Updated Statistical Method Certification
40 CFR §257.93(f)(6)
Williams Station Highway 52 Class 3 Landfill
Moncks Corner, South Carolina

1.0 Regulatory Requirement

The Environmental Protection Agency's (EPA) "*Disposal of Coal Combustion Residuals from Electric Utilities"* Final Rule (40 CFR Part 257 and Part 261) requires pursuant to §257.93(f), the owner or operator of a Coal Combustion Residuals (CCR) unit must select one of the statistical methods specified in §257.93(f)(1) through §257.93(f)(5) to evaluate groundwater monitoring data for each specified constituent. Section 257.93(f)(6) requires the owner or operator to obtain a certification from a qualified professional engineer stating 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 statistical method selected to evaluate the groundwater monitoring data.

The following provides a description of the statistical methods selected to evaluate the groundwater monitoring data at Dominion Energy South Carolina's Williams Station Highway 52 Class 3 Landfill.

2.0 Statistical Method Narrative

Inter-well statistical methods are used to evaluate groundwater monitoring data; meaning data from downgradient wells is compared to upgradient background groundwater quality. The inter-well statistical method is based on prediction limit (PL) methods set to a 95% confidence. The data for all wells is evaluated for detection frequency, potential outliers, and missing data. Extreme values or identified errors are removed from the dataset, if warranted. Background datasets are then tested for normality. The parametric upper PL is used for datasets that exhibit a normal or lognormal distribution and datasets with a non-normal distribution utilize a non-parametric upper PL.

In addition to background comparisons, Groundwater Protection Standards (GWPS) are established for Appendix IV constituents that are detected within the monitoring network. Default GWPS from the CCR Rule will be used unless the calculated background exceeds the default GWPS. Statistical comparisons to the GWPS will be made using a lower confidence limit (LCL).

3.0 Certification

I, the undersigned South Carolina Professional Engineer, hereby certify that I am familiar with the technical requirements of §257.93. I also certify that it is my professional opinion that, to the best of my knowledge, information, and belief, the revised statistical methods described herein are appropriate for evaluating the groundwater monitoring data for the CCR management area and are in accordance with current good and accepted engineering practice(s) and standard(s) appropriate to the nature of the project and the technical requirements of §257.93.

Updated Statistical Method Certification
40 CFR §257.93(f)(6)
Williams Station Highway 52 Class 3 Landfill
Moncks Corner, South Carolina

For the purpose of this document, “certify” and “certification” shall be interpreted and construed to be a “statement of professional opinion”. The certification is understood and intended to be an expression of my professional opinion as a South Carolina Licensed Professional Engineer, based upon knowledge, information, and belief. The statement(s) of professional opinion are not and shall not be interpreted or construed to be a guarantee or a warranty of the monitoring system.

Nakia W. Addison	31497
Printed Name of Professional Engineer	State of South Carolina License Number
	7/31/2025
Signature of Professional Engineer	Date

SOUTH CAROLINA
LICENSED PROFESSIONAL ENGINEER
No. 31497
NAKIA W. ADDISON

SOUTH CAROLINA
TRC
ENVIRONMENTAL
CORPORATION
No. 7119
CERTIFICATE OF AUTHORIZATION