

Intended for  
**Dynegy Midwest Generation, LLC**

Date  
**December 28, 2022**

Project No.  
**1940103307**

**40 C.F.R. § 257 GROUNDWATER  
MONITORING PLAN**  
**FLY ASH POND SYSTEM**  
**BALDWIN POWER PLANT**  
**BALDWIN, ILLINOIS**

## 40 C.F.R. § 257 GROUNDWATER MONITORING PLAN BALDWIN POWER PLANT FLY ASH POND SYSTEM

Project name **Baldwin Power Plant Fly Ash Pond System**  
Project no. **1940103307**  
Recipient **Dynegy Midwest Generation, LLC**  
Document type **40 C.F.R. § 257 Groundwater Monitoring Plan**  
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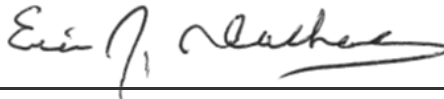
Ramboll  
234 W. Florida Street  
Fifth Floor  
Milwaukee, WI 53204  
USA

T 414-837-3607  
F 414-837-3608  
<https://ramboll.com>



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**Brian G. Hennings, PG**  
Senior Managing Hydrogeologist



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**Eric J. Tlachac, PE**  
Senior Managing Engineer



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**Evvan G. Plank**  
Geologist

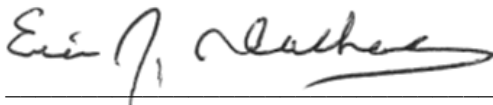
## LICENSED PROFESSIONAL CERTIFICATIONS

### 40 C.F.R. § 257.91(f) Groundwater Monitoring System Certification

In accordance with Title 40 Code of the Federal Regulations (40 C.F.R.), Part 257, Subpart D, Section (§) 257.91(f) the owner or operator of a coal combustion residuals (CCR) unit must obtain certification from a qualified professional engineer stating that the groundwater monitoring system at the CCR unit has been designed and constructed to meet the requirements of 40 C.F.R. § 257.91. If the groundwater monitoring system includes the minimum number of monitoring wells specified in 40 C.F.R. § 257.91(c)(1), the certification must document the basis supporting use of the minimum number of monitoring wells. Further, in accordance with 40 C.F.R. § 257.91(e)(1), when completing the groundwater monitoring system certification, the qualified professional engineer must be given access to documentation regarding the design, installation, development, and decommissioning of any monitoring wells, piezometers, and other measurement, sampling, and analytical devices.

The groundwater monitoring system designed and constructed for the Baldwin Power Plant (BPP) Fly Ash Pond System (FAPS) includes more than the minimum number of wells specified in 40 C.F.R. § 257.91(c)(1). The undersigned has been given access to documentation regarding the design, installation, development, and decommissioning of monitoring wells, piezometers and other measurement, sampling, and analytical devices concerning the BPP FAPS.

*I, Eric J. Tlachac, a qualified professional engineer in good standing in the State of Illinois, certify that the groundwater monitoring system at the BPP FAPS has been designed and constructed to meet the requirements of 40 C.F.R. § 257.91.*



Eric J. Tlachac  
Qualified Professional Engineer  
062-063091  
Illinois  
Date: December 28, 2022



*I, Brian G. Hennings, a qualified professional geologist in good standing in the State of Illinois, certify that the groundwater monitoring system at the BPP FAPS has been designed and constructed to meet the requirements of 40 C.F.R. § 257.91.*



Brian G. Hennings  
Professional Geologist  
196-001482  
Illinois  
Date: December 28, 2022



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## ACRONYMS AND ABBREVIATIONS

35 I.A.C.	Title 35 of the Illinois Administrative Code
40 C.F.R.	Title 40 of the Code of Federal Regulations
§	section
ASD	Alternate Source Demonstration
bgs	below ground surface
BAP	Bottom Ash Pond
BPP	Baldwin Power Plant
CCA	compliance commitment agreement
CCR	coal combustion residuals
Closure Plan	<i>Baldwin Fly Ash Pond System Closure Plan, Post-Closure Plan</i>
Cooling Pond	Baldwin Lake
CMA	Corrective Measures Assessment
CSM	Conceptual site model
DMG	Dynegy Midwest Generation, LLC
FAPS	Fly Ash Pond System
GMP	Groundwater Monitoring Plan
GWPS	groundwater protection standard
HBL	health-based level
HCR	Hydrogeologic Site Characterization Report
ID	identification
IEPA	Illinois Environmental Protection Agency
LCL	lower confidence limit
LPL	lower prediction limit
MCL	maximum contaminant level
mp	measuring point
NID	National Inventory of Dams
No.	number
NPDES	National Pollutant Discharge Elimination System
NRT	Natural Resource Technology, Inc.
NRT/OBG	Natural Resource Technology, an OBG Company
PMP	potential migration pathway
QAPP	Multi-Site Quality Assurance Project Plan
QA/QC	quality assurance/quality control
Ramboll	Ramboll Americas Engineering Solutions, Inc.
RL	reporting limit
SAP	Multi-Site Sampling and Analysis Plan
SI	surface impoundment
Site	the FAPS
SSL	statistically significant level
SSI	statistically significant increase
TDS	total dissolved solids
UA	Uppermost Aquifer

UPL	upper prediction limit
UTL	upper tolerance limit
USEPA	United States Environmental Protection Agency

# 1. INTRODUCTION

## 1.1 Overview

Ramboll Americas Engineering Solutions, Inc. (Ramboll) has prepared this Groundwater Monitoring Plan (GMP) on behalf of BPP (**Figure 1-1**), operated by Dynegy Midwest Generation, LLC (DMG) to align the 40 C.F.R. § 257 compliance groundwater monitoring program with the Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845 compliance groundwater monitoring program.

This GMP applies specifically to the CCR Multi-Unit referred to as the FAPS (CCR unit identification [ID] number [No.] 605 and National Inventory of Dams [NID] No. IL50723). The FAPS consists of three CCR surface impoundments (SIs) including the Old East Fly Ash Pond System (Illinois Environmental Protection Agency [IEPA] ID No. W1578510001-01), the East Fly Ash Pond (IEPA ID No. W1578510001-02), and the West Fly Ash Pond (IEPA ID No. W1578510001-03) (**Figure 1-2**). The FAPS is a closed, unlined CCR Multi-Unit that was previously used to manage CCR and non-CCR waste streams at the BPP.

AECOM submitted the *Closure and Post-Closure Care Plan for the Baldwin Fly Ash Pond System* (Closure Plan) dated March 2016, which was approved by the IEPA on August 16, 2016. The Closure Plan included the Groundwater Monitoring Plan (Natural Resource Technology, Inc. [NRT], 2016) which defined groundwater monitoring for the FAPS following approval of the Closure Plan. Closure of the FAPS was completed on November 17, 2020.

On April 21, 2021, 35 I.A.C. § 845 became effective, and for CCR units closed prior to the effective date the following section was included (35 I.A.C. § 845.100(i)):

*If a CCR surface impoundment has completed an Agency-approved closure before April 21, 2021, this Part does not require the owner or operator of the CCR surface impoundment to resubmit to the Agency any closure plan, closure report, or closure certification for that completed closure.*

This GMP 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) for the FAPS.

## 1.2 Site Location and Background

The BPP is located in southwest Illinois in Randolph and St. Clair Counties. The Randolph County portion of the BPP is located within Sections 2, 3, 4, 9, 10, 11, 14, 15, and 16 of Township 4 South and Range 7 West. The St. Clair County portion of the property is located within Sections 33, 34, and 35 of Township 3 South and Range 7 West. The FAPS is approximately one-half mile west-northwest of the Village of Baldwin (**Figure 1-1**).

The BPP property is bordered to the west by the Kaskaskia River; to the east by Baldwin Road, farmland, and strip-mining areas; to the southeast by the village of Baldwin; to the south by the Illinois Central Gulf railroad tracks, scattered residences, and State Route 154; and to the north by farmland. The St. Clair/Randolph County Line crosses east-west at approximately the midpoint of Baldwin Lake (*i.e.*, Cooling Pond). **Figure 1-1** shows the location of the BPP; **Figure 1-2** is a site map showing the location of the FAPS (the subject of this GMP), Bottom Ash Pond (BAP),



Secondary Pond, Tertiary Pond, and Cooling Pond. Information regarding the BAP, Secondary Pond, Tertiary Pond, and Cooling Pond is solely for background information, as this GMP applies specifically to the FAPS CCR unit, which will hereinafter be referred to as the Site.

