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**Illinois Power Generating Company**

Date  
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Project No.  
**1940100711-003**

# **2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT**

## **GMF RECYCLE POND COFFEEN POWER PLANT COFFEEN, ILLINOIS CCR UNIT 104**

**2021 ANNUAL GROUNDWATER MONITORING AND  
CORRECTIVE ACTION REPORT  
COFFEEN POWER PLANT GYPSUM MANAGEMENT FACILITY  
RECYCLE POND**

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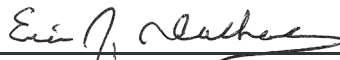
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## ACRONYMS AND ABBREVIATIONS

§	Section
40 C.F.R.	Title 40 of the Code of Federal Regulations
ASD	Alternate Source Demonstration
CCR	coal combustion residuals
CMA	Corrective Measures Assessment
CPP	Coffeen Power Plant
GMF RP	Gypsum Management Facility Recycle Pond
GWPS	groundwater protection standard
NA	not applicable
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 Gypsum Management Facility Recycle Pond (GMF RP) located at Coffeen Power Plant (CPP) near Coffeen, Illinois.

Groundwater is being monitored at the GMF RP in accordance with the Assessment Monitoring Program requirements specified in 40 C.F.R. § 257.95. Assessment Monitoring was initiated at the GMF RP 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. Consequently, a Corrective Measures Assessment (CMA) is not required and the GMF RP 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 GMF RP 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 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 the GMF RP 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 the GMF RP 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. 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 - 13, 2020	October 15, 2020	Appendix III Appendix IV Detected <sup>1</sup>	None	January 13, 2021	NA
January 21 - February 1, 2021 June 28, 2021 (G276 only)	April 14, 2021	Appendix III Appendix IV	None	July 13, 2021	NA
August 18, 2021	September 20, 2021	Appendix III Appendix IV Detected <sup>1</sup>	None	December 19, 2021	NA

**Notes:**

ASD: Alternate Source Demonstration

TBD: to be determined

<sup>1</sup> 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 (NRT/OBG, 2017a), 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 quarters 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 GMF Recycle Pond, 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.

## TABLES

**TABLE 1**  
**GROUNDWATER ELEVATIONS**  
2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT  
COFFEEN POWER PLANT  
104 - GMF RECYCLE POND  
COFFEEN, IL

Well ID	Well Type	Latitude (Decimal Degrees)	Longitude (Decimal Degrees)	Date	Depth to Groundwater (ft BMP)	Groundwater Elevation (ft NAVD88)
G270	Background	39.06656	-89.39740	08/10/2020	7.81	618.11
				01/20/2021	3.35	622.51
				03/29/2021	2.48	623.38
				04/20/2021	3.12	622.74
				05/03/2021	2.78	623.08
				05/17/2021	2.99	622.87
				06/09/2021	4.11	621.75
				06/23/2021	6.80	619.06
				07/12/2021	3.30	622.56
				07/26/2021	3.47	622.39
				08/16/2021	3.32	622.54
				10/25/2021	2.76	623.10
G271	Compliance	39.06501	-89.39559	08/10/2020	11.39	614.18
				01/20/2021	11.66	613.91
				03/29/2021	Not Measured	
				04/20/2021	10.06	615.51
				05/03/2021	9.61	615.96
				05/17/2021	9.79	615.78
				06/09/2021	10.05	615.52
				06/23/2021	10.55	615.02
				07/12/2021	10.00	615.57
				07/26/2021	9.90	615.67
				08/16/2021	9.79	615.78
				10/25/2021	9.86	615.71
G273	Compliance	39.06499	-89.39397	08/10/2020	11.50	611.52
				01/20/2021	11.50	611.52
				03/29/2021	Not Measured	
				04/20/2021	10.60	612.42
				05/03/2021	10.12	612.90
				05/17/2021	10.39	612.63
				06/09/2021	10.78	612.24
				06/23/2021	11.23	611.79
				07/12/2021	10.80	612.22
				07/26/2021	10.67	612.35
				08/16/2021	9.50	613.52
				10/25/2021	10.86	612.16
G276	Compliance	39.06553	-89.39262	08/10/2020	27.37	604.63
				01/20/2021	28.29	603.71
				03/29/2021	Not Measured	
				04/20/2021	27.35	604.65
				05/03/2021	27.29	604.71
				05/17/2021	27.12	604.88
				06/09/2021	27.07	604.93
				06/23/2021	27.47	604.53
				07/12/2021	27.45	604.55
				07/26/2021	27.32	604.68

