

STATISTICAL ANALYSIS METHOD CERTIFICATION
40 CFR §257.93(f)
PLANT HAMMOND – HUFFAKER ROAD LANDFILL
GEORGIA POWER COMPANY

EPA's "Disposal of Coal Combustion Residuals from Electric Utilities" Final Rule (40 CFR Part 257 and Part 261), §257.93, 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 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 method for Plant Hammond Huffaker Road Landfill was developed in accordance with 40 CFR §257.93(f) using methodology 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 the intrawell prediction limit (PL) method combined with a 1-of-3 resample plan. 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 the 1-of-3 resampling, up to two independent resamples will be collected. If both resamples exceed the PL, the initial exceedance is verified. When the resample result does not verify the initial result, the initial exceedance is considered an erroneous result and the resample values will replace the initial result. When the resample confirms the initial finding, a statistically significant increase (SSI) is determined. An SSI is determined only if both resample results verify the initial exceedance (i.e. the resample 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.

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CERTIFICATION

I hereby certify that the groundwater statistical method for the CCR Unit located at Georgia Power's Plant Hammond located at 2181 Huffaker Road, Rome Georgia 30165, and designated as Huffaker Road Landfill has been designed and constructed to meet the requirements of 40 CFR §257.93.


Hunter S. Sartain
Licensed State of GA PE No. 032318
10/17/2017