### 1.3 Conceptual Site Model

Multiple site investigations have been completed at the BPP to characterize the geology, hydrogeology, and groundwater quality as required by 40 C.F.R. § 257.91 (Groundwater Monitoring Systems). The FAPS has been well characterized, as detailed in the Hydrogeologic Site Characterization Report (HCR) (Ramboll, 2021) [<https://www.luminant.com/ccr/illinois-ccr/?dir=il-ccr%2FBaldwin%2F2021>] that was included with the Operating Permit application submitted to the IEPA. The HCR was prepared to comply with the requirements specified in 35 I.A.C. § 845.620 and expands upon the Hydrogeologic Monitoring Plan (Natural Resource Technology, an OBG Company [NRT/OBG], 2017). A conceptual site model (CSM) has been developed and is discussed below.

Three hydrostratigraphic units are present at the Site:

- **CCR:** CCR, consisting primarily of fly ash, bottom ash, and boiler slag. Also includes earthen fill deposits of predominantly clay and silt materials from on-site excavations that were used to construct berms and roads surrounding the various impoundments across the Site.
- **Upper Groundwater Unit:** Predominantly clay with some silt and minor sand, silt layers, and occasional sand lenses. Includes the lithologic layers identified as the Cahokia Alluvium, Peoria Loess, Equality Formation, and Vandalia Till Member. This unit is composed of unlithified natural geologic materials and extends from the water table to the bedrock. Thin sand seams and the interface (contact) between the Upper Groundwater Unit and bedrock have been identified as potential migration pathways (PMPs).
- **Bedrock Unit:** This unit is considered the Uppermost Aquifer (UA) and is composed of interbedded shale and limestone bedrock, which underlies and is continuous across the entire Site.

Groundwater occurs within both the unlithified materials and bedrock and flows to the west and southwest toward a current and historic drainage feature and bedrock valley. Groundwater flow in both the Upper Groundwater Unit and the Bedrock Unit are to the west and southwest toward the historic drainage feature and bedrock valley. The receiving surface water bodies for groundwater in the Upper Groundwater Unit are assumed to be the Secondary and Tertiary ponds, while the receiving surface water body for groundwater in the Bedrock Unit is the Kaskaskia River (**Figure 1-3 and Figure 1-4**). Immediately upgradient and downgradient of the BPP property boundaries, both the shallow glacial deposits and the shallow bedrock have served as a source of water supply. The shallow unlithified deposits off-site have yielded water through intermittent, discontinuous sand lenses and, in the bedrock, through fractured sandstone and limestone. However, within the area of the Site, investigations have indicated only thin and intermittent sand lenses are present within predominantly clay deposits; thus, the unlithified materials do not represent a continuous aquifer unit. Based on these details, the Bedrock Unit was designated as the UA in the Supplemental Hydrogeologic Site Characterization and Groundwater Monitoring Plan (Natural Resources Technology, Inc. [NRT], 2016), consistent with the United States Environmental Protection Agency (USEPA) definition in 40 C.F.R. § 257.53 (USEPA, 2015).

Water quality in the UA (*i.e.*, Pennsylvanian and Mississippian-aged bedrock) decreases with increasing depth as water becomes increasingly mineralized. Further, the ability of the unit to store and transmit water is dependent on the density of bedrock features that contribute to secondary porosities and whether those features are interconnected enough to yield water. Therefore, the lower limit of the UA is the depth at which either the groundwater is mineralized to a point that it is no longer a useable water source, or the secondary porosities do not yield a sufficient volume of groundwater to produce a useable water supply.

## 2. GROUNDWATER MONITORING SYSTEMS

Historically, five monitoring programs specific to the FAPS existed, the National Pollutant Discharge Elimination System (NPDES) Permit monitoring program, the IEPA Operating Permit monitoring program, the Closure Plan monitoring program, the 40 C.F.R. § 257 monitoring program, and the 35 I.A.C. § 845 monitoring program. Groundwater monitoring at the FAPS is currently being performed in accordance with Special Condition No. 5 of IEPA Operating Permit 2020-EA-65016, under Section 6.8 of the approved Closure Plan, and 40 C.F.R. § 257. This GMP is being provided to expand the 40 C.F.R. § 257 groundwater monitoring network and monitoring program specific to the FAPS to align with the monitoring network established for 35 I.A.C. § 845. Monitoring networks and programs that apply to other units are not discussed in this GMP. DMG entered into a compliance commitment agreement (CCA) with the IEPA on December 28, 2022. Groundwater monitoring in accordance with the CCA and the 35 I.A.C. § 845 proposed groundwater monitoring plan and sampling methodologies provided in the operating permit application for the FAPS is scheduled to commence no later than the second quarter of 2023. After the FAPS has been issued an approved operating permit, groundwater monitoring shall be conducted in accordance with that operating permit. As specified in the CCA, groundwater sampling requirements that apply to the CCR SI under other existing permit programs will become void upon issuance of an approved operating permit pursuant to 35 I.A.C § 845. In addition, and in accordance with the CCA, once quarterly groundwater monitoring commences, the groundwater monitoring performed under Section 6.8 of the approved Closure Plan will cease.

### 2.1 NPDES Permit Monitoring Network

The NPDES permit updated in 2022 no longer requires sampling of groundwater monitoring wells effective November 1, 2022.

The NPDES monitoring well network associated with the BAP and FAPS included ten compliance monitoring wells (MW-150, MW-350, MW-152, MW-252, MW-352, MW-153, MW-253, MW-154, MW-155, and MW-355) and two background monitoring wells (MW-104SR and MW-104DR).

These wells were sampled and analyzed quarterly for the laboratory and field parameters as required by Special Condition No. 17 of NPDES Permit IL0000043 listed in **Table A** on the following page. The NPDES monitoring program is supplemented by two locations (MW-156 and MW-157S) screened in unlithified materials and monitored for field parameters only. The NPDES Permit monitoring network well locations are shown on **Figure 2-1**.

Nine of the BAP and FAPS NPDES monitoring program wells (MW-104SR, MW-104DR, MW-150, MW-152, MW-153, MW-154, MW-155, MW-252, and MW-253) are screened in the unlithified materials (*i.e.*, PMP) and three wells (MW-350, MW-352 and MW-355) are screened in the bedrock (*i.e.*, UA). The two supplemental monitoring wells (MW-156 and MW-157S) are screened in the unlithified materials (*i.e.*, PMP).

Results are submitted to IEPA by February 28 of the following year as required by the NPDES Permit.

**Table A. NPDES Permit Groundwater Monitoring Program Parameters**

Field Parameters <sup>1</sup>		
pH	Depth to Water (bgs; feet)	
Groundwater Elevation (feet)	Depth to Water (below mp; feet)	
Specific Conductance	Elevation of mp; feet	
Temperature		
Inorganics		
Chloride (dissolved)	Sulfate (dissolved)	
Nitrate	TDS	
Metals		
Boron (dissolved)	Iron (total)	Manganese (total)

<sup>1</sup> Dissolved oxygen, oxidation/reduction potential, and turbidity are recorded during sample collection.

bgs – below ground surface

mp – measuring point

TDS – total dissolved solids

## 2.2 IEPA Operating Permit Monitoring Program

The IEPA Operating Permit monitoring well network consists of seventeen monitoring wells, including two background monitoring wells (MW-304 and MW-306) installed in bedrock, three compliance wells (MW-350, MW352, and MW-355) installed in bedrock, ten compliance wells (MW-104SR, MW-104DR, MW-150, MW-151, MW-152, MW-252, MW-153, MW-253, MW-154, and MW-155) installed in unlithified materials, and two supplemental monitoring wells (OW-156<sup>1</sup> and OW-157S<sup>1</sup>) installed in the unlithified materials. These wells are monitored in accordance with Special Condition No. 5 of IEPA Operating Permit 2020-EA-65016, issued on March 31, 2020. The IEPA Operating Permit monitoring network well locations are shown on **Figure 2-1**.

