concentrations for each Appendix IV[2] constituent.[3] The 2019 Statistical Analysis Report is included in Appendix A and covers the three CCR Units at PAF.

The sampling results used to identify potential groundwater protection standards exceedances were obtained during four monitoring events that were performed between January and October of 2019.[4] Comparisons were made against a fixed groundwater protection standard via a confidence interval band. Retesting was conducted after each semiannual sampling event and none of the individual compliance point measurements were directly compared against the groundwater protection standard. The Appendix IV monitoring data collected in Year-One (2017), Year-Two (2018), and Year-Three (2019)[5] were used to construct the confidence interval bands. Cross-sections of each confidence interval band were then compared to the groundwater protection standard for the most recent assessment monitoring event in each case for the purpose of identifying any SSLs. A well-constituent pair is considered out of compliance only if its average constituent level, as estimated via the confidence interval cross-section, currently exceeds the groundwater protection standard. During 2019 Assessment Monitoring, one arsenic-related SSL was recorded at monitoring well PAF-119 (as in Year-Two 2018 Assessment Monitoring) and is summarized in Table 6. This is the same SSL at the same well as was previously identified.

NARRATIVE DISCUSSION OF ANY TRANSITION BETWEEN MONITORING PROGRAMS

An Assessment Monitoring Program was established on August 15, 2018 and implemented as specified in 40 CFR § 257.95. Notification of the assessment monitoring program was provided to the State of Kentucky and placed on the CCR Rule Compliance Data and Information website (https://www.tva.gov/Environment/Environmental-Stewardship/Coal-Combustion-Residuals) in accordance with 40 CFR § 257.106(h)(4) and 40 CFR § 257.107(h)(4), respectively.

In accordance with assessment monitoring program requirements, subsequent sampling and analysis of all wells in the certified monitoring network for Appendix III and IV constituents occurred in accordance with 40 CFR § 257.95(d)(1). Appendix III and IV constituent concentrations from 2019 assessment monitoring are summarized in Table 1. Groundwater protection standards were established in accordance with 40 CFR § 257.95(d)(2) and are summarized along with Appendix IV SSLs in Table 6. During 2019 Assessment Monitoring, one arsenic-related SSL above the groundwater protection standard was recorded at monitoring well PAF-119, which is the same SSL for arsenic identified during 2018 assessment monitoring. TVA will continue to review new data as it becomes available and implement changes to the groundwater monitoring program as necessary to maintain compliance with 40 CFR § 257.90 through 257.98.

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2 Appendix IV CCR Constituents: antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, fluoride, lead, lithium, mercury, molybdenum, selenium, thallium, radium 226 and radium 228 combined

3 USEPA has published MCLs or alternate regulatory limits for each of the Appendix IV constituents. Consequently, in most cases the groundwater protection standard is equal to the MCL. However, there may be cases where background levels of a constituent exceed the MCL. In these instances, an alternate groundwater protection standard must be derived from on-site background levels. On July 30, 2018, EPA provided alternate regulatory limits (i.e., that could be used as potential groundwater protection standards) for four of the Appendix IV chemical Constituents of Interest (COIs) for which the agency has not assigned MCLs to date. If site-specific background levels are lower, then these may be used in place of background levels under CFR § 257.95(h)(2). Specifically, those alternate COIs include threshold values at the following levels: 1.) Cobalt - 6 µg/L; 2.) Lithium - 40 µg/L; 3.) Molybdenum – 100 µg/L; and, 4.) Lead - 15 µg/L.

4 The CCR rule requires a minimum of two semiannual sampling events per well once the required background data has been obtained. In 2019, two semiannual assessment monitoring groundwater sampling events were each followed by retesting groundwater sampling events.

5 The September/October 2019 retest groundwater sampling event that followed the second semiannual sampling event was not included in the statistical evaluation. This information will be included in the statistical evaluation of 2020 assessment monitoring sampling events.

