## **GROUNDWATER MONITORING SYSTEM CERTIFICATION**

# NEW FGD POND WILLIAMS STATION GOOSE CREEK, SOUTH CAROLINA

**Prepared For:** 

# DOMINION ENERGY SOUTH CAROLINA, INC. COLUMBIA, SOUTH CAROLINA

**Prepared By:** 

# CIVIL & ENVIRONMENTAL CONSULTANTS, INC. PITTSBURGH, PENNSYLVANIA

CEC Project 306-309

MAY 2021



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#### **1.0 INTRODUCTION**

### **1.1 OBJECTIVE**

This report has been prepared for South Carolina Generating Company (SCGENCO) and Dominion Energy South Carolina, Inc. (DESC) to demonstrate that the A.M. Williams Station (Williams Station) Coal Combustion Residuals (CCR) Unit described as the New FGD Pond meets the requirements of the United States Environmental Protection Agency (USEPA) CCR Rule which was published in the Federal Register (FR) on April 17, 2015 as part of the Code of Federal Regulations (CFR) Title 40, Part 257 (§257). Specifically, this report demonstrates the requirements for a Groundwater Monitoring System as defined in §257.91 are met for the New FGD Pond.

#### 2.0 SITE OVERVIEW

#### 2.1 BACKGROUND

The Williams Station is a coal-fired power generation station located at 2242 Bushy Park Road in Goose Creek, South Carolina (refer to Figure 1) that is owned by SCGENCO and operated by DESC. The 650 MW coal-fired electric generating station is generally positioned within a small strip of lowlands between meanders of the Back River (west) and the Cooper River (east) as depicted on Figure 2. The station property is bound by Bushy Park Road to the west and tidal wetlands and/or lowlands border the remainder of the property. The Williams Station wastewater management impoundment complex, comprised of six interconnected separate ponds labeled Ponds A through E and the Coal Pile Runoff Pond, is located north of main station structures (refer to Figure 3).

Williams Station infrastructure includes a flue gas desulfurization (FGD) air quality control system that produces an FGD wastewater blowdown waste stream that is managed in an on-site FGD Pond that was originally constructed in 2009 in accordance with applicable South Carolina Department of Health and Environmental Control (SCDHEC) regulations and permits. This CCR Unit is also regulated as a CCR Surface Impoundment per Title 40 CFR, Part 257, Subpart D published in April 2015 (CCR Rule) by the USEPA and subsequent revisions.

### 2.2 NEW CCR UNIT

The CCR Rule Location Restrictions compliance demonstration for the original FGD Pond dated October 2018, reported that the Williams Station FGD Pond did not satisfy the requirements of §257.63(a) – Seismic Impact Zones. As the FGD Pond is a critical operational component to Williams Station's ability to produce electricity and there were no other technically feasible onsite or off-site options to manage the FGD blowdown wastewater, DESC elected to continue operation of the FGD Pond in accordance with the alternative closure requirements identified in §257.103. Subsequently, DESC determined that the fastest technically feasible pathway to compliance was to open a new CCR impoundment within the footprint of the originally

constructed FGD Pond that meets the CCR Rule's seismic impact zone location and liner design criteria. This action required a structural improvement to the FGD Pond perimeter dikes, closure of the currently operating FGD Pond in accordance with §257.102 and §257.103 for existing CCR surface impoundments, and then opening a new pond (identified as the New FGD Pond) within the original pond footprint in accordance with the CCR Rule. The perimeter dikes were structurally improved by installing Deep Soil Mix (DSM) columns through and below the perimeter dikes surrounding the FGD Pond. The New FGD Pond, located in the footprint of the previously closed FGD Pond is compliant with the Location Restrictions defined in §257.60 through §257.64 of the CCR Rule.