The IEPA Operating Permit monitoring network wells are sampled quarterly for the laboratory and field parameters as required in Special Condition No. 5 of IEPA Operating Permit 2020-EA-65016 listed in **Table B** on the following page. OW-156 and OW-157 are monitored for field parameters only. Results are submitted to IEPA by February 28 of the following year as required by the IEPA Operating Permit.

<sup>1</sup> OW-156 and OW-157 are identified in NPDES Permit IL0000043 as MW-156 and MW-157S, respectively.

**Table B. IEPA Operating Permit Groundwater Monitoring Program Parameters**

<b>Field Parameters<sup>1</sup></b>		
pH	Depth to Water (bgs; feet)	Groundwater Elevation (feet)
Specific Conductance	Depth to Water (below mp; feet)	
Temperature	Elevation of mp; feet	
<b>Inorganics</b>		
Chloride (dissolved)	Sulfate (dissolved)	
Nitrate	TDS	
<b>Metals</b>		
Boron (dissolved)	Iron (total)	Manganese (total)

<sup>1</sup> Dissolved oxygen, oxidation/reduction potential, and turbidity are recorded during sample collection.

### 2.3 IEPA Closure Plan Monitoring Program

The approved IEPA Closure Plan monitoring well network and monitored parameters align with the monitoring locations (**Figure 2-1**) and parameters included in the IEPA Operating Permit monitoring well program detailed above in **Section 2.2**.

Sampling and analysis data from quarterly, semiannual and/or annual groundwater monitoring for the modified NPDES monitoring well network will be reported to Illinois EPA within 60 days after completion of sampling. Statistical analysis of the laboratory analytical data will be reported to Illinois EPA with the annual report for the facility, as described in the closure plan.

### 2.4 Existing 40 C.F.R. § 257 Monitoring Program

The 40 C.F.R. § 257 monitoring well network consists of ten bedrock groundwater monitoring wells used to monitor the UA, including two background wells (MW-304 and MW-306) and eight compliance wells (MW-350, MW-366, MW-375, MW-377, MW-383, MW-384, MW-390, and MW-391). The 40 C.F.R. § 257 monitoring well network locations are shown on **Figure 2-1**.

Assessment monitoring in accordance with 40 C.F.R. § 257.95 was initiated on April 9, 2018. Details on the procedures and techniques used to fulfill the groundwater sampling and analysis program requirements are found in the Multi-Site Sampling and Analysis Plan (SAP) (Ramboll, 2022a).

Groundwater samples are collected semiannually and analyzed for the following laboratory and field parameters from Appendix III and Appendix IV of 40 C.F.R. § 257, summarized in **Table C** on the following page.

**Table C. 40 C.F.R. § 257 Groundwater Monitoring Program Parameters**

<b>Field Parameters<sup>1</sup></b>			
Groundwater Elevation	pH		
<b>Appendix III Parameters (Total, except TDS)</b>			
Boron	Chloride	Sulfate	
Calcium	Fluoride	TDS	
<b>Appendix IV Parameters (Total)</b>			
Antimony	Cadmium	Lithium	Selenium
Arsenic	Chromium	Mercury	Thallium
Barium	Cobalt	Molybdenum	Radium 226 and 228 combined
Beryllium	Lead		

<sup>1</sup> Dissolved oxygen, temperature, specific conductance, oxidation/reduction potential, and turbidity are recorded during sample collection.

Results and analysis of groundwater sampling are reported annually by January 31 of the following year and made available on the CCR public website as required by 40 C.F.R. § 257.

**2.5 35 I.A.C. § 845 Monitoring Program**

The 35 I.A.C. § 845 monitoring well network consists of seventeen wells, including two background monitoring wells (MW-304 and MW-306) installed in bedrock, nine compliance wells (MW-350, MW-352, MW-366, MW-375, MW-377, MW-383, MW-384, MW-390, and MW-391) installed in bedrock, and six compliance wells (MW-150, MW-151, MW-152, MW-153, MW-252, and MW-253) installed within the unlithified materials, considered to be the potential migration pathway (PMP).

Groundwater samples are collected quarterly and analyzed for the laboratory and field parameters from 35 I.A.C. § 845.600 as summarized in **Table D** on the following page.

The groundwater samples collected from the seventeen wells are used to monitor and evaluate groundwater quality and demonstrate compliance with the groundwater quality standards listed in 35 I.A.C. § 845.600(a).

**Table D. 35 I.A.C. § 845 Groundwater Monitoring Program Parameters**

<b>Field Parameters<sup>1</sup></b>			
Groundwater Elevation	pH	Turbidity	
<b>Metals (Total)</b>			
Antimony	Boron	Cobalt	Molybdenum
Arsenic	Cadmium	Lead	Selenium
Barium	Calcium	Lithium	Thallium
Beryllium	Chromium	Mercury	
<b>Inorganics (Total)</b>			
Fluoride	Sulfate	Chloride	TDS
<b>Other (Total)</b>			
Radium 226 and 228 combined			

<sup>1</sup> Dissolved oxygen, temperature, specific conductance, and oxidation/reduction potential were recorded during sample collection.

## 2.6 Expansion of Existing 40 C.F.R. § 257 Monitoring Program

The existing 40 C.F.R. § 257 network is being expanded to consist of the same two background monitoring wells (MW-304 and MW-306) installed in bedrock, nine compliance wells (MW-350, MW-352, MW-366, MW-375, MW-377, MW-383, MW-384, MW-390, and MW-391) installed in bedrock, and six compliance wells (MW-150, MW-151, MW-152, MW-153, MW-252, and MW-253) installed within the unlithified materials (*i.e.*, PMP) as the 35 I.A.C. § 845 monitoring program. The proposed network is summarized in **Table E** on the following page and displayed on **Figure 2-2**. Seventeen wells (two background and 15 compliance) will be used to monitor groundwater concentrations within the UA and PMP.

The groundwater samples collected from the 17 wells will be used to monitor and evaluate groundwater quality and demonstrate compliance with the groundwater quality standards included in 40 C.F.R. § 257.94(e) and 40 C.F.R. § 257.95(h). The proposed monitoring wells will yield groundwater samples that accurately represent the quality of background groundwater that has not been affected by leakage from the FAPS, as well as downgradient groundwater at the waste boundary of the FAPS (as required in 40 C.F.R. § 257.91(a)(1) and (2)). Monitoring well depths and construction details are listed in **Table 2-1** and summarized in **Table E** on the following page.

Any future changes to the groundwater monitoring well network as approved by the IEPA under 35 I.A.C. § 845, as discussed earlier in Section 2.1.1, will also be incorporated into the 40 C.F.R. § 257 network.

**Table E. Expanded 40 C.F.R. § 257 Monitoring Well Network**

<b>Well ID</b>	<b>Monitored Unit</b>	<b>Well Screen Interval (feet bgs)</b>	<b>Well Type<sup>1</sup></b>
<b>MW-150</b>	PMP	15.0 – 24.7	Compliance
<b>MW-151</b>	PMP	6.1 – 15.8	Compliance
<b>MW-152</b>	PMP	7.5 – 16.7	Compliance
<b>MW-153</b>	PMP	10.4 – 20.0	Compliance
<b>MW-252</b>	PMP	44.4 – 49.0	Compliance
<b>MW-253</b>	PMP	29.9 – 34.5	Compliance
<b>MW-304</b>	UA	45.0 – 55.0	Background
<b>MW-306</b>	UA	72.7 – 87.7	Background
<b>MW-350</b>	UA	41.6 – 46.2	Compliance
<b>MW-352</b>	UA	67.9 – 72.5	Compliance
<b>MW-366</b>	UA	42.0 – 52.0	Compliance
<b>MW-375</b>	UA	57.0 – 67.0	Compliance
<b>MW-377</b>	UA	46.0 – 56.0	Compliance
<b>MW-383</b>	UA	58.0 – 68.0	Compliance
<b>MW-384</b>	UA	60.5 – 70.5	Compliance
<b>MW-390</b>	UA	50.0 – 65.0	Compliance
<b>MW-391</b>	UA	55.0 – 70.0	Compliance

<sup>1</sup> Well Type refers to the role of the well in the monitoring network.

bgs = below ground surface

PMP = potential migration pathway

## 2.7 Well Abandonment

No wells are currently proposed for abandonment.

