

2018 Annual Groundwater Monitoring and Corrective Action Report

Baldwin Fly Ash Pond System – CCR Unit ID 605
Baldwin Energy Complex
10901 Baldwin Road
Baldwin, Illinois 62217

Dynegy Midwest Generation, LLC

January 31, 2019



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Baldwin Fly Ash Pond System – CCR Unit ID 605
Baldwin Energy Complex
Baldwin, Illinois

Prepared for:
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ACRONYMS AND ABBREVIATIONS

CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
GWPS	Groundwater Protection Standard
mg/L	milligrams per liter
NRT/OBG	Natural Resource Technology, an OBG Company
OBG	O'Brien & Gere Engineers, part of Ramboll
pCi/L	picoCuries per liter
SSI	Statistically Significant Increase
SSL	Statistically Significant Level
S.U.	Standard Units
TDS	Total Dissolved Solids

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SECTION 1: INTRODUCTION

This report has been prepared on behalf of Dynegey Midwest Generation, LLC by O'Brien & Gere Engineers, part of Ramboll (OBG), to provide the information required by the Code of Federal Regulations (CFR) found in 40 CFR 257.90(e) for the Baldwin Fly Ash Pond System located at Baldwin Energy Complex near Baldwin, Illinois.

In accordance with 40 CFR § 257.90(e), the owner or operator of an existing Coal Combustion Residuals (CCR) unit must prepare an annual groundwater monitoring and corrective action report, for the preceding calendar year, that documents the status of the groundwater monitoring and corrective action program for the CCR unit, summarizes key actions completed, describes any problems encountered, discusses actions to resolve the problems, and projects key activities for the upcoming year. At a minimum, the annual report must contain the following information, to the extent available:

1. A map, aerial image, or diagram showing the CCR unit and all background (or upgradient) and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program for the CCR unit.
2. Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken.
3. In addition to all the monitoring data obtained under §§ 257.90 through 257.98, a summary including the number of groundwater samples that were collected for analysis for each background and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs.
4. A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels).
5. Other information required to be included in the annual report as specified in §§ 257.90 through 257.98¹.

This report provides the required information for the Baldwin Fly Ash Pond System for calendar year 2018.

¹ For calendar year 2018, corrective action and other information required to be included in the annual report as specified in §§ 257.96 through 257.98 is not applicable.

SECTION 2: MONITORING AND CORRECTIVE ACTION PROGRAM STATUS

Detection Monitoring Program sampling event dates and parameters collected are provided in the detection monitoring program summary table below. One sample was collected from each background and downgradient well in the monitoring system during each sampling event. Analytical data was evaluated after each event in accordance with the Statistical Analysis Plan, Baldwin Energy Complex, Dynegy Midwest Generation, LLC (NRT/OBG, 2017a) to identify any statistically significant increases (SSIs) of Appendix III parameters over background concentrations. The sampling event and whether SSIs were identified are provided in the detection monitoring program summary table below.

Detection Monitoring Program Summary

Sampling Dates	Parameters Collected	SSIs	Assessment Monitoring Program Established
November 27 and 28, 2017	Appendix III	Yes	April 9, 2018

Alternate source evaluations were inconclusive for one or more of the SSIs. Consequently, and in accordance with 40 CFR § 257.94(e)(2), an Assessment Monitoring Program was established for Baldwin Fly Ash Pond System on April 9, 2018 and the required notifications completed.

The first Assessment Monitoring sampling event was completed on June 26, 2018 and June 27, 2018. One sample was collected from each background and downgradient well in the monitoring system and analyzed for Appendix III and Appendix IV parameters. In accordance with 40 CFR § 257.95(d)(1), all wells were resampled on September 25, 2018 and September 26, 2018 for all Appendix III parameters and Appendix IV parameters detected during the first Assessment Monitoring sampling event. One sample was collected from each background and downgradient well in the monitoring system. Analytical data from the resampling event was evaluated in accordance with the statistical analysis plan (NRT/OBG, 2017a) to determine any SSIs of Appendix III parameters over background concentrations or statistically significant levels (SSLs) of Appendix IV parameters over Groundwater Protection Standards (GWPSs). The assessment monitoring program summary table below provides a summary of the Assessment Monitoring Program and results of SSL determinations.

