

# **APPENDIX E – STATISTICAL ANALYSES**

**APPENDIX E.1**  
**STATISTICAL ANALYSIS OF BACKGROUND SOIL DATA**





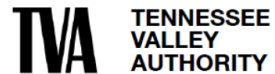
**Appendix E.1 – Statistical  
Analysis of Background Soil  
Data**

TDEC Commissioner's Order:  
Environmental Assessment Report  
Kingston Fossil Plant  
Harriman, Tennessee

March 12, 2024

Prepared for:

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## APPENDIX E.1 – STATISTICAL ANALYSIS OF BACKGROUND SOIL DATA

### REVISION LOG

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0	EAR Submittal to TDEC	May 30, 2023
1	Addresses August 16, 2023 TDEC Review Comments and Issued for TDEC	November 14, 2023
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## Sign-off Sheet

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**ATTACHMENT E.1-B      BOX PLOTS**



## Abbreviations

BGS	Background Soil
BTVs	Background Threshold Values
CASRN	Chemical Abstracts Service Registry Number
CCR	Coal Combustion Residuals
CCR Parameter	Constituents listed in Appendices III and IV of 40 CFR 257 and five inorganic constituents included in Appendix I of Tennessee Rule 0400-11-01-.04
CCR Rule	Title 40, Code of Federal Regulations, Part 257
EAR	Environmental Assessment Report
EI	Environmental Investigation
ft bgs	Feet Below Ground Surface
IQR	Interquartile Range
KIF Plant	Kingston Fossil Plant
NA	Not Available
%	Percent
SAR	Sampling and Analysis Report
Stantec	Stantec Consulting Services Inc.
TDEC	Tennessee Department of Environment and Conservation
TVA	Tennessee Valley Authority
UTLs	Upper Tolerance Limits



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### 1.0 INTRODUCTION

Stantec Consulting Services Inc. (Stantec) prepared this statistical analysis report on behalf of the Tennessee Valley Authority (TVA) to summarize the statistical analyses performed on background soil (BGS) data to support evaluations conducted for the Environmental Assessment Report (EAR) at the Kingston Fossil Plant (KIF Plant) located in Harriman, Tennessee. The BGS samples were collected as part of the Tennessee Department of Environment and Conservation (TDEC) Order Environmental Investigation (EI) between March 2019 and February 2020 in the vicinity of the KIF Plant from locations where naturally occurring, *in situ*, native soils unaffected by Coal Combustion Residual (CCR) materials were present. Further details regarding the BGS sampling program and results are available in the *KIF Plant Background Soil Investigation Sampling and Analysis Report (SAR)* (Appendix F.1), including the BGS investigation boring locations (Exhibit A.2), and a list of the BGS investigation borings and associated soil samples and analyses (Table B.1).

21 samples were excluded from the statistical analysis datasets for being collected in the saturated zone. The Constituents listed in Appendices III and IV of 40 CFR 257 and five inorganic constituents included in Appendix I of Tennessee Rule 0400-11-01-.04 (CCR Parameters) included in the analysis are presented below in Table E.1-1.



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**Table E.1-1 – CCR Parameters Evaluated in Statistical Analysis**

Parameter	CASRN
<b>CCR Rule Appendix III Parameters</b>	
Boron	7440-42-8
Calcium	7440-70-2
Chloride	16887-00-6
Fluoride <sup>1</sup> (also Appendix IV)	16984-48-8
pH	NA
Sulfate	14808-79-8
TDS	NA
<b>CCR Rule Appendix IV Parameters</b>	
Antimony	7440-36-0
Arsenic	7440-38-2
Barium	7440-39-3
Beryllium	7440-41-7
Cadmium	7440-43-9
Chromium	7440-47-3
Cobalt	7440-48-4
Lead	7439-92-1
Lithium	7439-93-2
Mercury	7439-97-6
Molybdenum	7439-98-7
Radium-226+228	13982-63-3/ 15262-20-1
Selenium	7782-49-2
Thallium	7440-28-0
<b>TDEC Appendix I Parameters</b>	
Copper	7440-50-8
Nickel	7440-02-0
Silver	7440-22-4
Vanadium	7440-62-2
Zinc	7440-66-6
<b>Other</b>	
% Ash	NA

**Notes:** CASRN - Chemical Abstracts Service Registry Number; CCR Rule - Title 40, Code of Federal Regulations, Part 257; NA - Not available; % - Percent

<sup>1</sup>Fluoride is both a CCR Rule Appendix III and CCR Rule Appendix IV parameter. In this table, and in the results presented herein, fluoride has been grouped with the Appendix III parameters only to avoid duplication.

The following sections present the methods and results from general exploratory data analysis using summary statistics, data plots, outlier screening methods and the calculation of Background Threshold Values (BTVs).

## 2.0 METHODS

The statistical evaluation for the BGS data collected at the KIF Plant for the EI was conducted in two parts: 1) exploratory data analysis and 2) calculation of site-specific BTVs. The analyses relied on available background soil data collected as part of the BGS EI. Quality assurance and quality control samples (e.g. field duplicates) were excluded from the statistical analysis.



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## 2.1 EXPLORATORY DATA ANALYSIS

Exploratory data analysis is the initial step of statistical analysis. It utilizes simple summary statistics (e.g. mean, median, standard deviation and percentiles) and graphical representations to identify important characteristics of an analytical dataset, such as the center of the data (mean, median), variation, distribution, spatial patterns, presence of outliers, and randomness.

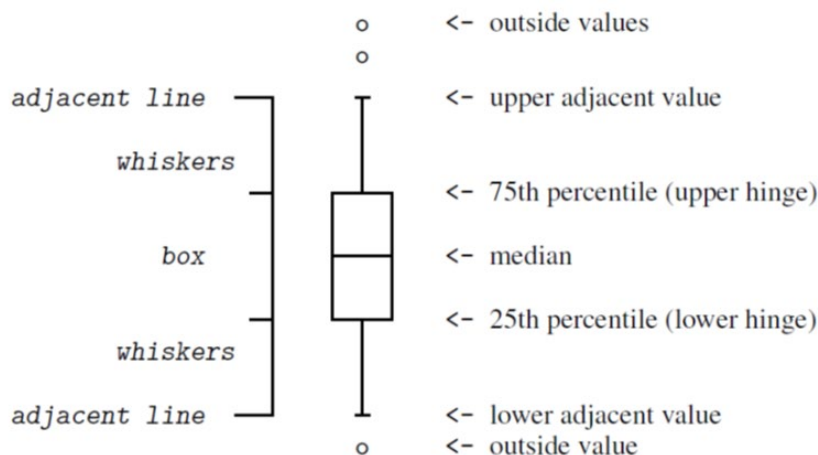
For the EI, surficial soil samples were typically collected at depths ranging from 0.0 to approximately 0.5 feet below ground surface (ft bgs). In addition to the CCR parameters (Table E.1-1), these samples were analyzed for the presence of CCR Material (% Ash). Along with surficial samples, the field sampling personnel collected approximately two feet of soil from each five-foot soil run (one foot in both directions from the midpoint of the five-foot interval) for the total depth of the boring. For the statistical analysis, soil depths were aggregated into the following depth intervals: surficial (0 to approximately 0.5 ft bgs), approximately 0.5 to less than or equal to 10 ft bgs, and greater than 10 ft bgs.

### 2.1.1 Summary Statistics

Summary statistics were calculated for each CCR Parameter grouped by depth interval and the entire set of BGS samples (including all depth intervals and boring locations). Summary statistics include information such as the total numbers of available samples, the frequencies of detection, ranges of reporting limits, minimum and maximum detected concentrations, mean concentrations, standard deviations, median concentrations and the 95<sup>th</sup> percentile concentrations. A summary statistics table is presented in Attachment E.1-A.

### 2.1.2 Exploratory Data Plots

Exploratory data plots (box plots) were constructed to support a visual review of the data. Box plots identify the center of the data, distribution, variability, and to visually identify potential outliers. The diagram below graphically depicts the basics of the construction of the box plots (StataCorp LLC 2017).





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The box portion of the plot is the interquartile range (IQR), which represents the middle 50% of data, with the bottom of the box being the 25<sup>th</sup> percentile and the top of the box being the 75<sup>th</sup> percentile. The line inside the box is the median concentration. The top of the upper “whisker” represents the first observed concentration above the 75<sup>th</sup> percentile, whereas the bottom of the lower “whisker” represents the first observed concentration below the 25<sup>th</sup> percentile (upper adjacent value and lower adjacent value, respectively). Values that lie outside of the adjacent values represent outside concentrations (i.e. concentrations at the upper and lower ends of the distribution of the data). The method detection limit was used as the reported value in order to construct the box plot when analytical results were reported as non-detects.

Two sets of side-by-side box plots were constructed for the BGS CCR Parameter data: 1) results by depth interval and 2) results by BGS boring location. These box plots were useful in identifying differences in CCR Parameter concentrations between depth intervals and between boring locations and were especially useful for visually identifying potential outliers. Box plots for CCR Parameters aggregated by depth interval and by boring location are provided in Attachment E.1-B.

### 2.1.3 Outlier Screening

Outliers are data points that are abnormally high or low as compared to the rest of the measurements and may represent anomalous data or data errors, but may also represent natural variation of CCR Parameter concentrations in environmental systems. Screening for outliers is a critical step because outliers can bias statistical estimates, statistical testing results, and inferences. The size of the datasets for each depth interval (a minimum of 10 samples) were sufficiently large to capture natural variation commonly seen in environmental datasets.

Outlier values were initially screened visually using the side-by-side box plots. If suspected visual outliers were identified, then Tukey’s procedure was used to identify extreme outliers (Tukey 1977). This method relies on the IQR, which is defined as the 75<sup>th</sup> percentile value minus the 25<sup>th</sup> percentile value.

Values were identified as potential outliers as follows:

- **Lower extreme outliers** are less than the 25<sup>th</sup> percentile minus 3 x IQR
- **Upper extreme outliers** are greater than the 75<sup>th</sup> percentile plus 3 x IQR.

Finally, when the potential outlier(s) were identified visually and by Tukey’s procedure, then statistical testing for outliers (Dixon or Rosner’s Test) was conducted to determine if the data points were statistically significant outliers.

Following confirmation of the outliers as statistically significant, a desktop evaluation was conducted to verify that the data points were not errors (e.g., laboratory or transcriptional error). Field forms, data validation reports, and other variables in the dataset that could influence analytical results were also evaluated. If a verifiable error was discovered, the outlier was removed and, if possible, replaced with a corrected value.



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In the absence of a verifiable error, additional lines of evidence were reviewed to determine final outlier disposition (e.g., frequency of detection, spatial and temporal variability). If an outlier was identified as suitable for removal from further statistical analysis, a clear and defensible rationale based on multiple lines of evidence was provided. In addition, values that were identified as outliers and removed from further evaluation in the present statistical analysis were retained in the historical database and will be reevaluated for inclusion or exclusion in future statistical analyses of this dataset. The results of the outlier screening for the CUF Plant CCR material dataset are provided in Section 3.1.

## 2.2 ESTIMATES OF BACKGROUND CONDITIONS

BTVs were calculated as conservative estimates of CCR Parameter concentrations in BGS. Specifically, 95% upper tolerance limits (UTLs) with 95% coverage were calculated for each parameter at each soil depth interval defined for the statistical datasets and with all depths combined to establish conservative estimates of background soil concentrations. The UTL represents the upper bound of a pre-specified proportion of the underlying data population with a specified level of confidence. For example, for a “95% UTL with 95% coverage”, there is 95% confidence that, on average, 95% of the data are below the UTL. The upper one-sided UTL is commonly used in environmental monitoring and is constructed using background data (Ofungwu 2014). In the case of pH, 95% tolerance intervals with 95% coverage were calculated to bound the range of pH values. BTVs aggregated by soil depth interval and with all depths combined are presented in Attachment E.1-A.

### 2.2.1 Tests for Normality of Background Data

Prior to the calculation of UTLs, the data were evaluated for normality. Parametric methods to establish background conditions (UTLs) can be applied to data that are normally distributed or to data that fit another defined statistical distribution (e.g. gamma distribution), or to data that can be transformed to normal using mathematical transformations (e.g. lognormal transformation). Testing data for normality was done using formal statistical methods, known as goodness-of-fit-testing (e.g. Shapiro-Wilk or Lilliefors tests). If the data did not fit a defined statistical distribution or could not be transformed to normal, then non-parametric methods were used.

### 2.2.2 Parametric UTLs

Parametric UTLs were used when the background data were normally distributed, gamma distributed, or transformed using the lognormal transformation. A background sample size or dataset consisting of at least eight observations was required to generate an adequate tolerance limit.

The calculation of the UTL is straightforward:

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

Where:

$\bar{x}$  = mean CCR parameter concentration in the background dataset

s = standard deviation of CCR parameter in the background dataset

$\tau$  = multiplier based on size of dataset, confidence (95%) and desired coverage (95%).



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### 2.2.3 Non-parametric UTLs

When the background data do not fit the normal or gamma distribution or cannot be normalized via the lognormal transformation, non-parametric UTLs were used. The non-parametric UTL is an order statistic, typically the maximum or the second largest observed concentration in the background dataset. Unlike parametric methods, the desired coverage and confidence interval cannot be pre-specified for non-parametric tolerance limits. In the case of non-parametric methods, the level of confidence increases with increasing sample size. If non-parametric methods were used, the approximate level of confidence was reported.

UTLs, especially non-parametric UTLs, are sensitive to outliers and are biased high in the presence of outliers. For this initial analysis, no suspect outliers were removed from the data set. If the UTLs presented in this report are going to be used to inform corrective actions, then additional analysis to account for the presence of outliers is warranted.

## 3.0 RESULTS AND DISCUSSION

### 3.1 SUMMARY STATISTICS, EXPLORATORY DATA PLOTS, AND OUTLIER SCREENING

Summary statistics for each CCR Parameter are provided in Attachment E.1-A, with results aggregated by depth interval and with all depths combined. Summary statistics are sorted by CCR Parameter type (i.e., CCR Rule Appendix III Parameters, CCR Rule Appendix IV Parameters, TDEC Appendix I Parameters, and Other). Box plots for each CCR Parameter aggregated by depth and boring location are provided in Attachment E.1-B.

The number of values identified as potential outliers using Tukey's procedure for each depth interval and with all depths combined is identified in Attachment E.1-A. For these potential outliers, no definitive reasons were identified for the outlier values and the values identified were assumed to be representative of natural conditions and natural variation within native soil. These values were flagged as statistical outliers in the dataset and retained for subsequent calculations and analysis if needed for future evaluations (see columns labelled "Number of Statistical Outliers" and "Number of Outliers Removed" in Attachment E.1-A).

### 3.2 ESTIMATES OF BACKGROUND CONDITIONS

BTVs for the BGS investigation at the KIF Plant were calculated using UTLs (and Tolerance Intervals in the case of pH). The resulting BTV concentrations and the statistical distribution and methods used to calculate the UTLs are identified for each CCR Parameter aggregated by depth interval and with all depths combined in Attachment E.1-A.



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### 4.0 REFERENCES

Ofungwu, J. (2014), *Statistical Applications for Environmental Analysis and Risk Assessment*. Hoboken, New Jersey: John Wiley and Sons, Inc.

StataCorp. (2017), *Stata Graphics Reference Manual Stata: Release 15*. Statistical Software. College Station, TX: StataCorp LLC.

Tukey, J.W. (1977), *Exploratory data analysis*. Reading, Massachusetts: Addison-Wesley, 1977.



**ATTACHMENT E.1-A  
SUMMARY STATISTICS TABLES**

Summary Statistics - Background Soil Investigation Kingston Fossil Plant - Harriman, Tennessee																
Parameter	Soil Depth	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using all Detects & Non-Detects									
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	25 <sup>th</sup> Percentile	50 <sup>th</sup> Percentile	75 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile	Number of Statistical Outliers	Number of Outliers Removed	Background Threshold Value	Statistical Distribution & Method
Percent Ash																
Ash	Surficial	11/12	(1 - 1)	8.3%	1	5	2.67	1.31	1.75	2.50	4.00	4.45	0	0	NA	NA
CCR Rule Appendix IV Parameters																
Boron	Surficial	10/14	(1.53 - 1.85)	28.6%	1.68	9.51	3.36	2.37	1.73	2.58	3.41	8.01	2	0	11.0	95% WH Approximate Gamma UTL 95% Coverage
	0.5' to 10' bgs	12/20	(1.6 - 1.81)	40.0%	1.84	7.99	2.88	1.82	1.68	1.98	3.42	6.72			7.23	95% UTL (Normal) 95% Coverage
	>10' bgs	10/19	(1.54 - 1.74)	47.4%	1.83	12.9	3.17	2.76	1.64	1.83	3.40	8.16			10.2	95% WH Approximate Gamma UTL 95% Coverage
	All Depth	32/53	(1.53 - 1.85)	39.6%	1.68	12.9	3.10	2.35	1.68	2.06	3.52	7.77			8.32	95% KM UTL (Lognormal) 95% Coverage
Calcium	Surficial	14/14	--	0.0%	260	15,400	3,390	5,000	654	1,040	3,690	14,600	4	0	22,100	95% WH Approximate Gamma UTL 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	35.6	13,500	1,280	2,990	62.9	232	973	3,080			17,500	95% (Lognormal) 95% Coverage
	>10' bgs	19/19	--	0.0%	23.1	1,000	186	243	36.5	67.6	235	628			1,520	95% (Lognormal) 95% Coverage
	All Depth	53/53	--	0.0%	23.1	15,400	1,450	3,340	66.6	260	906	8,020			10,900	95% (Lognormal) 95% Coverage
Chloride	Surficial	2/14	(4.37 - 5.62)	85.7%	4.37	6.34	4.51	0.507	4.54	4.70	5.12	5.87	8	0	6.34	95% UTL (NP-51.2%) 95% Coverage
	0.5' to 10' bgs	4/20	(4.11 - 5.25)	80.0%	6.83	15.6	5.44	3.06	4.59	4.77	5.18	12.2			15.6	95% UTL (NP-64.2%) 95% Coverage
	>10' bgs	6/19	(4.48 - 5.67)	68.4%	6.78	19.3	7.03	4.51	4.53	4.89	7.30	16.8			19.3	95% UTL (NP-62.3%) 95% Coverage
	All Depth	12/53	(4.11 - 5.67)	77.4%	4.37	19.3	5.66	3.49	4.53	4.76	5.28	14.0			16.5	95% UTL (NP-75%) 95% Coverage
Fluoride	Surficial	10/14	(0.792 - 0.831)	28.6%	0.869	3.76	1.77	1.01	0.841	1.35	2.56	3.54	9	0	4.40	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	5/20	(0.761 - 0.903)	75.0%	1.15	3.17	1.13	0.736	0.807	0.824	0.965	2.75			3.17	95% UTL (NP-64.2%) 95% Coverage
	>10' bgs	1/19	(0.715 - 1.11)	94.7%	4.40	4.40	0.91	0.823	0.793	0.833	0.944	1.44			4.40	95% UTL (NP-62.3%) 95% Coverage
	All Depth	16/53	(0.715 - 1.11)	69.8%	0.869	4.40	1.20	0.922	0.800	0.840	1.15	3.27			3.76	95% UTL (NP-75%) 95% Coverage
pH (lab)	Surficial	14/14	--	0.0%	5.4	7.8	6.6	0.88	5.8	6.7	7.4	7.7	0	0	(4.0-9.1)	95% Tolerance Interval (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	4.6	8.1	5.7	1.1	5.1	5.4	6.3	8.1			(4.6-8.1)	95% Tolerance Interval (NP-64.2%) 95% Coverage
	>10' bgs	19/19	--	0.0%	4.6	7.2	5.2	0.56	5.0	5.2	5.4	5.8			(3.7-6.8)	95% Tolerance Interval (Lognormal) 95% Coverage
	All Depth	53/53	--	0.0%	4.6	8.1	5.8	1.0	5.1	5.4	6.5	7.7			(4.6-8.1)	95% Tolerance Interval (NP-75%) 95% Coverage
pH (field)	Surficial	14/14	--	0.0%	5.20	7.49	6.35	0.789	5.70	6.05	6.92	7.47	0	0	(4.09-8.60)	95% Tolerance Interval (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	4.02	7.86	5.47	1.05	4.75	5.12	5.96	7.76			(2.53-8.40)	95% Tolerance Interval (Gamma) 95% Coverage
	>10' bgs	19/19	--	0.0%	4.07	6.79	5.01	0.619	4.73	5.02	5.22	5.75			(3.40-6.63)	95% Tolerance Interval (Normal) 95% Coverage
	All Depth	53/53	--	0.0%	4.02	7.86	5.54	0.986	4.87	5.25	5.89	7.47			(3.20-7.87)	95% Tolerance Interval (Lognormal) 95% Coverage
Sulfate	Surficial	13/14	(9.83 - 9.83)	7.1%	8.35	30.1	19.0	7.90	10.7	19.1	27.1	29.5	1	0	39.6	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	13/20	(7.86 - 8.53)	35.0%	14.3	213	31.7	43.9	8.31	22.0	32.9	63.2			131	95% WH Approximate Gamma UTL 95% Coverage
	>10' bgs	4/19	(7.14 - 11.1)	79.0%	12.6	25.6	9.73	5.45	7.92	8.56	11.1	21.3			25.6	95% UTL (NP-62.3%) 95% Coverage
	All Depth	30/53	(7.14 - 11.1)	43.4%	8.35	213	20.4	29.1	8.32	12.6	25.4	43.6			64.7	95% KM UTL (Lognormal) 95% Coverage
CCR Rule Appendix IV Parameters																
Antimony	Surficial	13/14	(0.0783 - 0.0783)	7.1%	0.0868	0.353	0.199	0.0864	0.135	0.203	0.270	0.329	0	0	0.425	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	14/20	(0.0721 - 0.0824)	30.0%	0.0727	0.345	0.161	0.0937	0.0810	0.139	0.219	0.338			0.386	95% UTL (Normal) 95% Coverage
	>10' bgs	15/19	(0.0719 - 0.0829)	21.1%	0.0775	0.502	0.185	0.127	0.0871	0.123	0.221	0.419			0.493	95% UTL (Normal) 95% Coverage
	All Depth	42/53	(0.0719 - 0.0829)	20.8%	0.0727	0.502	0.180	0.107	0.0847	0.139	0.230	0.370			0.397	95% UTL (Normal) 95% Coverage
Arsenic	Surficial	14/14	--	0.0%	2.42	11.9	5.76	2.62	3.87	5.56	6.32	10.2	2	0	12.6	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	1.59	9.16	4.80	1.94	3.08	4.79	6.14	7.40			9.44	95% UTL (Normal) 95% Coverage
	>10' bgs	19/19	--	0.0%	2.32	40.4	8.82	11.5	3.01	4.95	7.79	40.0			40.4	95% UTL (NP-62.3%) 95% Coverage
	All Depth	53/53	--	0.0%	1.59	40.4	6.49	7.20	3.08	4.97	6.30	12.3			40.0	95% UTL (NP-75%) 95% Coverage
Barium	Surficial	14/14	--	0.0%	25.6	199	93.2	49.8	50.9	90.6	120	170	0	0	223	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	16.3	251	82.7	70.6	26.2	57.1	142	191			333	95% WH Approximate Gamma UTL 95% Coverage
	>10' bgs	19/19	--	0.0%	10.0	156	49.8	42.9	18.1	24.8	75.6	133			280	95% (Lognormal) 95% Coverage
	All Depth	53/53	--	0.0%	10.0	251	73.7	58.5	24.8	58.0	107	188			308	95% (Lognormal) 95% Coverage
Beryllium	Surficial	14/14	--	0.0%	0.152	1.11	0.652	0.365	0.290	0.627	1.01	1.08	0	0	1.61	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	0.109	1.14	0.559	0.375	0.204	0.473	0.953	1.11			1.94	95% WH Approximate Gamma UTL 95% Coverage
	>10' bgs	19/19	--	0.0%	0.105	2.51	0.664	0.685	0.163	0.301	1.01	1.72			3.1	95% WH Approximate Gamma UTL 95% Coverage
	All Depth	53/53	--	0.0%	0.105	2.51	0.621	0.499	0.202	0.451	0.987	1.45			1.63	95% UTL (NP-75%) 95% Coverage
Cadmium	Surficial	13/14	(0.0211 - 0.0211)	7.1%	0.0232	0.188	0.0681	0.0465	0.0375	0.0527	0.0783	0.152	4	0	0.19	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	5/20	(0.0198 - 0.0228)	75.0%	0.0234	0.128	0.0291	0.0245	0.0205	0.0213	0.0230	0.0552			0.0877	95% UTL (Normal) 95% Coverage
	>10' bgs	6/19	(0.0194 - 0.0228)	68.4%	0.0243	0.273	0.0485	0.0637	0.0206	0.0215	0.0288	0.164			0.203	95% UTL (Normal) 95% Coverage
	All Depth	24/53	(0.0194 - 0.0228)	54.7%	0.0232	0.273	0.0462	0.0500	0.0207	0.0227	0.0478	0.141			0.143	95% WH Approximate Gamma UTL 95% Coverage

**Summary Statistics - Background Soil Investigation  
Kingston Fossil Plant - Harriman, Tennessee**

Parameter	Soil Depth	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using all Detects & Non-Detects									
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	25 <sup>th</sup> Percentile	50 <sup>th</sup> Percentile	75 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile	Number of Statistical Outliers	Number of Outliers Removed	Background Threshold Value	Statistical Distribution & Method
Chromium	Surficial	14/14	--	0.0%	6.85	38.1	21.0	9.42	14.3	17.7	29.8	34.7	0	0	45.6	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	8.55	41.1	21.1	8.99	14.6	19.4	26.1	39.7			42.7	95% UTL (Normal) 95% Coverage
	>10' bgs	19/19	--	0.0%	5.17	30.5	14.9	8.31	8.42	12.0	21.1	29.0			42.0	95% WH Approximate Gamma UTL 95% Coverage
	All Depth	53/53	--	0.0%	5.17	41.1	18.9	9.19	12.0	16.2	25.4	34.9			42.4	95% WH Approximate Gamma UTL 95% Coverage
Cobalt	Surficial	14/14	--	0.0%	1.70	27.3	12.1	7.81	6.34	11.1	18.9	22.6	0	0	32.5	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	1.33	30.6	11.5	8.80	2.05	11.2	15.3	28.2			32.6	95% UTL (Normal) 95% Coverage
	>10' bgs	19/19	--	0.0%	1.24	50.2	11.8	12.5	2.76	7.45	15.4	34.0			55.9	95% WH Approximate Gamma UTL 95% Coverage
	All Depth	53/53	--	0.0%	1.24	50.2	11.8	9.88	2.80	9.44	16.5	29.1			40.2	95% WH Approximate Gamma UTL 95% Coverage
Fluoride	Surficial	10/14	(0.792 - 0.831)	28.6%	0.869	3.76	1.77	1.01	0.841	1.35	2.56	3.54	9	0	4.40	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	5/20	(0.761 - 0.903)	75.0%	1.15	3.17	1.13	0.736	0.807	0.824	0.965	2.75			3.17	95% UTL (NP-64.2%) 95% Coverage
	>10' bgs	1/19	(0.715 - 1.11)	94.7%	4.40	4.40	0.909	0.823	0.793	0.833	0.944	1.44			4.40	95% UTL (NP-62.3%) 95% Coverage
	All Depth	16/53	(0.715 - 1.11)	69.8%	0.869	4.40	1.20	0.922	0.800	0.840	1.15	3.27			3.76	95% UTL (NP-75%) 95% Coverage
Lead	Surficial	14/14	--	0.0%	7.73	49.6	18.0	11.1	11.1	14.1	19.9	36.7	3	0	47.1	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	5.42	25.4	14.0	5.48	10.2	13.3	16.3	23.6			27.1	95% UTL (Normal) 95% Coverage
	>10' bgs	19/19	--	0.0%	3.23	61.8	17.0	15.5	7.99	11.1	19.3	47.9			63.6	95% WH Approximate Gamma UTL 95% Coverage
	All Depth	53/53	--	0.0%	3.23	61.8	16.1	11.3	9.62	12.7	18.5	40.8			40.5	95% WH Approximate Gamma UTL 95% Coverage
Lithium	Surficial	14/14	--	0.0%	3.86	23.2	11.6	6.78	6.52	8.61	17.5	21.3	0	0	29.3	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	4.77	28.5	12.8	6.52	8.76	10.7	13.8	25.2			31.7	95% WH Approximate Gamma UTL 95% Coverage
	>10' bgs	19/19	--	0.0%	2.88	26.4	9.76	7.10	4.31	6.30	14.9	24.1			41.2	95% (Lognormal) 95% Coverage
	All Depth	53/53	--	0.0%	2.88	28.5	11.4	6.80	5.79	9.40	15.1	24.3			28.8	95% WH Approximate Gamma UTL 95% Coverage
Mercury	Surficial	11/14	(0.0257 - 0.0722)	21.4%	0.0175	0.174	0.0532	0.0384	0.0387	0.0548	0.0651	0.111	0	0	0.178	95% WH Approximate Gamma UTL 95% Coverage
	0.5' to 10' bgs	13/20	(0.0155 - 0.0483)	35.0%	0.0165	0.188	0.0654	0.0556	0.0289	0.0461	0.0900	0.187			0.199	95% UTL (Normal) 95% Coverage
	>10' bgs	16/19	(0.0162 - 0.0275)	15.8%	0.0172	0.149	0.0600	0.0416	0.0275	0.0483	0.0834	0.139			0.161	95% UTL (Normal) 95% Coverage
	All Depth	40/53	(0.0155 - 0.0722)	24.5%	0.0165	0.188	0.0601	0.0469	0.0275	0.0483	0.0765	0.159			0.179	95% WH Approximate Gamma UTL 95% Coverage
Molybdenum	Surficial	14/14	--	0.0%	0.235	2.35	0.848	0.575	0.520	0.744	1.06	1.80	2	0	2.35	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	18/20	(0.19 - 0.214)	10.0%	0.284	1.30	0.624	0.321	0.383	0.630	0.706	1.22			1.39	95% UTL (Normal) 95% Coverage
	>10' bgs	15/19	(0.189 - 0.583)	21.1%	0.253	5.84	0.938	1.37	0.331	0.427	0.655	3.57			5.84	95% UTL (NP-62.3%) 95% Coverage
	All Depth	47/53	(0.189 - 0.583)	11.3%	0.235	5.84	0.796	0.899	0.343	0.568	0.886	2.07			2.55	95% KM UTL (Lognormal) 95% Coverage
Radium-226+228	Surficial	14/14	--	0.0%	1.181	3.09	2.31	0.659	1.67	2.51	2.84	2.94	0	0	4.03	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	1.618	3.56	2.58	0.585	2.07	2.80	2.94	3.34			3.98	95% UTL (Normal) 95% Coverage
	>10' bgs	19/19	--	0.0%	0.696	4.26	2.49	1.09	1.65	2.17	3.12	4.22			5.14	95% UTL (Normal) 95% Coverage
	All Depth	53/53	--	0.0%	0.696	4.26	2.48	0.810	1.70	2.59	2.95	4.02			4.13	95% UTL (Normal) 95% Coverage
Selenium	Surficial	14/14	--	0.0%	0.389	1.60	0.854	0.363	0.619	0.744	1.02	1.47	0	0	1.80	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	0.244	1.63	0.704	0.311	0.470	0.699	0.866	0.977			1.45	95% UTL (Normal) 95% Coverage
	>10' bgs	19/19	--	0.0%	0.162	1.34	0.674	0.395	0.336	0.485	0.984	1.33			2.05	95% WH Approximate Gamma UTL 95% Coverage
	All Depth	53/53	--	0.0%	0.162	1.63	0.732	0.358	0.450	0.704	0.893	1.36			1.46	95% UTL (Normal) 95% Coverage
Thallium	Surficial	14/14	--	0.0%	0.124	0.453	0.248	0.0994	0.187	0.219	0.273	0.443	2	0	0.508	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	0.127	0.417	0.230	0.0717	0.186	0.218	0.255	0.356			0.402	95% UTL (Normal) 95% Coverage
	>10' bgs	19/19	--	0.0%	0.0542	1.01	0.245	0.238	0.108	0.170	0.255	0.702			0.926	95% WH Approximate Gamma UTL 95% Coverage
	All Depth	53/53	--	0.0%	0.0542	1.01	0.240	0.155	0.164	0.200	0.259	0.458			0.621	95% (Lognormal) 95% Coverage

Summary Statistics - Background Soil Investigation Kingston Fossil Plant - Harriman, Tennessee																
Parameter	Soil Depth	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using all Detects & Non-Detects									
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	25 <sup>th</sup> Percentile	50 <sup>th</sup> Percentile	75 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile	Number of Statistical Outliers	Number of Outliers Removed	Background Threshold Value	Statistical Distribution & Method
<b>TDEC Appendix I Parameters</b>																
Copper	Surficial	14/14	--	0.0%	2.89	28.0	13.5	8.88	7.24	8.83	20.5	27.6	1	0	48.3	95% WH Approximate Gamma UTL 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	4.49	36.7	13.9	7.43	9.81	11.5	15.8	25.7			34.7	95% WH Approximate Gamma UTL 95% Coverage
	>10' bgs	19/19	--	0.0%	3.39	60.4	15.6	14.2	5.95	8.58	24.0	32.6			61.2	95% WH Approximate Gamma UTL 95% Coverage
	All Depth	53/53	--	0.0%	2.89	60.4	14.4	10.5	7.47	10.3	20.6	28.8			45.5	95% (Lognormal) 95% Coverage
Nickel	Surficial	14/14	--	0.0%	3.41	38.4	15.7	12.6	5.61	8.31	26.1	36.6	0	0	67.4	95% WH Approximate Gamma UTL 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	3.40	37.8	13.3	11.3	4.98	8.63	19.1	33.5			49.9	95% WH Approximate Gamma UTL 95% Coverage
	>10' bgs	19/19	--	0.0%	2.25	47.4	13.1	13.7	3.22	4.98	20.7	34.7			47.4	95% UTL (NP-62.3%) 95% Coverage
	All Depth	53/53	--	0.0%	2.25	47.4	13.9	12.3	4.48	7.77	21.1	36.5			38.4	95% UTL (NP-75%) 95% Coverage
Silver	Surficial	2/14	(0.0304 - 0.039)	85.7%	0.0641	0.102	0.0379	0.0198	0.0333	0.0343	0.0378	0.0774	2	0	0.102	95% UTL (NP-51.2%) 95% Coverage
	0.5' to 10' bgs	0/20	(0.0304 - 0.0362)	100.0%	--	--	--	--	0.0322	0.0332	0.0346	0.0359			0.0362	95% UTL (NP-64.2%) 95% Coverage
	>10' bgs	0/19	(0.0308 - 0.0445)	100.0%	--	--	--	--	0.0326	0.0337	0.0362	0.0434			0.0445	95% UTL (NP-62.3%) 95% Coverage
	All Depth	2/53	(0.0304 - 0.0445)	96.2%	0.0641	0.102	0.0324	0.0107	0.0325	0.0335	0.0355	0.0438			0.0641	95% UTL (NP-75%) 95% Coverage
Vanadium	Surficial	14/14	--	0.0%	12.9	32.7	25.1	5.72	21.0	25.9	28.3	32.7	0	0	40.1	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	15.2	33.6	24.7	4.38	22.2	24.2	27.1	31.5			35.2	95% UTL (Normal) 95% Coverage
	>10' bgs	19/19	--	0.0%	6.84	42.0	20.9	9.59	13.2	20.5	27.9	34.0			44.1	95% UTL (Normal) 95% Coverage
	All Depth	53/53	--	0.0%	6.84	42.0	23.4	7.13	19.9	23.8	28.0	32.9			38	95% UTL (Normal) 95% Coverage
Zinc	Surficial	14/14	--	0.0%	15.4	75.9	45.0	19.9	26.3	45.2	58.1	73.8	2	0	97.1	95% UTL (Normal) 95% Coverage
	0.5' to 10' bgs	20/20	--	0.0%	12.5	64.4	30.8	13.6	22.4	26.5	36.4	58.0			69.6	95% WH Approximate Gamma UTL 95% Coverage
	>10' bgs	19/19	--	0.0%	8.06	170	44.7	46.1	15.1	27.8	52.6	141			190	95% WH Approximate Gamma UTL 95% Coverage
	All Depth	53/53	--	0.0%	8.06	170	39.5	30.8	22.0	29.3	48.8	87.9			121	95% (Lognormal) 95% Coverage

Notes:

CCR Rule - Title 40, Code of Federal Regulations, Part 257

bgs - below ground surface

KM - Kaplan-Meier, For Parameters with non-detects reported at the method detection limit, the mean, standard deviation, and background threshold values were calculated using Kaplan-Meier methods

'--' - Not Applicable

NP-% - Non-parametric method and associated confidence level of the estimate

TDEC - Tennessee Department of Environment and Conservation

UTL - Upper Tolerance Limit

WH - Background Threshold Limits based on the gamma distribution utilize Wilson Hiferty (WH) estimates

% - Percent

Except for Ash, pH & Radium 226 + 228, all units milligrams per kilogram (mg/kg)

Units for Ash are percent (%)

Units for pH are Standard Units (S.U.)

Units for Radium 226+228 are picocuries per gram (pCi/g)

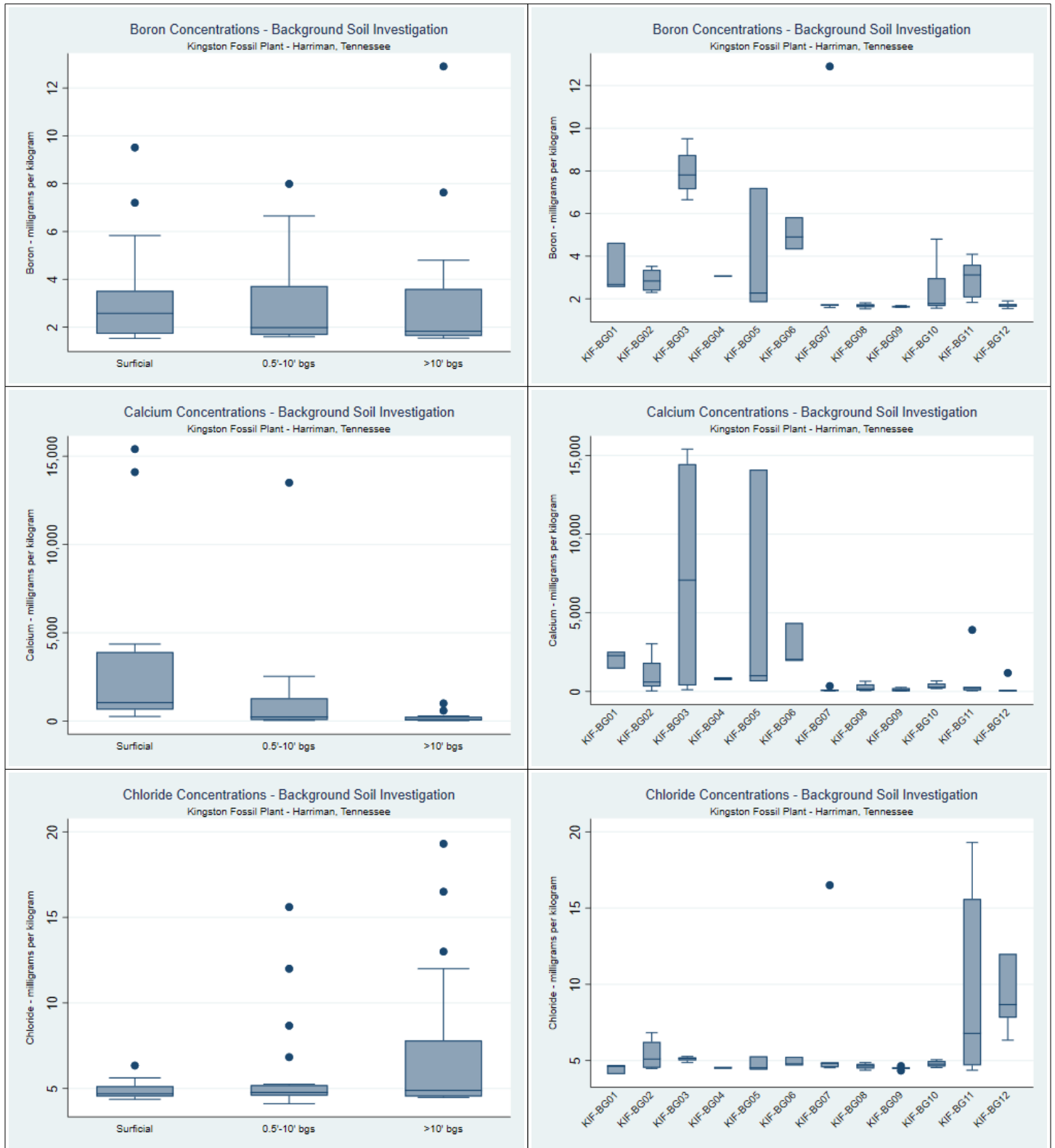
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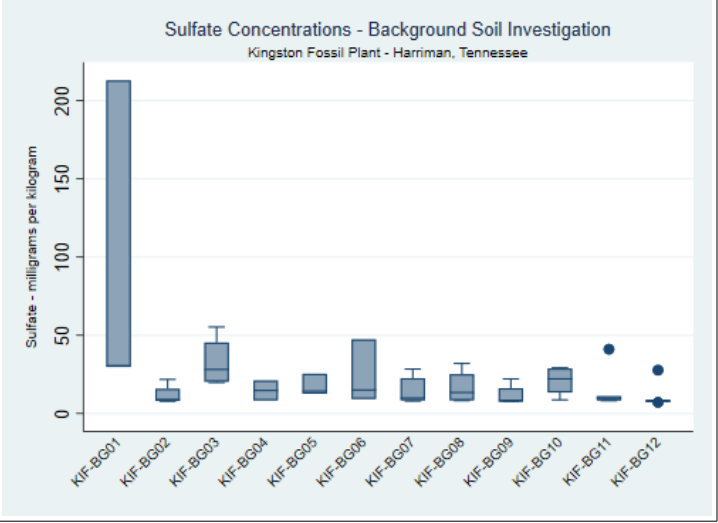
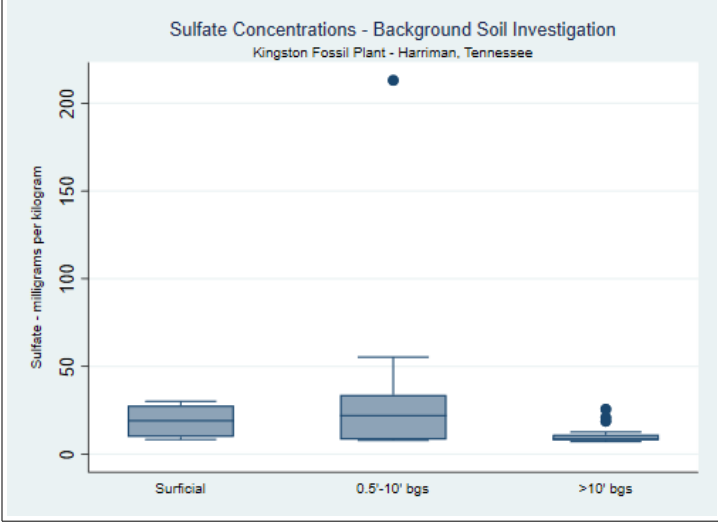
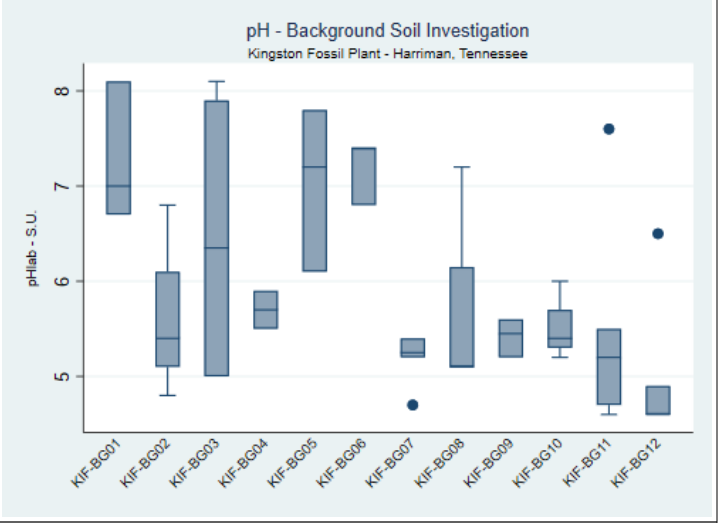
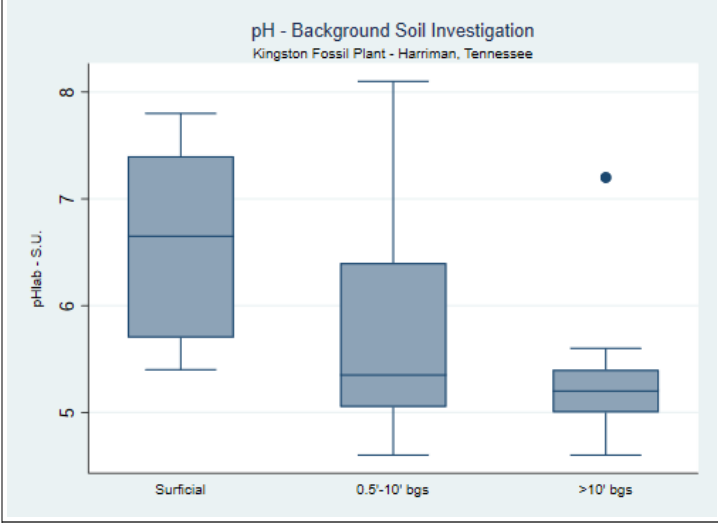
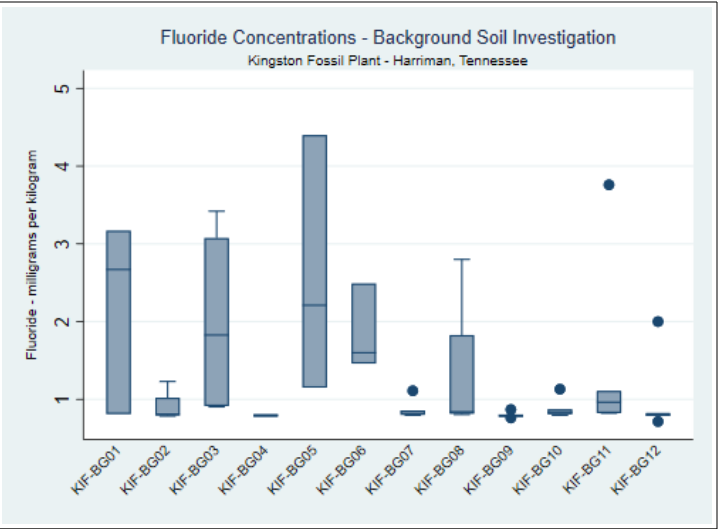
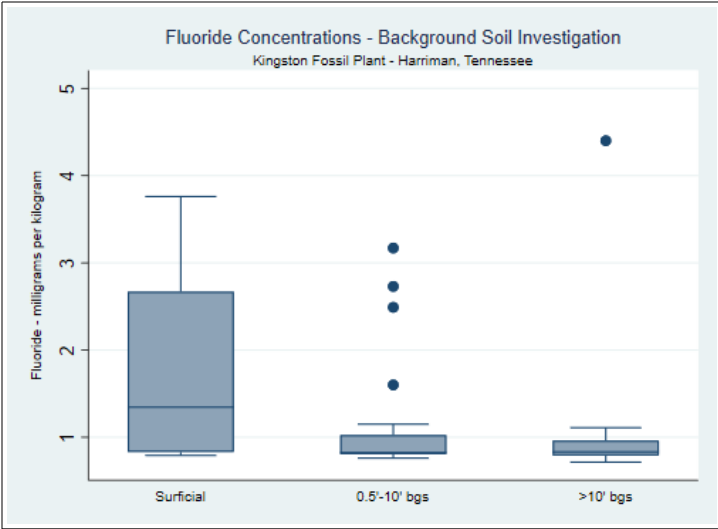
Surficial soil samples were collected in the 0 to 0.5 feet below ground surface (bgs) soil depth interval



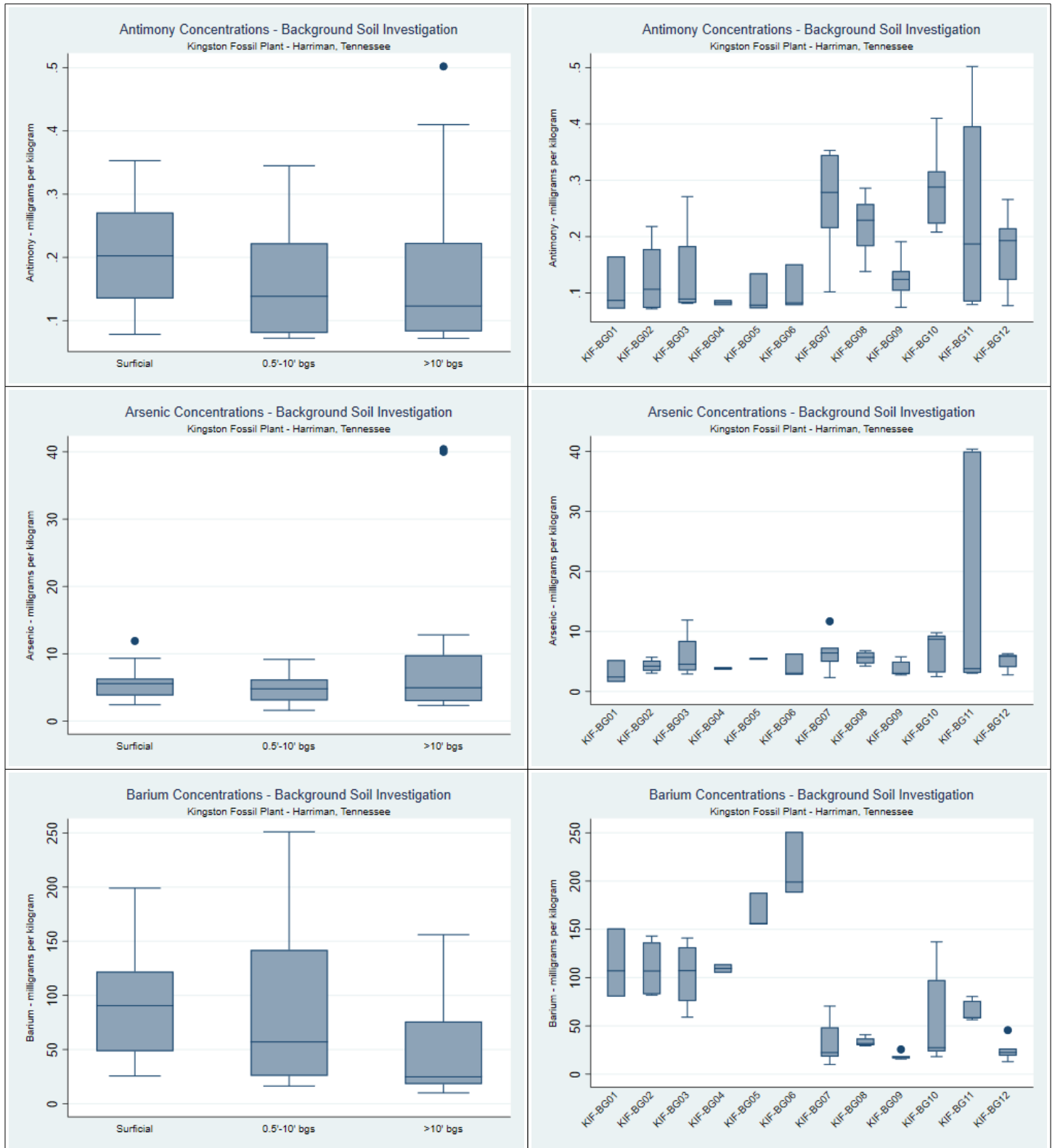
**ATTACHMENT E.1-B  
BOX PLOTS**

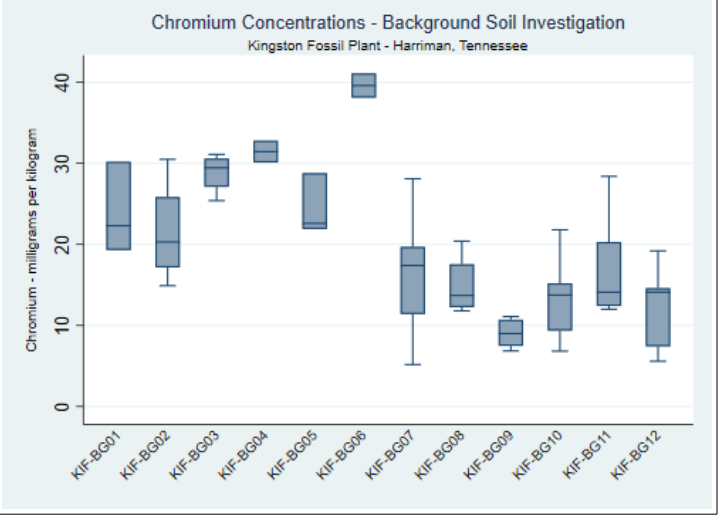
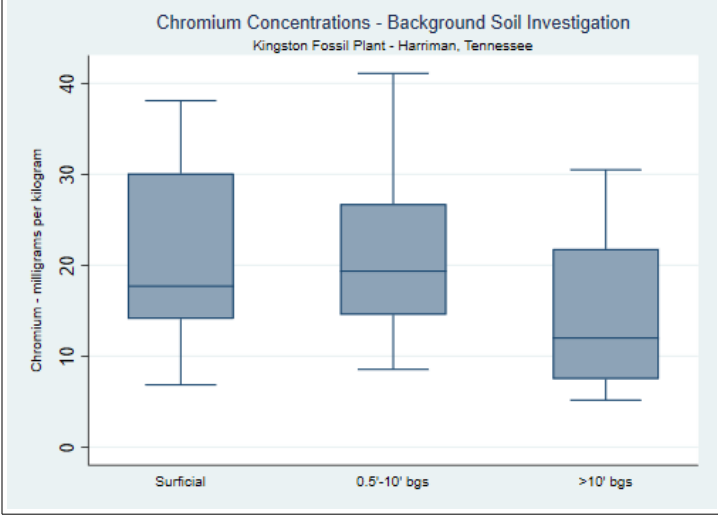
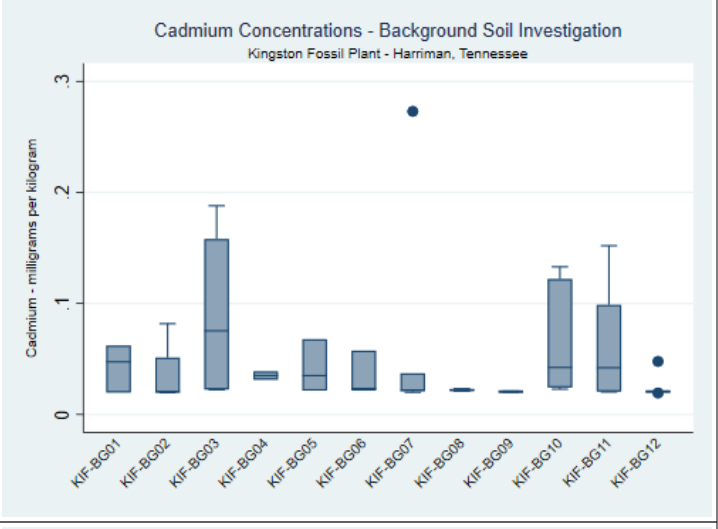
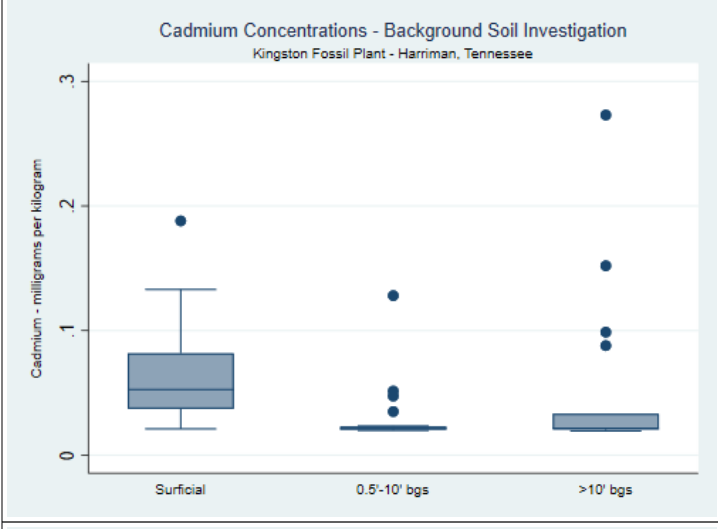
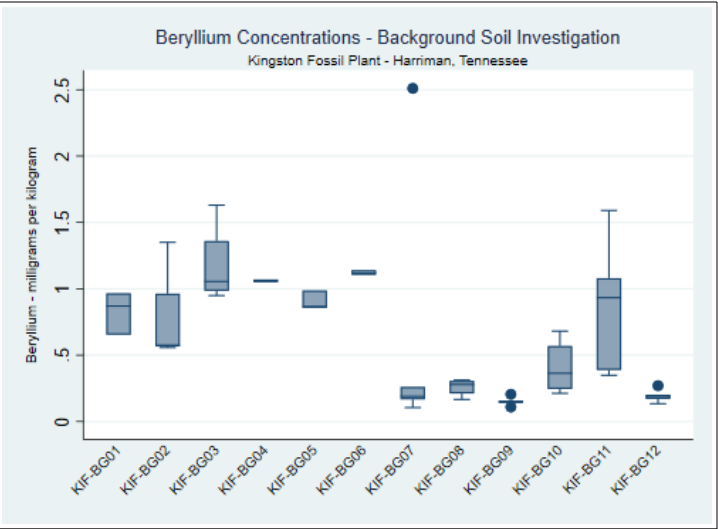
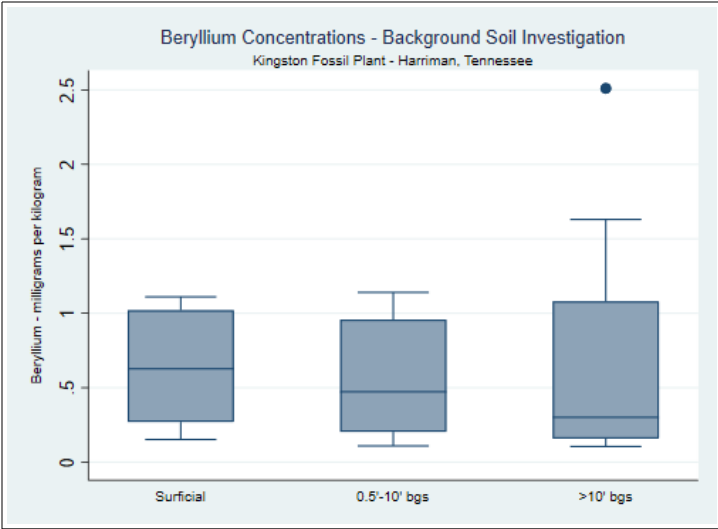
Box Plots  
 CCR Rule Appendix III Parameters  
 Background Soil Investigation  
 Kingston Fossil Plant - Harriman, Tennessee

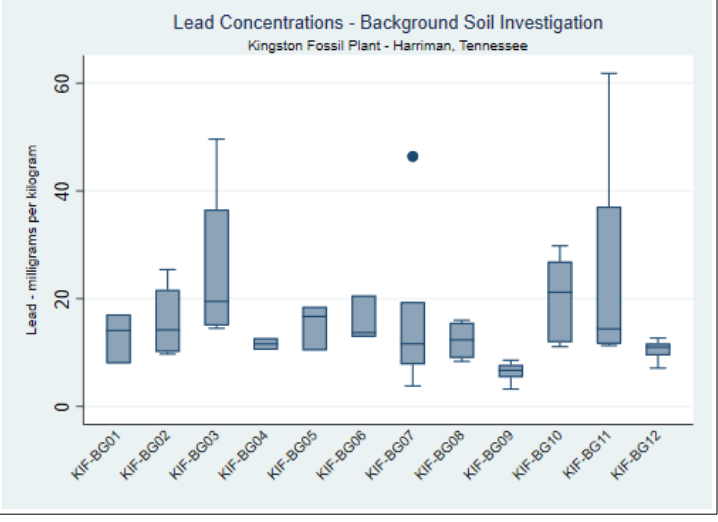
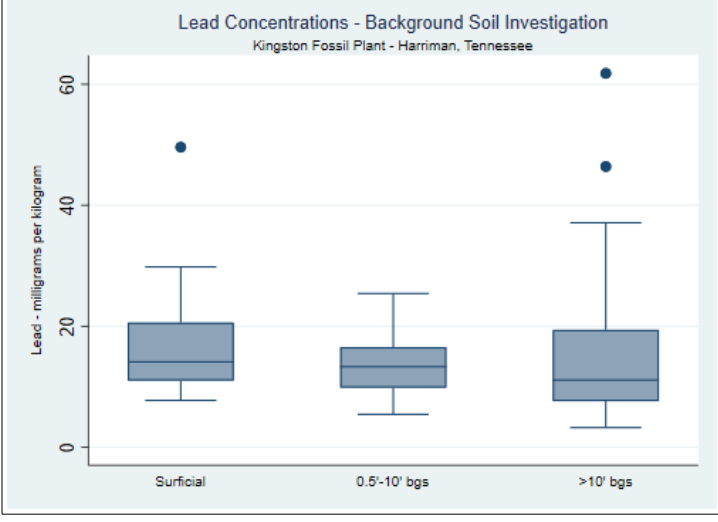
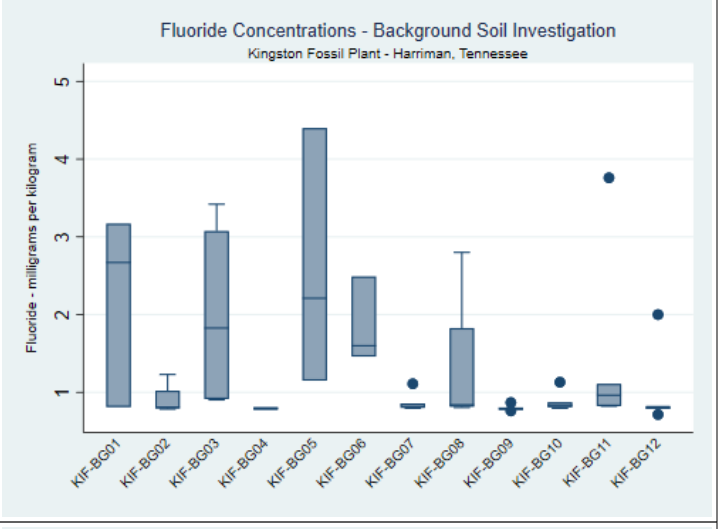
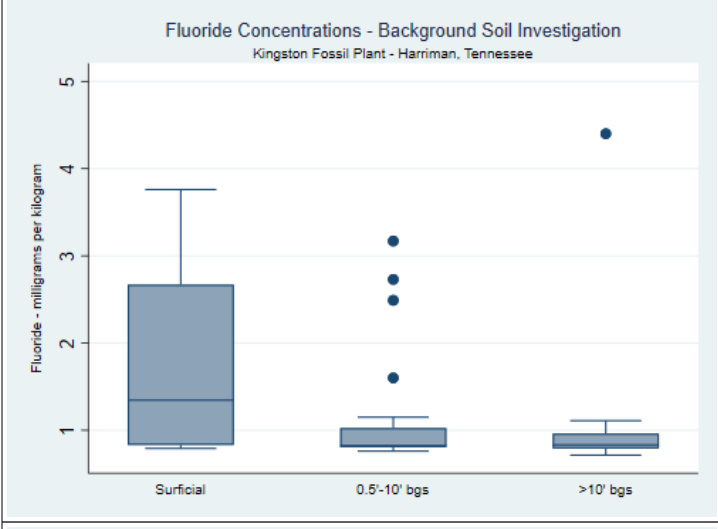
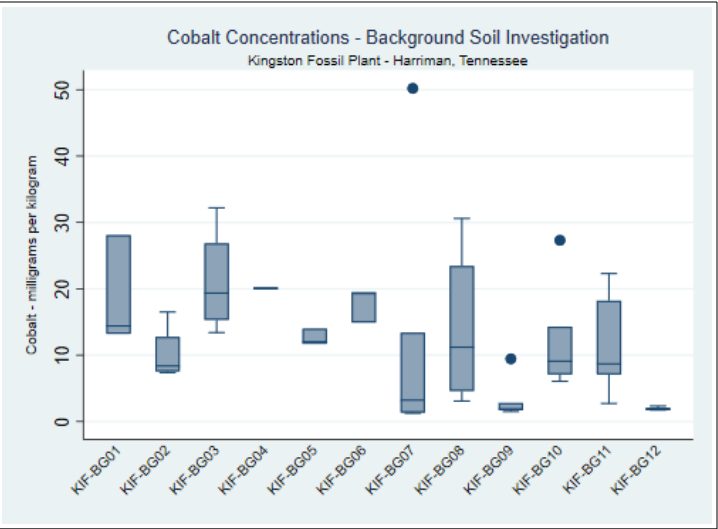
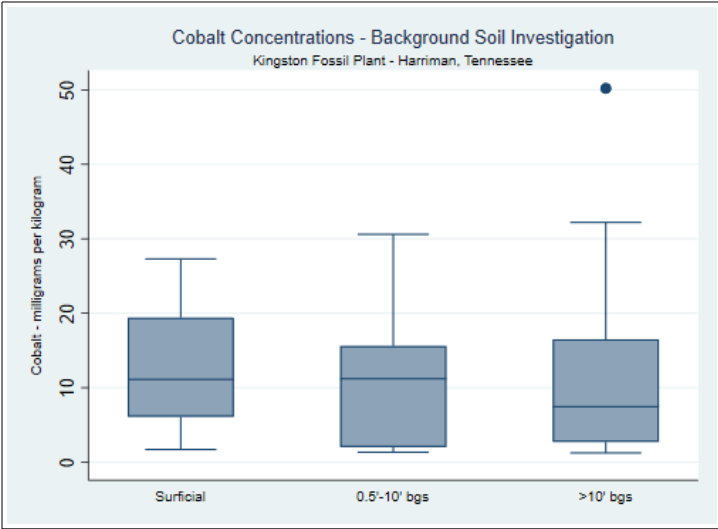


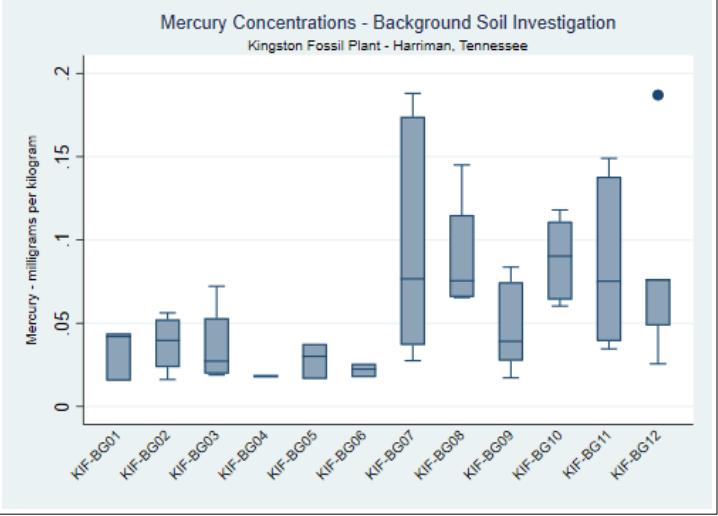
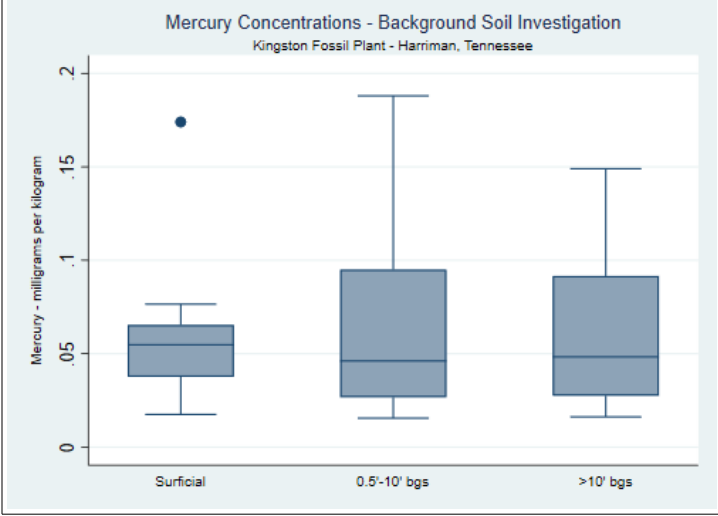
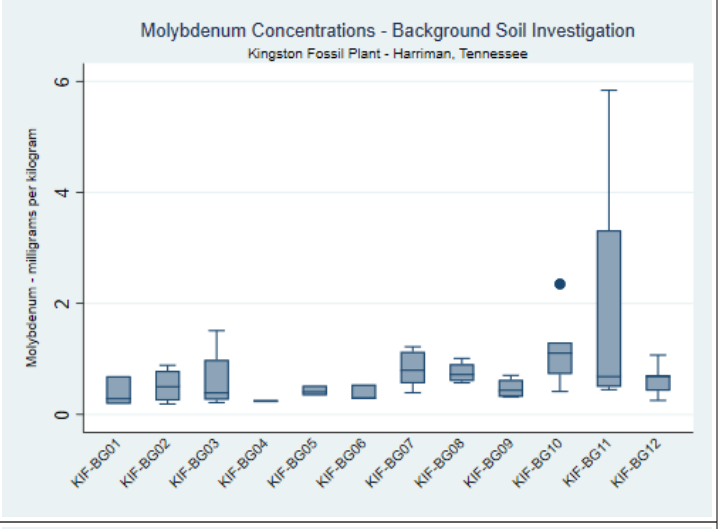
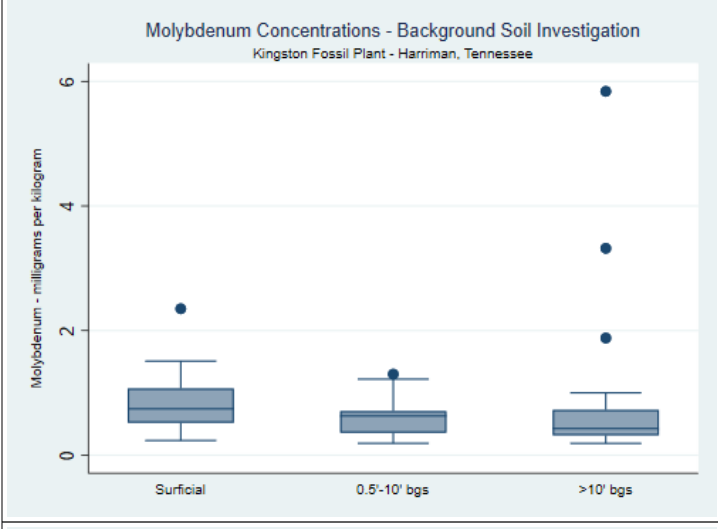
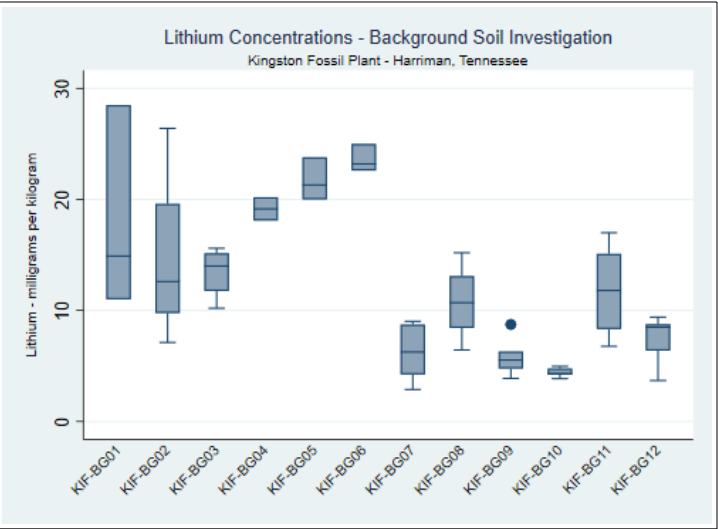
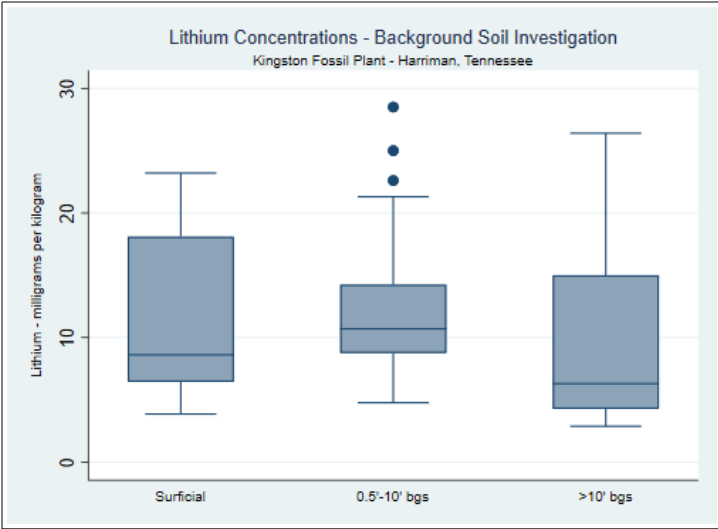


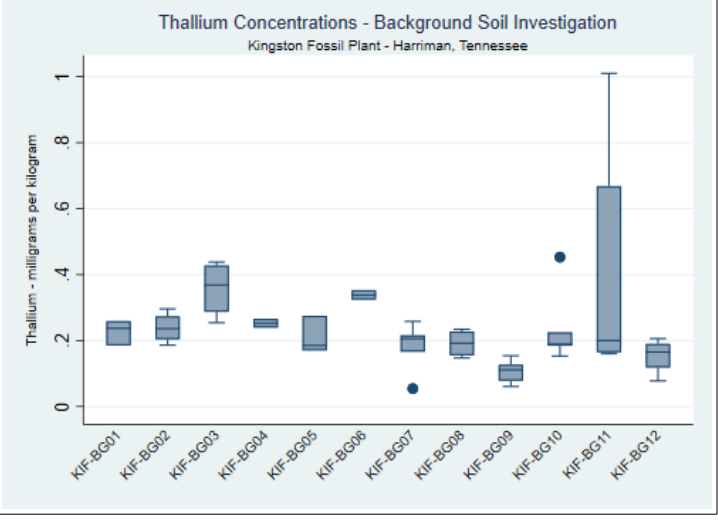
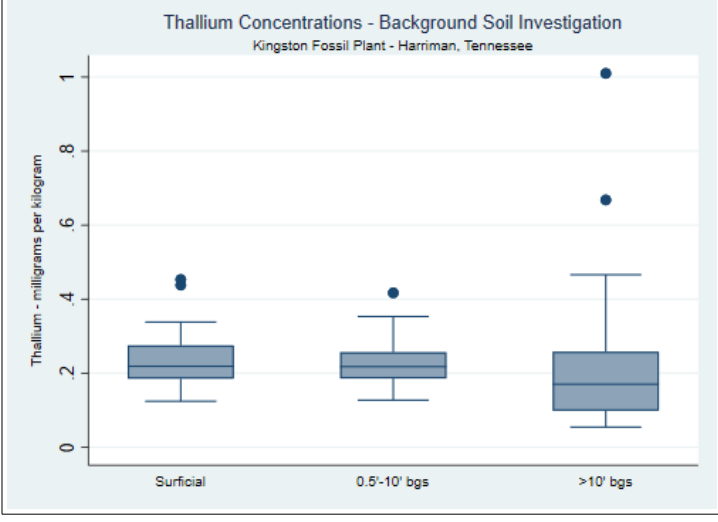
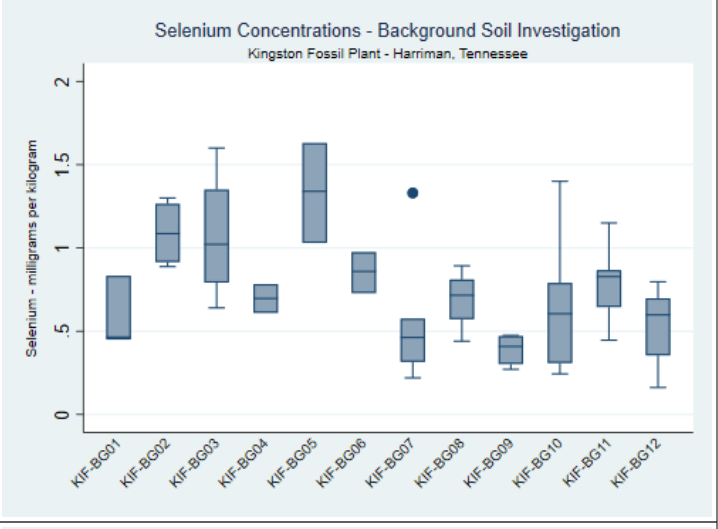
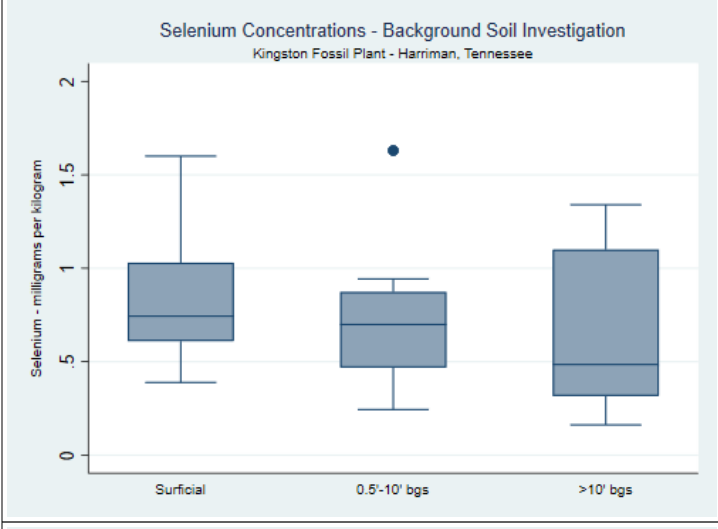
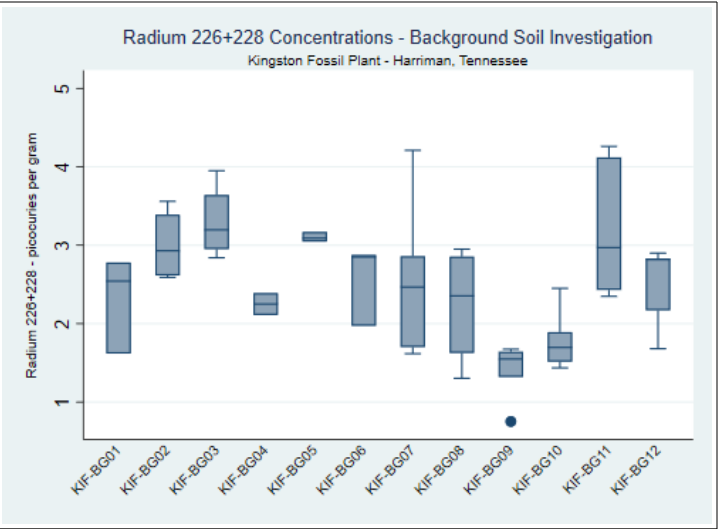
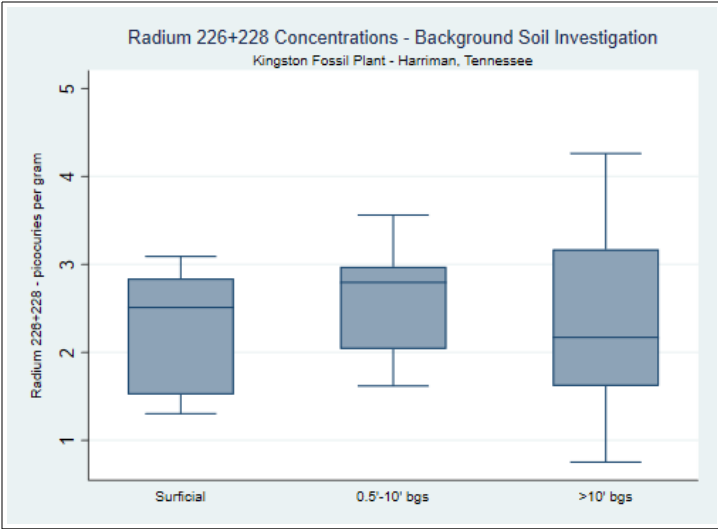
Box Plots  
 CCR Rule Appendix IV Parameters  
 Background Soil Investigation  
 Kingston Fossil Plant - Harriman, Tennessee











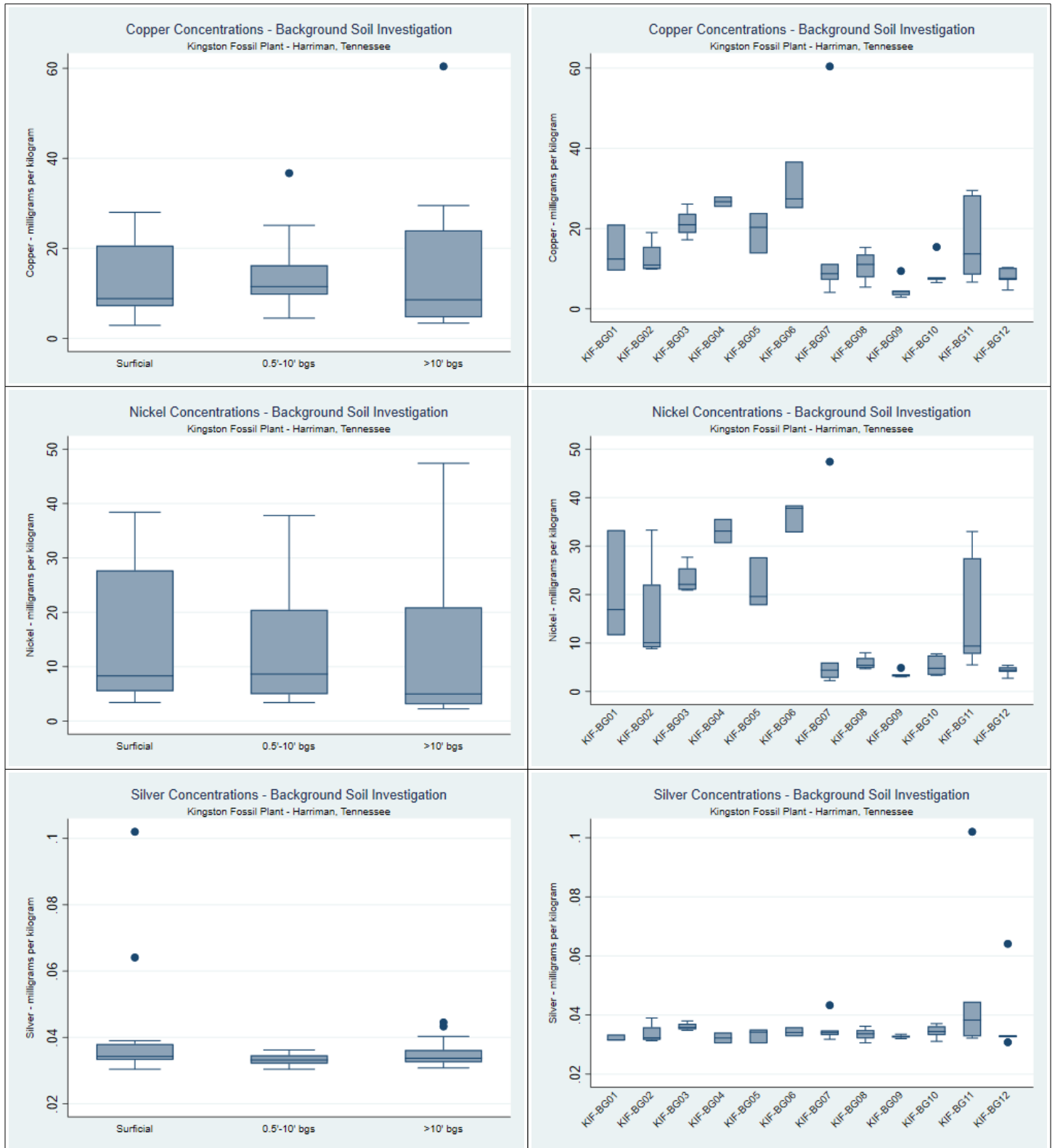


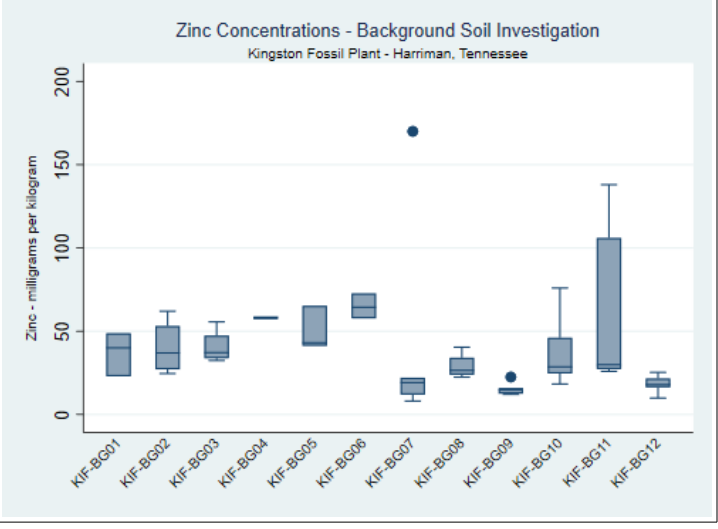
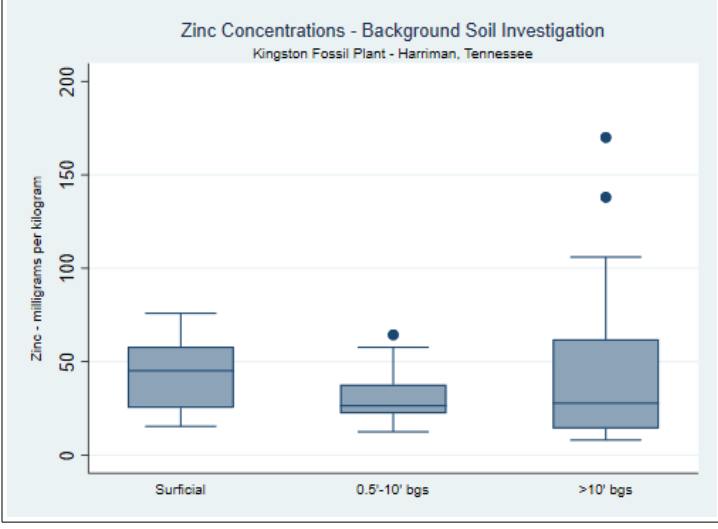
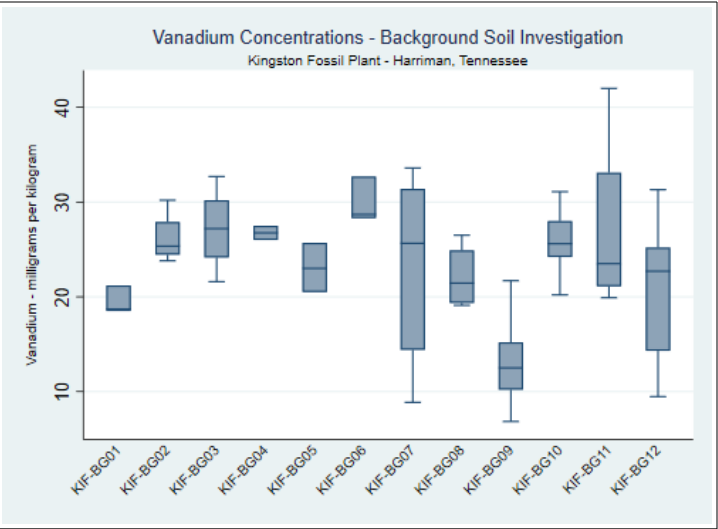
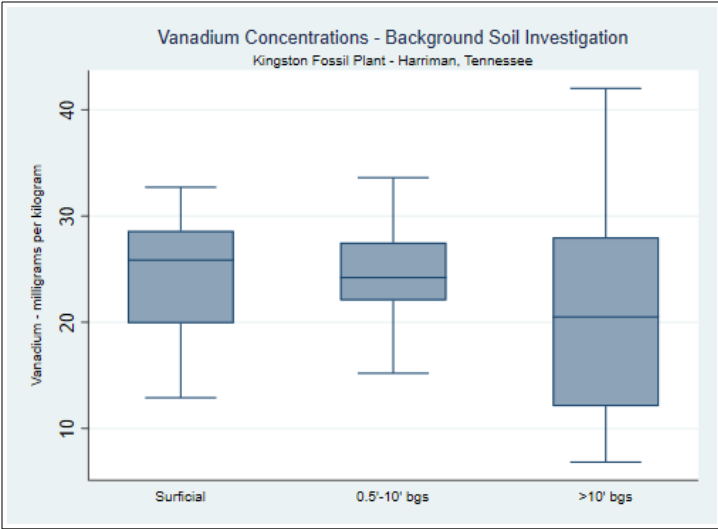
# Box Plots

## TDEC Appendix I Parameters

### Background Soil Investigation

#### Kingston Fossil Plant - Harriman, Tennessee





**APPENDIX E.2**  
**STATISTICAL ANALYSIS OF CCR MATERIAL**  
**CHARACTERISTICS DATA**



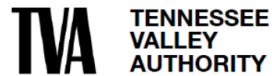
**Appendix E.2 - Statistical  
Analysis of CCR Material  
Characteristics Data**

TDEC Commissioner's Order:  
Environmental Assessment Report  
Kingston Fossil Plant  
Harriman, Tennessee

March 12, 2024

Prepared for:

Tennessee Valley Authority  
Chattanooga, Tennessee



Prepared by:

Stantec Consulting Services Inc.  
Lexington, Kentucky

## APPENDIX E.2 - STATISTICAL ANALYSIS OF CCR MATERIAL CHARACTERISTICS DATA

### REVISION LOG

<b>Revision</b>	<b>Description</b>	<b>Date</b>
0	EAR Submittal to TDEC	May 30, 2023
1	Addresses August 16, 2023 TDEC Review Comments and Issued for TDEC	November 14, 2023
2	Addresses January 12, 2024 TDEC Review Comments and Issued for TDEC	March 12, 2024



## Sign-off Sheet

This document entitled Appendix E.2 - Statistical Analysis of CCR Material Characteristics Data was prepared by Stantec Consulting Services Inc. ("Stantec") for the account of Tennessee Valley Authority (the "Client"). Any reliance on this document by any third party is strictly prohibited. The material in it reflects Stantec's professional judgment in light of the scope, schedule and other limitations stated in the document and in the contract between Stantec and the Client. The opinions in the document are based on conditions and information existing at the time the document was published and do not consider any subsequent changes. In preparing the document, Stantec did not verify information supplied to it by others. Any use which a third party makes of this document is the responsibility of such third party. Such third party agrees that Stantec shall not be responsible for costs or damages of any kind, if any, suffered by it or any other third party as a result of decisions made or actions taken based on this document.

