

April 3, 2025

SEMIANNUAL REMEDY SELECTION PROGRESS REPORT PRIMARY ASH POND NEWTON 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 October 4, 2024 and April 3, 2025 at the Primary Ash Pond (PAP) at the Newton Power Plant.

An application for an operating permit required by Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845.230 was submitted for the PAP 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 in accordance with 35 I.A.C. § 845.650 was initiated at the PAP during Quarter 2, 2023. Exceedances of groundwater protection standards (GWPSs) established under 35 I.A.C. § 845 were determined and require corrective action through a permitting process administered by IEPA. Accordingly, a Corrective Measures Assessment (CMA) was completed in accordance with 35 I.A.C. § 845.660 and submitted to IEPA on April 3, 2024.

As stated in the notification letter dated June 26, 2024, a statistically significant level (SSL) for total lithium above groundwater protection standards established in accordance with Title 40 of the Code of Federal Regulations (40 C.F.R.) § 257.95(h) was identified at the PAP following Assessment Monitoring completed in accordance with 40 C.F.R. § 257.95. The CMA referenced above also meets the applicable and equivalent requirements of 40 C.F.R. § 257.96 to address this total lithium SSL because one of the 35 I.A.C. § 845.600 GWPS exceedances is similar to the SSL for total lithium identified under 40 C.F.R. § 257.95.

As stated in the notification letter dated January 9, 2025, the SSL identified at the PAP during the Assessment Monitoring event completed Quarter 3, 2024 in accordance with 40 C.F.R. § 257.95 is consistent with related observations during previous reporting periods. Assessment Monitoring was also completed at the PAP during Quarter 1, 2025 in accordance with 40 C.F.R. § 257.95 and SSL identification is pending (related notification due June 20, 2025).

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. Activities currently ongoing in support of developing the corrective action plan include development of a corrective action alternatives analysis, human health and ecological risk assessment, and supporting technical documents. Accordingly, a public meeting was held on February 26, 2025 prior to selection of a remedy in accordance with 35 I.A.C. § 845.660(d) and a corrective action plan was submitted to IEPA on April 1, 2025 that meets the requirements of both 40 C.F.R. § 257 and 35 I.A.C. § 845.