

December 4, 2025

SEMIANNUAL REMEDY SELECTION PROGRESS REPORT ASH POND EDWARDS POWER PLANT

In accordance with Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845.670(a), the owner or operator of a coal combustion residuals (CCR) unit must prepare a semiannual report describing the progress in selecting a groundwater corrective action remedy and developing a corrective action plan.

This report is for activities occurring between June 5, 2025, and December 4, 2025 at the Ash Pond at Edwards Power Plant.

An application for an operating permit for the Ash Pond 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. § 845.650 was initiated at the Ash Pond during Quarter 2, 2023. Exceedances¹ of groundwater protection standards established under 35 I.A.C. § 845 were determined and require corrective action in accordance with 35 I.A.C. § 845.650(d)(3). Accordingly, a Corrective Measures Assessment (CMA) was completed in accordance with 35 I.A.C. § 845.660 and submitted to IEPA on June 4, 2024.

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. Accordingly, a public meeting was held on April 30, 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 June 2, 2025. IEPA approval of the corrective action plan is pending.

¹ Throughout this document, "exceedance" or "exceedances" is intended to refer only to potential exceedances of proposed applicable background statistics or Groundwater Protection Standards (GWPS) as described in the proposed groundwater monitoring program which was submitted to IEPA on October 25, 2021 as part of Illinois Power Resources Generating, LLC's operating permit application for Edwards Power Plant Ash Pond, and subsequently revised on September 4, 2025 and submitted to IEPA on September 4, 2025. That operating permit application, including the proposed groundwater monitoring program, remains under review by IEPA and, therefore, Illinois Power Resources Generating, LLC has not identified any actual exceedances.