CCR Removal Report

Supplement No. 3

Former B.C. Cobb Power Plant
Bottom Ash Pond and Ponds 0-8

December 7, 2023

Prepared for:
Muskegon Environmental Redevelopment Group, LLC (MERG)
Muskegon, Michigan

Prepared by:
HDR MICHIGAN, Inc.
1000 Oakbrook Drive, Suite 200
Ann Arbor, Michigan 48104

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1 Introduction and Purpose

HDR MICHIGAN, Inc. (HDR) has prepared this Supplement No. 3 of the CCR Removal Report for Bottom Ash Pond and Ponds 0-8 at the Former B.C. Cobb Power Plant (B.C. Cobb) in Muskegon, Michigan. The CCR Removal Report (Ref. [2]) was submitted on September 19, 2022 to Muskegon Environmental Redevelopment Group, LLC (MERG) and ultimately Michigan Department of Environment, Great Lakes, and Energy (EGLE) for review and approval. Additionally, Supplement No. 1 of the CCR Removal Report (Ref. [3]) was submitted on December 7, 2022 and Supplement No. 2 of the CCR Removal Report (Ref. [4]) was submitted on June 8, 2023.

In January 2023, MERG recognized sloughing on the interior slope of the North Embankment of the impoundment, likely due to wind/wave action during storm events. In addition to the sloughing along the North Embankment, minor sloughing was observed on the western and southern perimeter embankments. MERG promptly began slope reinforcement repairs of the perimeter embankments, and those repairs were completed in July 2023. As part of the slope repairs, the excavation was partially dewatered and MERG performed additional excavation in the areas adjacent to the embankment sloughing to remove any potential CCR contamination that could have come from the embankment material. HDR performed reverification adjacent to the North Embankment and those results are presented in Supplement No. 2 (Ref. [4]), dated June 8, 2023, to the CCR Removal Documentation Report. Additionally, HDR visually observed the other areas of sloughing along the perimeter embankment and visually confirmed that CCR was not present at other areas of the excavation footprint and the results in the previous CCR Removal Documentation Report remained valid.

Through discussion with EGLE, a supplemental reverification was performed in the area adjacent to the Western and Southern Perimeter Embankments. A separate grid node system was developed for this reverification area and approved by EGLE[1]. The sample nodes within this reverification area are referred to as the X-series nodes. The sample node locations where resampling was performed as part of the reverification presented herein are shown on Figure 1.

2 CCR Removal Verification

The CCR removal procedures were implemented in accordance with the Closure Work Plan (Ref. [1]). Further details on lines of evidence for CCR removal and site information are presented in the CCR Removal Report (Ref. [2]).

A separate grid system was developed for the reverification area presented herein, per direction from EGLE. Consistent with EGLE Sampling Strategies and Statistics Training Materials for Part 201 Cleanup Criteria (S3TM), a 30-foot grid was established across the verification area (15-ft offset from the edge of the excavation footprint along the toe of the western and southern perimeter embankments) as shown on Figure 1. According to the

[1] K. Walters (EGLE), e-mail communication on file with EGLE, October 18, 2023.

S3TM guidance, the verification area is considered a medium site (i.e., between 10,890 and 130,680 square feet). Equation 1 provides the calculation for the grid internal in accordance with S3TM, which calculated a grid interval of 30 feet:

Equation 1

$$\frac{\sqrt{A/\pi}}{4} = GI$$

where:

- A = area to be grid (ft2) = 44,100 ft^2
- GI = grid interval = 29.6 feet

The 30-ft grid, overlain on the new area of verification, identified a total of forty-seven (47) grid nodes.

The resampling of the B-series nodes followed the Standard Operating Procedures presented in Attachment A of the CCR Removal Report (Ref. [2]). The following paragraphs detail the reassessment of the X-series sample nodes and confirmation of meeting the three lines of evidence of CCR removal.

The field visit to sample the X-series sample nodes was performed on November 2, 2023. An Observation Report summarizing the field visit is presented in Attachment A.

The excavation has been inundated with water since excavation was completed. Water depths in areas of the sample nodes at the time of the field visit ranged from approximately 2-4 feet. HDR field personnel accessed the X-series node locations and collected the samples using sample extension devices as planned and approved by EGLE[2]. HDR field personnel entered the water using chest waders with the aid of a small boat to hold equipment and samples. The locations were identified using a handheld GPS and the field personnel then collected the samples using the extension device. The sample depths collected were from approximately 0- to 6-inches below existing grade at the time of the field visit. The X-series nodes consists of forty-seven (47) nodes designated as X1 through X47 in order to distinguish the node information collected herein from the previous nodes. The following subsections detail the sample processing and the results of the lines of evidence required at each X-series node.

2.1 First Line of Evidence - Documentation of Excavation Grades

The first line of evidence to verify CCR removal was to confirm that excavations extended to at least the elevations established in the Closure Work Plan (Ref. [1]). Documentation of Excavation Grades for this reverification area has already been completed during the original verification efforts and submitted in the original CCR Removal Report (Ref. [2]). Considering the information provided from previous survey and previous site visits, the X-series nodes meet the requirement of the first line of evidence of the Closure Work Plan (Ref. [1]).

[2] K. Walters (EGLE), e-mail communication on file with EGLE, October 18, 2023.

2.2 Second Line of Evidence - Photographic Documentation

The second line of evidence to verify CCR removal was photographic documentation at the sample node locations. Photographic documentation of twenty-four (24) sample nodes were performed in accordance with the Standard Operating Procedures presented in Attachment A of the CCR Removal Report (Ref. [1]). Due to the current standing water at each of the sample nodes, in-place photographs were not feasible using the standard methods. Similar to the procedures performed in Supplement No. 1 of the CCR Removal Report (Ref. [3]) and Supplement No. 2 of the CCR Removal Report (Ref. [4]), material was sampled at twenty-four (24) sample nodes, brought to shore, drained of water, placed on a dish, and photographed with a whiteboard identifier as presented in Attachment B.

