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Dynegy Midwest Generation, LLC

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2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT

EAST ASH POND HENNEPIN POWER PLANT HENNEPIN, ILLINOIS CCR UNIT 803

**2021 ANNUAL GROUNDWATER MONITORING AND
CORRECTIVE ACTION REPORT
HENNEPIN POWER PLANT EAST ASH POND**

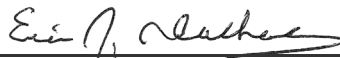
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Prepared by **Chase J. Christenson, PG**
Checked by **Lauren Cook**
Approved by **Eric J. Tlachac**
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Ramboll
234 W. Florida Street
Fifth Floor
Milwaukee, WI 53204
USA

T 414-837-3607
F 414-837-3608
<https://ramboll.com>



Chase J. Christenson, PG
Hydrogeologist



Eric J. Tlachac, PE
Senior Managing Engineer

CONTENTS

EXECUTIVE SUMMARY	3
1. Introduction	4
2. Monitoring and Corrective Action Program Status	6
3. Key Actions Completed in 2021	7
4. Problems Encountered and Actions to Resolve the Problems	9
5. Key Activities Planned for 2022	10
6. References	11

TABLES (IN TEXT)

Table A	2020-2021 Assessment Monitoring Program Summary
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TABLES (ATTACHED)

Table 1	Groundwater Elevations
Table 2	Analytical Results - Appendix III Parameters
Table 3	Analytical Results - Appendix IV Parameters
Table 4	Statistical Background Values
Table 5	Groundwater Protection Standards

FIGURES (ATTACHED)

Figure 1	Monitoring Well Location Map
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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
EAP	East Ash Pond
GWPS	groundwater protection standard
HPP	Hennepin Power Plant
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 East Ash Pond (EAP) located at Hennepin Power Plant (HPP) near Hennepin, Illinois.

Groundwater is being monitored at the EAP in accordance with the Assessment Monitoring Program requirements specified in 40 C.F.R. § 257.95. Assessment Monitoring was initiated at the EAP 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. Part § Appendix IV parameters were determined. Consequently, a Corrective Measures Assessment (CMA) is not required and the EAP remains in the Assessment Monitoring Program.

1. INTRODUCTION

This report has been prepared by Ramboll Americas Engineering Solutions, Inc. (Ramboll) on behalf of Dynegy Midwest Generation, LLC, to provide the information required by 40 C.F.R. § 257.90(e) for the EAP located at the HPP near Hennepin, 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 the EAP 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 EAP 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 September 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
September 2 - 3, 2020	October 16, 2020	Appendix III Appendix IV Detected ¹	none	January 14, 2021	NA
March 18, 2021	April 14, 2021	Appendix III Appendix IV	none	July 13, 2021	NA
September 9 - 22, 2021	October 15, 2021	Appendix III Appendix IV Detected ¹	TBD	TBD	TBD

Notes:

ASD: Alternate Source Demonstration

NA: not applicable

TBD: to be determined

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 (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, Hennepin East Ash Pond, Hennepin Power Station, Hennepin, Illinois, Project No. 2285, Revision 0, October 17, 2017.

Natural Resource Technology, an OBG Company (NRT/OBG), 2017b. Statistical Analysis Plan, Baldwin Energy Complex, Havana Power Station, Hennepin Power Station, Wood River Power Station, Dynegy Midwest Generation, LLC, October 17, 2017.

