## GROUNDWATER MONITORING SYSTEM CERTIFICATION SITE: SANTEE COOPER CROSS GENERATING STATION CCR UNIT: CLOSED GYPSUM POND

Santee Cooper is the owner of the existing coal combustion residuals (CCR) management unit referred to as the Closed Gypsum Pond at Cross Generating Station (CGS) located in Pineville, South Carolina. This CCR unit is considered subject to the CCR Rule since it was active as of the effective date of the CCR Rule.

Santee Cooper retained Haley & Aldrich, Inc, to design and construct the original groundwater monitoring systems and plans for CGS CCR units, which included system design, a groundwater monitoring plan, a sampling and analysis plan, and a statistical analysis plan to meet requirements of §257.91. The CGS groundwater monitoring system was certified by a Haley & Aldrich Qualified Professional Engineer on October 16, 2017. The CGS Closed Gypsum Pond was closed under a state-approved plan via removal of CCR and an underlying layer of soil pursuant to South Carolina Department of Health and Environmental Control (SCDHEC) regulations. Completed state closure was approved by SCDHEC on March 11, 2017, prior to the CCR Rule's deadline for implementation of a groundwater program and the unit was not initially included in the original CGS CCR groundwater system but added at a later date. Subsequently, the CGS groundwater monitoring system and groundwater monitoring plan has been further enhanced and improved and accordingly recertified.

This document addresses the requirements of §257.91 *Groundwater Monitoring Systems*, specifically section §257.91(f), of the US Environmental Protection Agency's (EPA's) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, 40 CFR Part 257 (CCR Rule) effective October 19, 2015. This document serves as certification that groundwater monitoring system has been designed and constructed to meet the requirements of §257.91. This certification has been prepared based in part upon information made accessible by Santee Cooper pursuant to §257.91(b) and e(1), including a detailed hydrogeologic study conducted by Garrett & Moore in March 2012.

The groundwater monitoring system at the Closed Gypsum Pond exceeds the minimum requirement for one upgradient and three downgradient monitoring wells pursuant to §257.91(c). The actual number of wells used in the Closed Gypsum Pond groundwater monitoring system includes two upgradient and six downgradient wells. This number and the location of the wells are sufficient and appropriate to characterize the quality of groundwater in the uppermost aquifer from background groundwater not affected by leakage from the CCR unit and groundwater passing the waste boundary of the Closed Gypsum Pond based on site-specific conditions. The groundwater monitoring system was designed under my direction and constructed by South Carolina certified well drillers to monitor the uppermost aquifer at the Closed Gypsum Pond.

Amended: December 30, 2022 Original: October 12, 2020

## Certification:

Pursuant to CFR Title 40 Chapter I Subchapter I Part §257 Subpart D §257.91(f), I, Aubree L. Decoteau, being a professional engineer in good standing in the State of South Carolina, do hereby certify to the best of my knowledge, information, and belief that the groundwater monitoring system for the Cross Generating Station Closed Gypsum Pond has been designed to meet the requirements of §257.91(a)(1) and (2) of the Federal Coal Combustion Residuals Rule and to meet requirements of §257.91. The certification submitted is, to the best of my knowledge, accurate and complete.

Signature

Date 12/30/22

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