**TABLE 1**  
**GROUNDWATER ELEVATIONS**  
2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT  
COFFEEN POWER PLANT  
104 - GMF RECYCLE POND  
COFFEEN, IL

Well ID	Well Type	Latitude (Decimal Degrees)	Longitude (Decimal Degrees)	Date	Depth to Groundwater (ft BMP)	Groundwater Elevation (ft NAVD88)
G276	Compliance	39.06553	-89.39262	08/16/2021	27.27	604.73
				10/25/2021	27.60	604.40
G279	Compliance	39.06716	-89.39300	08/10/2020	24.87	607.17
				01/20/2021	24.97	607.07
				03/29/2021	Not Measured	
				04/20/2021	23.07	608.97
				05/03/2021	22.66	609.38
				05/17/2021	22.82	609.22
				06/09/2021	32.35	599.69
				06/23/2021	24.30	607.74
				07/12/2021	23.86	608.18
				07/26/2021	23.47	608.57
				08/16/2021	23.09	608.95
				10/25/2021	23.02	609.02
G280	Background	39.06722	-89.39499	08/10/2020	6.35	619.50
				01/20/2021	7.15	618.20
				03/29/2021	4.74	620.61
				04/20/2021	5.59	619.76
				05/03/2021	5.14	620.21
				05/17/2021	5.37	619.98
				06/09/2021	5.60	619.75
				06/23/2021	6.42	618.93
				07/12/2021	6.09	619.26
				07/26/2021	5.60	619.75
				08/16/2021	5.35	620.00
				10/25/2021	4.82	620.53

**Notes:**  
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  
 104 - GMF RECYCLE POND  
 COFFEEN, IL

Well ID	Well Type	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)
G270	Background	39.06656	-89.39740	08/12/2020	0.1	58	12	0.349	7.1	53	380
				01/21/2021	<0.01	59	10	0.386	7.1	54	360
				08/18/2021	0.012	55	12	0.409	7.1	54	470
G271	Compliance	39.06501	-89.39559	08/13/2020	2.4	150	44	0.385	7.2	470	900
				02/01/2021	2.1	150	60	<0.25	7.2	420	980
				08/18/2021	1.3	100	49	0.47	7.2	370	870
G273	Compliance	39.06499	-89.39397	08/13/2020	0.064	150	64	0.34	7.0	410	890
				02/01/2021	0.15	160	82	<0.25	6.9	490	1200
				08/18/2021	0.066	150	66	0.429	7.2	440	1200
G276	Compliance	39.06553	-89.39262	08/12/2020	0.041	140	23	0.396	6.9	280	820
				06/28/2021	0.022	140	29	0.355	7.1	270	900
				08/18/2021	0.023	140	22	0.451	7.1	270	900
G279	Compliance	39.06716	-89.39300	08/12/2020	1.4	480	410	0.313	6.8	1600	3000
				01/28/2021	0.016	100	5.8	0.524	7.0	190	650
				08/18/2021	0.066	360	270	0.656	6.9	110	2800
G280	Background	39.06722	-89.39499	08/11/2020	0.52	220	68	0.289	7.3	86	440
				01/28/2021	<0.01	73	64	0.368	7.3	86	430
				08/18/2021	0.028	69	59	0.444	7.1	74	460

