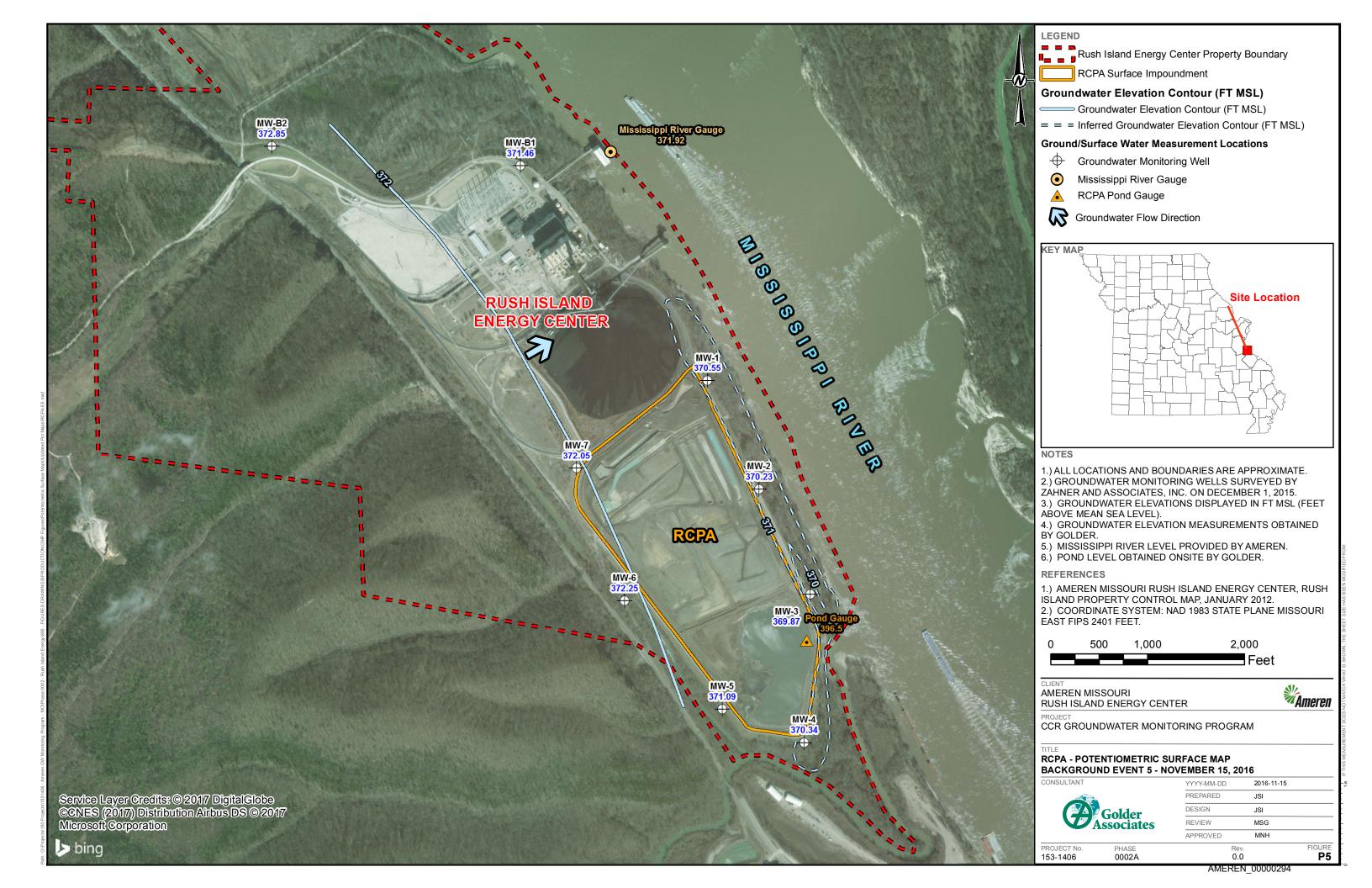
APPENDIX C
Potentiometric Surface Maps From
Background CCR Sampling Events

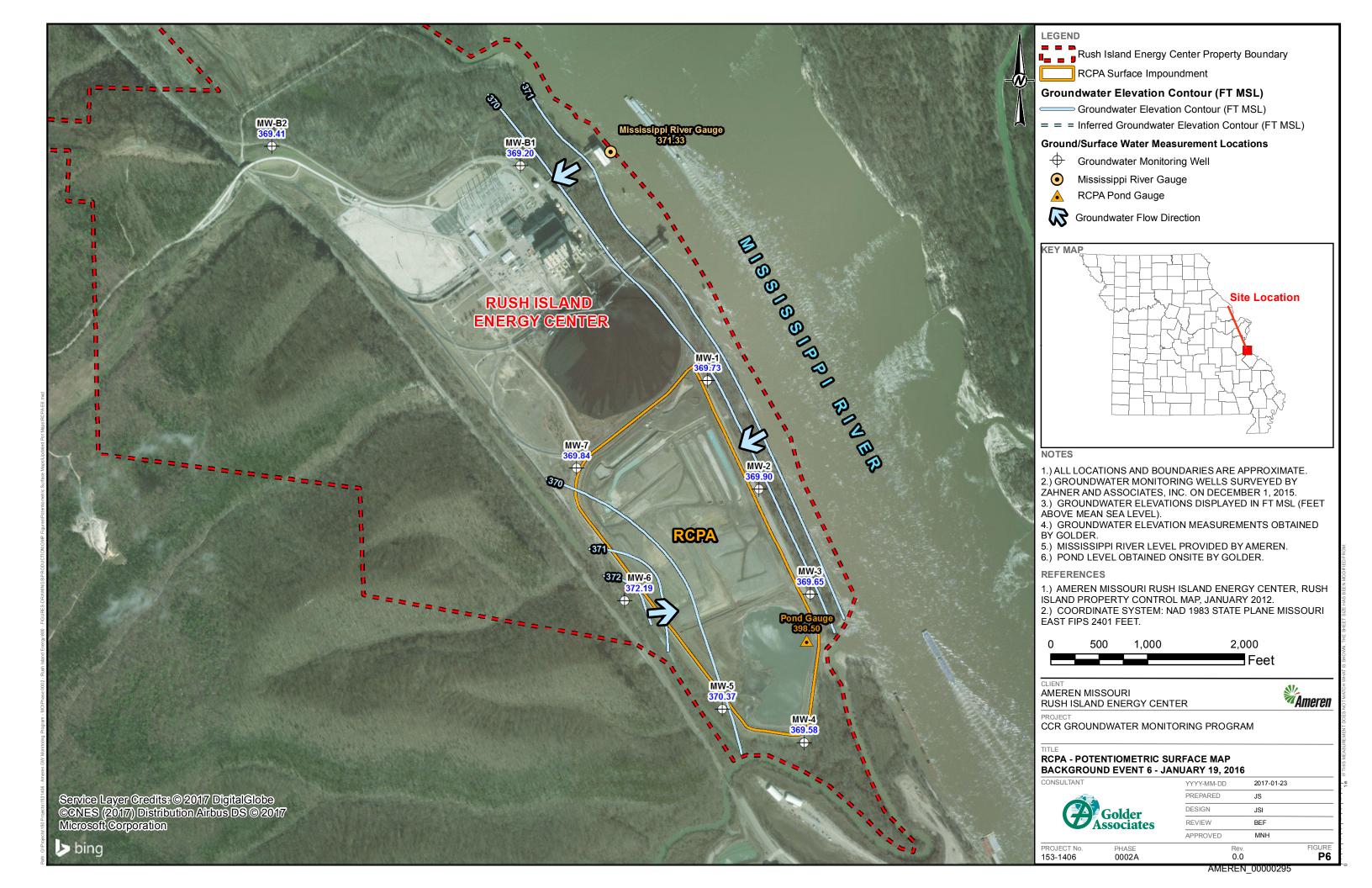


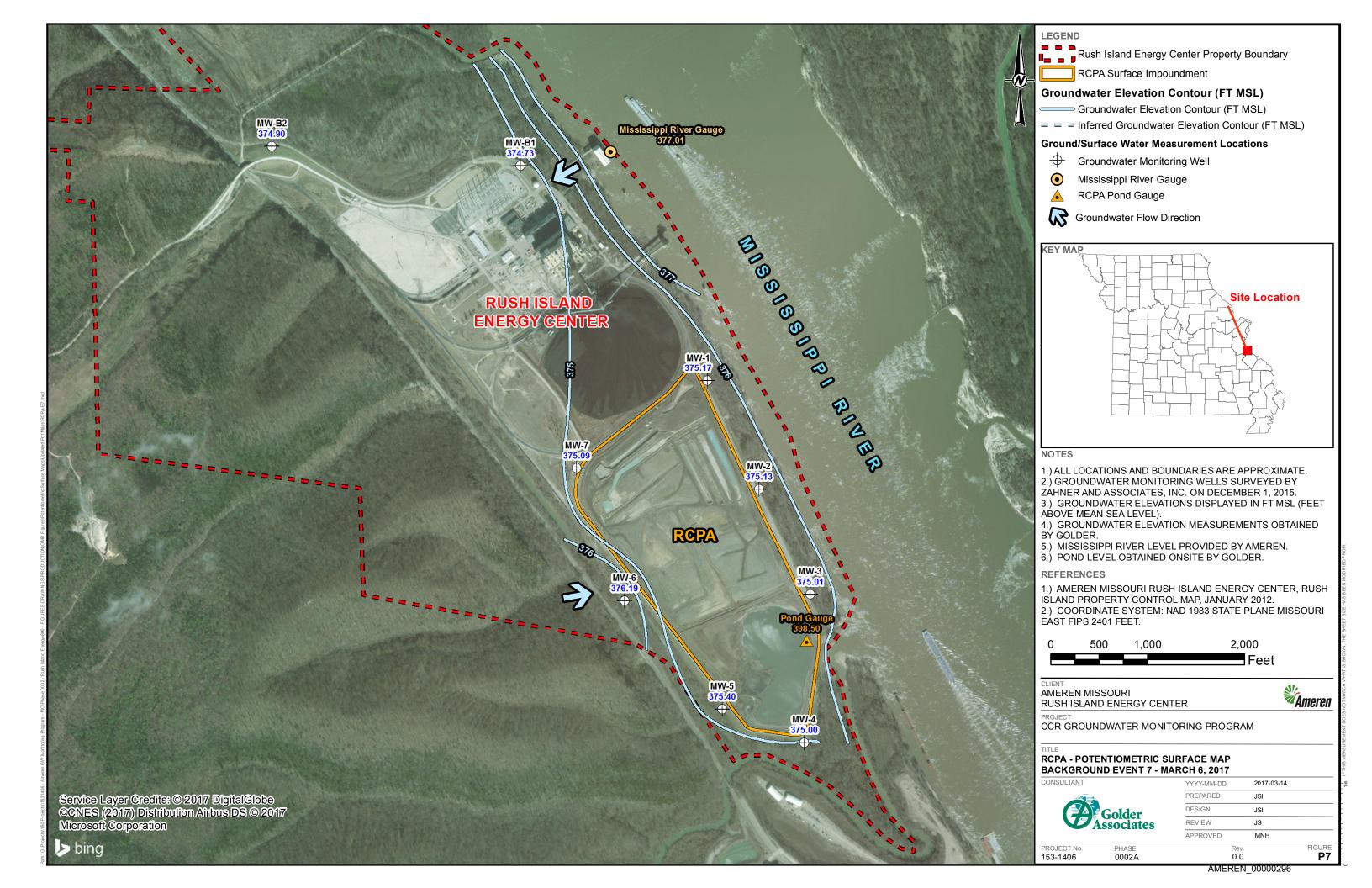


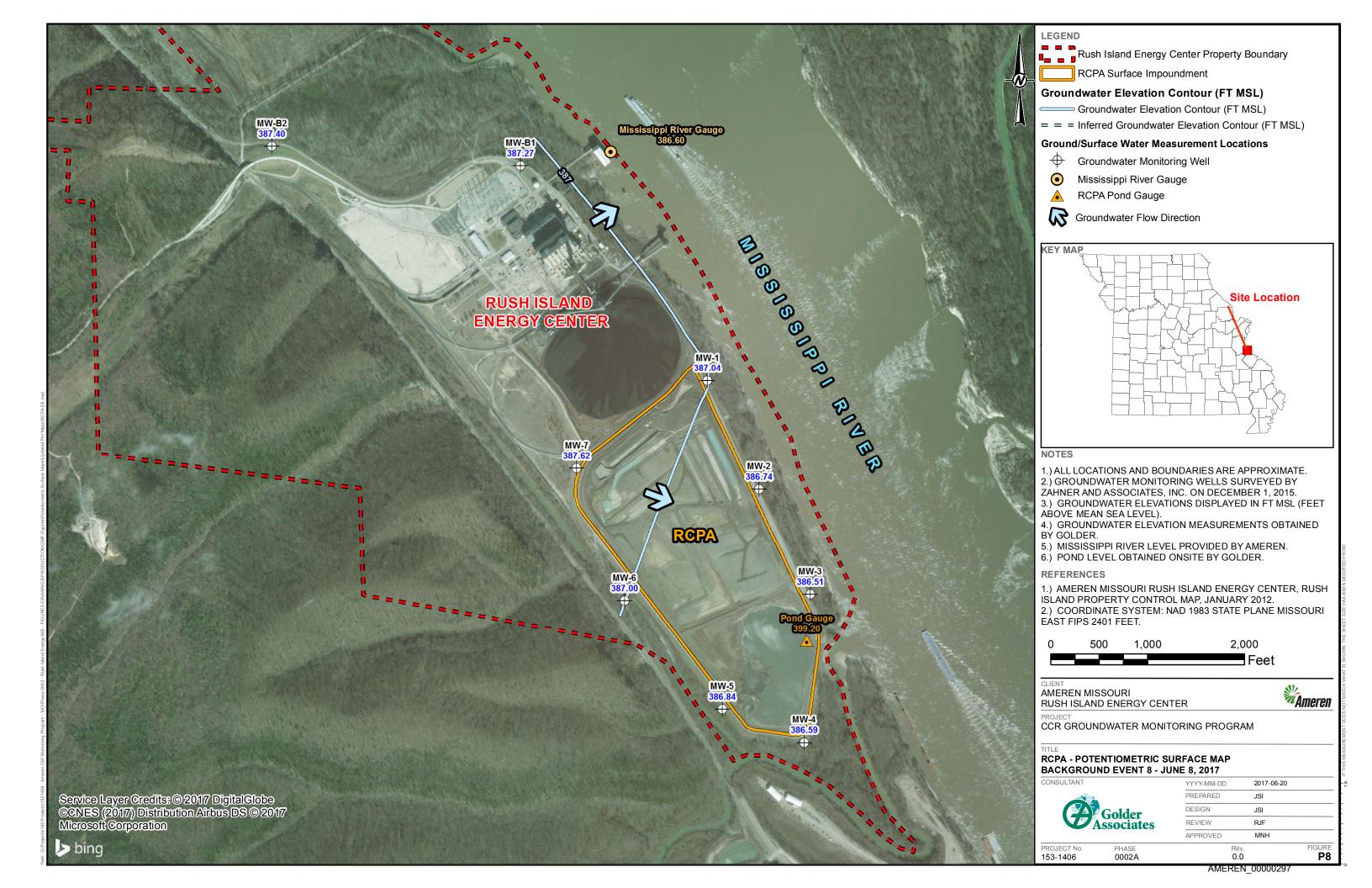










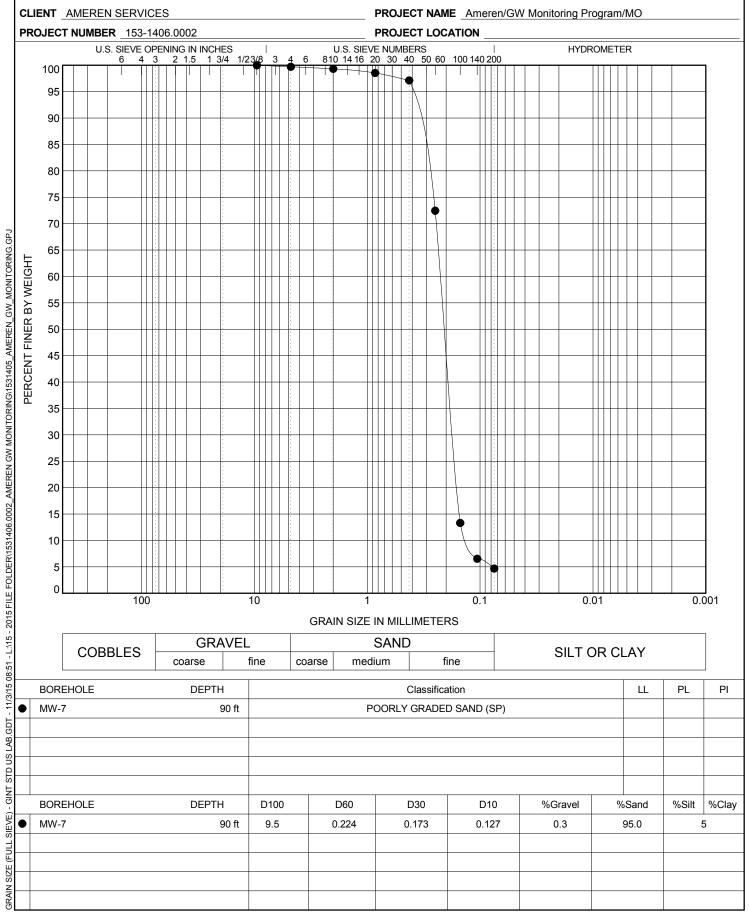


APPENDIX D Grain Size Distribution



500 Century Plaza Drive, Suite 190 Houston, Texas 77073 **Golder** Telephone: (281) 821-6868 Fax: (281) 821-6870

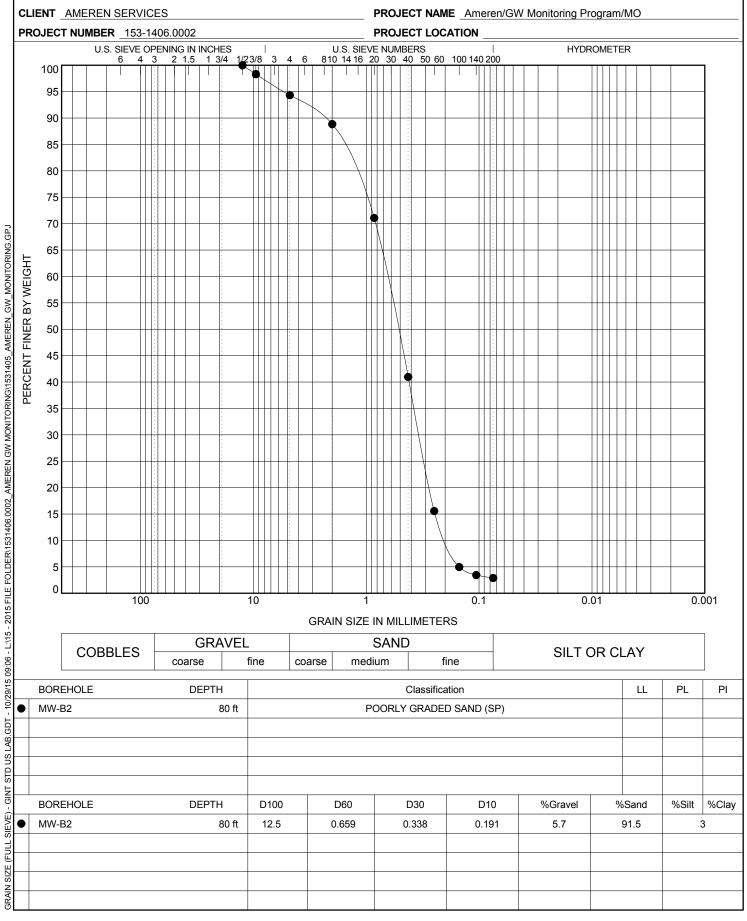
GRAIN SIZE DISTRIBUTION ASTM D6913 Method B





500 Century Plaza Drive, Suite 190 Houston, Texas 77073 **Golder** Telephone: (281) 821-6868 Fax: (281) 821-6870

GRAIN SIZE DISTRIBUTION ASTM D6913 Method B



APPENDIX E
CCR Monitoring Well
Construction Diagrams



ABOVE GROUND MONITORING WELL CONSTRUCTION LOG MW-1 PROJECT NAME: AMEREN CCR GW MONITORING PROJECT NUMBER: 153-1406.0002A SITE NAME: RUSH ISLAND ENERGY CENTER LOCATION: MW-1 CLIENT: AMEREN MISSOURI SURFACE ELEVATION: 393.5 FT MSL GEOLOGIST: J. INGRAM NORTHING: 835384.2 EASTING: 889832.5 DRILLER: J. DRABEK STATIC WATER LEVEL: 25.31 FT BTOC COMPLETION DATE: 10/31/2015 DRILLING COMPANY: CASCADE DRILLING METHODS: SONIC CAP LOCK . - TOP OF CASING ELEVATION: 395.52 FT MSL - PROTECTIVE CASING (yes) no): 4" X 5' ALUMINUM STICK UP: 2.0 FT - PEA GRAVEL OR SAND GROUND SURFACE ELEVATION: 393.5 FT MSL DIAMETER OF RISER PIPE (in.): DIAMETER OF BOREHOLE (in.): ___ CONCRETE SEAL DEPTH (ft. bgs): ______ - TYPE AND AMOUNT OF ANNULAR SEAL: $\frac{3}{8}$ " BENTONITE CHIPS - 2.5 BAGS - TYPE AND AMOUNT OF ANNULAR SEAL: HIGH SOLIDS BENTONITE 4 X 50 POUND BAGS TOP OF BENTONITE SEAL DEPTH (ft. bgs): 61.0 - TYPE AND AMOUNT OF BENTONITE SEAL: $\frac{3}{8}$ BENTONITE CHIPS - 1 BAG - TOP OF SAND PACK DEPTH (ft. bgs): COARSE: 69.0 FINE: 67.0 CENTRALIZER (yes) no) - TYPE: <u>STAINLESS STEEL (TOP + BOTTOM)</u> TOP OF SCREEN DEPTH (ft. bgs): 72.8 TYPE OF SCREEN: 2" X 9.8' SCHEDULE 40 PVC SCREEN SLOT SIZE (in.): 0.010 IN SIZE OF SAND PACK: COARSE: #1 FINE: #0 AMOUNT OF SAND: COARSE: 3 BAGS FINE: 1/2 BAG BOTTOM OF SCREEN DEPTH (ft. bgs): 82.6 BOTTOM OF WELL DEPTH (ft. bgs): 83.0 BOTTOM OF FILTER PACK (ft. bgs): TOTAL DEPTH OF BOREHOLE: 85.0 FT TYPE AND AMOUNT OF BACKFILL: 2.0 FT - NATURAL CAVE IN ADDITIONAL NOTES: FT BGS = FEET BELOW GROUND SURFACE. FT MSL = FEET ABOVE MEAN SEA LEVEL. 400 GALLONS OF H2O USED DURING DRILLING. HORIZONTAL DATUM: STATE PLANE COORDINATES NAD83 US SURVEY FEET (2000) MISSOURI EAST ZONE. VERTICAL DATUM: NAVD88. WELL SURVEYED BY ZAHNER AND ASSOCIATES, INC ON DECEMBER 1, 2015 FT BTOC = FEET BELOW TOP OF CASING. SAND AND BENTONITE BAGS WEIGH 50 LBS EACH.