## 2.8 Groundwater Monitoring System Maintenance Plan

Maintenance procedures provided in the SAP and will be performed as needed to assure that the monitoring wells provide representative groundwater samples (Ramboll, 2022a).



### 3. GROUNDWATER MONITORING PLAN

The groundwater monitoring plan will monitor and evaluate groundwater quality to demonstrate compliance with the groundwater quality standards included in 40 C.F.R. § 257.94(e) and 40 C.F.R. § 257.95(h). The groundwater monitoring program will include sampling and analysis procedures that are consistent and provide an accurate representation of groundwater quality at the background and downgradient wells as required by 40 C.F.R. § 257.91. As discussed in **Section 2**, five monitoring programs specific to the FAPS exist, the NPDES Permit monitoring program, the IEPA Operating Permit monitoring program, the Closure Plan monitoring program, the 40 C.F.R. § 257 monitoring program, and the 35 I.A.C. § 845 monitoring program. As specified in the CCA, groundwater sampling requirements that apply to the CCR SI under other existing permit programs will become void upon issuance of an approved operating permit pursuant to 35 I.A.C § 845. In addition, and in accordance with the CCA, once quarterly groundwater monitoring commences, the groundwater monitoring performed under Section 6.8 of the approved Closure Plan will cease.

#### 3.1 Sampling Schedule

Groundwater sampling for the 40 C.F.R. § 257 monitoring well network was initially performed quarterly between 2015 and 2017 to establish baseline groundwater quality. Detection monitoring began in the first quarter of 2017 with semiannual sampling. Assessment monitoring began in the second quarter of 2018. The FAPS is currently in assessment monitoring and sampling will continue in 2023 according to the schedule summarized in **Table F** on the following page.

**Table F. 40 C.F.R. § 257 Sampling Schedule**

Frequency	Duration
Quarterly (groundwater quality)	<p><b>Baseline</b></p> <p>Began: monitoring began in 2015.</p> <hr/> <p>Ended: monitoring was completed in 2017 to establish baseline groundwater quality for existing landfills and SIs.</p>
At least Semi-annually (groundwater quality)	<p><b>Detection Monitoring</b></p> <p>Begins: monitoring began no later than October 17, 2017, for existing landfills and SIs, following collection of a minimum of eight independent samples for constituents from Appendix III and Appendix IV from each background and downgradient well.</p> <p>At least semiannual sampling continues for Appendix III constituents throughout the active life of the CCR unit and the post-closure period.</p> <p>For new landfills and SIs, and lateral expansion of existing CCR units, a minimum of eight independent samples from each background well must be collected and analyzed for the constituents in Appendix III and Appendix IV during the first six months of sampling.</p> <hr/> <p>Ends: Following 30-year post-closure care period or statistically significant increase (SSI) determination and unsuccessful Alternate Source Demonstration (ASD) evaluation within 90 days of SSI determination.</p> <hr/> <p><b>Assessment Monitoring</b></p> <p>Begins: within 90 days of unsuccessful ASD evaluation for SSIs determined during Detection Monitoring; samples must be collected and analyzed for all constituents listed in Appendix IV. Within 90 days of obtaining the of the initial sample results, and on at least a semiannual basis thereafter, wells must be resampled for Appendix III and for those constituents in Appendix IV that have been detected during sampling.</p> <hr/> <p>Ends: Following demonstration that concentrations of all constituents in Appendices III and IV are below background values for two consecutive sampling events.</p>

Groundwater monitoring for the 40 C.F.R. § 257 well network will continue to follow a schedule in accordance with the requirements of 40 C.F.R. § 257.94 and 40 C.F.R. § 257.95. Upon USEPA approval of 35 I.A.C. § 845 as a State CCR Permit Program, the 40 C.F.R. § 257 monitoring will be discontinued and replaced by the 35 I.A.C. § 845 monitoring.

### 3.2 Groundwater Sample Collection

Groundwater sampling procedures have been developed in the SAP (Ramboll, 2022a) and the collection of groundwater samples is being implemented to meet the requirements of 40 C.F.R. § 257.93. In addition to groundwater well samples, quality assurance samples will be collected as described in the Multi-Site Quality Assurance Project Plan (QAPP) (Ramboll, 2022b).

### 3.3 Laboratory Analysis

Laboratory analysis will be performed consistent with the specifications of the QAPP. Laboratory methods may be modified based on laboratory equipment availability or procedures, but the Reporting Limit (RL) for all parameters analyzed, regardless of method, will be lower than the applicable groundwater quality standard. Data reporting requirements and workflow are provided in the Multi-Site Data Management Plan (Ramboll, 2022c).

### **3.4 Quality Assurance Program**

The QAPP includes procedures and techniques for laboratory quality assurance/quality control (QA/QC). Additionally, the SAP includes requirements for field data collection QA/QC.

### **3.5 Statistical Analysis**

A Multi-Site Statistical Analysis Plan (Ramboll, 2022d) has been developed to describe procedures that will be used to establish background conditions and determine SSIs over background concentrations and statistically significant levels (SSLs) over groundwater protection standards (GWPSs) as required by 40 C.F.R. § 257.94 and 257.95. The Multi-Site Statistical Analysis Plan was prepared in accordance with the requirements of 40 C.F.R. § 257.93(f), with reference to the acceptable statistical procedures provided in *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance* (USEPA, 2009). The determination of SSIs over background concentrations and SSLs over GWPSs will be completed at least Semiannually in accordance with the sampling schedule provided in **Section 3.1**.

### **3.6 Data Reporting**

Data reporting for the 40 C.F.R. § 257 monitoring well network will be consistent with recordkeeping, notification, and internet posting requirements described in 40 C.F.R. § 257.105 through 257.107.

### **3.7 Compliance with Applicable On-site Groundwater Quality Standards**

Compliance with the groundwater quality standards for the detection monitoring program referenced in 40 C.F.R. § 257.94(e) and the assessment monitoring program referenced in 40 C.F.R. § 257.95(h) will be determined as described in the following sections.

#### **3.7.1 SSI Determination in Detection Monitoring**

One-sided upper prediction limits (UPL) will be calculated for each Appendix III constituent using the background samples, with the exception of pH, for which both upper and lower prediction limits will be calculated. A tabular summary of UPLs will be provided in the Annual Groundwater Monitoring and Corrective Action Reports. Individual sampling event concentrations for each constituent detected in the downgradient monitoring wells will then be compared to the background UPL. An exceedance of the UPL for any constituent measured at any downgradient well constitutes an SSI. For pH, a measurement above the UPL or below the lower prediction limit (LPL) constitutes an SSI. As required by 40 C.F.R. § 257.93(h)(2), SSI determination will be completed within 90 days of sampling and analysis.

#### **3.7.2 GWPS and SSL Determination in Assessment Monitoring**

A GWPS will be established for Appendix IV constituents. The GWPS will be either the USEPA maximum contaminant levels (MCLs) or the health-based levels (HBLs) established in 40 C.F.R. § 257.95(h)(2) for cobalt, lead, lithium, and molybdenum. The exception to this is when the background concentration is greater than the established MCL or HBL. For this exception, background concentrations will be used to define the GWPS. The background will be calculated using a parametric or non-parametric upper tolerance limit (UTL), depending on the data distribution. A tabular summary of GWPSs will be provided in the Annual Groundwater Monitoring and Corrective Action Reports.

Compliance will be determined by comparing the lower confidence limit (LCL) of the downgradient concentrations to the GWPS. An SSL will be identified when the LCL exceeds the GWPS. The method of calculating the LCL is described in the Multi-Site Statistical Analysis Plan. If there are too few data points to calculate an LCL (a minimum of four data points is required), the most recent data point is compared to the GWPS. If all the downgradient samples for a well constituent pair are non-detect, the most recent RL is compared to the GWPS. Additionally, an SSL will be identified if all previous samples at a downgradient well were not-detect, and the two most recent samples have both detections and GWPS exceedances. SSL determination will be completed within 90 days of sampling and analysis.

