

ENGINEER CERTIFICATION

Statistical Method Certification [40 CFR §257.93(f)(6)] Bremo Power Station – West Pond Bremo Bluff, Virginia

EPA’s “Disposal of Coal Combustion Residuals from Electric Utilities” Final Rule, 40 CFR §257.93(f)(6), requires the owner or operator of a Coal Combustion Residuals (CCR) unit to 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 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 Virginia Electric and Power Company’s Bremo Power Station West Pond.

Statistical Methods

The selected statistical methods for evaluating the groundwater monitoring data for the Bremo Power Station (West Pond) 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). The statistical methods selected for each constituent are presented in the table below.

| Statistical Methods Selected for Bremo Power Station (West Pond) | |
|--|--------------------------------------|
| Parameter/Constituent | Statistical Method |
| Antimony | Non-Parametric Tolerance Limit (DQR) |
| Arsenic | Non-Parametric Tolerance Limit |
| Barium | Parametric Upper Tolerance Limit |
| Beryllium | Non-Parametric Tolerance Limit |
| Boron | Non-Parametric Tolerance Limit (DQR) |
| Cadmium | Non-Parametric Tolerance Limit |
| Calcium | Non-Parametric Tolerance Limit |
| Chloride | Non-Parametric Tolerance Limit |
| Chromium | Non-Parametric Tolerance Limit (DQR) |
| Cobalt | Parametric Upper Tolerance Limit |

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| Statistical Methods Selected for Bremo Power Station (West Pond) | |
|--|--|
| Fluoride | Parametric Upper Tolerance Limit |
| Lead | Non-Parametric Tolerance Limit |
| Lithium | Non-Parametric Tolerance Limit |
| Mercury | Non-Parametric Tolerance Limit (DQR) |
| Molybdenum | Non-Parametric Tolerance Limit (DQR) |
| pH | Parametric Lower/Upper Tolerance Limit |
| Radium 226 and 228 (Combined) | Non-Parametric Tolerance Limit |
| Selenium | Non-Parametric Tolerance Limit (DQR) |
| Sulfate | Non-Parametric Tolerance Limit |
| Thallium | Non-Parametric Tolerance Limit (DQR) |
| Total Dissolved Solids | Non-Parametric Tolerance Limit |

DQR – Double Quantification Rule

As presented, the statistical test methods used for the 2022 biennial evaluation of groundwater monitoring data at the Bremo Power Station (West Pond) are based on tolerance limit (TL) methods. Inter-well statistical methods are proposed – meaning that data from downgradient wells will be compared to upgradient background groundwater quality. Using this approach, background data from the network of upgradient wells is used to calculate an upper TL for each parameter/constituent (as well as a lower TL for pH). The background data set for each constituent/parameter was first tested for the presence of outliers. Extreme values identified during outlier testing were evaluated and removed from the dataset if warranted. The background datasets for each constituent/parameter were then tested for normality. The selected statistical method for each constituent/parameter is based on the results of normality testing. For constituent/parameter datasets that exhibited a normal or log-normal distribution, parametric statistical procedures have been selected. For constituent/parameter datasets that exhibited a non-normal distribution, non-parametric statistical procedures have been selected. Constituent/parameter datasets with 100 percent non-detects will use the Double Quantification Rule in accordance with the Unified Guidance. A confirmed compliance well exceedance is determined if any compliance well with 100 percent non-detect data exhibits quantified measurements (*i.e.*, at or above the reporting limit) in two (2) consecutive sample events.

Further details regarding the statistical methods used to evaluate the groundwater monitoring data are presented in the Unified Guidance and the groundwater monitoring plan prepared for the Unit.

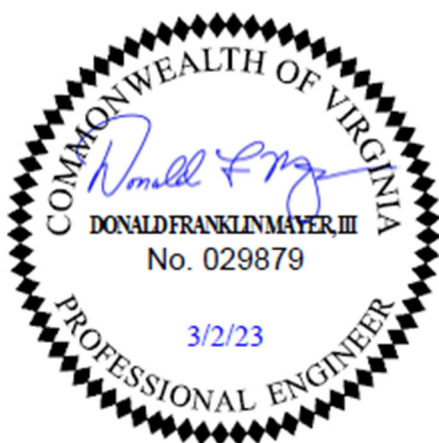
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CERTIFICATION

I hereby certify that the selected statistical methods are appropriate for evaluating the groundwater monitoring data for the CCR management area in accordance with the requirements of 40 CFR §257.93.

As used herein, the word “certify” shall mean an expression of the Engineer’s professional opinion to the best of his or her information, knowledge, and belief, and does not constitute a warranty or guarantee by the Engineer.

WSP USA INC.



Donald Mayer, P.E.

Vice President