2.3 Third Line of Evidence - Microscopic Quantification

The third line of evidence to verify CCR removal at the X-series sample nodes was microscopic quantification. Microscopic quantification was conducted at 50% of the photographic nodes to verify that the samples contained more or less than the 5 percent CCR threshold established in the Closure Work Plan (Ref. [1]). The microscopic quantification procedures performed for the sub-node samples collected from 0- to 6-inches below existing grade, presented herein, are in accordance with the procedures established in the CCR Removal Report (Ref. [2]). Example photographs taken during the microscopic quantification by HDR for the X-series nodes are included in Attachment C.

Table 1 provides a summary of the microscopic quantification of the X-series nodes.

Table 1. Summary of Microscopic Quantification Results

Sub-Node ID	Date Sampled	Northing (feet)	Easting (feet)	HDR Microscopic Estimation of CCR (%)	HDR Microscopy Pass/Fail (< 5%)
X6	11/2/2023	647188.1	12622450.6	<1%	Pass
X12	11/2/2023	646888.1	12622240.6	<1%	Pass
X13	11/2/2023	646828.1	12622210.6	1-2%	Pass
X18	11/2/2023	646498.1	12622120.6	1-2%	Pass
X19	11/2/2023	646468.1	12622120.6	<1%	Pass
X21	11/2/2023	646318.1	12622210.6	1-2%	Pass
X23	11/2/2023	646288.1	12622360.6	2-3%	Pass
X25	11/2/2023	646288.1	12622420.6	<1%	Pass
X29	11/2/2023	646258.1	12622720.6	1%	Pass
X32	11/2/2023	646198.1	12622930.6	1-2%	Pass

Sub-Node ID	Date Sampled	Northing (feet)	Easting (feet)	HDR Microscopic Estimation of CCR (%)	HDR Microscopy Pass/Fail (< 5%)
X37	11/2/2023	646078.1	12623170.6	<1%	Pass
X47	11/2/2023	645568.1	12623470.6	<1%	Pass

3 Summary

In January 2023, MERG recognized sloughing on the interior slope of the North Embankment of the impoundment. In addition to the sloughing along the North Embankment, minor sloughing was observed on the Western and Southern perimeter embankments. MERG promptly began slope reinforcement repairs of the perimeter embankments, and those repairs were completed in July 2023. As part of the slope repairs, the excavation was partially dewatered and MERG performed additional excavation in the areas adjacent to the embankment sloughing to remove any potential CCR contamination that could have come from the embankment material. Through discussion with EGLE, a supplemental reverification was performed of the area adjacent to the Western and Southern Perimeter Embankments as discussed herein. A separate grid node system was developed for this reverification area and approved by EGLE.

The field and microscopic results of the X-series nodes indicate that each node meets the three lines of evidence for CCR removal in accordance with the Closure Work Plan (Ref. [1]).

4 Certification

Based on the review of the B.C. Cobb Generating Facility Bottom Ash Pond and Ponds 0-8 Closure Work Plan developed by Golder Associates, Inc. dated May 30, 2018, the modifications of the Closure Work Plan approved by the Michigan Department of Environment, Great Lakes, and Energy, and the attached documentation of this report, I certify to the best of my knowledge, information, and belief that this CCR Removal Report - Supplement No. 3 is accurate and that MERG has met the intent of the Closure Work Plan in regards to the X-series nodes detailed herein.

Bryce Burkett, P.E.
Senior Geotechnical Project Manager

07 Dec 2023

5 References

Ref. [1] Golder Associates, Inc. B.C. Cobb Generating Facility, Bottom Ash Pond and Ponds 0-8 Closure Work Plan, May 30, 2018.

Ref. [2] HDR Michigan, Inc., CCR Removal Report, Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8, September 19, 2022.

Ref. [3] HDR Michigan, Inc., CCR Removal Report – Supplement No. 1, Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8, December 7, 2022.

Ref. [4] HDR Michigan, Inc., CCR Removal Report – Supplement No. 2, Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8, June 8, 2023.

