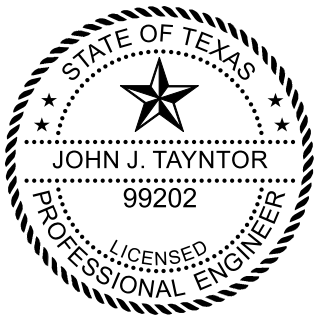
STATISTICAL METHODS CERTIFICATION

COAL COMBUSTION RESIDUALS (CCR) LANDFILL
TWIN OAKS POWER STATION
ROBERTSON COUNTY, TEXAS

I certify I am a licensed professional engineer in the State of Texas and a *qualified professional engineer* as defined in 40 CFR §257.53. I certify that the statistical methods chosen to evaluate the groundwater monitoring data collected from the groundwater monitoring system installed at the Twin Oaks Power Station's CCR landfill, as discussed in detail in the Groundwater Sampling and Analysis Plan prepared by Hydrex Environmental and dated October 12, 2017, are appropriate and meet the requirements of 40 CFR §257.93.

Control charts are the preferred statistical evaluation method for data that demonstrate normal/transformed-normal distributions. Prediction limits are the preferred statistical evaluation method for heavy metals and radionuclides. The probability distribution and percentage of non-detects within any given data set will determine whether a non-parametric or parametric prediction interval is most appropriate. In cases where non-parametric prediction limits are not appropriate, a non-parametric rank sum test in conjunction with a contrast test will be used to evaluate the data. Trend analyses may be used as a supplement to prediction intervals and control charts. Retesting for the purpose of statistical analysis will be performed as necessary on an individual well/constituent basis and will generally follow a 1-of-m approach.



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TBPE Firm Registration No. F-16721
Expires 2/28/2018

October 12, 2017
Date