CHECKED BY: J. INGRAM DATE CHECKED: 4/21/2016

PREPARED BY MEREN JOS 000 2271



PROJECT NAME: AMEREN CCR GW MONITORING

SITE NAME: RUSH ISLAND ENERGY CENTER

CLIENT: AMEREN MISSOURI

GEOLOGIST: J. INGRAM

DRILLER: J. DRABEK

DRILLING COMPANY: CASCADE

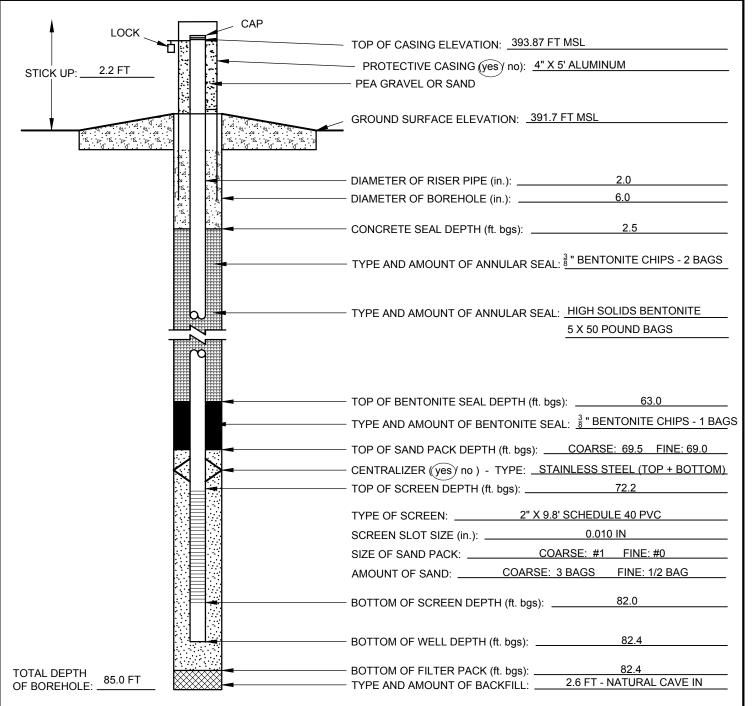
PROJECT NUMBER: 153-1406.0002A

LOCATION: MW-2

SURFACE ELEVATION: 391.7 FT MSL

EASTING: 890364.1

COMPLETION DATE: 10/31/2015



ADDITIONAL NOTES: FT BGS = FEET BELOW GROUND SURFACE. FT MSL = FEET ABOVE MEAN SEA LEVEL.

350 GALLONS OF H2O USED DURING DRILLING. HORIZONTAL DATUM: STATE PLANE COORDINATES NAD83 US SURVEY FEET (2000)
MISSOURI EAST ZONE. VERTICAL DATUM: NAVD88. WELL SURVEYED BY ZAHNER AND ASSOCIATES, INC ON DECEMBER 1, 2015
FT BTOC = FEET BELOW TOP OF CASING. SAND AND BENTONITE BAGS WEIGH 50 LBS EACH.



PROJECT NAME: AMEREN CCR GW MONITORING PROJECT NUMBER: 153-1406.0002A

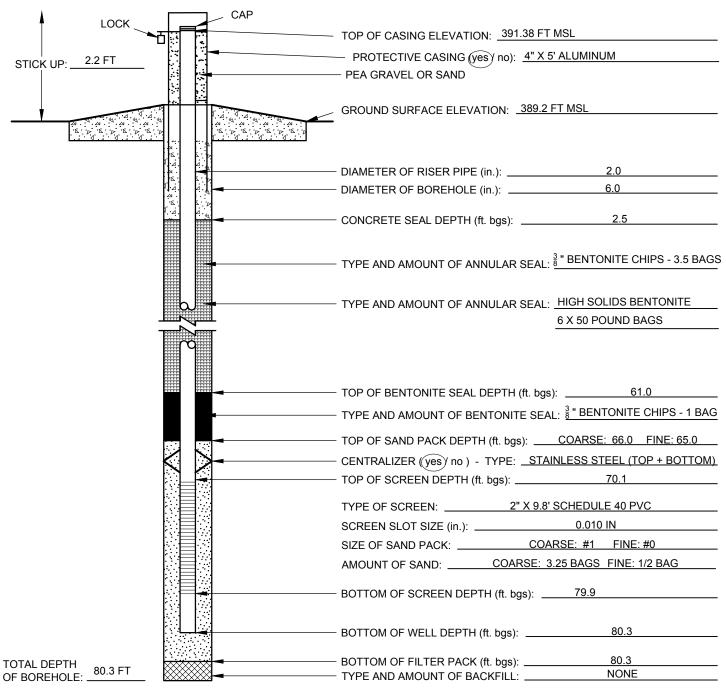
SITE NAME: RUSH ISLAND ENERGY CENTER LOCATION: MW-3

CLIENT: AMEREN MISSOURI SURFACE ELEVATION: 389.2 FT MSL

GEOLOGIST: J. INGRAM NORTHING: 833178.4 EASTING: 890892.7

DRILLER: J. DRABEK STATIC WATER LEVEL: 21.84 FT BTOC COMPLETION DATE: 10/31/2015

DRILLING COMPANY: CASCADE DRILLING METHODS: SONIC



ADDITIONAL NOTES: FT BGS = FEET BELOW GROUND SURFACE. FT MSL = FEET ABOVE MEAN SEA LEVEL.

280 GALLONS OF H20 USED DURING DRILLING. HORIZONTAL DATUM: STATE PLANE COORDINATES NAD83 US SURVEY FEET (2000)
MISSOURI EAST ZONE. VERTICAL DATUM: NAVD88. WELL SURVEYED BY ZAHNER AND ASSOCIATES, INC ON DECEMBER 1, 2015
FT BTOC = FEET BELOW TOP OF CASING. SAND AND BENTONITE BAGS WEIGH 50 LBS EACH.

CHECKED BY: J. INGRAM

DATE CHECKED: 4/21/2016

PREPARED BY MEREN JOS 0032 1



PROJECT NAME: AMEREN CCR GW MONITORING
SITE NAME: RUSH ISLAND ENERGY CENTER
CLIENT: AMEREN MISSOURI
GEOLOGIST: J. INGRAM
NORTHING: 831647.5
DRILLER: J. DRABEK
STATIC WATER LEVEL: 22.64 FT BTOC
DRILLING COMPANY: CASCADE

PROJECT NUMBER: 153-1406.0002A

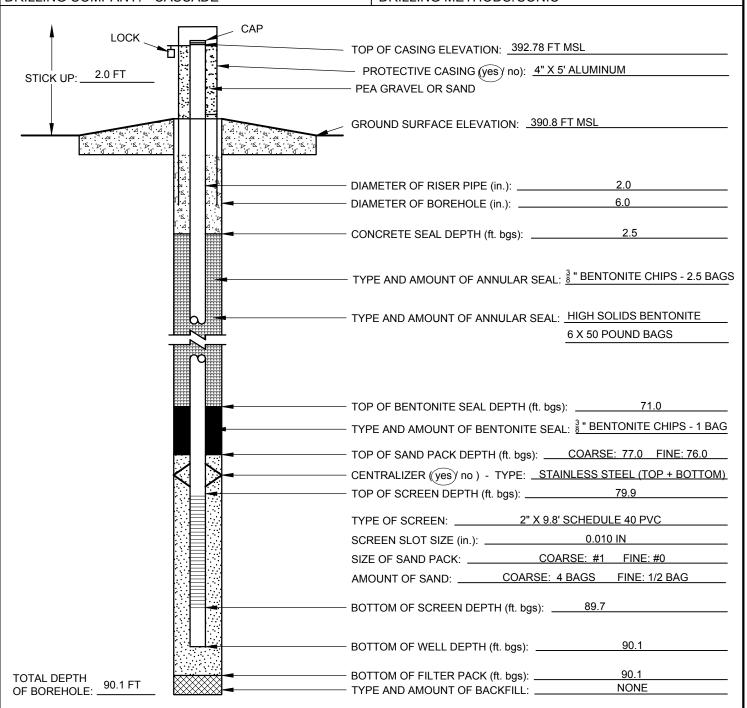
LOCATION: MW-4

SURFACE ELEVATION: 390.8 FT MSL

EASTING: 890830.5

DRILLING COMPANY: CASCADE

DRILLING METHODS: SONIC



ADDITIONAL NOTES: FT BGS = FEET BELOW GROUND SURFACE. FT MSL = FEET ABOVE MEAN SEA LEVEL.

325 GALLONS OF H2O USED DURING DRILLING. HORIZONTAL DATUM: STATE PLANE COORDINATES NAD83 US SURVEY FEET (2000)

MISSOURI EAST ZONE. VERTICAL DATUM: NAVD88. WELL SURVEYED BY ZAHNER AND ASSOCIATES, INC ON DECEMBER 1, 2015

FT BTOC = FEET BELOW TOP OF CASING. SAND AND BENTONITE BAGS WEIGH 50 LBS EACH.

CHECKED BY: J. INGRAM

DATE CHECKED: 4/21/2016

PREPARED BY MERENLOSOOSE ZI



ABOVE GROUND MONITORING WELL CONSTRUCTION LOG MW-5 PROJECT NAME: AMEREN CCR GW MONITORING PROJECT NUMBER: 153-1406.0002A SITE NAME: RUSH ISLAND ENERGY CENTER LOCATION: MW-5 CLIENT: AMEREN MISSOURI SURFACE ELEVATION: 388.0 FT MSL GEOLOGIST: J. INGRAM NORTHING: 831994.9 EASTING: 889984.5 DRILLER: J. DRABEK STATIC WATER LEVEL: 19.38 FT BTOC COMPLETION DATE: 10/29/2015 DRILLING COMPANY: CASCADE DRILLING METHODS: SONIC CAP LOCK . TOP OF CASING ELEVATION: 390.36 FT MSL - PROTECTIVE CASING (yes) no): 4" X 5' ALUMINUM STICK UP: ___2.4 FT PEA GRAVEL OR SAND GROUND SURFACE ELEVATION: 388.0 FT MSL DIAMETER OF RISER PIPE (in.): DIAMETER OF BOREHOLE (in.): __ CONCRETE SEAL DEPTH (ft. bgs): - TYPE AND AMOUNT OF ANNULAR SEAL: $\frac{3}{8}$ "BENTONITE CHIPS - 1.5 BAGS - TYPE AND AMOUNT OF ANNULAR SEAL: HIGH SOLIDS BENTONITE 3 X 50 POUND BAGS - TOP OF BENTONITE SEAL DEPTH (ft. bgs): 46.0 - TYPE AND AMOUNT OF BENTONITE SEAL: $\frac{3}{8}$ BENTONITE CHIPS - 1 BAG - TOP OF SAND PACK DEPTH (ft. bgs): COARSE: 53.0 FINE: 51.5 CENTRALIZER (yes) no) - TYPE: <u>STAINLESS STEEL (TOP + BOTTOM)</u> TOP OF SCREEN DEPTH (ft. bgs): 55.0 TYPE OF SCREEN: 2" X 4.8' SCHEDULE 40 PVC SCREEN SLOT SIZE (in.): 0.010 IN COARSE: #1 FINE: #0 SIZE OF SAND PACK: _____ AMOUNT OF SAND: COARSE: 2 BAGS FINE: 1/2 BAG BOTTOM OF SCREEN DEPTH (ft. bgs): 59.8 BOTTOM OF WELL DEPTH (ft. bgs): _____ BOTTOM OF FILTER PACK (ft. bgs): ____ TOTAL DEPTH OF BOREHOLE: 64.0 FT TYPE AND AMOUNT OF BACKFILL: 3.8 FT - NATURAL CAVE IN

ADDITIONAL NOTES: FT BGS = FEET BELOW GROUND SURFACE. FT MSL = FEET ABOVE MEAN SEA LEVEL. 150 GALLONS OF H2O USED DURING DRILLING. HORIZONTAL DATUM: STATE PLANE COORDINATES NAD83 US SURVEY FEET (2000) MISSOURI EAST ZONE. VERTICAL DATUM: NAVD88. WELL SURVEYED BY ZAHNER AND ASSOCIATES, INC ON DECEMBER 1, 2015 FT BTOC = FEET BELOW TOP OF CASING. SAND AND BENTONITE BAGS WEIGH 50 LBS EACH.



PROJECT NAME: AMEREN CCR GW MONITORING PROJECT NUMBER: 153-1406.0002A

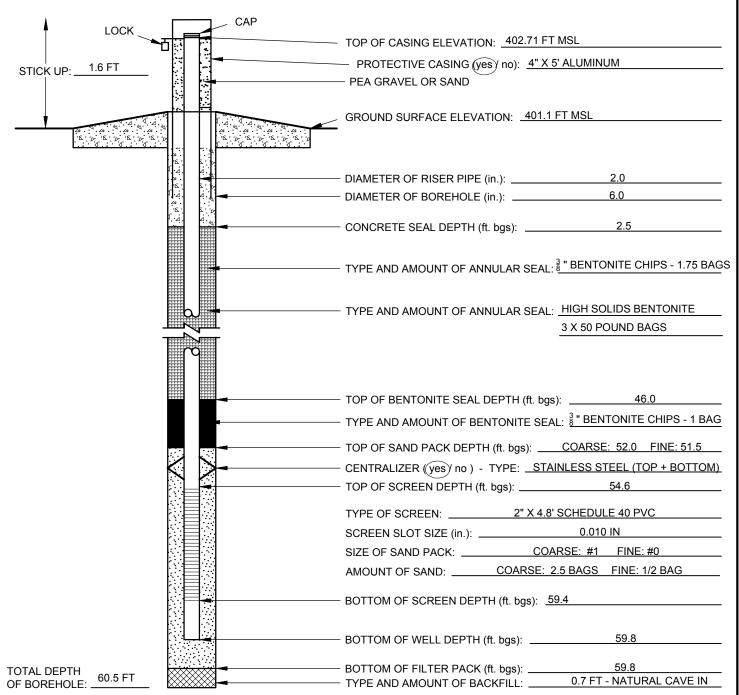
SITE NAME: RUSH ISLAND ENERGY CENTER LOCATION: MW-6

CLIENT: AMEREN MISSOURI SURFACE ELEVATION: 401.1 FT MSL

GEOLOGIST: J. INGRAM NORTHING: 833111.0 EASTING: 888977.0

DRILLER: J. DRABEK STATIC WATER LEVEL: 36.11 FT BTOC COMPLETION DATE: 10/28/2015

DRILLING COMPANY: CASCADE DRILLING METHODS: SONIC



ADDITIONAL NOTES: FT BGS = FEET BELOW GROUND SURFACE. FT MSL = FEET ABOVE MEAN SEA LEVEL.

120 GALLONS OF H2O USED DURING DRILLING. HORIZONTAL DATUM: STATE PLANE COORDINATES NAD83 US SURVEY FEET (2000)
MISSOURI EAST ZONE. VERTICAL DATUM: NAVD88. WELL SURVEYED BY ZAHNER AND ASSOCIATES, INC ON DECEMBER 1, 2015
FT BTOC = FEET BELOW TOP OF CASING. SAND AND BENTONITE BAGS WEIGH 50 LBS EACH.

CHECKED BY: J. INGRAM

DATE CHECKED: 4/21/2016



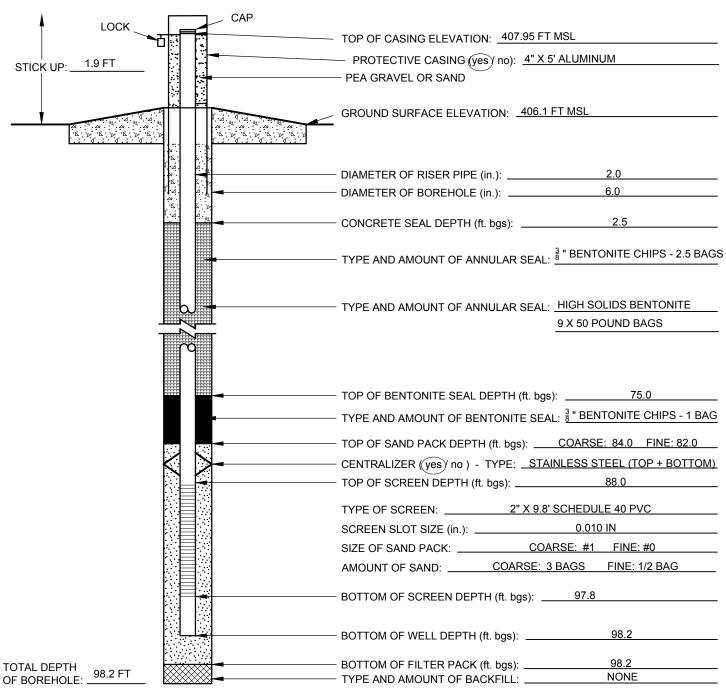
PROJECT NAME: AMEREN CCR GW MONITORING
SITE NAME: RUSH ISLAND ENERGY CENTER
CLIENT: AMEREN MISSOURI
GEOLOGIST: J. INGRAM
DRILLER: J. DRABEK
STATIC WATER LEVEL: 36.11 FT BTOC
DRILLING COMPANY: CASCADE

PROJECT NUMBER: 153-1406.0002A
LOCATION: MW-7
SURFACE ELEVATION: 406.1 FT MSL
EASTING: 888483.3

EASTING: 888483.3

DRILLING COMPANY: CASCADE

DRILLING METHODS: SONIC



ADDITIONAL NOTES: FT BGS = FEET BELOW GROUND SURFACE. FT MSL = FEET ABOVE MEAN SEA LEVEL.

400 GALLONS OF H2O USED DURING DRILLING. HORIZONTAL DATUM: STATE PLANE COORDINATES NAD83 US SURVEY FEET (2000)

MISSOURI EAST ZONE. VERTICAL DATUM: NAVD88. WELL SURVEYED BY ZAHNER AND ASSOCIATES, INC ON DECEMBER 1, 2015

FT BTOC = FEET BELOW TOP OF CASING. SAND AND BENTONITE BAGS WEIGH 50 LBS EACH.



