SCS ENGINEERS

July 31, 2020 File No. 27219426.00

Mr. Brian Trower
Assistant Director – Electric Department
Ames Municipal Electric System
502 Carroll Avenue
Ames, Iowa 50010

Subject: 2019-2020 Annual Groundwater Monitoring and Corrective Action Report

Coal Combustion Residuals (CCR) Inactive Surface Impoundment

Dear Mr. Trower

On behalf of the City of Ames Municipal Electric System, SCS Engineers (SCS) is submitting this 2019-2020 Annual Groundwater Monitoring and Corrective Action Report for the Ames Municipal Electric System Inactive Coal Combustion Residuals (CCR) Surface Impoundment (Impoundment).

If you have any questions regarding this document, please contact the undersigned. $\label{eq:contact}$

Sincerely,

Matthew D. Cahalan Staff Scientist

SCS Engineers (515) 631-6152

mcahalan@scsengineers.com

Christine L. Collier, P.E. Senior Project Manager SCS Engineers

misting L Collier

(515) 631-6161

ccollier@scsengineers.com

2019-2020 Annual Groundwater Monitoring and Corrective Action Report



City of Ames Municipal Electric System 502 Carrol Avenue Ames, Iowa 50010

SCS ENGINEERS

27219426.00 | July 31, 2020

8450 Hickman Road, Suite 27 Clive, Iowa 50325 515-631-6160

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1.0 INTRODUCTION

This 2019-2020 Annual Groundwater Monitoring and Corrective Action Report was prepared to support compliance with the groundwater monitoring requirements of the "Coal Combustion Residuals (CCR) Final Rule" (Rule) published by the United States Environmental Protection Agency (USEPA) on April 17, 2015, with an update published August 5, 2016, to provide an extension of compliance deadlines for certain inactive surface impoundments. The City of Ames Municipal Electric System CCR Ash Impoundment (Impoundment) is classified as an "inactive" CCR unit and is therefore regulated by the August 5, 2016, update to the Rule subject to the new language of 40 CFR 257.100(e). Owners and operators of inactive CCR surface impoundments subject to the provisions of the new 40 CFR 257.100(e)(5)(ii) were required to prepare an annual groundwater monitoring and corrective action report no later than August 1, 2019, and annually thereafter per 40 CFR 257.90(e).

Specifically, this report was prepared to fulfill the requirements of 40 CFR 257.90(e). Changes to the text of 40 CFR 257.90(e) based on the new 40 CFR 257.100(e) are shown in [brackets]. The applicable sections of the Rule are provided below in italics, followed by applicable information relative to the 2019-2020 Annual Groundwater Monitoring and Corrective Action Report for the City of Ames Municipal Electric System Inactive CCR Ash Impoundment.

2.0 §257.90(E) ANNUAL REPORT REQUIREMENTS

Annual groundwater monitoring and corrective action report. For [inactive] CCR surface impoundments, no later than [August 1, 2019], and annually thereafter, the owner or operator must prepare an annual groundwater monitoring and corrective action report. For [inactive] CCR surface impoundments, the owner or operator must prepare the initial annual groundwater monitoring and corrective action report no later than [August 1] of the year following the calendar year a groundwater monitoring system has been established for such CCR unit as required by this subpart, and annually thereafter. For the preceding calendar year, the annual report must document the status of the groundwater monitoring and corrective action program for the CCR unit, summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and project key activities for the upcoming year. For purposes of this section, the owner or operator has prepared the annual report when the report is placed in the facility's operating record as required by §257.105(h)(1). At a minimum, the annual groundwater monitoring and corrective action report must contain the following information, to the extent available:

2.1 §257.90(E)(1) SITE MAP

A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit;

A site map with an aerial image showing the Impoundment and background (or upgradient) and downgradient monitoring wells with identification numbers for the Impoundment groundwater monitoring program is provided as **Figure 1** in **Appendix A**.

2.2 §257.90(E)(2) MONITORING SYSTEM CHANGES

Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;

The Impoundment groundwater monitoring system was initially certified on April 15, 2019. No new monitoring wells were installed and no wells were decommissioned as part of the Impoundment groundwater monitoring program during this reporting period.