## 2.3 DESCRIPTION OF THE NEW CCR UNIT

The FGD Pond is located within the boundaries of the wastewater management impoundment complex at the Williams Station facility and was originally constructed within the footprint of former Pond C in 2009. Figures 2 and 3 depict the location of the New FGD Pond in relation to Williams Station and the wastewater management impoundment complex, respectively. The New FGD Pond occupies essentially the same footprint as the former FGD Pond and is comprised of two approximate 700,000 gallon forebays (identified as Forebay 1 and Forebay 2) and approximately two acres in total.

The only waste stream to be placed in the New FGD Pond is wet FGD blowdown from the FGD system. The FGD blowdown contains residual gypsum solids that are discharged from the secondary hydrocyclone overflows and pumped to the operating forebay of the New FGD Pond. Each FGD forebay allows the gypsum solids to settle and provide temporary storage until removed, dewatered, and disposed in the Williams Station Highway 52 Landfill. A solids removal treatment system (i.e., Lamella clarifier with one filter press) is used to remove solids prior to discharge to the New FGD Pond. The New FGD Pond is permitted to receive approximately 0.319 million gallons a day (MGD) of wastewater which is the same as the former FGD Pond. The New FGD Pond discharges to Pond D which flows into Pond E and then to the National Pollutant Discharge

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Elimination System (NPDES) permitted outfall in accordance with SCDHEC NPDES Permit SC0003883 (effective January 1, 2017).

## 2.4 GEOLOGIC SETTING

Williams Station is located on the lower Coastal Plain, north of the where the Back River and the Cooper River meet. The geology generally consists of fine sands and clays, interbedded with marine deposits. The area is dominated by tidal marsh deposits of clays and occasional peat deposits and clayey sand and clay facies of the Ten Mile Beds. Underlying these materials is the Cooper Marl Formation (CMF). The CMF is a well-studied, over-consolidated sandy silt to clayey silt. The CMF was encountered between 26 and 30 feet below existing grade at this site. This unit is approximately 200 feet thick and functions as an aquitard. Underlying the "Cooper Marl" is a limestone aquifer. Sedimentary rocks in this area sit over 2,000 ft. above a crystalline rock formation associated with the Piedmont (F&ME, 2017).

## 2.5 HYDROGEOLOGIC SETTING

Groundwater flow direction, average hydraulic gradient, and average interstitial flow velocity at Williams Station FGD Pond were derived from water-level measurements recorded in March 2019 and the results of slug tests conducted at the CCR Rule compliance monitoring wells in May 2016 and January 2017. The direction of shallow groundwater flow in the vicinity of the FGD Pond is generally west to east, which is consistent with previous delineations of groundwater flow direction at the site. Water levels in the ponds surrounding the FGD Pond are typically varied as part of normal operations and exert short-term influences on the direction of groundwater flow in the surficial aquifer. This information is confirmed in the *Analysis of Groundwater Flow Direction* Report prepared by Nautilus Geologic Consulting, PLLC, (NGC) in 2017.

The direction of groundwater flow in the surficial aquifer has been delineated numerous times over many years based on groundwater gauging data at monitoring wells used for NPDES compliance monitoring associated with the site wastewater ponds. Typically, the delineated direction of

groundwater flow in the surficial aquifer in the area of the wastewater ponds (including the New FGD Pond) is to the northeast, east and southeast toward the tidal wetlands bordering the area.

## 3.0 CRITERIA FOR THE GROUNDWATER MONITORING SYSTEM §257.91

The applicable sections of §257.91 are presented below in bold, italic font. The responses follow each section of the rule and are provided in normal font.

## 3.1 PERFORMANCE STANDARD (§257.91(A))

(a) Performance standard. The owner or operator of a CCR unit must install a groundwater monitoring system that consists of a sufficient number of wells, installed at appropriate locations and depths, to yield groundwater samples from the uppermost aquifer that:

(1) Accurately represent the quality of background groundwater that has not been affected by leakage from a CCR unit. A determination of background quality may include sampling of wells that are not hydraulically upgradient of the CCR management area where:

(i) Hydrogeologic conditions do not allow the owner or operator of the CCR unit to determine what wells are hydraulically upgradient; or

(ii) Sampling at other wells will provide an indication of background groundwater quality that is as representative or more representative than that provided by the upgradient wells; and

(2) Accurately represent the quality of groundwater passing the waste boundary of the CCR unit. The downgradient monitoring system must be installed at the waste boundary that ensures detection of groundwater contamination in the uppermost aquifer. All potential contaminant pathways must be monitored.