Associates	ABOVE G		ING WELL CONSTI	MINISTRAL MANAGEMENT
PROJECT NAME: AM	EREN CCR GW	/ MONITORING	PROJECT NUMBER:	153-1406.0002A
SITE NAME: RUSH IS	SLAND ENERG	Y CENTER	LOCATION: MW-B1	
CLIENT: AMEREN N	MISSOURI		SURFACE ELEVATION	N: 409.6 FT MSL
GEOLOGIST: J. INGR.	AM	NORTHING: 837602.		EASTING: 887903.9
DRILLER: J. DRABI		STATIC WATER LEV		COMPLETION DATE: 10/28/2015
DRILLING COMPANY:	CASCADE		DRILLING METHODS	S: SONIC
STICK UP: 2.0 FT		PE.	P OF CASING ELEVATION: _ ROTECTIVE CASING (yes) r A GRAVEL OR SAND DUND SURFACE ELEVATION	no): 4" X 5' ALUMINUM
		DIAI	METER OF RISER PIPE (in.):	:2.0
		DIAI	METER OF BOREHOLE (in.):	6.0
		CON	NCRETE SEAL DEPTH (ft. bg	gs):
	10000 00000 00000 00000 00000 00000 00000	TYF	PE AND AMOUNT OF ANNUL	LAR SEAL: $\frac{3}{8}$ " BENTONITE CHIPS - 3.5 BAG
		TYP	E AND AMOUNT OF ANNUL	AR SEAL: HIGH SOLIDS BENTONITE 6 X 50 POUND BAGS
				PTH (ft. bgs): $\frac{79.0}{8}$ BENTONITE CHIPS - 1 BAG
		TOF	OF SAND PACK DEPTH (ft.	. bgs):COARSE: 86.0 FINE: 84.0
		CEN	ITRALIZER ((yes) no) - TYI	PE: STAINLESS STEEL (TOP + BOTTOM)
		TOF	OF SCREEN DEPTH (ft. bgs	s): <u>89.8</u>
		TYP	PE OF SCREEN:	2" X 9.8' SCHEDULE 40 PVC
		SCF	REEN SLOT SIZE (in.):	0.010 IN
		SIZE	E OF SAND PACK:	COARSE: #1 FINE: #0
		AMO	OUNT OF SAND:C	OARSE: 3 BAGS FINE: 1/2 BAG
		——— ВОТ	TOM OF SCREEN DEPTH (f	ft. bgs): 99.6
		——— ВОТ	TOM OF WELL DEPTH (ft. b	ogs):
TOTAL DEPTH OF BOREHOLE: 100.0 F	Т		TOM OF FILTER PACK (ft. b E AND AMOUNT OF BACKF	NONE
ADDITIONAL NOTES: FT	BGS = FEET BELC		MSL = FEET ABOVE MEAN	N SEA LEVEL. ATES NAD83 US SURVEY FEET (2000)
				IATES, INC ON DECEMBER 1, 2015
•		SAND AND BENTONITE BA		

CHECKED BY: J. INGRAM

DATE CHECKED: 4/21/2016



PROJECT NAME: AMEREN CCR GW MONITORING PROJECT NUMBER: 153-1406.0002A

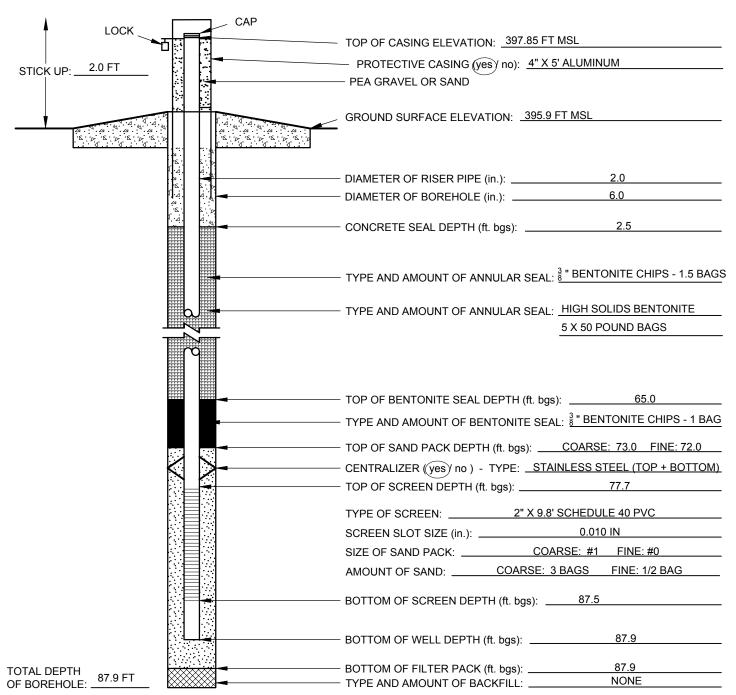
SITE NAME: RUSH ISLAND ENERGY CENTER LOCATION: MW-B2

CLIENT: AMEREN MISSOURI SURFACE ELEVATION: 395.9 FT MSL

GEOLOGIST: J. INGRAM NORTHING: 837801.7 EASTING: 885337.2

DRILLER: J. DRABEK STATIC WATER LEVEL: 24.32 FT BTOC COMPLETION DATE: 10/27/2015

DRILLING COMPANY: CASCADE DRILLING METHODS: SONIC



ADDITIONAL NOTES: FT BGS = FEET BELOW GROUND SURFACE. FT MSL = FEET ABOVE MEAN SEA LEVEL.

250 GALLONS OF H2O USED DURING DRILLING. HORIZONTAL DATUM: STATE PLANE COORDINATES NAD83 US SURVEY FEET (2000)
MISSOURI EAST ZONE. VERTICAL DATUM: NAVD88. WELL SURVEYED BY ZAHNER AND ASSOCIATES, INC ON DECEMBER 1, 2015
FT BTOC = FEET BELOW TOP OF CASING. SAND AND BENTONITE BAGS WEIGH 50 LBS EACH.

APPENDIX F Well Development Forms

Project Ref: Ameren GW Monitoring	Project No.	o.: 153-1406.
Location MW-1 Monitored By: JS Date	//////////////////////////////////////	0520
Well Piezometer Data		
(circle one) Depth of Well (from top of PVC or ground)	85.06 FOC. 1	eet
Depth of Water (from top of PVC or ground)	28.89 TOC	eet
Radius of Casing		eet 400 al 66an Arillas
Casing Volume	12.6 × 3 = 40.6	subic feet + 400 gal from drilling pallons 440 gal
Development / Purging Discharg		
Purging Method	Waterra pump	
Start Purging Date	[1] \$ /15 Time	0820

Monitoring

Stop Purging

Date	Time	Volume Discharge (gals)	Temp (°)	pН	Spec.Cond. (S/cm)	Turbidity (NTU)	Dissolved Oxygen (mg/L)	Redox Potential (+/- mV)	WL (ft BTOC)	Appearance of Water and Comments
1615	0835	35		9.25	0.866	7/000	1.06	-13.6	29.05	Very muddy
111	0845	50	19.31	9.64	0.857	76000	0.66	-18.4	29.06	middly 1
	0900	75	19.24	6.04	6.832	71000	0.82	-55	28.91	Muddly
\perp	0915	120	14.33	10.16	0.843	21000	0.67	-63.4	28.95	much
	0930	130	19.31	10,20	008	77.8	1,09	-22.0	28.91	Cloudy
	0945	160	19.30	10.43	PFFO	37.7	0.58	-37.5	21.97	Slight cloudy
	1000	180	14.24	100	0.770	71000	0.81	-29.0	28.80	Cloudy
	1015	200	19.35	10.40	0.795	31.6	1.64	-28-7	28-89	adm blight cloud
	1035	240	_	_	- /	- 5	_	_		pretty clear
	1105	260	9.14	10.03	0.789	6.78	1.57	15.1	28.96	Clear
- 1	1120	285		10.21	12-78Z	2.63	1-21	5.6	18.85	clear
	1135	310	19-21	10.46	0.781	3.58	0.84	-15.6	58.85	cler
	1145	340	14.23	10.48	0.780	3.49	0.75	-24.7	28.81	CLAV
	1200	355	19-22	10.50	0.776	4.02	0.63	-29.7	28.76	clear
	1215	370	19.21	16:92	0.786	7.84	0.85	-60.5	2872	clear
	1230	400	19.22	10.90	0.773	2.34	0.71	-65.4	28.80	dear
	1240	430	19.22	1090	0.773	2.28	0.72	-71.5	28.84	clear
	1245	440	14.23	10.97	0.777	2.30	0.75	-7(.3	28-80	cler
										Š.
								4.5		
					,	 		-		
							- 4			******
		A								

Project	Ref: A	meren GW	Monito	ring			Project N	10.: 153-1	406.	
Locati	ion	MW-2								
Monitore		75		Date	11/9/15		Time	0709		
MOTILOTE	u by.	43		Date	11111111		111110	0701		
Well P	Piezom	eter Data	ì							
Depth of \	Mell (from	(circle one)	around)	1	84.59		t01	feet		
		n top of PVC			20.48		TOC	feet		
Radius of		in op or i vo	or ground)		a		100	inches		
								feet		
Casing Vo	olume					~ //-		cubic feet	+ 35	392 gal total
					3.80	3= 41.	5	gallons	<	ego and total
Devel	opmen	t / Purgii	na Disa	charge	Data				-	214 9-1
Purging N			.5	J	Waterra	Pump				
Start Purg				Date	11/9/15		Time	073	8	
Stop Purg				Date	11/9/15		Time	1311		
Otop : u.s	,9							, , ,	<u> </u>	
Monitorin	g							,		
		Volume	Temp		Spec.Cond.	Turbidity	Dissolved	Redox	WL (ft	
Date	Time	Discharge (gals)	(°)	pН	(_S/cm)	(NTU)	Oxygen (mg/L)	Potential (+/- mV)	BTOC)	Appearance of Water and Comments
11/9/15	6915	180	l			71000		<u> </u>		muddy
119115	1116	185	17.42	10,44	0.839	7/000	036	-87.6	2136	muddy
	1136	240	16.71	ID.46	0.834	71000	0.66	-100.9	27.56	muddy
	1146	255	16.72	10.57	0.835	000K	0.52	-110.6	28.08	molds
	1156	270	6.78	10.65	0.836	71000	1.04	-115.0	28.20	muddly (slightly)
5 1	1206	290	16.49	10.69	0.838	71000	1.79	-112.5	27.65	5.132 + moddy
	1216	330	16.11	10.96	0.834	83.4	0.89	-113.5	27.47	Cloudy
\vdash	1336	340	16.34	10.72	0.836	31.5	1.10	10 A	27.60	cloudy
	1296	350	16-63	10.74	0.832	22.0	0.91	-1753	27.64	Cloudy Slight clouds
	1251	370	16.91	10.73	0-839	22.7	1.27	-126.9	27.61	Slight cloudy
	1255	390	10.002	10.75		83.9	1.31	-1343	A	Slightly cloudy
	1305	400	16.87	10.76	0.839	23.6	1-31	-128.6	27.11	SINUITY cloudy
	1315	410	16.85	10.76	0.838	27.1	1,25	-126.9		slight cloudy
	1313	(10	10/42	10.76	0.00	-		100	6.7.10	3(4)
				1	75	2,31	100		- × T	
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Locati	on	MW	3							
/lonitore	d By:	22		Date	11/4/15		Time	0846		
Vell P	iezomo	eter Data	1			1				
epth of V	Nell (from∕	(circle one) op of PVC or	ground)	ı	82.4	16 T	٥٢	feet		
		n top of PVC		i	25.	96 to	C	feet		
adius of			,	i	211			inches		
aulus Ol	Casing							feet		Ø.
Casina Va	dumo			i				162	1 280	gal drilling
asing Vo	orume				13.4	9-1-	3	gallons	7 280	7
				'	k	7 =	40.19			2 320 gold
Devel	opmen	t / Purgii	ng Disc	charge	Data		(2 250 901 0
ourging N	lethod	/			Water	ma pun	19.30			
Start Purg	ing			Date	11/9/15	1 933	Time	0846	40	
Stop Purg	iina			Date	114/15		Time	160		
				- 200				- 1g/1		•
Monitoring	9									,
		Volume	Ta		001	T. abidib.	Dissolved	Redox	18/1 /64	
Date	Time	Discharge	(°)	pН	Spec.Cond. (S/cm)	Turbidity (NTU)	Oxygen	Potential	WL (ft BTOC)	Appearance of Water and Comments
		(gals)	_ `	356,560			(mg/L)	(+/- mV)	,	
14/15	MCL									
-1-11-2		20	16.06	9.48	1.565	71000	1.08	-1.5	26.30	moddy
	0905	25	16.19	10.22	1.479	71000	0.44	-31.1	76.19	Muddy
	0905	25 45	16.20	10.22	1.479	71000	0.41	-31.1	76.19	muddy muddy
	0905	45 45	16.20	10.22	1.296	71000	0.41	-31.1 -56.9 -60.7	26.19 26.12 26.10	muldy muddy muddy
	0905	45 45 65 85	16.20	(0.22 (0.44 (0.52 10.57	1.296	71000 71000 71000	0.41	-31.1 -56.9 -60.7 -82.9	26.19 26.12 26.10 26.11	muddy muddy muddy moddy
	0905	25 45 65 85 100	16.20	10.22	1.296	71000	0.41	-31.1 -56.9 -60.7	26.19 26.12 26.10	muldy muddy muddy
	0905	45 45 65 85	16.20	(0.22 (0.44 (0.52 (0.57	1.479 1.369 1.296 1.234 1.189	71000 71000 71000	0.41	-31.1 -56.9 -60.7 -82.9	26.19 26.12 26.10 26.11	muddy muddy muddy muddy muddy
	0905	25 45 65 85 100 115	16.20	(0.22 (0.44 (0.52 (0.52	1.296	71000 71000 71000 71000	0.44	-31.1 -56.9 -60.7 -22.9 -93.0	76.19 76.12 26.10 26.11 26.27	muddy muddy muddy moddy
	0905 0917 6946 0935 0945 0957	25 45 65 85 100 115	16.20 16.22 16.24 16.20	(0.22 (0.44 (0.52 (0.58 10.40	1.479 1.369 1.296 1.234 1.189	71000 71000 71000 71000 71000	0.44 0.41 0.42 0.07 0.19	-31.1 -56.9 -60.7 -82.9 -93.0	26.19 26.12 26.10 26.11 26.27	muddy muddy muddy muddy muddy
	0905 0917 6946 0935 0945 0957 1023 1033 1043	25 45 45 85 100 115 145 465 185	16.20 16.22 16.24 16.20	(0.22 (0.44) (0.52) (0.57) (0.40) (0.40) (0.40)	1.479 1.369 1.296 1.234 1.189	71000 71000 71000 71000 71000 71000	0.44 0.41 0.42 0.07 0.19 0.12 0.07 0.05 0.40	-31.1 -56.9 -60.7 -82.9 -93.0 -50.2 -H.3 -71.7 -84.3	76.19 76.12 26.10 26.11 26.27 26.09 26.09 26.05 26.01	muddy muddy muddy muddy muddy muddy muddy muddy muddy
	0905 0917 6996 0935 0945 0957 1023 1043 1043	25 45 65 85 100 115 145 145 185 205	16.19 16.20 16.12 16.14 16.10 16.19 16.19 16.21 16.21	(0.22 (0.44 (0.52 10.54 10.40 	1.479 1.369 1.296 1.234 1.189 1.089 1.070	71000 71000 71000 71000 71000 71000 71000 71000 71000	0.44 0.41 0.42 0.07 0.19 0.12 0.05 0.40	-31.1 -56.9 -60.7 -82.9 -93.0 -50.2 -41.7 -84.7 -54	76.19 76.12 26.10 26.11 26.27 26.09 26.09 26.00 26.00 26.00 26.00 26.00	muddy
	0905 0917 6996 0935 0945 0957 1023 1043 1043 1141 1151	25 45 45 85 100 115 145 185 205 135	16.19 16.20 16.12 16.14 \6.20 16.19 16.21 16.21 16.21 16.30	10.22 10.44 (0.52 10.57 10.40 9.73 9.73 9.94 9.91 10.08	1.479 1.369 1.296 1.234 1.189 1.039 1.070 1.070 1.049 1.048	71000 71000 71000 71000 71000 71000 71000 71000 71000 71000	0.44 0.41 0.42 0.07 0.19 0.12 0.07 0.05 0.40	-31.1 -56.9 -60.7 -22.9 -93.0 -30.2 -41.3 -71.7 -84.3 -51.6	76.19 76.12 26.10 26.11 26.27 26.09 26.09 26.00 26.00 26.00 26.00 26.00 26.00 26.00	muddy
	0905 0917 6996 0935 0945 0957 1023 1043 1043 1141 1151	25 45 45 85 100 115 145 185 205 135 150 270	16.19 16.20 16.22 16.24 16.20 16.19 16.19 16.21 16.21 16.31 16.31	(0.22 10.44 (0.52 10.54 10.40 9.73 9.73 9.94 9.94 9.91 10.08	1.479 1.369 1.296 1.234 1.189 1.089 1.070 1.070 1.049 1.048 1.046 1.055	71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000	0.44 0.41 0.42 0.07 0.19 0.12 0.05 0.40 1.06 0.48	-31.1 -56.9 -60.7 -82.9 -93.0 -50.2 -41.7 -84.7 -54 -51.6 -51.4	76.19 76.12 26.10 26.11 26.27 26.09 26.05 26.01 26.09 26.09 26.09 26.09 26.09	muddy muddy muddy muddy muddy muddy muddy muddy muddy Slighilly muddy Slighill muddy
	0905 0917 6946 0935 0945 0957 1023 1043 1043 1141 1151	25 45 65 85 100 115 145 185 205 135 250 270 290	16.19 16.20 16.22 16.24 16.20 16.19 16.19 16.21 16.21 16.31 16.34	(0.22 10.44 (0.52 10.55 10.40 	1.479 1.369 1.296 1.234 1.189 1.089 1.070 1.070 1.049 1.048 1.046 1.055 1.043	71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000	0.44 0.41 0.42 0.07 0.19 0.12 0.05 0.40 1.06 0.48	-31.1 -56.9 -60.7 -82.9 -93.0 -30.2 -41.7 -84.7 -54 -51.6 -51.4	76.19 76.12 26.10 26.11 26.27 26.09 26.09 26.00 26	muddy muddy muddy muddy muddy muddy muddy muddy muddy Slightly muddy Slight muddy
	0905 0917 6946 0935 0945 0957 1023 1043 1043 1141 1151 1201 1211 1231	25 45 65 85 100 115 145 185 205 135 150 270 290 310	16.19 16.20 16.22 16.24 16.20 16.19 16.19 16.21 16.21 16.31 16.34 16.40	(0.22 10.44 (0.52 10.54 10.40 9.73 9.73 9.94 9.91 10.08 10.05 10.07	1.479 1.369 1.296 1.234 1.189 1.089 1.070 1.070 1.049 1.049 1.046 1.055 1.043	71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000	0.44 0.41 0.42 0.07 0.19 0.12 0.07 0.05 0.40 1.06 0.48 0.67 0.45	-31.1 -56.9 -60.7 -22.9 -93.0 -50.2 -41.3 -71.7 -84.7 -54 -51.6 -51.6 -51.2	76.19 76.12 26.10 26.11 26.27 26.09 26.05 26.01 26.0	muddy muddy muddy muddy muddy muddy muddy muddy Slighthy muddy Slight muddy Slight muddy Slight muddy
	0905 0917 6946 0935 0945 0957 1023 1043 1043 1141 1151 1201 1211 1231	25 45 65 85 100 115 145 185 205 135 250 270 290 310	16.19 16.20 16.12 16.14 16.20 16.19 16.21 16.21 16.31 16.34 16.40 16.41	(0.22 (0.44) (0.53) 10.54 10.40 9.72 9.72 9.94 9.91 10.08 10.05 10.09 10.09	1.479 1.369 1.296 1.234 1.189 1.089 1.070 1.070 1.049 1.046 1.055 1.040 1.040 1.040	71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000	0.44 0.41 0.42 0.07 0.12 0.05 0.40 1.06 0.48 0.67 0.45	-31.1 -56.9 -60.7 -22.9 -93.0 -50.2 -41.7 -84.7 -54 -51.6 -51.6 -51.2 -54.6	76.19 76.12 26.60 26.11 26.27 26.09 26.05 26.01 26.0	muddy muddy muddy muddy muddy muddy muddy muddy Slighthy muddy Slight muddy Slight muddy Slight muddy Slight muddy
	0905 0917 6996 0935 0945 0957 1023 1043 1043 1141 1151 1211 1231 1295 1255	25 45 65 85 100 115 145 185 205 135 250 270 290 310 335 355	16.19 16.20 16.12 16.14 16.19 16.19 16.21 16.21 16.31 16.34 16.40 16.41	(0.22 (0.44 (0.52 10.54 10.40 9.72 9.72 9.74 9.94 9.91 10.08 10.05 10.05 10.06 10.06 10.04	1.479 1.369 1.296 1.296 1.296 1.089 1.070 1.070 1.049 1.048 1.046 1.055 1.040 1.032 1.040	71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000	0.44 0.41 0.42 0.07 0.19 0.12 0.07 0.05 0.40 1.06 0.98 0.67 0.45 0.65 0.70 0.54	-31.1 -56.9 -60.7 -22.9 -93.0 -50.2 -41.3 -71.7 -54.5 -51.6 -51.6 -51.6 -51.6 -51.6	76.19 76.12 26.10 26.11 26.27 26.09 26.05 26.01 26.0	muddy muddy muddy muddy muddy muddy muddy muddy Slighthy muddy Slight muddy
	0905 0917 6946 0935 0945 0957 1023 1043 1043 1141 1151 1201 1211 1231	25 45 65 85 100 115 145 185 205 135 250 270 290 310	16.19 16.20 16.21 16.19 16.19 16.19 16.21 16.21 16.31 16.34 16.40 16.41	(0.22 10.44 (0.52 10.54 10.40 9.73 9.73 9.94 9.91 10.08 10.09 10.09 10.09 10.09	1.479 1.369 1.296 1.296 1.089 1.070 1.070 1.049 1.049 1.046 1.055 1.040 1.032 1.031	71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000	0.44 0.41 0.42 0.07 0.12 0.05 0.40 1.06 0.48 0.67 0.45	-31.1 -56.9 -60.7 -22.9 -93.0 -50.2 -41.3 -71.7 -54.5 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6	76.19 76.12 26.09 26.09 26.09 26.09 26.09 26.09 26.15 26.01 26.05 26.05 26.05 26.05 26.05 26.05 26.05	muddy muddy muddy muddy muddy muddy muddy muddy Slighthy muddy Slight muddy Slight muddy Slight muddy Slight muddy
	0105 0917 0935 0935 0935 1033 1043 1043 1141 1151 1211 1231 1295 1305 1320 1335	25 45 65 85 100 115 145 185 205 135 250 270 310 335 355 370	16.19 16.20 16.12 16.14 16.19 16.19 16.21 16.21 16.31 16.34 16.40 16.41 16.41 16.41 16.41	(0.22 (0.44 (0.52 10.54 10.40 9.72 9.72 9.74 9.94 9.91 10.08 10.05 10.05 10.06 10.06 10.04	1.479 1.369 1.296 1.296 1.296 1.089 1.070 1.070 1.070 1.078 1.046 1.055 1.047 1.040 1.032 1.031 1.031 1.031	71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000	0.44 0.41 0.42 0.07 0.19 0.12 0.07 0.05 0.40 1.06 0.98 0.67 0.45 0.65 0.54	-31.1 -56.9 -60.7 -82.9 -93.0 -50.2 -41.7 -34.7 -51.6 -51.6 -51.6 -51.2 -51.6 -51.2 -41.7 -41.7 -41.7	76.19 76.12 26.60 26.11 26.27 26.09 26.05 26.01 26.0 26.09 26.05 26.05 26.05 26.05 26.07 26.07 26.09 26.09 26.09	muddy muddy muddy muddy muddy muddy muddy muddy slightly muddy Slight muddy Slight muddy Slight muddy Slight muddy Slight muddy Cloudy Cloudy
	0905 0917 6946 0935 0945 0957 1023 1043 1043 1141 1151 1211 1231 1295 1305 1320	25 45 65 85 100 115 145 185 205 135 150 270 310 335 355 370 380	16.19 16.20 16.21 16.19 16.19 16.19 16.21 16.31 16.34 16.40 16.41 16.41 16.41 16.41 16.42 16.33	(0.22 10.44 (0.52 10.54 10.40 9.73 9.94 9.91 10.08 10.09 10.09 10.09 10.09 10.09 10.09 10.09 10.09 10.09	1.479 1.369 1.296 1.296 1.089 1.070 1.070 1.049 1.049 1.046 1.055 1.040 1.032 1.040 1.032 1.031 1.031 1.030	71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 272 222 182 69.4 61.9	0.44 0.41 0.42 0.07 0.12 0.07 0.05 0.40 1.06 0.45 0.67 0.45 0.55 0.51 0.96 0.87	-31.1 -56.9 -60.7 -82.9 -93.0 -50.2 -41.7 -54.3 -51.4 -51.6 -51.4 -51.2 -51.4 -51.2 -41.7 -41.9 -41.9 -41.2	76.19 76.12 26.60 26.11 26.27 26.09 26.05 26.01 26.05 26.01 26.05 26.05 26.07 26.07 26.07 26.09 26	muddy muddy muddy muddy muddy muddy muddy muddy Slight muddy Slight muddy Slight muddy Slight muddy Slight muddy Cloudy Cloudy Cloudy
	0905 0917 0935 0935 0935 1023 1043 1043 1043 1141 1151 1211 1231 1295 1305 1320 1335 1340 1350	25 45 65 85 100 115 145 145 185 205 135 135 135 230 310 310 310 310 310 310 310 3	16.19 16.20 16.21 16.19 16.19 16.19 16.21 16.31 16.31 16.40 16.41 16.41 16.41 16.41 16.41 16.41 16.41 16.41	(0.22 (0.44) (0.52) (0.54) (0.40) (0.40) (0.40) (0.60)	1.479 1.369 1.296 1.296 1.296 1.089 1.070 1.070 1.049 1.049 1.046 1.055 1.040 1.032 1.031 1.031 1.031 1.030 1.029	71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 272 222 182 69.4 61.9 58.5	0.44 0.41 0.42 0.07 0.19 0.12 0.07 0.05 0.40 1.06 0.48 0.67 0.45 0.55 0.51 0.96 0.51	-31.1 -56.9 -60.7 -82.9 -93.0 -50.2 -41.3 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6 -41.7 -41.9 -41.9 -41.3	76.19 76.12 26.60 26.11 26.27 26.09 26.05 26.01 26.0 26.05 26.05 26.05 26.05 26.05 26.07 26.07 26.07 26.09 26.09 26.09 26.09 26.09 26.05 26.09 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.07 26.07 26.09 26.09 26.09 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.07 26.07 26.07 26.07 26.09 26.	muddy muddy muddy muddy muddy muddy muddy muddy slight muddy slight muddy slight muddy slight muddy cloudy cloudy cloudy cloudy
	0105 0917 0935 0935 0935 1033 1043 1043 1141 1151 1211 1231 1295 1305 1320 1335 1340 1350 1430	25 45 65 85 100 115 145 165 185 205 235 250 270 270 315 355 370 390 390 390 390	16.19 16.20 16.21 16.19 16.19 16.19 16.21 16.31 16.34 16.41 16.41 16.41 16.41 16.41 16.41 16.41 16.41 16.41 16.41	10.22 10.44 (0.52 10.55 10.40 9.72 9.72 10.08 10.05 10.09 10.09 10.09 10.09 10.09 10.09 10.09 10.09 10.09 10.09 10.09	1.479 1.369 1.296 1.296 1.296 1.089 1.070 1.070 1.049 1.040 1.055 1.043 1.040 1.032 1.031 1.031 1.030 1.029 1.028 1.028	71000 71000	0.44 0.41 0.42 0.07 0.12 0.07 0.08 0.40 1.06 0.48 0.67 0.45 0.55 0.51 0.96 0.87	-31.1 -56.9 -60.7 -82.9 -93.0 -50.2 -41.3 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6 -41.7 -41.9 -41.3 -41.3 -58.5	76.19 76.12 26.60 26.11 26.27 26.09 26.05 26.01 26.0 26.05 26.01 26.05 26.05 26.07 26.07 26.07 26.07 26.07 26.07	muddy muddy muddy muddy muddy muddy muddy muddy Slight muddy Slight muddy Slight muddy Slight muddy Slight mud
	0905 0917 0935 0935 0935 1023 1043 1043 1043 1141 1151 1211 1231 1295 1305 1320 1335 1340 1350	25 45 65 85 100 115 145 145 185 205 135 135 135 230 310 310 310 310 310 310 310 3	16.19 16.20 16.21 16.19 16.19 16.21 16.21 16.31 16.34 16.40 16.41 16.41 16.41 16.41 16.41 16.41 16.41 16.41 16.41 16.41 16.41	(0.22 (0.44) (0.52) (0.54) (0.40) (0.40) (0.40) (0.60)	1.479 1.369 1.234 1.189 1.039 1.070 1.070 1.049 1.048 1.046 1.055 1.043 1.040 1.032 1.031 1.031 1.031 1.032 1.031 1.031 1.032	71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 71000 272 222 182 69.4 61.9 58.5	0.44 0.41 0.42 0.07 0.12 0.07 0.08 0.40 1.06 0.48 0.67 0.45 0.55 0.51 0.96 0.87	-31.1 -56.9 -60.7 -82.9 -93.0 -50.2 -41.3 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6 -51.6 -41.7 -41.9 -41.9 -41.3	76.19 76.12 26.60 26.11 26.27 26.09 26.05 26.01 26.0 26.05 26.05 26.05 26.05 26.05 26.07 26.07 26.07 26.09 26.09 26.09 26.09 26.09 26.05 26.09 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.07 26.07 26.09 26.09 26.09 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.05 26.07 26.07 26.07 26.07 26.09 26.	muddy muddy muddy muddy muddy muddy muddy muddy slight muddy slight muddy slight muddy slight muddy cloudy cloudy cloudy cloudy

