STATISTICAL ANALYSIS METHOD CERTIFICATION
40 CFR §257.93(f)
PLANT SCHERER GYPSUM CELL 1 (Cell 1)
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 Scherer Gypsum Cell 1 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 both the interwell and intrawell prediction limit (PL) method combined with a resample plan, respectively. The interwell PLs pool background data from the network of upgradient wells to calculate a PL, while 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 resampling, independent resample(s) will be collected and evaluated within 90 days to determine whether 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 the resample verifies the initial exceedance (i.e. the resample also exceeds the PL).

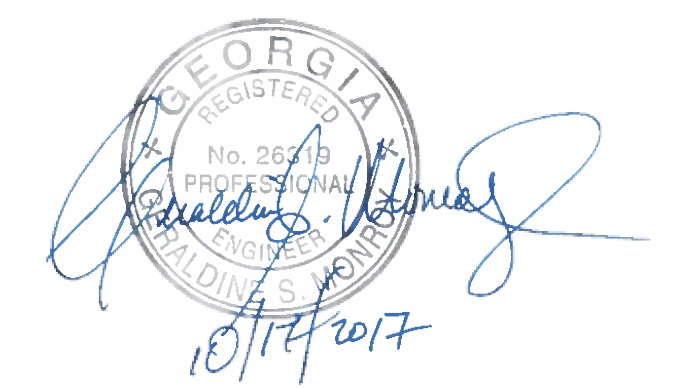
In the event a confirmed SSI over background is identified, assessment monitoring will be initiated within 90 days unless a demonstration is made within that same timeframe that the SSI resulted from a source other than the CCR Unit.

STATISTICAL ANALYSIS METHOD CERTIFICATION
40 CFR §257.93(f)
PLANT SCHERER GYPSUM CELL 1 (Cell 1)
GEORGIA POWER COMPANY

CERTIFICATION

I hereby certify that, in accordance with the requirements of 40 CFR §257.93, the selected statistical method as descripted above is appropriate for evaluating the groundwater monitoring data for the CCR Unit located at Georgia Power's Plant Scherer located at 10986 Georgia 87, Juliette, Georgia 31046, and designated as Gypsm Cell 1 Landfill (Cell 1).

GOLDER ASSOCIATES INC.



Geraldine S. Monroy, P.E.
Licensed State of GA, PE No. 26319
10/17/2017

STATISTICAL ANALYSIS METHOD CERTIFICATION
40 CFR §257.93(f)
PLANT SCHERER PAC ASH LANDFILL (PAC Ash)
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 Scherer PAC Ash Landfill (PAC) 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 both the interwell and intrawell prediction limit (PL) method combined with a resample plan, respectively. The interwell PLs pool background data from the network of upgradient wells to calculate a PL, while 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 resampling, independent resample(s) will be collected and evaluated within 90 days to determine whether 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 the resample verifies 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.

STATISTICAL ANALYSIS METHOD CERTIFICATION
40 CFR §257.93(f)
PLANT SCHERER PAC ASH LANDFILL (PAC Ash)
GEORGIA POWER COMPANY

CERTIFICATION

I hereby certify that, in accordance with the requirements of 40 CFR §257.93, the selected statistical method as described above is appropriate for evaluating the groundwater monitoring data for the CCR Unit located at Georgia Power's Plant Scherer located at 10986 Georgia 87, Juliette, Georgia 31046, and designated as PAC Ash Landfill (PAC).

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