Assessment Monitoring Program Summary

Sampling Dates	Parameters Collected	SSLs
June 26 and 27, 2018	Appendix III Appendix IV	Not Applicable
September 25 and 26, 2018	Appendix III Appendix IV Detected	To Be Determined

Statistical background values are provided in Table 1 and GWPSs in Table 2. Analytical results from the events summarized in the detection and assessment monitoring summary tables above are included in Tables 3 and 4.

The Baldwin Fly Ash Pond System remains in the Assessment Monitoring Program in accordance with 40 CFR § 257.95.

SECTION 3: KEY ACTIONS COMPLETED IN 2018

Two groundwater monitoring events were completed in 2018 under the Assessment Monitoring Program. These events occurred in June and September, and are detailed in Section 2. One groundwater sample was collected from each background and downgradient well in the monitoring system during each event. All samples were collected and analyzed in accordance with the Sampling and Analysis Plan (NRT/OBG, 2017b). All monitoring data obtained under 40 CFR §§ 257.90 through 257.98 (as applicable) in 2018 are presented in Tables 3 and 4. The groundwater monitoring system, including the CCR unit and all background and downgradient monitoring wells, is presented in Figure 1.

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SECTION 4: PROBLEMS ENCOUNTERED AND ACTIONS TO RESOLVE THE PROBLEMS

No problems were encountered with the groundwater monitoring program during 2018. Groundwater samples were collected and analyzed in accordance with the Sampling and Analysis Plan (NRT/OBG, 2017b), and all data was accepted.

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SECTION 5: KEY ACTIVITIES PLANNED FOR 2019

The following key activities are planned for 2019:

- Continuation of the Assessment Monitoring Program with semi-annual sampling scheduled for the first and third quarters of 2019.
- Complete evaluation of analytical data from the downgradient wells, using GWPSs to determine whether an SSL of Appendix IV parameters has occurred.
- If an SSL is identified, potential alternate sources (i.e., a source other than the CCR unit caused the SSL or that SSL resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality) will be evaluated. If an alternate source is demonstrated to be the cause of the SSL, a written demonstration will be completed within 90 days of SSL determination and included in the annual groundwater monitoring and corrective action report for 2019.
 - » If an alternate source(s) is not identified to be the cause of the SSL, the applicable requirements of 40 CFR §§ 257.94 through 257.98 (e.g., assessment of corrective measures) as may apply in 2019 will be met, including associated recordkeeping/notifications required by 40 CFR §§ 257.105 through 257.108.

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REFERENCES

Natural Resource Technology, an OBG Company, 2017a, Statistical Analysis Plan, Baldwin Energy Complex, Havana Power Station, Hennepin Power Station, Wood River Power Station, Dynegy Midwest Generation, LLC, October 17, 2017.

