

September 5, 2024

SEMIANNUAL REMEDY SELECTION PROGRESS REPORT ASH POND NO. 2 HENNEPIN POWER PLANT

In accordance with Title 40 of the Code of Federal Regulations (40 C.F.R.) § 257.97(a), the owner or operator of a coal combustion residuals (CCR) unit must prepare a semiannual report describing the progress in selecting and designing a remedy for statistically significant levels (SSLs) of constituents listed in Appendix IV of 40 C.F.R. § 257 over the groundwater protection standards (GWPSs) established in accordance with 40 C.F.R. § 257.95(h).

This report is for activities occurring between March 6, 2024 and September 5, 2024 at Ash Pond No. 2 (AP2) at Hennepin Power Plant.

Assessment Monitoring was completed at AP2 during Quarter 1, 2024 in accordance with 40 C.F.R. § 257.95. No SSLs were identified. As stated in previous Semiannual Remedy Selection Progress Reports, SSLs for total lithium and total molybdenum were identified during previous reporting periods. Since these SSLs are no longer present, further evaluation of corrective action is not warranted for AP2. Results from future sampling events will be reviewed to determine if evaluation of corrective action should resume.

As stated in previous Semiannual Remedy Selection Progress Reports, a Corrective Measures Assessment (CMA) was completed for AP2 on September 5, 2019 to address SSLs for total lithium and total molybdenum (see related notification dated February 6, 2019), as required by 40 C.F.R. § 257.96. The CMA evaluated closure-in-place with a soil cover system in accordance with the Closure and Post Closure Care Plan submitted to the Illinois Environmental Protection Agency (IEPA) in February 2018 with final revisions submitted in January 2020. IEPA approved the Closure and Post Closure Care Plan on February 26, 2020. Closure construction began in May 2020 and was completed in November 2020.

AP2 is located in the State of Illinois and is also subject to the state's CCR program located at Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845. An application for an operating permit for AP2 required by 35 I.A.C. § 845.230 was submitted to the Illinois Environmental Protection Agency (IEPA) by October 31, 2021 and is pending approval. An evaluation of background groundwater quality was completed and presented in the operating permit application. The operating permit application and related documents can be found on the company's publicly available CCR website: <https://www.luminant.com/ccr/illinois-ccr/>. Quarterly groundwater sampling for compliance evaluation in accordance with 35 I.A.C. § 845.640 was initiated at AP2 during Quarter 2, 2023. No exceedances of GWPSs established under 35 I.A.C. § 845 have been determined.

Future exceedances of GWPSs established under 35 I.A.C. § 845 may require corrective action through a permitting process administered by IEPA. Therefore, remedy selection will take into consideration compliance with both 40 C.F.R. § 257 and 35 I.A.C. § 845.

In accordance with 40 C.F.R. § 257.97, remedy selection is to be completed as soon as feasible following completion of the CMA. As required by 35 I.A.C. § 845.670, a corrective action plan that identifies the selected remedy must be submitted to IEPA within one year after completing the CMA completed in accordance with 35 I.A.C. § 845.660. It is anticipated that these activities related to 35 I.A.C. § 845 compliance will be initiated following the determination of any exceedances of 35 I.A.C. § 845 GWPSs.