Prepared by 

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Reviewed by 

**Melissa Whitfield Aslund, PhD, Environmental Scientist**

Approved by 

**Rebekah Brooks, PG, Senior Principal Hydrogeologist**



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Attachment E.2-D	Scatter Plots and Regression



## Abbreviations

CASRN	Chemical Abstracts Service Registry Number
CCR	Coal Combustion Residuals
CCR Parameters	Constituents listed in Appendices III and IV of 40 CFR 257 and five inorganic constituents included in Appendix I of Tennessee Rule 0400-11-01-.04
CCR Rule	Title 40, Code of Federal Regulations, Part 257
EAR	Environmental Assessment Report
IQR	Interquartile Range
KIF Plant	Kingston Fossil Plant
NA	Not Available
NTUs	Nephelometric Turbidity Units
%	Percent
SPLP	Synthetic Precipitate Leaching Procedure
Stantec	Stantec Consulting Services Inc.
TDEC	Tennessee Department of Environment and Conservation
TVA	Tennessee Valley Authority





## APPENDIX E.2 - STATISTICAL ANALYSIS OF CCR MATERIAL CHARACTERISTICS DATA

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### 1.0 INTRODUCTION

Stantec Consulting Services Inc. (Stantec) prepared this appendix on behalf of the Tennessee Valley Authority (TVA) to document the statistical analyses performed on data collected to characterize coal combustion residual (CCR) material in support of evaluations conducted for the Environmental Assessment Report (EAR) at the Kingston Fossil Plant (KIF Plant) located in Harriman, Tennessee. The CCR material characterization samples were collected between November 2018 and December 2019 within the TDEC Order CCR management units<sup>1</sup> at the KIF Plant, which include the Interim Ash Staging Area, Sluice Trench and Area East of Sluice Trench, and Stilling Pond . Further details regarding the CCR material sampling and laboratory data are presented in the KIF Plant *CCR Material Characteristics Sampling and Analysis Report* (Appendix J.2). Additional samples collected in November 2017 from the Stilling Pond were incorporated into this evaluation.

For the Environmental Investigation, CCR material and pore water samples were collected for characterization related to the leachability of constituents listed in Appendices III and IV of 40 CFR 257 and five additional inorganic constituents included in Appendix I of Tennessee Rule 0400-11-01-.04 (CCR Parameters) from material within two KIF Plant TDEC Order CCR management units: the Interim Ash Staging Area and Sluice Trench and Area East of Sluice Trench. Additional samples collected in November 2017 from locations in the Stilling Pond were included into this evaluation. The Synthetic Precipitate Leaching Procedure (SPLP) was used to characterize leachability of CCR Parameters in CCR material. Temporary well/boring locations and the number of samples collected in each KIF Plant TDEC Order CCR management unit are presented in Table E.2-1. Table E.2-2 presents the list of CCR parameters evaluated in this statistical evaluation.

**Table E.2-1 – CCR Material Characteristics Sample Locations - KIF Plant**

KIF Plant TDEC Order CCR Management Unit	Temporary Well/Boring Location	Number of Samples	
		CCR Material/SPLP	Pore Water
Interim Ash Staging Area	KIF-TW01; KIF-TW02; KIF-TW03; KIF-B01; KIF-B02; KIF-B03	33	3
Sluice Trench and Area East of Sluice Trench	KIF-TW04; KIF-TW05; KIF-B04	17	2
Stilling Pond	GP-17-101; GP-17-102; GP-17-103	3	3

<sup>1</sup> The term “CCR management unit” is used in this document generally and is not intended to be a designation under federal or state regulations.



## APPENDIX E.2 - STATISTICAL ANALYSIS OF CCR MATERIAL CHARACTERISTICS DATA

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Table E.2-2 – CCR Parameters Evaluated in Statistical Analysis

CCR Parameter	CASRN
<b>CCR Rule Appendix III Parameters</b>	
Boron	7440-42-8
Calcium	7440-70-2
Chloride	16887-00-6
Fluoride <sup>1</sup> (also Appendix IV)	16984-48-8
pH	NA
Sulfate	14808-79-8
Total Dissolved Solids	NA
<b>CCR Rule Appendix IV Parameters</b>	
Antimony	7440-36-0
Arsenic	7440-38-2
Barium	7440-39-3
Beryllium	7440-41-7
Cadmium	7440-43-9
Chromium	7440-47-3
Cobalt	7440-48-4
Lead	7439-92-1
Lithium	7439-93-2
Mercury	7439-97-6
Molybdenum	7439-98-7
Radium-226+228	13982-63-3 / 15262-20-1
Selenium	7782-49-2
Thallium	7440-28-0
<b>Additional TDEC Appendix I Parameters</b>	
Copper	7440-50-8
Nickel	7440-02-0
Silver	7440-22-4
Vanadium	7440-62-2
Zinc	7440-66-6
<b>Other</b>	
Iron	7439-89-6
Manganese	7439-96-5
Total Organic Carbon	NA

**Notes:** CASRN: Chemical Abstracts Service Registry Number; CCR Rule - Title 40, Code of Federal Regulations, Part 257; NA – Not Available; TDEC - Tennessee Department of Environment and Conservation

<sup>1</sup>Fluoride is both a CCR Rule Appendix III and CCR Rule Appendix IV CCR parameter. In this table, and in the results figures and tables for this report, fluoride has been grouped with the Appendix III CCR parameters only to avoid duplication.

The following sections present the methods and results used to evaluate the CCR material and pore water data, including: 1) general exploratory data analysis (summary statistics, data plots and outlier screening), 2) a regression analysis to evaluate correlation between SPLP results to CCR Parameter concentrations in CCR material, and 3) a comparison of SPLP results to pore water concentrations.

## 2.0 METHODS

The statistical evaluation was conducted in three parts: 1) exploratory data analysis, 2) regression analysis, and 3) comparison of SPLP results to CCR Parameter concentrations in pore water.



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## 2.1 EXPLORATORY DATA ANALYSIS

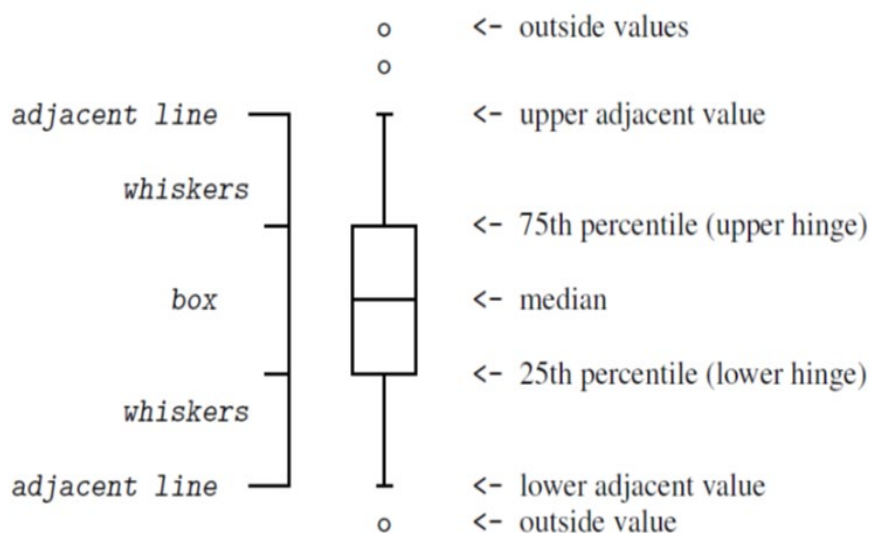
Exploratory data analysis is the initial step of statistical analysis. It utilizes simple summary statistics (e.g. mean, median, standard deviation and percentiles) and graphical representations to identify characteristics of an analytical dataset, such as the center of the data (mean, median), variation, distribution, patterns, presence of outliers, and randomness.

### 2.1.1 Summary Statistics

Summary statistics were calculated for CCR material, SPLP, and pore water for each CCR Parameter grouped by KIF Plant TDEC Order CCR management unit. Summary statistics include information such as the total numbers of available samples, the frequencies of detection, ranges of reporting limits, minimum and maximum detected concentrations, mean concentrations, standard deviations, median concentrations, and the 95<sup>th</sup> percentile concentrations. Summary statistics were calculated for total metal and dissolved metal concentrations in pore water. Summary statistics tables are presented in Attachment E.2-A.

### 2.1.2 Exploratory Data Plots

Box plots were constructed of CCR Parameter concentrations in CCR material to support a visual review of the data. Box plots were used to identify the center of the data, distribution, variability, and to visually identify potential outliers. The diagram below graphically depicts the basics of the construction of the box plots (StataCorp LLC 2017).



The box portion of the plot is the interquartile range (IQR), which represents the middle 50 percent (%) of data, with the bottom of the box being the 25<sup>th</sup> percentile and the top of the box being the 75<sup>th</sup> percentile. The line inside the box is the median concentration. The top of the upper “whisker” represents the first observed concentration above the 75<sup>th</sup> percentile, whereas the bottom of the lower “whisker” represents the first observed concentration below the 25<sup>th</sup> percentile (upper adjacent value and lower adjacent value,



## APPENDIX E.2 - STATISTICAL ANALYSIS OF CCR MATERIAL CHARACTERISTICS DATA

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respectively). Values that lie outside of the adjacent values represent outside (potential outliers) concentrations (i.e. concentrations at the upper and lower ends of the distribution of the data). The method detection limit was used as the reported value in order to construct the box plot when analytical results were reported as non-detects.

Side-by-side box plots were constructed for the CCR material and pore water data and aggregated by temporary well/boring location and KIF Plant TDEC Order CCR management unit. These box plots were useful in identifying differences in CCR Parameter concentrations between each KIF Plant TDEC Order CCR management unit and are especially useful for visually identifying potential outliers. Box plots are presented in Attachment E.2-B for CCR material results and E.2-C for pore water results.

### 2.1.3 Outlier Screening

Outliers are data points that are abnormally high or low as compared to other measurements and may represent anomalous data or data errors. Outliers may also represent natural variation of CCR Parameter concentrations in environmental systems. Screening for outliers is a critical step because outliers can bias statistical estimates, statistical testing results, and inferences.

Outlier values were initially screened visually using side-by-side box plots. If suspected visual outliers were identified, then Tukey's procedure was used to identify extreme outliers (Tukey 1977). This method relies on the 25<sup>th</sup> and 75<sup>th</sup> percentiles of the data (IQR), which is defined as the 75<sup>th</sup> percentile value minus the 25<sup>th</sup> percentile value. Values were identified as potential outliers as follows:

- **Lower extreme outliers** are less than the 25<sup>th</sup> percentile minus 3 x IQR
- **Upper extreme outliers** are greater than the 75<sup>th</sup> percentile plus 3 x IQR.

Finally, when the potential outlier(s) were identified visually and by Tukey's procedure, then statistical testing for outliers (Dixon or Rosner's Test) was conducted to determine if the data points were statistically significant outliers.

Following confirmation of the outliers as statistically significant, a desktop evaluation was conducted to verify that the data points were not errors (e.g., laboratory or transcriptional error). Field forms, data validation reports, and other variables in the dataset that could influence analytical results were also evaluated. If a verifiable error was discovered, the outlier was removed and, if possible, replaced with a corrected value.

In the absence of a verifiable error, additional lines of evidence were reviewed to determine final outlier disposition (e.g., frequency of detection, spatial and temporal variability). If an outlier was identified as suitable for removal from further statistical analysis, a clear and defensible rationale based on multiple lines of evidence was provided. In addition, values that were identified as outliers and removed from further evaluation in the present statistical analysis were retained in the historical database and will be reevaluated for inclusion or exclusion in future statistical analyses of this dataset. The results of the outlier screening for the KIF Plant CCR material dataset are provided in Section 3.1.



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### 2.2 REGRESSION ANALYSIS

The linear relationship between the concentrations of CCR Parameters in SPLP results and concentrations in CCR material was evaluated using regression analysis. Scatter plots were constructed to compare SPLP and CCR material results for the CCR Parameters. Using linear regression, the Pearson's correlation coefficient was estimated, and a regression line was fit to the data and added to the scatter plots. As part of the analysis, the SPLP results for the CCR Parameters were compared to the range of pore water concentrations observed in the respective KIF Plant TDEC Order CCR management units. Analyses were conducted on data where CCR parameters were detected in greater than 50% of the samples in both the SPLP and CCR material datasets. Scatter plots, regression results, and range of pore water concentrations are presented in Attachment E.2-D.

### 3.0 RESULTS AND DISCUSSION

#### 3.1 SUMMARY STATISTICS, EXPLORATORY DATA PLOTS, AND OUTLIER SCREENING

Summary statistics tables are presented in Attachment E.2-A, and box plots are presented in Attachments E.2-B for CCR material and E.2-C for pore water.

No outliers were identified in the CCR material or SPLP datasets.

Anomalously high CCR parameter concentrations were observed in the pore water sample collected from well GP-17-102, thus the pore water dataset was subsequently screened using outlier screening methods described above for CCR Appendix IV and TDEC Appendix I parameters. Pore water box plots aggregated by KIF Plant TDEC Order CCR management unit are presented as Attachment E.2-C. Multiple CCR parameter concentrations were identified as potential statistical outliers. Turbidity measurements were also anomalously high in sample GP-17-102 (616.3 nephelometric turbidity units [NTUs]), compared to turbidity measurements across the KIF Plant TDEC Order CCR management unit areas, which ranged from 1.17 to 99 NTUs. Using the outlier screening methods described above, turbidity in sample GP-17-102 was found to be a statistically significant outlier. A box plot for turbidity is provided in Attachment E.2-C. Since turbidity was an outlier and could be the cause of other anomalously high CCR parameter concentrations observed in sample GP-17-102, sample results from GP-17-102 were excluded from further statistical analyses.

#### 3.2 REGRESSION ANALYSIS

The purpose of the regression analysis was to evaluate whether the total concentrations of metals in CCR material could be used as a reliable predictor of leachable concentrations as represented by SPLP concentrations. Scatter plots, regression results, and range of pore water concentrations are presented in Attachment E.2-D. The correlation coefficient is a numerical measure that measures the strength of association between two variables (in this case, between total concentration and SPLP results for CCR material), with values ranging from zero to one. A high correlation coefficient (closer to one) demonstrates



## APPENDIX E.2 - STATISTICAL ANALYSIS OF CCR MATERIAL CHARACTERISTICS DATA

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a strong relationship between the two variables, whereas a low correlation coefficient (closer to zero) demonstrates a weak relationship. The slope of the regression line indicates the direction of correlation. A positive slope indicates that SPLP concentrations increased as CCR Parameter concentrations in CCR material increased. Conversely, a negative slope indicates that as CCR Parameter concentrations in CCR material increased, the SPLP concentrations decreased.

The statistical relationships between SPLP concentrations and CCR material concentrations were inconsistent and highly variable. One would expect SPLP concentrations to increase with increasing CCR parameter concentrations in CCR material (e.g. regression line with a positive slope). However, this relationship was inconsistent between different CCR parameters and between KIF Plant TDEC Order CCR management units (e.g. boron). In some cases, even when there was a statistically significant correlation (e.g., vanadium), the wide range of variability around the regression line limits the predictive value of the relationship. The results indicate that the total concentrations of metals in CCR material are not a reliable predictor of the magnitude of the potentially leached concentrations measured using SPLP.

In addition, the CCR parameter concentrations in SPLP generally underestimated CCR parameter concentrations measured in pore water.

The results indicate that direct measurement of pore water concentrations is the most accurate way of characterizing potential leachability from CCR materials.

### 4.0 REFERENCES

StataCorp LLC. (2017). Stata Graphics Reference Manual Stata: Release 15. Statistical Software. College Station, Texas: StataCorp LLC.

Tukey, J.W. (1977). Exploratory Data Analysis. Reading, Massachusetts: Addison-Wesley. 1977.



**ATTACHMENT E.2-A  
SUMMARY STATISTICS**

**Summary Statistics - CCR Material Characteristics  
Kingston Fossil Plant - Harriman, Tennessee**

Parameter	CCR Management Unit	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
<b>CCR Rule Appendix III Parameters</b>										
Boron	Interim Ash Staging Area	33/33	--	0%	9.67	57.6	29.0	13.59	26.4	50.7
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	3.92	211	62.0	70.62	31.7	202.2
	Interim Ash Staging Area	3/3	--	0%	28.3	58.7	39.3	16.83	31	55.93
Calcium	Interim Ash Staging Area	33/33	--	0%	1,060	24,500	5,828	5,914	3,680	19,480
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	770	51,100	13,495	15,054	4,530	36,300
	Interim Ash Staging Area	3/3	--	0%	2,250	6,400	3,753	2,299	2,610	6,021
Chloride	Interim Ash Staging Area	23/33	(4.62-5.79)	30.3%	5.48	104	10.19	16.78	6.83	13.52
	Sluice Trench and Ballfield East of Sluice Trench	2/17	(5.07-10.2)	88.2%	6.04	9.88	5.484	1.177	6.07	9.944
	Interim Ash Staging Area	1/3	(3.79-3.86)	66.7%	4.36	4.36	3.98	0.269	3.86	4.31
Fluoride	Interim Ash Staging Area	17/33	(0.756-1.05)	48.5%	1.13	4.29	1.671	1.163	1.13	3.752
	Sluice Trench and Ballfield East of Sluice Trench	7/17	(0.848-1.37)	58.8%	1.07	2.37	1.10	0.403	1.07	1.794
	Interim Ash Staging Area	3/3	--	0.0%	1.15	6.13	3.44	2.515	3.03	5.82
pH (lab)	Interim Ash Staging Area	33/33	--	0%	4.90	8.70	7.345	0.896	7.60	8.30
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	3.90	11.0	8.165	2.166	8.20	10.92
	Interim Ash Staging Area	3/3	--	0%	7.80	8.0	7.9	0.1	7.90	7.99
Sulfate	Interim Ash Staging Area	33/33	--	0%	111	16,400	1,157	2,788	531	2,252
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	49.7	1,460	434	434	258	1,196
	Interim Ash Staging Area	3/3	--	0%	31.9	94	65	31	70	91
<b>CCR Rule Appendix IV Parameters</b>										
Antimony	Interim Ash Staging Area	33/33	--	0%	0.292	1.15	0.659	0.281	0.623	1.108
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	0.225	2.01	0.808	0.616	0.538	1.866
	Stilling Pond	3/3	--	0%	0.432	0.926	0.761	0.285	0.924	0.926
Arsenic	Interim Ash Staging Area	33/33	--	0%	18.1	119	49.12	24.09	43.6	92.6
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	15.9	115	38.82	24.0	33.5	77.64
	Stilling Pond	3/3	--	0%	32.6	80.8	60.5	25.0	68.1	79.53
Barium	Interim Ash Staging Area	33/33	--	0%	105	428	248	95.56	243	410.2
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	79.7	1520	475.6	515	218	1448
	Stilling Pond	3/3	--	0%	137	225	185	44.54	193	221.8
Beryllium	Interim Ash Staging Area	33/33	--	0%	0.596	3.86	1.673	0.822	1.50	3.116
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	0.321	5.49	2.249	1.823	1.54	5.434
	Stilling Pond	3/3	--	0%	1.28	2.44	1.853	0.58	1.84	2.38
Cadmium	Interim Ash Staging Area	33/33	--	0%	0.0664	0.879	0.262	0.179	0.230	0.554
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	0.0520	0.594	0.233	0.204	0.153	0.580
	Stilling Pond	3/3	--	0%	0.2460	0.571	0.413	0.163	0.423	0.556



**Summary Statistics - CCR Material Characteristics  
Kingston Fossil Plant - Harriman, Tennessee**

Parameter	CCR Management Unit	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
Chromium	Interim Ash Staging Area	33/33	--	0%	8.78	35.3	21.29	7.778	19.3	34.0
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	8.73	41.0	23.63	11.0	22.7	38.84
	Stilling Pond	3/3	--	0%	13.5	20.3	17.87	3.8	19.8	20.25
Cobalt	Interim Ash Staging Area	33/33	--	0%	3.88	35.6	9.018	5.819	7.48	14.9
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	3.15	22.1	10.88	6.257	8.76	21.22
	Stilling Pond	3/3	--	0%	4.42	7.97	6.097	1.783	5.9	7.763
Fluoride	Interim Ash Staging Area	17/33	(0.756-1.05)	48.5%	1.13	4.29	1.671	1.163	1.13	3.752
	Sluice Trench and Ballfield East of Sluice Trench	7/17	(0.848-1.37)	58.8%	1.07	2.37	1.10	0.403	1.07	1.794
	Stilling Pond	3/3	--	0.0%	1.15	6.13	3.44	2.515	3.03	5.82
Lead	Interim Ash Staging Area	33/33	--	0%	2.83	27.4	11.77	6.993	9.62	24.3
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	2.82	27.4	11.79	8.949	8.12	26.6
	Stilling Pond	3/3	--	0%	11.6	19.9	16.37	4.285	17.6	19.67
Lithium	Interim Ash Staging Area	33/33	--	0%	10.2	38.8	20.0	8.60	17.7	36.0
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	5.75	23.1	14.56	5.831	13.1	22.94
	Stilling Pond	3/3	--	0%	15.4	25.2	20.1	4.912	19.7	24.65
Mercury	Interim Ash Staging Area	31/33	(0.0148-0.0305)	6.06%	0.0307	1.22	0.125	0.212	0.0786	0.305
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	0.0351	0.611	0.166	0.153	0.120	0.489
	Stilling Pond	3/3	--	0%	0.0451	0.101	0.0682	0.0292	0.058	0.0967
Molybdenum	Interim Ash Staging Area	33/33	--	0%	1.82	9.31	3.538	1.891	2.91	8.078
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	0.990	6.84	4.20	1.894	3.74	6.688
	Stilling Pond	3/3	--	0%	1.880	16	8.05	7.228	6.26	15.03
Radium-226+228	Interim Ash Staging Area	33/33	--	0%	2.95	8.52	6.38	1.37	6.62	8.18
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	2.87	7.61	5.55	1.41	5.57	7.49
	Stilling Pond	3/3	--	0%	6.57	7.78	7.113	0.61	6.99	7.701
Selenium	Interim Ash Staging Area	33/33	--	0%	1.00	8.88	2.967	1.764	2.51	6.434
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	1.32	13.5	4.046	2.917	3.45	7.60
	Stilling Pond	3/3	--	0%	1.91	4.21	3.367	1.267	3.98	4.19
Thallium	Interim Ash Staging Area	33/33	--	0%	0.395	7.31	1.208	1.172	1.03	1.838
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	0.353	1.75	1.027	0.368	1.05	1.694
	Stilling Pond	3/3	--	0%	1.05	1.51	1.24	0.24	1.16	1.475

Summary Statistics - CCR Material Characteristics Kingston Fossil Plant - Harriman, Tennessee										
Parameter	CCR Management Unit	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
<b>TDEC Appendix I Parameters</b>										
Copper	Interim Ash Staging Area	33/33	--	0%	13.4	47.7	28.27	9.73	26.1	42.44
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	12.3	79.3	35.41	24.23	25.2	77.3
	Stilling Pond	3/3	--	0%	19.3	36.9	28.2	8.802	28.4	36.05
Nickel	Interim Ash Staging Area	33/33	--	0%	10.3	37.5	20.67	7.285	18.5	32.8
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	10.2	40.0	22.93	10.38	20.0	39.28
	Stilling Pond	3/3	--	0%	11.1	18.3	14.87	3.612	15.2	17.99
Silver	Interim Ash Staging Area	25/33	(0.0324-0.0424)	24.2%	0.0235	0.116	0.0559	0.0277	0.0443	0.107
	Sluice Trench and Ballfield East of Sluice Trench	9/17	(0.0376-0.333)	47.1%	0.0202	0.355	0.0737	0.0955	0.122	0.337
	Stilling Pond	3/3	--	0.0%	0.0447	0.0663	0.0591	0.0124	0.0662	0.0663
Vanadium	Interim Ash Staging Area	33/33	--	0%	15.5	76.7	42.23	17.28	38.0	73.32
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	11.1	121	54.25	38.58	38.3	119.4
	Stilling Pond	3/3	--	0%	25.1	46.1	37.07	10.8	40	45.49
Zinc	Interim Ash Staging Area	33/33	--	0%	10.8	43.2	25.56	10.86	23.1	41.74
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	5.43	61.5	27.69	18.32	23.0	58.14
	Stilling Pond	3/3	--	0%	18.1	37	27.33	9.457	26.9	35.99
<b>Additional Parameters</b>										
Iron	Interim Ash Staging Area	33/33	--	0%	9,950	110,000	34,959	21,896	30,700	68,240
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	8,810	107,000	38,042	25,389	38,800	74,280
	Stilling Pond	3/3	--	0%	10,400	14,000	11,967	1,845	11,500	13,750
Manganese	Interim Ash Staging Area	33/33	--	0%	37.9	242	85.76	44.6	73.6	164.2
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	26.1	216	97.88	52.66	88.2	188
	Stilling Pond	3/3	--	0%	39.9	153	81.43	62.24	51.4	142.8
TOC	Interim Ash Staging Area	33/33	--	0%	6,810	45,600	23,231	10,529	22,500	41,880
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	11,400	93,900	36,900	22,927	31,800	81,900
	Stilling Pond	3/3	--	0%	17,900	19,800	19,133	1,069	19,700	19,790

**Notes:**

CCR Rule - Title 40, Code of Federal Regulations, Part 257

TDEC - Tennessee Department of Environment and Conservation

% - percent

"--" - Not Applicable

TOC - Total Organic Carbon

Except for pH & Radium 226 + 228, all units are milligrams per kilogram (mg/kg).

Units for pH are Standard Units (S.U.).

Units for Radium 226+228 are picocuries per gram (pCi/g).

All non-detects reported at the method detection limit.

For Parameters with non-detects reported at the method detection limit, the mean and standard deviation were calculated using Kaplan-Meier methods (KM)

**Summary Statistics - CCR Material Characteristics - Synthetic Precipitate Leaching Procedure (SPLP)**  
**Kingston Fossil Plant - Harriman, Tennessee**

Parameter	CCR Management Unit	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
<b>CCR Rule Appendix III Parameters</b>										
Boron	Interim Ash Staging Area	30/33	(62.5 - 76.6)	9.09%	45.1	1,020	422.3	393.1	160	987.8
	Sluice Trench and Ballfield East of Sluice Trench	12/17	(38.6 - 291)	29.4%	40.0	1,180	305.7	419.5	111	1,156
	Stilling Pond	3/3	--	0.0%	360.0	598	474.7	119.2	466	585
Calcium	Interim Ash Staging Area	33/33	--	0%	4,580	385,000	26,818	64,925	13,400	37,340
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	3,570	42,000	20,640	13,646	17,100	38,880
	Stilling Pond	3/3	--	0%	8,000	21,700	13,500	7,238	10,800	20,610
<b>CCR Rule Appendix IV Parameters</b>										
Antimony	Interim Ash Staging Area	24/33	(0.378 - 1.12)	27.3%	0.460	6.19	1.246	1.391	0.847	4.376
	Sluice Trench and Ballfield East of Sluice Trench	7/17	(0.879 - 1.75)	58.8%	1.18	5.67	1.627	1.235	1.35	3.502
	Stilling Pond	3/3	--	0.0%	4.56	12.6	7.5	4.434	5.34	11.87
Arsenic	Interim Ash Staging Area	33/33	--	0%	0.917	143	26.0	33.0	15.3	93.3
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	0.351	40.7	12.72	11.53	6.53	34.06
	Stilling Pond	3/3	--	0%	90.4	190	124.8	56.52	93.9	180.4
Barium	Interim Ash Staging Area	33/33	--	0%	10.4	199	72.47	39.38	73.5	129.8
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	6.55	377	105.8	102.1	87.5	283.4
	Stilling Pond	3/3	--	0%	160	327	222.7	90.96	181	312.4
Beryllium	Interim Ash Staging Area	4/33	(0.057 - 0.182)	87.9%	0.202	0.433	0.0864	0.0857	0.155	0.268
	Sluice Trench and Ballfield East of Sluice Trench	5/17	(0.057 - 0.155)	70.6%	0.0600	3.31	0.346	0.808	0.155	1.806
	Stilling Pond	0/3	(0.131 - 0.131)	100.0%	--	--	--	--	0.131	0.131
Cadmium	Interim Ash Staging Area	4/33	(0.125 - 0.125)	87.9%	0.133	0.396	0.145	0.0646	0.125	0.295
	Sluice Trench and Ballfield East of Sluice Trench	3/17	(0.125 - 0.125)	82.4%	0.192	1.88	0.288	0.456	0.125	1.232
	Stilling Pond	2/3	(0.0781 - 0.0781)	33.3%	0.086	0.089	0.0844	0.0046	0.086	0.0887
Chromium	Interim Ash Staging Area	10/33	(0.631 - 1.53)	69.7%	0.804	6.88	1.20	1.159	1.53	2.684
	Sluice Trench and Ballfield East of Sluice Trench	15/17	(1.53 - 1.53)	11.8%	1.06	22.7	4.344	5.60	1.95	14.14
	Stilling Pond	0/3	(1.17 - 2.9)	100.0%	--	--	--	--	2.46	2.856
Cobalt	Interim Ash Staging Area	17/33	(0.075 - 0.075)	48.5%	0.091	12.2	1.20	2.465	0.091	5.79
	Sluice Trench and Ballfield East of Sluice Trench	5/17	(0.075 - 0.245)	70.6%	0.100	54.5	4.854	13.15	0.100	24.66
	Stilling Pond	3/3	--	0.0%	0.116	0.513	0.284	0.205	0.223	0.484
Lead	Interim Ash Staging Area	9/33	(0.094 - 0.128)	72.7%	0.130	1.09	0.157	0.183	0.128	0.406
	Sluice Trench and Ballfield East of Sluice Trench	3/17	(0.094 - 0.516)	82.4%	0.161	6.62	0.54	1.537	0.128	2.172
	Stilling Pond	2/3	(0.318 - 0.318)	33.3%	0.964	1.17	0.817	0.363	0.964	1.149
Lithium	Interim Ash Staging Area	29/33	(2.56 - 3.14)	12.1%	3.15	19.9	9.565	5.044	9.22	17.0
	Sluice Trench and Ballfield East of Sluice Trench	15/17	(2.56 - 3.14)	11.8%	3.13	30.7	7.057	6.725	4.54	16.94
	Stilling Pond	3/3	--	0.0%	4.95	7.7	6.083	1.437	5.6	7.49

**Summary Statistics - CCR Material Characteristics - Synthetic Precipitate Leaching Procedure (SPLP)  
Kingston Fossil Plant - Harriman, Tennessee**

Parameter	CCR Management Unit	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
Mercury	Interim Ash Staging Area	1/33	(0.101 - 0.101)	97.0%	0.114	0.114	0.101	0.00223	0.101	0.101
	Sluice Trench and Ballfield East of Sluice Trench	0/17	(0.1 - 0.101)	100%	--	--	--	--	0.101	0.101
	Stilling Pond	0/3	(0.0653 - 0.0653)	100%	--	--	--	--	0.0653	0.0653
Molybdenum	Interim Ash Staging Area	30/33	(0.61 - 0.61)	9.09%	0.759	203	26.69	44.19	9.97	134.2
	Sluice Trench and Ballfield East of Sluice Trench	11/17	(0.474 - 3.81)	35.3%	1.34	49.2	10.79	12.7	6.11	29.36
	Stilling Pond	3/3	--	0.0%	25.3	88	60.87	32.19	69.3	86.13
Radium-226+228	Interim Ash Staging Area	11/33	(0.0233 - 0.59)	66.7%	0.0645	0.594	0.128	0.151	0.207	0.534
	Sluice Trench and Ballfield East of Sluice Trench	9/17	(0 - 0.338)	47.1%	0.245	1.062	0.348	0.354	0.338	0.824
	Stilling Pond	0/0	--	--	--	--	--	--	--	--
Selenium	Interim Ash Staging Area	26/33	(2.62 - 2.62)	21.2%	1.28	10.6	5.092	3.049	3.97	10.3
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	1.04	42.3	11.0	12.14	6.71	36.46
	Stilling Pond	3/3	--	0%	13	32.2	21.4	9.835	18.9	30.87
Thallium	Interim Ash Staging Area	15/33	(0.063 - 0.148)	54.6%	0.152	1.23	0.221	0.259	0.148	0.751
	Sluice Trench and Ballfield East of Sluice Trench	4/17	(0.063 - 0.148)	76.5%	0.174	4.45	0.527	1.20	0.128	3.30
	Stilling Pond	1/3	(0.0531 - 0.0531)	66.7%	0.09	0.09	0.0654	0.02	0.0531	0.09
<b>TDEC Appendix I Parameters</b>										
Copper	Interim Ash Staging Area	14/33	(0.627 - 1.3)	57.6%	0.685	9.03	1.60	2.02	0.962	6.658
	Sluice Trench and Ballfield East of Sluice Trench	7/17	(0.627 - 9.17)	58.8%	5.97	21.7	6.491	7.545	5.99	19.86
	Stilling Pond	2/3	(1.04 - 1.04)	33.3%	2.61	2.69	2.113	0.76	2.61	2.682
Nickel	Interim Ash Staging Area	16/33	(0.312 - 1.32)	51.5%	0.382	23.3	2.863	4.707	1.02	10.3
	Sluice Trench and Ballfield East of Sluice Trench	12/17	(0.312 - 0.573)	29.4%	0.467	111	11.52	27.63	0.866	62.76
	Stilling Pond	3/3	--	0.0%	0.643	2.35	1.311	0.912	0.941	2.209
Silver	Interim Ash Staging Area	4/33	(0.121 - 0.177)	87.9%	0.128	0.215	0.127	0.0193	0.121	0.177
	Sluice Trench and Ballfield East of Sluice Trench	0/17	(0.121 - 0.177)	100%	--	--	--	--	0.121	0.177
	Stilling Pond	0/3	(0.2 - 0.2)	100%	--	--	--	--	0.2	0.2
Vanadium	Interim Ash Staging Area	26/33	(0.899 - 0.899)	21.2%	1.03	100	13.09	19.76	5.62	42.22
	Sluice Trench and Ballfield East of Sluice Trench	17/17	--	0%	0.926	187	42.05	54.46	12.8	135.8
	Stilling Pond	3/3	--	0%	48	96.3	69.1	24.72	63	92.97
Zinc	Interim Ash Staging Area	10/33	(2.42 - 3.22)	69.7%	3.65	26.1	4.285	5.449	3.22	13.21
	Sluice Trench and Ballfield East of Sluice Trench	7/17	(2.42 - 6.29)	58.8%	3.66	69.3	12.29	20.0	5.29	60.74
	Stilling Pond	3/3	--	0.0%	49.6	137	86.53	45.2	73	130.6

Summary Statistics - CCR Material Characteristics - Synthetic Precipitate Leaching Procedure (SPLP)										
Kingston Fossil Plant - Harriman, Tennessee										
Parameter	CCR Management Unit	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
<b>Additional Parameters</b>										
Iron	Interim Ash Staging Area	17/33	(14.1 - 19.5)	48.5%	14.8	8,940	426	1,572	19.5	1,714
	Sluice Trench and Ballfield East of Sluice Trench	10/17	(14.1 - 19.5)	41.2%	15.7	21,700	2,417	6,464	19.5	19,060
	Stilling Pond	3/3	--	0.0%	107	606	365	250	382	584
Manganese	Interim Ash Staging Area	31/33	(1.35 - 1.35)	6.06%	1.47	2,090	121	388.9	9.13	601.4
	Sluice Trench and Ballfield East of Sluice Trench	12/17	(1.35 - 1.35)	29.4%	1.43	138	17.46	34.0	2.88	70.16
	Stilling Pond	3/3	--	0.0%	4.62	20.2	10.76	8.3	7.45	18.93

Notes:

CCR Rule - Title 40, Code of Federal Regulations, Part 257

TDEC - Tennessee Department of Environment and Conservation

% - percent

"--" - Not Applicable

Except for pH & Radium 226 + 228, all units are micrograms per liter (µg/L).

Units for pH are Standard Units (S.U.).

Units for Radium 226+228 are picocuries per liter (pCi/L).

All non-detects reported at the method detection limit.

For Parameters with non-detects reported at the method detection limit, the mean and standard deviation were calculated using Kaplan-Meier methods (KM).

**Summary Statistics - CCR Material Characteristics - Pore Water - Total Metals  
Kingston Fossil Plant - Harriman, Tennessee**

Parameter	CCR Management Unit	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
<b>CCR Rule Appendix III Parameters</b>										
Boron	Interim Ash Staging Area	3/3	--	0%	797	3,830	2,646	1,622	3,310	3,778
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	2,160	2,600	2,380	311	2,380	2,578
	Stilling Pond	2/2	--	0%	1,080	11,000	6,040	7,014	6,040	10,504
Calcium	Interim Ash Staging Area	3/3	--	0%	174,000	521,000	349,667	173,541	354,000	504,300
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	136,000	288,000	212,000	107,480	212,000	280,400
	Stilling Pond	2/2	--	0%	85,700	189,000	137,350	73,044	137,350	183,835
Chloride	Interim Ash Staging Area	3/3	--	0%	9,400	34,200	18,833	13,422	12,900	32,070
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	6,990	12,200	9,595	3,684	9,595	11,940
	Stilling Pond	0/0	--	--	--	--	--	--	--	--
Fluoride	Interim Ash Staging Area	3/3	--	0%	268	463	351	100.7	322	448.9
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	192	325	258.5	94.05	258.5	318.4
	Stilling Pond	0/0	--	--	--	--	--	--	--	--
pH (field)	Interim Ash Staging Area	3/3	--	0%	6.84	6.93	6.873	0.0493	6.85	6.922
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	6.53	8.86	7.695	1.648	7.695	8.744
	Stilling Pond	2/2	--	0%	6.73	7.16	6.945	0.304	6.945	7.044
Sulfate	Interim Ash Staging Area	3/3	--	0%	376,000	1,420,000	887,333	522,327	866,000	1,364,600
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	300,000	902,000	601,000	425,678	601,000	871,900
	Stilling Pond	0/0	--	--	--	--	--	--	--	--
TDS	Interim Ash Staging Area	3/3	--	0%	850,000	2,580,000	1,703,333	865,236	1,680,000	2,490,000
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	659,000	1,670,000	1,164,500	714,885	1,164,500	1,619,450
	Stilling Pond	2/2	--	0%	345,000	882,000	613,500	379,716	613,500	855,150
<b>CCR Rule Appendix IV Parameters</b>										
Antimony	Interim Ash Staging Area	0/3	(0.378 - 0.378)	100%	--	--	--	--	0.378	0.378
	Sluice Trench and Ballfield East of Sluice Trench	1/2	(0.378 - 0.378)	50.0%	0.707	0.707	0.543	0.165	0.543	0.691
	Stilling Pond	0/2	(2.1 - 4.25)	100.0%	--	--	--	--	3.175	4.143
Arsenic	Interim Ash Staging Area	3/3	--	0%	229	382	304	76.54	301	373.9
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	79.4	365	222.2	201.9	222.2	350.7
	Stilling Pond	2/2	--	0%	676	1770	1223	773.6	1223	1715
Barium	Interim Ash Staging Area	3/3	--	0%	36.2	76.2	50.5	22.3	39.1	72.49
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	32.0	242	137	148.5	137	231.5
	Stilling Pond	2/2	--	0%	216.0	265	240.5	34.65	240.5	262.6
Beryllium	Interim Ash Staging Area	0/3	(0.155 - 0.155)	100%	--	--	--	--	0.155	0.155
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(0.155 - 0.155)	100%	--	--	--	--	0.155	0.155
	Stilling Pond	1/2	(0.131 - 0.131)	50%	0.346	0.346	0.239	0.108	0.239	0.335
Cadmium	Interim Ash Staging Area	1/3	(0.125 - 0.125)	66.7%	0.127	0.127	0.126	0.000943	0.125	0.127
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(0.125 - 0.125)	100%	--	--	--	--	0.125	0.125
	Stilling Pond	1/2	(0.0781 - 0.0781)	50%	0.589	0.59	0.334	0.255	0.334	0.563

**Summary Statistics - CCR Material Characteristics - Pore Water - Total Metals  
Kingston Fossil Plant - Harriman, Tennessee**

Parameter	CCR Management Unit	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
Chromium	Interim Ash Staging Area	0/3	(2.79 - 4.74)	100%	--	--	--	--	4.13	4.679
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(1.96 - 3.72)	100%	--	--	--	--	2.84	3.632
	Stilling Pond	0/2	(2.05 - 4.73)	100%	--	--	--	--	3.39	4.596
Cobalt	Interim Ash Staging Area	3/3	--	0%	0.393	3.10	1.39	1.489	0.673	2.86
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	0.257	0.350	0.304	0.0658	0.304	0.345
	Stilling Pond	2/2	--	0%	1.39	2.190	1.79	0.566	1.79	2.150
Fluoride	Interim Ash Staging Area	3/3	--	0%	268	463	351	100.7	322	448.9
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	192	325	258.5	94.05	258.5	318.4
	Stilling Pond	0/0	--	--	--	--	--	--	--	--
Lead	Interim Ash Staging Area	1/3	(0.128 - 0.128)	66.7%	0.671	0.671	0.309	0.256	0.128	0.617
	Sluice Trench and Ballfield East of Sluice Trench	1/2	(0.128 - 0.128)	50.0%	0.135	0.135	0.132	0.00350	0.132	0.135
	Stilling Pond	2/2	--	0.0%	1.21	4.51	2.86	2.33300	2.86	4.345
Lithium	Interim Ash Staging Area	3/3	--	0%	192	528	335.7	173.2	287	503.9
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	47.8	308	177.9	184	177.9	295
	Stilling Pond	1/2	(14.5 - 14.5)	50%	159	159	86.75	72.25	86.75	151.8
Mercury	Interim Ash Staging Area	0/3	(0.101 - 0.101)	100%	--	--	--	--	0.101	0.101
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(0.101 - 0.101)	100%	--	--	--	--	0.101	0.101
	Stilling Pond	0/2	(0.0653 - 0.0653)	100%	--	--	--	--	0.0653	0.0653
Molybdenum	Interim Ash Staging Area	3/3	--	0%	120	450	320.3	176	391	444.1
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	193	195	194	1.414	194	194.9
	Stilling Pond	2/2	--	0%	74.2	3310	1692	2288	1692	3148
Radium-226+228	Interim Ash Staging Area	2/2	--	0.0%	0.359	0.620	0.49	0.185	0.490	0.607
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	0.257	0.544	0.401	0.203	0.401	0.530
	Stilling Pond	0/0	--	--	--	--	--	--	--	--
Selenium	Interim Ash Staging Area	0/3	(2.62 - 2.62)	100%	--	--	--	--	2.62	2.62
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(2.62 - 2.62)	100%	--	--	--	--	2.62	2.62
	Stilling Pond	1/2	(1.27 - 1.27)	50%	1.38	1.38	1.325	0.055	1.325	1.375
Thallium	Interim Ash Staging Area	2/3	(0.128 - 0.128)	33.3%	0.149	0.491	0.256	0.166	0.149	0.457
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(0.128 - 0.128)	100%	--	--	--	--	0.128	0.128
	Stilling Pond	2/2	--	0%	0.198	0.768	0.483	0.403	0.483	0.74
<b>TDEC Appendix I Parameters</b>										
Copper	Interim Ash Staging Area	3/3	--	0%	0.758	1.60	1.136	0.428	1.05	1.545
	Sluice Trench and Ballfield East of Sluice Trench	1/2	(0.627 - 0.627)	50.0%	0.667	0.667	0.647	0.0200	0.647	0.67
	Stilling Pond	1/2	(3.45 - 3.45)	50.0%	8.49	8.49	5.97	2.5200	5.97	8.24
Nickel	Interim Ash Staging Area	3/3	--	0%	0.998	3.91	2.44	1.456	2.42	3.761
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	0.866	1.94	1.40	0.759	1.40	1.886
	Stilling Pond	2/2	--	0%	2.66	6.46	4.56	2.687	4.56	6.27
Silver	Interim Ash Staging Area	0/3	(0.121 - 0.121)	100%	--	--	--	--	0.121	0.121
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(0.121 - 0.121)	100%	--	--	--	--	0.121	0.121
	Stilling Pond	0/2	(0.2 - 0.2)	100%	--	--	--	--	0.2	0.2

Summary Statistics - CCR Material Characteristics - Pore Water - Total Metals Kingston Fossil Plant - Harriman, Tennessee										
Parameter	CCR Management Unit	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
Vanadium	Interim Ash Staging Area	0/3	(1.73 - 3.9)	100%	--	--	--	--	2.59	3.769
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(2.37 - 13.4)	100%	--	--	--	--	7.885	12.85
	Stilling Pond	2/2	--	0%	6.03	14.8	10.42	6.201	10.42	14.36
Zinc	Interim Ash Staging Area	3/3	--	0%	5.41	10.3	7.407	2.57	6.51	9.921
	Sluice Trench and Ballfield East of Sluice Trench	1/2	(3.22 - 3.22)	50.0%	45.3	45.3	24.26	21.0	24.26	43.2
	Stilling Pond	2/2	--	0.0%	5.37	12.1	8.735	4.8	8.735	11.76
Additional Water Quality Parameters										
Iron	Interim Ash Staging Area	3/3	--	0%	36,700	73,300	51,167	19,467	43,500	70,320
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	608	108,000	54,304	75,938	54,304	102,630
	Stilling Pond	2/2	--	0%	2,370	5,410	3,890	2,150	3,890	5,258
Manganese	Interim Ash Staging Area	3/3	--	0%	1,750	5,820	3,537	2,080	3,040	5,542
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	151	2,410	1,281	1,597	1,281	2,297
	Stilling Pond	2/2	--	0%	322	851	587	374	587	825
TOC	Interim Ash Staging Area	3/3	--	0%	916	2,120	1,344	673	996	2,008
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	1,190	4,290	2,740	2,192	2,740	4,135
	Stilling Pond	2/2	--	0%	2,070	3,810	2,940	1,230	2,940	3,723

**Notes:**

CCR Rule - Title 40, Code of Federal Regulations, Part 257

TDEC - Tennessee Department of Environment and Conservation

% - percent

"--" : Not Applicable

TDS - Total Dissolved Solids

TOC - Total Organic Carbon

Sample results collected from GP-17-102 at the Stilling Pond were excluded from the analysis due to elevated Turbidity (616.3 Nephelometric Turbidity Units).

Except for pH & Radium 226 + 228, all units micrograms per liter (µg/L).

Units for pH are Standard Units (S.U.).

Units for Radium 226+228 are picocuries per liter (pCi/L).

All non-detects reported at the laboratory detection limit.

For Parameters with non-detects reported at the method detection limit, the mean and standard deviation were calculated using Kaplan-Meier methods (KM).



**Summary Statistics - CCR Material Characteristics - Pore Water - Dissolved Metals  
Kingston Fossil Plant - Harriman, Tennessee**

Parameter	CCR Management Unit	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
<b>CCR Rule Appendix III Parameters</b>										
Boron	Interim Ash Staging Area	3/3	--	0%	762	3,550	2,534	1,540	3,290	3,524
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	2,080	2,610	2,345	375	2,345	2,584
	Stilling Pond	2/2	--	0%	1,170	10,000	5,585	6,244	5,585	9,559
Calcium	Interim Ash Staging Area	3/3	--	0%	163,000	517,000	343,333	177,094	350,000	500,300
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	134,000	298,000	216,000	115,966	216,000	289,800
	Stilling Pond	2/2	--	0%	75,300	185,000	130,150	77,570	130,150	179,515
<b>CCR Rule Appendix IV Parameters</b>										
Antimony	Interim Ash Staging Area	0/3	(0.378 - 0.378)	100%	--	--	--	--	0.378	0.378
	Sluice Trench and Ballfield East of Sluice Trench	1/2	(0.378 - 0.378)	50.0%	0.681	0.681	0.530	0.152	0.530	0.666
	Stilling Pond	1/2	(1.84 - 1.84)	50.0%	4.05	4.05	2.945	1.105	2.945	3.94
Arsenic	Interim Ash Staging Area	3/3	--	0%	180	372	280	96.25	288	363.6
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	78.4	349	214	191.3	213.7	335.5
	Stilling Pond	2/2	--	0%	598.0	1820	1209	864.1	1209	1759
Barium	Interim Ash Staging Area	3/3	--	0%	34.4	60.5	44.07	14.31	37.3	58.18
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	31.1	240	135.6	147.7	135.6	229.6
	Stilling Pond	2/2	--	0%	219	231	225	8.485	225	230.4
Beryllium	Interim Ash Staging Area	0/3	(0.155 - 0.155)	100%	--	--	--	--	0.155	0.155
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(0.155 - 0.155)	100%	--	--	--	--	0.155	0.155
	Stilling Pond	1/2	(0.131 - 0.131)	50%	0.391	0.391	0.261	0.13	0.261	0.378
Cadmium	Interim Ash Staging Area	0/3	(0.125 - 0.125)	100%	--	--	--	--	0.125	0.125
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(0.125 - 0.125)	100%	--	--	--	--	0.125	0.125
	Stilling Pond	2/2	--	0%	0.171	0.566	0.369	0.28	0.369	0.546
Chromium	Interim Ash Staging Area	0/3	(2.24 - 3.53)	100%	--	--	--	--	3.13	3.49
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(1.53 - 2.96)	100%	--	--	--	--	2.245	2.89
	Stilling Pond	1/2	(0.85 - 0.85)	50%	5.76	5.76	3.305	2.455	3.305	5.52
Cobalt	Interim Ash Staging Area	3/3	--	0%	0.369	2.88	1.228	1.431	0.436	2.636
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	0.243	0.313	0.278	0.0495	0.278	0.310
	Stilling Pond	2/2	--	0%	0.658	2.79	1.724	1.508	1.724	2.683
Lead	Interim Ash Staging Area	0/3	(0.128 - 0.128)	100%	--	--	--	--	0.128	0.128
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(0.128 - 0.128)	100%	--	--	--	--	0.128	0.128
	Stilling Pond	1/2	(0.318 - 0.318)	50%	4.6	4.6	2.459	2.141	2.459	4.386
Lithium	Interim Ash Staging Area	3/3	--	0%	181	555	338.7	193.8	280	527.5
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	48.6	317	182.8	189.8	182.8	303.6
	Stilling Pond	2/2	--	0%	19.7	173	96.35	108.4	96.35	165.3

**Summary Statistics - CCR Material Characteristics - Pore Water - Dissolved Metals  
Kingston Fossil Plant - Harriman, Tennessee**

Parameter	CCR Management Unit	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
Mercury	Interim Ash Staging Area	0/3	(0.101 - 0.101)	100%	--	--	--	--	0.101	0.101
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(0.101 - 0.101)	100%	--	--	--	--	0.101	0.101
	Stilling Pond	0/2	(0.0653 - 0.0653)	100%	--	--	--	--	0.0653	0.0653
Molybdenum	Interim Ash Staging Area	3/3	--	0%	115	443	314.3	175	385	437.2
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	195	196	195.5	0.707	195.5	196
	Stilling Pond	2/2	--	0%	67.5	3520	1794	2441	1794	3347
Selenium	Interim Ash Staging Area	0/3	(2.62 - 2.62)	100%	--	--	--	--	2.62	2.62
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(2.62 - 2.62)	100%	--	--	--	--	2.62	2.62
	Stilling Pond	0/2	(1.27 - 1.27)	100%	--	--	--	--	1.27	1.27
Thallium	Interim Ash Staging Area	1/3	(0.128 - 0.128)	66.7%	0.442	0.442	0.233	0.148	0.128	0.411
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(0.128 - 0.128)	100%	--	--	--	--	0.128	0.128
	Stilling Pond	2/2	--	0%	0.399	0.425	0.412	0.0184	0.412	0.424
<b>TDEC Appendix I Parameters</b>										
Copper	Interim Ash Staging Area	1/3	(0.627 - 0.627)	66.7%	0.905	0.905	0.720	0.131	0.627	0.877
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(0.627 - 0.627)	100%	--	--	--	--	0.627	0.63
	Stilling Pond	1/2	(1.04 - 1.04)	50%	10.1	10.1	5.57	4.53	5.57	9.65
Nickel	Interim Ash Staging Area	1/3	(0.809 - 1.68)	66.7%	3.96	3.96	1.859	1.485	1.68	3.732
	Sluice Trench and Ballfield East of Sluice Trench	1/2	(0.912 - 0.912)	50.0%	1.90	1.90	1.406	0.494	1.406	1.85
	Stilling Pond	2/2	--	0.0%	1.89	6.10	3.995	2.977	3.995	5.89
Silver	Interim Ash Staging Area	0/3	(0.121 - 0.121)	100%	--	--	--	--	0.121	0.121
	Sluice Trench and Ballfield East of Sluice Trench	0/2	(0.121 - 0.121)	100%	--	--	--	--	0.121	0.121
	Stilling Pond	0/2	(0.2 - 0.2)	100%	--	--	--	--	0.2	0.2
Vanadium	Interim Ash Staging Area	0/3	(1.4 - 2.12)	100%	--	--	--	--	1.87	2.10
	Sluice Trench and Ballfield East of Sluice Trench	1/2	(1.64 - 1.64)	50.0%	11.3	11.3	6.47	4.83	6.47	10.82
	Stilling Pond	1/2	(4.45 - 4.45)	50.0%	16.6	16.6	10.53	6.075	10.53	15.99
Zinc	Interim Ash Staging Area	3/3	--	0%	4.41	9.65	6.677	2.691	5.97	9.282
	Sluice Trench and Ballfield East of Sluice Trench	1/2	(3.22 - 3.22)	50.0%	44.7	44.7	24.0	20.74	24.0	42.63
	Stilling Pond	1/2	(2.65 - 2.65)	50.0%	9.86	9.86	6.3	3.605	6.3	9.5

Summary Statistics - CCR Material Characteristics - Pore Water - Dissolved Metals Kingston Fossil Plant - Harriman, Tennessee										
Parameter	CCR Management Unit	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
					Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
<b>Additional Water Quality Parameters</b>										
Iron	Interim Ash Staging Area	3/3	--	0%	31,900	73,300	49,333	21,459	42,800	70,250
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	188	107,000	53,594	75,527	53,594	101,659
	Stilling Pond	2/2	--	0%	3,190	3,370	3,280	127	3,280	3,361
Manganese	Interim Ash Staging Area	3/3	--	0%	1,680	5,770	3,473	2,091	2,970	5,490
	Sluice Trench and Ballfield East of Sluice Trench	2/2	--	0%	155	2,430	1,293	1,609	1,293	2,316
	Stilling Pond	2/2	--	0%	272	748	510	337	510	724

**Notes:**

CCR Rule - Title 40, Code of Federal Regulations, Part 257

TDEC - Tennessee Department of Environment and Conservation

% - percent

"--" : Not Applicable

Sample results collected from GP-17-102 at the Stilling Pond were excluded from the analysis due to elevated Turbidity (616.3 Nephelometric Turbidity Units).

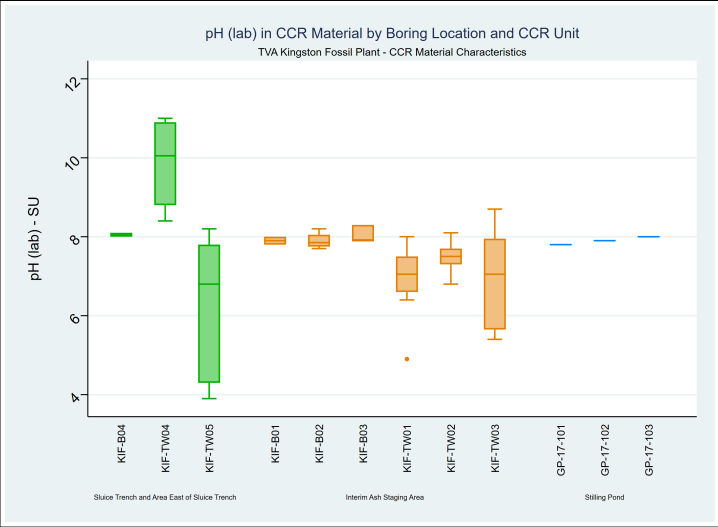
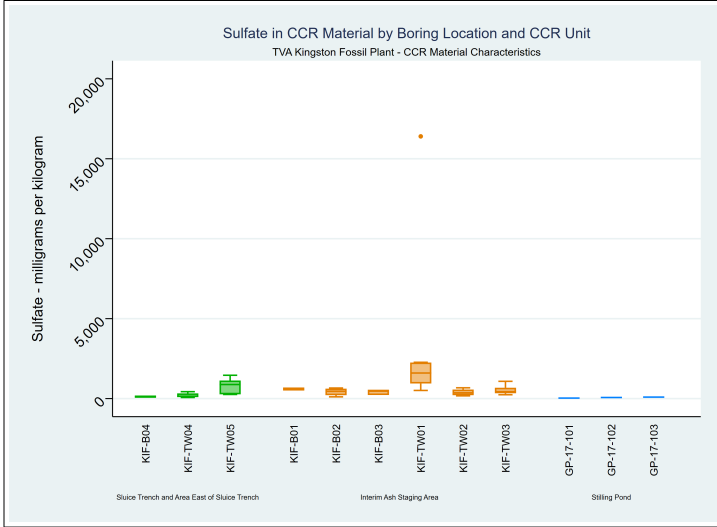
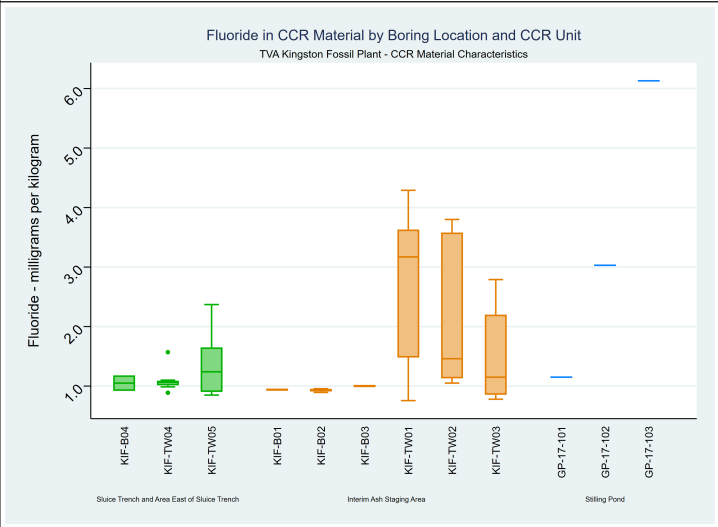
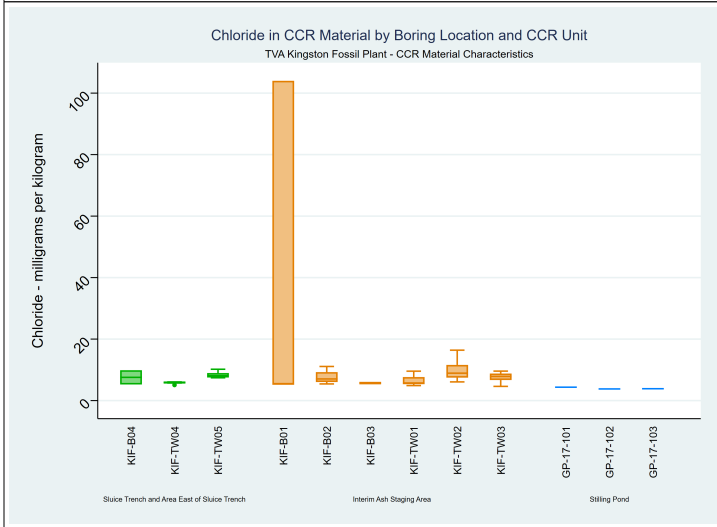
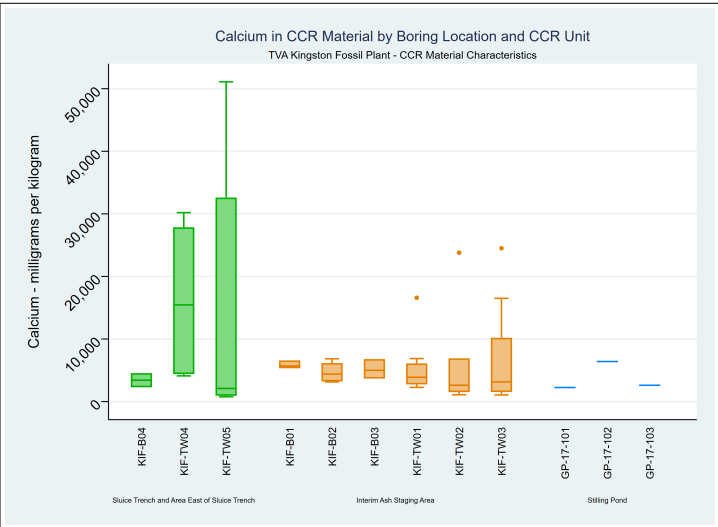
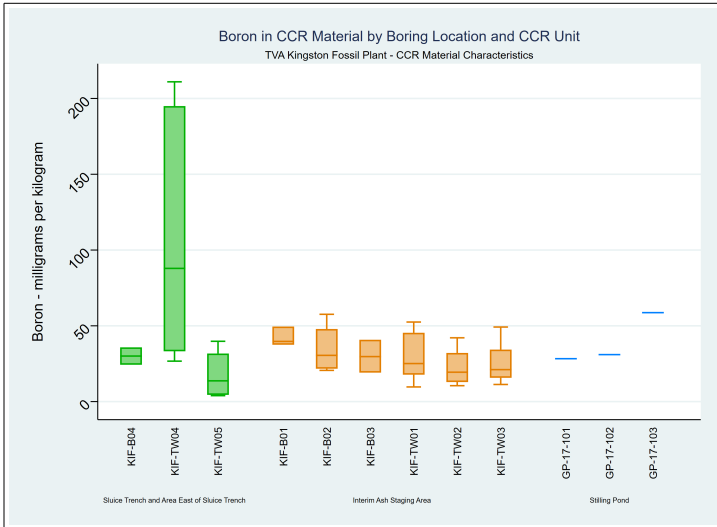
All units in micrograms per liter (µg/L)

All non-detects reported at the laboratory detection limit

For Parameters with non-detects reported at the method detection limit, the mean and standard deviation were calculated using Kaplan-Meier methods (KM).

