

# Groundwater Monitoring System Certification

Grand Haven Board of Light and Power JB Sims Generation Station 1231 North 3<sup>rd</sup> Street Grand Haven, Michigan

October 2017

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## TABLE OF CONTENTS

1.0	INTI	RODUCTION	1
	1.1	INTRODUCTION	1
	1.2	SYSTEM CERTIFICATION REQUIREMENT SUMMARY	1
2.0	SITE	SETTING	4
	2.1	SITE SETTING	4
	2.2	SITE GEOLOGY	4
3.0	MOI	NITORING SYSTEM	6
	3.1	MONITORING SYSTEM	6
	3.2	MONITORING WELL CONSTRUCTION AND PERFORMANCE	6
4.0	SYS	TEM CERTIFICATION	8
5.0	REF	ERENCES	9

# LIST OF FIGURES

- 1 Site Location Map
- 2 Monitoring Well Location Map
- 3 August 2017 Groundwater Contour Map

# LIST OF TABLES

- 1 CCR Rule Requirements and Compliance
- 2 CCR Monitoring Well Details

# LIST OF ATTACHMENTS

*A* Soil Boring and Well Construction Logs

## Certification

In accordance with the requirements of 40 CFR §257.91(f), I hereby certify that the groundwater monitoring system for the active unit at the Grand Haven Board of Light and Power - JB Sims Generating Station has been designed and constructed to meet the requirements specified in Section 257.91 of the Federal Coal Combustion Residuals (CCR) Rule. I certify that the monitoring system, consisting of one upgradient and three downgradient monitoring wells is adequate for the active unit because the wells are screened in the uppermost aquifer system and the downgradient wells are located directly downgradient of the CCR unit and adjacent to the Grand River.

I further certify that I am a duly Licensed Professional Engineer under the laws of the State of Michigan.

The P. O'all

Thomas P. O'Connell, P.E.

PE#: 6201040085

My license renewal date is 31 October 2019

The B.O'cel

## 1.0 INTRODUCTION

## 1.1 INTRODUCTION

On behalf of the Grand Haven Board of Light and Power (GHBLP), Environmental Resources Management Michigan, Inc. (ERM) prepared this report to certify that the groundwater monitoring system at the JB Sims Generation Station complies with the federal Coal Combustion Residuals (CCR) Rule (40 CFR Part 257), which went into effect on October 19, 2015.

Section 257.91 of the CCR Rule outlines the requirements of the groundwater monitoring system, including performance standards. This Certification is intended to support the certification that the groundwater monitoring system installed at the Site is in compliance with the Rule.

## 1.2 SYSTEM CERTIFICATION REQUIREMENT SUMMARY

Table 1 below provides details of the system certification requirements outlined in §257.91 of the CCR Rule and this Site's compliance with the rule.

CCR Rule Requ	irements (§257.91)	Compliance with CCR Rule
unit must insta consists of a su appropriate loc	<u>e Standard:</u> The owner or operator of a CCR lla groundwater monitoring system that fficient number of wells, installed at rations and depths, to yield groundwater he uppermost aquifer" that:	Yes. The direction of groundwater flow has been determined at the site: the
ground from a quality hydrau area w a. Hy or we	ttely represent the quality of background water that has not been affected by leakage CCR unit. A determination of background may include sampling of wells that are not ilically upgradient of the CCR management here: vdrogeologic conditions do not allow the owner operator of the CCR Unit to determine what ills are hydraulically upgradient; or mpling at other wells will provide an indication	site: the groundwater monitoring system includes the minimum number of wells at appropriate locations and depths to yield groundwater samples necessary