2.3 §257.90(E)(3) SUMMARY OF SAMPLING EVENTS

In addition to all the monitoring data obtained under §§ 257.90 through 257.98, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs;

The sampling events during this reporting period are included in Table 1 below.

Date of Sample Monitoring **Monitoring Points Sampled** Parameter List Program Detection August 1, 2019 MW-104 Boron, Calcium, Chloride, Sulfate, TDS MW-106 Fluoride October 9, 2019 Assessment MW-101, MW-102, MW-103, MW-104, Appendix IV MW-105, MW-106, MW-107, MW-108 April 15, 2020 MW-101, MW-102, MW-103, MW-104, Appendix IV Assessment MW-105, MW-106, MW-107, MW-108 May 28, 2020 Assessment MW-101, MW-102, MW-103, MW-104, Appendix III+ MW-105, MW-106, MW-107, MW-108

Table 1. 2019-2020 Sampling Event Summary

Note: Appendix III+ denotes a sample was collected and analyzed for the Appendix III parameters plus those that were detected during the previous Appendix IV sample events.

The August 1, 2019, resampling event samples from MW-104 and MW-106 were analyzed for the Appendix III constituents which were identified as unverified statistically significant increases (SSIs) from the April 12, 2019, detection monitoring sampling event. Assessment monitoring sampling began on October 9, 2019, following the identification of verified SSIs from the resampling event statistical analyses. The October 9, 2019, and April 15, 2020, assessment monitoring samples were analyzed for Appendix IV monitoring constituents at each Impoundment groundwater monitoring network well. The May 28, 2020, assessment monitoring samples were analyzed for Appendix III monitoring constituents and those Appendix IV monitoring constituents detected during the April 15, 2020, assessment monitoring event on an individual well basis.

The Appendix III and Appendix IV monitoring constituents are specified in both 40 CFR 257 and in Table 3 of the April 16, 2019, City of Ames CCR Groundwater Monitoring Sampling and Analysis Program report. An analytical data summary table is included in **Appendix B Table B-1**. The field data are summarized in **Appendix B Table B-2**.

2.4 §257.90(E)(4) MONITORING TRANSITION NARRATIVE

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); and

The Impoundment groundwater monitoring program transitioned from detection monitoring to assessment monitoring following the identification of verified SSIs at MW-104 (boron, calcium, chloride, sulfate, and total dissolved solids) from the August 1, 2019, resampling event. Assessment monitoring sampling began on October 9, 2019. Assessment monitoring sampling is currently ongoing at the Impoundment.

2.5 §257.90(E)(5) OTHER REQUIREMENTS

Other information required to be included in the annual report as specified in §§ 257.90 through 257.98.

A summary of potentially required information and the corresponding section of the Rule is provided in the following sections.

2.5.1 §257.90(E)

...For the preceding calendar year, the annual report must document the status of the groundwater monitoring and corrective action program for the CCR unit, summarize key actions completed, describe any problems encountered, discuss actions to resolve the problems, and project key activities for the upcoming year...

Status of Groundwater Monitoring and Corrective Action Program for the CCR Unit.

The groundwater monitoring and corrective action program for the Impoundment is currently in assessment monitoring.

Summary of Key Actions Completed.

Detection monitoring resampling was completed on August 1, 2019. Statistical evaluation of the resampling event data identified five confirmed SSIs at MW-104, resulting in assessment monitoring program initiation, and the subsequent completion of three assessment monitoring sampling events in October 2019, April 2020, and May 2020. Statistical evaluation of the assessment monitoring data identified various Appendix III and/or Appendix IV SSIs from each of the three assessment monitoring sampling events. None of the SSIs exceeded their respective groundwater protection standards, which means an assessment of corrective measures and subsequent corrective action are not required for the Impoundment at this time.

Description of Any Problems Encountered.

No noteworthy problems were reported associated with the collection and laboratory analysis of groundwater samples and statistical evaluation of groundwater analytical data over the reporting period.

Discussion of Actions to Resolve the Problems.

Not applicable because no noteworthy problems were encountered.

