GENERAL WASTE & RECYCLING, LLC SW-620
INDUSTRIAL WASTE LANDFILL

Statistical Analysis Plan for Groundwater Monitoring Data

Prepared For:

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Project Number: 6385CC

"I certify under penalty of law that this document and all attachments were prepared under my direct supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete." I certify that this groundwater stasistical analysis plan for the General Waste Industrial Waste Landfill described in this report meets all requirements put forth by 40 CFR §257.93 'Groundwater Sampling and Analysis Requirements.'

10-13-17

Evan Johnson, P.E. Date
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1.0 Purpose

Per 40 CFR 257.93 'Groundwater Sampling and Analysis Requirements' (the rule), a statistical procedure for assessing collected groundwater data as to whether or not a release has occurred must implemented at all CCR units. The rule outlines five (5) statistical methods that may be utilized for analyzing collected data. The statistical procedure utilized should account for spatial variance, temporal trends, and address the handling of non-detect data. This Statistical Analysis Plan has been prepared to meet the requirements of the rule and provide the framework for analyzing the collected groundwater data at the General Waste & Recycling, LLC facility (the facility) in Keewatin, Minnesota.

2.0 Initial Background Monitoring

2.1 Background Monitoring Parameters

The rule requires background monitoring of all CCR monitoring wells and eight (8) groundwater monitoring events must be completed prior to October 17, 2017. For this Statistical Analysis Plan, background monitoring includes monitoring for all parameters listed in Appendix III and Appendix IV of 40 CFR 257.93 (see Table 1 and Table 2, respectively).

2.2 Background Data Analysis

Per the rule, within 90 days of collecting the final background dataset, statistical analysis of the data is to be completed. Statistical analysis can be any of those allowed by the rule and should establish a means of determining if a Statistically Significant Inscrease (SSI) of a monitored parameter occurs during operation of the CCR unit to help determine if a leak or release has occurred from the CCR unit.

2.3 Establishing Background Dataset

2.3.1 Summary Statistics and Distribution

Once the final background dataset has been collected, summary statistics should be computed, including mean and variance. An analysis of the data set be conducted to see if data is parametric (normally distributed). A Shapiro-Wilk analysis should be completed to make this determination. This should be completed for each parameter at each well installation. If the data is skewed and does not pass the normality test, the data may be able to be transformed to a normal distribution via lognormal plotting.

If a normal distribution cannot be achieved naturally or by transformation, non-paremetric statistics may be utilized.

2.3.2 Interwell and Intrawell Analysis

It is recommended that the primary method of determining if a SSI has occurred at the site utilize an interwell analysis. This analysis will look at the dataset of the upgradient well (background well) to determine the Upper Prediction Limit (UPL), for the downgradient well concentrations. However, if spatial variation is present in the monitoring system, it may be necessary to assess data from an intrawell analysis. This analysis looks at the background dataset for a specific parameter in the same well to determine if a SSI has occurred. Both methods are viable and can be used for specific parameters. It is not necessary to have a single analysis type for all wells for all parameters at the facility.

Care should be taken when conducting an interwell analysis when the background dataset for downgradient wells may be affected by pre-existing CCR impacts. Given the timeframe of placed CCR materials at the facility, the estimated groundwater velocity, and the monitoring well locations, none of the existing monitoring wells would be expected to exhibit any signs of CCR impact. However, analysis should be completed for any future wells installed.

2.3.3 Upper Prediction Limit

Per the recommendation from the USEPA "Statistical Analysis of Groundwater Monitoring Data At RCRA Facilities Unified Guidance (2009)" (Unified Guidance) document, Upper Prediction Limits (UPL) will be utilized to assess for a SSI in the downgradient wells the facility. The UPL is calculated as follows:

$$UPL = x + ks$$

Where:
x = mean parameter concentration of background dataset
s = standard deviation of background dataset
k = site specific multiplier provided by the Unified Guidance Tables 19, depends on number of wells, number of parameters to be analyzed, size of background dataset

The UPL statistical method allows for both interwell and intrawell comparison.