### **3.8 Alternate Source Demonstrations**

An ASD may be completed for a unit under the detection monitoring program in 40 C.F.R. § 257.94(e)(2) or assessment monitoring program in 40 C.F.R. § 257.95(g)(3)(ii) to provide lines of evidence that a source other than the monitored unit caused the SSI/SSL or that the SSI/SSL resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. The ASD will include information and analysis that supports the conclusions and a certification of accuracy by a qualified professional engineer. ASDs will be completed within 90 days of SSI/SSL determination and be provided in the Annual Groundwater Monitoring and Corrective Action Reports as required by 40 C.F.R. § 257.94(e)(2) and 40 C.F.R. § 257.95(g)(3)(ii).

#### **3.8.1 Detection Monitoring Program**

As allowed in 40 C.F.R. § 257.94(e)(2), following the determination of an SSI over background for groundwater constituents listed in Appendix III of 40 C.F.R. § 257, an ASD will be evaluated, and if completed within 90 days of the SSI determination, detection monitoring will continue.

If an ASD has not been successfully completed within 90 days of the SSI determination, Assessment Monitoring in accordance with 40 C.F.R. § 257.95 will be initiated within 90 days and the associated notification will be made to the CCR unit operating record and state director (and/or appropriate tribal authority, if applicable).

#### **3.8.2 Assessment Monitoring Program**

As allowed in 40 C.F.R. § 257.95(g)(3)(ii), following the determination of an SSL over the GWPS of constituents listed in Appendix IV of 40 C.F.R. § 257, an ASD will be evaluated and, if completed within 90 days of the SSL determination, assessment monitoring will continue.

If an ASD has not been successfully completed within the 90 days of the SSL determination, a Corrective Measures Assessment (CMA) in accordance with 40 C.F.R. § 257.96 will be initiated and the associated notification will be made to the CCR unit operating record and state director (and/or appropriate tribal authority, if applicable).

### **3.9 Corrective Action**

As described in 40 C.F.R. § 257.96, if the ASD summarized in **Section 3.8** has not been successfully completed, the CMA must be completed within 90 days, unless the owner or operator demonstrates the need for up to an additional 60 days to complete the CMA due to site-specific conditions of circumstances.

Remedy selection will follow the CMA and be documented in a remedy selection report in accordance 40 C.F.R. § 257.97. A corrective action monitoring plan will be developed to monitor the performance of the selected remedy.

### **3.10 Annual Report**

An Annual Groundwater Monitoring and Corrective Action Report will be completed and placed in the CCR unit operating record by January 31<sup>st</sup> of the following calendar 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 40 C.F.R. §§ 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 an SSI relative to background levels).
5. Other information required to be included in the annual report as specified in 40 C.F.R. §§ 257.90 through 257.98.
6. A section at the beginning of the annual report that provides an overview of the current status of groundwater monitoring and corrective action programs for the CCR unit. At a minimum, the summary must specify all of the following:
  - i) At the start of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in § 257.94 or the assessment monitoring program in 40 C.F.R. § 257.95.
  - ii) At the end of the current annual reporting period, whether the CCR unit was operating under the detection monitoring program in 40 C.F.R. § 257.94 or the assessment monitoring program in 40 C.F.R. § 257.95.
  - iii) If it was determined that there was an SSI over background for one or more constituents listed in Appendix III of 40 C.F.R. § 257 pursuant to 40 C.F.R. § 257.94(e):
    - A. Identify those constituents listed in Appendix III of 40 C.F.R. § 257 and the names of the monitoring wells associated with such an increase.
    - B. Provide the date when the assessment monitoring program was initiated for the CCR unit.
  - iv) If it was determined that there was an SSL above the groundwater protection standard for one or more constituents listed in Appendix IV of 40 C.F.R. § 257 pursuant to 40 C.F.R. § 257.95(g) include all of the following:

- A. Identify those constituents listed in Appendix IV of 40 C.F.R. § 257 and the names of the monitoring wells associated with such an increase.
- B. Provide the date when the CMA was initiated for the CCR unit.
- C. Provide the date when the public meeting was held for the CMA.
- D. Provide the date when the CMA was completed.
- v) Whether a remedy was selected pursuant to 40 C.F.R. § 257.97 during the current annual reporting period, and if so, the date of remedy selection.
- vi) Whether remedial activities were initiated or are ongoing pursuant to 40 C.F.R. § 257.98 during the current annual reporting period.

## 4. REFERENCES

AECOM, 2016. *Closure and Post-Closure Care Plan for the Baldwin Fly Ash Pond System. Baldwin Energy Complex. Baldwin, Illinois.* March 31, 2016.

Illinois Environmental Protection Agency (IEPA), 2021. *Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments: Title 35 of the Illinois Administrative Code § 845.* April 15, 2021.

Natural Resource Technology, Inc. (NRT), 2016. *Supplemental Hydrogeologic Site Characterization and Groundwater Monitoring Plan. Baldwin Fly Ash Pond System, Baldwin Energy Complex. Baldwin, Illinois.* March 31, 2016.

Natural Resource Technology, an OBG Company (NRT/OBG), 2017. *Hydrogeologic Monitoring Plan. Baldwin Bottom Ash Pond – CCR Unit ID 601, Baldwin Fly Ash Pond System – CCR Multi-Unit ID 605. Baldwin Energy Complex, Baldwin, IL.* October 17, 2017.

Ramboll Americas Engineering Solutions, Inc. (Ramboll), 2021. *Hydrogeologic Site Characterization Report. Baldwin Bottom Ash Pond. Baldwin Power Plant. Baldwin, Illinois.* October 25, 2021.

Ramboll Americas Engineering Solutions, Inc. (Ramboll), 2022a. *Multi-Site Sampling and Analysis Plan.* December 28, 2022.

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Ramboll Americas Engineering Solutions, Inc. (Ramboll), 2022c. *Multi-Site Data Management Plan.* December 28, 2022.

Ramboll Americas Engineering Solutions, Inc. (Ramboll), 2022d. *Multi-Site Statistical Analysis Plan.* December 28, 2022.

United States Environmental Protection Agency (USEPA), 2009. *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities – Unified Guidance.* Office of Resource Conservation and Recovery, Program Implementation and Information Division, United States Environmental Protection Agency, Washington D.C. EPA/530/R-09/007. March 2009.

United States Environmental Protection Agency (USEPA), 2015. *Title 40 of the Code of Federal Regulations, Part 257.*

