7. Certification

Engineer's Certification of Statistical Methods
Greenidge Power Generating Station
C-Pond CCR Surface Impoundment

1. Compliance Requirement

EnSol, Inc. has been retained by Greenidge Generation LLC to review and revise the existing statistical methods used to evaluate groundwater monitoring data for the C-Pond CCR surface impoundment. The statistical methods were evaluated against the requirements of the CCR Rule under 40 CFR § 257.93(f) and (g) in which, the owner or operator must select an appropriate statistical analysis for each monitoring parameter at each monitoring well that complies with the stated performance standards.

2. Findings

The revised statistical methods demonstration establishes an interwell approach using separate background populations representative of the overburden and bedrock groundwater units. The demonstration applies prediction limits for detection monitoring and confidence limit procedures for assessment and corrective action monitoring. The selected methods account for data distribution, percentage of non-detects, outliers, temporal trends, false-positive control, and statistical power. Based on this review the methods are appropriate for evaluating groundwater monitoring data for C-Pond and satisfy the requirements of 40 CFR § 257.93(f) and (g).

3. Certification

I hereby certify that I have reviewed the statistical methods demonstration for C-Pond, located at the Greenidge Power Generating Station owned and operated by Greenidge Generation LLC, and the requirements in federal regulation 40 CFR § 257.93 – Groundwater sampling and analysis requirements published April 17, 2015 and last amended on July 30, 2018. The statistical methods demonstration has been designed and constructed to use the statistical analysis methods specified for CCR units in 40 CFR § 257.93(f) and the meet the performance standards of 40 CFR § 257.93(g). Any future modifications to the statistical methods demonstration will be certified and added to the facility's operating record.

I am a duly licensed professional engineer in the State of New York.

David A. Lenox, P.E.
NYSPE LIC # 0933384

10/2/2026

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