

September 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 activities occurring between March 5, 2020 and September 5, 2020 at the Fly Ash Pond System at the Baldwin Energy Complex.

As stated in the March 5, 2020 Semiannual Remedy Selection Progress Report, 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 construction is nearing completion 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 in September 2020.

As stated in the notification dated August 13, 2020, 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.

Selection of the groundwater remedy continues to be in the monitored natural attenuation (MNA) feasibility study phase. Activities completed since March 5, 2020 include review of existing groundwater and source water data, identification and collection of additional groundwater and source water samples, and identification of additional data collection needs to support development of a geochemical conceptual site model. These activities are necessary to understand the natural attenuation mechanisms occurring at the site and to evaluate the natural attenuation of lithium to meet applicable groundwater protection standards.