



Dynegy Midwest Generation, LLC
1500 Eastport Plaza Dr.
Collinsville, IL 62234

October 25, 2021

Illinois Environmental Protection Agency
DWPC – Permits MC #15
Attn: Part 845 Coal Combustion Residual Rule Submittal
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Re: Hennepin Power Plant East Ash Pond; IEPA ID W1550100002-05

Dear Mr. LeCrone:

In accordance with 35 I.A.C. § 845.200, Dynegy Midwest Generation, LLC (DMG) is submitting an operating permit application for the Hennepin Power Plant East Ash Pond (IEPA ID W1550100002-05). One hardcopy and one digital copy are provided with this submittal.

The permit application was prepared in accordance with 35 I.A.C. § 845.230(d)(2) (Existing, Inactive and Inactive Closed CCR Surface Impoundment that have not completed an Agency approved closure before July 30, 2021). This submittal includes the completed permit forms as required by § 845.210.

Sincerely,

A handwritten signature in blue ink that reads "Cynthia Vodopivec".

Cynthia Vodopivec
SVP-Environmental Health and Safety

Enclosures

Prepared for

Dynegy Midwest Generation, LLC

1500 Eastport Plaza Drive

Collinsville, Illinois 62234

INITIAL OPERATING PERMIT
HENNEPIN EAST ASH POND

Prepared by



425 South Woods Mill Road, Suite 300

St. Louis, MO 63017

October 25, 2021

1.	Introduction.....	1
	1.1. Facility Information.....	1
	1.2. Owner Signatures.....	2
	1.3. Legal Description.....	2
	1.4. Previous Assessments.....	2
2.	Operating Permit.....	4
	2.1. Initial Operating Permit.....	4
	2.2. History of Construction.....	4
	2.3. Chemical Constituents.....	4
	2.4. Location Standards Demonstration.....	5
	2.5. Permanent Markers.....	6
	2.6. Slope Maintenance.....	6
	2.7. Initial Emergency Action Plan.....	6
	2.8. Fugitive Dust Control Plan.....	7
	2.9. Groundwater Monitoring.....	7
	2.10. Initial Post-Closure Care Plan.....	7
	2.11. History of Groundwater Exceedances.....	8
	2.12. Financial Assurance Requirements.....	8
	2.13. Hazard Potential Classification.....	8
	2.14. Structural Stability Assessment.....	8
	2.15. Safety Factor Assessment.....	9
	2.16. Inflow Design Flood Control System Plan.....	9
	2.17. Safety and Health Plan.....	9
	2.18. Proposed Closure Priority Categorization.....	9
3.	Permit Application.....	10

ATTACHMENTS

Attachment A	Legal Description
Attachment B	History of Construction (845.220)
Attachment C	Chemical Constituent Analysis – CCR, Waste Streams
Attachment D	Fault Areas (845.320)
Attachment D	Placement Above the Uppermost Aquifer (845.300)
Attachment D	Seismic Impact Zones (845.330)
Attachment D	Unstable Areas and Floodplains (845.340)
Attachment D	Wetlands (845.310)
Attachment E	Permanent Markers (845.130)
Attachment F	Initial Emergency Action Plan (845.520)
Attachment G	Fugitive Dust Control Plan (845.500)
Attachment H	Hydrogeologic Site Characterization (845.620)
Attachment I	Groundwater Sampling and Analysis Program (845.640)
Attachment J	Slope Maintenance (845.320)
Attachment K	Post Closure Care Plan (845.780)
Attachment M	History of Known Groundwater Exceedances (845.600)
Attachment N	Financial Assurance Requirements (845.900)
Attachment O	Hazard Potential Classification Assessment (845.440)
Attachment P	Structural Stability Assessment (845.450)
Attachment Q	Safety Factor Assessment (845.460)
Attachment R	Inflow Design Flood Control System Plan (845.510)
Attachment S	Safety and Health Plan (845.530)
Attachment T	Proposed Closure Priority Categorization (845.700)
Attachment U	5-Year Updates

1. INTRODUCTION

Dynegy Midwest Generation, LLC (DMG) is operator of the inactive coal-fired Hennepin Power Plant (Plant) located in Putnam County near Hennepin, Illinois. The IEPA assigned identification number assigned to the Hennepin East Ash Pond is: W1550100002-05. The National Inventory of Dams (NID) number assigned for the Hennepin East Ash Pond by the Illinois Department of Natural Resources (IDNR) is IL50363.

This initial operating permit application was developed in accordance with 35 Ill. Admin. Code 845, Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments (Part 845).

This initial operating permit application is for the East Ash Pond.

1.1. Facility Information

Section 845.210(b)(1): All permit applications must contain the name, address, email address and telephone number of the operator, or duly authorized agent, and the property owner to whom all inquiries and correspondence shall be addressed.

Facility:	Hennepin East Ash Pond Hennepin Power Plant 13498 East 800th Street Hennepin, IL 61327
Owner/Operator:	Dynegy Midwest Generation, LLC 1500 Eastport Plaza Drive Collinsville, Illinois 62234

1.2. Owner Signatures

Section 845.210(b)(2): All permit applications must be signed by the owner, operator or a duly authorized agent of the operator.

The owner of the Hennepin Power Plant is a corporation.

Section 845.210(b)(3): An application submitted by a corporation must be signed by a principal executive officer of at least the level of vice president, or his or her duly authorized representative, if that representative is responsible for the overall operation of the facility described in the application form.

The signature of Cynthia Vodopivec on behalf of Dynegy Midwest Generation, LLC can be found in the permit applications located in Section 3.

1.3. Legal Description

Section 845.210(c): All permit applications must contain a legal description of the facility boundary and a description of the boundaries of all units included in the facility.

A legal description has been developed in compliance with Section 845.210(c) and is included in Attachment A.

1.4. Previous Assessments

Section 845.210(d): Previous Assessments, Investigations Plans, and Programs

Previous assessments were performed in accordance with 40 CFR § 257 and are referenced within the permit application and included in the appropriate Attachments.

Section 845.210(d)(1): The Agency may approve the use of any hydrogeologic site investigation or characterization, groundwater monitoring well or system, or groundwater monitoring plan, bearing the seal and signature of an Illinois Licensed Professional Geologist or Licensed Professional Engineer, completed before April 21, 2021 to satisfy the requirements of this Part.

A previous hydrogeologic site investigation or characterization, groundwater monitoring well or system, or groundwater monitoring plan have been completed with a seal from an Illinois Licensed Professional Geologist or Licensed Professional Engineer. However, field investigations have been completed that supplement that work that will be utilized in the following sections of this report.

Section 845.210(d)(2): For existing CCR surface impoundments, the owner or operator of the CCR surface impoundment may use a previously completed location restriction demonstration required by Section 845.300 (Placement Above the Uppermost Aquifer), Section 845.310 (Wetlands), Section 845.320 (Fault Areas), Section 845.330 (Seismic Impact Zones), and Section 845.340 (Unstable Areas) provided that the previously completed assessments meet the applicable requirements of those Sections.

Previous assessments are provided for Section 845.300 (Placement Above the Uppermost Aquifer), Section 845.310 (Wetlands), Section 845.320 (Fault Areas), Section 845.330 (Seismic Impact Zones), and Section 845.340 (Unstable Areas) in Attachment D.

Section 845.210(d)(3): For existing CCR surface impoundments, the owner or operator of the CCR surface impoundment may use a previously completed assessment to serve as the initial assessment required by Section 845.440 (Hazard Potential Classification Assessment), Section 845.450 (Structural Stability Assessment) and Section 845.460 (Safety Factor Assessment) provided that the previously completed assessment: A) Was not completed more than five years ago; and B) Meets the applicable requirements of those Sections.

Previous assessments are provided for Section 845.440 (Hazard Potential Classification Assessment), Section 845.450 (Structural Stability Assessment) and Section 845.460 (Safety Factor Assessment) in Attachments O, P, and Q respectively. The addendum and certification for the Hazard Potential Classification Assessment, Structural Stability Assessment and Safety Factor Assessment are located in Attachment U.

Section 845.210(d)(4): For inactive closed CCR surface impoundments, the owner or operator of the CCR surface impoundment may use a post-closure care plan previously approved by the Agency.

No post-closure care plan was previously approved by the Agency.

2. OPERATING PERMIT

2.1. Initial Operating Permit

Section 845.230(d): Initial Operating Permit for Existing, Inactive and Inactive Closed CCR Surface Impoundments

The Hennepin East Ash Pond is defined by the IEPA as an existing CCR surface impoundment that has not completed post-closure care. Per Part 845, DMG is submitting an initial operating permit application to IEPA by October 31, 2021. The permit applications (CCR-1 and CCR-2E) are provided in Section 3.

The following sections contain information or references to documents required for the Operating Permit application (Section 845.230).

2.2. History of Construction

Section 845.230(d)(2)(A): The history of construction specified in Section 845.220(a)(1);

The history of construction prepared in 2016 pursuant to 40 CFR § 257.73(c) is provided in Attachment B. An amendment to the history of construction has been prepared in compliance with Section 845.220(a)(1) and is provided in Attachment U.

2.3. Chemical Constituents

Section 845.230(d)(2)(B): An analysis of the chemical constituents found within the CCR to be placed in the CCR surface impoundment;

An analysis of the chemical constituents found within the CCR placed within the Hennepin East Ash Pond is provided in Attachment C.

Section 845.230(d)(2)(C): An analysis of the chemical constituents of all waste streams, chemical additives and sorbent materials entering or contained in the CCR surface impoundment;

An analysis of the chemical constituents of all waste streams, chemical additives and sorbent materials entering or contained within the Hennepin East Ash Pond is provided in Attachment C.

2.4. Location Standards Demonstration

Section 845.230(d)(2)(D): *A demonstration that the CCR surface impoundment, as built, meets, or an explanation of how the CCR surface impoundments fails to meet, the location standards in the following Sections:*

The Hennepin East Ash Pond location standards as specified in Section 845.230(d)(2)(D) are described in the following sections.

Section 845.230(d)(2)(D)(i): *Placement Above the Uppermost Aquifer;*

The previous upper aquifer demonstration was certified by a qualified professional engineer stating that the demonstration meets the requirements of 40 C.F.R. § 257.60. The requirements described in 40 C.F.R. § 257.60 are identical to the requirements contained in Section 845.300. Pursuant to Section 845.210(d)(2), a certification is not required for this demonstration. The previously completed upper aquifer demonstration is included in Attachment D.

Section 845.230(d)(2)(D)(ii): *Wetlands;*

The previous wetlands demonstration was certified by a qualified professional engineer stating that the demonstration meets the requirements of 40 C.F.R. § 257.61. The requirements described in 40 C.F.R. § 257.61 are identical to the requirements contained in Section 845.310. Pursuant to Section 845.210(d)(2), a certification is not required for this demonstration. The previously completed wetlands demonstration is included in Attachment D.

Section 845.230(d)(2)(D)(iii): *Fault Areas;*

The previous fault area demonstration was certified by a qualified professional engineer stating that the demonstration meets the requirements of 40 C.F.R. § 257.62. The requirements described in 40 C.F.R. § 257.62 are identical to the requirements contained in Section 845.320. Pursuant to Section 845.210(d)(2), a certification is not required for this demonstration. The previously completed fault area demonstration is included in Attachment D.

Section 845.230(d)(2)(D)(iv): *Seismic Impact Zone; and*

The previous seismic impact zone demonstration was certified by a qualified professional engineer stating that the demonstration meets the requirements of 40 C.F.R. § 257.63. The requirements described in 40 C.F.R. § 257.63 are identical to the requirements contained in Section 845.330. Pursuant to Section 845.210(d)(2), a certification is not required for this

demonstration. The previously completed seismic impact zone demonstration is included in Attachment D.

Section 845.230(d)(2)(D)(v): Unstable Areas and Floodplains;

The previous unstable area demonstration was certified by a qualified professional engineer stating that the demonstration meets the requirements of 40 C.F.R. § 257.64. The requirements described in 40 C.F.R. § 257.64 are identical to the requirements contained in Section 845.340. Pursuant to Section 845.210(d)(2), a certification is not required for the unstable area demonstration. The previously completed unstable area demonstration is included in Attachment D.

The boundaries of the impoundment were determined by a survey conducted by a professional surveyor licensed in the State of Illinois. The boundaries of the Ash Pond were compared to the existing FEMA floodplain map, and it was determined that the Ash Pond is located within the floodplain. A demonstration was performed to evaluate compliance with 35 I.A.C. Section 845.340(c). A certification attesting to compliance is provided in Attachment D.

2.5. Permanent Markers

Section 845.230(d)(2)(E): Evidence of permanent markers required by Section 845.130 have been installed;

Evidence of permanent markers at the Hennepin East Ash Pond as required by Section 845.130 is provided in Attachment E.

2.6. Slope Maintenance

Section 845.230(d)(2)(F): Documentation that the CCR surface impoundment, if not incised, will be operated and maintained with one of the forms of slope protection specified in Section 845.430;

The Hennepin East Ash Pond is not incised. Documentation of slope protection as required by Section 845.430 is provided in Attachment J.

2.7. Initial Emergency Action Plan

Section 845.230(d)(2)(G): Initial Emergency Action Plan and accompanying certification (see Section 845.520(e));

The initial emergency action plan and certification has been completed as specified by Section 845.520(e) and is provided in Attachment F.

2.8. Fugitive Dust Control Plan

Section 845.230(d)(2)(H): Fugitive dust control plan and accompanying certification (see Section 845.500(b)(7));

The fugitive dust control plan and certification has been completed as specified by Section 845.500(b)(7) and is provided in Attachment G.

2.9. Groundwater Monitoring

Section 845.230(d)(2)(I): Groundwater monitoring information:

The groundwater monitoring information for the Hennepin East Ash Pond are described in the following sections.

Section 845.230(d)(2)(I)(i): Hydrogeologic site characterization (see Section 845.620);

Hydrogeologic site characterization for the Hennepin East Ash Pond is provided in Attachment H.

Section 845.230(d)(2)(I)(ii): Design and construction plans of a groundwater monitoring system (see Section 845.630);

Design and construction plans of a groundwater monitoring system are provided in Attachment I.

Section 845.230(d)(2)(I)(iii): A groundwater sampling and analysis program that includes selection of the statistical procedures to be used for evaluating groundwater monitoring data (see Section 845.640); and

A groundwater sampling and analysis program that meets the requirements of Section 845.640 is provided in Attachment I.

Section 845.230(d)(2)(I)(iv): Proposed groundwater monitoring program that includes a minimum of eight independent samples for each background and downgradient well (see Section 845.650(b));

A proposed groundwater monitoring program that meets the requirements of Section 845.650(b) is provided in Attachment I.

2.10. Initial Post-Closure Care Plan

Section 845.230(d)(2)(K): Initial written post-closure care plan, if applicable (see Section 845.780(d));

The Hennepin East Ash Pond closure will be completed by capping the CCR in place. The initial post closure care plan was developed in accordance with Section 845.780 and is provided in Attachment K.

2.11. History of Groundwater Exceedances

Section 845.230(d)(2)(M): History of known exceedances of the groundwater protection standards in Section 845.600, and any corrective action taken to remediate the groundwater;

A history of known exceedances and any corrective action taken is provided in Attachment M.

2.12. Financial Assurance Requirements

Section 845.230(d)(2)(N): A certification that the owner or operator meets the financial assurance requirements of Subpart I;

A certification meeting the requirement of Section 845.230(d)(2)(N) stating that the Owner meets the financial assurance requirements of *Subpart I* is provided in Attachment N.

2.13. Hazard Potential Classification

Section 845.230(d)(2)(O): Hazard potential classification assessment and accompanying certification (see Section 845.440(a)(2));

The previous Hazard Potential Classification Assessment completed in compliance with 40 CFR §257.73(a) is provided in Attachment O. The addendum to the Hazard Potential Classification Assessment and certification as required by Section 845.440(a) is provided in Attachment U.

2.14. Structural Stability Assessment

Section 845.230(d)(2)(P): Structural stability assessment and accompanying certification (see Section 845.450(c));

The previous Structural Stability Assessment completed in compliance with 40 CFR §257.73(d) is provided in Attachment P. The addendum to the Structural Stability Assessment and certification as required by Section 845.450(c) is provided in Attachment U.

2.15. Safety Factor Assessment

Section 845.230(d)(2)(Q): Safety factor assessment and accompanying certification (see Section 845.460(b));

The previous Safety Factor Assessment completed in compliance with 40 CFR §257.73(e) is provided in Attachment Q. The addendum to the Safety Factor Assessment and certification as required by Section 845.460(b) is provided in Attachment U.

2.16. Inflow Design Flood Control System Plan

Section 845.230(d)(2)(R): Inflow design flood control system plan and accompanying certification (see Section 845.510(c)(3));

The previous Inflow Design Flood Control System Plan Assessment completed in compliance with 40 CFR §257.82 is provided in Attachment R. The addendum to the Inflow Design Flood Control Plan Assessment as required by Section 845.510(c)(3) is provided in Attachment U.

2.17. Safety and Health Plan

Section 845.230(d)(2)(S): Safety and health plan (see Section 845.530); and

The safety and health plan in accordance with Section 845.530 is included in Attachment S.

2.18. Proposed Closure Priority Categorization

Section 845.230(d)(2)(T): For CCR surface impoundments required to close under 845.700, the proposed closure priority categorization required by Section 845.700(g).

A CCR Surface Impoundment Category Designation and Justification letter was submitted to IEPA on May 19, 2021. The Hennepin East Ash Pond was designated as Category 3 Existing CCR surface impoundment in compliance with groundwater protection standards in Section 845.600. This letter is provided in Attachment T.

3. PERMIT APPLICATION

All permit applications must be made on the forms prescribed by the Agency and must be mailed or delivered to the address designated by the Agency on the forms. The permit applications (CCR-1 and CCR-2E) are provided below.



**Illinois Environmental Protection Agency
CCR Surface Impoundment Permit Application
Form CCR 1 – General Provisions**

Bureau of Water ID Number:

For IEPA Use Only

CCR Permit Number:

Facility Name:

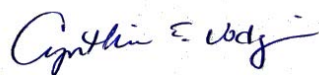
SECTION 1: FACILITY, OPERATOR, AND OWNER INFORMATION (35 Ill. Adm. Code 845.210(b))

Facility, Operator, and Owner Information	1.1	Facility Name		
	1.2	Illinois EPA CCR Permit Number (if applicable)		
	1.3	Facility Contact Information		
		Name (first and last)	Title	Phone Number
		Email address		
	1.4	Facility Mailing Address		
		Street or P.O. box		
		City or town	State	Zip Code
	1.5	Facility Location		
		Street, route number, or other specific identifier		
		County name	County code (if known)	
	City or town	State	Zip Code	
1.6	Name of Owner/Operator			

Facility, Operator, and Owner Info	1.7	Owner/Operator Contact Information		
		Name (first and last)	Title	Phone Number
		Email address		
	1.8	Owner/Operator Mailing Address		
		Street or P.O. box		
	City or town	State	Zip Code	
SECTION 2: LEGAL DESCRIPTION (35 Ill. Adm. Code 845.210(c))				
Legal Description	2.1	Legal Description of the facility boundary		
SECTION 3: PUBLICLY ACCESSIBLE INTERNET SITE REQUIREMENTS (35 Ill. Adm. Code 845.810)				
Internet Site	3.1	Web Address(es) to publicly accessible internet site(s) (CCR website)		
	3.2	Is/are the website(s) titled "Illinois CCR Rule Compliance Data and Information"		
		Yes	No	
SECTION 4: IMPOUNDMENT IDENTIFICATION				
Impoundment Identification	4.1	List all the impoundment identification numbers for your facility and check the corresponding box to indicate that you have attached a written description for each impoundment.		
			Attached written description	
			Attached written description	
			Attached written description	
			Attached written description	
			Attached written description	
			Attached written description	

			Attached written description
			Attached written description
			Attached written description
			Attached written description

SECTION 5: CHECKLIST AND CERTIFICATION STATEMENT

Checklist and Certification Statement	5.1	In Column 1 below, mark the sections of Form 1 that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing.		
		Column 1		Column 2
		Section 1: Facility, Operator, and Owner Information		w/attachments
		Section 2: Legal Description		w/attachments
		Section 3: Publicly Accessible Internet Site Requirement		w/attachments
		Section 4: Impoundment Identification		w/attachments
	5.2	Certification Statement		
		I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.		
		Name (print or type first and last name) of Owner/Operator		Official Title
		Signature 		Date Signed



Illinois Environmental Protection Agency
CCR Surface Impoundment Permit Application
Form CCR 2E – Initial Operating Permit for Existing or Inactive CCR
Surface Impoundments That Have Not Completed an
Agency-approved Closure Before July 30, 2021

Bureau of Water ID Number:

For IEPA Use Only

CCR Permit Number:

Facility Name:

SECTION 1: CONSTRUCTION HISTORY (35 Ill. Adm. Code 845.220 AND 35 Ill. Adm. Code 845.230)

Construction History	1.1	CCR surface impoundment name.
	1.2	Identification number of the CCR surface impoundment (if one has been assigned by the Agency).
	1.3	Description of the boundaries of the CCR surface impoundment (35 Ill. Adm. Code 845.210(c)).
	1.4	State the purpose for which the CCR surface impoundment is being used.
	1.5	How long has the CCR surface impoundment been in operation?
	1.6	List the types of CCR that have been placed in the CCR surface impoundment.

Construction History (Continued)	1.7	List name of the watershed within which the CCR surface impoundment is located.		
	1.8	Size in acres of the watershed within which the CCR surface impoundment is located.		
	1.9	Check the corresponding box to indicate that you have attached the following:		
		Description of the physical and engineering properties of the foundation and abutment materials on which the CCR surface impoundment is constructed.		
		Description of the type, size, range, and physical and engineering properties of the materials used in constructing each zone or stage of the CCR surface impoundment.		
		Describe the method of site preparation and construction of each zone of the CCR surface impoundment.		
		A listing of the approximate dates of construction of each successive stage of construction of the CCR surface impoundment.		
		Drawing satisfying the requirements of 35 Ill. Adm. Code 845.220(a)(1)(F).		
		Description of the type, purpose, and location of existing instrumentation.		
		Area capacity curves for the CCR Impoundment.		
		Description of each spillway and diversion design features and capacities and provide the calculations used in their determination.		
	Construction specifications and provisions for surveillance, maintenance, and repair of the CCR surface impoundment.			
1.10.1	Is there any record or knowledge of structural instability of the CCR surface impoundment?			
	Yes		No	
1.10.2	If you answered yes to Item 1.10.1, provide detailed explanation of the structural instability.			
SECTION 2: ANALYSIS OF CHEMICAL CONSTITUENTS (35 Ill. Adm. Code 845.230(d)(2)(B))				
Constituents	2.1	Check the corresponding boxes to indicate you have attached the following:		
		An analysis of the chemical constituents found within the CCR to be placed in the CCR surface impoundment.		
		An analysis of the chemical constituents of all waste streams, chemical additives and sorbent materials entering or contained in the CCR surface impoundment.		

SECTION 3: DEMONSTRATIONS AND CERTIFICATIONS (35 Ill. Adm. Code 845.230(d)(2)(D))

Demonstrations	3.1	Indicate whether you have attached a demonstration that the CCR surface impoundment, as built, meets, or an explanation of how the CCR surface impoundments fails to meet, the location standards in the following sections:			
		35 Ill. Adm. Code 845.300 (Placement Above the Uppermost Aquifer)		Demonstration	Explanation
		35 Ill. Adm. Code 845.310 (Wetlands)		Demonstration	Explanation
		35 Ill. Adm. Code 845.320 (Fault Areas)		Demonstration	Explanation
		35 Ill. Adm. Code 845.330 (Seismic Impact Zones)		Demonstration	Explanation
		35 Ill. Adm. Code 845.340 (Unstable Areas and Floodplains)		Demonstration	Explanation

SECTION 4: ATTACHMENTS

Attachments	4.1	Check the corresponding boxes to indicate that you have attached the following:		
		<input type="checkbox"/>	Evidence that the permanent markers required by 35 Ill. Adm. Code 845.130 have been installed.	
		<input type="checkbox"/>	Documentation that the CCR surface impoundment, if not incised, will be operated and maintained with one of the forms of slope protection specified in 35 Ill. Adm. Code 845.430.	
		<input type="checkbox"/>	Initial Emergency Action Plan and accompanying certification required by 35 Ill. Adm. Code 845.520(e).	
		<input type="checkbox"/>	Fugitive dust control plan and accompanying certification required by 35 Ill. Adm. Code 845.500(b)(7).	
		<input type="checkbox"/>	Preliminary written closure plan as specified in 35 Ill. Adm. Code 845.720(a).	
		<input type="checkbox"/>	Initial written post-closure care plan as specified in 35 Ill. Adm. Code 845.780(d), if applicable.	
		<input type="checkbox"/>	A certification as specified in 35 Ill. Adm. Code 845.400(h), or a statement that the CCR surface impoundment does not have a liner than meets the requirements of 35 Ill. Adm. Code 845.400(b) or (c).	
		<input type="checkbox"/>	History of known exceedances of the groundwater protection standards in 35 Ill. Adm. Code 845.600, and any corrective action taken to remediate the groundwater.	
		<input type="checkbox"/>	Safety and health plan, as required by 35 Ill. Adm. Code 845.530.	
	<input type="checkbox"/>	For CCR surface impoundments required to close under 35 Ill. Adm. Code 845.700, the proposed closure priority categorization required by 35 Ill. Adm. Code 845.700(g).		

SECTION 5: GROUNDWATER MONITORING

Groundwater	5.1	Check the corresponding boxes to indicate you have attached the following groundwater monitoring information:		
		<input type="checkbox"/>	A hydrogeologic site characterization meeting the requirements of 35 Ill. Adm. Code 845.620.	
		<input type="checkbox"/>	Design and construction plans of a groundwater monitoring system meeting the requirements of 35 Ill. Adm. Code 845.630.	

		A groundwater sampling and analysis program that includes section of the statistical procedures to be used for evaluating groundwater monitoring data, required by 35 Ill. Adm. Code 845.640.
		Proposed groundwater monitoring program that includes a minimum of eight independent samples for each background and downgradient well, required by 35 Ill. Adm. Code 845.650(b).

SECTION 6: CERTIFICATIONS

Certifications	6.1	Check the corresponding boxes to indicate you have attached the following certifications:	
			A certification that the owner or operator meets the financial assurance requirements of Subpart I, as required by 35 Ill. Adm. Code 845.230(d)(2)(N).
			Hazard potential classification assessment and accompanying certifications required by 35 Ill. Adm. Code 845.440(a)(2).
			Structural stability assessment and accompanying certification, required by 35 Ill. Adm. Code 845.450(c).
			Safety factor assessment and accompanying certification, as required by 35 Ill. Adm. Code 845.460(b).
			Inflow design flood control system plan and accompanying certification, as required by 35 Ill. Adm. Code 845.510(c)(3).

ATTACHMENT A

CONTROL MONUMENTATION TABLE				
POINT #	NORTHING	EASTING	ELEVATION	DESCRIPTION
2007	1688860.60	2534632.47	526.23	FOUND MAG NAIL
2026	1687419.25	2526768.08	448.87	BRASS PLUG IN PVC CONCRETE MONUMENT
4204	1688760.04	2526732.99	443.25	FOUND IRON PIN

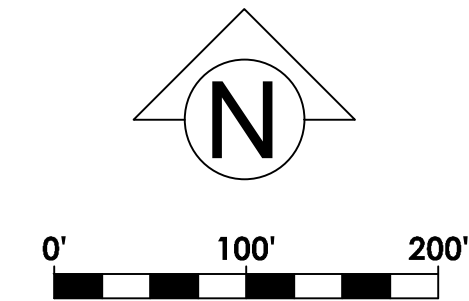


Luminant DYNEGY MIDWEST GENERATION, LLC HENNEPIN POWER PLANT

CCR FACILITY BOUNDARY CORNERS				
Point #	Northing	Eastng	Elevation	Description
1013	1689896.08	2533261.65	497.75	SET I.P.
1014	1689723.50	2532799.73	495.69	SET I.P.
1015	1689102.71	2533256.07	499.11	SET I.P.
1017	1688845.48	2533445.15	0.00	
1018	1688966.30	2533356.34	0.00	
1019	1690108.87	2533782.87	0.00	
1020	1690050.50	2533941.18	0.00	
1021	1689488.89	2534231.22	0.00	
1022	1689385.42	2534193.84	0.00	
1023	1689087.06	2533489.66	0.00	

- LEGEND
- SECTION LINE
 - RESTRICTED USE BOUNDARY
 - FACILITY BOUNDARY
 - FOUND SURVEY MARKER AS NOTED

SURVEY NOTE:
THIS DRAWING AND THE INFORMATION SHOWN HERE ON WAS OBTAINED FROM DATA COLLECTED FROM A FIELD SURVEY MADE BY INGENAE, LLC BETWEEN FEBRUARY 12 THROUGH JULY 21, 2021. SURVEY COORDINATES, BEARINGS & DISTANCES ARE REFERENCED TO ILLINOIS WEST 1202 STATE PLANE COORDINATE SYSTEM NAD 1983.



Land Description of the Hennepin Power Plant East New Primary Ash Pond Facility Boundary 21.08 Acres

Part of the North Half of Section 26 Township 33 North, Range 2 West of the Third Principal Meridian, Putnam County, Illinois being more particularly described as follows:

Commencing at the found Magnetic Nail at the East Quarter Corner of Section 26, from which bears an Iron Pin at the Center of Section 27, South 89 degrees 16 minutes 15 seconds West a distance of 7900.12 feet; thence from said commencement point at the East Quarter Corner of Section 26, South 89 degrees 16 minutes 15 seconds West a distance of 1187.42 feet; thence North 36 degrees 19 minutes 09 seconds West a distance of 149.95 feet to the Point of Beginning of the Tract described herein; thence continuing North 36 degrees 19 minutes 09 seconds West a distance of 939.76 feet; thence North 69 degrees 30 minutes 49 seconds East a distance of 493.10 feet; thence North 67 degrees 47 minutes 30 seconds East a distance of 562.99 feet; thence along a curve to the right having a radius of 125.00, feet a curve length of 185.21 feet, a chord bearing South 69 degrees 45 minutes 39 seconds East a distance of 168.73 feet; thence South 27 degrees 18 minutes 48 seconds East a distance of 632.08 feet; thence along a curve to the right having a radius of 75.00 feet, a curve length of 123.51 feet, a chord bearing South 19 degrees 51 minutes 44 seconds West a distance of 110.02 feet; thence South 67 degrees 02 minutes 16 seconds West a distance of 764.78 feet; thence South 47 degrees 49 minutes 49 seconds West a distance of 179.89 feet to the Point of Beginning and containing 21.08 Acres.

SURVEYOR CERTIFICATE:
THIS IS TO CERTIFY THAT WE, INGENAE, LLC, HAVE AT THE REQUEST OF AND FOR THE EXCLUSIVE USE OF THE OWNERS, PERFORMED A SURVEY OF THE TRACT AS SHOWN HEREON AND THAT THIS IS A TRUE REPRESENTATION OF THAT SURVEY. THIS PLAT AND THE SURVEY FROM WHICH IT IS BASED WERE DONE IN ACCORDANCE WITH THE "MINIMUM STANDARDS OF PRACTICE" FOR LAND SURVEYING IN THE STATE OF ILLINOIS.

INGENAE, LLC
PROFESSIONAL DESIGN FIRM
LICENSE NO. 184.007588-0010

Michael J. Graminski



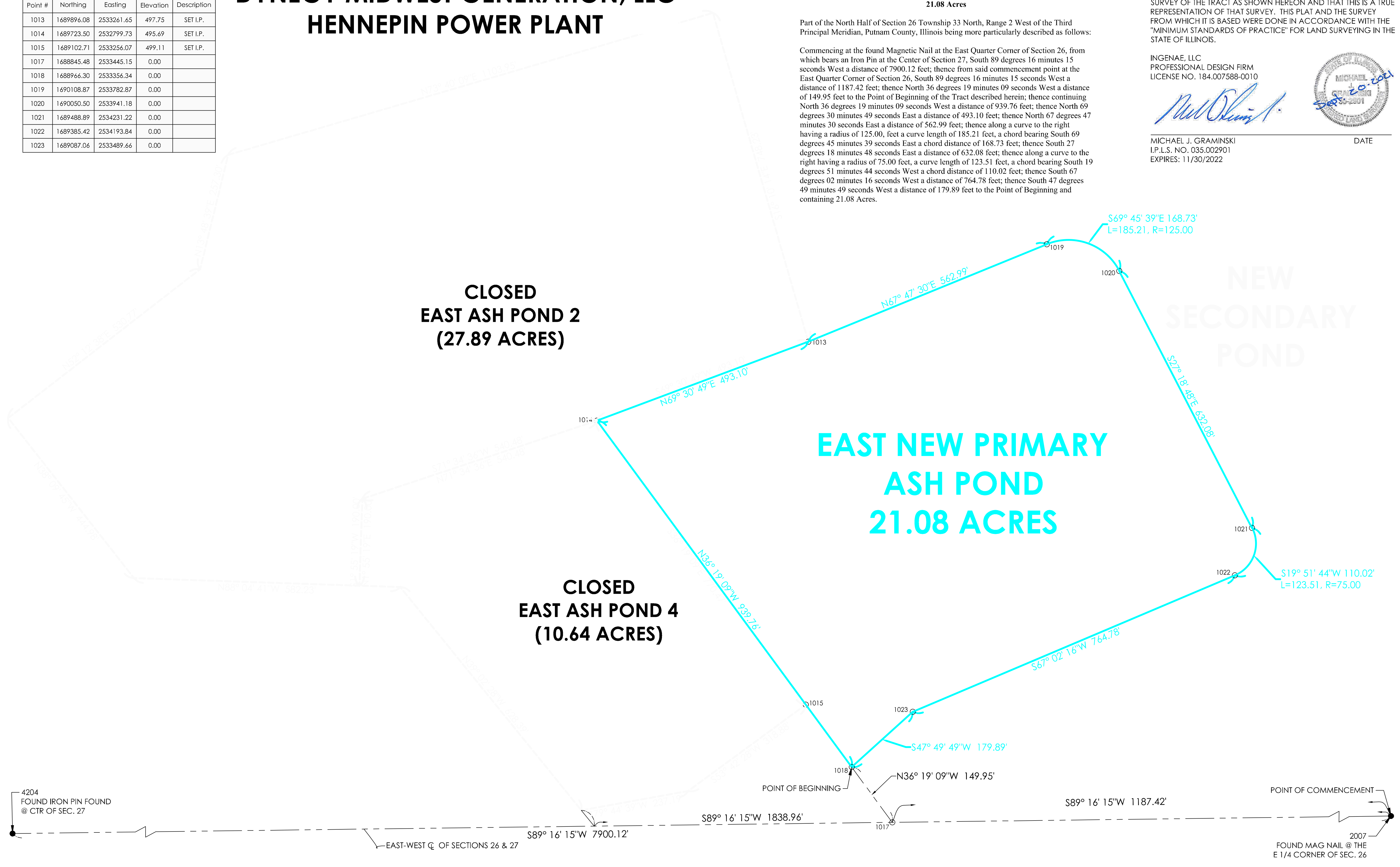
MICHAEL J. GRAMINSKI
I.P.L.S. NO. 035.002901
EXPIRES: 11/30/2022

DATE

**CLOSED
EAST ASH POND 2
(27.89 ACRES)**

**EAST NEW PRIMARY
ASH POND
21.08 ACRES**

**CLOSED
EAST ASH POND 4
(10.64 ACRES)**



4204
FOUND IRON PIN FOUND
@ CTR OF SEC. 27

POINT OF BEGINNING

POINT OF COMMENCEMENT



502 Earth City Plaza, Suite 120
Earth City, MO 63045
www.ingenae.com

Submissions / Revisions:	Date:
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	



Project Name & Location:
**HENNEPIN
POWER PLANT
13498 EAST 800TH STREET
HENNEPIN, IL
61327**

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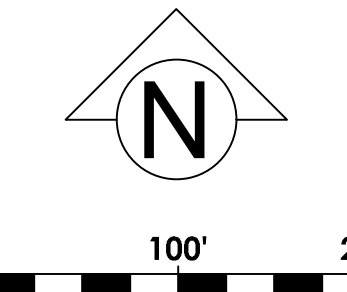
Drawing Name:
**CCR FACILITY
BOUNDARY
EXHIBIT**

Date: 9/21/2021	Project No.
Type: SITE	Drawing No.
Drawn By: CB	1
Approved By: MG	
Scale: AS NOTED	

CONTROL MONUMENTATION TABLE				
POINT #	NORTHING	EASTING	ELEVATION	DESCRIPTION
2007	1688860.60	2534632.47	526.23	FOUND MAG NAIL
2026	1687419.25	2526768.08	448.87	BRASS PLUG IN PVC CONCRETE MONUMENT
4204	1688760.04	2526732.99	443.25	FOUND IRON PIN



Luminant DYNEGY MIDWEST GENERATION, LLC HENNEPIN POWER PLANT

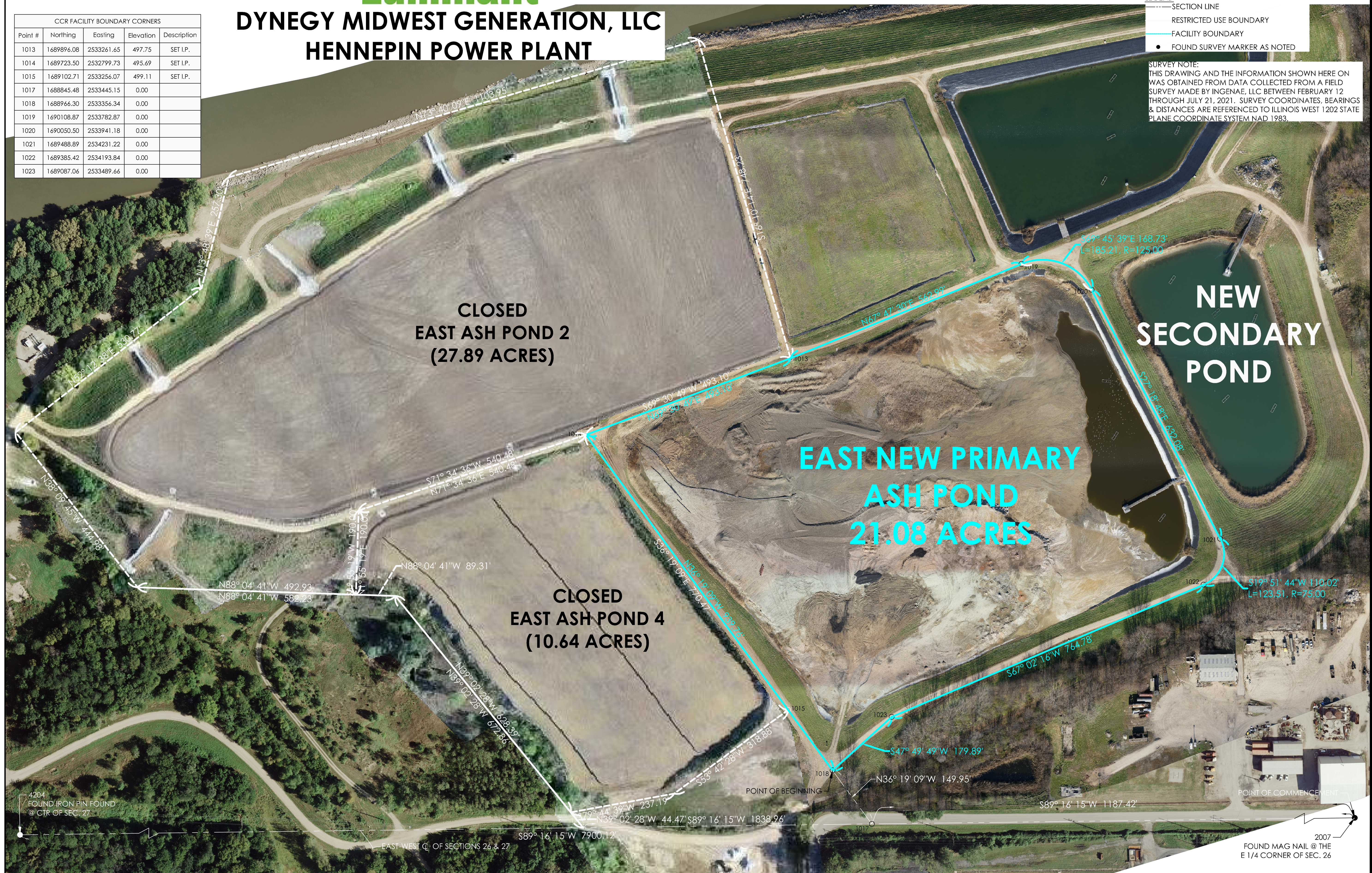


LEGEND

- SECTION LINE
- RESTRICTED USE BOUNDARY
- FACILITY BOUNDARY
- FOUND SURVEY MARKER AS NOTED

SURVEY NOTE:
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CCR FACILITY BOUNDARY CORNERS				
Point #	Northing	Easting	Elevation	Description
1013	1689896.08	2533261.65	497.75	SET I.P.
1014	1689723.50	2532799.73	495.69	SET I.P.
1015	1689102.71	2533256.07	499.11	SET I.P.
1017	1688845.48	2533445.15	0.00	
1018	1688966.30	2533356.34	0.00	
1019	1690108.87	2533782.87	0.00	
1020	1690050.50	2533941.18	0.00	
1021	1689488.89	2534231.22	0.00	
1022	1689385.42	2534193.84	0.00	
1023	1689087.06	2533489.66	0.00	



IngenAE
502 Earth City Plaza, Suite 120
Earth City, MO 63045
www.ingenae.com

Submissions / Revisions:	Date:
1	
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Luminant
Project Name & Location:
**HENNEPIN
POWER PLANT
13498 EAST 800TH STREET
HENNEPIN, IL
61327**

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Drawing Name:
**CCR FACILITY
BOUNDARY
EXHIBIT**

Date: 9/21/2021	Project No.
Type: SITE	Drawing No. 2
Drawn By: CB	
Approved By: MG	
Scale: AS NOTED	

ATTACHMENT B



October 2016

Dynegy Midwest Generation, LLC
13498 E 800th St.
Hennepin, IL 61327

**RE: History of Construction
USEPA Final CCR Rule, 40 CFR § 257.73(c)
Hennepin Power Station
Hennepin, Illinois**

On behalf of Dynegy Midwest Generation, LLC, AECOM has prepared the following history of construction for the Old West Polishing Pond, Old West Ash Pond, Ash Pond No. 2, and East Ash Pond at the Hennepin Power Station in accordance with 40 CFR § 257.73(c).

BACKGROUND

40 CFR § 257.73(c)(1) requires the owner or operator of an existing coal combustion residual (CCR) surface impoundment that either (1) has a height of five feet or more and a storage volume of 20 acre-feet or more, or (2) has a height of 20 feet or more to compile a history of construction by October 17, 2016 that contains, to the extent feasible, the information specified in 40 CFR § 257.73(c)(1)(i)–(xii).

The history of construction presented herein was compiled based on existing documentation, to the extent that it is reasonably and readily available (see 80 Fed. Reg. 21302, 21380 [April 17, 2015]), and AECOM's site experience. AECOM's document review included construction drawings, geotechnical investigations, operation and maintenance information, etc. for Old West Polishing Pond, Old West Ash Pond, Ash Pond No. 2, and East Ash Pond at the Hennepin Power Station.

HISTORY OF CONSTRUCTION

§ 257.73(c)(1)(i): The name and address of the person(s) owning or operating the CCR unit; the name associated with the CCR unit; and the identification number of the CCR unit if one has been assigned by the state.

Owner: Dynegy Midwest Generation, LLC

Address: 1500 Eastport Plaza Drive
Collinsville, IL 62234

CCR Units: Old West Polishing Pond
Old West Ash Pond (Pond No. 1 and Pond No. 3)
Ash Pond No. 2
East Ash Pond, IDNR Dam ID No. IL50363

The Old West Polishing Pond, Old West Ash Pond, and Ash Pond No. 2 do not have a state assigned identification number.

§ 257.73(c)(1)(ii): The location of the CCR unit identified on the most recent USGS 7¹/₂ or 15 minute topographic quadrangle map or a topographic map of equivalent scale if a USGS map is not available.

The locations of the Old West Polishing Pond, Old West Ash Pond, Ash Pond No. 2, and East Ash Pond have been identified on an USGS 7-1/2 minute topographic quadrangle map in **Appendix A**.

§ 257.73(c)(1)(iii): A statement of the purpose for which the CCR unit is being used.

The following captures the purpose of each CCR unit:

- The Old West Polishing Pond (inactive) was used to store and dispose fly ash and bottom ash and is currently being used to clarify stormwater runoff from the Old West Ash Pond prior to discharge in accordance with the station's NPDES permit.
- The Old West Ash Pond (inactive) was used to store and dispose fly ash and bottom ash.
- The Ash Pond No. 2 (inactive) was used to store and dispose fly ash, bottom ash, and other non-CCR waste streams including coal pile runoff.
- The East Ash Pond is being used to store and dispose bottom ash, fly ash, and other non-CCR waste and to clarify process water prior to discharge in accordance with the station's NPDES permit.

Notice of intent to close the Old West Polishing Pond, Old West Ash Pond, and Ash Pond No. 2 was provided in November 2015.¹

¹ This history of construction report was prepared on a facility-wide basis for CCR surface impoundments at the Hennepin Power Station. The inclusion of the Old West Polishing Pond, Old West Ash Pond, and Ash Pond No. 2 in this history of construction report does not concede and should not be construed to concede that the Old

§ 257.73(c)(1)(iv): The name and size in acres of the watershed where the CCR unit is located.

The Hennepin Power Station and the above-referenced CCR units are located at the western edge of the Depue Lake-Illinois River Watershed with a 12-digit Hydrologic Unit Code (HUC) of 071300010804 and a drainage area of 44,525 acres (USGS 2016).

§ 257.73(c)(1)(v): A description of the physical and engineering properties of the foundation and abutment materials on which the CCR unit is constructed.

Physical properties of the foundation materials for the Old West Polishing Pond and Old West Ash Pond are described as cohesive material underlain by granular material. The cohesive material consists of lean clay, gravelly clay, silt, clayey silt, and sandy silt. The consistency of the cohesive material varies from very soft to medium stiff. The granular material consists of silty sand and clayey gravel. The relative density of the granular materials varies from loose to very dense and generally increases with depth. An available summary of the engineering properties of the foundation materials for the Old West Polishing Pond and Old West Ash Pond is presented in **Table 1** below. The engineering properties are based on previous geotechnical explorations and laboratory testing.

Table 1. Summary of Material Engineering Properties for the Old West Polishing Pond and Old West Ash Pond

Layer	Unit Weight (pcf)	Total (undrained) Shear Strength Parameters		Effective (drained) Shear Strength Parameters	
		ϕ (deg)	c (psf)	ϕ' (deg)	c' (psf)
CL (soft)	120	0	500	28	0
CL (medium stiff gravelly clay)	120	28	0	28	0
ML (soft to medium stiff)	125	28	0	28	0
CL-ML (very soft)	120	0	400	26	0
SM (very loose)	125	28	0	28	0
GC (dense)	130	34	0	34	0
GC (very dense)	130	36	0	36	0
Fill: GC (very dense)	130	34	50	34	0

West Polishing Pond, Old West Ash Pond, and Ash Pond No. 2 are subject to the Design Criteria or all Operating Criteria in the CCR Rule.