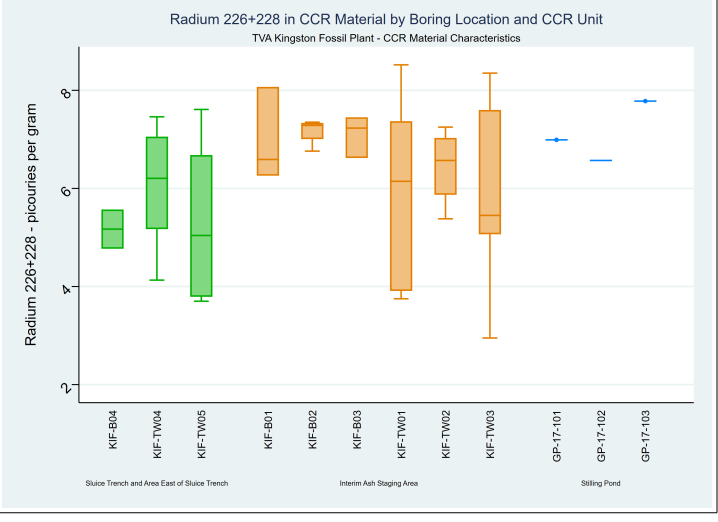
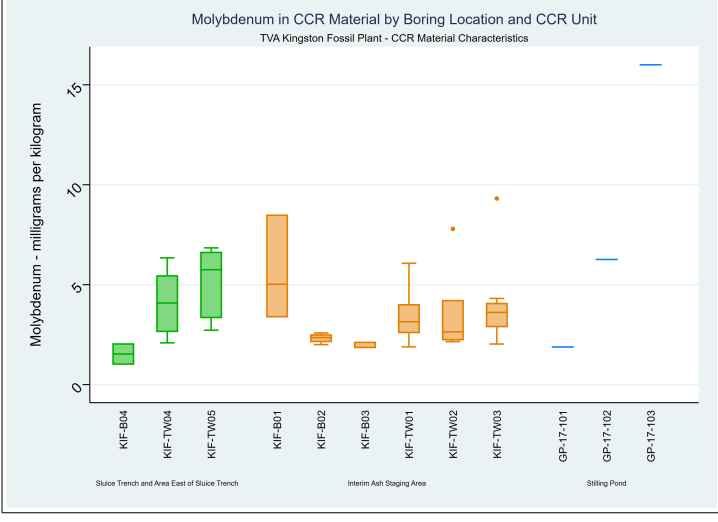
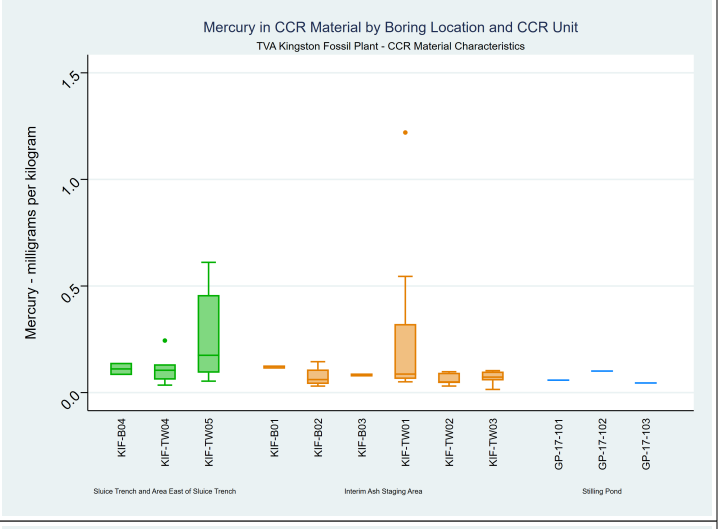
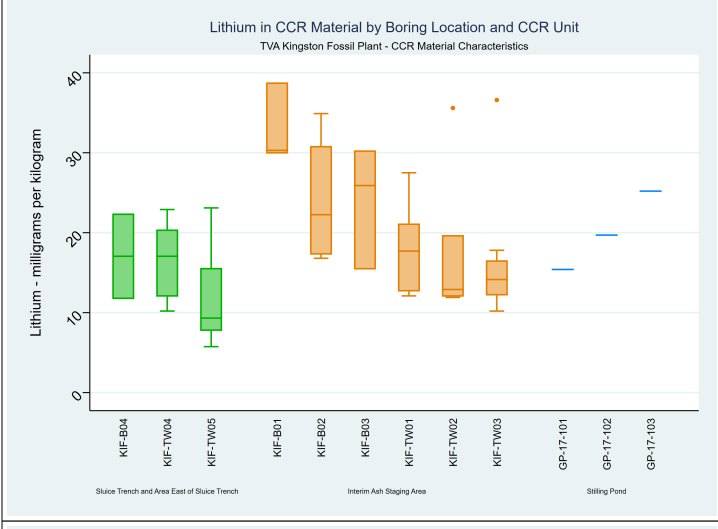
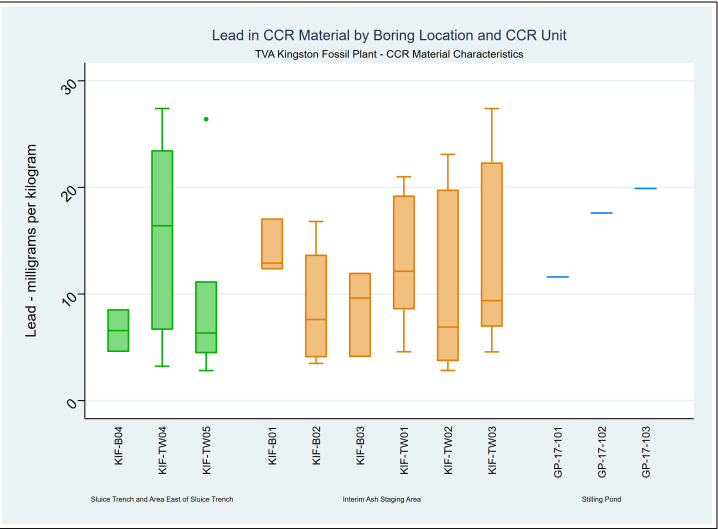
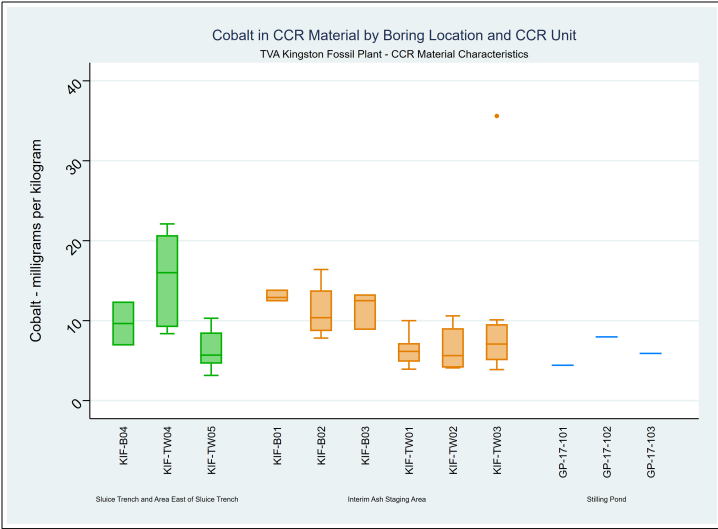
**ATTACHMENT E.2-B  
BOX PLOTS – CCR MATERIAL**

Box Plots  
 CCR Rule Appendix III Parameters  
 CCR Material Characteristics Investigation  
 Kingston Fossil Plant - Harriman, Tennessee

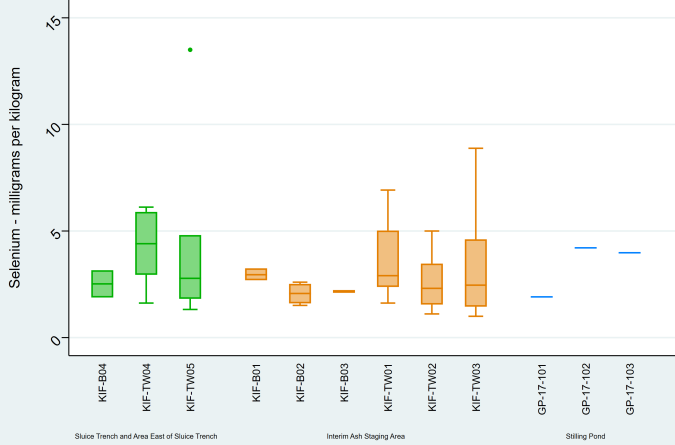


Box Plots  
 CCR Rule Appendix IV Parameters  
 CCR Material Characteristics Investigation  
 Kingston Fossil Plant - Harriman, Tennessee

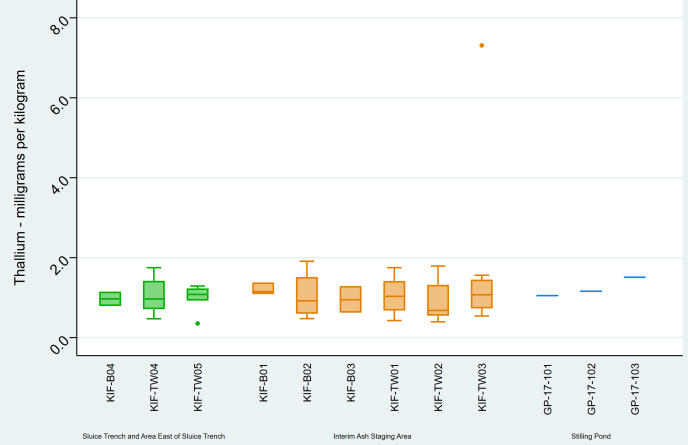




Selenium in CCR Material by Boring Location and CCR Unit  
TVA Kingston Fossil Plant - CCR Material Characteristics

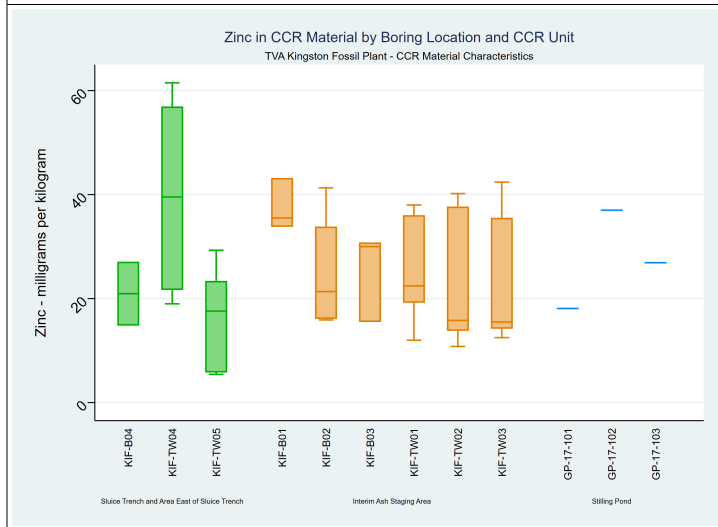
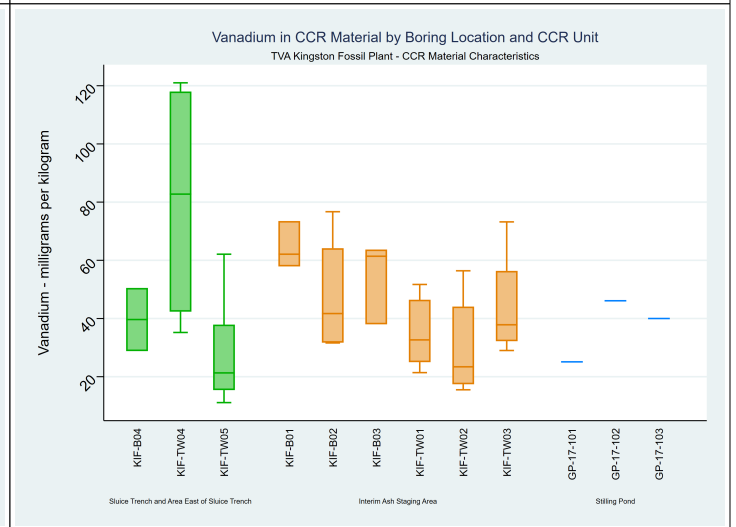
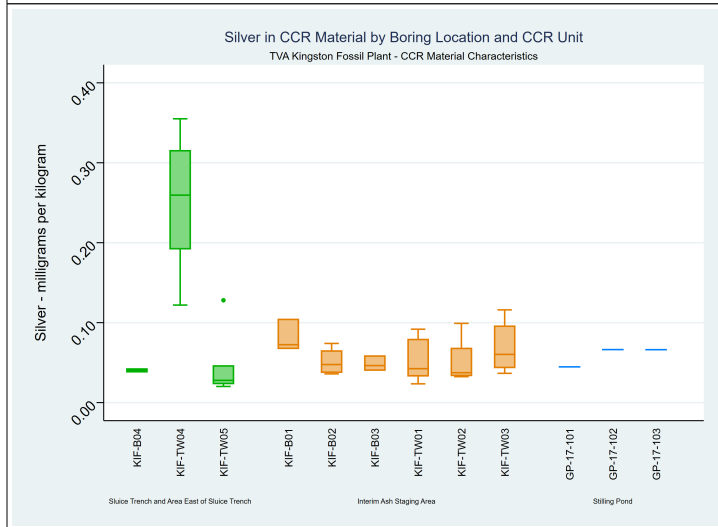
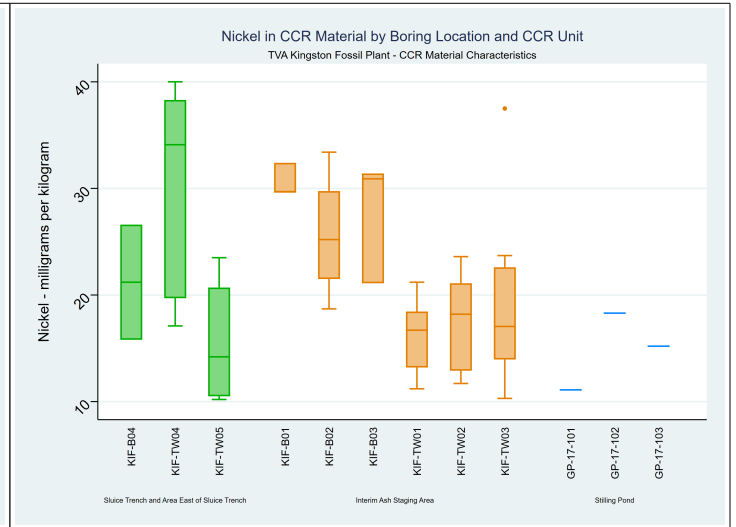
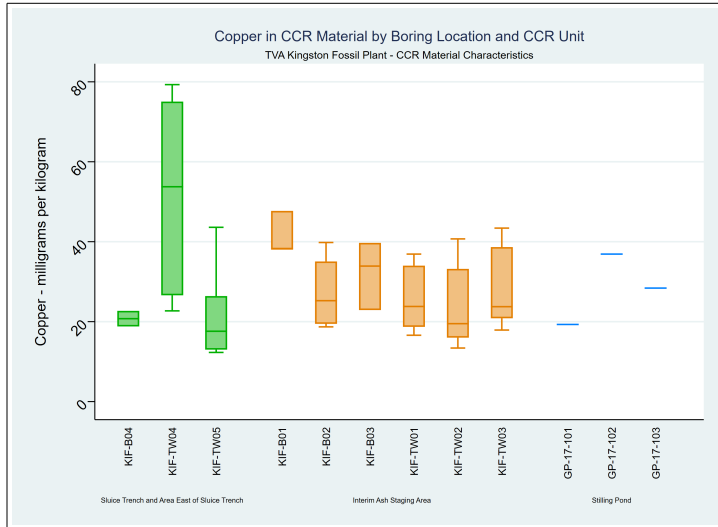


Thallium in CCR Material by Boring Location and CCR Unit  
TVA Kingston Fossil Plant - CCR Material Characteristics





Box Plots  
TDEC Appendix I Parameters  
CCR Material Characteristics Investigation  
Kingston Fossil Plant - Harriman, Tennessee

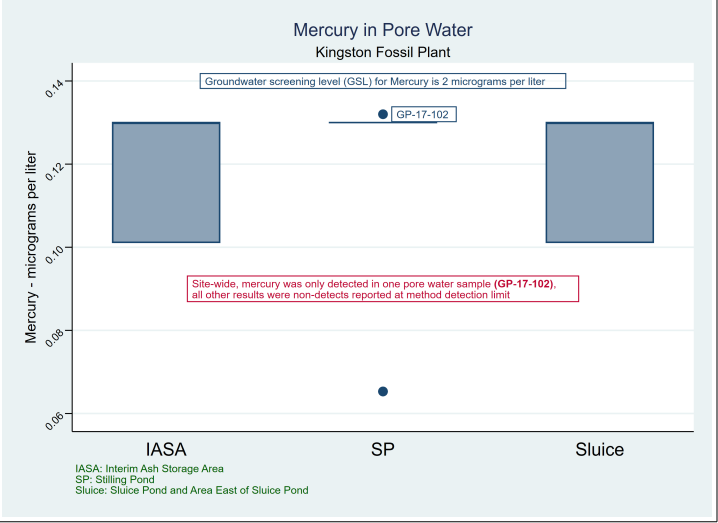
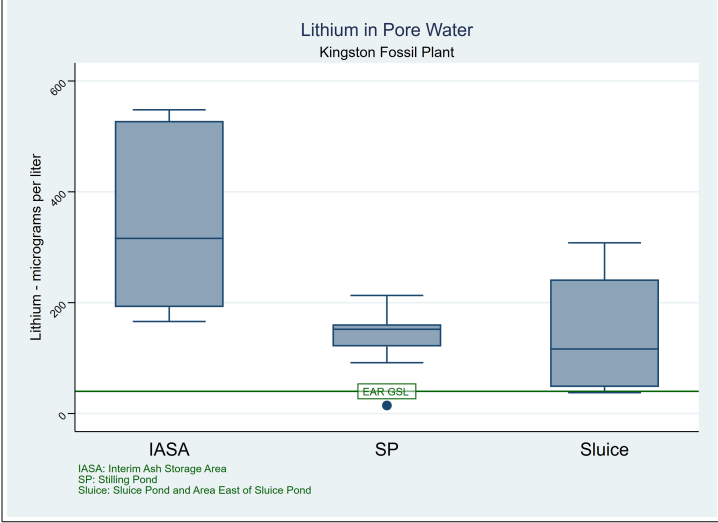
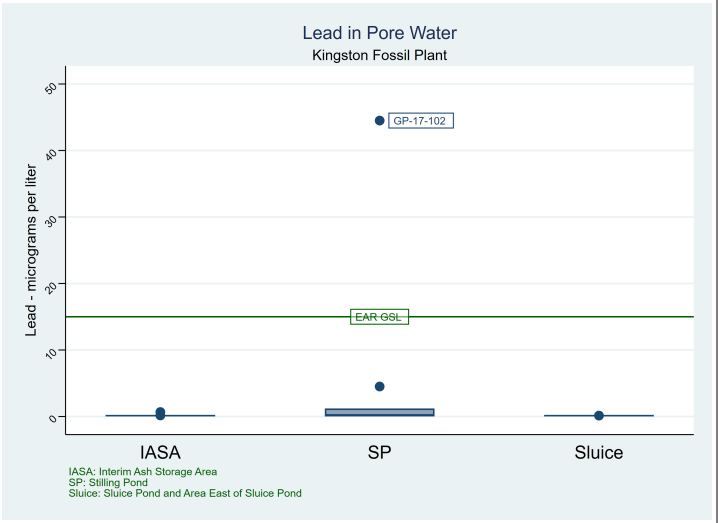
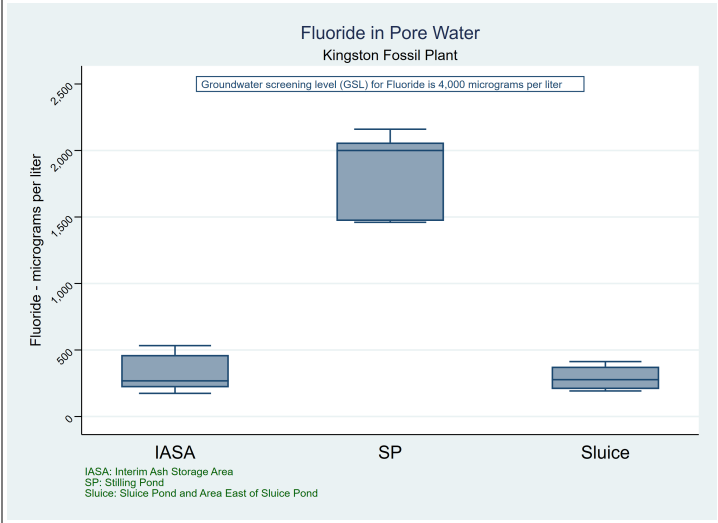
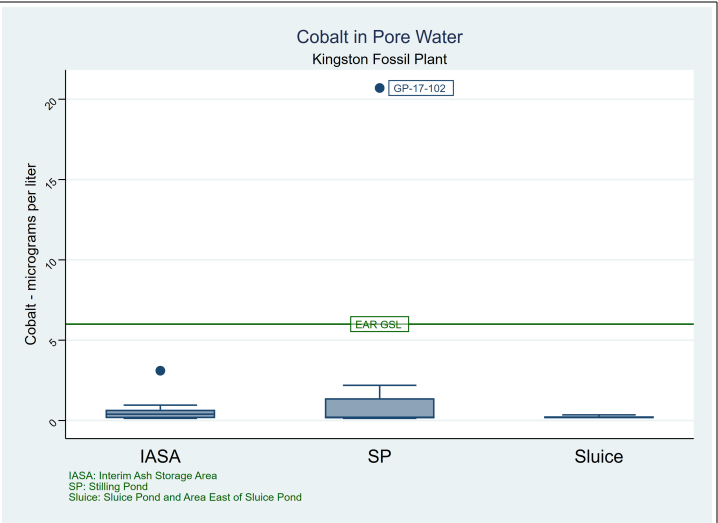
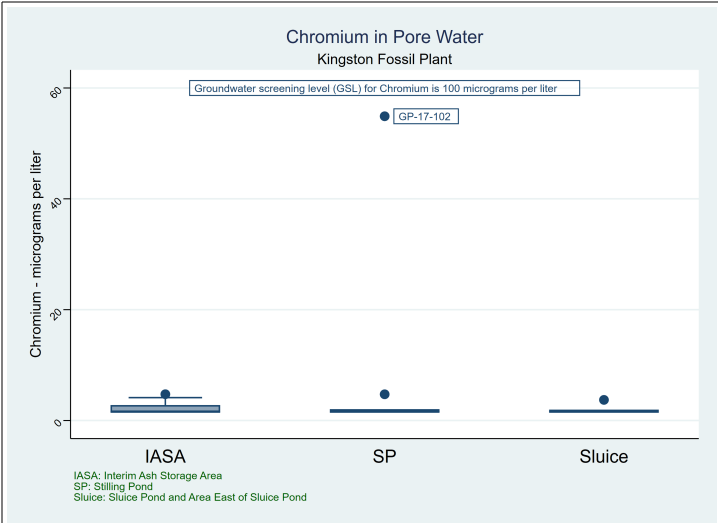


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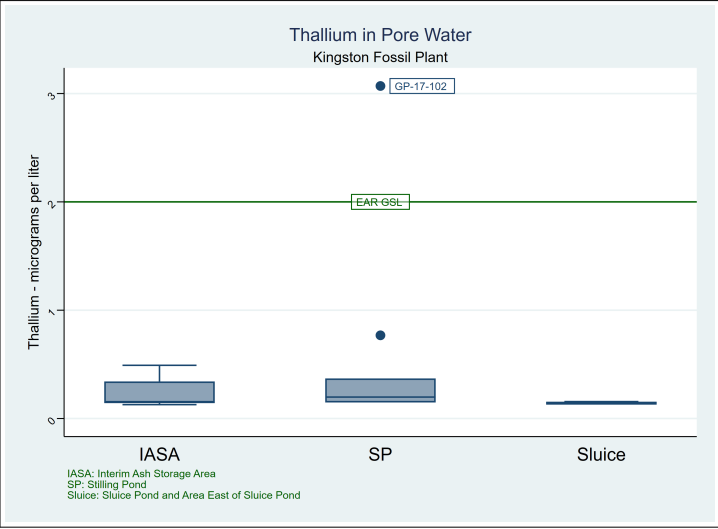
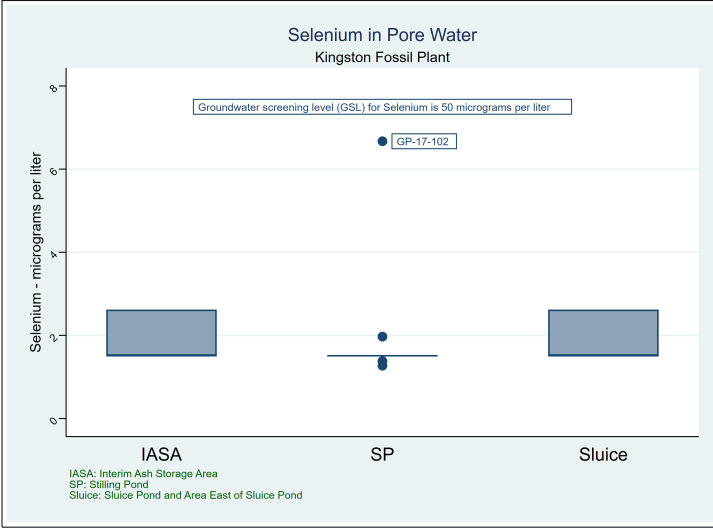
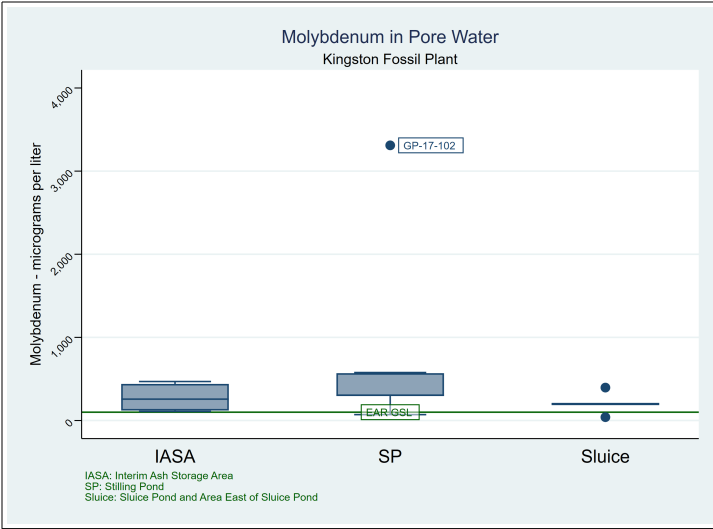
**ATTACHMENT E.2-C  
BOX PLOTS – PORE WATER OUTLIER  
ANALYSIS**

Box Plots - Pore Water Outlier Analysis  
 CCR Rule Appendix IV Parameters  
 Pore Water Investigation  
 Kingston Fossil Plant - Harriman, Tennessee

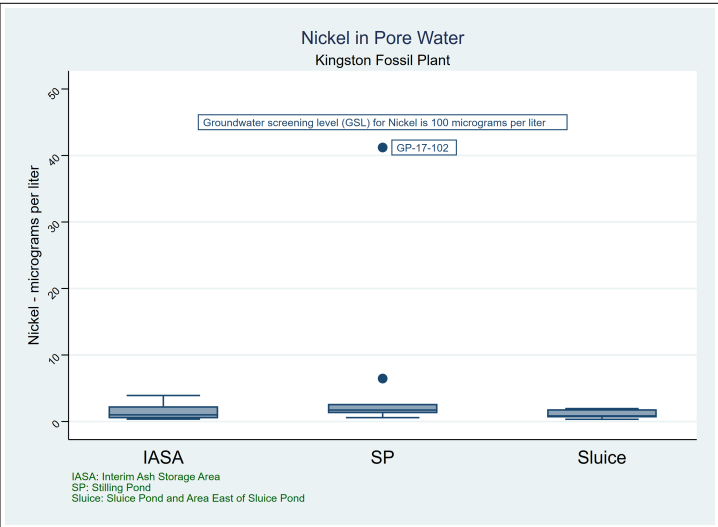
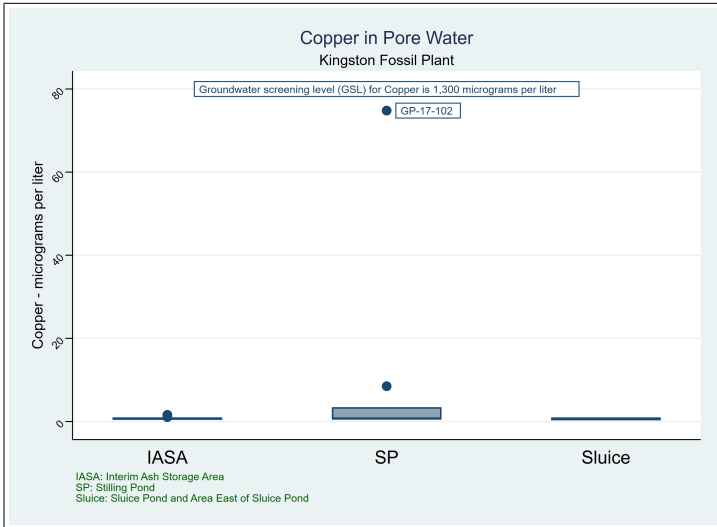




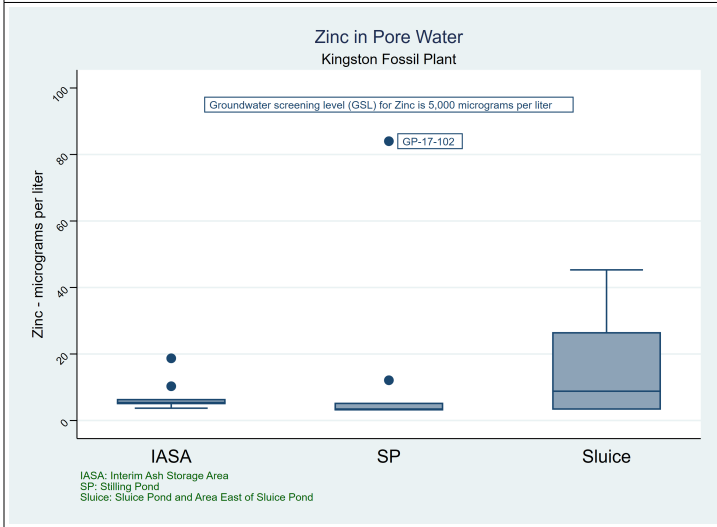
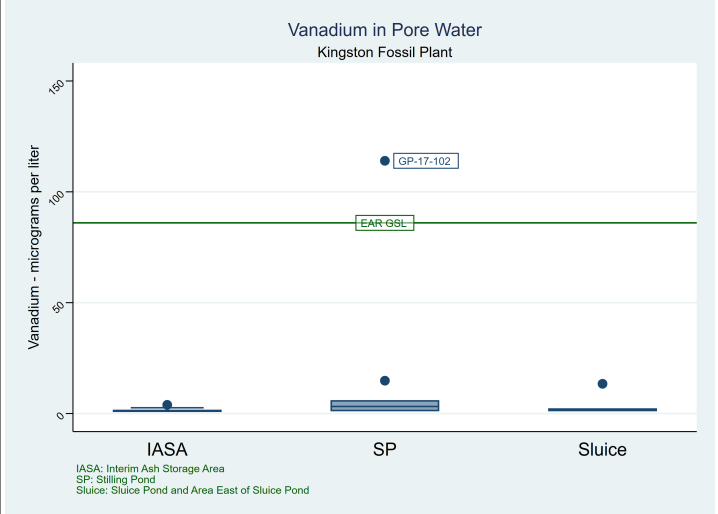
Results for Radium 226+228 were not Reported for GP-17-101, GP-17-102, or GP-17-103



Box Plots - Pore Water Outlier Analysis  
 TDEC Appendix I Parameters  
 Pore Water Investigation  
 Kingston Fossil Plant - Harriman, Tennessee



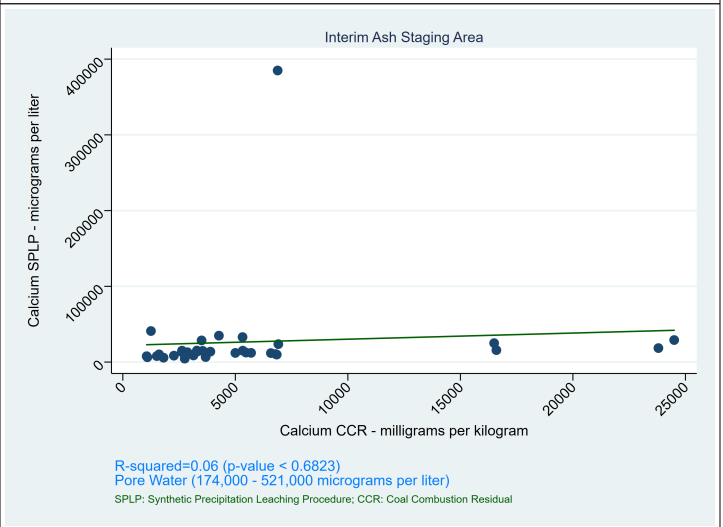
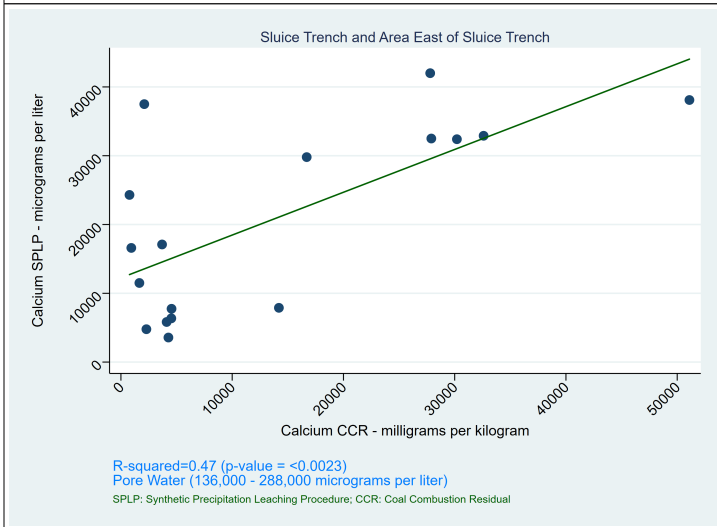
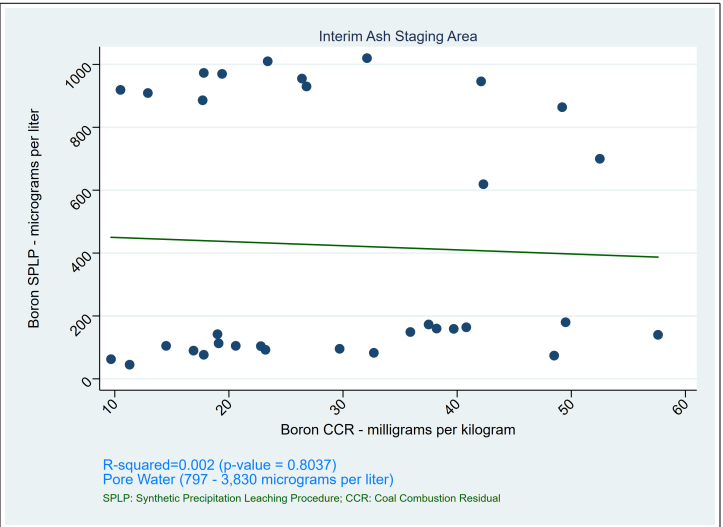
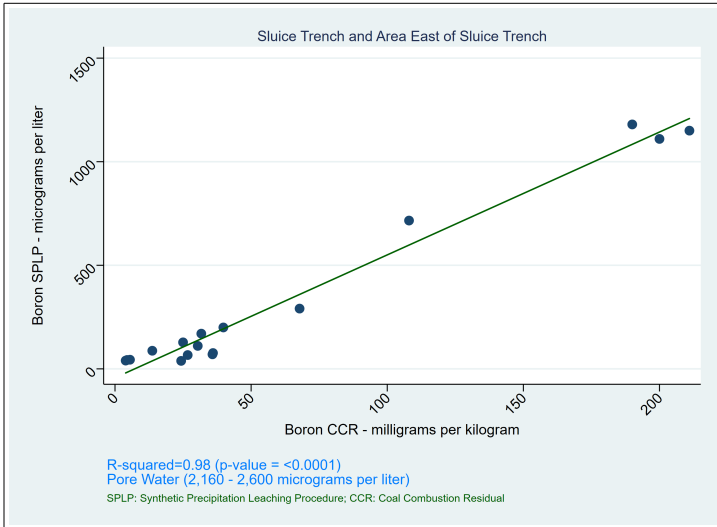
Silver was not detected above the method detection limit in any pore water sample



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**ATTACHMENT E.2-D  
SCATTER PLOTS AND REGRESSION**

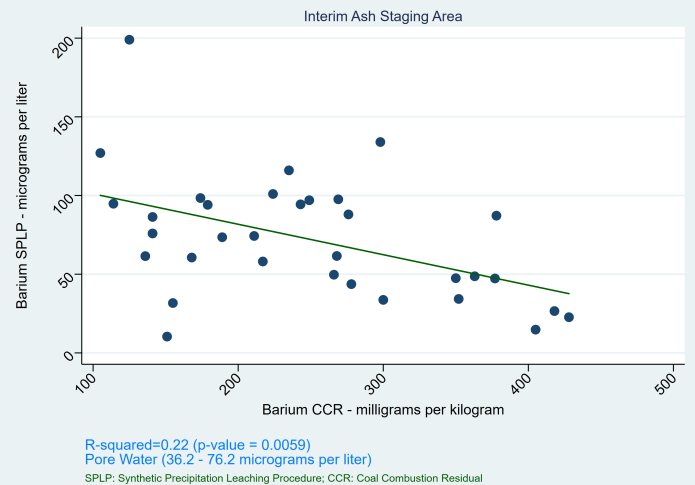
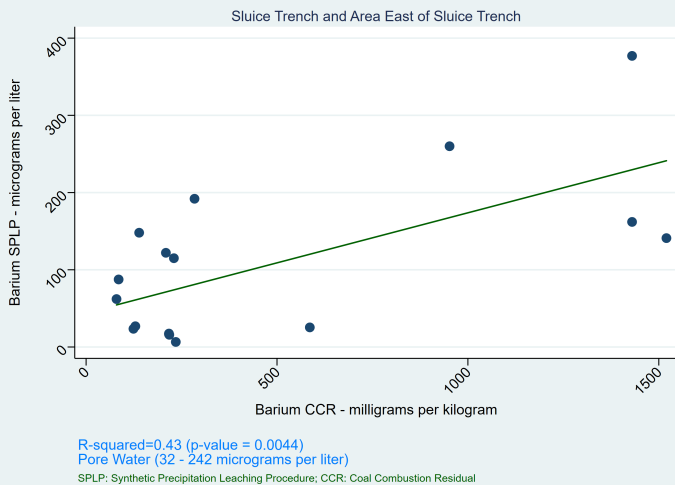
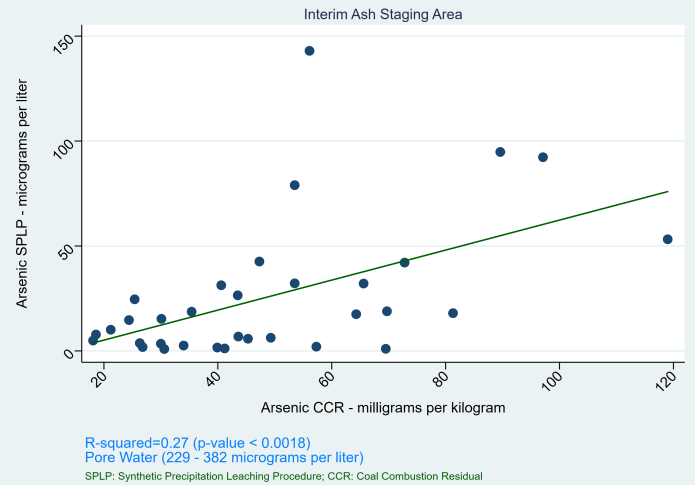
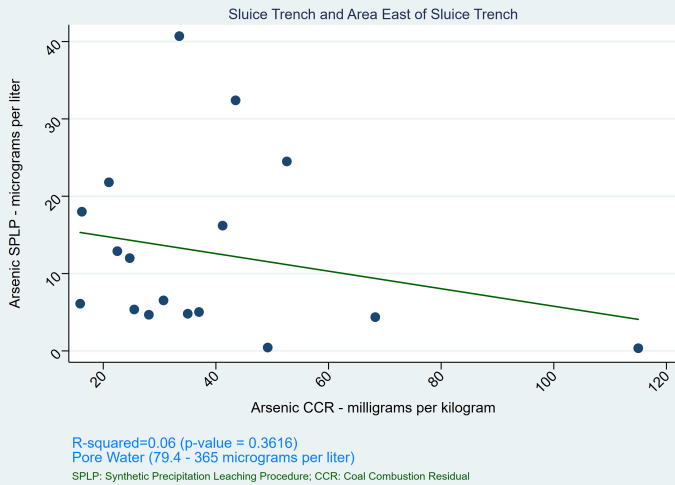
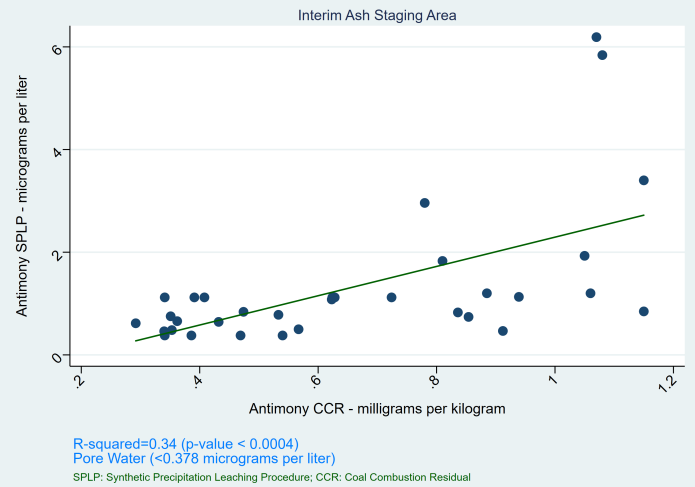
Scatter Plots (SPLP and CCR Material)  
 CCR Rule Appendix III Parameters  
 CCR Material Characteristics Investigation  
 Kingston Fossil Plant - Harriman, Tennessee





Scatter Plots (SPLP and CCR Material)  
 CCR Rule Appendix IV Parameters  
 CCR Material Characteristics Investigation  
 Kingston Fossil Plant - Harriman, Tennessee

Antimony/Sluice Trench and Area East of Sluice Trench, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets



Beryllium/Sluice Trench and Area East of Sluice Trench, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets

Beryllium/Interim Ash Staging Area, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets

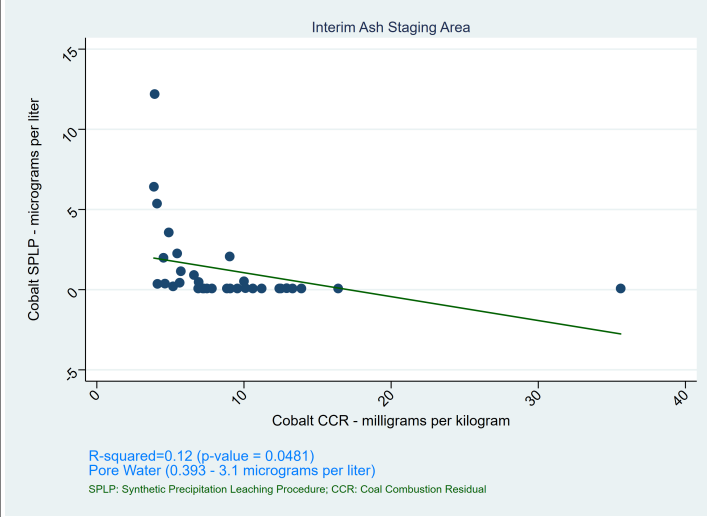
Cadmium/Sluice Trench and Area East of Sluice Trench, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets

Cadmium/Interim Ash Staging Area, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets

Chromium/Sluice Trench and Area East of Sluice Trench, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets

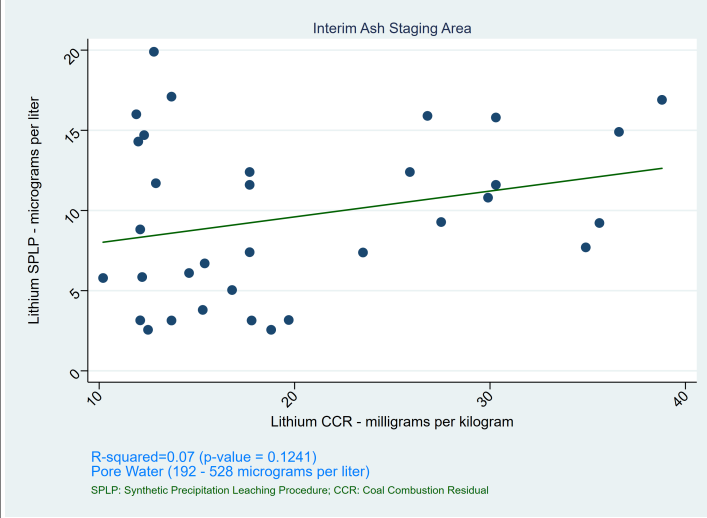
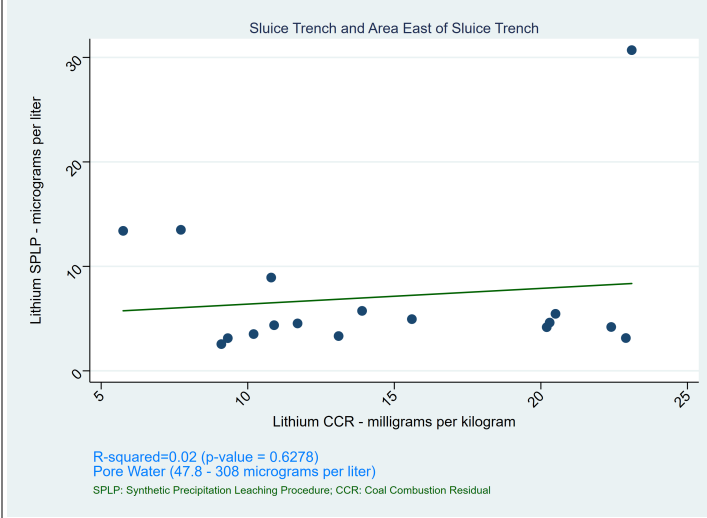
Chromium/Interim Ash Staging Area, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets

Cobalt/Sluice Trench and Area East of Sluice Trench, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets



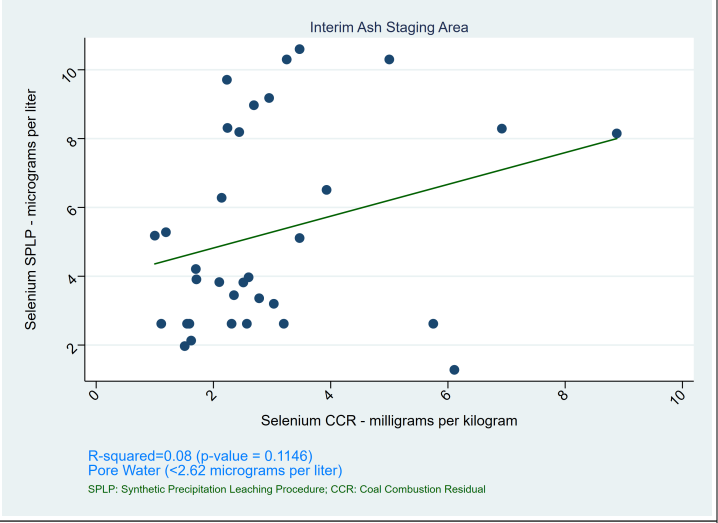
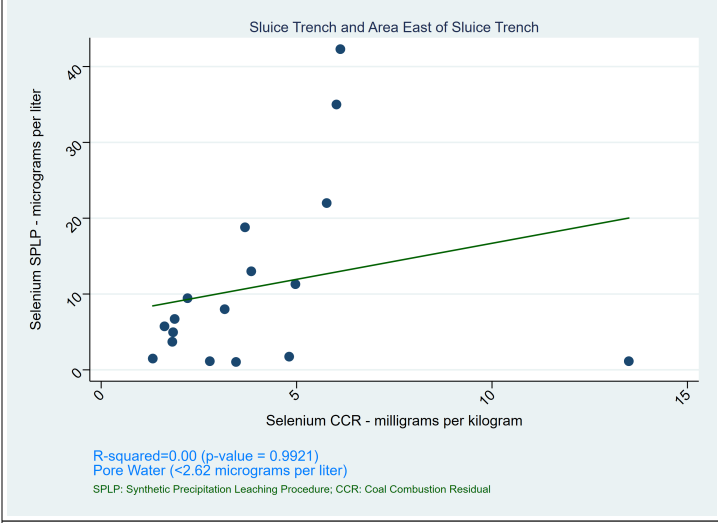
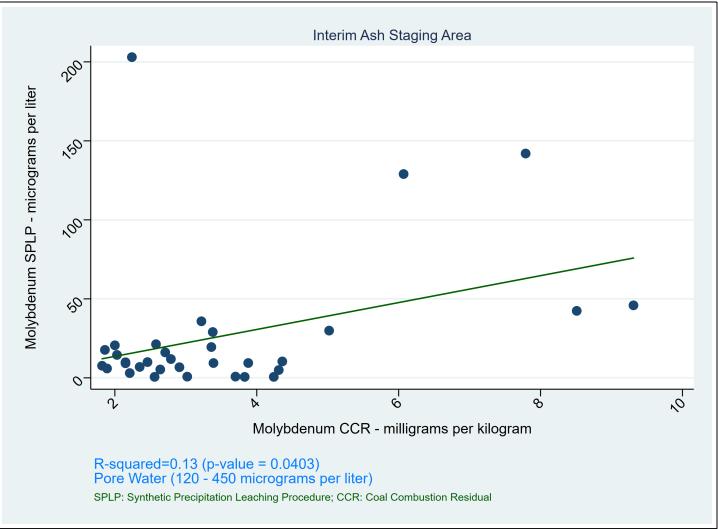
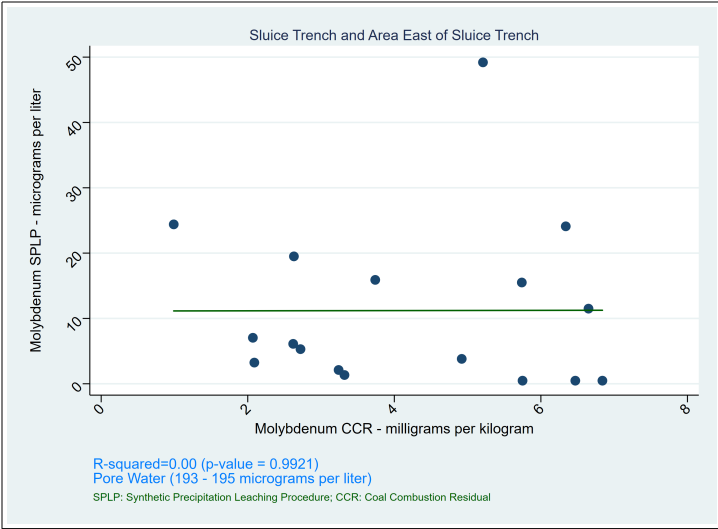
Lead/Sluice Trench and Area East of Sluice Trench, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets

Lead/Interim Ash Staging Area, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets



Mercury/Sluice Trench and Area East of Sluice Trench, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets

Mercury/Interim Ash Staging Area, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets



Thallium/Sluice Trench and Area East of Sluice Trench, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets

Thallium/Interim Ash Staging Area, Insufficient Data, > 50% non-Detects in SPLP or CCR Material Data Sets

Scatter Plots (SPLP and CCR Material)  
 TDEC Appendix I Parameters  
 CCR Material Characteristics Investigation  
 Kingston Fossil Plant - Harriman, Tennessee

<p>Copper/Sluice Trench and Area East of Sluice Trench, Insufficient Data, &gt; 50% non-Detects in SPLP or CCR Material Data Sets</p>	<p>Copper/Interim Ash Staging Area, Insufficient Data, &gt; 50% non-Detects in SPLP or CCR Material Data Sets</p>
<p>Sluice Trench and Area East of Sluice Trench</p> <p>Nickel SPLP - micrograms per liter</p> <p>Nickel CCR - milligrams per kilogram</p> <p>R-squared=0.15 (p-value = 0.1196)      Pore Water (0.866 - 1.94 micrograms per liter)      SPLP: Synthetic Precipitation Leaching Procedure; CCR: Coal Combustion Residual</p>	<p>Nickel/Interim Ash Staging Area, Insufficient Data, &gt; 50% non-Detects in SPLP or CCR Material Data Sets</p>
<p>Silver/Sluice Trench and Area East of Sluice Trench, Insufficient Data, &gt; 50% non-Detects in SPLP or CCR Material Data Sets</p>	<p>Silver/Interim Ash Staging Area, Insufficient Data, &gt; 50% non-Detects in SPLP or CCR Material Data Sets</p>
<p>Sluice Trench and Area East of Sluice Trench</p> <p>Vanadium SPLP - micrograms per liter</p> <p>Vanadium CCR - milligrams per kilogram</p> <p>R-squared=0.60 (p-value = 0.0003)      Pore Water (&lt;2.37 - &lt;13.4 micrograms per liter)      SPLP: Synthetic Precipitation Leaching Procedure; CCR: Coal Combustion Residual</p>	<p>Interim Ash Staging Area</p> <p>Vanadium SPLP - micrograms per liter</p> <p>Vanadium CCR - milligrams per kilogram</p> <p>R-squared=0.20 (p-value = 0.0093)      Pore Water (&lt;1.73 - &lt;3.9 micrograms per liter)      SPLP: Synthetic Precipitation Leaching Procedure; CCR: Coal Combustion Residual</p>
<p>Zinc/Sluice Trench and Area East of Sluice Trench, Insufficient Data, &gt; 50% non-Detects in SPLP or CCR Material Data Sets</p>	<p>Zinc/Interim Ash Staging Area, Insufficient Data, &gt; 50% non-Detects in SPLP or CCR Material Data Sets</p>

**APPENDIX E.3**  
**STATISTICAL ANALYSIS OF GROUNDWATER**  
**ANALYTICAL RESULTS**



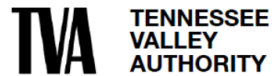
**Appendix E.3 - Statistical  
Analysis of Groundwater  
Analytical Results**

TDEC Commissioner's Order:  
Environmental Assessment Report  
Kingston Fossil Plant  
Harriman, Tennessee

March 12, 2024

Prepared for:

Tennessee Valley Authority  
Chattanooga, Tennessee



Prepared by:

Stantec Consulting Services Inc.  
Lexington, Kentucky

## APPENDIX E.3 - STATISTICAL ANALYSIS OF GROUNDWATER ANALYTICAL RESULTS

### REVISION LOG

<b>Revision</b>	<b>Description</b>	<b>Date</b>
0	EAR Submittal to TDEC	May 30, 2023
1	Addresses August 16, 2023 TDEC Review Comments and Issued for TDEC	November 14, 2023
2	Addresses January 12, 2024 TDEC Review Comments and Issued for TDEC	March 12, 2024




## Sign-off Sheet

This document entitled Appendix E.3 - Statistical Analysis of Groundwater Analytical Results was prepared by Stantec Consulting Services Inc. ("Stantec") for the account of Tennessee Valley Authority (the "Client"). Any reliance on this document by any third party is strictly prohibited. The material in it reflects Stantec's professional judgment in light of the scope, schedule and other limitations stated in the document and in the contract between Stantec and the Client. The opinions in the document are based on conditions and information existing at the time the document was published and do not consider any subsequent changes. In preparing the document, Stantec did not verify information supplied to it by others. Any use which a third party makes of this document is the responsibility of such third party. Such third party agrees that Stantec shall not be responsible for costs or damages of any kind, if any, suffered by it or any other third party as a result of decisions made or actions taken based on this document.

Prepared by 

**Melissa Whitfield Aslund, PhD, Environmental Scientist**

Reviewed by 

**Chris LaLonde, Senior Risk Assessor**

Approved by 

**Rebekah Brooks, PG, Senior Principal Hydrogeologist**





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## APPENDIX E.3 - STATISTICAL ANALYSIS OF GROUNDWATER ANALYTICAL RESULTS

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ATTACHMENT E.3-B	BOX PLOTS
ATTACHMENT E.3-C	TIME SERIES PLOTS
ATTACHMENT E.3-D	LINEAR REGRESSION PLOTS
ATTACHMENT E.3-E	LINEAR REGRESSION RESULTS



## Abbreviations

CASRN	Chemical Abstracts Service Registry Number
CCR	Coal Combustion Residuals
CCR Parameters	Constituents listed in Appendices III and IV of Title 40, Code of Federal Regulations, Part 257 and five inorganic constituents included in Appendix I of Tennessee Rule 0400-11-01-.04
CCR Rule	Title 40, Code of Federal Regulations, Part 257
CFR	Code of Federal Regulations
EAR	Environmental Assessment Report
EI	Environmental Investigation
GSLs	Groundwater Screening Levels
KIF Plant	Kingston Fossil Plant
µg/L	Micrograms Per Liter
NA	Not Available
%	Percent
Stantec	Stantec Consulting Services Inc.
TDEC	Tennessee Department of Environment and Conservation
TDS	Total Dissolved Solids
TVA	Tennessee Valley Authority
Unified Guidance	Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities: Unified Guidance
USEPA	United States Environmental Protection Agency



## APPENDIX E.3 - STATISTICAL ANALYSIS OF GROUNDWATER ANALYTICAL RESULTS

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### 1.0 INTRODUCTION

Stantec Consulting Services Inc. (Stantec) prepared this appendix on behalf of the Tennessee Valley Authority (TVA) to summarize the statistical analyses performed on groundwater quality data to support evaluations conducted for the Environmental Assessment Report (EAR) at the Kingston Fossil Plant (KIF Plant) located in Harriman, Tennessee. These statistical analyses include an evaluation of groundwater quality data collected at the KIF Plant for the Tennessee Department of Environment and Conservation (TDEC) Order Environmental Investigation (EI), in compliance with the Title 40, Code of Federal Regulations (CFR) Part 257 (Coal Combustion Residuals [CCR Rule]) monitoring program, and the TDEC permitted landfill groundwater monitoring program. The statistical analysis in this appendix focused on the parameters listed in Appendices III and IV of Title 40 CFR 257 and five additional inorganic constituents included in Appendix I of Tennessee Rule 0400-11-01-.04 (CCR Parameters) (see Table E.3-1). The wells included in this statistical analysis are listed in Table E.3-2.

The dataset compiled for statistical analysis includes available analytical data for groundwater samples collected between June 2009 and December 2022, although the specific start date and frequency of sampling may vary between wells based on date of well installation and the applicable monitoring program. This time period was selected because it includes the data that met the data quality objectives of the EI. The complete groundwater quality results for the dataset compiled for statistical analysis are reported in Appendix H.1.



## APPENDIX E.3 - STATISTICAL ANALYSIS OF GROUNDWATER ANALYTICAL RESULTS

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**Table E.3-1 – CCR Parameters Evaluated in Statistical Analysis**

Parameter	CASRN
<b>CCR Rule Appendix III Parameters</b>	
Boron	7440-42-8
Calcium	7440-70-2
Chloride	16887-00-6
Fluoride <sup>1</sup> (also Appendix IV)	16984-48-8
pH	NA
Sulfate	14808-79-8
TDS	NA
<b>CCR Rule Appendix IV Parameters</b>	
Antimony	7440-36-0
Arsenic	7440-38-2
Barium	7440-39-3
Beryllium	7440-41-7
Cadmium	7440-43-9
Chromium	7440-47-3
Cobalt	7440-48-4
Lead	7439-92-1
Lithium	7439-93-2
Mercury	7439-97-6
Molybdenum	7439-98-7
Radium-226+228	13982-63-3/ 15262-20-1
Selenium	7782-49-2
Thallium	7440-28-0
<b>Additional TDEC Appendix I Parameters</b>	
Copper	7440-50-8
Nickel	7440-02-0
Silver	7440-22-4
Vanadium	7440-62-2
Zinc	7440-66-6

**Notes:** CASRN - Chemical Abstracts Service Registry Number; CCR – Coal Combustion Residuals; NA - Not available; TDS - Total dissolved solids

<sup>1</sup>Fluoride is both a CCR Rule Appendix III and CCR Rule Appendix IV constituent. In this table and in the results figures and tables for this report, fluoride has been grouped with the Appendix III constituents only to avoid duplication.



**APPENDIX E.3 - STATISTICAL ANALYSIS OF GROUNDWATER ANALYTICAL RESULTS**

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**Table E.3-2 - Groundwater Monitoring Wells and Parameters Included in Statistical Analysis**

Well Location	Well	Program			Parameters Included in Statistical Analysis		
		El Wells	TDEC Permitted Landfill Wells	CCR Rule Wells	CCR Rule Appendix III	CCR Rule Appendix IV	TDEC Appendix I
Background	AD-1	-	X	X	X	X	X
	GW-2	X	-	-	X	X	X
Stilling Pond	6AR	-	X	X	X	X	X
	KIF-103	X	-	X	X	X	X
	KIF-104	X	-	X	X	X	X
Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area	AD-2	-	X	X	X	X	X
	AD-3	-	X	X	X	X	X
	KIF-105	X	-	X	X	X	X
	KIF-106	X	-	X	X	X	X
	KIF-109	-	-	X	X	X	X

**Notes**

For each well, the program to which the well belongs as well as the parameters evaluated in this statistical analysis are identified with an 'X' and highlighted gray. Programs or parameters that are not applicable to that well are indicated with a dash (-).



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## 2.0 METHODS

### 2.1 EXPLORATORY DATA ANALYSIS

The initial step of statistical analysis was the exploratory data analysis. The process of the exploratory data analysis utilizes simple summary statistics (e.g., mean, median, standard deviation and percentiles) and graphical representations to identify important characteristics of an analytical dataset, such as the center of the data (i.e., mean, median), variation, distribution, patterns, presence of outliers and randomness.

Summary statistics were calculated for each well-constituent pair. These summary statistics include information such as total number of available samples, frequency of detection, and maximum detected values and detected concentrations for each well-constituent pair. Exploratory data plots for each well-constituent pair (i.e., box plots and time series plots) were also constructed to support a visual review of the data and identify potential outliers.

Outliers are data points that are abnormally high or low as compared to other measurements and may represent anomalous data or data errors. Outliers may also represent natural variation of concentrations in environmental systems. Therefore, where potential outliers were visually identified in box plots or time-series plots, secondary statistical screening was completed using Tukey's procedure to identify extreme outliers (Tukey 1977) followed by statistical testing for outliers (Dixon or Rosner's test,  $\alpha=0.05$ ). Following confirmation of the outliers as statistically significant, a desktop evaluation was conducted to verify that the data points were not errors (e.g., laboratory or transcriptional error). Field forms, data validation reports, and other variables in the dataset that could influence analytical results were also evaluated. If a verifiable error was discovered, the outlier was removed and, if possible, replaced with a corrected value.

In the absence of a verifiable error, additional lines of evidence were reviewed to determine final outlier disposition (e.g., frequency of detection, spatial and temporal variability). If an outlier was identified as suitable for removal from further statistical analysis, a clear and defensible rationale based on multiple lines of evidence was provided. In addition, values that were identified as outliers and removed from further evaluation in the present statistical analysis were retained in the historical database and will be reevaluated for inclusion or exclusion in future statistical analyses of this dataset.

### 2.2 COMPARISON OF GROUNDWATER QUALITY DATA TO GROUNDWATER SCREENING LEVELS

The United States Environmental Protection Agency (USEPA) document "*Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities: Unified Guidance*" (USEPA 2009; hereafter referred to as the Unified Guidance) describes statistical methods for comparing groundwater concentrations to fixed standards such as the TDEC-approved groundwater screening levels (GSLs) identified in Appendix A.2. In the Unified Guidance, a confidence interval approach is recommended for comparing groundwater monitoring data to a fixed numerical limit. If the underlying population is stable (i.e., no trend is present), then the Unified Guidance indicates that comparison to a fixed standard can be made based on a



## APPENDIX E.3 - STATISTICAL ANALYSIS OF GROUNDWATER ANALYTICAL RESULTS

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confidence interval around the mean. However, the Unified Guidance indicates that “*where the data exhibit a trend over time the interval will incorporate not only the natural variability in the underlying population, but also additional variation induced by the trend itself. The net result is a confidence interval that can be much wider than expected for a given confidence level and sample size (n).*” Therefore, in the presence of a statistically significant trend, the Unified Guidance recommends constructing a confidence band around a trend line, where the comparison is made to the fixed standard based on the confidence band as of the most recent evaluated sampling event, rather than a static confidence interval around the mean.

For the groundwater data reviewed herein, these approaches were applied to identify well-constituent pairs where the available data indicate a statistically significant concentration above or equal to the GSL for constituents other than pH, or statistically significant values outside the GSL range for pH. For this dataset, the null hypothesis was that the groundwater concentrations were less than the GSL for constituents other than pH and that levels were within the GSL range for pH. In accordance with the methods described in the Unified Guidance, constituent concentrations were determined to represent a statistically significant concentration above or equal to a GSL for constituents other than pH, only when there were sufficient data to support statistical confidence band or interval evaluation and the applicable lower confidence band or interval was greater than or equal to the GSL as of the most recent sampling event included in the statistical analysis. For pH, which has both an upper and lower GSL, a statistical difference was identified if there were sufficient data to support statistical analysis, and either the applicable lower confidence band or interval was greater than or equal to the upper GSL or the applicable upper confidence band or interval was less than or equal to the lower GSL as of the most recent sampling event included in the statistical analysis. Whether comparison should be made using a confidence band or confidence interval was determined for each well-constituent pair based on the results of a linear regression trend analysis for each well-constituent pair. If no significant linear trend was detected ( $p \geq 0.05$  for the regression slope), comparison to the GSLs was completed based on a static confidence interval around the mean. If a statistically significant linear trend was present ( $p < 0.05$  for the regression slope), comparison to the GSLs was completed based on a confidence band around the linear regression trend line at the most recent evaluated sampling event. In both cases, the confidence band or intervals were constructed with 98 percent (%) confidence, which correspond to a lower confidence limit with 99% confidence.

Additional details regarding the methods used to compare groundwater quality data to groundwater screening levels are provided below. As described below, the approach adopted for this comparison was dependent on the number of samples available and the proportion of detected concentrations for each well-constituent pair.

### 2.2.1 Linear Regression Trend Analysis and Confidence Interval/ Confidence Band Evaluation

For well-constituent pairs with five or more samples and at least four detected values, groundwater quality data were compared to GSLs using a linear regression trend analysis and confidence interval/ confidence band evaluation summarized in **Figure E.3-1** (below) and described in more detail in this section.





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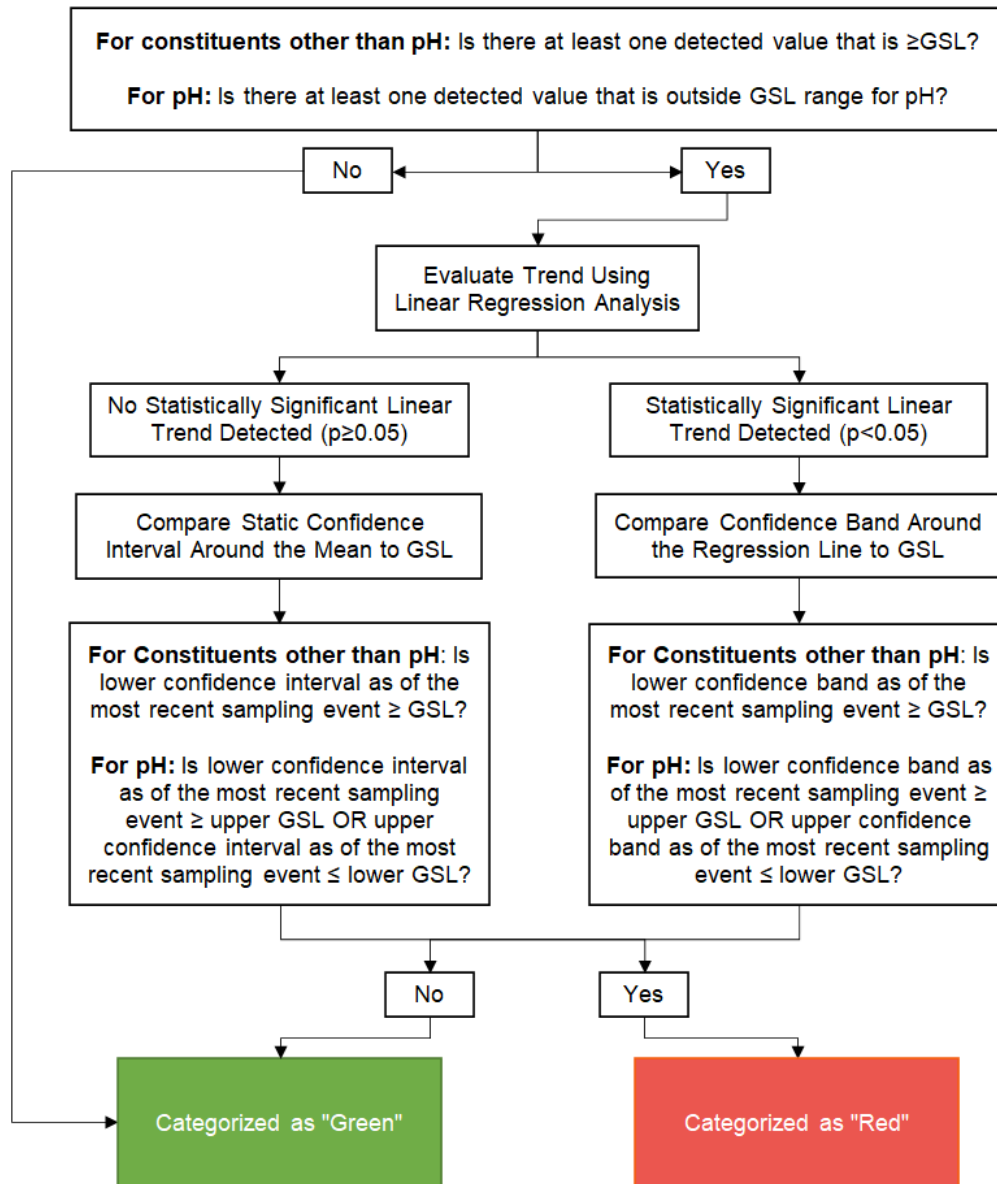
First, data were screened to identify if there were reported individual values greater than or equal to the GSL for constituents other than pH or outside the GSL range for pH. In the absence of such a value, well-constituent pairs were classified as 'Green'. If such a value was observed, then linear regression analysis was completed to identify well-constituent pairs with a statistically significant linear trend ( $p < 0.05$ ) over the analyzed time period. As noted above, if no statistically significant linear trend was detected ( $p \geq 0.05$ ), a static confidence interval around the mean was used for comparison to the GSLs. If a statistically significant linear trend was present ( $p < 0.05$ ), a confidence band around the linear regression trend line at the most recent evaluated sampling event was used for comparison to the GSLs. In both cases, 98% confidence intervals were constructed, which correspond to a lower confidence limit with 99% confidence. Non-detect values were conservatively represented at the reported detection limit.

The resulting confidence intervals and confidence bands were then compared to the GSL for the analyzed well-constituent pairs as of the most recent sampling event included in the statistical analysis. For constituents other than pH, well-constituent pairs were classified as 'Red', indicating a statistically significant concentration above or equal to the GSL at a 99% confidence level only if the applicable lower confidence band or interval was greater than or equal to the GSL as of the most recent sampling event included in the statistical analysis (see examples in **Figure E.3-2** below). For pH, well-constituent pairs were classified as 'Red', indicating a statistically significant difference from the GSL range at a 99% confidence level, if the applicable lower confidence band or interval was greater than or equal to the upper GSL or if the applicable upper confidence interval was less than or equal to the lower GSL as of the most recent sampling event included in the statistical analysis (see examples in **Figure E.3-3** below). The remaining well-constituent pairs with five or more samples and at least four detected values that were not classified as 'Red' using the linear regression trend analysis and confidence interval/ confidence band evaluation described above were classified as 'Green'. The 'Green' category indicates that as of the most recent sampling event included in the analysis, constituent levels were not statistically significantly greater than or equal to the GSL (for constituents other than pH) and not statistically greater than or equal to the upper GSL or less than or equal to the lower GSL for pH at a 99% confidence level.



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Note: GSL = TDEC-approved Groundwater Screening Level (see Appendix A.2)

Figure E.3-1 – Flow chart summarizing linear regression trend analysis and confidence interval/ confidence band evaluation



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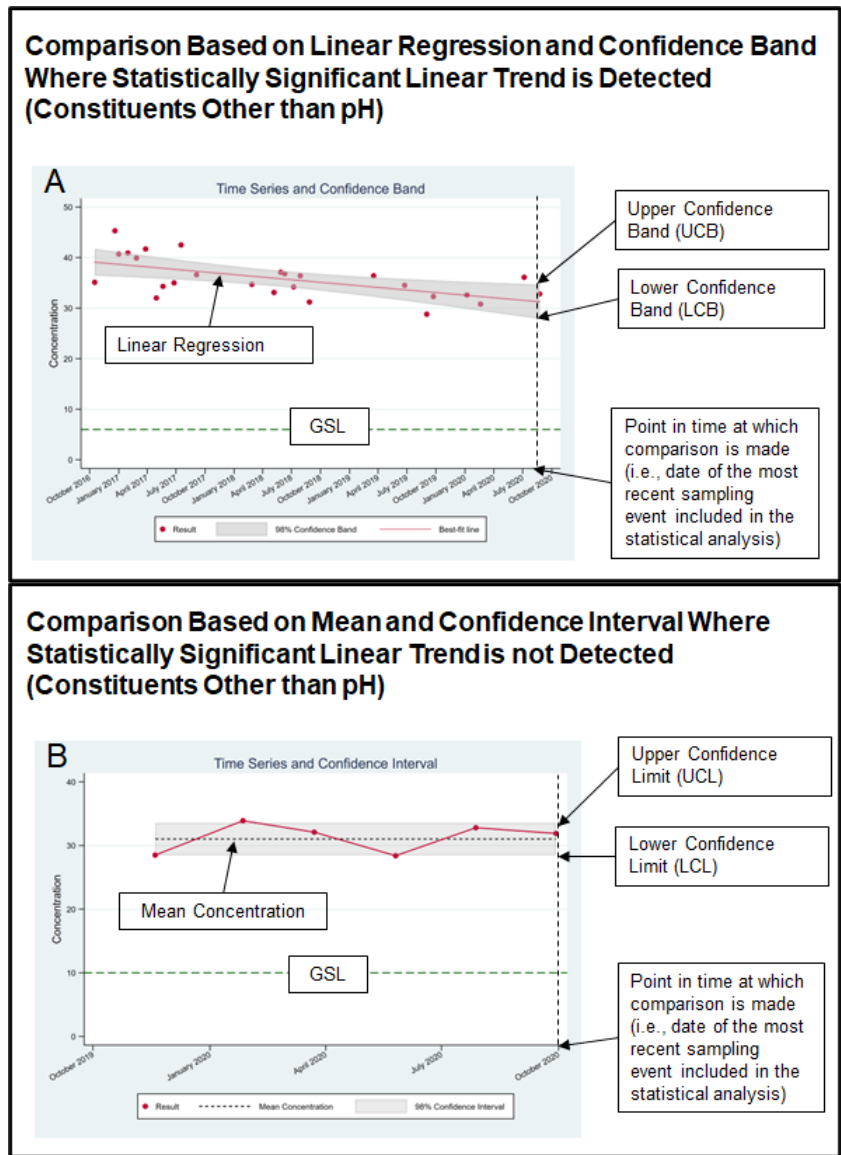
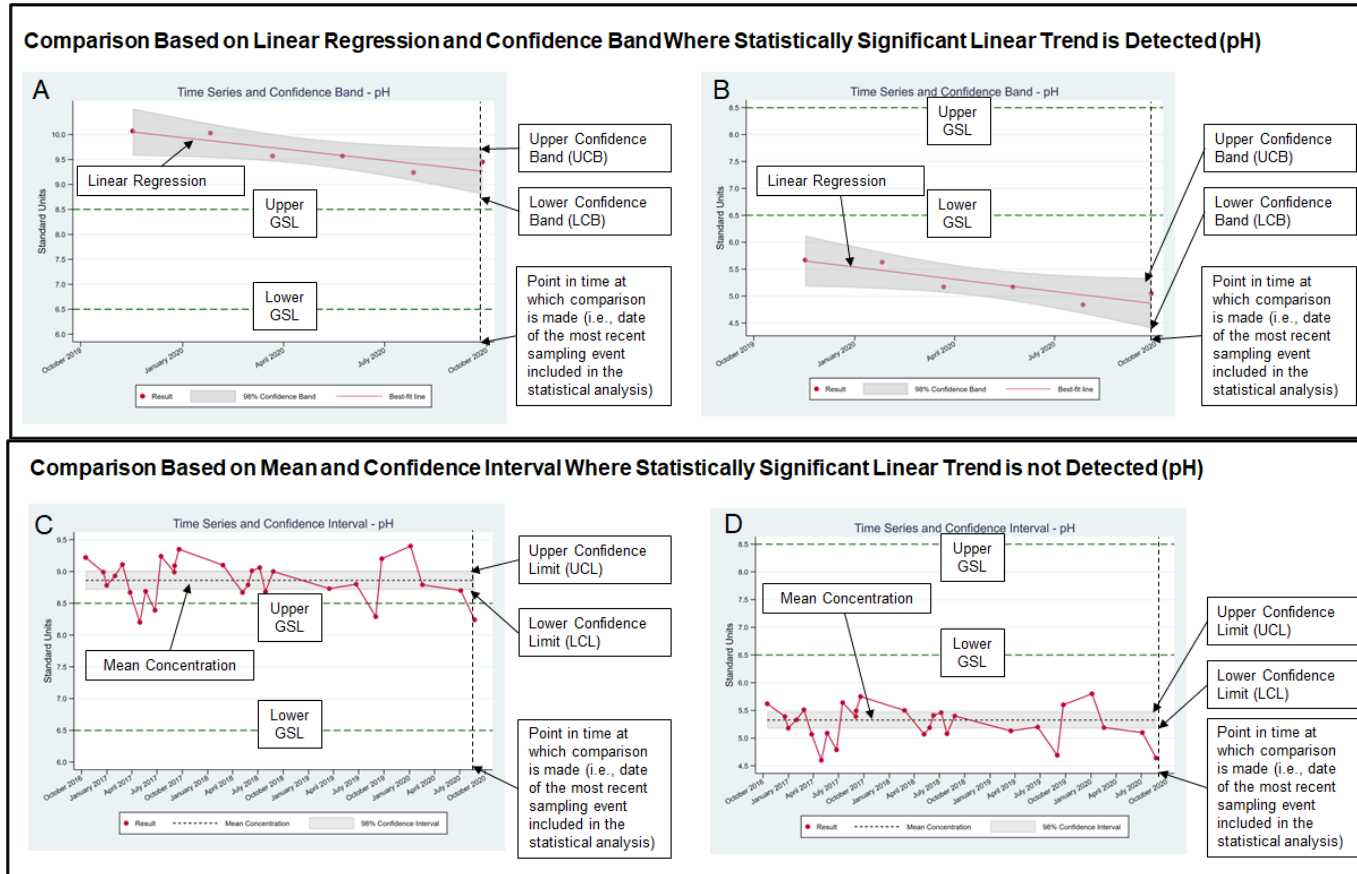


Figure E.3-2 – Examples of well-constituent pairs classified as ‘Red’ for constituents other than pH (A) in the presence of a statistically significant linear trend ( $p < 0.05$ ) and (B) in the absence of a statistically significant linear trend ( $p \geq 0.05$ )



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**Figure E.3-3 - Examples of well-constituent pairs classified as ‘Red’ for pH (A, B) in the presence of a statistically significant linear trend ( $p < 0.05$ ) and (C, D) in the absence of a statistically significant linear trend ( $p \geq 0.05$ )**



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### 2.2.2 Evaluation for Well-Constituent Pairs Using Point-by-Point Method

Well-constituent pairs with less than five samples in the dataset or less than four detected results were not well suited to a linear regression trend analysis and confidence band or interval evaluation. Therefore, an alternate evaluation was completed for these well-constituent pairs based on a point-by-point comparison of the reported concentration for each sample to the applicable GSL. In this approach, well-constituent pairs were classified as 'Green\*', if there were no detected values that were greater than or equal to the GSL for constituents other than pH, or there were no detected values outside the GSL range for pH. However, if there was a limited dataset (i.e., less than five samples in the dataset or less than four detected results), and at least one value was greater than or equal to the GSL for constituents other than pH or there were detected values outside the GSL range for pH, this triggered further data review and an alternate evaluation of that well-constituent pair. For these well-constituent pairs, the available data were reviewed and alternate statistical approaches were considered (e.g., completing a statistical evaluation resulting in a 'Red' or 'Green' classification as described in Section 2.2.1 using the limited dataset). If such an alternate evaluation was required, then this was clearly identified and additional rationale provided in the applicable sub-sections of Section 3.0.

## 3.0 RESULTS AND DISCUSSION

### 3.1 EXPLORATORY DATA ANALYSIS

Summary statistics for each evaluated well-constituent pair are provided in Attachment E.3-A, with results grouped by well and sorted by constituent type. Exploratory data analysis plots for each well-constituent pair (i.e., box plots and time-series plots) are provided in Attachments E.3-B and E.3-C. These plots were reviewed to identify potential outliers and provide a qualitative evaluation of data distribution. The plots also provide a preliminary comparison of the results from individual sampling events to the applicable GSLs. Based on this evaluation, five outliers that were sufficiently abnormal to justify their removal from further statistical analysis were identified. These outliers and their rationale for removal are summarized below:

- For total dissolved solids at well AD-1, a value of 1,500,000 micrograms per Liter ( $\mu\text{g/L}$ ) was reported for a sample collected in June 2016. In comparison, the values of the 66 additional samples for AD-1 collected before or after that event between June 2009 and December 2022 ranged from 196,000 to 376,000  $\mu\text{g/L}$  (i.e., approximately 4 to 8 times lower than the identified outlier). Furthermore, the increased total dissolved solids result from the June 2016 sampling event was not supported by a concurrent increase in specific conductance (417  $\mu\text{S/cm}$  in June 2016, where subsequent events ranged from 361 to 590  $\mu\text{S/cm}$ , with the exception of one sampling event in February 2019, which had a specific conductance value of 7  $\mu\text{S/cm}$ ). Given that no similarly high TDS concentrations have been observed in 13 years of sampling at this well, the TDS concentration of 1,500,000  $\mu\text{g/L}$  observed for a sample collected at well AD-1 in June 2016 was excluded from additional statistical analysis.



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- For total dissolved solids at well GW-2, a value of 4,950,000 µg/L was reported for a sample collected in December 2019. In comparison, the values of the remaining five samples for GW-2 collected both before and after that event between June 2019 and April 2020 ranged from 10,000 to 70,000 µg/L (i.e., approximately 70 to 500 times lower than the identified outlier). Furthermore, the increased total dissolved solids result from the December 2019 sampling event was not supported by a concurrent increase in specific conductance (95.4 µS/cm in December 2019, where previous and subsequent events ranged from 58-141 µS/cm).
- For zinc at AD-2 and AD-3, concentrations of 12,500 µg/L and 6,570 µg/L, respectively, were observed for samples collected in September 2018. In comparison, the values of the 136 additional samples for AD-2 and AD-3 collected before or after that event between June 2009 and November 2022 ranged from 1.83 µg/L to <50 µg/L, with the next highest detected concentration equal to 35.3 µg/L (i.e., at least 190 times lower than the identified outliers). Furthermore, the increased zinc results from the September 2018 sampling events at AD-2 and AD-3 were not correlated with an increase in sample turbidity (turbidity at AD-2 was 5.11 NTU in September 2018 and ranged from 0.78 – 60.8 NTU for other sampling events and turbidity at AD-3 was 3.15 NTU in September 2018 and ranged from 0.21 – 4.21 NTU for other sampling events). Given that no similarly high zinc concentrations have been observed in 13 years of sampling at these wells, the zinc concentrations of 12,500 µg/L and 6,570 µg/L from AD-2 and AD-3 from September 2018 were excluded from additional statistical analysis.
- For sulfate at 6AR, a concentration of 18,900 µg/L was reported for a sample collected in September 2009. In comparison, sulfate concentrations for the additional 55 samples collected since that sampling event between 2010 and 2022 were more than ten times higher than the identified outlier, with the next highest reported sulfate concentration having a value of 212,000 µg/L in December 2011. Because no similarly low sulfate concentrations have been observed at 6AR in 13 subsequent years of sampling, the sulfate concentration of 18,900 µg/L for 6AR from September 2009 was excluded from additional statistical analysis.

As such, statistical analysis for total dissolved solids at AD-1 and GW-2, for zinc at AD-2 and AD-3, and for sulfate at 6AR was carried out with the identified outliers removed. There were no other potential outliers removed from further statistical analysis.

### 3.2 COMPARISON OF GROUNDWATER QUALITY DATA TO APPROVED GROUNDWATER SCREENING LEVELS

A summary of the results comparing groundwater quality data to GSLs is provided in Table E.3-3. The confidence bands or confidence intervals generated to support this comparison are provided in Attachment E.3-D, and the statistical results of these regression analyses are reported in Attachment E.3-E. Further discussion is provided below.

For most well-constituent pairs that were evaluated by linear regression, no statistically significant trend over time was observed based on the linear regression analyses. Comparison to the GSLs for these well-constituent pairs was completed based on a static confidence interval around the mean as shown in



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Attachment E.3-D. However, there were three well-constituent pairs where a statistically significant decreasing trend was detected and fifteen well-constituent pairs where a statistically significant increasing trend was detected, as indicated in Attachment E.3-E. Comparison to the GSLs for these well-constituent pairs was completed based on a confidence band around the trend line as shown in Attachment E.3-D.



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**Table E.3-3 – Summary of Statistically Significant Concentrations/Values**

Parameter	Background		Stilling Pond			Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area				
	AD-1	GW-2	6AR	KIF-103	KIF-104	AD-2	AD-3	KIF-105	KIF-106	KIF-109
<b>CCR Rule Appendix III Parameters</b>										
Boron	Green	Green*	Green	Green	Green	Green	Green	Green	Green	Green
Chloride	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
Fluoride <sup>1</sup> (also Appendix IV)	Green	Green*	Green	Green	Green	Green	Green	Green	Green	Green
pH (field)	Green	Red	Red	Red	Red	Red	Green	Red	Green	Red
Sulfate	Green	Green	Red	Green	Red	Red	Red	Red	Red	Green
Total Dissolved Solids	Green	Green	Green	Green	Red	Red	Red	Red	Red	Green
<b>CCR Rule Appendix IV Parameters</b>										
Antimony	Green*	Green*	Green	Green*	Green	Green*	Green*	Green*	Green*	Green*
Arsenic	Green	Green*	Green	Green	Green	Green	Green	Green	Green	Green
Barium	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
Beryllium	Green*	Green*	Green	Green*	Green*	Green	Green*	Green	Green*	Green*
Cadmium	Green*	Green*	Green	Green*	Green*	Green*	Green*	Green	Green*	Green*
Chromium	Green	Green*	Green	Green*	Green*	Green	Green	Green*	Green*	Green*
Cobalt	Green	Green*	Red	Red	Red	Red	Green	Red	Green	Green
Lead	Green*	Green*	Green	Green*	Green*	Green	Green*	Green	Green*	Green*
Lithium	Green	Green*	Green*	Green*	Green	Green	Green	Green	Green	Green
Mercury	Green*	Green*	Green*	Green*	Green*	Green*	Green*	Green*	Green*	Green*
Molybdenum	Green	Green*	Green*	Green*	Green	Green	Green	Green*	Green	Green*
Radium-226+228	Green	Green*	Green	Green	Green	Green	Green	Green	Green*	Green
Selenium	Green*	Green*	Green*	Green*	Green*	Green	Green*	Green*	Green*	Green*
Thallium	Green	Green*	Green	Green*	Green*	Green	Green	Green	Green*	Green*
<b>Additional TDEC Appendix I Parameters</b>										
Copper	Green	Green*	Green*	Green*	Green	Green*	Green	Green*	Green*	Green*
Nickel	Green*	Green*	Green	Green	Green	Green	Green	Green	Green	Green
Silver	Green*	Green*	Green*	Green*	Green*	Green*	Green*	Green*	Green*	Green*
Vanadium	Green*	Green*	Green*	Green*	Green	Green*	Green*	Green*	Green*	Green*
Zinc	Green*	Green*	Green	Green	Green	Green	Green	Green	Green	Green

**Notes:**

Green - No statistically significant concentration greater than or equal to the GSL for constituents other than pH and no statistically significant difference outside the GSL range for pH.

Green\* - Limited dataset (sample size <5 or <4 detected values), but none of the available results are greater than or equal to the GSL or outside the GSL range for pH.

Red - Statistically significant concentration greater than or equal to the GSL for constituents other than pH or a statistically significant difference outside the GSL range for pH.

Bold colors are used to represent CCR Rule Appendix IV Parameter and TDEC Appendix I Parameter results; subdued colors represent CCR Rule Appendix III Parameter results.

<sup>1</sup>Fluoride is both a CCR Rule Appendix III and CCR Rule Appendix IV constituent. In this table, fluoride has been grouped only with the Appendix III constituents to avoid duplication of results.





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In total, 16 well-constituent pairs were identified with CCR Parameters at statistically significant concentrations greater than or equal to the GSL for constituents other than pH. There were also seven wells where statistically significant difference from the GSL range for pH were observed. The well-constituent pairs with statistically significant concentrations greater than or equal to the GSL or outside the GSL range for pH (i.e., categorized as 'Red' in Table E.3-3) are summarized in Table E.3-4.

**Table E.3-4 – Summary of Statistically Significant Concentrations Greater than the GSL**

Well	Appendix III			Appendix IV
	pH (field)	Sulfate	Total Dissolved Solids	Cobalt
GW-2	X	-	-	-
6AR	X	X	-	X
KIF-103	X	-	-	X
KIF-104	X	X	X	X
AD-2	X	X	X	X
AD-3	-	X	X	-
KIF-105	X	X	X	X
KIF-106	-	X	X	-
KIF-109	X	-	-	-

**Notes**

Well-constituent pairs with CCR Parameters at statistically significant concentrations greater than or equal to the GSL for constituents other than pH or outside the GSL range for pH are identified with an 'X' and highlighted gray. Dash (-) indicates the absence of a statistically significant concentration greater than or equal to the GSL or outside the GSL range for pH for that well-constituent pair.



## APPENDIX E.3 - STATISTICAL ANALYSIS OF GROUNDWATER ANALYTICAL RESULTS

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### 4.0 REFERENCES

Tukey, J.W. (1977). *Exploratory Data Analysis*. Reading, Massachusetts: Addison-Wesley. 1977.

United States Environmental Protection Agency (USEPA). (2009). *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities: Unified Guidance*. EPA 530/R-09-007, 884 pp.



