

September 5, 2024

SEMIANNUAL REMEDY SELECTION PROGRESS REPORT WEST ASH POND SYSTEM HENNEPIN POWER PLANT

The owner or operator of a coal combustion residuals (CCR) unit must prepare a semiannual report describing the progress in selecting and designing a groundwater corrective action remedy and developing a corrective action plan.

This report is for activities occurring between March 6, 2024, and September 5, 2024, at the Old West Ash Pond (Pond No. 1 and Pond No. 3) (OWAP) and Old West Polishing Pond (OWPP), collectively referred to as the West Ash Pond System (WAPS), at Hennepin Power Plant.

As stated in the notification letter dated June 21, 2024, statistically significant levels (SSLs) for total arsenic, total cadmium, and total lithium were identified at the WAPS following Assessment Monitoring completed in Quarter 1 of 2024 in accordance with Title 40 of the Code of Federal Regulations (40 C.F.R.) § 257.95, consistent with previous reporting periods. An Alternative Source Demonstration (ASD) for the total cadmium SSL was prepared and submitted with related documentation to the WAPS operating record by the August 20, 2024 deadline.

As stated in previous Semiannual Remedy Selection Progress Reports, a Corrective Measures Assessment (CMA) was completed for the WAPS on September 5, 2019, to address SSLs for total arsenic, 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 geomembrane cover system in accordance with the Closure and Post Closure Care Plan submitted to the Illinois Environmental Protection Agency (IEPA) in January 2018. IEPA approved the Closure and Post Closure Care Plan on June 19, 2018. Closure construction began in August of 2019 and was completed in November of 2020.

The WAPS is located in the State of Illinois and is also subject to compliance with Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845. An application for an operating permit for the WAPS 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 the WAPS during Quarter 2, 2023. Exceedances of groundwater protection standards for arsenic, boron, lithium, sulfate, and total dissolved solids established under 35 I.A.C. § 845 were determined and 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. The 35 I.A.C. § 845 CMA was submitted to IEPA on May 8, 2024. A corrective action plan will be submitted to IEPA on or before May 8, 2025 that meets the requirements of both 40 C.F.R. § 257 and 35 I.A.C. § 845.