The Old West Polishing Pond and Old West Ash Pond are enclosed impoundments with dikes and do not have abutments.

Physical properties of the foundation and abutment materials for Ash Pond No. 2 and the East Ash Pond are described as gravel materials with varying amounts of silt and clay. The relative density of the gravel is medium dense to very dense. An available summary of the engineering properties of the foundation materials for Ash Pond No. 2 and the East Ash Pond is presented in **Table 2** below. The engineering properties are based on previous geotechnical explorations and laboratory testing.

Table 2. Summary of Foundation and Abutment Material Engineering Properties for the Ash Pond No. 2 and East Ash Pond

Material	Unit Weight (pcf)	Effective (drained) Shear Strength Parameters		Total (undrained) Shear Strength Parameters	
		c' (psf)	Φ' (°)	c (psf)	Φ (°)
Alluvial Foundation	135	0	38	0	38

§ 257.73(c)(1)(vi): A statement of the type, size, range, and physical and engineering properties of the materials used in constructing each zone or stage of the CCR unit; the method of site preparation and construction of each zone of the CCR unit; and the approximate dates of construction of each successive stage of construction of the CCR unit.

Physical properties of the embankment materials for the Old West Polishing Pond and Old West Ash Pond are described as gravel with occasional zones of clayey sand and lean clay. The gravel has a general relative density of very dense. An available summary of the engineering properties of the embankment materials for the Old West Polishing Pond and Old West Ash Pond is presented in **Table 1** above. The engineering properties are based on previous geotechnical explorations and laboratory testing.

The physical properties of Ash Pond No. 2 embankment construction materials are described in this paragraph. The original embankments are constructed of sand with varying amounts of coal pieces and gravel. The initial embankment raise is constructed of silty clay, clayey sand, sand, and gravel and the later embankment raise is constructed with layers of lean clay, silty clay, clayey silt, clayey, and gravel. An available summary of the engineering properties of the embankment materials for Ash Pond No. 2 is presented in **Table 3** below. The engineering properties are based on previous geotechnical explorations and laboratory testing.

Table 3. Summary of Construction Material Engineering Properties for Ash Pond No. 2

Material	Unit Weight (pcf)	Effective (drained) Shear Strength Parameters		Total (undrained) Shear Strength Parameters	
		c' (psf)	Φ' (°)	c (psf)	Φ (°)
Fill: GP-GM (medium dense)	125	0	32	0	32
Fill: CL (hard)	120	0	32	4000	0
Fill: ML (hard)	120	0	32	4500	0
Fill: SC (medium dense)	120	0	28	0	28

Physical properties of the embankment materials for the East Ash Pond are described as clayey silt and clay. The consistency of both the clayey silt and clay ranges from stiff to hard. The original pond surface is lined with a 4-foot thick compacted clay layer of 1.0×10^{-7} cm/s underlain by a 1-foot thick sand layer. The liner system of the embankment raise consists of a (from top to bottom) 45 mil reinforced polyethylene geomembrane, a 1-foot thick clay layer, and an 8 oz/sy polypropylene geotextile. A typical cross section profile of the liner system is shown on drawing C-56 presented in **Appendix B**. An available summary of the construction material engineering properties for the East Ash Pond is presented in **Table 4** below. The engineering properties are based on previous geotechnical explorations and laboratory testing.

Table 4. Summary of Construction Material Engineering Properties for the East Ash Pond

Material	Unit Weight (pcf)	Effective (drained) Shear Strength Parameters		Total (undrained) Shear Strength Parameters	
		c' (psf)	Φ' (°)	c (psf)	Φ (°)
Embankment Fill	105	30	32	2500	0
Liner System	120	60	30	2500	0

The method of site preparation and construction of the Old West Polishing Pond, Old West Ash Pond, Ash Pond No. 2, and the original East Ash Pond are not reasonably and readily available. Site preparation and construction of the 2003 East Ash Pond liner raise were completed in accordance with the applicable construction specification (see § 257.73(c)(1)(xi) below).

Reasonably and readily available approximate dates of construction of each successive stage of construction of the Old West Polishing Pond, Old West Ash Pond, Ash Pond No. 2, and East Ash Pond are provided in **Table 5** below.

Table 5. Approximate dates of construction of each successive stage of construction.

Date	Event
1951 to 1952	Construction of historical Ash Pond No. 1
1958	Construction of Ash Pond No. 2
Late 1960's	Construction of historical Ash Pond No. 3
1978	Embankment raise of Ash Pond No. 2
1985	Embankment raise of Ash Pond No. 2 to elevation 484 feet and Ash Pond No. 3 (Old West Ash Pond) to elevation 460 feet
1988 to 1989	Embankment raise of Old West Ash Pond to elevation 465 feet that merged historical Ash Pond No. 1 and Ash Pond No. 3 into one single pond and created the Old West Polishing Pond
1989	Embankment raise of Ash Pond No. 2 to elevation 494 feet
1995 to 1996	Construction of East Ash Pond
2003	Embankment liner raise of East Ash Pond
2009 to 2010	Eastern portion of Ash Pond No. 2 was removed to facilitate construction of the Leachate Pond
2011	Landfill Cell 1 was constructed over placed CCR in Ash Pond No. 2 adjacent to the Leachate Pond
2014	North Embankment tree removal, grading, and vegetation re-establishment of Ash Pond No. 2

§ 257.73(c)(1)(vii): At a scale that details engineering structures and appurtenances relevant to the design, construction, operation, and maintenance of the CCR unit, detailed dimensional drawings of the CCR unit, including a plan view and cross sections of the length and width of the CCR unit, showing all zones, foundation improvements, drainage provisions, spillways, diversion ditches, outlets, instrument locations, and slope protection, in addition to the normal operating pool surface elevation and the maximum pool surface elevation following peak discharge from the inflow design flood, the expected maximum depth of CCR within the CCR surface impoundment, and any identifiable natural or manmade features that could adversely affect operation of the CCR unit due to malfunction or mis-operation.

Drawings that contain items pertaining to the requested information for the Old West Polishing Pond, Old West Ash Pond, Ash Pond No. 2, and East Ash Pond are listed in **Table 6** below. Items marked as "Not Available" are items not found during a review of the reasonably and readily available record documentation.

Table 6. List of drawings containing items pertaining to the information requested in § 257.73(c)(1)(vii).

	Old West Polishing Pond	Old West Ash Pond	Ash Pond No. 2	East Ash Pond
Dimensional plan view (all zones)	HEN1-B460-2	HEN1-B460-1 to 2	HEN1-B461, HEN1-C117	HEN1-C55
Dimensional cross sections	HEN1-B452 to B457	HEN1-B452 to B457	HEN1-B458-1 to 7, Berm Modification Drawings 7 to 9	HEN1-C56 to C59
Foundation Improvements	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Drainage Provisions	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Spillways and Outlets	Not Available	Not Available	Not Applicable	HEN1-C8 to C9, HEN1-C109, HEN1-C113
Diversion Ditches	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Instrument Locations	Figure 2D	Figure 2C	Figure 2A	Figure 2B
Slope Protection	Not Available	Not Available	Berm Modification Drawings 3 to 9	HEN1-C56 to C59
Normal Operating Pool Elevation	Not Available	Not Available	Not Available	Not Available
Maximum Pool Elevation	Not Available	Not Available	Not Available	Not Available
Approximate Maximum Depth of CCR in 2016	11 feet	15 feet	46 feet	35 feet

All drawings referenced in **Table 6** above can be found in **Appendix B** and **Appendix C**.

Based on the review of the drawings listed above, no natural or manmade features that could adversely affect operation of these CCR units due to malfunction or mis-operation were identified.

§ 257.73(c)(1)(viii): A description of the type, purpose, and location of existing instrumentation.

Existing instrumentation consists of open-standpipe piezometers installed in 2015. The purpose of the piezometers is to measure the pore water pressures within the embankments of the Old West Polishing Pond, Old West Ash Pond, Ash Pond No. 2, and East Ash Pond. There are seven (7) existing piezometers within the Old West Polishing Pond, Old West Ash Pond, Ash Pond No. 2, and East Ash Pond. A location map of the existing instrumentation is presented in **Appendix C**.

§ 257.73(c)(1)(ix): Area-capacity curves for the CCR unit.

Area-capacity curves for the Old West Polishing Pond, Old West Ash Pond, Ash Pond No. 2, and East Ash Pond are not reasonably and readily available.

§ 257.73(c)(1)(x): A description of each spillway and diversion design features and capacities and calculations used in their determination.

The Old West Polishing Pond contains a 24-inch diameter corrugated metal pipe (CMP) outlet that discharges stormwater to the Illinois River in accordance with the station's NPDES permit. Current capacity and calculation information for the Old West Polishing Pond's discharge capability is not reasonably and readily available.

The Old West Ash Pond contains a 24-inch dia. pipe culvert. Stormwater collected within the CCR unit drains via surface flow and through the pipe culvert into the Old West Polishing Pond. Current capacity and calculation information for the Old West Ash Pond's discharge capability is not reasonably and readily available.

The Ash Pond No. 2 does not contain a spillway or diversion feature. Stormwater collected within the CCR unit drains via surface flow into the East Ash Pond. Current capacity and calculation information for the Ash Pond No. 2's discharge capability is not reasonably and readily available.

The East Ash Pond contains two outlet structures. The southeast outlet is a 5-foot wide stop-log structure that is connected to a 36-inch diameter reinforced concrete pipe (RCP). The 36-inch diameter RCP discharges into the East Polishing Pond. The northeast outlet, located on the northeast corner of the East Ash Pond, is a headwall structure connected to an 18-inch diameter RCP. The 18-inch diameter RCP discharges into the East Leachate Pond. In 2016, the discharge capacity of the East Ash Pond was evaluated using HydroCAD 10 software modeling a 1,000-year, 24-hour rainfall event. The model results indicate that the East Ash Pond has enough storage capacity and will not overtop the embankment during the 1,000-year, 24-hour storm event. The results of the HydroCAD 10 analysis are presented below in **Table 7**.

Table 7. Results of HydroCAD 10 analysis

	East Ash Pond
Approximate Minimum Berm Elevation¹ (ft)	493.0
Approximate Emergency Spillway Elevation¹ (ft)	Not Applicable
Starting Pool Elevation¹ (ft)	490.4
Peak Elevation¹ (ft)	492..2
Time to Peak (hr)	12.5
Surface Area (ac)	6.5
Storage² (ac-ft)	8.4

Note: 1. Elevations are based on NAVD88 datum
 2. Storage given is from Starting Pool Elevation to Peak Elevation.

§ 257.73(c)(1)(xi): The construction specifications and provisions for surveillance, maintenance, and repair of the CCR unit.

The construction specifications for Old West Polishing Pond, Old West Ash Pond, Ash Pond No. 2, and the original East Ash Pond are not reasonably and readily available. The construction specification for the 2003 East Ash Pond liner raise is located in *Specification J-2616, Rev. A* (presented in **Appendix D**).

The provisions for surveillance, maintenance, and repair of the Old West Polishing Pond and Old West Ash Pond are located in *Hennepin Power Station; West Ash Disposal Pond Maintenance Plan* (2013) (presented in **Appendix E**). The provisions for surveillance, maintenance, and repair of Ash Pond No. 2 are located in *Hennepin Power Station; Old East Ash Disposal Pond Maintenance Plan* (2013) (presented in **Appendix F**). The provisions for surveillance, maintenance, and repair of the East Ash Pond are located in *Hennepin Power Station; East Ash Disposal Pond Maintenance Plan* (2014) (presented in **Appendix G**).

The operations and maintenance plans for the Old West Polishing Pond, Old West Ash Pond, Ash Pond No. 2, and East Ash Pond are currently being revised by Dynegy Midwest Generation, LLC.

§ 257.73(c)(1)(xii): Any record or knowledge of structural instability of the CCR unit.

There is no record or knowledge of structural instability of the Old West Polishing Pond, Old West Ash Pond, Ash Pond No. 2, and East Ash Pond at the Hennepin Power Station.

LIMITATIONS

The signature of AECOM's authorized representative on this document represents that to the best of AECOM's knowledge, information and belief in the exercise of its professional judgment, it is AECOM's professional opinion that the aforementioned information is accurate as of the date of such signature. Any recommendation, opinion or decisions by AECOM are made on the basis of AECOM's experience, qualifications and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data and that actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

Sincerely,



Claudia Prado
Project Manager



Victor Modeer, P.E., D.GE
Senior Project Manager

REFERENCES

United States Environmental Protection Agency (USEPA). (2015). *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule*. 40 CFR Parts 257 and 261, 80 Fed. Reg. 21302, 21380 April 17, 2015.

United States Geological Survey (USGS). (2016). The National Map Viewer. <http://viewer.nationalmap.gov/viewer/>. USGS data first accessed in March of 2016.

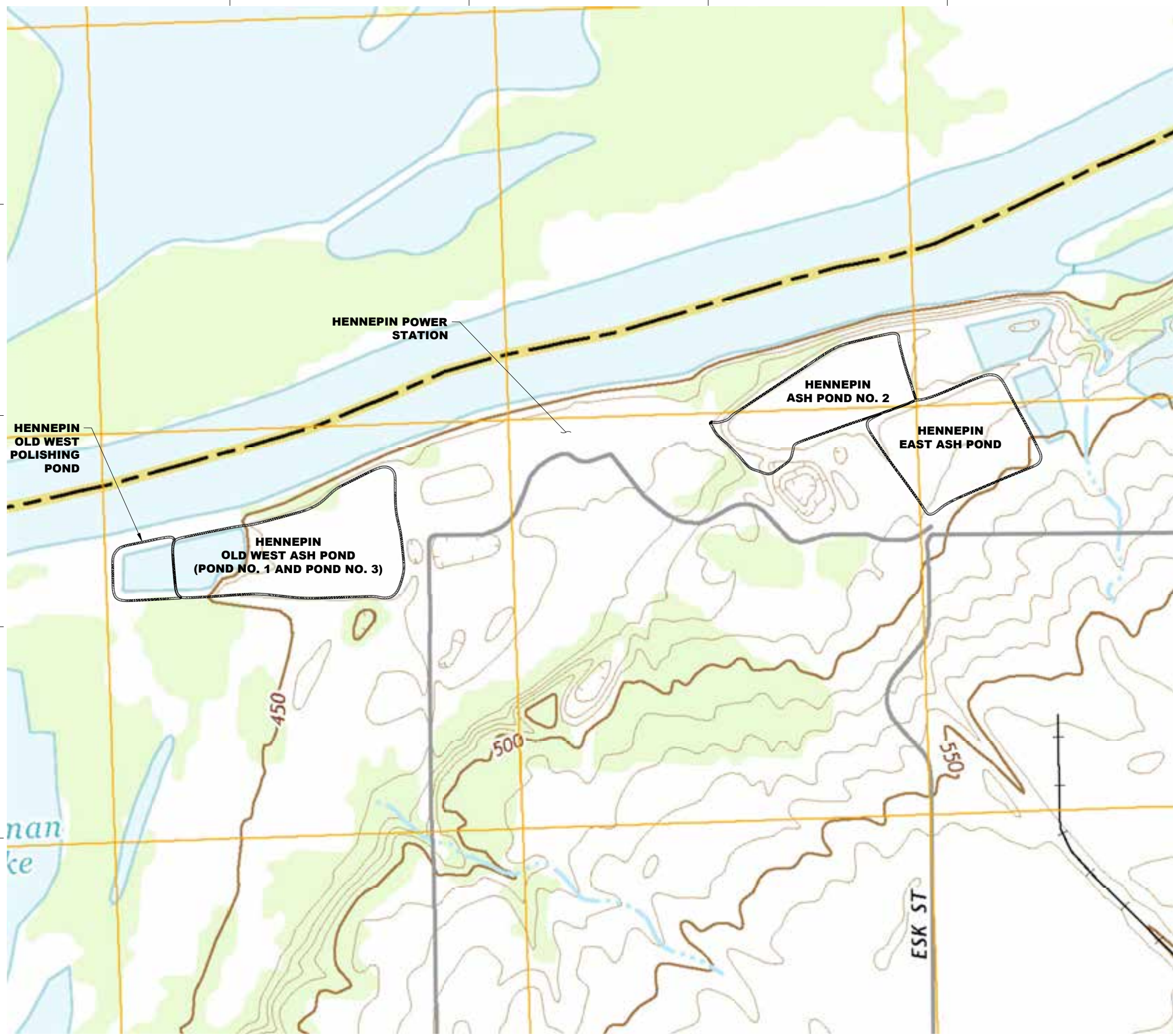
APPENDICES

- Appendix A: History of Construction Vicinity Map
- Appendix B: Hennepin Power Station Drawings
- Appendix C: Hennepin Power Station Piezometer Locations
- Appendix D: Specification J-2616, Rev. A, Primary Ash Pond Modifications
- Appendix E: Hennepin Power Station; West Ash Disposal Pond Maintenance Plan (2013)
- Appendix F: Hennepin Power Station; Old East Ash Disposal Pond Maintenance Plan (2013)
- Appendix G: Hennepin Power Station; East Ash Disposal Pond Maintenance Plan (2014)



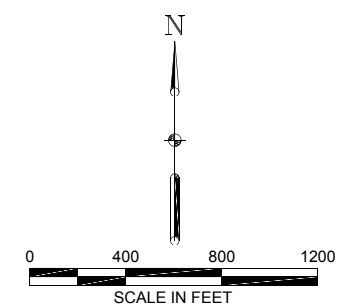
Appendix A: History of Construction Vicinity Map

AECOM DRAWING PATH: P:\Projects\Geotech\60428794_DynergyCCR\13_Construction_History\04_Technical_Production\4_Hennepin\Reference_Documents\Vicinity_Map\History_of_Construction_Vicinity_Map_(Hennepin) - MUN.dwg
 NAVWK, MAT, 9/28/2016 4:11 PM



LEGEND
 CCR UNITS

SOURCE:
 MAP PROVIDED FROM ELECTRONIC
 USGS DIGITAL RASTER GRAPHIC 7.5
 MINUTE TOPOGRAPHIC MAP OF DEPUE
 ILLINOIS, REVISED 2015.



1001 Highlands Plaza Drive, Suite 300
 St. Louis, Mo. 63110
 314 429-0100 (phone)
 314 429-0462 (fax)

**DYNEGY MIDWEST
 GENERATION, L.L.C.**
 13498 East 800th Street
 Hennepin, IL 61327

**HISTORY OF
 CONSTRUCTION**
 HENNEPIN POWER STATION
 HENNEPIN, ILLINOIS

ISSUED FOR BIDDING _____ DATE BY _____

ISSUED FOR CONSTRUCTION _____ DATE BY _____

REVISIONS		
NO.	DESCRIPTION	DATE
△		
△		
△		
△		
△		

AECOM PROJECT NO: 60489731
 DRAWN BY: DJD
 DESIGNED BY: DJD
 CHECKED BY: MN
 DATE CREATED: 2016-04-13
 PLOT DATE:
 SCALE: 1" = 400'
 ACAD VER: 2014

SHEET TITLE
**HISTORY OF
 CONSTRUCTION
 VICINITY MAP**

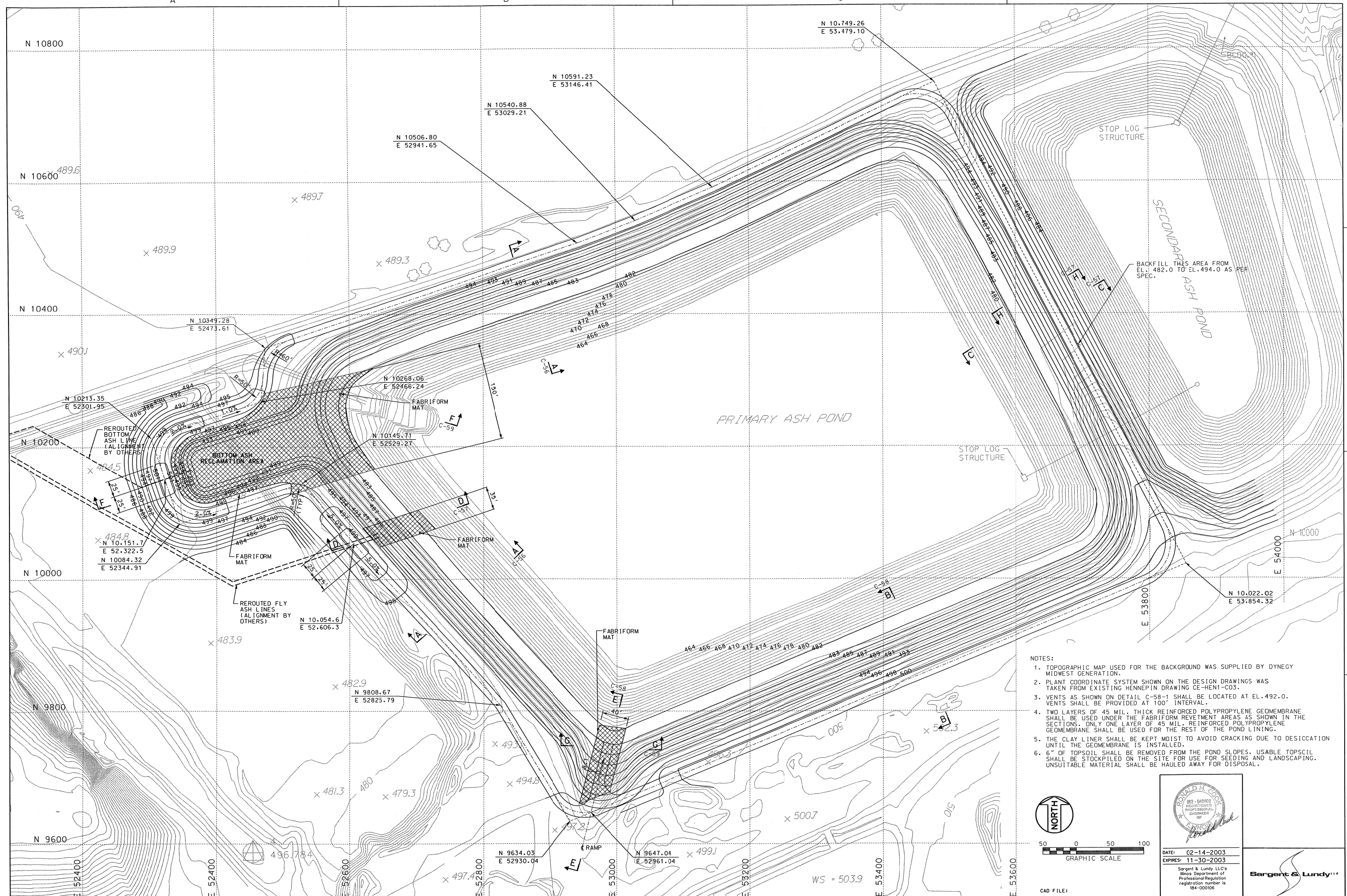
Appendix B: Hennepin Power Station Drawings

1. "Plan of Primary Ash Pond, Modification to Primary Ash Pond", Drawing No. C-55, Revision 0.1, 14 February, 2003, Sargent & Lundy, LLC.
2. "Sections and Details – Sheet 1, Modification to Primary Ash Pond", Drawing No. C-56, Revision 0.1, 14 February, 2003, Sargent & Lundy, LLC.
3. "Sections and Details – Sheet 2, Modification to Primary Ash Pond", Drawing No. C-57, Revision 0.1, 14 February, 2003, Sargent & Lundy, LLC.
4. "Sections and Details – Sheet 3, Modification to Primary Ash Pond", Drawing No. C-58, Revision 0.1, 14 February, 2003, Sargent & Lundy, LLC.
5. "Sections and Details – Sheet 4, Modification to Primary Ash Pond", Drawing No. C-59, Revision 0.1, 14 February, 2003, Sargent & Lundy, LLC.
6. "Cross Sections of Ash Pond Berm Extension, Sta 1+00, 5+00 & 9+50", Drawing No. E-HEN1-B452, Revision 0, 4 November, 1997, Illinois Power Company.
7. "Cross Sections of Ash Pond Berm Extension, Sta 14+25, 20+80 & 26+00", Drawing No. E-HEN1-B453, Revision 0, 4 November, 1997, Illinois Power Company.
8. "Cross Sections of Ash Pond Berm Extension, Sta 30+00, 35+00 & 39+00", Drawing No. E-HEN1-B454, Revision 0, 4 November, 1997, Illinois Power Company.
9. "Cross Sections of Ash Pond Berm Extension, Sta 40+00, 42+00, 44+90", Drawing No. E-HEN1-B455, Revision 0, 4 November, 1997, Illinois Power Company.
10. "Cross Sections of Ash Pond Berm Extension, Sta 47+00, 51+00 & 56+00", Drawing No. E-HEN1-B456, Revision 0, 4 November, 1997, Illinois Power Company.
11. "Cross Sections of Ash Pond Berm Extension, Sta 61+50", Drawing No. E-HEN1-B457, Revision 0, 4 November, 1997, Illinois Power Company.
12. "Cross Sections, East Ash Pond Extension", Drawing No. E-HEN1-B458-1, Revision 0, 8 March, 1990, Illinois Power Company.
13. "Cross Sections, East Ash Pond Extension", Drawing No. E-HEN1-B458-2, Revision 0, 8 March, 1990, Illinois Power Company.
14. "Cross Sections, East Ash Pond Extension", Drawing No. E-HEN1-B458-3, Revision 0, 8 March, 1990, Illinois Power Company.
15. "Cross Sections, East Ash Pond Extension", Drawing No. E-HEN1-B458-4, Revision 0, 8 March, 1990, Illinois Power Company.
16. "Cross Sections, East Ash Pond Extension", Drawing No. E-HEN1-B458-5, Revision 0, 8 March, 1990, Illinois Power Company.
17. "Cross Sections, East Ash Pond Extension", Drawing No. E-HEN1-B458-6, Revision 0, 8 March, 1990, Illinois Power Company.
18. "Cross Sections, East Ash Pond Extension", Drawing No. E-HEN1-B458-7, Revision 0, 8 March, 1990, Illinois Power Company.
19. "Plan-Unit #1 Ash Pond Extension, Sheet #1", Drawing No. E-HEN1-B460-1, 2 February, 1988, Illinois Power Company.
20. "Plan-Unit #1 Ash Pond Extension, Sheet #2", Drawing No. E-HEN1-B460-2, 2 February, 1988, Illinois Power Company.

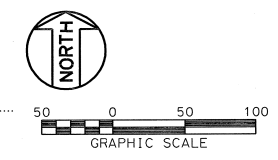


Appendix B: Hennepin Power Station Drawings (continued)

21. "Contour and Grading Plan, Unit #2 Ash Pond Extension", Drawing No. CE-HEN1-B461, Revision 0, 8 March, 1990, Illinois Power Company.
22. "Pond 2 East, Flexible Membrane Liner and Structures", Drawing No. HEN1-C109, Revision 0, 28 July, 2010, Civil & Environmental Consultants, Inc.
23. "Pond 2 East, Details", Drawing No. HEN1-C113, Revision 0, 28 July, 2010, Civil & Environmental Consultants, Inc.
24. "Landfill Phase 1 Construction, Existing Conditions", Drawing No. HEN1-C117, Revision 0, 28 November, 2010, Civil & Environmental Consultants, Inc.
25. "Layout-Pond Discharge Structures, 1995 Ash Facility", Drawing No. CE-HEN1-C8, Revision 0, 17 September, 1996, Illinois Power Company.
26. "Details: Pond Discharge Structure, 1995 Ash Facility", Drawing No. CE-HEN1-C9, Revision 0, 17 September, 1996, Illinois Power Company.
27. "East Berm Modification, Existing Site Conditions", Drawing No. 3, Revision 3, 4 February, 2015, Civil & Environmental Consultants, Inc.
28. "East Berm Modification, Proposed Site Plan", Drawing No. 4, Revision 3, 4 February, 2015, Civil & Environmental Consultants, Inc.
29. "East Berm Modification, Proposed Grading Plan 1 of 2", Drawing No. 5, Revision 3, 4 February, 2015, Civil & Environmental Consultants, Inc.
30. "East Berm Modification, Proposed Grading Plan 2 of 2", Drawing No. 6, Revision 3, 4 February, 2015, Civil & Environmental Consultants, Inc.
31. "East Berm Modification, Proposed Sections Sta 1+00 to 15+00", Drawing No. 7, Revision 3, 4 February, 2015, Civil & Environmental Consultants, Inc.
32. "East Berm Modification, Proposed Sections Sta 16+00 to 23+50", Drawing No. 8, Revision 3, 4 February, 2015, Civil & Environmental Consultants, Inc.
33. "East Berm Modification, Berm and Erosion Control Details", Drawing No. 9, Revision 3, 4 February, 2015, Civil & Environmental Consultants, Inc.



- NOTES:
1. TOPOGRAPHIC MAP USED FOR THE BACKGROUND WAS SUPPLIED BY DYNEGY MIDWEST GENERATION.
 2. PLANT COORDINATE SYSTEM SHOWN ON THE DESIGN DRAWINGS WAS TAKEN FROM EXISTING HENNEPIN DRAWING CE-HEN1-C03.
 3. VENTS AS SHOWN ON DETAIL C-58-1 SHALL BE LOCATED AT EL. 492.0. VENTS SHALL BE PROVIDED AT 100' INTERVAL.
 4. TWO LAYERS OF 45 MIL. THICK REINFORCED POLYPROPYLENE GEOMEMBRANE SHALL BE USED UNDER THE FABRIFORM REVETMENT AREAS AS SHOWN IN THE SECTIONS. ONLY ONE LAYER OF 45 MIL. REINFORCED POLYPROPYLENE GEOMEMBRANE SHALL BE USED FOR THE REST OF THE POND LINING.
 5. THE CLAY LINER SHALL BE KEPT MOIST TO AVOID CRACKING DUE TO DESICCATION UNTIL THE GEOMEMBRANE IS INSTALLED.
 6. 6" OF TOPSOIL SHALL BE REMOVED FROM THE POND SLOPES. USABLE TOPSOIL SHALL BE STOCKPILED ON THE SITE FOR USE FOR SEEDING AND LANDSCAPING. UNSUITABLE MATERIAL SHALL BE HAULED AWAY FOR DISPOSAL.



DATE: 02-14-2003
 EXPIRES: 11-30-2003
 Sargent & Lundy LLC's
 Illinois Department of
 Professional Regulation
 registration number is
 184-000106



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NO.	DATE	REVISION	PREP'D	REV'D	APPR'D	NO.	DATE	REVISION	PREP'D	REV'D	APPR'D
D.1	02-14-2003	FOR PERMIT	MED	VP							

NO.	DATE	REVISION	PREP'D	REV'D	APPR'D	NO.	DATE	REVISION	PREP'D	REV'D	APPR'D

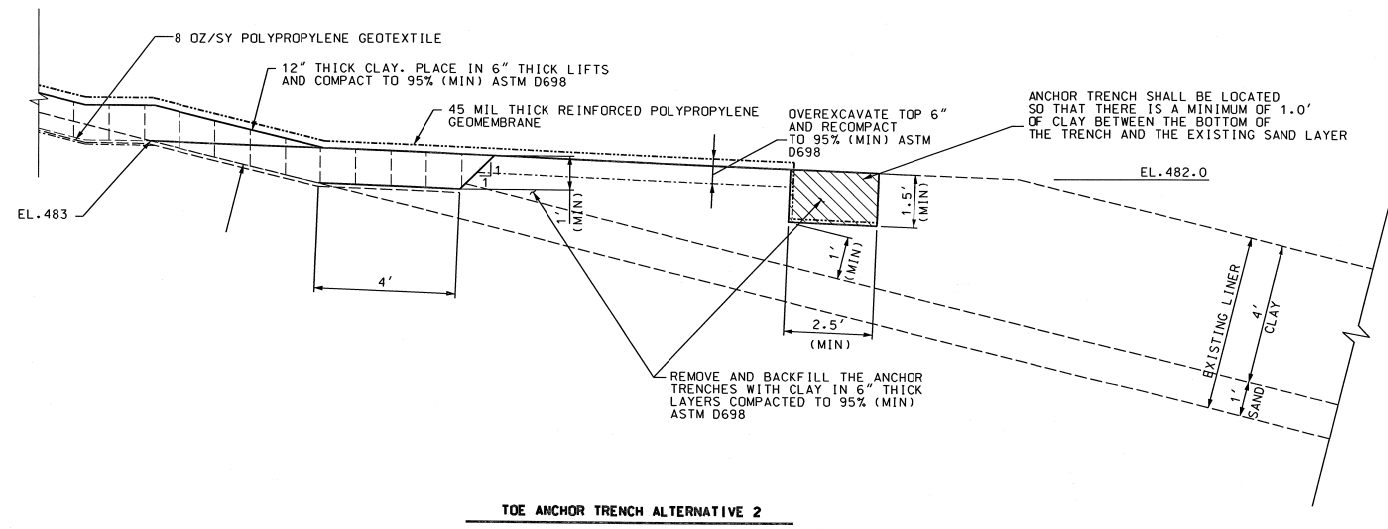
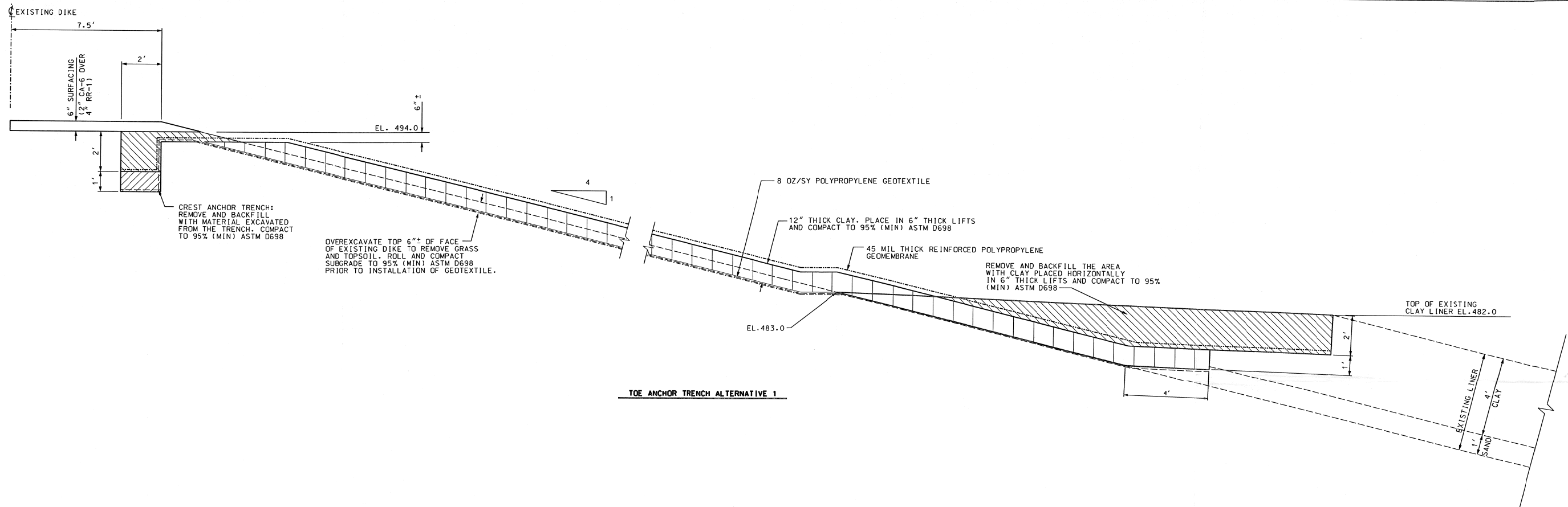
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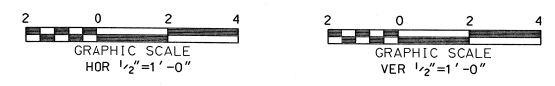
PLAN OF PRIMARY ASH POND
 MODIFICATION TO PRIMARY ASH POND
 HENNEPIN POWER STATION

PROJECT NO.: 08820-331
 CLIENT: DYNEGY MIDWEST GENERATION
 DWG. NO.: C-55
 REV. 0.1

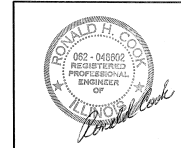
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SECTION A
SEE DWG C-55



- NOTES:
1. CONTRACTOR SHALL BE RESPONSIBLE FOR CHECKING EXISTING ELEVATIONS AND DIMENSIONS PRIOR TO FABRICATION OF THE GEOMEMBRANE LINER.
 2. CONTRACTOR MAY USE EITHER ALTERNATIVE 1 OR ALTERNATIVE 2 AS APPROVED BY THE BUYER FOR ALL TOE ANCHOR TRENCH DETAILS.
 3. DIMENSIONS WERE TAKEN FROM TYPICAL SECTION ON DRAWING CH-HEN1-C6.1 DATED 12-9-93.



DATE: 02-14-2003
EXPIRES: 11-30-2003
Sargent & Lundy LLC's Illinois Department of Professional Regulation registration number is 184-000106



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REFERENCE DRAWINGS

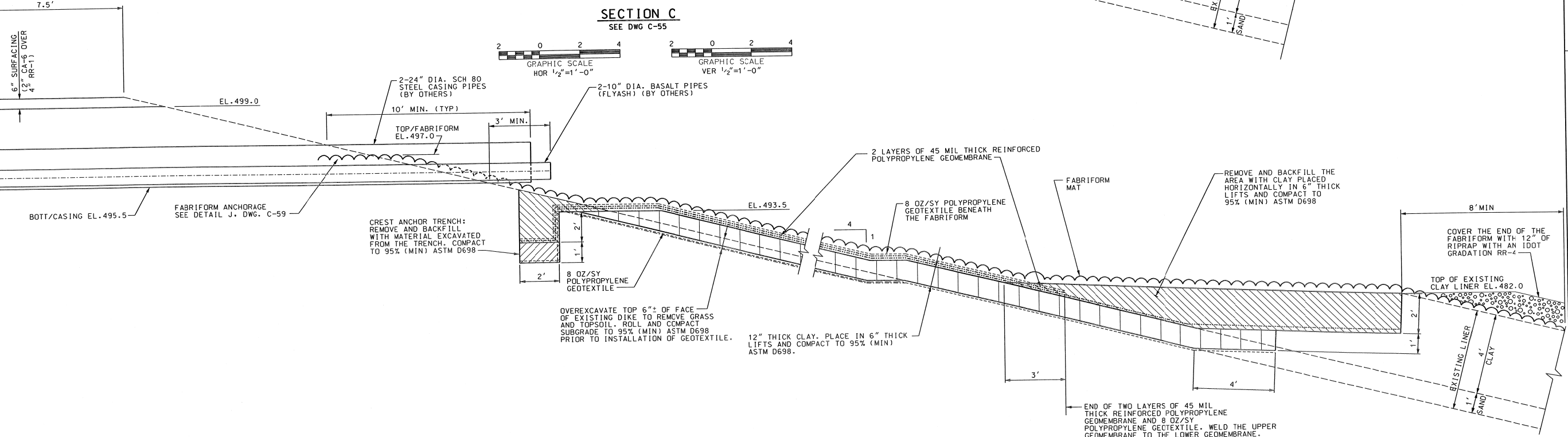
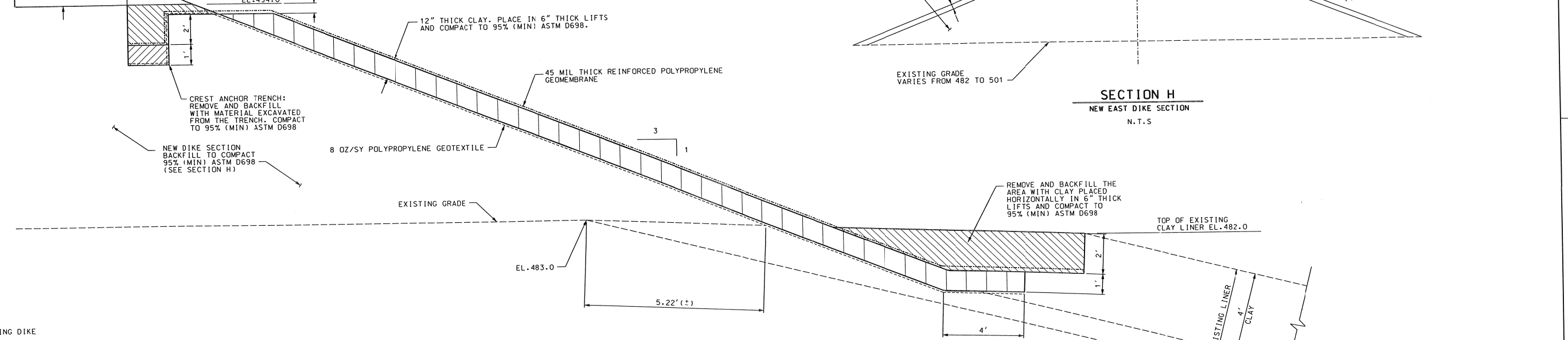
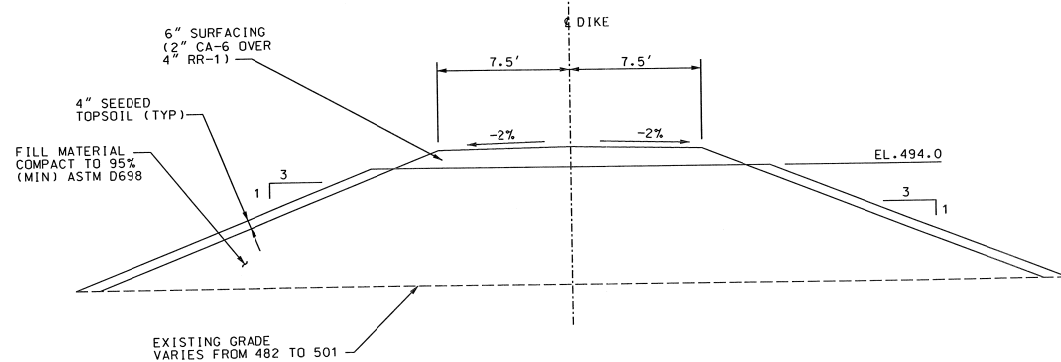
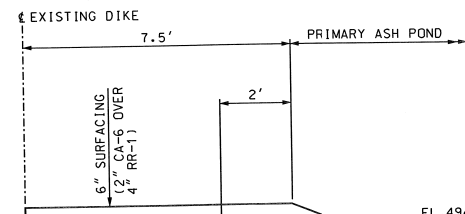
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NO.	DATE	REVISION	PREP'D	REV'D	APPR'D	NO.	DATE	REVISION	PREP'D	REV'D	APPR'D

SCALE:	DATE
DWN. M. DOWNS	02-12-02
CHK. V. PATEL	02-14-03
APPV.	

