Geosyntec consultants

1255 Roberts Boulevard, Suite 200
Kennesaw, Georgia 30144
PH 678.202.9500
FAX 678.202.9501
www.geosyntec.com

STATISTICAL ANALYSIS METHOD CERTIFICATION
40 CFR §257.93(f)
PLANT HAMMOND ASH POND 3 (AP-3)
GEORGIA POWER COMPANY

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 CFR Part 257 and Part 261), §257.93(f), requires the owner or operator of an existing CCR Unit to identify a statistical method to be used in evaluating groundwater monitoring data for each specified constituent. The owner or operator must obtain a certification from a qualified professional engineer (PE) stating that the selected statistical method is appropriate for evaluating the groundwater monitoring data for the CCR management area meeting the requirements of 40 CFR §257.93.

Statistical Methodology

The selected statistical methods for Georgia Power Plant Hammond AP-3 were developed in accordance with 40 CFR §257.93(f) using methodologies presented in *Statistical Analysis of Groundwater Data at RCRA Facilities, Unified Guidance*, March 2009, EPA 530/R-09-007 (Unified Guidance).

For the detection monitoring program, the statistical test used to evaluate the groundwater monitoring data will be both interwell and intrawell prediction limits (PL) methods combined with a resample plan. The interwell PLs pool background data from the network of upgradient wells to calculate a PL, while the intrawell PLs utilize historical data from within a given well to establish a statistical limit for comparison of compliance data at the same well. An "initial exceedance" occurs when any downgradient well data exceed the PL.

If data from a sampling event initially exceed the PL, the resampling strategy will be used to verify the result. In resampling, independent resample(s) will be collected and evaluated within 90 days to determine whether the initial exceedance is verified. If all resamples exceed the PL, the initial exceedance is verified. When the resample result(s) does not verify the initial result, the initial exceedance is considered an erroneous result and the resample value will replace the initial result. When the resample(s) confirm the initial finding, a statistically

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significant increase (SSI) is determined. An SSI is determined only if the resample(s) verify the initial exceedance (i.e. the resample(s) also exceeds the PL).

In the event a confirmed SSI over background is identified, assessment monitoring will be initiated within 90 days unless a demonstration is made within that same timeframe that the SSI resulted from a source other than the CCR Unit.

CERTIFICATION

I hereby certify that the groundwater statistical method for the CCR Unit located at Georgia Power's Plant Hammond located at 5963 Alabama (Georgia 20) Hwy,. Rome, Georgia 30165, and designated as Ash Pond 3 (AP-3) has been designed and constructed to meet the requirements of 40 CFR §257.93(f).

Whitney B. Law, PE
Licensed State of GA PE No. PE036641

April 17, 2019
Date