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Project Ref: Ameren GW Monitor	ing	<u> </u>	roject l	No.: 153-14	06.		_
Location Monitored By: 75	Date [9 15	Time	1480			
Well Piezometer Data (circle one) Depth of Well (from top of PVC or ground)		2.09 TO		feet			
Depth of Water (from top of PVC of ground) Radius of Casing Casing Volume		606 to		feet inches feet cubic feet	1 32	5 gal fi	ion drilling
Development / Purging Disc		,6·3=43.3	}	gallons	3	69 gal	total
Purging Method Start Purging	Date 1//9	terva pump	Time	1419			
Stop Purging	Date [1]/10	0/15	Time	1052			

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Date	Time	Volume Discharge (gals)	Temp (°)	pН	Spec.Cond. (S/cm)	Turbidity (NTU)	Dissolved Oxygen (mg/L)	Redox Potential (+/- mV)	WL (ft BTOC)	Appearance of Water and Comments
11/9/15	1430	30	14.48	8,55	0.632	71000	1.05	-167.7	26,74	Muldy
	1450	80	14.53	7.80	0.599	71000	0.94	-156.4	26.87	Muddy
	1510	125	14.59	7.50	0.533	71000	0.51	-139.5	11.FG	Muddy
	1530	185	4.38	7.39	0.528	71000	0.87	-124.5	27.19	Middle
	1550	220	14.76	7.33	0.526	71000	0.79	-128.5	17.20	cloudy
V	1602	250	14.69	7.35	0 572	71000	0.77	-132.5	26,10	cloudy
11/10/15	0843	350	13.41	6.92	6.566	54.7	1.44	-112 4	26.54	sightly clady
1	0853	380	14.115	6.95	0.579	104.0	0.96	-113.5	26.45	Slightly cloudy
	0903	395	14.22	7.03	0.578	149.0	1.52	一种	a.6.33	Slightly cloudy
	0921	410	13.34	7.11	0.576	186,0	1-32	-127.9	26.26	Slightly cloudy
	0931	415	13.16	7.12	0.579	157.0	0.94	-124.0	26.28	slight cloud
V	0946	400	13.35	118	0.572	96.3	0.91	-129.5	26.23	Skigz4 cloudy
	0956	423	13.47	7.18	0.564	52.4	0.81	-134.0	26.31	Slightly cloudy
	1007	438	13.55	7.19	0.563	38.8	0.74	-134-8	26.30	clear
	1017	435	13.76	719	0.563	21.1	0.90	-131.9	26.29	clear
	1027	440	13.80	7.20	0.562	24.4	0.75	-135,4	26.29	clear
1	1037	445	13.99	7.21	0.564	18.2	0.82	-131-2	26.28	clear
	1041	447	14.12	7.22	0.668	18.0	0.95	-132:0	26.34	-cheur
	1047	450	14.08	7:21	0.566	15.8	0.87	-132.3	26.30	Clear
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Project Ref: Ameren GW Monitoring	Project No.: 153-1406.
Location MW-5 Monitored By: Date	[[[] 0] 15 Time [1140
Well Piezometer Data	
(circle one) Depth of Well (from top of PVC or ground)	61.56 TOC feet
Depth of Water (from top of PVC)or ground)	23,01 TOC feet
Radius of Casing	inches feet
Casing Volume	cubic feet 9.9 Jal - 3: 30 Jal gallons 180 gal tom dvilling
Development / Purging Discharg	
Purging Method	Waterra Prop
Start Purging Date	11 10 15 Time 1143
Stop Purging Date	1(1,0(S) Time 1330
Monitoring	<u> </u>
Date Time Volume Discharge (gals) Temp pH	Spec.Cond. (_S/cm) Turbidity (NTU) Dissolved Oxygen (NTU) Dissolved Oxygen (NTU) Potential (+/- mV) WL (ft BTOC) Appearance of Water and Comments

	ate	Time	Volume Discharge (gals)	Temp	рН	Spec.Cond. (S/cm)	Turbidity (NTU)	Dissolved Oxygen (mg/L)	Redox Potential (+/- mV)	WL (ft BTOC)	Appearance of Water and Comments
11/	10/15	1152	25	14.21	7.41	0.634	71000	0.41	-152.4	13.34	Very modely
7		1212	60	14.26	7.42	0.604	71000	0.60	-146.8	24.27	Modely 1
		1232	85	14.27	7.33	0.595	71000	0.71	-143.3	24.18	Muddy 1
	16	1252	-	_	19 3811	-		1		7.04	amplified to a control of the contro
		1256	130	14.27	7.28	0.598	47.2	0.75	-137.6	23.54	cloudy (slight)
	1.00	1306	140	14.32	7.26	0.601	8.92	1.01	-137.8	23.55	clear
L	V	1316	170	14.31	7.26	0.598	6.62	1.03	-135.3	23.96	clear *
	- 1	1321	180	14.30	7.25	0.598	5.35	0.72	-135.7	23.60	CRAV
\vdash		1326	190	14.30	7.23	0.595	6.26	0.69	-135.0	23.64	clear
\vdash					1000						
\vdash					3 (-				
\vdash											
\vdash											
\vdash											
\vdash											
						7					
									-		



Project Ref: Ameren GW Monitorin	g Projec	t No.: 153-1406.
Location Mw-6		
Monitored By: 13	ate 115/2015 Time	1320
Well Piezometer Data (circle one) Depth of Well (from top of PVC or ground) Depth of Water (from top of PVC or ground) Radius of Casing	61.47 tol 34.96 TOC	feet feet inches
Casing Volume	6,82·3-20.5	gallons 140 gal from dilling
Development / Purging Discha	arge Data	
Purging Method	WATTER PUM	
Start Purging	Pate (1/5//5 Time	1416
Stop Purging	Pate 11 5 5 Time	1635
Monitoring		

Date	Time	Volume Discharge (gals)	Temp (°)	рН	Spec.Cond. (S/cm)	Turbidity (NTU)	Dissolved Oxygen (mg/L)	Redox Potential (+/- mV)	WL (ft BTOC)	Appearance of Water and Comments
11/5/15	1440	3	15.22	7.62	0.584	71000	6.87	184.8	35.29	modely
1	1500	30	14.23	7.53	0-592	7/000	3.81	1474	35.26	mudda.
1 1	1515	60	13-85	7.85	0-581	71000	2.58	16.7	35.26	/ muddy
1 1	1530	85	13.96	817	0.583	850	4.85	99.2		Very Clouds
1.3	1545	105	14.10	8.24	0.573	276	2.64	99.0	35-27	clade
1.1	1600	115	14.08	8.15	0.576	100	1.58	18.2	35.30	Cloudy
1.2	1615	135	14.12	8.01	0.375	76.9	3-60	70.7	35.31	slight cloudy
-	1620	145	1425	7.89	0.579	63-8	3.52	68.5	35.30	stiret cloud
\vdash	1425	150	14.13	7.80	0.579	63.5	3.65	69.1	35-25	Slight rised
	1670	155	14.25	7.69	0.579	SOR	3.60	69.4	35.31	SITGL+ Coco or
\vdash						7 1 2				
\vdash	-					1 1 1 1 1 1 1			10 Cg	
\vdash			 			7 (0.7 (0.00)	1000			
\vdash	-					11/2 1/2 1	TO See	100/4		
1			_							
	-						200		-	
							100			
								34 6		
							200			7/17/19
									CON.	
							3	3.50		A STATE OF THE STA
							100			The state of the s
							THE REAL PROPERTY.			
				10.0						15 May 15 May 17 May 18
					7.5			>		H i
					.7					



Project	Ref: A	meren GW	/ Monito	ring	Project No.: 153-1406.						
Locat i Monitore		MM-	7	Date	11/6/15		Time	1300			
Well F	Piezom	eter Data			- (
•••	••	(circle one)									
Depth of Well (from top of PVC)or ground)					100.0		0(
Depth of Water (from top of PVC or ground)					41.09 TOC feet						
Radius of Casing					2 in inches						
Casing Volume					feet 400 gal from deilling cubic feet 13.78.3=41.4 gal total						
Development / Purging Discharge Data											
Purging N	Method				Water	ra pi	gmi				
Start Purging Date					11/6/2	015	Time	133	2		
Stop Purg	ging			Date	11/6/20	15	Time	1655			
Monitorin	9				•						
Date	Time	Volume Discharge (gals)	Temp (°)	рН	Spec.Cond. (_S/cm)	Turbidity (NTU)	Dissolved Oxygen (mg/L)	Redox Potential (+/- mV)	WL (ft BTOC)	Appearance of Water and Comments	
116/15	1350	50	16.54	1.77	1.323	71000	2.04	-125.9	41.75	Very middy	
17	1410	1/0	16.50	7.78	1-114	71000	2.38	-115.0	41.72	Very widdy	
	430	145	16.36	7.18	1.006	76000	207	-116.5	41.74	moddy	
	1450	185	16.45	7.81	0.919	71000	1.30	-122.8	41.70	Cloudy	
	1510	235	16.44	776	D. RLI	33.8	1.53	-124.4	41.73	Stylly clowds	
	1530	250	-	-	-	-		-	-	Dung plage water	
	1550	290	16.34	7.90	0.714	9.57	126	-131.9	41.73	Clear	
	1610	350	16.22	7.84	07154	9.64	1.50	- 1 35,3	41.70	Clear	
\vdash	1613	370	16.55	7.69	0.750	860	1.43	-135.8	41.68	Clear	
-	1621	380	16.60	7,61	0.741	9.88	1.42 -	138.9	41.73	Clear	
	1630	390	16-58	7.56	0.732	8,60	1.34	-137.9	41.74	clear	
\vdash	1635	410	16.62	7.68	0.724	9.10	1.16	-142.4	41.74	cleav	
	1640	425	16.47	7.65	0.726	7.80	0.98	-145-5	41.74	claw	
-	1655	445	16-38	7.59	0.726	8.12	1.01	-146.2	41.71	clear	
- 1							4 - 1	1 100			
	-			-				-			
<u> </u>	-		-	-		-	-	+			
—	 					 		 			



Golder Associates WELL DEVELOPMENT/PURGING FORM

Project	Ref: A	meren GW	/ Monito	ring			Project I	No.: 153-	1406.	
Locat		MW-BI					1			
Monitore	ed By:	13		Date	11/6/15		Time	0725		
Well F	Piezom	eter Data	ì							
Depth of Well (from top of PVC or ground)					102.03 TUC			feet		
Depth of Water (from top of PVC or ground)					45.63 +0(feet		
Radius of Casing					214			inches		
								feet		
Casing V	olume							cubic feet 450 gal from duiling		
					13.3 . 3 = 40			gallons		
Devel	onman	t / Purgii	na Die	charae	n Data				4	90 gal total
Purging N	-	t / Fulgii	ig Disc	onar g						1
				Dete	Waterra pimp			0011		The state of the s
Start Purging Date					11/6/15 Time				0800	
Stop Pur	ging			Date	11 6/15		Time	1245		
Monitorin	g									
						1				
Date	Time	Volume Discharge	Temp	pН	Spec.Cond.	Turbidity	Dissolved Oxygen	Redox Potential	WL (ft	Appearance of Water and Comments
54.6		(gals)	(°)	F	(S/cm)	(NTU)	(mg/L)	(+/- mV)	BTOC)	
11/6/15	3840	FO	15.22	7.71	1,443	71000	1.28	-41.5	45.77	muddy
	0900	105	15.57	7.55	1:460	71000	0.33	-106.0	45-74	muddy
	0920	145	15.67	7.34	1.437	7/000	1.30	-116.1	45.66	Very cloudy
-	0940	165	15.57	7.36	1.435	71000	1.55	-1983	4575	wear cloudy
-	1000	175	15.77	7.57	1.415	71600	0.90	-121.1	45.69	Very cloudy
1	1040	235	15.71	7.34	1.408	7/000	0.98	-/07.4	45.63	Very cloudy
	1100	270	15.80	7.41	1.380	HOOD	2.38	104	45.76	Dump Water
+	1120	310	15.72	7.44	1.385	71000	1.47	-113.3	45.65	cloudy
	1140	350	15.74	7.29	1.401	71000	0.66	-123.9	95.60	Madda
*	1200	380	15,64	7.13	1.381	NO. 6	1.75	-109.8	45.65	Cloudy
	1220	440	15.76	7.04	1.367	8.76	172	-111.3	45.55	clear
	1225	460	15.72	6.97	1.366	3.77	1.62	-110, 2	45.58	clear
	1230	470	15.75	6.96	1.365	4.91	1.51	-114.4	45.55	clear
1	1235	480	15.76	6.96	1.364	4.65	1.35	-114.6	45.54	clear
	1240	490	15.75	6.90	1.364	3.83	1130	-116,0	45.54	
				15				1		
- 1										
	-		-							
-	+			-		-		-		
-	+	-	-		-	-		-		
-	+		-	-		-		+		
-	-				-	-		-		
	1	-	 	—		+		1		
-			-	1		1	1			

block



Project Ref:	Ameren GW Monitoring	Project No.: 153-1406. 00
Location	10 MU-BR	
Monitored Ry	75/767 Data 11/21	15° 24.13

Well Piezometer Data

(circle one) Depth of Well (from top of PVO or ground) Depth of Water (from top of PVC or ground) Radius of Casing

Casing Volume

89.80 TUL	feet	-,
32.54 106	feet	
Q. D	inches	
	feet	40
	cubic feet	+ 250 Sull DITLE
13.5 x3 = 405	galions	1 20 341 0110
		= 290 Jullas

