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Illinois Power Generating Company

Date

January 31, 2022

Project No.

1940100711-003

2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

ASH POND NO. 1
COFFEEN POWER PLANT
COFFEEN, ILLINOIS
CCR UNIT 101



2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT COFFEEN POWER PLANT ASH POND NO. 1

Project name **Coffeen Power Plant**

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Figure 1 Monitoring Well Location Map

ACRONYMS AND ABBREVIATIONS

§ Section

40 C.F.R. Title 40 of the Code of Federal Regulations

AP1 Ash Pond No. 1

ASD Alternate Source Demonstration

CCR coal combustion residuals

CMA Corrective Measures Assessment

CPP Coffeen Power Plant

GWPS groundwater protection standard

NA not applicable

No. number

NRT/OBG Natural Resource Technology, an OBG Company Ramboll Ramboll Americas Engineering Solutions, Inc.

SAP Sampling and Analysis Plan
SSI Statistically Significant Increase
SSL Statistically Significant Level

TBD to be determined

EXECUTIVE SUMMARY

This report has been prepared to provide the information required by Title 40 of the Code of Federal Regulations (40 C.F.R.) Section (§) 257.90(e) for the Ash Pond Number (No.) 1 (AP1) located at Coffeen Power Plant (CPP) near Coffeen, Illinois.

Groundwater is being monitored at AP1 in accordance with the Assessment Monitoring Program requirements specified in 40 C.F.R. § 257.95. Assessment Monitoring was initiated at AP1 on April 9, 2018.

No changes were made to the monitoring system in 2021 (no wells were installed or decommissioned).

No Statistically Significant Levels (SSLs) of 40 C.F.R. § 257 Appendix IV parameters were determined in 2021. Consequently, a Corrective Measures Assessment (CMA) is not required and AP1 remains in the Assessment Monitoring Program.

1. INTRODUCTION

This report has been prepared by Ramboll Americas Engineering Solutions, Inc. (Ramboll) on behalf of Illinois Power Generating Company, to provide the information required by 40 C.F.R. § 257.90(e) for the AP1 located at the CPP near Coffeen, Illinois.

In accordance with 40 C.F.R. § 257.90(e), the owner or operator of a coal combustion residuals (CCR) unit must prepare an Annual Groundwater Monitoring and Corrective Action Report for the preceding calendar year that documents the status of the Groundwater Monitoring and Corrective Action Program for the CCR unit, summarizes key actions completed, describes any problems encountered, discusses actions to resolve the problems, and projects key activities for the upcoming 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 §§ 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 a Statistically Significant Increase [SSI] relative to background levels).
- 5. Other information required to be included in the annual report as specified in §§ 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 §257.95.
 - ii. At the end 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 §257.95.
 - iii. If it was determined that there was a SSI over background for one or more constituents listed in Appendix III of §257 pursuant to §257.94(e):
 - A. Identify those constituents listed in Appendix III of §257 and the names of the monitoring wells associated with the SSI(s).
 - B. Provide the date when the assessment monitoring program was initiated for the CCR unit.

- iv. If it was determined that there was a SSL above the Groundwater Protection Standard [GWPS] for one or more constituents listed in Appendix IV of §257 pursuant to §257.95(g) include all of the following:
 - A. Identify those constituents listed in Appendix IV of §257 and the names of the monitoring wells associated with the SSL(s).
 - B. Provide the date when the CMA was initiated for the CCR unit.
 - C. Provide the date when the public meeting was held for CMA for the CCR unit.
 - D. Provide the date when the CMA was completed for the CCR unit.
- v. Whether a remedy was selected pursuant to §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 §257.98 during the current annual reporting period.

This report provides the required information for AP1 for calendar year 2021.

2. MONITORING AND CORRECTIVE ACTION PROGRAM STATUS

No changes have occurred to the Monitoring Program status in calendar year 2021 and AP1 remains in the Assessment Monitoring Program in accordance with 40 C.F.R. § 257.95.

