

Cynthia Vodopivec Dynegy Midwest Generation, LLC Luminant 6555 Sierra Dr. Irving, TX 75039

March 7, 2023

Mr. Richard Huggins Energy Recovery and Waste Disposal Branch Office of Resource Conservation and Recovery U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460

Re: Bottom Ash Pond and Fly Ash Pond System, Baldwin Power Plant, Baldwin Illinois – Update to 40 C.F.R. § 257 Compliance Groundwater Monitoring Program to Align with Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845 Compliance Groundwater Monitoring Program

Dear Mr. Huggins:

Dynegy Midwest Generation, LLC (DMG) is providing the U.S. Environmental Protection Agency ("EPA") with this update to the Groundwater Monitoring Plan (GMP) associated with the Bottom Ash Pond and the Fly Ash Pond System at the Baldwin Power Plant (BPP), located near Baldwin, Illinois. These revised GMPs includes content requirements specific to 40 C.F.R. § 257.91 (Groundwater Monitoring Systems), 40 C.F.R. § 257.93 (Groundwater Sampling and Analysis Requirements), 40 C.F.R. § 257.94 (Detection Monitoring Program), and 40 C.F.R. § 257.95 (Assessment Monitoring Program). Certification of the two monitoring systems at the Baldwin Power Plant (BPP) are included in the GMPs. DMG has also prepared a revised Statistical Analysis Plan and corresponding statistical method certifications in accordance with the requirements of 40 C.F.R. § 257.93(f)(6), and two additional documents - Quality Assurance Project Plan (QAPP) and Sampling and Analysis Plan (SAP) – to meet the requirements of both 40 C.F.R. § 257 and 35 I.A.C. § 845 and provide conformity between the two programs.

Accordingly, along with this letter, we are posting the two GMPs under 40 C.F.R. § 257.91 and the Statistical Analysis Plan certifications under 40 C.F.R. § 257.93 to Luminant's public CCR website: www.luminant.com/ccr/. The updated Statistical Analysis Plan along with the QAPP and SAP have been placed in the BPP's operating record. A Hydrogeologic Site Characterization Report developed to meet the requirements of 351.A.C. § 845 has also been placed in the BPP's operating record. This submission should be included by EPA as an update to the administrative record for the alternative closure demonstration that is currently pending for the Baldwin Power Plant.

An electronic PDF of this letter is being submitted to Richard Huggins, Frank Behan and Lydia Anderson via email. If you have any questions regarding this submittal, please contact me or Phil Morris at 618-343-7794 or phil.morris@vistracorp.com.

Sincerely,

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Cynthia Vodopivec SVP – Environmental, Health & Safety