

April 9, 2019
File No. 25218184.00

Ms. Jennifer Hynek
Prairie Creek Generating Station
3300 C St. Southwest
Cedar Rapids, IA 52404

Subject: Groundwater Monitoring Statistical Method Certification Update
Prairie Creek Generating Station, Cedar Rapids, Iowa

Dear Ms. Hynek:

This letter documents the selection of a statistical method for evaluating data from the groundwater monitoring system at the Prairie Creek Generating Station (PCS), in accordance with the requirements of 40 CFR 257.93(f). The selected statistical method is appropriate for evaluating the groundwater monitoring data for the coal combustion residual (CCR) closure area.

Groundwater monitoring data for the closure area will be evaluated in accordance with 40 CFR 257.93(f)(3), using a tolerance or 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 tolerance or prediction limit.

A narrative description of the selected statistical method is provided below.

Groundwater Monitoring System Information

All CCR units at PCS were closed in 2018. Following closure of the CCR units two downgradient monitoring wells were added to the groundwater monitoring system, increasing the number of downgradient wells to six. Going forward the groundwater monitoring system will monitor the closure area, which includes the following closed CCR units:

- PCS Pond 1
- PCS Pond 2
- PCS Pond 3
- PCS Pond 4
- PCS Pond 5
- PCS Pond 6
- PCS Pond 7
- PCS Discharge Pond
- PCS Beneficial Use Storage Area
- PCS Bottom Ash Pile

The groundwater monitoring system consists of two upgradient and six downgradient monitoring wells.

Narrative Description of Statistical Method

For evaluation of groundwater monitoring results under detection monitoring or assessment monitoring, statistical analysis will be conducted to evaluate whether or not there is a statistically significant increase (SSI) over background values for each required constituent. The statistical analysis will use a prediction interval approach as recommended for detection monitoring in the March 2009 United States Environmental Protection Agency Unified Guidance for Statistical Analysis



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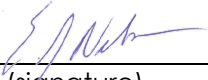
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of Groundwater Monitoring Data at RCRA Facilities. The approach will meet the statistical method requirements of 40 CFR 257.93(g).

For the prediction interval evaluation, interwell or intrawell testing will be selected based on the considerations outlined in Chapter 6 of the Unified Guidance. Background data for each parameter will be analyzed to assess whether the data fit a normal distribution or can be transformed to fit a normal distribution (e.g., lognormal). The calculation of the prediction limit(s) for each parameter will be appropriate for the distribution (parametric, parametric with transformed data, or non-parametric).

Monitoring results from the compliance wells will be compared to the upper prediction limits to evaluate whether an SSI over background has occurred. Assessment monitoring results will also be compared to the site-specific groundwater protection standards developed in accordance with 40 CFR 257.95(h).

PE Certification

	<p>I, Eric Nelson, hereby certify that that the selected statistical method for the Prairie Creek Generating Station is appropriate for evaluating the groundwater monitoring data for the CCR management area in accordance with the requirements of 40 CFR 257.93(f)(6). I am a duly licensed Professional Engineer under the laws of the State of Wisconsin.</p>
	<p> 4/09/2019</p>
	<p>(signature) (date)</p>
	<p>Eric J. Nelson (printed or typed name)</p>
	<p>License number <u>23136</u></p> <p>My license renewal date is December 31, 2020.</p> <p>Pages or sheets covered by this seal: Groundwater Monitoring Statistical Method Certification Update</p>

Sincerely,



Eric J. Nelson, PE
Senior Project Manager
SCS Engineers



Thomas J. Karwoski, PG
Senior Project Manager
SCS Engineers

MDB/lmh/EJN/TK/SCC

cc: Jeff Maxted, Alliant Energy
John Watts, Prairie Creek Generating Station