DYNEGY
SECTIONS AND DETAILS - SHEET 1
MODIFICATION TO PRIMARY ASH POND
HENNEPIN POWER STATION

PROJECT NO.: 08820-331
CLIENT: DYNEGY MIDWEST GENERATION
DWG. NO.: C-56
REV. NO.: 0.1



SECTION C
SEE DWG C-55

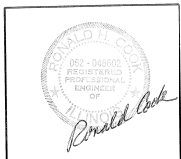
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HOR 1/2"=1'-0"

GRAPHIC SCALE
VER 1/2"=1'-0"

SECTION D
SEE DWG C-55

GRAPHIC SCALE
HOR 1/2"=1'-0"

GRAPHIC SCALE
VER 1/2"=1'-0"



DATE: 02-14-2003
EXPIRES: 11-30-2003

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Professional Regulation
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0.1	02-14-2003	FOR PERMIT	MED	VP							

DYNEGY

SECTIONS AND DETAILS - SHEET 2

MODIFICATION TO PRIMARY ASH POND
HENNEPIN POWER STATION

PROJECT NO.: 08820-331
CLIENT: DYNEGY MIDWEST GENERATION
DWG. NO.: C-57

REV. 0.1

02-13-03 ALS

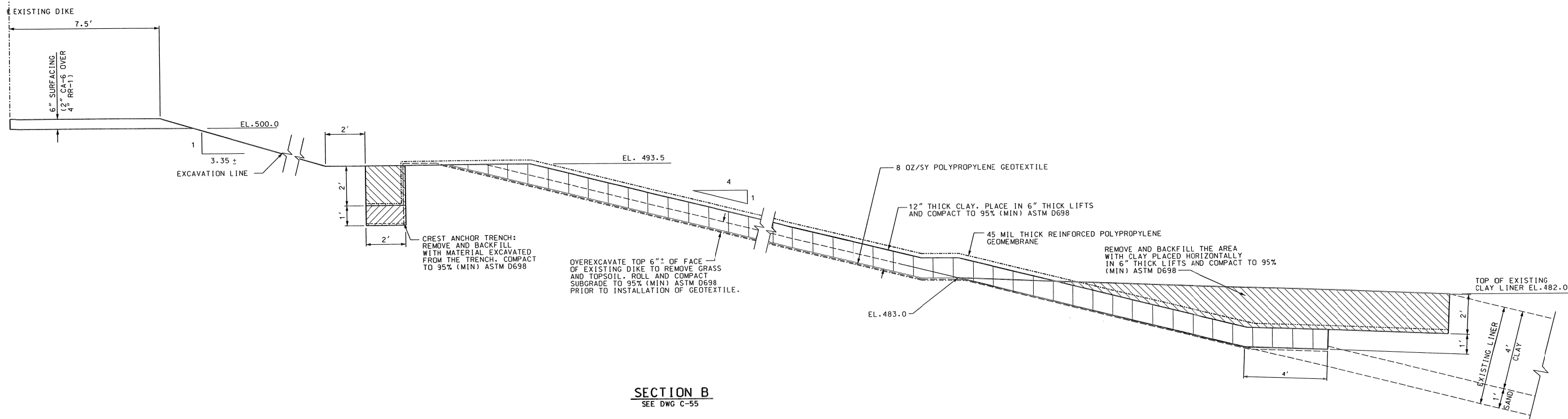
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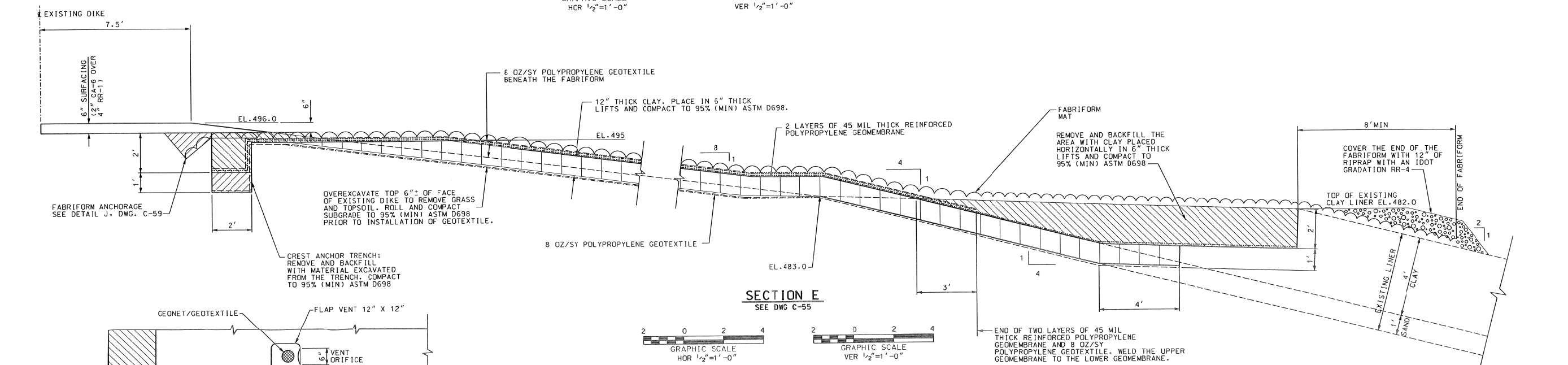
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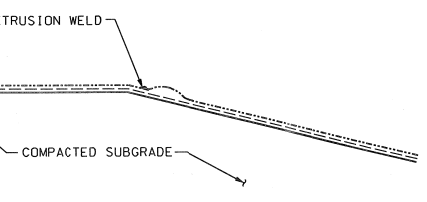
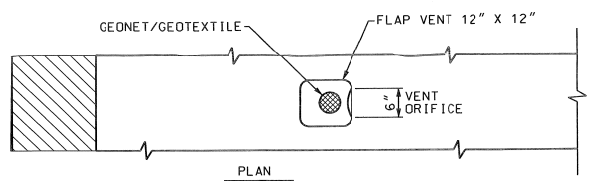
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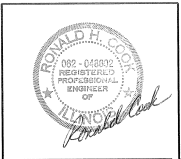
SECTION B
SEE DWG C-55



SECTION E
SEE DWG C-55



SECTION
DETAIL C-58-1
MAXIMUM INTERVAL SHALL BE 100'



DATE: 02-14-2003
EXPIRES: 11-30-2003

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Illinois Department of
Professional Regulation
registration number is
184-000106



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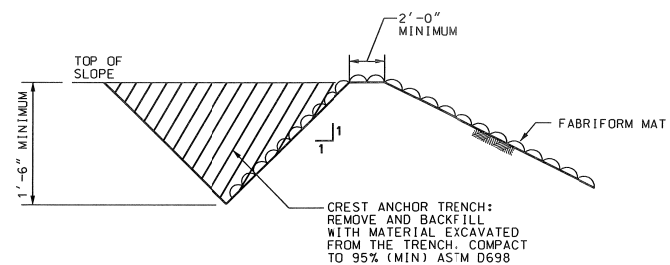
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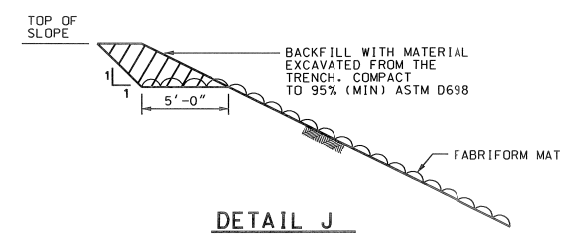
SECTIONS AND DETAILS - SHEET 3
MODIFICATION TO PRIMARY ASH POND
HENNEPIN POWER STATION

PROJECT NO.:	08820-331
CLIENT:	DYNEGY MIDWEST GENERATION
DWG. NO.:	C-58
REV.:	0.1

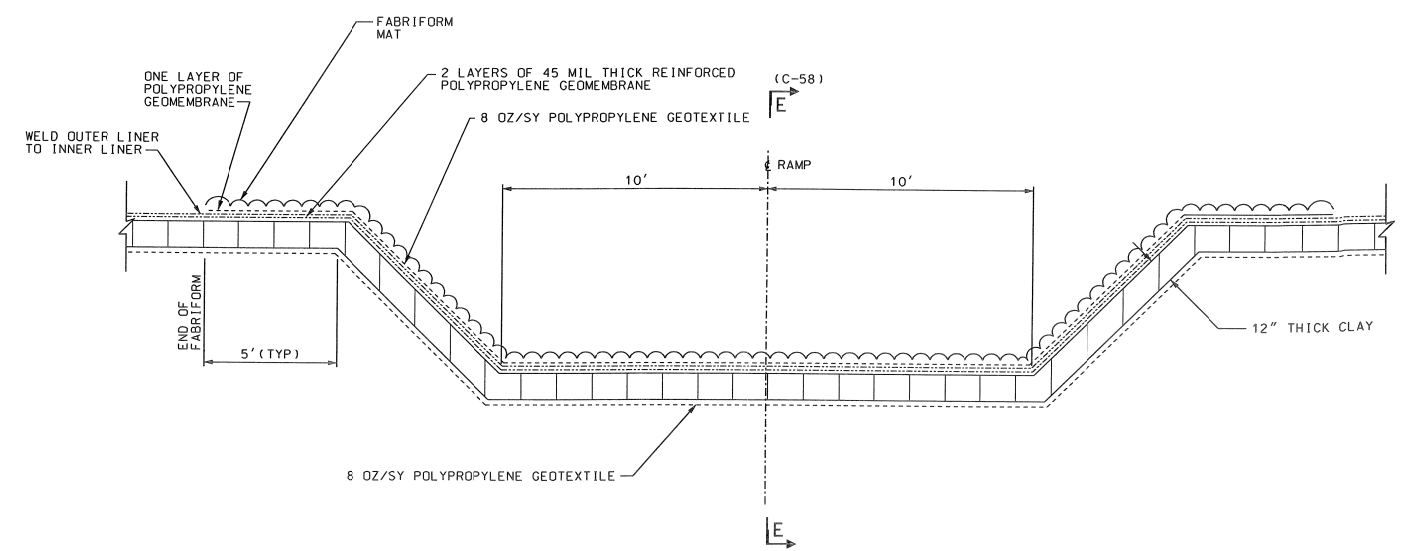
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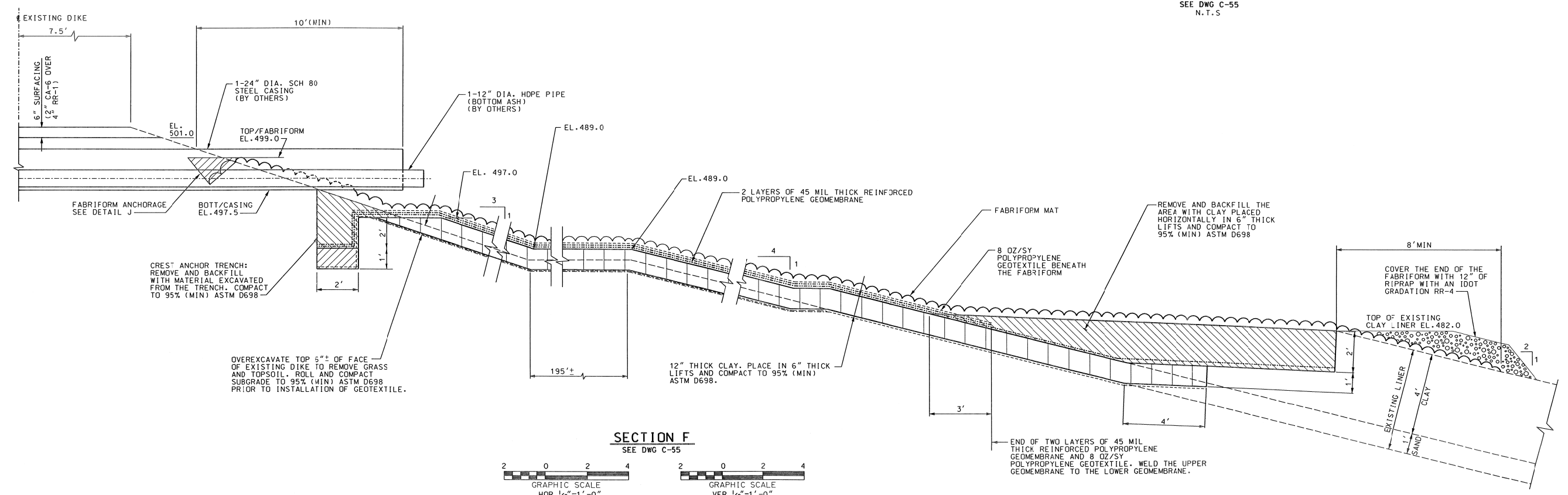
ANCHORAGE IF PROTECTION IS PROVIDED TO THE TOP OF THE SLOPE



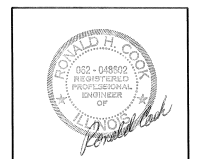
DETAIL J
ANCHORAGE FOR FABRIFORM MAT
N.T.S.



SECTION G
SEE DWG C-55
N.T.S.



SECTION F
SEE DWG C-55



DATE: 02-14-2003
EXPIRES: 11-30-2003
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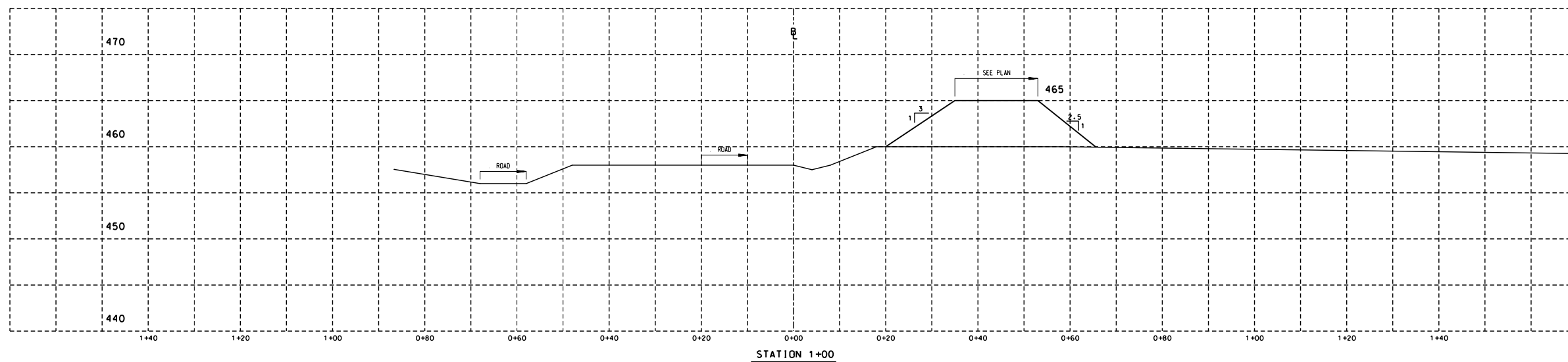
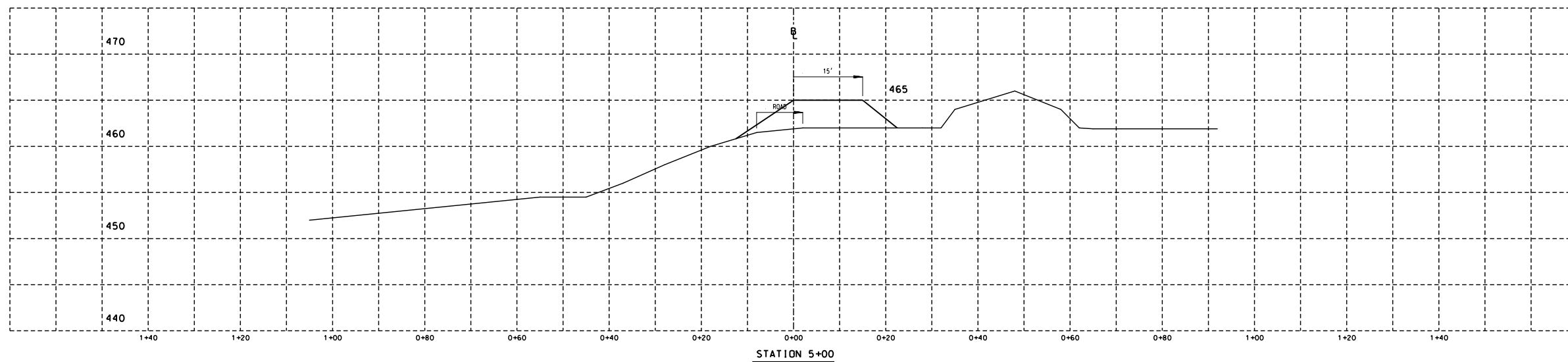
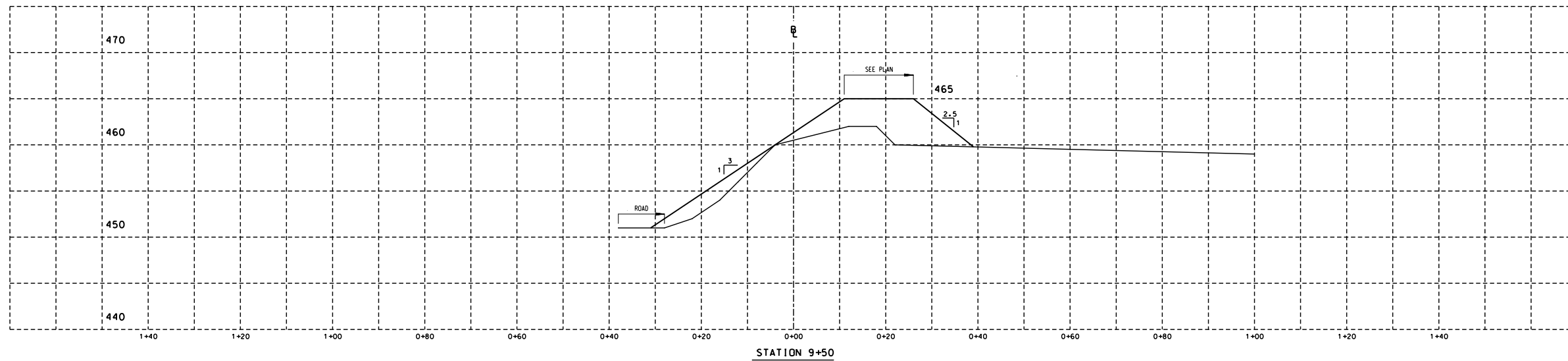
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NO.	DATE	REVISION	PREP'D	REV'D	APPR'D	NO.	DATE	REVISION	PREP'D	REV'D	APPR'D
			MED	VP							

SCALE:	DATE
1/4" = 1'-0"	02-12-02
DWN. M. DOWNS	02-14-03
CHK. V. PATEL	
APPV. DATE	

DYNEGY
SECTIONS AND DETAILS - SHEET 4
MODIFICATION TO PRIMARY ASH POND
HENNEPIN POWER STATION

PROJECT NO.:	08820-331
CLIENT:	DYNEGY MIDWEST GENERATION
DWG. NO.:	C-59
REV. NO.:	0.1

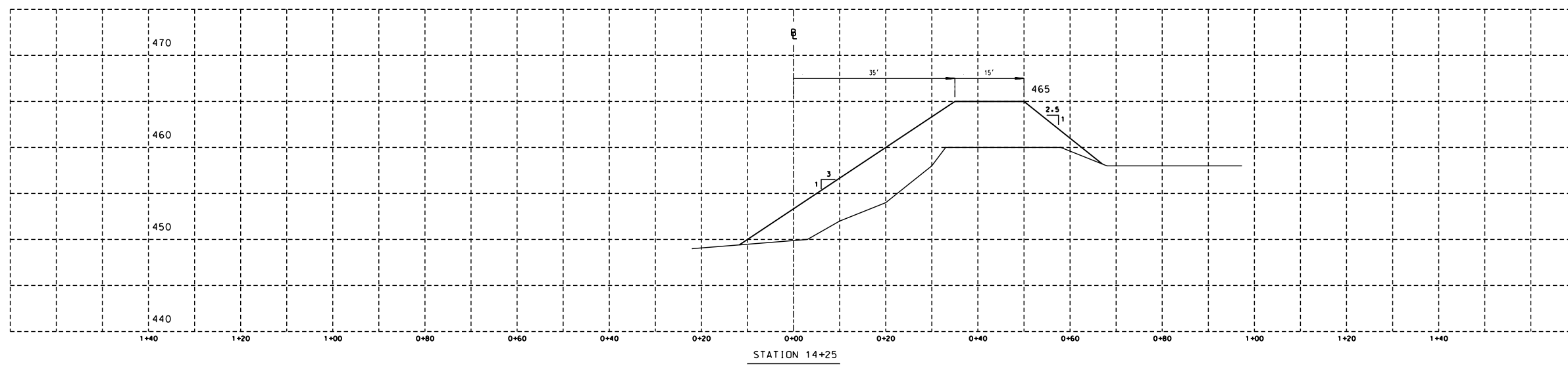
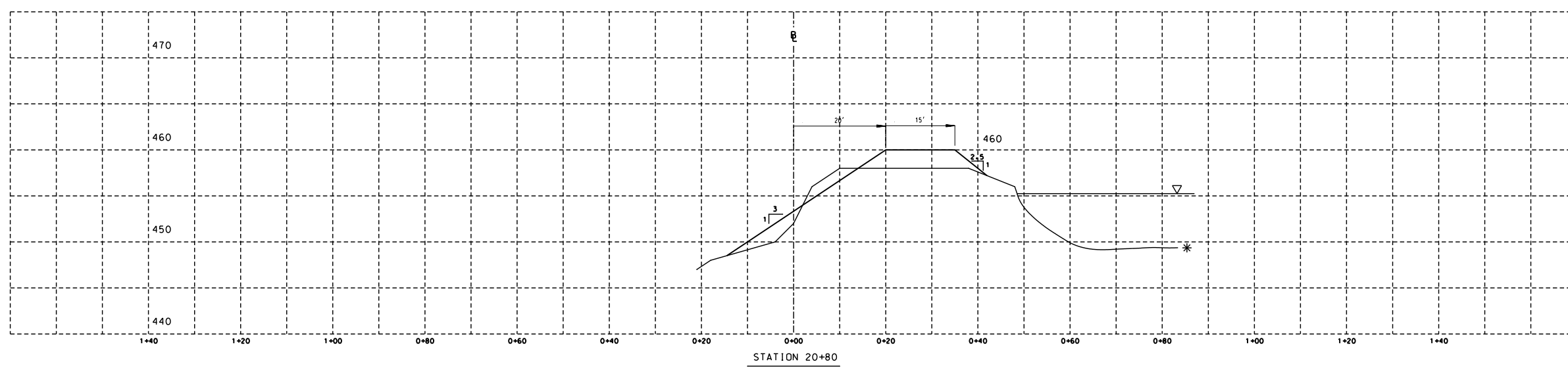
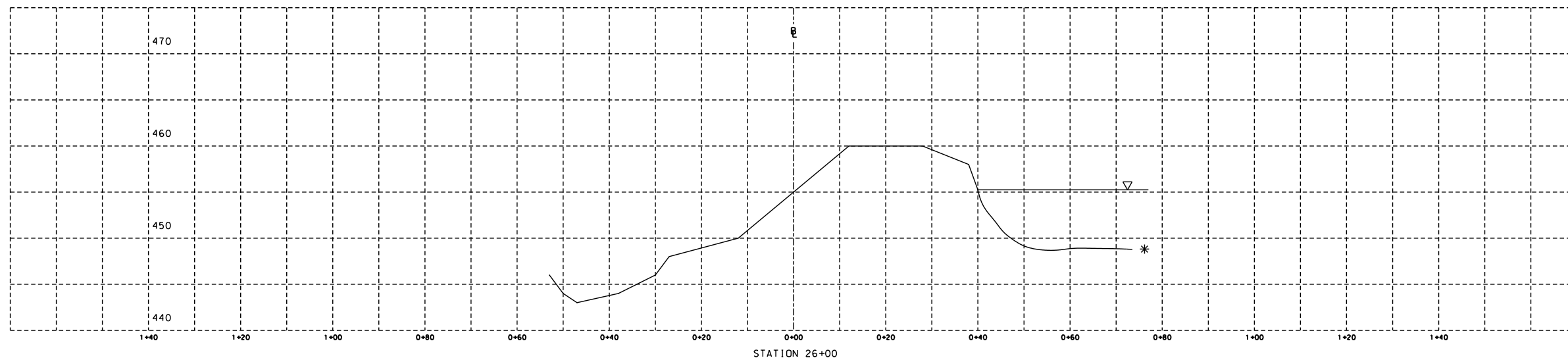


- LEGEND**
- REFERENCE BASE LINE SHOWN ON PLAN
 - OLD BERM
 - NEW BERM
 - WATER LINE
 - ESTIMATED ELEVATION

NO	DATE	DRF	DESCRIPTION	E	C	A	NO	DATE	DRF	DESCRIPTION	E	C	A	NOTES
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2														
3														
4														
5														

ILLINOIS POWER COMPANY DECATUR		
CROSS SECTIONS OF ASH POND BERM EXTENSION STA 1+00, 5+00 & 9+50 HENNEPIN POWER STATION		
DR GRH	CAD EM	DATE 12-30-87
OK	CKD	SCALE 1"=10'H, 1"=5'V
APP	PLOTTED	11-4-97
APP		E-HEN1-B452

E-HEN1-B452

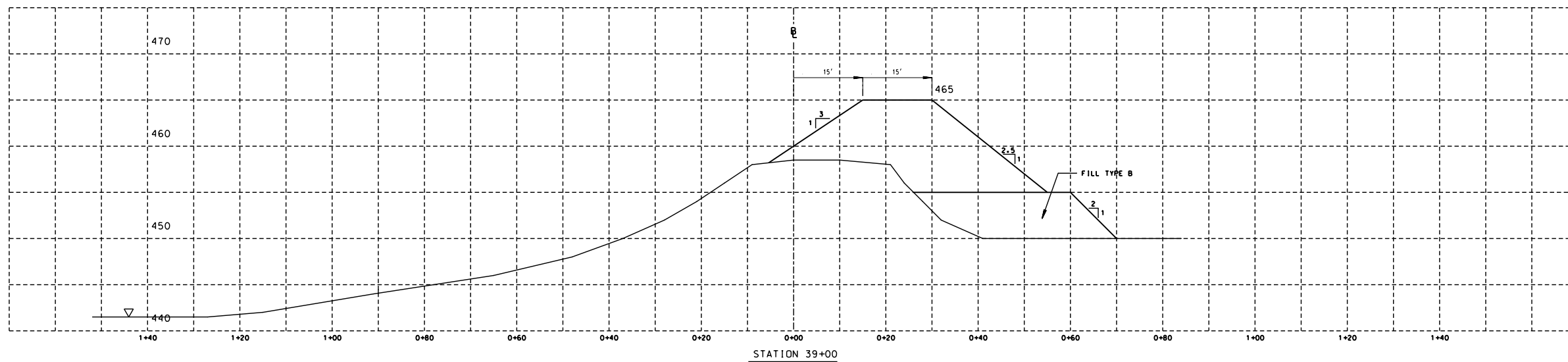


- LEGEND**
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 - OLD BERM
 - NEW BERM
 - WATER LINE
 - ESTIMATED ELEVATION

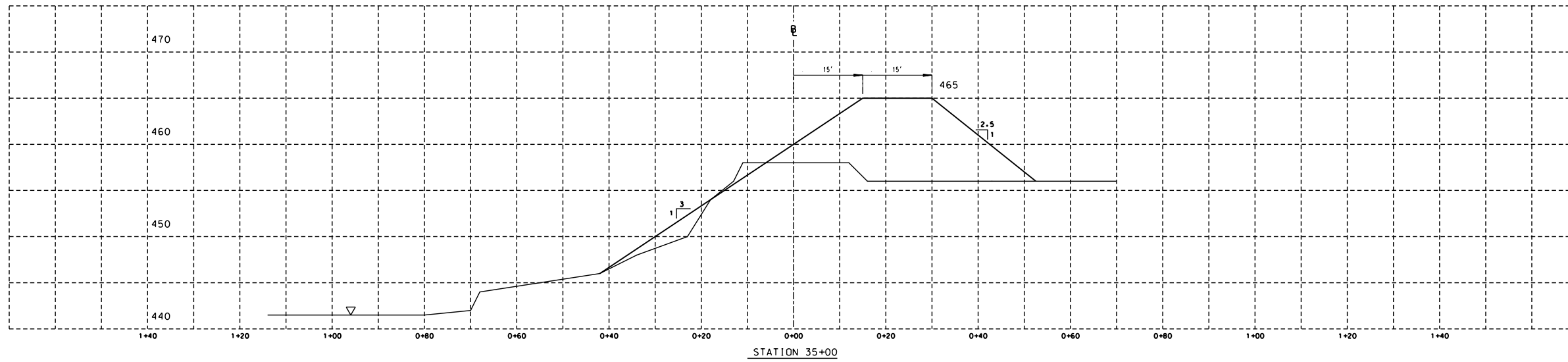
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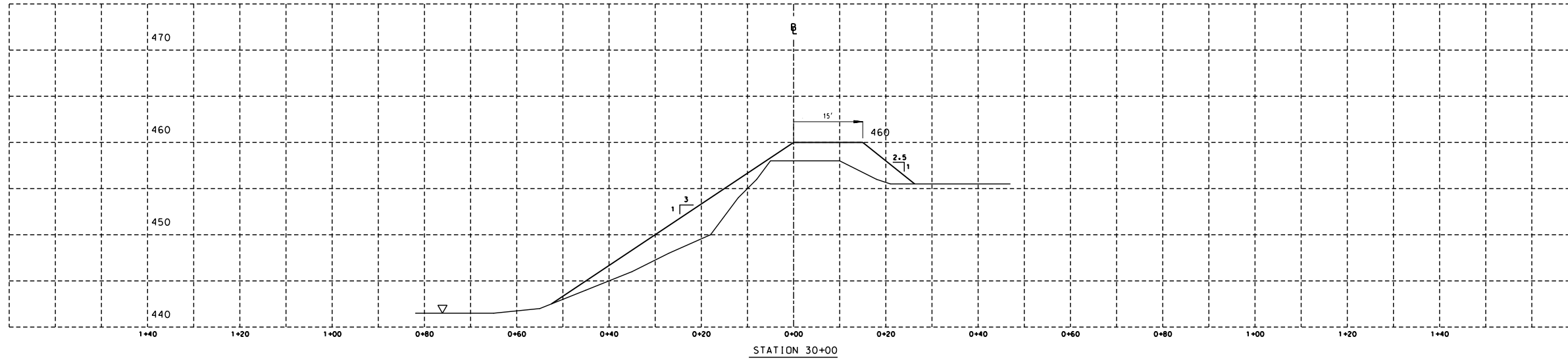
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DR GRH	CAD EM	DATE	12-30-87		
DK	CKD	SCALE	1"=10'H, 1"=5' V		
APP	PLOTTED	11-4-91	E-HEN1-B453		



STATION 39+00



STATION 35+00



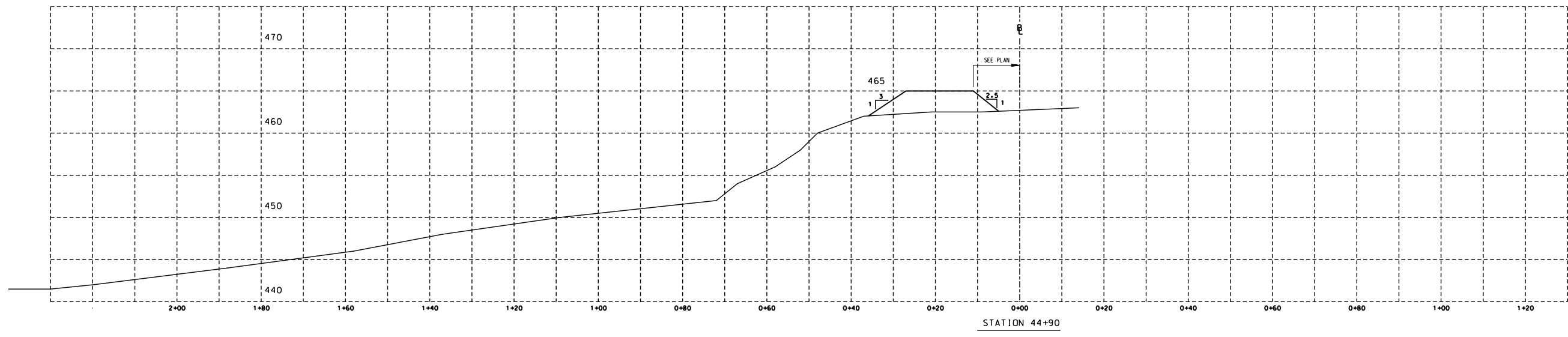
STATION 30+00

- LEGEND**
- REFERENCE BASE LINE SHOWN ON PLAN
 - OLD BERM
 - NEW BERM
 - WATER LINE
 - * ESTIMATED ELEVATION

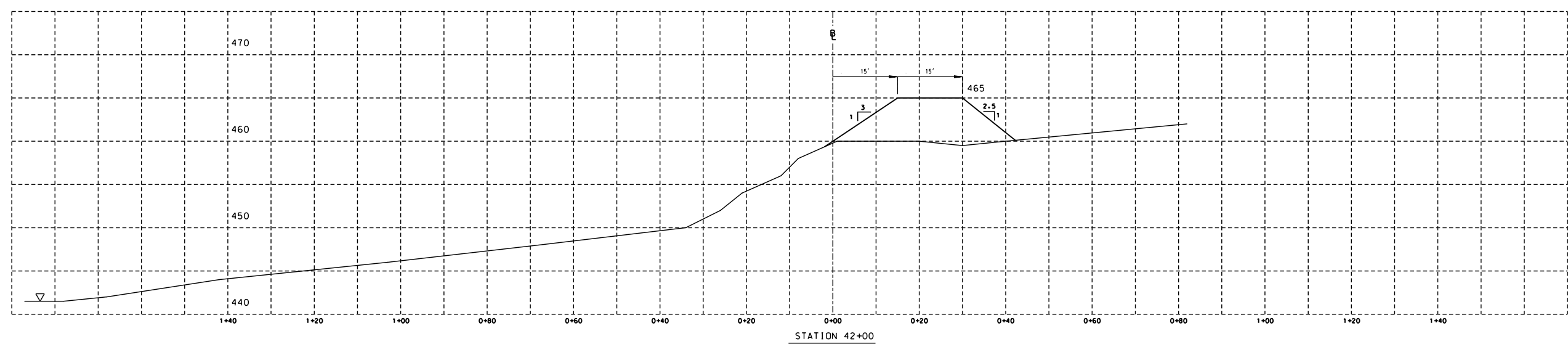
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REFERENCES

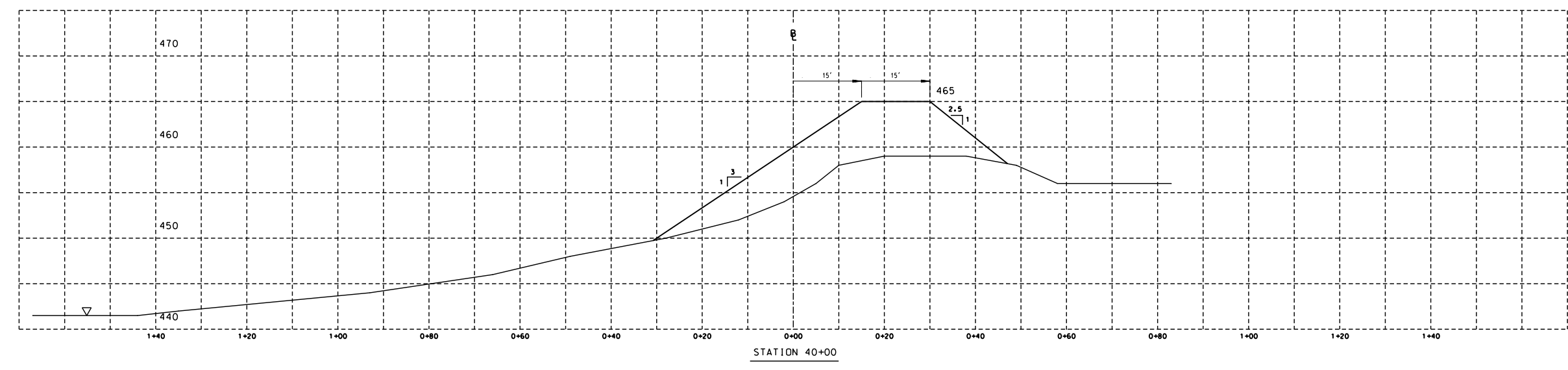
REVISION STATUS	ILLINOIS POWER COMPANY
CONSTRUCTION	DECATUR
RECORD	CROSS SECTIONS OF
	ASH POND BERM EXTENSION
	STA 30+00, 35+00 & 39+00
	HENNEPIN POWER STATION
DR GRH	CAD EM
DATE	DATE 12-30-87
OK	CKD
SCALE	SCALE 1"=10' H, 1"=5' V
APP	PLOTTED
APP	11-4-97
	E-HEN1-B454



1+40



STATION 42+00



STATION 40+00

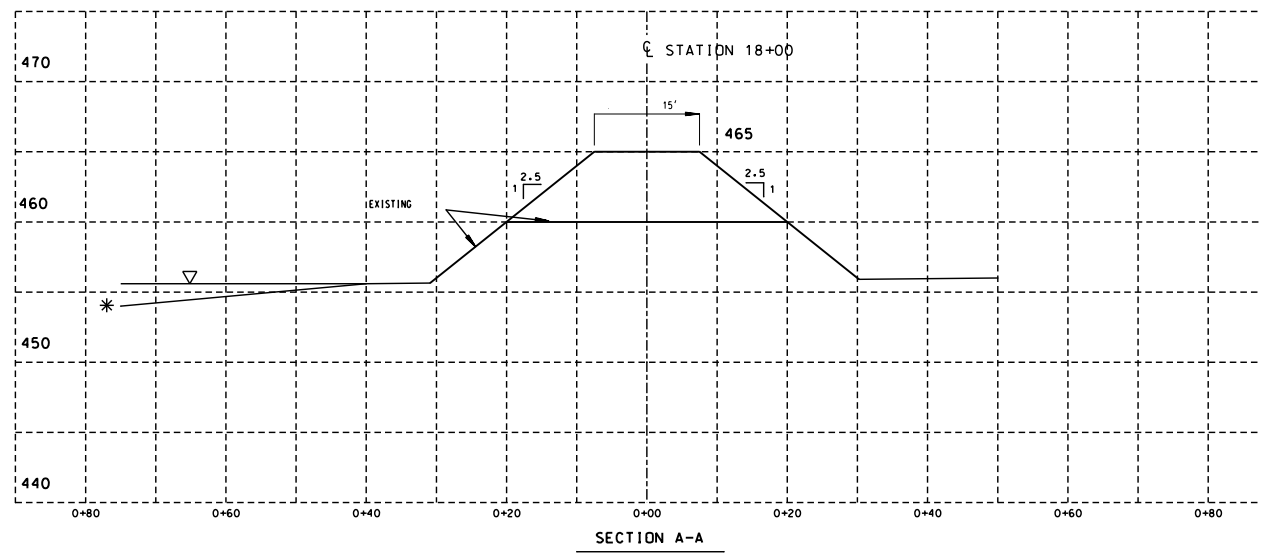
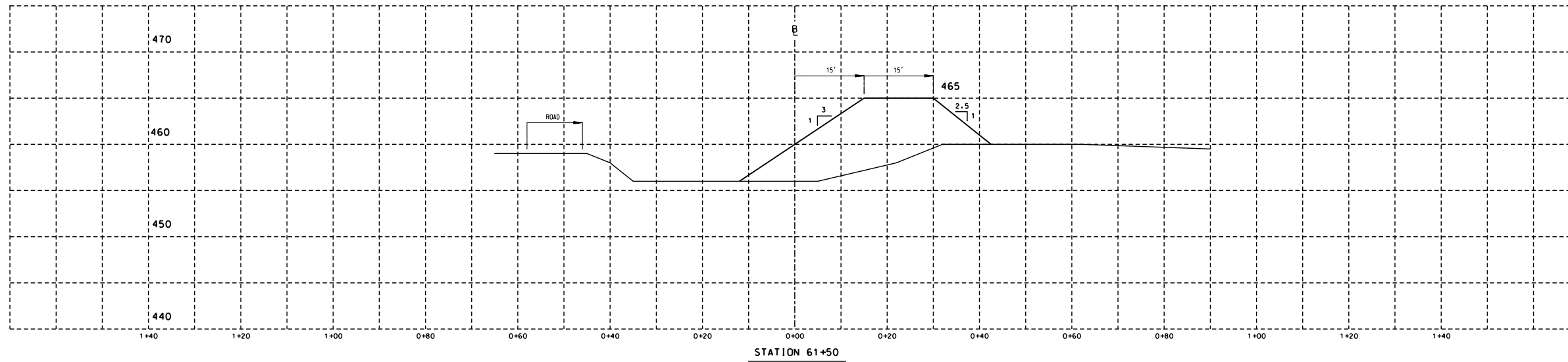
- LEGEND**
- REFERENCE BASE LINE SHOWN ON PLAN
 - OLD BERM
 - NEW BERM
 - WATER LINE
 - * ESTIMATED ELEVATION

NO	DATE	DRF	DESCRIPTION	E	C	A	NO	DATE	DRF	DESCRIPTION	E	C	A	NOTES

REFERENCES

REVISION STATUS	ILLINOIS POWER COMPANY
□ - CONSTRUCTION	DECATUR
○ - RECORD	CROSS SECTIONS OF
	ASH POND BERM EXTENSION
	STA 40+00, 42+00 & 44+90
	HENNEPIN POWER STATION
	DATE 12-30-87
DR GRH	SCALE 1"=10' H, 1"=5' V
CKD	
APP	PLOTTED 11-4-97
APP	E-HEN1-B455

E-HEN1-B455



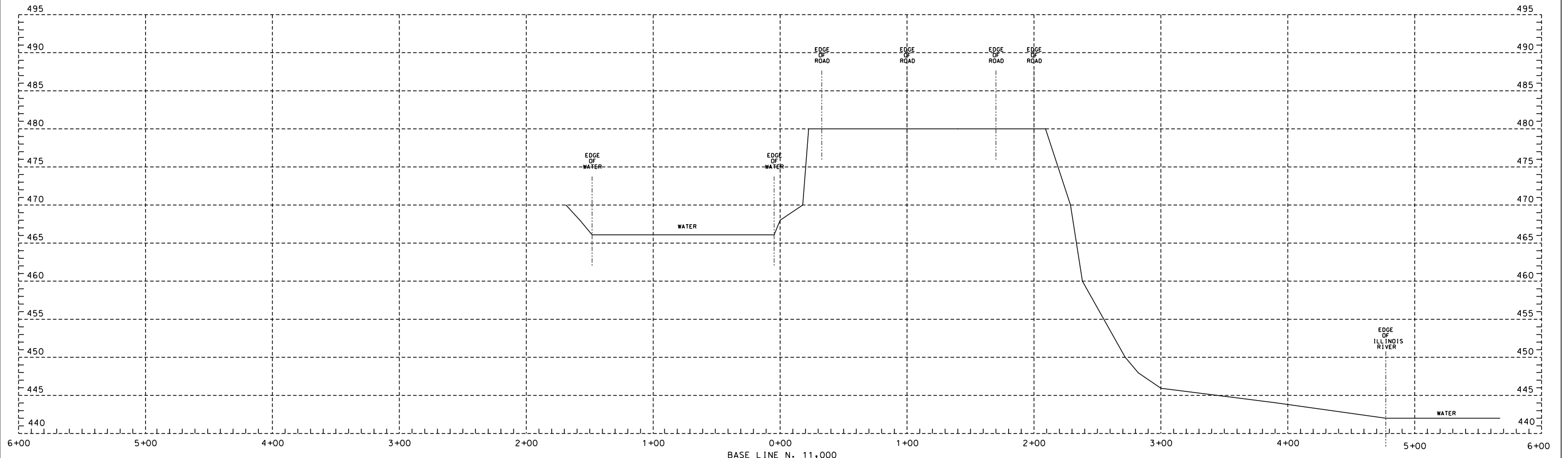
- LEGEND
- REFERENCE BASE LINE SHOWN ON PLAN
 - OLD BERM
 - NEW BERM
 - WATER LINE
 - ESTIMATED ELEVATION

NO	DATE	DRF	DESCRIPTION	E	C	A	NO	DATE	DRF	DESCRIPTION	E	C	A	NOTES
1														
2														
3														
4														
5														

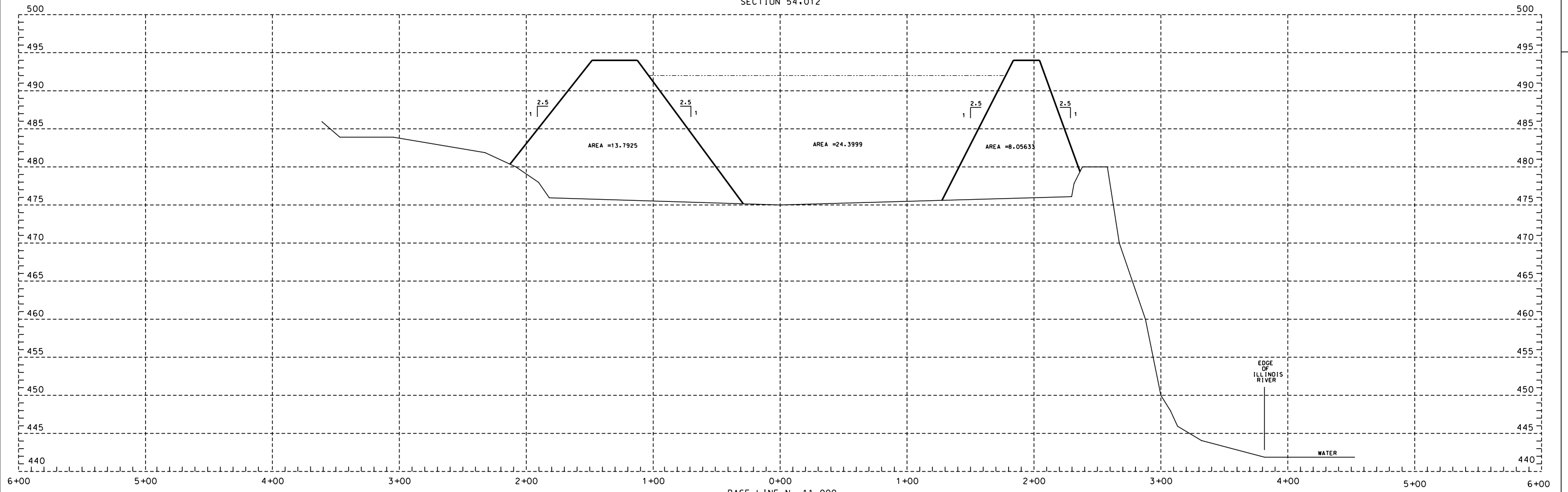
NO	DATE	DRF	DESCRIPTION	E	C	A	NOTES
1							
2							
3							
4							
5							

NO	DATE	DRF	DESCRIPTION	E	C	A	REFERENCES
1							
2							
3							
4							
5							

REVISION STATUS	ILLINOIS POWER COMPANY
□ - CONSTRUCTION	DECATUR
○ - RECORD	CROSS SECTIONS OF
	ASH POND BERM EXTENSION
	STA 61+50
	HENNEPIN POWER STATION
DR GRH	CAD EM
OK	DATE 12-30-87
APP	SCALE 1"=10'H, 1"=5'V
	PLOTTED
	11-4-97
	E-HEN1-B457



BASE LINE N. 11.000
SECTION 54.012



BASE LINE N. 11.000
SECTION E. 53.812

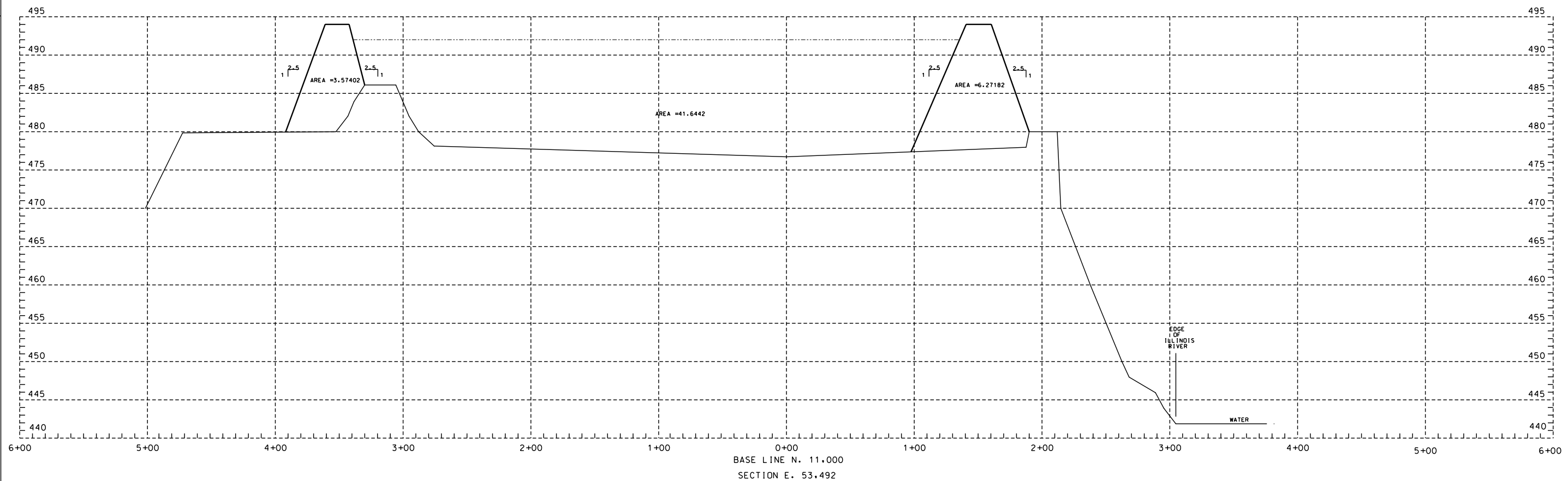
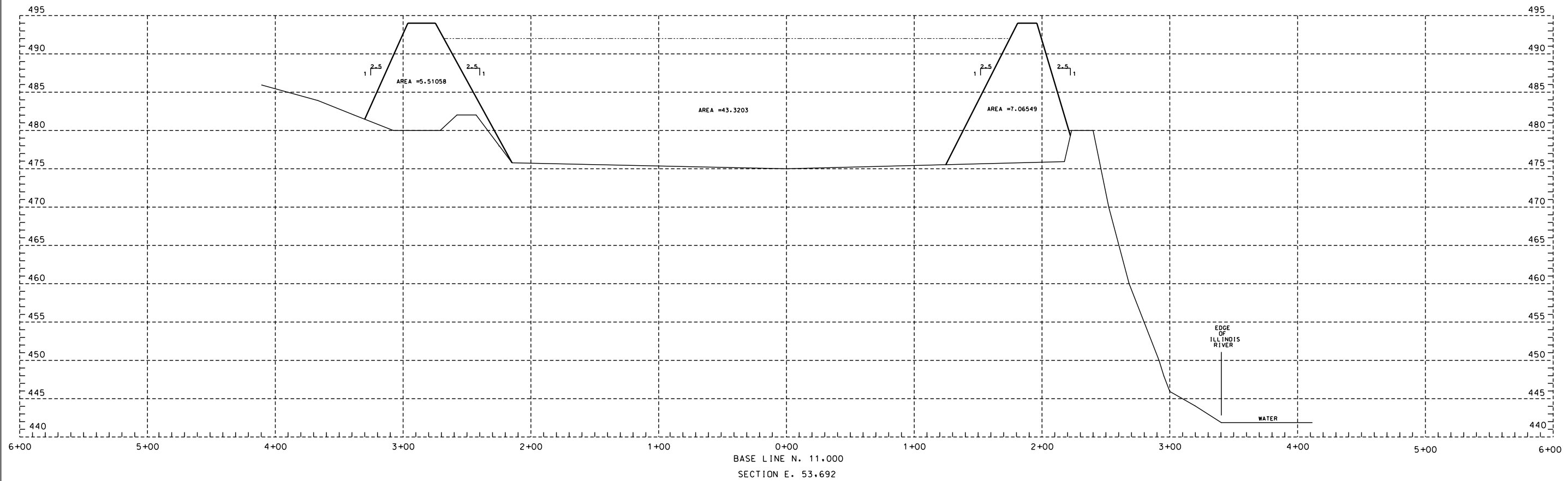
NO	DATE	DRF	DESCRIPTION	E	C	A	NO	DATE	DRF	DESCRIPTION	E	C	A
0													

NOTES

- DATA COLLECTED FROM TOPO ON DWG. CE-HEN1-B-450 DATED NOV. 4, 1987. REV. 0
- COORDINATES WERE SUPPLIED BY G. DECKARD FIELD INFORMATION TIEING TO J.L. FISHER'S PANELS.