2.4 Analyzing for Trends

Trends in data may occur due to natural temporal factors, but are not expected to be seen in the initial background dataset. Trend analysis should be completed for the background datasets. If a trend does exist, this should trigger an analysis to assess the potential cause of the trend (especially upward trends of monitored concentrations) and determination of the method to correct for the trend in the statistical approach.

Trend analysis to determine if a statistically significant trend exists can be completed by utilizing the Theil-Sen slope analysis with Mann-Kendall trend test ($\alpha = 0.05$) (non-parametric, more suitable for datasets with >20% non-detect results) or a Ordinary Least Squares (OLS) linear regression with Student's t-test ($\alpha = 0.01$) (parametric dataset, <20% non-detect results).

2.5 Non-Detect Data

Datasets that have less than 20% non-detect data may substitute the reporting limit divided by 2 (RL/2 method) for non-detect results for statistical analysis.

Datasets that contain 20-50% non-detect data must utilize the Kaplan-Meier method to compute summary statistics for the dataset.

Datasets that contain more than 50% non-detect data will not be able to compute summary statistics data reliably. It is recommended that the UPL be set to the highest or second highest observed value.

If all background data are non-detect, than the UPL shall be set to the highest Reporting Limit (RL) (assuming a reasonable RL have been reported that are below MCL concentrations).

2.6 Outliers

The dataset should be analyzed for outlier datapoints. This can be done visually by examining a time series plot of the data or by a box-and-whisker plot. If a datapoint appears to be an outlier, field notes, lab reports, and analysis programs should be checked for indications of erroneous data or transcription erros.

Numerical methods of determining an outlier may include a 3-sigma analaysis for parametric data (data point outside of 3 standard deviations) or the following for non-parametric data if the data point x is:

$$x > x'_{.75} + 3 * IQR$$

Where:

X = individual data point
$x'_{.75}$ = Third Quartile
IQR = $x'_{.75} - x'_{.25}$ (InterQuartile Range)

Datapoints determined to be outliers due to erroneous data collection may be removed from the dataset. Datapoints that appear to be representative data but are extreme may be excluded from the statistical analysis, but should remain in the data for future evaluation if the data set significantly changes.

2.7 Duplicate Samples

Duplicate samples collected for quality control means should not be included in the statistically analyzed dataset as they are not physically independent and will inappropriately skew the data.

3.0 Detection Monitoring

Following the completion of the background monitoring, detection monitoring will be initiated at the facility. Detection monitoring is to be conducted semiannually (preferably in the spring and

fall) and analyzed for Appendix III parameters only. Statisitcal analysis of the data must be completed within 90 days of receiving laboratory data.

3.1 Stastically Significant Increase

3.1.1 Two Sample Test

Two sample testing indicates that if a UPL (either interwell or intrawell) is exceeded for a parameter, then a second sample should be collected and analyzed. If analysis of the second sample indicates a concentration below the UPL, then a SSI has not occurred. If the second sample indicates a value above the UPL, then a SSI has occurred.

Three Sample Testing which would require 3 consecutive samples to indicate concentrations above the UPL for a SSI to be indicated may be appropriate for specific situations. One situation would be if False Positive readings (Type II error) appears to be exceeding 10% of the total dataset.

3.1.2 Pracitical monitoring Practice

Downgradient constituents should be compared to the established UPL determined from the upgradient well data (for interwell comparisons) or compared to the UPL determined from the segregated background dataset for the individual well (intrawell comparison). If a parameter exceeds a UPL, a second sample should be collected from the well and analyzed. If the second sample indicates a value above the UPL, then it can be determined that a SSI has occurred and Assessment monitoring should be initiated.

3.1.3 Responding to an SSI

If the statistical evaluation indicates a SSI has occurred, the data should be further evaluated to determine if the the SSI is likely caused by a CCR unit release and assessment monitoring should be initiated or if other factors of influence can be demonstrated to be taking effect. This demonstration must be certified by a qualified professional engineer within 90 days of completing the statistical evaluation (in addition to the 90 day requirement for conducting the statistical analysis).

4.0 Assessment Monitoring

Assessment monitoring occurs once evaluation of Detection Monitoring parameters (Appendix III) indicates a SSI and there is reason to believe that the SSI could indicate a release from a CCR unit. Assessment monitoring must begin within 90 days of determining that a SSI related to a potential release of the CCR unit has occurred.