STATISTICAL ANALYSIS REPORT

PARADISE FOSSIL PLANT

2019

1/15/2020

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Tables

1 Introduction

This report summarizes the statistical analysis performed on groundwater quality constituents monitored during the Coal Combustion Residuals (CCR) Rule's 2019 Annual Groundwater Monitoring (GWM) Program for the Tennessee Valley Authority (TVA) Paradise Fossil Plant (PAF). The 2019 Annual GWM Program is the third year of the program. Statistically significant increases (SSIs) were identified for one or more parameters based on the 2017 annual groundwater sampling results; therefore, the CCR Units transitioned to the Assessment Monitoring phase of the monitoring program.

Baseline datasets collected during the first year of monitoring were combined with data collected in 2018 and 2019 and were used to establish statistically-derived Groundwater Protection Standards (GWPS) for each Unit located at PAF. Consistent with methods presented in USEPA's Unified Guidance document on the statistical analysis of groundwater monitoring data (2009), confidence-interval (CI) bands were compared against relevant GWPS. A statistically significant level (SSL) is found if and only if the lower limit of the CI band exceeds the GWPS for the most recent Assessment Monitoring sampling event.

At the PAF plant's CCR Units, the sampling results used to identify potential GWPS exceedances were obtained during a minimum of three distinct monitoring events that were performed between January and July of 2019 by Terracon, with laboratory analysis performed by Test America Laboratories (located at Pittsburg, PA, and St Louis, MO), and Quality Assurance Controls by Environmental Standards, Inc., all under direct contracts to TVA.

The current CCR Rule groundwater monitoring networks — one for the Gypsum Stack area, one for the Peabody area, and one for the Slag Pond area — as Certified by a Professional Engineer at the firm of AECOM or other, are presented in **Table 1**.

Table 1. CCR Rule Monitoring Well Networks

Site	Background		Downgradient	
Gypsum Stack	95-48A PAF-101 PAF-104		94-35A PAF-114 PAF-103	PAF-115 PAF-116
Peabody Ash Pond	95-48A 10-5	PAF-105 PAF-106	PAF-119 10-6 PAF-118	PAF-117 PAF-107 10-4
Slag Ponds Area	95-48A PAF-108	PAF-109	PAF-110 95-47C	PAF-113 PAF-112

The 'R' Statistical Analysis package (www.r-project.org) in conjunction with R-Studio (www.rstudio.com) (both popular public domain software products) and other analytical tools were used in the production of the statistical values and graphs. ProUCL data dumps from

TVA's EQuIS Professional and Enterprise Database were used to populate the R-based statistical analyses.

Groundwater samples collected as part of the CCR Rule monitoring program were analyzed for constituents listed in Appendix IV of the CCR Rule. Only non-filtered sample results were utilized for the statistical analysis of Appendix IV constituents. As high turbidity measurements during the purging of wells (e.g., values above 5 NTUs) have the propensity to increase the concentrations of Appendix IV constituents, filtered samples were also collected to better understand and/or dispel the potential source(s) of falsely-named GWPS exceedances. A summary of constituents included in the data analysis is provided in the second column of **Table 2.**

Table 2. CCR Rule Monitored Constituents

Appendix III Constituents (Detection Monitoring)	Appendix IV Constituents (Assessment Monitoring)
Boron	Antimony
Calcium	Arsenic
Chloride	Barium
Fluoride	Beryllium
pH (field)	Cadmium
Sulfate	Chromium
Total Dissolved Solids (TDS)	Cobalt
	Fluoride
	Lead
	Lithium
	Mercury
	Molybdenum
	Radium 226 + 228
	Selenium
	Thallium

2 Statistical Analysis

The Assessment Monitoring analysis includes the following steps:

1) Developing GWPS for each Appendix IV constituent. The GWPS is the published MCL/water quality limit or the background concentration (95% UTL with 95% coverage), whichever is larger;
2) Computing trends and associated CI bands for each downgradient well location and Appendix IV constituent (i.e., each well-constituent pair); and
3) Comparing each CI band against its respective GWPS to assess whether an exceedance occurred.