**ATTACHMENT E.3-A  
SUMMARY STATISTICS**

Summary Statistics - Groundwater Investigation									
Kingston Fossil Plant - Harriman, Tennessee									
Parameter	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
				Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
<b>Well: AD-1</b>									
<b>CCR Rule Appendix III Parameters</b>									
Boron	50/70	(0.7 - 1,000)	28.6%	106	227	129.2	37.11	136.5	1,000
Calcium	70/70	--	0.0%	2,790	18,100	7,084	3,583	5,960	13,855
Chloride	59/69	(1,550 - 5,100)	14.5%	1,190	6,730	1,660	664.8	1,590	2,654
Fluoride <sup>1</sup> (also Appendix IV)	66/71	(100 - 257)	7.0%	28.4	707	244.5	84.56	244	325.5
pH	43/43	--	0.0%	6.81	9.15	8.494	0.406	8.6	8.869
Sulfate	68/69	(1,000 - 1,000)	1.4%	19,000	83,400	25,896	8,618	24,400	30,840
TDS	68/68	--	0.0%	196,000	376,000	255,544	21,868	253,000	289,200
<b>CCR Rule Appendix IV Parameters</b>									
Antimony	3/72	(0.303 - 2)	95.8%	0.361	0.695	0.317	0.0639	0.378	2
Arsenic	50/72	(0.0743 - 2)	30.6%	0.36	2.46	0.573	0.284	0.586	2
Barium	71/72	(200 - 200)	1.4%	43.9	115	70.59	18.93	66.9	109.7
Beryllium	0/72	(0.057 - 2)	100.0%	--	--	--	--	0.33	2
Cadmium	0/72	(0.125 - 1)	100.0%	--	--	--	--	0.33	1
Chromium	15/72	(0.09 - 3.31)	79.2%	0.331	2.9	0.341	0.419	1.53	2.078
Cobalt	4/72	(0.0246 - 2)	94.4%	0.093	0.707	0.0525	0.0966	0.33	2
Lead	3/72	(0.0603 - 2)	95.8%	0.303	1.74	0.104	0.225	0.33	2
Lithium	31/44	(0.794 - 50)	29.5%	15.2	25.5	18.18	5.555	20.65	50
Mercury	0/72	(0.0392 - 1.5)	100.0%	--	--	--	--	0.15	0.2
Molybdenum	26/70	(0.474 - 5)	62.9%	0.34	2.72	0.518	0.3	0.61	2
Radium-226+228	10/48	(0 - 2)	79.2%	0.182	1.56	0.172	0.345	0.326	1.2
Selenium	0/72	(0.316 - 5)	100.0%	--	--	--	--	1.162	2.62
Thallium	4/72	(0.0239 - 2)	94.4%	0.322	0.5	0.0622	0.115	0.472	2
<b>TDEC Appendix I Parameters</b>									
Copper	22/72	(0.33 - 5)	69.4%	0.36	9.54	0.746	1.177	0.649	2.339
Nickel	10/72	(0.243 - 5)	86.1%	0.33	1.49	0.305	0.184	0.336	2
Silver	0/72	(0.0878 - 2)	100.0%	--	--	--	--	0.33	2
Vanadium	4/72	(0.1 - 5.22)	94.4%	0.59	0.919	0.375	0.298	1	4
Zinc	4/72	(1.83 - 50)	94.4%	3.58	9.18	2.23	1.282	8.3	25
<b>Well: GW-2</b>									
<b>CCR Rule Appendix III Parameters</b>									
Boron	3/6	(70.6 - 273)	50.0%	77.3	367	142.2	107.1	157	343.5
Calcium	6/6	--	0.0%	5,160	15,900	10,222	4,432	10,300	15,500
Chloride	5/6	(1,840 - 1,840)	16.7%	1,240	1,610	1,454	130.9	1,505	1,783
Fluoride <sup>1</sup> (also Appendix IV)	3/6	(41.6 - 71.5)	50.0%	36.4	68	46.67	12.36	52.55	70.63
pH	6/6	--	0.0%	5.28	6.11	5.84	0.308	5.93	6.1
Sulfate	6/6	--	0.0%	12,300	35,200	22,050	9,000	20,350	33,900
Total Dissolved Solids <sup>2</sup>	4/5	(10,000 - 10,000)	20.0%	38,000	70,000	48,400	22,033	60,000	68,800
<b>CCR Rule Appendix IV Parameters</b>									
Antimony	0/6	(0.378 - 1.07)	100.0%	--	--	--	--	0.378	0.897
Arsenic	2/6	(0.313 - 0.574)	66.7%	0.338	0.377	0.331	0.025	0.331	0.525
Barium	6/6	--	0.0%	19.9	49.3	33.45	12.19	32.8	48.3
Beryllium	1/6	(0.182 - 0.182)	83.3%	0.267	0.267	0.196	0.0317	0.182	0.246
Cadmium	0/6	(0.125 - 0.217)	100.0%	--	--	--	--	0.125	0.217
Chromium	0/6	(1.53 - 4.19)	100.0%	--	--	--	--	2.04	4.165
Cobalt	2/6	(0.075 - 0.134)	66.7%	0.076	0.082	0.077	0.00292	0.079	0.134
Lead	0/6	(0.128 - 0.128)	100.0%	--	--	--	--	0.128	0.128
Lithium	1/6	(3.39 - 3.39)	83.3%	3.65	3.65	3.433	0.0969	3.39	3.585
Mercury	0/6	(0.101 - 0.13)	100.0%	--	--	--	--	0.101	0.123
Molybdenum	0/6	(0.61 - 0.61)	100.0%	--	--	--	--	0.61	0.61
Radium-226+228	0/6	(0.00721 - 0.736)	100.0%	--	--	--	--	0.449	0.702
Selenium	0/6	(1.51 - 2.62)	100.0%	--	--	--	--	1.51	2.343
Thallium	0/6	(0.128 - 0.41)	100.0%	--	--	--	--	0.148	0.345
<b>TDEC Appendix I Parameters</b>									
Copper	0/6	(0.627 - 0.775)	100.0%	--	--	--	--	0.627	0.738
Nickel	2/6	(0.312 - 0.336)	66.7%	0.377	0.885	0.418	0.21	0.336	0.758
Silver	0/6	(0.121 - 0.177)	100.0%	--	--	--	--	0.177	0.177
Vanadium	1/6	(0.991 - 2.34)	83.3%	1.66	1.66	1.125	0.268	1.201	2.17
Zinc	2/6	(3.22 - 3.22)	66.7%	3.24	56.7	12.14	19.93	3.22	43.34

Summary Statistics - Groundwater Investigation									
Kingston Fossil Plant - Harriman, Tennessee									
Parameter	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
				Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
<b>Well: 6AR</b>									
<b>CCR Rule Appendix III Parameters</b>									
Boron	45/56	(2.49 - 1,000)	19.6%	465	723	585	104	618	1,000
Calcium	56/56	--	0.0%	41,000	66,600	54,368	6,363	54,700	65,100
Chloride	56/56	--	0.0%	4,020	10,100	6,918	1,347	7,275	8,610
Fluoride <sup>1</sup> (also Appendix IV)	26/57	(26 - 500)	54.4%	26.8	243	50.37	41.24	66	199.8
pH	41/41	--	0.0%	4.52	5.84	5.028	0.306	5.02	5.54
Sulfate	55/55	--	0.0%	212,000	327,000	263,345	28,054	267,000	306,800
TDS	56/56	--	0.0%	328,000	550,000	434,161	48,261	445,500	502,750
<b>CCR Rule Appendix IV Parameters</b>									
Antimony	8/57	(0.303 - 2)	86.0%	0.432	2.93	0.477	0.552	0.378	2.04
Arsenic	30/57	(0.0743 - 2)	47.4%	0.338	3.24	0.499	0.491	0.549	2
Barium	55/57	(50 - 200)	3.5%	20.2	43.2	24.8	4.51	22.9	36.4
Beryllium	49/62	(0.064 - 2)	21.0%	0.195	0.977	0.619	0.177	0.695	2
Cadmium	62/62	--	0.0%	0.147	35.7	2.99	4.55	2.25	5.9
Chromium	5/57	(0.09 - 2.86)	91.2%	0.34	2.12	0.249	0.378	1.53	2
Cobalt	62/62	--	0.0%	84.1	165	117.9	17.23	118	140
Lead	14/57	(0.0603 - 2)	75.4%	0.131	0.427	0.127	0.0863	0.226	2
Lithium	2/43	(0.794 - 50)	95.3%	0.855	0.867	0.813	0.0304	3.39	50
Mercury	0/57	(0.0392 - 0.2)	100.0%	--	--	--	--	0.13	0.2
Molybdenum	0/56	(0.33 - 5)	100.0%	--	--	--	--	0.61	2
Radium-226+228	10/46	(0 - 2)	78.3%	0.174	2.304	0.206	0.437	0.321	1.212
Selenium	2/57	(0.316 - 5)	96.5%	0.401	1.32	0.368	0.209	1.51	2.62
Thallium	6/57	(0.0239 - 2)	89.5%	0.073	0.724	0.101	0.148	0.472	2
<b>TDEC Appendix I Parameters</b>									
Copper	7/57	(0.33 - 4.12)	87.7%	0.34	2.75	0.421	0.333	0.627	2
Nickel	62/62	--	0.0%	30.4	65.8	45.52	6.678	44.1	54.9
Silver	1/57	(0.0878 - 2)	98.2%	0.315	0.315	0.0949	0.0395	0.223	2
Vanadium	4/57	(0.1 - 4)	93.0%	0.973	2.55	0.252	0.447	0.991	4
Zinc	57/57	--	0.0%	25.5	73.9	41.28	9.192	39.6	55.82
<b>Well: KIF-103</b>									
<b>CCR Rule Appendix III Parameters</b>									
Boron	27/27	--	0.0%	742	1,140	941.6	91.47	933	1,071
Calcium	27/27	--	0.0%	25,000	56,900	36,007	7,884	34,700	50,930
Chloride	27/27	--	0.0%	4,930	9,350	6,349	946.3	6,400	7,395
Fluoride <sup>1</sup> (also Appendix IV)	16/27	(26.3 - 154)	40.7%	27.7	71.6	39.62	12.23	43.4	92.88
pH	26/26	--	0.0%	5.55	6.31	5.962	0.16	5.965	6.165
Sulfate	27/27	--	0.0%	56,600	102,000	82,615	10,823	82,600	98,450
TDS	27/27	--	0.0%	190,000	340,000	259,704	38,013	254,000	323,000
<b>CCR Rule Appendix IV Parameters</b>									
Antimony	1/27	(0.378 - 1.12)	96.3%	0.524	0.524	0.384	0.0281	0.378	0.519
Arsenic	25/27	(1.16 - 3.12)	7.4%	0.441	8.33	2.756	1.646	2.93	4.653
Barium	27/27	--	0.0%	32.9	62.3	43.83	6.356	43.9	54.19
Beryllium	0/27	(0.057 - 0.274)	100.0%	--	--	--	--	0.182	0.274
Cadmium	0/27	(0.125 - 0.217)	100.0%	--	--	--	--	0.125	0.217
Chromium	0/27	(1.32 - 3.16)	100.0%	--	--	--	--	1.53	1.991
Cobalt	27/27	--	0.0%	29.9	71.4	60.05	8.974	62.5	70.17
Lead	2/27	(0.094 - 0.167)	92.6%	0.617	1.12	0.151	0.214	0.128	0.482
Lithium	1/27	(0.831 - 3.39)	96.3%	0.864	0.864	0.839	0.0143	3.14	3.39
Mercury	0/27	(0.101 - 0.13)	100.0%	--	--	--	--	0.101	0.13
Molybdenum	0/27	(0.474 - 2.7)	100.0%	--	--	--	--	0.61	0.61
Radium-226+228	6/27	(0 - 1.082)	77.8%	0.241	1.291	0.164	0.283	0.347	1.038
Selenium	0/27	(0.739 - 2.62)	100.0%	--	--	--	--	1.51	2.62
Thallium	3/27	(0.063 - 0.472)	88.9%	0.16	0.227	0.0816	0.0488	0.148	0.472
<b>TDEC Appendix I Parameters</b>									
Copper	0/27	(0.627 - 11.1)	100.0%	--	--	--	--	0.627	1.252
Nickel	24/27	(2.06 - 4.1)	11.1%	0.86	3.29	2.524	0.557	2.66	3.275
Silver	3/27	(0.121 - 0.223)	88.9%	0.128	0.284	0.132	0.0361	0.177	0.223
Vanadium	0/27	(0.776 - 1.3)	100.0%	--	--	--	--	0.899	1.074
Zinc	18/27	(2.88 - 9.29)	33.3%	3.28	9.13	4.16	1.495	3.85	8.653

Summary Statistics - Groundwater Investigation									
Kingston Fossil Plant - Harriman, Tennessee									
Parameter	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
				Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
<b>Well: KIF-104</b>									
<b>CCR Rule Appendix III Parameters</b>									
Boron	27/27	--	0.0%	780	1,990	1,536	313	1,590	1,881
Calcium	27/27	--	0.0%	133,000	197,000	166,185	16,692	167,000	193,400
Chloride	27/27	--	0.0%	6,420	20,100	10,938	3,248	10,600	18,720
Fluoride <sup>1</sup> (also Appendix IV)	19/27	(64.5 - 134)	29.6%	30.5	218	89.84	46.13	92.8	168.5
pH	25/25	--	0.0%	5.88	6.9	6.186	0.189	6.19	6.4
Sulfate	27/27	--	0.0%	397,000	812,000	552,815	92,690	552,000	705,200
TDS	27/27	--	0.0%	870,000	1,280,000	1,043,185	96,736	1,030,000	1,218,000
<b>CCR Rule Appendix IV Parameters</b>									
Antimony	5/27	(0.378 - 1.13)	81.5%	0.481	1.36	0.456	0.214	0.378	1.127
Arsenic	27/27	--	0.0%	3.59	13.8	8.191	2.676	8.57	11.58
Barium	27/27	--	0.0%	60.2	192	123.5	34.92	119	183.2
Beryllium	2/27	(0.057 - 0.274)	92.6%	0.267	0.427	0.0799	0.0805	0.182	0.274
Cadmium	0/27	(0.125 - 0.217)	100.0%	--	--	--	--	0.125	0.217
Chromium	2/27	(0.754 - 3.25)	92.6%	1.74	2.01	0.858	0.328	1.53	3.219
Cobalt	27/27	--	0.0%	1.08	26.3	12.5	5.197	10.8	23.18
Lead	3/27	(0.094 - 0.167)	88.9%	0.128	0.27	0.107	0.0403	0.128	0.204
Lithium	14/27	(0.831 - 9.35)	48.1%	1.07	23.9	4.08	4.623	3.39	9.035
Mercury	0/27	(0.101 - 0.13)	100.0%	--	--	--	--	0.101	0.13
Molybdenum	21/27	(0.61 - 3.94)	22.2%	0.679	3.83	1.578	1.074	1.04	3.824
Radium-226+228	17/27	(0.124 - 1.931)	37.0%	0.337	1.616	0.716	0.426	0.758	1.603
Selenium	1/27	(0.739 - 2.62)	96.3%	2.13	2.13	0.816	0.319	1.51	2.62
Thallium	0/27	(0.063 - 0.754)	100.0%	--	--	--	--	0.148	0.472
<b>TDEC Appendix I Parameters</b>									
Copper	4/27	(0.627 - 1.3)	85.2%	0.76	1.14	0.68	0.13	0.627	1.14
Nickel	21/27	(0.517 - 4.16)	22.2%	0.446	2.77	1.424	0.7	1.54	2.755
Silver	1/27	(0.121 - 0.49)	96.3%	0.441	0.441	0.133	0.0615	0.177	0.376
Vanadium	5/27	(0.776 - 1.47)	81.5%	0.909	1.19	0.843	0.118	0.991	1.33
Zinc	19/27	(3.22 - 10.1)	29.6%	3.27	10.5	4.586	1.711	4.34	9.899
<b>Well: AD-2</b>									
<b>CCR Rule Appendix III Parameters</b>									
Boron	58/67	(1,000 - 1,000)	13.4%	358	1,360	847	252.1	908	1,291
Calcium	67/67	--	0.0%	25,700	182,000	102,809	47,498	97,300	173,000
Chloride	66/66	--	0.0%	4,910	21,200	10,535	4,076	9,250	18,950
Fluoride <sup>1</sup> (also Appendix IV)	38/68	(64.7 - 130)	44.1%	39.6	162	79.34	29.21	100	137.2
pH	40/40	--	0.0%	5.42	6.27	5.839	0.14	5.84	6.04
Sulfate	66/66	--	0.0%	69,600	534,000	314,456	141,045	351,000	509,000
TDS	67/67	--	0.0%	28,000	878,000	507,582	219,191	567,000	844,300
<b>CCR Rule Appendix IV Parameters</b>									
Antimony	3/69	(0.303 - 2)	95.7%	0.38	0.774	0.316	0.0659	0.378	2
Arsenic	58/69	(0.0743 - 2)	15.9%	0.512	29.7	2.825	3.863	2	9.304
Barium	66/69	(31.8 - 200)	4.3%	22.4	48.6	34.58	6.612	33.5	46.9
Beryllium	23/69	(0.064 - 2)	66.7%	0.124	0.436	0.219	0.0937	0.33	2
Cadmium	0/69	(0.125 - 1)	100.0%	--	--	--	--	0.33	1
Chromium	9/69	(0.09 - 2.3)	87.0%	0.33	4.63	0.385	0.776	1.53	2.26
Cobalt	69/69	--	0.0%	3.72	18.7	10.38	4.12	10.6	17.02
Lead	30/69	(0.0603 - 2)	56.5%	0.208	1.32	0.32	0.225	0.33	2
Lithium	29/43	(0.794 - 50)	32.6%	9.71	15.4	12.02	2.647	13.4	50
Mercury	0/69	(0.0392 - 1.5)	100.0%	--	--	--	--	0.15	0.2
Molybdenum	54/67	(0.33 - 5)	19.4%	0.42	9.76	1.96	1.818	1.57	5.59
Radium-226+228	12/44	(0 - 1.273)	72.7%	0.0839	1.132	0.207	0.331	0.45	1.081
Selenium	5/69	(0.316 - 5)	92.8%	0.401	1.66	0.394	0.24	1.51	2.62
Thallium	11/69	(0.0239 - 2)	84.1%	0.068	0.752	0.132	0.164	0.472	2
<b>TDEC Appendix I Parameters</b>									
Copper	6/69	(0.33 - 5)	91.3%	0.703	5.91	0.514	0.752	0.627	2
Nickel	64/69	(2 - 5.86)	7.2%	1.96	7.84	4.262	1.501	4.45	6.608
Silver	0/69	(0.0878 - 2)	100.0%	--	--	--	--	0.33	2
Vanadium	3/69	(0.1 - 4.96)	95.7%	0.97	3.64	0.229	0.514	1	4
Zinc <sup>2</sup>	29/68	(1.83 - 50)	57.4%	6.17	35.3	7.897	4.342	8.3	25

Summary Statistics - Groundwater Investigation									
Kingston Fossil Plant - Harriman, Tennessee									
Parameter	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
				Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
<b>Well: AD-3</b>									
<b>CCR Rule Appendix III Parameters</b>									
Boron	63/67	(379 - 1,000)	6.0%	361	1,870	1,036	444.6	1,000	1,768
Calcium	67/67	--	0.0%	120,000	432,000	281,075	102,086	315,000	395,800
Chloride	61/67	(1,000 - 20,000)	9.0%	1,710	8,660	5,167	2,392	5,960	8,444
Fluoride <sup>1</sup> (also Appendix IV)	56/69	(72.3 - 2,000)	18.8%	51.5	426	163.4	76.72	146	308.6
pH	42/42	--	0.0%	6.27	7.3	6.657	0.218	6.675	7.071
Sulfate	66/67	(1,000 - 1,000)	1.5%	186,000	1,130,000	601,687	294,215	696,000	961,700
TDS	67/67	--	0.0%	247,000	1,870,000	1,161,970	462,685	1,310,000	1,757,000
<b>CCR Rule Appendix IV Parameters</b>									
Antimony	1/69	(0.303 - 2)	98.6%	0.345	0.345	0.305	0.00839	0.378	2
Arsenic	12/69	(0.0743 - 2)	82.6%	0.34	2.57	0.211	0.397	0.33	2
Barium	67/69	(19.5 - 200)	2.9%	12.5	57.9	26.88	9.835	24.7	47.94
Beryllium	1/69	(0.064 - 2)	98.6%	0.205	0.205	0.0696	0.0276	0.33	2
Cadmium	0/69	(0.125 - 1)	100.0%	--	--	--	--	0.33	1
Chromium	5/69	(0.09 - 4.1)	92.8%	0.333	5.64	0.261	0.765	1.53	2.18
Cobalt	73/73	--	0.0%	2.35	8.57	5.268	1.852	5.32	8.136
Lead	1/69	(0.0603 - 2)	98.6%	0.183	0.183	0.0641	0.0213	0.33	2
Lithium	28/43	(0.794 - 50)	34.9%	4.92	22.1	9.691	3.829	11.4	50
Mercury	0/69	(0.0392 - 1.5)	100.0%	--	--	--	--	0.15	0.2
Molybdenum	6/67	(0.33 - 5)	91.0%	0.36	0.769	0.356	0.0732	0.61	2
Radium-226+228	10/48	(0 - 2)	79.2%	0.096	1.691	0.168	0.33	0.42	1.061
Selenium	0/69	(0.316 - 5)	100.0%	--	--	--	--	1.51	2.62
Thallium	6/69	(0.0239 - 2)	91.3%	0.179	0.941	0.0891	0.199	0.472	2
<b>TDEC Appendix I Parameters</b>									
Copper	6/69	(0.33 - 5)	91.3%	0.53	14.4	0.575	1.681	0.627	2
Nickel	59/69	(1.33 - 5)	14.5%	0.97	7.78	2.424	1.114	2.59	4.366
Silver	0/69	(0.0878 - 2)	100.0%	--	--	--	--	0.33	2
Vanadium	3/69	(0.1 - 4)	95.7%	1.21	2.56	0.185	0.385	1	4
Zinc <sup>2</sup>	9/68	(1.83 - 50)	86.8%	3.29	15.4	2.733	2.352	8.3	25
<b>Well: KIF-105</b>									
<b>CCR Rule Appendix III Parameters</b>									
Boron	27/27	--	0.0%	1,650	2,250	1,848	145.9	1,820	2,105
Calcium	27/27	--	0.0%	155,000	203,000	176,481	9,776	176,000	187,700
Chloride	27/27	--	0.0%	6,760	25,500	11,190	5,442	8,720	23,410
Fluoride <sup>1</sup> (also Appendix IV)	18/27	(26.3 - 132)	33.3%	38.8	123	54.52	18.84	58.3	118.8
pH	26/26	--	0.0%	5.16	5.78	5.563	0.174	5.615	5.77
Sulfate	27/27	--	0.0%	503,000	601,000	545,481	26,471	546,000	591,000
TDS	27/27	--	0.0%	781,000	919,000	847,185	33,185	840,000	902,600
<b>CCR Rule Appendix IV Parameters</b>									
Antimony	1/27	(0.378 - 1.12)	96.3%	0.83	0.83	0.396	0.0886	0.378	1.033
Arsenic	22/27	(0.466 - 1.17)	18.5%	0.35	1.21	0.596	0.212	0.623	1.134
Barium	25/27	(18.1 - 18.6)	7.4%	17.5	23	19.33	1.412	19.1	22.32
Beryllium	8/27	(0.155 - 1.15)	70.4%	0.057	0.473	0.123	0.0992	0.182	0.414
Cadmium	27/27	--	0.0%	0.387	2.38	1.026	0.546	0.751	1.936
Chromium	0/27	(1.17 - 3.77)	100.0%	--	--	--	--	1.53	2.64
Cobalt	27/27	--	0.0%	16.5	33.9	21.17	5.57	18.5	31.35
Lead	19/27	(0.128 - 0.225)	29.6%	0.132	0.325	0.19	0.0671	0.17	0.314
Lithium	8/27	(2.56 - 3.39)	70.4%	2.6	7.44	3.034	0.922	3.39	3.638
Mercury	0/27	(0.101 - 0.13)	100.0%	--	--	--	--	0.101	0.13
Molybdenum	0/27	(0.474 - 1.05)	100.0%	--	--	--	--	0.61	0.61
Radium-226+228	8/27	(0.215 - 1.398)	70.4%	0.429	1.748	0.449	0.373	0.56	1.37
Selenium	1/27	(0.739 - 2.62)	96.3%	0.883	0.883	0.763	0.0537	1.51	2.62
Thallium	19/27	(0.128 - 0.472)	29.6%	0.159	0.975	0.26	0.168	0.232	0.493
<b>TDEC Appendix I Parameters</b>									
Copper	0/27	(0.627 - 4.33)	100.0%	--	--	--	--	0.627	1.3
Nickel	27/27	--	0.0%	16.1	33.6	20.84	5.544	18.8	32.39
Silver	0/27	(0.121 - 0.223)	100.0%	--	--	--	--	0.177	0.223
Vanadium	1/27	(0.776 - 2.43)	96.3%	1.09	1.09	0.792	0.0684	0.991	2.103
Zinc	24/27	(13.5 - 17.5)	11.1%	12.5	38	19.03	8.294	14.9	36.93

Summary Statistics - Groundwater Investigation									
Kingston Fossil Plant - Harriman, Tennessee									
Parameter	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
				Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
<b>Well: KIF-106</b>									
<b>CCR Rule Appendix III Parameters</b>									
Boron	26/27	(345 - 345)	3.7%	248	414	324.5	42.37	315	382.2
Calcium	27/27	--	0.0%	71,200	202,000	116,281	47,052	86,800	195,800
Chloride	27/27	--	0.0%	7,160	36,000	16,348	9,858	9,200	34,260
Fluoride <sup>1</sup> (also Appendix IV)	23/27	(120 - 149)	14.8%	68.2	202	144.6	40.14	157	192.7
pH	28/28	--	0.0%	6.48	6.94	6.667	0.102	6.65	6.823
Sulfate	27/27	--	0.0%	85,000	446,000	204,789	135,221	106,000	418,700
TDS	27/27	--	0.0%	283,000	883,000	489,630	219,962	329,000	837,800
<b>CCR Rule Appendix IV Parameters</b>									
Antimony	0/27	(0.378 - 1.12)	100.0%	--	--	--	--	0.378	0.984
Arsenic	23/27	(0.904 - 2.66)	14.8%	0.668	4.28	1.694	1.249	1.05	4.154
Barium	27/27	--	0.0%	34.2	65.8	48.35	7.929	48.1	58.89
Beryllium	1/27	(0.057 - 0.274)	96.3%	0.206	0.206	0.0635	0.0304	0.182	0.274
Cadmium	1/27	(0.125 - 0.217)	96.3%	0.159	0.159	0.127	0.00848	0.125	0.217
Chromium	2/27	(1.17 - 4.48)	92.6%	1.64	1.99	1.228	0.191	1.53	2.481
Cobalt	27/27	--	0.0%	2.3	3.68	3.088	0.322	3.17	3.432
Lead	3/27	(0.094 - 0.309)	88.9%	0.132	0.187	0.103	0.0251	0.128	0.22
Lithium	24/27	(3.33 - 6.97)	11.1%	3.44	14.9	7.043	3.507	5.64	14.15
Mercury	0/27	(0.101 - 0.13)	100.0%	--	--	--	--	0.101	0.13
Molybdenum	11/27	(0.474 - 0.61)	59.3%	2.08	5.27	1.742	1.68	0.61	4.954
Radium-226+228	3/27	(0.0143 - 1.357)	88.9%	0.427	1.541	0.125	0.319	0.407	1.235
Selenium	0/27	(0.739 - 2.62)	100.0%	--	--	--	--	1.51	2.62
Thallium	2/27	(0.063 - 0.472)	92.6%	0.161	0.199	0.0747	0.0356	0.148	0.472
<b>TDEC Appendix I Parameters</b>									
Copper	1/27	(0.627 - 1.3)	96.3%	0.699	0.699	0.631	0.0157	0.627	1.252
Nickel	24/27	(1.36 - 1.93)	11.1%	1.01	2.11	1.566	0.249	1.57	1.979
Silver	0/27	(0.121 - 0.223)	100.0%	--	--	--	--	0.177	0.223
Vanadium	0/27	(0.776 - 4.96)	100.0%	--	--	--	--	0.991	2.33
Zinc	8/27	(2.42 - 3.53)	70.4%	2.48	48.1	5.055	8.805	3.22	12.2



Summary Statistics - Groundwater Investigation									
Kingston Fossil Plant - Harriman, Tennessee									
Parameter	Frequency of Detection	Range of Reporting Limits	% Non Detect	Statistics using Detected Data Only		Statistics using Detects & Non-Detects			
				Minimum Detect	Maximum Detect	Mean	Standard Deviation	50 <sup>th</sup> Percentile	95 <sup>th</sup> Percentile
<b>Well: KIF-109</b>									
<b>CCR Rule Appendix III Parameters</b>									
Boron	6/13	(38.6 - 116)	53.8%	45.3	939	138.1	244	60.1	579
Calcium	13/13	--	0.0%	49,100	120,000	61,985	19,743	53,500	96,780
Chloride	13/13	--	0.0%	4,570	8,810	5,896	1,127	5,990	7,664
Fluoride <sup>1</sup> (also Appendix IV)	9/13	(26 - 64.8)	30.8%	26.8	67.5	39.9	13.22	46.7	65.88
pH	12/12	--	0.0%	5.81	6.33	6.003	0.126	5.99	6.187
Sulfate	13/13	--	0.0%	112,000	395,000	187,000	97,444	136,000	385,400
TDS	13/13	--	0.0%	350,000	721,000	484,923	118,309	444,000	709,000
<b>CCR Rule Appendix IV Parameters</b>									
Antimony	0/13	(0.378 - 0.506)	100.0%	--	--	--	--	0.378	0.506
Arsenic	13/13	--	0.0%	1.47	2.82	2.388	0.349	2.43	2.766
Barium	13/13	--	0.0%	127	162	153	9.983	156	161.4
Beryllium	0/13	(0.182 - 0.274)	100.0%	--	--	--	--	0.182	0.274
Cadmium	0/13	(0.217 - 0.217)	100.0%	--	--	--	--	0.217	0.217
Chromium	0/13	(1.53 - 1.53)	100.0%	--	--	--	--	1.53	1.53
Cobalt	13/13	--	0.0%	1.8	13.9	4.122	3.239	2.92	9.22
Lead	0/13	(0.128 - 0.167)	100.0%	--	--	--	--	0.128	0.167
Lithium	5/13	(3.39 - 3.39)	61.5%	0.934	5.2	1.548	1.069	3.39	4.114
Mercury	0/13	(0.13 - 0.13)	100.0%	--	--	--	--	0.13	0.13
Molybdenum	1/13	(0.61 - 0.61)	92.3%	0.67	0.67	0.615	0.016	0.61	0.634
Radium-226+228	6/13	(0.246 - 1.687)	53.8%	0.828	1.652	0.826	0.56	1.05	1.666
Selenium	0/13	(0.739 - 1.51)	100.0%	--	--	--	--	1.51	1.51
Thallium	1/13	(0.148 - 0.472)	92.3%	0.341	0.341	0.169	0.0607	0.148	0.472
<b>TDEC Appendix I Parameters</b>									
Copper	1/13	(0.627 - 1.14)	92.3%	10.1	10.1	1.356	2.524	0.627	4.724
Nickel	12/13	(1.63 - 1.63)	7.7%	0.959	13.1	2.64	3.136	1.49	7.772
Silver	0/13	(0.177 - 0.223)	100.0%	--	--	--	--	0.177	0.223
Vanadium	0/13	(0.776 - 0.991)	100.0%	--	--	--	--	0.991	0.991
Zinc	7/13	(2.88 - 5.3)	46.2%	3.31	8.6	4.269	1.734	4.08	7.202

**Notes:**

CCR Rule - Title 40, Code of Federal Regulations, Part 257

"--" : Not Applicable

TDEC - Tennessee Department of Environment and Conservation

Except for Radium-226 + 228, and pH, all units micrograms per liter (µg/L).

Units for Radium 226+228 are picocuries per liter (pCi/L).

Units for pH are standard units (SU).

Mean and Standard Deviation are Kaplan Meier (KM) Mean and Standard Deviation for data with reported non-detect values.

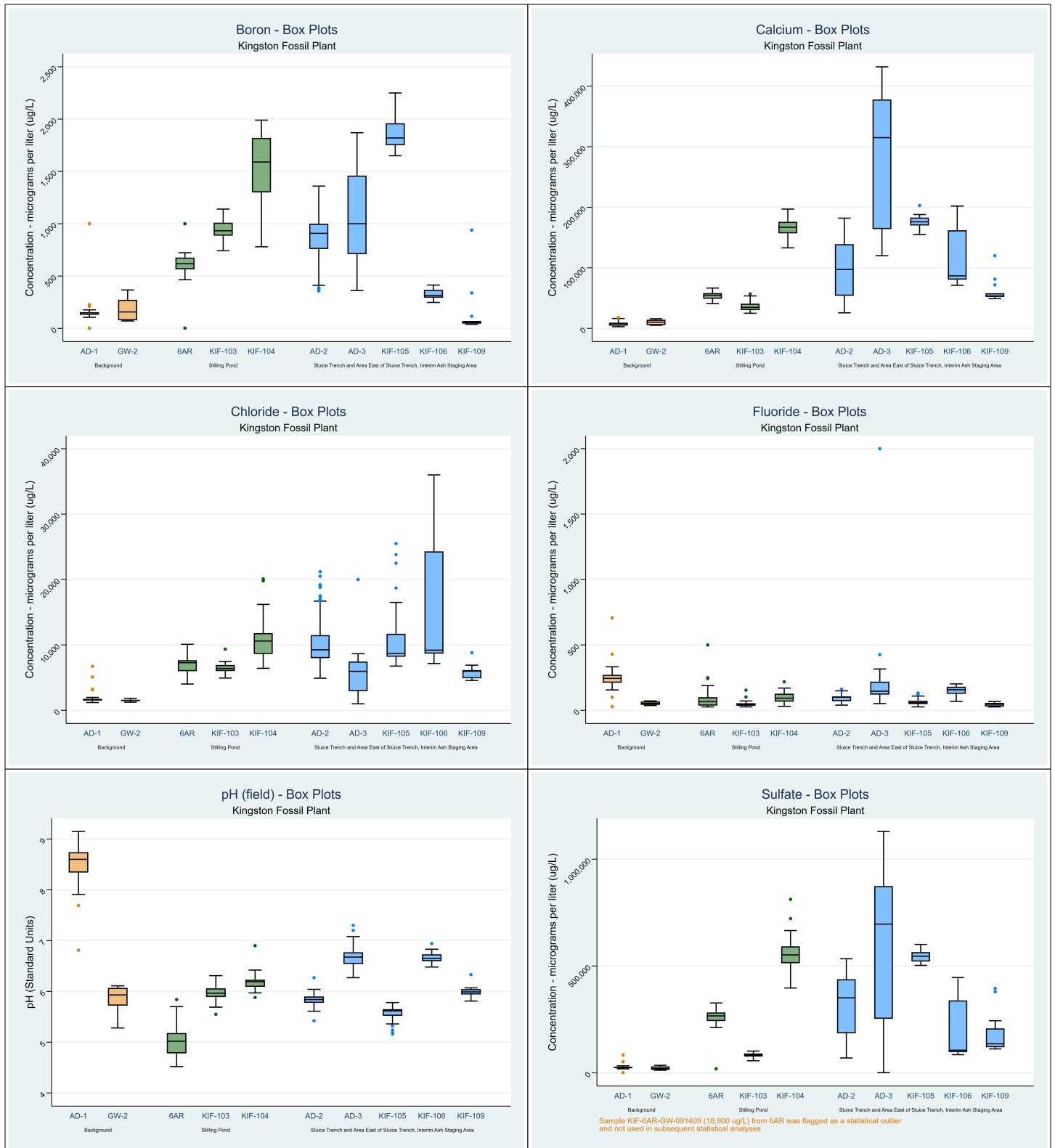
All non-detects reported at the laboratory reporting limit

<sup>1</sup>Fluoride is both a CCR Rule Appendix III and CCR Rule Appendix IV constituent. In this table, fluoride has been grouped with the Appendix III constituents only to avoid duplication of results.

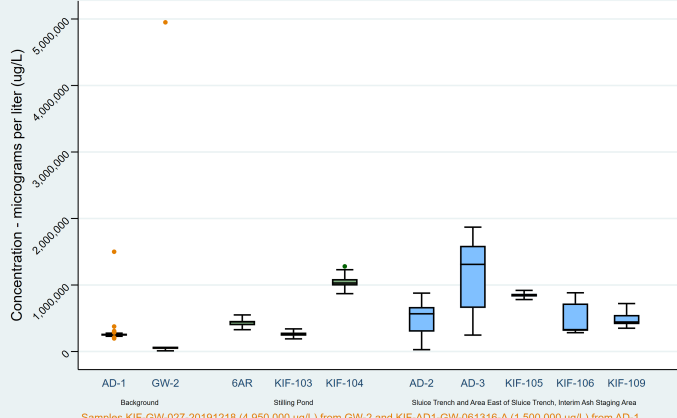
<sup>2</sup>Summary statistics shown here calculated with identified outlier removed (see Section 3.1 for list of identified outliers)

**ATTACHMENT E.3-B**  
**BOX PLOTS**

Box Plots  
 CCR Rule Appendix III Parameters  
 Kingston Fossil Plant - Harriman, Tennessee



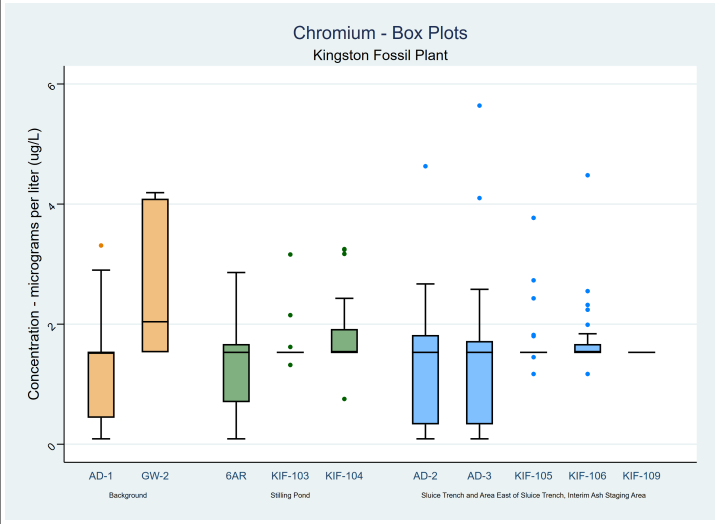
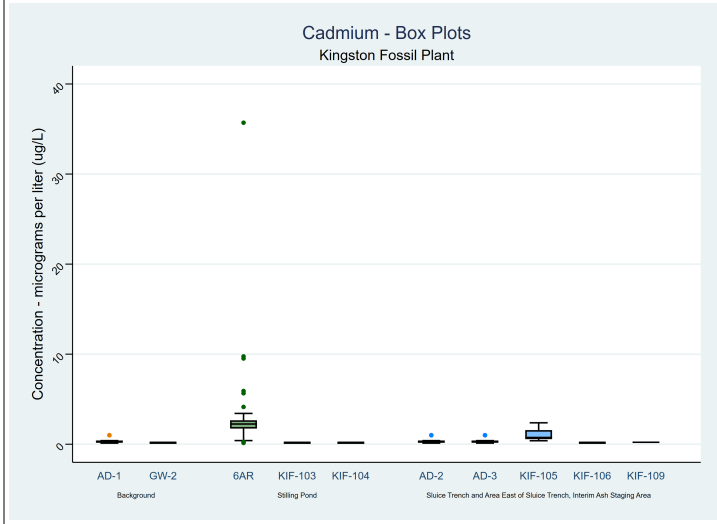
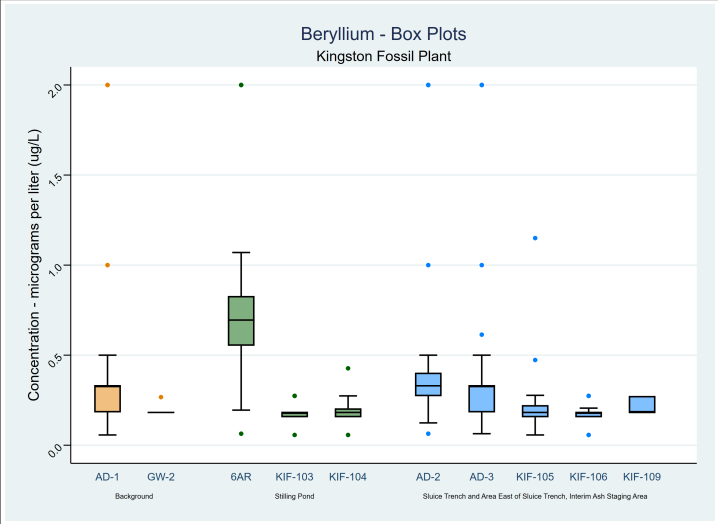
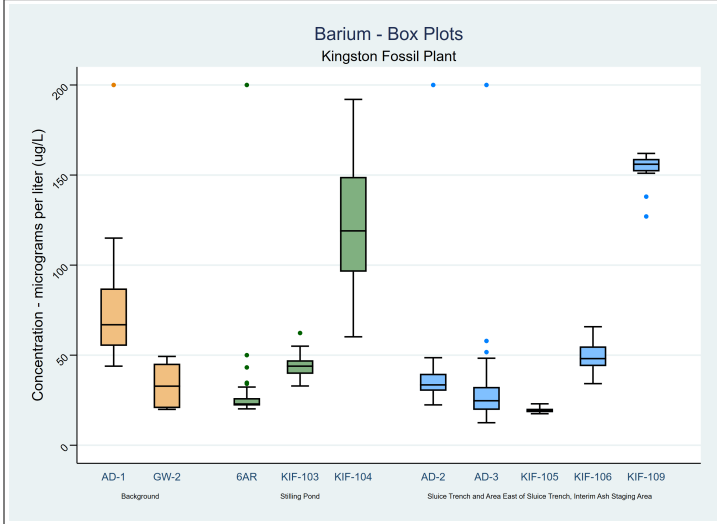
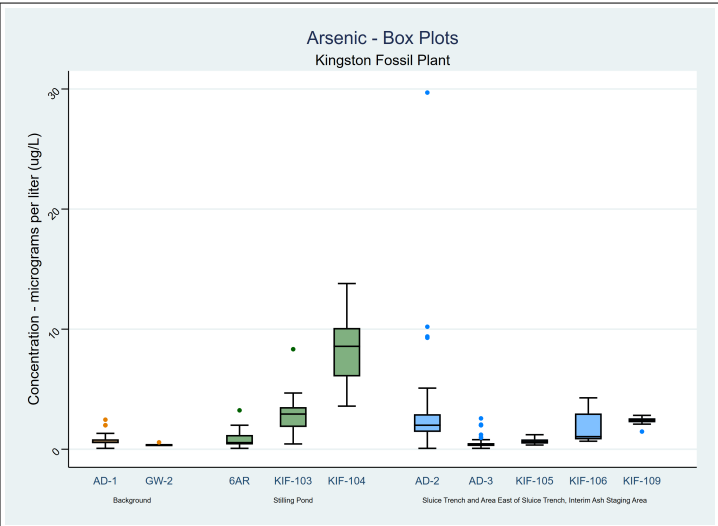
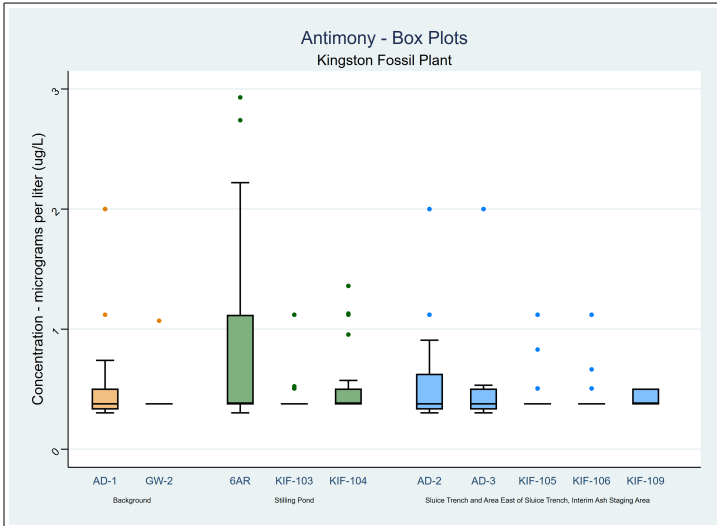
Total Dissolved Solids - Box Plots  
Kingston Fossil Plant



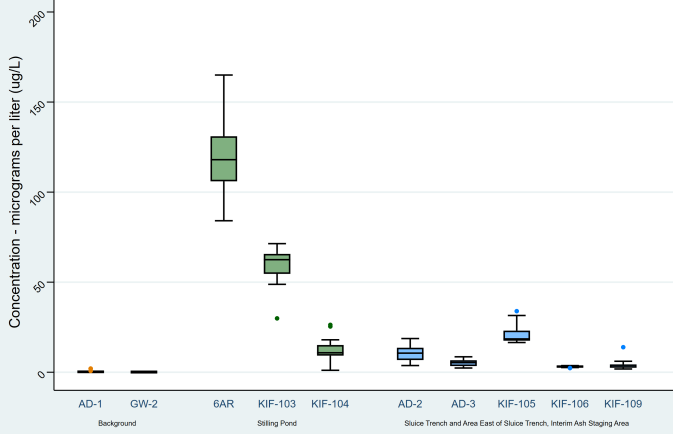
Samples KIF-GW-027-20191218 (4,950,000 ug/L) from GW-2 and KIF-AD1-GW-061316-A (1,500,000 ug/L) from AD-1 were flagged as statistical outliers and not used in subsequent statistical analyses

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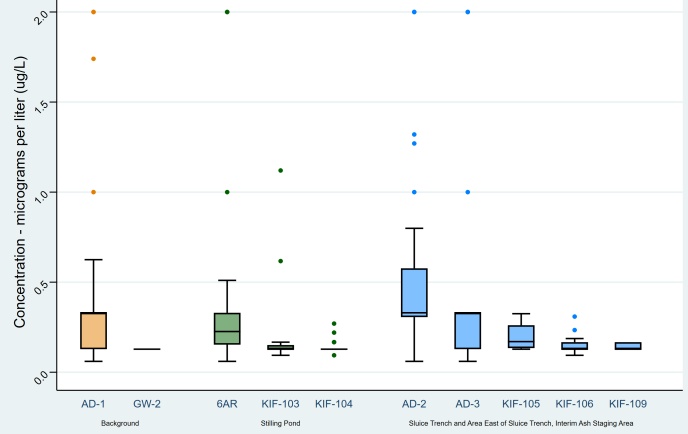
Box Plots  
 CCR Rule Appendix IV Parameters  
 Kingston Fossil Plant - Harriman, Tennessee



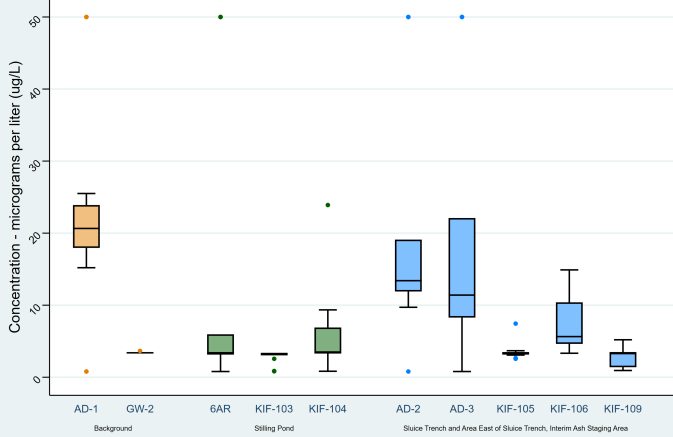
Cobalt - Box Plots  
Kingston Fossil Plant



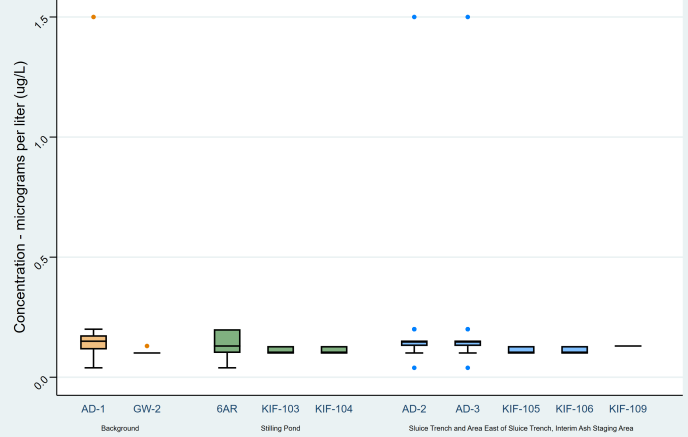
Lead - Box Plots  
Kingston Fossil Plant



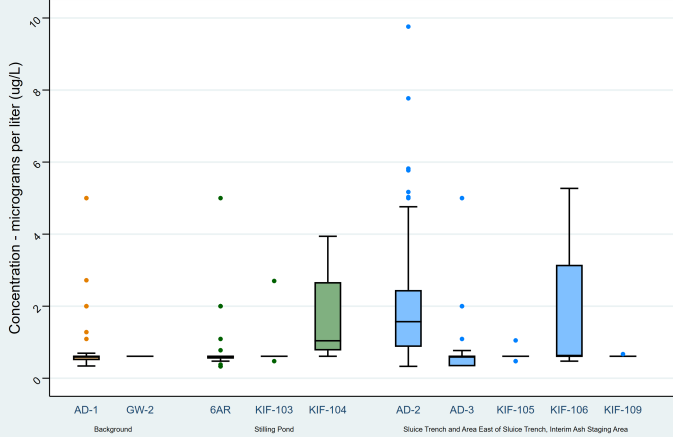
Lithium - Box Plots  
Kingston Fossil Plant



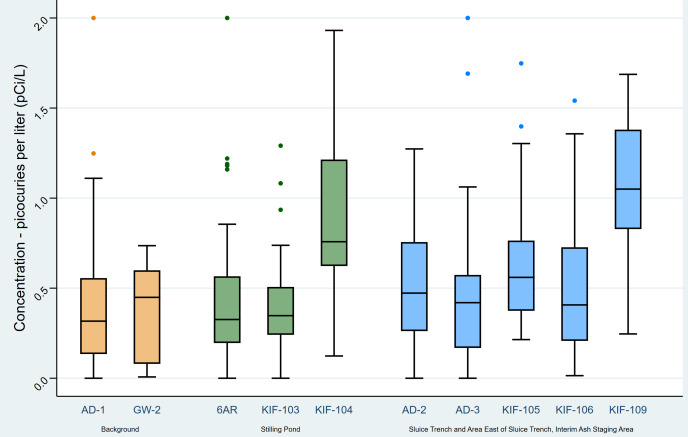
Mercury - Box Plots  
Kingston Fossil Plant



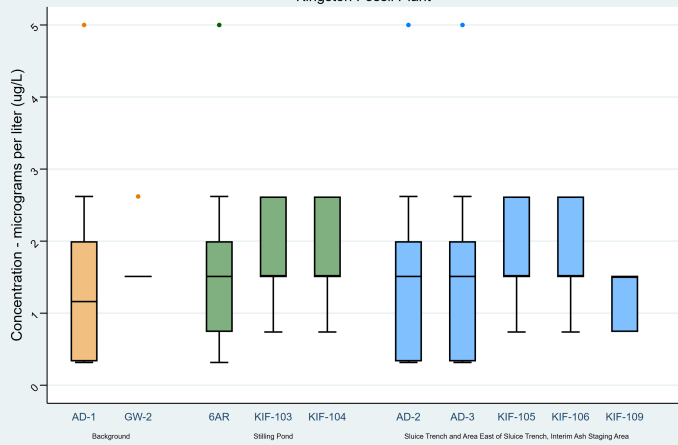
Molybdenum - Box Plots  
Kingston Fossil Plant



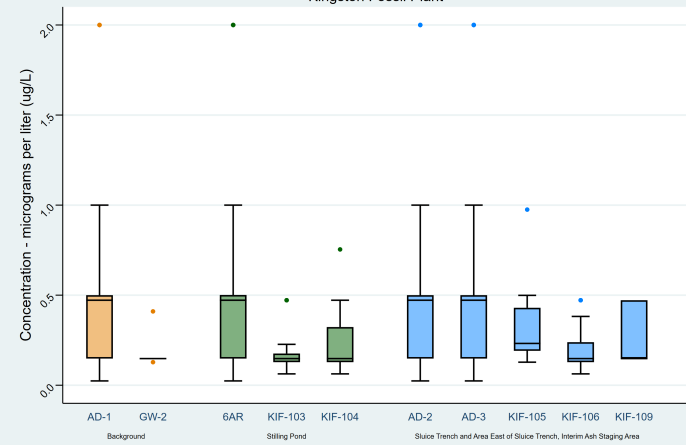
Radium 226+228 - Box Plots  
Kingston Fossil Plant



Selenium - Box Plots  
Kingston Fossil Plant



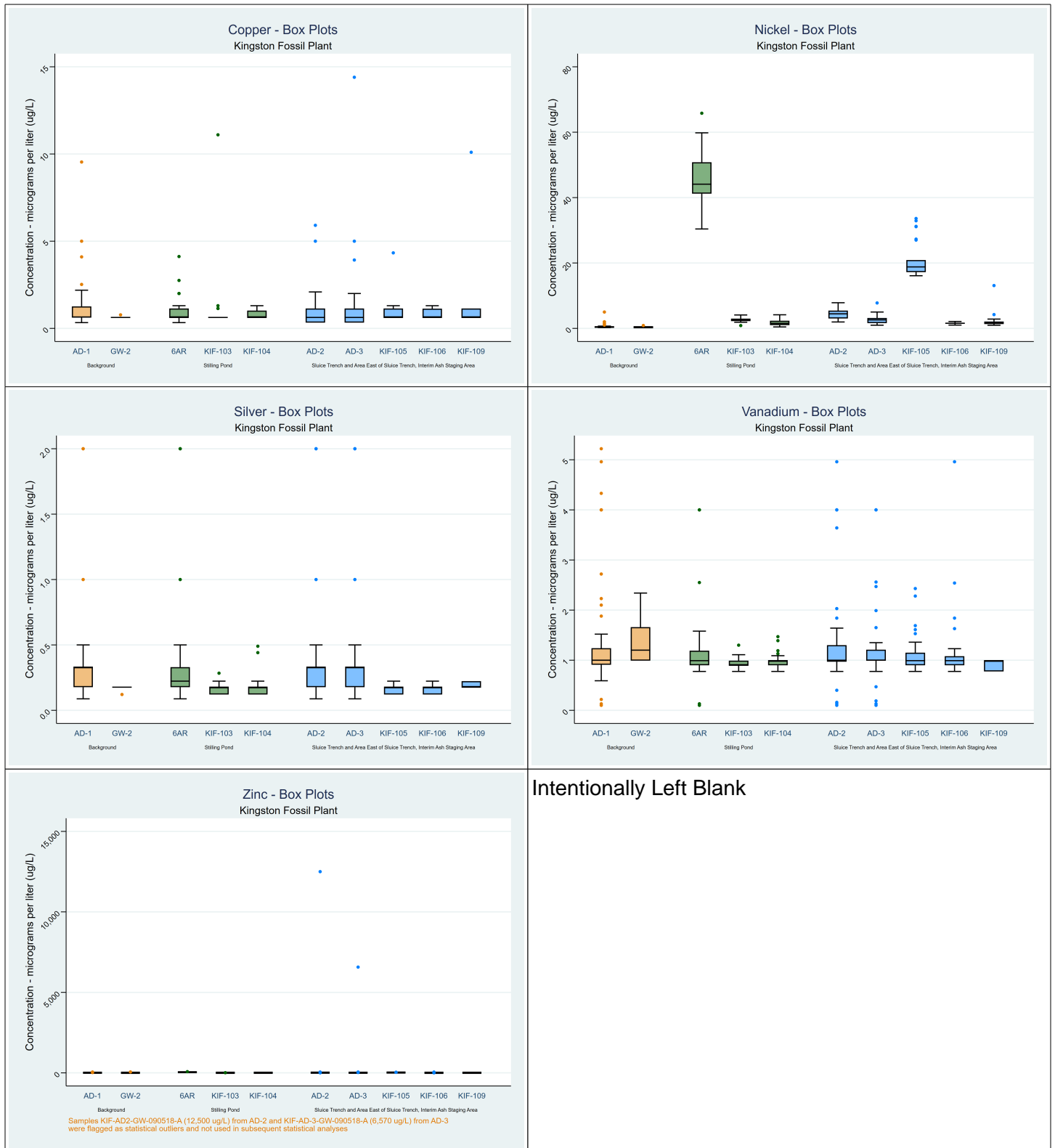
Thallium - Box Plots  
Kingston Fossil Plant



# Box Plots

## TDEC Appendix I Parameters

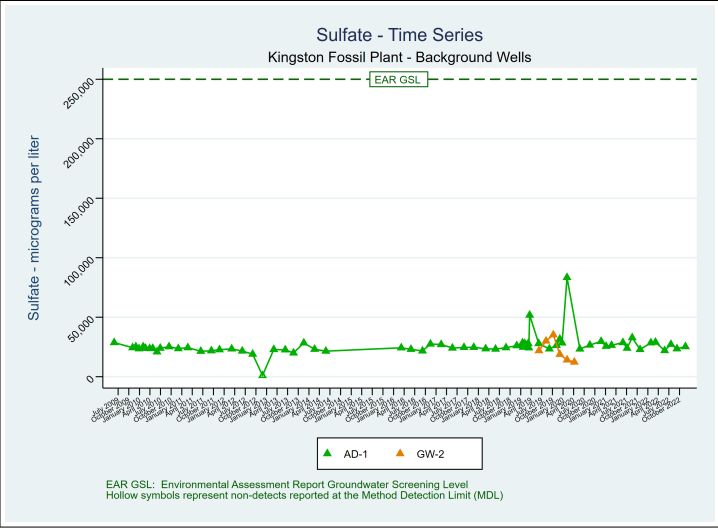
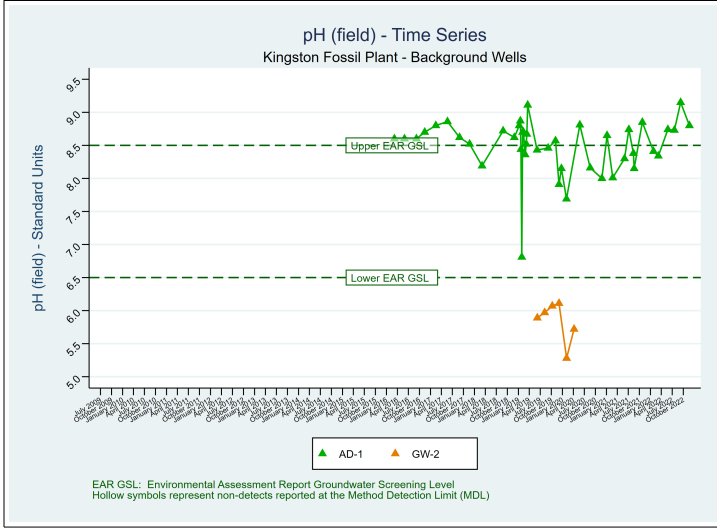
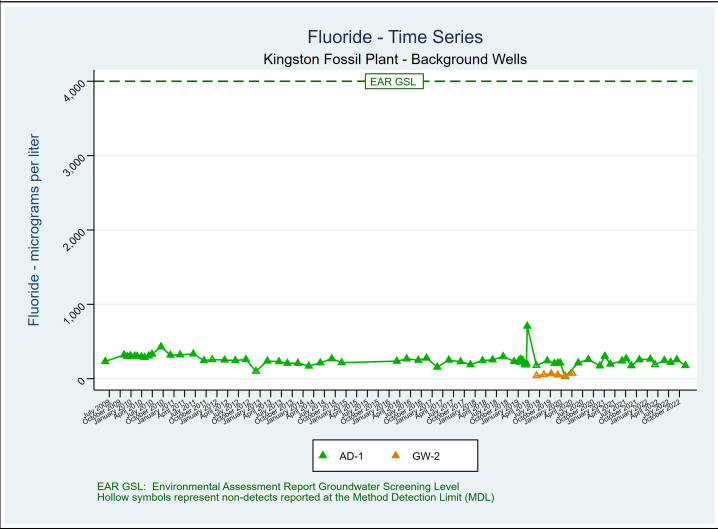
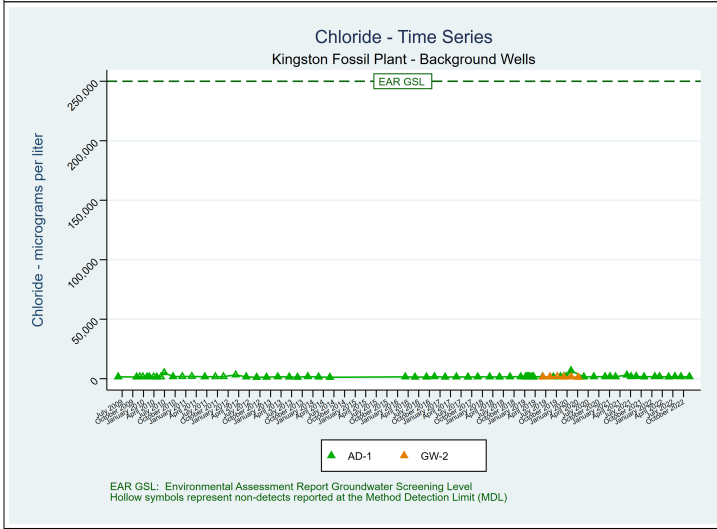
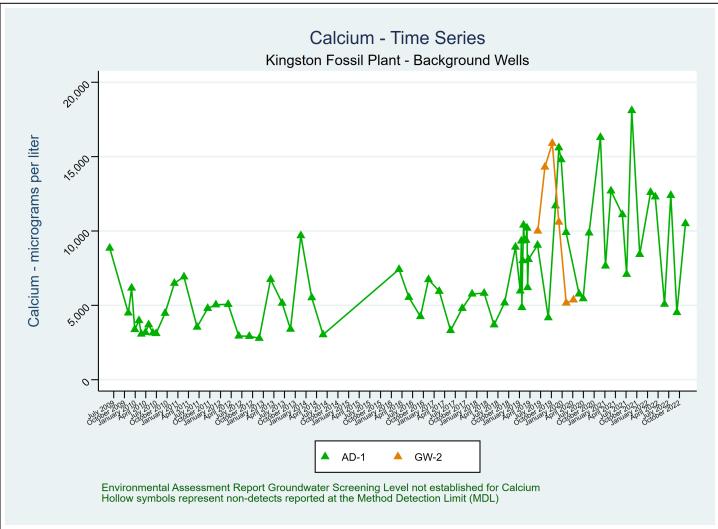
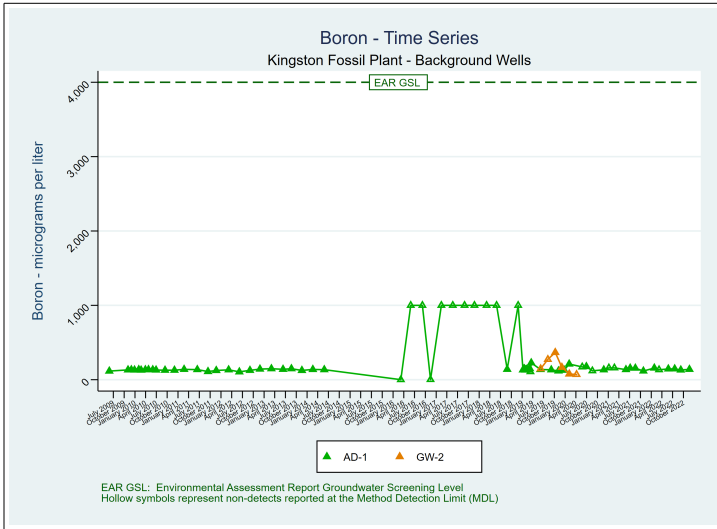
### Kingston Fossil Plant - Harriman, Tennessee



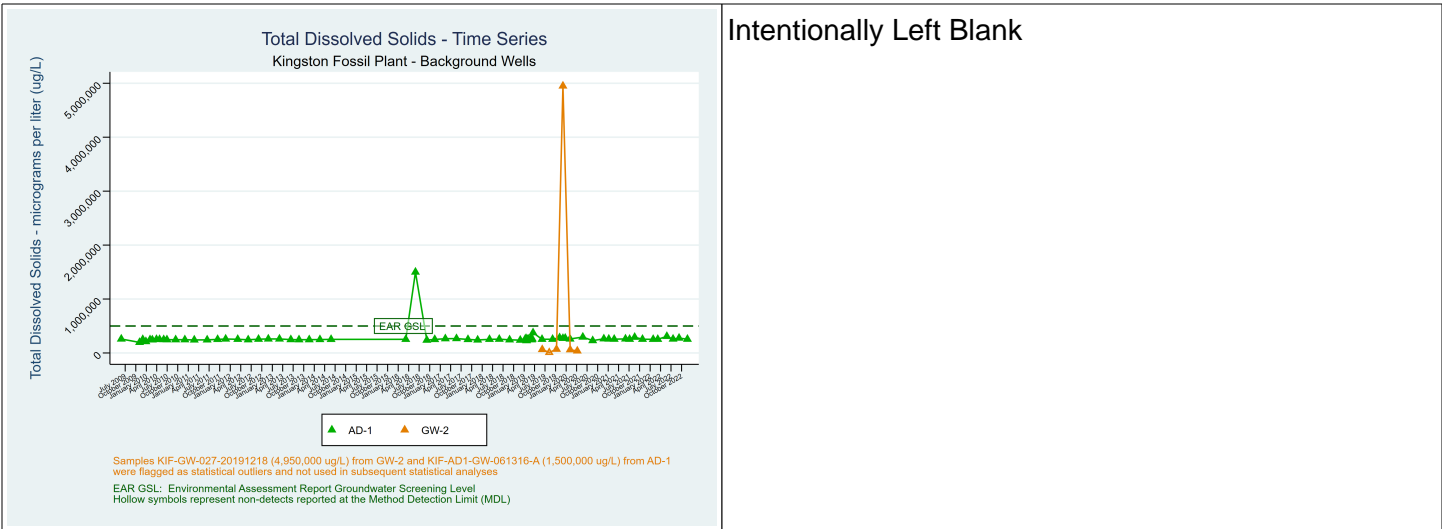


**ATTACHMENT E.3-C  
TIME SERIES PLOTS**

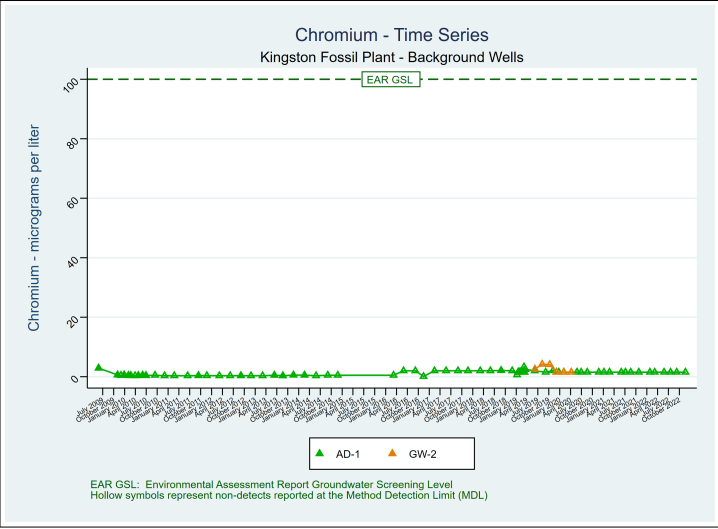
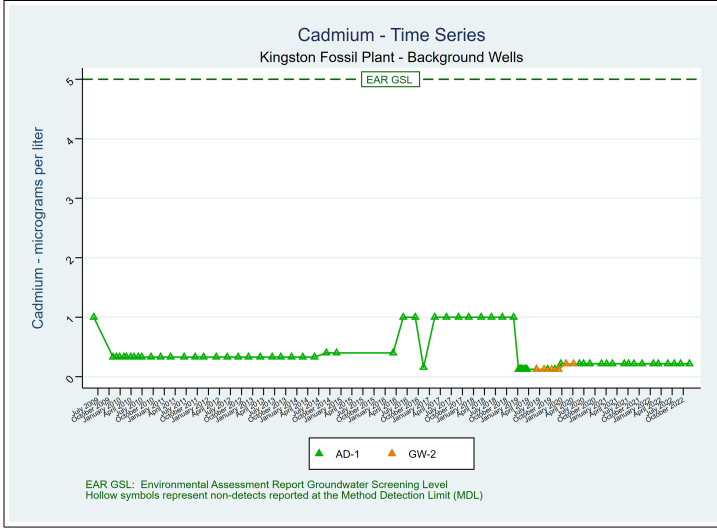
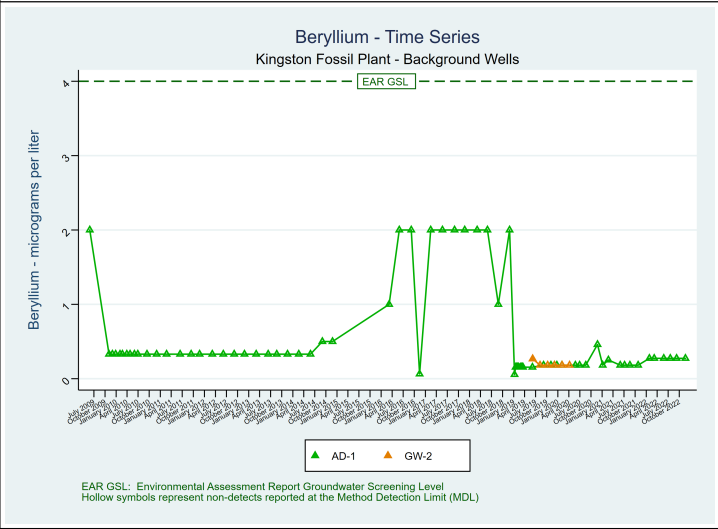
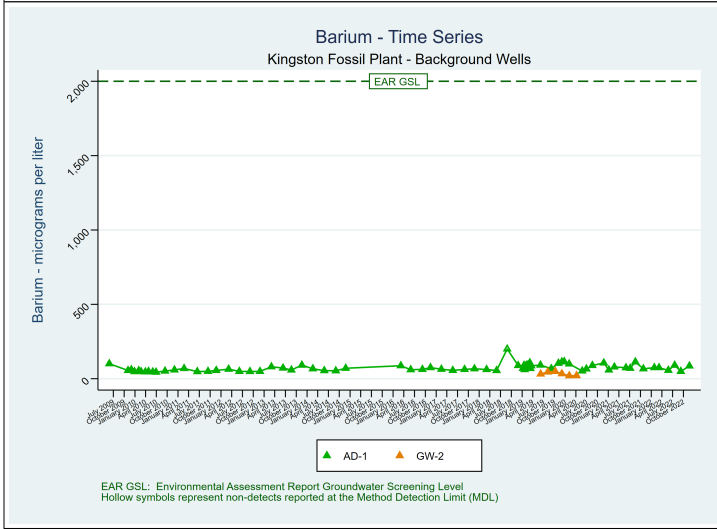
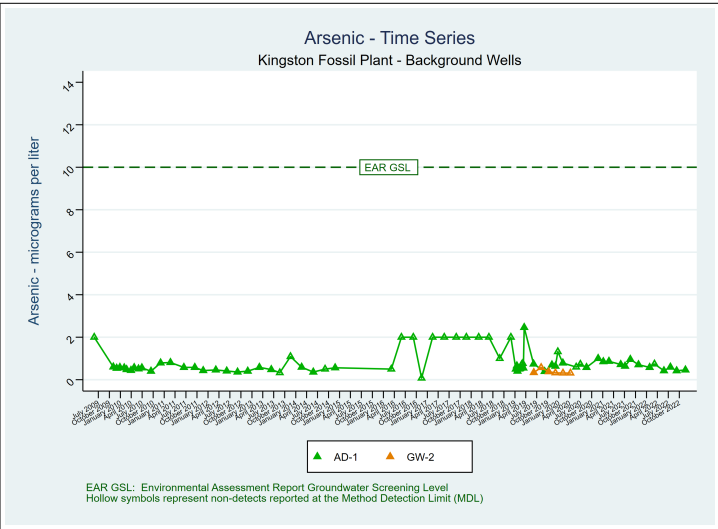
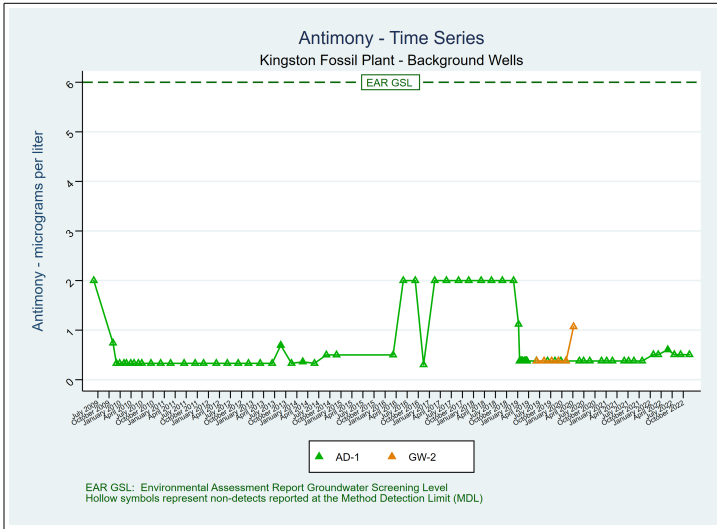
Time Series Plots  
 Background Wells  
 CCR Rule Appendix III Parameters  
 Kingston Fossil Plant - Harriman, Tennessee

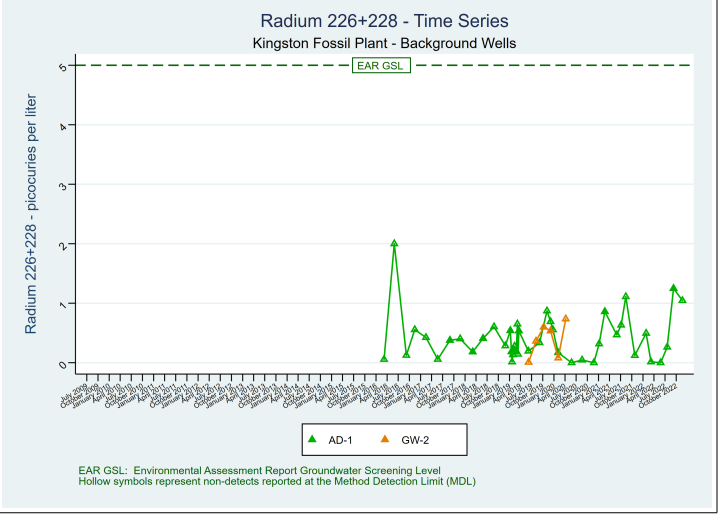
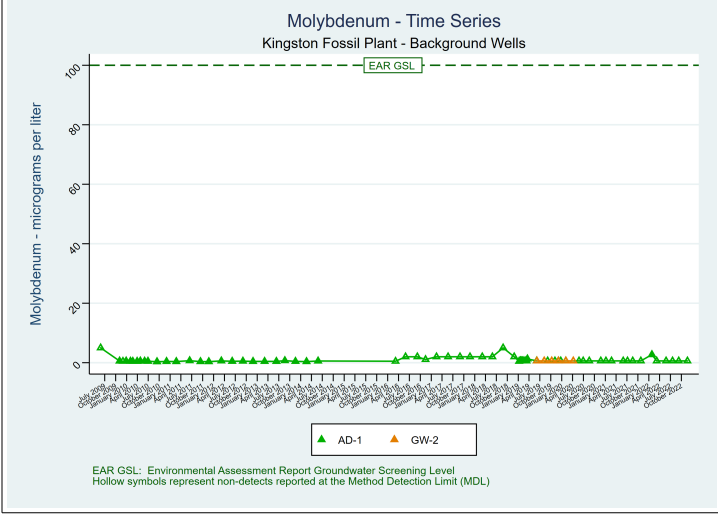
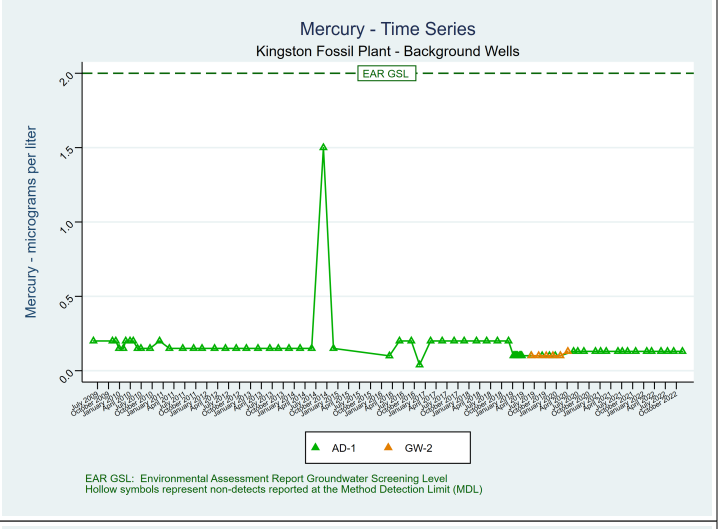
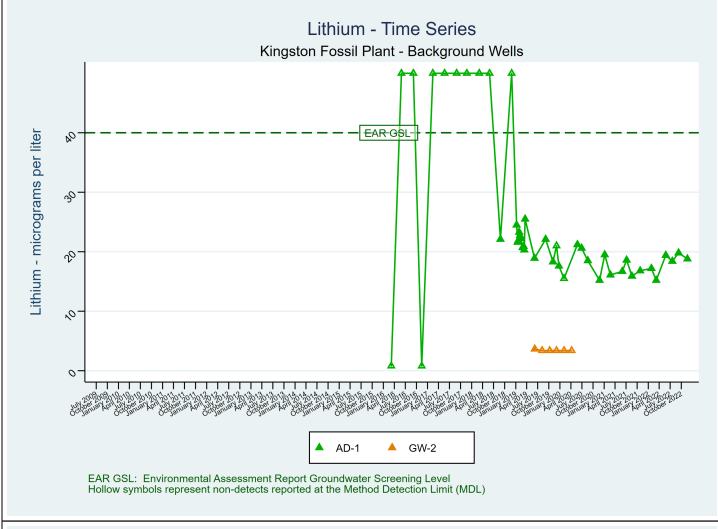
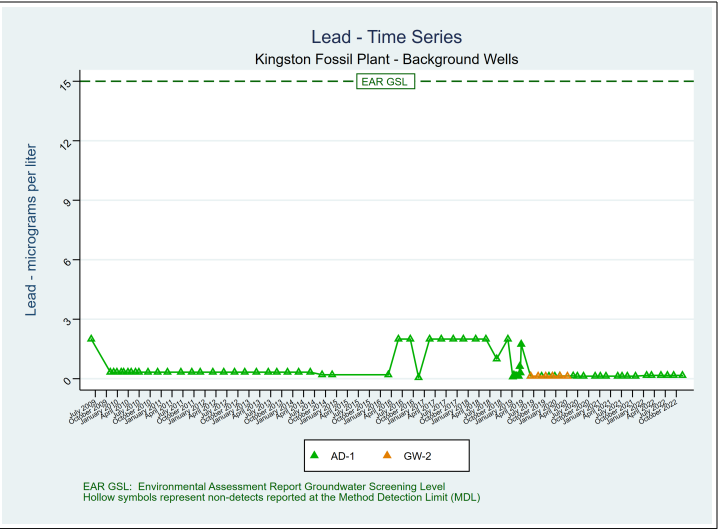
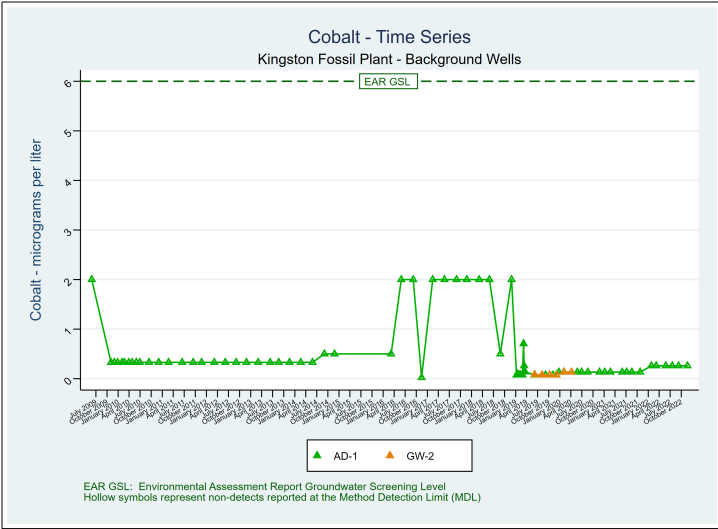


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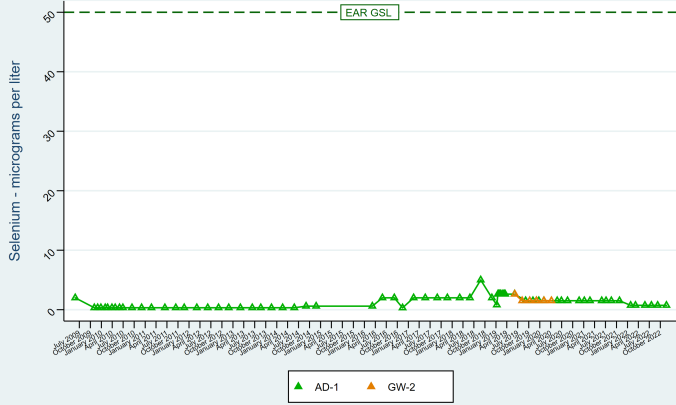


Time Series Plots  
 Background Wells  
 CCR Rule Appendix IV Parameters  
 Kingston Fossil Plant - Harriman, Tennessee



