Marion Power Plant – Emery Pond

2019 Annual Groundwater Monitoring and Corrective Action Report

Marion Power Plant Southern Illinois Power Cooperative Marion, Williamson County, Illinois





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Acronyms and Abbreviations

- CCR Coal Combustion Residuals
- CFR Code of Federal Regulations
- DTW Depth to Water (from measuring point)
- Elev. Elevation (in North American Vertical Datum 1988)
- GPS Groundwater Protection Standard
- Hanson Hanson Professional Services Inc.
- MCL Maximum Contaminant Level
- Plant Marion Power Plant
- SIPC Southern Illinois Power Cooperative
- SSI Statistically Significant Increase
- USEPA United States Environmental Protection Agency

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1. Introduction

Hanson prepared this groundwater monitoring and corrective action plan report for the Southern Illinois Power Cooperative Marion Power Plant. This report was prepared in accordance with the "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments" Title 40 CFR, Part 257, aka "the Rule". The Rule regulates the disposal of CCR produced by electric generating facilities.

The Marion Plant is situated on the northwestern shoreline of Lake of Egypt, south of Marion, Illinois in Williamson County. The Marion Plant has been in operation since 1963, and utilizes Lake of Egypt for cooling and other fresh water needs. The Emery Pond is an on-site settling pond, approximately one (1) acre in size that is subject to the Rule. Precipitator, air heater, boiler and scrubber CCR material is intermittently managed in the pond.

This report summarizes the activities related to the Rule during 2019. In accordance with the Rule, the owner or operator of an existing CCR unit must prepare an annual groundwater monitoring and corrective action report for the preceding calendar year. The report summarizes activities completed, any problems encountered, discusses corrective actions to the problems and discusses activities for the upcoming year. At a minimum, the report should contain the following information, to the extent available:

- 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.
- 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.
- In addition to all the monitoring data obtained under 40 CFR 257.90 through 257.98, a summary including the number of groundwater samples that were collected for analysis at 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 an SSI over background levels).
- Other information required to be included in the annual report as specified in 40 CFR 257.90 through 257.98.

2. 2019 Activities Summary

The Emery Pond has five groundwater monitoring wells (AECOM, 2017). One upgradient (background) well, EBG, and four detection monitoring wells, EP-1, EP-2, EP-3, and EP-4 (see Figure 1). No modifications to the existing monitoring program were performed and no needed changes were identified.

Assessment Monitoring continued at Emery Pond in 2019 for the SSIs identified in 2018 (Hanson, 2019).



2.1 Groundwater Flow

Depth to water measurements were taken prior to collecting a sample at each well. A potentiometric surface map was created to confirm groundwater flow direction. A summary of groundwater measured elevations is included in Table 1 and groundwater flow maps for each event are included in Appendix B.

Sample Event Well ID	EBG	EP-1	EP-2	EP-3	EP-4
January 11, 2019 DTW	8.1	6.0	5.0	17.2	11.5
January 11, 2019 Elev.	516.77	513.72	508.79	501.75	508.24
June 27, 2019 DTW	7.3	5.7	6.0	15.6	9.0
June 27, 2019 Elev.	517.57	514.02	507.79	503.35	510.74

Table 1. Groundwater Depths and Elevations
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Generally, groundwater flow is in a northeasterly direction for the two 2019 sampling events.

2.2 Sampling Results

Previously, a notice of assessment monitoring was placed in the operating record on August 8, 2018 (SIPC, 2018) due to the SSIs identified at that time. For 2019, the results of the first semi-annual sampling event continued to show several SSIs in the downgradient monitoring wells (see gray highlights for the January 11 sampling event in the Analytical Results Table in Appendix A).

Assessment Monitoring samples (40 CFR 257, Appendix III and Appendix IV) were collected on June 27, 2019. The 40 CFR 257 Appendix III samples continued to show the SSIs observed in the January 2019 sampling event. The 40 CFR 257, Appendix IV parameters were exceeded at two monitoring wells. EP-3 exceeded background for total Arsenic and background and GPS for total Cobalt, and EP-4 exceeded background and GPSs for total Arsenic and total Cobalt.

2.3 Problems Encountered and Resolutions

No additional problems were encountered during the 2019 reporting period.