TABLE 2
SAMPLE NODE SUMMARY

Table 2: Sample Node Summary

Node ID	Date Sampled	Northing (feet)	Easting (feet)	Final Field Elevation (feet)	Design Elevation (feet)	Final Elevation Difference Relative to Closure Work Plan (-/+ feet)	HDR Microscopic Estimation of CCR (%)	CTL Microscopic Estimation QC (%)	HDR Microscopy Pass/Fail (< 5%)	Potholing Pass/Fail	CCR Present at Surface
X1	11/2/2023	647398.1	12622630.6	--	--	--	NS	NS	NS	N/A	No
X2	11/2/2023	647368.1	12622600.6	--	--	--	NS	NS	NS	N/A	No
X3	11/2/2023	647338.1	12622570.6	--	--	--	NS	NS	NS	N/A	No
X4	11/2/2023	647308.1	12622540.6	--	--	--	NS	NS	NS	N/A	No
X5	11/2/2023	647218.1	12622480.6	--	--	--	NS	NS	NS	N/A	No
X6	11/2/2023	647188.1	12622450.6	--	--	--	<1%	NS	Pass	N/A	No
X7	11/2/2023	647098.1	12622390.6	--	--	--	NS	NS	NS	N/A	No
X8	11/2/2023	647068.1	12622360.6	--	--	--	NS	NS	NS	N/A	No
X9	11/2/2023	647038.1	12622330.6	--	--	--	NS	NS	NS	N/A	No
X10	11/2/2023	647008.1	12622300.6	--	--	--	NS	NS	NS	N/A	No
X11	11/2/2023	646948.1	12622270.6	--	--	--	NS	NS	NS	N/A	No
X12	11/2/2023	646888.1	12622240.6	--	--	--	<1%	NS	Pass	N/A	No
X13	11/2/2023	646828.1	12622210.6	--	--	--	1-2%	NS	Pass	N/A	No
X14	11/2/2023	646798.1	12622210.6	--	--	--	NS	NS	NS	N/A	No
X15	11/2/2023	646738.1	12622180.6	--	--	--	NS	NS	NS	N/A	No
X16	11/2/2023	646708.1	12622180.6	--	--	--	NS	NS	NS	N/A	No
X17	11/2/2023	646588.1	12622150.6	--	--	--	NS	NS	NS	N/A	No
X18	11/2/2023	646498.1	12622120.6	--	--	--	1-2%	NS	Pass	N/A	No
X19	11/2/2023	646468.1	12622120.6	--	--	--	<1%	NS	Pass	N/A	No
X20	11/2/2023	646318.1	12622180.6	--	--	--	NS	NS	NS	N/A	No
X21	11/2/2023	646318.1	12622210.6	--	--	--	1-2%	NS	Pass	N/A	No
X22	11/2/2023	646288.1	12622330.6	--	--	--	NS	NS	NS	N/A	No
X23	11/2/2023	646288.1	12622360.6	--	--	--	2-3%	NS	Pass	N/A	No
X24	11/2/2023	646288.1	12622390.6	--	--	--	NS	NS	NS	N/A	No
X25	11/2/2023	646288.1	12622420.6	--	--	--	<1%	NS	Pass	N/A	No
X26	11/2/2023	646288.1	12622450.6	--	--	--	NS	NS	NS	N/A	No
X27	11/2/2023	646258.1	12622660.6	--	--	--	NS	NS	NS	N/A	No
X28	11/2/2023	646258.1	12622690.6	--	--	--	NS	NS	NS	N/A	No
X29	11/2/2023	646258.1	12622720.6	--	--	--	1%	NS	Pass	N/A	No
X30	11/2/2023	646228.1	12622840.6	--	--	--	NS	NS	NS	N/A	No
X31	11/2/2023	646228.1	12622870.6	--	--	--	NS	NS	NS	N/A	No
X32	11/2/2023	646198.1	12622930.6	--	--	--	1-2%	NS	Pass	N/A	No
X33	11/2/2023	646198.1	12622960.6	--	--	--	NS	NS	NS	N/A	No
X34	11/2/2023	646168.1	12623020.6	--	--	--	NS	NS	NS	N/A	No
X35	11/2/2023	646138.1	12623080.6	--	--	--	NS	NS	NS	N/A	No
X36	11/2/2023	646108.1	12623110.6	--	--	--	NS	NS	NS	N/A	No
X37	11/2/2023	646078.1	12623170.6	--	--	--	<1%	NS	Pass	N/A	No
X38	11/2/2023	646018.1	12623230.6	--	--	--	NS	NS	NS	N/A	No
X39	11/2/2023	645988.1	12623260.6	--	--	--	NS	NS	NS	N/A	No
X40	11/2/2023	645928.1	12623290.6	--	--	--	NS	NS	NS	N/A	No
X41	11/2/2023	645838.1	12623350.6	--	--	--	NS	NS	NS	N/A	No
X42	11/2/2023	645808.1	12623350.6	--	--	--	NS	NS	NS	N/A	No
X43	11/2/2023	645748.1	12623380.6	--	--	--	NS	NS	NS	N/A	No
X44	11/2/2023	645718.1	12623410.6	--	--	--	NS	NS	NS	N/A	No
X45	11/2/2023	645688.1	12623410.6	--	--	--	NS	NS	NS	N/A	No
X46	11/2/2023	645628.1	12623440.6	--	--	--	NS	NS	NS	N/A	No
X47	11/2/2023	645568.1	12623470.6	--	--	--	<1%	NS	Pass	N/A	No

N/A - Potholing not performed.
NS - Sample not randomly taken for microscopy

FIGURE

N

150 0 150 300

SCALE IN FEET

X1 X2 X3 X4 X5 X6 X7 X8 X9 X10 X11 X12 X13 X14 X15 X16 X17 X18 X19 X20 X21 X22 X23 X24 X25 X26 X27 X28 X29 X30 X31 X32 X33 X34 X35 X36 X37 X38 X39 X40 X41 X42 X43 X44 X45 X46 X47

578 574 570 572 576 566 580 568

15' OFFSET

15' OFFSET

15' OFFSET

30 0 30 60

SCALE IN FEET

LEGEND

- CCR REMOVAL GRID NODE
- PHOTOGRAPHIC DOCUMENTATION NODE
- PHOTOGRAPHIC & MICROSCOPY DOCUMENTATION NODE
- SUPPLEMENTAL CCR REMOVAL GRID NODE
- SUPPLEMENTAL PHOTOGRAPHIC DOCUMENTATION NODE
- SUPPLEMENTAL PHOTOGRAPHIC & MICROSCOPY DOCUMENTATION NODE
- VERIFICATION AREA

NOTES

1. TOPO SHOWN REPRESENTS EXCAVATION PLAN APPROVED BY THE STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY (EGLE) ON OCTOBER 16, 2018.

HDR

MUSKEGON ENVIRONMENTAL REDEVELOPMENT GROUP, LLC (MERG)
BC COBB ASH POND CLOSURE

SAMPLE NODE LAYOUT

DATE
DECEMBER 2023

FIGURE
1

ATTACHMENT A
HDR OBSERVATION REPORT

OBSERVATION REPORT – Follow-up Sampling Area

HDR Project No.	10220433	**Project Name:**	B.C. Cobb Ash Pond Closure
Client:	MERG	**Site Location:**	Muskegon, Michigan