4.1 Monitoring Parameters

The initial assessment monitoring event must include all parameters listed in Appendix III and Appendix IV of 40 CFR 257.93 at all monitoring well locations. Subsequent monitoring events may include Appendix III parameters and only the Appendix IV parameters that were detected in the initial monitoring event. Assessment monitoring will also be conducted on a semi-annual basis (e.g., spring and fall monitoring events).

4.2 Groundwater Protection Standard

A Groundwater Protection Standard (GWPS) must be established for each Appendix IV parameter. For parameters for which the USEPA has established a Maximum Contaminant Level (MCL), the MCL (shown on Tables 1 and 2) shall be used for the GWPS. For the parameters for which a MCL has not been established, then the Upper Tolerance Limit (UTL) ($\alpha = 0.05$, 95% coverage) of the parameter utilizing the upgradient (background) well(s) shall be utilized to establish a GWPS for the specific parameter. This determined UTL concentration shall be applied site-wide for all downgradient wells.

4.3 Move to Corrective Action

The UPL and UTL are useful to assess for a SSI or measurable increase above background. However, in order to assess if a dataset has stastically exceeded a set value (the GWPS), Confidence Limits would be the most appropriate. If the Lower Confidence Limit (LCL) of the Assessment Monitoring dataset exceeds the GWPS, then movement into Corrective Action is warranted.

This Statistical Analysis Plan does not address Corrective Action methods of monitoring. Corrective Action methods will be developed if required per the rule..

4.4 Return to Detection Monitoring

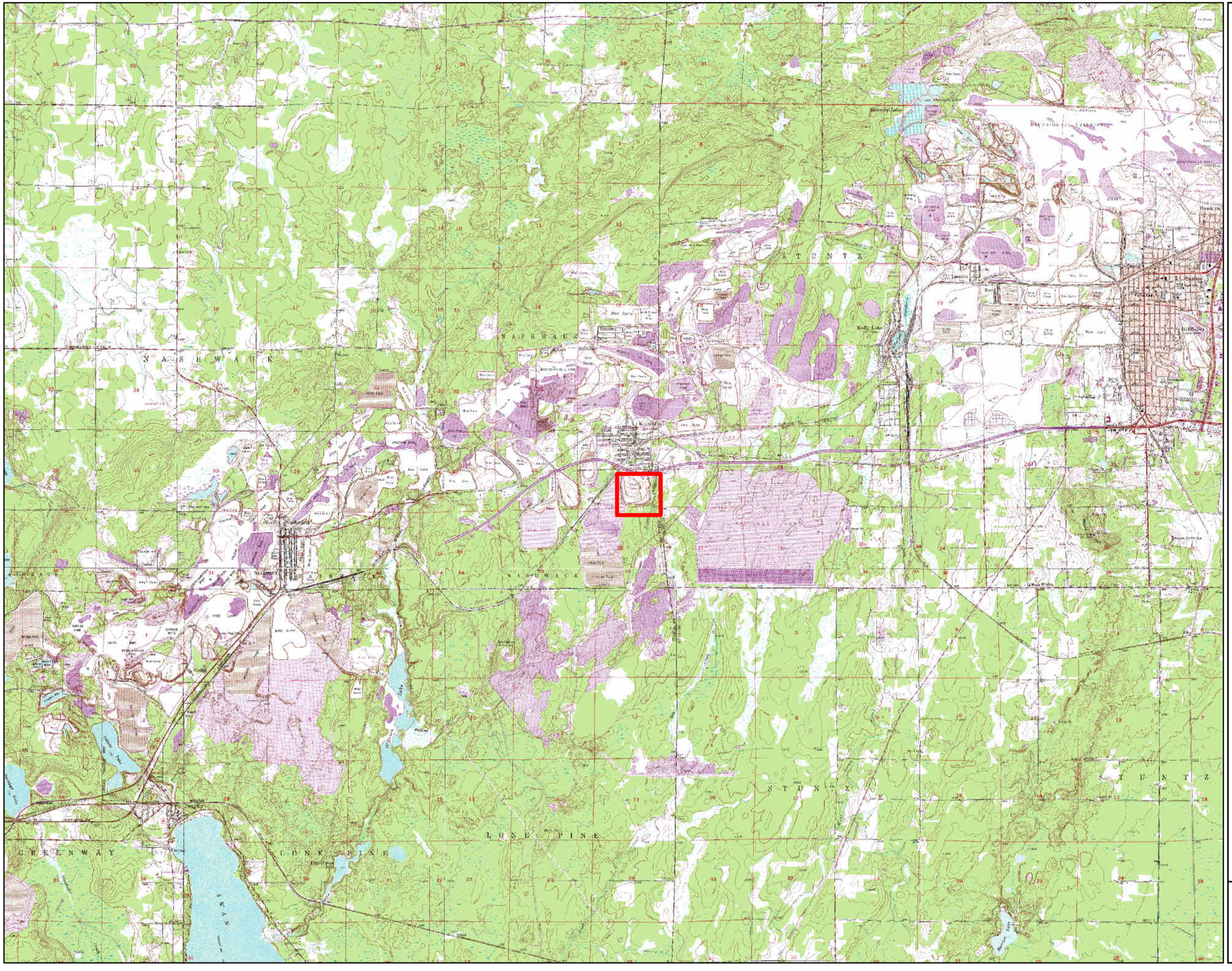
Assessment monitoring may cease and detection monitoring be re-initiated when all Appendix III and monitored Appendix IV parameters are below background (upgradient well) concentrations.

