HALEY & ALDRICH, INC.
400 Augusta Street
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Greenville, SC 29601
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24 January 2020
File No. 132892-014

Subject: Winyah Generating Station Selection of Statistical Procedures Certification for the New Class 3 Landfill Area 1 and Closed Unit 2 Slurry 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 for the CCR management area for the Winyah Class 3 Landfill Area 1 and closed Unit 2 Slurry Pond. The certification for the Class 3 Landfill Area 1 was originally posted to Santee Cooper's publicly available website on October 31, 2018. This document has been amended on January 24, 2020 to include the closed Unit 2 Slurry Pond as it is in the same location as the Class 3 Landfill Area 1. This certification and the underlying evaluation to select a statistical procedure were conducted under my direction or supervision according to a system designed to assure that qualified personnel select the statistical procedure pursuant to 40 CFR §257.93. The certification submitted is, to the best of my knowledge, accurate and complete.

It is anticipated that a tolerance interval will be used to perform the statistical evaluation for the Winyah Class 3 Landfill Area 1 and closed Unit 2 Slurry 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.

Sincerely yours,
HALEY & ALDRICH, INC.

Signature

Jeffrey A. Klaiber, P.E.
Name

01/24/20
Date

22576
Professional Engineer Registration Number

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Originally posted October 31, 2018
Amended on January 24, 2020