

**GROUNDWATER SAMPLING AND ANALYSIS PROGRAM
SELECTION OF STATISTICAL METHOD CERTIFICATION
TEXAS MUNICIPAL POWER AGENCY
GIBBONS CREEK STEAM ELECTRIC GENERATING STATION
ANDERSON, TEXAS**

**COAL COMBUSTION RESIDUALS UNITS:
SITE F LANDFILL, SCRUBBER SLUDGE POND, ASH PONDS**

Amec Foster Wheeler Environment and Infrastructure, Inc. (Consultant) has been retained by the Texas Municipal Power Agency to install a groundwater monitoring network, develop a Sampling and Analysis Plan, collect baseline groundwater quality samples, perform data evaluation, and select the appropriate statistical method for evaluating groundwater monitoring data as required by 40 C.F.R. § 257.93. Presented below are the project background, assessment, limitations, and the Engineer's Certification.

1.0 BACKGROUND

Pursuant to 40 C.F.R. § 257.90(b)(2), owners and operators of new CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of a CCR unit, must develop a groundwater sampling and analysis program that includes selection of the statistical procedures to be used for evaluating groundwater monitoring data as required by 40 C.F.R. § 257.93. 40 C.F.R. § 257.93(f) requires the owner or operator of the CCR unit to select one of the specified methods to be used in evaluating groundwater monitoring data for each specified chemical constituent. The statistical method selected must be conducted for each constituent in each groundwater monitoring well, in the CCR Unit's Groundwater Monitoring System.

Pursuant to 40 C.F.R. § 257.93(f)(6), the owner or operator of the CCR unit must obtain a certification from a qualified Professional Engineer stating that the selected statistical method is appropriate for evaluating the groundwater monitoring data for the CCR Unit. The certification must include a narrative description of the selected statistical method.

In support of the Consultant's method selection, the Consultant evaluated existing groundwater quality data from prior groundwater monitoring events, and determined that sufficient information is available to make the requisite certification.

2.0 NARRATIVE DESCRIPTION OF CHOSEN STATISTICAL METHOD

Based upon a review of existing groundwater monitoring data for the Groundwater Monitoring Systems at the Site F Landfill and Scrubber Sludge Pond/Ash Ponds, the Consultant concludes the following:

The **Prediction Interval Procedure** statistical method, outlined in 40 C.F.R. § 257.93(f)(3), is the preliminarily selected method for evaluating the groundwater monitoring data. If, at a future date, a different statistical method is more appropriate for the data set, an alternative appropriate method from the remaining methods listed in 257.93(f) will be selected, and this Certification Statement will be revised and updated.

3.0 LIMITATIONS

The Consultant's signature on this document represents that to the best of the Consultant's knowledge, information, and professional judgment, the aforementioned information is accurate as of the signature date. The Consultant's opinions and decisions are made on the basis of the Consultant's experience, qualifications, and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions (or other estimates) are based on available data, and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

4.0 CERTIFICATION

I, **Seth Green**, being a Registered Professional Engineer with the State of Texas, do hereby certify to the best of my knowledge, information, and belief, that, pursuant to 40 C.F.R. § 257.93, and as of January 12, 2018, the selected statistical method is appropriate for evaluating the groundwater monitoring data for the Site F Landfill and Scrubber Sludge Pond/Ash Ponds. The statistical method selection process has been conducted in accordance with recognized and generally accepted good engineering and scientific practices.

SIGNATURE



DATE

1/12/18

