

**ENVIRONMENTAL CONSULTANTS** 

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Mr. Tim Muehlfeld We Energies 333 W. Everett Street – A231 Milwaukee, WI 53203 November 12, 2015 (1660)

RE: 40 CFR Part 257, Subpart D, Section 257.91(f) Groundwater Monitoring System Certification We Energies Pleasant Prairie Power Plant (P4) Ash Landfill, Pleasant Prairie, WI

Dear Tim,

According to Title 40 Code of Federal Regulations (40 CFR) Part 257, Subpart D, Section 257.91(f); the owner or operator of a coal combustion residual (CCR) management unit must obtain a certification from a qualified professional engineer stating that the groundwater monitoring system at the CCR management unit has been designed and constructed to meet the requirements of Section 257.91. Further, Section 257.91 requires that the system monitor the uppermost aquifer and include a minimum of one updgradient and three downgradient monitoring wells, and that if the uppermost aquifer monitoring system includes the minimum number of wells the basis supporting use of the minimum must be documented. Also according to Section 257.91, all potential contaminant pathways must be monitored in addition to the uppermost aquifer.

A groundwater monitoring system that meets and exceeds the minimum requirements of Section 257.91 is designed for the We Energies Pleasant Prairie Power Plant (P4) Ash Landfill, including the following monitoring wells:

- <u>Upgradient</u>: W77, W20D
- Downgradient: W73, W74, W75, W76
- <u>Potential Contaminant Pathway</u>: W20B, W31B, W17BR

Provided herein, as required by Section 257.91(f), is certification from a qualified professional engineer and professional geologist that the groundwater monitoring system at We Energies P4 Ash Landfill meets the requirements of Section 257.91.

I, <u>Glenn R. Luke</u>, a qualified professional engineer, certify that the groundwater monitoring system at We Energies P4 Ash Landfill has been designed and constructed to meet the requirements set forth in Section 257.91 of the United States Environmental Protection Agency's Final Rule to Regulate the Disposal of Coal Combustion Residuals from Electric Utilities as Solid Waste under Subtitle D of the Resource Conservation and Recovery Act. This certification is based on review of documentation regarding the design, installation, development, and decommissioning of monitoring wells and piezometers and ancillary measurement, sampling, and analytical devices.

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Glenn R. Luke, PE Professional Engineer No. 42834-6 State of Wisconsin

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I, Jacob J. Walczak, a qualified professional geologist, certify that the groundwater monitoring system at We Energies P4 Ash Landfill has been designed and constructed to meet the requirements set forth in Section 257.91 of the United States Environmental Protection Agency's Final Rule to Regulate the Disposal of Coal Combustion Residuals from Electric Utilities as Solid Waste under Subtitle D of the Resource Conservation and Recovery Act. This certification is based on review of documentation regarding the design, installation, development, and decommissioning of monitoring wells and piezometers and ancillary measurement, sampling, and analytical devices.

Jacob J. Walczak, PG Professional Geologist No. 1328-13 State of Wisconsin

Please don't hesitate to contact us if you have any questions.

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.

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Glenn R. Luke, PE Project Manager

[1660 We Energies Monitoring System Certification - P4 Ash Landfill 151112]

Jacob J. Walczak, PG Hydrogeologist