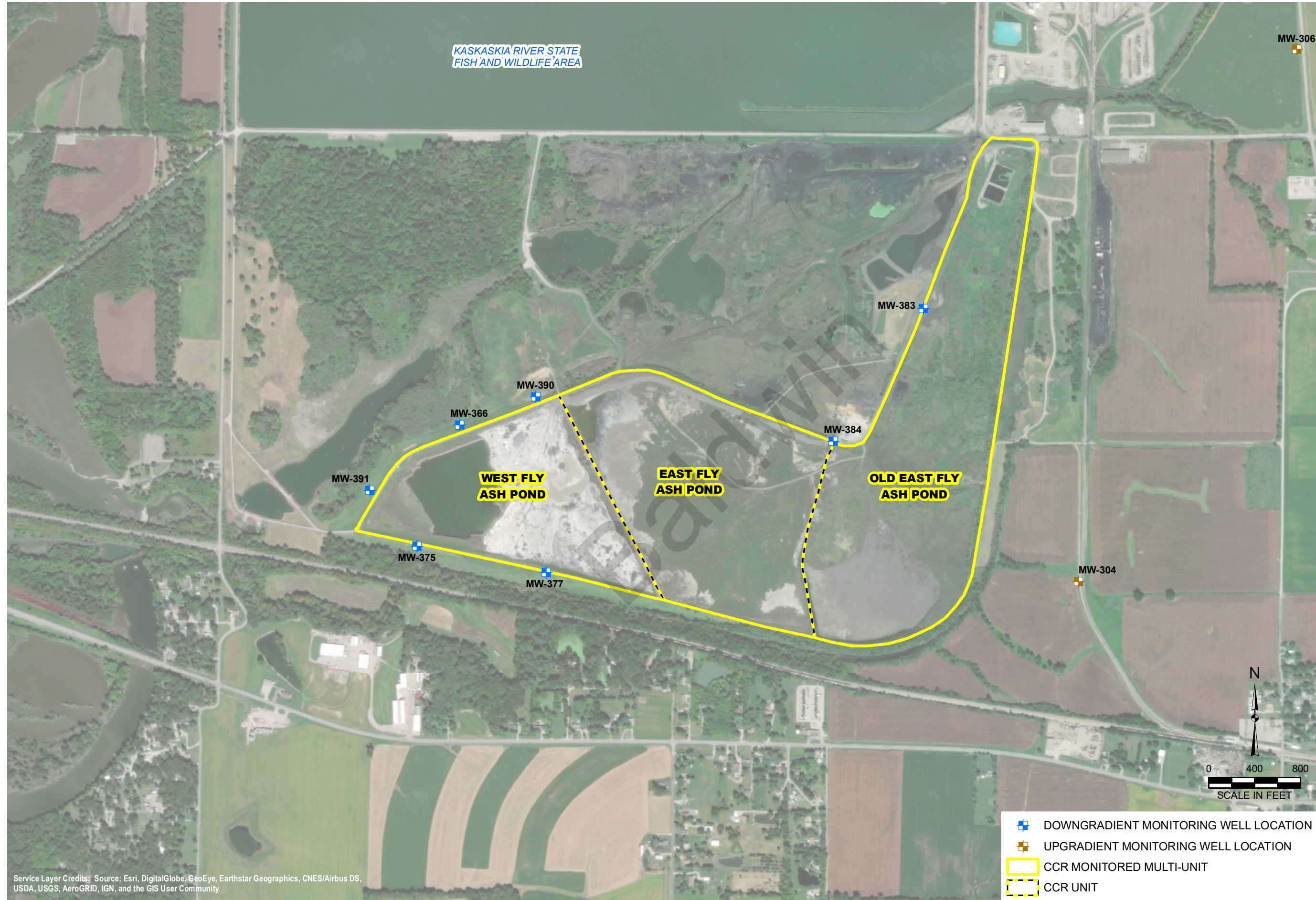
Natural Resource Technology, an OBG Company, 2017b, Sampling and Analysis Plan, Baldwin Fly Ash Pond System, Baldwin Energy Complex, Baldwin, Illinois, Project No. 2285, Revision 0, October 17, 2017.

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Figures

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SDS 12/17/18
REVIEWED BY/DATE:
RAB 12/17/18
APPROVED BY/DATE:
JWW 12/21/18

GROUNDWATER SAMPLING WELL LOCATION MAP
BALDWIN FLY ASH POND SYSTEM
MULTI-UNIT ID: 605

2018 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT
VISTRA CCR RULE GROUNDWATER MONITORING
BALDWIN ENERGY COMPLEX
BALDWIN, ILLINOIS

PROJECT NO: 70093

FIGURE NO: 1



Tables

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Table 1. Statistical Background Values

2018 Annual Groundwater Monitoring and Corrective Action Report

Baldwin Energy Complex

Unit ID 605 - Baldwin Fly Ash Pond System

Parameter	Statistical Background Value
Appendix III	
Boron (mg/L)	2.207
Calcium (mg/L)	34.923
Chloride (mg/L)	155
Fluoride (mg/L)	1.98
pH (S.U.)	7.8 / 11.2
Sulfate (mg/L)	200
TDS (mg/L)	1360

[O: KLS 8/22/18, C: RAB 8/30/18]

Notes:

mg/L = milligrams per liter

S.U. = Standard Units

TDS = Total Dissolved Solids

Table 2. Groundwater Protection Standards

2018 Annual Groundwater Monitoring and Corrective Action Report
Baldwin Energy Complex
Unit ID 605 - Baldwin Fly Ash Pond System