REFERENCES

REVISION STATUS		ILLINOIS POWER COMPANY	
<input type="checkbox"/> CONSTRUCTION	<input type="checkbox"/> RECORD	DECATUR	
0		CROSS SECTIONS	
		EAST ASH POND EXTENSION	
		HENNEPIN POWER STATION	
DR	WJM	CAD	WJM
DK		DATE	1-11-89
APP		SCALE	1"=5' V. 1"=30' H.
APP		PLOTTED	
		DATE	03-08-90
			CE-HEN1-B458-1



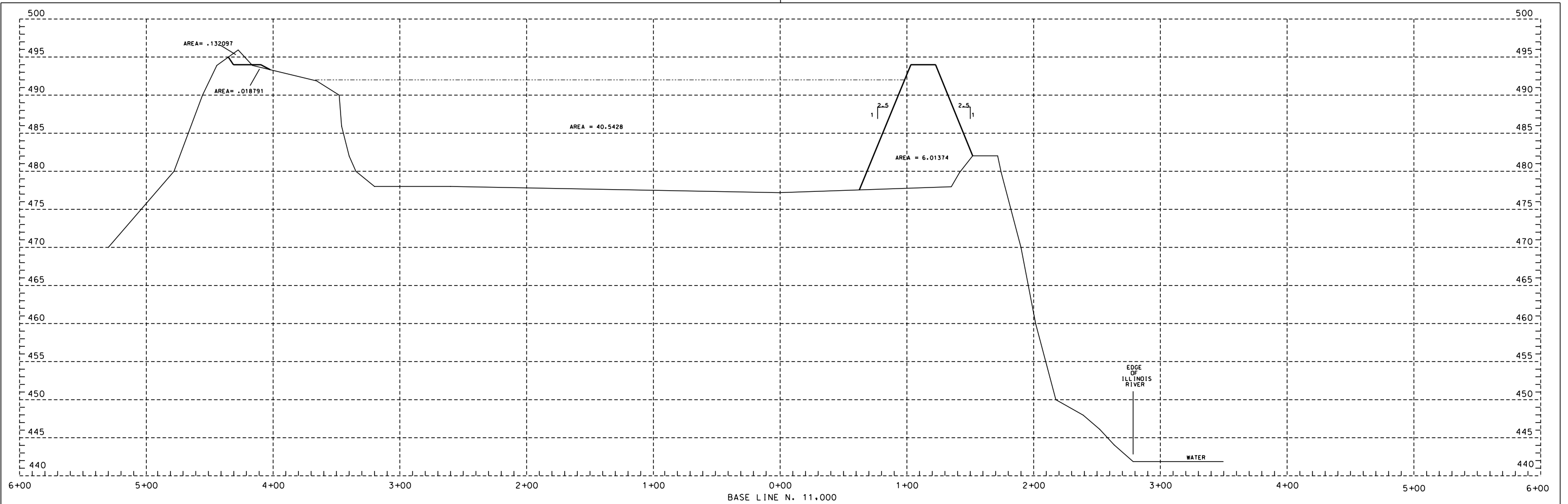
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NOTES

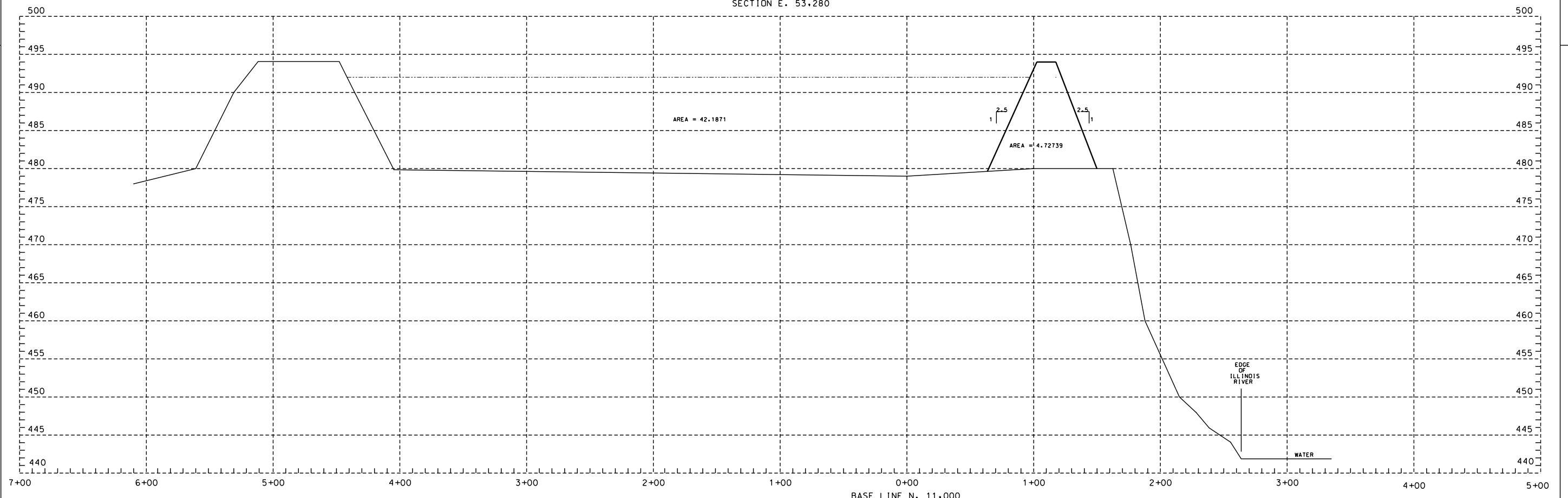
- DATA COLLECTED FROM TOPO ON DWG. CE-HEN1-B-450 DATED NOV. 4, 1987, REV. 0
- COORDINATES WERE SUPPLIED BY G. DECKARD FIELD INFORMATION TIEING TO J.L. FISHER'S PANELS.

REFERENCES

REVISION STATUS				ILLINOIS POWER COMPANY			
<input type="checkbox"/>	CONSTRUCTION			DECATUR			
<input type="checkbox"/>	RECORD			CROSS SECTIONS			
				EAST ASH POND EXTENSION			
				HENNEPIN POWER STATION			
DR	WJM	CAD	WJM	DATE	1-12-89		
OK		CKD		SCALE	1"=5' V. 1"=30' H.		
APP		APP		PLOTTED	03-08-90		
				CE-HEN1-B458-2			



BASE LINE N. 11.000
SECTION E. 53.280



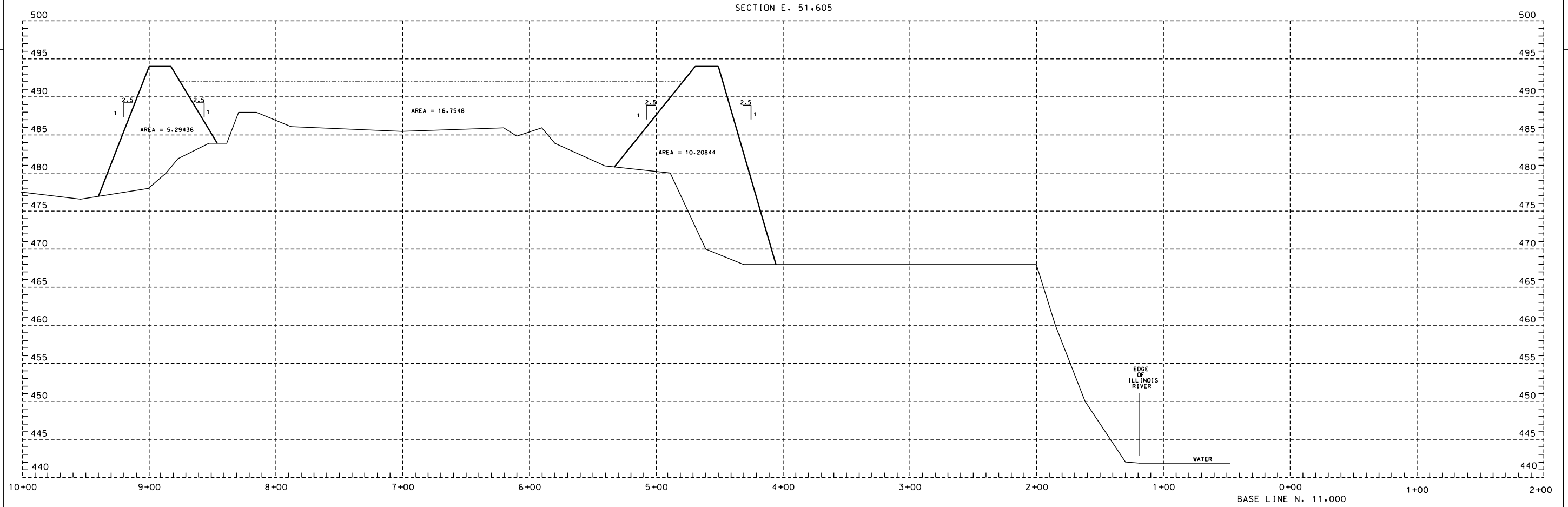
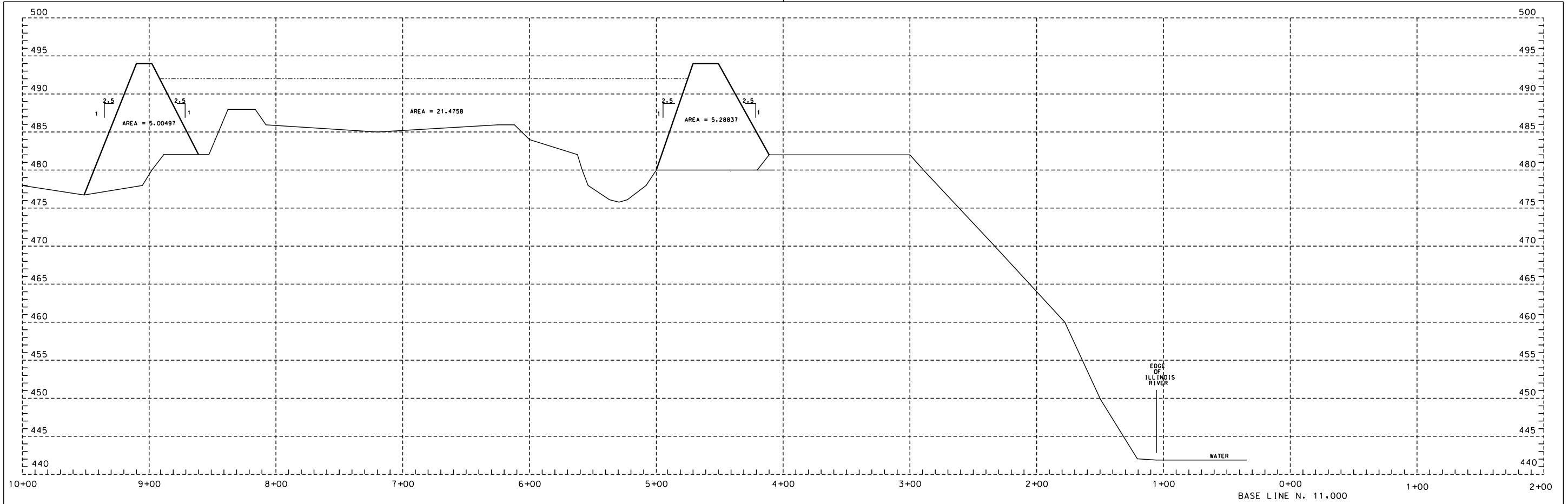
BASE LINE N. 11.000
SECTION E. 53.080

NO	DATE	DRF	DESCRIPTION	E	C	A	NO	DATE	DRF	DESCRIPTION	E	C	A
0													

NOTES
 1. DATA COLLECTED FROM TOPO ON DWG. CE-HEN1-B-450 DATED NOV. 4, 1987, REV. 0
 2. COORDINATES WERE SUPPLIED BY G. DECKARD FIELD INFORMATION TIEING TO J.L. FISHER'S PANELS.

REFERENCES

REVISION STATUS		ILLINOIS POWER COMPANY	
□	CONSTRUCTION	DECATUR	
□	RECORD	EAST ASH POND EXTENSION	
		HENNEPIN POWER STATION	
DR	WJM	CAD	WJM
DATE	1-12-89	SCALE	1"=25' V. 1"=30' H.
OK	CKD	PLOTTED	
APP		DATE	03-08-90
APP		DWG NO.	CE-HEN1-B458-3



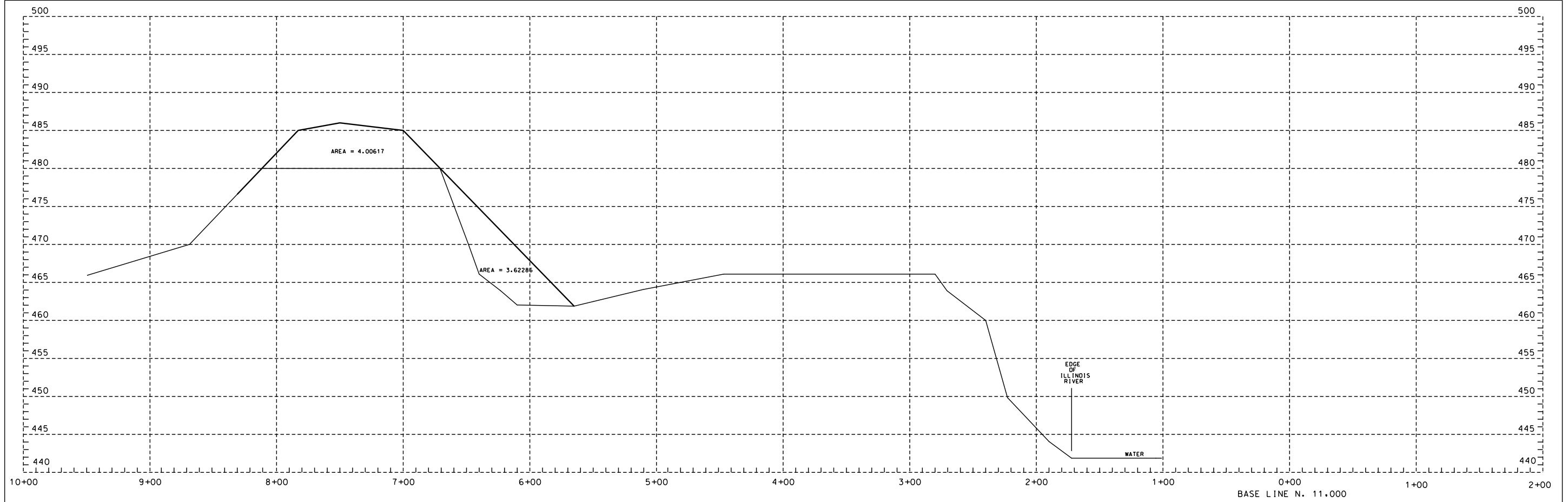
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NOTES

- DATA COLLECTED FROM TOPO ON DWG. CE-HEN1-B-450 DATED NOV. 4, 1987. REV. 0
- COORDINATES WERE SUPPLIED BY G. DECKARD FIELD INFORMATION TIEING TO J.L. FISHER'S PANELS.

REFERENCES

REVISION STATUS		ILLINOIS POWER COMPANY	
<input type="checkbox"/> CONSTRUCTION	<input type="checkbox"/> RECORD	DECATUR	
CROSS SECTIONS		EAST ASH POND EXTENSION	
HENNEPIN POWER STATION		CE-HEN1-B458-6	
DR: WJM	CAD: WJM	DATE: 1-12-89	
DK:	CKD:	SCALE: 1"=25'	V. 1"=30' H.
APP:	PLOTTED:	03-08-90	



SECTION E. 51.285

BASE LINE N. 11.000

NO	DATE	DRF	DESCRIPTION	E	C	A	NO	DATE	DRF	DESCRIPTION	E	C	A
0													

NOTES

- DATA COLLECTED FROM TOPO ON DWG. CE-HEN1-B-450 DATED NOV. 4, 1987. REV. 0
- COORDINATES WERE SUPPLIED BY G. DECKARD FIELD INFORMATION TIEING TO J.L. FISHER'S PANELS.

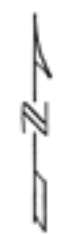
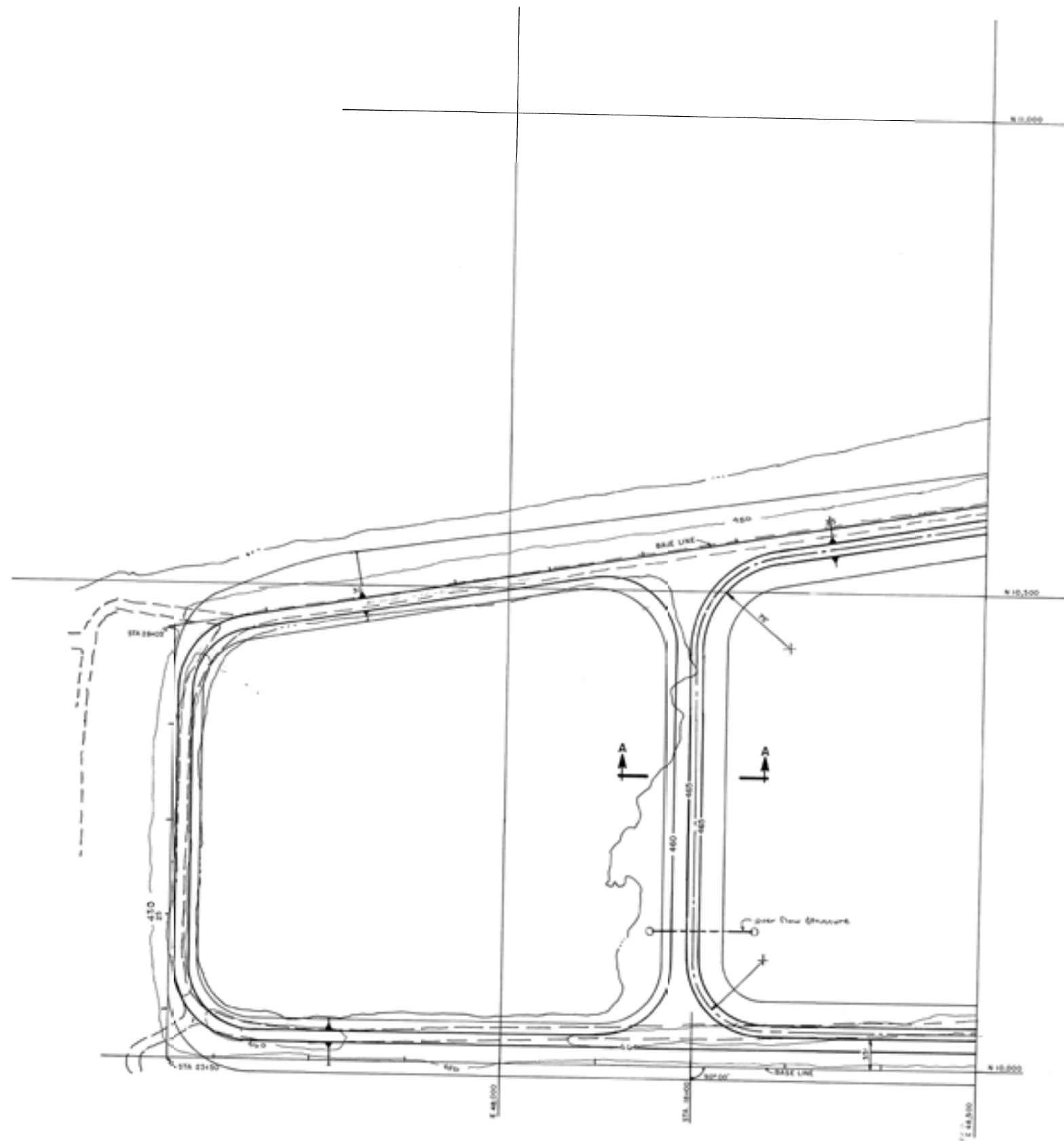
REFERENCES

REVISION STATUS				ILLINOIS POWER COMPANY			
0 - CONSTRUCTION				DECATUR			
0 - RECORD				CROSS SECTIONS			
				EAST ASH POND EXTENSION			
				HENNEPIN POWER STATION			
DR	WJM	CAD	WJM	DATE	1-12-89		
OK		CKD		SCALE	1"=5' V. 1"=30' H.		
APP		APP		PLOTTED	03-08-90		
APP		APP			CE-HEN1-B458-7		



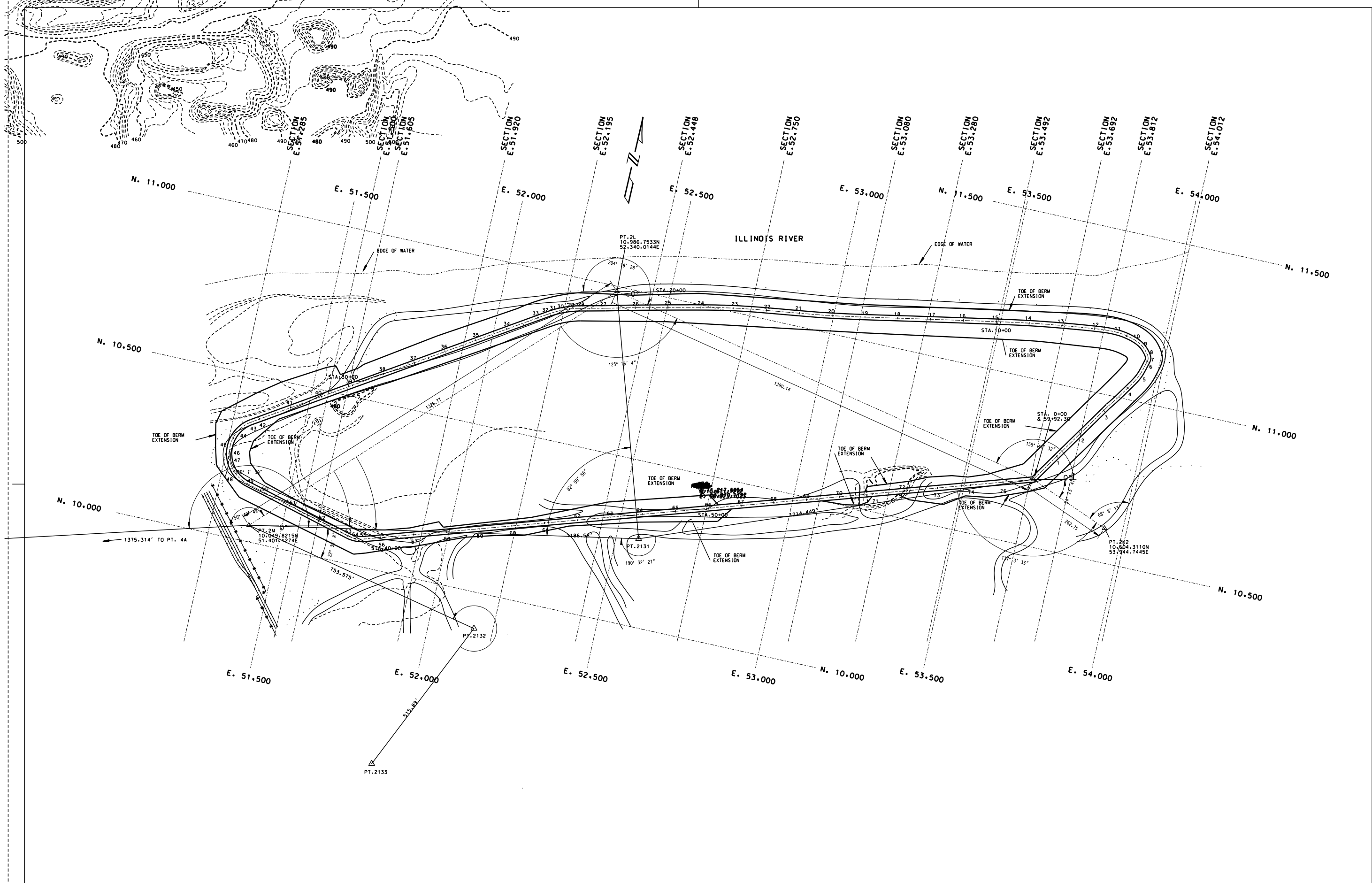
BASE LINE
FOR DRAINAGE
FOR 83479
2 10 500'

ILLINOIS POWER COMPANY DECATUR	
PLAN-UNIT 1 ASH POND EXTENSION HENNEPIN POWER STATION SHEET # 1	
DESIGNED BY CHECKED BY DATE	DRAWN BY DATE SCALE
E-483.00 E-490.00 E-495.00 E-500.00	E-HEN1-B460-1



Scanned by T.I.I.'s Power Company

DIVISION OF THE CONSTRUCTION DEPARTMENT		ILLINOIS POWER COMPANY DECA, ILL.	
PLAN - UNIT# ASH POND EXTENSION HENNEPIN POWER STATION			
SHEET # 2			
DR. G. S. G.	BY	DATE	SCALE
DR. J. G. G.	DR. J. G. G.	2-17-58	1" = 50'
DR. J. G. G.	DR. J. G. G.		
			E-HEN1-B460-2



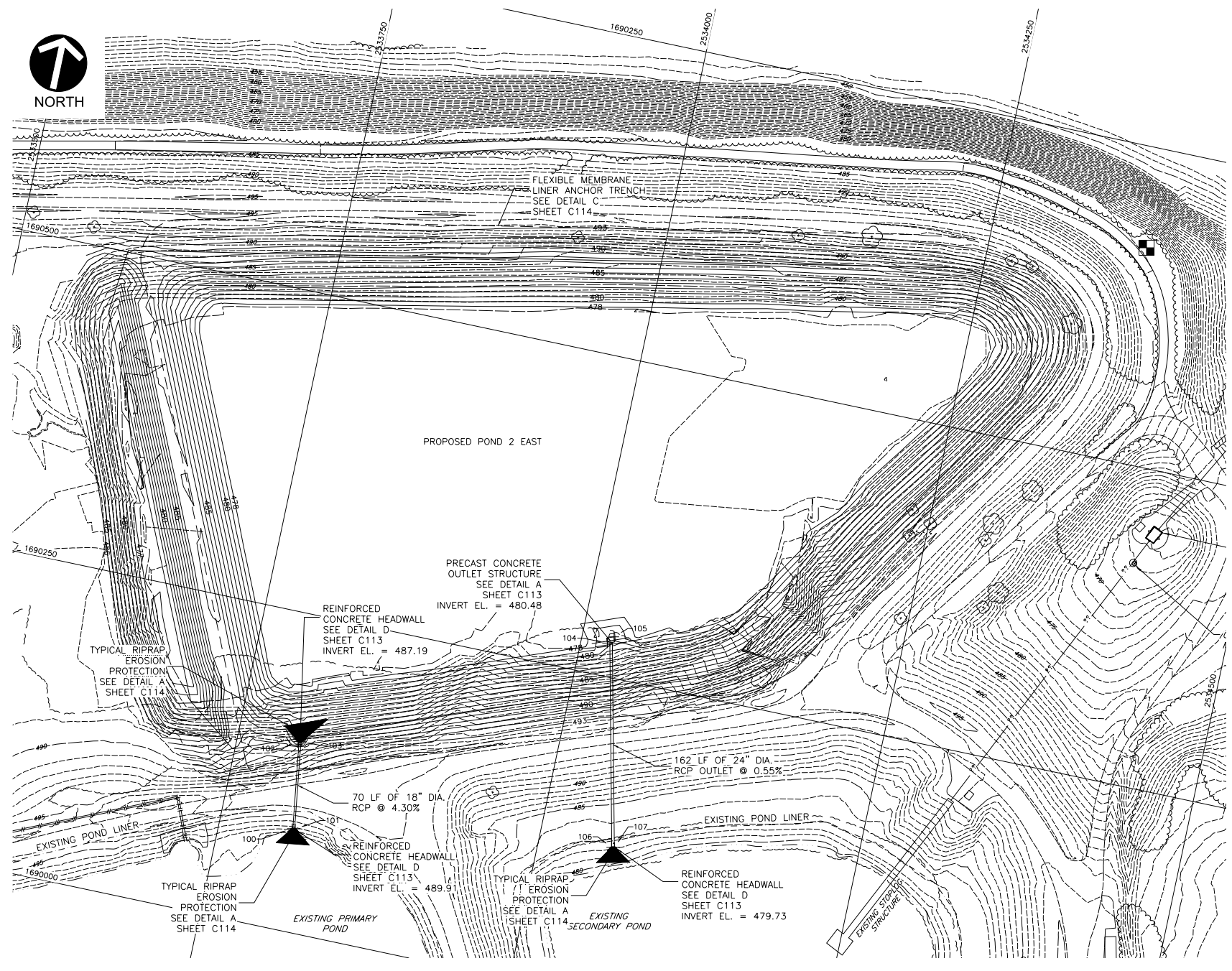
NO	DATE	DRF	DESCRIPTION	E	C	A	NO	DATE	DRF	DESCRIPTION	E	C	A	NOTES

REFERENCES	

NOTE: TOPD WAS DIGITIZED FROM DWG. CE-HEN1-B-450 DATED 11-4-87

REVISION STATUS	ILLINOIS POWER COMPANY
□ CONSTRUCTION	DECATUR
○ RECORD	CONTOUR AND GRADING PLAN
	UNIT #2 ASH POND EXTENSION
	HENNEPIN POWER STATION
DR WJM	CAD WJM
DATE 1-11-89	SCALE 1"=100'
DR CKD	PLOTTED
APP APP	03-08-90
	CE-HEN1-B461

DWG. 1.2.3.4.5



STRUCTURE TABLE		
Point #	Northing	Easting
100	1690080.864	2533807.450
101	1690081.207	2533809.928
102	1690149.246	2533797.977
103	1690149.589	2533800.456
104	1690276.331	2534020.790
105	1690282.205	2534024.973
106	1690118.909	2534057.560
107	1690119.451	2534060.003

NOTE
 THE LOCATION OF THE ABOVE AND BELOW GRADE STRUCTURES SHOWN ON THESE DRAWINGS ARE APPROXIMATE. PRIOR TO PERFORMING EXCAVATIONS, THE CONTRACTOR SHALL FIELD LOCATE STRUCTURES THAT MAY BE WITHIN THE LIMITS OF WORK AND PROTECT THEM ACCORDINGLY.

LEGEND

---	PROPOSED INDEX CONTOURS
---	PROPOSED INTERMEDIATE CONTOURS
---	EXISTING INDEX CONTOURS
---	EXISTING INTERMEDIATE CONTOURS
---	EXISTING STORM WATER DRAINS
---	EXISTING ACCESS ROAD

SCALE IN FEET
 0 40 80
 DRAWING NOT TO SCALE IF SCALE BAR DOES NOT MEASURE 2 INCHES

REFERENCE
 1. TOPOGRAPHIC INFORMATION BASED UPON AERIAL SURVEY CONDUCTED BY SURDEX CORPORATION FLOWN ON OCTOBER 26, 2008.

CEC
Civil & Environmental Consultants, Inc.
 5910 Haper Road, Suite 106 • Solon, OH 44139
 Ph: 330.310.6800 • 866.507.2324
 www.cecinc.com

DYNEGY CONFIDENTIAL
 This drawing is the property of DYNEGY INC. Neither this drawing, nor reproductions of it, nor information derived from it, shall be given to others without the expressed written consent of DYNEGY INC. No use is to be made of it which is, or may be, injurious to DYNEGY INC.

REFERENCE DRAWINGS

NO.	DATE	REVISION	BY	APPROVED
1	7/28/10	RECORD REVISION - 082-255	DFB	SFP

NO.	DATE	REVISION	BY	APPROVED
1	7/28/10	RECORD REVISION - 082-255	DFB	SFP

SCALE	AS NOTED
DWN	DATE
DFB	07/05/2010
CHK	DATE
RTM	07/12/2010
APPV	DATE
SFP	07/12/2010

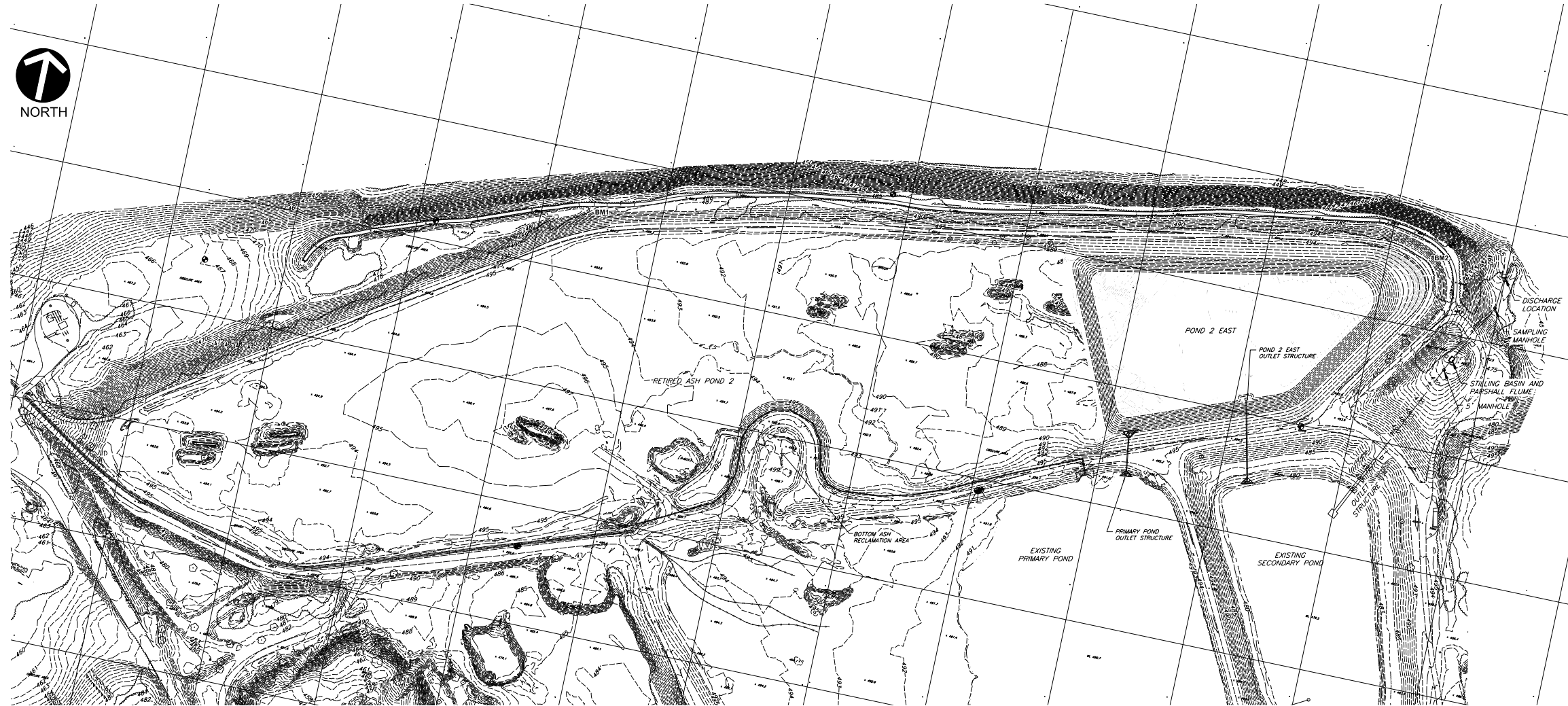
DYNEGY

DYNEGY MIDWEST GENERATION, INC.
 HENNEPIN POWER STATION
 POND 2 EAST
 FLEXIBLE MEMBRANE LINER AND STRUCTURES

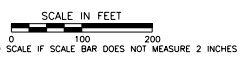
PROJECT NO: 082-255
 CLIENT: DYNEGY
 DWG NO: HENI-C109

REV: 07/05/2010

1
2
3
4
HENNEPIN
HENI-C109
DFB
07/05/2010



BENCHMARK LOCATIONS			
NUMBER	NORTHING	EASTING	ELEVATION
1	1690395.43	2532618.60	482.19
2	1690670.86	2534372.87	484.08
3*	1689478.87	2534643.99	506.80
4*	1688458.82	2533256.76	499.45
5*	1688781.84	2531352.15	468.27
6*	1689875.08	2531310.12	463.75



- * BENCHMARKS BEYOND DRAWING BOUNDARY.
- REFERENCE:
1. TOPOGRAPHIC INFORMATION BASED UPON AERIAL SURVEY CONDUCTED BY SURTEX CORPORATION, FLOWN ON SEPTEMBER 10, 2008.
DUE TO CONSTRUCTION ACTIVITIES, ACTUAL FIELD TOPOGRAPHY MAY VARY.
 2. POND 2 EAST CONTOURS FROM CONSTRUCTION DRAWINGS SUBMITTED AUGUST 2009.

LEGEND

— ? —	MISCELLANEOUS FLOW PIPING
— TT —	EXISTING STORMWATER DRAINS
— — — — —	EXISTING TREELINE
— — — — —	EXISTING PIPING
— — — — —	EXISTING ACCESS ROAD
— — — — —	EXISTING PONDS/STREAMS
— · — · —	EXISTING FENCE
⊕	EXISTING BENCHMARK
— -500 —	EXISTING INDEX CONTOUR
— -499 —	EXISTING INTERMEDIATE CONTOUR
⊗	EXISTING ROCK CHANNEL PROTECTION
⊙	EXISTING MONITORING WELL



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REFERENCE DRAWINGS

NO.	DATE	REVISION	BY	APPROVED

NO.	DATE	REVISION	BY	APPROVED
①	11/28/10	RECORD REVISION - 082-255	DFB	SFP

SCALE: AS NOTED

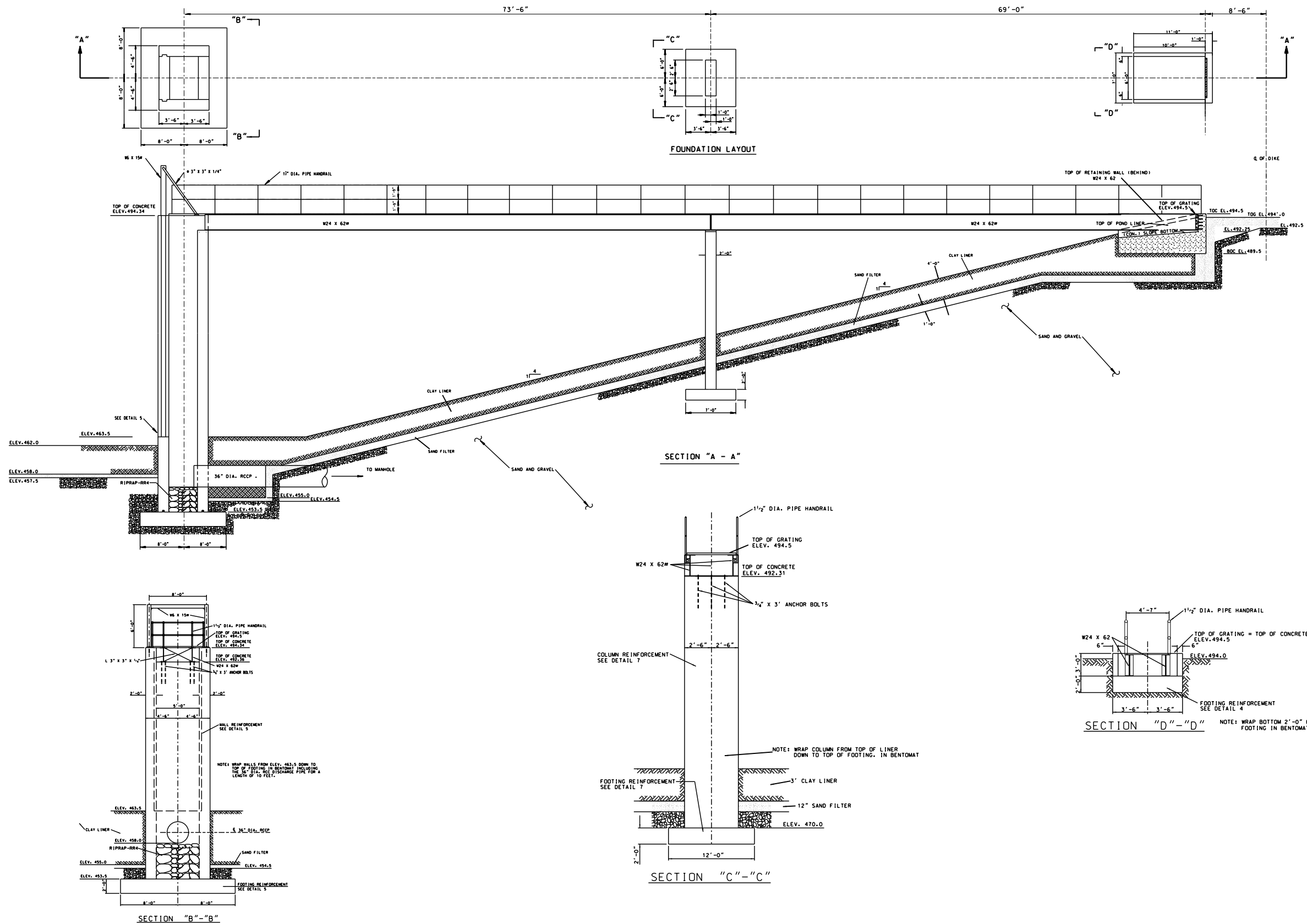
DWN.	DFB	DATE	11/05/2010
CHK.	RTM	DATE	11/12/2010
APPV.	SFP	DATE	11/12/2010
EAPP_BY	EABD		
FEAPP_BY	FEABD		