3. Actions Planned for 2020

SIPC will continue to conduct Detection Monitoring sampling during the first semi-annual event in 2020 and add the parameters that exceeded the GPS during the 2019 Assessment Monitoring event. The samples that will be collected and analyzed for are listed in Table 2.

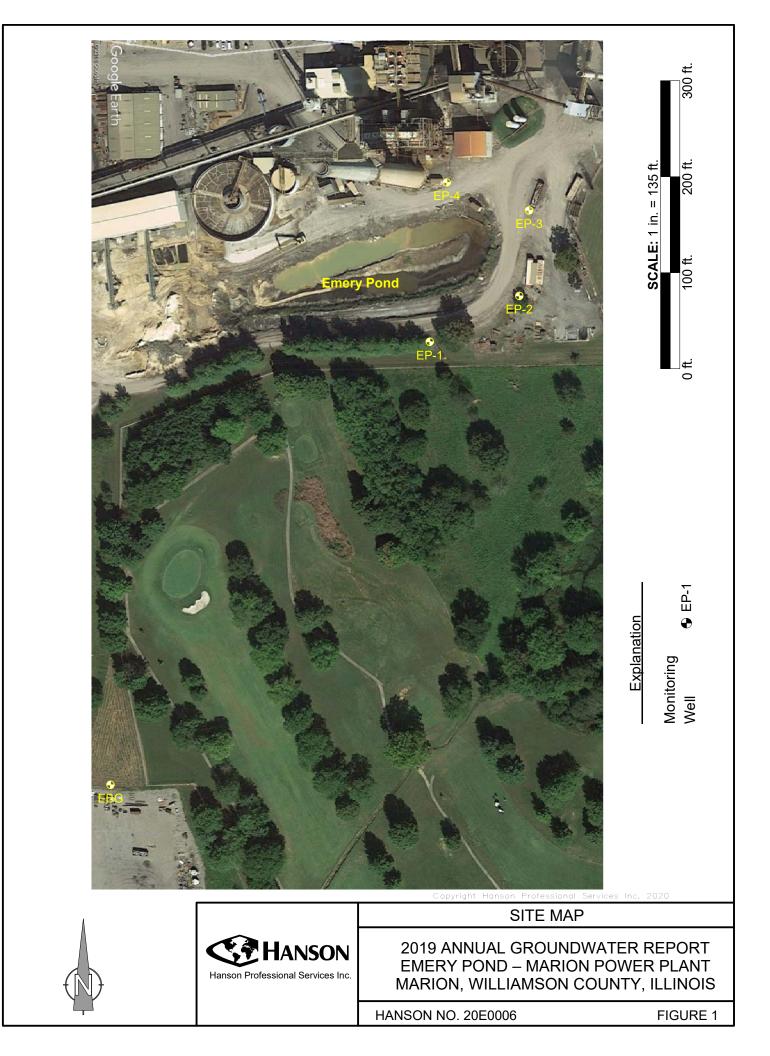
Parameter Well ID	EBG	EP-1	EP-2	EP-3	EP-4
Appendix III parameters	Х	х	х	х	Х
Arsenic, total				х	х
Cobalt, total				Х	х

The second semi-annual event will have samples collected for both Appendix III and Appendix IV lists at the five (5) monitoring wells.



4. References

- AECOM, 2017. "Draft Monitoring Well Installation Report Coal Combustion Residuals (CCR) Rule", Marion Power Plant. September 28, 2017.
- Hanson, 2019. "2018 Annual Groundwater Monitoring and Corrective Action Report", Hanson Professional Services Inc., Springfield, IL. January 25, 2019.
- SIPC, 2018. "Assessment Monitoring Program Notification Emery Pond Monitoring Wells", Southern Illinois Power Cooperative, Marion, IL. 1 p.