Parameter	Groundwater Protection Standard
Appendix IV	
Antimony (mg/L)	0.006
Arsenic (mg/L)	0.0315
Barium (mg/L)	2
Beryllium (mg/L)	0.004
Cadmium (mg/L)	0.005
Chromium (mg/L)	0.10
Cobalt (mg/L)	0.006
Fluoride (mg/L)	4
Lead (mg/L)	0.015
Lithium (mg/L)	0.0693
Mercury (mg/L)	0.002
Molybdenum (mg/L)	0.10
Selenium (mg/L)	0.05
Thallium (mg/L)	0.002
Radium 226+228 (pCi/L)	5

[O: KLS 8/22/18, C: RAB 8/30/18]

Notes:

mg/L = milligrams per liter

pCi/L = picoCuries per liter

Table 3. Appendix III Analytical Results

2018 Annual Groundwater Monitoring and Corrective Action Report

Baldwin Energy Complex

Unit ID 605 - Baldwin Fly Ash Pond System

Sample Location	Date Sampled	B, total (mg/L)	Ca, total (mg/L)	Cl, total (mg/L)	F, total (mg/L)	pH (field) (S.U.)	SO4, total (mg/L)	TDS (mg/L)
Background / Upgradient Monitoring Wells								
MW-304	11/28/2017	1.45	11.4	138	1.72	8.0	178	1330
	6/27/2018	1.75	12.9	151	1.67	7.4	208	1360
	9/26/2018	1.74	13.1	151	1.64	7.9	201	1420
MW-306	11/28/2017	0.407	3.40	55	0.65	10.7	39	328
	6/27/2018	0.139	45.9	64	0.64	10.5	42	376
	9/26/2018	0.159	36.9	61	0.54	11.1	34	325
Downgradient Monitoring Wells								
MW-366	11/27/2017	1.79	108	31	0.96	7.3	195	740
	6/26/2018	1.53	141	50	0.45	6.9	526	1060
	9/25/2018	1.38	127	47	0.63	7.0	432	1050
MW-375	11/27/2017	1.26	10.6	90	2.38	7.9	88	928
	6/27/2018	1.46	24.0	103	2.21	7.6	243	1110
	9/25/2018	1.34	19.7	107	2.14	7.8	214	1100
MW-377	11/28/2017	1.91	63.2	90	1.12	7.0	41 S	652
	6/27/2018	1.74	54.1	93	1.20	7.0	46	614
	9/25/2018	1.78	55.9	96	1.10	7.2	41	646
MW-383	11/28/2017	1.49	18.4	39	0.75	7.6	171	962
	6/27/2018	1.50	17.0	39	0.75	7.3	200	926
	9/25/2018	1.40	16.8	40	0.70	7.6	184	940
MW-384	11/28/2017	1.92	20.7	234	1.80	7.9	114	1230
	6/27/2018	1.51	21.4	248	1.64	7.2	124	1200
	9/25/2018	1.39	19.8	396	3.06	8.0	82	1510
MW-390	11/27/2017	0.854	69.7	112	0.90	7.5	228	898
	6/26/2018	0.207	68.4	64	0.48	6.9	141	636
	9/25/2018	0.175	90.4	69	0.49	7.0	117	660
MW-391	6/26/2018	8.91	78.9	168	1.83	7.3	1760	3030
	9/25/2018	8.60	64.6	181	1.9	7.5	1420	3090

[O: RAB 12/27/18, C: JQW 12/27/18]

Notes:

mg/L = milligrams per liter

S.U. = Standard Units

TDS = Total Dissolved Solids

Table 4. Appendix IV Analytical Results

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Baldwin Energy Complex

Unit ID 605 - Baldwin Fly Ash Pond System

Sample Location	Date Sampled	Sb, total (mg/L)	As, total (mg/L)	Ba, total (mg/L)	Be, total (mg/L)	Cd, total (mg/L)	Cr, total (mg/L)	Co, total (mg/L)	F, total (mg/L)	Pb, total (mg/L)	Li, total (mg/L)	Hg, total (mg/L)	Mo, total (mg/L)	Ra226/228 Combined (pCi/L)	Se, total (mg/L)	Tl, total (mg/L)
Background / Upgradient Monitoring Wells																
MW-304	6/27/2018	<0.001	0.0021	0.0210	<0.001	<0.001	<0.0015	<0.001	1.67	<0.001	0.0874	<0.0002	0.0022	1.23	<0.001	<0.002
	9/26/2018 ^a	<0.001	0.0025	0.0229	NA	NA	<0.0015	NA	1.64	NA	0.0958	NA	0.0019	0.26	<0.001	NA
MW-306	6/27/2018	<0.001	0.0024	0.0205	<0.001	<0.001	<0.0015	<0.001	0.64	<0.001	0.0136	<0.0002	0.0281	0.55	<0.001	<0.002
	9/26/2018 ^a	<0.001	0.0019	0.0155	NA	NA	<0.0015	NA	0.54	NA	0.0132	NA	0.0252	0.49	<0.001	NA
Downgradient Monitoring Wells																
MW-366	6/26/2018	<0.001	<0.001	0.0441	<0.001	<0.001	<0.0015	<0.001	0.45	<0.001	0.0115	<0.0002	0.0078	0.53	<0.001	<0.002
	9/25/2018 ^a	<0.001	<0.001	0.0623	NA	NA	<0.0015	NA	0.63	NA	0.0171	NA	0.0056	3.11	<0.001	NA
MW-375	6/27/2018	0.0019	0.0014	0.0297	<0.001	<0.001	<0.0015	<0.001	2.21	<0.001	0.0769	<0.0002	0.0294	0.35	<0.001	<0.002
	9/25/2018 ^a	0.0016	0.0014	0.0263	NA	NA	<0.0015	NA	2.14	NA	0.0707	NA	0.0266	0.23	<0.001	NA
MW-377	6/27/2018	<0.001	<0.001	0.0643	<0.001	<0.001	0.0053	<0.001	1.20	<0.001	0.0603	<0.0002	<0.0015	1.06	<0.001	<0.002
	9/25/2018 ^a	<0.001	<0.001	0.0608	NA	NA	<0.0015	NA	1.10	NA	0.0584	NA	<0.0015	1.15	<0.001	NA
MW-383	6/27/2018	<0.001	<0.001	0.0398	<0.001	<0.001	0.0034	<0.001	0.75	<0.001	0.0378	<0.0002	0.0097	0.55	<0.001	<0.002
	9/25/2018 ^a	<0.001	<0.001	0.0363	NA	NA	<0.0015	NA	0.70	NA	0.0354	NA	0.0090	0.81	<0.001	NA
MW-384	6/27/2018	<0.001	<0.001	0.0332	<0.001	<0.001	<0.0015	<0.001	1.64	<0.001	0.0522	<0.0002	0.0350	0.53	<0.001	<0.002
	9/25/2018 ^a	<0.001	<0.001	0.0285	NA	NA	<0.0015	NA	3.06	NA	0.0392	NA	0.0222	0.99	<0.001	NA
MW-390	6/26/2018	<0.001	0.002	0.0806	<0.001	<0.001	<0.0015	<0.001	0.48	<0.001	0.0136	<0.0002	0.0044	0.69	<0.001	<0.002
	9/25/2018 ^a	<0.001	0.0016	0.101	NA	NA	<0.0015	NA	0.49	NA	0.0146	NA	0.0041	0.85	<0.001	NA
MW-391	6/26/2018	0.0013	0.0012	0.0475	<0.001	<0.001	<0.0015	<0.001	1.83	<0.001	0.114	<0.0002	0.0323	0.95	0.0049	<0.002
	9/25/2018 ^a	0.0016	0.0011	0.0450	NA	NA	<0.0015	NA	1.90	NA	0.135	NA	0.0383	1.32	0.0045	NA

[O: RAB 12/27/18, C: JQW 12/27/18, U: AJB 1/28/19]

Notes:

mg/L = milligrams per liter

pCi/L = picoCuries per liter

NA = Not Analyzed

< = concentration is less than the reporting limit

^aOnly the parameters detected during the previous sampling event were analyzed during this sampling event, in accordance with 40CFR § 257.95(d)(1).

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