Projection of Key Activities for the Upcoming Year (August 2020- July 2021).

Semiannual assessment monitoring groundwater sampling, analysis, and statistical evaluation will continue during the fall and spring of the upcoming reporting year. Verification sampling and alternative source demonstration(s) will be completed, if required.

2.5.2 §257.94(D)(3)

Demonstration providing the basis for an alternative monitoring frequency for detection monitoring and certification that it meets the requirements of this section.

Not applicable because no alternative monitoring frequency for detection monitoring and certification was pursued.

2.5.3 §257.94(E)(2)

Demonstration that an alternative source other than the CCR unit caused the statistically significant increase (SSI) over background or that the SSI was caused by an error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. In addition, certification of the demonstration is to be included in the annual report.

Not applicable because no such demonstration was warranted.

2.5.4 §257.95(B)

Within 90 days of triggering an assessment monitoring program, and annually thereafter, the owner or operator of the CCR unit must sample and analyze the groundwater for all constituents listed in appendix IV to this part.

The assessment monitoring program was triggered on August 15, 2019, when analytical results from the August 1, 2019, resampling event were received and statistical analyses identifying SSIs were conducted. The first assessment monitoring sampling event, in which all Impoundment groundwater monitoring network wells were sampled and analyzed for Appendix IV constituents, was conducted within 90 days on October 9, 2019.

2.5.5 §257.95(C)(3)

Demonstration providing the basis for an alternative monitoring frequency for assessment monitoring and certification that it meets the requirements of this section.

Not applicable because no alternative monitoring frequency for assessment monitoring and certification was pursued.

2.5.6 §257.95(D)(1)

Within 90 days of obtaining the results [from the initial and subsequent sampling events required in §257.95(B)], and on at least a semiannual basis thereafter, resample all wells that were installed pursuant to the requirements of §257.91, conduct analyses for all parameters in appendix III to this part and for those constituents in appendix IV to this part that are detected in response to §257.95(B), and record their concentrations in the facility operating record.

The samples collected during the May 28, 2020, assessment monitoring sampling event were analyzed for all Appendix III constituents and those monitoring well-specific Appendix IV constituents detected during the April 15, 2020 assessment monitoring sampling event.

2.5.7 §257.95(D)(3)

Include the concentrations of Appendix III and detected Appendix IV constituents from the assessment monitoring, the established background concentrations, and the established groundwater protection standards.

Concentrations of Appendix III and Appendix IV constituents reported during this reporting period and established groundwater protection standards are included in **Appendix B Table B-1.** Concentrations of Appendix III and Appendix IV constituents reported during the previous reporting year (2018-2019) are included in the 2018-2019 Annual Groundwater Monitoring and Corrective Action Report for the Impoundment.

2.5.8 §257.95(F)

If the concentrations of any constituent in appendices III and IV to this part are above background values, but all concentrations are below the groundwater protection standard established under §257.95(H), using the statistical procedures in §257.93(g), the owner or operator must continue assessment monitoring in accordance with this section.

The Appendix III and Appendix IV constituents which were detected above background values during this reporting period were below their respective groundwater protection standards. Thus, the Impoundment will continue assessment monitoring.

2.5.9 §257.95(G)(3)(ii)

Demonstration that an alternative source other than the CCR unit caused the contamination, or that the SSI (during assessment monitoring) resulted from an error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. In addition, certification of the demonstration is to be included in the annual report.

Not applicable because no such demonstration was warranted.

2.5.10 §257.96(A)

Demonstration of the need for additional time to complete the assessment of corrective measures due to site-specific conditions or circumstances. In addition, certification of the demonstration is to be included in the annual report.

Not applicable because no such demonstration was warranted.

3.0 GENERAL COMMENTS

This report has been prepared and reviewed under the direction of a qualified groundwater scientist and qualified professional engineer. The information contained in this report is a reflection of the conditions encountered at the City of Ames Municipal Electric System Inactive CCR Surface Impoundment at the time of fieldwork. This report includes a review and compilation of the required information and does not reflect any variations of the subsurface, which may occur between sampling locations. Actual subsurface conditions may vary and the extent of such variations may not become evident without further investigation.

