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MEMORANDUM

20 May 2020
File No. 132892

TO: Santee Cooper
Melanie Goings, Geologist

FROM: Haley & Aldrich, Inc.
Jeffrey A. Klaiber, P.E.

SUBJECT: Cross Generating Station Selection of Statistical Procedures Certification for the Closed Gypsum Pond, Santee Cooper

Pursuant to CFR Title 40 Chapter I Subchapter I Part 257 Subpart D §257.93 (f)(6), I certify that the selected statistical method described herein will be appropriate for evaluating the groundwater monitoring data collected for detection and assessment monitoring for the Closed Gypsum Pond. The Closed Gypsum Pond was previously classified as an inactive surface impoundment as defined by 40 CFR §257.53. Santee Cooper filed a Notice of Intent (NOI) to initiate closure of the Gypsum Pond and placed the NOI in the facility's operating record on 10 March 2016. However, on 5 August 2016, the EPA issued a "Direct Final Rule" effective on 4 October 2016, constituting a vacatur of 40 CFR §257.100. The Direct Final Rule applies the requirements of existing surface impoundments that had been previously declared inactive. As a result, owners and operators of inactive CCR surface impoundments must comply with the groundwater monitoring requirements for existing CCR surface impoundments. The Gypsum Pond was certified closed by removal on 11 March 2017. The CCR Rule changes extended the deadlines to comply with the groundwater monitoring requirements.

It is anticipated that a tolerance interval will be used to perform the statistical evaluation for the Closed Gypsum Pond. Any change in the statistical methods will be documented in a subsequent certification once the full data set has been assessed. A tolerance interval is a concentration range, with a specified confidence level, designed to contain a pre-specified proportion (e.g., 95 percent) of the underlying population from which the statistical sample is drawn (background). The upper endpoint of a tolerance interval is called the upper tolerance limit or UTL. Depending on the data distribution, parametric or non-parametric tolerance limits procedures are used to evaluate groundwater monitoring data using this method. Parametric tolerance limits utilize normally distributed data or normalized data via a transformation of the sample background data used to construct the limit. If the data are non-normal and a transformation is not indicated, non-parametric procedures (order statistics or bootstrap methods) are used to calculate the tolerance limit. If all the background data are non-detect, a reporting limit (RL) may serve as an approximate upper tolerance limit.

This certification and the underlying evaluation to select a statistical procedure will be conducted under my direction or supervision according to a system designed to assure that qualified personnel selected

the statistical procedure pursuant to 40 CFR §257.93. The certification submitted is, to the best of my knowledge, accurate and complete.

Sincerely yours,
HALEY & ALDRICH,





Signature

Jeffrey A. Klaiber, P.E
Name

May 20, 2020
Date

22576
Professional Engineer Registration Number