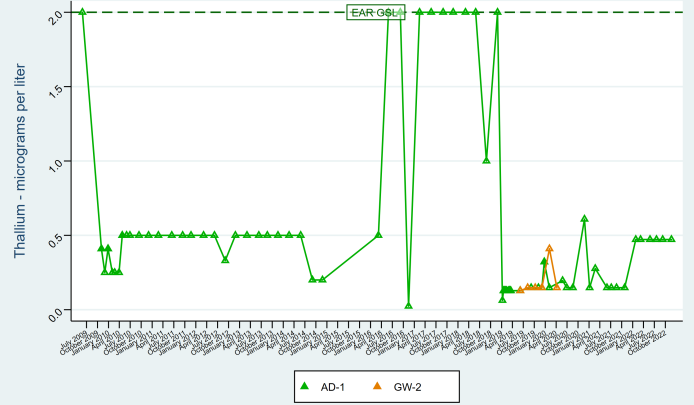


Selenium - Time Series  
Kingston Fossil Plant - Background Wells



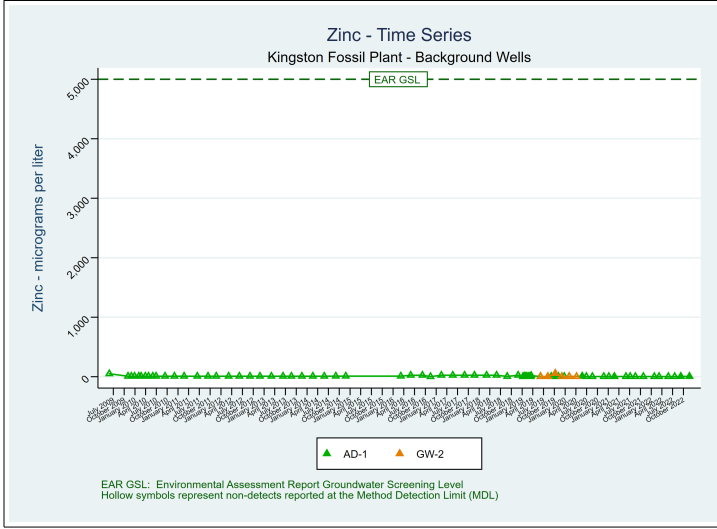
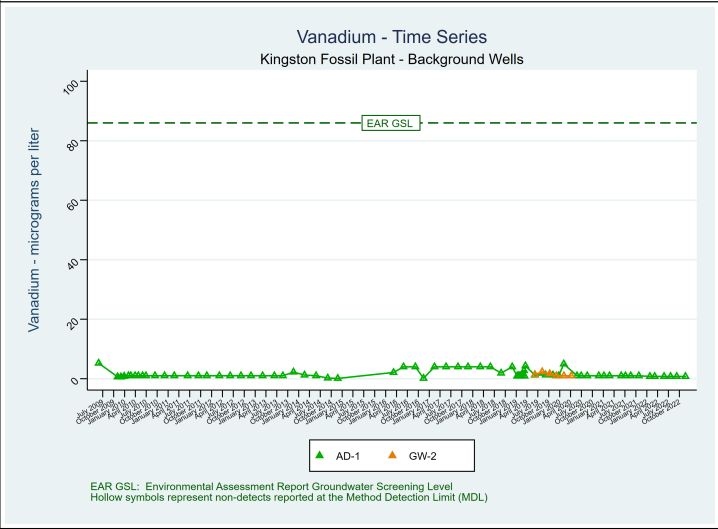
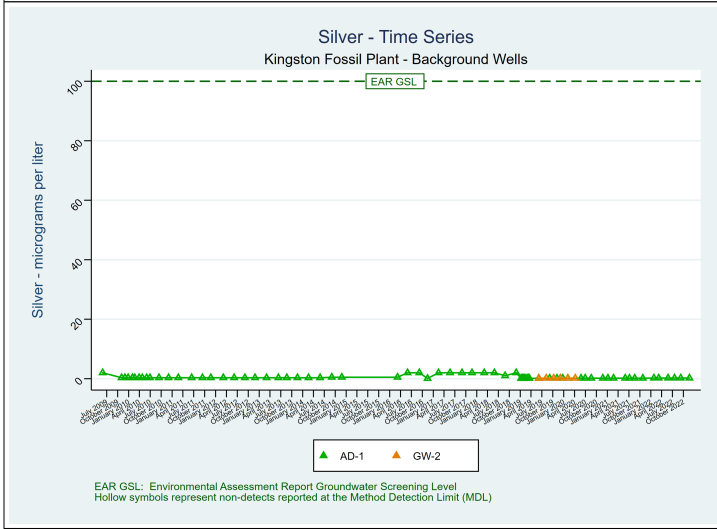
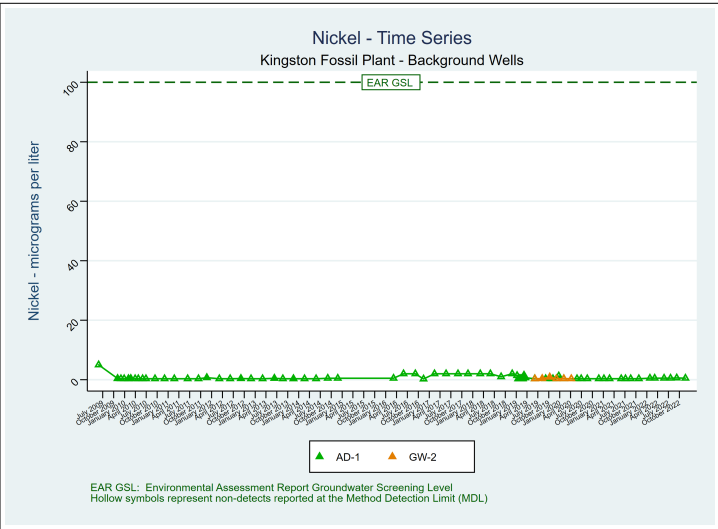
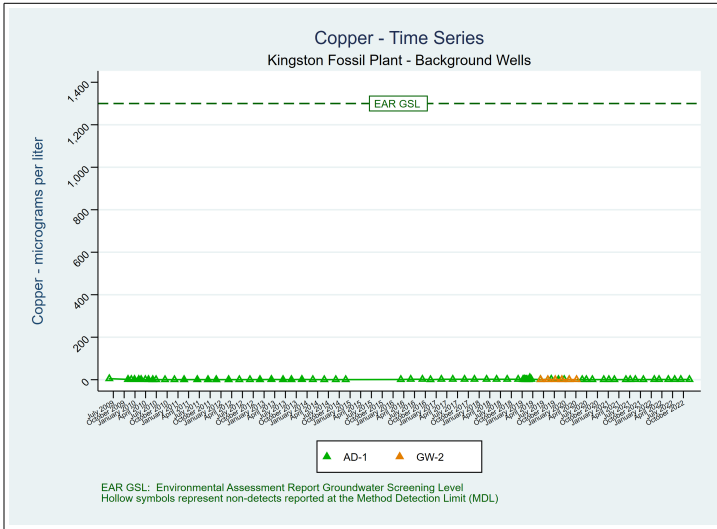
EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

Thallium - Time Series  
Kingston Fossil Plant - Background Wells



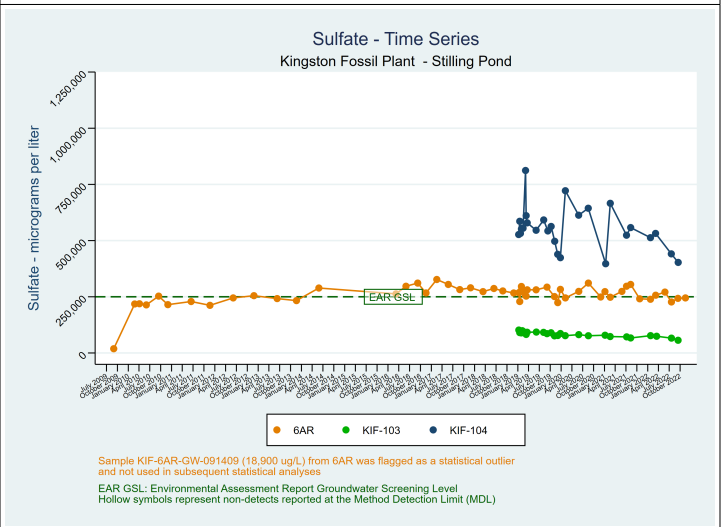
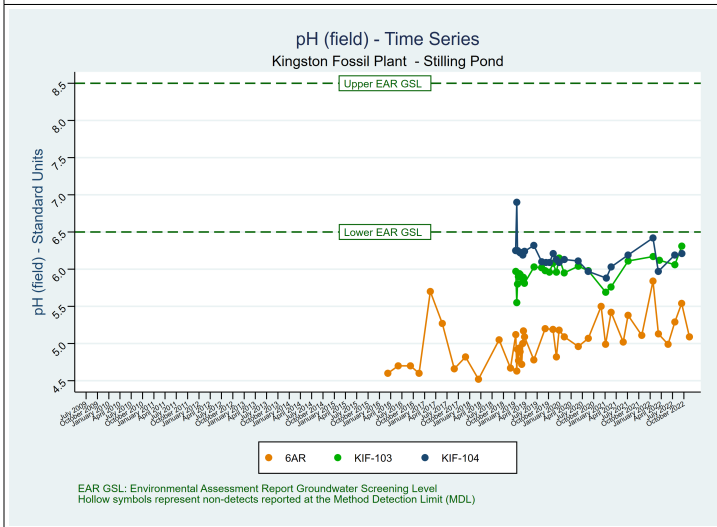
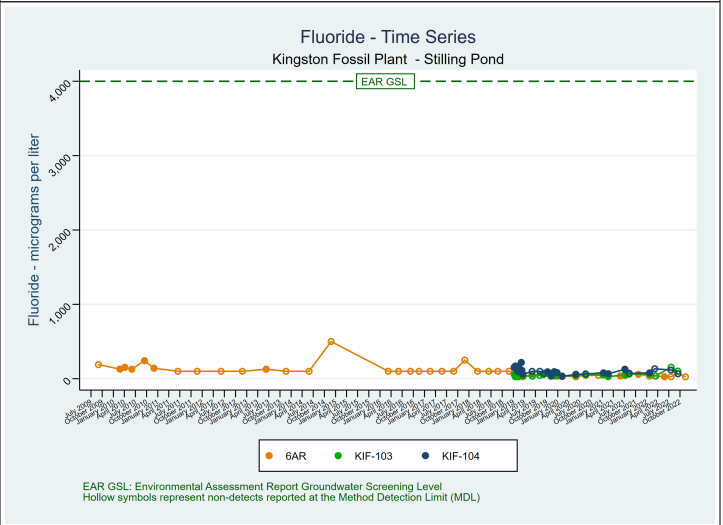
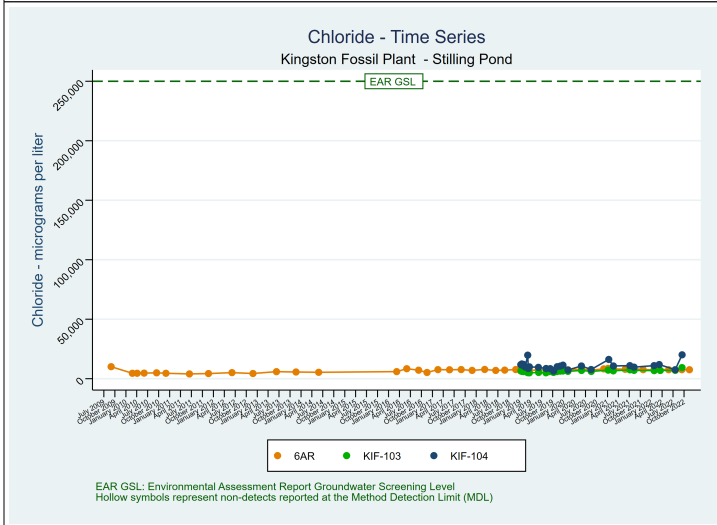
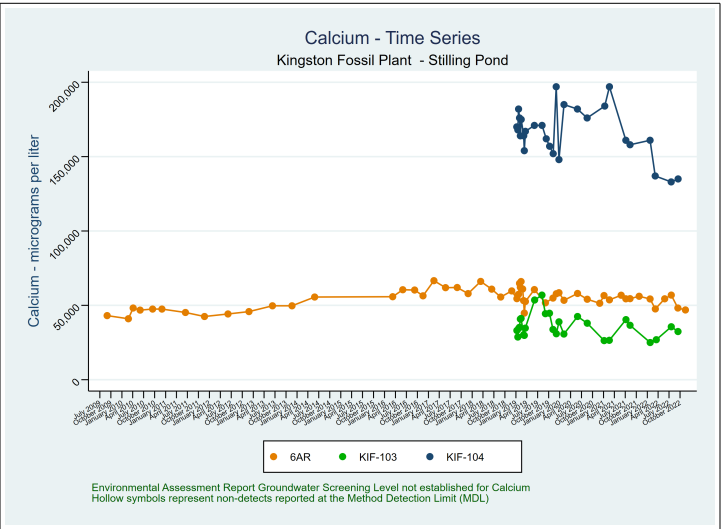
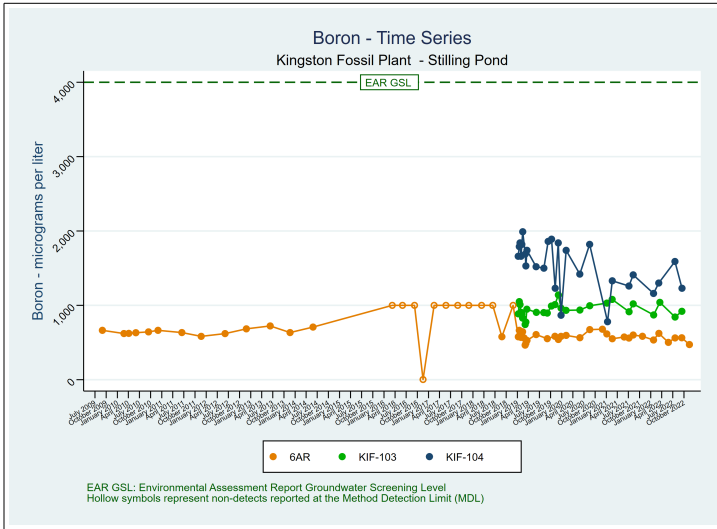
EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

Time Series Plots  
 Background Wells  
 TDEC Appendix I Parameters  
 Kingston Fossil Plant - Harriman, Tennessee



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Time Series Plots  
 Stilling Pond Wells  
 CCR Rule Appendix III Parameters  
 Kingston Fossil Plant - Harriman, Tennessee





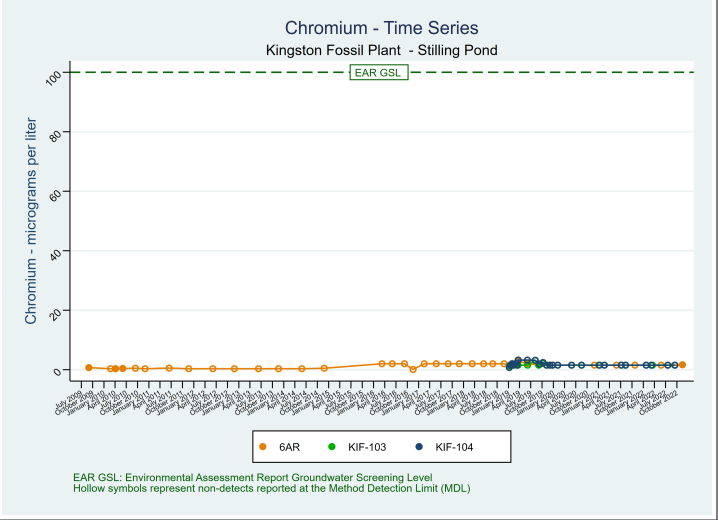
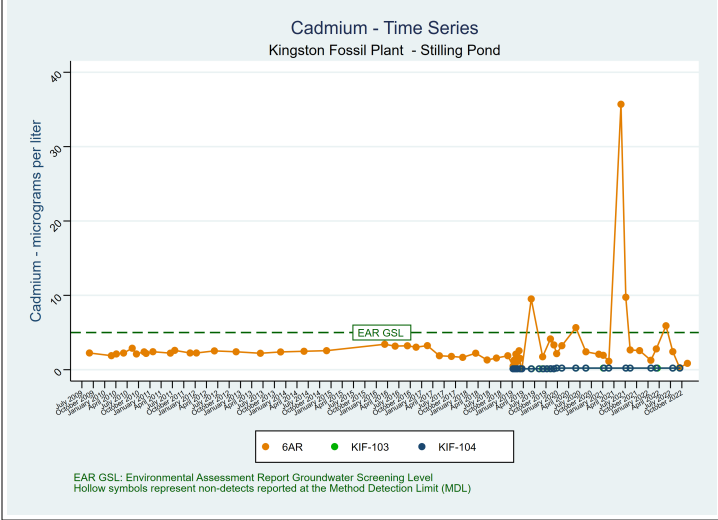
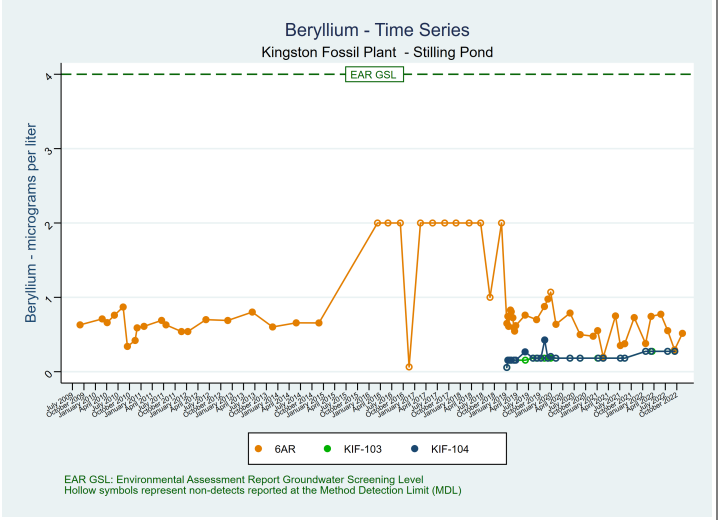
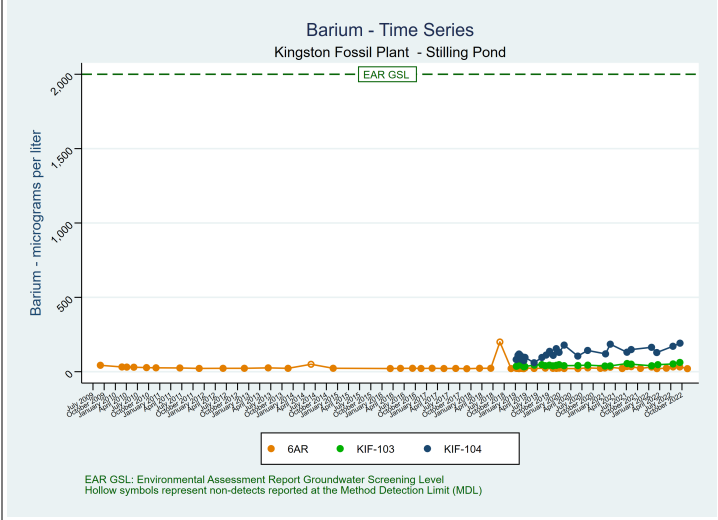
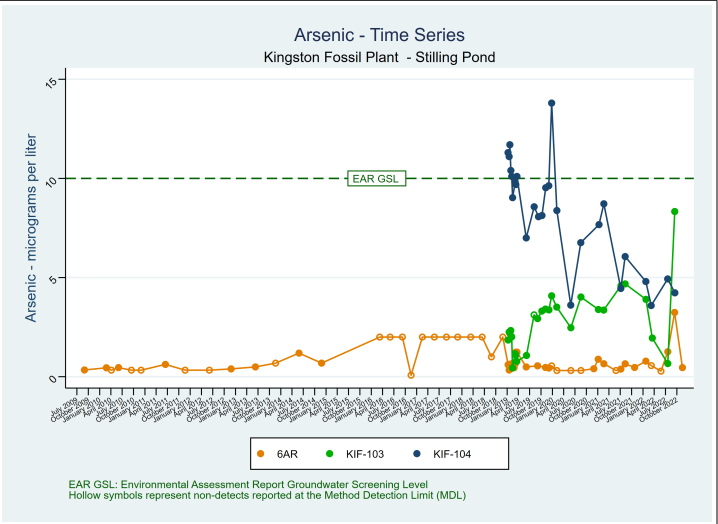
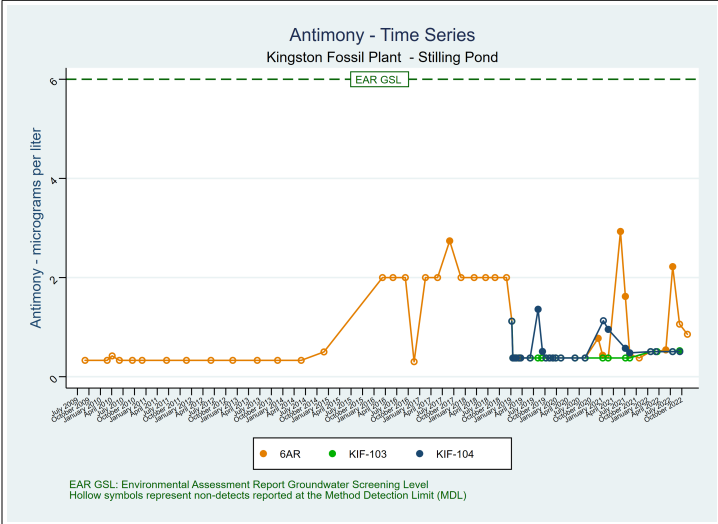
Total Dissolved Solids - Time Series  
Kingston Fossil Plant - Stilling Pond



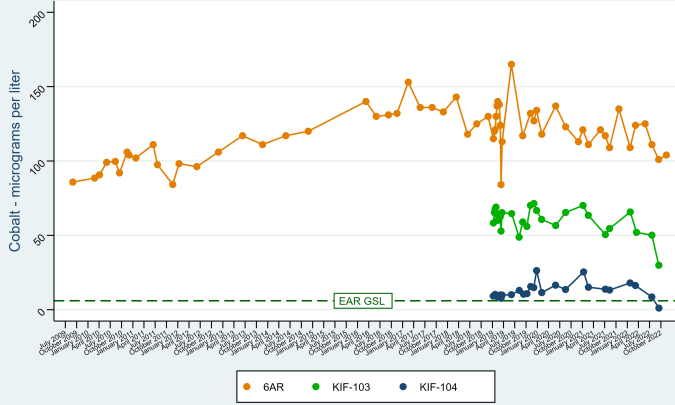
EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

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Time Series Plots  
 Stilling Pond Wells  
 CCR Rule Appendix IV Parameters  
 Kingston Fossil Plant - Harriman, Tennessee

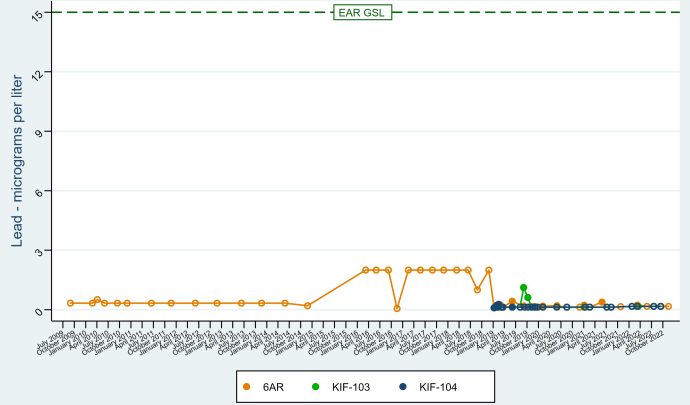


Cobalt - Time Series  
Kingston Fossil Plant - Stilling Pond



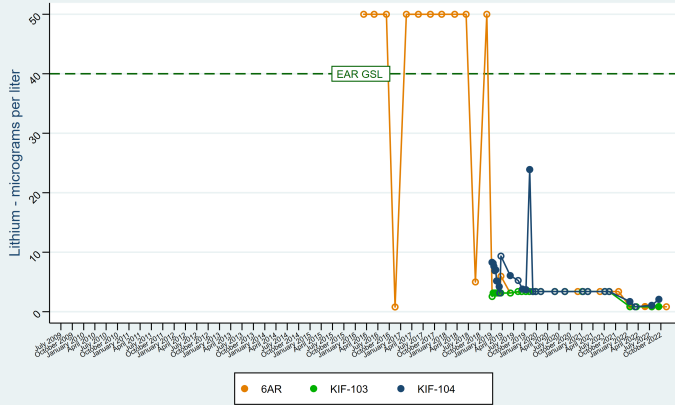
EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

Lead - Time Series  
Kingston Fossil Plant - Stilling Pond



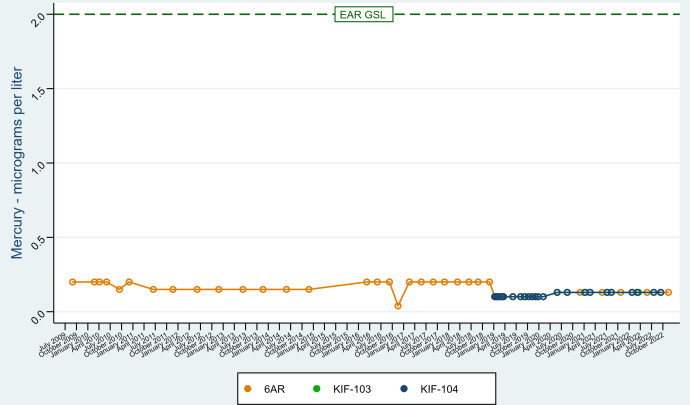
EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

Lithium - Time Series  
Kingston Fossil Plant - Stilling Pond



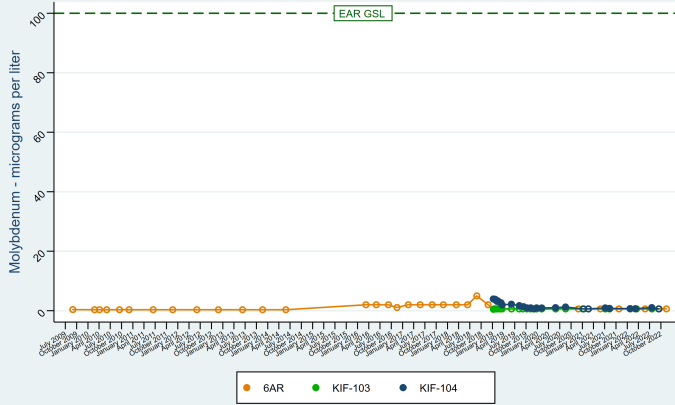
EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

Mercury - Time Series  
Kingston Fossil Plant - Stilling Pond



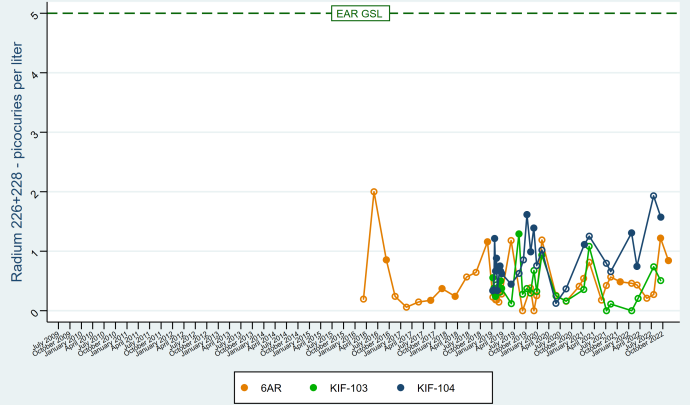
EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

Molybdenum - Time Series  
Kingston Fossil Plant - Stilling Pond



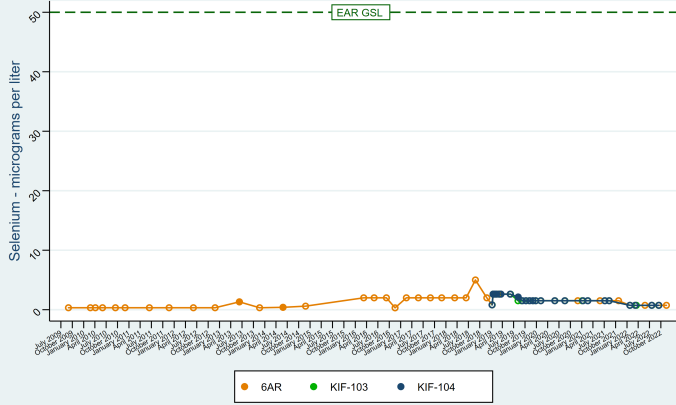
EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

Radium 226+228 - Time Series  
Kingston Fossil Plant - Stilling Pond



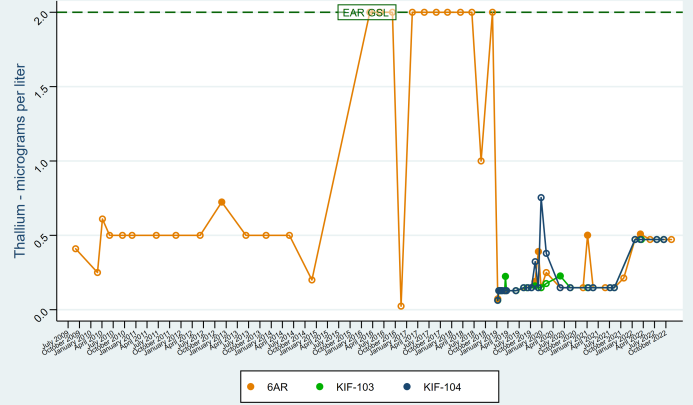
EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

Selenium - Time Series  
Kingston Fossil Plant - Stilling Pond



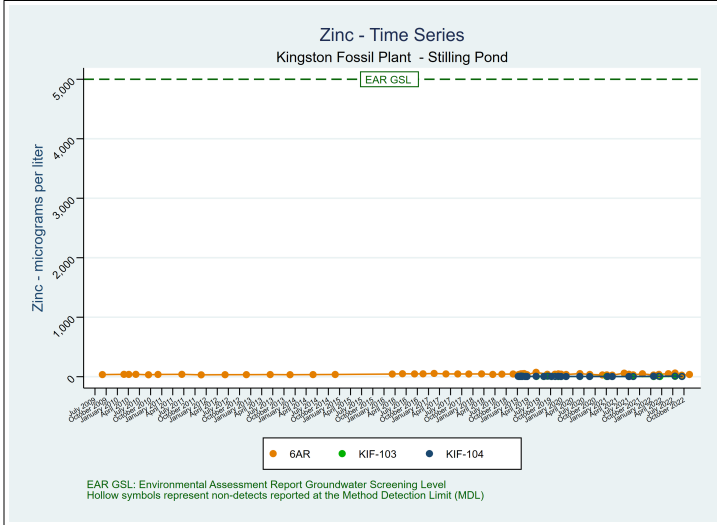
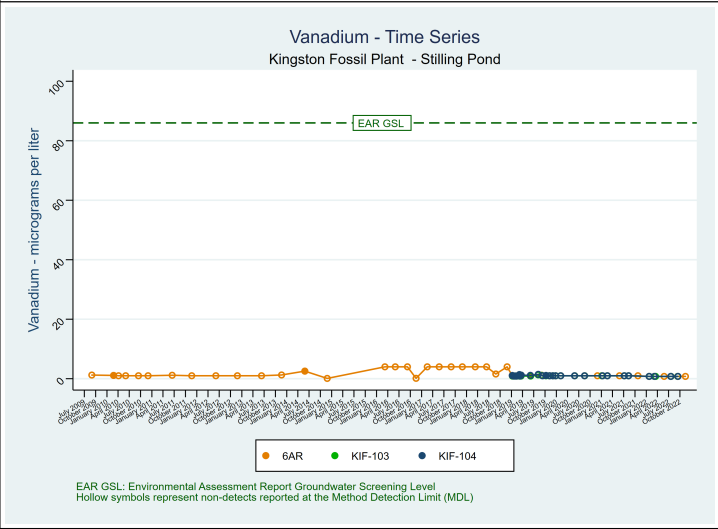
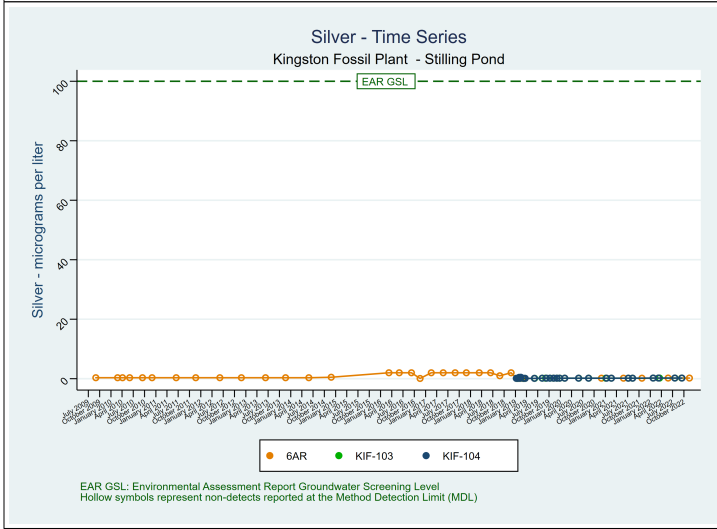
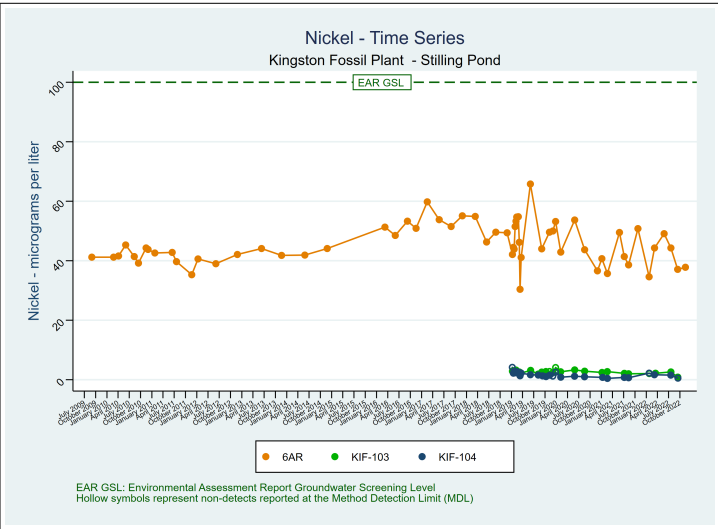
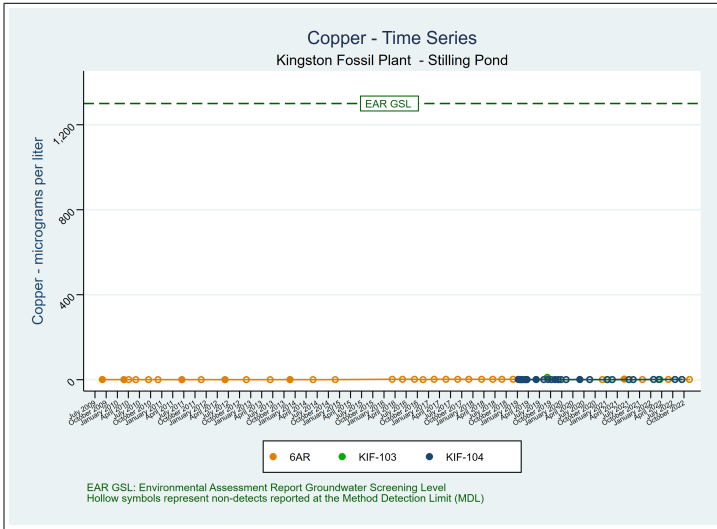
EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

Thallium - Time Series  
Kingston Fossil Plant - Stilling Pond



EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

Time Series Plots  
 Stilling Pond Wells  
 TDEC Appendix I Parameters  
 Kingston Fossil Plant - Harriman, Tennessee



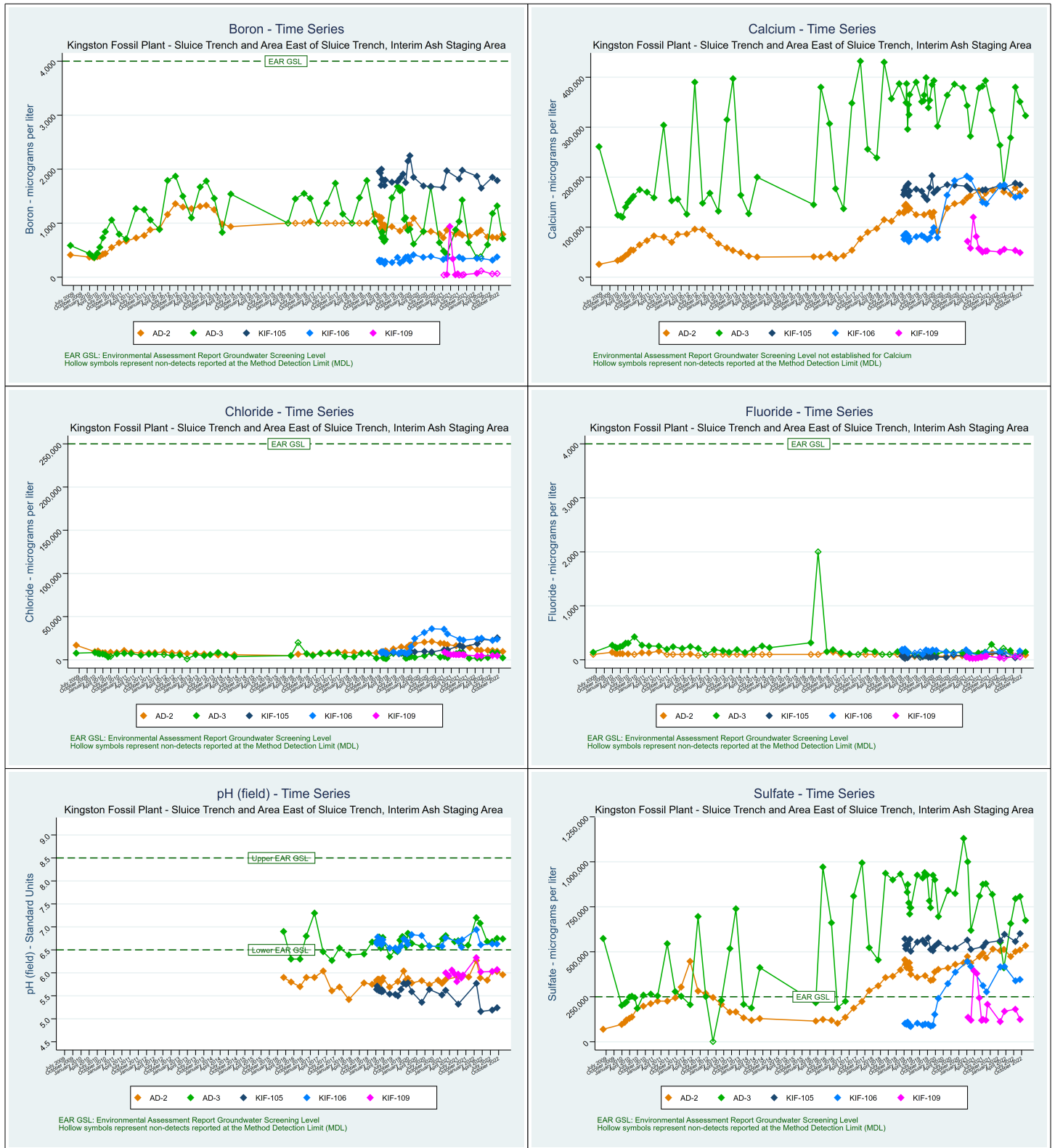
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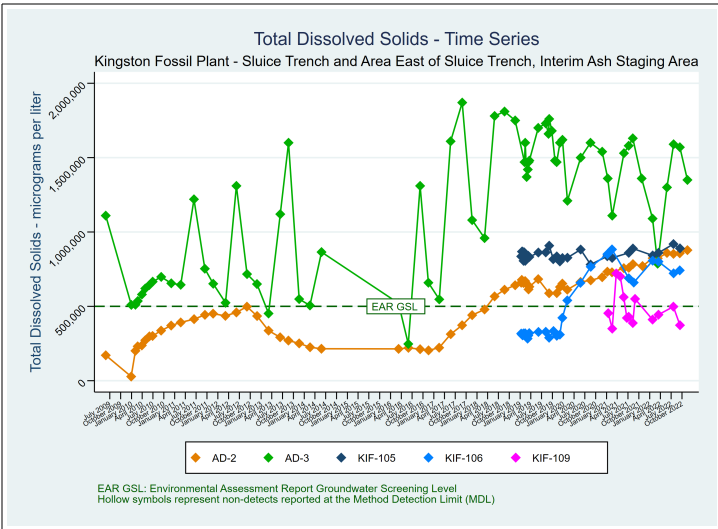
## Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area Wells

### CCR Rule Appendix III Parameters

#### Kingston Fossil Plant - Harriman, Tennessee



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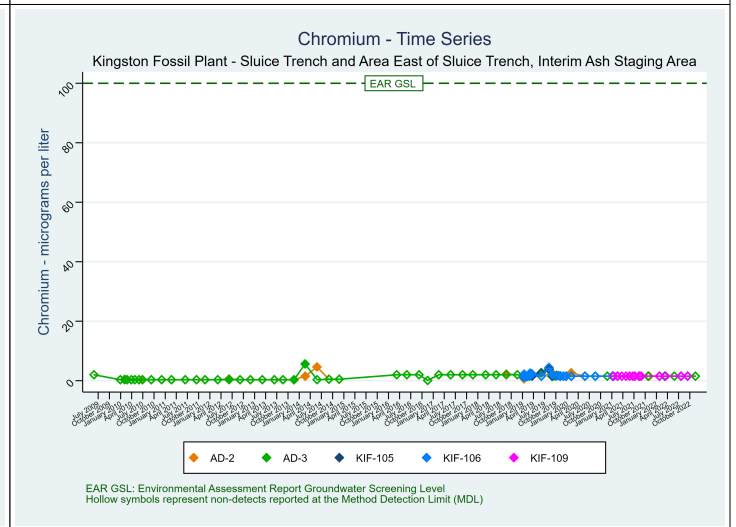
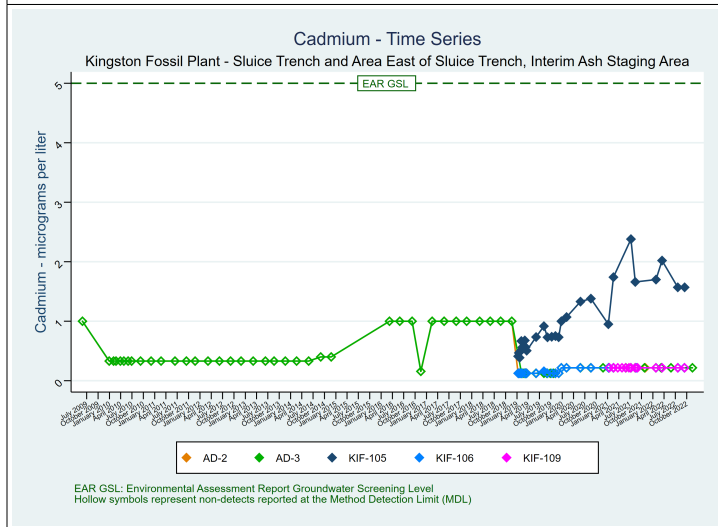
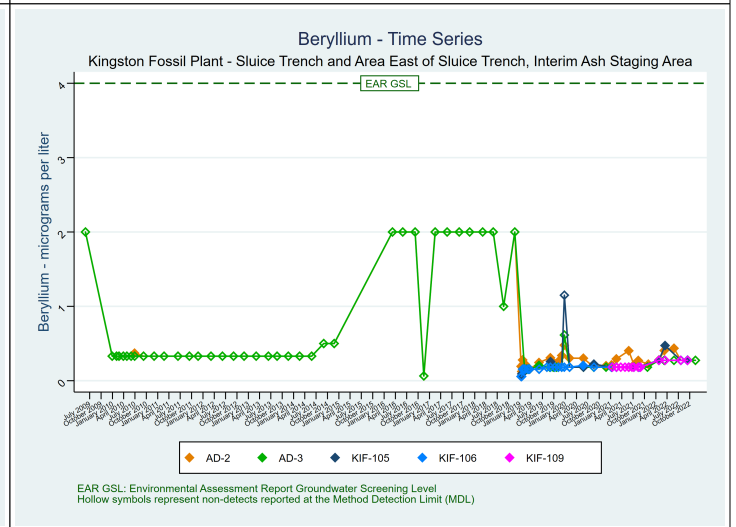
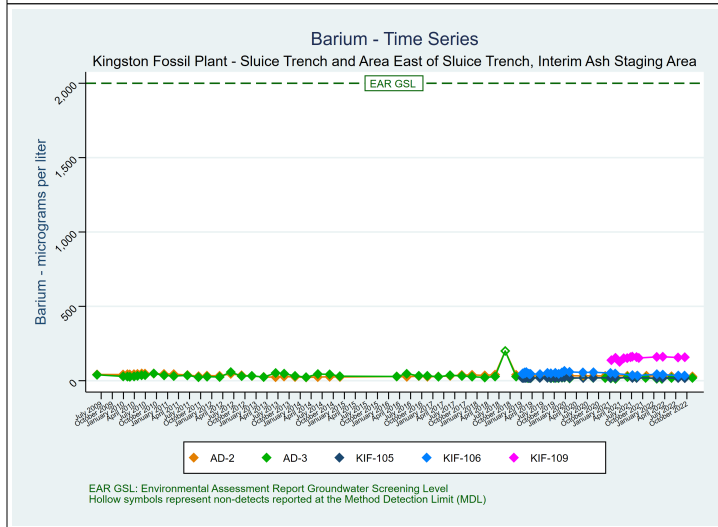
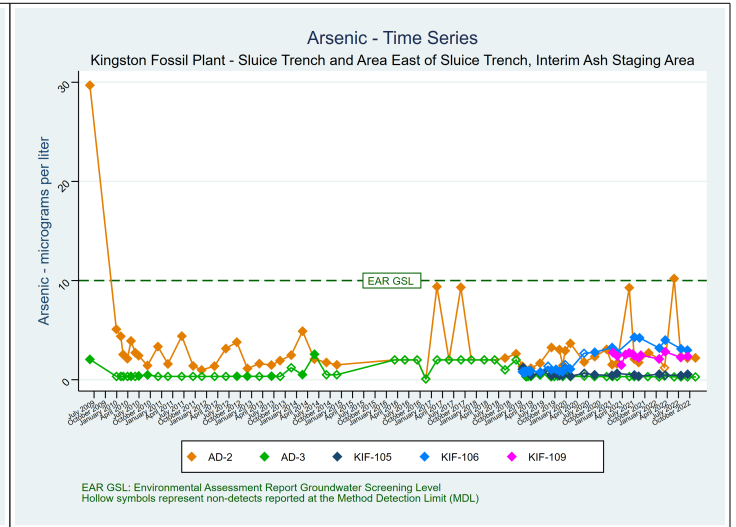
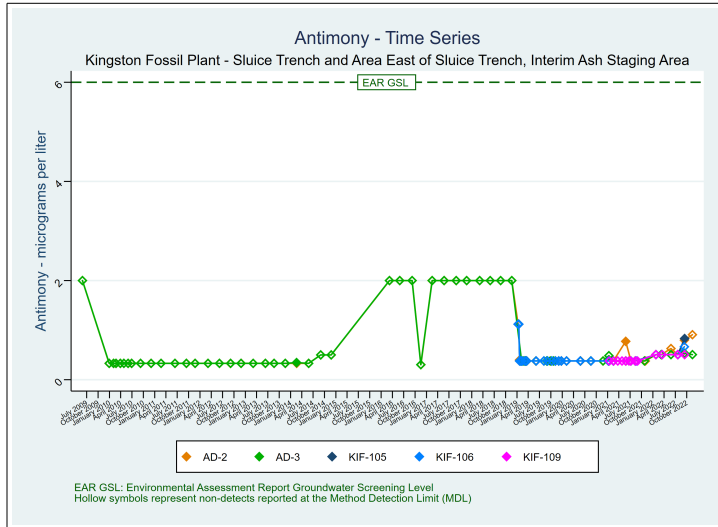


# Time Series Plots

## Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area Wells

### CCR Rule Appendix IV Parameters

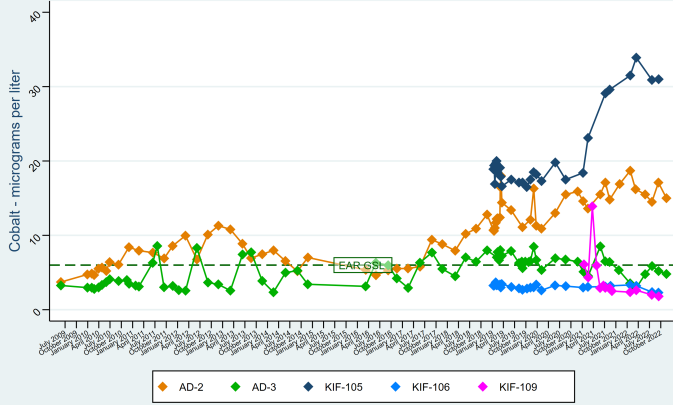
#### Kingston Fossil Plant - Harriman, Tennessee





### Cobalt - Time Series

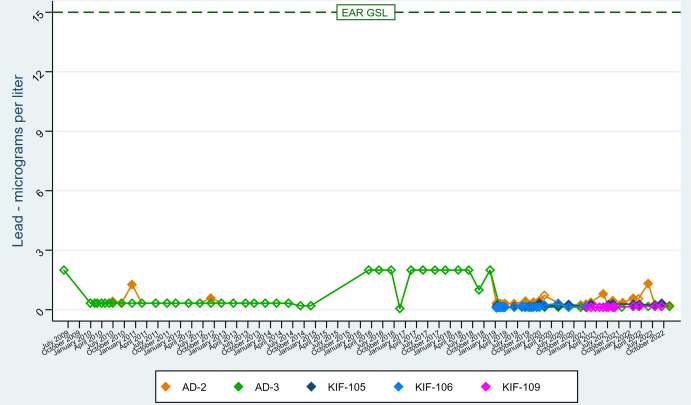
Kingston Fossil Plant - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

### Lead - Time Series

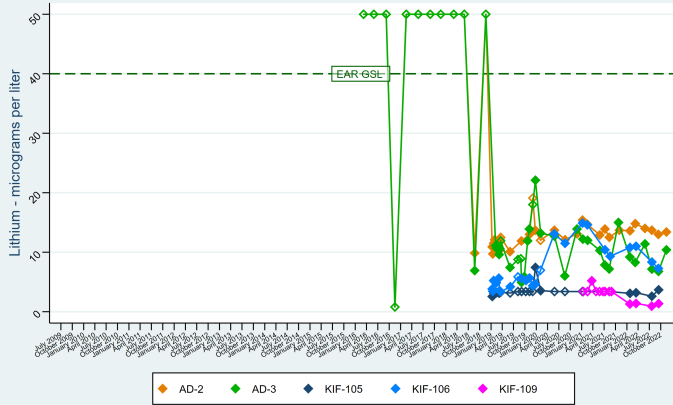
Kingston Fossil Plant - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

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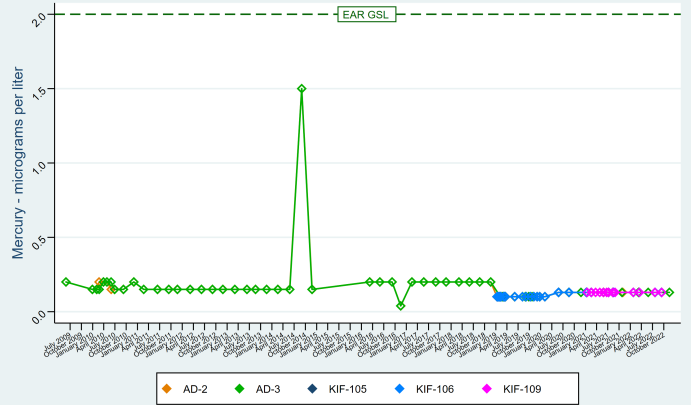
Kingston Fossil Plant - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

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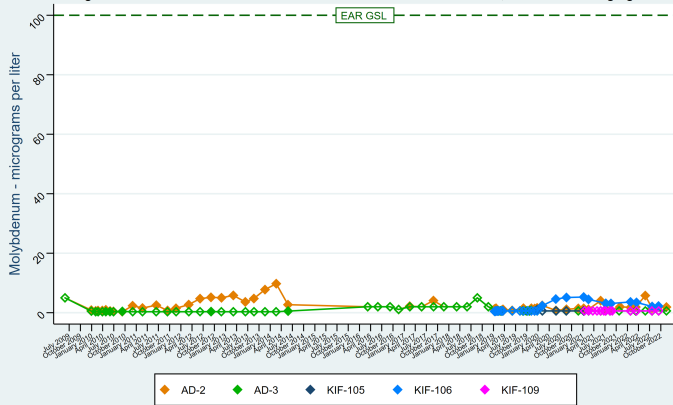
Kingston Fossil Plant - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

### Molybdenum - Time Series

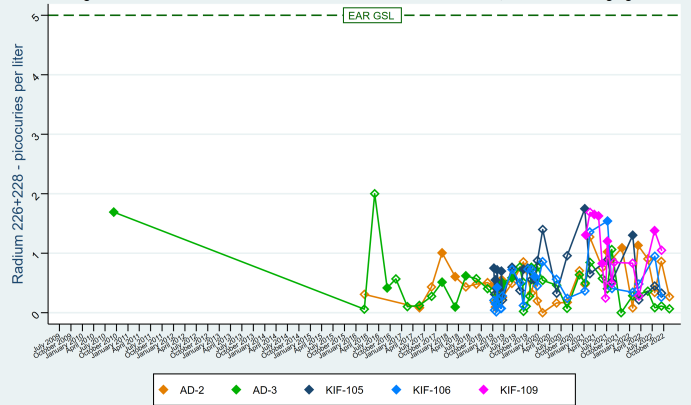
Kingston Fossil Plant - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

### Radium 226+228 - Time Series

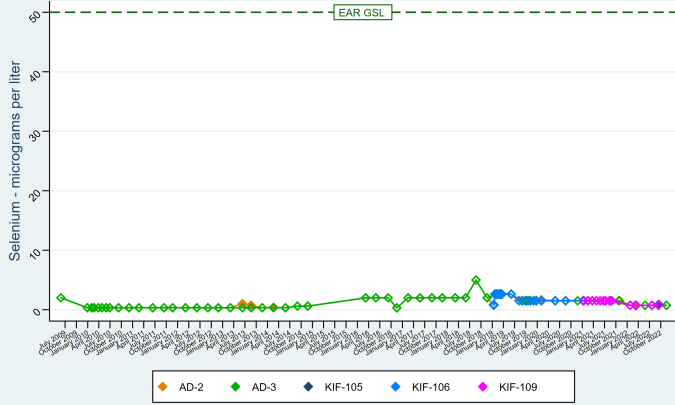
Kingston Fossil Plant - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

### Selenium - Time Series

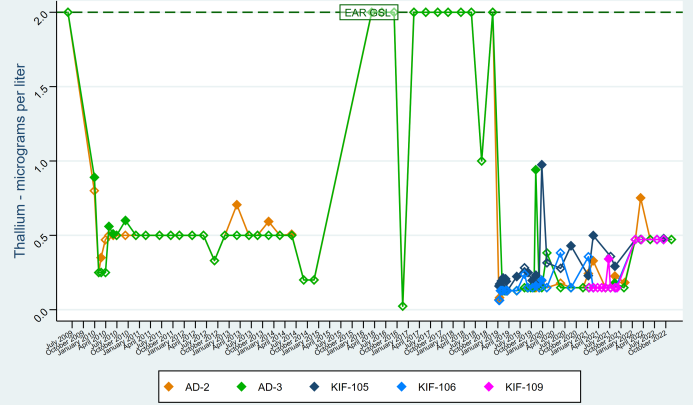
Kingston Fossil Plant - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

### Thallium - Time Series

Kingston Fossil Plant - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



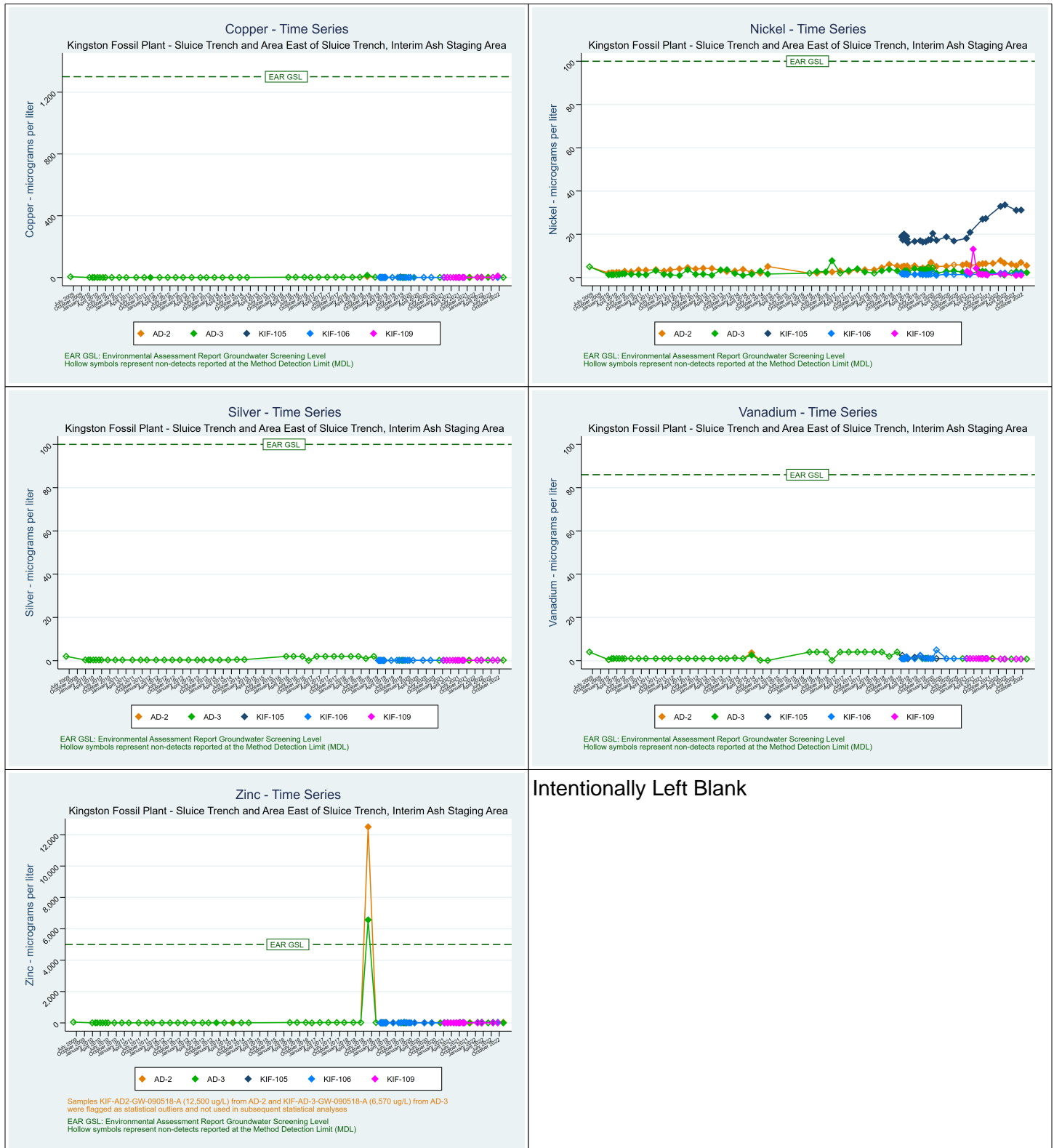
EAR GSL: Environmental Assessment Report Groundwater Screening Level  
Hollow symbols represent non-detects reported at the Method Detection Limit (MDL)

# Time Series Plots

## Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area Wells

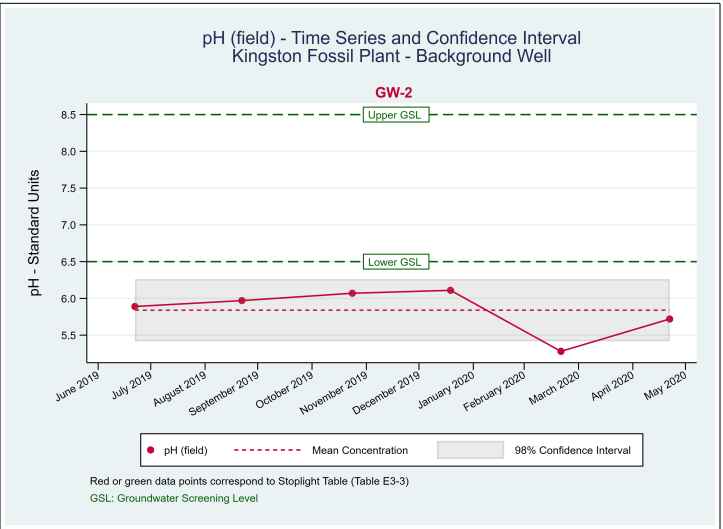
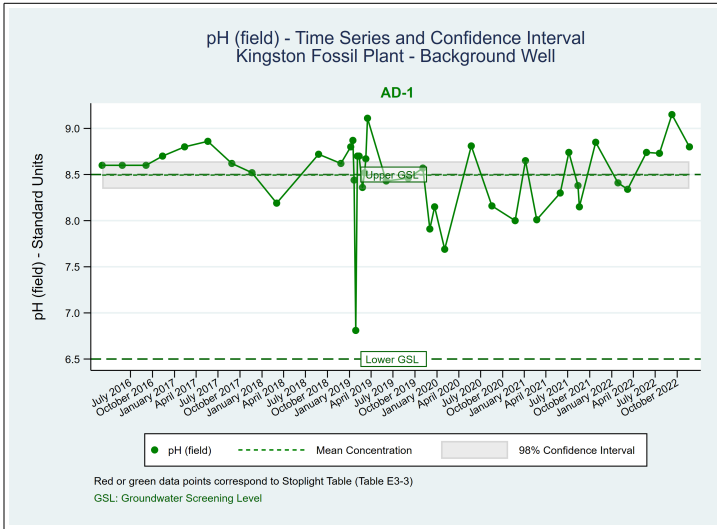
### TDEC Appendix I Parameters

#### Kingston Fossil Plant - Harriman, Tennessee

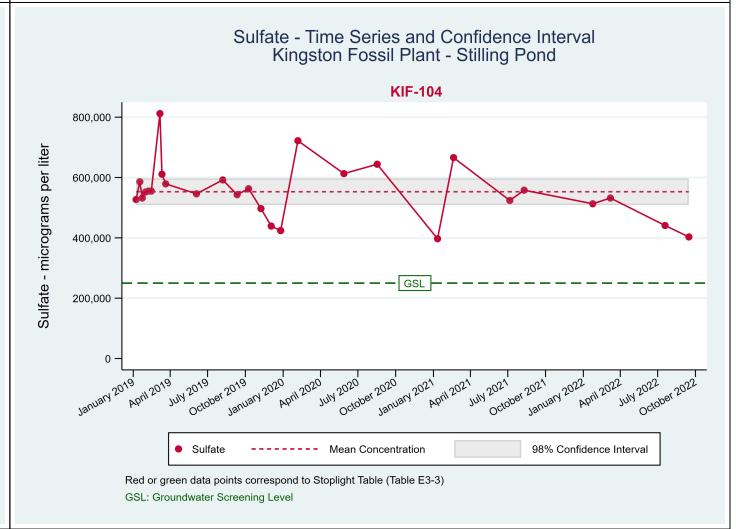
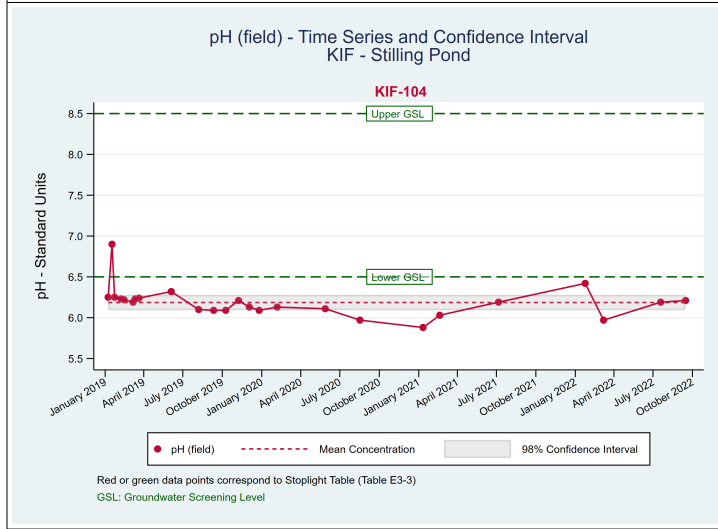
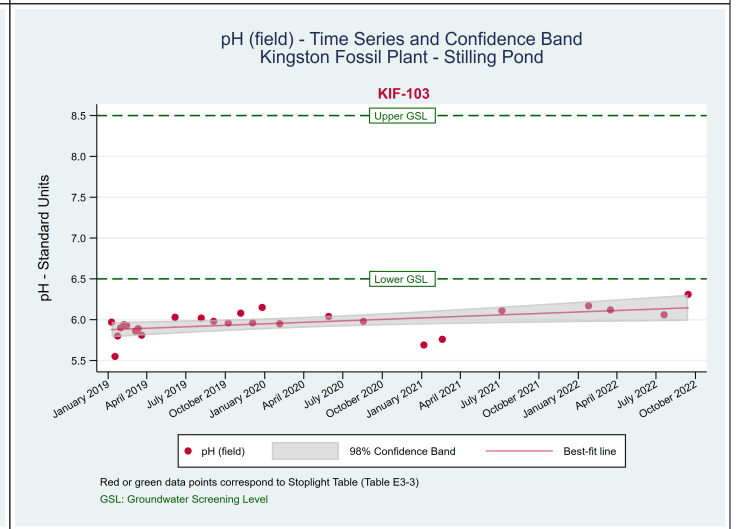
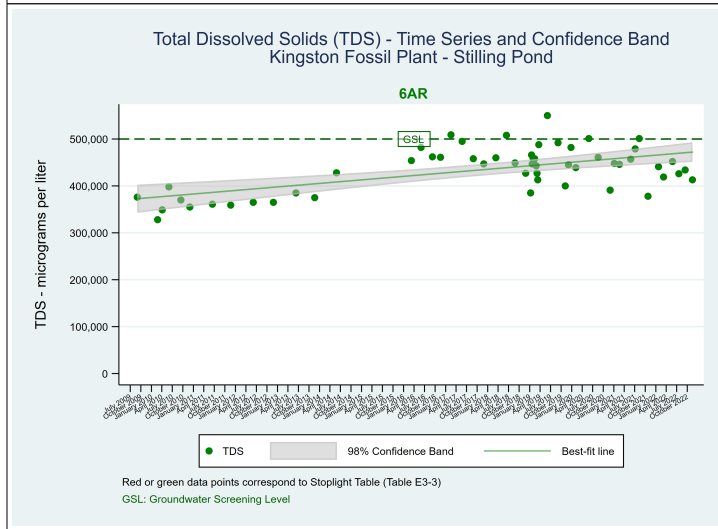
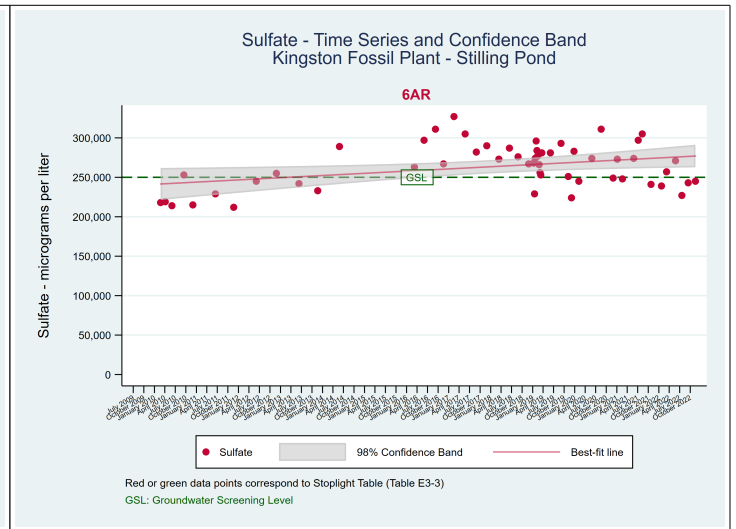
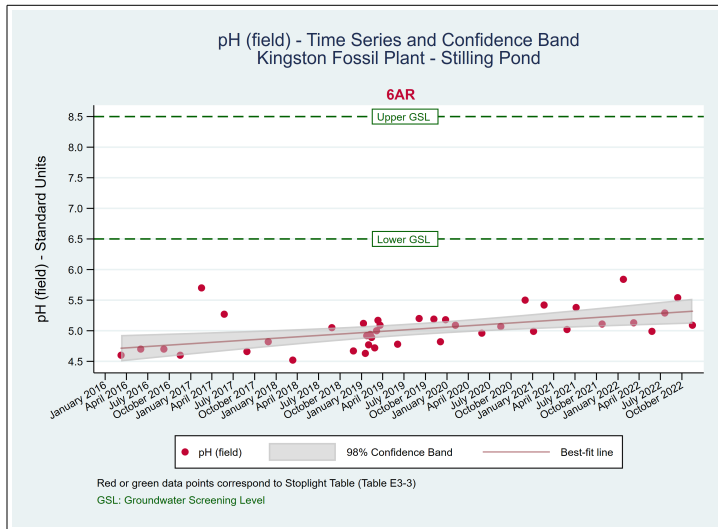


**ATTACHMENT E.3-D  
LINEAR REGRESSION PLOTS**

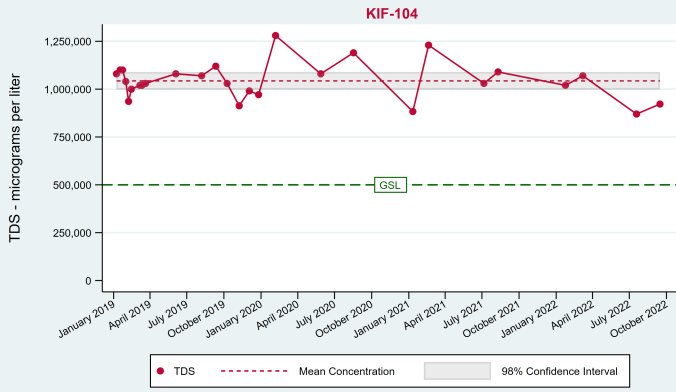
Regression Plots  
 Background Wells  
 CCR Rule Appendix III Parameters  
 Kingston Fossil Plant - Harriman, Tennessee



Regression Plots  
 Stilling Pond Wells  
 CCR Rule Appendix III Parameters  
 Kingston Fossil Plant - Harriman, Tennessee



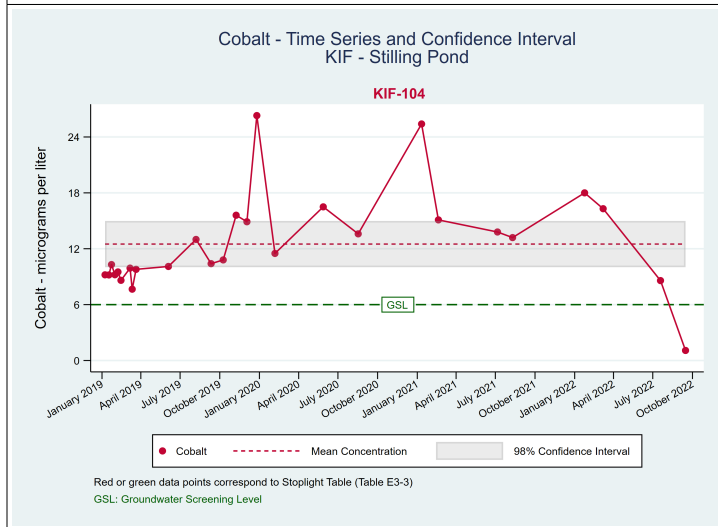
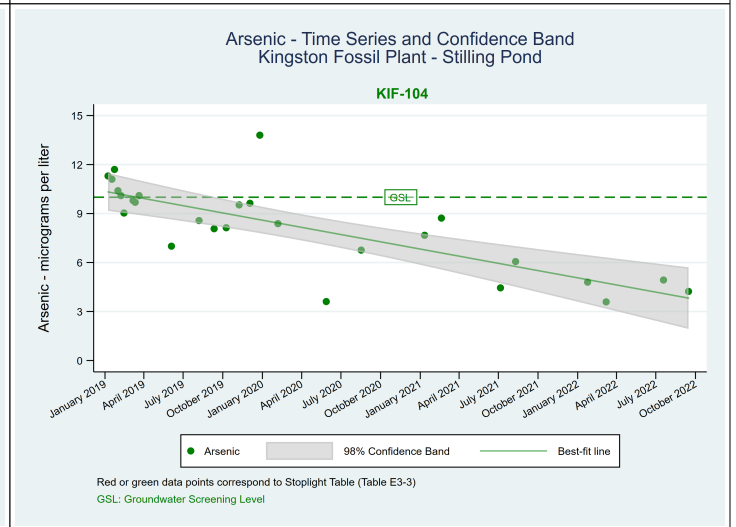
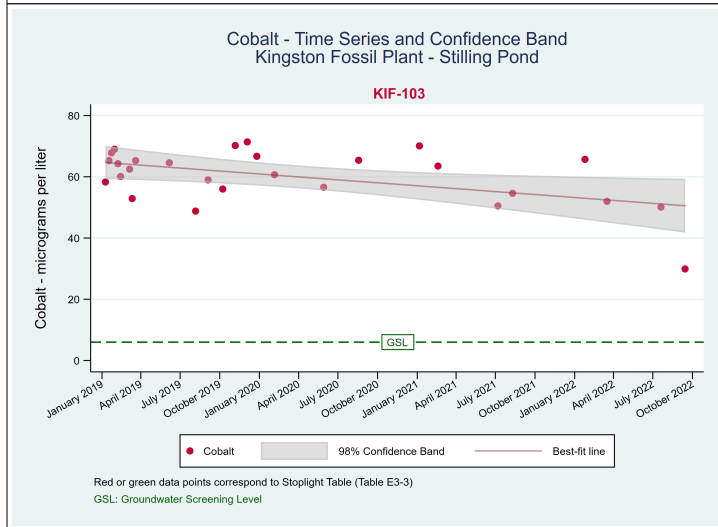
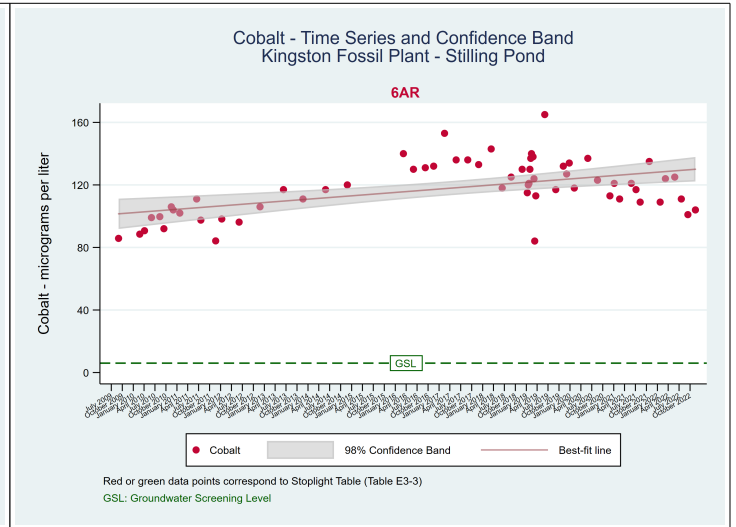
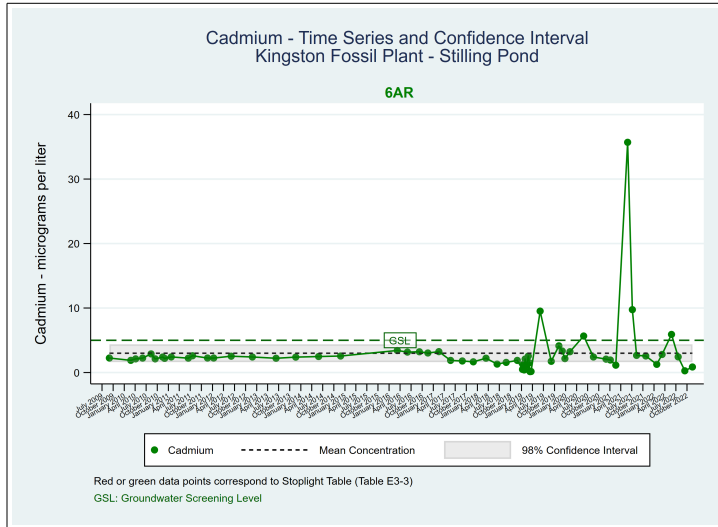
Total Dissolved Solids (TDS) - Time Series and Confidence Interval  
Kingston Fossil Plant - Stilling Pond



Red or green data points correspond to Stoplight Table (Table E3-3)  
GSL: Groundwater Screening Level

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Regression Plots  
 Stilling Pond Wells  
 CCR Rule Appendix IV Parameters  
 Kingston Fossil Plant - Harriman, Tennessee



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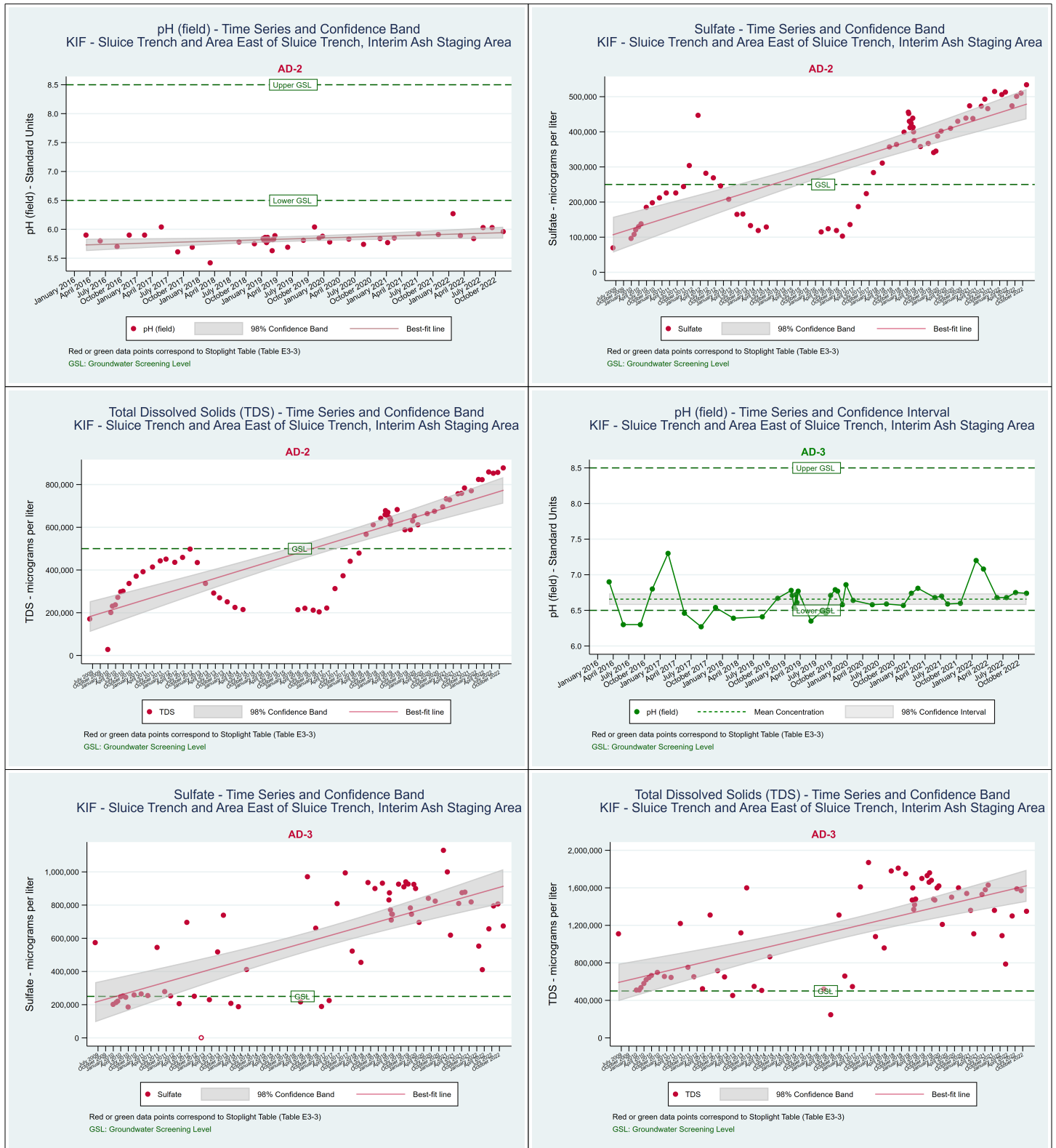


# Regression Plots

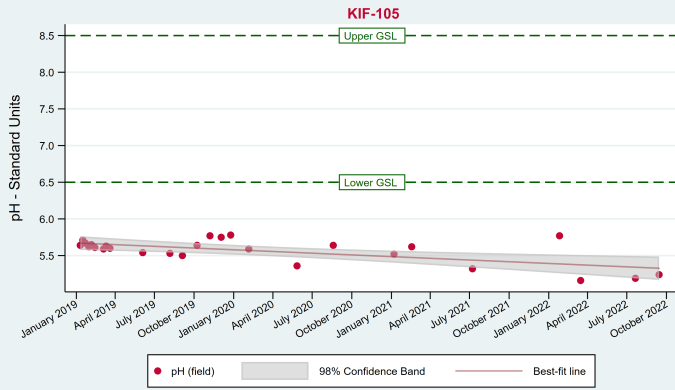
## Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area Wells

### CCR Rule Appendix III Parameters

#### Kingston Fossil Plant - Harriman, Tennessee

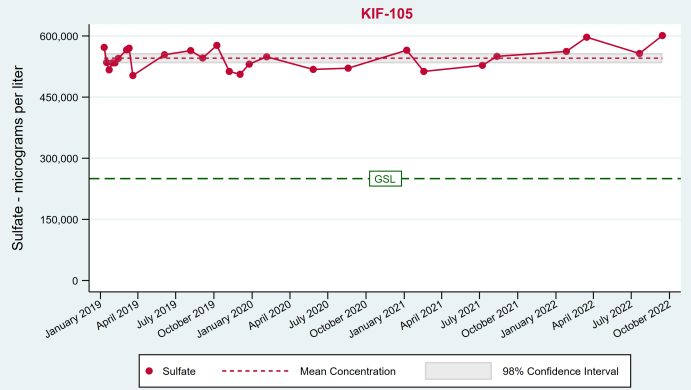


pH (field) - Time Series and Confidence Band  
KIF - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



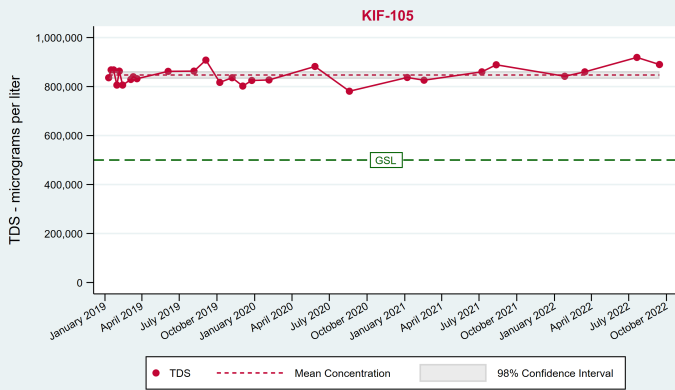
Red or green data points correspond to Stoplight Table (Table E3-3)  
GSL: Groundwater Screening Level

Sulfate - Time Series and Confidence Interval  
KIF - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



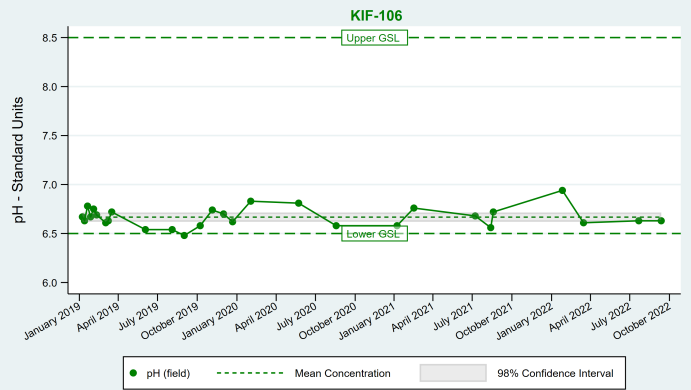
Red or green data points correspond to Stoplight Table (Table E3-3)  
GSL: Groundwater Screening Level