5.0 Updating Background Data

Background datasets should be updated every 2 years assuming that a SSI has not occurred. A Student t-test (α=0.01, parametric) or Mann-Whitney ($\alpha = 0.05$, non-parametric) should be utilized to assess if the existing background dataset and the dataset to be added to the background dataset are statisctically different. If the data is shown not to be significantly different, the dataset should be pooled and the background dataset updated. If analysis of the data using the t-test or Mann-Whitney test indicates a statistical difference, the data should be analyzed to determine a potential cause for the stastistically significant difference.

TABLE 1 Appendix III Parameters	
Parameter	**MCL**
Boron	NA
Calcium	NA
Chloride	NA
Fluoride	4.0 mg/L
pH	NA
Sulfate	NA
Total Dissolved Solids (TDS)	NA

TABLE 2 Appendix IV Parameters	
Parameter	**MCL**
Antimony	0.006 mg/L
Arsenic	0.01 mg/L
Barium	2.0 mg/L
Beryllium	0.004 mg/L
Cadmium	0.10 mg/L
Chromium	0.10 mg/L
Cobalt	NA
Fluoride	4.0 mg/L
Lead	0.015 mg/L
Lithium	NA
Mercury	0.002 mg/L
Molybdenum	NA
Selenium	0.05 mg/L
Thallium	0.002 mg/L
Radium 226 and 228 combined	5 pCi/L



N

0 3,000 6,000 12,000

Feet

1 Inch = 6,000 Feet

Legend

Project Location

Notes:

-Background image has been provided by MNGEO Web Services

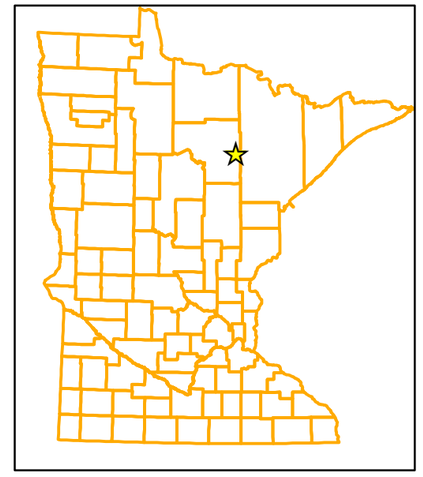


Figure 1
Site Location Map

General Waste Industrial Landfill
Statistical Analysis Plan **Certification**
Keewatin, MN (St. Louis)

Environmental Science & Engineering
www.netechnical.com

Date Drawn :
October 4, 2017

Drawn By :
Evan Johnson

NTS Project #:
6385CC

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