**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

**TABLE 3**  
**ANALYTICAL RESULTS - APPENDIX IV PARAMETERS**  
2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT  
COFFEEN POWER PLANT  
104 - GMF RECYCLE POND  
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)
G270	Background	39.06656	-89.39740	08/12/2020	--	<0.001	0.042	<0.001	<0.001	<0.004	<0.002	0.349	<0.001	<0.02	<0.0002	<0.001	0.248	<0.001	<0.001
				01/21/2021	<0.003	<0.001	0.039	<0.001	<0.001	<0.004	<0.002	0.386	<0.001	<0.02	<0.0002	<0.001	0.249	<0.001	<0.001
				08/18/2021	<0.003	<0.001	0.034	<0.001	<0.001	<0.004	<0.002	0.409	<0.001	<0.02	<0.0002	<0.001	0	<0.001	<0.001
G271	Compliance	39.06501	-89.39559	08/13/2020	--	<0.001	0.025	--	--	<0.004	<0.002	0.385	<0.001	<0.02	--	<0.001	0.338	<0.001	<0.001
				02/01/2021	<0.003	<0.001	0.021	<0.001	<0.001	<0.004	<0.002	<0.25	0.0016	<0.02	<0.0002	<0.001	0.164	0.0015	<0.001
				08/18/2021	<0.003	<0.001	0.019	<0.001	<0.001	<0.004	<0.002	0.47	<0.001	<0.02	<0.0002	<0.001	0.208	0.0015	<0.001
G273	Compliance	39.06499	-89.39397	08/13/2020	--	<0.001	0.027	--	--	<0.004	<0.002	0.34	<0.001	<0.02	--	<0.001	0.232	<0.001	<0.001
				02/01/2021	<0.003	<0.001	0.029	<0.001	<0.001	<0.004	<0.002	<0.25	<0.001	<0.02	<0.0002	<0.001	0.406	<0.001	<0.001
				08/18/2021	<0.003	<0.001	0.028	<0.001	<0.001	<0.004	<0.002	0.429	<0.001	<0.02	<0.0002	<0.001	0.135	<0.001	<0.001
G276	Compliance	39.06553	-89.39262	08/12/2020	--	<0.001	0.053	--	--	<0.004	<0.002	0.396	<0.001	<0.02	--	<0.001	0.497	0.0019	<0.001
				06/28/2021	<0.003	<0.001	0.05	<0.001	<0.001	<0.004	<0.002	0.355	<0.001	<0.02	<0.0002	<0.001	1.02	0.0014	<0.001
				08/18/2021	<0.003	<0.001	0.046	<0.001	<0.001	<0.004	<0.002	0.451	<0.001	<0.02	<0.0002	<0.001	4.21	0.0015	<0.001
G279	Compliance	39.06716	-89.39300	08/12/2020	--	<0.001	0.032	--	--	<0.004	<0.002	0.313	<0.001	<0.02	--	<0.001	0.914	0.0094	<0.001
				01/28/2021	<0.003	<0.001	0.043	<0.001	<0.001	<0.004	<0.002	0.524	<0.001	<0.02	<0.0002	<0.001	0.16	0.0025	<0.001
				08/18/2021	<0.003	<0.001	0.038	<0.001	<0.001	<0.004	<0.002	0.656	<0.001	<0.02	<0.0002	<0.001	0.253	0.0042	<0.001
G280	Background	39.06722	-89.39499	08/11/2020	--	0.0034	0.21	--	--	0.015	0.006	0.289	0.0054	0.03	--	0.0023	0.472	<0.001	<0.001
				01/28/2021	<0.003	<0.001	0.043	<0.001	<0.001	<0.004	<0.002	0.368	<0.001	<0.02	<0.0002	<0.001	0.0142	<0.001	<0.001
				08/18/2021	<0.003	<0.001	0.046	<0.001	<0.001	<0.004	<0.002	0.444	<0.001	<0.02	<0.0002	0.0016	1.48	<0.001	<0.001

**Notes:**  
mg/L = milligrams per liter  
pCi/L = picoCuries per liter  
< = 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



**TABLE 4**  
**STATISTICAL BACKGROUND VALUES**  
2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT  
COFFEEN POWER PLANT  
104 - GMF RECYCLE POND  
COFFEEN, IL

Parameter	Statistical Background Value (LPL/UPL)
40 C.F.R. Part 257 Appendix III	
Boron (mg/L)	0.029
Calcium (mg/L)	120
Chloride (mg/L)	54.0
Fluoride (mg/L)	0.500
pH (field) (SU)	6.6/7.5
Sulfate (mg/L)	104
Total Dissolved Solids (mg/L)	476

**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

**TABLE 5**  
**GROUNDWATER PROTECTION STANDARDS**  
2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT  
COFFEEN POWER PLANT  
104 - GMF RECYCLE POND  
COFFEEN, IL

Parameter	Groundwater Protection Standard*
40 C.F.R. Part 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)	0.006
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





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

- BACKGROUND WELL
- COMPLIANCE WELL
- PART 257 REGULATED UNIT (SUBJECT UNIT)
- SITE FEATURE
- CAPPED AREA (IEPA APPROVED CLOSURE)
- PROPERTY BOUNDARY

MONITORING WELL LOCATION MAP

FIGURE 1

0 275 550 Feet

2021 ANNUAL GROUNDWATER MONITORING  
AND CORRECTIVE ACTION REPORT  
GMF GYPSUM RECYCLE POND  
COFFEEN POWER PLANT  
COFFEEN, ILLINOIS

RAMBOLL AMERICAS  
ENGINEERING SOLUTIONS, INC.