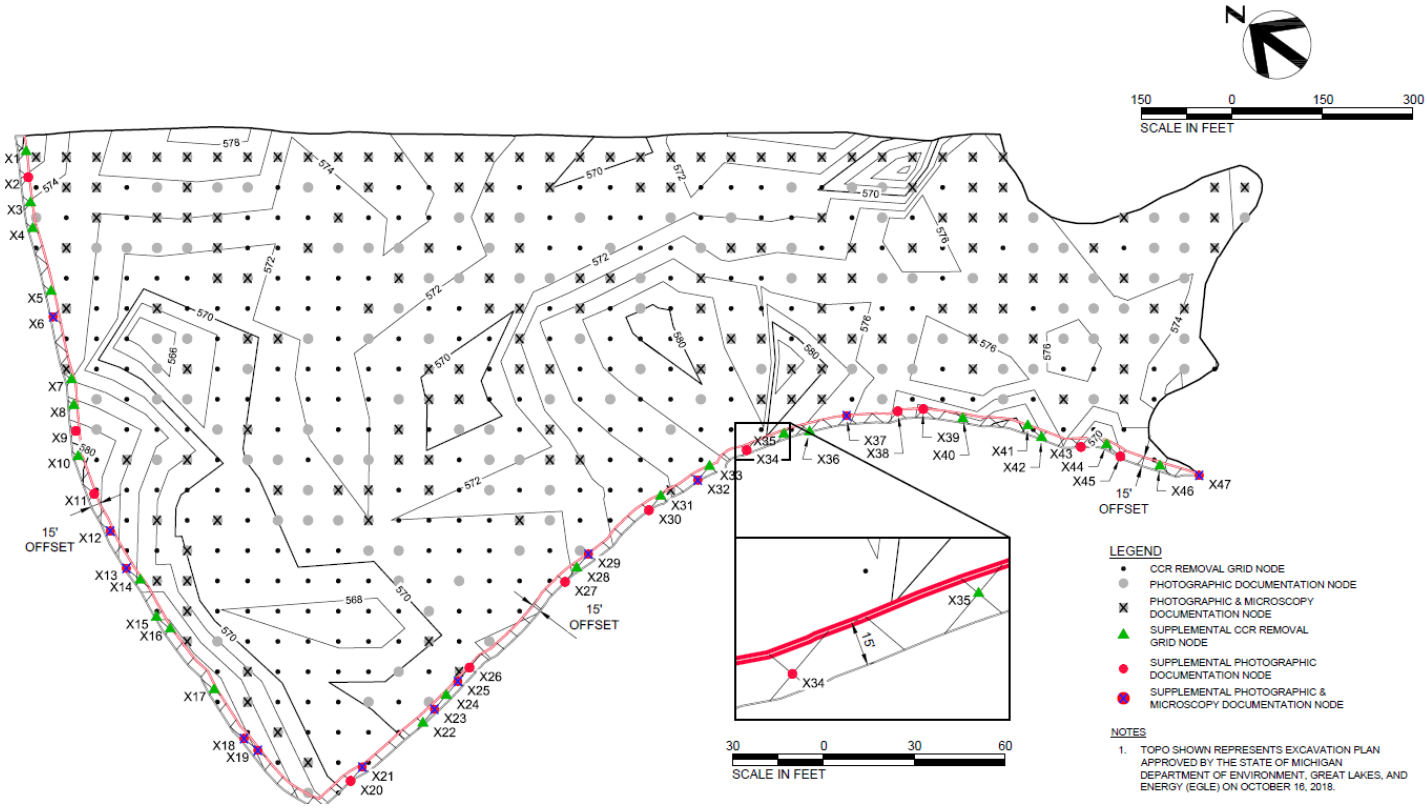
DAILY REPORT DATA

Inspection Date:	November 2, 2023	**Report No.:**	007
Inspected By:	Bryce Burkett		

WEATHER CONDITIONS

Conditions:	Sunny	**Temperature:**	30-40 °F
Wind:	10-15 mph	**Precipitation:**	None

AREA INSPECTED



Total Nodes Sampled: 24
No. of Nodes - Photography: 24
No. of Nodes - Microscopy: 12

DOCUMENTATION OF EXCAVATION GRADES

Data Survey Received from Charah:	N/A
No. of Nodes Above Design Grade:	N/A
No. of Nodes Hand-Augered (Potholed):	N/A

VISUAL INSPECTION OF AREA – Follow-up Sampling Area

Photographs Taken of Area: No, excavation was inundated with water.

Closure Area #7 Notes:

General Site Conditions:

- The excavation has been inundated with water after the completion of slope repairs.
- The node areas that were visible in shallow water depths consisted of natural sands.
- Depths of water at the node locations ranged from approximately 2-4 feet.

Photographs:

- Due to standing water, representative samples were taken at all photographic node location and brought to shore and photographs of the twenty-four (24) samples were taken.

HDR Microscopy Results:

- Twelve (12) X-series sample locations were analyzed for microscopic quantification.
- Twelve (12) nodes pass, 0 nodes fail within the X-series sample nodes.

Node ID	HDR Microscopic Estimation of CCR (%)	HDR Microscopy Pass/Fail (< 5%)
X6	<1%	Pass
X12	<1%	Pass
X13	1-2%	Pass
X18	1-2%	Pass
X19	<1%	Pass
X21	1-2%	Pass
X23	2-3%	Pass
X25	<1%	Pass
X29	1%	Pass
X32	1-2%	Pass
X37	<1%	Pass
X47	<1%	Pass

ATTACHMENT B
PHOTOGRAPHIC DOCUMENTATION –
PHOTOGRAPHIC NODES

Client Name:	Site Location:	Node Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 1	
Node: X2	

Photograph No. 2	
Node: X6 HDR Microscopic Quantification Result: <1%	

Client Name:	Site Location:	Node Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 3	
Node: X9	

