

March 5, 2020

SEMIANNUAL REMEDY SELECTION PROGRESS REPORT BALDWIN FLY ASH POND SYSTEM

In accordance with Title 40 Code of Federal Regulations (C.F.R.) § 257.97(a), the owner or operator of a coal combustion residuals (CCR) unit must prepare a semiannual report describing the progress in selecting and designing a remedy for statistically significant levels (SSLs) of constituents listed in Appendix IV of 40 C.F.R. Part 257 over the groundwater protection standards established in accordance with 40 C.F.R. § 257.95(h).

This report is for the Fly Ash Pond System at the Baldwin Energy Complex.

As stated in the notification dated February 6, 2019, an SSL for total lithium was identified at the Fly Ash Pond System during assessment monitoring completed in accordance with 40 C.F.R. § 257.95.

A Corrective Measures Assessment (CMA) was completed for the Fly Ash Pond System on September 5, 2019 as required by 40 C.F.R. § 257.96. The CMA indicated the source control measure consists of closure in place with a final cover system of earthen material. Closure is underway in accordance with the Closure and Post Closure Care Plan approved by the Illinois Environmental Protection Agency in August of 2016, and scheduled to be completed by November 2020. Post-closure groundwater monitoring will also be completed to assess natural attenuation of CCR constituents in groundwater and demonstrate that the extent of groundwater impact is decreasing in size and concentration following closure.

A public meeting was held on December 2, 2019 at the Red Bud High School Gymnasium in Red Bud, Illinois to discuss the results of the of the CMA in accordance with 40 C.F.R. § 257.96(e).

Selection of the groundwater remedy is currently in the monitored natural attenuation (MNA) feasibility study phase.