Development / Purging Discharge Data

Purging Method Start Purging Stop Purging

Date Date

0934 Time Time

Monitoring

ite Time	Volume Discharge (gals)	Temp	pН	Spec.Cond.	Turbidity (NTU)	Dissolved Oxygen (mg/L)	Redox Potential (+/- mV)	WL (ft BTOC)	Appearance of Water and Comments
115 094	70	14.50	7.70	1.031	7/004	1.75	-51.6	32.74	mus -
095	3 40	14.40	7,69	0.094	71000	0.44	-84.6	32.70	
095	(10	14.34	7.69	0.754	71000	6.33	-114.0	32.41	muldy
1010	80	14.41	7.25	0.913	71000	-	-91.3	32.70	muddi
1010	100	14.31	7.35	0.881	71000	0.60	-122.7	32.65	muddly
1931	110	14.35	7.25	0.874	71600	0.64	-1152	32,14	1
103	7 140	14.31	2.21	0,852	71200	0.73	-106.6	32,60	
104	7 160	14,30	7.32	S880 .	567	1.04	-115.7	32.45	Slight Cloub
1056	180	14.79	7.27	0.816	71000	0.66	-/22.6	32.68	stightly (loudy
1106	200	14.33	7.31	0.793	71000	0.75	-119.1	32.62	Slightly (loudy
1111	240	14.35	7.27	0.807	71000	0.40	-126.1	32.47	Slight. Icloudy
1120	760	14.42	7.34	0.804	71900	1.71	-1706	30.71	slight cloudy
1148	280	14.46	7.29	0.798	71600	0.84	-124.4	32.74	Slight cloude
1157	300	14.49	7.28	0.793	71000	0.88	-115.3	32.50	Stight cloud/Emit P
1243	320	15.67	7.46	0.784	604	1.44	-129.0	32.71	moddy
1252	310	14.84	7.39	0.787	40.4	11.81	-124.4	32.70	clear
1304	360	14.88	7.99	0.765	13.3	1.45	-126.2	32.66	clear
1317	380	15.20	7.38	0.784	8.41	1.19	-1179	32.40	elequ
1330		12:12	7:39	0.775	221	1.09	-114.1	32.65	Slisty cludy I more pury)
1340		14.13	7.54	0.782	522	1010	-115.3	32.68	II .
352	440	14.73	7.36	0.779	307	1.19	-1(40)	32.34	BACK to Bother Of sun
140	7. 74	14.77	7.31	0.774	203	0-79	-1227	32.63	Cloudy
1414	1790	14.78	7,39	0.777	218	2.03	-121.5	32.47	SList Clark
1422		14.62	7.36	0.773	165	0.99	-122-4	32.49	Slight clouds
1432	520	14.82	1.33	0.774	155	0.75	-119.8	32.59	sight cloudy/stur- D
150		14.64		0.775	131	0.81	-121.6	32.58	slight eloudy
1131	8 5HO 5 550	14.51	7.26	0.771	19	0.85	-120.0	32.44	The clear

clear 0.768

APPENDIX G CCR MDNR Well Certification Forms

MISSOURI DEPARTMEN		REF NO		DAT	DATE RECEIVED					
NATURAL RESOURCES		00512528 CR NO CHECK NO.			CK NO	12/23/2015				
DIVISION OF		CK NO		CITE	OK NO.		17006	5		
GEOLOGY AND LAND S	URVEY	STATE WEL	L NO	-		REVENUE NO.				
(573) 368-2165		A206103	01/04/2016			122315				
MONITORING WELL		ENTERED N			APPROVED B	Y		ROUTE		
CERTIFICATION RECORD		PH1 PH	2 PH3 12/28/2015 12/28/2015							
INFORMATION SUPPLIED BY PRIMARY CON										
NOTE: THIS FORM IS NOT TO BE USED FOR NESTED WELLS	TRACTOR OR	DRILLING	CONTRACTOR							
OWNER NAME AMEREN MISSOURI	CONTACT NAME BILL KUTOSKY							VARIANCE GRANTED BY DNR		
OWNER ADDRESS 3700 S LINDBERGH BLVD	CITY ST LOUIS			STA	TE	ZIP 6312	27	NUMBER		
SITE NAME AMEREN MISSOURI	<u> </u>	WELL NUMBER MW-1						COUNTY JEFFERSON		
SITE ADDRESS RUSH INLAND ENERGY CENTER 100 BIG HOLLOW ROAD				CITY				STATIC WATER LEVEL 28.9 FT		
SURFACE COMPLETION				-						
TYPE LENGTH AND DIAMETER OF SURFACE COMPLETION	DIAMETER AND DI SURFACE COMPLI		HOLE SURFACE CO	MPLET	ION GROUT	LOCATIO	N OF WEL	L		
X ABOVE GROUND LENGTH 5.0 FT.	PLACED DIAMETER 12.0	IN	X CONCRET	TE .		LAT	38 °	7' 39 47"		
FLUSH MOUNT DIAMETER 4.0 IN.	LENGTH 2.5 FT.		OTHER				90 °			
						SMAI	LEST	LARGEST		
LOCKING CAP			SURFACE COMPL	ETTIC	.N		1/4	1/4NE_ 1/4		
WEEP HOLE		\rightarrow		LUMINUM		SEC		TWN39 NORTH		
WEEF HOLE	1					RANGE		Direction E		
	- 11	11					RING FOR:	-		
						RADIONU EXPLOSI		PETROLEUM PRODUCTS ONLY METALS VOC		
	- 11		RISER			svocs	VES	PESTICIDES/HERBICIDESS		
ELEVATIONFT.			RISER PIPE DIAME	TER	2.0IN.					
ANNUL AR OFAL			RISER PIPE LENGT				ED USE O			
ANNULAR SEAL LENGTH59,0FT.			HOLE DIAMETER WEIGHT OR SDR#				CTION WELL	OPEN HOLE		
			WEIGHT OR OBK#		001140	PIEZON				
SLURRY CHIPS PELLETS GRANULAR	4 1		MATERIAL			DIRECT	PUSH			
CEMENT/SLURRY	3 1	11	STEEL	X THEF	RMOPLASTIC (PVC)	DEF	PTH	FORMATION		
IF CEMENT/BENTONITE MIX:			OTHER			FROM	ТО	DESCRIPTION		
BAGS OF CEMENT USED:			_			0.0	6.0	SLTY CLY		
%OF BENTONITE USED:						6.0	13.5	SLTY CLY		
WATER USED/BAG: GAL.	L. L.		DENITONITE OF AL			13.5	24.5	SND		
			BENTONITE SEAL LENGTH: 6.0			24.5 30.0	30.0 32.4	SND SND		
			X CHIPS PELL	LETS	GRANULAR	32.4	36.5	SND		
			SLURRY			36.5	38.8	SLTY CLY		
			SATURATED ZONE		HYDRATED	38.8	40.0	SND		
SECONDARY FILTER PACK LENGTH: 0.0FT.	4 11					40.0 60.0	60.0 70.0	SND SND		
LLNGIII. <u>0.0</u> FI.			SCREEN			70.0	80.0	SND		
	-		SCREEN DIAMETE			80.0	85.0	SND		
	-		SCREEN LENGTH							
DEPTH TO TOP OF PRIMARY		All	DIAMETER OF DR DEPTH TO TOP							
FILTER PACK:71.0FT.		e ithere synapher itemini] 22: 11: 10: 10! _		<u> </u>					

FOR CASED WELLS, SUBMIT ADDITIONAL AS BUILT DIAGRAMS SHOWING WELL CONSTRUCTION DETAILS INCLUDING TYPE AND SIZE OF ALL CASING, HOLE DIAMETER AND GROUT USED.

SIGNATURE (PRIMARY COUNTRACTOR)

YEARING NOBIES

DATE WELL DRILLING WAS COMPLETED

1/10/1/2015

DEPARTMENT OF NATURAL RESOURCES REQUIREMENTS FOR THE CONSTRUCTION OF MONITORING WELLS

SIGNATURE (WELL DRILLER)

Y JASON DRABEK

PERMIT NUMBER

0/04484

SIGNATURE (APPRENTICE)

APPRENTICE PERMIT NUMBER

LENGTH OF PRIMARY FILTER

PACK: _____14.0FT.

SCREEN MATERIAL

OTHER

/ \	URI DEPARTMEN		REF NO		DATE RECEIVED					
	AL RESOURCES		CR NO	512529	CHE	CK NO.		12/23/20	015	
DIVISIO		LIDVEV	on Editio				170065			
	OGY AND LAND S	URVEY	STATE WELL NO				REVENUE NO.			
MONITORING WEL	68-2165 •		A206104 01/04/2016				122315			
CERTIFICATION R			ENTERED NRSMITK4 APPROV PH1 PH2 PH3			APPROVED B	Y		ROUTE	
CENTILICATION	LOOKD		12/28/2015 12/28/							
INFORMATION SUPPLII		TRACTOR OR	DRILLING CO	NTRACTOR				'		
OWNER NAME AMEREN MISSOURI		CONTACT NAME BILL KUTOSKY							VARIANCE GRANTED BY DNR	
OWNER ADDRESS 3700 S LINDBERGH BLVD					STA MO	TE	ZIP 6312	27	NUMBER	
SITE NAME AMEREN MISSOURI		<u>I</u>			WEL MW-	L NUMBER			COUNTY JEFFERSON	
SITE ADDRESS RUSH INLAND ENERGY CENTE	ER 100 BIG HOLLOW ROAD				CITY				STATIC WATER LEVEL 27.0 FT	
	NGTH AND DIAMETER OF IRFACE COMPLETION	DIAMETER AND DE		SURFACE COI	MPLET	TION GROUT	LOCATIO	N OF WEL	L	
X ABOVE GROUND LET	NGTH <u>5.0</u> FT.	PLACED DIAMETER 12.0	IN.	X CONCRET	E		LAT.	38 °	7' 26.23"	
FLUSH MOUNT DIA				90°	<u>15</u> ' <u>21.11</u> "					
							_	LEST	LARGEST	
LOCKING CAP				SURFACE COMPL	ETTIC	N		1/4	1/4NW 1/4	
WEEP HOLE		1	\neg	STEEL X AL	LUMINUM	PLASTIC	SEC	9 -	TWN. <u>39</u> NORTH	
		I I F					RANGE	7	Direction <u>E</u>	
							MONITOF RADIONL	RING FOR:	PETROLEUM PRODUCTS ONLY	
							EXPLOSI	_	METALS VOC	
ELEVATIONI	ET	F 14	11	RISER PIPE DIAME	TED	2 010	svocs	L	PESTICIDES/HERBICIDESS	
ELEVATION	rı.			RISER PIPE LENGT			PROPOS	ED USE OI	F WELL	
ANNULAR SEAL				HOLE DIAMETER				GRATION WELL		
LENGTH59.0FT	Т.			WEIGHT OR SDR#		SCH40		CTION WELL	OPEN HOLE	
SLURRY CHIPS							DIRECT			
PELLETS GRANULI CEMENT/SLURRY	AR	7 11		MATERIAL	Y THE	RMOPLASTIC (PVC)	DEF	тн	FORMATION	
IF CEMENT/BENTONITE	E MIX:			OTHER		, ,	FROM	то	DESCRIPTION	
BAGS OF CEMENT USE	D:						0.0	6.7	SLTY CLY	
%OF BENTONITE USED) :						6.7	21.3	SND	
WATER USED/BAG: GA	AL.						21.3	22.6	SND	
				BENTONITE SEAL			22.6		SND	
				LENGTH:6.0	.ETS	GRANULAR	25.3 28.1	28.1 29.1	SND CLY SND	
				SLURRY			29.1		SND	
				SATURATED ZONE		HYDRATED	36.9	40.0	SLTY CLY	
SECONDARY FILTER PA			111				40.0	85.0	SND	
LENGTH: <u>0.0</u> F	T.			SCREEN						
				SCREEN DIAMETE						
				SCREEN LENGTH:						
DEPTH TO TOP OF PRIM			And I	DIAMETER OF DRI						
FILTER PACK:	<u>72.0</u> FT.		22	DEFIN 10 10P	/	<u>J.U</u> F1.				

FOR CASED WELLS, SUBMIT ADDITIONAL AS BUILT DIAGRAMS SHOWING WELL CONSTRUCTION DETAILS INCLUDING TYPE AND SIZE OF ALL CASING, HOLE DIAMETER AND GROUT USED.

SIGNATURE (PRIMARY COUNTRACTOR)

X JEFFREY INGRAM

PERMIT NUMBER

006124

I HEREBY CERTIFY THAT THE MONITORING WELL HEREIN DESCRIBED WAS CONSTRUCTED IN ACCORDANCE WITH MISSOURI
DEPARTMENT OF NATURAL RESOURCES REQUIREMENTS FOR THE CONSTRUCTION OF MONITORING WELLS

SIGNATURE (WELL DRILLER)

X JASON DRABEK

PERMIT NUMBER

004484

PERMIT NUMBER

004484

TOTAL DEPTH: ___85.0 FEET

DATE WELL CASING, HOLE DIAMETER AND GROUT USED.

DATE WELL DRILLING WAS COMPLETED

10/31/2015

PUMP INSTALLED

PUMP INSTALLED

APPRENTICE PERMIT NUMBER

004484

LENGTH OF PRIMARY FILTER

PACK: _____13.0FT.

SCREEN MATERIAL

STEEL X

OTHER

MISSOURI DEPARTMEN	-	REF NO		DAT	E RECEIVED					
NATURAL RESOURCES		CD NO	00512530	CUE	CK NO	12/23/2015				
DIVISION OF		CR NO		CHE	CK NO.		17006	5		
🛮 🧸 🛞 🛮 GEOLOGY AND LAND S	URVEY	STATE WELL NO				REVENUE NO.				
(573) 368-2165		A206105	01/04/2016					122315		
MONITORING WELL		ENTERED N	IRSMITK4		APPROVED B	Y		ROUTE		
CERTIFICATION RECORD		PH1 PH								
			12/28/2015 12/28/2015							
INFORMATION SUPPLIED BY PRIMARY CONNOTE: THIS FORM IS NOT TO BE USED FOR NESTED WELLS	NTRACTOR OR	DRILLING	CONTRACTOR							
OWNER NAME AMEREN MISSOURI	CONTACT NAME BILL KUTOSKY						VARIANCE GRANTED DNR			
OWNER ADDRESS 3700 S LINDBERGH BLVD	CITY ST LOUIS			STA MO	TE	ZIP 6312	27	NUMBER		
SITE NAME AMEREN MISSOURI		WELL NUMBER MW-3						COUNTY JEFFERSON		
SITE ADDRESS RUSH INLAND ENERGY CENTER 100 BIG HOLLOW ROAD				CITY				STATIC WATER LEVEL 26.0 FT		
SURFACE COMPLETION										
TYPE LENGTH AND DIAMETER OF SURFACE COMPLETION	DIAMETER AND DI SURFACE COMPLI		HOLE SURFACE COI	MPLET	ION GROUT	LOCATIO	N OF WEL	L		
X ABOVE GROUND LENGTH _5.0 FT.	PLACED DIAMETER 12.0		X CONCRET	_		LAT	38 °	7' 10 10"		
FLUSH MOUNT DIAMETER 4.0 IN.	LENGTH _2.5 FT.	IIV.	OTHER							
							LEST	LARGEST		
							1/4	1/4 <u>NW</u> 1/4		
LOCKING CAP			SURFACE COMPL							
WEEP HOLE	1	- I	STEEL X A	LUMINUM	PLASTIC			TWN. 39 NORTH		
	- 11	11	_			RANGE	RING FOR:	Direction <u>E</u>		
						RADIONL		PETROLEUM PRODUCTS ONLY		
			Г			EXPLOSI SVOCS	VES	METALS VOC PESTICIDES/HERBICIDESS		
ELEVATIONFT.	F	11	RISER RISER PIPE DIAME	TER	2 0IN	SVOCS		PESTICIDES/RERBICIDESS		
LLEVATIONTT.			RISER PIPE LENGT			PROPOS	ED USE O	F WELL		
ANNULAR SEAL			HOLE DIAMETER				GRATION WELL			
LENGTH59.0FT.		1	WEIGHT OR SDR#		SCH40	EXTRAC	CTION WELL	OPEN HOLE		
SLURRY CHIPS						PIEZON DIRECT				
PELLETS GRANULAR	4		MATERIAL	_						
CEMENT/SLURRY IF CEMENT/BENTONITE MIX:			STEEL	X THEF	RMOPLASTIC (PVC)	DEF		FORMATION		
			OTHER			FROM	ТО	DESCRIPTION		
BAGS OF CEMENT USED:			_			0.0	6.5	SLTY CLY		
%OF BENTONITE USED:						6.5	11.7	SLT SLTV SLV		
WATER USED/BAG: GAL.			BENTONITE SEAL			11.7 12.4		SLTY CLY SLT		
			LENGTH: 4.0			15.0		CLY SLT		
			X CHIPS PELL	ETS.	GRANULAR	18.3	19.6	SLTY CLY		
			SLURRY			19.6	20.0	SLT		
		*******	SATURATED ZONE		HYDRATED	20.0		SLTY CLY		
SECONDARY FILTER PACK LENGTH: 0.0FT.	4 11					21.3	27.3	CLY SLT		
LENGIA: <u>U.U</u> FI.			SCREEN			27.3 29.5	29.5 80.0	CLY SND		
			SCREEN DIAMETE			23.0	33.0	*··=		
			SCREEN LENGTH							
DEPTH TO TOP OF PRIMARY		Anna de la companya d	DIAMETER OF DR DEPTH TO TOP							
FILTER PACK: <u>66.0</u> FT.		- 100 m	DEPTH TO TOP	/	<u>v.u</u> r I .					

FOR CASED WELLS, SUBMIT ADDITIONAL AS BUILT DIAGRAMS SHOWING WELL CONSTRUCTION DETAILS INCLUDING TYPE AND SIZE OF ALL CASING, HOLE DIAMETER AND GROUT USED.

SIGNATURE (PRIMARY COUNTRACTOR)
x JEFFREY INGRAM

PERMIT NUMBER
006124

I HEREBY CERTIFY THAT THE MONITORING WELL HEREIN DESCRIBED WAS CONSTRUCTED IN ACCORDANCE WITH MISSOURI
DEPARTMENT OF NATURAL RESOURCES REQUIREMENTS FOR THE CONSTRUCTION OF MONITORING WELLS

SIGNATURE (WELL DRILLER)
x JASON DRABEK

PERMIT NUMBER
004484

PERMIT NUMBER
004484

ROUTE AND SIZE OF ALL CASING, HOLE DIAMETER AND GROUT USED.

BOTH WELL DRILLING WAS COMPLETED
10/31/2015

PUMP INSTALLED

APPRENTICE PERMIT NUMBER
004484

LENGTH OF PRIMARY FILTER

PACK: _____14.0FT.

SCREEN MATERIAL

OTHER

/ \	OURI DEPARTMEN	_	REF NO		DAT	E RECEIVED				
	JRAL RESOURCES			0512531	CLIE	CK NO	12/23/2015			
	SION OF		CR NO CHECK NO.				170065			
	LOGY AND LAND S	URVEY	STATE WELL NO				REVENUE NO.			
	368-2165		A206106 0	1/04/2016				122315		
MONITORING W			ENTERED NRSM			APPROVED B	Y		ROUTE	
CERTIFICATION	RECORD		PH1 PH2 12/28/2015 12/28	PH3 /2015 12/28/2015						
INIFORMATION SLIDI	PLIED BY PRIMARY CON	ATPACTOR OR								
NOTE: THIS FORM IS NOT TO BE USED		TINACTOR OR	DIVILLING CC	MINACION						
OWNER NAME AMEREN MISSOURI		CONTACT NAME BILL KUTOSKY							VARIANCE GRANTED BY DNR	
OWNER ADDRESS 3700 S LINDBERGH BLVD		CITY ST LOUIS			STA MO	TE	ZIP 6312	27	NUMBER	
SITE NAME AMEREN MISSOURI					WEL MW	L NUMBER -4			COUNTY JEFFERSON	
SITE ADDRESS RUSH INLAND ENERGY CE	ENTER 100 BIG HOLLOW ROAD				CITY				STATIC WATER LEVEL 26.1 FT	
SURFACE COMPLETION TYPE	LENGTH AND DIAMETER OF SURFACE COMPLETION	DIAMETER AND DE SURFACE COMPLE PLACED		E SURFACE CO	MPLE ⁻	TION GROUT	LOCATIO	N OF WEL	L	
X ABOVE GROUND	LENGTH <u>5.0</u> FT.	DIAMETER 12.0	IN.	X CONCRET	ſΕ			<u>38</u> °		
FLUSH MOUNT	DIAMETER <u>4.0</u> IN.	LENGTH <u>2.5</u> FT.		OTHER				90°		
								LLEST	LARGEST 1/4 SE 1/4	
LOCKING CAP				SURFACE COMPL	ETTIC	ON		1/4	1/4 <u>3L</u> 1/4	
WEEP HOLE		1-	= 1 $-$	STEEL X A	LUMINUN	PLASTIC	SEC	4 7	TWN. <u>39</u> NORTH	
							RANGE		Direction <u>E</u>	
							RADIONI	RING FOR:	PETROLEUM PRODUCTS ONLY	
				r			EXPLOSI		METALS VOC	
ELEVATION	ET	F	11	RISER RISER PIPE DIAME	TED	2 0101	SVOCS		PESTICIDES/HERBICIDESS	
LLLVATION				RISER PIPE LENGT			PROPOS	ED USE OF	WELL	
ANNULAR SEAL				HOLE DIAMETER			GAS MI	GRATION WELL	X OBSERVATION	
LENGTH69	<u>9.0</u> FT.		-	WEIGHT OR SDR#		SCH40		CTION WELL	OPEN HOLE	
SLURRY	IIPS						PIEZON DIRECT			
PELLETS GR CEMENT/SLURRY	RANULAR	-		MATERIAL STEEL	V TUE	RMOPLASTIC (PVC)	55	··	FORMATION	
IF CEMENT/BENTOI	NITE MIX:			OTHER	X THE	(NOFEASTIC (FVC)	FROM	TO TO	FORMATION DESCRIPTION	
BAGS OF CEMENT	USED:			L U						
%OF BENTONITE U		1 1 1					0.0 5.0		SLTY CLY SLTY SND	
WATER USED/BAG:			11				14.0		SLTY CLY	
				BENTONITE SEAL			29.6	43.0	SND	
				LENGTH: 5.0		П	43.0		SLTY CLY SND	
				X CHIPS PELL	LETS	GRANULAR	73.8 78.1		CLY SND SND	
		_		SATURATED ZONE		HYDRATED	82.0		SND	
SECONDARY FILTE		1 - 1								
LENGTH:	<u>0.0</u> FT.			SCREEN						
			1111	SCREEN DIAMETE	ER:	2.0IN.				
				SCREEN LENGTH						
DEPTH TO TOP OF	PRIMARY			DIAMETER OF DR						
FILTER PACK:	<u>77.0</u> FT.		TO SEA	DEPTH TO TOP _	8	<u>80.0</u> FT.				

FOR CASED WELLS, SUBMIT ADDITIONAL AS BUILT DIAGEMS SHOWING WELL CONSTRUCTION DETAILS INCLUDING TYPE AND SIZE OF ALL CASING, HOLE DIAMETER AND GROUT USED.

SIGNATURE (PRIMARY COUNTRACTOR)

x JEFFREY INGRAM

PERMIT NUMBER
006124

I HEREBY CERTIFY THAT THE MONITORING WELL HEREIN DESCRIBED WAS CONSTRUCTED IN ACCORDANCE WITH MISSOURI
DEPARTMENT OF NATURAL RESOURCES REQUIREMENTS FOR THE CONSTRUCTION OF MONITORING WELLS

SIGNATURE (WELL DRILLER)

x JASON DRABEK

PERMIT NUMBER
004484

PERMIT NUMBER
004484

APPRENTICE PERMIT NUMBER
PERMIT NUMBER
004484

LENGTH OF PRIMARY FILTER

PACK: _____13.0FT.