2.1 Developing Groundwater Protection Standards (GWPS)

According to the promulgated CCR Rule (80 Federal Register 21302, 21405, April 17, 2015):

“For each appendix IV constituent that is detected, a groundwater protection standard must be set. The groundwater protection standards must be the MCL or the background concentration level for the detected constituent, whichever is higher. If there is no MCL promulgated for a detected constituent, then the groundwater protection standard must be set at background.”

On July 17, 2018, EPA unofficially promulgated alternate regulatory limits (i.e., potential GWPS) for four of the Appendix IV chemical Constituents of Interest (COIs) for which the agency has not assigned MCLs to date. In the absence of MCLs or site-specific GWPS, those may be used in place of background levels under 257.95(h)(2). Specifically, those alternate COIs include threshold values at the following health-based levels:

1. Cobalt - 6 µg/L
2. Lithium - 40 µg/L
3. Molybdenum – 100 µg/L
4. Lead - 15 µg/L.

An Upper Tolerance Limit (UTL) with 95% confidence and 95% coverage was calculated using pooled site-specific background data for each Appendix IV parameter. Then these UTLs were compared against the promulgated regulatory limits to determine the site-specific GWPS.

To handle any non-detects in these calculations, non-detect values were treated as statistically ‘left-censored,’ with the censoring limit equal to the reporting limit (RL). Then the Kaplan-Meier adjustment method (USEPA, 2009) was employed to derive estimated summary statistics that account for the presence of non-detects.

For PAF, **Table 3, included below,** lists the calculated UTLs and final GWPS established for CCR Units.

Table 3A. PAF, Gypsum Stack, Groundwater Protection Standards (GWPS)

COI	N	ND.PCT	MODEL	COV	CONF	UTL	UNITS	MCL	GWPS
Antimony	57	94.7	NP	0.95	0.946	0.0024	mg/L	0.006	0.006
Arsenic	57	0	NP	0.95	0.946	0.0154	mg/L	0.01	0.0154
Barium	57	14	NP	0.95	0.946	0.2510	mg/L	2	2
Beryllium	57	66.7	Square	0.95	0.950	0.0011	mg/L	0.004	0.004
Cadmium	57	100	NP	0.95	0.946	0.0010	mg/L	0.005	0.005
Chromium	57	91.2	Fourth Root	0.95	0.950	0.0034	mg/L	0.1	0.1
Cobalt*	57	3.5	NP	0.95	0.946	0.0995	mg/L	0.006	0.0995
Fluoride	60	5	Square Root	0.95	0.950	0.6192	mg/L	4	4
Lead	57	87.7	Tenth Root	0.95	0.950	0.0014	mg/L	0.015	0.015
Lithium*	57	0	NP	0.95	0.946	0.1700	mg/L	0.04	0.17
Mercury	57	100	NP	0.95	0.946	0.0002	mg/L	0.002	0.002
Molybdenum*	57	35.1	NP	0.95	0.946	0.0092	mg/L	0.1	0.1
Rad226+228	57	0	Cube Root	0.95	0.950	3.8391	pCi/L	5	5
Selenium	57	91.2	Square	0.95	0.950	0.0020	mg/L	0.05	0.05
Thallium	57	94.7	NP	0.95	0.946	0.0010	mg/L	0.002	0.002

* No potential Health Effects provided for these Constituents of Interests (COI)

Table 4B. PAF, Peabody, Groundwater Protection Standards (GWPS)