Conclusions drawn by others from the result of this work should recognize the limitation of the methods used. Please note that SCS Engineers does not warrant the work of regulatory agencies or other third parties supplying information used in the assimilation of this report. This report is prepared in accordance with generally accepted environmental engineering and geological practices, within the constraints of the client's directives. It is intended for the exclusive use of the City of Ames Municipal Electric Systems for specific application to the Inactive CCR Surface Impoundment. No warranties, express or implied, are intended or made.

Appendix A

Figure 1: Site Map

Appendix B

Tables

Table B-1: Groundwater Monitoring Analytical Laboratory Results

Table B-2: Groundwater Monitoring Field Measurements

Table B-1
Inactive CCR Surface Impoundment
Appendix III and Appendix IV Detection and Assessment Monitoring Analytical Laboratory Groundwater Sample Results
City of Ames Municipal Electric System

Monitoring Well Number		Appendix III Constituents						Appendix IV Constituents															
	Sample Date	Boron mg/L	Calcium mg/L	Chloride mg/L	Fluoride mg/L	pH S.U.	Sulfate mg/L	Total Dissolved Solids mg/L	Antimony mg/L	Arsenic mg/L	Barium mg/L	Beryllium mg/L	Cadmium mg/L	Chromium mg/L	Cobalt mg/L	Fluoride mg/L	Lead mg/L	Lithium mg/L	Mercury mg/L	Molybdenum mg/L	Selenium mg/L	Thallium mg/L	Combined Radium 226 + 228 pCi/L
		IIIg/L	IIIg/L	IIIg/L	mg/ L	3.0.	mg/L	IIIg/L	IIIg/L	mg/L	IIIg/L	IIIg/L	IIIg/L	IIIg/L	IIIg/L	IIIg/L	mg/L	IIIg/L	IIIg/L	IIIg/L	IIIg/L	IIIg/L	рсі/ Е
Groundwater Standa		NA	NA	NA	4.0	NA	NA	NA	0.006	0.01	2.0	0.004	0.005	0.1	0.00899	4.0	0.015	0.04	0.002	0.1	0.05	0.002	5
	8/1/2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	10/9/2019	-	-	-	< 0.50	-	-	-	< 0.001	<0.002	0.10	< 0.001	< 0.0001	<0.005	< 0.0005	< 0.50	< 0.0005	< 0.01	< 0.0002	<0.002	0.011	< 0.001	0.505
MW-101	4/15/2020	-	-	-	< 0.50	-	-	-	< 0.001	<0.002	0.11	< 0.001	< 0.0001	<0.005	< 0.0005	< 0.50	< 0.0005	< 0.01	<0.0002	< 0.002	0.012	< 0.001	0.255 U
	5/28/2020	0.111	91.7	22.9	< 0.50	7.6 HF	44.4	388	-	-	0.11	-	-		-	< 0.50	-	-	-	=	0.010	-	0.576
MW-102	8/1/2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	10/9/2019	-	-	-	< 0.50	-	-	=	< 0.001	<0.002	0.07	< 0.001	< 0.0001	<0.005	< 0.0005	< 0.50	< 0.0005	< 0.01	<0.0002	< 0.002	< 0.005	< 0.001	0.631
	4/15/2020	-	-	-	< 0.50	-	-	=	< 0.001	<0.002	0.07	< 0.001	< 0.0001	<0.005	< 0.0005	< 0.50	<0.0005	< 0.01	< 0.0002	< 0.002	< 0.005	< 0.001	-0.184 U
	5/28/2020	0.114	92.6	10.3	< 0.50	7.5 HF	20.5	372	-	-	0.08	-	-		-	< 0.50	-	-	-	=	-	-	0.399 U