## Table 1. CCR Rule Requirements and Compliance

	of background groundwater quality that is	to meet
	representative or more representative than that	performance
	provided by the upgradient wells; and	standards (a)(1)
		and (a)(2)
(2)	Accurately represent the quality of groundwater	
	passing the waste boundary of the CCR unit. The	See Section 2.0
		See Section 3.0
	downgradient monitoring system must be installed at	
	the waste boundary that ensures detection of	
	groundwater contamination in the uppermost aquifer.	
	All potential contamination must be monitored.	
(1) 147 1		
	<b>1 Spacing and Site Specific Information</b> : The	
	, spacing, and depths of monitoring systems shall be	Yes. The
	ined based upon site-specific technical information	monitoring system
that mu	ist include thorough characterization of:	was designated
		based on results of
(1)	Aquifer thickness, groundwater flow rate, seasonal	technical, site-
	and temporal fluctuations in groundwater flow; and	-
		specific data,
(2)	Saturated and unsaturated geologic units and fill	including (b)(1)
(2)	8 8	and (b)(2).
	materials overlying the uppermost aquifer, materials	
	comprising the uppermost aquifer, and materials	See Sections 2.0 and
	comprising the confining unit defining the lower	3.0
	boundary of the uppermost aquifer, including, but not	0.0
	limited to, thickness, stratigraphy, lithology, hydraulic	
	conductivities, porosities, and effective porosities.	
(c) Nun	nber of Monitoring Wells: The groundwater monitoring	
	must include the minimum number of monitoring wells	Yes. One
	ry to meet the performance standards specified in	
		upgradient and
	ph (a) of this section, based on the site-specific	three downgradient
	ation specified in paragraph (b) of this section. The	wells that meet the
ground	water monitoring system must contain:	performance
		standards are being
(1)	A minimum of one upgradient and three downgradient	monitored in
	monitoring wells; and	
	0,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	compliance with
(1)	Additional monitoring wells as passage to accurately	the CCR Rule.
(2)	Additional monitoring wells as necessary to accurately	
	represent the quality of background groundwater that has	See Section 3.0
	not been affected by leakage from the CCR unit and the	
	quality of groundwater passing the waste boundary of the	
	CCR unit.	
(d) Mult	iunit Groundwater Systems: The owner or operator of	Not Applicable.
		This Site does not
	CCK units may install a multilinit groundwater monitoring	
-	CCR units may install a multiunit groundwater monitoring	
system i	nstead of separate groundwater monitoring systems for	contain multiple
-	nstead of separate groundwater monitoring systems for	contain multiple active CCR units;
system i	nstead of separate groundwater monitoring systems for	contain multiple active CCR units; therefore, the
system i	nstead of separate groundwater monitoring systems for	contain multiple active CCR units; therefore, the system does not
system i	nstead of separate groundwater monitoring systems for	contain multiple active CCR units; therefore, the
system i	nstead of separate groundwater monitoring systems for	contain multiple active CCR units; therefore, the system does not need to meet the
system i	nstead of separate groundwater monitoring systems for	contain multiple active CCR units; therefore, the system does not

(e) Monitoring Well Construction: Monitoring wells must be cased in a manner that maintains the integrity of the monitoring well borehole. This casing must be screened or perforated and packed with gravel or sand, where necessary, to enable collection of groundwater samples. The annular space (i.e. the space between the borehole and well casing) above the sampling depth must be sealed to prevent contaminating of samples and the groundwater.	Yes. Well design meets requirements of (e). See Section 3.0 Groundwater monitoring system
<ol> <li>The owner or operator of the CCR unit must document and include in the operating record the design, installation, development, and decommissioning of any monitoring wells, piezometers, and other measurements, sampling, and analytical devices. The qualified professional engineer must be given access to this documentation when completing the groundwater monitoring system certification required under paragraph (f) of this section.</li> <li>The monitoring wells, piezometers, and other measurements, sampling, and analytical devices must be operated and maintained so that they perform to the design specifications throughout the life of the monitoring program.</li> </ol>	will be operated and maintained per (e)(2).
(f) Certification: The owner or operator must obtain a certification from a qualified professional engineer stating that the groundwater monitoring system has been designed and constructed to meet the requirements of this section. If the groundwater monitoring system includes the minimum number of monitoring wells specified in paragraph (c)(1) of this section, the certification must document the basis supporting this determination.	Yes. System designed and constructed to meet the requirements of Section 257.91. Technical information to support certification and number of wells, per (c)(1). See Section 4.0 and Certifications page.

## 2.0 SITE SETTING

## 2.1 SITE SETTING

The J.B. Sims Generating Station ("Site") is a coal fired, steam-generating plant with a net capacity of approximately 70.5 megawatts. The Site is located on the southwestern portion of Harbor Island at 1231 North 3<sup>rd</sup> Street in Grand Haven, Michigan (**Figure 1**). The Grand River and South Channel of the Grand River surround Harbor Island and flow in a westerly direction to Lake Michigan which lies about one mile west of the Site.

The Site has two CCR surface impoundments (ash ponds) that are used to contain the bottom ash captured by the facility's precipitator. The impoundments are located in the northwest corner of the Site, are similar in size and are situated adjacent to each other with a common embankment between them (see **Figure 2**). According to the *Grand Haven* BLP - Ash Impoundment Evaluation (Soils & Structures, July 2016), the ponds are 175 to 190 feet long, 71 to 80 feet wide and 4 to 6 feet deep. Based on Google Earth Pro (imagery date 4/14/2016), the western edge of the west pond is about 75 feet from the banks of the Grand River.