## **TABLES**



**TABLE 2-1. MONITORING WELL LOCATIONS AND CONSTRUCTION DETAILS**

GROUNDWATER MONITORING PLAN  
BALDWIN POWER PLANT  
FLY ASH POND SYSTEM  
BALDWIN, ILLINOIS

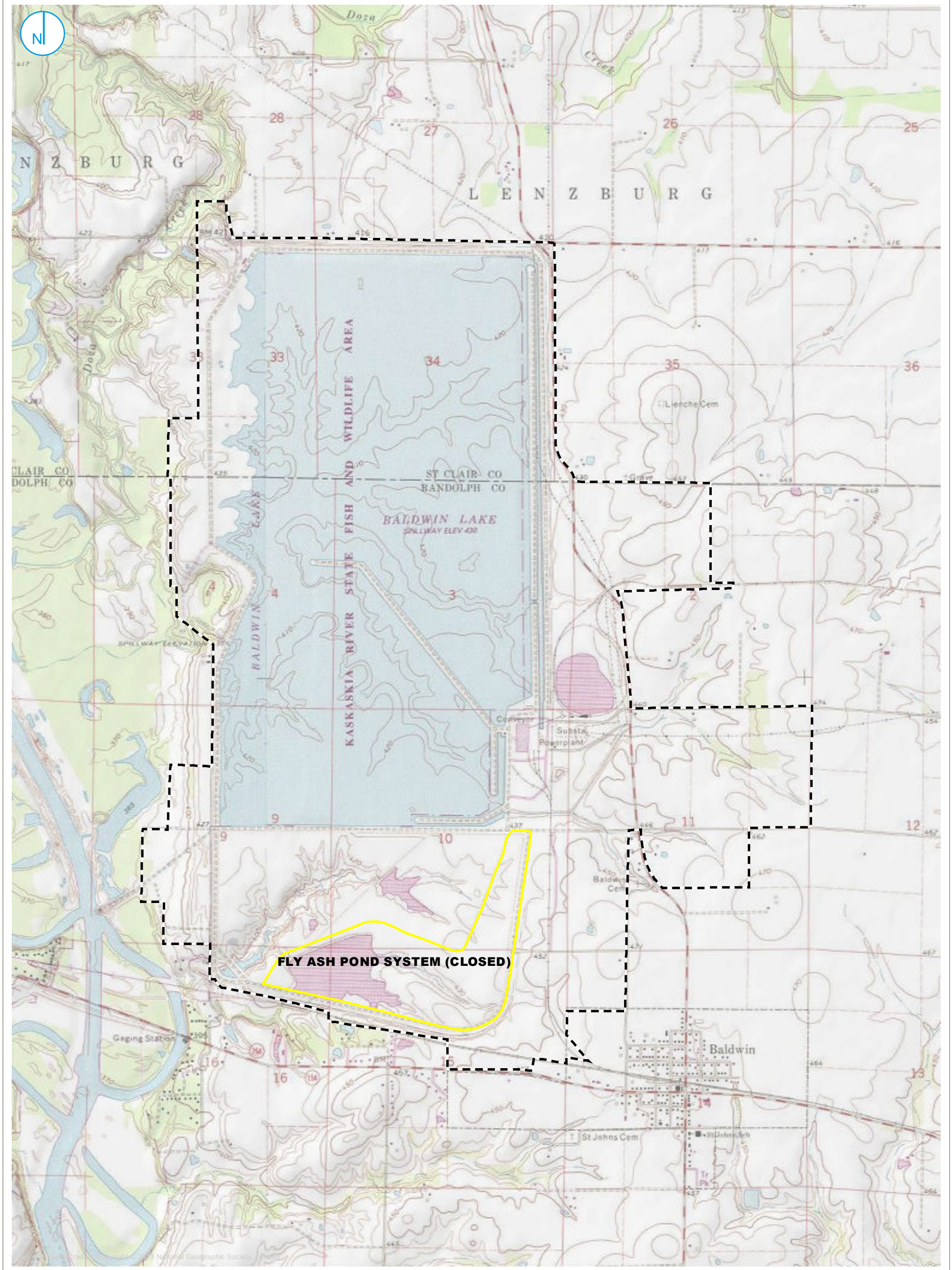
Well Number	Type	HSU	Date Constructed	Top of PVC Elevation (ft)	Measuring Point Elevation (ft)	Measuring Point Description	Ground Elevation (ft)	Screen Top Depth (ft BGS)	Screen Bottom Depth (ft BGS)	Screen Top Elevation (ft)	Screen Bottom Elevation (ft)	Well Depth (ft BGS)	Bottom of Boring Elevation (ft)	Screen Length (ft)	Screen Diameter (inches)	Latitude (Decimal Degrees)	Longitude (Decimal Degrees)
MW-150	C	PMP	09/01/2010	396.54	396.54	Top of PVC	393.84	15.00	24.70	378.80	369.20	25.20	368.70	9.6	2	38.189401	-89.878468
MW-151	C	PMP	09/01/2010	399.96	399.96	Top of PVC	397.22	6.10	15.80	391.10	381.40	16.30	380.90	9.6	2	38.188449	-89.872354
MW-152	C	PMP	09/01/2010	424.99	424.99	Top of PVC	422.18	7.50	16.70	414.70	405.50	17.20	405.00	9.3	2	38.187569	-89.866764
MW-153	C	PMP	09/01/2010	445.67	445.67	Top of PVC	442.77	10.40	20.00	432.40	422.80	20.50	422.30	9.6	2	38.185884	-89.86101
MW-252	C	PMP	09/01/2010	425.07	425.07	Top of PVC	422.27	44.40	49.00	377.90	373.20	49.50	372.70	4.6	2	38.187563	-89.866745
MW-253	C	PMP	09/01/2010	445.84	445.84	Top of PVC	442.70	29.90	34.50	412.80	408.20	35.00	407.70	4.6	2	38.185885	-89.861026
MW-304	B	UA	10/20/2015	455.49	455.49	Top of PVC	453.03	45.00	55.00	408.00	398.00	55.00	317.60	10	2	38.188332	-89.853441
MW-306	B	UA	09/25/1991	453.17	453.17	Top of PVC	450.91	72.70	87.70	378.20	363.20	87.70	361.20	15	2	38.20114	-89.846756
MW-350	C	UA	09/01/2010	396.80	396.80	Top of PVC	394.11	41.60	46.20	352.50	347.90	46.60	347.40	4.6	2	38.189416	-89.878477
MW-352	C	UA	09/01/2010	425.04	425.04	Top of PVC	422.36	67.90	72.50	354.50	349.80	73.00	348.60	4.6	2	38.187554	-89.866729
MW-366	C	UA	12/04/2015	425.08	425.08	Top of PVC	422.54	42.00	52.00	380.50	370.50	52.00	368.20	10	2	38.192191	-89.872345
MW-375	C	UA	11/06/2015	423.05	423.05	Top of PVC	420.50	57.00	67.00	363.50	353.50	67.00	335.80	10	2	38.189045	-89.873514
MW-377	C	UA	11/02/2015	421.36	421.36	Top of PVC	418.75	46.00	56.00	372.80	362.80	56.00	360.50	10	2	38.188386	-89.869742
MW-383	C	UA	12/21/2015	459.49	459.49	Top of PVC	457.18	58.00	68.00	399.20	389.20	68.00	384.20	10	2	38.194913	-89.858286
MW-384	C	UA	12/18/2015	458.95	458.95	Top of PVC	456.70	60.50	70.50	396.20	386.20	70.50	362.60	10	2	38.191789	-89.860699
MW-390	C	UA	03/04/2016	428.06	428.06	Top of PVC	425.98	50.00	65.00	376.00	361.00	65.00	358.00	15	2	38.192956	-89.869793
MW-391	C	UA	03/10/2016	426.63	426.63	Top of PVC	424.24	55.00	70.00	369.20	354.20	70.00	349.80	15	2	38.190869	-89.874759



**Notes:**

All elevation data are presented relative to the North American Vertical Datum 1988 (NAVD88), GEOID 12A  
 Type refers to the role of the well in the monitoring network: background (B), compliance (C), or water level measurements only (WLO)  
 WLO wells are temporary pending implementation of impoundment closure per an approved Construction Permit application  
 BGS = below ground surface  
 ft = foot or feet  
 HSU = Hydrostratigraphic Unit  
 PMP = potential migration pathway  
 PVC = polyvinyl chloride  
 UA = Uppermost Aquifer

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## FIGURES



 40 C.F.R. § 257 REGULATED UNIT (SUBJECT UNIT)  
 PROPERTY BOUNDARY

**SITE LOCATION MAP**

**FIGURE 1-1**

0 1,000 2,000  
 Feet

**40 C.F.R. § 257 GROUNDWATER MONITORING PLAN**  
**FLY ASH POND SYSTEM**  
 BALDWIN POWER PLANT  
 BALDWIN, ILLINOIS

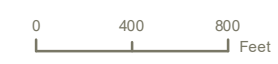
RAMBOLL AMERICAS  
 ENGINEERING SOLUTIONS, INC.





Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

- 40 C.F.R. § 257 REGULATED UNIT (SUBJECT UNIT)
- FLY ASH POND SYSTEM (CLOSED)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY



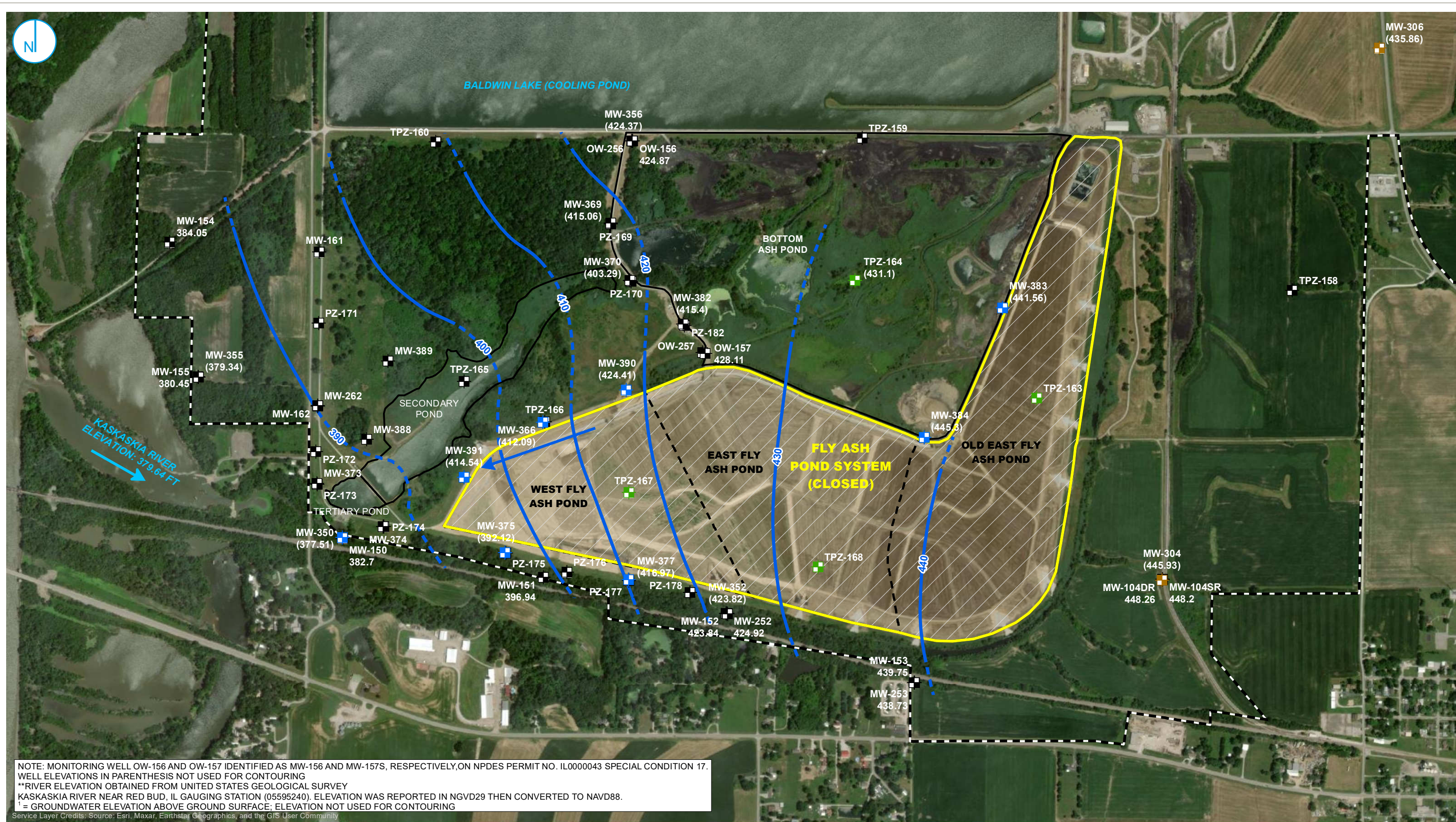
**SITE MAP**

**FIGURE 1-2**

**40 C.F.R. § 257 GROUNDWATER MONITORING PLAN**  
**FLY ASH POND SYSTEM**  
 BALDWIN POWER PLANT  
 BALDWIN, ILLINOIS

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NOTE: MONITORING WELL OW-156 AND OW-157 IDENTIFIED AS MW-156 AND MW-157S, RESPECTIVELY, ON NPDES PERMIT NO. IL0000043 SPECIAL CONDITION 17.  
 WELL ELEVATIONS IN PARENTHESIS NOT USED FOR CONTOURING  
 \*\*RIVER ELEVATION OBTAINED FROM UNITED STATES GEOLOGICAL SURVEY  
 KASKASKIA RIVER NEAR RED BUD, IL GAUGING STATION (05595240). ELEVATION WAS REPORTED IN NGVD29 THEN CONVERTED TO NAVD88.  
 † = GROUNDWATER ELEVATION ABOVE GROUND SURFACE; ELEVATION NOT USED FOR CONTOURING

- COMPLIANCE MONITORING WELL
- BACKGROUND MONITORING WELL
- PORE WATER WELL
- MONITORING WELL
- GROUNDWATER ELEVATION CONTOUR (10-FT CONTOUR INTERVAL, NAVD88)
- - - INFERRED GROUNDWATER ELEVATION CONTOUR
- GROUNDWATER FLOW DIRECTION
- 40 C.F.R. § 257 REGULATED UNIT (SUBJECT UNIT)
- FLY ASH POND SYSTEM (CLOSED)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY



**SHALLOW UNLITHIFIED POTENTIOMETRIC SURFACE MAP**  
**MARCH 24, 2020**

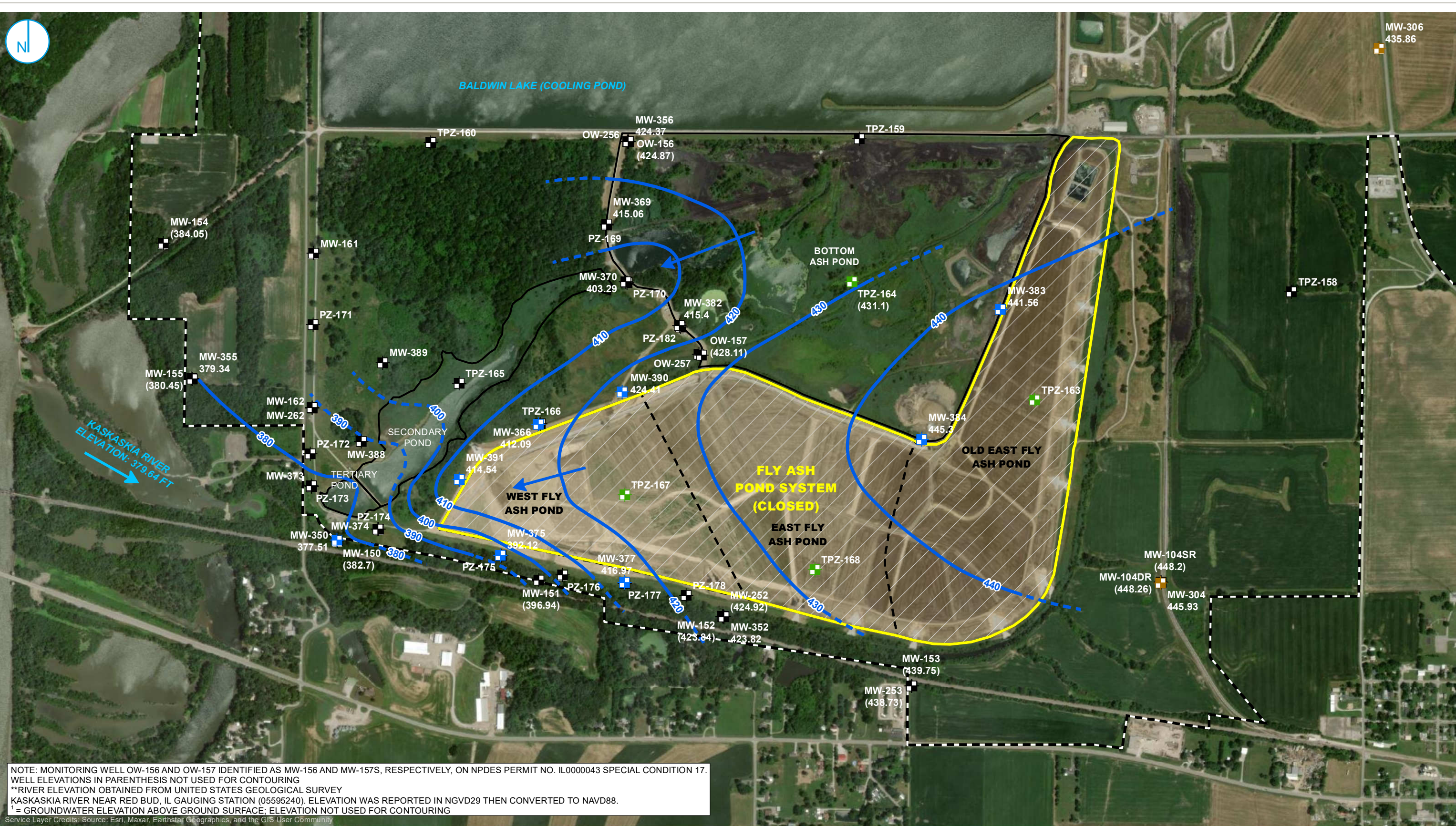
40 C.F.R. § 257 GROUNDWATER MONITORING PLAN  
 FLY ASH POND SYSTEM  
 BALDWIN POWER PLANT  
 BALDWIN, ILLINOIS

**FIGURE 1-3**

RAMBOLL AMERICAS  
 ENGINEERING SOLUTIONS, INC.