DYNEGY

DYNEGY MIDWEST GENERATION, INC.
HENNEPIN POWER STATION
LANDFILL PHASE 1 CONSTRUCTION
EXISTING CONDITIONS

PROJECT NO.	082-255
CLIENT	DYNEGY
DWG. NO.	HENI-C117

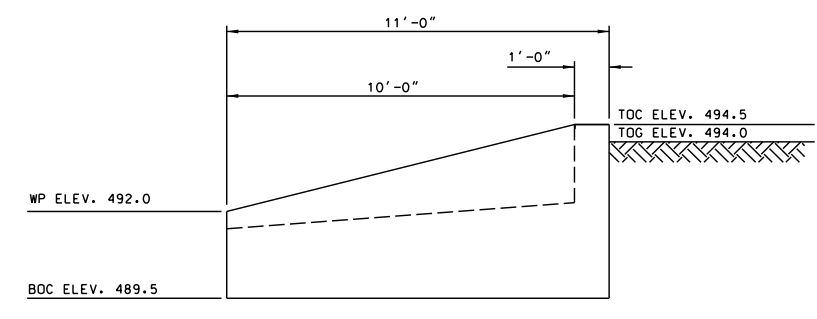
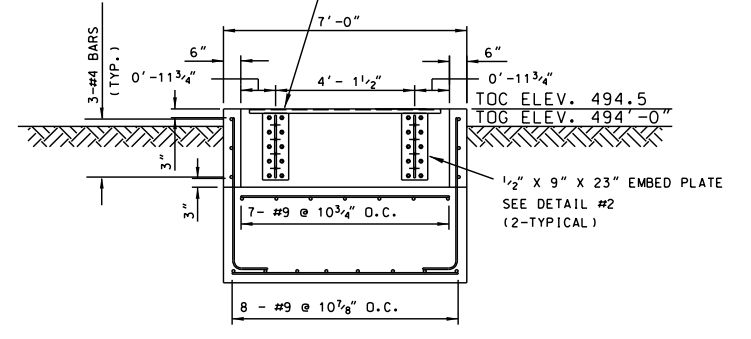
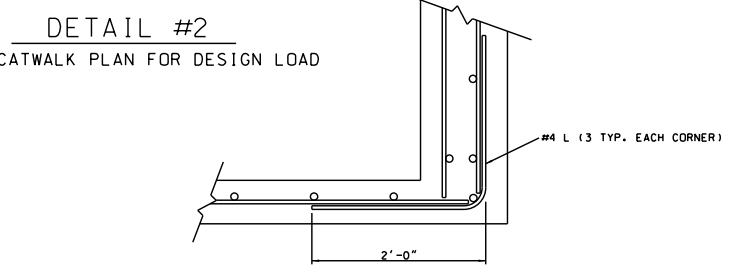
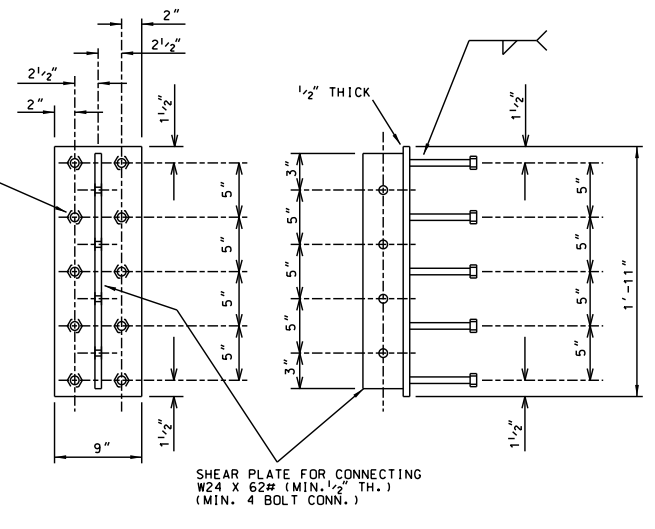
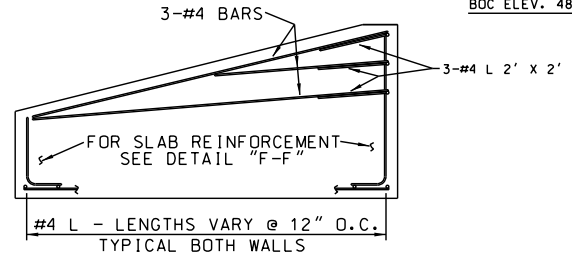
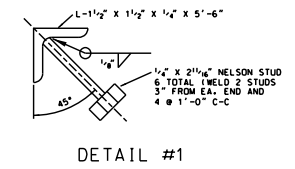
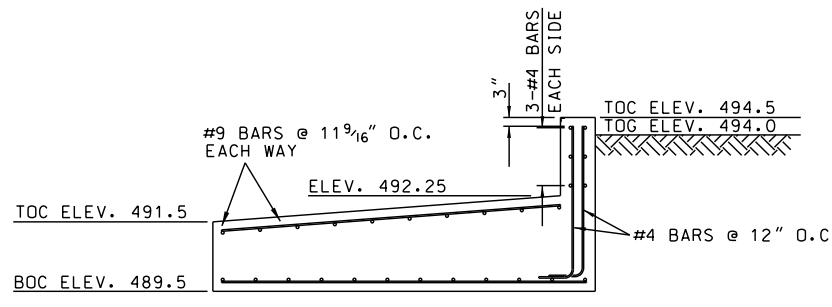
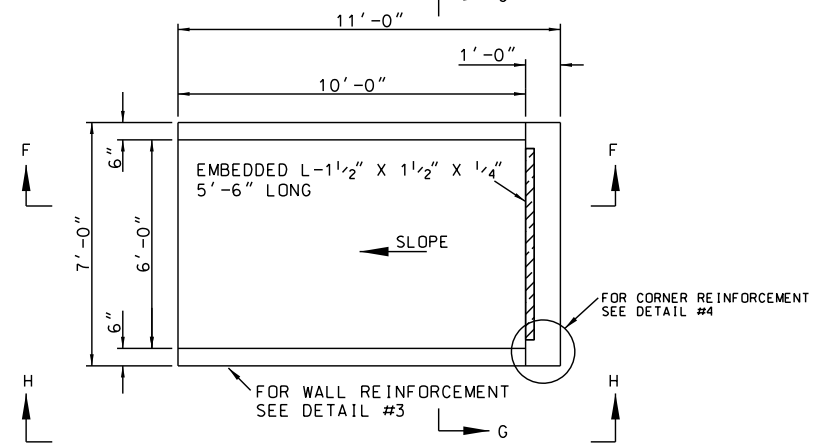
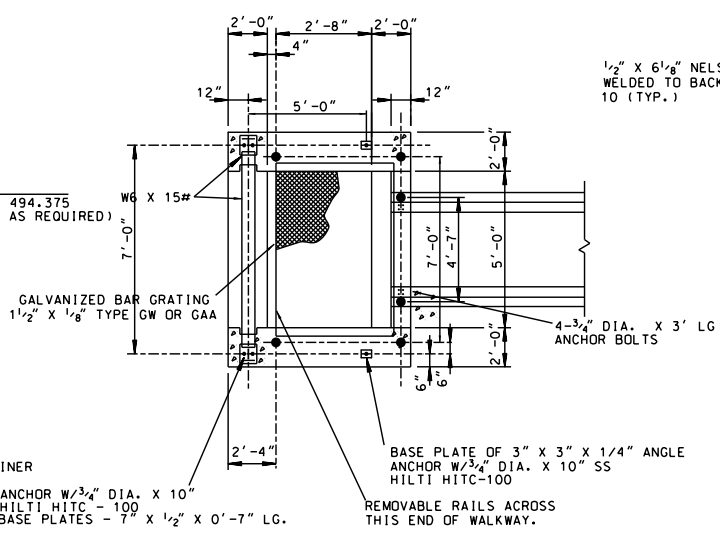
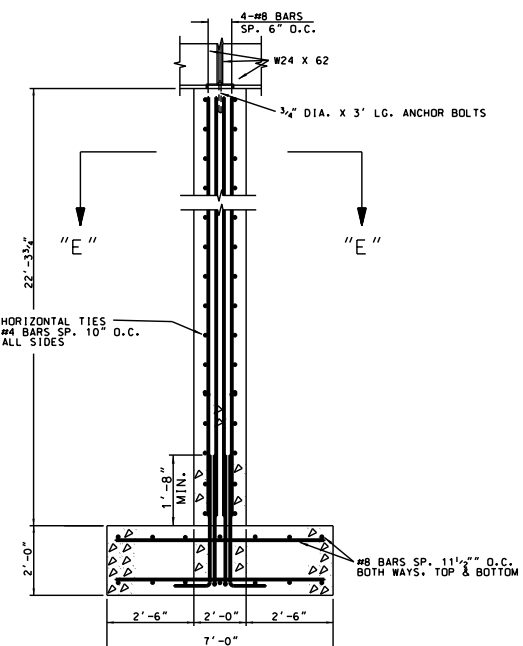
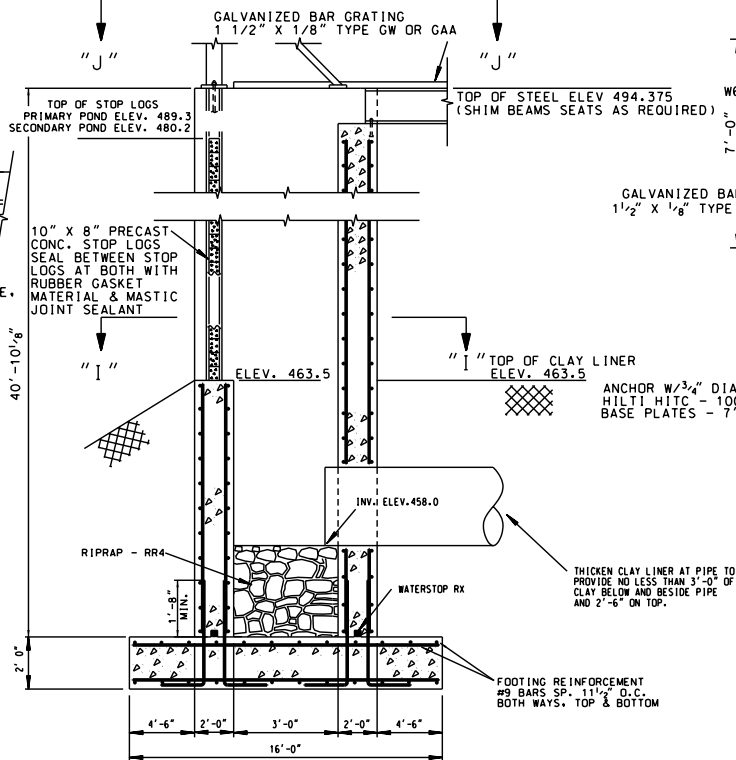
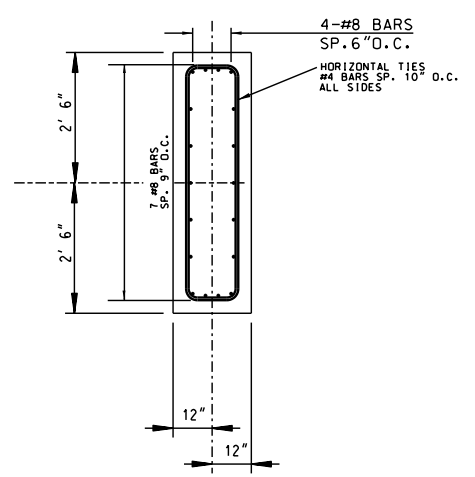
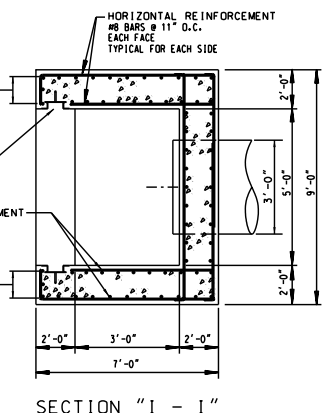
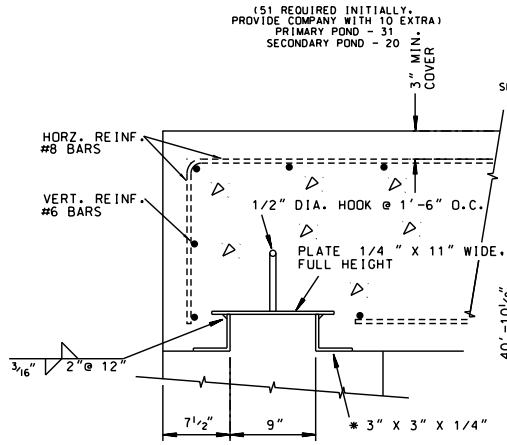
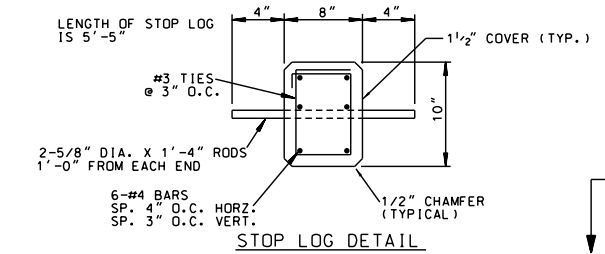
HENNEPIN
DFB
07/05/2010



NO	DATE	DRF	DESCRIPTION	E	C	A	NO	DATE	DRF	DESCRIPTION	E	C	A
0													

REVISION STATUS	ILLINOIS POWER COMPANY		
<input type="checkbox"/> -CONSTRUCTION	DECATUR		
<input type="checkbox"/> -RECORD	LAYOUT-POND DISCHARGE STRUCTURES		
	1995 ASH FACILITY		
	HENNEPIN POWER STATION		
DR G.R.H.	CAD G.R.H.	DATE	1/5/94
OK	CKD	SCALE	NO SCALE
APP	PLOTTED	9/17/96	
APP		CE-HEN1-C8	

p0019275.dgn



REVISION STATUS		ILLINOIS POWER COMPANY		
NO.	DESCRIPTION	DATE	BY	APP.
0	CONSTRUCTION			
0	RECORD			
		DECATUR		
		DETAILS: POND DISCHARGE STRUCTURE		
		1995 ASH FACILITY		
		HENNEPIN POWER STATION		
DR	G.R.H.	CAD	G.R.H.	DATE 1/5/94
OK		CKD		SCALE AS NOTED
APP		PLOTTED		
APP		9/17/96		
p0019276.dgn		CE-HEN1-C9		

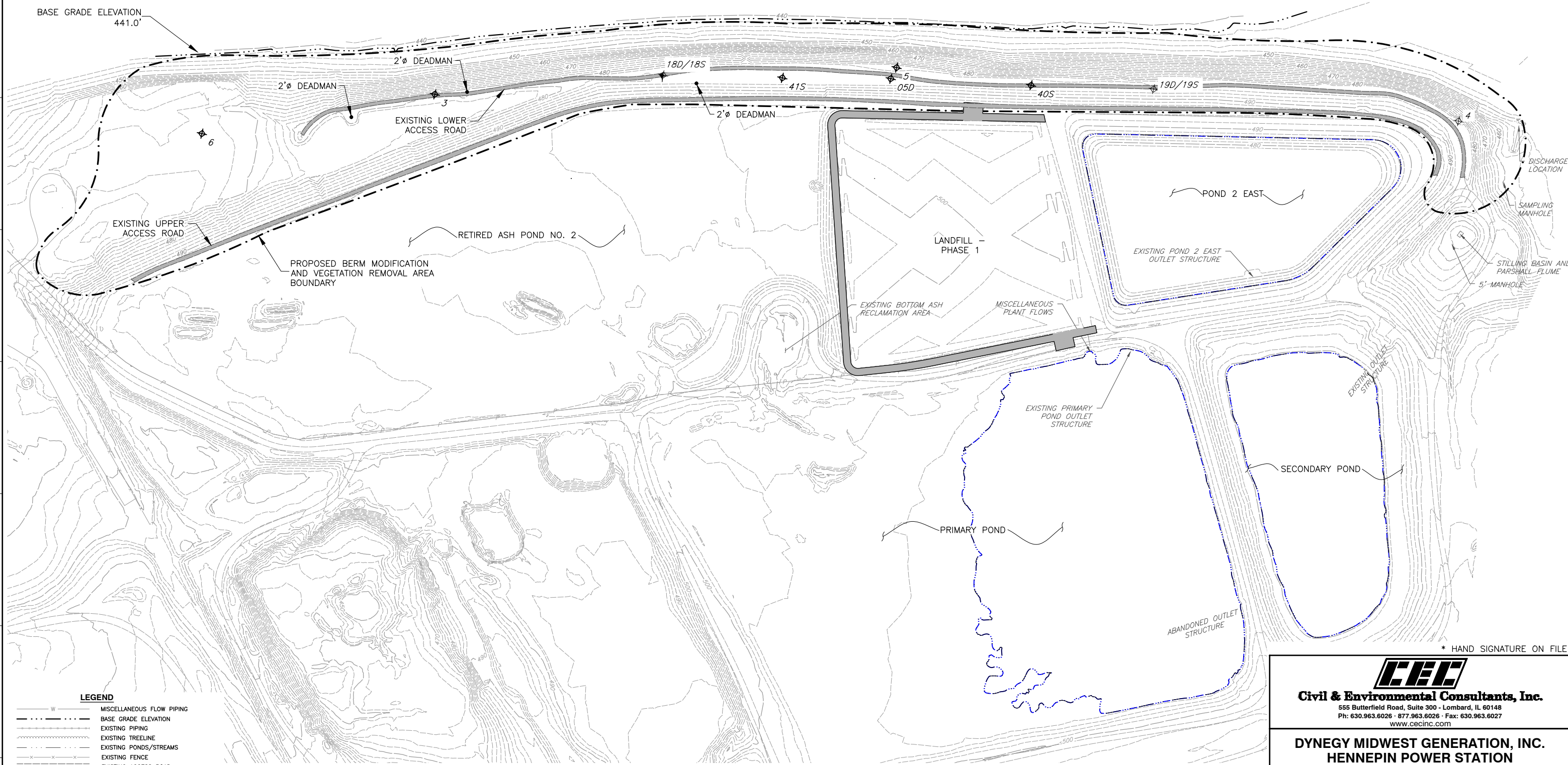


SUBMITTAL RECORD		
NO	DATE	DESCRIPTION
1	5/2013	IDNR DAM MODIFICATION PERMIT
2	6/9/2014	ISSUED FOR CONSTRUCTION
3	2/4/2015	AS-BUILT CONSTRUCTION DRAWINGS

REVISION RECORD		
NO	DATE	DESCRIPTION

BASE GRADE ELEVATION
441.0'

ILLINOIS RIVER
FLOW



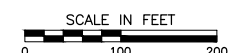
P:\2015\132-650\2015-CAD\DWG\132-650-010-EXISTING SITE CONDITIONS PLAN.dwg (1/2/2015 10:43 AM) - LP: 2/17/2015 10:43 AM

LEGEND

	MISCELLANEOUS FLOW PIPING
	BASE GRADE ELEVATION
	EXISTING PIPING
	EXISTING TREELINE
	EXISTING PONDS/STREAMS
	EXISTING FENCE
	EXISTING ACCESS ROAD
	EXISTING STORM WATER PIPING
	EXISTING UNDERGROUND PLANT FLOW PIPING
	EXISTING PLANT FLOW PIPING
	EXISTING INDEX CONTOURS
	EXISTING INTERMEDIATE CONTOURS
	EXISTING MONITORING WELL LOCATIONS
	EXISTING ACCESS ROAD
	PROPOSED EAST BERM MODIFICATIONS AREA BOUNDARY

- REFERENCE:**
1. TOPOGRAPHIC INFORMATION BASED UPON AERIAL SURVEY CONDUCTED BY SURDEX CORPORATION FLOWN ON SEPTEMBER 10, 2008.
 2. EMBANKMENT AREA SURVEY RECEIVED BY CEC FROM DLZ ON MARCH 4, 2013 AND JANUARY 10, 2014.
 3. IL DNR PERMIT NO. DS2014017-DAM I.D. NO. 50663
 4. AS-BUILT SURVEY RECEIVED BY CEC FROM DLZ, DECEMBER 12, 2014.

AS-BUILT CONSTRUCTION PLANS



* HAND SIGNATURE ON FILE

CEC
Civil & Environmental Consultants, Inc.
 555 Butterfield Road, Suite 300 - Lombard, IL 60148
 Ph: 630.963.6026 - 877.963.6026 - Fax: 630.963.6027
 www.cecinc.com

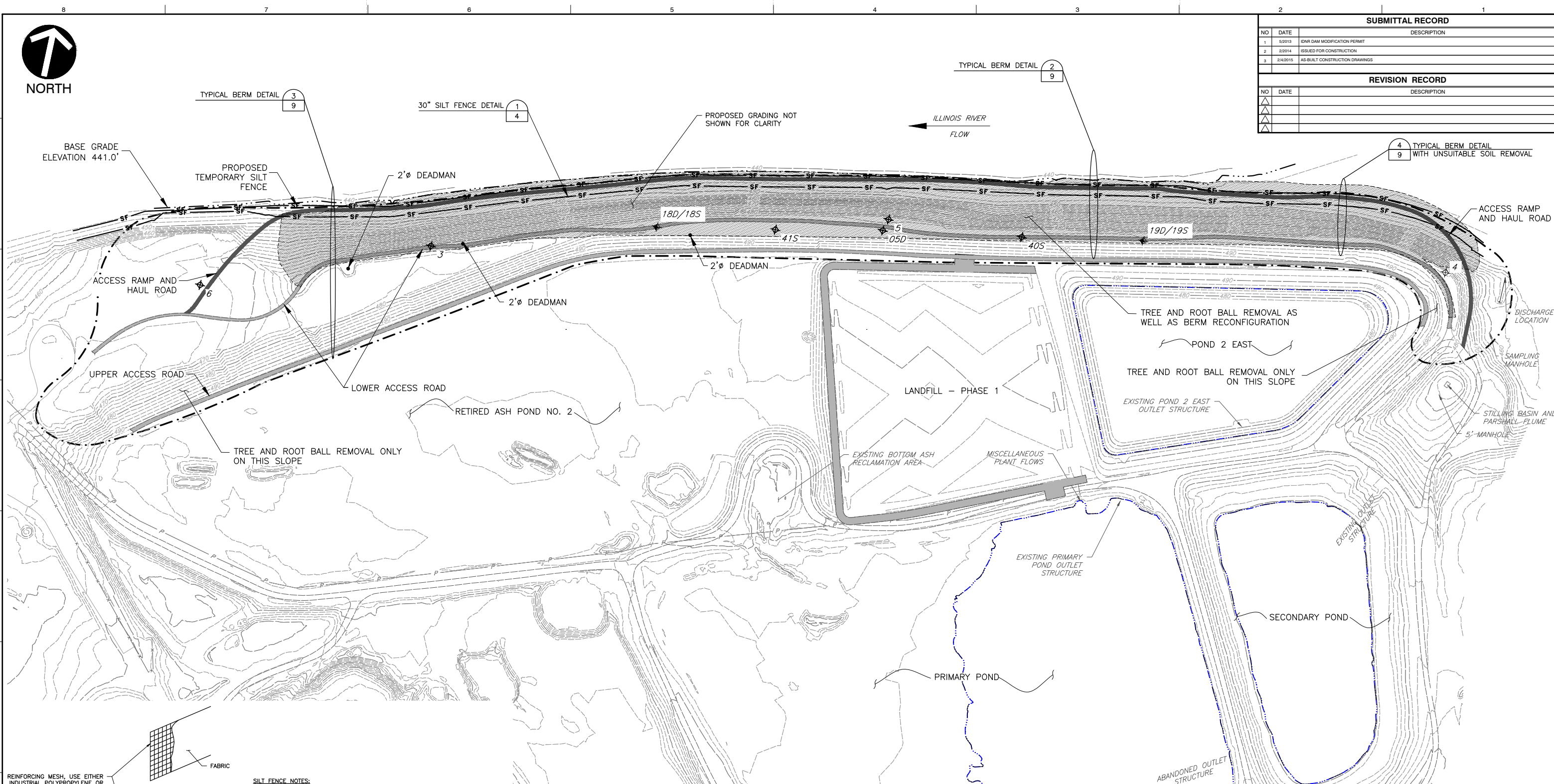
DYNEGY MIDWEST GENERATION, INC.
HENNEPIN POWER STATION
EAST BERM MODIFICATION
HENNEPIN, ILLINOIS

DRAWN BY: DFB	CHECKED BY: MDJ	APPROVED BY: MDJ	*MDJ
DATE: FEBRUARY 2015	DWG SCALE: AS NOTED	PROJECT NO: 132-650	
EXISTING SITE CONDITIONS PLAN			DRAWING NO: 3
			SHEET 3 OF 9

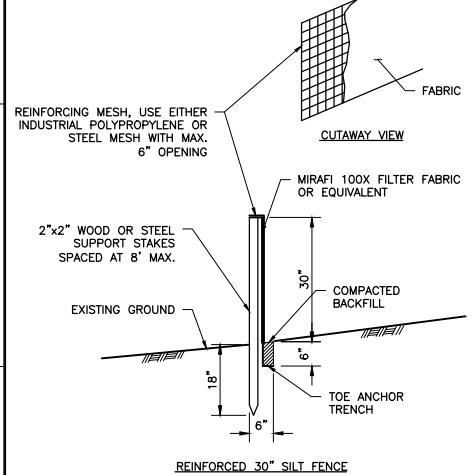


SUBMITTAL RECORD		
NO	DATE	DESCRIPTION
1	5/2013	ISDR DAM MODIFICATION PERMIT
2	2/2014	ISSUED FOR CONSTRUCTION
3	2/4/2015	AS-BUILT CONSTRUCTION DRAWINGS

REVISION RECORD		
NO	DATE	DESCRIPTION



SITE PLAN
SCALE: 1" = 100'



DETAIL 1
30" SILT FENCE DETAIL
N.T.S.

- SILT FENCE NOTES:**
1. SILT FENCE SHALL BE PLACED ON LEVEL GRADE, WHERE POSSIBLE, AND BOTH ENDS OF THE SILT FENCE SHALL BE EXTENDED UP THE SLOPE.
 2. SILT FENCE SHALL NOT BE PLACED IN ANY AREA OF CONCENTRATED FLOW NOR IN AREAS WHERE ROCK OR ROCKY SOILS PREVENT THE FULL AND UNIFORM ANCHORING OF THE FENCE TOE.
 3. THE CONTRACTOR SHALL INSPECT THE SILT FENCE AFTER EVERY PRECIPITATION EVENT AND IMMEDIATELY REPAIR ANY DEFICIENCIES.
 4. THE CONTRACTOR SHALL REMOVE ACCUMULATED SEDIMENTS AS REQUIRED TO KEEP THE FENCE FUNCTIONAL. IN ALL CASES, THE CONTRACTOR SHALL REMOVE DEPOSITS WHERE ACCUMULATIONS REACH ONE-HALF THE ABOVE GROUND HEIGHT OF THE FENCE.
 5. THE CONTRACTOR SHALL IMMEDIATELY REPAIR ALL UNDERCUTTING OR EROSION OF THE ANCHOR TOE WITH A ROCK FILTER OUTLET.
 6. THE CONTRACTOR SHALL CONFORM TO ANY RECOMMENDATIONS BY THE MANUFACTURER FOR REPLACING FILTER FABRIC FENCE DUE TO WEATHERING.

LEGEND

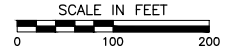
	MISCELLANEOUS FLOW PIPING
	BASE GRADE ELEVATION
	EXISTING PIPING
	EXISTING TREELINE
	EXISTING PONDS/STREAMS
	EXISTING FENCE
	EXISTING ACCESS ROAD
	EXISTING STORM WATER PIPING
	EXISTING UNDERGROUND PLANT FLOW PIPING
	EXISTING PLANT FLOW PIPING
	EXISTING INDEX CONTOURS
	EXISTING INTERMEDIATE CONTOURS
	EXISTING MONITORING WELL LOCATIONS
	PROPOSED CONSTRUCTION ACCESS ROAD
	PROPOSED EAST BERM MODIFICATIONS AREA BOUNDARY
	PROPOSED SILT FENCE
	PROPOSED GRADING LIMITS

AS-BUILT CONSTRUCTION PLANS


NOTE:
MONITORING WELLS EXIST WITHIN THE PROPOSED BERM MODIFICATION AREA. CONTRACTOR SHALL PROTECT EXISTING MONITORING WELLS WHILE PERFORMING BERM MODIFICATION ACTIVITIES.

REFERENCE:

1. TOPOGRAPHIC INFORMATION BASED UPON AERIAL SURVEY CONDUCTED BY SURDEX CORPORATION FLOWN ON SEPTEMBER 10, 2008.
2. EMBANKMENT AREA SURVEY RECEIVED BY CEC FROM DLZ ON MARCH 4, 2013 AND JANUARY 10, 2014.
3. IL DNR PERMIT NO. DS2014017-DAM I.D. NO. 50663
4. AS-BUILT SURVEY RECEIVED BY CEC FROM DLZ, DECEMBER 12, 2014.



* HAND SIGNATURE ON FILE



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555 Butterfield Road, Suite 300 - Lombard, IL 60148
Ph: 630.963.6026 · 877.963.6026 · Fax: 630.963.6027
www.cecinc.com

DYNEGY MIDWEST GENERATION, INC.
HENNEPIN POWER STATION
EAST BERM MODIFICATION
HENNEPIN, ILLINOIS

DRAWN BY: DFB	CHECKED BY: MDJ	APPROVED BY: MDJ	DATE: FEBRUARY 2015
DWS SCALE: AS NOTED		PROJECT NO: 132-650	

PROPOSED SITE PLAN

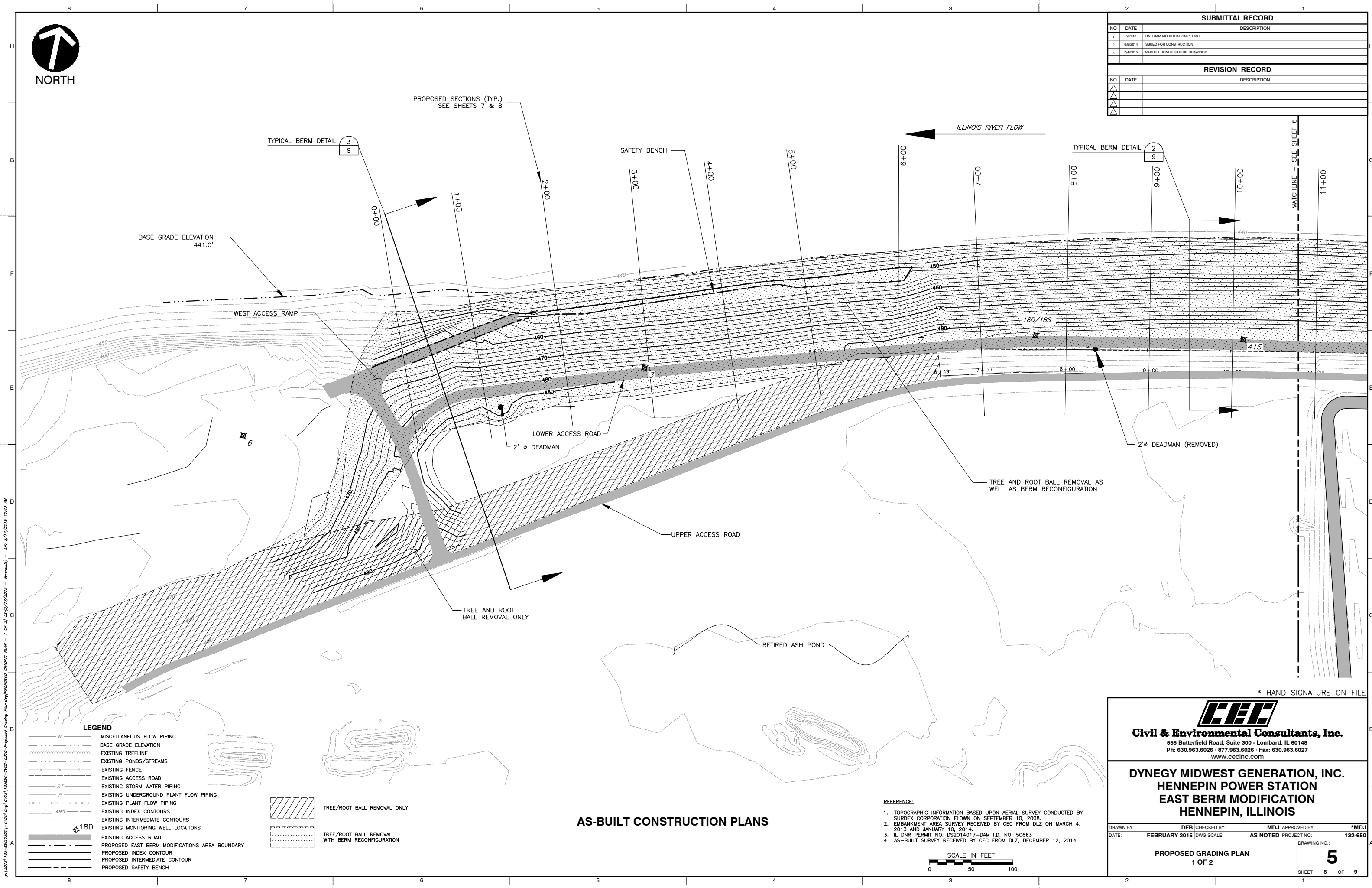
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SHEET 4 OF 9

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SUBMITTAL RECORD		
NO	DATE	DESCRIPTION
1	5/20/13	IGNR DAM MODIFICATION PERMIT
2	6/9/2014	ISSUED FOR CONSTRUCTION
3	2/4/2015	AS-BUILT CONSTRUCTION DRAWINGS

REVISION RECORD		
NO	DATE	DESCRIPTION



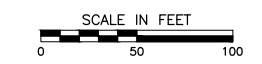
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 P:\13015\132-650-0001-CADD\DWG\13015\132-650-0001-Proposed Grading Plan.dwg (1/17/2015 10:43 AM) - LP: 2/17/2015 10:43 AM

LEGEND


- W MISCELLANEOUS FLOW PIPING
- BASE GRADE ELEVATION
- - - EXISTING TREELINE
- - - EXISTING PONDS/STREAMS
- - - EXISTING FENCE
- - - EXISTING ACCESS ROAD
- ST EXISTING STORM WATER PIPING
- P EXISTING UNDERGROUND PLANT FLOW PIPING
- 495 EXISTING PLANT FLOW PIPING
- ▲ 18D EXISTING INTERMEDIATE CONTOURS
- ▲ 18D EXISTING MONITORING WELL LOCATIONS
- EXISTING ACCESS ROAD
- PROPOSED EAST BERM MODIFICATIONS AREA BOUNDARY
- PROPOSED INDEX CONTOUR
- PROPOSED INTERMEDIATE CONTOUR
- PROPOSED SAFETY BENCH
- ▨ TREE/ROOT BALL REMOVAL ONLY
- ▨ TREE/ROOT BALL REMOVAL WITH BERM RECONFIGURATION

AS-BUILT CONSTRUCTION PLANS

- REFERENCE:**
1. TOPOGRAPHIC INFORMATION BASED UPON AERIAL SURVEY CONDUCTED BY SURDEX CORPORATION FLOWN ON SEPTEMBER 10, 2008.
 2. EMBANKMENT AREA SURVEY RECEIVED BY CEC FROM DLZ ON MARCH 4, 2013 AND JANUARY 10, 2014.
 3. IL DNR PERMIT NO. DS2014017-DAM I.D. NO. 50663
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DYNEGY MIDWEST GENERATION, INC.
HENNEPIN POWER STATION
EAST BERM MODIFICATION
HENNEPIN, ILLINOIS

DRAWN BY: DFB	CHECKED BY: MDJ	APPROVED BY: *MDJ	
DATE: FEBRUARY 2015	DWG SCALE: AS NOTED	PROJECT NO: 132-650	

PROPOSED GRADING PLAN
1 OF 2

5
SHEET 5 OF 9



PROPOSED SECTIONS (TYP.)
SEE SHEETS 7 & 8

ILLINOIS RIVER FLOW

BASE GRADE ELEVATION
441.0'

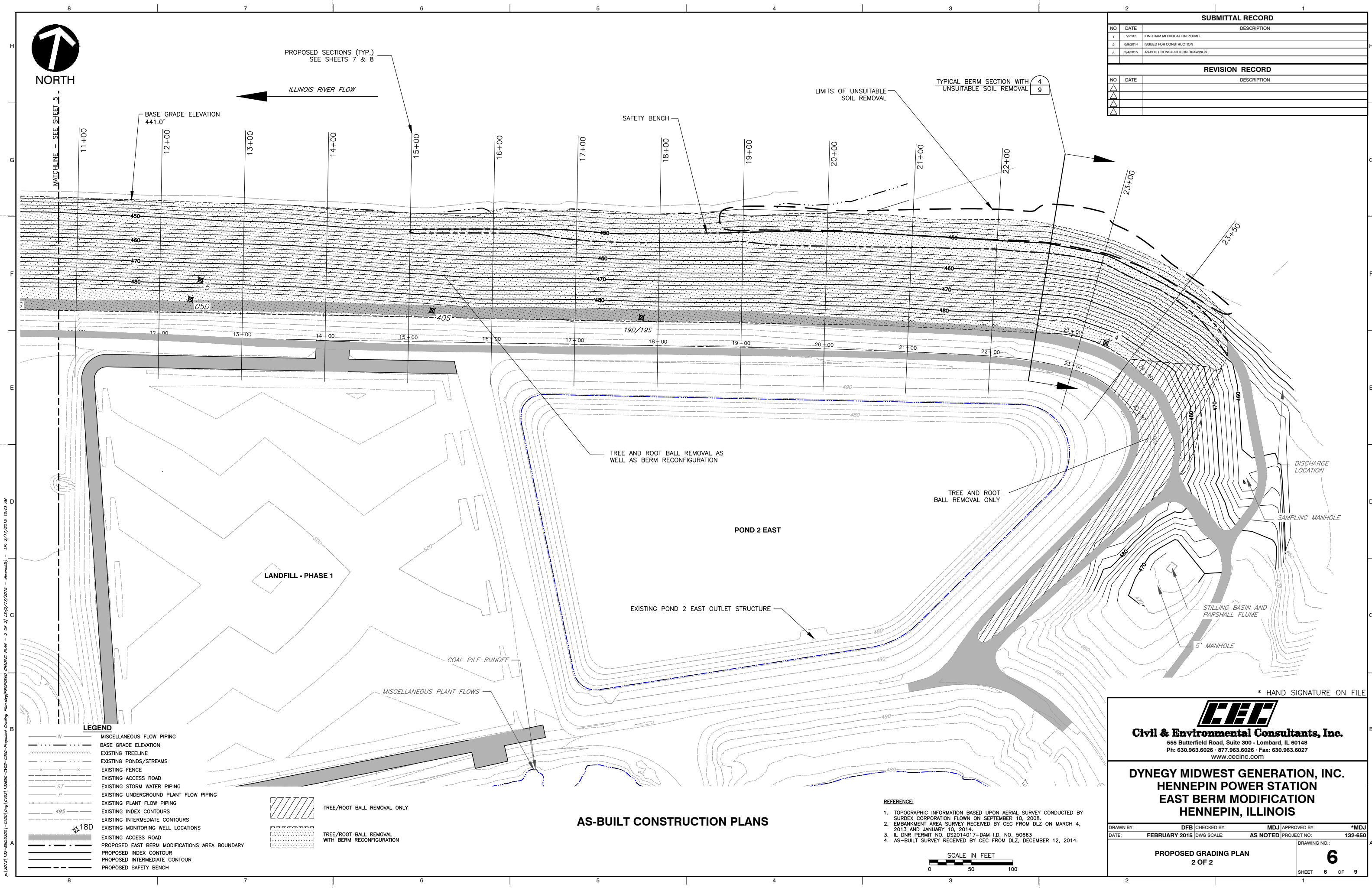
SAFETY BENCH

LIMITS OF UNSUITABLE
SOIL REMOVAL

TYPICAL BERM SECTION WITH
UNSUITABLE SOIL REMOVAL

SUBMITTAL RECORD		
NO	DATE	DESCRIPTION
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2	6/9/2014	ISSUED FOR CONSTRUCTION
3	2/4/2015	AS-BUILT CONSTRUCTION DRAWINGS

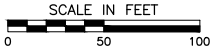
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AS-BUILT CONSTRUCTION PLANS

- REFERENCE:
1. TOPOGRAPHIC INFORMATION BASED UPON AERIAL SURVEY CONDUCTED BY SURDEX CORPORATION FLOWN ON SEPTEMBER 10, 2008.
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HENNEPIN POWER STATION
EAST BERM MODIFICATION
HENNEPIN, ILLINOIS

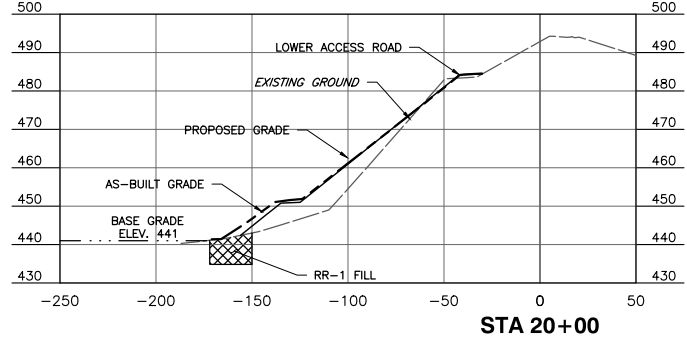
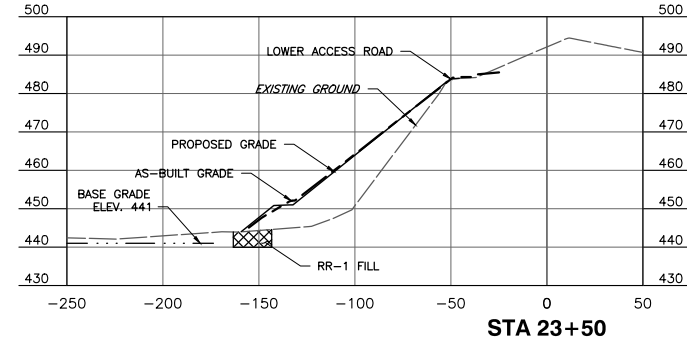
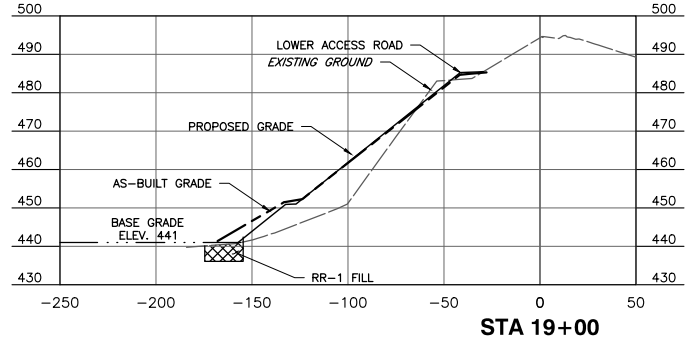
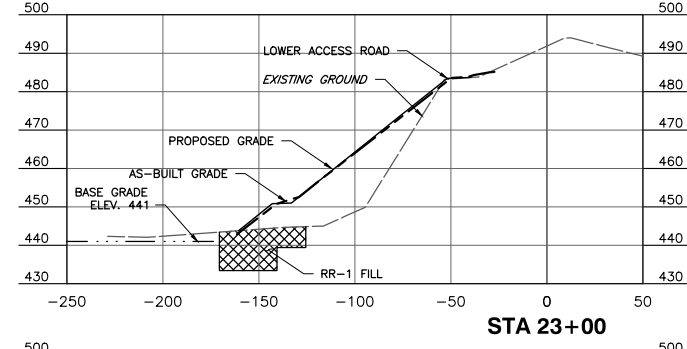
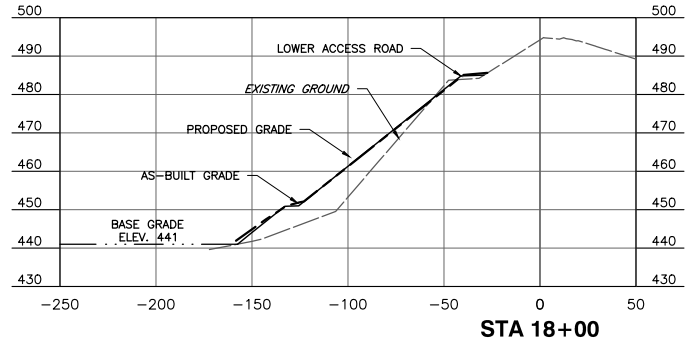
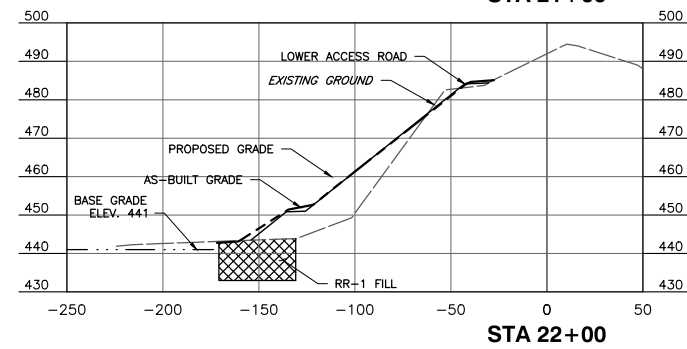
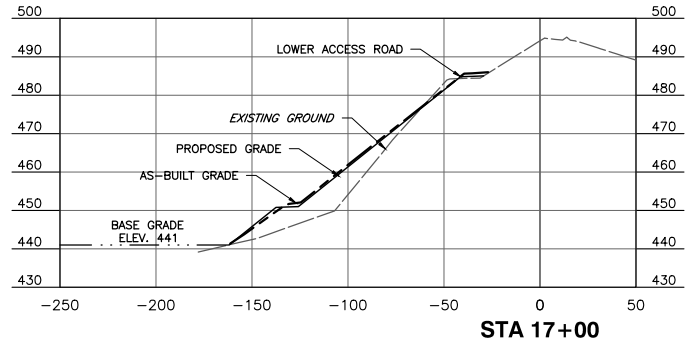
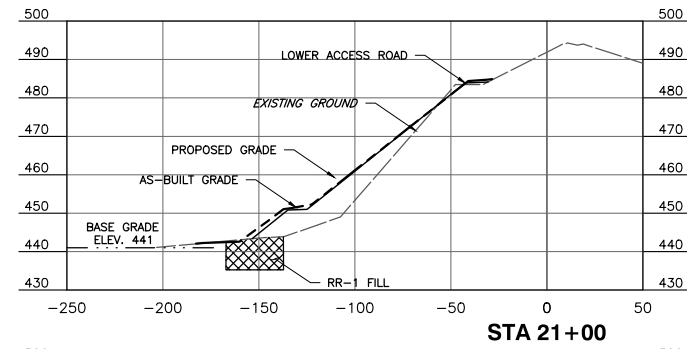
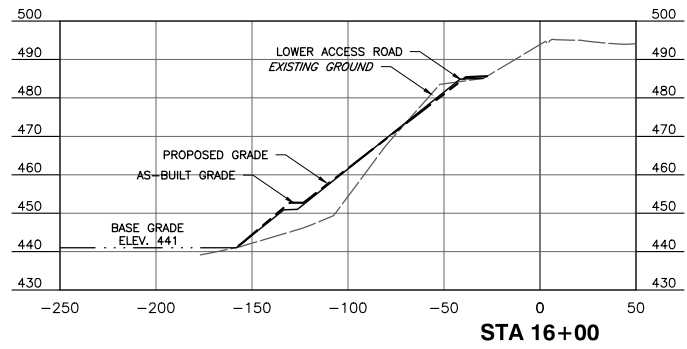
DRAWN BY: DFB	CHECKED BY: MDJ	APPROVED BY: *MDJ
DATE: FEBRUARY 2015	DWG SCALE: AS NOTED	PROJECT NO: 132-650

PROPOSED GRADING PLAN
2 OF 2

DRAWING NO.: **6**
SHEET 6 OF 9

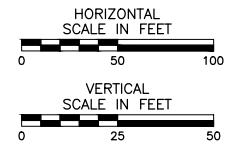
SUBMITTAL RECORD		
NO	DATE	DESCRIPTION
1	5/2013	IGNR DAM MODIFICATION PERMIT
2	6/9/2014	ISSUED FOR CONSTRUCTION
3	2/4/2015	AS-BUILT CONSTRUCTION DRAWINGS

REVISION RECORD		
NO	DATE	DESCRIPTION



- REFERENCE:
1. TOPOGRAPHIC INFORMATION BASED UPON AERIAL SURVEY CONDUCTED BY SURDEX CORPORATION FLOWN ON SEPTEMBER 10, 2008.
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 3. IL DNR PERMIT NO. DS2014017-DAM I.D. NO. 50663
 4. AS-BUILT SURVEY RECEIVED BY CEC FROM DLZ, DECEMBER 12, 2014.