SCREEN MATERIAL

OTHER

X THERMOPLASTIC (PVC)

TOTAL DEPTH:

_90.0 FEET

/ \ \	SOURI DEPARTMEN		REF NO		DAT	E RECEIVED					
	JRAL RESOURCES			0512532			12/23/2015				
	SION OF		CR NO CHECK NO.					170065			
🚅 🛞 GEO	LOGY AND LAND S	URVEY	STATE WELL NO				REVENUE NO.				
(573)	368-2165		A206107 01/04/2016				122315				
MONITORING W	ELL		ENTERED NRSI	/ITK4		APPROVED B	Y	ROUTE			
CERTIFICATION	RECORD		PH1 PH2	PH3							
			12/28/2015 12/2	3/2015 12/28/2015							
INFORMATION SUPI	PLIED BY PRIMARY CON FOR NESTED WELLS	NTRACTOR OR	DRILLING CO	ONTRACTOR							
OWNER NAME AMEREN MISSOURI		CONTACT NAME BILL KUTOSKY							VARIANCE GRANTED BY DNR		
OWNER ADDRESS 3700 S LINDBERGH BLVD				STA MO	TE	ZIP 6312	27	NUMBER			
SITE NAME AMEREN MISSOURI		<u> </u>			WEI	L NUMBER -5			COUNTY JEFFERSON		
SITE ADDRESS RUSH INLAND ENERGY CE	ENTER 100 BIG HOLLOW ROAD				CIT	/ TUS			STATIC WATER LEVEL 23.0 FT		
SURFACE COMPLETION TYPE X ABOVE GROUND	LENGTH AND DIAMETER OF SURFACE COMPLETION LENGTH <u>5.0</u> FT.	DIAMETER AND DI SURFACE COMPLI PLACED DIAMETER 12.0	ETION WAS	LE SURFACE CO		TION GROUT		N OF WEL			
FLUSH MOUNT	DIAMETER <u>4.0</u> IN.	LENGTH <u>2.5</u> FT.		OTHER			LONG	90 °	<u>15' 27.01"</u>		
								LEST	LARGEST		
LOCKING CAP		_		SURFACE COMP	I FTTIC)N	_	1/4	1/4 SE 1/4		
WEEP HOLE		4			ALUMINUN		SEC	4	TWN39 NORTH		
WEET HOLE		1					RANGE		Direction E		
		- 11	11				MONITOR	RING FOR:			
			1				RADIONU EXPLOSI		PETROLEUM PRODUCTS ONLY METALS VOC		
				RISER			SVOCS	VES	PESTICIDES/HERBICIDESS		
ELEVATION	FT.			RISER PIPE DIAME	ETER	2.0IN.					
				RISER PIPE LENG	TH _	<u>37.0</u> FT.		ED USE OF			
ANNULAR SEAL				HOLE DIAMETER				GRATION WELL	X OBSERVATION		
LENGTH43	<u>3.0</u> FT.		+	WEIGHT OR SDR#		SCH40	PIEZOM	CTION WELL	OPEN HOLE		
SLURRY CH	HIPS						DIRECT				
PELLETS GR CEMENT/SLURRY	RANULAR	7 11		MATERIAL STEEL	V THE	RMOPLASTIC (PVC)	DEF	TH	FORMATION		
IF CEMENT/BENTO	NITE MIX:			OTHER		(1 TO)	FROM	ТО	DESCRIPTION		
BAGS OF CEMENT	LISED:			L U							
%OF BENTONITE U							0.0 7.5		SLTY CLY		
WATER USED/BAG:							7.5 14.5	-	SLTY SND		
	O/12.		_	BENTONITE SEAL			16.4		SLT		
				LENGTH:5.5		_	18.8		SLTY CLY		
				X CHIPS PEL	LETS	GRANULAR	20.0	22.0	SLTY SND		
				SLURRY			22.0		CLY SLT		
				SATURATED ZONE		HYDRATED	26.5		SND		
SECONDARY FILTE		1 11					40.0		SLTY SND		
LENGTH:	<u>∪.∪</u> ⊢1.			SCREEN			41.8 43.4		SLTY CLY SND		
				SCREEN DIAMET	ER:	2.0IN.	50.0		SND		
				SCREEN LENGTH	1 :	<u>5.0</u> FT.	00.0	00			
DEPTH TO TOP OF				DIAMETER OF DR							
FILTER PACK:	<u>56.5</u> FT.		erone Familie	DEPTH TO TOP _		<u>i9.0</u> FT.					

FOR CASED WELLS, SUBMIT ADDITIONAL AS BUILT DIAGRAMS SHOWING WELL CONSTRUCTION DETAILS INCLUDING TYPE AND SIZE OF ALL CASING, HOLE DIAMETER AND GROUT USED.

SIGNATURE (PRIMARY COUNTRACTOR)
x JEFFREY INGRAM

PERMIT NUMBER
006124

I HEREBY CERTIFY THAT THE MONITORING WELL HEREIN DESCRIBED WAS CONSTRUCTED IN ACCORDANCE WITH MISSOURI
DEPARTMENT OF NATURAL RESOURCES REQUIREMENTS FOR THE CONSTRUCTION OF MONITORING WELLS

SIGNATURE (WELL DRILLER)
x JASON DRABEK

PERMIT NUMBER
004484

PERMIT NUMBER
004484

APPRENTICE PERMIT NUMBER
004484

LENGTH OF PRIMARY FILTER

PACK: _______7.5FT.

SCREEN MATERIAL

OTHER

MISSOURI DEPARTMEN		REF NO	0540522	DAT	E RECEIVED		12/23/2015			
NATURAL RESOURCES DIVISION OF		CR NO	0512533	CHE	CK NO.		12/23/20	015		
A A A A A A A A A A A A A A A A A A A	IIR\/EV				170065					
(573) 368-2165	OKVLI	STATE WELL NO				REVENUE NO. 122315				
MONITORING WELL		A206108 0 ENTERED NRSM	1/04/2016 IITK4		APPROVED B	Y		ROUTE		
CERTIFICATION RECORD			PH3							
		12/28/2015 12/28	/2015 12/28/2015							
INFORMATION SUPPLIED BY PRIMARY CONNOTE: THIS FORM IS NOT TO BE USED FOR NESTED WELLS	NTRACTOR OR	DRILLING CC	NTRACTOR							
OWNER NAME AMEREN MISSOURI	CONTACT NAME BILL KUTOSKY							VARIANCE GRANTED BY DNR		
OWNER ADDRESS 3700 S LINDBERGH BLVD	CITY ST LOUIS			STA MO	TE	ZIP 6312	27	NUMBER		
SITE NAME AMEREN MISSOURI		WELL NUMBER MW-6				l		COUNTY JEFFERSON		
SITE ADDRESS RUSH INLAND ENERGY CENTER 100 BIG HOLLOW ROAD				CITY				STATIC WATER LEVEL 35.0 FT		
SURFACE COMPLETION TYPE LENGTH AND DIAMETER OF SURFACE COMPLETION	DIAMETER AND DI SURFACE COMPLI		E SURFACE COI	MPLE.	TION GROUT	LOCATIO	N OF WEL	L		
X ABOVE GROUND LENGTH <u>5.0</u> FT. FLUSH MOUNT DIAMETER <u>4.0</u> IN.	PLACED DIAMETER 12.0	IN.	X CONCRET	Έ			38°			
PLOSH MOONT DIAMETER 4.0 IN.	LENGTH <u>2.5</u> FT.		OTHER				90 _LEST	LARGEST		
								1/4 SE 1/4		
LOCKING CAP			SURFACE COMPL	ETTIC						
WEEP HOLE	I		STEEL X A	LUMINUN	PLASTIC	SEC RANGE		TWN. 39 NORTH Direction E		
	- 11						RING FOR:			
						RADIONU EXPLOSI		PETROLEUM PRODUCTS ONLY METALS VOC		
	- 111		RISER			svocs	VES	PESTICIDES/HERBICIDESS		
ELEVATIONFT.			RISER PIPE DIAME							
ANNULAR SEAL			RISER PIPE LENGT HOLE DIAMETER				ED USE O			
LENGTH 43.5FT.			WEIGHT OR SDR#			EXTRAC	CTION WELL	OPEN HOLE		
SLURRY CHIPS						PIEZOM				
PELLETS GRANULAR	4		MATERIAL	_		DIRECT	PUSH			
CEMENT/SLURRY IF CEMENT/BENTONITE MIX:	1 1 1		STEEL OTHER	X THE	RMOPLASTIC (PVC)	DEF		FORMATION		
BAGS OF CEMENT USED:			UTHEK			FROM	ТО	DESCRIPTION		
%OF BENTONITE USED:						0.0 2.0	2.0 7.0	SND SLTY SND		
WATER USED/BAG: GAL.						7.0	-	SLTY SND SLTY CLY		
			BENTONITE SEAL			10.0	11.5	SND		
			LENGTH:5.5			11.5		SLTY SND		
			X CHIPS PELL	.ETS	GRANULAR	20.0 21.0	21.0 22.1	SLTY CLY CLY SND		
			SATURATED ZONE		HYDRATED	22.1		SND SLTY CLY		
SECONDARY FILTER PACK	1 1					41.7	50.0	SLT CLY		
LENGTH: <u>0.0</u> FT.			SCREEN			50.0	55.0	SLTY SND		
			SCREEN DIAMETE	R:	2.0IN.	55.0	60.5	GRVL		
			SCREEN LENGTH							
DEPTH TO TOP OF PRIMARY			DIAMETER OF DR							
FILTER PACK:52.0FT.		or the last	DEPTH TO TOP	5	5 <u>5.5</u> FT.					

SCREEN MATERIAL

SIGNATURE (APPRENTICE)

OTHER

FOR CASED WELLS, SUBMIT ADDITIONAL AS BUILT DIAGRAMS SHOWING WELL CONSTRUCTION DETAILS INCLUDING TYPE AND SIZE OF ALL CASING, HOLE DIAMETER AND GROUT USED.

PERMIT NUMBER

PERMIT NUMBER 004484

006124

HEREBY CERTIFY THAT THE MONITORING WELL HEREIN DESCRIBED WAS CONSTRUCTED IN ACCORDANCE WITH MISSOURI DEPARTMENT OF NATURAL RESOURCES REQUIREMENTS FOR THE CONSTRUCTION OF MONITORING WELLS

LENGTH OF PRIMARY FILTER

PACK: <u>8.5</u>FT.

SIGNATURE (PRIMARY COUNTRACTOR)

SIGNATURE (WELL DRILLER) × JASON DRABEK X THERMOPLASTIC (PVC)

TOTAL DEPTH:

10/30/2015

PUMP INSTALLED

DATE WELL DRILLING WAS COMPLETED

APPRENTICE PERMIT NUMBER

_60.5 FEET

MISSOURI DEPARTMEN	NT OF	REF NO		DATE RECEIVED					
NATURAL RESOURCES	;		0512534		12/23/2015				
DIVISION OF		CR NO		CHECK NO.	470005				
🛮 🧸 🛮 🛞 🖟 GEOLOGY AND LAND S	URVEY	STATE WELL NO				170065 REVENUE NO.			
(573) 368-2165		A206109 01/04/2016				122315			
MONITORING WELL		ENTERED NRSMITK4 APPR			BY	ROUTE			
CERTIFICATION RECORD		PH1 PH2	PH3						
		12/28/2015 12/28	/2015 12/28/2015						
INFORMATION SUPPLIED BY PRIMARY COLOROTE: THIS FORM IS NOT TO BE USED FOR NESTED WELLS	NTRACTOR OR	DRILLING CO	ONTRACTOR						
OWNER NAME AMEREN MISSOURI	CONTACT NAME BILL KUTOSKY						VARIANCE GRANTED BY DNR		
OWNER ADDRESS 3700 S LINDBERGH BLVD	CITY ST LOUIS			STATE MO	ZIP 631:	27	NUMBER		
SITE NAME AMEREN MISSOURI			WELL NUMBER MW-7			COUNTY JEFFERSON			
SITE ADDRESS RUSH INLAND ENERGY CENTER 100 BIG HOLLOW ROAD)			CITY FESTUS			STATIC WATER LEVEL 41.05 FT		
SURFACE COMPLETION TYPE LENGTH AND DIAMETER OF	DIAMETER AND D		LE SURFACE COM	MPLETION GROUT	LOCATIO	ON OF WELL	-		
SURFACE COMPLETION	SURFACE COMPL PLACED								
X ABOVE GROUND LENGTH 5.0 FT. FLUSH MOUNT DIAMETER 4.0 IN.	IN.	X CONCRET	E	LAT					
PLOSH MOONT DIAMETER 4.0 IN.	LENGTH 2.5 FT.		OTHER			<u>90 ° </u>	S 45.17 LARGEST		
							1/4 NW 1/4		
LOCKING CAP			SURFACE COMPLI	ETTION					
WEEP HOLE	1-	=1' $=$	STEEL X AL	UMINUM PLASTIC	SEC	4 T	WN. <u>39</u> NORTH		
			L		RANGE		Direction <u>E</u>		
					MONITO	RING FOR:	DET DOLEUM DEODUCTO ONLY		
			_		EXPLOS		PETROLEUM PRODUCTS ONLY METALS VOC		
	- 1		RISER		svocs		PESTICIDES/HERBICIDESS		
ELEVATIONFT.			RISER PIPE DIAMET	<u> </u>					
ANNULAR SEAL			RISER PIPE LENGTI HOLE DIAMETER			SED USE OF	WELL X OBSERVATION		
LENGTH72.5FT.			WEIGHT OR SDR#			CTION WELL	OPEN HOLE		
— <u> </u>			WEIGHT GIT GEN		PIEZON	METERS	_		
SLURRY CHIPS PELLETS GRANULAR	4 1		MATERIAL		DIREC*	T PUSH			
CEMENT/SLURRY			STEEL	X THERMOPLASTIC (PVC)	DEI	PTH	FORMATION		
IF CEMENT/BENTONITE MIX:			OTHER		FROM	TO	DESCRIPTION		
BAGS OF CEMENT USED:			L		0.0	5.0	SLTY SND		
%OF BENTONITE USED:					5.0		CLY SND		
WATER USED/BAG: GAL.					10.0		SLT CLY		
			BENTONITE SEAL		32.0		SNDY SLTY CLY		
			LENGTH: 7.0	ETS GRANULAR	34.6		SND		
			SLURRY	GRANULAR	40.0 52.0		SND GRVL		
			SATURATED ZONE	HYDRATED	52.5		SND		
SECONDARY FILTER PACK	1 - 1 - 7				57.0		CLY SND		
LENGTH: <u>0.0</u> FT.	7 1 1				59.5	82.3	SND		
			SCREEN DIAMETE	D. OIN	82.3	97.0	SND		
	F		SCREEN DIAMETE SCREEN LENGTH:						
DEPTH TO TOP OF PRIMARY	37	-	DIAMETER OF DRI						
FILTER PACK:84.0FT.		ordering town ord town	DEPTH TO TOP						

FOR CASED WELLS, SUBMIT ADDITIONAL AS BUILT DIAGRAMS SHOWING WELL CONSTRUCTION DETAILS INCLUDING TYPE AND SIZE OF ALL CASING, HOLE DIAMETER AND GROUT USED.

SIGNATURE (PRIMARY COUNTRACTOR)
x JEFFREY INGRAM

1 DATE WELL DRILLING WAS COMPLETED
10/28/2015

I HEREBY CERTIFY THAT THE MONITORING WELL HEREIN DESCRIBED WAS CONSTRUCTED IN ACCORDANCE WITH MISSOURI
DEPARTMENT OF NATURAL RESOURCES REQUIREMENTS FOR THE CONSTRUCTION OF MONITORING WELLS

SIGNATURE (WELL DRILLER)
x JASON DRABEK

PERMIT NUMBER
004484

PERMIT NUMBER
004484

SIGNATURE (APPRENTICE)
X JASON DRABEK

LENGTH OF PRIMARY FILTER

PACK: _____13.0FT.

SCREEN MATERIAL

STEEL X

OTHER

/ \ \	OURI DEPARTMEN		REF NO		DATE RECEIVED				
	JRAL RESOURCES			512527	OUEOU NO	12/23/2015			
	SION OF		CR NO CHECK NO.				170065		
(N/2)	LOGY AND LAND S	URVEY	STATE WELL NO				REVENUE NO.		
, ,	368-2165		A206102 01/04/2016				122315		
MONITORING W			ENTERED NRSMI	TK4	APPROVED B	Υ		ROUTE	
CERTIFICATION	RECORD			PH3					
INFORMATION OF IDE	NIED DV DDIMADY OOM	ITDA OTOD OD	12/28/2015 12/28/2						
NOTE: THIS FORM IS NOT TO BE USED I	PLIED BY PRIMARY CONFORNESTED WELLS	NIRACIOR OR	DRILLING CO	NIRACIOR					
OWNER NAME AMEREN MISSOURI		CONTACT NAME BILL KUTOSKY						VARIANCE GRANTED BY DNR	
OWNER ADDRESS 3700 S LINDBERGH BLVD		CITY ST LOUIS			STATE MO	ZIP 6312	27	NUMBER	
SITE NAME AMEREN MISSOURI		l			WELL NUMBER MW-B1			COUNTY JEFFERSON	
SITE ADDRESS RUSH INLAND ENERGY CE	NTER 100 BIG HOLLOW ROAD				CITY FESTUS			STATIC WATER LEVEL 45.6 FT	
SURFACE COMPLETION TYPE	LENGTH AND DIAMETER OF SURFACE COMPLETION	DIAMETER AND DI	EPTH OF THE HOLE	SURFACE COM	PLETION GROUT	LOCATIO	N OF WELL	-	
A DOVE ODOUND		PLACED		TV CONODETE			00.0	01 4 401	
X ABOVE GROUND FLUSH MOUNT	LENGTH <u>5.0</u> FT. DIAMETER <u>4.0</u> IN.	DIAMETER 12.0 LENGTH 2.5 FT.	IIN.	X CONCRETE OTHER			38° 8		
				J 4			LEST	LARGEST	
								1/4 NE 1/4	
LOCKING CAP				SURFACE COMPLE					
WEEP HOLE		I		STEEL X ALU	MINUM	SEC RANGE		WN. 39 NORTH Direction E	
			11				RING FOR:	Direction <u>E</u>	
						RADIONU	ICLIDES	PETROLEUM PRODUCTS ONLY	
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FOR CASED WELLS, SUBMIT ADDITIONAL AS BUILT DIAGRAMS SHOWING WELL CONSTRUCTION DETAILS INCLUDING TYPE AND SIZE OF ALL CASING, HOLE DIAMETER AND GROUT USED.

SIGNATURE (PRIMARY COUNTRACTOR)

YEARING 1006124

I HEREBY CERTIFY THAT THE MONITORING WELL HEREIN DESCRIBED WAS CONSTRUCTED IN ACCORDANCE WITH MISSOURI
DEPARTMENT OF NATURAL RESOURCES REQUIREMENTS FOR THE CONSTRUCTION OF MONITORING WELLS

SIGNATURE (WELL DRILLER)

YASON DRABEK

TOTAL DEPTH: ____99.0 FEET

DATE WELL CASING, HOLE DIAMETER AND GROUT USED.

DATE WELL DRILLING WAS COMPLETED

10/28/2015

DATE WELL DRILLING WAS COMPLETED

10/28/2015

PUMP INSTALLED

PUMP INSTALLED

PUMP INSTALLED

APPRENTICE PERMIT NUMBER

004484

VALOUR 1004884

PERMIT NUMBER

004484

LENGTH OF PRIMARY FILTER

PACK: _____13.0FT.

SCREEN MATERIAL

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MONITORING W			ENTERED NRS	MITK4		APPROVED B	Y		ROUTE		
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				SLURRY			54.5		SLTY CLY		
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FOR CASED WELLS, SUBMIT ADDITIONAL AS BUILT DIAGRAMS SHOWING WELL CONSTRUCTION DETAILS INCLUDING TYPE AND SIZE OF ALL CASING, HOLE DIAMETER AND GROUT USED.

SIGNATURE (PRIMARY COUNTRACTOR)

X JEFFREY INGRAM

PERMIT NUMBER
006124

DATE WELL DRILLING WAS COMPLETED
10/27/2015

DATE WELL DRILLING WAS COMPLETED
10/27/2015

PUMP INSTALLED

SIGNATURE (WELL DRILLER)

PERMIT NUMBER
004484

PERMIT NUMBER
004484

SIGNATURE (APPRENTICE)
X JASON DRABEK

APPRENTICE PERMIT NUMBER

LENGTH OF PRIMARY FILTER

PACK: _____14.0FT.

SCREEN MATERIAL

OTHER

APPENDIX H Statistical Analysis Plan





STATISTICAL ANALYSIS PLAN

Prepared in accordance with the United States Environmental Protection Agencies Coal Combustion Rule, part 40 CFR 257.93 for Ameren Missouri's RCPA Surface Impoundment at the Rush Island Energy Center, Jefferson County, Missouri



Submitted To: Ameren Missouri

1901 Chouteau Avenue St. Louis, Missouri 63103

Submitted By: Golder Associates Inc.

820 S. Main Street, Suite 100 St. Charles, MO 63301 USA

Date: October 12, 2017

Project No.153-1406



EXECUTIVE SUMMARY

This Statistical Analysis Plan (SAP) was developed to meet the requirements of United States Environmental Protection Agency (USEPA) 40 CFR Part 257 "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule" (the Rule or CCR Rule). The Rule requires owners or operators of an existing Coal Combustion Residuals (CCR) Surface Impoundment to install a groundwater monitoring system and develop a sampling and analysis program (§§ 257.90 - 257.94). Ameren Missouri has determined that the RCPA Surface Impoundment at the Rush Island Energy Center in Franklin County, Missouri is subject to the requirements of the CCR Rule.