Total Dissolved Solids (TDS) - Time Series and Confidence Interval  
KIF - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



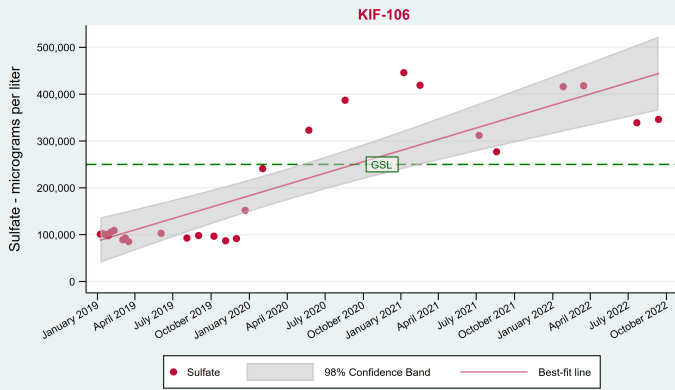
Red or green data points correspond to Stoplight Table (Table E3-3)  
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pH (field) - Time Series and Confidence Interval  
KIF - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



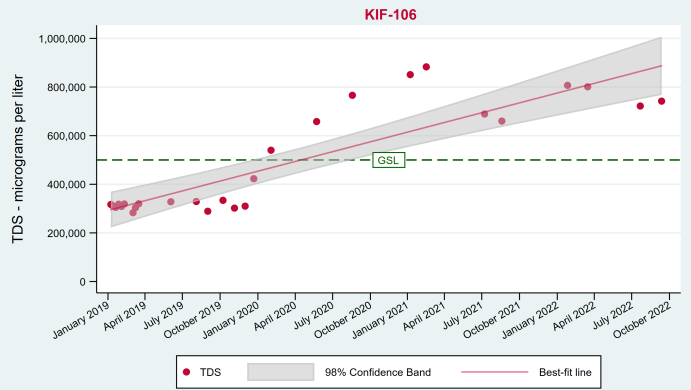
Red or green data points correspond to Stoplight Table (Table E3-3)  
GSL: Groundwater Screening Level

Sulfate - Time Series and Confidence Band  
KIF - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



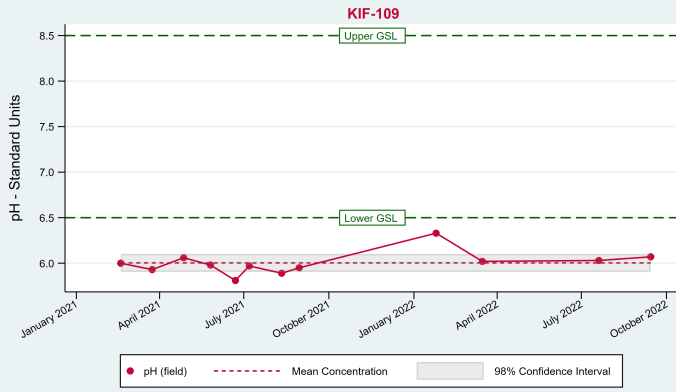
Red or green data points correspond to Stoplight Table (Table E3-3)  
GSL: Groundwater Screening Level

Total Dissolved Solids (TDS) - Time Series and Confidence Band  
KIF - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



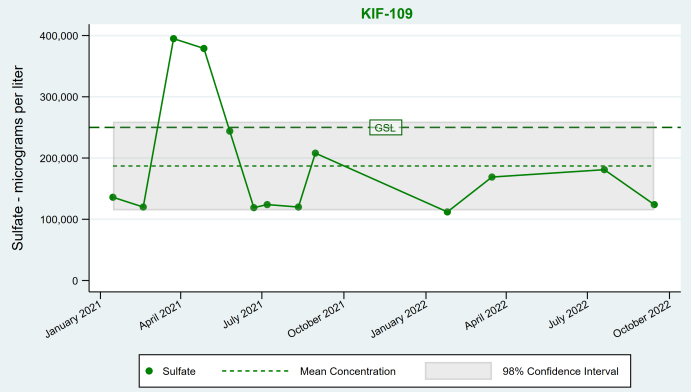
Red or green data points correspond to Stoplight Table (Table E3-3)  
GSL: Groundwater Screening Level

pH (field) - Time Series and Confidence Interval  
 KIF - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



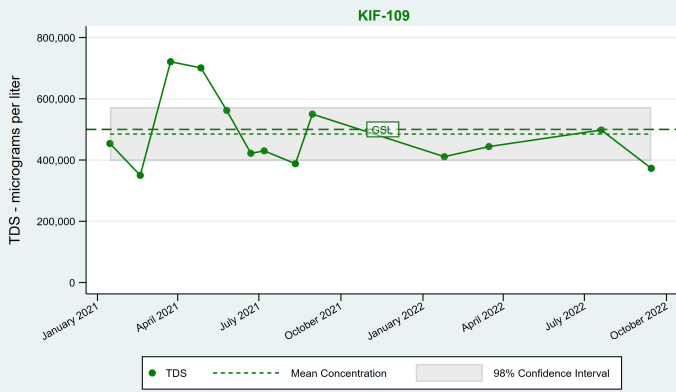
Red or green data points correspond to Stoplight Table (Table E3-3)  
 GSL: Groundwater Screening Level

Sulfate - Time Series and Confidence Interval  
 KIF - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



Red or green data points correspond to Stoplight Table (Table E3-3)  
 GSL: Groundwater Screening Level

TDS - Time Series and Confidence Interval  
 KIF - Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area



Red or green data points correspond to Stoplight Table (Table E3-3)  
 GSL: Groundwater Screening Level

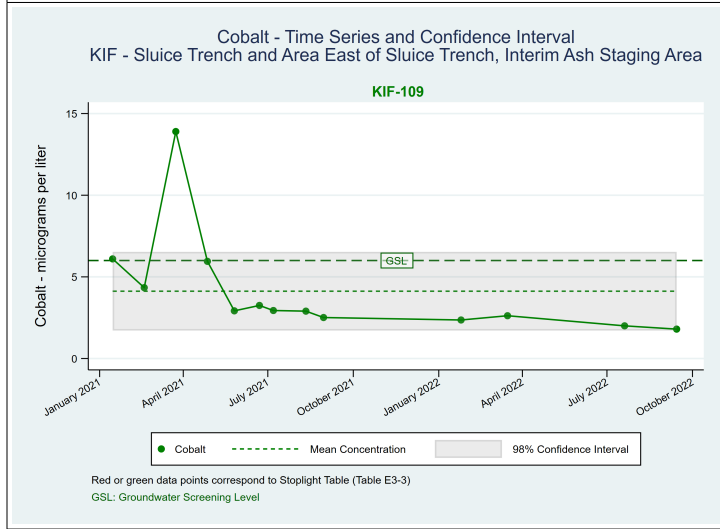
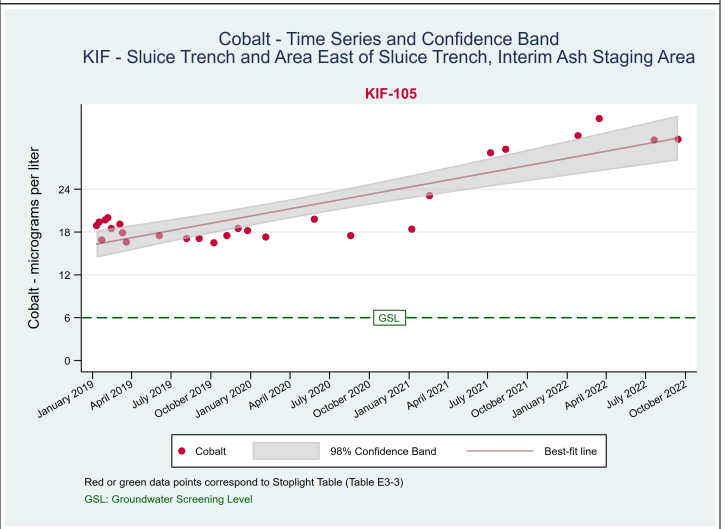
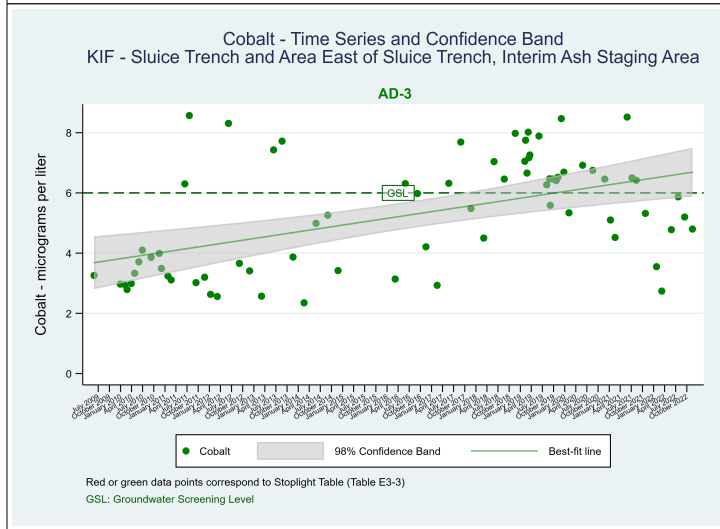
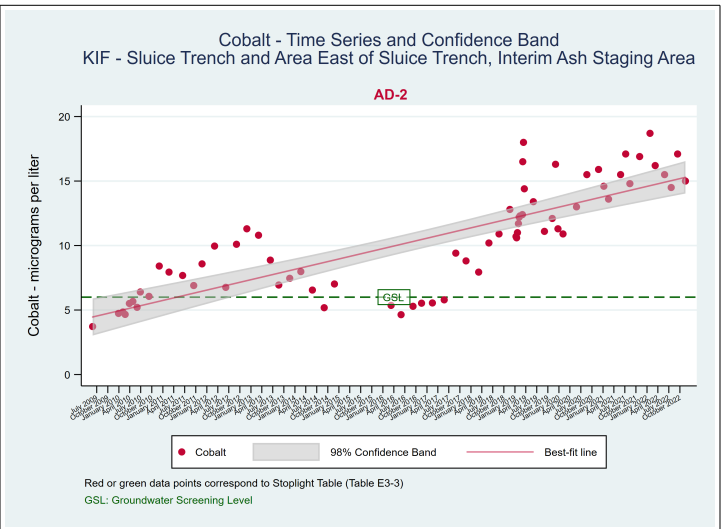
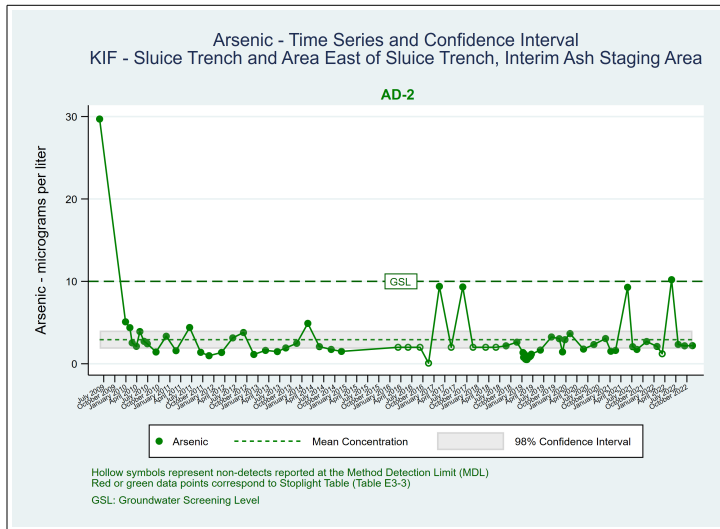
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# Regression Plots

## Sluice Trench and Area East of Sluice Trench, Interim Ash Staging Area Wells

### CCR Rule Appendix IV Parameters

#### Kingston Fossil Plant - Harriman, Tennessee



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**ATTACHMENT E.3-E  
LINEAR REGRESSION RESULTS**

**Attachment E.3-E - Linear Regression Results**  
**Groundwater Investigation - Kingston Fossil Plant - Harriman, Tennessee**

Well	Constituent Type	Constituent	p-value	Trend summary <sup>1</sup>
AD-1	CCR Rule Appendix III Parameters	pH	0.7739	No trend detected
GW-2	CCR Rule Appendix III Parameters	pH	0.3113	No trend detected
6AR	CCR Rule Appendix III Parameters	pH	0.0003	Increasing
		Sulfate	0.0063	Increasing
		Total Dissolved Solids	<0.0001	Increasing
	CCR Rule Appendix IV Parameters	Cadmium	0.2433	No trend detected
		Cobalt	<0.0001	Increasing
KIF-103	CCR Rule Appendix III Parameters	pH	0.0047	Increasing
	CCR Rule Appendix IV Parameters	Cobalt	0.0065	Decreasing
KIF-104	CCR Rule Appendix III Parameters	pH	0.1734	No trend detected
		Sulfate	0.0614	No trend detected
		Total Dissolved Solids	0.395	No trend detected
	CCR Rule Appendix IV Parameters	Arsenic	<0.0001	Decreasing
		Cobalt	0.3969	No trend detected
AD-2	CCR Rule Appendix III Parameters	pH	0.0086	Increasing
		Sulfate	<0.0001	Increasing
		Total Dissolved Solids	<0.0001	Increasing
	CCR Rule Appendix IV Parameters	Arsenic	0.1271	No trend detected
		Cobalt	<0.0001	Increasing
AD-3	CCR Rule Appendix III Parameters	pH	0.072	No trend detected
		Sulfate	<0.0001	Increasing
	CCR Rule Appendix IV Parameters	Total Dissolved Solids	<0.0001	Increasing
		Cobalt	<0.0001	Increasing
KIF-105	CCR Rule Appendix III Parameters	pH	0.0005	Decreasing
		Sulfate	0.08	No trend detected
		Total Dissolved Solids	0.0579	No trend detected
	CCR Rule Appendix IV Parameters	Cobalt	<0.0001	Increasing
KIF-106	CCR Rule Appendix III Parameters	pH	0.6825	No trend detected
		Sulfate	<0.0001	Increasing
		Total Dissolved Solids	<0.0001	Increasing
KIF-109	CCR Rule Appendix III Parameters	pH	0.1758	No trend detected
		Sulfate	0.3135	No trend detected
		Total Dissolved Solids	0.2954	No trend detected
	CCR Rule Appendix IV Parameters	Cobalt	0.0535	No trend detected

**Notes:**

CCR Rule - Title 40, Code of Federal Regulations, Part 257

1. Trend evaluated using linear regression. Regression considered significant when  $p < 0.05$ .
2. Fluoride is both a CCR Rule Appendix III and CCR Rule Appendix IV constituent. In this table, fluoride has been grouped with the Appendix III constituents only to avoid duplication of results.

**APPENDIX E.4**  
**STATISTICAL ANALYSIS OF WATER QUALITY**  
**PARAMETERS**

**Originally Published as Appendix D of the**  
**Seep Sampling and Analysis Report**



## **Appendix D – Statistical Analysis of Water Quality Parameters**

Kingston Fossil Plant  
Seep Investigation

June 17, 2020

Prepared for:

Tennessee Valley Authority  
Chattanooga, Tennessee



Prepared by:

Stantec Consulting Services Inc.  
Lexington, Kentucky



## APPENDIX D – STATISTICAL ANALYSIS OF WATER QUALITY PARAMETERS

### Revision Record

Revision	Description	Author		Quality Check		Independent Review	
0	Initial draft	Chris LaLonde	10/10/2019	Melissa Aslund	10/18/2019	Carole Farr	3/26/2020



## Sign-off Sheet

This document entitled Appendix D – Statistical Analysis of Water Quality Parameters was prepared by Stantec Consulting Services Inc. (“Stantec”) for the account of Tennessee Valley Authority (the “Client”). Any reliance on this document by any third party is strictly prohibited. The material in it reflects Stantec’s professional judgment in light of the scope, schedule and other limitations stated in the document and in the contract between Stantec and the Client. The opinions in the document are based on conditions and information existing at the time the document was published and do not take into account any subsequent changes. In preparing the document, Stantec did not verify information supplied to it by others. Any use which a third party makes of this document is the responsibility of such third party. Such third party agrees that Stantec shall not be responsible for costs or damages of any kind, if any, suffered by it or any other third party as a result of decisions made or actions taken based on this document.

Prepared by   
**Chris LaLonde, Associate Senior Statistician/Risk Assessor**

Reviewed by   
**Melissa Whitfield Aslund, Environmental Scientist**

Approved by   
**Carole Farr, Senior Principal Geologist**



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## APPENDIX D – STATISTICAL ANALYSIS OF WATER QUALITY PARAMETERS

### Abbreviations

AOC	Area of Concern
AOI	Area of Interest
CCR	Coal Combustion Residuals
DO	Dissolved Oxygen
KIF	Kingston Fossil Plant
M/AOC#2	Historic seep M/AOC#3
SAP	Sampling and Analysis Plan
SAR	Sampling and Analysis Report
Stantec	Stantec Consulting Services Inc.
USEPA	United States Environmental Protection Agency
UTL	Upper Tolerance Level



## APPENDIX D – STATISTICAL ANALYSIS OF WATER QUALITY PARAMETERS

June 17, 2020

### 1.0 INTRODUCTION

A statistical analysis of water quality parameter data collected in Emory River adjacent to the Kingston Fossil Plant (KIF Plant) was conducted as part of the seep investigation. The statistical analysis was used to evaluate whether there are statistically significant differences between monitoring results collected “adjacent to” and “upstream of” historical seep/Areas of Concern (AOC) locations and between intermediate and upstream control areas. This appendix to the KIF Plant seep investigation sampling and analysis report (SAR) presents the statistical approach and methods used for this analysis and the analysis results.

### 2.0 OBJECTIVE

The objective of the statistical analysis is to identify statistically significant differences between water quality parameter results measured “adjacent” to inaccessible historical seep/AOC locations and results measured “upstream” of those locations. As described in Section 3.2.1 of this SAR, four historical seep/AOC locations were identified and targeted for monitoring at the KIF Plant for the seep investigation.

An Area of Interest (AOI) is identified when statistically significant evidence indicates that: 1) water quality parameter results collected “adjacent” to historical seep/AOC locations are different than water quality parameter results collected “upstream” of historical seep locations/AOC for all four parameters, or 2) intermediate areas differ significantly from upstream control areas for all four parameters.

### 3.0 DATASETS

In accordance with the Seep Sampling and Analysis Plan (SAP), datasets were generated consisting of water quality parameter measurements for each of the four field parameters for each historical seepage location/AOC identified by Tennessee Valley Authority for evaluation. The data used in the statistical analysis were obtained in spreadsheet format from the “*Seep Investigation/ Surface Stream Field Parameter Measurement Forms*”, which were prepared in real time as the field investigation was being conducted. Statistical datasets were established based on proximity to individual or combined historical seep/AOC locations. A summary of the measurement location identifications and the number of measurements is provided in Table D.1.

In addition to the measurements associated with each of the four historical seep/AOC locations, measurements were also collected in intermediate areas between these locations. The distance between these measurements was typically 200 feet. Overall, this resulted in the collection of a total of 17 intermediate measurements, collected over five intermediate areas (Exhibit A.1; Appendix A).



## APPENDIX D – STATISTICAL ANALYSIS OF WATER QUALITY PARAMETERS

June 17, 2020

Finally, data were also collected from two "upstream control areas" and placed into two groups for evaluation: UC24 (measurements collected on April 24, 2019) includes upstream control locations KIF-UC-98 through KIF-UC-117, and UC25 (measurements collected on April 25, 2019) includes upstream control measurement locations KIF-UC-153 through KIF-UC-172 (Exhibit A.1; Appendix A). A total of 20 measurements were collected from each "upstream control area". The distance between these measurements was approximately five feet.

Measurements collected from the intermediate areas were combined by location and compared statistically to measurements collected from the upstream control areas to identify statistically significant differences between each of the four parameters.

### 4.0 STATISTICAL ANALYSIS METHODS

In accordance with the Seep SAP, the following statistical analysis methods were used to evaluate the water quality parameter measurement results:

- Formal hypothesis testing was used to identify statistically significant differences between adjacent and upstream monitoring data for historic seep/AOC locations by comparison of mean parameter concentrations between the datasets; and
- Formal hypothesis testing was used to identify statistically significant differences between intermediate area data and control area data for intermediate area locations. Tolerance interval methods were utilized to assess differences between monitoring data collected in intermediate areas compared to control area(s).

The statistical analysis was conducted in three phases: 1) exploratory data analysis/outlier screening, 2) testing of statistical assumptions, and 3) formal hypothesis testing. These phases are discussed below. Analyses were conducted using United States Environmental Protection Agency (USEPA) ProUCL (version 5.1.002) and STATA Statistics and Data Analysis (version 15.1).

#### 4.1 EXPLORATORY DATA ANALYSIS/OUTLIER SCREENING

Initially, the monitoring data associated with historical seep areas were plotted on time-series graphs and in box plots. Time-series graphs allow for the identification of trends, outliers, and to visually identify differences between water quality parameter measurements that were collected in a downstream to upstream direction. Box plots allow for the identification of outliers and provide a basic sense of the potential underlying statistical distributions. The time-series and box plots are presented in Attachment D.1. In addition to graphical analysis, descriptive statistics were calculated for each water quality parameter for each historical seep/AOC location, intermediate areas, and upstream control areas. A summary of the descriptive statistics is presented in Attachment D.2.



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Following the calculation of descriptive statistics, the data was screened for possible outliers. Outliers are data points that are abnormally high or low as compared to the rest of the measurements and may represent anomalous data and/or data errors. Outliers may also represent natural variation of constituent concentrations in environmental systems. During the seep investigation, water quality parameters were measured at intermediate area locations, upstream control locations and downstream, adjacent and upstream of historical seeps/AOC locations. Utilizing the complete set of data to screen for the presence of outliers allowed for evaluation of potential spatial variation in the natural ecosystem. Screening for outliers is a critical step as outliers can bias the statistical testing results.

Outliers are identified graphically using side by side box plots and time-series graphs (Attachment D.1). Suspect visual outliers were further analyzed to determine if they are extreme outliers. The Tukey's procedure (Tukey, 1977) as outlined in the USEPA document: "*Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities. Unified Guidance*" (USEPA 2009) – (Unified Guidance) was used to identify extreme outliers. The Tukey's procedure is briefly outlined below:

**Lower extreme outlier:** The value is less than: 25<sup>th</sup> percentile – (3 x interquartile range)

or

**Upper extreme outlier:** The value is greater than: 75<sup>th</sup> percentile + (3 x interquartile range)

where:

Interquartile Range = 75<sup>th</sup> percentile value – 25<sup>th</sup> percentile value

If an outlier was identified visually and considered extreme (Tukey's procedure), then formal statistical testing (Dixon's and/or Rosner tests) was conducted to confirm that the data point is a statistically significant outlier. Utilizing the procedures outlined above, no outliers were identified or removed from the analytical dataset.

### 4.2 TEST OF STATISTICAL ASSUMPTIONS

In environmental applications, formal hypothesis testing is commonly used to compare mean values between two "populations". In the case of the investigation of historical seep/AOCs locations at the KIF Plant, the populations can be defined as monitoring results collected **adjacent** to the historical seep/AOC and monitoring results collected immediately **upstream** of the historical seep/AOC location. In the case of the investigation of intermediate areas, the population can be defined as monitoring results collected in the **intermediate areas** and monitoring results collected in the **upstream control areas**.

Two sample t-tests were used to identify statistically significant differences between monitoring data collected adjacent to historical seeps/AOCs and data collected immediately upstream. As with most statistical tests, t-tests must meet statistical assumptions in order to produce reliable statistical conclusions. T-tests have two statistical assumptions: 1) the data "fit" or can be transformed to fit the normal distribution, and 2) the variance of each population being compared are equal (homoscedasticity).



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The assumption of normality was tested visually using Normal Q-Q plots and statistically using the Shapiro-Wilks Test (alpha 0.01). Data for each parameter in adjacent and upstream measurements were normally distributed. Normal Q-Q plots are presented in Attachment D.3. The assumption of homoscedasticity was tested using the F-Test for the Equality of Two-Variiances. In instances where variances were not equal, the Satterthwaite's degrees of freedom were used to adjust for unequal variances. The results of the evaluation of normality and equality of variances between the upstream and adjacent measurement locations are presented in Table D.2.

### 4.3 FORMAL HYPOTHESIS TESTING

The objective of formal hypothesis testing is to determine whether mean water quality parameter monitoring results for the “adjacent” datasets are statistically different than the results for the “upstream” datasets. Hypothesis tests are standard statistical methods used to decide between two competing alternatives based on available data. Uncertainties arise when sample statistics are used as estimates of “true” but unknown population parameters (mean, standard deviation). Hypothesis testing provides the framework for managing these uncertainties and controlling potential decision errors (Ofungwu, 2014).

Hypothesis tests are set up based on two competing alternatives. The null hypothesis ( $H_0$ ) represents baseline conditions or conditions of no effects/differences. The null hypothesis can be represented mathematically as:

$$H_0: \text{Mean Adjacent} - \text{Mean Upstream} = 0; \text{ or } \text{Mean Adjacent} = \text{Mean Upstream}$$

The alternative hypothesis is simply the opposite of the null hypothesis and can be written as:

$$H_a: \text{Mean Adjacent} - \text{Mean Upstream} \neq 0$$

If there is an *a priori* idea that a parameter's mean may be greater than or less than the upstream mean the alternative hypothesis can be written as:

$$H_a: \text{Mean Adjacent} - \text{Mean Upstream} < 0 \text{ or } \text{Mean Adjacent} - \text{Mean Upstream} > 0$$

The former alternative hypothesis is considered a two-sided test (e.g., it is unknown if the difference will be higher or lower and therefore, need to account for both possibilities). The later alternative hypotheses are considered a one-sided test (e.g., there is *a priori* knowledge of the direction of change – the parameter measurement is expected to be higher or lower when comparing adjacent to upstream monitoring data).





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Appropriate hypothesis tests were established prior to examining the data. Two-sided tests were used to evaluate pH and temperature as there is no *a priori* knowledge that these parameters are expected to be higher or lower when comparing adjacent to upstream monitoring data. However, one-sided tests were used to evaluate specific conductance and DO based on the following assumptions: 1) the specific conductance would be expected to be higher adjacent to an active seep as opposed to upstream due to expected higher concentrations of metals in water emanating from a Coal Combustion Residuals (CCR) unit and 2) the DO would be expected to be lower adjacent to an active seep in a similar area as opposed to DO in a surface stream.

The null and alternative hypotheses for the seep investigation are presented below:

- Specific Conductance (SC - microSiemens/centimeter)
  - $H_0$ : Mean  $SC_{Adjacent} - \text{Mean } SC_{Upstream} = 0$
  - $H_a$ : Mean  $SC_{Adjacent} - \text{Mean } SC_{Upstream} > 0$
- pH (Standard Units)
  - $H_0$ : Mean  $pH_{Adjacent} - \text{Mean } pH_{Upstream} = 0$
  - $H_a$ : Mean  $pH_{Adjacent} - \text{Mean } pH_{Upstream} \neq 0$
- Temperature (Temp – degrees Celsius)
  - $H_0$ : Mean  $Temp_{Adjacent} - \text{Mean } Temp_{Upstream} = 0$
  - $H_a$ : Mean  $Temp_{Adjacent} - \text{Mean } Temp_{Upstream} \neq 0$
- DO (milligrams/Liter)
  - $H_0$ : Mean  $DO_{Adjacent} - \text{Mean } DO_{Upstream} = 0$
  - $H_a$ : Mean  $DO_{Adjacent} - \text{Mean } DO_{Upstream} < 0$

Statistical hypothesis tests produce a p-value (probability value). The p-value represents the probability that the mean of the adjacent measurements is equal to the mean of the upstream measurements. If the p-value of a statistical test is **small** (*i.e., below the significance level*), the normal procedure is to reject the null ( $H_0$ ), accept the alternative ( $H_a$ ), and conclude there is a **statistically significant difference between adjacent and upstream monitoring results that is unlikely to have occurred by chance**.

The statistician establishes the “significance level” ( $\alpha$ ), which is typically set between 0.01 and 0.10. This can be thought of as an acceptable false positive rate (e.g., rejecting the null when the null is true, which is equivalent to finding a statistically significant difference between adjacent and upstream monitoring data, when in fact one does not exist).

The significance level for a single test needs to be adjusted in situations where multiple hypothesis tests are going to be conducted at a site. Conducting multiple statistical tests on a site increases the chances of getting a significant result simply by chance (e.g. false positive statistical test result). For example, 16 statistical tests were conducted at the KIF Plant to identify differences in adjacent and upstream water quality parameter monitoring data for the seep investigation; if alpha is set at 0.1 and the multiple testing is ignored, then the cumulative error rate can be calculated:

$$\text{Cumulative error rate} = 1 - (1 - 0.1)^{16} = 81\% \text{ chance of making false positive error}$$



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The Bonferroni correction was utilized to adjust the significance level to control the site-wide false positive rate described above. This method simply divides the desired overall significance level (0.10) by the number of hypothesis tests conducted site-wide (4 parameters x 4 historic seeps/AOCs = 16 tests). For the KIF Plant, the adjustment yields an individual test significance level of 0.1/16 tests = 0.00625. Therefore, to reject the null and determine that there is a statistically significant difference between adjacent and upstream monitoring results that is unlikely to have occurred by chance, the p-value of the test needs to be less than 0.00625.

All data followed the normal distribution parametric T-tests utilized. In the case where variances were not equal between adjacent and upstream measurements, the Satterthwaite two-sample T-test was used to account for unequal variances.

### 4.4 TOLERANCE INTERVALS

Tolerance limits consist of two values expected to contain a pre-specified proportion of the underlying data population with a specified level of confidence. For example, for a 95% tolerance interval with a 95% confidence level, there is 95% confidence that, on average, 95% of the data population is contained within the interval. The one-sided Upper Tolerance Level (UTL) is commonly used in environmental monitoring and is constructed using background data (Ofungwu, 2014).

The calculation of the UTL is straightforward:

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

Where:

$\bar{x}$  = mean constituent concentration in background dataset

s = standard deviation of constituent in background dataset

$\tau$  = tau multiplier - based on size of dataset, confidence (95%) and desired coverage (95%)

Two sets of tolerance intervals were calculated for each parameter using data collected from control area UC24 (n=20) and UC25 (n=20), respectively. Prior to calculating tolerance intervals, the data were tested for normality and for outliers using methods described previously. All control area datasets were free of outliers and were normally distributed.

The statistical null hypothesis ( $H_0$ ) is that mean parameter measurements collected from intermediate areas lie within the tolerance interval, and the alternate hypothesis ( $H_a$ ) is that the mean parameter measurements are outside of the tolerance interval. In order to test these hypotheses, 95% confidence intervals around the mean parameter measurements from the intermediate area data were estimated and compared to the upstream control area tolerance intervals. Prior to calculating confidence intervals, the intermediate area monitoring data were pooled and tested for normality and for outliers using methods described previously. The intermediate area dataset was free of outliers and was normally distributed.



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Confidence intervals were calculated based on the following equation:

$$\text{Confidence Interval} = \bar{x} + / - t_{1-\alpha/2, n-1} * s / \sqrt{n}$$

Where,

$\bar{x}$  = mean parameter measurement in intermediate area

s = standard deviation of parameter measurement in intermediate area

n = number of measurements in intermediate area dataset

$t_{(1-\alpha/2, n-1)}$  = two tailed t value, with n-1 degrees of freedom (where  $\alpha = 0.05$ )

Statistically significant differences were identified if the confidence interval calculated using the intermediate area dataset falls outside of the applicable upstream control area tolerance interval.

### 5.0 STATISTICAL ANALYSIS RESULTS

The following sections describe the results of 1) the hypothesis testing comparing the water quality parameter results between the adjacent and upstream measurements at each of the four historical seep/AOC locations, and 2) the interval testing comparing the water quality parameter results from intermediate areas to two upstream control areas.

#### 5.1 HYPOTHESIS TESTING RESULTS: ADJACENT AND UPSTREAM MEASUREMENT COMPARISONS AT HISTORIC SEEP/AOC LOCATIONS

A historic seep/AOC is considered an AOI when the mean values of all four water quality parameters (DO, pH, specific conductance and temperature) are found to be statistically different when comparing adjacent to upstream monitoring data. For pH and temperature, the difference between upstream and adjacent measurements may be either positive or negative. However, it is expected that an active seep would increase specific conductance (due to higher concentrations of metals in water emanating from a CCR unit) and decrease DO (as seep water from a similar area would have decreased DO relative to a surface stream). Therefore, only significant increases in specific conductance and significant decreases in DO in the adjacent areas, relative to the upstream areas were evaluated. Table D.3 provides a summary of the hypothesis testing, including the p-values obtained using procedures described in preceding sections to identify significant differences between adjacent and upstream water quality parameter monitoring data at the four identified historical seep/AOC locations. None of the evaluated historical seep locations/AOCs were observed to have statistically significant values across all four prescribed parameters. Therefore, no AOIs were identified for further investigation or data collection.



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### 5.2 INTERVAL TESTING RESULTS: INTERMEDIATE AREA COMPARISON TO UPSTREAM CONTROL AREAS

Water quality parameter monitoring results collected from intermediate areas were evaluated against monitoring data collected from upstream control location groups (UC24 and UC25) to identify any AOIs. A visual comparison of the upstream control data suggests that there is a difference between water quality parameter readings between the two upstream control locations. Box plots comparing the distributions of the two upstream control areas are presented in Attachment D.1. The visual observations were confirmed using hypothesis testing; all four parameters were statistically significantly different when comparing UC24 to UC25. The differences are possibly due to physical location (i.e., UC25 is further north and located ‘around the bend’ of the river from investigated historical seep/AOC locations except for historic seep M/AOC#3 (M/AOC#3)).

To account for potential differences between upstream control locations, water quality parameter readings for intermediate areas north of M/AOC#3 were compared to the results from UC25; all other intermediate area readings were compared to the results from UC24. For an intermediate area to be considered an AOI, the mean values of all four water quality parameters (DO, pH, specific conductance and temperature) are required to be statistically different when monitoring data collected from intermediate areas are compared to data collected in the upstream control areas. Table D.4 presents a summary of the interval testing results used to identify significant differences between intermediate areas and upstream control location monitoring data. This analysis did not identify any additional AOIs for further investigation.

## 6.0 REFERENCES

- Ofungwu, J., 2014. *Statistical Applications for Environmental Analysis and Risk Assessment*. Hoboken, New Jersey: John Wiley and Sons, Inc.
- Tukey, J.W., 1977. *Exploratory Data Analysis*. Reading, Massachusetts: Addison-Wesely, 1977
- U.S. Environmental Protection Agency, 2009. *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance*.



# **TABLES**

**TABLE D.1 – Summary of Water Quality Parameter Measurement Locations  
Kingston Fossil Plant  
April 2019**

Historical Seep / AOC Locations	Measurement Location IDs	Number of Measurements		
		Downstream	Adjacent	Upstream
L/AOC#2	KIF-LAOC2-D-2 through KIF-LAOC2-U-30	10	8	11
HSK	KIF-HSK-D-35 through KIF-HSK-U-63	10	9	10
HScluster-(C,R)	KIF-HSCR-D-69 through KIF-HSCR-U-96	10	8	10
M/AOC#3,HSD	KIF-MAOC3HSD-D-119 through KIF-MAOC3HSD-U-147	10	9	10

**Notes:**

1. Historic Seep (HS) and Area of Concern (AOC) locations and measurement location identifications (IDs) are shown on Exhibits A.1 through A.3.

**TABLE D.2 – Tests of Normality and Equality of Variances between Adjacent and Upstream Monitoring Results  
Kingston Fossil Plant  
April 2019**

Monitoring Parameters	Historical Seep/AOC Location			
	L/AOC#2	HSK	HS Cluster-(C,R)	M/AOC#3,HSD
Number of Samples (Adjacent / Upstream)	8 / 11	9 / 10	8 / 10	9 / 10
Dissolved Oxygen	Normal / =	Normal / =	Normal / ≠	Normal / ≠
pH	Normal / ≠	Normal / =	Normal / =	Normal / ≠
Specific Conductance	Normal / =	Normal / =	Normal / =	Normal / =
Temperature	Normal / =	Normal / ≠	Normal / =	Normal / =

**Notes:**

- = Variances are equal when comparing adjacent and upstream data sets
- ≠ Variances are not equal when comparing adjacent and upstream data sets
- AOC Historical Area of Concern
- HS Historical Seep
- Normal Data Sets (adjacent and upstream) are normally distributed (alpha=0.01)

**TABLE D.3 – Summary of Statistical Hypothesis Testing  
Kingston Fossil Plant  
April 2019**

Historical Seep/ AOC Location	Number of Samples	p-value			
		DO	pH	Specific Conductance	Temperature
	Adjacent / Upstream	mg/L	SU	uS/cm	DEG C
L/AOC#2	8 / 11	0.9911	0.0699	0.1115	0.0043
HSK	9 / 10	0.0968	0.0024	0.1032	0.0032
HS Cluster-(C,R)	8 / 10	0.8677	0.3919	0.1039	0.0026
M/AOC#3, HSD	9 / 10	0.9926	0.0000	0.6558	0.0004

**Notes:**

AOC                      Historical Area of Concern  
 DEG C                    degrees Celsius  
 DO                        Dissolved Oxygen  
 HS                        Historical Seep  
 mg/L                     milligrams per Liter  
 SU                        Standard Units  
 SWFPR                  site-wide false positive rate  
 uS/cm                    microSiemens per centimeter

1. The p-value represents the probability that the mean of the adjacent measurements is equal to the mean of the upstream measurements. If a p-value is small (i.e., below the significance level), it is indicative that there is a statistically significant difference between adjacent and upstream monitoring results that is unlikely to have occurred by chance.
2. Adjusted Significance Level (SWFPR/No. of Statistical Tests):  $0.10/16 = 0.00625$
3. Shaded values indicate a statistically significant difference between measurements at relative locations to historical seeps/AOCs (p-value is below adjusted significance level, reject null hypothesis).



**TABLE D.4 – Summary of Intermediate Area Statistical Testing  
Kingston Fossil Plant  
April 2019**

Parameter	Confidence Interval Intermediate	Tolerance Interval		Confidence Interval Intermediate	Tolerance Interval	
	Area 1 <sup>(a)</sup>	UC 25	Significant?	Area 2 <sup>(b)</sup>	UC 24	Significant?
Dissolved Oxygen	(7.482 - 8.51)	(7.164 - 9.11)	No	(7.961 - 8.657)	(7.209 - 8.375)	No
pH	(7.718 - 7.89)	(7.278 - 7.514)	Yes	(6.813 - 7.149)	(7.071 - 7.251)	No
Specific Conductance	(57.68 - 62.88)	(48.17 - 52.19)	Yes	(51.03 - 56.87)	(46.24 - 47.8)	Yes
Temperature	(19.34 - 19.82)	(18.77 - 19.65)	No	(15.02 - 16.18)	(15.97 - 18.47)	No

**Notes:**

%                      percent  
UC                      Upstream Control

<sup>(a)</sup> Confidence Interval: 95% confidence interval from intermediate areas north of M/AOC#3.

<sup>(b)</sup> Confidence Interval: 95% confidence interval from intermediate areas south of M/AOC#3.

1. Tolerance Interval: 95% tolerance interval with 95% coverage.
2. Shaded values are statistically significant differences if the confidence interval calculated using the intermediate area data set falls outside of the tolerance interval.

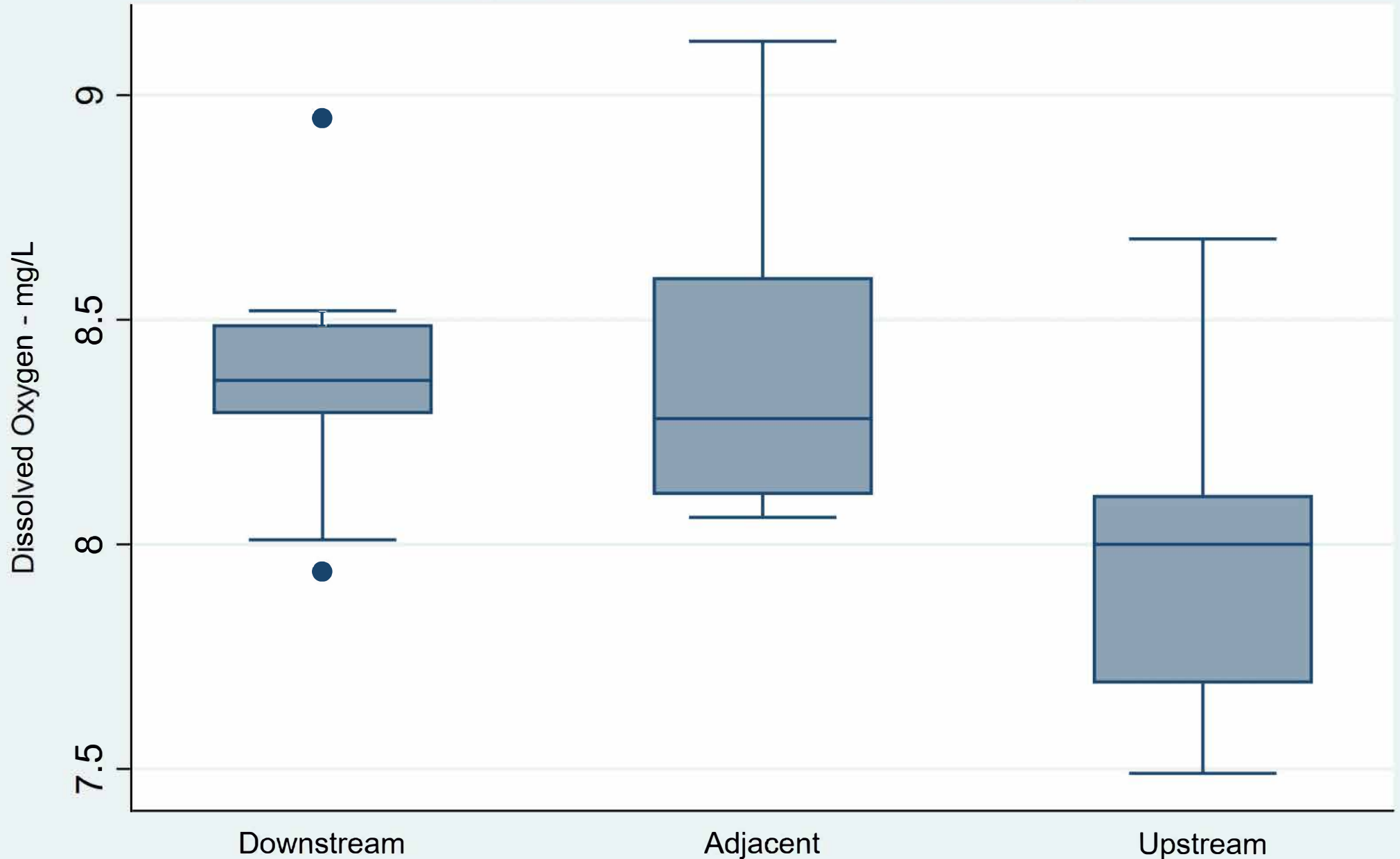
# **ATTACHMENTS**

# **ATTACHMENT D.1**

## **Time-Series and Box Plots**

# Dissolved Oxygen by Relative Location

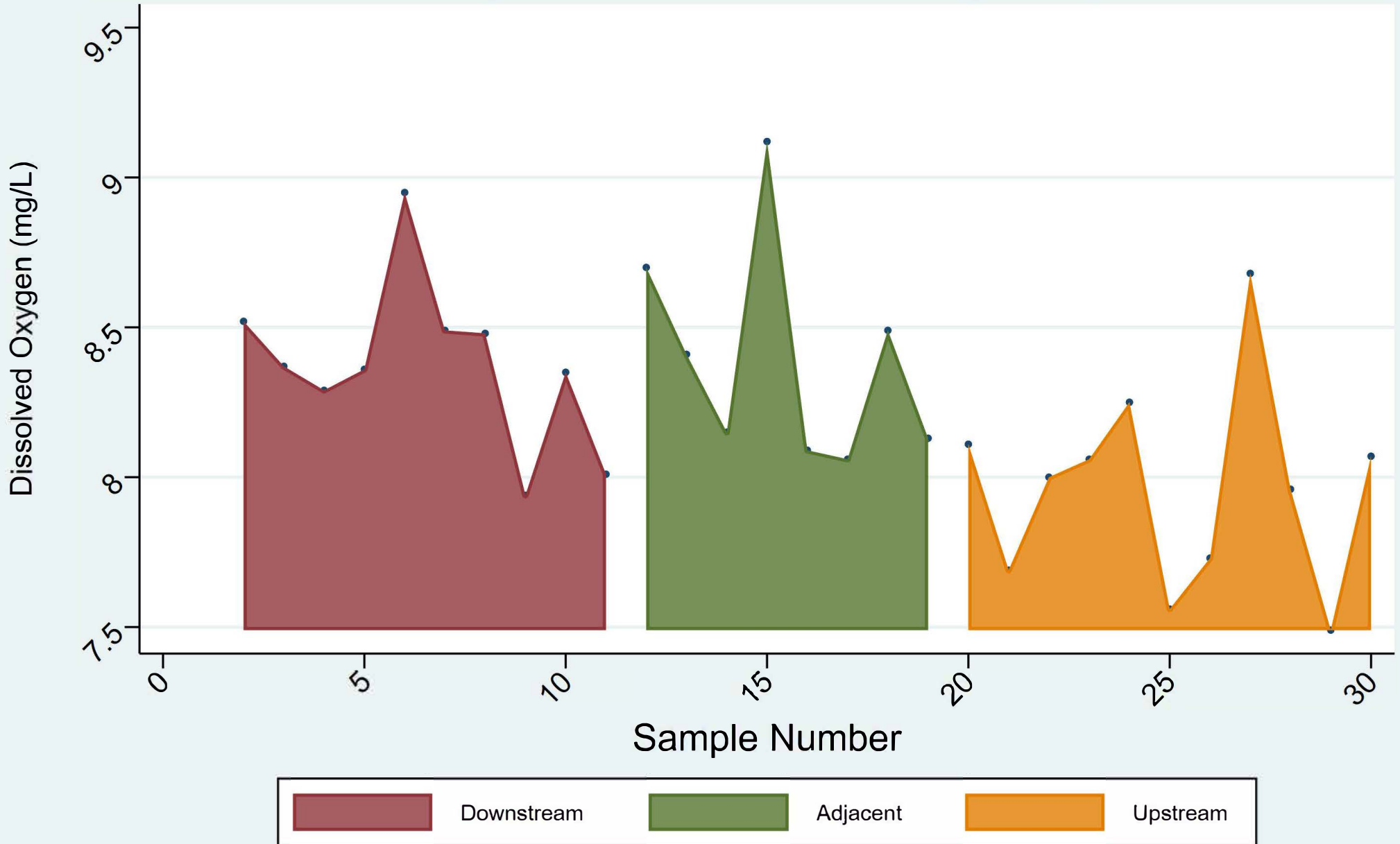
## TVA-Kingston Fossil Plant- TDEC Order Seep Investigation



Historic Seep/AOC = L/AOC#2 - Sample Date 4/23 - 4/24/2019

# Time Series - Dissolved Oxygen

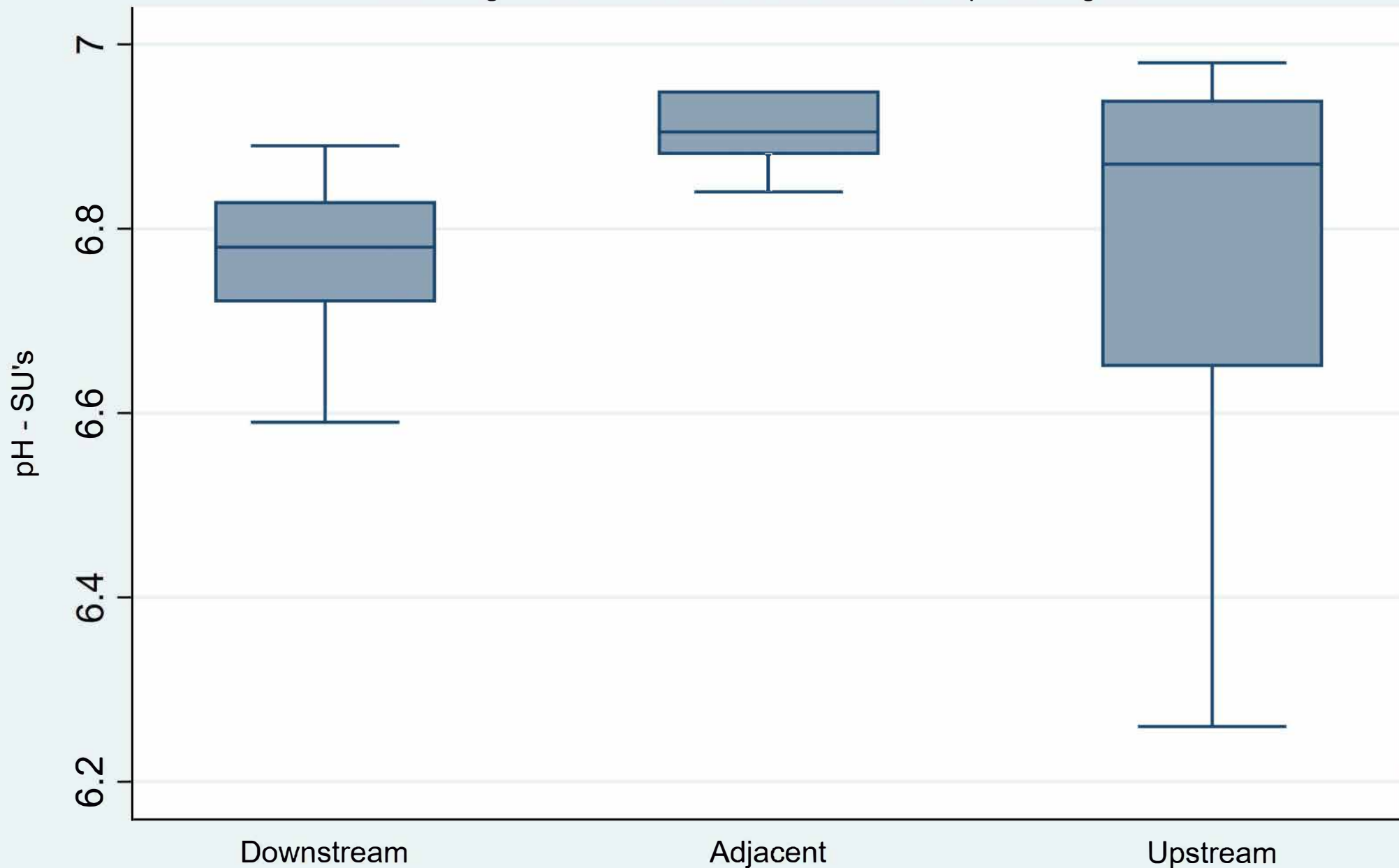
TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = L/AOC#2 - Sample Date 4/23 - 4/24/2019

# pH by Relative Location

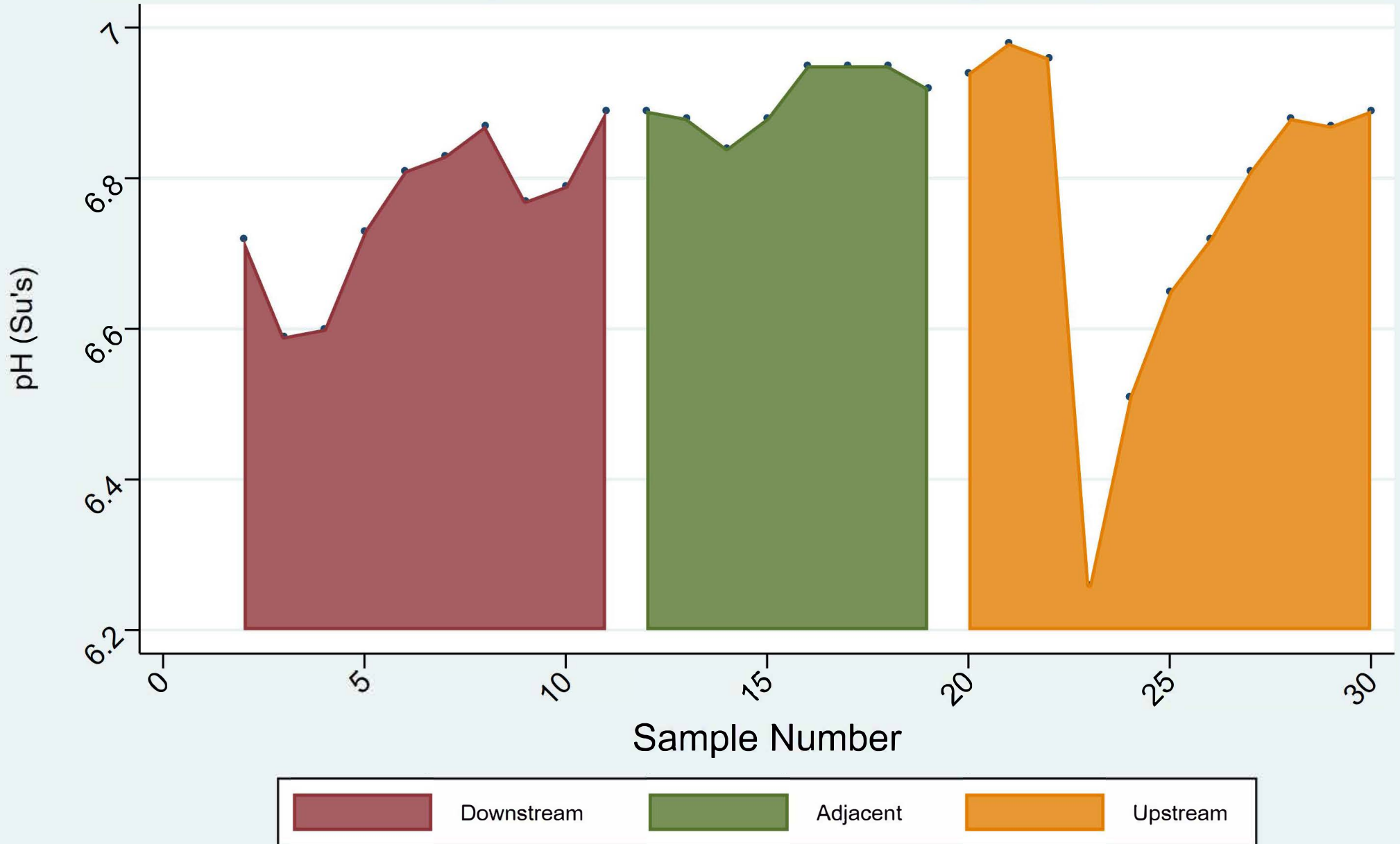
TVA-Kingston Fossil Plant- TDEC Order Seep Investigation



Historic Seep/AOC = L/AOC#2 - Sample Date 4/23 - 4/24/2019

# Time Series - pH

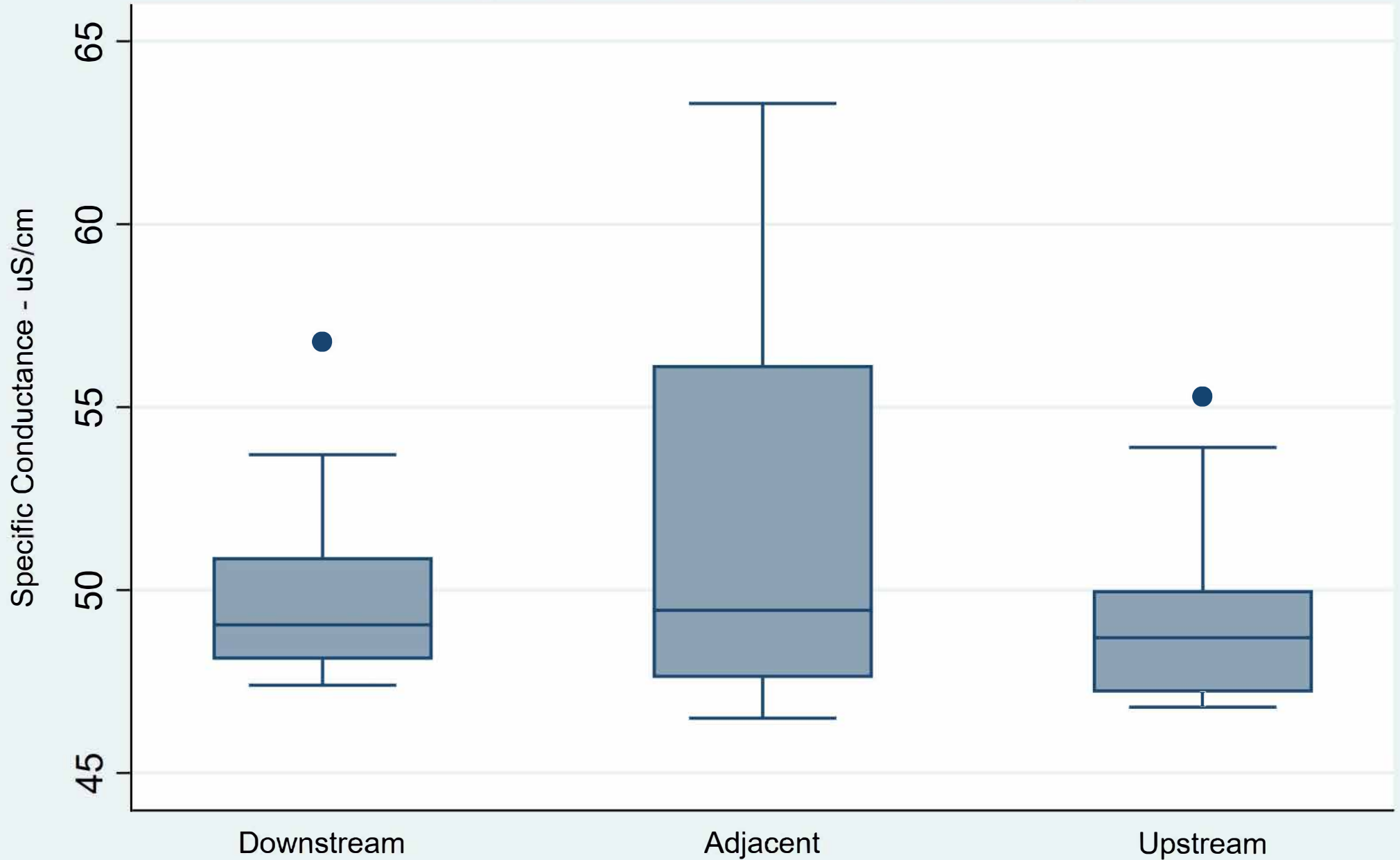
TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = L/AOC#2 - Sample Date 4/23 - 4/24/2019

# Specific Conductance by Relative Location

TVA-Kingston Fossil Plant- TDEC Order Seep Investigation

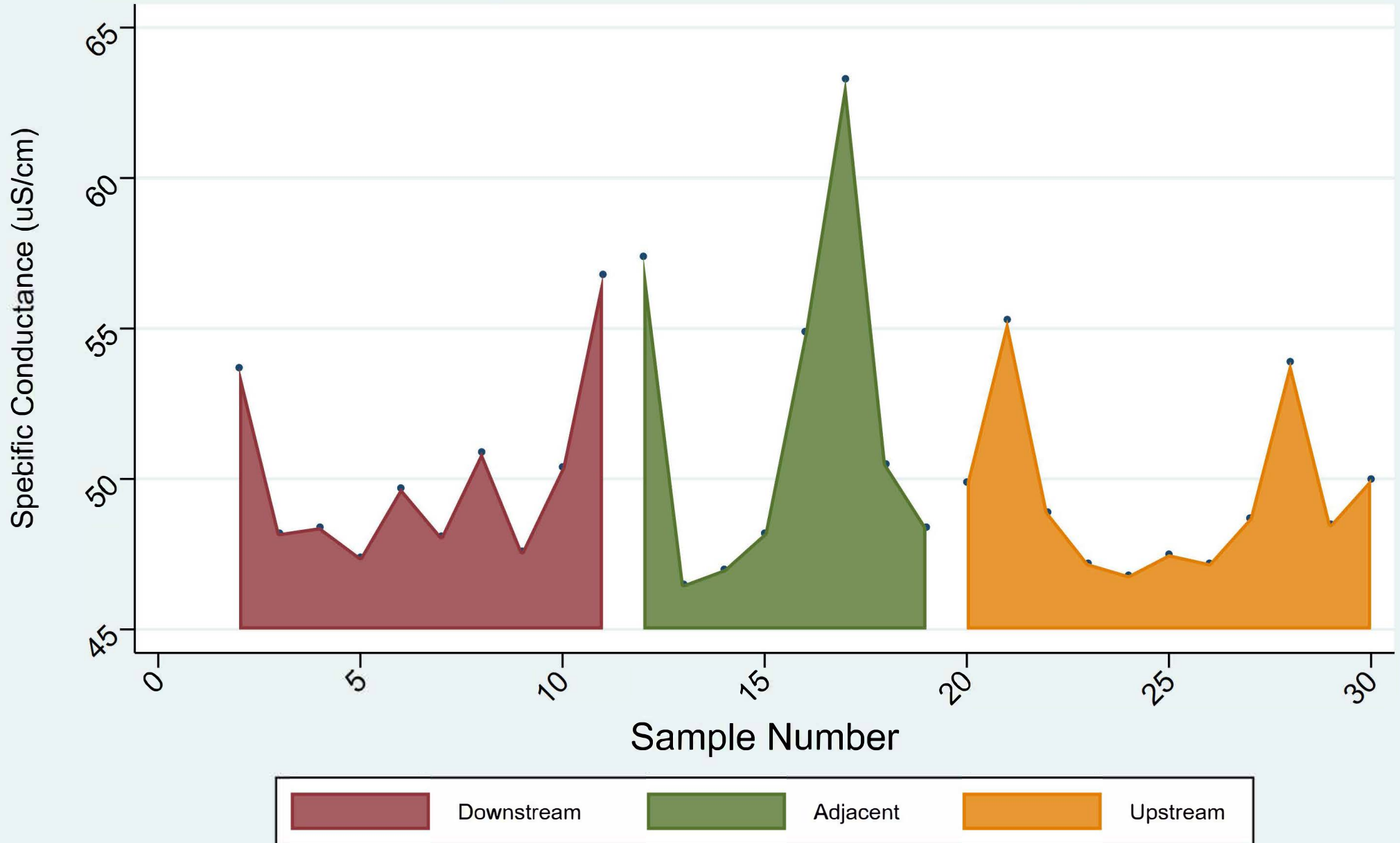


Historic Seep/AOC = L/AOC#2 - Sample Date 4/23 - 4/24/2019



# Time Series - Specific Conductance

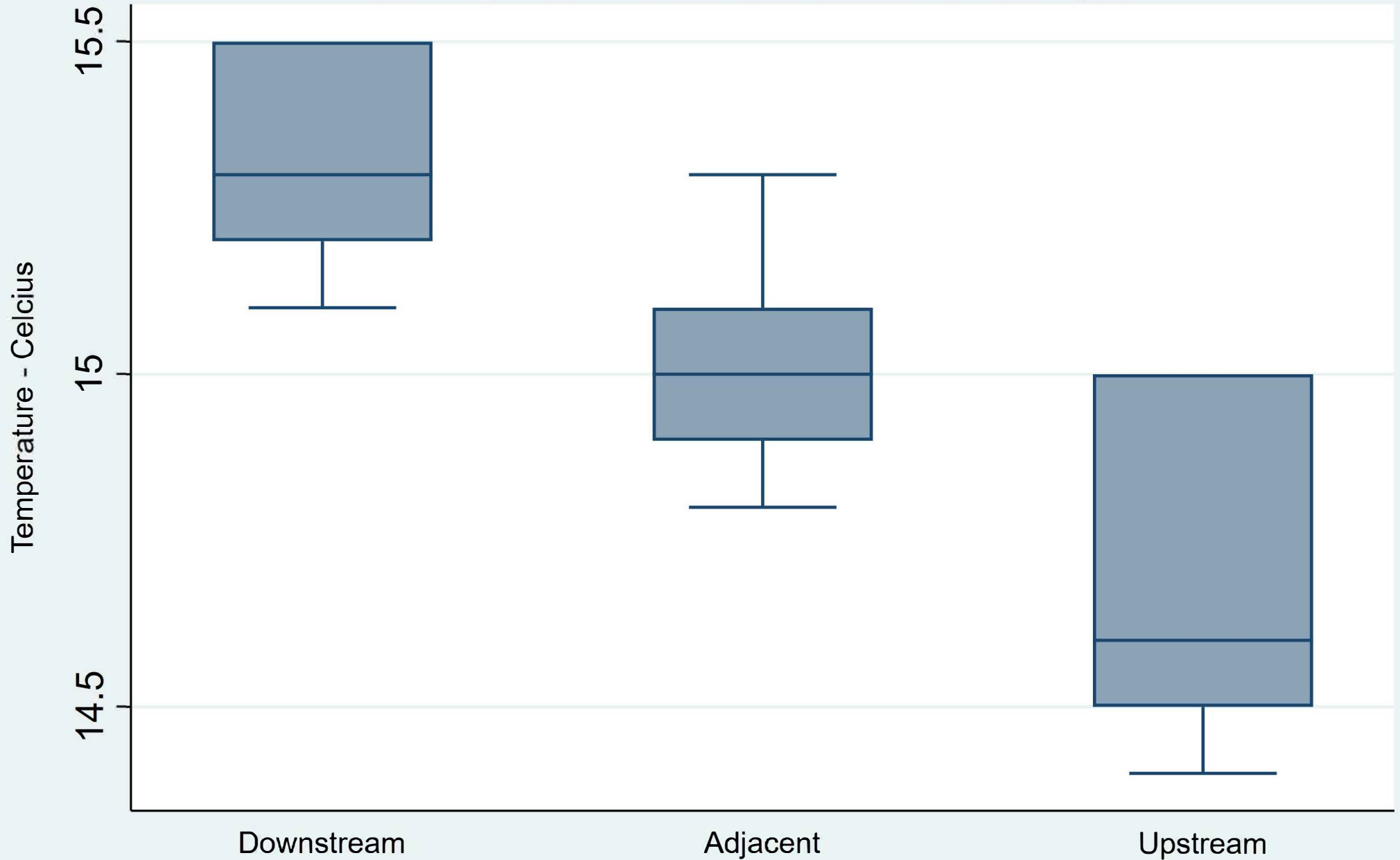
## TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = L/AOC#2 - Sample Date 4/23 - 4/24/2019

# Temperature by Relative Location

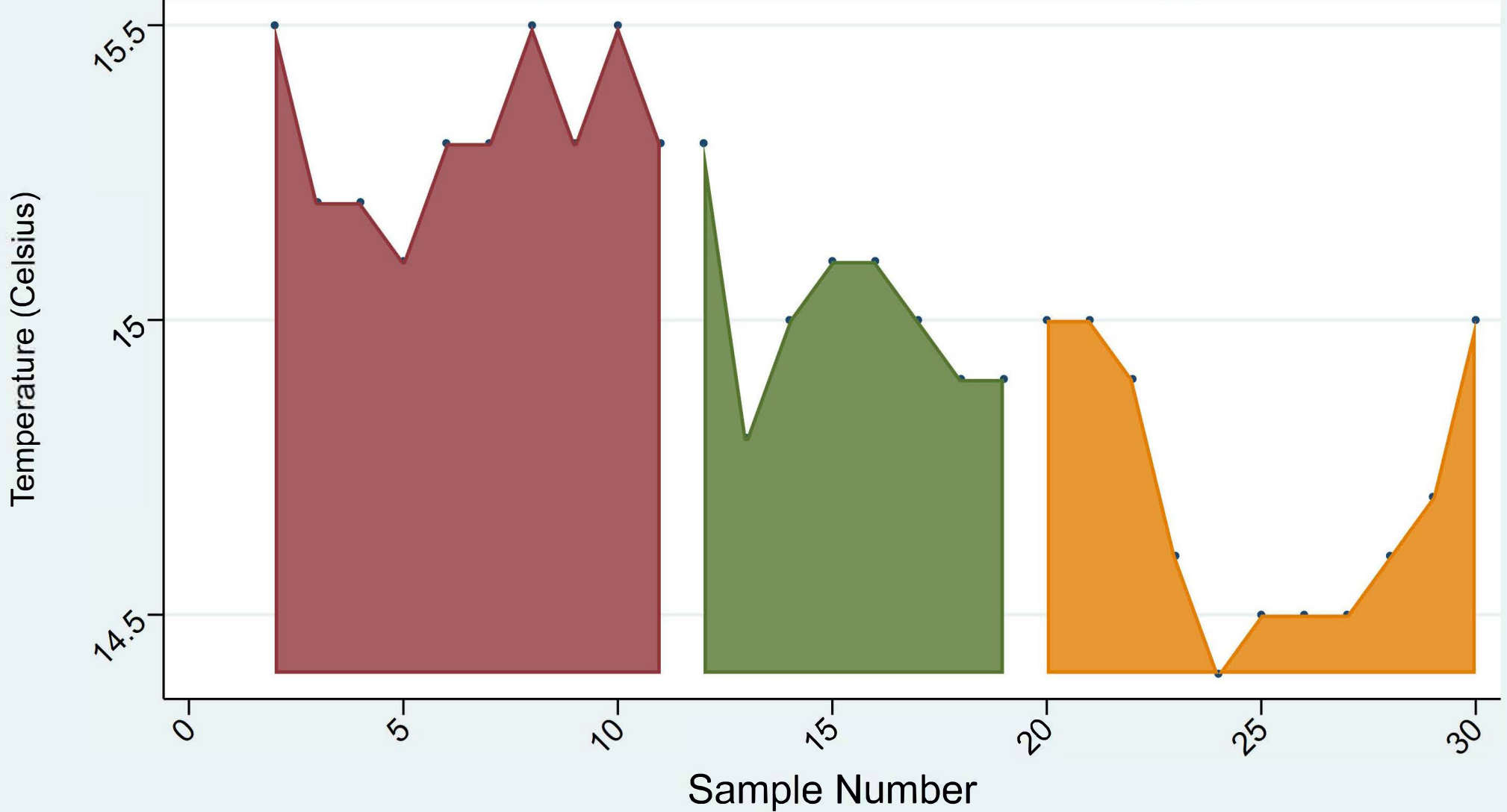
TVA-Kingston Fossil Plant- TDEC Order Seep Investigation



AHistoric Seep/OC = L/AOC#2 - Sample Date 4/23 - 4/24/2019

# Time Series - Temperature

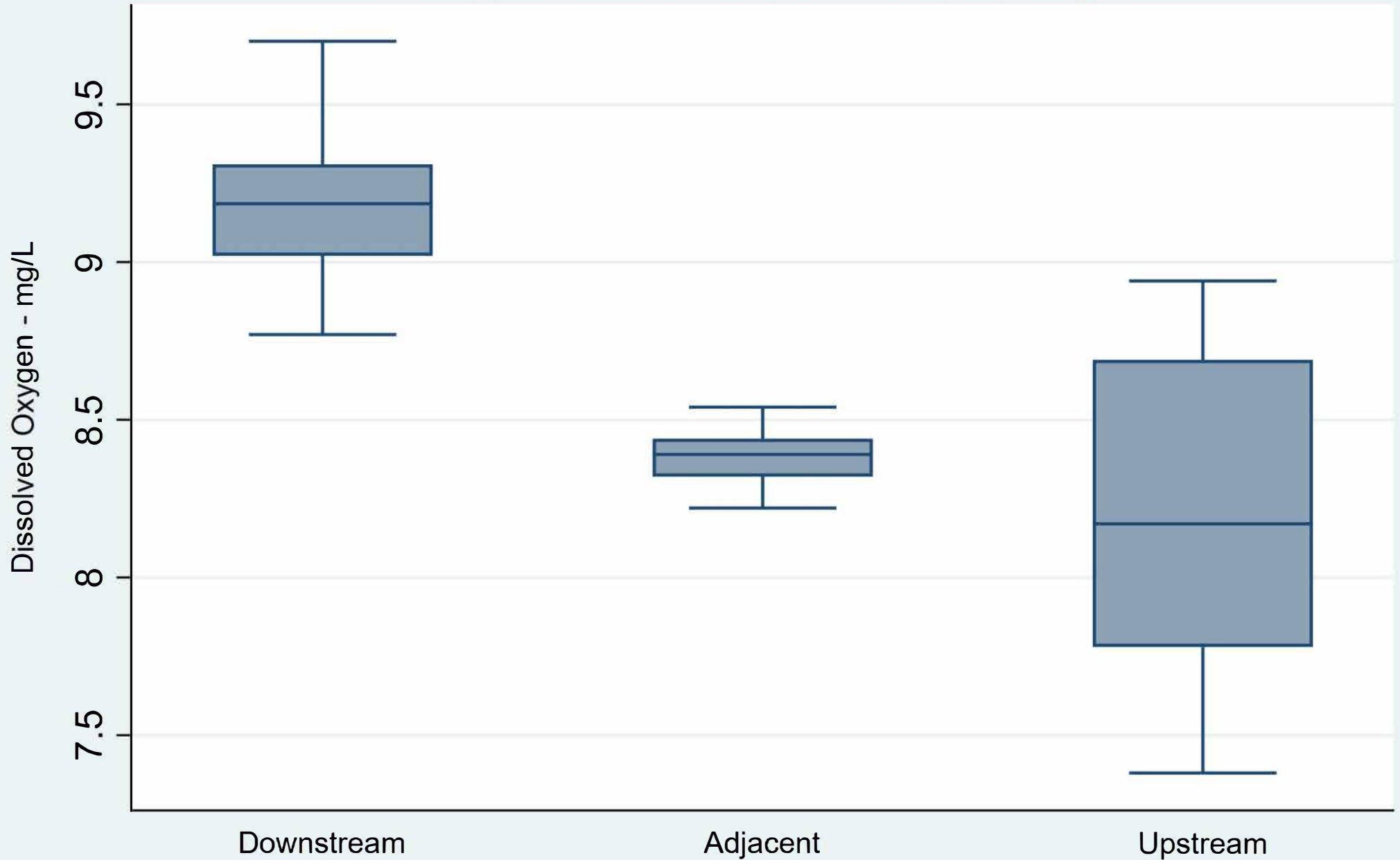
TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = L/AOC#2 - Sample Date 4/23 - 4/24/2019

# Dissolved Oxygen by Relative Location

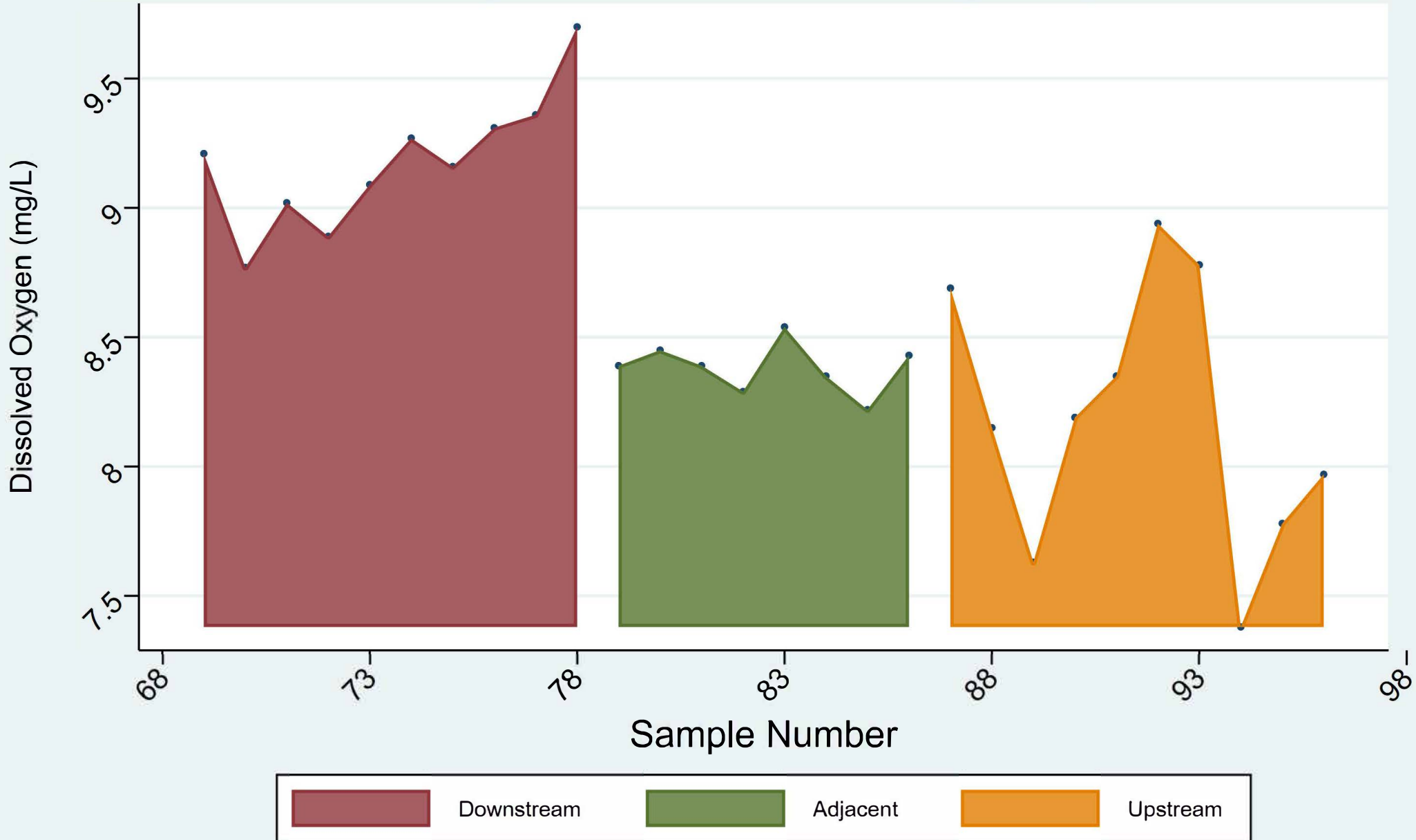
TVA-Kingston Fossil Plant- TDEC Order Seep Investigation



Historic Seep/AOC = HS Cluster-(C,R) - Sample Date 4/24/2019

# Time Series - Dissolved Oxygen

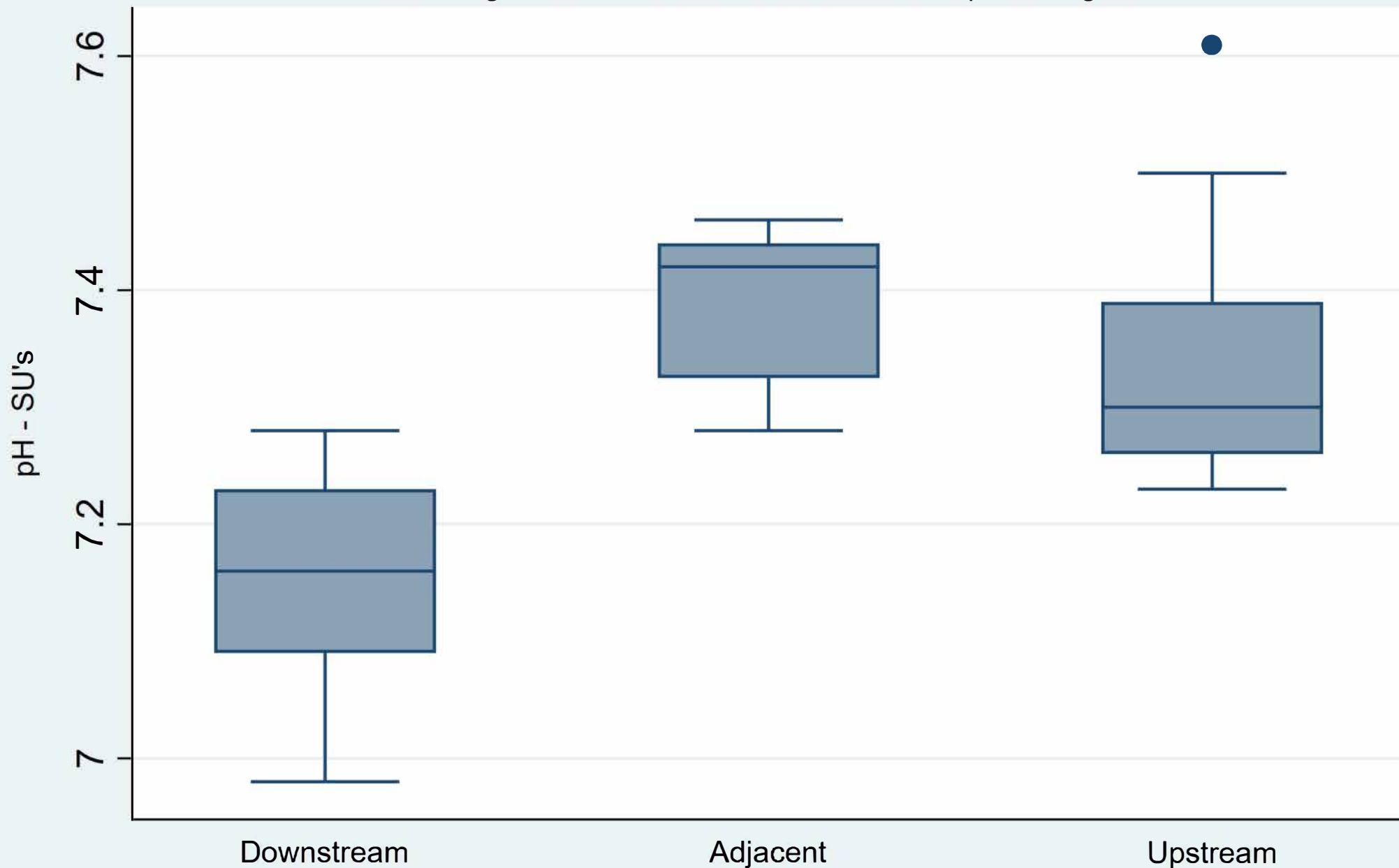
TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = HS Cluster-(C,R) - Sample Date 4/24/2019