3. KEY ACTIONS COMPLETED IN 2021

The Assessment Monitoring Program is summarized in **Table A** on the following page. The groundwater monitoring system, including the CCR unit and all background and compliance monitoring wells, is presented in **Figure 1**. No changes were made to the monitoring system in 2021 (no wells were installed or decommissioned). In general, one groundwater sample was collected from each background and compliance well during each monitoring event. All samples were collected and analyzed in accordance with the Sampling and Analysis Plan (SAP; Natural Resource Technology, an OBG Company [NRT/OBG], 2017a). All monitoring data obtained under 40 C.F.R. § 257.90 through 257.98 (as applicable) in 2021, and analytical results for the August 2020 sampling event, are presented in **Tables 1** to **3**. Analytical data were evaluated in accordance with the Statistical Analysis Plan (NRT/OBG, 2017b) to determine any SSLs of Appendix IV parameters over GWPSs.

Statistical background values are provided in **Table 4** and GWPSs in **Table 5**. The background values reported in **Table 4** are slightly different from those reported previously because different software was utilized to calculate these values in 2021.

Table A. 2020-2021 Assessment Monitoring Program Summary

Sampling Dates	Analytical Data Receipt Date	Parameters Collected SSL(s		SSL(s) Determination Date	ASD Completion Date
August 11-12, 2020	October 15, 2020	Appendix III			
		Appendix IV Detected ¹	None	January 13, 2021	NA
January 26-29, 2021	April 14, 2021	Appendix III			
		Appendix IV	None	July 13, 2021	NA
August 17, 2021	September 20, 2021	Appendix III			
		Appendix IV Detected ¹	None	December 19, 2021	TBD

Notes:

NA: not applicable TBD: to be determined

ASD: Alternate Source Demonstration

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¹ Groundwater sample analysis was limited to Appendix IV parameters detected during previous events in accordance with 40 C.F.R. § 257.95(d)(1).

4. PROBLEMS ENCOUNTERED AND ACTIONS TO RESOLVE THE PROBLEMS

No problems were encountered with the Groundwater Monitoring Program during 2021. Groundwater samples were collected and analyzed in accordance with the SAP and all data were accepted.

5. KEY ACTIVITIES PLANNED FOR 2022

The following key activities are planned for 2022:

- All or part of the monitoring well network that was proposed for compliance with Title 35 of the Illinois Administrative Code § 845 is under evaluation for incorporation into the current monitoring system.
- Continuation of the Assessment Monitoring Program with semi-annual sampling scheduled for the first and third guarters of 2022.
- Complete evaluation of analytical data from the compliance wells, using GWPSs to determine whether an SSL of Appendix IV parameters has occurred.
- If an SSL is identified, potential alternate sources (*i.e.*, a source other than the CCR unit caused the SSL or that the SSL resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality) will be evaluated.
 - If an alternate source is demonstrated to be the cause of the SSL, a written demonstration will be completed within 90 days of SSL determination and included in the 2022 Annual Groundwater Monitoring and Corrective Action Report.
 - If an alternate source(s) is not identified to be the cause of the SSL, the applicable requirements of 40 C.F.R. § 257.94 through 257.98 (e.g., assessment of corrective measures) as may apply in 2022 will be met, including associated recordkeeping/notifications required by 40 C.F.R. § 257.105 through 257.108.

6. REFERENCES

Natural Resource Technology, an OBG Company (NRT/OBG), 2017a. Sampling and Analysis Plan, Coffeen Ash Pond No. 1, Coffeen Power Station, Coffeen, Illinois, Project No. 2285, Revision 0. October 17, 2017.

Natural Resource Technology, an OBG Company (NRT/OBG), 2017b. *Statistical Analysis Plan, Coffeen Power Station, Newton Power Station, Illinois Power Generating Company*. October 17, 2017.