## 2.2 SITE GEOLOGY

Based on the *Quaternary Geology of Southern Michigan* (Ferrand and Bell, 1982), the Site is located in an area of glacial sand and gravel, which consists of fine to medium sand with occasional beds of small gravel. The sands were deposited as former beach and near-offshore littoral deposits from the glacial Great Lakes. The *Hydrogeologic Atlas of Michigan* (Western Michigan University, 1981) indicates that there is 100 to 200 feeet of glacial drift in the area which is underlain by Marshall Sandstone.

Soil borings conducted in the northeast portion of the Site in 2015 showed fill material including a former trash dump and coal ash extending to a depth of up to 10 feet below ground surface (bgs). Two native depositional layers were identified underlying the trash dump: a silt loam and a fine grained native sand deposit.

Borings completed for the installation of the groundwater monitoring system wells (Attachment A) show that the dominant geology observed at

the Site in the upper 20 feet consists primarily unconsolidated fine sand with intervals of silt and blends of sand and silt. Silt or clay was encountered at the bottom of each boring and represent the confining unit beneath the ash ponds and the uppermost aquifer.

Sands in the uppermost aquifer are described as poorly-graded and wellgraded fine sand. Based on the U.S. Environmental Protection Agency (USEPA) document SW-846 – *Test Methods for Evaluating Solid Waste*, Volume 1C, Table C, poorly-graded fine sand has an estimated hydraulic conductivity of 27 feet per day and well-graded fine sand has a hydraulic conductivity of 53 feet per day.

Static water levels were measured from January through August, 2017 to determine the groundwater gradient and flow direction. The groundwater flow direction across the monitoring area was shown to consistently be in a westerly direction toward the Grand River. The flow gradient ranged from 0.0004 to 0.008.

The groundwater flow rate (seepage velocity) in the vicinity of the ash ponds was calculated using the equation:

V = Ki/n Where: V = velocity K = hydraulic conductivity I = hydraulic gradient N = porosity

Assuming an effective porosity of 30% (Driscoll, 1986), a hydraulic conductivity of 27 to 53 ft/day and hydraulic gradients from 0.0004 to 0.008 ft/day, the groundwater fow rate ranges from 0.036 to 1.41 ft/day.

#### 3.0 MONITORING SYSTEM

#### 3.1 MONITORING SYSTEM

Thee monitoring well system around the CCR unit consists of one upgradient well (MW-01) and three downgradient wells (MW-02, MW-03, and MW-04). The well locations are shown in **Figure 2**. The upgradient monitoring well is hydraulically upgradient of the CCR unit and accurately represents background groundwater quality. The downgradient monitoring wells are located hydraulically downgradient of the ash ponds. The downgradient monitoring wells are spaced approximately 100 feet apart. **Figure 3** depicts the observed groundwater flow direction based on measurements collected in August 2017.

The number, spacing, and hydraulic positions of the monitoring wells comply with requirements outlined in §257.91 (a)-(c) of the CCR Rule.

#### 3.2 MONITORING WELL CONSTRUCTION AND PERFORMANCE

Based on our understanding of the Site geology, all of the monitoring wells at the Site are screened within the uppermost aquifer. Additionally, they were constructed in a manner which complies with CCR Rule §257.91 (e). All of the monitoring wells on the Site were developed to improve clarity of the water and reduce suspended solids prior to initial baseline sampling. Supporting documentation is provided in Section 7.0 of the 10 March 2017 *Sampling and Analysis Plan*. A summary of monitoring well construction details and geospatial information is provided in Table 2 below.

ERM Michigan, Inc.

Table 2 CCR Monitoring Well Details

Well ID	(UTM) (UTM) Elevation		Top of Casing elevation	Length of Well Stick- up	Measured depth to bottom from TOC	Screened interval	
MW-01	176201.037	3847934.632	96.08	99.35	3.27	12.32	4 - 9
MW-02	176247.026	3847865.054	104.49	107.75	3.26	23.37	15 - 20
MW-03	176214.1	3847846.674	102.17	105.20	3.03	20.34	12 - 17
MW-04	176182.574	3847848.69	100.60	103.59	2.99	18.00	10 - 15

Notes

Elevation data measured from a referenced benchmark set at 100.00 feet

Benchmark set at Fire hydrant located just south of CCR ponds (ID # E150706); bolt on south side of hydrant.

