

SCS ENGINEERS

October 11, 2017
File No. 25216069.17

Mr. Jim Jakubiak
Edgewater Generating Station
3739 Lakeshore Drive
Sheboygan, WI 53081-7233

Subject: Groundwater Monitoring Statistical Method Certification
I-43 Ash Disposal Facility, Town of Wilson, Wisconsin

Dear Mr. Jakubiak:

This letter documents the selection of a statistical method for evaluating data from the groundwater monitoring system at the I-43 Ash Disposal Facility (ADF) 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 residue (CCR) management area.

Groundwater monitoring data for the I-43 ADF CCR units 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

The groundwater monitoring system at the I-43 ADF is a multiunit system. The I-43 ADF consists of three existing CCR units that are contiguous:

- Phase 3, Module 1
- Phase 3, Module 2
- Phase 4, Module 1

The multiunit system is designed to detect monitored constituents at the waste boundary of the facility as required by 40 CFR 257.91(d). The groundwater monitoring system consists of two background wells and three 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



Mr. Jim Jakubiak
October 11, 2017
Page 3

Sincerely,



Sherren C. Clark, PE
Project Director
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Thomas J. Karwoski, PG
Senior Project Manager
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SC/lmh/TK

cc: Eric Sandvig, Edgewater Generating Station
Jeff Maxted, Alliant Energy

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