TABLE 1 **GROUNDWATER ELEVATIONS**

2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT COFFEEN POWER PLANT

101 - ASH POND NO. 1

Well ID	Well Type	Latitude (Decimal Degrees)	Longitude (Decimal Degrees)	Date	Depth to Groundwater (ft BMP)	Groundwater Elevation (ft NAVD88)	
				08/10/2020	7.10	619.26	
				01/20/2021	7.00	619.36	
				03/29/2021	4.68	621.68	
				04/20/2021	6.74	619.62	
				04/21/2021	6.59	619.77	
				05/03/2021	5.76	620.60	
G281	Background	39.06541	-89.39932	06/09/2021	6.71	619.65	
				06/14/2021	6.90	619.46	
				06/23/2021	7.65	618.71	
				07/12/2021	6.13	620.23	
				07/26/2021	6.34	620.02	
				08/16/2021	6.55	619.81	
				10/25/2021	5.52	620.84	
				08/10/2020	7.49	615.16	
				01/20/2021	6.62	616.03	
				03/29/2021	Not Me	easured	
		39.05951	-89.39541	04/20/2021	6.60	616.05	
	Compliance			05/03/2021	6.53	616.12	
				05/17/2021	6.66	615.99	
G301				06/09/2021	7.02	615.63	
				06/23/2021	7.63	615.02	
				07/12/2021	6.86	615.79	
				07/26/2021	7.34	615.31	
				08/16/2021	7.20	615.45	
				10/25/2021	5.87	616.78	
				08/10/2020	11.99	608.05	
				01/20/2021	10.05	609.99	
				03/29/2021	Not Me	ı easured	
		39.05954		04/20/2021	8.19	611.85	
				05/03/2021	7.97	612.07	
				05/17/2021	7.98	612.06	
G302	Compliance		-89.39319	06/09/2021	9.75	610.29	
				06/23/2021	11.25	608.79	
				07/12/2021	8.25	611.79	
				07/26/2021	9.06	610.98	
				08/16/2021	8.27	611.77	
				10/25/2021	6.29	613.75	
				08/10/2020	6.86	615.16	
				01/20/2021	5.85	616.17	
				03/29/2021		easured	
				04/20/2021	4.75	617.27	
G303	Compliance	39.05714	-89.39172	05/03/2021	4.00	618.02	
	Compilative	33.03/17	03.331/2	05/03/2021	4.65	617.37	
				06/09/2021	5.50	616.52	
				06/09/2021	7.10	614.92	
				07/12/2021	4.87	617.15	



GROUNDWATER ELEVATIONS

2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

COFFEEN POWER PLANT 101 - ASH POND NO. 1

COFFEEN, IL

Well ID	Well Type	Latitude (Decimal Degrees)	Longitude (Decimal Degrees)	Date	Depth to Groundwater (ft BMP)	Groundwater Elevation (ft NAVD88)
				07/26/2021	5.58	616.44
G303	Compliance	39.05714	-89.39172	08/16/2021	5.44	616.58
				10/25/2021	4.70	617.32
				08/10/2020	8.65	617.26
				01/20/2021	6.74	619.17
				03/29/2021	5.49	620.42
				04/20/2021	6.61	619.30
				04/21/2021	6.38	619.53
				05/03/2021	5.95	619.96
G306	Baakanaund	20.05640	90 20256	05/17/2021	6.47	619.44
G306	Background	39.05649	-89.39356	06/09/2021	7.87	618.04
				06/15/2021	8.62	617.29
				06/23/2021	9.59	616.32
				07/12/2021	5.32	620.59
				07/26/2021	7.07	618.84
				08/16/2021	6.99	618.92
				10/25/2021	5.85	620.06
				08/10/2020	0.24	624.36
				01/20/2021	0.50	624.10
				03/29/2021	Not Me	easured
				04/20/2021	0.10	624.50
				05/17/2021	0.15	624.45
G307	Compliance	39.05721	-89.39554	06/09/2021	Not Me	easured
				06/23/2021	Not Me	easured
				07/12/2021	0.15	624.45
				07/26/2021	Above Top	o of Casing
				08/16/2021	0.14	624.46
				10/25/2021	Not Me	easured

Notes:
ATC = above top of casing (well under pressure)
BMP = below measuring point