TABLES

TABLE 1
GROUNDWATER ELEVATIONS
 2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT
 HENNEPIN POWER PLANT
 803 - EAST ASH POND
 HENNEPIN, IL

Well ID	Well Type	Latitude (Decimal Degrees)	Longitude (Decimal Degrees)	Date	Depth to Groundwater (ft BMP)	Groundwater Elevation (ft NAVD88)
07	Background	41.29799	-89.30571	09/02/2020	64.90	453.37
				12/09/2020	67.20	451.07
				02/24/2021	68.73	449.54
				03/18/2021	68.18	450.09
				04/07/2021	68.12	450.15
				05/05/2021	62.67	455.60
				06/08/2021	66.72	451.55
				06/24/2021	66.78	451.49
				07/13/2021	65.45	452.82
				08/03/2021	65.66	452.61
				09/08/2021	67.02	451.25
				12/07/2021	67.21	451.06
08	Background	41.30070	-89.30440	09/02/2020	51.69	449.69
				12/09/2020	53.86	447.52
				02/24/2021	54.97	446.41
				03/18/2021	53.88	447.50
				04/07/2021	53.61	447.77
				05/06/2021	52.29	449.09
				06/08/2021	52.40	448.98
				06/24/2021	52.12	449.26
				07/13/2021	49.90	451.48
				08/03/2021	51.71	449.67
				09/08/2021	53.08	448.30
				12/07/2021	53.64	447.74
08D	Background	41.30080	-89.30452	09/02/2020	51.62	449.72
				12/09/2020	54.12	447.22
				02/24/2021	55.13	446.21
				03/18/2021	54.00	447.34
				04/07/2021	53.78	447.56
				05/06/2021	52.28	449.06
				06/08/2021	52.59	448.75
				06/24/2021	52.03	449.31
				07/13/2021	49.90	451.44
				08/03/2021	51.92	449.42
				09/08/2021	53.80	447.54
				12/07/2021	53.92	447.42
12	Compliance	41.30366	-89.30430	09/02/2020	49.02	449.42
				12/09/2020	51.20	447.24
				02/24/2021	Dry	
				03/22/2021	51.06	447.38
				04/07/2021	50.84	447.60
				05/05/2021	49.66	448.78
				06/08/2021	49.76	448.68
				06/23/2021	49.29	449.15
				07/13/2021	47.10	451.34
				08/03/2021	49.09	449.35

TABLE 1
GROUNDWATER ELEVATIONS
2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT
HENNEPIN POWER PLANT
803 - EAST ASH POND
HENNEPIN, IL

Well ID	Well Type	Latitude (Decimal Degrees)	Longitude (Decimal Degrees)	Date	Depth to Groundwater (ft BMP)	Groundwater Elevation (ft NAVD88)
12	Compliance	41.30366	-89.30430	09/08/2021	50.34	448.10
				12/07/2021	51.00	447.44
13	Compliance	41.30366	-89.30432	09/02/2020	49.00	449.47
				12/09/2020	51.19	447.28
				02/24/2021	52.19	446.28
				03/22/2021	51.00	447.47
				04/07/2021	50.86	447.61
				05/05/2021	49.70	448.77
				06/08/2021	49.78	448.69
				06/23/2021	49.29	449.18
				07/13/2021	47.12	451.35
				08/03/2021	49.14	449.33
				09/08/2021	50.34	448.13
				12/07/2021	50.97	447.50
46	Compliance	41.30395	-89.30347	09/02/2020	49.22	449.53
				12/09/2020	51.94	446.81
				02/24/2021	Not Measured	
				03/22/2021	51.34	447.41
				04/07/2021	51.10	447.65
				05/05/2021	49.86	448.89
				06/08/2021	49.96	448.79
				06/23/2021	49.55	449.20
				07/13/2021	47.30	451.45
				08/03/2021	49.23	449.52
				09/08/2021	50.53	448.22
				12/07/2021	51.20	447.55
47	Compliance	41.30330	-89.30599	09/02/2020	53.50	449.15
				12/09/2020	55.83	446.82
				02/24/2021	56.58	446.07
				03/18/2021	55.68	446.97
				04/07/2021	55.30	447.35
				05/05/2021	54.12	448.53
				06/08/2021	54.18	448.47
				06/23/2021	52.23	450.42
				07/13/2021	51.55	451.10
				08/03/2021	53.55	449.10
				09/08/2021	54.83	447.82
				12/07/2021	55.43	447.22