AS-BUILT CONSTRUCTION PLANS



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DYNEGY MIDWEST GENERATION, INC.
HENNEPIN POWER STATION
EAST BERM MODIFICATION
HENNEPIN, ILLINOIS

DRAWN BY: DFB | CHECKED BY: MDJ | APPROVED BY: *MDJ
 DATE: FEBRUARY 2015 | DWG SCALE: AS NOTED | PROJECT NO: 132-650

PROPOSED SECTIONS
 STA 16+00 TO 23+50

DRAWING NO.: **8**
 SHEET 8 OF 9

p:\2015\132-650\2015-CAD\DWG\132-650-012-C100-Proposed Grading Plan.dwg (PROCESS SECTIONS (2)) (LS/2/17/2015 - 10:43 AM)



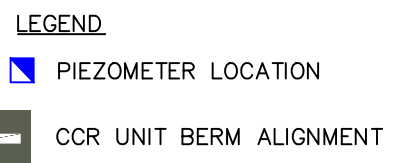
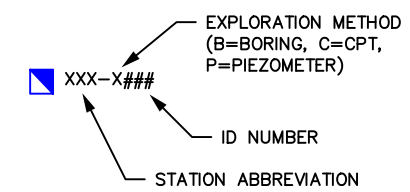
Appendix C: Hennepin Power Station Piezometer Locations

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**HENNEPIN
ASH POND
NO. 2**

**HENNEPIN
EAST ASH POND**



PIEZOMETER LOCATION



APPROXIMATE SCALE FEET

SOURCE:
MAP PROVIDED BY GOOGLE EARTH PRO 2015

DYNEGY MIDWEST GENERATION, LLC		PROJECT NO. 60439752
AECOM		
DRN. BY:djd October 2015 DSGN. BY:eg CHKD. BY:eg	Hennepin Ash Pond No. 2 Piezometer Locations	FIG. NO. 2A

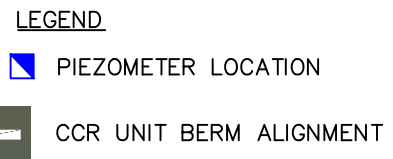
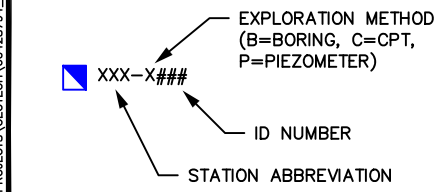
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HEN-P006

HEN-P007

**HENNEPIN
EAST ASH POND**



APPROXIMATE SCALE FEET

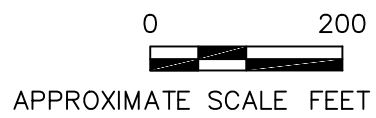
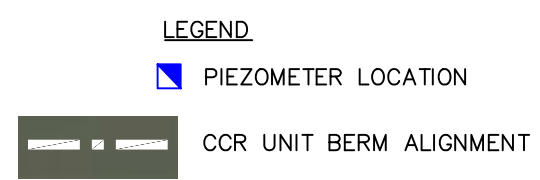
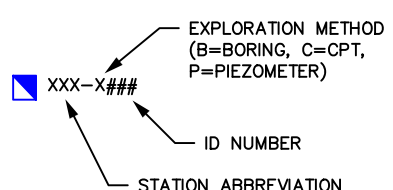
SOURCE:
MAP PROVIDED BY GOOGLE EARTH PRO 2015

DYNEGY MIDWEST GENERATION, LLC		PROJECT NO. 60439752
AECOM		
DRN. BY:djd October 2015 DSGN. BY:eg CHKD. BY:eg	Hennepin East Ash Pond Piezometer Locations	FIG. NO. 2B

File: P:\PROJECTS\GEOTECH\60428794_DYNEGY\CCR\04\TASKS\00_PROGRAM_TASKS\1.0_TASK_1_INITIAL_UNIT_ASSESSMENT\CCR_FACT_SHEETS\SITE_MAPS\FIGURE_2A-2D_PIEZOMETER_LOCATION_PLAN (HENNEPIN).DWG Last edited: NOV. 03. 15 3:11 p.m. by: david_deguire



SOURCE:
 MAP PROVIDED BY GOOGLE EARTH PRO 2015



DYNEGY MIDWEST GENERATION, LLC		PROJECT NO. 60439752
AECOM		
DRN. BY:djd October 2015 DSGN. BY:eg CHKD. BY:eg	Hennepin Old West Ash Pond (Pond No. 1 and Pond No. 3) Piezometer Locations	FIG. NO. 2C

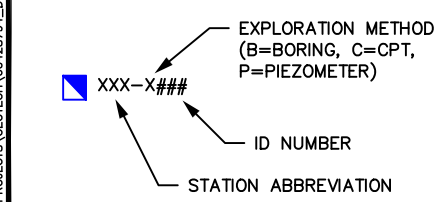
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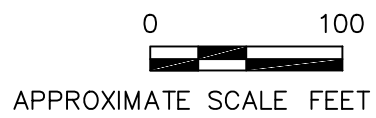
**HENNEPIN
 OLD WEST
 POLISHING POND**

HEN-P001

HEN-P002



- LEGEND**
- PIEZOMETER LOCATION
 - CCR UNIT BERM ALIGNMENT




SOURCE:
 MAP PROVIDED BY GOOGLE EARTH PRO 2015

DYNEGY MIDWEST GENERATION, LLC	PROJECT NO. 60439752	
AECOM		
DRN. BY:djd October 2015 DSGN. BY:eg CHKD. BY:eg	Hennepin Old West Polishing Pond Piezometer Locations	FIG. NO. 2D



Appendix D: Specification J-2616, Rev. A, Primary Ash Pond Modifications



Sargent & Lundy^{LLC}

**DYNEGY MIDWEST GENERATION
HENNEPIN POWER STATION**

**SPECIFICATION J-2616, REV. A
PERMIT APPLICATION**

PRIMARY ASH POND MODIFICATIONS

Prepared By:
Sargent & Lundy, LLC
55 East Monroe Street
Chicago, Illinois 60603

PRIMARY ASH POND MODIFICATIONS

ISSUE SUMMARY

Rev.	Purpose of Issue	Date	Sections Affected
A	Spec No. J-2616 Released for Permit Application	02/14/03	All

CERTIFICATION OF SPECIFICATION
FOR
PRIMARY ASH POND MODIFICATION

I certify that this Specification was prepared by me or under my supervision and that I am a registered professional engineer under the laws of the State of Illinois.

Sargent & Lundy LLC's Illinois Department of Professional Regulation registration number is 184-000106.

Certified By: Ronald Cook Date: Feb 14, 2003



EXP. 11-30-03

Seal

Revision: _____ Certified By: _____ Date: _____

PRIMARY ASH POND MODIFICATIONS

TABLE OF CONTENTS

Notes:

- (1) Where Division and/or Sections are not included, work under the unlisted headings is not part of the Work.
- (2) This Table of Contents will indicate the date of issue for the latest complete issue or revision issue of each section and any subsequent revision issue thereto.
- (3) The numbering and subsequent Revisions to the Specification are in sequence with the previously issued Revision mark number.

<u>SECTION</u>	<u>DATE OF ISSUE</u>	<u>LATEST ISSUE/REVISION</u>
PCTC 08003 Fabric Formed Concrete Mats	02/14/03	A
PCTC 12001 Temporary and Permanent Seeding (Illinois)	02/14/03	A
PCTC 36007 Crushed Stone Surfacing for Unpaved Roads, Parking Lots, and Laydown Areas (IDOT)	02/14/03	A
PCTC 54005 Earthwork and Clay Lining for a Clay/Geomembrane Lined Ash Pond	02/14/03	A
PCTC 56008 Polypropylene Geomembrane Liner for a Pond	02/14/03	A
PCTC 57001 Geotextile for Lined Ponds	02/14/03	A
PCTC 60008 Quality Assurance for Installation of Earthwork and Clay Lining for the Ash Pond	02/14/03	A



FABRIC FORMED CONCRETE MATS

ISSUE SUMMARY

Rev.	Purpose of Issue	Date	Sections Affected	Prepared By	Reviewed By	Approved By
A	Permit Application	02/14/03	ALL	<i>Ronald Cook</i>	<i>Daniel C. Kowik</i>	<i>Ronald Cook</i>

FABRIC FORMED CONCRETE MATS

TABLE OF CONTENTS

Notes:

- (1) This Table of Contents will indicate the date of issue for the latest complete issue or revision issue of each section and any subsequent revision issue thereto.
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	Page
1.0 Scope of Work	1
1.1 Work Included	1
2.0 Codes and Standards	1
2.1 ASTM – American Society for Testing and Materials.....	1
3.0 Supplier’s Drawings and Data Submittals.....	2
3.1 Submittals Prior to Installation	2
3.2 Submittals During and After Installation	3
4.0 Construction Quality Assurance.....	3
4.1 Testing.....	4
4.1.1 Independent Testing Service	4
4.1.2 Concrete Grout Testing	4
5.0 Materials.....	5
5.1 Fabric Design.....	5
5.2 Fiber and Fabric Material	5
5.3 Fabric Assembly	7
5.4 Concrete Grout	7
5.5 Acceptable Materials.....	7
6.0 Execution.....	7



6.1	Acceptance and Storage at the Project Site	7
6.1.1	Handling of Rolls.....	7
6.1.2	Storage at the Field Site	8
6.2	Inspection upon Delivery	8
6.3	Fabric Placement.....	8
6.4	Concrete Injection.....	8

Fabric Formed Concrete Mats - Technical Specification and Optional Features/Accessories

1.0

Scope of Work

The intent of this specification is to define the material and installation requirements for fabric formed concrete mats installed in accordance with the Design Drawings, technical data and as specified herein.

1.1

Work Included

The work shall include, but not be limited to, the following items as indicated:

- A. Preparation and grading of surfaces to receive fabric mats.
- B. Placing fabric mats and filling them with a pumpable sand/cement slurry to form a stable erosion protection system.
- C. Offsite disposal of excess or unsuitable materials and debris.

2.0

Codes and Standards

- A. Standards, specifications, manuals, codes and other publications of nationally recognized organizations and associations are referenced herein. Methods, equipment and materials specified herein shall comply with the specified and applicable portions of the referenced documents, in addition to federal, state or local codes having jurisdiction.
- B. References to these documents are to the latest issue date of each document, unless otherwise indicated, together with the latest additions, addenda, amendments, supplements, etc., thereto, in effect as of the date of contract for the work.
- C. Abbreviations listed indicate the form used to identify the reference documents in the specification text.

2.1

ASTM – American Society for Testing and Materials

- A. ASTM C 31 – Standard Practice for Making and Curing Concrete Test Specimens in the Field.
- B. ASTM C 39 – Standard Test Method for Compressive Strength of Cylindrical Concrete Specimens.
- C. ASTM C 143 – Standard Test Method for Slump of Hydraulic Cement Concrete.
- D. ASTM C 172 – Standard Practice for Sampling Freshly Mixed Concrete.
- E. ASTM C 173 – Standard Test Method for Air Content of Freshly Mixed Concrete by the Volumetric Method.

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- F. ASTM C 231 – Standard Test Method for Air Content of Freshly Mixed Concrete by the Pressure Method.
- G. ASTM C1064 – Standard Test Method for Temperature of Freshly Mixed Portland-Cement Concrete.
- H. ASTM D 543 – Standard Practices for Evaluating the Resistance of Plastics to Chemical Reagents.
- I. ASTM D 751 – Standard Test Methods for Coated Fabrics.
- J. ASTM D 792 – Standard Test Methods for Density and Specific Gravity (Relative Density) of Plastics by Displacement.
- K. ASTM D1777 – Standard Test Method for Thickness of Textile Materials.
- L. ASTM D2101 – Standard Test Method for Tensile Properties of Single Man-Made Textile Fibers Taken From Yarns and Tows.
- M. ASTM D3776 – Standard Test Methods for Mass Per Unit Area (Weight) of Fabric.
- N. ASTM D3786 – Standard Test Method for Hydraulic Bursting Strength of Knitted Goods and Nonwoven Fabrics (Mullen Burst).
- O. ASTM D3787 – Standard Test Method for Bursting Strength of Knitted Goods: Constant-Rate-of-Traverse (CRT) Ball Burst Test.
- P. ASTM D3885 – Standard Test Method for Abrasion Resistance of Textile Fabrics.
- Q. ASTM D4355 – Standard Test Methods for Deterioration of Geotextiles by Exposure to Light, Moisture and Heat in a Xenon Arc Type Apparatus.
- R. ASTM D4491 – Standard Test Methods for Water Permeability of Geotextiles by Permittivity.
- S. ASTM D4533 – Standard Test Method for Trapezoid Tearing Strength of Geotextiles.
- T. ASTM D4632 – Standard Test Method for Grab Breaking Load and Elongation of Geotextiles.
- U. ASTM D5034 – Standard Test Method for Breaking Strength and Elongation of Textile Fabrics (Grab Test).
- V. ASTM D5035 – Standard Test Method for Breaking Strength and Elongation of Textile Fabrics (Strip Method).

3.0

Supplier's Drawings and Data Submittals

- A. Supplier shall submit drawings and data as specified. Supplier's drawings and data shall be submitted via electronic medium in a format compatible for importing into the Buyer's information systems specified by the Buyer.

3.1

Submittals Prior to Installation

The Supplier shall submit the following items at least 30 days prior to scheduled delivery of materials:

- A. Manufacturer's literature providing specifications on the fabric mats that will be supplied.

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- B. Manufacturer's certification that the fabric mats to be supplied comply with the requirements of this Technical Specification.
- C. Manufacturer's Quality Control and Construction Quality Control Plans. The MQC Plan shall state the frequency that index tests are performed on the fabric mat during manufacturing.
- D. If requested by the Buyer, four samples of each fabric mat suitable for testing.
- E. Required concrete grout slurry mix design, including requirements for compressive strength, slump, air content and maximum temperature.

3.2

Submittals During and After Installation

The Supplier shall submit the following items on a daily basis during installation and a complete set of data within 30 days of the completion of the work:

- A. Results of tests performed on the concrete grout fill.

4.0

Construction Quality Assurance

- A. The Supplier shall examine the areas and conditions under which the work is to be installed and notify Buyer in writing of conditions detrimental to the proper and timely completion of the work that have changed from the time of the bidder's walkdown.
- B. Material and installation procedures are subject to inspection and tests conducted by an Independent Testing Service employed by the Buyer. Such inspections and tests will not relieve the Supplier of responsibility for providing material and installation procedures in compliance with specified requirements. The Buyer reserves the right, at any time before final acceptance, to reject material not complying with the specified requirements.
- C. The Supplier shall correct deficiencies in the work which inspections and laboratory test reports have indicated to be not in compliance with requirements. The Supplier shall perform additional tests, at his expense, as may be necessary to reconfirm any noncompliance of the original work, and as may be necessary to show compliance of corrected work.
- D. The Supplier shall promptly correct errors or flaws in material or placement of the protection mats identified during construction. The Supplier shall make immediate substitution of non-complying component or make field changes to make the non-complying component acceptable. Whether the correction is made by substitution or field correction, it shall be performed without cost to the Buyer.

4.1 Testing

4.1.1 Independent Testing Service

An Independent Testing Service shall perform the following:

- A. Test material for the concrete slurry fill and prepare initial test cylinders in accordance with the requirements specified herein.
- B. Prepare test cylinders and determine the compressive strength of job concrete fill test cylinders.

4.1.2 Concrete Grout Testing

- A. Obtaining and testing concrete grout shall be by the Independent Testing Service in accordance with the following specifications:
 - Sampling freshly mixed grout shall be done in accordance with ASTM C172.
 - Making and curing concrete test specimens shall be in accordance with ASTM C31.
 - Slump test shall be in accordance with ASTM C143.
 - Air Content tests shall be in accordance with ASTM C173 or ASTM C231.
 - Tests for the temperature of the freshly mixed grout shall be in accordance with ASTM C1064.
 - Compressive strength test shall be in accordance with ASTM C39.
- B. The frequency of testing shall be as directed by Buyer as follows:
 - At least one test shall be made for each day's placement of grout, but not less than once for each 100 cubic yards or part thereof placed.
 - A test shall consist of a minimum of four cylinders taken from the same truck. One 7-day and two 28-day tests shall be performed by the laboratory with results submitted to the Buyer as soon as possible. One spare cylinder shall be made and used as directed by the Buyer.
 - A slump test and air content test shall be performed on every 100 cubic yards of concrete grout.
 - The temperature of each 100 cubic yards shall be recorded in the field prior to placement. If the concrete grout temperature is in excess of 100°F, the concrete shall be rejected.

5.0 Materials

5.1 Fabric Design

- A. Fabric-forming material shall consist of double-layer, open-selvage fabric joined in a mat configuration. The fabric shall be woven of 100% continuous multi-filament nylon fiber of which 50% by weight shall be bulk textured fiber. The use of staple yarns will not be permitted.
- B. The fabric shall be woven in such a manner as to provide interwoven points of attachment on spaced centers. These points of attachment shall serve to control the thickness of the finished product and to also act as a filter point to provide relief of hydrostatic uplift pressure beneath the completed revetment. The fabric shall be woven in a basket or other open pattern to provide permeability at the filter points and the main fabric field.
- C. The spacing of the filter points is indicated on the Design Drawings. This spacing will result in an average revetment thickness that is consistent with the average thickness published by the manufacturer for the designated style specified.

5.2 Fiber and Fabric Material

- A. The warp fiber shall be 1260 Denier Nylon, 18.5 ends/inch per single layer and the fill fiber shall be 1900 Denier Nylon, 14 picks/inch per single layer. The fiber and fabric material shall meet the minimum requirements listed in Table 1.

TABLE 1
MATERIAL PROPERTIES

PROPERTY	ASTM TEST METHOD	MINIMUM TEST VALUE
Fiber count	-	0.164 g/m
Trapezoidal tear breaking force on the warp fiber at 70% elongation	D 4533	80 lbs/in
Trapezoidal tear breaking force on the fill fiber at 70% elongation	D 4533	40 lbs/in
Density	D 792	1.00 g/cm ³
Fiber dry breaking strength at 48% elongation	D 2101	20 lbs
Fiber wet breaking strength at 53% elongation (soaked in water for 2 hours)	D 2101	19 lbs
Tensile strength in the warp direction after exposure to 300 hours of Ca (OH) at a pH of 10	D 543	180 lbs/in
Tensile strength in the warp direction after exposure to 300 hours of H ₂ SO ₄	D 543	170 lbs/in
Tensile breaking strength in the warp direction on a strip of the fabric at 39% elongation ⁽¹⁾	D 5034, D 5035	160 lbs/in
Tensile breaking strength in the fill direction on a strip of the fabric at 34% elongation ⁽¹⁾	D 5034, D 5035	190 lbs/in
Mass/unit area for a single layer of fabric	D 3776	7.8 oz/sq yd
Thickness of a single layer of fabric	D 1777	31 mils
Falling head permittivity of two layers of fabric woven together	D 4491	0.28 s ⁻¹ 0.04 cm/s ⁽³⁾
Falling head permittivity of a single layer of fabric	D 4491	1.3 s ⁻¹ 0.12 cm/s
Seam strength ⁽²⁾	D 751	35 lbs/in
Abrasion resistance in the warp direction	D 3885	160 lbs/in
Grab strength in the warp direction at 31% elongation	D 4632	350 lbs
Grab strength in the fill direction at 41% elongation	D 4632	275 lbs
Breaking strength in the warp direction after exposure to 500 hours of UV light	D 4355	190 lbs/in
Mullen burst test	D 3786	750 psi
Puncture test	D 3787	80 lbs

Notes for Table 1:

- (1) 3" x 8" sample gripped along full width of the specimen with 3" of separation between grips. Strip test to be performed on single layer of fabric at cross-head speed of 5 inches per minute.
- (2) Seam centered between grips 3" apart and gripped the full width of the specimen.

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- (3) Applies to Filter Points only

5.3

Fabric Assembly

- A. Adjacent fabric panels shall be connected by sewing or by means of zipper.
- B. The two top layers of fabric and the two bottom layers of fabric shall be joined separately permitting full mat thickness between the two parallel seams. A single seam in which all four layers of the fabric are joined at one point will not be permitted.
- C. If required, grout stops may be installed parallel to and in between individual mill widths at predetermined intervals to regulate the flow of the concrete fill. Grout stops shall be so designed as to produce full mat thickness along the full length of the grout stop.

5.4

Concrete Grout

- A. The concrete grout shall consist of a mixture of Portland cement, fine aggregate and water so proportioned and mixed as to provide a readily pumpable slurry.
- B. Admixtures and/or a pozzolan may be used with the approval of the Buyer. The use of superplasticizers and/or silica fume require special precautions and the approval of the Buyer.
- C. The hardened concrete shall exhibit a minimum compressive strength of 2,500 psi at 28 days when specimens are made and tested in accordance with the provisions of ASTM C 31 and ASTM C 39.

5.5

Acceptable Materials

The following companies manufacture products that meet the requirements of the specification:

- A. Fabriform Filter Point Fabric as manufactured by Construction Techniques, Inc., Cleveland, Ohio, 440-572-8300.
- B. Other approved by Buyer.

6.0

Execution

6.1

Acceptance and Storage at the Project Site

6.1.1

Handling of Rolls

- A. The method of off-loading the fabric at the project site shall not cause any damage to the fabric, its core, nor its protective covering.
- B. Any protective covering that is accidentally damaged or stripped off of a pallet or roll shall be immediately repaired or the pallet or roll shall be moved to an enclosed facility until the repair can be made.

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6.1.2

Storage at the Field Site

- A. The Buyer shall provide on-site storage space in a location near where the fabric will be placed such that on-site transportation and handling are minimized. The Supplier shall be responsible for protecting the stored material from theft and vandalism.
- B. Rolls or pallets of fabric shall be stored in such a manner that cores are not crushed, the fabric damaged, and as required to provide protection from exposure to ultraviolet light, inundation, mud, dirt, dust, puncture, cutting or any other damaging or deleterious condition.
- C. Outdoor storage of rolls or pallets shall not exceed the manufacturer's recommendations or longer than six months, whichever is less.

6.2

Inspection upon Delivery

- A. Upon delivery of the materials to the site, the Supplier shall conduct a visual inspection of all rolls of fabric for damage or defects. This inspection shall be done without unrolling any rolls unless damage to the inside of a roll is found or suspected.
- B. Any damage or defects shall be noted and immediately reported to the Buyer, the manufacturer and the carrier that transported the material. Any roll, or portion thereof, which, in the judgement of the Buyer, is seriously damaged, shall be removed from the project site and replaced with complying material at no additional cost to the Buyer.

6.3

Fabric Placement

- A. Prior to concrete injection, the fabric shall be positioned over a geotextile on the grade as indicated on the Design Drawings making appropriate allowances for contraction of the fabric mats as a result of injecting the concrete grout.
- B. Anchoring of fabric shall be as shown on the Design Drawings.
- C. Fabric panels may be factory assembled in predetermined sizes and joined together side-by-side at the project site by field sewing or by means of zipper closures attached to the upper and lower layers of the fabric. In no case will simple unattached butt joints between panels be allowed. Overlapping shall be allowed only if approved by the Buyer.

6.4

Concrete Injection

- A. Following placement of the fabric mats the specified concrete grout shall be injected between the top and bottom layers of the fabric through small slits cut in the upper layer of the fabric. The injection pipe shall be wrapped tightly at the point of injection with a strip of burlap, or similar material, during pumping to seal the joint between the injection pipe and the slit. After pumping, the burlap shall be pushed into the slit as the injection pipe is withdrawn in order to minimize spillage of the concrete slurry onto the surface of the revetment.

- B. The sequence of concrete slurry injection shall be such as to insure complete filling of the revetment-forming fabric to average thickness indicated by the manufacturer for the designated style specified on the Design Drawings.
- C. Foot traffic will not be permitted on the freshly pumped mat since such traffic will cause permanent indentations in the mat surface. Walk boards shall be used where necessary.
- D. Excess concrete slurry which has been inadvertently spilled on the mat surface shall be cleaned up with a broom and shovel. The use of a water hose to remove spillage from the surface of a freshly pumped mat will not be permitted.
- E. During concrete slurry injection, the mat thickness shall be measured by inserting a short piece of stiff wire through the crowns of the mats midway between the filter points at several locations from the crest to the toe of the slope. Any mat measurements less than 90% of the average of all thickness measurements shall be re-injected until the average thickness indicated for the style specified has been attained.

TEMPORARY AND PERMANENT SEEDING (ILLINOIS)

ISSUE SUMMARY

Rev.	Purpose of Issue	Date	Sections Affected	Prepared By	Reviewed By	Approved By
A	Permit Application	02/14/03	ALL	<i>Ronald Cook</i>	<i>Daniel C. Frank</i>	<i>Ronald Cook</i>

TEMPORARY AND PERMANENT SEEDING (ILLINOIS)

TABLE OF CONTENTS

Notes:

- (1) This Table of Contents will indicate the date of issue for the latest complete issue or revision issue of each section and any subsequent revision issue thereto.
- (2) The numbering and subsequent Revisions to the Specification are in sequence with the previously issued Revision mark number.

	Page
1.0 Scope of Work	1
1.1 Purpose and Use	1
1.2 Method of Seed and Mulch Application	1
1.3 Work Included	1
2.0 Codes and Standards	2
2.1 USDA-United States Department of Agriculture, Soil Conservation Service ..	2
2.2 ASTM-American Society for Testing and Materials	2
3.0 Supplier's Drawings and Data Submittals	2
3.1 Topsoil	2
3.2 Seed	3
3.3 Data on Materials as Applied	3
3.4 Binder Spray	3
3.5 Matting	3
3.6 Samples	3
4.0 Products	4
4.1 Top Soil	4
4.2 Seed	4
4.2.1 General Requirements	4

4.2.2	Seed Storage.....	5
4.2.3	Seed Mixture	5
4.3	Lime (Agricultural Ground Limestone).....	8
4.4	Fertilizer.....	8
4.5	Mulch.....	8
4.5.1	Straw Mulch.....	8
4.5.2	Wood Cellulose Fiber Mulch.....	8
4.5.3	Binder Sprays.....	9
4.6	Tackifier (Synthetic Binder).....	9
4.7	Inoculant	9
4.8	Matting for Erosion Control.....	9
5.0	Execution	10
5.1	Site Preparation	10
5.2	Limestone for pH Adjustment.....	10
5.3	Fertilizer.....	10
5.4	Tilling of Subsoil.....	10
5.5	Placing Topsoil.....	11
5.6	Seeding (Conventional Method).....	11
5.7	Mulching (Conventional Method).....	11
5.7.1	Straw Mulching.....	11
5.7.2	Anchoring Mulch Using a Mulch Anchoring Tool.....	12
5.7.3	Anchoring Mulch Using a Sprayed Liquid Binder.....	12
5.7.4	Repairing and Reseeding	12
5.8	Hydro seeding	13
5.9	Laying and Securing Matting.....	13
5.9.1	Laying and Securing Jute Matting.....	13

5.9.2	Laying and Securing Excelsior Matting	14
5.10	Construction Completed after Acceptable Seeding Dates	14
6.0	Protection	14
7.0	Maintenance	14

Temporary and Permanent Seeding (Illinois) – Technical Specification and Optional Features/Accessories

1.0 Scope of Work

The intent of this specification is to define the minimum requirements for material and work for establishing a vegetative cover by planting grass seed.

1.1 Purpose and Use

- A. All graded areas, slopes, and ditches which will not be paved or otherwise surfaced shall be provided with permanent seeding.
- B. Graded areas subject to erosion shall not remain unprotected for longer than 30 days. Temporary seeding shall be provided by the Supplier to protect graded areas from erosion where permanent protection is not scheduled to be installed for 2 to 12 months after grading is completed.

1.2 Method of Seed and Mulch Application

Seed may be spread by a conventional method of application such as broadcasting, grass drill, or cultipacker followed by an application of mulch or by a hydro seeding procedure consisting of spraying a slurry mixture of water, seed, mulch, fertilizer, and tackifier onto the prepared seedbed.

1.3 Work Included

- A. Furnish all materials.
- B. Subgrade preparation.
- C. Seedbed preparation, including placing topsoil and the addition of lime and fertilizer.
- D. Seeding using broadcast, grass drill, or the cultipacker method and mulching, or hydro seeding with a mixture that contains seed, mulch and a tackifier.
- E. Installation of matting where specified for erosion control.
- F. Protection.
- G. Maintenance.
- H. Repairing and reseeded.

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2.0

Codes and Standards

- A. Standards, specifications, manuals, codes and other publications of nationally recognized organizations and associations are referenced herein. Methods, equipment and materials specified herein shall comply with the specified and applicable portions of the referenced documents, in addition to federal, state or local codes having jurisdiction.
- B. References to these documents are to the latest issue date of each document, unless otherwise indicated, together with the latest additions, addenda, amendments, supplements, etc., thereto, in effect as of the date of Contract for the Work.
- C. Abbreviations listed indicate the form used to identify the reference documents in the Specification text.

2.1

USDA - United States Department of Agriculture, Soil Conservation Service

- A. USDA-SCS Soil Classification - Supplement to Soil Classification System (7th Approximation), SCS, USDA, Second Printing, March 1967.

2.2

ASTM - American Society for Testing and Materials

- A. C602 - Specification for Agricultural Liming Materials.
- B. D977 - Specification for Emulsified Asphalt.
- C. D2026 - Specification for Cutback Asphalt (Slow-Curing Type).
- D. D2027 - Specification for Cutback Asphalt (Medium-Curing Type).
- E. D2028 - Specification for Cutback Asphalt (Rapid-Curing Type).
- F. D2397 - Specification for Cationic Emulsified Asphalt.
- G. D5268 - Specification for Topsoil Used for Landscaping Purposes.

3.0

Supplier's Drawings and Data Submittals

Supplier shall submit drawings and data not less than 30 days before material is to be delivered. Supplier's drawings and data shall be submitted via electronic medium in a format compatible for importing into the Buyer's information systems specified by the Buyer.

3.1

Topsoil

- A. Topsoil Material:
 - A copy of laboratory reports on two representative samples of topsoil. Laboratory tests shall be performed for:
 - Percent deleterious material.
 - Total organic content.

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- Silt and clay contents.
- Sand content.
- pH.

B. If it is anticipated that topsoil stripped from either the present site or the borrow area will be used for permanent seeding, if requested by the Buyer, the Supplier shall provide two 50-pound samples to the Buyer's Testing Service for analyses.

3.2

Seed

- A. A certified copy of a statement signed by the seed supplier that each lot of seed has been tested by a recognized seed-testing laboratory within six months before the date of delivery to the plant site.
- B. A certified statement signed by the seed supplier that the maximum percentage of noxious weeds in the seed mixture complies with state law.

3.3

Data on Materials as Applied

As applied data on the following items:

- A. Seed mixture and seed application rate.
- B. Limestone application rate.
- C. Fertilizer type, trademark name (if any), chemical composition, and application rate.
- D. Mulch.
- E. Tackifier.

3.4

Binder Spray

Data on the binder spray (tackifier) to be used on straw mulch or with hydro seeding. If a synthetic binder (tackifier) will be used, the Supplier shall provide a complete set of Manufacturer's specifications at least 30 days prior to anticipated use. Manufacturer's specifications shall contain a description of the binder material, the recommended method of application, and the recommended application rate.

3.5

Matting

Catalog data on the proposed erosion control matting and Manufacturer's literature on the recommended method of installation.

3.6

Samples

If requested by the Buyer, submit a sample of each material designated by the Buyer for laboratory testing.

4.0 Products

4.1 Topsoil

- A. Topsoil shall consist of sandy clay loam, sandy loam, loam, clay loam, silty clay loam or silt loam as defined by the SCS Soil Classification System.
- B. Topsoil shall be relatively free from large roots, sticks, weeds, brush or stones larger than 1 inch in diameter or other litter and waste products. It shall have at least 90 percent passing the No. 10 sieve.
- C. The topsoil shall meet requirements of ASTM D5268 as follows:
- It shall contain not less than 2 percent nor more than 20 percent total organic matter.
 - It shall contain not less than 35 percent nor more than 70 percent silt and clay.
 - It shall contain not less than 20 percent nor more than 60 percent sand.
 - The pH of the sample shall not be lower than 5.0 nor higher than 7.5.
 - The percent deleterious material (rock, gravel, slag, cinder, roots, sod) shall not exceed 5 percent.

4.2 Seed

4.2.1 General Requirements

- A. Grasses, legumes, or cover crop seed of the type specified herein shall conform to the standards of the United States Department of Agriculture for seed certification.
- B. Seed or seeding mixtures shall be furnished in sealed bags or containers in accordance with standard commercial practice.
- C. Each bag or container shall be tagged or labeled in accordance with state law. As a minimum, the tag or label shall provide the following information:
- Name and address of the supplier.
 - Common name of seed.
 - Lot number.
 - Net weight.
 - Guaranteed percentage of germination.
 - Percentage of weed seed and inert material content.
- D. Seed which has become wet, moldy, or otherwise damaged in transit or storage will not be accepted.
- E. All seed furnished shall be free of primary noxious weed seed such as Russian or Canadian Thistle, European Birdweed, Johnson Grass and Leafy Spurge. The maximum allowable percentage of noxious weed seed in the seed mixture shall comply with state law.

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4.2.2

Seed Storage

If it is necessary to store seeds after their arrival on the site, they shall be stored in an approved weatherproof building in such a manner as to protect the seeds from deterioration and to permit easy access for inspection. The Buyer's approval for the storage building and the method of storage shall not relieve the Supplier of responsibility for the quality and fitness of the seeds at the time of their use.

4.2.3

Seed Mixture

- A. Seed species, rate per acre, and other data relevant to permanent seeding are given in Table 1.
- B. Seed species, rate per acre, and other data relevant to temporary seeding are given in Table 2.

TABLE I
 ACCEPTABLE MIXTURES FOR PERMANENT SEEDING

Mixture	Seed Species (1)	Seeding Rate, Pure Live Seed for Conventional Seed Application (2)		Suitable pH	Site Suitability			Acceptable Dates for Seeding
		Lbs. per acre	Lbs. per 1,000 sq. ft.		Sunny, Dry	Well Drained	Wet	
1	Smooth Bromegrass or Tall Fescue	30	0.75	6.0-7.5	X	X	X	4-1 to 6-1 8-1 to 9-1
			0.25					
2	Smooth Bromegrass or Tall Fescue	30	0.75	6.0-8.0	X	X	X	4-1 to 6-1 8-1 to 9-1
			0.50					
			0.35					
3	Crown Vetch	20	0.07	5.5-7.5	X	X	X	4-1 to 6-1 8-1 to 9-1
			0.35					
			0.35					
4	Smooth Bromegrass or Tall Fescue	15	0.35	5.5-7.5	X	X	X	4-1 to 6-1 8-1 to 9-1
			0.35					
			0.07					
	Ladino (optional)	3	0.07					

Notes: (1) Mixtures as defined by SCS for Illinois.

(2) Triple the seeding rate shown in the table when hydro seeding.

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TABLE 2
 ACCEPTABLE MIXTURES FOR TEMPORARY SEEDING

MIXTURE	SEED SPECIES	MAXIMUM WEED SEED (percentage)	SEEDING RATE PER ACRE	SUITABLE pH	PLANTING DEPTH	ACCEPTABLE DATES FOR SEEDING
1	Wheat	0.50	150 lbs	5.5 to 7.0	1" to 1 1/2"	3-1 to 5-15 7-1 to 10-15
2	Cereal Rye	0.50	150 lbs	5.5 to 7.0	1" to 1 1/2"	3-1 to 5-15 7-1 to 10-15
3	Spring Oats	0.50	100 lbs	5.5 to 7.0	1"	3-1 to 7-1
4	Perennial Ryegrass	0.50	40 lbs	5.0 to 7.5	1/4"	4-1 to 6-1 8-1 to 9-15

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4.3

Lime (Agricultural Ground Limestone)

Agricultural lime shall be flour grade meeting the requirements of ASTM C602.

4.4

Fertilizer

- A. Fertilizer shall be a standard brand commercial grade of inorganic fertilizer furnished in unopened containers. The material may be separate or in a mixture containing the percentage of total nitrogen, available phosphoric acid and water-soluble potash in the amounts specified. If materials are separate, the Buyer shall be present when the separate fertilizers are mixed in the field. The fertilizer shall be odor free.
- B. Fertilizer shall be supplied in one of the following forms:
- A dry free-flowing granular fertilizer suitable for application by an agricultural fertilizer spreader.
 - A soluble form that will permit complete suspension of insoluble particles in water, suitable for application by power sprayer.
- C. The following information shall be shown on the fertilizer container or on a tag attached thereto:
- Name and address of manufacturer.
 - Name, brand or trademark.
 - Number of net pounds of ready-mixed material in the package.
 - Chemical composition or analysis.
 - Guarantee of analysis.

4.5

Mulch

4.5.1

Straw Mulch

- A. Straw shall be stalks of small grain straw of wheat, rye, oats, barley or other approved grain. Straw shall be air dried and free of grain and noxious weed seed, other materials detrimental to plant life, and mold.
- B. Straw shall be seasoned before baling or loading. Straw mulch shall be suitable for spreading with mulch blower equipment.
- C. Old dry straw which breaks up in the crimping process instead of bending, or straw in such advanced stages of decomposition that it will smother or retard the normal growth of grass, is not acceptable.

4.5.2

Wood Cellulose Fiber Mulch

- A. Wood cellulose fiber shall be partly digested wood fibers.
- B. The material shall be dyed green.

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- C. The material shall not contain growth or organism inhibiting agents.
- D. The material shall be air-dried with a minimum of 30 percent of the fibers 3.7 mm (0.145 inch) or longer.

4.5.3

Binder Sprays

- A. Cutback Asphalt shall be in accordance with ASTM D2026 (Slow-Curing Type), ASTM D2027 (Medium-Curing Type) or ASTM D2028 (Rapid-Curing Type).
- B. Emulsified Asphalt shall be in accordance with D977 (Emulsified Asphalt) or D2397 (Cationic Emulsified Asphalt).

4.6

Tackifier (Synthetic Binder)

- A. Tackifier material shall be an acrylic copolymer or a polyvinyl acetate emulsion in a liquid form. The material may contain additives to enhance its ability to penetrate the soil.
- B. The material shall be non-toxic, non-flammable, and biodegradable.
- C. Approved Materials:
 - Soil Seal Concentrate manufactured by Soil Seal Corp., 1111 W. Sixth St., Los Angeles, California 90017, telephone number 213-481-7185.
 - Reinco Mulch Binder and Terra Tac manufactured by Rienco Mulch Binder Corp., 520 North Avenue, Plainfield, New Jersey 07060, telephone number 1-800-526-7687.
 - Aerospray 70 Binder manufactured by American Cyanamid Company, Mobile, Alabama 36601, telephone number 205-476-5800.

4.7

Inoculant

- A. The inoculant for treating legume seeds shall be a pure culture of nitrogen fixing bacteria prepared specifically for the species and shall not be used later than the date indicated on the container. A mixing medium, as recommended by the manufacturer, shall be used to bond the inoculant to the seed.
- B. All legumes not pre-inoculated shall be inoculated within 12 hours of seeding. If the seed was pre-inoculated more than 60 days prior to seeding then it must be reinoculated.

4.8

Matting for Erosion Control

- A. Matting for erosion control may be one of the following unless a specific matting is specified on the Design Drawings.
 - Jute mat shall be cloth of a uniform plain weave of undyed and unbleached single jute yarn, 48 inches in width, plus or minus 1 inch and weighing an average of 1.2 pounds per linear yard of cloth with a tolerance of plus or minus 5 percent, with approximately 78 warp ends per width of cloth and 41 weft ends per linear yard of cloth. The yarn shall be

of a loosely twisted construction having an average twist of not less than 1.6 turns per inch and shall not vary in thickness by more than one-half its nominal diameter.

- Excelsior mat shall be wood excelsior, 48 inches in width plus or minus 1 inch and weighing 0.8 pounds per square yard plus or minus 10 percent. The excelsior material shall be covered with a netting to facilitate handling and to increase strength.
 - Glass fiber matting of bonded textile glass fibers with an average fiber diameter of 8 to 12 microns, 2 to 4 inch strands of fiber bonded with phenol formaldehyde resin. Mat shall be roll type, water permeable, minimum thickness 1/4 inch, maximum thickness 1/2 inch, density not less than 3 pounds per cubic foot.
- B. Staples for anchoring soil stabilizing materials shall be No. 11 gauge wire or heavier. Their length shall be 6 to 10 inches. Ten inch long staples shall be used on loose, unstable soils.

5.0 Execution

5.1 Site Preparation

- A. Prior to seeding, install all erosion control facilities specified on the Design Drawings. These include: diversions, berms, sediment control traps, silt fences and straw bale dikes.
- B. Grade areas as specified on the Design Drawings. Gullied and uneven areas shall be smoothed before starting seedbed preparation.

5.2 Limestone for pH Adjustment

- A. The Supplier shall apply limestone as required to raise the pH of the subsoil. Apply a minimum of 4 tons of limestone per acre for clayey soils, 3 tons of limestone per acre for sandy loam, and 2 tons of limestone per acre for loamy sand or silty soils.
- B. Thoroughly work the limestone into the subsoil to a depth of 2 to 3 inches with a harrow or disk. The limestone may be applied prior to or concurrently with the fertilizer described.

5.3 Fertilizer

- A. The Supplier shall apply a 12-12-12 fertilizer to the subsoil at a rate of 300 pounds per acre.
- B. Work the fertilizer into the soil to a depth of 2 to 3 inches with a harrow, disk, or rake. On slopes, operate the disk or rake across the slope.
- C. If hydro seeding is used, the fertilizer may be added to the hydroseed mixture.

5.4 Tilling of Subsoil

Prior to placing the topsoil, scarify the subsoil to a depth of 3 inches immediately prior to spreading topsoil to ensure bonding of the topsoil and the subsoil. Repeat scarification in areas where equipment used for hauling and spreading topsoil has compacted the subsoil.

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5.5

Placing Topsoil

Note: topsoil does not have to be placed for temporary seeding. Topsoil must be placed prior to permanent seeding.

- A. Place topsoil during dry weather on a dry, unfrozen subgrade. Topsoil shall not be spread if it is frozen or muddy.
- B. Remove large pieces of organic matter and foreign non-organic material from topsoil while spreading. There shall be no large roots, branches or trash of any kind in the topsoil.
- C. Spread the topsoil to provide a compacted thickness of not less than 4 inches.
- D. Compact the topsoil with a roller not exerting more than 100 pounds per square inch. The topsoil must be loose enough for water infiltration and root penetration. The soil surface on slopes shall be roughened to catch seeds if they are to be broadcast.

5.6

Seeding (Conventional Method)

- A. Tables 1 and 2 list acceptable seed mixtures that may be used for seeding. The Supplier shall select a mixture from the appropriate table and plant within the dates shown in that table for that mixture.
- B. Apply seed uniformly at the rate shown in the appropriate table with a rangeland grass drill or cultipacker type seeder, or broadcast seed uniformly. The seeding methods and equipment shall be submitted to the Buyer for approval prior to beginning work.
- C. All seeders shall be calibrated and adjusted to sow seeds at the proper rate. Equipment shall be operated to ensure a complete and even coverage. Do not seed areas greater than that which can be mulched on the same day.
- D. Do not sow immediately following a rain, where the ground is too dry, during windy periods, or otherwise when conditions are not proper for seeding.
- E. No seeds shall be sown until the purity test has been completed for the seeds to be used and the tests show that the seed meets the noxious weed seed requirements.
- F. Within 12 hours, all seeded areas shall be rolled at right angles to the runoff with a cultipacker or approved roller to compact the seedbed and place the seed in contact with the soil. The optimum depth for planting shall be 1/4 inch. Rolling is not required if the seeding equipment is equipped with a roller that achieves the desired compaction or a grass drill has been used. Note: For temporary seeding planted without topsoil, the optimum planting depth is shown in Table 2.

5.7

Mulching (Conventional Method)

5.7.1

Straw Mulching

- A. All seeded areas shall be mulched with straw mulch within 24 hours after seeding. The mulch may be hand or machine applied. The mulch shall be uniformly applied in a loose enough condition to permit air to circulate, but compact enough to reduce erosion. About 25 percent of

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the solid surface should show through the mulch. If baled mulch material is used, care shall be taken that the material is in a loosened condition and contains no lumps or knots of compacted material.

- B. Straw mulch shall be applied at the rate of 2 tons per acre, or 75 to 100 (two bales) pounds per 1,000 square feet.
- C. Straw mulch shall be anchored immediately after placement to minimize loss by wind or water. Straw mulch shall be anchored using a mulch anchoring tool or by spraying with a liquid binder.

5.7.2

Anchoring Mulch Using a Mulch Anchoring Tool

- A. The mulch anchoring tool shall be designed to punch and anchor the mulch into the top 2 to 3 inches of soil at 6 inch intervals. As an alternative, a smooth disk set in a straight position may be used.
- B. On slopes flatter than 3 horizontal to 1 vertical, mulch anchoring shall cross the contour of the land (across slopes). On slopes steeper than 3 horizontal to 1 vertical, the mulch shall be anchored by tracking a bulldozer with 1-1/2 inch track cleats up and down slope making grooves running across the slope.

5.7.3

Anchoring Using a Sprayed Liquid Binder

- A. A sprayed liquid binder may be used in lieu of crimping to anchor the mulch. The binder may be sprayed into the mulch as it leaves the blower pipe or it may be applied as an over spray. If over sprayed, the binder spray should be heavier at the edges where wind catches the mulch, in valleys and at crests of banks. Binder shall be applied uniformly over the remainder of the area. Caution shall be used when spraying binder near areas occupied by construction personnel.
- B. Binder Spray shall be applied at the following rates:
 - Cutback asphalt - Rapid curing (RC-70, RC-250, and RC-800) or medium curing (MC-250 or MC-800). Apply 5 gallons per 1,000 square feet or 218 gallons per acre.
 - Emulsified asphalt - (SS-1, CSS-1, CMS-2, MS, RS-1, RS-2, CRS-1, and CRS-2). Apply 5 gallons per 1,000 square feet or 218 gallons per acre.
 - Synthetic binders - Synthetic binders such as Acrylic Dir (Agri-Tac), DCA-70, Petroset or Terra Tack may be used at rates recommended by the manufacturer to anchor mulch material.

5.7.4

Repairing and Reseeding

- A. Areas not mulched and anchored within 24 hours after seeding shall be reseeded and mulched.
- B. Areas not properly mulched, or damaged due to construction activities, shall be repaired, reseeded, and remulched.

5.8

Hydro Seeding

- A. Hydro seeding consists of spraying a slurry mixture of water, seed, fertilizer, mulch, and a tackifier on a prepared seed bed.
- B. The slurry mixture shall be mixed and applied using a hydraulic seeder. Hydraulic seeding equipment shall include a pump rated and operated at not less than 100 gallons per minute and 100 psi pressure. The tank shall have a mechanical agitator powerful enough to keep the slurry mixture in a uniform suspension in water.
- C. Hydrated lime **shall not** be added to the slurry mixture.
- D. The slurry mixture shall contain a maximum of 55 percent solids (125 pounds of solids per 100 gallons of water).
- E. The seed mixture shall be as specified in Table 1 or Table 2 except that the weight of seed in the slurry mixture shall be a minimum of three times the weight of pure live seed per acre specified in the appropriate table for conventional seed application.
- F. The slurry mixture shall contain a minimum of 1500 pounds of wood cellulose fiber mulch per acre or 2000 pounds of straw mulch per acre.
- G. The amount of tackifier provided per acre shall be in accordance with Manufacturer's recommendations.
- H. The slurry-mixture shall contain a minimum of 1000 pounds of grade 12-12-12 fertilizer per acre or the equivalent weight of chemicals if another grade is used.
- I. The soil surface shall be moist when the slurry mixture is applied.

5.9

Laying and Securing Matting

5.9.1

Laying and Securing Jute Matting

- A. Prepare the seed bed as specified and lime, fertilize, and seed, except that when using jute matting, apply approximately one-half of the seed after laying the mat.
- B. Most drainage channels will require multiple widths of jute matting. The total width shall be as specified on the Design Drawings. Unroll matting starting at the upper end of the channel allowing a 4 inch overlap of mattings along center of channel.
- C. Bury the top ends of jute matting in a narrow trench. Backfill the trench and tamp firmly to conform to channel cross-section. Secure the matting with a row of staples about 4 inches down slope from the trench. Spacing between staples shall be a maximum of 6 inches.
- D. Staple the 4 inch overlap in the center of the channel using an 18 inch spacing between staples. Before stapling the outer edges of the matting, make sure the matting is smooth and in firm contact with the soil. Staples shall be placed 2 feet apart along the outer edge of matting.
- E. Where one roll of jute matting ends and another begins, the end of the top strip shall overlap the upper end of the lower strip by 4 inches, shiplap fashion.

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- F. Where matting crosses erosion stops, reinforce with a double row of staples placed six (6) inches apart in a staggered pattern on either side of erosion stop. Likewise, overlaps joining the length of matting together and the discharge end of the matting liner should be similarly secured with 2 double rows of staples.

5.9.2

Laying and Securing Excelsior Matting

- A. Provide the same seedbed preparation as specified for jute matting with the exception that all seeding must be completed before laying excelsior matting.
- B. Bury the top ends of excelsior matting in a trench as described for jute matting. As the blankets are unrolled down slope, the matting must be on top with the wood fibers in contact with the soils. Butt snugly at the ends and sides before stapling.
- C. Using two (2) foot spacing between staples, excelsior matting shall be secured with four rows for each strip, with one row along each edge and alternating parallel rows down the center. The stapling over erosion stops, entrance and discharge ends of matting and butted end joints shall be the same as described for jute matting.

5.10

Construction Completed after Acceptable Seeding Dates

When construction is completed between October 15 and March 1 prepare the seedbed, fertilize and mulch as specified. Apply seed for permanent seed sometime between December 1 and March 1 increasing the seeding rates shown in Table 1 by 50 percent.

6.0

Protection

Planted areas shall be protected from damage and erosion. The Supplier shall provide and erect temporary barriers and signs as necessary to prevent vehicles, equipment and foot traffic from damaging seeded areas.

