

March 5, 2023

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

In accordance with Title 40 of the 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, Title 35 of the Illinois Administrative Code (35 I.A.C.) § 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 September 6, 2022, and March 5, 2023, at the FAPS at the Baldwin Power Plant.

As stated in the previous Semiannual Remedy Selection Progress Reports, a Corrective Measures Assessment (CMA) was completed for the FAPS to address an SSL for total lithium. An SSL for lithium has not been identified at the FAPS since the determination dated January 17, 2021 associated with the Q3 2020 reporting period. Consequently, further evaluation of total lithium for corrective action is not warranted for the Fly Ash Pond System.

Future 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.