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
 HENNEPIN POWER PLANT
 803 - EAST ASH POND
 HENNEPIN, 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)
07	Background	41.29799	-89.30571	09/03/2020	0.0811	146	38	0.1	6.8	67	606
				03/18/2021	0.0714	135	58	0.11	6.9	78	712
				09/09/2021	0.0764	156	70	0.11	6.7	52	654
08	Background	41.30070	-89.30440	09/03/2020	0.119	202	168	<0.1	6.7	154	1010
				03/18/2021	0.124	215	273	<0.1	6.7	128	1200
				09/09/2021	0.111	188	152	<0.1	6.6	100	876
08D	Background	41.30080	-89.30452	09/03/2020	0.0942	226	222	0.11	6.7	213	1200
				03/18/2021	0.106	224	243	0.1	6.7	199	1250
				09/09/2021	0.0965	216	250	0.1	6.6	123	1090
				09/22/2021	--	--	--	--	6.6	--	--
12	Compliance	41.30366	-89.30430	09/02/2020	0.402	76.2	57	0.3	7.4	61	432
				03/18/2021	0.454	91.9	77	0.25	7.2	74	540
				09/09/2021	0.224	85.9	65	0.25	7.3	62	422
				09/22/2021	--	--	--	--	7.2	--	--
13	Compliance	41.30366	-89.30432	09/02/2020	1	71.4	64	0.24	7.5	81	456
				03/18/2021	1.12	85	79	0.24	7.4	96	552
				09/09/2021	0.345	78.7	65	0.22	7.4	61	434
46	Compliance	41.30395	-89.30347	09/03/2020	0.289	77.7	58	0.27	7.0	58	436
				03/18/2021	0.254	80.7	69	0.26	7.3	63	486
				09/09/2021	0.192	84.8	75	0.25	7.2	66	434
47	Compliance	41.30330	-89.30599	09/02/2020	0.158	94.1	69	0.29	7.1	51	478
				03/18/2021	0.15	98.1	85	0.27	7.2	66	548
				09/09/2021	0.239	102	84	0.28	7.0	62	476

