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Luminant
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March 7, 2023

Mr. Richard Huggins
Energy Recovery and Waste Disposal Branch
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Ash Pond, Edwards Power Plant, Bartonville 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

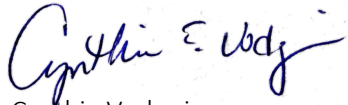
Dear Mr. Huggins:

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 Ash Pond at the Edwards Power Plant (EPP), located near Bartonville, 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 EPP 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 EPP’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 BPP’s operating record. This submission should be included by EPA as an update to the administrative record for the alternative closure demonstration that is currently pending for the Edwards Power Plant.

An electronic PDF of this letter is being submitted to Richard Huggins, Frank Behan and Lydia Anderson via email. If you have any questions regarding this submittal, please contact me or Phil Morris at 618-343-7794 or phil.morris@vistracorp.com.

Sincerely,

A handwritten signature in black ink that reads "Cynthia E. Vodopivec". The signature is written in a cursive style with a large initial 'C' and a distinct 'E'.

Cynthia Vodopivec

SVP – Environmental, Health & Safety