

September 5, 2025

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

The owner or operator of a coal combustion residuals (CCR) unit must prepare a semiannual report describing the progress in selecting and designing a groundwater corrective action remedy and developing a corrective action plan.

This report is for activities occurring between March 6, 2025 and September 5, 2025 at the Fly Ash Pond System (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 a statistically significant level (SSL) for total lithium pursuant to Title 40 of the Code of Federal Regulations (40 C.F.R.) § 257.96. An SSL for lithium has not been identified at the FAPS since the determination dated January 17, 2021, associated with the Q3 2020 Assessment Monitoring sampling event, in accordance with 40 C.F.R. § 257.95. Consequently, further evaluation of total lithium for corrective action is not warranted for the FAPS.

As stated in the notification letter dated July 2, 2025, a statistically significant level (SSL) of total fluoride was identified during the assessment monitoring event completed during Quarter 1, 2025. The total fluoride SSL will be addressed in the corrective action plan being developed in accordance with Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845.670 and referenced below.

An application for an operating permit required by 35 I.A.C. § 845.230 was submitted for the FAPS to the Illinois Environmental Protection Agency (IEPA) by October 31, 2021 and is pending approval. 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/>.

Quarterly groundwater sampling for compliance in accordance with 35 I.A.C. § 845.650 was initiated at the FAPS during Quarter 2, 2023. Exceedances of groundwater protection standards established under 35 I.A.C. § 845 were determined and require corrective action through a permitting process administered by IEPA. Accordingly, a CMA was completed in accordance with 35 I.A.C. § 845.660 and submitted to IEPA on April 24, 2024.

In accordance with 40 C.F.R. § 257.97, remedy selection is to be completed as soon as feasible following completion of the CMA. 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 CMA in accordance with 35 I.A.C. § 845.660. An associated public meeting was held March 20, 2025 prior to selection of a remedy in accordance with 35 I.A.C. § 845.660(d) and a corrective action plan that meets the requirements of both 40 C.F.R. § 257 and 35 I.A.C. § 845 was submitted to IEPA on April 24, 2025. IEPA approval of the submitted corrective action plan is pending.