	8/1/2019	-	-	-	-	-	-	=	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MW-103	10/9/2019	-	-	-	0.57	-	-	-	< 0.001	<0.002	0.07	< 0.001	< 0.0001	<0.005	< 0.0005	0.57	< 0.0005	0.02	<0.0002	0.014	< 0.005	< 0.001	0.770
IVIW-103	4/15/2020	-	-	-	< 0.50	-	-	-	< 0.001	<0.002	0.03	< 0.001	< 0.0001	<0.005	< 0.0005	< 0.50	< 0.0005	< 0.01	<0.0002	< 0.002	0.006	< 0.001	0.521
	5/28/2020	0.127	93.9	37.3	< 0.50	7.7 HF	86.2	460	-	-	0.02	-	-		-	< 0.50	-	-	-	=	0.007	-	0.581 U
	8/1/2019	0.814	347	245	-	-	738 F1	1670	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MW-104	10/9/2019	-	-	-	0.60	-	-	=	< 0.001	<0.002	0.04	< 0.001	0.0001	<0.005	0.0008	0.60	<0.0005	0.02	< 0.0002	0.050	< 0.005	< 0.001	0.940
10100-104	4/15/2020	-	-	-	0.52	-	-	=	< 0.001	<0.002	0.04	< 0.001	< 0.0001	<0.005	0.0007	0.52	< 0.0005	0.02	<0.0002	0.070	< 0.005	< 0.001	0.107 U
	5/28/2020	0.872	276	258	< 0.50	7.4 HF	751	1530	-	-	0.04	-	-	1	0.0006	< 0.50	-	0.02	-	0.056	-	1	0.701
	8/1/2019	-	-	-	-	-	-	=	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MW-105	10/9/2019	-	-	-	0.63	-	-	-	< 0.001	0.009	0.09	< 0.001	< 0.0001	<0.005	0.0069	0.63	< 0.0005	0.03	<0.0002	0.026	< 0.005	< 0.001	0.960
IVIVV-103	4/15/2020	-	-	-	0.93	-	-	=	< 0.001	0.010	0.07	< 0.001	< 0.0001	<0.005	0.0016	0.93	< 0.0005	0.03	<0.0002	0.053	<0.005 ^	< 0.001	0.708
	5/28/2020	0.495	250	279	0.90	7.5 HF	635	1430	-	0.003	0.06	-	-	1	0.0014	0.90	-	0.03	-	0.060	-	1	1.130
	8/1/2019	-	-	-	< 0.50	-	-	=	-	-	-	-	-	-	-	< 0.50	-	-	-	-	-	-	-
MW-106	10/9/2019	-	-	-	0.54	-	-	=	< 0.001	0.002	0.04	< 0.001	< 0.0001	<0.005	0.0011	0.54	<0.0005	0.02	< 0.0002	0.027	< 0.005	< 0.001	1.100
ININA-100	4/15/2020	-	-	-	< 0.50	-	-	=	< 0.001	0.002	0.05	< 0.001	< 0.0001	<0.005	0.0014	< 0.50	< 0.0005	0.02	<0.0002	0.008	<0.005 ^	< 0.001	0.714
	5/28/2020	0.327	166	166	0.57	7.5 HF	372	1030	-	0.002	0.06	-	-	1	0.0015	0.57	-	0.02	-	0.018	-	1	0.561 U
MW-107	8/1/2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	10/9/2019	-	-	-	0.86	-	-	=	< 0.001	<0.002	0.07	< 0.001	0.0001	<0.005	0.0006	0.86	0.0006	0.02	<0.0002	0.014	< 0.005	< 0.001	0.866
IVI VV - 107	4/15/2020	-	-	-	0.89	-	-	=	< 0.001	<0.002	0.08	< 0.001	0.0001	<0.005	0.0008	0.89	0.0006	0.02	<0.0002	0.016	<0.005 ^	< 0.001	1.430
	5/28/2020	0.308	127	127	1.14	7.5 HF	300	806	-	-	0.06	-	<0.0001	1	0.0005	1.14	<0.0005	0.02	-	0.044	-	-	0.411 U
	8/1/2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MANA/ 100	10/9/2019	=	-	-	< 0.50	-	=.	-	< 0.001	<0.002	0.09	< 0.001	< 0.0001	<0.005	< 0.0005	< 0.50	< 0.0005	< 0.01	< 0.0002	0.034	< 0.005	< 0.001	0.949
MW-108	4/15/2020	=	-	-	< 0.50	-	-	=	< 0.001	<0.002	0.12	< 0.001	<0.0001	<0.005	0.0006	< 0.50	<0.0005	0.01	<0.0002	0.003	<0.005 ^	< 0.001	1.200
	5/28/2020	0.104	88.4	19.7	<0.50	7.6 HF	88.7	442	-	-	0.10	-	-	-	<0.0005	<0.50	-	0.01	-	0.007	-	-	1.110