7.0

Maintenance

The Supplier shall perform the following maintenance tasks:

- A. Keep seedbed continually moist with light, frequent sprinklings several times a day to prevent seedlings from drying out.
- B. Inspect periodically after planting to see that vegetative stands are adequately established. Immediately reseed areas which show bare spots larger than 2 feet by 2 feet after germination.
- C. Check for erosion damage after storm events and repair damage. Reseed and mulch, if necessary.
- D. Fertilize newly permanent seeded areas one year after seeding with 300 pounds per acre of a complete (N-P-K) 10-10-10 or equivalent turf type slow release fertilizer.
- Application rate per acre shall be:
Nitrogen (N) - 120 pounds of actual nitrogen.

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Phosphorus (P) - 120 pounds of P_2O_5 .
Potassium (K) - 120 pounds of K_2O .



Appendix E: Hennepin Power Station; West Ash Disposal Pond Maintenance Plan (2013)

DYNEGY MIDWEST GENERATION, LLC

Hennepin Power Station

Hennepin, Illinois

Putnam County

West Ash Disposal Pond

IDNR Permit No. (not permitted)

Dam ID No. (not permitted)

Maintenance Plan

September 2013

TABLE OF CONTENTS

<u>Paragraph</u>	<u>Description</u>	<u>Page</u>
1.0	GENERAL	1
2.0	EMERGENCY OPERATIONS	1
2.1	Unusual Conditions	1
2.2	Dewatering	2
3.0	MAINTENANCE	2
3.1	Vegetation	2
3.2	Discharge Structure	2
3.3	Animal Damage and Repairs	2
3.4	Restriction of Unauthorized Vehicles	2
3.5	Inspections/Remedial Measures	3
3.5.1	Weekly Inspections	3
3.5.2	Quarterly Inspections	3
3.5.3	Five-year Inspections	
4.0	INSPECTION CHECKLISTS	3

1.0 GENERAL

The following operations and maintenance procedures are provided to maintain the structural integrity of the west ash storage surface impoundment at the Hennepin Power Station, which is unclassified and unpermitted, by the Illinois Department of Natural Resources, Office of Water Resources.

2.0 EMERGENCY OPERATIONS

2.1 Unusual Conditions

Any unusual condition discovered during major storm events or routine inspection, which may constitute an emergency, shall be handled as follows. Notice of any type of emergency involving the dikes or outfall shall be made to the Shift Leader on duty [(815) 339-9211]. The Shift Leader on duty shall notify the Station Manager, Ted Lindenbusch [home: (815) 875-2381], or, in his absence, the Environmental Coordinator, John P. Augspols [home: (815) 925-7488]. One of the above designated personnel shall notify the following city, county, state and federal regulatory authorities of the emergency condition.

- Division of Water Resources, Dam Safety Section, Dam Safety Engineers (217) 782-3862
- Illinois Emergency Management Agency, 24-hour service 1-(800) 782-7860
- Putnam County Sheriff/Hennepin Police Department (815) 925-7015
- Senior Director – Environmental Compliance, Dynegy Operating Company (618) 206-5912

2.2 Dewatering

The Station Manager or the Environmental Coordinator shall have the responsibility of determining how repairs shall be accomplished and whether dewatering of the disposal facility is necessary. Emergency dewatering shall be accomplished by portable pumps.

3.0 MAINTENANCE

3.1 Vegetation

Dikes shall be maintained to protect the structural integrity of the disposal facility. Damaged and barren areas shall be repaired as soon as appropriate after being discovered. Damaged areas shall be filled with topsoil. Limed, fertilized, and seeded with appropriate vegetation. Trees and shrubs observed during semiannual inspections shall be cut and removed from the dikes and discharge channel. This shall be done as frequently as is necessary to insure that no tree reaches a size where the root structure would require removal and filling. Woody vegetation, shrubs, and trees shall be removed during the early stages of growth before reaching a three-inch diameter.

Low growing vegetation, a prairie grass mixture that grows to a height of no more than six inches, shall be planted and maintained to facilitate inspections.

3.2 Discharge Structure

The discharge structure shall be inspected periodically for significant corrosion and deterioration. Any defects discovered shall be promptly repaired.

3.3 Animal Damage and Repairs

Animal burrows discovered during inspections shall be promptly repaired by filling with grout.

3.4 Restriction of Unauthorized Vehicles

Facility approaches shall be posted with signs restricting unauthorized travel on the roadways and slopes.

3.5 Inspections/Remedial Measures

3.5.1 Weekly Inspections

Weekly inspections of the perimeter berms shall be conducted, looking for seepage and slumping, and unusual seepage at and/or blockage of the outfall structures in each cell. All findings shall be entered into the weekly inspection checklist, discussed in Section 4.0. Maintenance activities shall be initiated, if required. Refer to Section 4.0 for the recommended inspection checklist to be used for the weekly inspections.

3.5.2 Quarterly Inspections

Inspections shall be made quarterly by Station personnel to determine the general condition of the dam and embankments. During these inspections, embankment erosion, tree growth, and embankment seepage shall be monitored. Seepage shall be observed for change in quantity and coloration. Refer to Section 4.0, for the recommended inspection checklist to be used for documenting the quarterly inspections.

3.5.3 Annual Inspections

An annual inspection shall be made by a licensed professional engineer. This inspection shall follow the Illinois Department of Natural Resources (IDNR) *Guidelines and Forms for Inspection of Illinois Dams*, and shall be followed by verbal and written reports by the consulting engineer. Based on the findings of the inspection, the Station Manager shall implement corrective action as required to promote dam safety. Procedures and methods for corrective action shall be performed in accordance with recommendations of the consulting engineer and as outlined above. Because the dam is not permitted by the IDNR, copies of the engineer's report, along with corrective action taken, will not be reported to the IDNR.

4.0 INSPECTION CHECKLISTS

The following Inspection checklists should be used during the weekly and quarterly inspections.

WEEKLY DAM INSPECTION FORM

Dam Location: Hennepin Power Station – West Ash Pond

Owner: Dynegy Midwest Generation, LLC, Havana Power Station

Permit No.: Not permitted

Class of Dam: Not classified

Type of Dam: Homogeneous earth dam

Type of Spillway: Drop structure

Date Inspected: _____

Weather Conditions: _____

Pool Elevation: _____

Inspection Personnel:

Name / Title

Signature

Inspection Item	Conditions	Location of Problem and Recommended Remedial Measures and Implementation Schedule
Vertical and Horizontal Alignment of Crest		
Unusual Movement or Cracking at or Beyond Toe		
Seepage		
Vegetative Cover		
Embankment Erosion		
Structural Cracking		
Outfall Structures		
Other		

QUARTERLY DAM INSPECTION FORM

Dam Location: Hennepin Power Station – West Ash Pond

Owner: Dynegy Midwest Generation, LLC, Hennepin Power Station

Permit No.: Not permitted

Class of Dam: Not classified

Type of Dam: Homogeneous earth dam

Type of Spillway: Drop structure

Date Inspected: _____

Weather Conditions: _____

Pool Elevation: _____

Inspection Personnel:

Signature

Name / Title	Signature	
Inspection Item	Conditions	Location of Problem and Recommended Remedial Measures and Implementation Schedule
Vertical and Horizontal Alignment of Crest	Good condition, with no significant issues	
Downstream Fill Slopes	Good condition, with no significant issues	
Upstream Fill Slopes	Good condition, with no significant issues	
Unusual Movement or Cracking at or Beyond Toe	Good condition, with no significant issues	
Seepage (Condition/Color)	Good condition, with no significant issues	
Vegetative Cover (Tree growth)	Good condition, with no significant issues	
Animal Damage	Good condition, with no significant issues	
Embankment Erosion	Good condition, with no significant issues	
Water Passages	Good condition, with no significant issues	
Structural Cracking	Good condition, with no significant issues	
Outfall Structures	Good condition	
Other		



Appendix F: Hennepin Power Station; Old East Ash Disposal Pond Maintenance Plan (2013)

DYNEGY MIDWEST GENERATION, LLC

Hennepin Power Station

Hennepin, Illinois

Putnam County

Old East Ash Disposal Pond

IDNR Permit No. (not permitted)

Dam ID No. (not permitted)

Maintenance Plan

September 2013

TABLE OF CONTENTS

<u>Paragraph</u>	<u>Description</u>	<u>Page</u>
1.0	GENERAL	1
2.0	EMERGENCY OPERATIONS	1
2.1	Unusual Conditions	1
2.2	Dewatering	2
3.0	MAINTENANCE	2
3.1	Vegetation	2
3.2	Discharge Structure	2
3.3	Animal Damage and Repairs	2
3.4	Restriction of Unauthorized Vehicles	2
3.5	Inspections/Remedial Measures	3
3.5.1	Weekly Inspections	3
3.5.2	Quarterly Inspections	3
3.5.3	Five-year Inspections	
4.0	INSPECTION CHECKLISTS	3

1.0 GENERAL

The following operations and maintenance procedures are provided to maintain the structural integrity of the old east ash storage surface impoundment at the Hennepin Power Station, which is unclassified and unpermitted, by the Illinois Department of Natural Resources, Office of Water Resources.

This is primarily the @ 0.5 mile significant berm system that extends along the Illinois River. The old east ash pond system consists of the inactive cells # 2 and # 4. As a result of the May 2011 USEPA dam assessment, a dam safety permit was submitted to IDNR in May 2013, to address major modifications to this significant berm. These major modifications include extensive tree removal and resloping. Resloping is required to improve slope stability and allow safe access to slope, for long-term mowing and maintenance.

2.0 EMERGENCY OPERATIONS

2.1 Unusual Conditions

Any unusual condition discovered during major storm events or routine inspection, which may constitute an emergency, shall be handled as follows. Notice of any type of emergency involving the dikes or outfall shall be made to the Shift Leader on duty [(815) 339-9211]. The Shift Leader on duty shall notify the Station Manager, Ted Lindenbusch [home: (815) 875-2381], or, in his absence, the Environmental Coordinator, John P. Augspols [home: (815) 925-7488]. One of the above designated personnel shall notify the following city, county, state and federal regulatory authorities of the emergency condition.

- Division of Water Resources, Dam Safety Section, Dam Safety Engineers (217) 782-3862
- Illinois Emergency Management Agency, 24-hour service 1-(800) 782-7860
- Putnam County Sheriff/Hennepin Police Department (815) 925-7015
- Senior Director – Environmental Compliance, Dynegy Operating Company (618) 206-5912

2.2 Dewatering

Not applicable.

3.0 MAINTENANCE

3.1 Vegetation

Dikes shall be maintained to protect the structural integrity of the disposal facility. Damaged and barren areas shall be repaired as soon as appropriate after being discovered. Damaged areas shall be filled with topsoil. Limed, fertilized, and seeded with appropriate vegetation. Trees and shrubs observed during semiannual inspections shall be cut and removed from the dikes and discharge channel. This shall be done as frequently as is necessary to insure that no tree reaches a size where the root structure would require removal and filling. Woody vegetation, shrubs, and trees shall be removed during the early stages of growth before reaching a three-inch diameter.

Low growing vegetation, a prairie grass mixture that grows to a height of no more than six inches, shall be planted and maintained to facilitate inspections.

3.2 Discharge Structure

Not applicable.

3.3 Animal Damage and Repairs

Animal burrows discovered during inspections shall be promptly repaired by filling with grout.

3.4 Restriction of Unauthorized Vehicles

Facility approaches shall be posted with signs restricting unauthorized travel on the roadways and slopes.

3.5 Inspections/Remedial Measures

3.5.1 Weekly Inspections

Weekly inspections of the perimeter berms shall be conducted, looking for seepage and slumping. All findings shall be entered into the weekly inspection checklist, discussed in Section 4.0. Maintenance activities shall be initiated, if required. Refer to Section 4.0 for the recommended inspection checklist to be used for the weekly inspections.

3.5.2 Quarterly Inspections

Inspections shall be made quarterly by Station personnel to determine the general condition of the dam and embankments. During these inspections, embankment erosion, tree growth, and embankment seepage shall be monitored. Seepage shall be observed for change in quantity and coloration. Refer to Section 4.0, for the recommended inspection checklist to be used for documenting the quarterly inspections.

3.5.3 Annual Inspections

An annual inspection shall be made by a licensed professional engineer. This inspection shall follow the Illinois Department of Natural Resources (IDNR) *Guidelines and Forms for Inspection of Illinois Dams*, and shall be followed by verbal and written reports by the consulting engineer. Based on the findings of the inspection, the Station Manager shall implement corrective action as required to promote dam safety. Procedures and methods for corrective action shall be performed in accordance with recommendations of the consulting engineer and as outlined above. Because the dam is not permitted by the IDNR, copies of the engineer's report, along with corrective action taken, will not be reported to the IDNR.

4.0 INSPECTION CHECKLISTS

The following Inspection checklists should be used during the weekly and quarterly inspections.

WEEKLY DAM INSPECTION FORM

Dam Location: Hennepin Power Station – Old East Ash Pond

Owner: Dynegy Midwest Generation, LLC, Havana Power Station

Permit No.: Not permitted

Class of Dam: Not classified

Type of Dam: Homogeneous earth dam

Type of Spillway: N/A

Date Inspected: _____

Weather Conditions: _____

Pool Elevation: _____

Inspection Personnel:

Name / Title

Signature

Inspection Item	Conditions	Location of Problem and Recommended Remedial Measures and Implementation Schedule
Vertical and Horizontal Alignment of Crest		
Unusual Movement or Cracking at or Beyond Toe		
Seepage		
Vegetative Cover		
Embankment Erosion		
Structural Cracking		
Outfall Structures		
Other		

QUARTERLY DAM INSPECTION FORM

Dam Location: Hennepin Power Station – Old East Ash Pond

Owner: Dynegy Midwest Generation, LLC, Hennepin Power Station

Permit No.: Not permitted

Class of Dam: Not classified

Type of Dam: Homogeneous earth dam

Type of Spillway: Not applicable

Date Inspected: _____

Weather Conditions: _____

Pool Elevation: _____

Inspection Personnel:

Signature

Name / Title	Signature	
Inspection Item	Conditions	Location of Problem and Recommended Remedial Measures and Implementation Schedule
Vertical and Horizontal Alignment of Crest	Good condition, with no significant issues	
Downstream Fill Slopes	Good condition, with no significant issues	
Upstream Fill Slopes	Good condition, with no significant issues	
Unusual Movement or Cracking at or Beyond Toe	Good condition, with no significant issues	
Seepage (Condition/Color)	Good condition, with no significant issues	
Vegetative Cover (Tree growth)	Good condition, with no significant issues	
Animal Damage	Good condition, with no significant issues	
Embankment Erosion	Good condition, with no significant issues	
Water Passages	Good condition, with no significant issues	
Structural Cracking	Good condition, with no significant issues	
Outfall Structures	Good condition	
Other		



Appendix G: Hennepin Power Station; East Ash Disposal Pond Maintenance Plan (2014)

DYNEGY MIDWEST GENERATION, LLC

Hennepin Power Station

Hennepin, Illinois

Putnam County

East Ash Disposal Pond

Small Class III Dam

IDNR Permit No. DS2011079

Dam ID No. IL50363

Maintenance Plan

Revised – August 2014

TABLE OF CONTENTS

<u>Paragraph</u>	<u>Description</u>	<u>Page</u>
1.0	GENERAL	1
2.0	EMERGENCY OPERATIONS	1
2.1	Unusual Conditions	1
2.2	Dewatering	2
3.0	MAINTENANCE	2
3.1	Vegetation	2
3.2	Discharge Structure	2
3.3	Animal Damage and Repairs	2
3.4	Restriction of Unauthorized Vehicles	2
3.5	Inspections/Remedial Measures	3
3.5.1	Weekly Inspections	3
3.5.2	Quarterly Inspections	3
3.5.3	Five-year Inspections	
3.6	Annual Statement	3
4.0	INSPECTION CHECKLISTS	3

1.0 GENERAL

The following operations and maintenance procedures are provided to maintain the structural integrity of the east ash storage surface impoundment at the Hennepin Power Station, which is classified as a small Class III dam by the Illinois Department of Natural Resources, Office of Water Resources. The primary pond's maximum normal pool elevation will be 489.5 msl with a dam crest at elevation 494.0 msl. The secondary pond's maximum normal pool elevation will be 480.5 with a dam crest at 494.0 msl.

2.0 EMERGENCY OPERATIONS

2.1 Unusual Conditions

Any unusual condition discovered during major storm events or routine inspection, which may constitute an emergency, shall be handled as follows. Notice of any type of emergency involving the dikes or outfall shall be made to the Shift Leader on duty [(815) 339-9211]. The Shift Leader on duty shall notify the Managing Director, Byron Veech [cell: (309) 543-8714], or, in his absence, the Environmental Coordinator, John P. Augspols [home: (815) 925-7488]. One of the above designated personnel shall notify the following city, county, state and federal regulatory authorities of the emergency condition.

- Division of Water Resources, Dam Safety Section, Dam Safety Engineers (217) 782-3862
- Illinois Emergency Management Agency, 24-hour service 1-(800) 782-7860
- Putnam County Sheriff/Hennepin Police Department (815) 925-7015
- Senior Director – Environmental Compliance, Dynegy Operating Company (618) 343-7761

2.2 Dewatering

The Station Manager or the Environmental Coordinator shall have the responsibility of determining how repairs shall be accomplished and whether dewatering of the disposal facility is necessary. Dewatering shall be accomplished by manually removing the concrete beams from the primary and/or secondary pond structures until the desired water level is reached.

3.0 MAINTENANCE

3.1 Vegetation

Dikes shall be maintained to protect the structural integrity of the disposal facility. Damaged and barren areas shall be repaired as soon as appropriate after being discovered. Damaged areas shall be filled with topsoil. Limed, fertilized, and seeded with appropriate vegetation. Trees and shrubs observed during periodic inspections shall be cut and removed from the dikes and discharge channel. This shall be done as frequently as is necessary to insure that no tree reaches a size where the root structure would require removal and filling. Woody vegetation, shrubs, and trees shall be removed during the early stages of growth before reaching a three-inch diameter.

Low growing vegetation shall be planted and maintained to facilitate inspections.

3.2 Discharge Structure

The discharge structure shall be inspected periodically for significant corrosion, spalling, and cracking. Any defects discovered shall be promptly repaired.

3.3 Animal Damage and Repairs

Animal burrows discovered during inspections shall be promptly repaired by filling with grout.

3.4 Restriction of Unauthorized Vehicles

Facility approaches shall be posted with signs restricting unauthorized travel on the roadways and slopes.

3.5 Inspections/Remedial Measures

3.5.1 Weekly Inspections

Weekly inspections of the perimeter berms shall be conducted, looking for seepage and slumping, and unusual seepage at and/or blockage of the outfall structures in each cell. All findings shall be entered into the weekly inspection checklist, discussed in Section 4.0. Maintenance activities shall be initiated, if required. Refer to Section 4.0 for the recommended inspection checklist to be used for the weekly inspections.

3.5.2 Quarterly Inspections

Inspections shall be made quarterly by Station personnel to determine the general condition of the dam and embankments. During these inspections, embankment erosion, tree growth, and embankment seepage shall be monitored. Seepage shall be observed for change in quantity and coloration. Refer to Section 4.0, for the recommended inspection checklist to be used for documenting the quarterly inspections.

3.5.3 Five-Year Inspections

Every five years, an inspection shall be made by a licensed professional engineer. This inspection shall follow the Illinois Department of natural Resources (IDNR) *Guidelines and Forms for Inspection of Illinois Dams*, and shall be followed by verbal and written reports by the consulting engineer. Based on the findings of the inspection, the Station Manager shall implement corrective action as required to promote dam safety. Procedures and methods for corrective action shall be performed in accordance with recommendations of the consulting engineer and as outlined above. Copies of the engineer's report, along with corrective action taken, shall be reported to the IDNR.

3.6 Annual Statement

An annual statement on forms furnished by IDNR, certifying compliance with this maintenance plan, shall be submitted to IDNR.

4.0 **INSPECTION CHECKLISTS**

The following Inspection checklists should be used during the weekly and quarterly inspections.

WEEKLY DAM INSPECTION FORM

Dam Location: Hennepin Power Station – East Ash Pond

Owner: Dynegy Midwest Generation, LLC, Havana Power Station

Permit No.: DS2011079

Class of Dam: III

Type of Dam: Homogeneous earth dam, with clay and geosynthetic / clay liner

Type of Spillway: Drop structure and stop logs

Date Inspected: _____

Weather Conditions: _____

Pool Elevation: _____

Inspection Personnel:

Name / Title

Signature

Inspection Item	Conditions	Location of Problem and Recommended Remedial Measures and Implementation Schedule
Vertical and Horizontal Alignment of Crest		
Unusual Movement or Cracking at or Beyond Toe		
Seepage		
Vegetative Cover		
Embankment Erosion		
Structural Cracking		
Outfall Structures		
Other		

QUARTERLY DAM INSPECTION FORM

Dam Location: Hennepin Power Station – East Ash Pond

Owner: Dynegy Midwest Generation, LLC, Hennepin Power Station

Permit No.: DS2011079

Class of Dam: III

Type of Dam: Homogeneous earth dam, with clay and geosynthetic / clay liner

Type of Spillway: Drop structure and stop logs

Date Inspected: _____

Weather Conditions: _____

Pool Elevation: _____

Inspection Personnel:

Signature

Name / Title	Signature	Location of Problem and Recommended Remedial Measures and Implementation Schedule
Inspection Item	Conditions	Location of Problem and Recommended Remedial Measures and Implementation Schedule
Vertical and Horizontal Alignment of Crest	Good condition, with no significant issues	
Downstream Fill Slopes	Good condition, with no significant issues	
Upstream Fill Slopes	Good condition, with no significant issues	
Unusual Movement or Cracking at or Beyond Toe	Good condition, with no significant issues	
Seepage (Condition/Color)	Good condition, with no significant issues	
Vegetative Cover (Tree growth)	Good condition, with no significant issues	
Animal Damage	Good condition, with no significant issues	
Embankment Erosion	Good condition, with no significant issues	
Water Passages	Good condition, with no significant issues	
Structural Cracking	Good condition, with no significant issues	
Outfall Structures	Good condition	
Other		

ATTACHMENT C

Hennepin Power Plant East Ash Pond's Chemical Constituents

In accordance with 35 I.A.C. 845.230(d)(2)(C), DMG is submitting available/existing analyses of “the chemical constituents of all waste streams, chemical additives and sorbent materials entering or contained in” the CCR impoundment, East Ash Pond.

A list of the chemical constituents' analyses contained in the CCR surface impoundment can be found in Appendix A. As determined through antidegradation studies, this list contains chemical constituents found in the surface free liquid and the subsurface free liquids. DMG is also including a list of chemical additives, sorbent materials and waste streams that were submitted in the facility's NPDES permit applications to IEPA within the past ten years at a minimum and/or listed in the current NPDES permit (IL0001554) in Appendix B.

Appendix A: Chemical Constituents Contained in the East Ash Pond

Pollutant	Units	Surface Free Liquids Average Concentration	Subsurface Free Liquids Average Concentration
Ammonia	mg/L	0.200	1.495
Arsenic	mg/L	0.002	0.002
Arsenic, Dissolved	mg/L	0.002	0.002
Barium	mg/L	0.145	0.540
Boron	mg/L	0.675	2.275
Cadmium	mg/L	0.001	0.000
Cadmium, Dissolved	mg/L	0.001	0.000
Chloride	mg/L	95.500	76.000
Chromium	mg/L	0.005	0.037
Chromium (hexavalent)	mg/L	0.006	0.036
Chromium, Dissolved	mg/L	0.005	0.040
Chromium, Hexavalent, Dissolved	mg/L	0.005	0.038
Chromium, Trivalent, Dissolved	mg/L	0.010	0.010
Copper	mg/L	0.004	0.003
Copper, Dissolved	mg/L	0.003	0.002
Cyanide	mg/L	0.004	0.005
Fluoride	mg/L	0.180	0.890
Fluoride, Dissolved	mg/L	0.185	0.903
Iron	mg/L	0.097	0.234
Iron, Dissolved	mg/L	0.065	0.078
Lead	mg/L	0.000	0.000
Lead, Dissolved	mg/L	0.000	0.000
Magnesium	mg/L	29.500	0.280
Manganese	mg/L	0.020	0.002
Mercury	mg/L	0.000	0.000
Mercury, Dissolved Total	mg/L	0.000	0.000
Nickel	mg/L	0.007	0.003
Nickel, Dissolved	mg/L	0.007	0.003
Nitrate - Nitrite	mg/L	4.050	1.880
Nitrogen, Kjeldahl	mg/L	0.950	1.378
Nitrogen, Total	mg/L	5.000	3.250
Oil and Grease	mg/L	4.800	4.800
pH	SU	8.985	12.110
Phenols	mg/L	0.005	0.005
Selenium	mg/L	0.004	0.056
Silver	mg/L	0.001	0.001
Sulfate	mg/L	122.500	195.000
TDS	mg/L	510.000	917.500
TSS	mg/L	15.500	6.875
Zinc	mg/L	0.007	0.020
Zinc, Dissolved	mg/L	0.012	0.020

Appendix B: List of Chemical Additives, Waste Streams and Sorbent Materials

Chemical Additives
Caustic (sodium hydroxide)
Sulfur Pellets
KLARAID IC1173
SPECTRUS NX1106
Active Carbon
Calcium Bromide
Carbon Dioxide
Cement Kiln Dust
Copper Sulfate
Nalco 8187
Fluorescent Dye
Barley Straw
Nalco Dust Foam Plus

Waste Streams and Sorbent Materials
Units 1&2 Bottom and Fly Ash
Units 1&2 Ash Hopper Overflows
Bldg. Floor Drains & Sump Discharges
Reverse Osmosis Unit Concentrate and Reject Wastewater
U1&2 Nonchemical Metal Cleaning
U1&2 Fly Ash Air Separator Overflows
U1&2 Ash Hopper Tank Overflows
U1&2 Boiler Drum Tank Drainage
U1&2 Ash Line Low Pt. Drainage
Coal Breaker Building Drain Sump
Crib House Sump
Crib House Station Sump
Deep Well Acid Cleaning Rinse water
Coal Pile Runoff
Illinois River Dredge Spoils
Mercury Sorbent Residues
Boiler Chemical Cleaning Waste
Fly ash grit blasting material
Units 1 and 2 Non-Chemical Metal Cleaning Wash water
Power Block Building Floor Drains and Sump Discharges
Boiler Drum Chemical Tank Drainage
Bag House Diatomaceous Earth Solids
Landfill Leachate and Stormwater
Stormwater Runoff
Truck Wash Water and Pug Mill Mixer Wash Water
Coal-Pile Runoff and Mechanical and Wet Dredge Spoils

Safety Data Sheet

Section 1
Identification of the Substance and of the Supplier

1.1 Product Identifier

Product Name/Identification:	ASTM Class C Fly Ash
Synonyms:	Coal Fly Ash, Pozzolan
Formula:	UVCB Substance

1.2 Relevant Identified Uses of the Substance or Mixture and Uses Advices Against

Relevant Identified Uses:	Component of wallboard, concrete, roofing material, bricks, cement kiln feed.
Uses Advised Against:	None known.

1.3 Details of the Supplier of the SDS

Manufacturer/Supplier:	Dynegy, Inc.
Street Address:	601 Travis Street, Suite 1400
City, State and Zip Code:	Houston, TX 77002
Customer Service Telephone:	800-633-4704


Section 2
Hazards Identification

2.1 Classification of the Substance

GHS Classification(s) according to OSHA Hazard Communication Standard (29 CFR 1910.1200):

- Eye Irritant, Category 2A
- STOT-SE, Category 3 (Respiratory Irritation)
- Carcinogen, Category 1A
- STOT-RE, Category 1 (Lungs)
- Toxic to Reproduction, Category 2

2.2 Label Elements

Labelling according to 29 CFR 1910.1200 Appendices A, B and C*	
Hazard Pictogram(s):	
Signal word:	DANGER
Hazard Statement(s):	<p><i>Causes serious eye irritation.</i></p> <p><i>May cause damage to lungs after repeated/prolonged exposure via inhalation.</i></p> <p><i>May cause respiratory irritation.</i></p> <p><i>May cause cancer of the lung.</i></p> <p><i>Suspected of damaging fertility or the unborn child.</i></p>
Precautionary Statement(s):	<p><i>Obtain special instructions before use.</i></p> <p><i>Do not handle until all safety precautions have been read and understood.</i></p> <p><i>Avoid breathing dust.</i></p> <p><i>Wear protective gloves/protective clothing/eye protection/face protection.</i></p> <p><i>Wash thoroughly after handling.</i></p> <p><i>Do not eat drink or smoke when using this product.</i></p> <p><i>Use outdoors or in a well-ventilated area.</i></p> <p><i>If exposed or concerned: Get medical advice/attention.</i></p> <p><i>Store in a secure area.</i></p> <p><i>Dispose of product in accordance with local/national regulations.</i></p>

** Fly ash and other coal combustion products (CCPs) are UVCB substances (unknown or variable composition or biological). Various CCPs, noted as ashes/ash residuals; Ashes, residues, bottom; Bottom ash; Bottom ash residues; Waste solids, ashes under TSCA are defined as: "The residuum from the burning of a combination of carbonaceous materials. The following elements may be present as oxides: aluminum, calcium, iron, magnesium, nickel, phosphorus, potassium, silicon, sulfur, titanium, and vanadium." Ashes including fly ash and fluidized bed combustion ash are identified by CAS number 68131-74-8. The exact composition of the ash is dependent on the fuel source and flue additives composed of many constituents. The*

classification of the final substance is dependent on the presence of specific identified oxides as well as other trace elements.

2.3 Other Hazards

Listed Carcinogens:

-Respirable Crystalline Silica

IARC: [Yes] **NTP:** [Yes] **OSHA:** [Yes] **Other: (ACGIH)** [Yes]

Section 3 Composition/Information on Ingredients

<i>Substance</i>	<i>CAS No.</i>	<i>Percentage (%)</i>	<i>GHS Classification</i>
<i>Crystalline Silica</i>	14808-60-7	30 - 60%	<i>Repeat Dose STOT, Category 1 Carcinogen, Category 1A</i>
<i>Silica, crystalline respirable (RCS)</i>	14808-60-7	See Footnote 1	<i>Repeat Dose STOT, Category 1 Carcinogen, Category 1A</i>
<i>Aluminosilicates</i>	71243-67-9 1327-36-2	30 - 60%	<i>Single Exposure STOT, Category 3</i>
<i>Iron oxide</i>	1309-37-1	1 - 10%	<i>Not Classified</i>
<i>Calcium oxide (CaO)</i>	1305-78-8	20 - 30%	<i>Skin Irritant, Category 2 Eye Irritant, Category 1 Single Exposure STOT, Category 3</i>
<i>Magnesium oxide</i>	1309-48-4	2 - 10%	<i>Not Classified</i>
<i>Phosphorus pentoxide (P₂O₅)</i>	1314-56-3	≤2%	<i>Skin Irritant, Category 2 Eye Irritant, Category 2B</i>
<i>Sodium oxide</i>	1313-59-3	1-8%	<i>Not Classified</i>
<i>Potassium oxide (K₂O)</i>	12136-45-7	≤1%	<i>Skin Irritant, Category 2 Eye Irritant, Category 2B</i>
<i>Titanium dioxide (TiO₂)</i>	13463-67-7	<3%	<i>Not Classified</i>
<i>Bromide salt (calcium)</i>	7789-41-5	<i>See Footnote 2</i>	<i>Toxic to Reproduction, Category 2</i>

Footnote 1: The percentage of respirable crystalline silica has not been determined. Therefore, a GHS classification of Carcinogen, Category 1A has been assigned.

Footnote 2: Analytical data are not available to demonstrate that the concentration of bromide salt is <0.1%; therefore, a GHS classification of Toxic to Reproduction, Category 2 has been assigned.

Section 4
First Aid Measures

4.1 Description of First Aid Measures

Inhalation:	If product is inhaled and irritation of the nose or coughing occurs, remove person to fresh air. Get medical advice/attention if respiratory symptoms persist.
Skin Contact:	If skin exposure occurs, wash with soap and water.
Eye Contact:	If product gets into the eye, rinse copiously with water for several minutes. Remove contact lenses, if present and easy to do. Seek medical attention/advice if irritation occurs or persists.
Ingestion:	No specific first aid measures are required.

4.2 Most Important Health Effects, Both Acute and Delayed

Acute Effects: Direct exposure may cause respiratory irritation, eye irritation and skin irritation. The product dust can dry and irritate the skin and cause dermatitis and can irritate eyes and skin through mechanical abrasion.

Chronic Effects: Chronic exposure may cause lung damage from repeated exposure. Prolonged inhalation of respirable crystalline silica above certain concentrations may cause lung diseases, including silicosis and lung cancer. Repeated exposure to dusts containing inorganic bromide salts may affect fertility and/or result in effects to the unborn child.

4.3 Indication of Any Immediate Medical Attention and Special Treatment Needed

Seek first aid or call a doctor or Poison Control Center if contact with eyes occurs and irritation remains after rinsing. Get medical advice if inhalation occurs and respiratory symptoms persist.

Section 5
Firefighting Measures

5.1 Extinguishing Media

Suitable Extinguishing Media:	Product is not flammable. Use extinguishing media appropriate for surrounding fire.
Unsuitable Extinguishing Media:	Not applicable, the product is not flammable.

5.2 Special Hazards Arising from the Substance or Mixture

Hazardous Combustion Products:	None known.
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5.3 Advice for Firefighters

Special Protective Equipment and Precautions for Firefighters:	As with any fire, wear self-contained breathing apparatus (NIOSH approved or equivalent) and full protective gear.
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Section 6
Accidental Release Measures

6.1 Personal Precautions, Protective Equipment and Emergency Procedures

Personal precautions/Protective Equipment:	See Section 8.2.2 Individual Protective Measures. For concentrations exceeding Occupational Exposure Levels (OELs), use a self-contained breathing apparatus (SCBA).
Emergency procedures:	Use scooping, water spraying/flushing/misting or ventilated vacuum cleaning systems to clean up spills. Do not use pressurized air.

6.2 Environmental Precautions

Environmental precautions:	Prevent contamination of drains or waterways and dispose according to local and national regulations.
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6.3 Methods and Material for Containment and Cleaning Up

Methods and materials for containment and cleaning up:	<p>Do not use brooms or compressed air to clean surfaces. Use dust collection vacuum and extraction systems.</p> <p>Large spills of dry product should be removed by a vacuum system. Dampened material should be removed by mechanical means and recycled or disposed of according to local and national regulations.</p>
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See Sections 8 and 13 for additional information on exposure controls and disposal.

Section 7 Handling and Storage

7.1 Precautions for Safe Handling

Practice good housekeeping. Use adequate exhaust ventilation, dust collection and/or water mist to maintain airborne dust concentrations below permissible exposure limits (note: respirable crystalline silica dust may be in the air without a visible dust cloud).

Do not permit dust to collect on walls, floors, sills, ledges, machinery, or equipment. Maintain and test ventilation and dust collection equipment. In cases of insufficient ventilation, wear a NIOSH approved respirator for silica dust when handling or disposing dust from this product. Avoid contact with skin and eyes. Wash or vacuum clothing that has become dusty. Avoid eating, smoking, or drinking while handling the material.

7.2 Conditions for Safe Storage, Including any Incompatibilities

Minimize dust produced during loading and unloading.

Section 8 Exposure Controls/Personal Protection

8.1 Control Parameters

OCCUPATIONAL EXPOSURE LIMITS					
SUBSTANCE		OSHA PEL TWA (mg/m ³)	NIOSH REL TWA (mg/m ³)	ACGIH TLV TWA (mg/m ³)	CA - OSHA PEL (mg/m ³)
Calcium oxide		5	2	2	2
Particulates Not Otherwise Regulated	Total	15	15	10	10
	Respirable	5	5	3	5
Respirable Crystalline Silica	Respirable Crystalline Silica	0.05	0.05	0.025	0.05
Titanium dioxide	Total	15	2.4 (fine) 0.3 (ultrafine)	10	10
Manganese dioxide (as manganese compounds)	Total	5 (Ceiling)	1 3 (STEL)	0.1	0.2
	Respirable	-	-	0.02	-

8.2 Exposure Controls

8.2.1 Engineering Controls

Provide ventilation to maintain the ambient workplace atmosphere below the occupational exposure limit(s). Use general and local exhaust ventilation and dust collection systems as necessary to minimize exposure.

8.2.2 Personal Protective Equipment (PPE)

Respiratory protection:	Wear a NIOSH approved particulate respirator if exposure to airborne particulates is unavoidable and where occupational exposure limits may be exceeded. If airborne exposures are anticipated to exceed applicable PELs or TLVs, a self-contained breathing apparatus or airline respirator is recommended.
Eye and face protection:	If eye contact is possible, wear protective glasses with side shields. Avoid contact lenses.
Hand and skin protection:	Wear gloves and protective clothing. Wash hands with soap and water after contact with material.

Section 9
Physical and Chemical Properties

9.1 Information on Basic Physical and Chemical Properties

Property: Value	Property: Value
Appearance (physical state, color, etc.): Fine tan/gray particulate	Upper/lower flammability or explosive limits: Not applicable
Odor: Odorless ¹	Vapor Pressure (Pa): Not applicable
Odor threshold: Not applicable	Vapor Density: Not applicable
pH (25 °C) (in water): Not Determined	Specific gravity or relative density: 2.2 – 2.9
Melting point/freezing point (°C): Not applicable	Water Solubility: Slight
Initial boiling point/boiling range (°C): NA	Partition coefficient: n-octane/water: NA
Flash point (°C): Not determined	Auto ignition temperature (°C): Not applicable
Evaporation rate: Not applicable	Decomposition temperature (°C): Not determined
Flammability (solid, gas): Not combustible	Viscosity: Not applicable

¹ The use of urea or aqueous ammonia injected into the flue gas to reduce nitrogen oxides (NOx) emissions may result in the presence of ammonium sulfate or ammonium bisulfate in the ash at less than 0.1%. When ash containing these substances becomes wet under high pH (>9), free ammonia gas may be released resulting in objectionable/nuisance ammonia odor and potential exposure to ammonia gas especially in confined spaces.

Section 10
Stability and Reactivity

10.1 Reactivity:	The material is an inert, inorganic material primarily composed of elemental oxides.
10.2 Chemical stability:	The material is stable under normal use conditions.
10.3 Possibility of hazardous reactions:	The material is a relatively stable, inert material; however, when ash containing ammonia becomes wet under high pH (>9), free ammonia gas may be released resulting in an objectionable/nuisance ammonia odor and potential exposure to ammonia gas especially in confined spaces. Polymerization will not occur.
10.4 Conditions to avoid:	Product can become airborne in moderate winds. Dry material should be stored in silos. Materials stored out of doors should be covered or maintained in a damp condition.
10.5 Incompatible materials:	None known.
10. 6 Hazardous decomposition products:	None known.

Section 11
Toxicological Information

11.1 Information on Toxicological Effects

Endpoint	Data
Acute oral toxicity	LD50 > 2000 mg/kg
Acute dermal toxicity	LD50 > 2000 mg/kg
Acute inhalation toxicity	LD50 > 5.0 mg/L
Skin corrosion/irritation	Does not meet the classification criteria but may cause slight skin irritation. Product dust can dry the skin which can result in irritation.
Eye damage/irritation	Causes serious eye irritation. Positive scores for conjunctiva irritation and chemosis in 2/3 animals based on average of 24, 48 and 72-hour scores with irritation clearing within 21 days; No corneal or iritis effects observed.
Respiratory/skin sensitization	Not a respiratory or dermal sensitizer.
Germ cell mutagenicity	Not mutagenic in in-vitro and in-vivo assays with or without metabolic activation.
Carcinogenicity	Not available. Respirable crystalline silica has been identified as a carcinogen by OSHA, NTP, ACGIH and IARC.
Reproductive toxicity	<p>No developmental toxicity was observed in available animal studies. Reproductive studies on CCPs showed either no reproductive effects, or some effects on male and female reproductive organs and parameters but without a clear dose response.</p> <p>Inorganic bromide salts have been shown to have adverse effects on reproductive parameters in some animal studies.</p>
STOT-SE	CCPs when present as a nuisance dust may result in respiratory irritation.
STOT-RE	<p>In a 180-day inhalation study with fly ash dust, no effects were observed at the highest dose tested. NOEC = 4.2 mg/m³; it is not possible to assess the level at which toxicologically significant effects may occur.</p> <p>Repeated inhalation exposures to high levels of respirable crystalline silica may result in lung damage (i.e., silicosis).</p>
Aspiration Hazard	Not applicable based product form.

Section 12
Ecological Information

12.1 Toxicity

Fly Ash C (CAS# 68131-74-8)	
Toxicity to Fish	LC50 > 100 mg/L
Toxicity to Aquatic Invertebrates	Data indicates that the test substance is not toxic to <i>Daphnia magna</i> (EC50 undetermined).
Toxicity to Aquatic Algae and Plants	EC50 = 10 mg/L

Calcium oxide CAS# 1305-78-8	
Toxicity to Fish	LC50 = 50.6 mg/L The findings were closely related to the pH of the test solutions; therefore, pH is considered to be the main reason for the effects.
Toxicity to Aquatic Invertebrates	EC50 = 49.1 mg/L The findings were closely related to the pH of the test solutions; therefore, pH is considered to be the main reason for the effects.
Toxicity to Aquatic Algae and Plants	NOEC = 48 mg/L @ 72 hours based on Ca(OH) ₂ The initial pH of the test medium was not directly related to the biologically relevant effects. The formation of precipitates is likely the result of the reaction between CO ₂ dissolved in the medium.

12.2 Persistence and Degradability

Not relevant for inorganic materials.

12.3 Bioaccumulative Potential

This material does not contain any compounds that would bioaccumulate up the food chain.

12.4 Mobility in Soil

No data available.

12.5 Results of PBT and vPvB Assessment

This material does not contain any compounds classified as “persistent, bioaccumulative or toxic” nor as “very persistent/very bioaccumulative”.

12.6 Other Adverse Effects

None known.

Section 13

Disposal Considerations

See Sections 7 and 8 above for safe handling and use, including appropriate industrial hygiene practices.
 Dispose of all waste product and containers in accordance with federal, state and local regulations.

**Section 14
 Transport Information**

Regulatory entity: U.S. DOT	Shipping Name:	Not Regulated
	Hazard Class:	Not Regulated
	ID Number:	Not Regulated
	Packing Group:	Not Regulated

Section 15
Regulatory Information

15.1 Safety, Health and Environmental Regulations/Legislation Specific for the Mixture

- TSCA Inventory Status
 All components are listed on the TSCA Inventory.
- California Proposition 65.
 The following substances are known to the State of California to be carcinogens and/or reproductive toxicants:
 - Respirable crystalline silica
- State Right-to-Know (RTK)

Component	CAS	MA ^{1,2}	NJ ^{3,4}	PA ⁵	RI ⁶
Ammonium bisulfate	7803-63-6	No	Yes	No	No
Ammonium sulfate	7783-20-2	Yes	No	Yes	No
Calcium oxide	1305-78-8	Yes	Yes	Yes	No
Iron oxide	1309-37-1	Yes	Yes	Yes	No
Magnesium oxide	1309-48-4	No	Yes	No	No
Manganese oxide-as manganese compounds	1313-13-9; Various	No	No	Yes	Yes
Phosphorus pentoxide (or phosphorus oxide)	1314-56-3	Yes	Yes	Yes	No
Potassium oxide	12136-45-7	No	Yes	No	No
Silica-crystalline (SiO ₂), quartz	14808-60-7	Yes	Yes	Yes	No
Sodium oxide	1313-59-3	No	Yes	No	No
Titanium dioxide	13463-67-7	Yes	Yes	Yes	Yes

¹ Massachusetts Department of Public Health, no date
² 189th General Court of The Commonwealth of Massachusetts, no date
³ New Jersey Department of Health and Senior Services, 2010a
⁴ New Jersey Department of Health, 2010b
⁵ Pennsylvania Code, 1986
⁶ Rhode Island Department of Labor and Training, no date

Section 16
Other Information, Including Date of Preparation or Last Revision

16.1 Indication of Changes

Date of preparation or last revision: February 23, 2018

16.2 Abbreviations and Acronyms

- ACGIH: American Conference of Industrial Hygienists
- CA: California
- CAS: Chemical Abstract Services
- CCP: Coal Combustion Product
- CFR: Code of Federal Regulations
- EPA: Environmental Protection Agency

- GHS: Globally Harmonized System of Classification and Labelling
- IARC: International Agency for Research on Cancer
- LC50: Concentration resulting in the mortality of 50 % of an animal population
- LD50: Dose resulting in the mortality of 50 % of an animal population
- MA: Massachusetts
- NA: Not Applicable
- NJ: New Jersey
- NOEC: No observed effect concentration
- NIOSH: National Institute of Occupational Safety and Health
- NOx: Nitrogen oxides
- NTP: US National Toxicology Program
- OEL: Occupational Exposure Limit
- OSHA: Occupational Safety and Health Administration
- PA: Pennsylvania
- PBT: Persistent, Toxic and Bioaccumulative
- PEL: Permissible exposure limit
- PPE: Personal Protective Equipment
- REL: Recommended exposure limit
- RI: Rhode Island
- RCS: Respirable Crystalline Silica
- RTK: Right-to-Know
- SCBA: Self-contained breathing apparatus
- SDS: Safety Data Sheet
- STEL: Short-term exposure limit
- STOT-RE: Specific target organ toxicity-repeated exposure
- STOT-SE: Specific target organ toxicity-single exposure
- TLV: Threshold limit value
- TSCA: Toxic Substances Control Act
- TWA: Time-weighted average
- UEL: Upper explosive limit
- UVCB: Unknown or Variable Composition/Biological
- U.S.: United States
- U.S. DOT: United States of Department of Transportation

16.3 Other Hazards

Hazardous Materials Identification System (HMIS)						
Degree of hazard (0= low, 4 = extreme)						
Health:	2*	Flammability:	0	Physical Hazards:	0	Personal protection:**

* Chronic Health Effects

** Appropriate personal protection is defined by the activity to be performed.

See Section 8 for additional information.

DISCLAIMER:

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Safety Data Sheet

Section 1
Identification of the Substance and of the Supplier

1.1 Product Identifier

Product Name/Identification:	ASTM Bottom Ash
Synonyms:	Ash; Ashes; Ash residues; Ashes, residues, bottom; Bottom ash; Bottom ash residues; Coal Fly Ash; Pozzolan; Waste solids.
Formula:	UVCB Substance

1.2 Relevant Identified Uses of the Substance or Mixture and Uses Advices Against

Relevant Identified Uses:	Component of wallboard, concrete, roofing material, bricks, cement kiln feed.
Uses Advised Against:	None known.