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
 -- = not analyzed

TABLE 3
ANALYTICAL RESULTS - APPENDIX IV PARAMETERS
2021 ANNUAL GROUNDWATER MONITORING AND CORRECTIVE ACTION REPORT
HENNEPIN POWER PLANT
803 - EAST ASH POND
HENNEPIN, 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)
07	Background	41.29799	-89.30571	09/03/2020	<0.001	<0.001	0.117	<0.001	<0.001	<0.0015	<0.001	0.1	<0.001	0.0086	<0.0002	<0.0015	0.49	<0.001	<0.002
				03/18/2021	<0.001	<0.001	0.133	<0.001	<0.001	<0.0015	0.129	0.11	<0.001	0.0107	<0.0002	<0.0015	1.21	<0.001	<0.002
				09/09/2021	<0.001	<0.001	0.131	<0.001	<0.001	<0.0015	0.0164	0.11	<0.001	0.01	<0.0002	<0.0015	1.14	<0.001	<0.002
08	Background	41.30070	-89.30440	09/03/2020	<0.001	<0.001	0.0918	<0.001	<0.001	<0.0015	0.0047	<0.1	<0.001	0.0116	<0.0002	<0.0015	0.88	<0.001	<0.002
				03/18/2021	<0.001	<0.001	0.0969	<0.001	<0.001	<0.0015	0.0045	<0.1	<0.001	0.013	<0.0002	<0.0015	0.54	<0.001	<0.002
				09/09/2021	<0.001	<0.001	0.0878	<0.001	<0.001	<0.0015	0.0049	<0.1	<0.001	0.013	<0.0002	<0.0015	0.295	<0.001	<0.002
08D	Background	41.30080	-89.30452	09/03/2020	<0.001	<0.001	0.131	<0.001	<0.001	<0.0015	0.0042	0.11	<0.001	0.013	<0.0002	<0.0015	0.55	<0.001	<0.002
				03/18/2021	<0.001	<0.001	0.128	<0.001	<0.001	<0.0015	0.0028	0.1	<0.001	0.0141	<0.0002	<0.0015	1.67	<0.001	<0.002
				09/09/2021	<0.001	<0.001	0.122	<0.001	<0.001	<0.0015	0.0032	0.1	<0.001	0.0137	<0.0002	<0.0015	--	<0.001	<0.002
				09/22/2021	--	--	--	--	--	--	--	--	--	--	--	--	1.67	--	--
12	Compliance	41.30366	-89.30430	09/02/2020	--	--	0.0609	--	--	--	--	0.3	--	0.0126	--	0.0322	0.63	<0.001	--
				03/18/2021	<0.001	<0.001	0.0806	<0.001	<0.001	<0.0015	<0.001	0.25	<0.001	0.0124	<0.0002	0.0254	0.231	0.0011	<0.002
				09/09/2021	--	<0.001	0.0556	--	<0.001	<0.0015	<0.001	0.25	<0.001	0.0121	--	0.026	--	<0.001	--
				09/22/2021	--	--	--	--	--	--	--	--	--	--	--	--	0.759	--	--
13	Compliance	41.30366	-89.30432	09/02/2020	--	--	0.0422	--	--	--	--	0.24	--	0.0207	--	0.0198	0.94	0.0019	--
				03/18/2021	<0.001	<0.001	0.0476	<0.001	<0.001	<0.0015	<0.001	0.24	<0.001	0.0244	<0.0002	0.0209	0.238	0.0024	<0.002
				09/09/2021	--	<0.001	0.0409	--	<0.001	0.0017	<0.001	0.22	<0.001	0.016	--	0.0185	0.778	0.001	--
46	Compliance	41.30395	-89.30347	09/03/2020	--	--	0.0653	--	--	--	--	0.27	--	0.0117	--	0.0254	0.72	<0.001	--
				03/18/2021	<0.001	<0.001	0.0728	<0.001	<0.001	<0.0015	<0.001	0.26	<0.001	0.0112	<0.0002	0.0258	0.48	0.0011	<0.002
				09/09/2021	--	<0.001	0.0675	--	<0.001	<0.0015	<0.001	0.25	<0.001	0.0102	--	0.0229	0.415	<0.001	--
47	Compliance	41.30330	-89.30599	09/02/2020	--	--	0.0932	--	--	--	--	0.29	--	0.0083	--	0.0245	0.39	--	--
				03/18/2021	<0.001	<0.001	0.0939	<0.001	<0.001	<0.0015	<0.001	0.27	<0.001	0.0091	<0.0002	0.0271	0.418	<0.001	<0.002
				09/09/2021	--	<0.001	0.0906	--	<0.001	<0.0015	<0.001	0.28	<0.001	0.0093	--	0.0268	1.34	<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
HENNEPIN POWER PLANT
803 - EAST ASH POND
HENNEPIN, IL

Parameter	Statistical Background Value (LPL/UPL)
40 C.F.R. Part 257 Appendix III	
Boron (mg/L)	0.153
Calcium (mg/L)	280
Chloride (mg/L)	396
Fluoride (mg/L)	0.120
pH (field) (SU)	6.6/7.5
Sulfate (mg/L)	200
Total Dissolved Solids (mg/L)	1520

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
HENNEPIN POWER PLANT
803 - EAST ASH POND
HENNEPIN, 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)	0.038
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
- MONITORING WELL
- PART 257 REGULATED UNIT (SUBJECT UNIT)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY

0 175 350
Feet

MONITORING WELL LOCATION
MAP

2021 ANNUAL GROUNDWATER MONITORING
AND CORRECTIVE ACTION REPORT
EAST ASH POND
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS

FIGURE 1

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.