ft = foot/feet NAVD88 = North American Vertical Datum of 1988



TABLE 2 ANALYTICAL RESULTS - APPENDIX III PARAMETERS

2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

COFFEEN POWER PLANT

101 - ASH POND NO. 1

COFFEEN, IL

Well ID		Latitude (Decimal Degrees)	Longitude (Decimal Degrees)	Date	Boron, total (mg/L)	Calcium, total (mg/L)	Chloride, total (mg/L)	Fluoride, total (mg/L)	pH (field) (SU)	Sulfate, total (mg/L)	Total Dissolved Solids (mg/L)
				08/12/2020	0.037	130	81	0.324	6.9	260	700
G281	Background	39.06541	-89.39932	01/29/2021	<0.01	130	100	0.314	7.1	260	870
				08/17/2021	0.032	140	89	0.387	7.1	260	910
				08/11/2020	2.1	150	14	0.263	6.6	750	1200
G301	Compliance	39.05951	-89.39541	01/27/2021	2	160	17	<0.25	6.6	650	1300
				08/17/2021	2.2	150	18	0.327	6.6	810	1200
		39.05954	-89.39319	08/11/2020	1.2	140	5.9	0.28	6.9	260	780
G302	Compliance			01/27/2021	1.2	180	22	<0.25	6.6	430	1100
				08/17/2021	1.8	200	21	0.289	6.6	480	1200
		39.05714	-89.39172	08/11/2020	1.7	210	24	0.294	6.9	790	1700
G303	Compliance			01/26/2021	2	170	32	<0.25	6.8	730	1600
				08/17/2021	2.1	190	30	0.298	6.8	730	1700
		39.05649		08/11/2020	2.6	140	1.5	<0.25	6.9	250	700
G306	Background		-89.39356	01/26/2021	2.4	110	2.1	<0.25	6.8	240	700
				08/17/2021	3	110	1.5	0.257	6.5	210	640
		39.05721	-89.39554	08/11/2020	2.1	230	15	0.414	7.3	910	1200
G307	Compliance			01/27/2021	1.9	200	14	<0.25	7.4	850	1400
				08/17/2021	2.1	210	16	0.423	7.3	750	1300

Notes:

mg/L = milligrams per liter SU = Standard Units



< = concentration is less than the concentration shown, which corresponds to the reporting limit for the method; estimated concentrations below the reporting limit and associated qualifiers are not provided since they are not utilized in statistics to determine Statistically Significant Increases (SSIs) over background

ANALYTICAL RESULTS - APPENDIX IV PARAMETERS

2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

COFFEEN POWER PLANT

101 - ASH POND NO. 1

COFFEEN, IL

Well ID	Well Type	Latitude (Decimal Degrees)	Longitude (Decimal Degrees)	Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Cadmium, total (mg/L)	Chromium, total (mg/L)	Cobalt, total (mg/L)	Fluoride, total (mg/L)	Lead, total (mg/L)	Lithium, total (mg/L)	Mercury, total (mg/L)	Molybdenum, total (mg/L)	Radium 226+228, total (pCi/L)	Selenium, total (mg/L)	Thallium, total (mg/L)
				08/12/2020		<0.001	0.057	<0.001	<0.001	<0.004	<0.002	0.324	<0.001	<0.02	<0.0002	<0.001	0.304	<0.001	
G281	Background	39.06541	-89.39932	01/29/2021	<0.003	<0.001	0.064	<0.001	<0.001	<0.004	<0.002	0.314	<0.001	<0.02	<0.0002	<0.001	0.397	<0.001	<0.001
				08/17/2021	<0.003	<0.001	0.065	<0.001	<0.001	<0.004	<0.002	0.387	<0.001	<0.02	<0.0002	<0.001	0.468	<0.001	<0.001
				08/11/2020		<0.001	0.016	<0.001	<0.001	<0.004	<0.002	0.263	<0.001	<0.02		<0.001	0.781	<0.001	
G301	Compliance	39.05951	-89.39541	01/27/2021	<0.003	<0.001	0.017	<0.001	<0.001	<0.004	<0.002	<0.25	<0.001	<0.02	<0.0002	<0.001	1.02	<0.001	<0.001
				08/17/2021		<0.001	0.016	<0.001	<0.001	<0.004	<0.002	0.327	<0.001	<0.02		<0.001	0.0854	<0.001	
				08/11/2020		0.001	0.022	<0.001	<0.001	<0.004	<0.002	0.28	<0.001	<0.02		<0.001	0.652	<0.001	
G302	Compliance	39.05954	-89.39319	01/27/2021	<0.003	<0.001	0.027	<0.001	<0.001	<0.004	<0.002	<0.25	<0.001	<0.02	<0.0002	<0.001	0.129	<0.001	<0.001
				08/17/2021		<0.001	0.029	<0.001	<0.001	<0.004	<0.002	0.289	<0.001	<0.02		<0.001	1.26	<0.001	
				08/11/2020		0.0041	0.033	<0.001	<0.001	0.0043	0.0056	0.294	0.0037	0.041		0.0023	1.37	<0.001	
G303	Compliance	39.05714	-89.39172	01/26/2021	<0.003	<0.001	0.013	<0.001	<0.001	<0.004	<0.002	<0.25	<0.001	0.033	<0.0002	0.0016	0.355	<0.001	<0.001
				08/17/2021		0.003	0.017	<0.001	<0.001	<0.004	0.0044	0.298	<0.001	0.032		0.0018	0.689	<0.001	
				08/11/2020		<0.001	0.039	<0.001	<0.001	<0.004	<0.002	<0.25	<0.001	<0.02		<0.001	0.145	<0.001	
G306	Background	39.05649	-89.39356	01/26/2021	<0.003	<0.001	0.03	<0.001	<0.001	<0.004	<0.002	<0.25	<0.001	<0.02	<0.0002	<0.001	0.876	0.0012	<0.001
				08/17/2021		<0.001	0.03	<0.001	<0.001	<0.004	<0.002	0.257	<0.001	<0.02		<0.001	0.811	<0.001	
				08/11/2020		<0.001	0.021	<0.001	<0.001	<0.004	0.0024	0.414	<0.001	<0.02		0.0013	0.593	<0.001	
G307	Compliance	39.05721	-89.39554	01/27/2021	<0.003	<0.001	0.02	<0.001	<0.001	<0.004	0.0024	<0.25	<0.001	<0.02	<0.0002	0.0012	0.616	<0.001	<0.001
				08/17/2021		<0.001	0.03	<0.001	0.0047	<0.004	0.0032	0.423	0.001	<0.02		0.0012	1.42	<0.001	

