EVANS & ASSOCIATES CONSTRUCTION CO., INC.

BIG FORK RANCH FACILITY
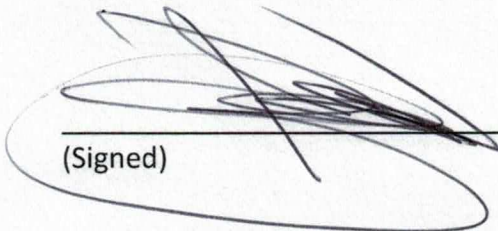
COAL COMBUSTION RESIDUALS FACILITY

GROUNDWATER DATA EVALUATION METHOD CERTIFICATION

This will serve to certify that data collected for the Big Fork Ranch Coal Combustion Residual (CCR) reclamation facility Groundwater Monitoring System is evaluated according DEQ requirements at OAC 252:517-9-4(g)(1-5). A prediction interval procedure, in which an interval for each constituent is established from the distribution of the background data and the level of each constituent in each compliance well is compared to the upper prediction limit (and lower prediction limit in the case of pH), as set forth at 40 CFR § 257.93(f)(3) and OAC 252:517-9-4(g)(3), is the selected statistical method for evaluating data from detection monitoring. A tolerance or prediction interval procedure will be utilized for evaluating data from assessment or corrective action monitoring, if necessary. The statistical methods will be performed in accordance with the CCR rule and USEPA Unified Guidance for Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities (Unified Guidance, March 2009). In general, the procedure for detection monitoring will consist of comparing each constituent in each groundwater monitoring system monitoring well to prediction limits determined based on Inter-Well or Intra-Well Methods, combined with either a one-of-two or one-of-three resampling plan. The selected statistical methods are recommended methods in the Unified Guidance, are capable of maintaining a low site-wide false positive rate while providing high statistical power, and the levels of confidence are such that they are as effective as other approaches as set forth at 40 CFR § 257.93(f) and OAC 252:517-9-4(g) for evaluating groundwater data.

This Certification is in accordance with DEQ rules at OAC 252-517-9-4(g)(6).

M. Saeed Zahrai
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(Sealed)   Oklahoma Professional Engineer #

(seal: REGISTERED PROFESSIONAL ENGINEER — M. SAEED ZAHRAI — 18138 — OKLAHOMA)

(Signed)

Oct, 15, 2018
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(Date)