

**GROUNDWATER SAMPLING AND ANALYSIS PROGRAM
SELECTION OF STATISTICAL METHOD CERTIFICATION
LOWER COLORADO RIVER AUTHORITY
COAL COMBUSTION RESIDUALS UNIT: COMBUSTION BYPRODUCTS LANDFILL
FAYETTE POWER PROJECT
LA GRANGE, TEXAS**

AMEC FOSTER WHEELER (Consultant) has been retained by the Lower Colorado River Authority (LCRA) to evaluate the above-referenced coal combustion residuals (CCR) landfill Groundwater Monitoring System, the associated Sampling and Analysis Plan, and existing geochemical data to determine the appropriate statistical method for evaluating groundwater monitoring data as required by 40 C.F.R. § 257.93. Presented below are the project background, narrative description, 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 management area. The certification must include a narrative description of the selected statistical method.

In support of the Consultant's method selection, the Consultant evaluated existing geochemical 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 provided by LCRA for the CCR Unit's Groundwater Monitoring System, the Consultant concludes the following:

The **Tolerance or 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

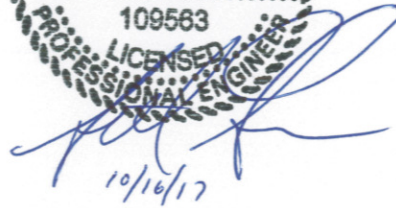
I, **Seth Green**, being a Registered Professional Engineer with the State of Texas, do hereby certify to the best of my knowledge, information, and belief, that, pursuant to 40 C.F.R. § 257.93, and as of October 16, 2017, the selected statistical method is appropriate for evaluating the groundwater monitoring data for the CCR Unit: Combustion Byproducts Landfill. The statistical method selection process has been conducted in accordance with recognized and generally accepted good engineering and scientific practices.

SIGNATURE



DATE

10/16/17



10/16/17