COI	N	ND.PCT	MODEL	COV	CONF	UTL	UNITS	MCL	GWPS
Antimony	76	98.7	NP	0.95	0.980	0.0049	mg/L	0.006	0.006
Arsenic	76	14.5	NP	0.95	0.980	0.0154	mg/L	0.01	0.0154
Barium	76	18.4	Square	0.95	0.950	0.0157	mg/L	2	2
Beryllium	76	75	Square	0.95	0.950	0.0011	mg/L	0.004	0.004
Cadmium	76	97.4	NP	0.95	0.980	0.0014	mg/L	0.005	0.005
Chromium	76	97.4	NP	0.95	0.980	0.0029	mg/L	0.1	0.1
Cobalt*	76	3.9	NP	0.95	0.980	0.0995	mg/L	0.006	0.0995
Fluoride	80	7.5	Log	0.95	0.950	0.5602	mg/L	4	4
Lead	76	86.8	NP	0.95	0.980	0.0031	mg/L	0.015	0.015
Lithium*	76	0	NP	0.95	0.980	0.1700	mg/L	0.04	0.17
Mercury	76	100	NP	0.95	0.980	0.0002	mg/L	0.002	0.002
Molybdenum*	76	35.5	NP	0.95	0.980	0.0050	mg/L	0.1	0.1
Rad226+228	76	0	Tenth Root	0.95	0.950	3.6056	pCi/L	5	5
Selenium	76	94.7	Log	0.95	0.950	0.0021	mg/L	0.05	0.05
Thallium	76	88.2	NP	0.95	0.980	0.0010	mg/L	0.002	0.002

Table 5C. PAF, Slag Pond, Groundwater Protection Standards (GWPS)

COI	N	ND.PCT	MODEL	COV	CONF	UTL	UNITS	MCL	GWPS
Antimony	57	98.2	NP	0.95	0.946	0.0026	mg/L	0.006	0.006
Arsenic	57	21.1	Log	0.95	0.950	0.0127	mg/L	0.01	0.0127
Barium	57	12.3	NP	0.95	0.946	0.0627	mg/L	2	2
Beryllium	57	66.7	NORMAL	0.95	0.950	0.0011	mg/L	0.004	0.004
Cadmium	57	100	NP	0.95	0.946	0.0010	mg/L	0.005	0.005
Chromium	57	98.2	NP	0.95	0.946	0.0023	mg/L	0.1	0.1
Cobalt*	57	1.8	NP	0.95	0.946	0.0995	mg/L	0.006	0.0995
Fluoride	59	5.1	Log	0.95	0.950	0.6289	mg/L	4	4
Lead	57	86	NP	0.95	0.946	0.0010	mg/L	0.015	0.015
Lithium*	57	0	NP	0.95	0.946	0.1700	mg/L	0.04	0.17
Mercury	57	100	NP	0.95	0.946	0.0002	mg/L	0.002	0.002
Molybdenum*	57	40.4	Log	0.95	0.950	0.0021	mg/L	0.1	0.1
Rad226+228	57	0	Cube Root	0.95	0.950	3.6827	pCi/L	5	5
Selenium	57	93	Log	0.95	0.950	0.0021	mg/L	0.05	0.05
Thallium	57	91.2	Square	0.95	0.950	0.0003	mg/L	0.002	0.002

To compute each UTL, the following steps were taken:

1) All baseline data - those from designated up-gradient or background wells collected from the Program's first sampling event through August of 2018 were grouped and checked for possible outliers.

   At PAF, no likely outliers among the background data were flagged at any of the CCR units.

2) The grouped baseline data were also analyzed to determine whether they could be fit to a known statistical model. If so, a parametric UTL was computed; if not, a nonparametric UTL was constructed.

   To fit potential statistical models, a series of normalizing mathematical transformations was applied to each baseline dataset. These transformations are known as power transformations, since they raise each observation to a mathematical power. The goal is to find, if possible, a transformation that normalizes the data on the transformed scale.

   Datasets which could not be sufficiently normalized were analyzed using nonparametric methods. Nonparametric UTLs do not assume a known statistical model and require larger sample sizes to achieve the target confidence level of 95%.