Geospatial data is referenced to the Michigan South State Plane coordinate system.

Wells installed via hollow-stem-augers, constructed using 2" diameter PVC with 5' section of 0.10-slot PVC screen.

Wells installed on 1/18/2017.

## 4.0 SYSTEM CERTIFICATION

The monitoring well network is adequate and conforms to the system certification requirements outlined in §257.91 of the CCR Rule. A professionally licensed engineer has certified this network (see Certification page).

## 5.0 REFERENCES

*Driscoll,* F.G., Ph.D. <u>Groundwater and Wells</u>. Johnson Filtration Systems Inc., St. Paul, Minnesota. © 1986.

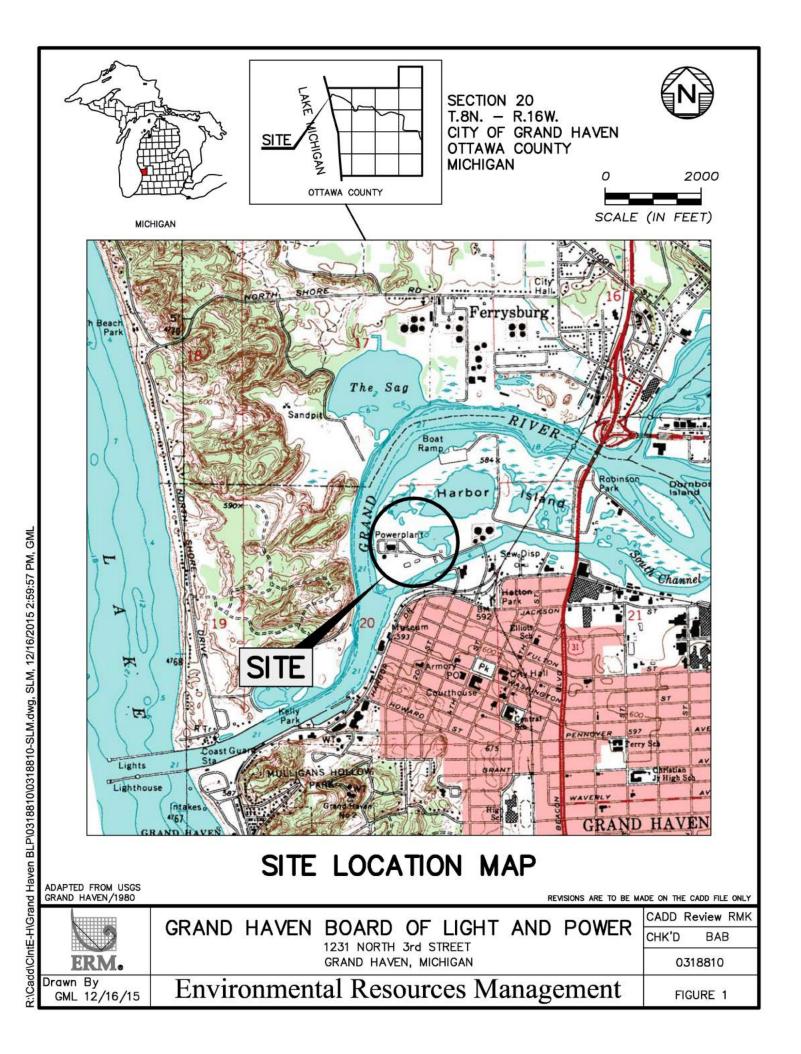
*Ferrand*, W.R., and Bell, D.L., "Quaternary Geology of Sourthern Michigan". Michigan Department of Natural Resources. Geological Publication QG-01. © 1982.

