GROUNDWATER MONITORING SYSTEM CERTIFICATION TEXAS MUNICIPAL POWER AGENCY

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

GIBBONS CREEK STEAM ELECTRIC STATION 12824 FM 244 Road, Anderson, Texas

Amec Foster Wheeler Environment and Infrastructure, Inc. (Consultant) has been retained by the Texas Municipal Power Agency to develop Groundwater Monitoring Systems for the following Coal Combustion Residuals (CCR) Units: Site F Landfill, Ash Ponds, and Scrubber Sludge Pond. An evaluation of the Groundwater Monitoring Systems was conducted in support of verification that the System meets the design and construction requirements specified in 40 C.F.R. § 257.91. Presented below are the project background, limitations, and the Engineer's Certification.

1.0 BACKGROUND

Pursuant to 40 C.F.R. § 257.90(b)(1), owners and operators of existing CCR landfills and surface impoundments must develop a Groundwater Monitoring System, as required by 40 C.F.R. § 257.91. 40 C.F.R. § 257.91 requires owners and operators of a CCR unit to construct 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 accurately represent the quality of background groundwater that has not been affected by leakage from the CCR unit and accurately represent the quality of groundwater passing the waste boundary of the CCR unit. Pursuant to 40 C.F.R. § 257.91(f), the owner or operator must obtain certification from a qualified Professional Engineer stating that the System has been designed and constructed to meet the requirements of section 40 C.F.R. § 257.91.

In support of the Consultant's assessment, the Consultant evaluated the System for the above-referenced CCR unit, and prepared the document titled *Groundwater Monitoring Well Plan, Gibbons Creek Steam Electric Station Grimes County, Texas*, dated October 13, 2017. Based on past hydrogeologic assessment, and CCR unit design, the Consultant has determined that sufficient information is available to make the requisite certification.

2.0 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.

3.0 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 the Groundwater Monitoring Systems for the Site F Landfill, Ash Ponds, and Scrubber Sludge Pond has been designed and constructed to meet the requirements of 40 C.F.R. § 257.91 and in accordance with recognized and generally accepted good engineering and scientific practices.

SETH EDWARD GREE

SIGNATURE

DATE

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