Photograph No. 4	
Node: X11	

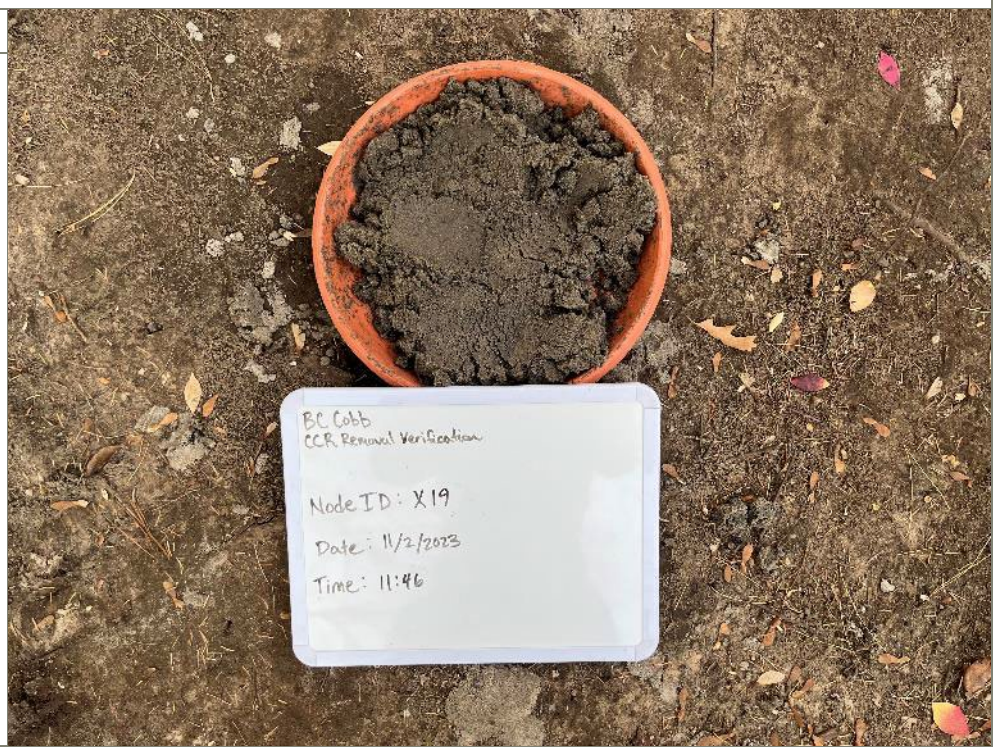
Client Name:	Site Location:	Node Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 5	
Node: X12 HDR Microscopic Quantification Result: <1%	

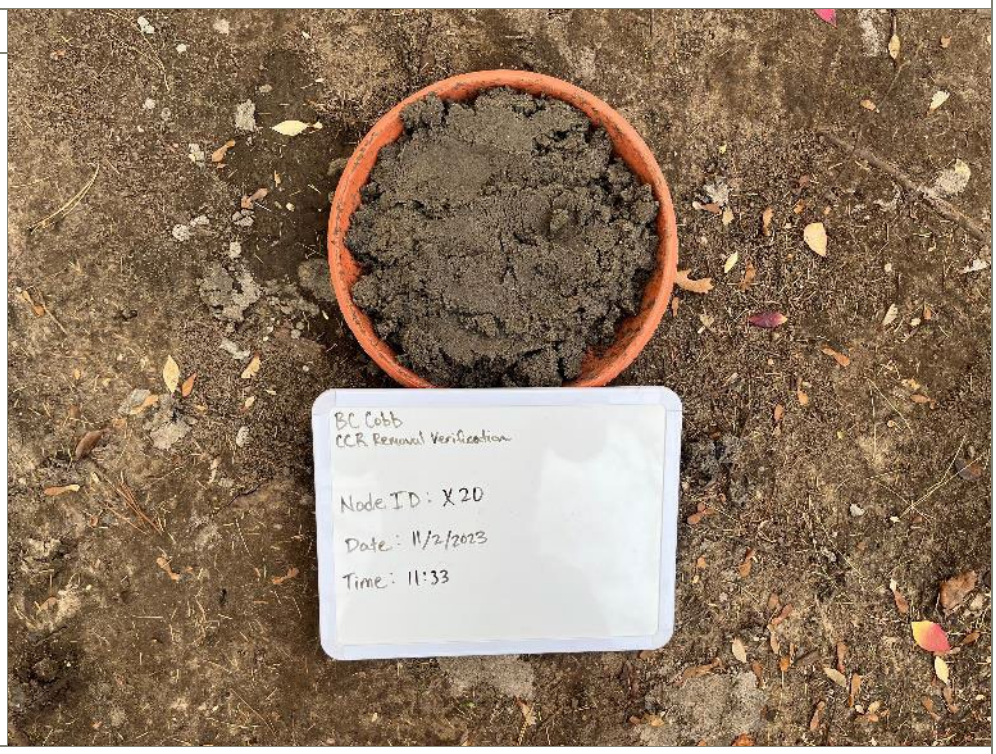
Photograph No. 6	
Node: X13 HDR Microscopic Quantification Result: 1-2%	

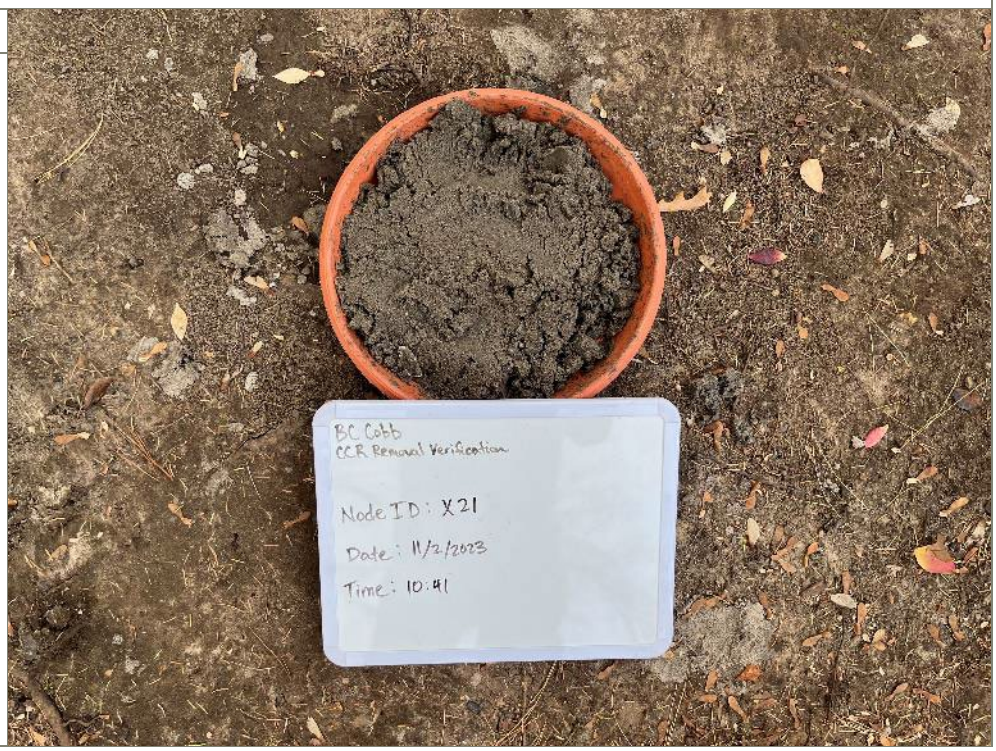
Client Name:	Site Location:	Node Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 7	
Node: X18 HDR Microscopic Quantification Result: 1-2%	