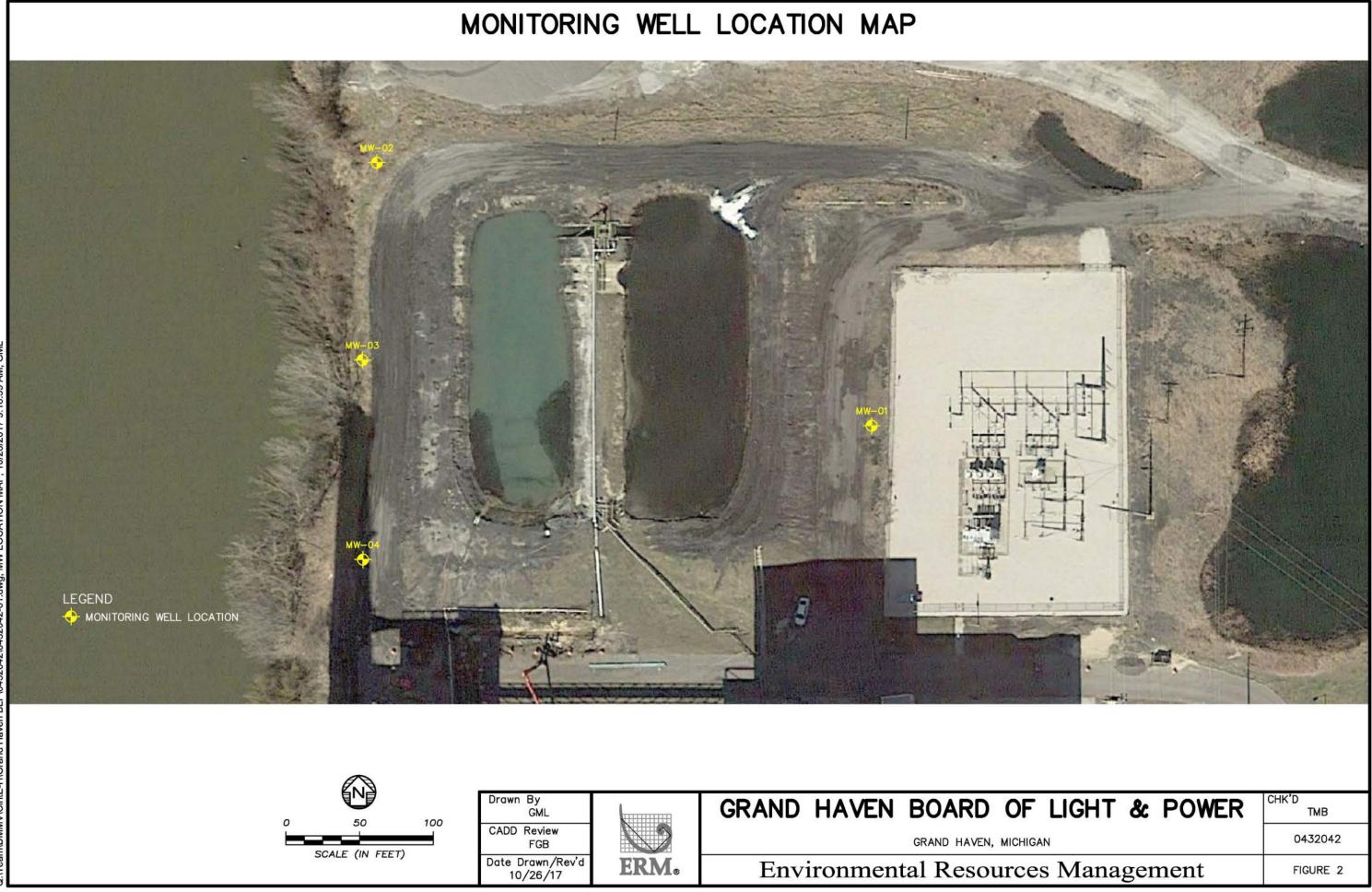
*Soils & Structures*. "Grand Haven BLP – Ash Impoundment Evaluation". Soils & Structures, July 2016.

*United States Environmental Protection Agency.* "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods". EPA Publication SW-846, Third Edition, Final Updates I (1993), II (1995), IIA (1994), IIB (1995), III (1997), IIIA (1999), IIIB (2005), IV (2008) and V (2015).