Appendix A

Analytical Results



Appendix A. Analytical Results Table for 2019 SIPC Marion Power Plant – Emery Pond

Sampling Date				1/11/2019					6/27/2019				
Reporting Date				6/4/2019					7/30/2019				
PARAMETER NAME	UNITS	Bkgd. Std.	GPS	EBG	EP-1	EP-2	EP-3	EP-4	EBG	EP-1	EP-2	EP-3	EP-4
Detection Monitoring List (App. III)													
Boron	mg/L	0.1216	0.1216	0.041	0.73	0.35	<0.1	12.	<0.04	1.12	0.274	<0.04	11.5
Calcium	mg/L	46.304	46.304	13.	390.	280.	62.	140.	15.2	444.	236.	76.3	159.
Chloride	mg/L	118.63	118.63	12.	70.	25.	160.	420.	18.	55.	29.	150.	440.
Fluoride	mg/L	0.64	4.	<0.5	<0.5	<0.5	<0.5	<0.5	<0.06	<0.06	<0.06	<3.	<0.06
pH	SU	6.11 - 6.94	6.11 - 6.94	6.85	6.33	6.62	6.11	6.07	6.21	6.2	6.18	5.98	5.86
Sulfate	mg/L	68.606	68.606	74.	1600.	1100.	220.	740.	77.	1500.	1100.	160.	710.
Temperature	deg C	n/a	n/a	8.9	13.9	13.5	17.2	16.	19.8	16.6	18.7	19.6	19.4
Total Dissolved Solids	mg/L	550.58	550.58	350.	2800.	1900.	1300.	2000.	470.	550.	400.	580.	130.
Assessment Monitoring List (App. IV)													
Antimony	ug/L	5.	6.	•	•	•	•	•	<1.6	<1.6	<1.6	<1.6	<1.6
Arsenic	ug/L	5.	10.	1.2	<5.	<1.	6.8	14.	<2.	<2.	<2.	5.7	26.
Barium	ug/L	249.13	2000.	64.	<10.	<10.	36.	24.	<0.11	<0.11	<0.11	<0.11	<0.11
Beryllium	ug/L	5.	5.	•	•	•	•	•	<0.15	<0.15	<0.15	<0.15	<0.15
Cadmium	ug/L	10.	10.	•	•	•	•	•	<0.018	<0.018	<0.018	<0.018	<0.018
Chromium	ug/L	10.	100.	•	•	•	•	•	<0.14	<0.14	<0.14	<0.14	<0.14
Cobalt	ug/L	19.0812	19.0812	3.8	0.37	0.48	63.	390.	<0.63	<0.63	<0.63	32.	280.
Lead	ug/L	10.	15.	•	•	•	•	•	<0.16	<0.16	<0.16	<0.16	<0.16
Lithium	ug/L	100.	100.	•	•	•	•	•	<0.04	<0.04	<0.04	0.119	<0.04
Mercury	ug/L	0.2	2.	<0.2	<0.2	<0.2	<0.2	<0.2	<0.1	<0.1	<0.1	<0.1	<0.1
Molybdenum	ug/L	5.	100.	•	•	•	•	•	<0.28	<0.28	<0.28	<0.28	<0.28
Radium 226	pCi/L	1.2076	n/a	•	•	•	•	•	0.703	0.619	-0.149	0.0839	0.77
Radium 226 Uncertainty	pCi/L	n/a	n/a	•	•	•	•	•	0.29	0.292	0.231	0.145	0.423
Radium 228	pCi/L	2.9745	n/a	•	•	•	•	•	0.911	0.0905	0.553	0.477	0.929
Radium 228 Uncertainty	pCi/L	n/a	n/a	٠	•	•	•	•	0.429	0.334	0.385	0.297	0.353
Radium 226 + Radium 228	pCi/L	4.0038	5.	٠	•	•	•	•	1.614	0.7095	0.404	0.5609	1.699
Selenium	ug/L	7.	50.	0.68	<5.	6.	0.72	<5.	<0.33	<0.33	<0.33	<0.33	<0.33
Thallium	ug/L	50.	50.	<50.	<50.	<50.	<50.	97.	<0.15	<0.15	<0.15	<0.15	<0.15

Upgradient monitoring well =

EBG

EP-3

5.

140.

140.

6.1

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Detection monitoring well =

Background GW Quality Standard =

Concentration above Background =

Concentration above GPS =

pH value within meter accuracy of ± 0.1 SU =

Not required per 40 CFR 257.95(d)(1) =

Groundwater Protection Standards (GPS):

MCL from 40 CFR 141.61 and .66 = 10.

MCL from July 30, 2018 rulemaking = 40.

10.

Background concentration per 257.95(h)(3) =



Appendix B

Potentiometric Surface Maps