# pH by Relative Location

TVA-Kingston Fossil Plant- TDEC Order Seep Investigation

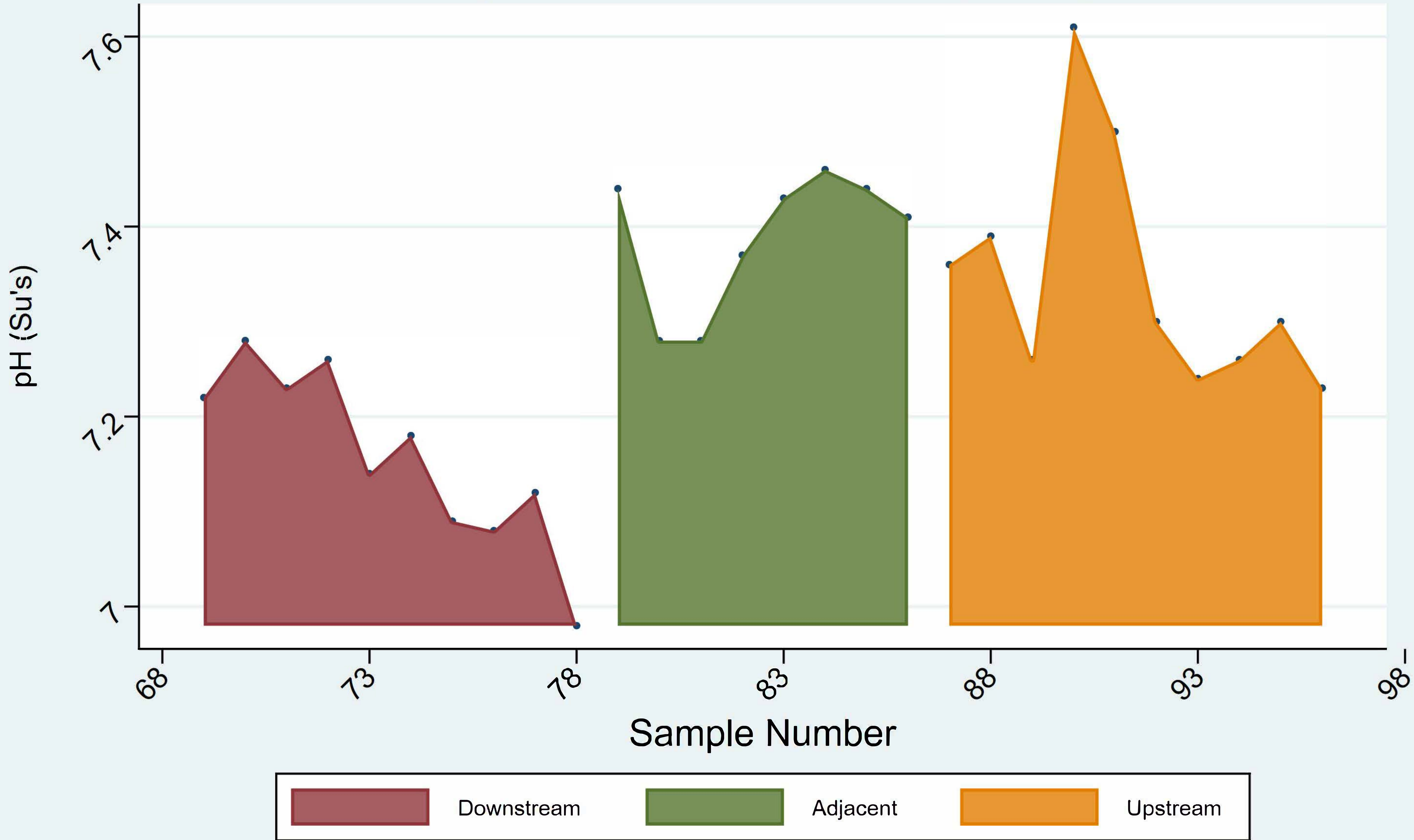


Historic Seep/AOC = HS Cluster-(C,R) - Sample Date 4/24/2019



# Time Series - pH

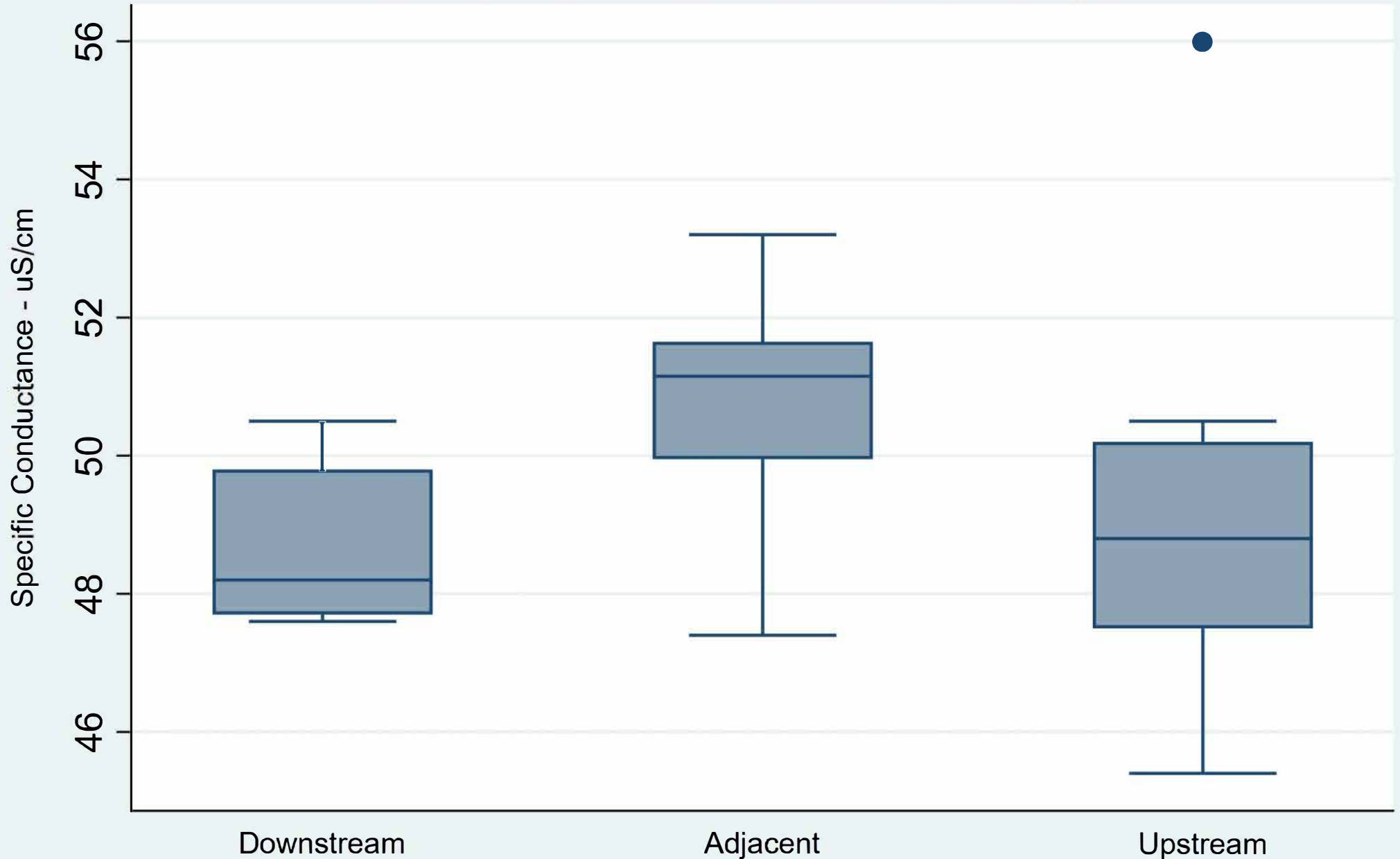
TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC - HS Cluster-(C,R) - Sample Date 4/24/2019

# Specific Conductance by Relative Location

TVA-Kingston Fossil Plant- TDEC Order Seep Investigation

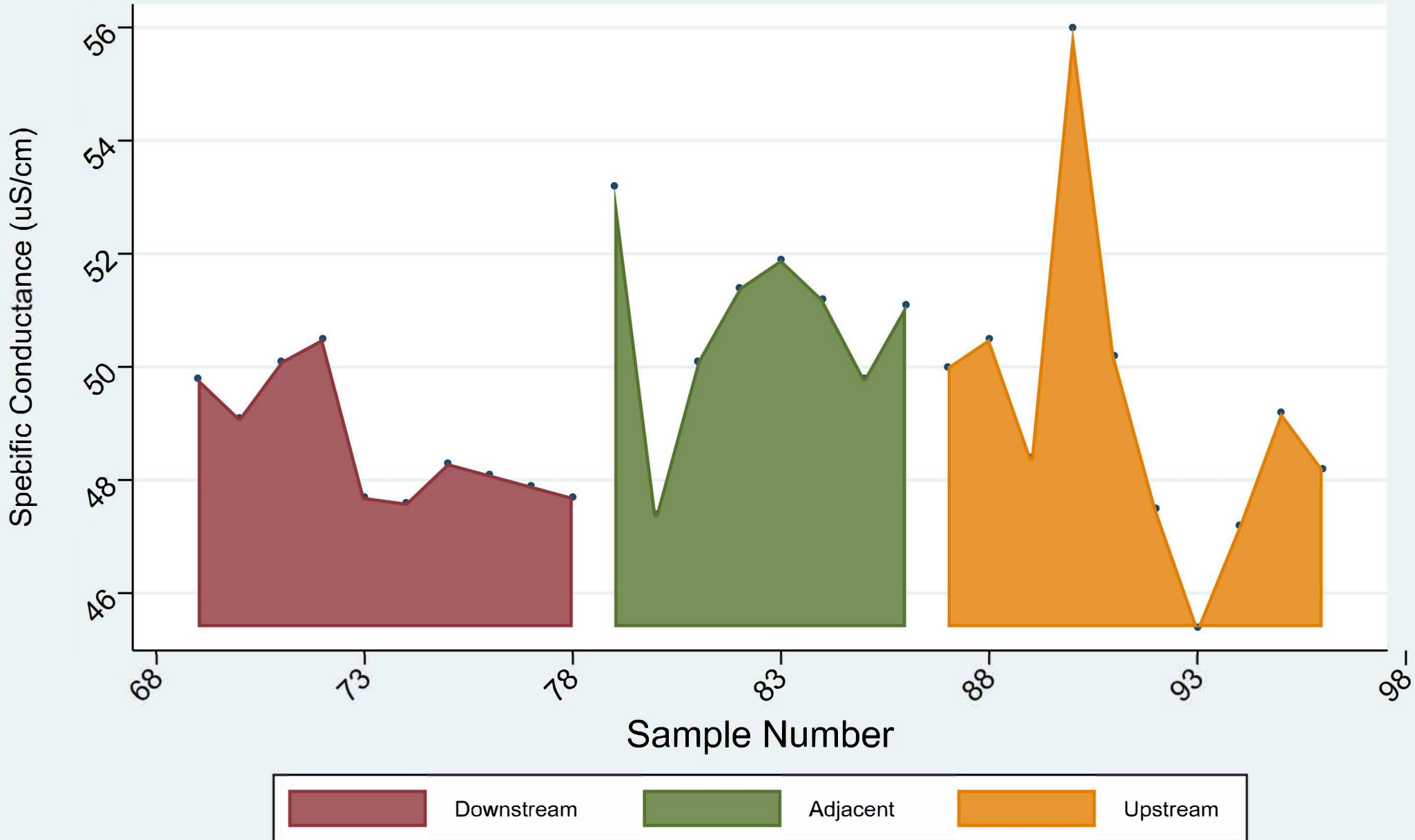


Historic Seep/AOC = HS Cluster-(C,R) - Sample Date 4/24/2019



# Time Series - Specific Conductance

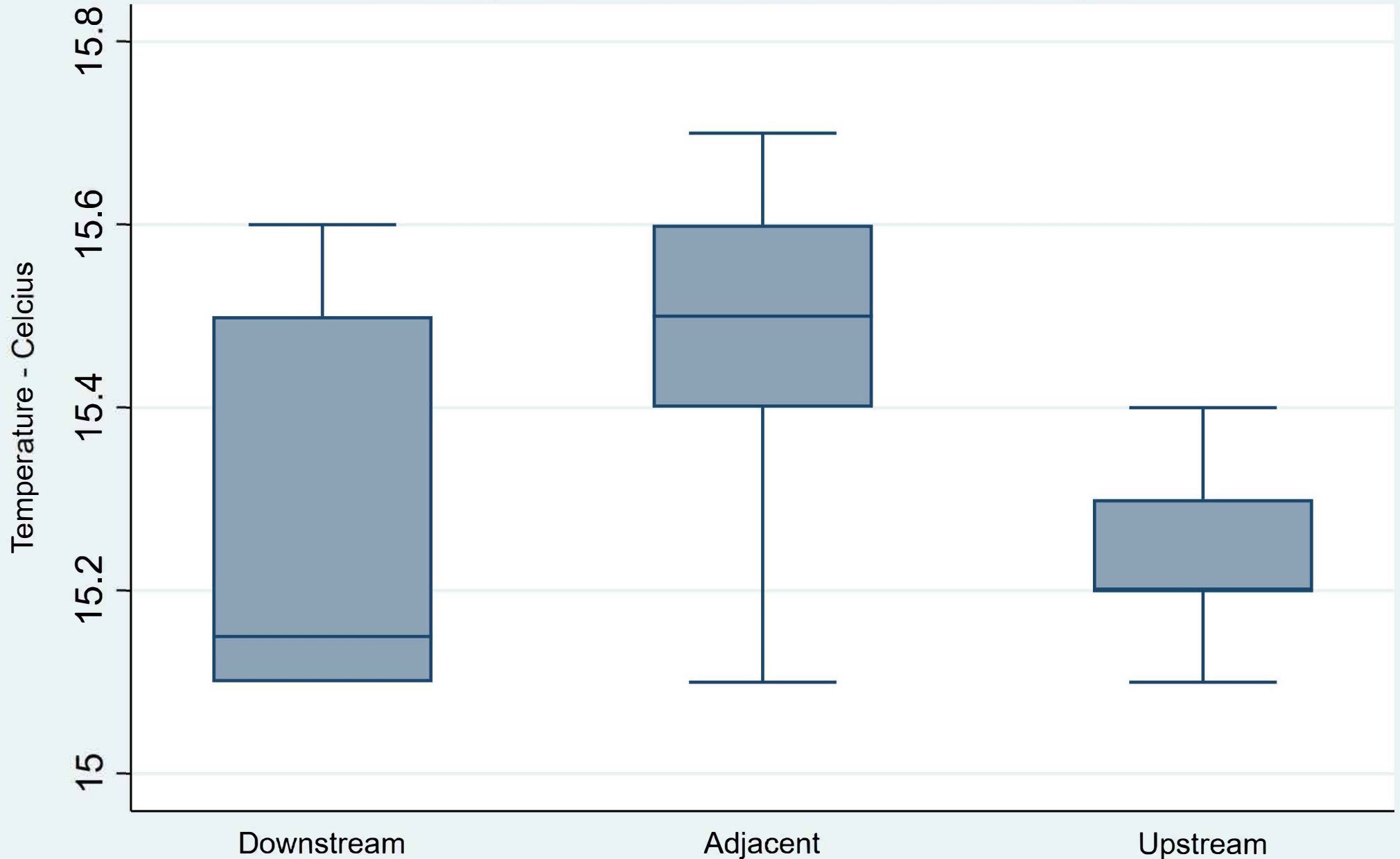
## TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = HS Cluster-(C,R) - Sample Date 4/24/2019

# Temperature by Relative Location

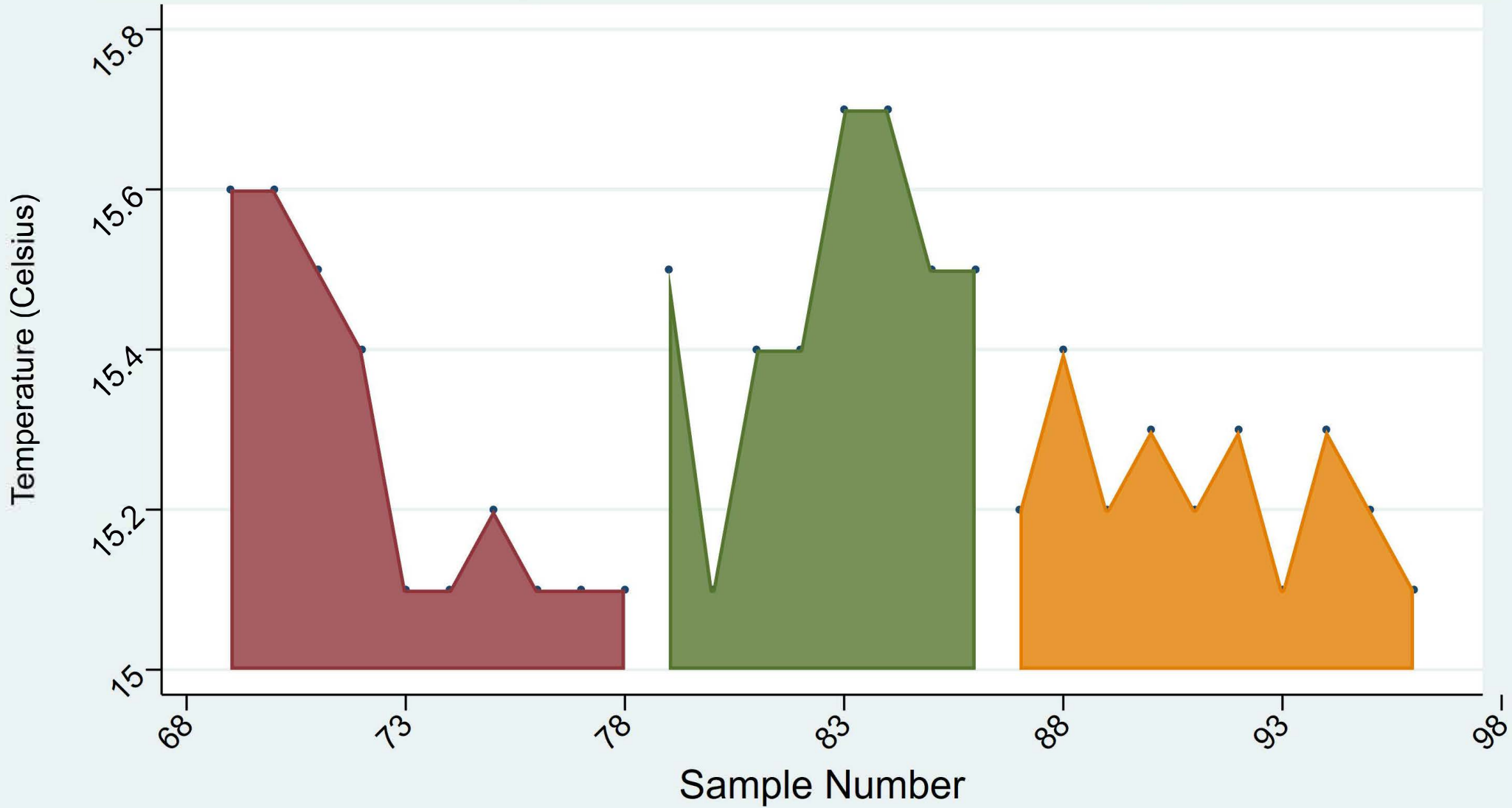
TVA-Kingston Fossil Plant- TDEC Order Seep Investigation



Historic Seep/AOC = HS Cluster-(C,R) - Sample Date 4/24/2019

# Time Series - Temperature

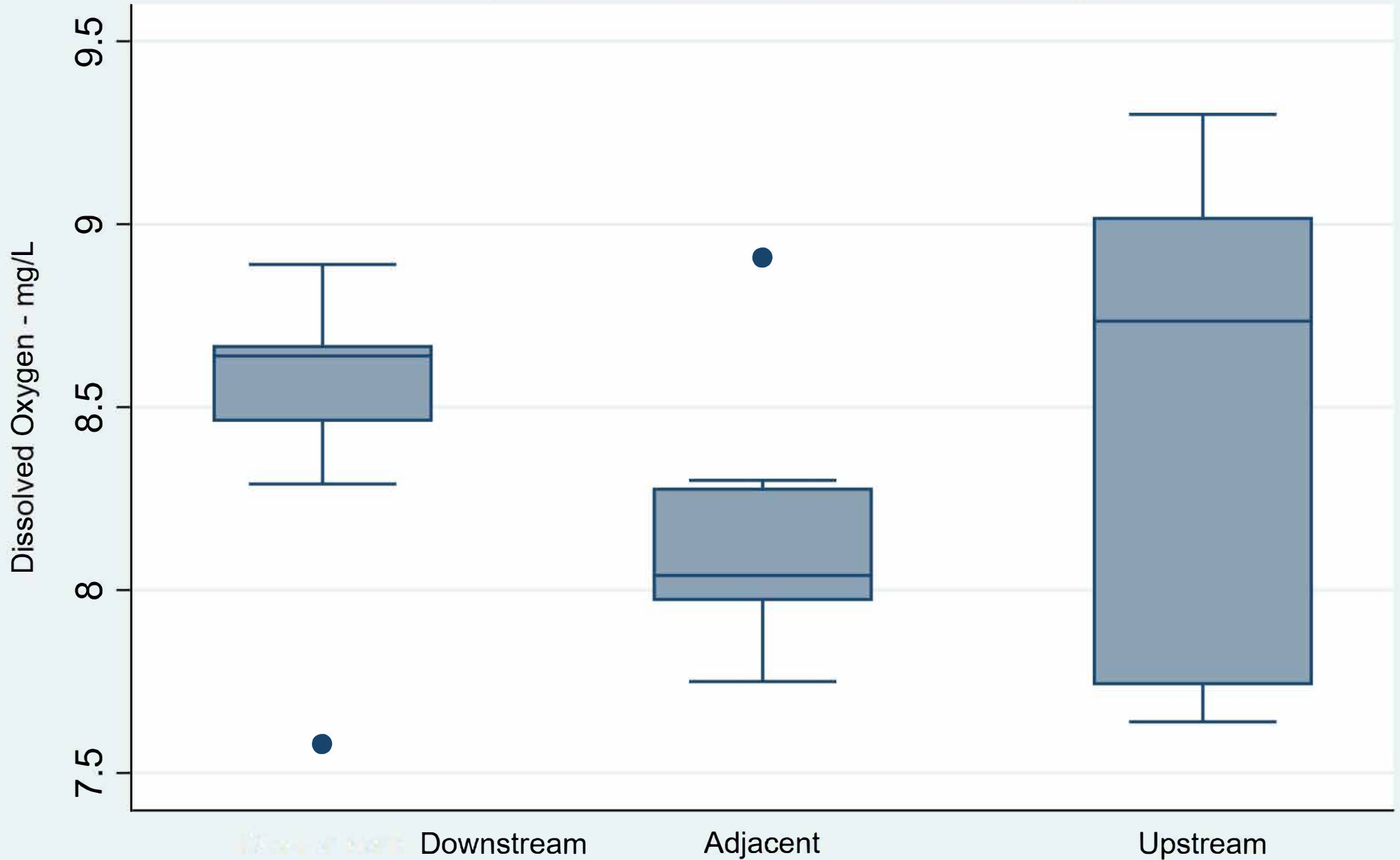
TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = HS Cluster-(C,R) - Sample Date 4/24/2019

# Dissolved Oxygen by Relative Location

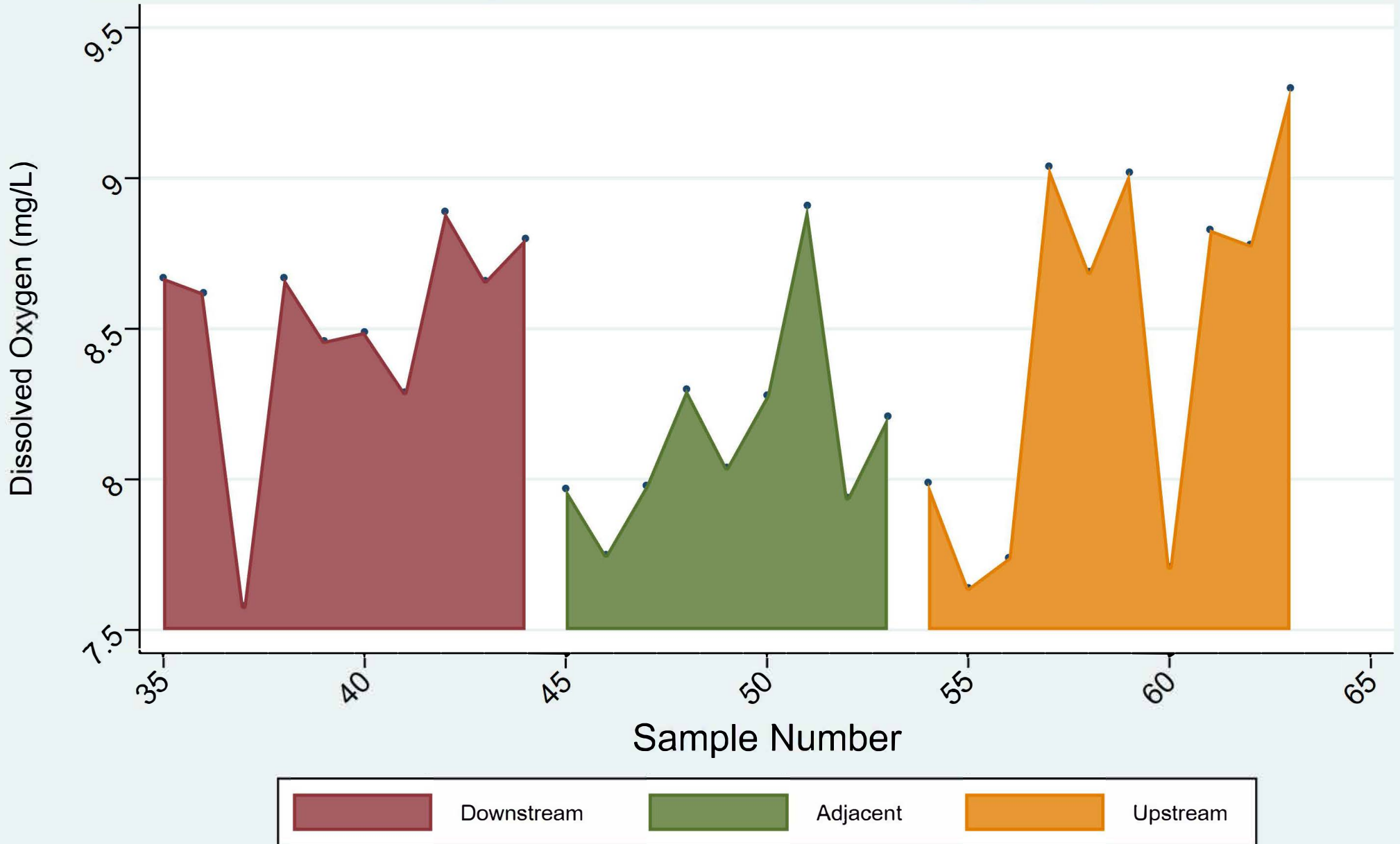
## TVA-Kingston Fossil Plant- TDEC Order Seep Investigation



Historic Seep/AOC = HSK - Sample Date 4/24/2019

# Time Series - Dissolved Oxygen

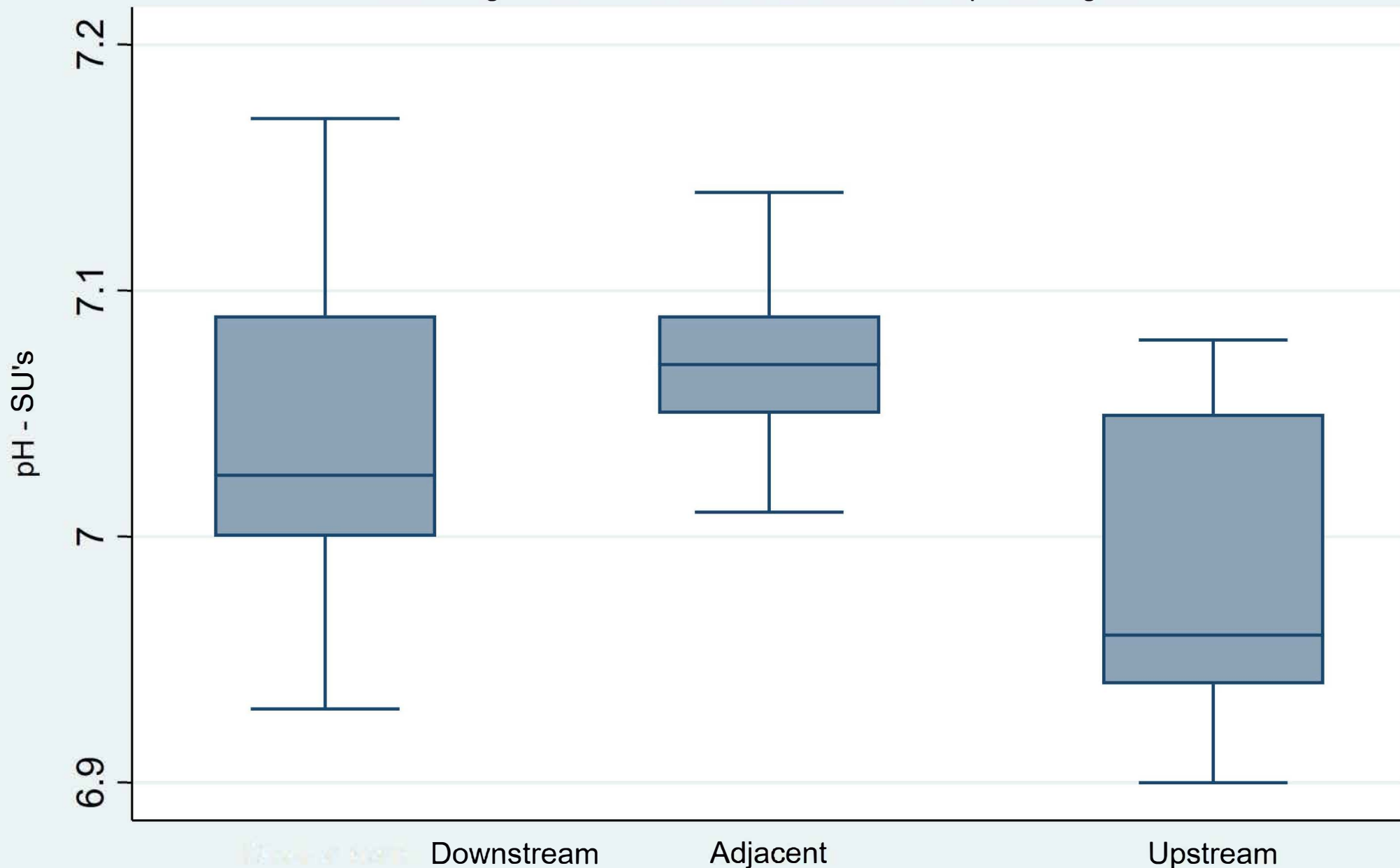
TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = HSK - Sample Date 4/24/2019

# pH by Relative Location

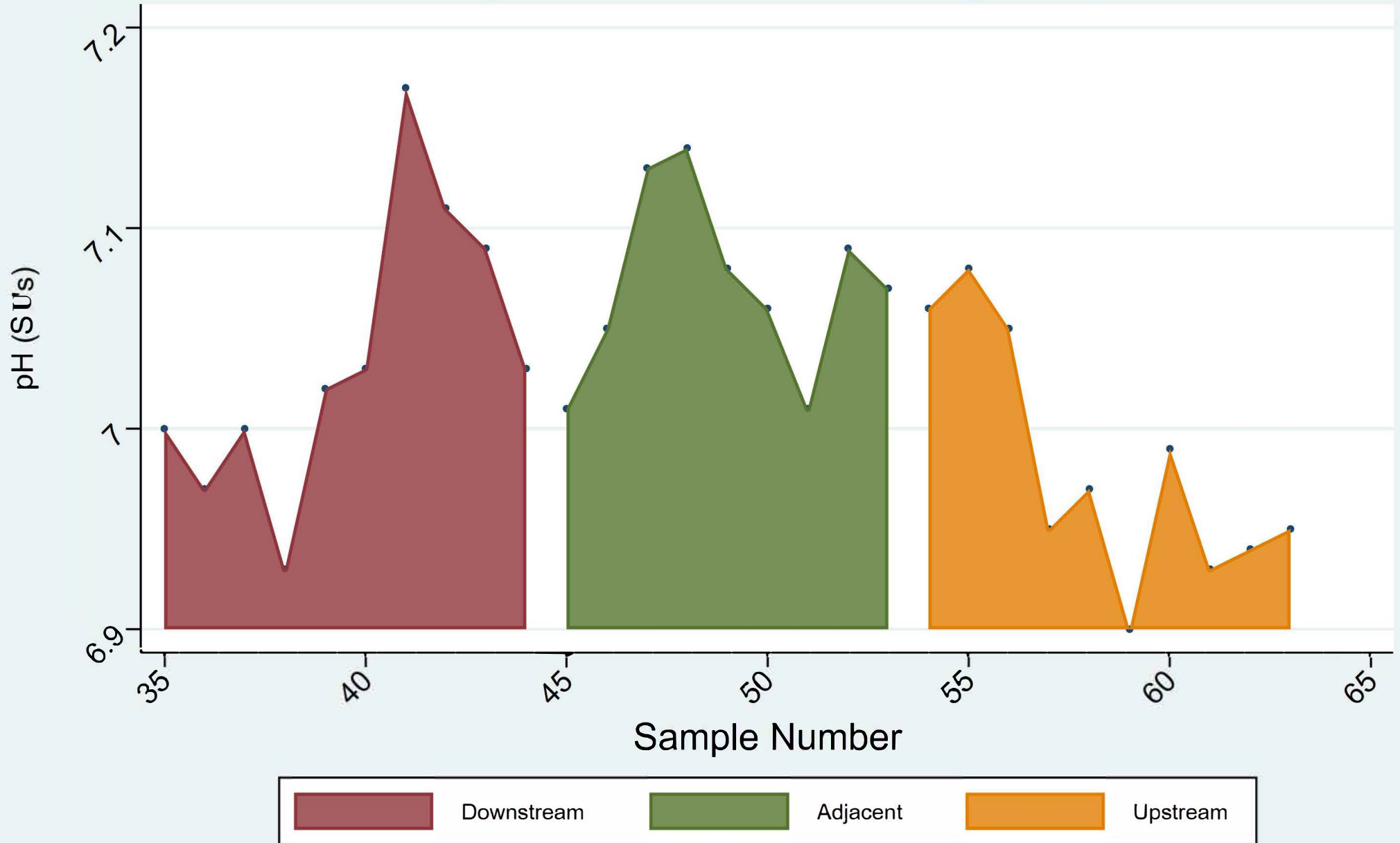
TVA-Kingston Fossil Plant- TDEC Order Seep Investigation



Historic Seep/AOC = HSK - Sample Date 4/24/2019

# Time Series - pH

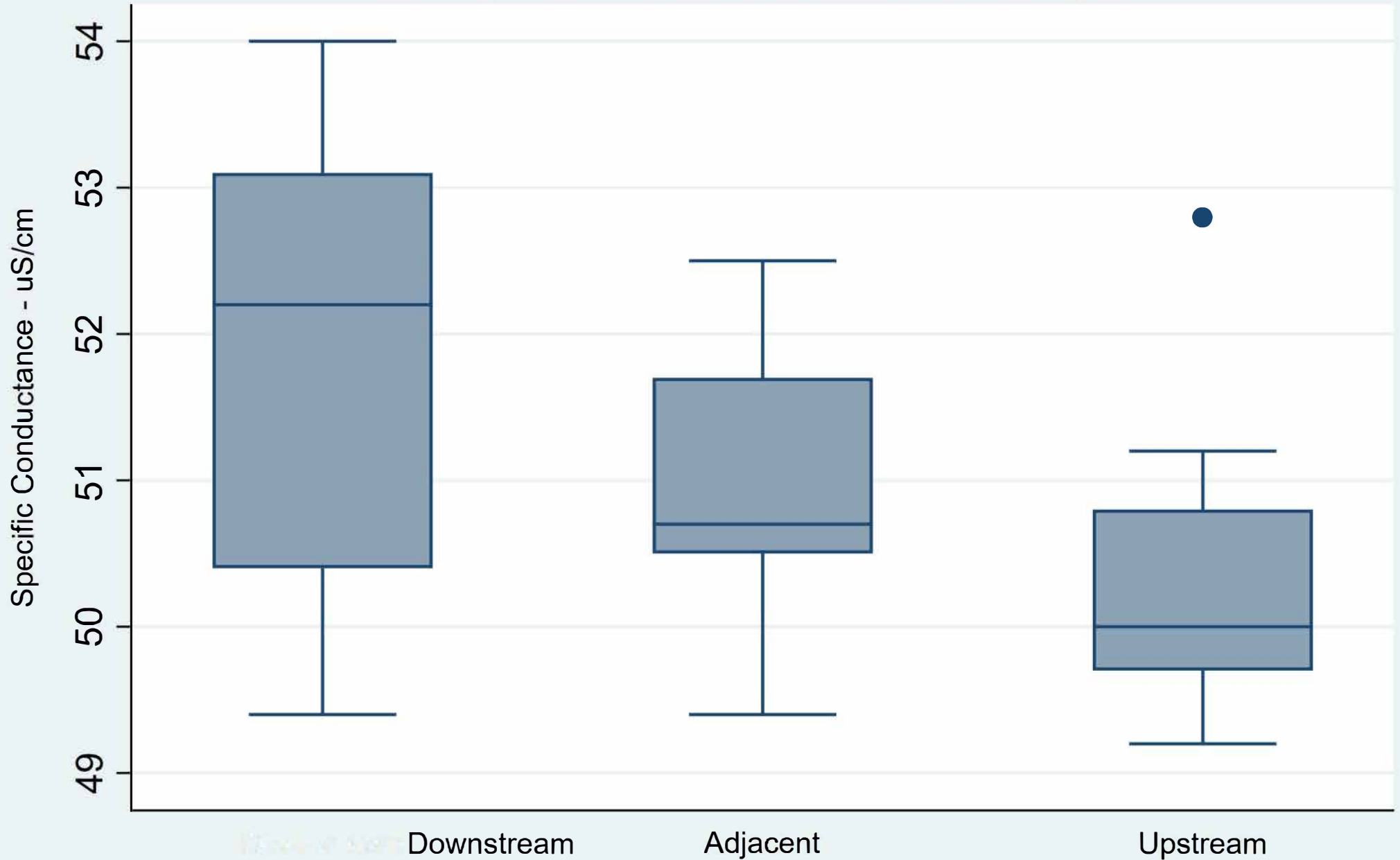
TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = HSK - Sample Date 4/24/2019

# Specific Conductance by Relative Location

TVA-Kingston Fossil Plant- TDEC Order Seep Investigation

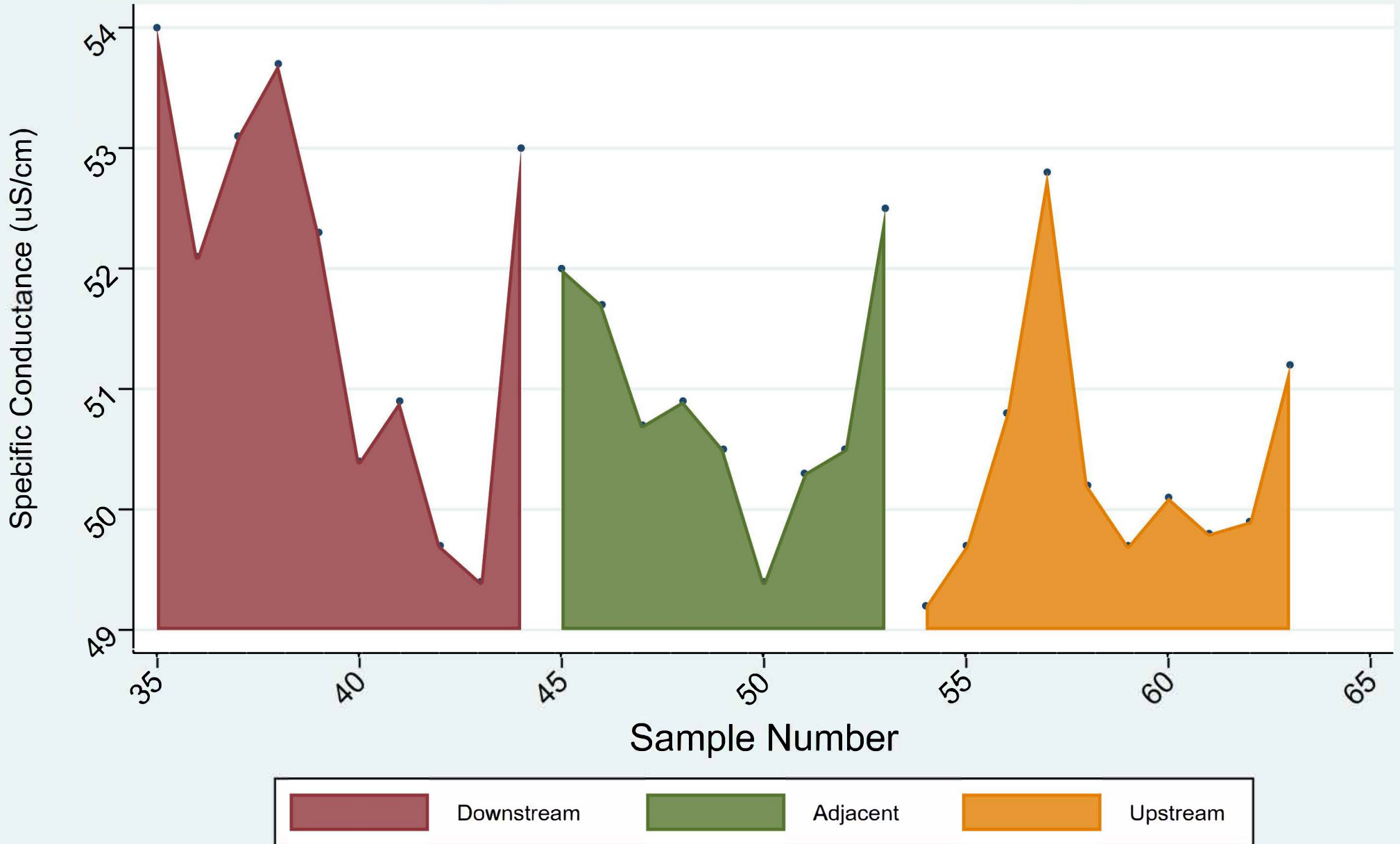


Historic Seep/AOC = HSK - Sample Date 4/24/2019



# Time Series - Specific Conductance

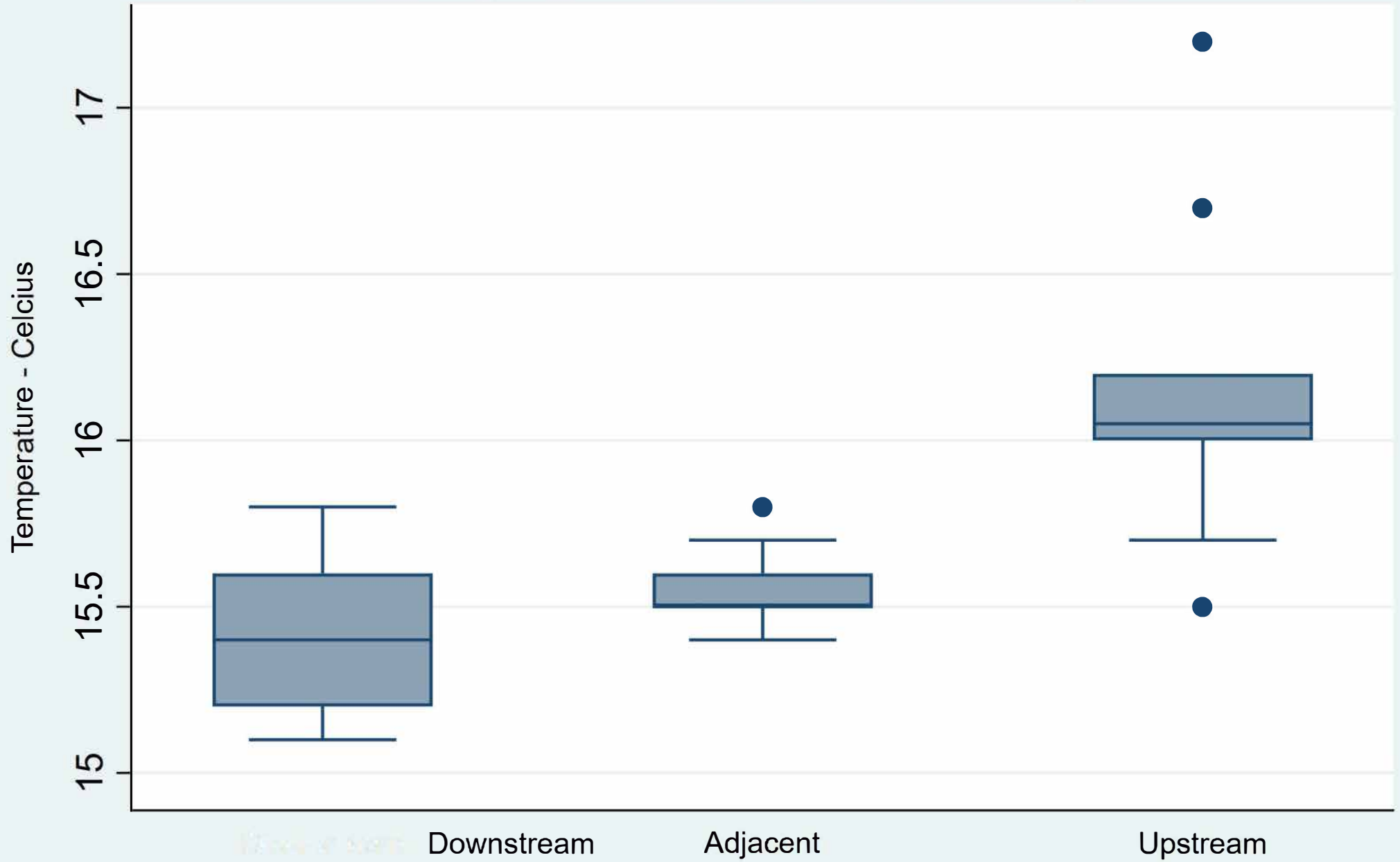
TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = HSK - Sample Date 4/24/2019

# Temperature by Relative Location

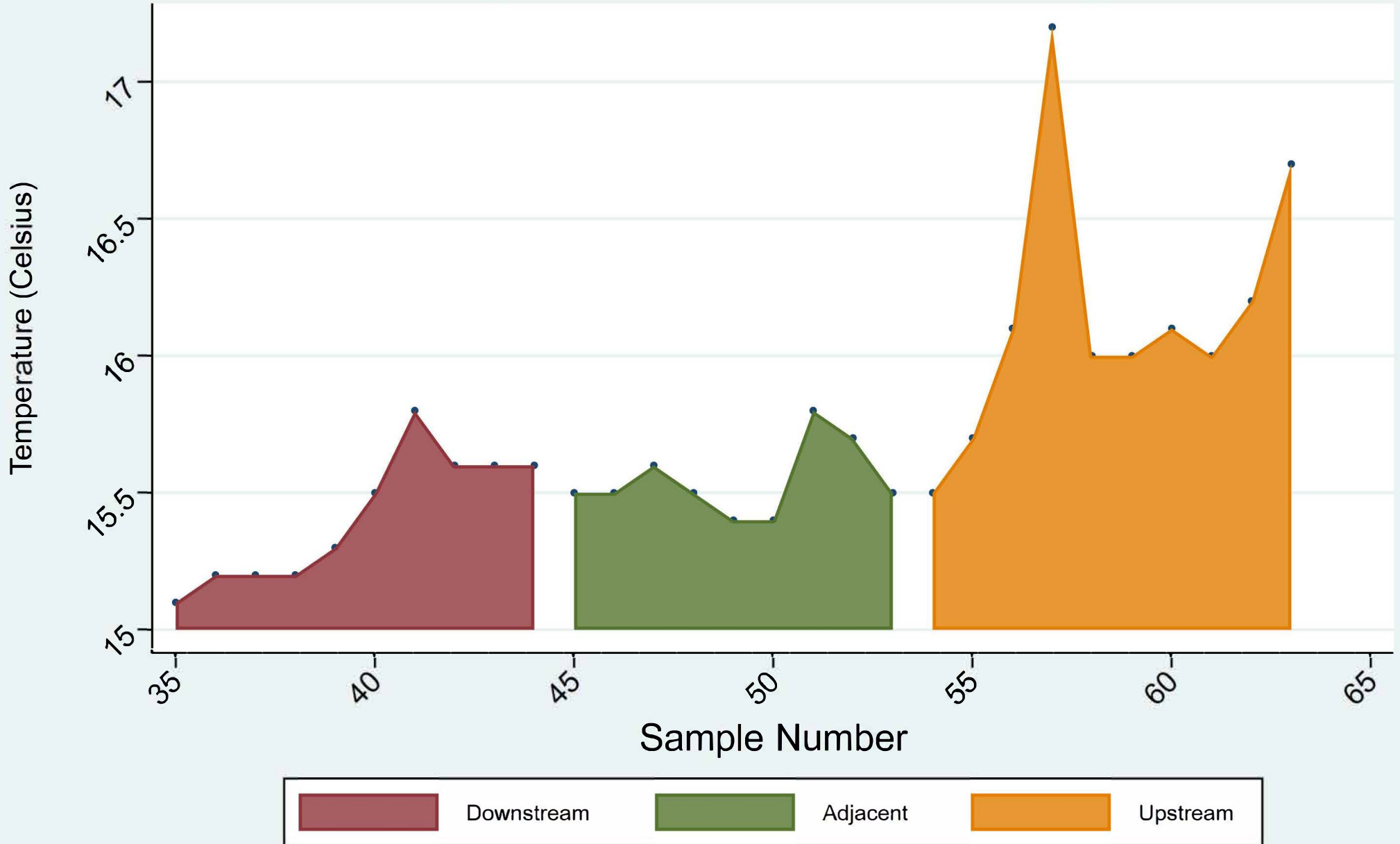
TVA-Kingston Fossil Plant- TDEC Order Seep Investigation



Historic Seep/AOC = HSK - Sample Date 4/24/2019

# Time Series - Temperature

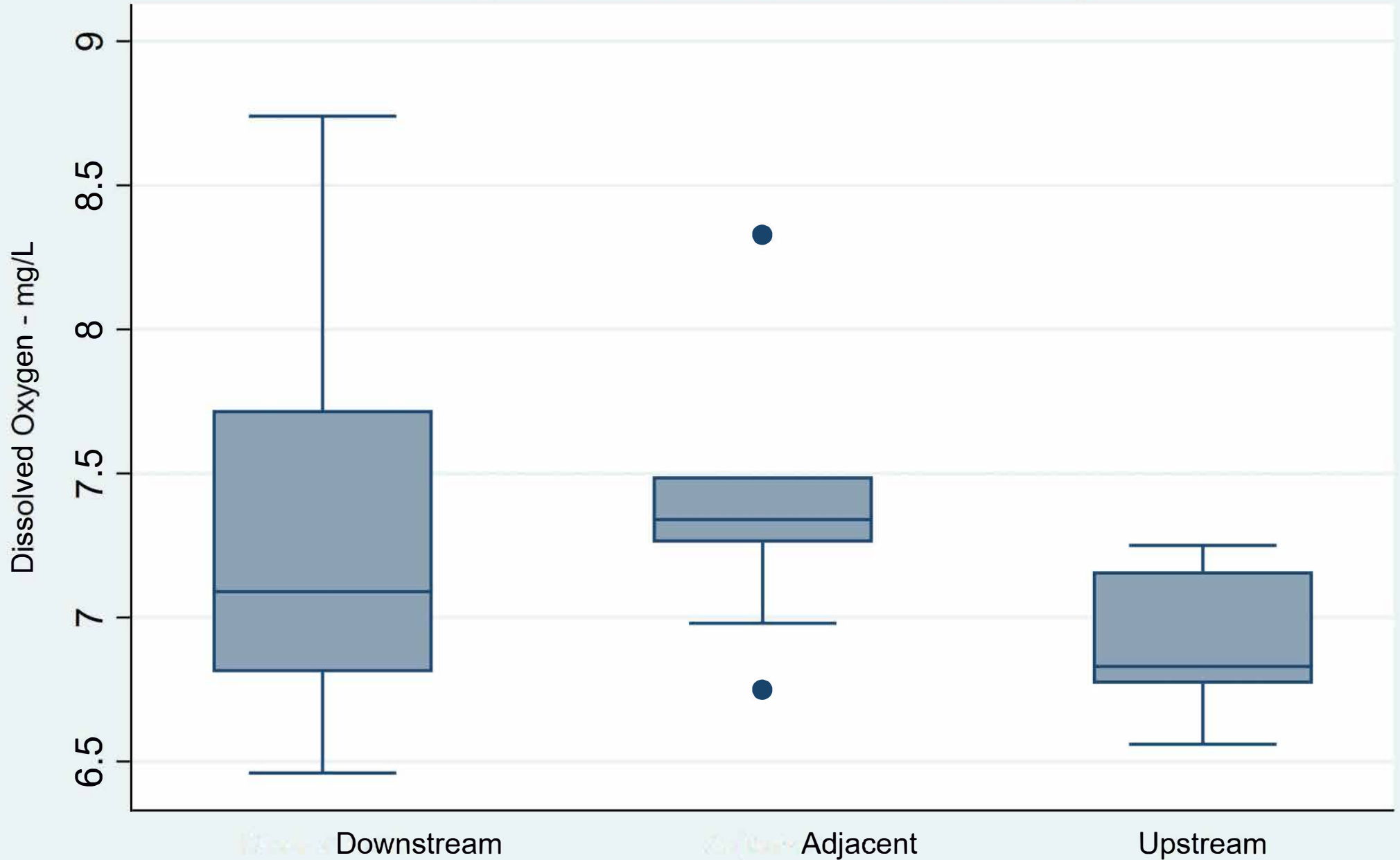
TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = HSK - Sample Date 4/24/2019

# Dissolved Oxygen by Relative Location

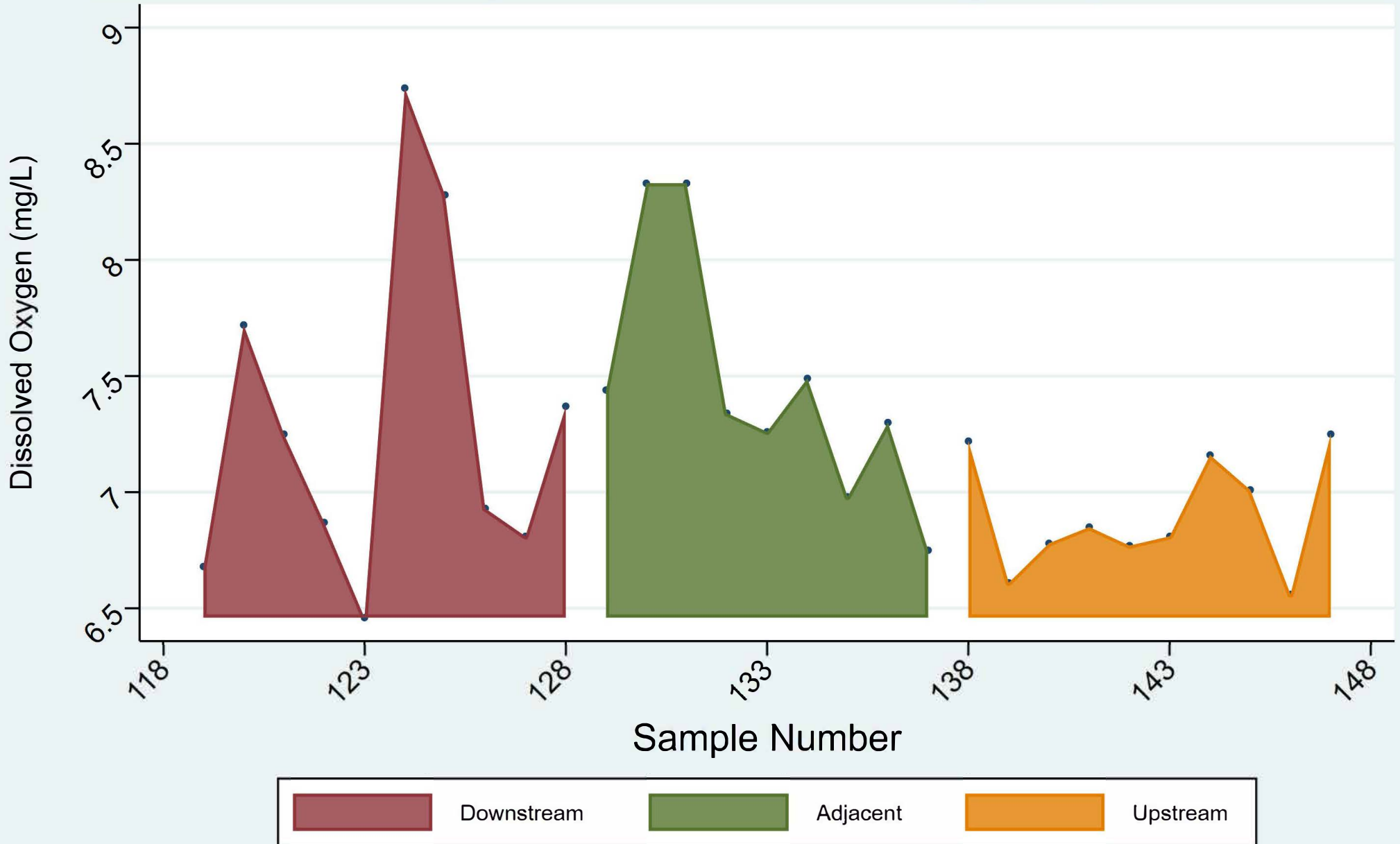
## TVA-Kingston Fossil Plant- TDEC Order Seep Investigation



Historic Seep/AOC = Cluster-(M/AOC#3,HSD) - Sample Date 4/25/2019

# Time Series - Dissolved Oxygen

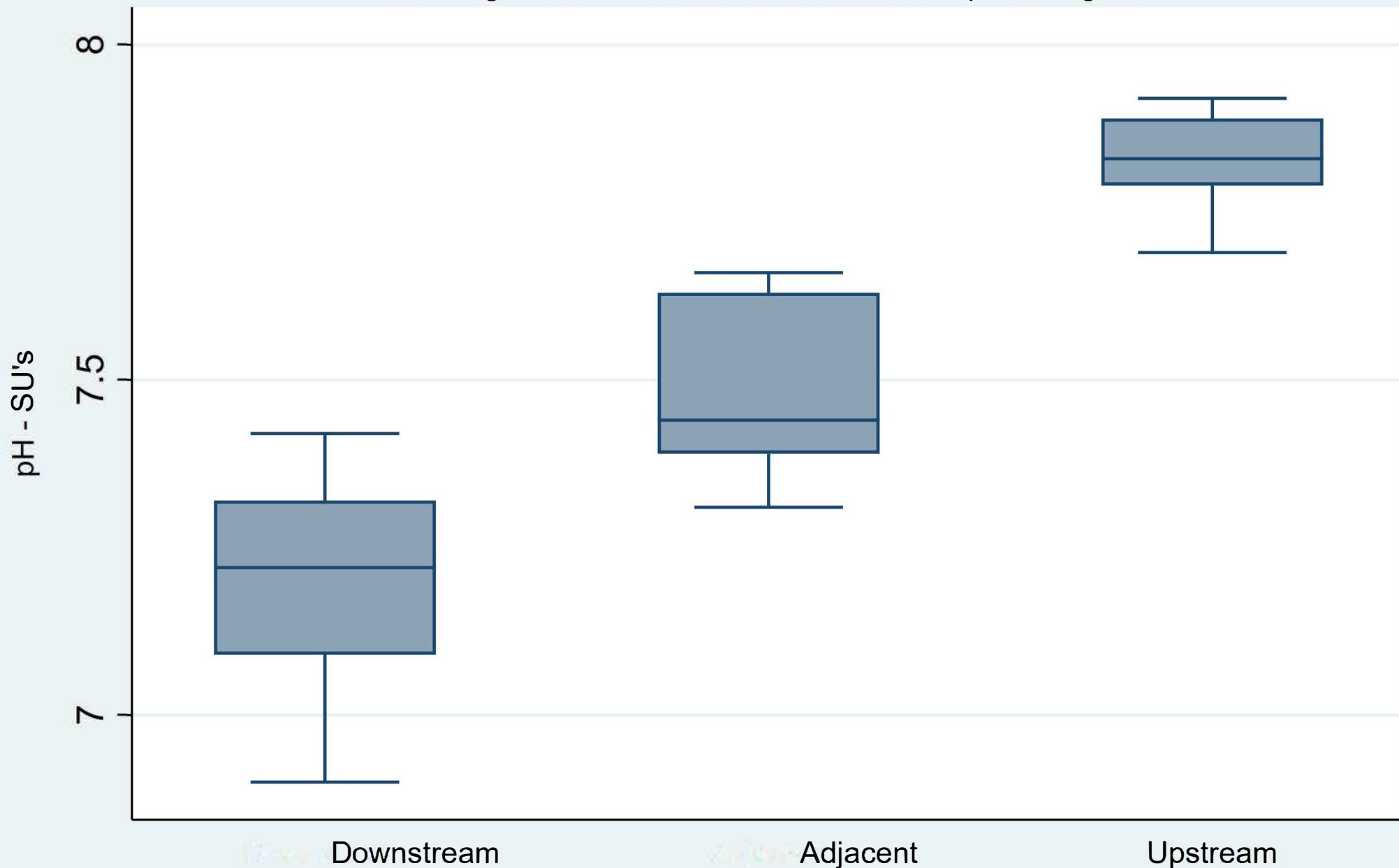
TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = Cluster-(M/AOC#3,HSD) - Sample Date 4/25/2019

# pH by Relative Location

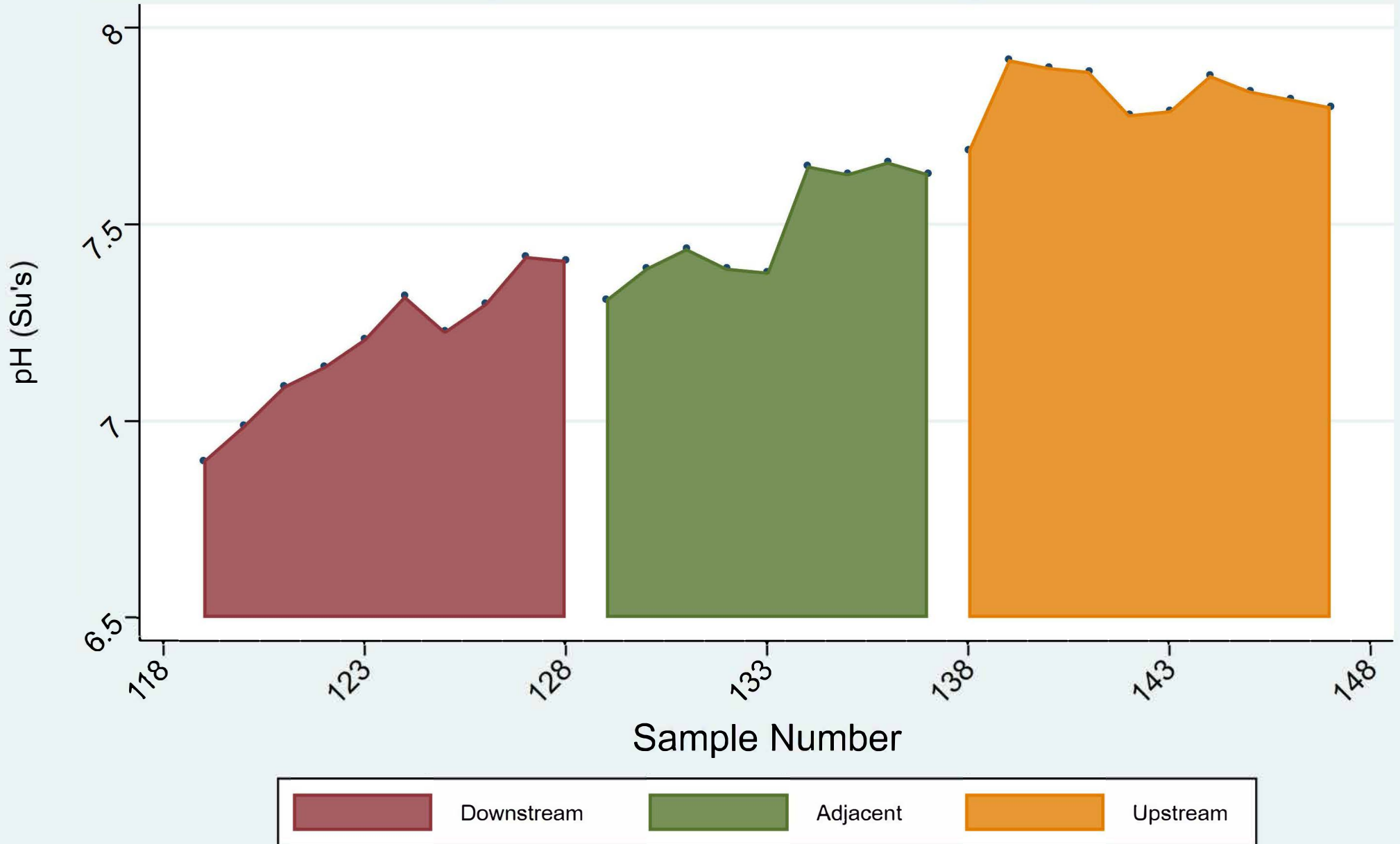
TVA-Kingston Fossil Plant- TDEC Order Seep Investigation



Historic Seep/AOC = Cluster (M/AOC#3,HSD) - Sample Date 4/25/2019

# Time Series - pH

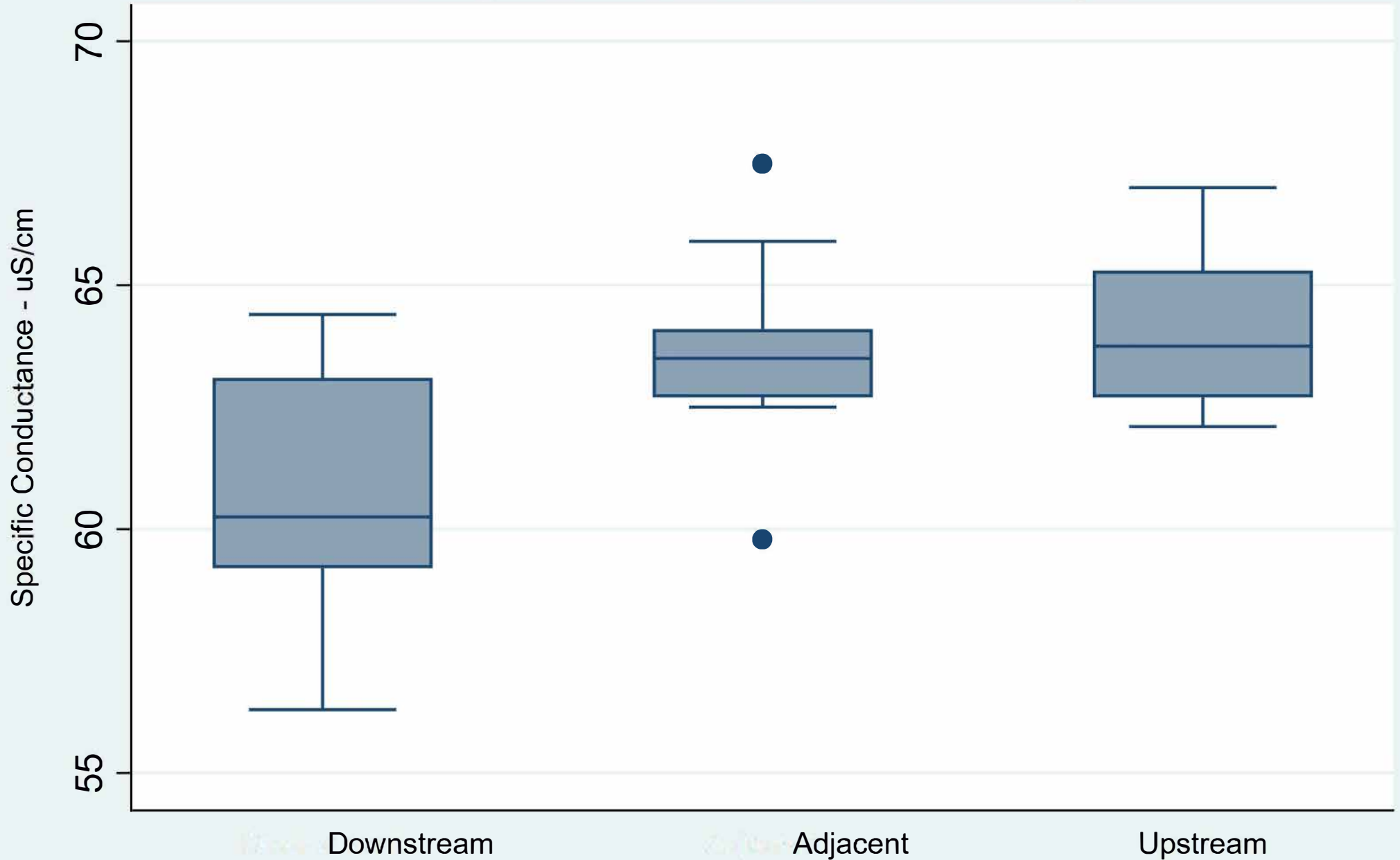
TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = Cluster (M/AOC#3,HSD) - Sample Date 4/25/2019

# Specific Conductance by Relative Location

TVA-Kingston Fossil Plant- TDEC Order Seep Investigation

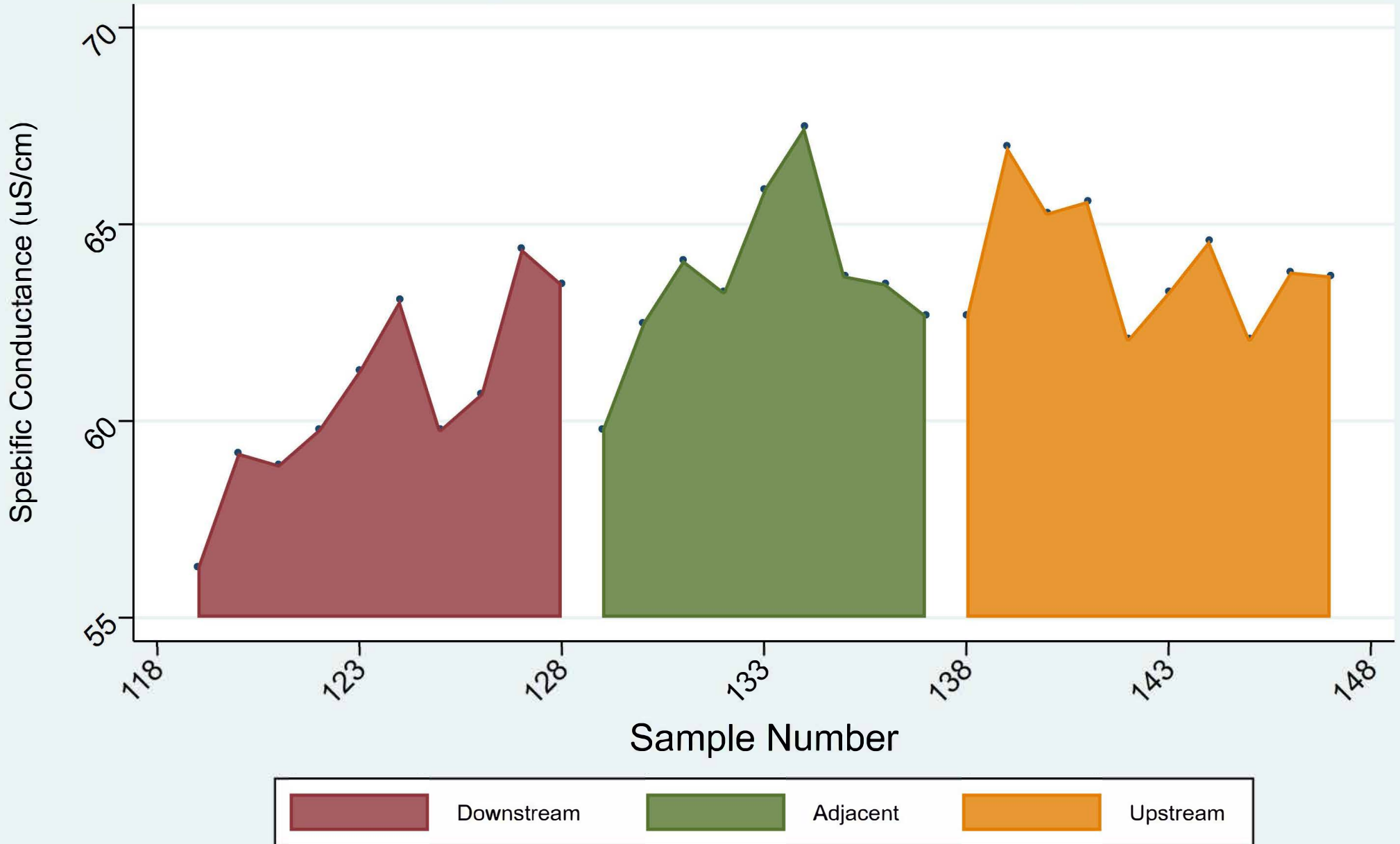


Historic Seep/AOC = Cluster (M/AOC#3,HSD) - Sample Date 4/25/2019



# Time Series - Specific Conductance

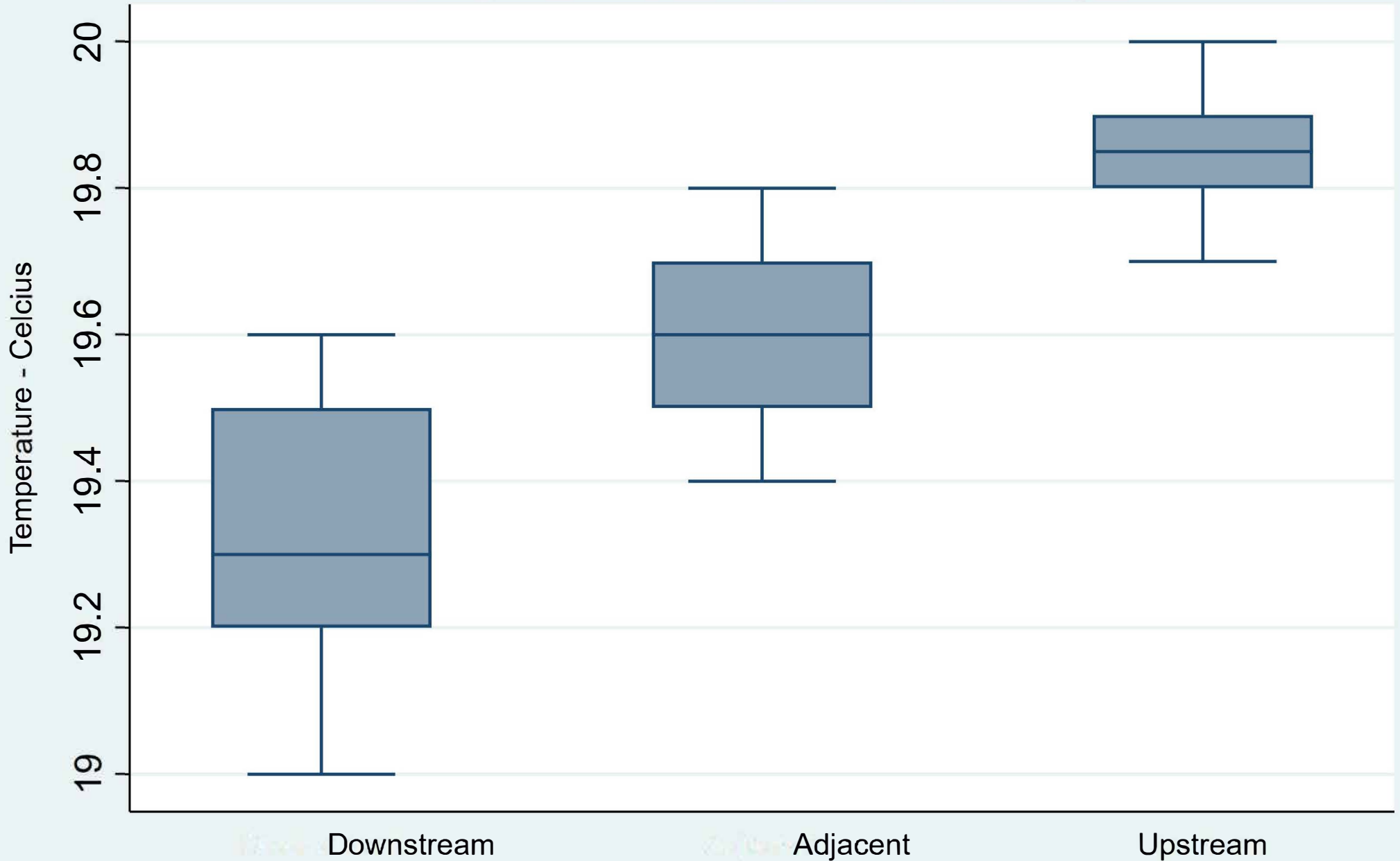
TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = Cluster (M/AOC#3,HSD) - Sample Date 4/25/2019

# Temperature by Relative Location

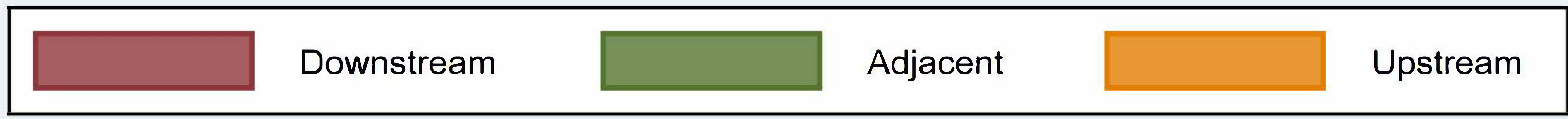
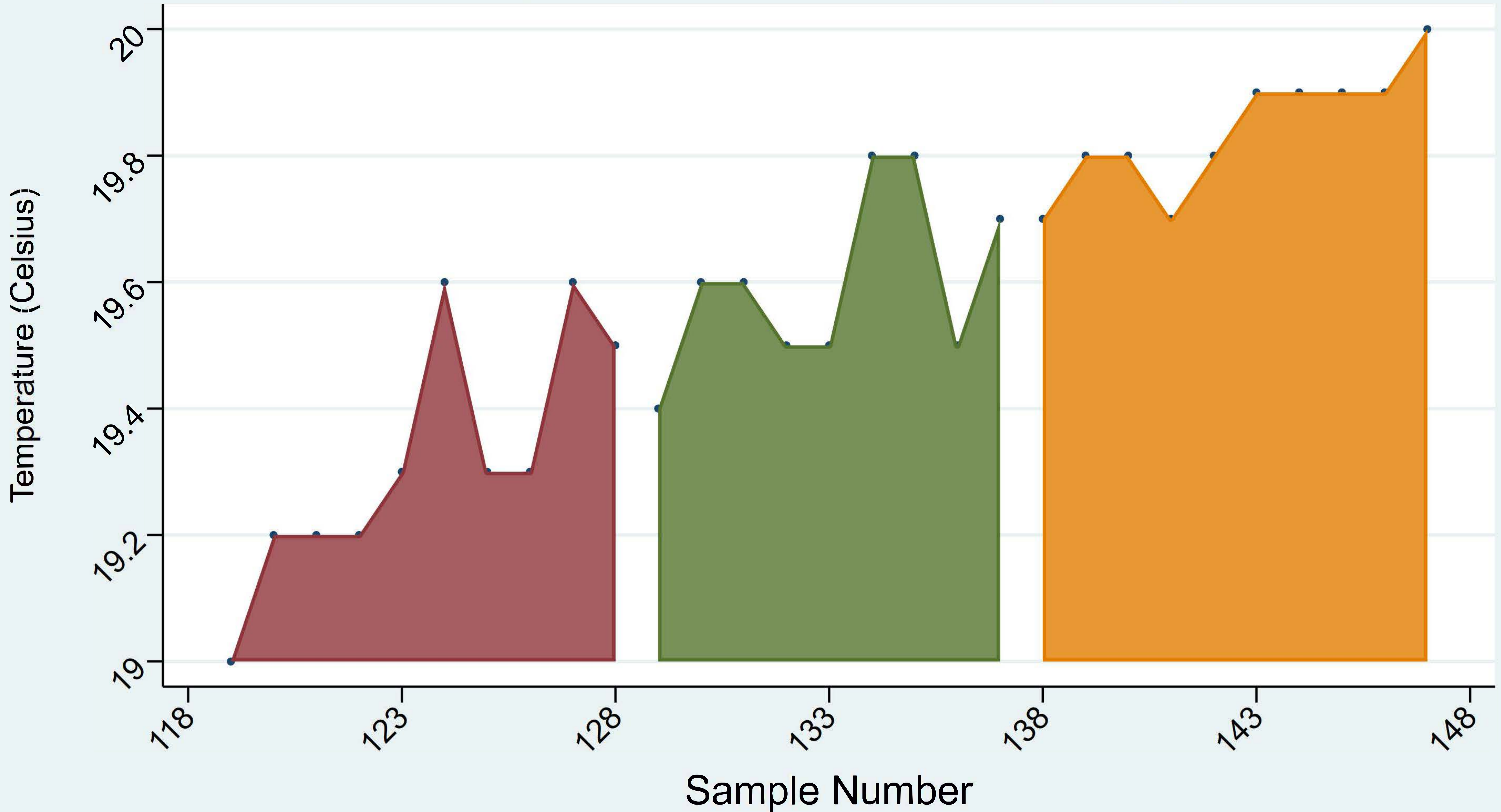
TVA-Kingston Fossil Plant- TDEC Order Seep Investigation