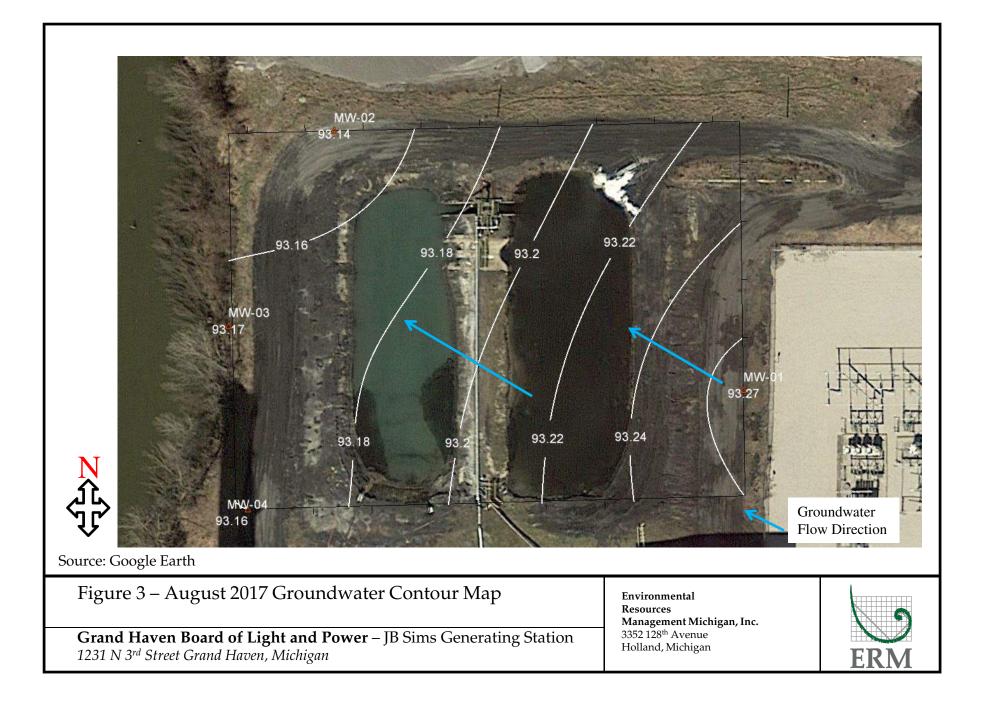
*Western Michigan University*, Department of Geology. "Hydrogeologic Atlas of Michigan, Volume 1". The Department of Geology, Kalamazoo, Michigan. © 1981.

Figures





F LIGHT & POWER	СНК'D ТМВ
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Attachment A Soil Boring and Well Construction Logs

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			G METHOD Hollow-Stem G EQUIPME T Gus Peck	Augers		FINISH				1 /18/2017			
			PHIC COORDINATES		WELL (	CONST	-				WELL		
			3 StatePlane Michigan South (US F	eet)	Rise					DE	VELOPMENT		
	Material: Schedule 40 F								C, 0.010-slot	slot Method: Overpumping			
	EASTING1702 1 . 37Diameter (ID): Coupling:2-inch Threaded							2-inch Thread		Duration: 0. Gals. Purged:30	5 hours )		
	Eleva	ation/	Top of Casing Ele 9.6.8 ft/ 99.35 ft	Well Permit	#: No perm	ni re uir	ed.						
			STRATA DE	SCRIPTIO					ÿ	WELL CC	ONSTRUCTIO		
		<u>o</u>							GRAPHIC LOG				
	Ŧ	VAT					Ŧ	S	H	Casing Ty	pe:		
	DEPTH	ELEVATIO					DEPTH	nscs	GRA	6-inch Diam Steel Stick	leter		
	_	<u> </u>	SAND (SP) poorly graded, fine graded and the graded of the	ained SAND; loose	e, little grav	vel, –			Ŭ				
	_	_	moist, dark brown to black	,	. 0	-		SP					
	_					-					×.		
	_	95	SAND (GW-SW) well graded, fine	grained SAND; lo	ose, some		1 -						
	_	_	gravel, moist, brown to grayish bro	-		E		GW-SW			Schedule	PVC	
	_	_				F					Riser		
	2	_	SAND (SP) fine grained SAND; lo	ose, moist, black,	[Bottom as	sh.] _	- 2 -						
	-	_						SP			×		
	-	_				-	2						
	-	_	SILTY SAND (SP) poorly graded,	fine grained SAN	D; loose, lit	tle –	3 -						
	_		clay, moist to wet, dark brown to b	lack, [Concrete, n	netal and w	ood							
	-	_	fragments. Wet @ 5']			L	_						
	_	_				-							
	-	_				F							
	_	-				¥							
	_	_				_							
	_	-				F							
GDT	- 6	9 —				-	_	SP					
ATE	_	9 _				_							
IMPL	-	-				-					<ul> <li>1 - slot S</li> <li>PVC Sc</li> </ul>		
TA TI	-	_				-							
M DA	_	_				_							
ER	_	-				_							
GP.	- 8	_				F	-						
ELLS	_	-				_							
SR ∨	-												
68 C	_	_	SILT (OL) soft, little clay, trace fin	a sand wet to moi	et dark		9 -			<u></u>	<u></u>		
3873	_	-	grayish brown		ot, dant	F		OL					
ЗĽР	_	_				-							
WELL CONSTRUCTION GHBLP 3873 68 CCR WELLS.GPJ ERM DATA TEMPLATE.GDT	REM	REMARKS:							N OTES:		1		
TION			data established from referenced b	enchmark set at 1	0. '.		11001/		UIES				
RUC													
LSNO													
C LL C													
NE.													

