

Certification/Statement of Professional Opinion

Whitewater Valley Station Surface Impoundment Groundwater Monitoring System

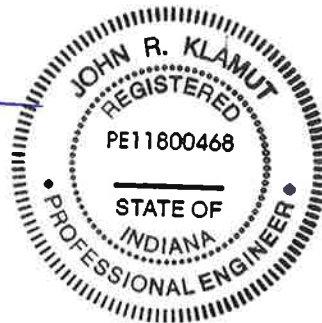
The Groundwater Monitoring System Documentation Report (Report), dated April 2019, for the Whitewater Valley Station Surface Impoundment was prepared by GAI Consultants, Inc. (GAI). The Report may contain findings and determinations that are based on certain information that GAI has relied on, but not independently verified. This Certification/Statement of Professional Opinion is therefore limited to the information available to GAI at the time the Report was written. On the basis of and subject to the foregoing, it is my professional opinion as a Professional Engineer licensed in the State of Indiana that the Report has been prepared in accordance with good and accepted engineering and scientific practices as exercised by other engineers and/or hydrogeologists practicing in the same discipline(s), under similar circumstances, at the same time, and in the same locale. It is my professional opinion that the groundwater monitoring system associated with the Whitewater Valley Station Surface Impoundment has been designed and constructed to meet the requirements of §257.91 of the United States Environmental Protection Agency's "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments," published in the Federal Register on April 17, 2015 with an effective date of October 19, 2015 (40 CFR 257 Subpart D), and meeting the provisions of the "Extension of Compliance Deadlines for Certain Inactive Surface Impoundments: Response to Partial Vacatur," effective October 4, 2016.

The use of the words "certification" and/or "certify" in this document shall be interpreted and construed as a Statement of Professional Opinion and is not and shall not be interpreted or construed as a guarantee, warranty, or legal opinion.

GAI Consultants, Inc.



John R. Klamut, P.E.
Senior Project Manager



Date 4/17/2019