Historic Seep/AOC = Cluster (M/AOC#3,HSD) - Sample Date 4/25/2019

# Time Series - Temperature

TVA-Kingston Fossil Plant - TDEC Order Seep Investigation



Historic Seep/AOC = Cluster (M/AOC#3,HSD) - Sample Date 4/25/2019

# **ATTACHMENT D.2**

## **Summary of Descriptive Statistics**

# KIF Seep Investigation –Summary Statistics for Areas of Concern (AOCs)

Kingston Fossil Plant - Seep Investigation - Summary Statistics								
Dissolved Oxygen - milligrams per liter (mg/L)								
Historical Seep/ AOC Location	Relative Location to AOC	Number of Samples	Minimum	Maximum	Mean	Standard Deviation	Median	95th Percentile
L/AOC#2	Downstream	10	7.94	8.95	8.38	0.28	8.37	8.95
	Adjacent	8	8.06	9.12	8.39	0.37	8.28	9.12
	Upstream	11	7.49	8.68	7.96	0.34	8.00	8.68
HS Cluster-(C,R)	Downstream	10	8.77	9.70	9.18	0.26	9.19	9.70
	Adjacent	8	8.22	8.54	8.38	0.10	8.39	8.54
	Upstream	10	7.38	8.94	8.19	0.51	8.17	8.94
HSK	Downstream	10	7.58	8.89	8.51	0.37	8.64	8.89
	Adjacent	9	7.75	8.91	8.15	0.34	8.04	8.91
	Upstream	10	7.64	9.30	8.47	0.63	8.74	9.30
M/AOC#3,HSD	Downstream	10	6.46	8.74	7.31	0.74	7.09	8.74
	Adjacent	9	6.75	8.33	7.47	0.54	7.34	8.33
	Upstream	10	6.56	7.25	6.90	0.25	6.83	7.25
Control (4/24/2019)		20	7.22	8.29	7.79	0.24	7.80	8.17
Control (4/25/2019)		20	7.27	8.68	8.14	0.41	8.22	8.67
Intermediate Areas		17	7.01	9.21	8.21	0.65	8.09	9.21

# KIF Seep Investigation –Summary Statistics for Areas of Concern (AOCs)

<b>Kingston Fossil Plant - Seep Investigation - Summary Statistics</b>								
<b>pH (Standard Units)</b>								
<b>Historical Seep/ AOC Location</b>	<b>Relative Location to AOC</b>	<b>Number of Samples</b>	<b>Minimum</b>	<b>Maximum</b>	<b>Mean</b>	<b>Standard Deviation</b>	<b>Median</b>	<b>95th Percentile</b>
L/AOC#2	Downstream	10	6.59	6.89	6.76	0.10	6.78	6.89
	Adjacent	8	6.84	6.95	6.91	0.04	6.91	6.95
	Upstream	11	6.26	6.98	6.77	0.22	6.87	6.98
HS Cluster-(C,R)	Downstream	10	6.98	7.28	7.16	0.09	7.16	7.28
	Adjacent	8	7.28	7.46	7.39	0.07	7.42	7.46
	Upstream	10	7.23	7.61	7.35	0.12	7.30	7.61
HSK	Downstream	10	6.93	7.17	7.04	0.07	7.03	7.17
	Adjacent	9	7.01	7.14	7.07	0.05	7.07	7.14
	Upstream	10	6.90	7.08	6.98	0.06	6.96	7.08
M/AOC#3,HSD	Downstream	10	6.90	7.42	7.20	0.17	7.22	7.42
	Adjacent	9	7.31	7.66	7.50	0.14	7.44	7.66
	Upstream	10	7.69	7.92	7.83	0.07	7.83	7.92
Control (4/24/2019)		20	7.10	7.24	7.16	0.04	7.15	7.23
Control (4/25/2019)		20	7.29	7.48	7.40	0.05	7.40	7.47
Intermediate Areas		17	6.29	7.88	7.22	0.47	7.23	7.88



# KIF Seep Investigation –Summary Statistics for Areas of Concern (AOCs)

<b>Kingston Fossil Plant - Seep Investigation - Summary Statistics</b>								
<b>Specific Conductance - microsiemens per centimeter (µS/cm)</b>								
<b>Historical Seep/ AOC Location</b>	<b>Relative Location to AOC</b>	<b>Number of Samples</b>	<b>Minimum</b>	<b>Maximum</b>	<b>Mean</b>	<b>Standard Deviation</b>	<b>Median</b>	<b>95th Percentile</b>
L/AOC#2	Downstream	10	47.4	56.8	50.1	3.03	49.1	56.8
	Adjacent	8	46.5	63.3	52.0	5.98	49.5	63.3
	Upstream	11	46.8	55.3	49.4	2.78	48.7	55.3
HS Cluster-(C,R)	Downstream	10	47.6	50.5	48.7	1.10	48.2	50.5
	Adjacent	8	47.4	53.2	50.8	1.72	51.2	53.2
	Upstream	10	45.4	56.0	49.3	2.84	48.8	56.0
HSK	Downstream	10	49.4	54.0	51.9	1.66	52.2	54.0
	Adjacent	9	49.4	52.5	50.9	0.96	50.7	52.5
	Upstream	10	49.2	52.8	50.3	1.04	50.0	52.8
M/AOC#3,HSD	Downstream	10	56.3	64.4	60.7	2.45	60.3	64.4
	Adjacent	9	59.8	67.5	63.7	2.16	63.5	67.5
	Upstream	10	62.1	67.0	64.0	1.60	63.8	67.0
Control (4/24/2019)		20	46.5	47.7	47.0	0.33	47.1	47.6
Control (4/25/2019)		20	48.7	52.3	50.2	0.84	50.1	52.0
Intermediate Areas		17	46.3	64.4	55.8	5.70	56.9	64.4

# KIF Seep Investigation –Summary Statistics for Areas of Concern (AOCs)

Kingston Fossil Plant - Seep Investigation - Summary Statistics Temperature (Celsius)								
Historical Seep/ AOC Location	Relative Location to AOC	Number of Samples	Minimum	Maximum	Mean	Standard Deviation	Median	95th Percentile
L/AOC #2	Downstream	10	15.1	15.5	15.3	0.14	15.3	15.5
	Adjacent	8	14.8	15.3	15.0	0.16	15.0	15.3
	Upstream	11	14.4	15.0	14.7	0.23	14.6	15.0
HS Cluster-(C,R)	Downstream	10	15.1	15.6	15.3	0.22	15.2	15.6
	Adjacent	8	15.1	15.7	15.5	0.19	15.5	15.7
	Upstream	10	15.1	15.4	15.2	0.09	15.2	15.4
HSK	Downstream	10	15.1	15.8	15.4	0.24	15.4	15.8
	Adjacent	9	15.4	15.8	15.5	0.13	15.5	15.8
	Upstream	10	15.5	17.2	16.2	0.48	16.1	17.2
M/AOC#3,HSD	Downstream	10	19.0	19.6	19.3	0.19	19.3	19.6
	Adjacent	9	19.4	19.8	19.6	0.14	19.6	19.8
	Upstream	10	19.7	20.0	19.8	0.10	19.9	20.0
Control (4/24/2019)		20	16.5	18.4	17.2	0.49	17.2	18.2
Control (4/25/2019)		20	18.8	19.5	19.2	0.17	19.2	19.5
Intermediate Areas		17	14.9	19.8	16.8	2.09	15.6	19.8



## p-Values by Areas of Concern (AOCs)

Kingston Fossil Plant Seep Investigation - Summary of Hypothesis Testing						
Historical Seep/AOC Location	Relative Location to Historical Seep	Number of Samples	Dissolved Oxygen (mg/L)	pH (Standard Units)	Specific Conductance (µS/cm)	Temperature (Celsius)
			p-value	p-value	p-value	p-value
L/AOC#2	Adjacent v Upstream	8/11	0.9894	0.0699	0.1426	<b>0.0027</b>
HSK	Adjacent v Upstream	9/10	0.0921	<b>0.0022</b>	0.1023	<b>0.0032</b>
HS Cluster-(C,R)	Adjacent v Upstream	8/10	0.8677	0.3658	0.0928	0.0081
M/AOC#3,HSD	Adjacent v Upstream	9/10	0.9926	<b>0.0000</b>	0.6530	<b>0.0008</b>

Adjusted Significance Level (SWFPR/#Statistical Tests):  $0.10/16 = 0.00625$   
 Bold and Highlight indicate that p-value is below adjusted significance level, reject null and conclude statistically significant difference.  
 (mg/L = milligrams per liter  
 µS/cm = microsiemens per centimeter  
 AOC = Area of Concern

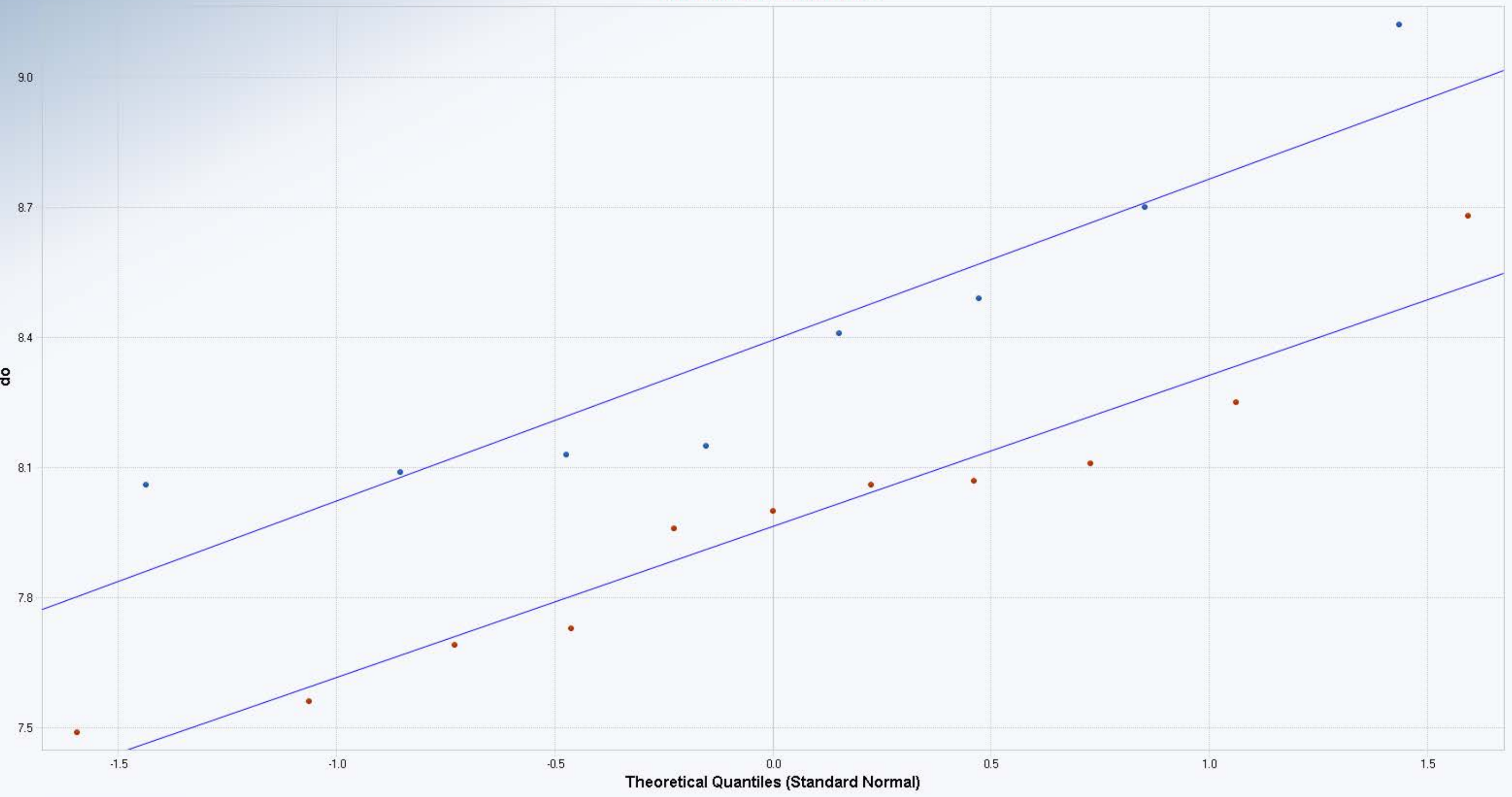
# **ATTACHMENT D.3**

## **Normal Q-Q Plots**

SEEP SAMPLING AND ANALYSIS REPORT

<b>Key to Normal Quantile – Quantile (Q-Q Plots)</b>		
<b>Parameter Abbreviations</b>	<b>Parameter</b>	<b>Units</b>
do	Dissolved Oxygen	milligrams per liter (mg/L)
ph	pH	standard units (SU's)
sc	Specific Conductance	microsiemens per centimeter ( $\mu\text{S}/\text{cm}$ )
temp	Temperature	Celsius ( $^{\circ}\text{C}$ )
<b>Additional Abbreviations</b>		
"a "	Measurements collected adjacent to Historic Seep or Area of Concern	
"u "	Measurements collected upstream of Historic Seep or Area of Concern	

# Normal Q-Q Plot for do



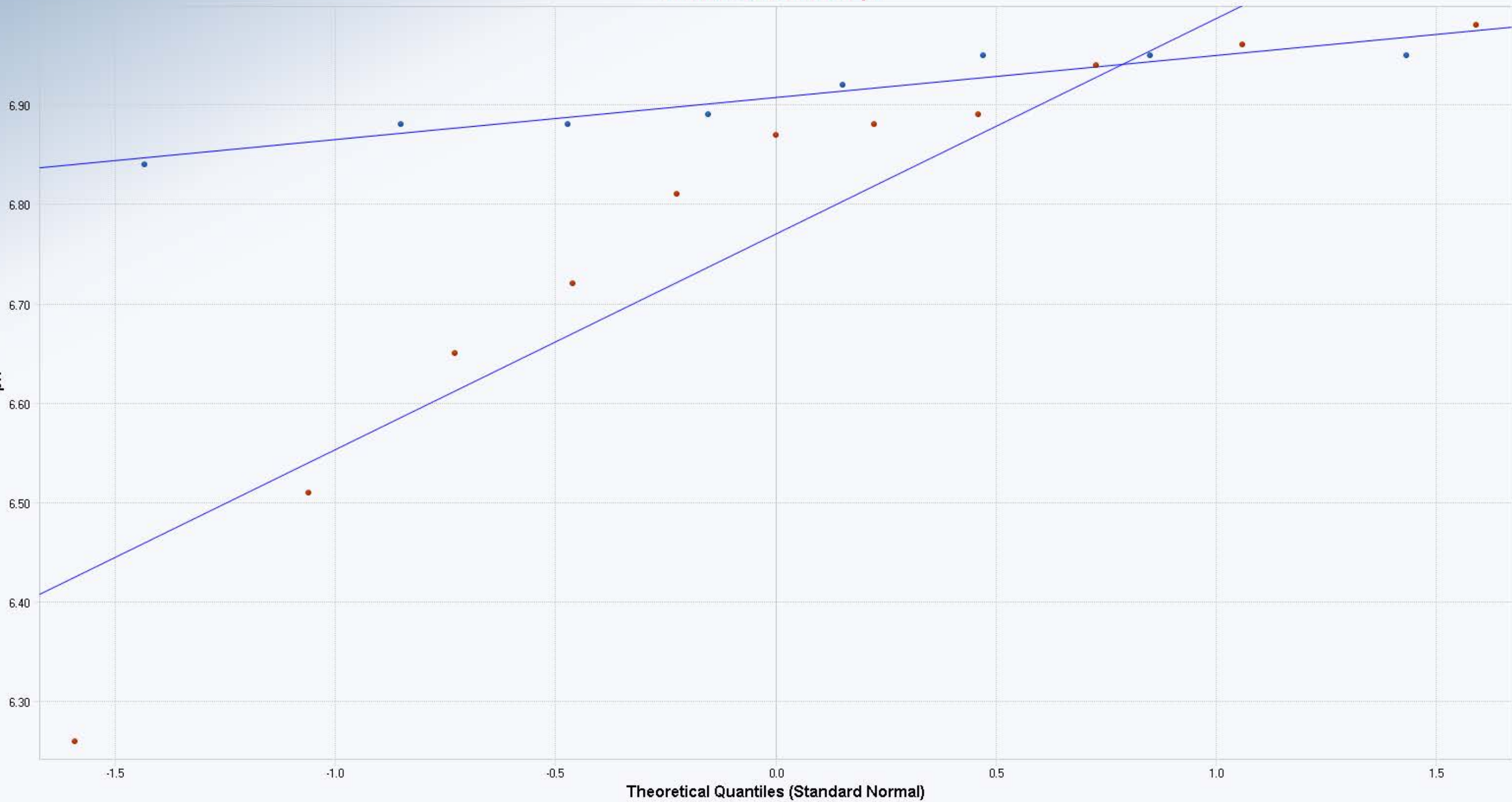
● a\_aoc ● u\_aoc

**a\_aoc**  
n = 8  
Mean = 8.394  
Sd = 0.371  
Slope = 0.371  
Intercept = 8.394  
Correlation, R = 0.931  
Shapiro-Wilk Test  
Exact Test Value = 0.863  
Critical Val(0.05) = 0.818  
Data Appear Normal  
Approx. Test Value = 0.867  
p-Value = 0.144

**u\_aoc**  
n = 11  
Mean = 7.964  
Sd = 0.34  
Slope = 0.349  
Intercept = 7.964  
Correlation, R = 0.97  
Shapiro-Wilk Test  
Exact Test Value = 0.947  
Critical Val(0.05) = 0.850  
Data Appear Normal  
Approx. Test Value = 0.944  
p-Value = 0.543

■ Best Fit Line

# Normal Q-Q Plot for ph



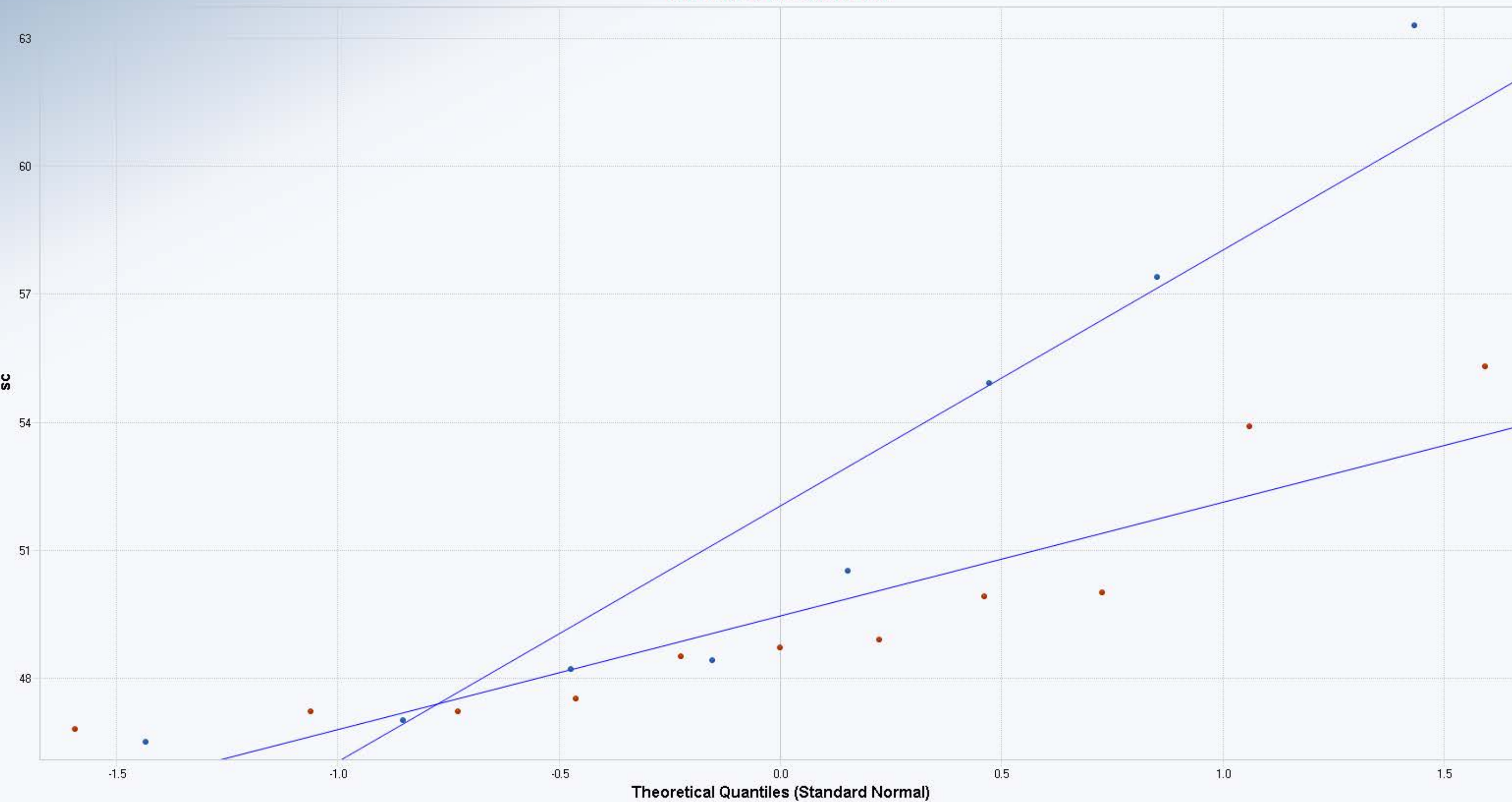
● a\_aoc ● u\_aoc

**a\_aoc**  
n = 8  
Mean = 6.908  
Sd = 0.0413  
Slope = 0.0421  
Intercept = 6.908  
Correlation, R = 0.948  
Shapiro-Wilk Test  
Exact Test Value = 0.881  
Critical Val(0.05) = 0.818  
Data Appear Normal  
Approx. Test Value = 0.897  
p-Value = 0.275

**u\_aoc**  
n = 11  
Mean = 6.77  
Sd = 0.222  
Slope = 0.217  
Intercept = 6.77  
Correlation, R = 0.922  
Shapiro-Wilk Test  
Exact Test Value = 0.852  
Critical Val(0.05) = 0.850  
Data Appear Normal  
Approx. Test Value = 0.851  
p-Value = 0.0444

■ Best Fit Line

### Normal Q-Q Plot for sc



● a\_aoc ● u\_aoc

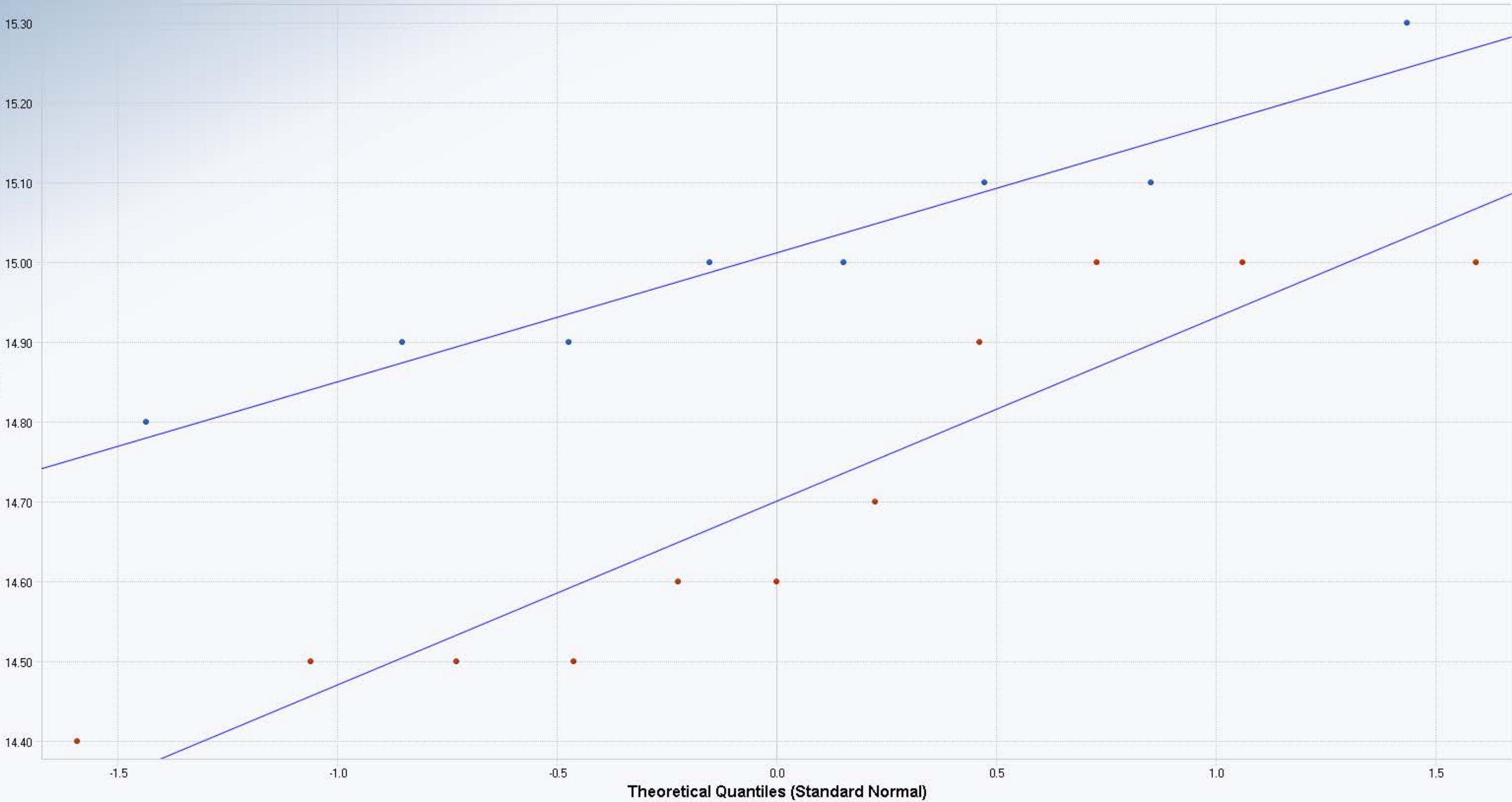
**a\_aoc**  
n = 8  
Mean = 52.03  
Sd = 5.978  
Slope = 6.014  
Intercept = 52.03  
Correlation, R = 0.936  
Shapiro-Wilk Test  
Exact Test Value = 0.869  
Critical Val(0.05) = 0.818  
Data Appear Normal  
Approx. Test Value = 0.876  
p-Value = 0.174

**u\_aoc**  
n = 11  
Mean = 49.45  
Sd = 2.779  
Slope = 2.68  
Intercept = 49.45  
Correlation, R = 0.91  
Shapiro-Wilk Test  
Exact Test Value = 0.825  
Critical Val(0.05) = 0.850  
Data Not Normal  
Approx. Test Value = 0.828  
p-Value = 0.0233

■ Best Fit Line



### Normal Q-Q Plot for temp



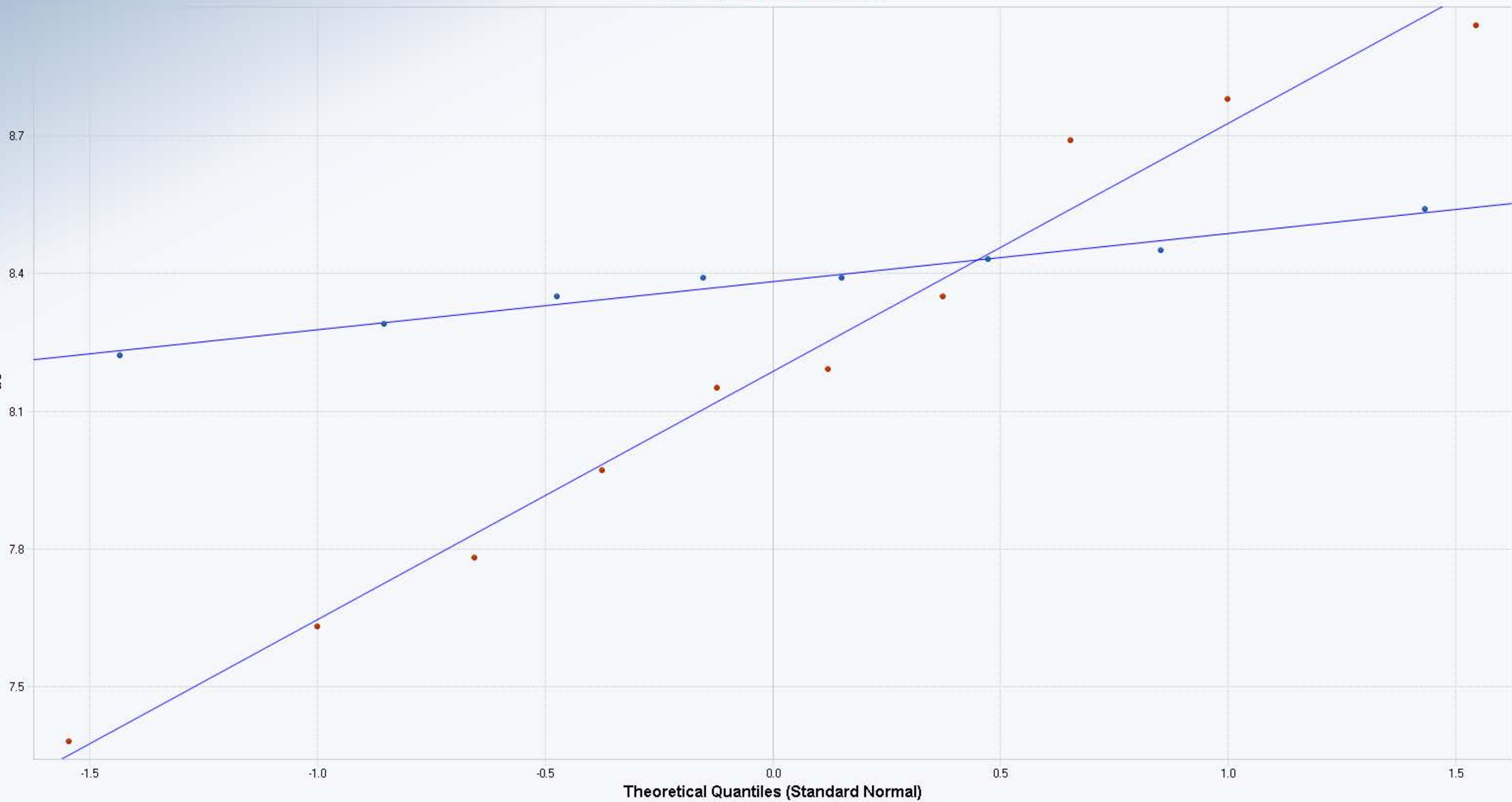
● a\_aoc ● u\_aoc

**a\_aoc**  
n = 8  
Mean = 15.01  
Sd = 0.155  
Slope = 0.162  
Intercept = 15.01  
Correlation, R = 0.971  
Shapiro-Wilk Test  
Exact Test Value = 0.952  
Critical Val(0.05) = 0.818  
Data Appear Normal  
Approx. Test Value = 0.945  
p-Value = 0.66

**u\_aoc**  
n = 11  
Mean = 14.7  
Sd = 0.232  
Slope = 0.231  
Intercept = 14.7  
Correlation, R = 0.938  
Shapiro-Wilk Test  
Exact Test Value = 0.854  
Critical Val(0.05) = 0.850  
Data Appear Normal  
Approx. Test Value = 0.871  
p-Value = 0.0797

■ Best Fit Line

# Normal Q-Q Plot for do



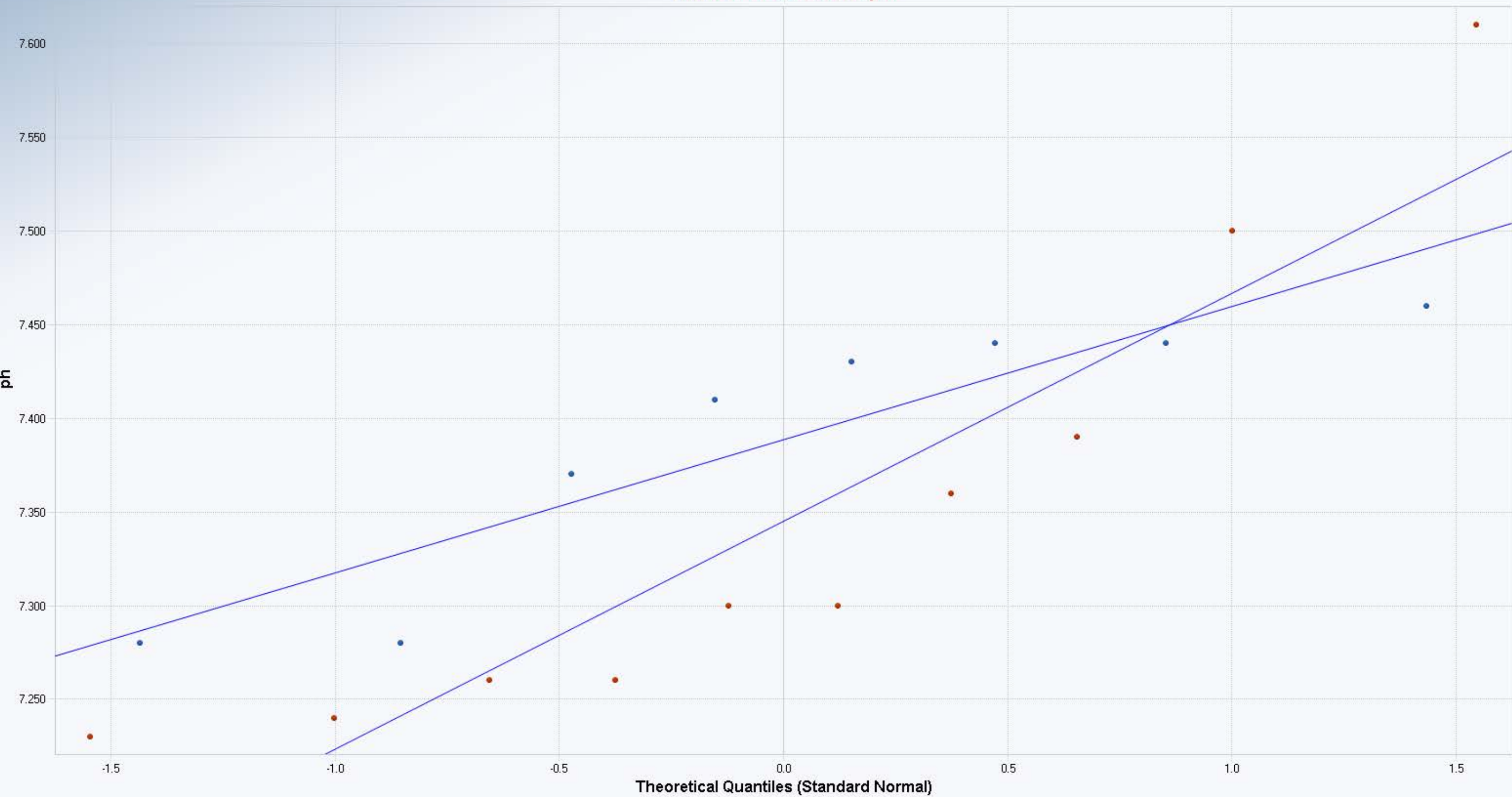
● a\_cr ● u\_cr

**a\_cr**  
n = 8  
Mean = 8.383  
Sd = 0.0984  
Slope = 0.104  
Intercept = 8.383  
Correlation, R = 0.988  
Shapiro-Wilk Test  
Exact Test Value = 0.984  
Critical Val(0.05) = 0.818  
Data Appear Normal  
Approx. Test Value = 0.978  
p-Value = 0.946

**u\_cr**  
n = 10  
Mean = 8.186  
Sd = 0.514  
Slope = 0.541  
Intercept = 8.186  
Correlation, R = 0.991  
Shapiro-Wilk Test  
Exact Test Value = 0.969  
Critical Val(0.05) = 0.842  
Data Appear Normal  
Approx. Test Value = 0.979  
p-Value = 0.957  
■ Best Fit Line



### Normal Q-Q Plot for ph



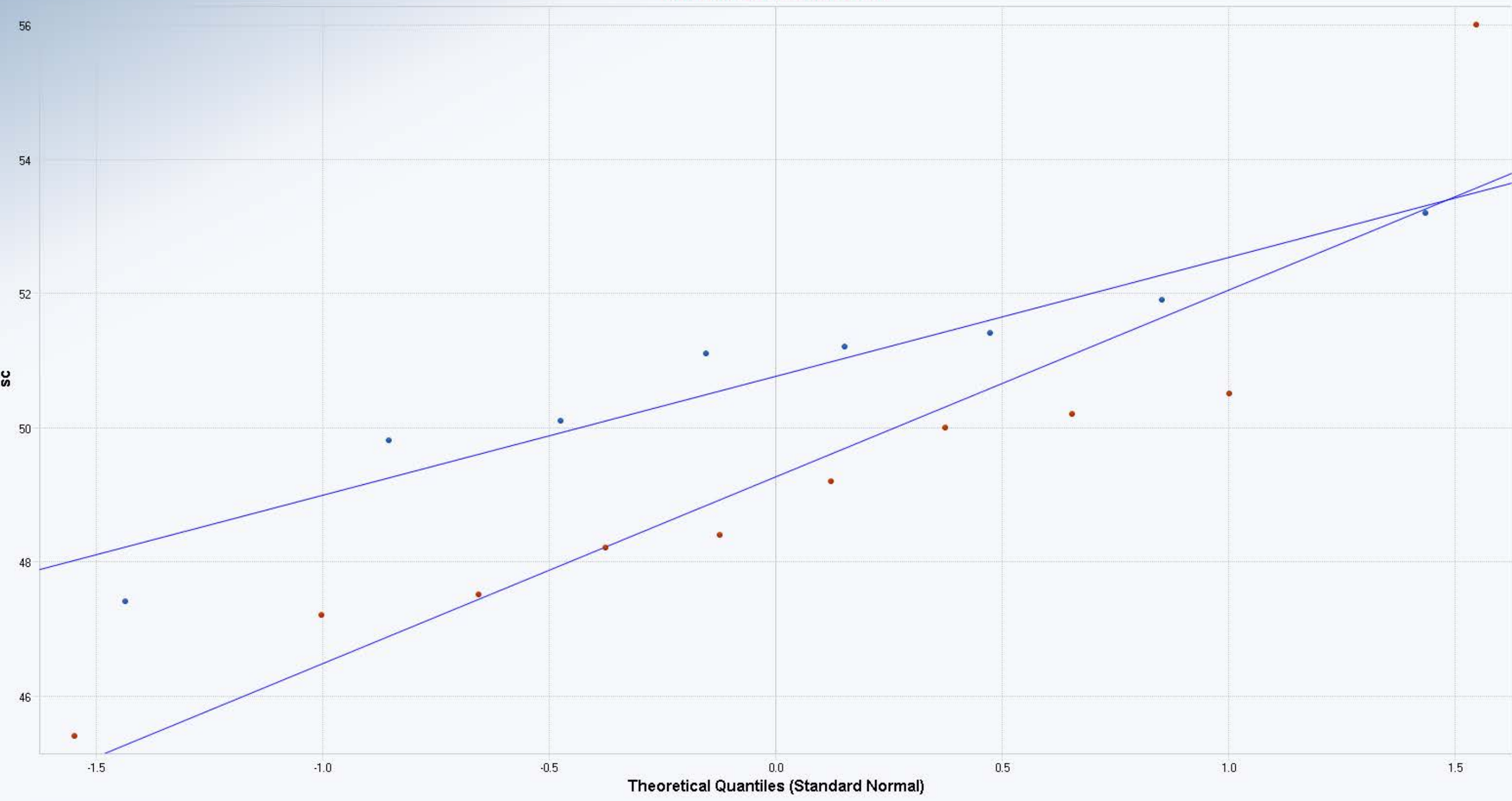
● a\_cr ● u\_cr

**a\_cr**  
n = 8  
Mean = 7.389  
Sd = 0.0722  
Slope = 0.0711  
Intercept = 7.389  
Correlation, R = 0.916  
Shapiro-Wilk Test  
Exact Test Value = 0.819  
Critical Val(0.05) = 0.818  
Data Appear Normal  
Approx. Test Value = 0.837  
p-Value = 0.0716

**u\_cr**  
n = 10  
Mean = 7.345  
Sd = 0.124  
Slope = 0.122  
Intercept = 7.345  
Correlation, R = 0.922  
Shapiro-Wilk Test  
Exact Test Value = 0.848  
Critical Val(0.05) = 0.842  
Data Appear Normal  
Approx. Test Value = 0.850  
p-Value = 0.0564

■ Best Fit Line

### Normal Q-Q Plot for sc



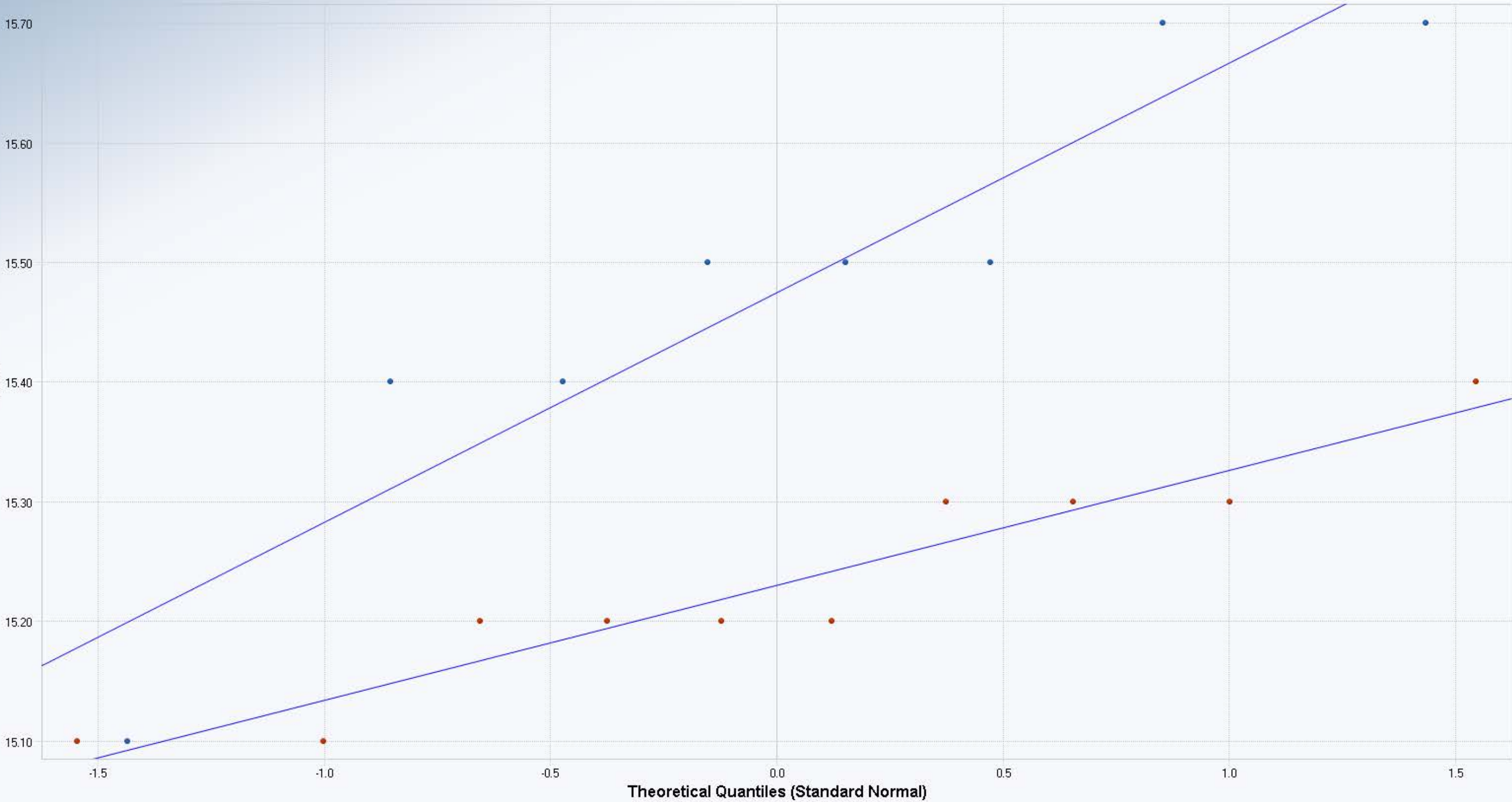
● a\_cr ● u\_cr

**a\_cr**  
n = 8  
Mean = 50.76  
Sd = 1.716  
Slope = 1.772  
Intercept = 50.76  
Correlation, R = 0.961  
Shapiro-Wilk Test  
Exact Test Value = 0.942  
Critical Val(0.05) = 0.818  
Data Appear Normal  
Approx. Test Value = 0.925  
p-Value = 0.48

**u\_cr**  
n = 10  
Mean = 49.26  
Sd = 2.838  
Slope = 2.795  
Intercept = 49.26  
Correlation, R = 0.926  
Shapiro-Wilk Test  
Exact Test Value = 0.883  
Critical Val(0.05) = 0.842  
Data Appear Normal  
Approx. Test Value = 0.865  
p-Value = 0.083

■ Best Fit Line

### Normal Q-Q Plot for temp



● a\_cr ● u\_cr

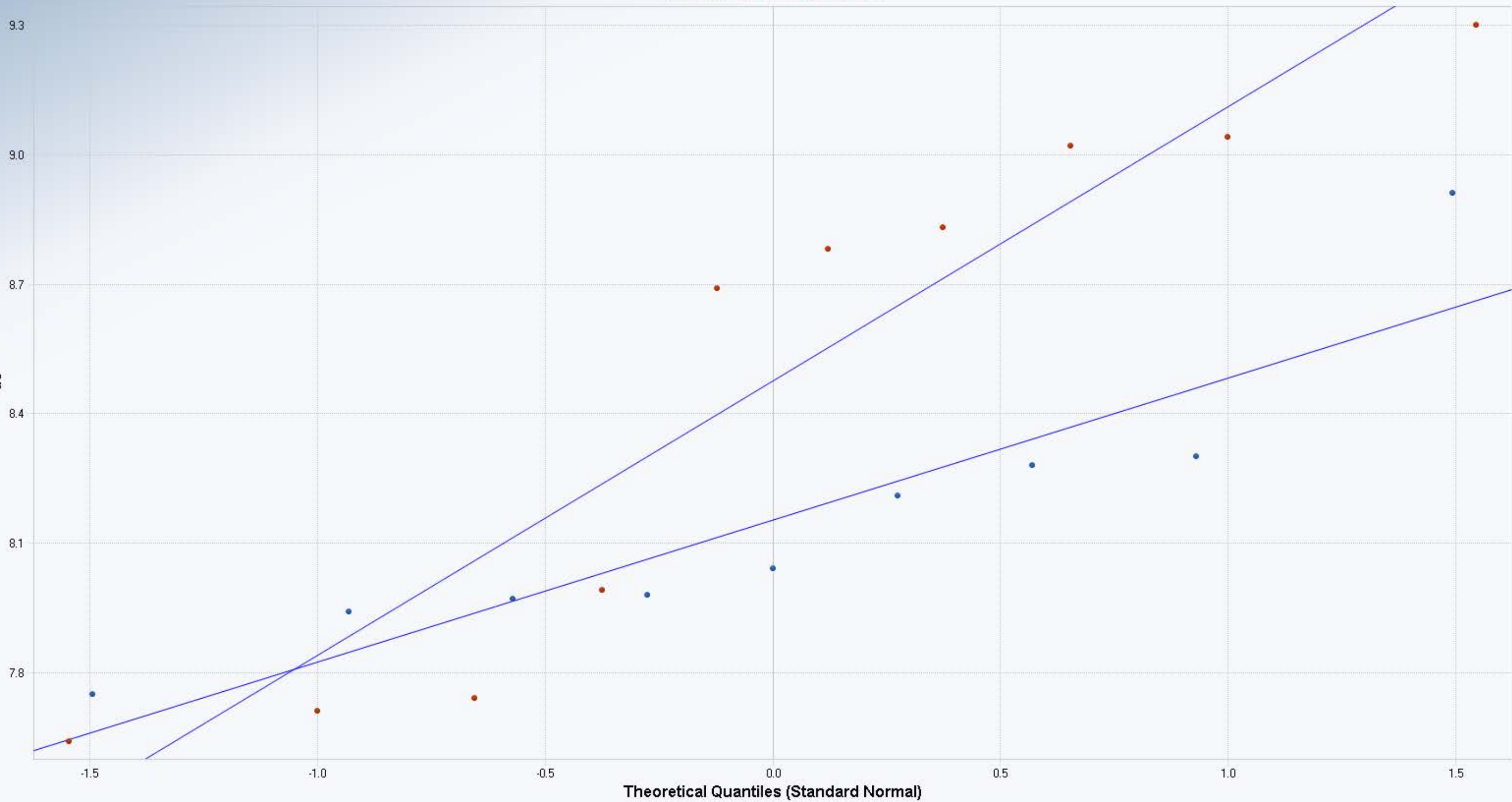
**a\_cr**  
n = 8  
Mean = 15.48  
Sd = 0.191  
Slope = 0.192  
Intercept = 15.48  
Correlation, R = 0.936  
Shapiro-Wilk Test  
Exact Test Value = 0.887  
Critical Val(0.05) = 0.818  
Data Appear Normal  
Approx. Test Value = 0.878  
p-Value = 0.182

**u\_cr**  
n = 10  
Mean = 15.23  
Sd = 0.0949  
Slope = 0.0964  
Intercept = 15.23  
Correlation, R = 0.956  
Shapiro-Wilk Test  
Exact Test Value = 0.911  
Critical Val(0.05) = 0.842  
Data Appear Normal  
Approx. Test Value = 0.913  
p-Value = 0.29

■ Best Fit Line



# Normal Q-Q Plot for do



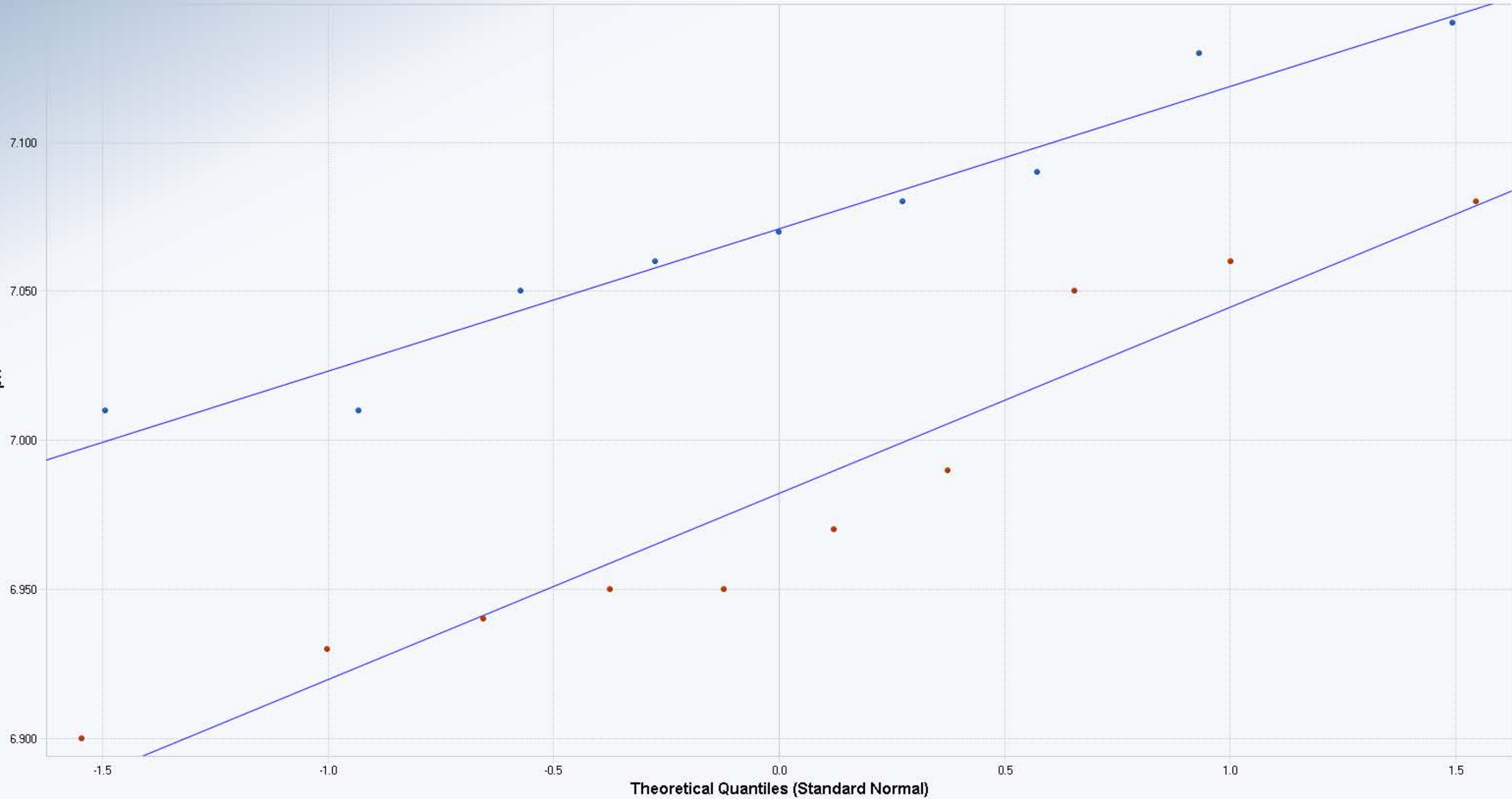
● a\_hsk ● u\_hsk

**a\_hsk**  
n = 9  
Mean = 8.153  
Sd = 0.335  
Slope = 0.33  
Intercept = 8.153  
Correlation, R = 0.921  
Shapiro-Wilk Test  
Exact Test Value = 0.868  
Critical Val(0.05) = 0.829  
Data Appear Normal  
Approx. Test Value = 0.852  
p-Value = 0.0775

**u\_hsk**  
n = 10  
Mean = 8.474  
Sd = 0.634  
Slope = 0.636  
Intercept = 8.474  
Correlation, R = 0.943  
Shapiro-Wilk Test  
Exact Test Value = 0.866  
Critical Val(0.05) = 0.842  
Data Appear Normal  
Approx. Test Value = 0.884  
p-Value = 0.139

■ Best Fit Line

Normal Q-Q Plot for ph



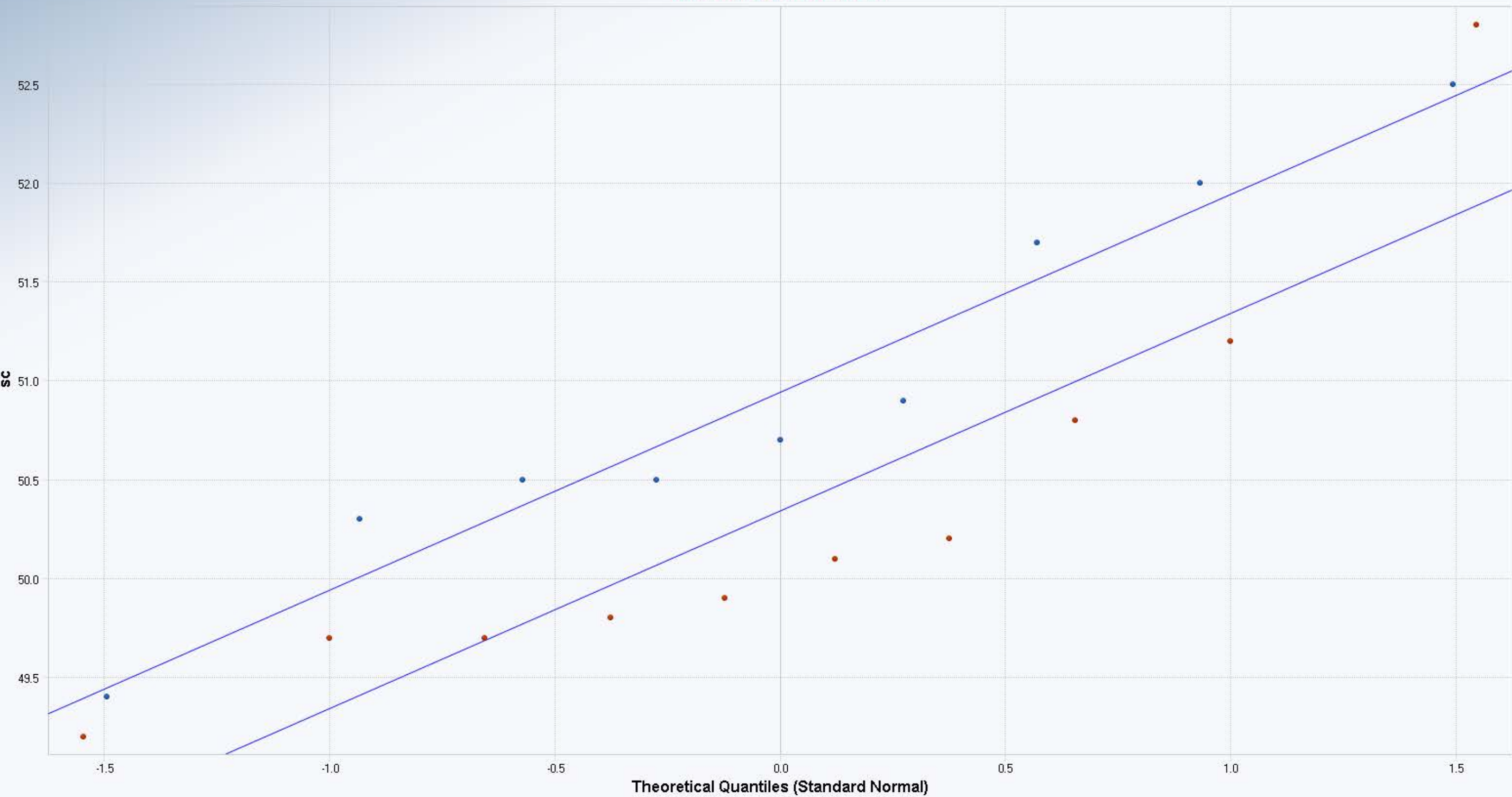
● a\_hsk ● u\_hsk

**a\_hsk**  
n = 9  
Mean = 7.071  
Sd = 0.0457  
Slope = 0.0477  
Intercept = 7.071  
Correlation, R = 0.978  
Shapiro-Wilk Test  
Exact Test Value = 0.940  
Critical Val(0.05) = 0.829  
Data Appear Normal  
Approx. Test Value = 0.954  
p-Value = 0.725

**u\_hsk**  
n = 10  
Mean = 6.982  
Sd = 0.0612  
Slope = 0.0626  
Intercept = 6.982  
Correlation, R = 0.961  
Shapiro-Wilk Test  
Exact Test Value = 0.911  
Critical Val(0.05) = 0.842  
Data Appear Normal  
Approx. Test Value = 0.920  
p-Value = 0.347

■ Best Fit Line

### Normal Q-Q Plot for sc



● a\_hsk ● u\_hsk

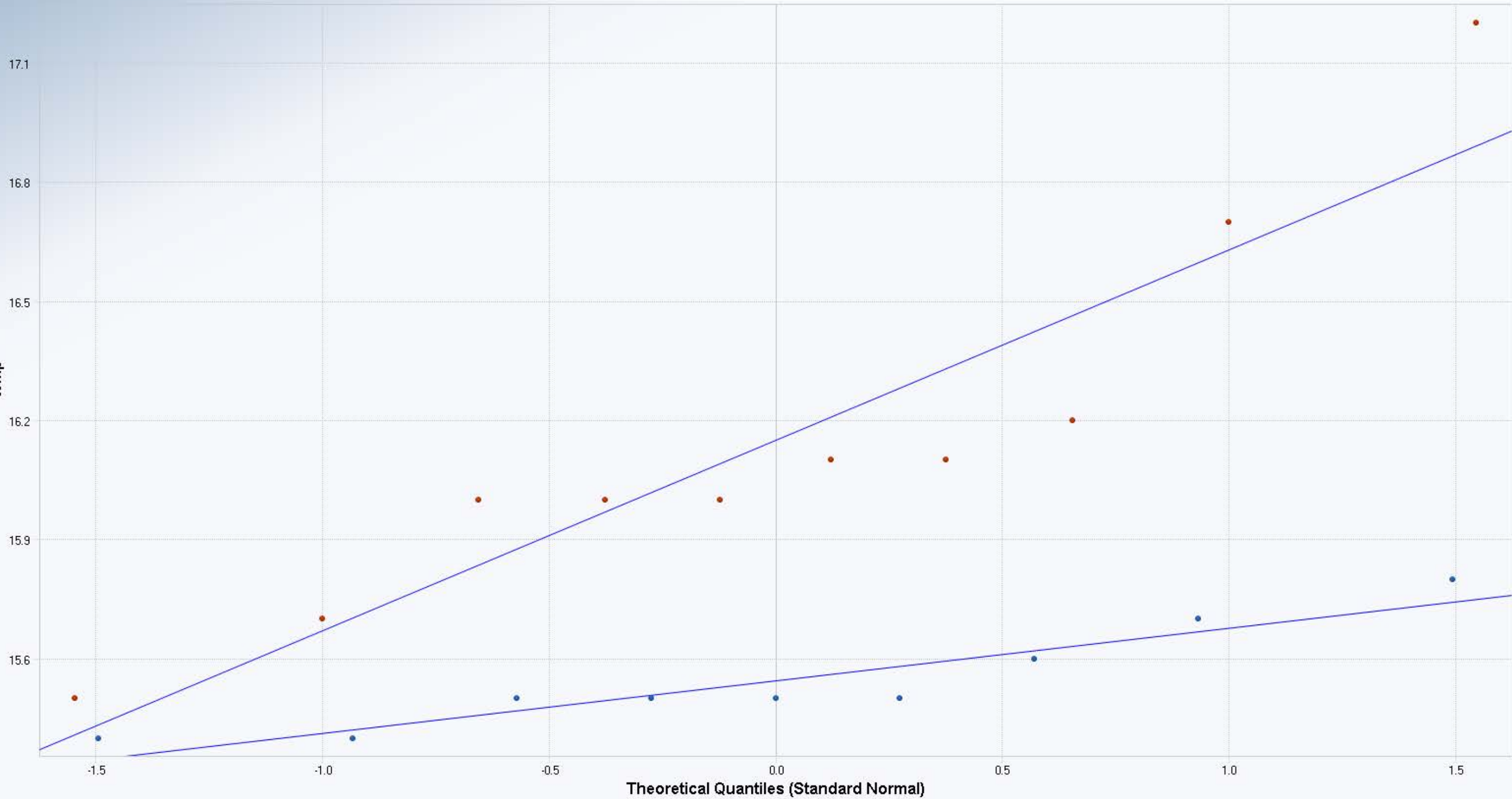
**a\_hsk**  
n = 9  
Mean = 50.94  
Sd = 0.959  
Slope = 1.001  
Intercept = 50.94  
Correlation, R = 0.976  
Shapiro-Wilk Test  
Exact Test Value = 0.955  
Critical Val(0.05) = 0.829  
Data Appear Normal  
Approx. Test Value = 0.954  
p-Value = 0.729

**u\_hsk**  
n = 10  
Mean = 50.34  
Sd = 1.037  
Slope = 1.001  
Intercept = 50.34  
Correlation, R = 0.907  
Shapiro-Wilk Test  
Exact Test Value = 0.840  
Critical Val(0.05) = 0.842  
Data Not Normal  
Approx. Test Value = 0.828  
p-Value = 0.0313

■ Best Fit Line



### Normal Q-Q Plot for temp

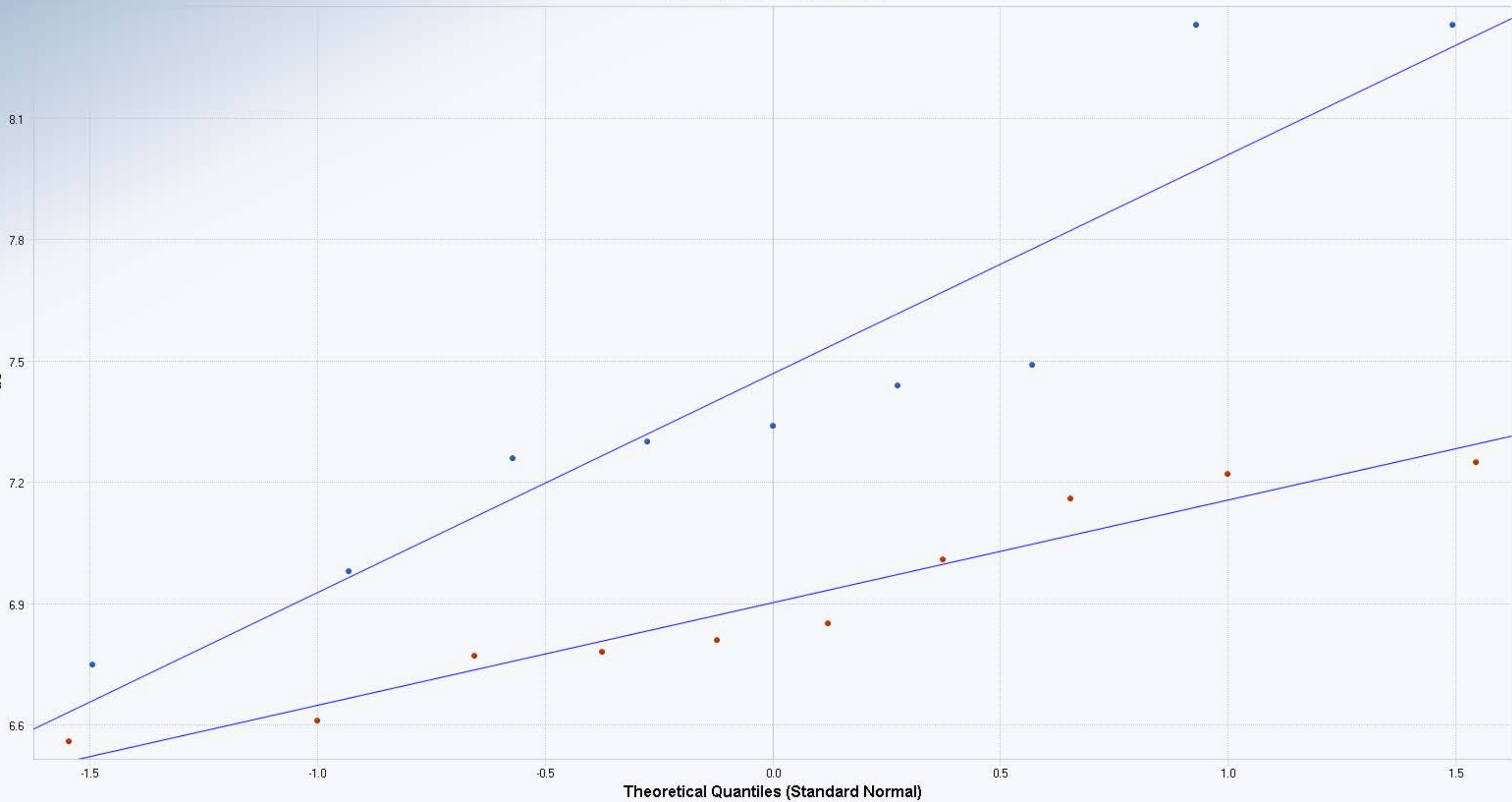


● a\_hsk ● u\_hsk

**a\_hsk**  
n = 9  
Mean = 15.54  
Sd = 0.133  
Slope = 0.133  
Intercept = 15.54  
Correlation, R = 0.936  
Shapiro-Wilk Test  
Exact Test Value = 0.874  
Critical Val(0.05) = 0.829  
Data Appear Normal  
Approx. Test Value = 0.876  
p-Value = 0.141

**u\_hsk**  
n = 10  
Mean = 16.15  
Sd = 0.484  
Slope = 0.479  
Intercept = 16.15  
Correlation, R = 0.931  
Shapiro-Wilk Test  
Exact Test Value = 0.884  
Critical Val(0.05) = 0.842  
Data Appear Normal  
Approx. Test Value = 0.872  
p-Value = 0.1  
■ Best Fit Line

### Normal Q-Q Plot for do



● a\_maoc3 ● u\_maoc3

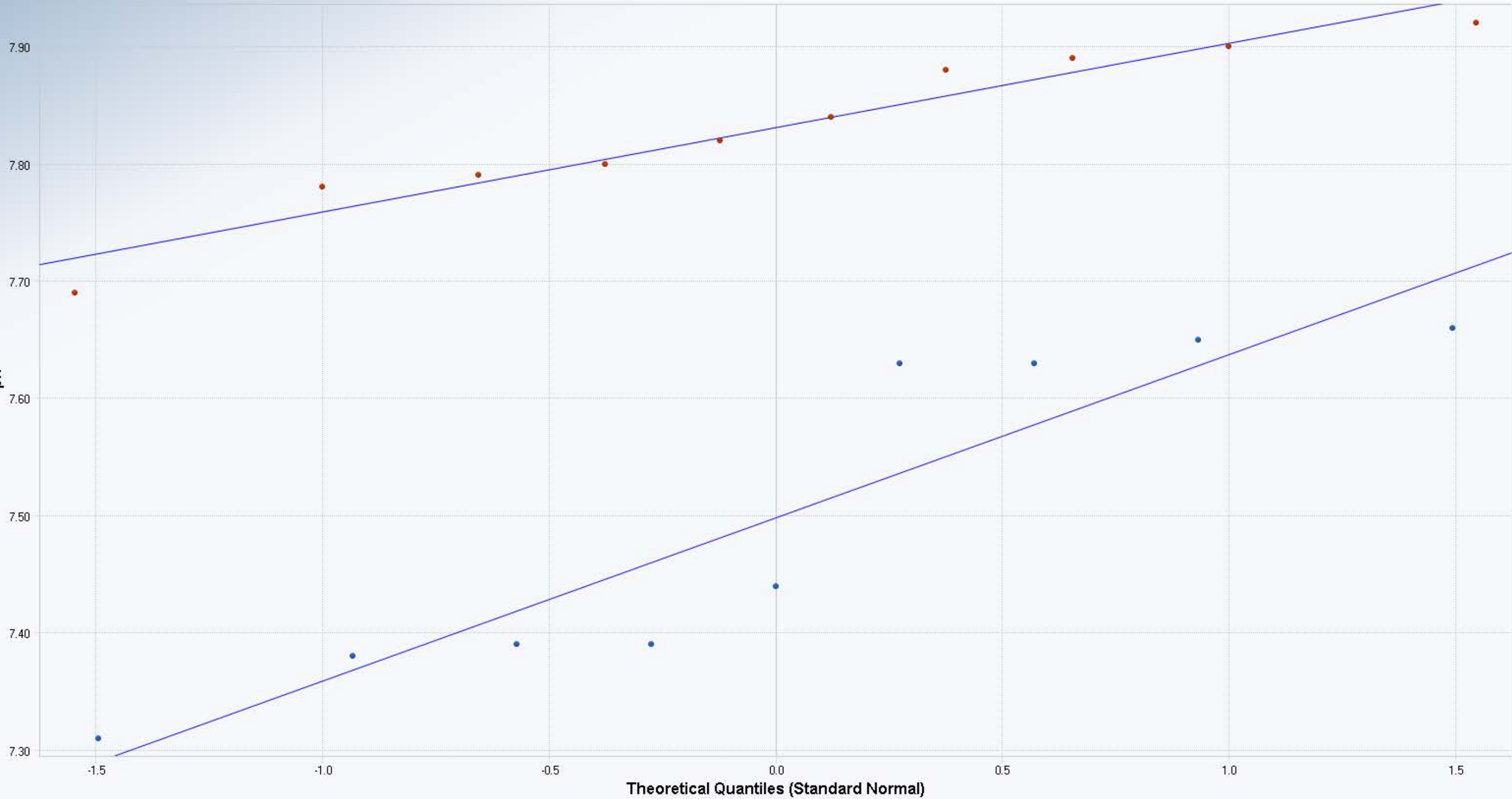
**a\_maoc3**  
n = 9  
Mean = 7.469  
Sd = 0.54  
Slope = 0.541  
Intercept = 7.469  
Correlation, R = 0.938  
Shapiro-Wilk Test  
Exact Test Value = 0.874  
Critical Val(0.05) = 0.829  
Data Appear Normal  
Approx. Test Value = 0.879  
p-Value = 0.151

**u\_maoc3**  
n = 10  
Mean = 6.902  
Sd = 0.246  
Slope = 0.254  
Intercept = 6.902  
Correlation, R = 0.971  
Shapiro-Wilk Test  
Exact Test Value = 0.923  
Critical Val(0.05) = 0.842  
Data Appear Normal  
Approx. Test Value = 0.938  
p-Value = 0.516

■ Best Fit Line



# Normal Q-Q Plot for ph



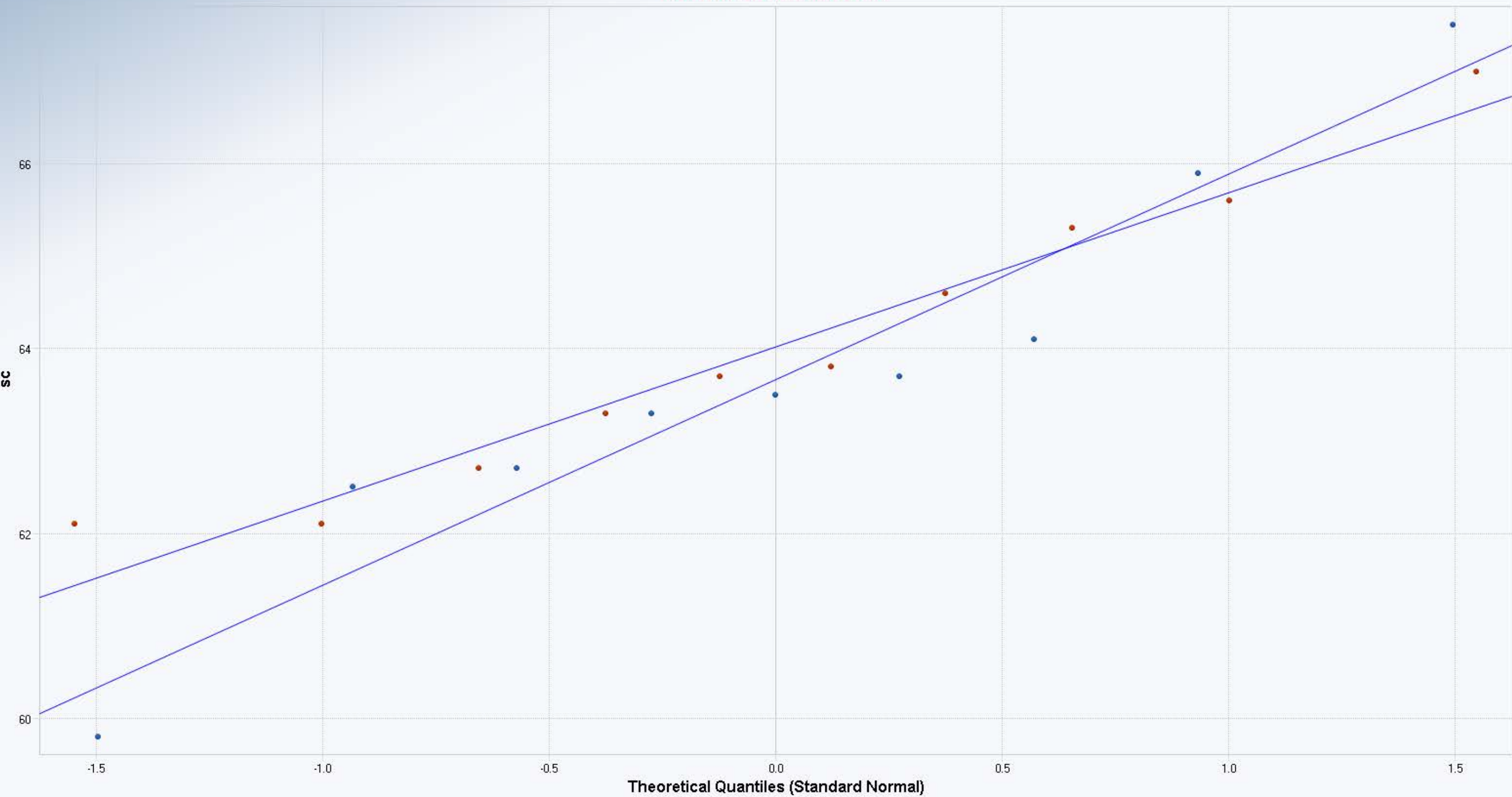
● a\_maoc3 ● u\_maoc3

**a\_maoc3**  
n = 9  
Mean = 7.498  
Sd = 0.141  
Slope = 0.14  
Intercept = 7.498  
Correlation, R = 0.923  
Shapiro-Wilk Test  
Exact Test Value = 0.826  
Critical Val(0.05) = 0.829  
Data Not Normal  
Approx. Test Value = 0.847  
p-Value = 0.0692

**u\_maoc3**  
n = 10  
Mean = 7.831  
Sd = 0.0698  
Slope = 0.0721  
Intercept = 7.831  
Correlation, R = 0.971  
Shapiro-Wilk Test  
Exact Test Value = 0.943  
Critical Val(0.05) = 0.842  
Data Appear Normal  
Approx. Test Value = 0.944  
p-Value = 0.579

■ Best Fit Line

### Normal Q-Q Plot for sc



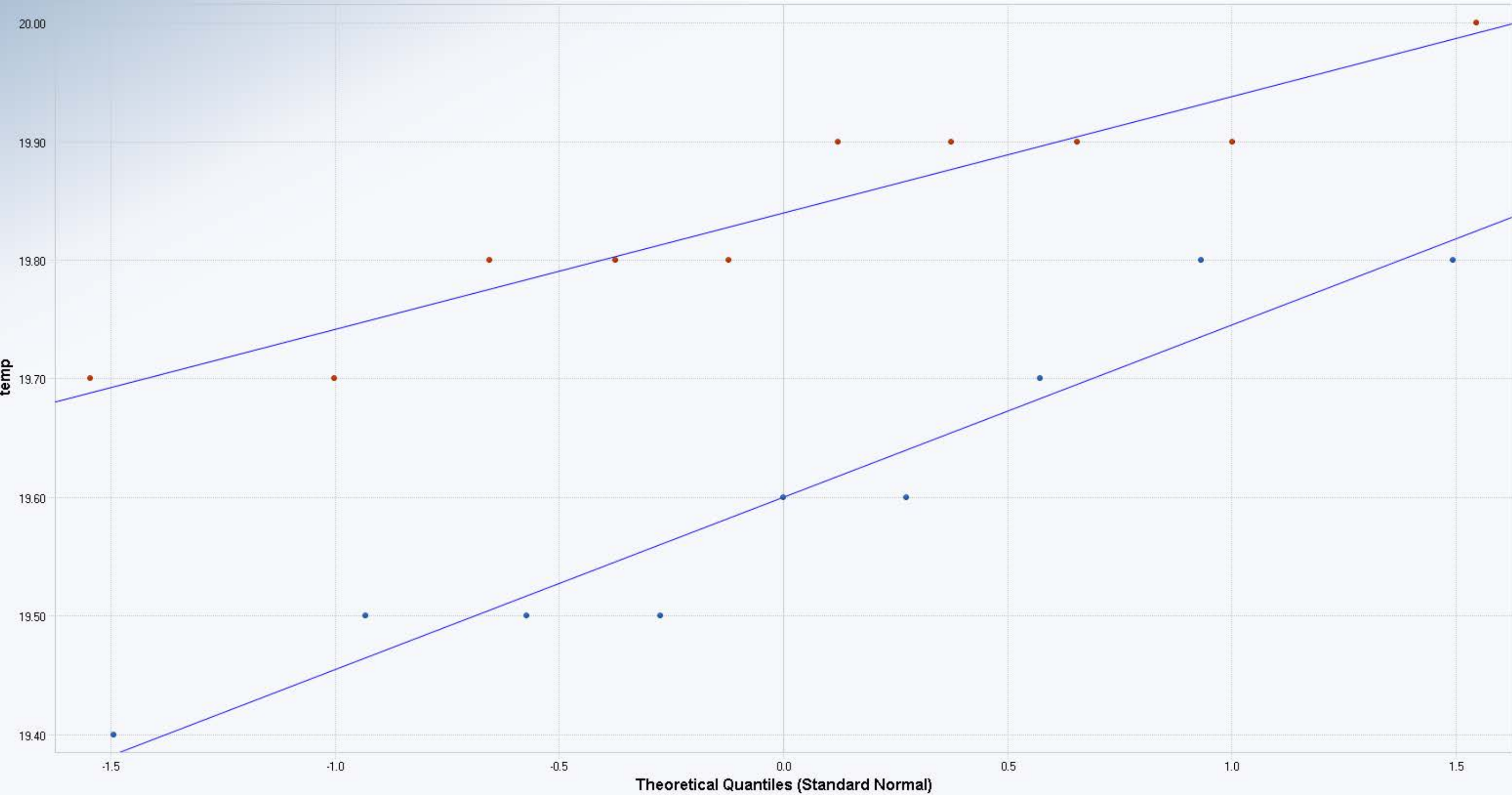
● a\_maoc3 ● u\_maoc3

**a\_maoc3**  
n = 9  
Mean = 63.67  
Sd = 2.159  
Slope = 2.224  
Intercept = 63.67  
Correlation, R = 0.964  
Shapiro-Wilk Test  
Exact Test Value = 0.950  
Critical Val(0.05) = 0.829  
Data Appear Normal  
Approx. Test Value = 0.934  
p-Value = 0.516

**u\_maoc3**  
n = 10  
Mean = 64.02  
Sd = 1.603  
Slope = 1.67  
Intercept = 64.02  
Correlation, R = 0.979  
Shapiro-Wilk Test  
Exact Test Value = 0.948  
Critical Val(0.05) = 0.842  
Data Appear Normal  
Approx. Test Value = 0.956  
p-Value = 0.731

■ Best Fit Line

Normal Q-Q Plot for temp



● a\_maoc3 ● u\_maoc3

**a\_maoc3**  
n = 9  
Mean = 19.6  
Sd = 0.141  
Slope = 0.145  
Intercept = 19.6  
Correlation, R = 0.962  
Shapiro-Wilk Test  
Exact Test Value = 0.911  
Critical Val(0.05) = 0.829  
Data Appear Normal  
Approx. Test Value = 0.924  
p-Value = 0.42

**u\_maoc3**  
n = 10  
Mean = 19.84  
Sd = 0.0966  
Slope = 0.098  
Intercept = 19.84  
Correlation, R = 0.953  
Shapiro-Wilk Test  
Exact Test Value = 0.904  
Critical Val(0.05) = 0.842  
Data Appear Normal  
Approx. Test Value = 0.908  
p-Value = 0.258

■ Best Fit Line