Holland, MI	Signal Action of the second se							NG # M		68	
ERM. P: 616-399-35		Grand	Haven, Mic	chigan			SHEE	T 1 OF 1			
DRILLING CO TRACTO DRILLING FOREMA DRILLING METHOD DRILLING EQUIPME T	R EDAC Holland, MI Sean Smith Hollow-Stem A Gus Peck	ugers		ERM REPRESENTATIVEBrian BeachOFFICE LOCATIOHolland, MIDATE: START1 /18/2017FINISH1 /18/2017							
GEOGRAPHIC COORDIN	ATES		WELL C	ONSTF	RUCTIC	)				VELL	
(NAD 1983 StatePlane Mic	chigan South (US Fee		Rise Schedule 4		Sahadi	Screen	, 0.010-slot	Mathadi			
O RTHING EASTING	1762 7 . 26 38 7 865. 5	Material: Diameter (ID): Coupling:	2-inc. Thread	h led		2-inch Threade		Method: Duration: Gals. Purge	0.5 ho	umping urs	
Elevation/Top of Casing El	ev1.0.9 ft/107.75 ft	Well Permit #	t: No permi	re uire	ed.						
DEPTH ELEVATIO	STRATA DES	CRIPTIO			DEPTH	nscs	GRAPHIC LOG	Casin 6-inch l	g Type: Diameter	TRUCTIO	
SILTY CLAY (( fine sand; mois fine sand; mois fine sand; mois sand; mois sand	CL) soft, little fine sar [Glass, wood, plastic CL) soft, some silt, tri- sh gray orly graded, fine graii [silt/clay stringers th CL) soft, some silt, w e sand seams throug orly graded, fine grain	rained SAND; loc ark brownish gray d, trace gravel, n debris] ace fine sand, mc ned SAND; loose, oughout.] et, dark gray to da nout] ned SAND; loose,	pse, some to black, noist, dark pist, dark gr , wet, light ark brownis		<u> </u>	CL GW-SW CL CL SP CL SP CL			Stickup	Schedule Riser	PVC
REMARKS: Elevation data established	d from referenced be	nchmark set at 10	). '.	WELL	. INSTA	ALLATION	N OTES:				

	PROJECT: Grand Haven Board of						Power		BORING # MW-03			
N	Karaka Ka				CCR Well Installation – 1231 N 3rd Street					ERM PROJECT # 38 7368		
EF	ERM. P: 616-399-35 Grand Haven, M					Chigan SHE				T 1 OF 1		
	DRILLING CO TRACTOR EDAC Holland, MI						REPRE CE LOC		IVE	Brian Beach Holland, Ml		
	DRILLING FOREMA Sean Smith DRILLING METHOD Hollow-Stem Augers						STAR			1 /18/2017		
	DRILLING EQUIPME T Gus Peck					FINISH				1 /18/2017		
						CONSTRUCTIO				WELL DEVELOPMENT		
		3 StatePlane Michigan South IG 176214.1	Material:	er Screen 40 PVC Schedule 40 PVC,				0.010-slot Method: Overpumping				
	O RTHING 176214.1 EASTING 38 7 846.67			Diameter (ID): Coupling:	ch 2-inch ded Threaded		d	Duration: 0.5 hours Gals. Purged:30				
Elev	Elevation/Top of Casing Elev1.02.17 ft/ 105.2 ft				Well Permit #: No permi re uired.							
	STRATA DESCRIPTIO				10				S LOG	WELL CONSTRUCTIO		
DEPTH	ELEVATIO				DEPTH	nscs	GRAPHIC LOG	Casing Ty 6-inch Diar Steel Stic	ype: neter xup			
_	2 1	SAND (SW) well graded, fi gravel, moist, grayish brow SAND (SW) well graded, fi gravel, moist, grayish brow SAND (SW) well graded, fi some gravel, trace clay; m [Wood fragments.] CLAYEY SILT (ML) soft, tr brown to dark brown SAND (SP) poorly graded, gray, [Wet @ 13'] SANDY SILT (OL) soft, littl dark gray to dark brownish	n, [Brick a ne grained n to dark b ne grained bist, grayis ace fine sa fine graine	SAND; loose, orown SAND; loose, brown to dark and, moist, dark ed SAND; loose ce fine sand, m	gments.] little silt, lit some silt, < brown, c grayish	tle	- 6 - - 8 - 12.75 - 1 .5 - 17 -	SW SW ML SP OL			<ul> <li>Schedule PVC Riser</li> <li>1 - slot Schedule PVC Screen</li> </ul>	
CONSTRUCTION GHBLP 387 and an and an	REMARKS: Elevation data established from referenced benchmark set at 10 . '.					WELL	. INSTA	LLATION	I OTES:			
MELL												