As will be discussed in Section 3.2, the groundwater monitoring system meets the Performance Standard described in §257.91(a). It consists of a sufficient number of wells at appropriate locations and depths to provide groundwater samples from the uppermost aquifer that accurately represents background groundwater quality that has not been affected by leakage from the CCR unit and accurately represents the quality of groundwater passing the waste boundary of the CCR unit.

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### **3.2** SYSTEM DESIGN (§257.91(B) THROUGH §257.91(E))

(b) The number, spacing, and depths of monitoring systems shall be determined based upon site-specific technical information that must include thorough characterization of:

(1) Aquifer thickness, groundwater flow rate, groundwater flow direction including seasonal and temporal fluctuations in groundwater flow; and

(2) Saturated and unsaturated geologic units and fill materials overlying the uppermost aquifer, materials comprising the uppermost aquifer, and materials comprising the confining unit defining the lower boundary of the uppermost aquifer, including, but not limited to, thicknesses, stratigraphy, lithology, hydraulic conductivities, porosities and effective porosities.

(c) The groundwater monitoring system must include the minimum number of monitoring wells necessary to meet the performance standards specified in paragraph (a) of this section, based on the site-specific information specified in paragraph (b) of this section. The groundwater monitoring system must contain:

(1) A minimum of one upgradient and three downgradient monitoring wells; and

(2) Additional monitoring wells as necessary to accurately represent the quality of background groundwater that has not been affected by leakage from the CCR unit and the quality of groundwater passing the waste boundary of the CCR unit.

(d) The owner or operator of multiple CCR units may install a multiunit groundwater monitoring system instead of separate groundwater monitoring systems for each CCR unit.

(1) The multiunit groundwater monitoring system must be equally as capable of detecting monitored constituents at the waste boundary of the CCR unit as the individual groundwater monitoring system specified in paragraphs (a) through (c) of this section for each CCR unit based on the following factors:

(i) Number, spacing, and orientation of each CCR unit;

(ii) Hydrogeologic setting;

(iii) Site history; and

(iv) Engineering design of the CCR unit.

(e) 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 contamination of samples and the groundwater.

(1) 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 measurement, 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.

(2) The monitoring wells, piezometers, and other measurement, sampling, and analytical devices must be operated and maintained so that they perform to the design specifications throughout the life of the monitoring program.

There are numerous monitoring wells around the New FGD Pond that were installed for past and on-going investigations. The use of the six (6) PVC-cased wells with 0.010-slot screens, listed below, will be used to meet the CCR Rule groundwater monitoring performance standard. These monitoring wells are cased in a manner that maintains the integrity of the monitoring well borehole and include a sand-packed screen to enable collection of groundwater samples. The locations described below are consistent with the monitoring network associated with the previous FGD Pond. The integrity of interior well construction as well as the hydraulic conductivity and groundwater chemistry were evaluated before and after DSM construction to ensure the original groundwater monitoring network was not damaged by the stabilization efforts. No noticeable change to the well integrity was observed after DSM construction; and, therefore the groundwater monitoring network for the new FGD Pond remains consistent with the previous network.

The well locations are shown on Figure 4. Table 1 summarizes all wells that are included as the CCR Rule Groundwater Monitoring System. Boring and well construction logs are provided in Appendix A.

Location	<b>Relative Location</b>	Well Diameter (in.)	Bottom of Screen (ft-bgs)	Screen Length (ft)
MW-FGD-16	Upgradient	2	15.0	10
MW-FGD-17	Downgradient	2	18.0	10
MW-FGD-18	Downgradient	2	18.0	10
MW-FGD-19D	Downgradient	2	28.0	10
MW-FGD-20AR	Downgradient	2	20.0	10
MW-FGD-21	Upgradient	2	18.0	10

TABLE 1. CCR RULE GROUNDWATER MONITORING SYSTEM

Additionally, MW-FGD-19 will be utilized for groundwater elevation measurements. This well does not produce enough groundwater volume to obtain a sample, however it is useful for interpreting groundwater movement around the New FGD Pond.