3) The final statistical model for each COI was used to compute an UTL with 95% coverage and 95% confidence.

   When a parametric model is appropriate, on the normalized scale, a UTL is computed using the standard normal theory equation:

$$UTL = \bar{x} + \kappa s$$

where $\bar{x}$ and s represent the mean and standard deviation of the (transformed) observations, and κ is a multiplier which depends on the number of baseline measurements, as well as the desired coverage and confidence levels. If the data have been transformed, the final UTL is derived by back-transforming the scaled UTL.

For nonparametric models, the normal theory equation does not apply. Instead, the UTL is selected as one of the largest of the sample values, typically the maximum. Because there is no multiplier as in the parametric case, the confidence level associated with a nonparametric UTL is computed 'after the fact,' based on the sample size and desired coverage level: the smaller the sample size, the lower the confidence; the bigger the sample size, the higher the confidence level.

Table 6A. Descriptive Summary Statistics of Background Data, Gypsum Stack

Constituent	Unit	N	No. of NDs	Minimum	Maximum	Mean	Median
Antimony	mg/L	57	54	0.0007	0.0024	0.0012	0.0019
Arsenic	mg/L	57	0	0.0032	0.0154	0.0067	0.0066
Barium	mg/L	57	8	0.0046	0.2510	0.0128	0.0129
Beryllium	mg/L	57	38	0.0002	0.0012	0.0007	0.0007
Cadmium	mg/L	57	57	0.0010	0.0010	0.0005	0.0010
Chromium	mg/L	57	52	0.0006	0.0045	0.0012	0.0016
Cobalt	mg/L	57	2	0.0003	0.0995	0.0288	0.0036
Fluoride	mg/L	60	3	0.1410	0.6530	0.3405	0.3480
Lead	mg/L	57	50	0.0001	0.0023	0.0003	0.0003
Lithium	mg/L	57	0	0.0457	0.1700	0.0870	0.0591
Mercury	mg/L	57	57	0.0002	0.0002	0.0001	0.0002
Molybdenum	mg/L	57	20	0.0009	0.0092	0.0029	0.0015
Rad226+228	pCi/L	57	0	0.1210	3.3700	1.2544	1.0200
Selenium	mg/L	57	52	0.0009	0.0050	0.0014	0.0014
Thallium	mg/L	57	54	0.0001	0.0010	0.0001	0.0002

Notes:
1. ND = not detected above the laboratory reporting limit.
2. All computations involving non-detects handled using the Kaplan-Meier adjustment. In the case of 100% NDs, mean is computed by substituting half the reporting limit for each ND.

Table 7B. Descriptive Summary Statistics of Background Data, Peabody

Constituent	Unit	N	No. of NDs	Minimum	Maximum	Mean	Median
Antimony	mg/L	76	75	0.0004	0.0049	0.0004	0.0027
Arsenic	mg/L	76	11	0.0006	0.0154	0.0055	0.0060
Barium	mg/L	76	14	0.0046	0.2800	0.0103	0.0107
Beryllium	mg/L	76	57	0.0002	0.0012	0.0007	0.0007
Cadmium	mg/L	76	74	0.0001	0.0014	0.0002	0.0006
Chromium	mg/L	76	74	0.0009	0.0029	0.0009	0.0020
Cobalt	mg/L	76	3	0.0004	0.0995	0.0239	0.0032
Fluoride	mg/L	80	6	0.1230	0.6530	0.3102	0.2900
Lead	mg/L	76	66	0.0001	0.0031	0.0002	0.0001
Lithium	mg/L	76	0	0.0355	0.1700	0.0794	0.0631
Mercury	mg/L	76	76	0.0002	0.0002	0.0001	0.0002
Molybdenum	mg/L	76	27	0.0005	0.0050	0.0023	0.0016
Rad226+228	pCi/L	76	0	0.1330	3.3700	1.1478	0.8760
Selenium	mg/L	76	72	0.0013	0.0050	0.0015	0.0014
Thallium	mg/L	76	67	0.0001	0.0010	0.0001	0.0001

