GROUNDWATER MONITORING SYSTEM CERTIFICATION 40 CFR 257.91(f) PLANT BOWEN LANDFILL CELLS 3 & 4 GEORGIA POWER COMPANY

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 CFR Part 257 and Part 261), §257.91, requires the owner or operator of an existing CCR unit to install a groundwater monitoring system. The owner or operator must obtain a certification from a qualified professional engineer stating that the groundwater monitoring system has been designed and constructed to meet the requirements of 40 CFR Part 257.91.

According to 40 CFR §257.91(a), the groundwater monitoring system must consist 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; and
- 2. Accurately represent the quality of groundwater passing the waste boundary of the CCR unit.

40 CFR §257.91(b) states that the number, spacing, and depths of groundwater monitoring system must be determined based upon site-specific technical information that must include a 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.

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CERTIFICATION

I hereby certify that the groundwater monitoring system for Landfill Cells 3 & 4 has been designed and constructed to meet the requirements of 40 CFR. Part 257.91.

Gregory J. Wrenn, P.E.

Georgia Registered Professional Engineer No. 025565

10/17/2017