Supporting information associated with the groundwater monitoring system for the New FGD Pond can be found in the following reports, available in the operating record:

- Groundwater Sampling and Analysis Plan (NCG, 2016)
- Groundwater Monitoring Well Installation Report (NCG, 2017(1))
- Analysis of Groundwater Flow Rate and Direction (NCG, 2017(2))

CEC has reviewed these documents and compared the relevant information to the New FGD Pond conditions. Because the New FGD Pond is located within the footprint of the original FGD Pond without modification to the pond configuration or surrounding topography/land use, the previously demonstrated compliance with the requirements in 40 CFR §257.91(b) through (d) remain applicable; and therefore, CEC certifies the Groundwater Monitoring System described in Section 3.0 for the New FGD Pond.

# 3.3 OBTAIN CERTIFICATION (§257.91(F))

(f) The owner or operator must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority 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.

A written certification from a qualified professional engineer licensed in South Carolina is provided in Section 4.0.

## **3.4 RECORD KEEPING REQUIREMENTS §257.91(G)**

(g) The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in §257.105(h), the notification requirements specified in §257.106(h), and the internet requirements specified in §257.107(h).

A record of the certification must be placed in the facility's operating record [\$257.105(h)] and the publicly accessible internet site [\$257.107(h)] and the state must be notified [\$257.106(h)] that the information is available.

#### 4.0 GROUNDWATER MONITORING CERTIFICATION

By means of this certification, I certify that I have reviewed this Groundwater Monitoring System, New FGD Pond, Williams Station meets the requirements of Section 40 CFR 257.91.

			UTH CAROLINE
Scott L. Brown, P.E.			ENVIRONMENTAL CONSULTANTS INC
Printed Name of Profession	nal Engineer		No. 4888
Scoll 2 5	3		THE OF AUTHORITIE
Signature			No. 25687
25687	South Carolina	5-7-21	SOC NAM
Registration No.	Registration State	Date	BRUNNIN L. BRUNNIN

By means of this certification, I certify that I have reviewed this Groundwater Monitoring System, New FGD Pond, Williams Station meets the requirements of Section 40 CFR 257.91.

Donald M. Cobb, P.G. Printed Name of Professional Geologist M. M. ( ONA /////IIIIIII Signature 2621 South Carolina 5-7-21 Registration No. **Registration State** Date

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#### 5.0 REFERENCES

- F&ME, 2017. Location Restriction for CCR Ponds, PowerAdvocate Event 67204:EA0003(2017), Prepared for SCANA Corporation, Cayce, SC, Prepared by F&ME Consultants, Inc., Submitted October 2017.
- NGC, 2016. Groundwater Sampling and Analysis Plan EPA CCR Rule Compliance Monitoring Wells, Williams Generating Station FGD Pond C, Prepared for South Carolina Electric & Gas Company, Cayce, SC, Prepared by Nautilus Geologic Consulting, PLLC, Submitted May 2016 and Revised December 2016.
- NGC, 2017 (1). Groundwater Monitoring Well Installation Report EPA CCR Rule Compliance Monitoring Wells, Prepared for South Carolina Electric & Gas Company, Cayce, SC, Prepared by Nautilus Geologic Consulting, PLLC, Submitted July 2016 and Revised January 2017.
- NGC, 2017 (2). Analysis of Groundwater Flow Rate and Direction: July 2017 Monitoring Data EPA CCR Rule Compliance Monitoring Wells, Prepared for South Carolina Electric & Gas Company, Cayce, SC, Prepared by Nautilus Geologic Consulting, PLLC, Submitted September 2017.