PROJECT: Grand Haven Board of L						Power		BOR	BORING # MW-0			
EDM	3352 128th Avenue Holland, MI 9424 P: 616-399-35	CCR Well Installation 1231 N 3rd Street Grand Haven, Michigan					ERM PROJECT # 38 7368 SHEET 1 OF 1					
DRILLIN	Ciulia	ERM REPRESENTATIVE										
DRILLIN						Brian Beach Holland, MI						
DRILLIN		OFFICE LOCATIO DATE: START				1 /18/2017						
DRILLING METHOD Hollow-Stem Augers DRILLING EQUIPME T Gus Peck					FINISH				1 /18/2017			
GEOGRAPHIC COORDINATES WELL C						RUCTIC	)		WELL			
(NAD 198	3 StatePlane Michigan South		Riser Screen					DEVELOPMENT				
O RTHIN	NG 176182.574	Material: Diameter (ID):	10 PVC Schedule 40 PVC, h 2-inch				Method: Overpumping Duration: 0.5 hours					
EASTING	G 38 7 848.69	Э	Coupling: Threaded						Gals. Purged:30			
Elevation/Top of Casing Elev10 . 60 ft/ 103.59 ft Well Permit #: No permi re uired.												
	STRATA DESCRIPTIO							Ŋ	WELL CONSTRUCTIO			
2							S	GRAPHIC LOG	Casing Type:			
DEPTH ELEVATIO						DEPTH						
DEPTH ELEVAT						DEF	nscs	GRV	6-inch Diameter Steel Stickup			
- 1 -	GRAVELLY SAND (SW) w	ell graded	, fine grained S	AND; loose	Э,			******				
	some gravel, moist, brown,	[Concrete	e fragments]		-							
2	-											
	-						SW					
	-				-		500	• • • • • • • • • • • • • • • • • • •				
	-								Schedule	PVC		
	-							• • • • • • • • • • • • • • • • • • •	Riser			
95 =						5.5 -		****				
— 6 _	GRAVELLY SAND (SP) po		-	SAND; loo	se,		SP					
	some gravel, moist, dark br				-1	6.5 7 SW		• • • • • • • • • •				
=	SAND (SW) well graded, fir			7.5 -	SC							
- 8 _	CLAYEY SAND (SC) soft, s	bist, brown		8.5 -	SW							
	SAND (SW) well graded, fir some gravel, moist, dark br		s.] / -	1	SW							
9-		-		1.5 -	.5 SP							
	wet, dark grayish brown to		-		//  -	44 5	OL					
- 12 _	[[fragments.]					11.5 -	SP					
	SAND (SP) poorly graded, grayish brown	fine graine	ed SAND; loose	e, wet, dark		12.5 -			<ul> <li>✓ 1 - slot Sc</li> <li>PVC Scre</li> </ul>			
- 1	SANDY SILT (OL) soft, mo	ist, dark g	rayish brown, [	Silt loam.]			OL					
	SAND (SP) poorly graded,	fine graine	ed SAND; loose	e, wet, gray		1.5 -						
	SANDY SILT (OL) soft, trad	ce fine sar	nd, trace clay, n	noist, dark	_/							
85 - 16 _	grayish brown, [Clay stringe (1 . 25 - 14.5).]	er (1 - 14	.25). Grey fine	sand seam			MLS					
- =	SANDY SILT (MLS) soft, lit	tle clay, m	noist, dark grayi	ish brown,		17 -						
- 18 -	[Wood fragments. Grey fine	e sand sea	am (15.75 - 16)	; (16.25 -		-						
	16.5); (16.75 - 17).]											
	-				F							
REMARKS:												
Elevation data established from referenced benchmark set at 10. '. WELL INSTALLATION OTES:												