CHARLES R. LOWMAN POWER PLANT
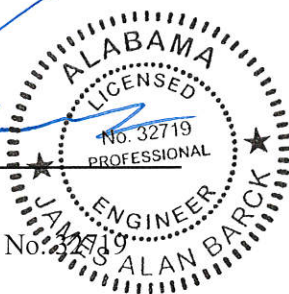## GROUNDWATER DATA STATISTICAL EVALUATION CERTIFICATION STATEMENT

I certify under penalty of law that I am a registered professional engineer experienced in hydrogeologic investigations and environmental remediation. I have reviewed the groundwater sampling and analysis plan prepared for the regulated Coal Combustion Residual management units at the Charles R. Lowman Power Plant facility. I hereby certify, that in my professional opinion, the data evaluation procedures including statistical analysis methods contained therein meet the requirements of 40 CFR 257.93 for groundwater monitoring of the regulated Coal Combustion Residual management units at the Charles R. Lowman Power Plant facility.

As required under 40 CFR 257.93(f) the analytical results of each of the constituents will be compared to the established background concentration for that constituent using one or more of the approved statistical methods detailed in the Unified Guidance for Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities (EPA, 2009). The statistical method(s) used for the evaluation will be appropriate for the distribution of the background data. The appropriate statistical method will be performed on each individual constituent in each monitoring well following each semi-annual sampling event.

In accordance with the certification requirements under 40 CFR 257.93(f)(6) the selected statistical test to be used to evaluate the groundwater monitoring data at the Charles R. Lowman facility will be a prediction interval or tolerance interval method as allowed under 40 CFR 257.93(f)(3), unless this test is determined to be inappropriate for the background data set distribution. If one or more alternative statistical tests are used, an adequate number of independent samples for the statistical method will be collected within the compliance period such that the level of significance for individual well comparison will be no less than 0.01 and no less than 0.05 for multiple comparisons for any statistical test.

The information submitted herein, to the best of my knowledge and belief, is true accurate, and complete. I am aware that there are significant penalties for submitting false information.

James Alan Barck, PE
State of Alabama Registration No. 32719

10-14-17

Date