# FIGURES



Signature on File





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# APPENDIX A

# **CCR RULE BORING LOGS**





GARRETT	Well ID			
Engineering for the Power and Waste	Industries	FGD P	GW-18	
Date Started: 4/5/2016 Date Completed: 4/5/2016 Drilling Method: 4.25" ID Sampling Method: Geopro Drilling Company: S&ME	6 6 9 Hollow Stem Augers be	R GroundwaterLogged By:SBLocated By:SCANANorthing:0Easting:0GS Elev.:0	Wonitoring Wells Well Co ToC Elev.: Screen Int. (ft, BGS) Seal (ft, BGS): Completion:	S Page1 of 1 onstruction Record Edit-Text ):8.0-18.0 4.0-6.0 Flush Mount
ti b ti B B C Profile		Description	w	ell Diagram
	SW: FILL - ROADI CL: SANDY CLAY plastic, tan/brown, CL: SANDY CLAY to medium plastic f CL: SANDY CLAY 25%, medium to hi lense of gravelly w	BASE (FILL): fine to medium sand, 1 moist, with trace organics 4-4.5 (FILL): fine to medium sand to fines, brown/black/orange, mois : mostly fine sand with variable igh plastic fines, blue, moist/we hite fine to coarse sand (shells) CLAY: fine sand to 15%, blue, m /wet.	15-20%, low         20-25%, low         st.         content 10-         t. With 1"         ).	Conc. Pad Grout 2" PVC Bentonite Sand Screen

GARRETT	SCE&G Willia	ams Station	Well ID
Engineering for the Power and Waste Industries	FGD r	Monitoring Wells	GW-19
Date Started: 4/5/2016 Date Completed: 4/5/2016 Drilling Method: 4.25" ID Hollow Stem Sampling Method: Geoprobe Drilling Company: S&ME	Augers Logged By: SB Located By: SCANA Northing: 0 Easting: 0 GS Elev.: 0	Well Constr           ToC Elev.:         Edi           Screen Int. (ft, BGS): 8.0-           Seal (ft, BGS):         4.0-           Completion:         Flu	Page1 of 1 ruction Record t-Text 18.0 6.0 sh Mount
, fi a o Profile	Description	Well D	iagram
0-0 CL: SAND 10-20%, lo CL: SAND plastic fine CL: SAND plastic fine CL: SAND plastic fine CL: SAND plastic fine	Y SILTY CLAY (FILL): fine to medium w plastic fines, Y CLAY (FILL): fine to medium sand to s, brown/grey, moist to wet. Y CLAY: mostly fine sand to 40-50%, i n/orange/grey/green, moist to wet.	sand varying	Conc. Pad Grout 2" PVC Bentonite

				PROJECT:	We	ell ID	):					
				Williams Station	G	<b>W</b> -′	19D					
	Na	utilus	Geologic	LOCATION:	C	Client:						
	Co	nsultin	g, PLĪC	Goose Creek, SC DRILLING CONTRACTOR:			SCE&G					
	11112	Branding	Iron PI				HING:	EASTING:				
	Wend	ell, NC 27	591	Red Dog Drilling		342	54.04	2328550.03				
919-366-3663 (Office)				DRILLING EQUIPMENT:	GR	OUN	ND SURFACE ELEV.:	TOC ELEVATION:				
	919-98 nautili	95-0363 (C USGEOCON	en) @gmail.com	CME 45C	12	2.5		12.56				
	naatin	aogoooon	eginanooni	DRILLING METHOD:	ТО	TAL	. DEPTH:	DEPTH TO WATER:				
				Hollow stem auger	3	0						
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۲. (f	lsc	raph Log		Description	U U		Well Co	nstruction				
Ele		Ū			2	#	*					
12 -			Sandy Silty CLA	AY (FILL): little fine to medium sand; little silt;				Finished within steel, flush				
			low plastic fines	5.				mount, bolt down well				
10 -	CL							protector.				
8 -			Sandy CLAY (F	ILL): little fine to medium sand; low plastic	_							
			fines; brown/gra	ay; moist to wet				2" ID Sch 40 PVC solid riser.				
6 -	CL											
4 -			Sandy CLAY: s brown/orange/g	ome fine sand; low plastic fines; (ray/green; moist to wet.								
· -			0.0					Grout				
2 -												
<u> </u>												
0 -												
-	CL											
-2 -												
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-	CL		Sinty CLAT. Inte	ttle te come very fine te medium cond. little	18	5						
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-			sorted sand; so	me silt; tan-brown; wet; saturated.	y	-						
-12 -	SM				18	4		No. 2 Sand Filter Pack				
-												
-14 -												
-			Silty Sandy CLA	AY: calcareous; little silt; trace very fine to fine	•							
-16 -	CL		sanu, plastic, ol	ive-brown, Cooper Man.								
-					18	6						
-18												
NOT	ES: Des	scriptions fror	n 0-20' depth take	en from drilling log for GW-19.								