Table 8C. Descriptive Summary Statistics of Background Data, Slag Pond

Constituent	Unit	N	No. of NDs	Minimum	Maximum	Mean	Median
Antimony	mg/L	57	56	0.0008	0.0026	0.0008	0.0018
Arsenic	mg/L	57	12	0.0006	0.0154	0.0032	0.0022
Barium	mg/L	57	7	0.0046	0.0627	0.0282	0.0363
Beryllium	mg/L	57	38	0.0003	0.0012	0.0007	0.0007
Cadmium	mg/L	57	57	0.0010	0.0010	0.0005	0.0010
Chromium	mg/L	57	56	0.0009	0.0023	0.0009	0.0020
Cobalt	mg/L	57	1	0.0002	0.0995	0.0303	0.0072
Fluoride	mg/L	60	3	0.0891	1.1000	0.2960	0.2390
Lead	mg/L	57	49	0.0001	0.0010	0.0003	0.0001
Lithium	mg/L	57	0	0.0251	0.1700	0.0800	0.0500
Mercury	mg/L	57	57	0.0002	0.0002	0.0001	0.0002
Molybdenum	mg/L	57	23	0.0005	0.0050	0.0011	0.0010
Rad226+228	pCi/L	57	0	0.3950	3.3700	1.5620	1.4800
Selenium	mg/L	57	53	0.0013	0.0050	0.0015	0.0014
Thallium	mg/L	57	52	0.0001	0.0010	0.0001	0.0002

2.2 Computing Trend Lines and Confidence Interval Bands

The USEPA's Unified Guidance recommends comparing some type of CI against a GWPS in order to assess whether or not the limit has been exceeded with statistical significance. If the entire interval exceeds the GWPS, an SSL is identified. If none of the interval, or only part, exceeds the GWPS, no SSL is recorded.

Since groundwater data are collected over time, variation in the measurements may be due to a trend. To account for this possibility, USEPA also recommends a variation on the confidence interval method known as a confidence interval band around a trend line. In this case, a (linear) trend line is first fit to the data, then a confidence band is constructed around the trend line. The confidence interval band can be compared against a GWPS in much the same fashion as a confidence interval, only now a comparison can be made at different points in time by comparing the 'cross-section' of the band for a given sampling date. If the interval represented by the confidence band cross-section fully exceeds the GWPS, an SSL is identified for that sampling event.

At PAF, CI bands were constructed using equations [21.24] and [21.25] of Section 21.3 in the Unified Guidance for each well-constituent pair using all data collected through September of 2018. Cross-sections of each band were then compared to the GWPS for the most recent Assessment Monitoring event in each case for the purpose of identifying any SSLs.

For well-constituent pairs with no non-detects, linear regression and the formula above were used to construct each confidence band with 98% overall confidence, corresponding to a lower confidence limit with 99% confidence. When non-detects are present, the same formulas apply but an adjustment must be made for the censored measurements. The strategy adopted for TVA's CCR sites involves the following steps:

1) Each non-detect is assumed to follow a triangle distribution centered at half the (sample-specific) reporting limit, and with limits extending from zero to the reporting limit. Then an imputation for each non-detect is randomly drawn from this distribution;
2) The combined set of detected values and imputed non-detects are used to estimate a linear regression trend line and associated confidence band with 98% statistical confidence;
3) Steps (1) and (2) are repeated 500 times, each time with a different set of random imputations, leading to 500 potentially different trend lines and confidence bands;
4) The 500 sets of trends lines and bands are averaged point-wise (i.e., at each time along a sequence of dates spanning the time range of the data) to compute the final trend and confidence band estimates.

By repeating this sequence of steps a large number of times (500), the uncertainty associated with the non-detects can be reasonably captured within the final CI band estimate.