October 12, 2017

As a part of the groundwater sampling and analysis requirements of the Rule, statistical methods as described in Section §257.93(f) of the Rule need to be implemented to statistically evaluate groundwater quality. The selected statistical method must then be certified by a qualified professional engineer stating that the statistical method is appropriate for evaluating the groundwater monitoring data for the CCR Unit. Detailed descriptions of the acceptable statistical data methods are provided in the USEPA's *Statistical Analysis of Groundwater Data at RCRA Facilities, Unified Guidance* (USEPA, 2009) (Unified Guidance). The Unified Guidance is also recommended in the CCR Rule to be used for guidance in the selection of the appropriate statistical evaluation method.

This SAP details the statistical procedures to be used to establish background conditions, to implement detection monitoring, and to implement assessment monitoring (if needed) for Ameren Missouri at the above mentioned CCR Unit. Detailed information on collection, sampling techniques, preservation, etc. are provided in the Groundwater Monitoring Plan (GMP) for the CCR Unit specified above. This SAP is a companion documents to the GMP and assumes that data analyzed by the procedures described in this SAP are from samples that were collected in accordance with the GMP.

This SAP was prepared by Golder Associates, Inc. (Golder) on behalf of Ameren in order to document appropriate method of groundwater data evaluation in compliance with CCR Rules. The methods and groundwater data evaluation techniques used in this SAP are appropriate for evaluation of the groundwater monitoring data for the above mentioned CCR Unit and are in compliance with performance standards outlined in Section §257.93(g) of the CCR Rule.



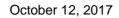


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Table 1

Physical Independence Confidence Interval Method Selection Table 2



1.0 BASELINE STATISTICS

This section discusses the procedures, methods, and processes that will be implemented as part of the Detection Monitoring statistical evaluation. Detection Monitoring will begin after eight rounds of sampling are completed at each monitoring well for each of the Appendix III and Appendix IV parameters. This background monitoring period provides baseline data for each monitoring well which can be used as the basis of the statistical evaluation. Detection monitoring will be completed on a semiannual basis unless adequate groundwater flow is not available for semiannual sampling and proper documentation as outlined in §257.94(d) is completed. Detection monitoring will analyze for Appendix III analytes as outlined in the Groundwater Monitoring Plan for this CCR Unit.

1

1.1 STATISTICAL DATA PREPARATION AND INITIAL REVIEW

Many of the statistical comparison tests used in detection, and assessment monitoring require various analyses to be completed prior to the data being used for the calculation of statistical limits. This section discusses the methods and procedures for completing this initial review of the data. The analyses required include testing for statistical independence, physical independence, and procedures to evaluate potential outliers.

1.1.1 Physical and Statistical Independence of Groundwater Samples

Detection, and Assessment Monitoring statistical evaluations assume that background and downgradient sampling results are statistically independent. The Unified Guidance states that "Physical independence of samples does not guarantee statistical independence, but it increases the likelihood of statistical independence." (Section 14.1, Unified Guidance). Physical independence is most likely achieved when consecutive groundwater samples are collected from independent volumes of water within a given aquifer zone. Using the Darcy Equation, minimum time intervals between sampling events can be calculated in order to confirm the minimum time interval for groundwater to travel through the borehole is less than the time between sampling events (**Table 1, Physical Independence**). This minimum time can be calculated as displayed in Section 14.3.2 of the Unified Guidance.



	I Is advanted	A			
	Hydraulic	Average Hydraulic			
Well ID	Conductivity	Gradient	Effective Porosity	Well Bore Volume	Minimum Time
Symbol	K	1	n	D	T_{min}
Units	Feet/Day	Feet/Foot	%	Feet	Days
MW-1	88	0.0007	0.35	0.5	2.8
MW-2	64	0.0007	0.35	0.5	3.9
MW-3	44	0.0007	0.35	0.5	5.7
MW-4	56	0.0007	0.35	0.5	4.5
MW-5	92	0.0007	0.35	0.5	2.7
MW-6	37	0.0007	0.35	0.5	6.8
MW-7	37	0.0007	0.35	0.5	6.8
MW-B1	54	0.0007	0.35	0.5	4.6
MW-B2	45	0.0007	0.35	0.5	5.6

Table 1: Physical Independence

2

Notes:

- Average hydraulic gradient and effective porosity taken from table 2 in the Groundwater Monitoring Plan (GMP)
- 2. Hydraulic Conductivity taken from table 3 of the Groundwater Monitoring Plan (GMP)
- 3. Calculation completed using the Darcy Equation as outlined in section 14.3.2 of the Unified Guidance.

1.1.2 Data Review – Testing For Outliers

Careful review of the data is critical for verifying that there is an accurate representation of the groundwater conditions. Early identification of anomalous data (outliers) helps play a key role in a successful SAP. Possible causes for outliers include:

- Sampling error or field contamination;
- Analytical errors or laboratory contamination;
- Recording or transcription errors;
- Faulty sample preparation, preservation, or shelf-life exceedance; or
- Extreme, but accurately detected environmental conditions (e.g., spills, migration from the facility).

The following sections outline a few graphical and statistical tests that should be completed prior to the data being used to calculate statistical limits.

1.1.2.1 Time Series Plots

Time Series plots are a quick and simple method to check for possible outliers. Time series plots should be generated with the concentration of the analyte on the Y-axis and the sample date (time) on the X-axis. If any data points look to be potential outliers, the data should be flagged and further evaluated as described in Section 1.1.2.2 below.



1.1.2.2 Dixon's and Rosner's Tests

If graphical methods demonstrate that potential outliers exist, further investigation of these data points can be completed using Dixon's test for datasets with fewer than 25 samples and Rosner's test with datasets greater than 20 samples. Formal testing should only be performed if an observation seems particularly high compared to the rest of the dataset. If statistical testing is to be completed to whether an outlier exists, it should be cautioned that these outlier tests assume that the rest of the data (other than the outlier) are normally distributed. Additionally, because log-normally distributed data often contain one or more values that appear high relative to the rest, it is recommended that the outlier test be run on the transformed values instead of their original observations. This way, one can avoid classifying a high log-normal measurement as an outlier just because the test assumptions were violated. Most groundwater statistical packages can complete Dixon's and Rosner's tests and more information about Dixon's and Rosner's tests is provided in Sections 12.3 and 12.4 of the Unified Guidance. If the test designates an observation as a statistical outlier, the source of the abnormal measurement should be investigated. In general, if a data point is found to be a statistical outlier, it should not be used for statistical evaluation. However, outlier removal should be performed carefully, and typically only when a specific cause for the outlier can be identified.

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In some cases where a specific cause for an outlier cannot be identified, professional judgment can be used to determine whether the outlier significantly affects the statistical results to the extent that removal is deemed necessary. If an outlier value with much higher concentration than other background observations is not removed from background prior to statistical testing, it will tend to increase both the background sample mean and standard deviation. In turn, this may substantially raise the magnitude of the prediction limit or control limit calculated from that data set. Thus, experience shows that it is a good practice to remove obvious outliers from the database even when independent evidence of the source of the outlier does not exist. The removal of outliers tends to normalize the data and therefore produce a more robust statistical limit. Outlier removal also tends to produces a more conservative statistical limit, since the data variability is decreased, thereby decreasing the standard deviation.

1.2 Upgradient Monitoring Wells

Following the identification and removal of outliers, the upgradient data are further reviewed to determine appropriate methods for statistical evaluation to maintain adequate statistical power while minimizing the chance of false positives. The following sections describe the procedures and methods that should be used, based on the background dataset, to compare the background datasets, to calculate the data distribution, to handle non-detect (ND) data, and to select appropriate statistical evaluation methods (interwell vs intrawell).

1.2.1 Calculate for Mean and Standard Deviation

Following outlier removal, initial summary statistics including mean and standard deviation should be calculated for the background monitoring well datasets. While these summary statistics are easily



completed in many groundwater statistical software packages, it is important to account for values that have low or zero values as described below.

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1.2.1.1 Reporting of Low and Zero Values

1.2.1.1.1 Estimated Values (J Flag)

Estimated values are values that have a concentration between the method detection limit (MDL¹) and the practical quantitation limit (PQL²) for any given compound. These values are typically displayed with a J flag in laboratory report packages and are often referred to as "J-values". In most cases, The Unified Guidance recommends using the estimated value provided for statistical evaluation. Estimated values are typically used because the accuracy and power of most statistical evaluations lose power as the percentage of non-detects increases. While they are below the PQL, estimated values are considered detectable concentrations for statistical calculations, which has the effect of lowering the percentage of non-detects.

This "rule" should be applied with care, as there is an exception. Estimated values are not considered detectable concentrations if all values for a single constituent are less than the PQL. This is discussed in more detail in Section 1.3.5 of this document.

1.2.1.1.2 Non-Detects Values (ND)

Non-Detect Values (ND) are concentrations that were not detected at a concentration above the MDL. ND values are typically displayed with a "U" or "ND" flag in laboratory data report packages. The following approaches for managing ND values are based on recommendations in the Unified Guidance and are applicable for use with the statistical evaluation procedures that will be further discussed and used in this SAP (prediction intervals, confidence intervals, and tolerance intervals):

- If <15% ND, substitute ½ the PQL;
- If between 15% to 50% ND, use the Kaplan-Meier or robust regression on ordered statistics to estimate the mean and standard deviation;
- If >50% but less than 100% ND, use a non-parametric test; or
- If 100% of values are less than the PQL, use the Double Quantification Rule.

1.2.2 Data Distribution

Statistical evaluations of groundwater data require an understanding of the data distribution for each analyte in each monitoring well. Data typically fall into one of the following distributions:

² PQL = minimum concentration of an analyte (substance) that can be measured with a high degree of confidence that the analyte is present at or above that concentration (typically 5-10x higher than the MDL).



¹ MDL = lowest level of an analyte (substance) that the laboratory can reliably detect with calibrated instrumentation; generally based on results of an annual "MDL study" performed in accordance with 40 CFR Part 136, Appendix B; MDLs are generally set using laboratory grade deionized water spiked with a known concentration and thus do not account for effects of matrix interference inherent in typical groundwaters.

Normal distribution - Sometimes referred to as Gaussian distribution, a normal distribution is a common continuous distribution where data form a symmetrical bellshaped curve around a mean. Normally distributed data are tested using parametric methods.

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- Transformed-normal distribution Similar to a normal distribution, however, data are asymmetrical until transformation is applied to all data which then causes it to form a bell-curve. Transformed-normal data distributions are also tested use parametric methods.
- Non-Normal Distribution When the data are not or cannot be transformed into a symmetrical distribution. Non-normal data distributions are tested using Nonparametric methods.

Testing for data distributions can be completed in several different ways including the skewness coefficient, probability plots with Filliben's test, or the Shapiro-Wilk/Shapiro-Francia Test. All of these methods may be employed, however, the Shapiro-Wilk and Shapiro-Francia tests are generally considered the best method according to the Unified Guidance. The Shapiro-Wilk test is best for sample sizes under 50 while the Shapiro-Francia test is best with larger datasets of 50 or more observations. Most groundwater statistical software packages can complete both Shapiro-Wilk and Shapiro-Francia tests and a detailed discussion of the testing procedures is provided in Section 10.5.1 of the Unified Guidance.

Based on the outcome of the data distribution testing, data will use either Parametric or Non-parametric tests. It is important to note that non-parametric testing usually requires larger datasets in order to minimize the Site Wide False Positive Rate (SWFPR) therefore when the raw data are not normally distributed, a transformed-normal distribution is preferred when possible.

1.2.3 Temporal Trend

Most statistical tests assume that the sample data are statistically independent and identically distributed. Therefore, samples collected over a period of time should not exhibit a time dependence. A time dependence could include the presence of trends or cyclical patterns when observations are graphed on a time series plot. Trend analysis methodologies test to see whether the dataset displays an increasing, decreasing, or seasonal trend. A statistically significant increasing or decreasing trend could indicate a release from the CCR unit (or alternative source) and further investigation of the cause of the trend may be necessary.

If a trend is suspected, a Theil-Sen trend line should be used to estimate slope and the Mann-Kendall Trend Test should be used to evaluate the slope significance (Chapter 14, Unified Guidance). If a statistically significant trend is reported, based on a Sen's slope/Mann-Kendall trend test, the source of the trend should be investigated. If the trend can be shown to be a result of an upgradient or off-site source, the data can be de-trended and used to calculated statistical limits. De-trending can be accomplished by computing a linear regression on the data (see Section 17.3.1 of the Unified Guidance) and then using the regression residuals instead of the original measurements in subsequent statistical analysis.



1.2.4 Comparing Background Datasets (Spatial Variation)

After physical independence, outlier, trend, and summary statistical testing is completed, the datasets from the background monitoring wells should be compared to one another for each individual constituent. The comparison of these background datasets is useful for determining whether spatial variability exists in the background dataset, and can also be used to decide whether an interwell or intrawell approach is more appropriate for statistical evaluation.

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Box and whisker plots can be used to perform side by side comparison for each well and can be completed for each individual analyte to determine if the variance is equal across the background datasets. If the box plots appear to be staggered and do not appear to be from the same population (same variance) then a Lavene's test using an α of 0.01 should be used as a check to determine if the background datasets have spatial variation. Testing methods and procedures are provided in Section 11.2 of the Unified Guidance.

The preferred method for comparing background datasets is a Mann-Whitney (or Wilcoxon Rank Sum) Test, which evaluates the ranked medians of both the historical and new dataset populations. An α of 0.05 should be used for this evaluation. After calculation, if the Mann-Whitney statistic does not exceed the critical point, the test assumes that the two data populations have equal medians, and therefore are likely from the same statistical distribution. The testing methods and procedures for this analysis are provided in Section 16.2 of the Unified Guidance.

If spatial variability is identified within the background dataset, an additional investigation may be needed in order to confirm that the variability is not caused by impacts from the CCR unit. If there is spatial variability and it is not caused by impacts from the CCR unit, then an intrawell approach to statistical evaluation may be appropriate.

1.3 Compliance Monitoring Wells and Statistically Significant Increases

After completing the previously described analyses of the background data, a statistical evaluation of the compliance monitoring data should be completed to determine if there are any Statistically Significant Increases³ (SSIs) that could trigger assessment monitoring. Section §257.93(F) of the CCR Rule specifies the list of methods that can be used for statistical evaluation. These specific methods to be used for statistical evaluation of data from the RMSGS are detailed below. Further, the Unified Guidance is recommended in the CCR Rule to be used for guidance in the selection of the appropriate statistical evaluation method. This section provides a guide to choosing the correct statistical evaluation to analyze the compliance wells for SSIs, the basic principles of each method, and response activities for identified SSIs.

³ SSI = a verified statistical exceedance; under compliance monitoring programs, the first time an exceedance is reported it is an initial statistical exceedance and is only considered an SSI if a confirmatory result verifies the initial exceedance.



1.3.1 Interwell vs Intrawell Statistical Analysis

1.3.1.1 Interwell Statistical Analysis

An interwell statistical evaluation compares the groundwater results from the compliance (downgradient) monitoring wells to a pool of background (typically upgradient) monitoring well results. If results from the downgradient wells are statistically higher (or significant) than the background dataset then an exceedance is triggered. This upgradient verses downgradient method typically assumes that:

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- Naturally, un-impacted groundwater characteristics in the compliance monitoring wells is comparable and equal on average to the background monitoring wells.
- Upgradient and downgradient monitoring well samples are drawn from the same aquifer and are screened in essentially the same hydrostratigraphic position.
- The aquifer unit is homogeneous and isotropic.
- Groundwater flow is in a definable pathway from upgradient to downgradient wells beneath the CCR Unit.

An interwell approach is preferable for statistical evaluation because it compares data to a background dataset that is not influenced by the CCR Unit. Interwell methods should be used with two exceptions: (1) there are significant differences in the datasets of the background wells (as indicated by methods described in Section 1.2.4) or (2) it can be demonstrated that groundwater geochemistry at all wells (background and compliance) is not impacted by the CCR Unit.

1.3.1.2 Intrawell Statistical Analysis

An intrawell statistical evaluation compares the groundwater results from a compliance monitoring well to historical data collected from that same compliance monitoring well. This method can be used for CCR monitoring when groundwater data from the background monitoring wells is statistically different than that of the compliance monitoring wells or when it can be shown that there is no impact from the CCR Unit in either upgradient or downgradient/compliance wells.

1.3.2 Statistical Power

As discussed above, one of the primary goals of the selection of a proper statistical evaluation method is to limit the potential for results to falsely trigger a SSI while also maintaining sufficient statistical power to detect a true SSI. Falsely triggering a SSI when no release from the CCR unit has occurred is referred to as a false positive. The False Positive Rate (FPR), typically denoted by the Greek letter α , is also known as the "significance level". The FPR is the probability that a future compliance observation will be declared to be from a different statistical distribution than the background data. If the FPR is set too high, it can lead to the conclusion that there is evidence of impact when none exists. Conversely, if the FPR is set too low, it can lead to a false conclusion that no contamination exists, when it actually does exist (also known as a "false negative"). Ultimately, the ability to accurately identify SSIs depends on the selection of an appropriate FPR, which is referred to as the statistical power. FPRs are set for each parameter (or for each



parameter in each well for intrawell analysis). However, statistical analysis programs and the resulting decision making do not depend on each individual measurement/comparison error rates, but are dependent on the collective error rate from all of the individual comparisons. When the individual FPRs are integrated over the entire statistical monitoring program, it is referred to as the site-wide false positive rate (SWFPR), which is a better measure of the ability of the entire statistical program to detect false positive observations.

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1.3.2.1 Site-Wide False Positive Rate

For CCR monitoring, detection monitoring events are based on multiple comparisons, which include the seven (7) Appendix III parameters, at each compliance monitoring well. The SWFPR can be calculated based on several input parameters, including the assumed FPR, the number of downgradient monitoring wells (n), the number of parameters, and the number of statistical comparisons events in a given year for the CCR Unit. The Unified Guidance recommends that a statistical evaluation program be designed with an annual, cumulative SWFPR of approximately 10%.

The Unified Guidance recommends measuring statistical power using power curves which display the probability that an individual comparison will detect a concentration increase relative to background results. After determining the statistical method based on the background data, a power curve can be generated in order to determine the statistical power of the compliance monitoring program. The methods and procedures for calculating the SWFPR are described in Section 6.2.2 of the Unified Guidance.

1.3.2.2 **Verification Sampling**

Verification Sampling is an important aspect of the SAP as it improves statistical power while maintaining the SWFPR. Most statistical evaluations incorporate verification sampling mathematically into their determination of the SWFPR. Verification sampling is typically completed at a 1 of 2 pass strategy. As described above if an initial statistical exceedance is reported, then verification sampling will be performed to confirm the initial exceedance. Verification samples should be collected on a schedule that allows for physical independence of the samples. In a 1 of 2 pass strategy, if the concentration of the verification sample is less than the calculated compliance limit, then no SSI is triggered. If the initial and subsequent verification observation are above the calculated compliance limit, a SSI is triggered.

Due to the time constraints for reporting put forth in the CCR rule, it is suggested that verification sampling not be completed at the next regularly scheduled sampling event, but instead be collected prior to the next sampling event. Verification sampling within 90 days (assuming a 1 of 2 pass verification sampling strategy) will typically allow sufficient time to complete laboratory and statistical analysis in accordance with the timeframes set forth in the CCR Rules.



1.3.3 Statistical Evaluation Methods

As outlined above, the CCR rule list 5 possible methods for statistical evaluation. The different methods that can be employed for CCR monitoring as outlined in §257.93(F) are:

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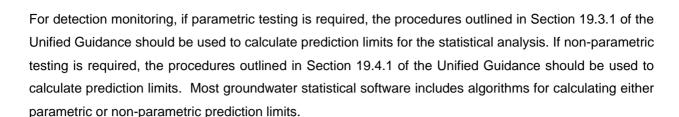
- §257.93(F)(1) "A parametric analysis of variance followed by multiple comparison procedures to identify statistically significant evidence of contamination. The method must include estimation and testing of the contrasts between each compliance well's mean and the background mean levels for each constituent."
- §257.93(F)(2) "An analysis of variance based on ranks followed by multiple comparison procedures to identify statistically significant evidence of contamination. The method must include estimation and testing of the contrasts between each compliance well's median and the background median levels for each constituent."
- §257.93(F)(3) "A tolerance or prediction interval procedure, in which an interval for each constituent is established from the distribution of the background data and the level of each constituent in each compliance well is compared to the upper tolerance or prediction limit."
- §257.93(F)(4) "A control chart approach that gives control limits for each constituent."
- **§257.93(F)(5)** "Another statistical test method that meets the performance standards of paragraph (g) of this section."

1.3.4 Prediction Intervals

Section §257.93(F)(3) outlines using prediction intervals or tolerance intervals for statistical evaluation. Based on recommendation from the Unified Guidance, prediction limits are the preferred method for calculating detection monitoring compliance limits and will be used to calculate compliance limits for the seven Appendix III constituents. In addition, the Unified Guidance suggests using prediction limits with verification sampling (Chapter 19 of the Unified Guidance), because prediction limits help to maintain low SWFPR while still providing high statistical power. Tolerance intervals, which are a backward looking procedure, should not be used for detection monitoring, but will likely be used in assessment monitoring, as further described in Section 2.0 below. If, at any point in the future, a different statistical method becomes more applicable to the site conditions, this document may be modified to include that method as recommended by the Unified Guidance.