PROJECT: 169000XXXX | DATED: 1/12/2023 | DESIGNER: galammc



NOTE: MONITORING WELL OW-156 AND OW-157 IDENTIFIED AS MW-156 AND MW-157S, RESPECTIVELY, ON NPDES PERMIT NO. IL0000043 SPECIAL CONDITION 17.  
 WELL ELEVATIONS IN PARENTHESIS NOT USED FOR CONTOURING  
 \*\*RIVER ELEVATION OBTAINED FROM UNITED STATES GEOLOGICAL SURVEY  
 KASKASKIA RIVER NEAR RED BUD, IL GAUGING STATION (05595240). ELEVATION WAS REPORTED IN NGVD29 THEN CONVERTED TO NAVD88.  
 \* = GROUNDWATER ELEVATION ABOVE GROUND SURFACE; ELEVATION NOT USED FOR CONTOURING

- COMPLIANCE MONITORING WELL
- BACKGROUND MONITORING WELL
- PORE WATER WELL
- MONITORING WELL
- GROUNDWATER ELEVATION CONTOUR (10-FT CONTOUR INTERVAL, NAVD88)
- - - INFERRED GROUNDWATER ELEVATION CONTOUR
- GROUNDWATER FLOW DIRECTION
- 40 C.F.R. § 257 REGULATED UNIT (SUBJECT UNIT)
- FLY ASH POND SYSTEM (CLOSED)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY



**BEDROCK POTENTIOMETRIC SURFACE MAP**  
**MARCH 24, 2020**

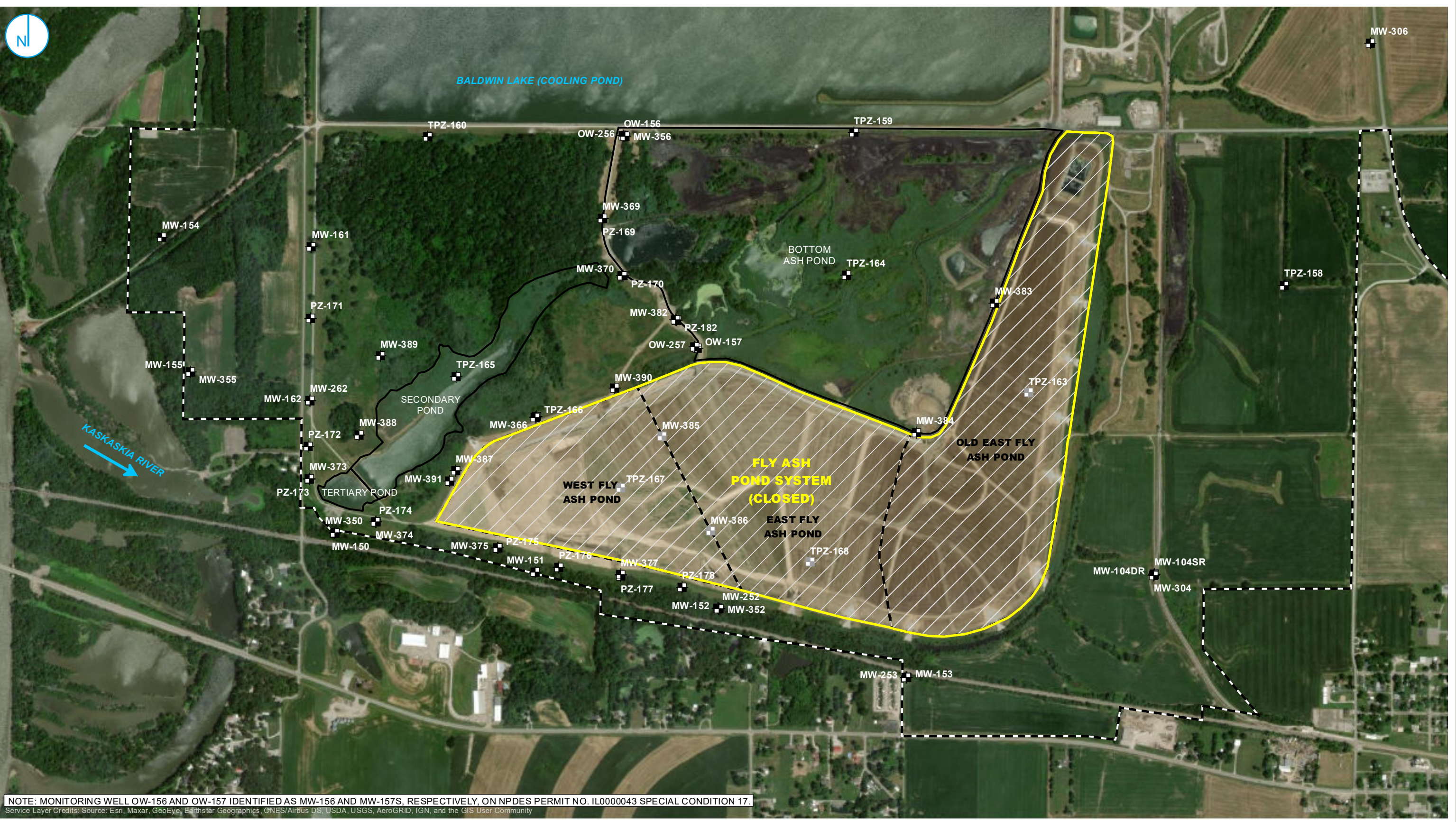
40 C.F.R. § 257 GROUNDWATER MONITORING PLAN  
 FLY ASH POND SYSTEM  
 BALDWIN POWER PLANT  
 BALDWIN, ILLINOIS

**FIGURE 1-4**

RAMBOLL AMERICAS  
 ENGINEERING SOLUTIONS, INC.



PROJECT: 169000XXXX | DATED: 10/15/2021 | DESIGNER: HOTCALD



NOTE: MONITORING WELL OW-156 AND OW-157 IDENTIFIED AS MW-156 AND MW-157S, RESPECTIVELY, ON NPDES PERMIT NO. IL000043 SPECIAL CONDITION 17.  
 Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

- MONITORING WELL AND PIEZOMETER LOCATIONS
- ABANDONED MONITORING WELL AND PIEZOMETER LOCATIONS
- 40 C.F.R. § 257 REGULATED UNIT (SUBJECT UNIT)
- FLY ASH POND SYSTEM (CLOSED)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY



### MONITORING WELL LOCATION MAP

40 C.F.R. § 257 GROUNDWATER MONITORING PLAN  
 FLY ASH POND SYSTEM  
 BALDWIN POWER PLANT  
 BALDWIN, ILLINOIS

FIGURE 2-1

RAMBOLL AMERICAS  
 ENGINEERING SOLUTIONS, INC.





- COMPLIANCE MONITORING WELL
- BACKGROUND MONITORING WELL
- 40 C.F.R. § 257 REGULATED UNIT (SUBJECT UNIT)
- SITE FEATURE
- CAPPED AREA
- PROPERTY BOUNDARY

### EXPANDED 40 C.F.R. § 257 GROUNDWATER MONITORING WELL NETWORK

FIGURE 2-2

40 C.F.R. § 257 GROUNDWATER MONITORING PLAN  
 FLY ASH POND SYSTEM  
 BALDWIN POWER PLANT  
 BALDWIN, ILLINOIS

RAMBOLL AMERICAS  
 ENGINEERING SOLUTIONS, INC.