2.2.1 Outliers

Prior to constructing any of the CI bands, the data at each well-constituent pair were examined for possible outliers. Any possible outliers were then tested using Rosner's outlier test. For the PAF CCR units, three observations were confirmed as outliers in the Gypsum Stack network, four outliers were identified in the Peabody area network, and three outliers were confirmed in the Slag Pond network. All of these observations were excluded from subsequent statistical calculations. Table 5 lists the outliers confirmed using Rosner's test.

Table 5. Confirmed Statistical Outliers at PAF CCR Sites

Site	Constituent	Units	Outlier Value	Well Location	Sampling Date
Gypsum Stack	Barium	mg/L	0.0361	PAF-104	05-02-2017
	Barium	mg/L	0.515	PAF-115	03-07-2019
	Barium	mg/L	1.42	PAF-116	03-07-2019
Peabody	Arsenic	mg/L	0.0506	10-4	06-29-2017
	Barium	mg/L	0.184	PAF-118	01-19-2017
	Barium	mg/L	0.384	PAF-107	11-30-2016
	Fluoride	mg/L	1.51	10-4	03-09-2017
Slag Pond	Fluoride	mg/L	1.1	PAF-109	03-09-2017
	Fluoride	mg/L	0.48	PAF-110	08-21-2018
	Fluoride	mg/L	1.66	PAF-113	02-10-2017

2.3 Comparing Confidence Interval Bands Against GWPS

To assess whether any SSLs occurred during the 2018 Assessment Monitoring at PAF, the CI bands were compared against the constituent-specific GWPS. An SSL was identified if and only if the CI band fully exceeded the GWPS at the *most recent* sampling event.

3 Summary of Statistical Analysis

To facilitate an ‘at-a-glance’ summary of the statistical comparison results, **Table 6** is a set of ‘traffic light’ matrices, showing for each CCR network a compact representation of each well location matched against each constituent in Appendix IV. This summary is useful in planning for mitigation actions. Green cells indicate that no SSL was observed in 2018. Red cells indicate that an SSL was flagged during the most recent sampling events. Yellow cells are warnings which indicate that a well-constituent pair should be closely watched. These cases have increasing trends and a CI band whose lower limit is at least 65% of the GWPS. Often, the CI band cross-section straddles the GWPS in yellow cells.

At the PAF Gypsum Stack CCR Unit (Table 6A), no SSLs were recorded during Assessment Monitoring. Warning flags (yellow) were raised for cobalt and lithium at well 93-48A, for beryllium at well PAF-114, and for lithium at PAF-116. In summary, a total of zero SSLs and four warnings were identified across the network wells that are located near the PAF plant’s Gypsum Stack CCR Unit during the Assessment Monitoring.

At the PAF Peabody Ash Pond CCR Unit (Table 6B), one arsenic-related SSL was recorded at well PAF-119 during Assessment Monitoring. Warning flags (yellow) were raised for cobalt and lithium at well 95-48A. In summary, a total of one SSL and two warnings were identified across the network wells that are located near the PAF plant’s Peabody Ash Pond CCR Unit during the Assessment Monitoring.

At the PAF Slag Ponds CCR Unit (Table 6C), one arsenic-related SSL was recorded at well PAF-113 during Assessment Monitoring. Warning flags (yellow) were raised for cobalt and lithium at well 95-48A, and for arsenic at PAF-112. In summary, a total of one SSL and three warnings were identified across the network wells that are located near the PAF plant’s Slag Ponds CCR Unit during the Assessment Monitoring.

