

**40 C.F.R. § 257.91(F) GROUNDWATER MONITORING SYSTEM  
CERTIFICATION  
GMF POND  
DUCK CREEK POWER PLANT**

In accordance with Title 40 of the Code of Federal Regulations (40 C.F.R.), Part 257, Subpart D, § 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 Duck Creek Power Plant (DCPP) Gypsum Management Facility (GMF) Pond 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 DCPD GMF Pond.

*I, Eric J. Tlachac, a qualified professional engineer in good standing in the State of Illinois, certify that the groundwater monitoring system at the DCPD GMF Pond 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 31, 2025



*I, Brian G. Hennings, a qualified professional geologist in good standing in the State of Illinois, certify that the groundwater monitoring system at the DCPD GMF Pond 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 31, 2025