Prediction interval methods can be used for parametric and non-parametric datasets as well as for intrawell or interwell statistical analysis. Prediction limits use background data from either background monitoring wells for interwell analysis or from historical data for intrawell analysis calculate a concentration that represents an upper limit of expected future concentrations for a particular population. In contrast to tolerance limits, prediction intervals are a forward looking, predictive analysis, which incorporate uncertainty in future measurements, and are thus the most appropriate method for detection monitoring programs. Typically, a one-sided upper prediction limit is used to evaluate detection monitoring observations. Observations must be lower than the prediction limit (or within the upper and lower prediction limits for pH) to be considered "in control". Parametric methods are generally preferred over non-parametric methods, because they result in lower SWFPRs and higher statistical power.





1.3.5 Double Quantification Rule

In situations where the entire background dataset is reported as ND or Estimated (J-flag), the Double Quantification Rule (DQR) will be used to supplement the prediction limit analyses. Generally, the Appendix III constituents occur at detectable concentrations in natural groundwater; however, if ND results are encountered for a given constituent, the DQR can be implemented. A demonstration that this statistical evaluation is as least as effective as any other test and results as described in §257.93(f)(5) can be made. The DQR is recommended by the Unified Guidance as a supplement to prediction limits because it reduces the number of non-detects used for statistical analysis and provides a lower SWFPR while maintaining statistical power.

Under the DQR, a SSI is triggered if a compliance well observation is higher than the reporting limit (RL)/PQL in either (1) both a detection monitoring sample and its verification resample, or (2) two consecutive sampling events in a program were resampling is not utilized.

1.4 Responding to SSIs

If the statistical evaluation for an Appendix III analyte triggers a SSI, the data must be evaluated to determine if the cause of the SSI is due to a release from the CCR Unit or from an alternative source. Possible alternative sources may include laboratory causes, sampling causes, statistical evaluation causes, or natural variation. If the SSI can be attributed to one of these sources and the SSI was not caused by the CCR Unit, an alternate source demonstration (ASD) can be completed. An ASD must be certified by a qualified professional engineer and completed in writing within 90 days of completing the statistical evaluation for a particular sampling event. If the SSI cannot be attributed to an alternative source and is from the CCR Unit, then Assessment Monitoring is triggered.

1.5 Updating Background Values

The Unified Guidance suggests that updating statistical limits should only be completed after a minimum of 4 to 8 new measurements are available (i.e., every 2 to 4 years of semiannual monitoring, assuming no verification sampling). The periodic update of background, during which additional data are incorporated into the background, improves statistical power and accuracy by providing a more conservative estimate of the true background population. Prior to incorporating new data into the background dataset, a test should be performed to demonstrate that the "new data" are from the same statistical population as the existing



background results. Below are three methods that can be used in determining if the "new" data should be included in the background:

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- Time Series Graphs As described in Section 1.1.2.1, time series graphs can be used as a qualitative test to assist with the determination whether a new group of data match the historical data or if there is a concentration trend that could be indicative of a release or evolving groundwater conditions.
- Box-Whisker plots can also be used to determine whether or not the datasets are similar.
- Mann-Whitney (or Wilcoxon Rank) Test Used to evaluate the ranked medians of both the historical and new dataset populations. An α of 0.05 should be used for this evaluation. After calculation, if the Mann-Whitney statistic does not exceed the critical point, the test assumes that the two data populations have equal medians, and therefore are likely similar.

Ultimately, the Mann-Whitney (Wilcoxon Rank Sum) Test is the statistical test that is used to determine whether new observations should be included in the background dataset. It is important to note that a difference in background datasets does not automatically prevent the new data from being used; however, if differences are noted, a review of the new data will be conducted to determine if the noted difference is a result of a change in the natural conditions of the groundwater or if it is the result of a potential release from the CCR Unit. If the new data are included in the background dataset, the prediction limits will be recalculated, as described in Section 1.3.4 above.





2.0 ASSESSMENT MONITORING STATISTICAL EVALUATION

This section discusses the procedures, methods, and processes that will be implemented as part of the assessment monitoring statistical evaluation, if required. Assessment monitoring will be initiated if a SSI is triggered during detection monitoring. As per the CCR Rule in Section §257.95(b), assessment monitoring must be initiated within 90 days of identifying an SSI (not the sample event which provided the data that resulted in the SSI). This 90-day period includes sampling the groundwater monitoring network for the Appendix IV constituents. Following the initial sampling event for all Appendix IV constituents, the monitoring network is then sampled again within 90 days of receiving the results from the initial Appendix IV sampling event. Following these initial assessment monitoring events, assessment monitoring is performed on a semiannual basis. During one of the two semiannual events, the full list of Appendix IV constituents must be tested. During the second assessment monitoring event of each year, only the Appendix IV constituents that are detected during the previous semiannual event are required to be Assessment monitoring is terminated if concentrations for all Appendix III and Appendix IV monitored. constituents in all compliance wells are statistically lower than background for two consecutive sampling events (§257.95(e)). The following sections discuss the procedures, methods, and processes that will be implemented as part of the assessment monitoring statistical evaluation. As discussed in Section 1.1 of this document, many of the statistical comparisons used in assessment monitoring require various analyses to be completed prior to the data being accepted into the statistical evaluation. Before using the results from assessment monitoring, the steps outlined in Sections 1.1 and 1.2 will be completed. Please refer to those sections for descriptions on the methods and techniques required to complete these analyses.

2.1 Establishing a Ground Water Protection Standard (GWPS)

Following the removal of outliers and the performance of general statistics described in Sections 1.1 and 1.2, GWPS will be developed for use in the assessment monitoring program. The GWPS is a key element to the assessment monitoring process. GWPS must be generated for each of the detected Appendix IV analytes. If interwell methods are utilized (preferred method), a site-wide GWPS will be generated for each analyte based on Appendix IV results reported for background/hydraulically upgradient wells. If intrawell methods are utilized, a well specific GWPS will be generated for each analyte.

For Appendix IV parameters that have a maximum contaminant level (MCL), as established by the United States Environmental Protection Agency, the GWPS is set equal to the MCL. For those constituents whose background concentration are greater than the MCL, the GWPS will be calculated from the background data. Finally, for those constituents that do not have an established MCL, the GWPS will be calculated. Several analytes (cobalt, lead, lithium, and molybdenum) do not have MCLs established and therefore the GWPS must be calculated based on their background concentrations.



2.1.1 Maximum Contaminant Level (MCL) Based GWPS

Many of the Appendix IV analytes have USEPA MCL levels. As specified in the CCR Rule in Section §257.95(b), the GWPS must either be the MCL, or a limit based on background data, whichever is greater. This section describes the methods to be used for statistical analysis when the MCL is to be used as the GWPS.

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For Assessment Monitoring, the Unified Guidance recommends the confidence interval method to evaluate for potential exceedances, which are referred to as "statistically significant levels" (SSLs) (Chapter 21, Unified Guidance). Using confidence intervals, SSLs are identified by comparing the calculated confidence interval against the GWPS. A confidence interval statistically defines the upper and lower bounds of a specified population within a stipulated level of significance. Confidence intervals are required to be calculated based on a minimum of 4 independent observations, but a more representative confidence interval can be developed when all of the available data are utilized.

The specific type of confidence interval should be based the attributes of the data being analyzed, including: (1) the data distribution, (2) the detection frequency, and (3) potential trends in the data. Table 1 below is based on Table 4-4 from the Electric Power Research Institute's *Groundwater Monitoring Guidance for the Coal Combustion Residual Rule* (2015), which displays the criteria for selecting an appropriate confidence interval. The method and procedure for calculating the Upper Confidence Limit (UCL) and Lower Confidence Limit (LCL) is provided in the section reference from the Unified Guidance, which is listed in the last column of Table 1, below.



Table 2- Confidence Interval Method Selection

Data Distribution	Non-detect Frequency	Data Trend	Confidence Interval Method
Normal	Low	Stable	Confidence Interval Around Normal Mean (Section 21.1.1)
Transformed Normal Low		Stable	Confidence Interval Around Lognormal Arithmetic Mean (Section 21.1.3)
Non-normal	N/A	Stable	Nonparametric Confidence Interval Around Median (Section 21.2)
Cannot Be Determined	High	Stable	Nonparametric Confidence Interval Around Median (Section 21.2)
Residuals After Subtracting Trend are Normal (with equal variance)	Low	Trend	Confidence Band Around Linear Regression (Section 21.3.1)
Residuals after Subtracting Trend are Non-Normal	Low	Trend	Confidence Band Around Theil-Sen Line (Section 21.3.2)

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In an assessment monitoring program the LCL is of prime interest. If the LCL exceeds the GWPS, there is statistical evidence that a SSL has been triggered. An initial SSL should be confirmed by verification sampling. If only the UCL exceeds the GWPS while the LCL is below the GWPS, the test is considered inconclusive and the Unified Guidance recommends that this situation be interpreted as "in compliance". If both the UCL and the LCL are below the GPWS, the data are also "in compliance" with the GWPS.

It is important to note that a slightly different set of criteria are used to determine whether assessment monitoring can be terminated. Additional discussion of the criteria used for exiting assessment monitoring and returning to detection monitoring is provided below in Section 2.2.

During Assessment Monitoring, a per test FPR (α) of 0.05 will be used as an initial error level for calculating the two-tailed confidence intervals for the compliance wells (which actually means 2.5% FPR per tail). In some cases based on recommendations from the Unified Guidance, it is appropriate to adjust the FPR of the confidence interval based on the number of data points available as well as the distribution of the data being evaluated. If deemed necessary based on recommendations from the Unified Guidance, an approach is provided in Section 22 of the Unified Guidance for determining an appropriate per test FPR based on the data characteristics.



When performing assessment monitoring statistical evaluations, it is important to evaluate the compliance data for shifts. If no shifts have occurred, then all of the available Appendix IV data for a particular constituent can be used in the statistical evaluation. If shifts are noted (typically based on qualitative evaluation of a time series plot), only the data collected after the shift should be used in the statistical evaluation.

2.1.2 Non-MCL Based GWPS

Background or historical concentration limits should be assessed using the following techniques for all Appendix IV analytes. These concentration limits should then be compared with the MCL, if available, and the higher of these two values will be used as the GWPS.

The Unified Guidance provides two acceptable approaches for establishing a non-MCL based GWPS (unless all values are ND, in which case the Double Quantification Rule as described above in Section 1.3.5 should be used). The two methods include the tolerance interval approach or the prediction interval approach.

2.1.2.1 Tolerance Interval Approach

If the background dataset is normally or transformed normally distributed, the Unified Guidance recommends Tolerance Intervals over the Prediction Intervals for establishing a GWPS. The GWPS should be based on a 95 percent coverage/95 percent confidence tolerance interval. If the background data are non-normal (even after transformation), then a large number of background observations are required to calculate a non-parametric tolerance interval (typically a minimum of 60 background observations are required to meet these requirements). If there is an insufficient number of background observations to calculate a non-parametric tolerance interval, then a non-parametric Prediction Interval approach should be used, as described in Section 2.1.2.2 below.

The Upper Tolerance Limit (UTL) is calculated for each detected Appendix VI constituent. Tolerance Limits, as outlined in the Unified Guidance (Section 17.2), are a concentration limit that is designed to contain a pre-specified percentage of the dataset population. Two coefficients associated tolerance intervals are (1) the specified population proportion and (2) the statistical confidence. The coverage coefficient (γ), which is used to contain the population portion, and the tolerance coefficient (or confidence level (1- α)), which is used to set the confidence of the test. Typically, the UTL is calculated to have a coverage and confidence of 95%. When an MCL does not exist or the background concentrations are greater than the MCL, the calculated UTL for each constituent is used as the GWPS. The confidence interval for each compliance well is then compared with the GWPS.

In order to calculate a valid confidence interval, a minimum of four data points are necessary for each of the detected Appendix IV constituents in each compliance monitoring well (or four "new" assessment



monitoring observations in each well when intrawell statistical methods are employed). Using the Tolerance Interval Approach, a statistically significant level (SSL) is triggered when calculated lower confidence limit (LCL) for each compliance well is greater than the GWPS.

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Tolerance limits can be completed using both parametric (Section 17.2.1 of Unified Guidance) or nonparametric methods (Section 17.2.2 of Unified Guidance). However, as described above, the nonparametric method requires at least 60 background (or historical) measurements in order to achieve 95% confidence with 95% coverage. Tolerance Intervals can be calculated using most groundwater statistical software packages.

2.1.2.2 **Prediction Interval Approach**

If Tolerance Intervals cannot be used to calculate the GWPS (based on recommendation from the Unified Guidance, such as non-parametric datasets, ect.), then a Prediction Interval method should be used. This method is very similar to Section 1.3.4 of this document, however, for assessment monitoring, the Unified Guidance suggests using a prediction interval about a future mean for normally/transfomred-normally distributed datasets or a prediction interval about a future median for datasets with a high percent of ND or non-normally distributed data.

When using prediction intervals to calculate for a GWPS, a one-sided prediction interval is calculated using background (or historical) datasets based on a specified number of future comparisons - four future comparisons is typical. The Upper Prediction Limit that is calculated as a product of this method then becomes the GWPS, and is compared against the confidence interval for the compliance data, as described in Section 2.1.2.1, above. As also described above, if the LCL is greater than the calculated prediction limit then an SSL is triggered.

2.2 **Returning to Background Detection Monitoring**

As specified in 257.95(e) of the CCR Rule, in order to return to detection monitoring, the concentration of all constituents listed in Appendix III and Appendix IV must be shown to be at or below calculated "background (or historical) values" for two consecutive semiannual sampling events. This determination of background values is based on the statistical evaluation procedure established for detection monitoring. Therefore, if prediction limits (with the double quantification rule for analytes with all non-detects) are used for detection monitoring, prediction limits should be calculated and used for all Appendix III and IV analytes to determine when the monitoring program can return to Detection Monitoring. It is important to remember that Appendix IV constituents are only required to be sampled annually with only those Appendix IV constituents that are detected during the previous semiannual event being required to be analyzed during the second semiannual event of a given year. If statistical results demonstrate that concentrations for all constituents are below background levels for a particular event, all Appendix IV constituents should be sampled during the next event in order to achieve this goal of returning to Detection Monitoring. If this



statistical evaluation demonstrates that any of the Appendix III or Appendix IV are at a concentration above background levels, but no SSLs have been triggered, then the CCR unit will remain in assessment monitoring (257.95(f)).

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2.3 Response to a SSL

If the assessment monitoring statistical evaluation demonstrates that a SSL has been triggered, then the owner/operator of the CCR unit must complete the following four actions as described in 257.95(g):

- 1. Prepare a notification identifying the constituents in Appendix IV that have exceeded a CCR Unit specific GWPS. This notification must be placed in the facilities operating record within 30 days of identifying the SSL
- 2. Define the nature and extent of the release and any relevant site conditions that may affect the corrective action remedy that is ultimately selected. The characterization must be sufficient to support a complete and accurate assessment of the corrective measures necessary to effectively clean up releases from the CCR Unit and must include at least the following:
 - A. Installation of additional monitoring wells that are necessary to define the contaminant plume,
 - B. Collect data on the nature and estimated quantity of the material released,
 - C. Install and sample at least one additional monitoring well at the facility boundary in the direction of the contaminant plume migration,
- 3. Notify off-site property owners if the contamination plume has migrated offsite on to their property, and
- 4. If possible, provide an alternative source demonstration that determines that the SSL is not caused by a release at the facility within 90 days of completing the statistical evaluation. If no alternative source demonstration can be made and the plume is determined to have come from the CCR Unit then initiate corrective action.

Actions 1-3 must be completed regardless of whether or not an alternate source demonstration can be made.

2.4 **Updating Background Values**

The background for Assessment Monitoring Parameters should be updated using the same methods and techniques described in Section 1.5 for updating detection monitoring background data.





3.0 REFERENCES

- EPRI. 2015. Groundwater Monitoring Guidance for the Coal Combustion Residual Rule. Electric Power Research Institute. November.
- USEPA. 2009. Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance.

 Office of Resource Conservation and Recovery Program Implementation and Information Division.

 March
- USEPA. 2015. Federal Register. Volume 80. No. 74. Friday April 17, 2015. Part II. Environmental Protection Agency. 40 CFR Parts 257 and 261. Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule/ [EPA-HQ-RCRA-2009-0640; FRL-9919-44-OSWER]. RIN-2050-AE81. April.



APPENDIX I Example Field Forms

Sheet o	of
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Project	Ref:						Project N	No.:		
Locati	on									
Monitore	d By:			Date			Time			
Well P	ezom	eter Data	ì							
		(circle one)								
Depth of \	Well (from	top of PVC or	ground)					feet		
Depth of \	Water (fror	m top of PVC o	or ground)					feet		
Radius of	Casing							inches		
								feet		
Casing Vo	olume							cubic feet		
								gallons		
Devel	opmen	t / Purgir	ng Disc	charge	e Data					
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Date	Time	Volume Discharge (gals)	Temp (°)	рН	Spec.Cond. (S/cm)	Turbidity (NTU)	Dissolved Oxygen (mg/L)	Redox Potential (+/- mV)	WL (ft TOC)	Appearance of Water and Comments
_										

Date	Time	Volume Discharge (gals)	Temp (°)	рН	Spec.Cond. (S/cm)	Turbidity (NTU)	Dissolved Oxygen (mg/L)	Redox Potential (+/- mV)	WL (ft TOC)	Appearance of Water and Comments

GROUNDWATER SAMPLE COLLECTION FORM



Teflon

Hand Pump

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Golder	ABOVE G	ROUND MONITORING W	ZELL CONSTRUCTION LOG
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SITE NAME:		LOCA	ATION:
CLIENT:		SURF	FACE ELEVATION:
GEOLOGIST:		NORTHING:	EASTING:
DRILLER:		STATIC WATER LEVEL:	COMPLETION DATE:
DRILLING COMPANY:		DRIL	LING METHODS:
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			AMOUNT OF BACKFILL:
CHECKED BY:			PREPARED BY:



RECORD OF WATER LEVEL READINGS

Project Name: Location:						Project No.:				
Borehole No.	Date	Time	Measuring Device / Serial No.	Measurement Point (M.P)	Water Level Below M.P.	Correction To Survey Mark	Survey Mark Elevation	Water Level Elevation	Ву	Comments

Sheet ___ of ___



Project Name:			Project No:	
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Instrument Details				
Instrument Name				
Serial No.				
Model No.				
Calibration Details				
Required Calibration Freque	ency/Last Ca	alibration		
Calibration Standard				
Calibration Standard(s) Exp	iration Date	:		
Calibration:	Date	Time	Calibration Standard Units:	Instrument Reading Units:
Comments:				

Chain of Custody Record >>> Select a Laboratory <<< #N/A #N/A #N/A Regulatory Program: DW NPDES RCRA Other: #N/A COC No: **Client Contact** Project Manager: Site Contact: Date: Tel/Fax: Carrier: COCs Your Company Name here Lab Contact: of Address **Analysis Turnaround Time** Sampler: For Lab Use Only: WORKING DAYS City/State/Zip CALENDAR DAYS Walk-in Client: Phone (xxx) xxx-xxxx TAT if different from Below FAX Lab Sampling: (xxx) xxx-xxxx 2 weeks Project Name: 1 week Site: Job / SDG No.: 2 days P O # 1 day Sample Type Sample Sample # of (C=Comp, Sample Identification Date Time G=Grab) Matrix Cont. Sample Specific Notes: Preservation Used: 1= Ice, 2= HCI; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other Possible Hazard Identification: Sample Disposal (A fee may be assessed if samples are retained longer than 1 month) Are any samples from a listed EPA Hazardous Waste? Please List any EPA Waste Codes for the sample in the Comments Section if the lab is to dispose of the sample. Unknown Poison B Return to Client Archive for___ Non-Hazard Flammable Disposal by Lab Months Special Instructions/QC Requirements & Comments: **Custody Seals Intact:** Cooler Temp. (°C): Obs'd: Corr'd: Therm ID No.: Custody Seal No .: Yes No. Relinquished by: Date/Time: Received by: Company: Company: Date/Time: Relinguished by: Date/Time: Date/Time: Received by: Company: Company:

Date/Time:

Company:

Received in Laboratory by:

Company:

Relinquished by:

Date/Time:

Golder Associates

Field Boring Log

DEPTH HOLE PROJ. NO DEPTH SOIL DRILL GA INSP DEPTH ROCK CORE WEATHER	PROJECT DRILLING METHOD DRILLING COMPANY		BORING NO OF OF
ABANDONMENT	DRILL RIG	DRILLER	DATUM
DEPTHS / / / / WATER LEVEL CAVE-IN DATE-TIME NOTE DEPTHS / / / (DELAYED) WATER LEVEL CAVE-IN DATE-TIME NOTE	SAMPLER HAMMER TYPE	_WT DROP	STARTED/_ COMPLETED/_ TIMEDATE DATE

SAMPLE TYPES	<u>ABBREVIATIONS</u>	ORDER OF DESCRIPTION	NON-COHESIVE SOILS	COHESIVE SOILS
A.S. AUGER SAMPLE C.S. CHUNK SAMPLE BL BLACK BROWN D.O. DRIVE OPEN (SPT) D.S. DENISON SAMPLE F.S. FOIL SAMPLE CIN CAVE-IN P.S. PITCHER SAMPLE S.C. SOIL CORE T.D. THIN-WALLED, OPEN T.P. THIN-WALLED, PISTON W.S. WASH SAMPLE W.S. WASH SAMPLE FL FL FLAT FRAG FRAGMENT FRAG GRAVEL	HE	GROUP SYMBOL	RELATIVE DENSITY BLOWS	CONSISTENCY

* NOTE SIZ	E IGL GRAVEL PL PLA	STIC LIM						15) DENSITY						William	EE WATER W > PL C		
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Established in 1960, Golder Associates is a global, employee-owned organization that helps clients find sustainable solutions to the challenges of finite resources, energy and water supply and management, waste management, urbanization, and climate change. We provide a wide range of independent consulting, design, and construction services in our specialist areas of earth, environment, and energy. By building strong relationships and meeting the needs of clients, our people have created one of the most trusted professional services organizations in the world.

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