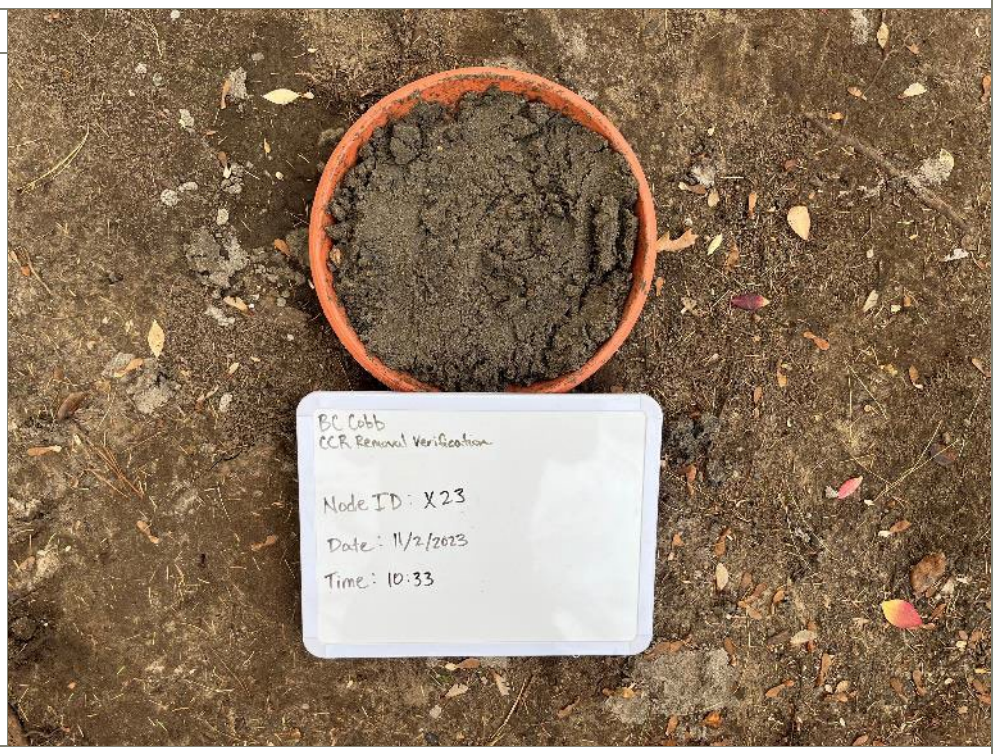
Photograph No. 8	
Node: X19 HDR Microscopic Quantification Result: <1%	

Client Name:	Site Location:	Node Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 9	
Node: X20	

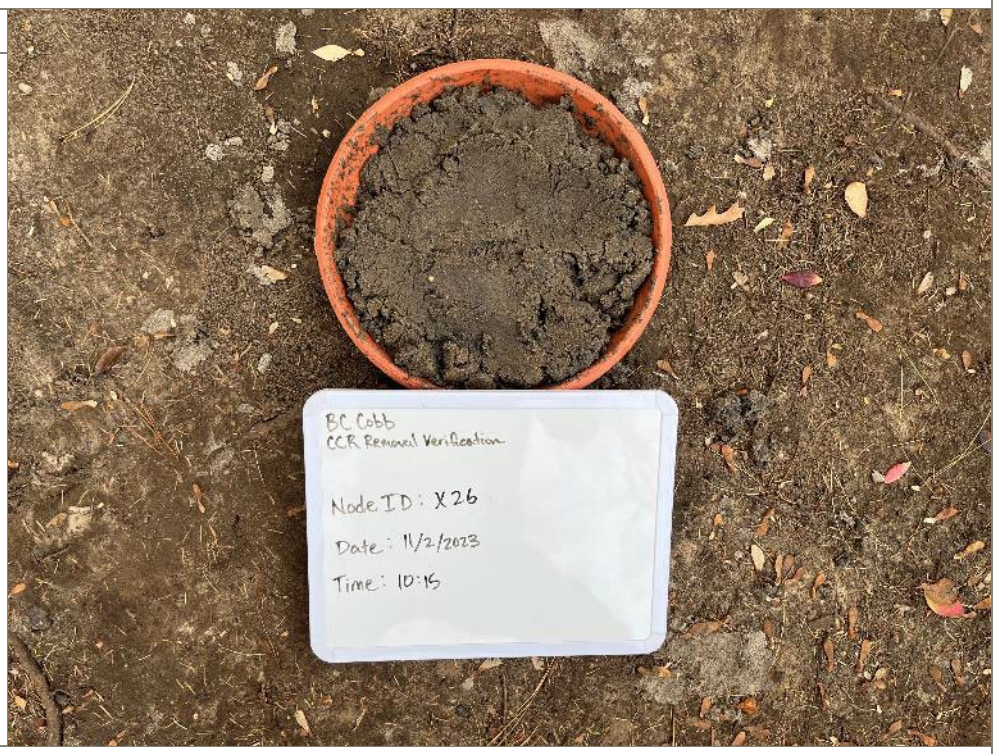
Photograph No. 10	
Node: X21 HDR Microscopic Quantification Result: 1-2%	

