

**City Water, Light & Power  
CCR Surface Impoundments**

**Groundwater Statistical Method  
Certification**  
40 CFR Section §257.93(f)(6)

**March 2024**



*Prepared for:*  
City Water, Light & Power  
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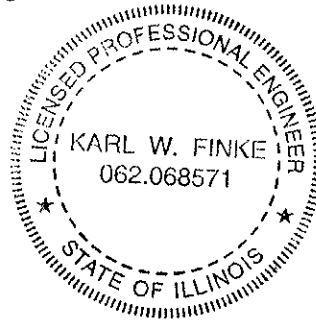
## **GROUNDWATER STATISTICAL METHOD CERTIFICATION – CCR SURFACE IMPOUNDMENTS**

City Water, Light and Power (CWLP) owns and operates two (2) existing coal combustion residual (CCR) surface impoundments located north and east of the former Lakeside Power Generating Station and Dallman Power Generating Station. The rules promulgated by the U.S. Environmental Protection Agency (EPA) pertaining to Disposal of CCR from Electric Utilities published in 40 CFR Part 257 on April 17, 2015 in Federal Register are applicable to the two surface impoundments: the Lakeside Ash Pond and the Dallman Ash Pond.

The CCR Rule, 40 CFR Subpart D – Standards for the Disposal of CCRs, Section §257.93 requires the selected statistical method be appropriate for evaluating groundwater quality changes during detection monitoring. Pursuant to §257.93(f)(3), a prediction interval procedure has been selected. The application of this method complies with the performance standards under §257.93(g), including:

- 1) Addressing the distribution of constituents where normal distributions will use parametric methods and non-normal distributions will use non-parametric methods;
- 2) Addressing the effectiveness of this approach by considering the number of samples in the background database, the data distribution, and the range of concentrations values for each constituent of concern;
- 3) Establishing the practical quantitation limit as the lowest concentration level that can be reliably achieved during routine laboratory operating conditions; and
- 4) Allowing for the correction of seasonal and spatial variability as well as temporal correlation in the data.

The above information is contained in the Groundwater Monitoring Program maintained in the facility operating record. The selected statistical method (i.e., prediction interval procedure) for evaluating the groundwater monitoring data for the Lakeside and Dallman Ash Ponds meets the requirements of 40 CFR Section §257.93.



*Karl W. Finke*

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Date

License Expires: November 30, 2025