				PROJECT:			Well ID:					
				Williams Station	M	MW-FGD-20A						
	Na	nutilus	Geologic	LOCATION:	C	Client:						
	Co	nsultin	ng, PLLC	Goose Creek, SC	S	CE8	kG					
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	919-3	95-0363 (C	ell)				ID SURFACE ELEV.:	TOC ELEVATION:				
	nautil	usgeocon	@gmail.com					0.99				
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-10 -	CL				18\	фон,	,1					
- 1						-		2" ID Sch 40 PVC 0.010" machine slotted well				
-11 -								screen.				
-12 -												
-												
-13 -			Sandy SILT: ca partially indurate	lcareous; some f-c, poorly sorted sand; ed calcareous fragments to approx 1.5"								
-14 -	SM		diameter; litte to	o tr clay; gray-green; wet.		+						
_15 _					18	6						
-10 -	CL		Silty Sandy CLA	AY: some vt-t sand; calcareous, partially ; hard; olive-brown; Cooper Marl.		-						
-10				· · ·	1	1						
NOT	IES:											

				PROJECT:	We	ell ID:					
				Williams Station	G	GW-21					
	Na	utilus	Geologic	LOCATION:	C	Client: SCE&G					
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11112 Branding Iron PI Wendell, NC 27591 919-366-3663 (Office)				DRILLING CONTRACTOR:				EASTING:			
							D SURFACE ELEV ·				
	919-99	95-0363 (C	ell)	CME 45C				13.8			
	nautil	usgeocon	@gmail.com	DRILLING METHOD:	то	TAL I	DEPTH:	DEPTH TO WATER			
				Hollow stem auger	20	)					
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Bria	n S. Bo	outin, PG		2-foot split spoon every 5 feet	1'	1/14/	/16	11/14/16			
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14 -	-							Einisten die Maria			
13 -								stick-up well protector with			
12 -	-							hinged, locking lid.			
11 -	-		Silty CLAY: little	e to some silt; plastic; brown.				2" ID Sch 40 PVC solid			
10 -	-							riser.			
9 -	CL										
- 8	-							Grout			
	-				16	11					
-	-		Sandy SILT: litt	le very fine to fine sand; tr clay; gr-black.		11		Bentonite seal			
6 -	м										
5 -											
4 -	-		Silty CLAY: little	e to some silt; plastic; mottled gr-or-br.	-						
3 -											
2 -	CL				9	9					
1 -	-				-						
0 -	-		Sandy SILT: so	me very fine to med sand; very loose in upper	-			No. 2 Sand Filter Pack			
-1 -	-		part of section; section to olive	wet; saturated; or-light br in upper part of green-br in lower part of section; becomes							
-2 -	-		calcareous and pieces up to 0.2	partially indurated with depth with cemented 25" diameter.							
-3 -	4				15	2					
-4 -								2" ID Sch 40 PVC 0.010" machine slotted well			
- -	ML							scieen.			
-5 -	-										
-0 - - -											
-/ -	-				10	-					
-8 -	-				18	7					
-9	1										
NOT	I IES <sup>.</sup>				1	<u> </u>					