

September 5, 2022

SEMIANNUAL REMEDY SELECTION PROGRESS REPORT FLY ASH POND SYSTEM BALDWIN POWER PLANT

In accordance with Title 40 Code of Federal Regulations (40 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. § 257 over the groundwater protection standards established in accordance with 40 C.F.R. § 257.95(h).

The Fly Ash Pond System (FAPS) is located in the State of Illinois and is also subject to the state's CCR program located at Title 35 of the Illinois Administrative Code (35 I.A.C.) Part 845. An application for an operating permit for the FAPS required by 35 I.A.C § 845.230 was submitted to the Illinois Environmental Protection Agency (IEPA) by October 31, 2021 and is pending approval. An evaluation of background groundwater quality was completed and presented in the operating permit application. Exceedances of groundwater protection standards established under Part 845 require corrective action through a permitting process administered by IEPA. The operating permit application and related documents can be found on the company's publicly available CCR website: <https://www.luminant.com/ccr/illinois-ccr/>

This report is for activities occurring between March 6, 2022, and September 5, 2022, at the FAPS at the Baldwin Power Plant.

As stated in previous Semiannual Remedy Selection Progress Reports, a Corrective Measures Assessment (CMA) was completed for the Fly Ash Pond System on September 5, 2019, to address an SSL for total lithium (see related notification dated February 6, 2019), as required by 40 C.F.R. § 257.96. The CMA was revised on November 15, 2019, to address typographical errors. Additional revisions were made to the CMA on November 30, 2020, to include additional information related to site geology/hydrogeology and the potential groundwater corrective measures of Monitored Natural Attenuation (MNA), permeable reactive barrier, and in-situ chemical treatment.

The CMA indicated the source control measure consists of closure in place with a final cover system of earthen material in accordance with the Closure and Post Closure Care Plan for the Fly Ash Pond System submitted to the Illinois Environmental Protection Agency (IEPA) in March 2016. IEPA approved the Closure and Post Closure Care Plan on August 16, 2016. Construction of the final cover system was initiated in 2018 and completed in November 2020.

An SSL for total lithium was not identified at the FAPS following assessment monitoring completed during the previous two reporting periods in accordance with 40 C.F.R. § 257.95. Consequently, further evaluation of total lithium for corrective action is not warranted for the Fly Ash Pond System.

Remedy selection will take into consideration compliance with both 40 C.F.R. § 257 and 35 I.A.C. Part 845, the latter of which cannot be completed until IEPA approves the groundwater monitoring program and issues an operating permit. In accordance with 40 C.F.R. § 257.97, remedy selection is to be completed as soon as feasible following completion of the corrective measures assessment. As required by 35 I.A.C. § 845.670, a corrective action plan that identifies the selected remedy must be submitted to IEPA within one year after completing the assessment of corrective measures. It is anticipated that these activities related to 35 I.A.C.



Part 845 compliance will occur in 2023 with submittal of a corrective action plan in 2024 that meets both 40 C.F.R. § 257 and 35 I.A.C. Part 845.