Notes:

NA: not applicable

mg/L: miligrams per liter

S.U.: Standard Units

pCi/L: Picouries per liter

HF: field parameter with a holding time of 15 minutes. Test performed by laboratory at client's request. Field pH is included in Table B-2.

[&]quot;-" represents no data

U: result is less than the sample detection limit for radiochemistry analyses.

^{^:} instrument related quality contol sample (e.g., continuing calibration verification [CCV]) is outside acceptance limits.

Table B-2
Inactive CCR Surface Impoundment
Detection and Assessment Monitoring Groundwater Sample Field Measurements
City of Ames Municipal Electric System

Monitoring Well Number	Sample Date	рН	Specific Conductivity	Temperature	Turbidity	Groundwater Level	Groundwater Elevation ft amsl		
		S.U.	μs/cm	°C	NTU	ft btoc			
	8/1/2019	-	-	-	-	-	-		
MW-101	10/9/2019	7.21	713	12.90	0.0	21.81	878.64		
10100-101	4/15/2020	7.36	607	10.00	12.9	22.15	878.30		
	5/28/2020	6.12	706	11.40	33.1	20.49	879.96		
	8/1/2019	-	-	-	-	-	-		
MW-102	10/9/2019	7.14	699	13.30	1.1	21.20	878.64		
10100-102	4/15/2020	7.37	592	9.20	4.1	21.72	878.12		
	5/28/2020	6.33	699	10.70	10.7	19.72	880.12		
	8/1/2019	-	-	-	-	-	-		
NAVA (402	10/9/2019	7.25	1,720	13.10	0.00	21.76	878.77		
MW-103	4/15/2020	7.43	758	9.90	1.9	22.51	878.02		
	5/28/2020	6.47	777	10.90	5.6	20.16	880.37		
	8/1/2019	7.29	2,350	15.90	12.5	22.97	877.18		
	10/9/2019	7.20	2,250	15.80	13.0	21.51	878.64		
MW-104	4/15/2020	7.27	1,984	11.80	4.40	22.51	877.64		
	5/28/2020	6.43	2,181	12.80	11.8	19.57	880.58		
	8/1/2019	-	-	-	-	-	-		
NAVA / 405	10/9/2019	7.10	1,890	15.30	>1000	21.92	878.55		
MW-105	4/15/2020	7.37	1,906	10.90	>1000	23.23	877.24		
	5/28/2020	6.57	2,101	11.20	8.0	19.93	880.54		
	8/1/2019	7.42	1,250	18.00	12.2	23.96	877.02		
NAVA (400	10/9/2019	7.36	1,190	16.10	0.0	22.39	878.59		
MW-106	4/15/2020	7.26	1,294	7.90	4.2	23.48	877.50		
	5/28/2020	6.57	1,557	12.10	3.7	20.72	880.26		
	8/1/2019	-	-	-	-	-	-		
101/407	10/9/2019	7.09	1,600	15.90	27.2	22.05	878.30		
MW-107	4/15/2020	7.02	1,490	10.20	18.6	22.75	877.60		
	5/28/2020	6.73	1,280	12.70	34.0	20.62	879.73		
	8/1/2019	-	-	-	-	-	-		
NAVA 400	10/9/2019	7.78	948	15.00	27.2	23.21	878.19		
MW-108	4/15/2020	7.44	657	10.50	84.7	23.64	877.76		
	5/28/2020	6.49	739	12.20	48.7	21.96	879.44		

Notes:

S.U.: Standard Units

 $\mu s/cm$: microsiemens per centimeter

°C: degrees Celsius

NTU: nephelometric turbidity units ft btoc: feet below top of [well] casing ft amsl: feet above mean sea level

"-" represents no data