Notes:

mg/L = milligrams per liter

pCi/L = picoCuries per liter

c = concentration is less than the concentration shown, which corresponds to the reporting limit for the method; estimated concentrations below the reporting limit and associated qualifiers are not provided since they are not utilized in statistics to determine Statistically Significant Levels (SSLs) over the groundwater protection standard.

-- = not analyzed



STATISTICAL BACKGROUND VALUES
2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT COFFEEN POWER PLANT

101 - ASH POND NO. 1

COFFEEN, IL

Parameter	Statistical Background Value (LPL/UPL)
40 C.F.R. Part	257 Appendix III
Boron (mg/L)	2.90
Calcium (mg/L)	150
Chloride (mg/L)	75.0
Fluoride (mg/L)	0.470
pH (field) (SU)	6.5/7.1
Sulfate (mg/L)	700
Total Dissolved Solids (mg/L)	893

Notes:

40 C.F.R. = Title 40 of the Code of Federal Regulations
LPL = Lower Prediction Limit (applicable for pH only)
mg/L = milligrams per liter
SU = Standard Units
UPL = Upper Prediction Limit



GROUNDWATER PROTECTION STANDARDS

2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT COFFEEN POWER PLANT

101 - ASH POND NO. 1

COFFEEN, IL

Parameter	Groundwater Protection Standard*						
40 C.F.R. Par	t 257 Appendix IV						
Antimony (mg/L)	0.006						
Arsenic (mg/L)	0.010						
Barium (mg/L)	2						
Beryllium (mg/L)	0.004						
Cadmium (mg/L)	0.005						
Chromium (mg/L)	0.1						
Cobalt (mg/L)	0.0064						
Fluoride (mg/L)	4.0						
Lead (mg/L)	0.015						
Lithium (mg/L)	0.04						
Mercury (mg/L)	0.002						
Molybdenum (mg/L)	0.1						
Radium-226 + Radium 228 (pCi/L)	5						
Selenium (mg/L)	0.05						
Thallium (mg/L)	0.002						



Notes:

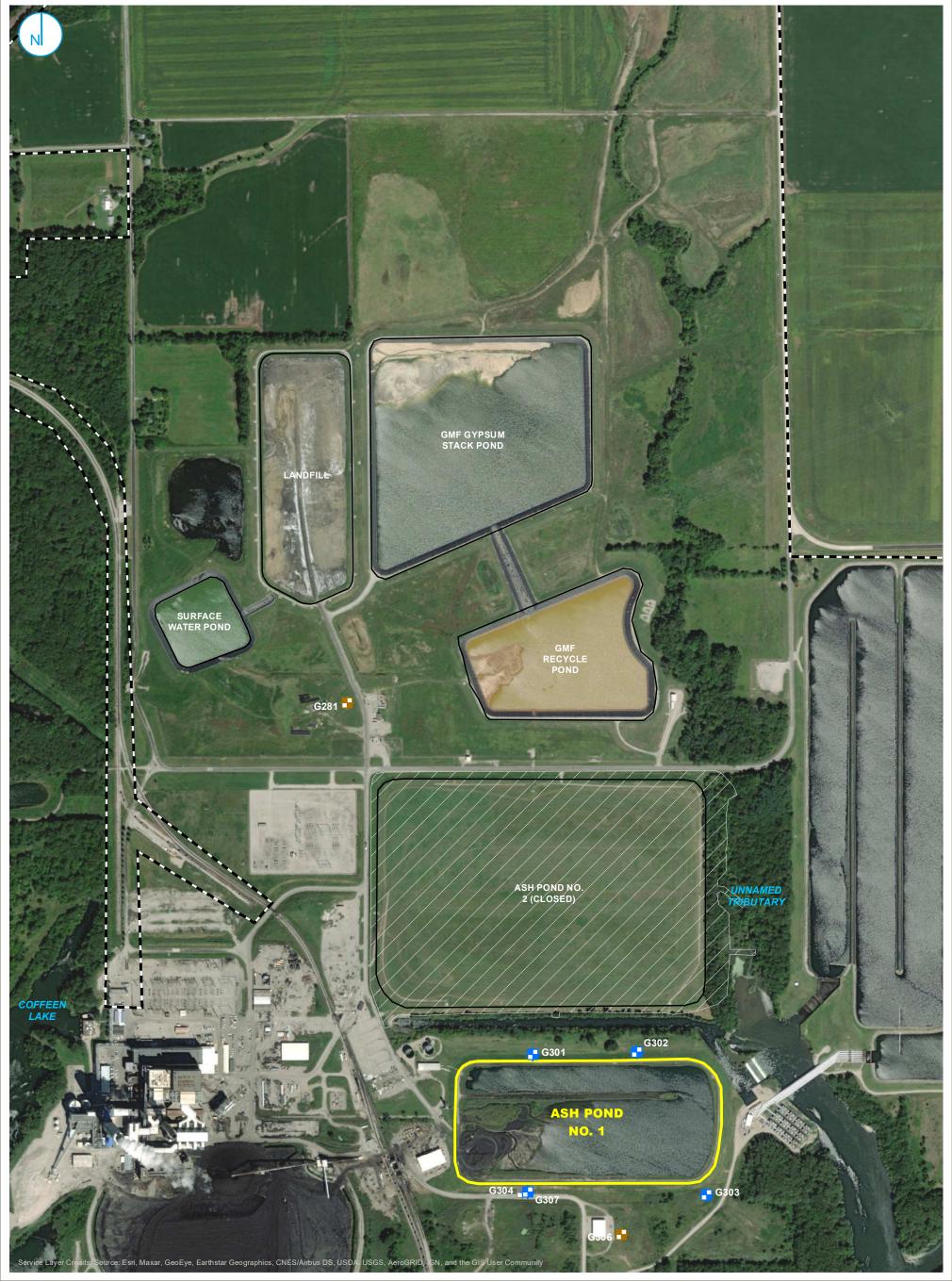
* Groundwater Protection Standard is the higher of the Maximum Contaminant Level/Health-Based Level or background.

40 C.F.R. = Title 40 of the Code of Federal Regulations

mg/L = milligrams per liter

pCi/L = picoCuries per liter

FIGURES



BACKGROUND WELL

COMPLIANCE WELL

CLOSED MONITORING WELL

PART 257 REGULATED UNIT (SUBJECT UNIT)

SITE FEATURE

CAPPED AREA (IEPA APPROVED CLOSURE)

PROPERTY BOUNDARY

MONITORING WELL LOCATION MAP

2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT ASH POND NO. 1 COFFEEN POWER PLANT

COFFEEN, ILLINOIS

FIGURE 1

RAMBOLL AMERICAS ENGINEERING SOLUTIONS, INC.

