

March 28, 2023

Re: Bottom Ash Basin, Duck Creek Power Plant, Canton, Illinois – Update to 40 C.F.R. § 257 Compliance Groundwater Monitoring Program to Align with Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845 Compliance Groundwater Monitoring Program

Illinois Power Resources Generating, LLC (IPRG) is providing the U.S. Environmental Protection Agency ("EPA") with this update to the Groundwater Monitoring Plan (GMP) associated with the Bottom Ash Basin (BAB) at the Duck Creek Power Plant, located near Canton, Illinois. This revised 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). Certification of the monitoring system at the BAB is included in the GMP. IPRG has also prepared a revised Statistical Analysis Plan and corresponding statistical method certification in accordance with the requirements of 40 C.F.R. § 257.93(f)(6), and two additional documents - Quality Assurance Project Plan (QAPP) and Sampling and Analysis Plan (SAP) – to meet the requirements of both 40 C.F.R. § 257 and 35 I.A.C. § 845 and provide conformity between the two programs.

Accordingly, along with this letter, we are posting the GMP under 40 C.F.R. § 257.91 and the Statistical Analysis Plan certifications under 40 C.F.R. § 257.93 to Luminant's public CCR website: www.luminant.com/ccr/. The updated Statistical Analysis Plan along with the QAPP and SAP have been placed in the facility's operating record. A Hydrogeologic Site Characterization Report developed to meet the requirements of 35 I.A.C. § 845 has also been placed in the facility's operating record.

Sincerely,

Dianna Sickner

Dianna Tickner Sr. Director Decommissioning & Demolition