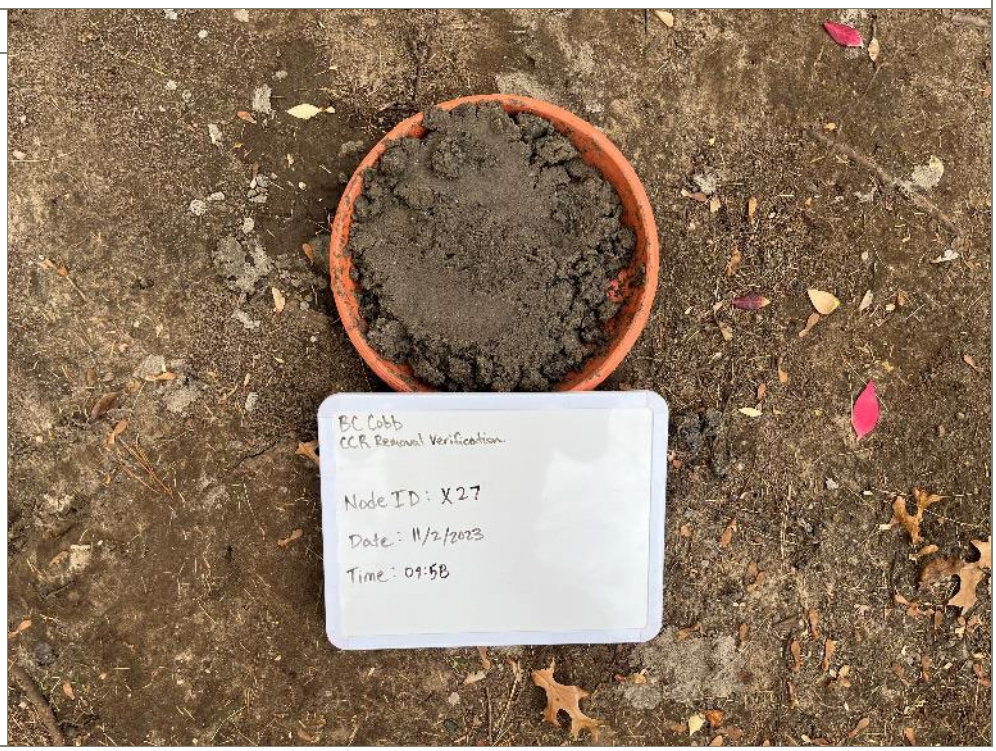
Client Name:	Site Location:	Node Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 11	
Node: X23 HDR Microscopic Quantification Result: 2-3%	

Photograph No. 12	
Node: X25 HDR Microscopic Quantification Result: <1%	

Client Name:	Site Location:	Node Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 13	
Node: X26	

Photograph No. 14	
Node: X27	

Client Name:	Site Location:	Node Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 15	
Node: X29 HDR Microscopic Quantification Result: 1%	

Photograph No. 16	
Node: X30	

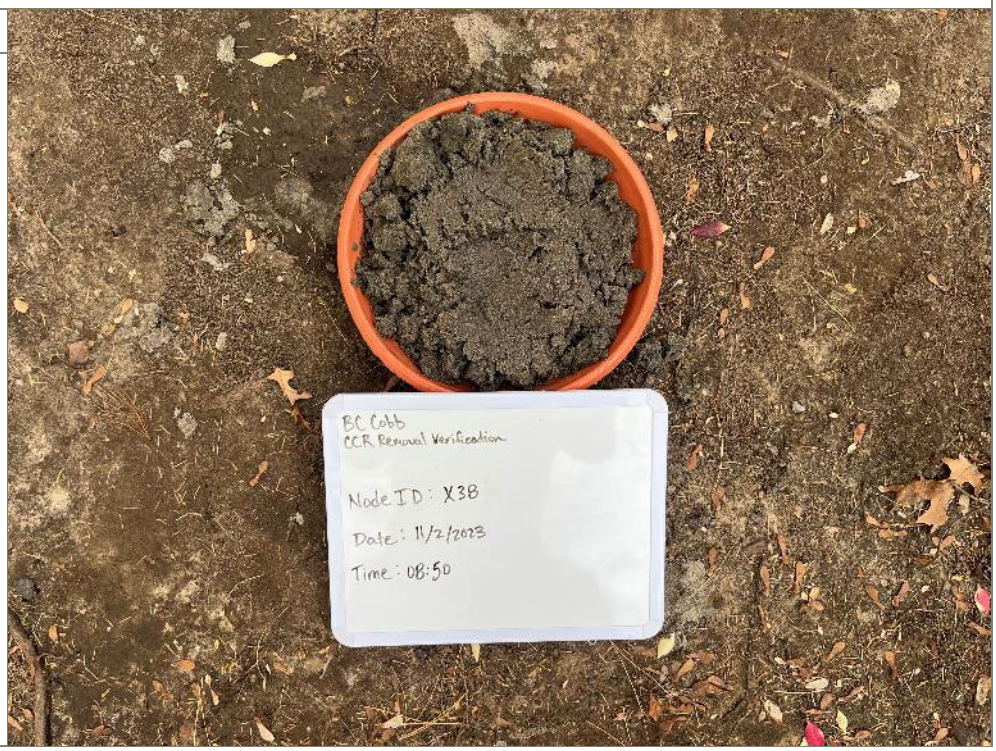
Client Name:	Site Location:	Node Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 17	
Node: X32 HDR Microscopic Quantification Result: 1-2%	