Table 6A. PAF Gypsum Stack - Traffic Light Matrix Based on Comparative Analysis of Statistical Analysis Results versus Groundwater Protection Standards (GWPS)

ITEM No.	Constituent of Interest	TRAFFIC LIGHT MATRIX							
		GROUNDWATER QUALITY MONITORING WELL LOCATIONS							
		95-48A	PAF-101	PAF-104	94-35A	PAF-114	PAF-103	PAF-115	PAF-116
1.	Antimony	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
2.	Arsenic	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
3.	Barium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
4.	Beryllium	GREEN	GREEN	GREEN	GREEN	YELLOW	GREEN	GREEN	GREEN
5.	Cadmium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
6.	Chromium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
7.	Cobalt	YELLOW	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
8.	Fluoride	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
9.	Lead	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
10.	Lithium	YELLOW	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	YELLOW
11.	Mercury	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
12.	Molybdenum	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
13.	Rad226+228	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
14.	Selenium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
15.	Thallium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN

COLOR-CODING KEY:	
	Monitored data for the specific COI are deemed to fall below GWPS
	Monitored data are deemed to fall below GWPS, but an internal warning is issued to TVA staff that CI band lower limit is at least 65% of the GWPS.
	Monitored data for the specific COI are deemed to exceed GWPS

Table 6B. PAF Peabody Ash Pond - Traffic Light Matrix Based on Comparative Analysis of Statistical Analysis Results versus Groundwater Protection Standards (GWPS)

ITEM No.	Constituent of Interest	TRAFFIC LIGHT MATRIX									
		GROUNDWATER QUALITY MONITORING WELL LOCATIONS									
		95-48A	10-5	PAF-105	PAF-106	PAF-119	10-6	PAF-118	PAF-117	PAF-107	10-4
16.	Antimony	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
17.	Arsenic	GREEN	GREEN	GREEN	GREEN	RED	GREEN	GREEN	GREEN	GREEN	GREEN
18.	Barium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
19.	Beryllium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
20.	Cadmium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
21.	Chromium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
22.	Cobalt	YELLOW	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
23.	Fluoride	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
24.	Lead	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
25.	Lithium	YELLOW	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
26.	Mercury	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
27.	Molybdenum	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
28.	Rad226+228	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
29.	Selenium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
30.	Thallium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN

COLOR-CODING KEY:	
	Monitored data for the specific COI are deemed to fall below GWPS
	Monitored data are deemed to fall below GWPS, but an internal warning is issued to TVA staff that CI band lower limit is at least 65% of the GWPS.
	Monitored data for the specific COI are deemed to exceed GWPS

Table 6C. PAF Slag Pond - Traffic Light Matrix Based on Comparative Analysis of Statistical Analysis Results versus Groundwater Protection Standards (GWPS)

ITEM No.	Constituent of Interest	TRAFFIC LIGHT MATRIX						
		GROUNDWATER QUALITY MONITORING WELL LOCATIONS						
		95-48A	PAF-108	PAF-109	PAF-110	95-47C	PAF-113	PAF-112
31.	Antimony	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
32.	Arsenic	GREEN	GREEN	GREEN	GREEN	GREEN	RED	YELLOW
33.	Barium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
34.	Beryllium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
35.	Cadmium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
36.	Chromium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
37.	Cobalt	YELLOW	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
38.	Fluoride	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
39.	Lead	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
40.	Lithium	YELLOW	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
41.	Mercury	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
42.	Molybdenum	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
43.	Rad226+228	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
44.	Selenium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN
45.	Thallium	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN	GREEN

COLOR-CODING KEY:	
	Monitored data for the specific COI are deemed to fall below GWPS
	Monitored data are deemed to fall below GWPS, but an internal warning is issued to TVA staff that CI band lower limit is at least 65% of the GWPS.
	Monitored data for the specific COI are deemed to exceed GWPS

4 References

1) US Environmental Protection Agency (2009) *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities Unified Guidance* - Office of Resource Conservation and Recovery EPA 530/R-09-007

2) US Environmental Protection Agency (2007) *Framework for Metals Risk Assessment* EPA 120/R-07/001 Office of the Science Advisor Risk Assessment Forum, Washington, DC 20460