## GROUNDWATER MONITORING SYSTEM CERTIFICATION CCR LANDFILL: LAKELAND ELECTRIC - C.D. MCINTOSH POWER PLANT CCR UNIT: BYPRODUCT STORAGE AREA

GEOSYNTEC CONSULTANTS, INC. ("Consultant") has been retained by Lakeland Electric to prepare the following assessment of whether the above-referenced coal combustion residuals ("CCR") landfill meets the groundwater monitoring system design and construction requirements set forth in 40 C.F.R. § 257.91. Presented below are the project background, assessment, limitations, and certification.

## BACKGROUND

Pursuant to 40 C.F.R. § 257.90(b), owners and operators of new and existing CCR landfills, and new and existing CCR surface impoundments, and all lateral expansions of a CCR unit must install a groundwater monitoring system. 40 C.F.R. § 257.91 requires owners and operators of a CCR unit to install a groundwater monitoring system that, relying on site-specific technical information, consists of a sufficient number of wells, installed at appropriate locations and depths, to yield groundwater samples from the uppermost aquifer that accurately represent the quality of background groundwater that has not been affected by leakage from the CCR unit and accurately represent the quality of groundwater passing the waste boundary of the CCR unit.

Pursuant to 40 C.F.R. § 257.91(f), the owner or operator must obtain a certification from a qualified professional engineer stating that the groundwater monitoring system has been designed and constructed to meet the requirements of 40 C.F.R. § 257.91, including the performance standards specified in 40 C.F.R. § 257.91(a), based on the site-specific information specified in 40 C.F.R. § 257.91(b).

In support of Consultant's assessment, Consultant completed an evaluation of the groundwater monitoring system for the above-referenced CCR unit and determined that sufficient information is available to make the certification required under 40 C.F.R. § 257.91(f).

## LIMITATIONS

The signature of Consultant's authorized representative on this document represents that to the best of Consultant's knowledge, information, and belief in the exercise of its professional judgment, it is Consultant's professional opinion that the aforementioned information is accurate as of the date of such signature. Any opinion or decisions by Consultant are made on the basis of Consultant's experience, qualifications, and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data, and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

## CERTIFICATION

I, Todd Anderson, being a Registered Professional Engineer, in accordance with the Florida Professional Engineer's Registration, do hereby certify to the best of my knowledge, information, and belief, that the groundwater monitoring system including two (2) background wells (CCR-1 and CCR-2) and nine (9) compliance wells (CCR-4 through CCR-9 and CCR-11 through CCR-13) for the CCR unit that is the subject of this certification dated 17 December 2021 has been designed and constructed to meet the requirements of 40 C.F.R. § 257.91, and that this certification is true and correct and has been prepared in accordance with generally accepted good engineering practices.



Digitally signed by Todd D. Anderson, P.E. Date: 2021.12.17 16:35:58 -05'00'

SIGNATURE

DATE 17 December 2021

This document has been electronically signed and sealed by Todd D. Anderson, PE on 17 December 2021 using a digital signature. Printed copies of this document are not considered signed and sealed and the SHA authentication code must be verified on any electronic copies.