

GROUNDWATER MONITORING SYSTEM AND

STATISTICAL METHOD CERTIFICATION

The groundwater monitoring system for the CCR Inactive Impoundment at Muskogee consists of one (1) upgradient and four (4) downgradient shallow permanent groundwater monitoring wells. The location and depths of the installed groundwater monitoring wells were selected to yield groundwater samples from the uppermost aquifer and, to represent background groundwater and, the groundwater passing the waste boundary of the Coal Combustion Residual (CCR) unit.

Sanitas Statistical Analysis Method for Groundwater will be the statistical method used to determine the significant levels and comparison of constituents in the groundwater at the Muskogee Generating Facility. The Sanitas Statistical Analysis Method for Groundwater Analysis will be in compliance with 40 CFR 257.93 and the Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance (EPA, March 2009) and & OAC 252:517-9-4(h) Statistical method performance standard. The statistical evaluation will be to verify whether a statistically significant increase (SSI) of contaminant concentrations has occurred in groundwater samples when comparing a compliance monitoring sample analytical result with background (baseline) groundwater analytical results.

I hereby certify, as a Professional Engineer in the State of Oklahoma, that to the best of my knowledge and belief, the information presented in this document are correct. The groundwater monitoring system for the CCR Inactive Impoundment at Muskogee is designed and constructed to meet the requirements of Oklahoma Administrative Code (OAC) 252:517-9-2, Groundwater monitoring systems.

Suraj A. Balan, P.E.

Oklahoma Certificate of Authorization Number: 159

Date

15/2018