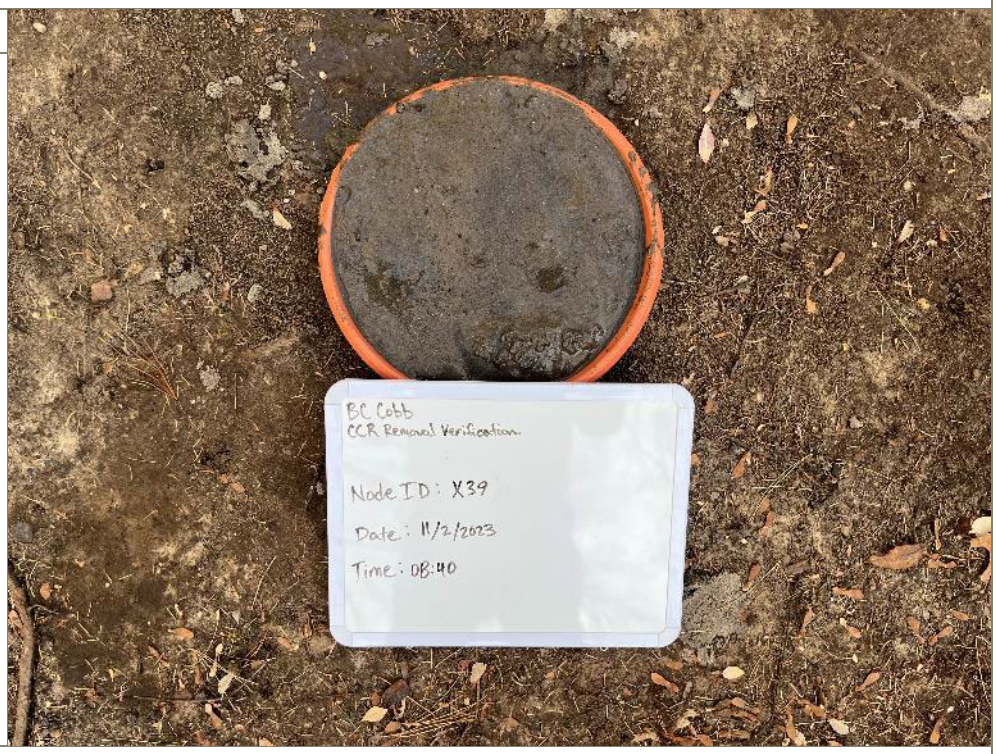
Photograph No. 18	
Node: X34	

Client Name:	Site Location:	Node Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 19	
Node: X37 HDR Microscopic Quantification Result: <1%	

Photograph No. 20	
Node: X38	

Client Name:	Site Location:	Node Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 21	
Node: X39	

Photograph No. 22	
Node: X43	

Client Name:	Site Location:	Node Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 23	
Node: X45	

Photograph No. 24	
Node: X47 HDR Microscopic Quantification Result: <1%	

ATTACHMENT C

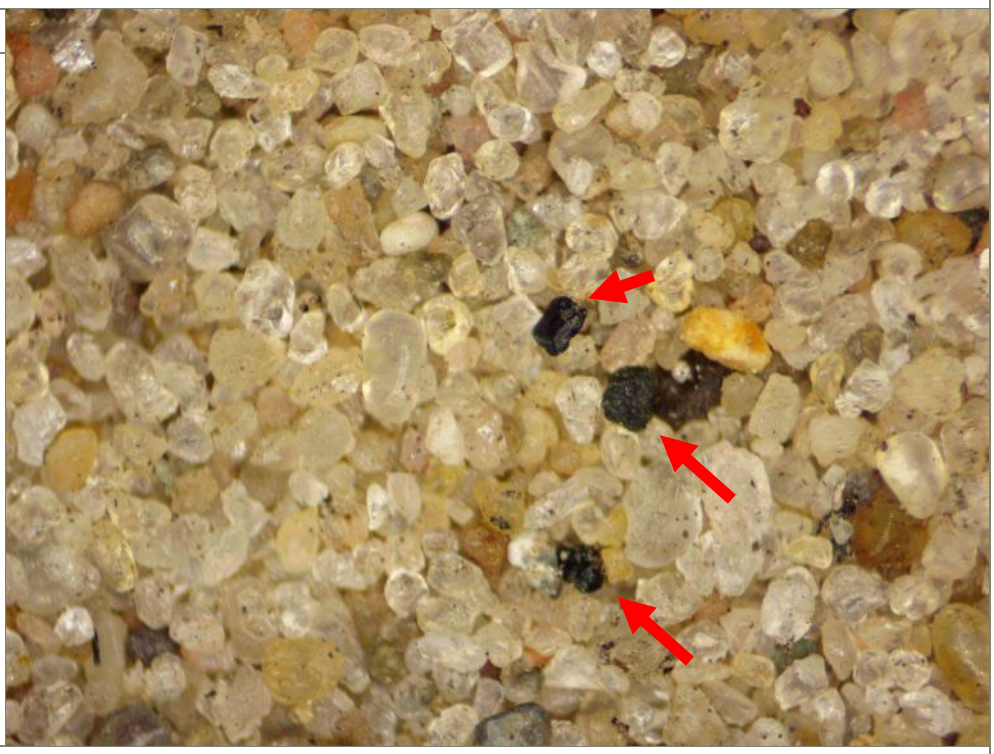
PHOTOGRAPHIC DOCUMENTATION –
MICROSCOPIC QUANTIFICATION

Client Name:	Site Location:	Microscopic Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 1	
Node: X6 HDR Microscopic Quantification Result: <1% Note: Light colored and transparent quartz. Scarce CCR present.	

Photograph No. 2	
Node: X18 HDR Microscopic Quantification Result: 1-2% Note: Sporadic small CCR particles (red arrows) mixed with clean sand. Some dark particles appear to be natural sands.	

Client Name:	Site Location:	Microscopic Photographic Log
Muskegon Environmental Redevelopment Group, LLC (MERG)	Former B.C. Cobb Power Plant Bottom Ash Pond and Ponds 0-8 Muskegon, Michigan	HDR Project No. 10220433

Photograph No. 3	
Node: X29 HDR Microscopic Quantification Result: 1% Note: Clean natural sands with sporadic CCR particles (red arrows).	

Photograph No. 4	
Node: X37 HDR Microscopic Quantification Result: <1% Note: Clean natural sands.