1.3 Details of the Supplier of the SDS

Manufacturer/Supplier:	Dynegy, Inc.
Street Address:	601 Travis Street, Suite 1400
City, State and Zip Code:	Houston, TX 77002
Customer Service Telephone:	800-633-4704


Section 2
Hazards Identification

2.1 Classification of the Substance

GHS Classification(s) according to OSHA Hazard Communication Standard (29 CFR 1910.1200):

- Eye Irritant, Category 2A
- STOT-SE, Category 3 (Respiratory Irritation)
- Carcinogen, Category 1A
- STOT-RE, Category 1 (Lungs)
- Toxic to Reproduction, Category 2

2.2 Label Elements

<i>Labelling according to 29 CFR 1910.1200 Appendices A, B and C*</i>	
Hazard Pictogram(s):	
Signal word:	DANGER
Hazard Statement(s):	<p><i>Causes serious eye irritation.</i></p> <p><i>May cause respiratory irritation.</i></p> <p><i>May cause damage to lungs after repeated/prolonged exposure via inhalation.</i></p> <p><i>May cause cancer of the lung.</i></p> <p><i>Suspected of damaging fertility or the unborn child.</i></p>
Precautionary Statement(s):	<p><i>Obtain special instructions before use.</i></p> <p><i>Do not handle until all safety precautions have been read and understood.</i></p> <p><i>Avoid breathing dust.</i></p> <p><i>Wash thoroughly after handling.</i></p> <p><i>Do not eat drink or smoke when using this product.</i></p> <p><i>Wear protective gloves/protective clothing/eye protection/face protection.</i></p> <p><i>Use outdoors or in a well-ventilated area.</i></p> <p><i>If exposed or concerned: Get medical advice/attention.</i></p> <p><i>Store in a secure area.</i></p> <p><i>Dispose of product in accordance with local/national regulations.</i></p>

** Fly ash and other coal combustion products (CCPs) are UVCB substances (unknown or variable composition or biological). Various CCPs, noted as ashes/ash residuals; Ashes, residues, bottom; Bottom ash; Bottom ash residues; Waste solids, ashes under TSCA are defined as: "The residuum from the burning of a combination of carbonaceous materials. The following elements may be present as oxides: aluminum, calcium, iron, magnesium, nickel, phosphorus, potassium, silicon, sulfur, titanium, and vanadium." Ashes including fly ash and fluidized bed combustion ash are identified by CAS number 68131-74-8. The exact composition of the ash is dependent on the fuel source and flue additives composed of many constituents. The classification of the final substance is dependent on the presence of specific identified oxides as well as other trace elements.*

2.3 Other Hazards

Listed Carcinogens:

-Respirable Crystalline Silica

IARC: [Yes] **NTP:** [Yes] **OSHA:** [Yes] **Other: (ACGIH)** [Yes]

Section 3
Composition/Information on Ingredients

Substance	CAS No.	Percentage (%)	GHS Classification
Crystalline Silica	14808-60-7	20 - 40%	Repeat Dose STOT, Category 1 Carcinogen, Category 1A
Silica, crystalline respirable (RCS)	14808-60-7	See Footnote 1	Repeat Dose STOT, Category 1 Carcinogen, Category 1A
Aluminosilicates ²	Various, see Footnote 2	10 - 60%	Single Exposure STOT, Category 3
Calcium oxide (CaO)	1305-78-8	10 - 30%	Skin Irritant, Category 2 Eye Irritant, Category 1 Single Exposure STOT, Category 3
Iron oxide	1309-37-1	1 - 10%	Not Classified
Manganese dioxide (MnO ₂)	1313-13-9	<2%	Skin Irritant, Category 2 Eye Irritant, Category 2B
Magnesium oxide	1309-48-4	2 - 10%	Not Classified
Phosphorus pentoxide (P ₂ O ₅)	1314-56-3	≤2%	Skin Irritant, Category 2 Eye Irritant, Category 2B
Sodium oxide	1313-59-3	1 - 10%	Not Classified
Potassium oxide (K ₂ O)	12136-45-7	≤1%	Skin Irritant Category 2 Eye Irritant Category 2B
Titanium dioxide (TiO ₂)	13463-67-7	<3%	Not Classified

¹The percentage of respirable crystalline silica has not been determined. Therefore, a GHS classification of Carcinogen 1A has been assigned.

²Aluminosilicates (CAS# 1327-36-2) may be in the form of mullite (CAS# 1302-93-8); aluminosilicate glass; pozzolans (CAS# 71243-67-9); or calcium aluminosilicates such as tricalcium aluminate (C3A), or calcium sulfoaluminate (C4A3S). The form is dependent on the source of the coal and or the process used to create the CCP. Pulverized coal combustion would be more likely to create high levels of pozzolans. Aluminosilicates may have inclusions of calcium, titanium, iron, potassium, phosphorus, magnesium and other metal oxides.

Section 4
First Aid Measures

4.1 Description of First Aid Measures

Inhalation:	If product is inhaled and irritation of the nose or coughing occurs, remove person to fresh air. Get medical advice/attention if respiratory symptoms persist.
Skin Contact:	If skin exposure occurs, wash with soap and water.
Eye Contact:	If product gets into the eye, rinse copiously with water for several minutes. Remove contact lenses, if present and easy to do. Seek medical attention/advice if irritation occurs or persists.
Ingestion:	No specific first aid measures are required.

4.2 Most Important Health Effects, Both Acute and Delayed

Acute Effects: Direct exposure may cause respiratory irritation, eye irritation and skin irritation. The product dust can dry and irritate the skin and cause dermatitis and can irritate eyes and skin through mechanical abrasion.

Chronic Effects: Chronic exposure may cause lung damage from repeated exposure. Prolonged inhalation of respirable crystalline silica above certain concentrations may cause lung diseases, including silicosis and lung cancer.

4.3 Indication of Any Immediate Medical Attention and Special Treatment Needed

Seek first aid or call a doctor or Poison Control Center if contact with eyes occurs and irritation remains after rinsing. Get medical advice if inhalation occurs and respiratory symptoms persist.

**Section 5
 Firefighting Measures**

5.1 Extinguishing Media

Suitable Extinguishing Media:	Product is not flammable. Use extinguishing media appropriate for surrounding fire.
Unsuitable Extinguishing Media:	Not applicable, the product is not flammable.

5.2 Special Hazards Arising from the Substance or Mixture

Hazardous Combustion Products:	None known.
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5.3 Advice for Firefighters

Special Protective Equipment and Precautions for Firefighters:	As with any fire, wear self-contained breathing apparatus (NIOSH approved or equivalent) and full protective gear.
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**Section 6
 Accidental Release Measures**

6.1 Personal Precautions, Protective Equipment and Emergency Procedures

Personal precautions/Protective Equipment:	See Section 8.2.2 Individual Protective Measures. For concentrations exceeding Occupational Exposure Levels (OELs), use a self-contained breathing apparatus (SCBA).
Emergency procedures:	Use scooping, water spraying/flushing/misting or ventilated vacuum cleaning systems to clean up spills. Do not use pressurized air.

6.2 Environmental Precautions

Environmental precautions:	Prevent contamination of drains or waterways and dispose according to local and national regulations.
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6.3 Methods and Material for Containment and Cleaning Up

<p>Methods and materials for containment and cleaning up:</p>	<p>Do not use brooms or compressed air to clean surfaces. Use dust collection vacuum and extraction systems.</p> <p>Large spills of dry product should be removed by a vacuum system. Dampened material should be removed by mechanical means and recycled or disposed of according to local and national regulations.</p>
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See Sections 8 and 13 for additional information on exposure controls and disposal.

**Section 7
 Handling and Storage**

7.1 Precautions for Safe Handling

Practice good housekeeping. Use adequate exhaust ventilation, dust collection and/or water mist to maintain airborne dust concentrations below permissible exposure limits (note: respirable crystalline silica dust may be in the air without a visible dust cloud).

Do not permit dust to collect on walls, floors, sills, ledges, machinery, or equipment. Maintain and test ventilation and dust collection equipment. In cases of insufficient ventilation, wear a NIOSH approved respirator for silica dust when handling or disposing dust from this product. Avoid contact with skin and eyes. Wash or vacuum clothing that has become dusty. Avoid eating, smoking, or drinking while handling the material.

7.2 Conditions for Safe Storage, Including any Incompatibilities

Minimize dust produced during loading and unloading.

Section 8
Exposure Controls/Personal Protection

8.1 Control Parameters

OCCUPATIONAL EXPOSURE LIMITS					
SUBSTANCE		OSHA PEL TWA (mg/m ³)	NIOSH REL TWA (mg/m ³)	ACGIH TLV TWA (mg/m ³)	CA - OSHA PEL (mg/m ³)
Calcium oxide		5	2	2	2
Particulates Not Otherwise Regulated	Total	15	15	10	10
	Respirable	5	5	3	5
Respirable Crystalline Silica	Respirable	0.05	0.05	0.025	0.05
Manganese dioxide (as manganese compounds)	Total	5 (Ceiling)	1 3 (STEL)	0.1	0.2
	Respirable	-	-	0.02	-

8.2 Exposure Controls

8.2.1 Engineering Controls

Provide ventilation to maintain the ambient workplace atmosphere below the occupational exposure limit(s). Use general and local exhaust ventilation and dust collection systems as necessary to minimize exposure.

8.2.2 Personal Protective Equipment (PPE)

Respiratory protection:	Wear a NIOSH approved particulate respirator if exposure to airborne particulates is unavoidable and where occupational exposure limits may be exceeded. If airborne exposures are anticipated to exceed applicable PELs or TLVs, a self-contained breathing apparatus or airline respirator is recommended.
Eye and face protection:	If eye contact is possible, wear protective glasses with side shields. Avoid contact lenses.
Hand and skin protection:	Wear gloves and protective clothing. Wash hands with soap and water after contact with material.

Section 9
Physical and Chemical Properties

9.1 Information on Basic Physical and Chemical Properties

Property: Value	Property: Value
Appearance (physical state, color, etc.): Fine tan/gray particulate	Upper/lower flammability or explosive limits: Not applicable
Odor: Odorless ¹	Vapor Pressure (Pa): Not applicable
Odor threshold: Not applicable	Vapor Density: Not applicable
pH (25 °C) (in water): 8 - 11	Specific gravity or relative density: 2.2 – 2.9
Melting point/freezing point (°C): Not applicable	Water Solubility: Slight
Initial boiling point and boiling range (°C): Not applicable	Partition coefficient: n-octane/water: Not determined
Flash point (°C): Not determined	Auto ignition temperature (°C): Not applicable
Evaporation rate: Not applicable	Decomposition temperature (°C): Not determined
Flammability (solid, gas): Not combustible	Viscosity: Not applicable

¹ The use of urea or aqueous ammonia injected into the flue gas to reduce nitrogen oxides (NOx) emissions may result in the presence of ammonium sulfate or ammonium bisulfate in the ash at less than 0.1%. When ash containing these substances becomes wet under high pH (>9), free ammonia gas may be released resulting in objectionable/nuisance ammonia odor and potential exposure to ammonia gas especially in confined spaces.

Section 10
Stability and Reactivity

10.1 Reactivity:	The material is an inert, inorganic material primarily composed of elemental oxides.
10.2 Chemical stability:	The material is stable under normal use conditions.
10.3 Possibility of hazardous reactions:	The material is a relatively stable, inert material; however, when ash containing ammonia becomes wet under high pH (>9), free ammonia gas may be released resulting in an objectionable/nuisance ammonia odor and potential exposure to ammonia gas especially in confined spaces. Polymerization will not occur.
10.4 Conditions to avoid:	Product can become airborne in moderate winds. Dry material should be stored in silos. Materials stored out of doors should be covered or maintained in a damp condition.
10.5 Incompatible materials:	None known.
10.6 Hazardous decomposition products:	None known.

Section 11
Toxicological Information

11.1 Information on Toxicological Effects

Endpoint	Data
Acute oral toxicity	LD50 > 2000 mg/kg
Acute dermal toxicity	LD50 > 2000 mg/kg
Acute inhalation toxicity	LD50 > 5.0 mg/L
Skin corrosion/irritation	Does not meet the classification criteria but may cause slight skin irritation. Product dust can dry the skin which can result in irritation.
Eye damage/irritation	Causes serious eye irritation. Positive scores for conjunctiva irritation and chemosis in 2/3 animals based on average of 24, 48 and 72-hour scores with irritation clearing within 21 days; no corneal or iritis effects observed.
Respiratory/skin sensitization	Not a respiratory or dermal sensitizer.
Germ cell mutagenicity	Not mutagenic in in-vitro and in-vivo assays with or without metabolic activation.
Carcinogenicity	Not available. Respirable crystalline silica has been identified as a carcinogen by OSHA, NTP, ACGIH and IARC.
Reproductive toxicity	No developmental toxicity was observed in available animal studies. Reproductive studies on CCPs showed either no reproductive effects, or some effects on male and female reproductive organs and parameters but without a clear dose response.
STOT-SE	CCPs when present as a nuisance dust may result in respiratory irritation.
STOT-RE	In a 180-day inhalation study with fly ash dust, no effects were observed at the highest dose tested. NOEC = 4.2 mg/m ³ ; it is not possible to assess the level at which toxicologically significant effects may occur. Repeated inhalation exposures to high levels of respirable crystalline silica may result in lung damage (i.e., silicosis).
Aspiration Hazard	Not applicable based product form.

**Section 12
 Ecological Information**

12.1 Toxicity

Fly Ash (CAS# 68131-74-8)	
Toxicity to Fish	LC50 > 100 mg/L
Toxicity to Aquatic Invertebrates	Data indicates that the test substance is not toxic to <i>Daphnia magna</i> (EC50 undetermined)
Toxicity to Aquatic Algae and Plants	EC50 = 10 mg/L
Calcium oxide CAS# 1305-78-8	
Toxicity to Fish	LC50 = 50.6 mg/L The findings were closely related to the pH of the test solutions; therefore, pH is considered to be the main reason for the effects.
Toxicity to Aquatic Invertebrates	EC50 = 49.1 mg/L The findings were closely related to the pH of the test solutions; therefore, pH is considered to be the main reason for the effects.
Toxicity to Aquatic Algae and Plants	NOEC = 48 mg/L @ 72 hours based on Ca(OH) ₂ The initial pH of the test medium was not directly related to the biologically relevant effects. The formation of precipitates is likely the result of the reaction between CO ₂ dissolved in the medium.

12.2 Persistence and Degradability

Not relevant for inorganic materials.

12.3 Bioaccumulative Potential

This material does not contain any compounds that would bioaccumulate up the food chain.

12.4 Mobility in Soil

No data available.

12.5 Results of PBT and vPvB Assessment

This material does not contain any compounds classified as “persistent, bioaccumulative or toxic” nor as “very persistent/very bioaccumulative”.

12.6 Other Adverse Effects

None known.

**Section 13
 Disposal Considerations**

See Sections 7 and 8 above for safe handling and use, including appropriate industrial hygiene practices.
 Dispose of all waste product and containers in accordance with federal, state and local regulations.

**Section 14
 Transport Information**

Regulatory entity: U.S. DOT	Shipping Name:	Not Regulated
	Hazard Class:	Not Regulated
	ID Number:	Not Regulated
	Packing Group:	Not Regulated

Section 15
Regulatory Information

15.1 Safety, Health and Environmental Regulations/Legislation Specific for the Mixture

- TSCA Inventory Status

All components are listed on the TSCA Inventory.

- California Proposition 65

The following substances are known to the State of California to be carcinogens and/or reproductive toxicants:

- Respirable crystalline silica
- Titanium dioxide

- State Right-to-Know (RTK)

Component	CAS	MA ^{1,2}	NJ ^{3,4}	PA ⁵	RI ⁶
Ammonium bisulfate	7803-63-6	No	Yes	No	No
Ammonium sulfate	7783-20-2	Yes	No	Yes	No
Calcium oxide	1305-78-8	Yes	Yes	Yes	No
Iron oxide	1309-37-1	Yes	Yes	Yes	No
Magnesium oxide	1309-48-4	No	Yes	No	No
Phosphorus pentoxide (or phosphorus oxide)	1314-56-3	Yes	Yes	Yes	No
Potassium oxide	12136-45-7	No	Yes	No	No
Silica-crystalline (SiO ₂), quartz	14808-60-7	Yes	Yes	Yes	No
Sodium oxide	1313-59-3	No	Yes	No	No
Titanium dioxide	13463-67-7	Yes	Yes	Yes	Yes

¹ Massachusetts Department of Public Health, no date

² 189th General Court of The Commonwealth of Massachusetts, no date

³ New Jersey Department of Health and Senior Services, 2010a

⁴ New Jersey Department of Health, 2010b

⁵ Pennsylvania Code, 1986

⁶ Rhode Island Department of Labor and Training, no date

Section 16

Other Information, Including Date of Preparation or Last Revision

16.1 Indication of Changes

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- TWA: Time-weighted average
- UEL: Upper explosive limit
- UVCB: Unknown or Variable Composition/Biological
- U.S.: United States
- U.S. DOT: United States of Department of Transportation



16.3 Other Hazards

Hazardous Materials Identification System (HMIS)						
Degree of hazard (0= low, 4 = extreme)						
Health:	2*	Flammability:	0	Physical Hazards:	0	Personal protection:**

* Chronic Health Effects

** Appropriate personal protection is defined by the activity to be performed.
See Section 8 for additional information.

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ATTACHMENT D

Memorandum



Date: 25 October 2021

Subject: 35 Ill. Admin. Code Part 845 - Fault Area Location Demonstration for East Ash Pond at the Hennepin Power Plant

Dynergy Midwest Generation, LLC (DMG) operates the coal-fired Hennepin Power Plant located in Putnam County, Illinois. The East Ash Pond is an existing surface impoundment storing coal combustion residuals (CCR). The requirements for the East Ash Pond are found in 35 Ill. Admin. Code (I.A.C.) 845 (Part 845).

This memorandum addresses the requirements of Section 845.320 Fault Areas, which states:

Section 845.320 Fault Areas

- a) *Existing and new CCR surface impoundments, and all lateral expansions of CCR surface impoundments must not be located within 60 meters (200 feet) of the outermost damage zone of a fault that has had displacement in Holocene time unless the owner or operator demonstrates that an alternative setback distance of less than 60 meters (200 feet) will prevent damage to the structural integrity of the CCR surface impoundment.*
- b) *The owner or operator of the CCR surface impoundment must obtain a certification from a qualified professional engineer stating that the demonstration meets the requirements of subsection (a).*

Pursuant to Section 845.210(d)(2), for existing CCR surface impoundments, the owner or operator of the CCR surface impoundment may use a previously completed location restriction demonstration required by Section 845.300 (Placement Above the Uppermost Aquifer), Section 845.310 (Wetlands), Section 845.320 (Fault Areas), Section 845.330 (Seismic Impact Zones), and Section 845.340 (Unstable Areas), provided that the previously completed assessments meet the applicable requirements of those Sections.

The previous fault area demonstration was certified by a qualified professional engineer stating that the demonstration meets the requirements of 40 C.F.R. § 257.62. The requirements described in 40 C.F.R. § 257.62 are nearly identical to the requirements contained in I.A.C. Section 845.320. Pursuant to Section 845.210(d)(2), a certification is not required for this demonstration. The previously completed fault area demonstration is included in Attachment D.



HALEY & ALDRICH, INC.
6500 Rockside Road
Suite 200
Cleveland, OH 44131
216.739.0555

MEMORANDUM

16 October 2018

File No. 129788

SUBJECT: Location Restriction Demonstration - Fault Areas
Hennepin Power Station
East Ash Pond
Hennepin, Illinois


Dynegy Midwest Generation, LLC operates the coal-fired Hennepin Power Station (Plant) located near Hennepin, Illinois. The East Ash Pond (Unit) is an existing coal combustion residuals (CCR) surface impoundment. This demonstration addresses the requirements of 40 CFR §257.62 (*Fault Areas*) of the U.S. Environmental Protection Agency's (EPA) rule entitled *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities*. 80 Fed. Reg. 21,302 (Apr. 17, 2015) (promulgating 40 CFR §257.62); 83 Fed. Reg. 36,435 (July 30, 2018) (amending 40 CFR §257.62).

§257.62(a): New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located within 60 meters (200 feet) of the outermost damage zone of a fault that has had displacement in Holocene time unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that an alternative setback distance of less than 60 meters (200 feet) will prevent damage to the structural integrity of the CCR unit.

A review of available data from the U.S. Geologic Survey, the Illinois State Geological Survey, and other available information was completed for this demonstration. The nearest known mapped faults area a series of four unnamed faults associated with the Troy Grove Dome, which is located approximately 11 miles northeast and the timeframe of the most recent activity on these faults is not known. Based on the available published geologic data and information reviewed, there are no active faults or fault damage zones that have had displacement in Holocene time reported or indicated within 200 feet of the Unit.

§257.62(b): *The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the demonstration meets the requirements of paragraph (a) of this section.*

I, Steven F. Putrich, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief, that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the demonstration that the CCR Unit is not located within 60 meters (200 feet) of the outermost damage zone of a fault that has had a displacement in Holocene time as included in the CCR Rule Location Restrictions Evaluation memorandum dated 12 October 2018 meets the requirements of 40 CFR §257.62(a).

Signed: 
Consulting Engineer

Print Name: Steven F. Putrich
Illinois License No.: 62048779
Title: Vice President
Company: Haley & Aldrich, Inc.

Professional Engineer's Seal:



Memorandum



Date: 25 October 2021

Subject: 35 Ill. Admin. Code Part 845 - Placement Above the Uppermost Aquifer Location Demonstration for East Ash Pond at the Hennepin Power Plant

Dynegy Midwest Generation, LLC (DMG) operates the coal-fired Hennepin Power Plant located in Putnam County, Illinois. The East Ash Pond is an existing surface impoundment storing coal combustion residuals (CCR). The requirements for the East Ash Pond are found in 35 Ill. Admin. Code (I.A.C.) 845 (Part 845).

This memorandum addresses the requirements of Section 845.300 Placement Above the Uppermost Aquifer, which states:

Section 845.300 Placement Above the Uppermost Aquifer

- a) Existing and new CCR surface impoundments, and all lateral expansions of CCR surface impoundments must, be constructed with a base that is located at least 1.52 meters (five feet) above the upper limit of the uppermost aquifer, or must demonstrate that there will not be an intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR surface impoundment and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table).
- b) The owner or operator of the CCR surface impoundment must obtain a certification from a qualified professional engineer stating that the demonstration meets the requirements of subsection (a).

Pursuant to Section 845.210(d)(2), for existing CCR surface impoundments, the owner or operator of the CCR surface impoundment may use a previously completed location restriction demonstration required by Section 845.300 (Placement Above the Uppermost Aquifer), Section 845.310 (Wetlands), Section 845.320 (Fault Areas), Section 845.330 (Seismic Impact Zones), and Section 845.340 (Unstable Areas), provided that the previously completed assessments meet the applicable requirements of those Sections.

The previous upper aquifer demonstration was certified by a qualified professional engineer stating that the demonstration meets the requirements of 40 C.F.R. § 257.60. The requirements described in 40 C.F.R. § 257.60 are nearly identical to the requirements contained in I.A.C. Section 845.300. Pursuant to Section 845.210(d)(2), a certification is not required for this demonstration. The previously completed upper aquifer demonstration is included in Attachment D.



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216.739.0555

MEMORANDUM

16 October 2018

File No. 129788

SUBJECT: Location Restriction Demonstration – Placement Above Uppermost Aquifer
East Ash Pond
Hennepin Power Station
Hennepin, Illinois

Dynergy Midwest Generating, LLC operates the coal-fired Hennepin Power Station (Plant) located near Hennepin, Illinois. The East Ash Pond (Unit) is an existing coal combustion residuals (CCR) surface impoundment. This demonstration addresses the requirements of 40 CFR §257.60 (*Placement above the uppermost aquifer*) of the U.S. Environmental Protection Agency's (EPA) rule entitled *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities*. 80 Fed. Reg. 21,302 (Apr. 17, 2015) (promulgating 40 CFR §257.60); 83 Fed. Reg. 36,435 (July 30, 2018) (amending 40 CFR §257.60).


§257.60(a): New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must be constructed with a base that is located no less than 1.52 meters (five feet) above the upper limit of the uppermost aquifer, or must demonstrate that there will not be an intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table). The owner or operator must demonstrate by the dates specified in paragraph (c) of this section that the CCR unit meets the minimum requirements for placement above the uppermost aquifer.

Haley & Aldrich reviewed available information provided by Vistra including historic record drawings and design drawings and based on review and evaluation of the information provided, the results do not demonstrate compliance with the requirements of 40 CFR §257.60(a).

Hennepin Power Station - East Ash Pond
Location Restriction – Placement Above Uppermost Aquifer
16 October 2018
Page 2

§257.60(b): *The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the demonstration meets the requirements of paragraph (a) of this section.*

I, Steven F. Putrich, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief, that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify that the above-referenced CCR Unit does not meet the requirements of 40 CFR §257.60(a).

Signed: 
Consulting Engineer

Print Name: Steven F. Putrich
Illinois License No.: 62048779
Title: Vice President
Company: Haley & Aldrich, Inc.

Professional Engineer's Seal:



Memorandum



Date: 25 October 2021

Subject: 35 Ill. Admin. Code Part 845 – Seismic Impact Zone Location Demonstration for East Ash Pond at the Hennepin Power Plant

Dynegy Midwest Generation, LLC (DMG) operates the coal-fired Hennepin Power Plant located in Putnam County, Illinois. The East Ash Pond is an existing surface impoundment storing coal combustion residuals (CCR). The requirements for the East Ash Pond are found in 35 Ill. Admin. Code Part (I.A.C.) 845 (Part 845).

This memorandum addresses the requirements of Section 845.330 Seismic Impact Zones, which states:

Section 845.330 Seismic Impact Zones

- a) *Existing and new CCR surface impoundments, and all lateral expansions of CCR surface impoundments must not be located in seismic impact zones unless the owner or operator demonstrates that all structural components including liners, leachate collection and removal systems, and surface water control systems, are designed to resist the maximum horizontal acceleration in lithified earth material for the site.*
- b) *The owner or operator of the CCR surface impoundment must obtain a certification from a qualified professional engineer stating that the demonstration meets the requirements of subsection (a).*

Pursuant to Section 845.210(d)(2), for existing CCR surface impoundments, the owner or operator of the CCR surface impoundment may use a previously completed location restriction demonstration required by Section 845.300 (Placement Above the Uppermost Aquifer), Section 845.310 (Wetlands), Section 845.320 (Fault Areas), Section 845.330 (Seismic Impact Zones), and Section 845.340 (Unstable Areas), provided that the previously completed assessments meet the applicable requirements of those Sections.

The previous seismic impact zone demonstration was certified by a qualified professional engineer stating that the demonstration meets the requirements of 40 C.F.R. § 257.63. The requirements described in 40 C.F.R. § 257.63 are nearly identical to the requirements contained in I.A.C. Section 845.330. Pursuant to Section 845.210(d)(2), a certification is not required for this demonstration. The previously completed seismic impact zone demonstration is included in Attachment D.



HALEY & ALDRICH, INC.
6500 Rockside Road
Suite 200
Cleveland, OH 44131
216.739.0555

MEMORANDUM

16 October 2018
File No. 129788

SUBJECT: Location Restriction Demonstration – Seismic Impact Zone
Hennepin Power Station
East Ash Pond
Hennepin, Illinois


Dynergy Midwest Generation, LLC operates the coal-fired Hennepin Power Station (Plant) located near Hennepin, Illinois. The East Ash Pond (Unit) is an existing coal combustion residuals (CCR) surface impoundment. This demonstration addresses the requirements of 40 CFR §257.63 (*Seismic Impact zones*) of the U.S. Environmental Protection Agency's (EPA) rule entitled *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities*. 80 Fed. Reg. 21,302 (Apr. 17, 2015) (promulgating 40 CFR §257.63); 83 Fed. Reg. 36,435 (July 30, 2018) (amending 40 CFR §257.63).

§257.63(a): New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located in seismic impact zones unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that all structural components including liners, leachate collection and removal systems, and surface water control systems, are designed to resist the maximum horizontal acceleration in lithified earth material for the site.

A Seismic Impact Zone is defined in the CCR Rule (40 CFR §257.63) as “an area having a 2% or greater probability that the maximum expected horizontal acceleration, expressed as a percentage of the earth's gravitational pull (g), will exceed 0.10 g in 50 years.” The 2014 US Geological Survey Hazard Map raw data for the Hennepin Power Station East Ash Pond indicates that the maximum expected horizontal acceleration for 2 percent probability of exceedance in 50 years is 0.07g. Accordingly, the Unit is not located in a seismic impact zone and a demonstration that the structural components have been designed to resist the maximum horizontal acceleration in lithified earth material for the site is not required.

§257.63(b): *The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the demonstration meets the requirements of paragraph (a) of this section.*

I, Steven F. Putrich, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief, that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, that the CCR Unit is not located in a seismic impact zone as included in the CCR Rule Location Restrictions Evaluation memorandum dated 12 October 2018 and, therefore, satisfies all requirements of 40 CFR §257.63(a).

Signed: 
Consulting Engineer

Print Name: Steven F. Putrich
Illinois License No.: 62048779
Title: Vice President
Company: Haley & Aldrich, Inc.

Professional Engineer's Seal:



Memorandum



Date: 25 October 2021

Subject: 35 Ill. Admin. Code Part 845 – Unstable Areas Location Standard Demonstration for East Ash Pond at the Hennepin Power Plant

Dynegy Midwest Generation, LLC (DMG) operates the coal-fired Hennepin Power Plant located in Putnam County, Illinois. The East Ash Pond is an existing surface impoundment storing coal combustion residuals (CCR). The requirements for the East Ash Pond are found in 35 Ill. Admin. Code Part (I.A.C.) 845 (Part 845).

This memorandum addresses the requirements of Section 845.340 Unstable Areas which states:

Section 845.340 Unstable Areas

- a) *An existing or new CCR surface impoundment, or any lateral expansion of a CCR surface impoundment must not be located in an unstable area unless the owner or operator demonstrates that recognized and generally accepted engineering practices have been incorporated into the design of the CCR surface impoundment to ensure that the integrity of the structural components of the CCR surface impoundment will not be disrupted.*
- b) *The owner or operator must consider all the following factors, at a minimum, when determining whether an area is unstable:*
 - 1) *On-site or local soil conditions, including liquefaction, that may result in significant differential settling;*
 - 2) *On-site or local geologic or geomorphologic features; and*
 - 3) *On-site or local human-made features or events (both surface and subsurface)*
- d) *The owner or operator of the CCR surface impoundment must obtain a certification from a qualified professional engineer stating that the demonstration meets the requirements of subsections (a).*

Demonstration of compliance with Section 845.340(a) and (b) – Unstable Areas:

Pursuant to Section 845.210(d)(2), for existing CCR surface impoundments, the owner or operator of the CCR surface impoundment may use a previously completed location restriction demonstration required by Section 845.300 (Placement Above the Uppermost Aquifer), Section 845.310 (Wetlands), Section 845.320 (Fault Areas), Section 845.330 (Seismic Impact Zones),

I.A.C. Part 845 – Unstable Areas Location Demonstration for East Ash Pond at the Hennepin Power Plant

25 October 2021

Page 2

and Section 845.340 (Unstable Areas), provided that the previously completed assessments meet the applicable requirements of those Sections.

The previous unstable area demonstration was certified by a qualified professional engineer stating that the demonstration meets the requirements of 40 C.F.R. § 257.64. The requirements described in 40 C.F.R. § 257.64 are nearly identical to the requirements contained in I.A.C. Section 845.340. Pursuant to Section 845.210(d)(2), a certification is not required for the unstable area demonstration. The previously completed unstable area demonstration is included in Attachment D.



HALEY & ALDRICH, INC.
6500 Rockside Road
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216.739.0555

MEMORANDUM

16 October 2018

File No. 129788

SUBJECT: Location Restriction Demonstration – Unstable Areas
Hennepin Power Station
East Ash Pond
Hennepin, Illinois

Dynegy Midwest Generation, LLC operates the coal-fired Hennepin Power Station (Plant) located near Hennepin, Illinois. The East Ash Pond (Unit) is an existing coal combustion residuals (CCR) surface impoundment. This demonstration addresses the requirements of 40 CFR §257.64 (*Unstable Areas*) of the U.S. Environmental Protection Agency's (EPA) rule entitled *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities*. 80 Fed. Reg. 21,302 (Apr. 17, 2015) (promulgating 40 CFR §257.64); 83 Fed. Reg. 36,435 (July 30, 2018) (amending 40 CFR §257.64).

§257.64(a): An existing or new CCR landfill, existing or new CCR surface impoundment, or any lateral expansion of a CCR unit must not be located in an unstable area unless the owner or operator demonstrates by the dates specified in paragraph (d) of this section that recognized and generally accepted good engineering practices have been incorporated into the design of the CCR unit to ensure that the integrity of the structural components of the CCR unit will not be disrupted.

§257.64(b): The owner or operator must consider all of the following factors, at a minimum, when determining whether an area is unstable:

- (1) On-site or local soil conditions that may result in significant differential settling;*
- (2) On-site or local geologic or geomorphologic features; and*
- (3) On-site or local human-made features or events (both surface and subsurface).*

Determination of compliance with §257.64(b)(1) - Conditions associated with the potential for significant differential settlement due to liquefaction were not identified in the area where the Plant is located. A separate report completed by AECOM entitled "CCR Certification Report: Initial Structural Stability Assessment, Initial Safety Factor Assessment, and Initial Inflow Design Flood Control System Plan for the East Ash Pond at Hennepin Power Station" dated October 2016 concluded that the soils beneath the Unit are not susceptible to liquefaction.


Determination of compliance with §257.64(b)(2) - Based on available United States Geological Survey (USGS), Illinois State Geological Survey (ISGS) information, and communication with Vistra representatives familiar with the Plant's history, karst topography or physiographic features such as sinkholes, vertical shafts, sinking streams, caves, large springs, or blind valleys do not exist at the Plant. To evaluate the susceptibility of landslides, we reviewed readily available USGS and ISGS data. The USGS data indicates that the Plant is in an area of high landslide susceptibility and low landslide incidence,

however more detailed ISGS data indicates that there has not been a documented landslide occurrence at the Unit. The closest ISGS documented landslide occurrences are approximately 3.5 to 5 miles away from the site and appear to be roadway landslides associated with Illinois Route 26 and Illinois Route 89. Accordingly, it is our opinion that the Unit is not located in an area that has high susceptibility to landslides.

Determination of compliance with §257.64(b)(3) - There are no documented surface or subsurface anthropogenic activities that would be indicative of creating unstable foundation conditions.

§257.64(c): The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the demonstration meets the requirements of paragraph (a) of this section.

I, Steven F. Putrich, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief, that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the demonstration indicating the CCR Unit is not located in an unstable area as included in the CCR Rule Location Restrictions Evaluation memorandum dated 12 October 2018 meets the requirements of 40 CFR §257.64(a).

Signed: 
Consulting Engineer

Print Name: Steven F. Putrich
Illinois License No.: 62048779
Title: Vice President
Company: Haley & Aldrich, Inc.

Professional Engineer's Seal:





Hennepin Power Plant Operating Permit Application: Floodplain Compliance for 35 I.A.C. 845.340(c)

Dynegy Midwest Generation, LLC

**Revision 1
10/20/2021**



**Hennepin Power Plant
Operating Permit Application:
Floodplain Compliance for 35
I.A.C. 845.340(c)**

prepared for

**Dynegy Midwest Generation, LLC
Village of Hennepin, Illinois**

**Revision 1
10/20/2021**

prepared by

**Burns & McDonnell
Kansas City, Missouri**

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INDEX AND CERTIFICATION

Dynegy Midwest Generation, LLC
Hennepin Power Plant
Operating Permit Application: Floodplain Compliance for 35 I.A.C. 845.340(c)

Report Index

<u>Chapter Number</u>	<u>Chapter Title</u>	<u>Number of Pages</u>
1.0	Introduction	1
2.0	Data Availability and Analysis	4
3.0	Conclusion	2
4.0	References	1

Certification

I hereby certify, as a Professional Engineer in the state of Illinois, that the information in this document was assembled under my direct personal charge. This report is not intended or represented to be suitable for reuse by the Dynegy Midwest Generation, LLC or others without specific verification or adaptation by the Engineer. I hereby certify, for East Ash Pond CCR impoundment discussed herein, that demonstration regarding floodplains meets requirements of 35 I.A.C. 845.340(c).

Madison R. Gibler, P.E., IL, 062.070771

Signature: Madison R Gibler

Date of Signing: October 20, 2021

Date of License Expiration: November 30, 2021



TABLE OF CONTENTS

	<u>Page No.</u>
1.0 INTRODUCTION	1-1
2.0 DATA AVAILABILITY AND ANALYSIS	2-1
2.1 Flood Insurance Rate Maps	2-1
2.2 Flood Insurance Study	2-2
2.3 Effective Hydraulic Model	2-2
2.4 Closure of West Ash Pond.....	2-4
3.0 CONCLUSION	3-1
4.0 REFERENCES.....	4-1
APPENDIX A – EXCERPT FROM 35 I.A.C. 845.340(C).....	4-1
APPENDIX B – FEMA FLOOD INSURANCE RATE MAPS	4-2
APPENDIX C – TECHNICAL ASSESSMENT OF RIVER AND DAM SAFETY IMPACTS FOR THE CLOSURE OF CCR PONDS.....	4-3

LIST OF TABLES

Page No.

Table 2-1: Base Flood Elevations (BFEs) 2-3

LIST OF FIGURES

Page No.

Figure 1-1: Hennepin Power Plant CCR Surface Impoundments 1-1
Figure 2-1: East Ash Pond on FIRM 17155C0025E 2-1
Figure 2-2: Illinois River Cross Sections Near Hennepin Power Plant 2-3
Figure 3-1: Inundation Extents and Significant Elevations 3-1

1.0 INTRODUCTION

Burns & McDonnell was hired by Dynegy Midwest Generation, LLC to evaluate compliance with 35 I.A.C. 845.340(c) (2021) for the existing coal combustion residual (CCR) surface impoundment at the Hennepin Power Plant in the Village of Hennepin, Putnam County, Illinois. The Hennepin Power Plant (plant) currently has one CCR impoundment in operation, the East Ash Pond. The plant also had three additional CCR impoundments that have since been closed: the West Ash Pond, Ash Pond 2, and Ash Pond 4. The East Ash Pond was constructed and went into operation in 1996. The Hennepin Power Plant and CCR surface impoundments are located south of the Illinois River, as shown in Figure 1-1.

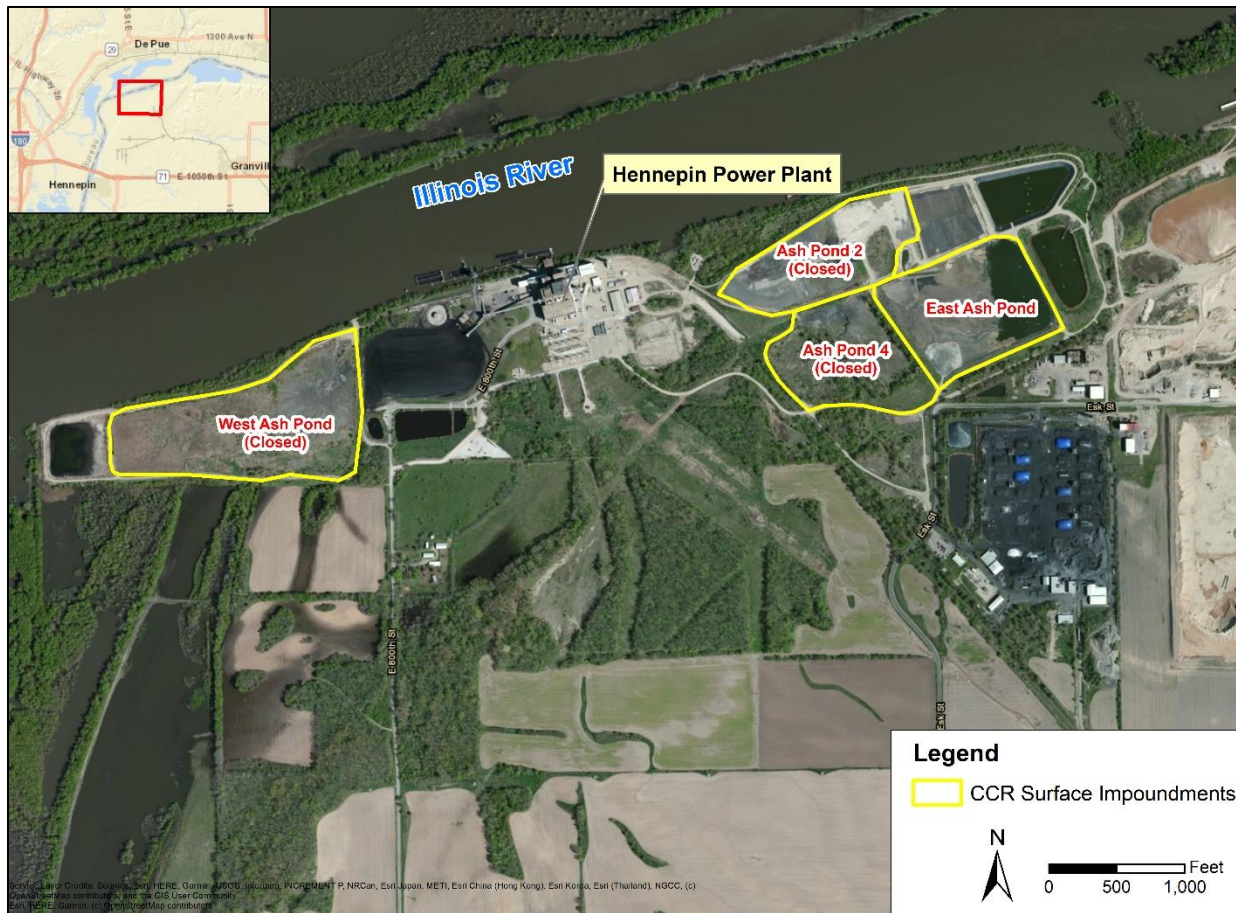


Figure 1-1: Hennepin Power Plant CCR Surface Impoundments

This report summarizes the evaluation of the existing East Ash Pond CCR impoundment for compliance with 35 I.A.C. 845.340(c) (2021), herein referred to as “floodplain compliance.” See Appendix A – Excerpt from 35 I.A.C. 845.340(c) for compliance requirements.

2.0 DATA AVAILABILITY AND ANALYSIS

2.1 Flood Insurance Rate Maps

The Hennepin Power Plant is split between two current Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs), 17155C0015E and 17155C0025E, both with an effective date of February 4, 2011. The currently operating East Ash Pond and the closed Ash Pond 2 and Ash Pond 4 are included in map number 17155C0025E, while the closed West Ash Pond is depicted on map number 17155C0015E. Copies of the FIRMS are provided in Appendix B – FEMA Flood Insurance Rate Maps. The East Ash Pond is located between river mile 212.4 and 212.9 and is delineated in “red” on Figure 2-1.

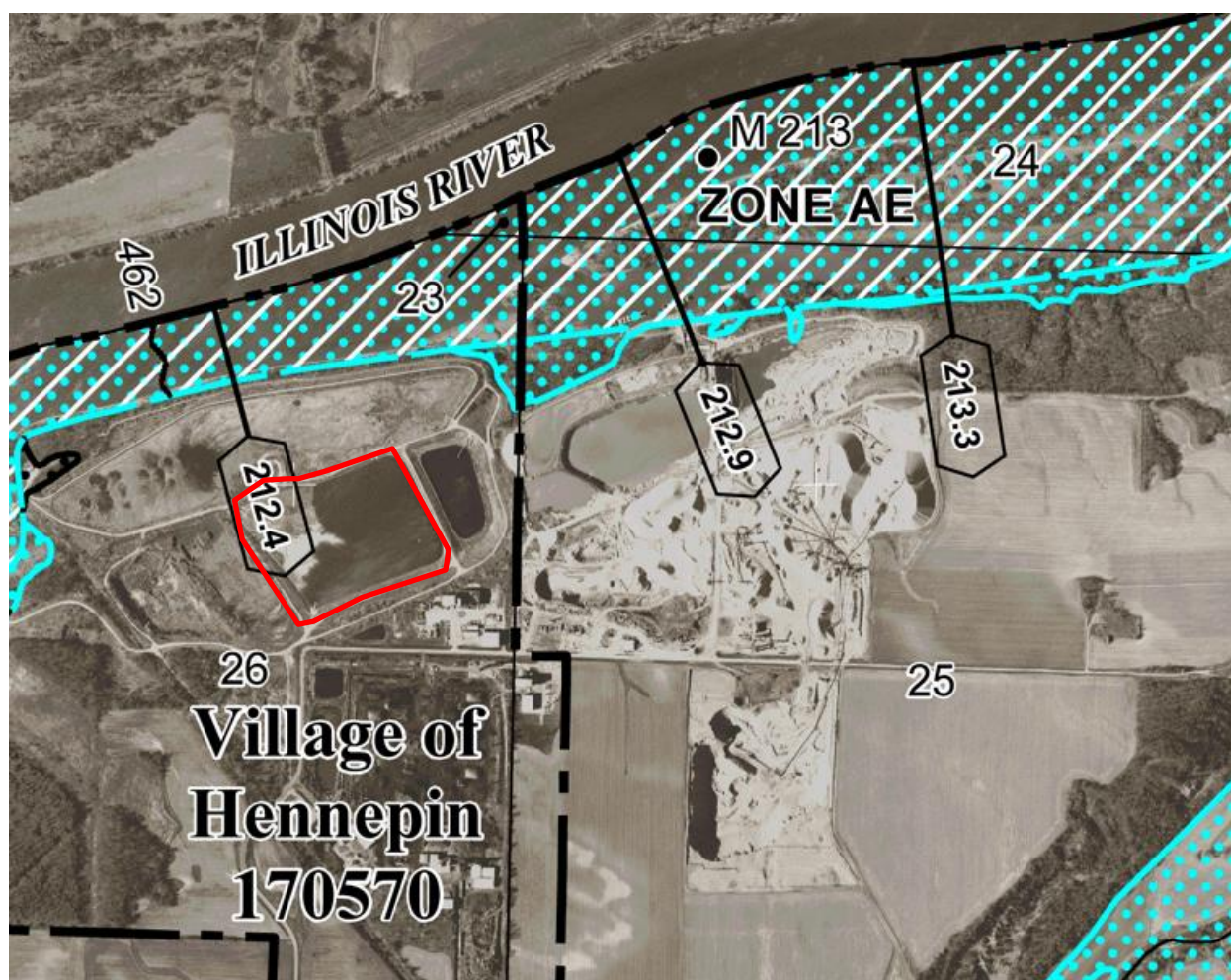


Figure 2-1: East Ash Pond on FIRM 17155C0025E

After review of the effective FIRM number 17155C0025E, the East Ash Pond appears to be located outside of the regulatory floodway and the area inundated by the base flood (the 1% annual chance flood), Zone AE in Figure 2-1.

2.2 Flood Insurance Study

The effective FEMA Flood Insurance Study (FIS) for Putnam County, study number 17155CV000A, has an effective date of February 4, 2011. According to the FIS, the hydrologic and hydraulic analysis was based on the *Upper Mississippi River System Flow Frequency Study* published in January 2004 (FEMA, 2011c). Cross sections for the Illinois River between river mile 80.2 and 286, which includes the area near the Hennepin Power Plant, were created using data from 1998 aerial photography and photogrammetry as well as digital hydrographic surveys collected from 1997 or later and supplemented with United States Geological Survey (USGS) National Elevation Dataset 1/3 arc second coverage (FEMA, 2011c). Because the East Ash Pond CCR impoundment was constructed in 1996, its impacts would have been accounted for in the 2011 FIS.

According to the FIS floodway data table, the base flood elevation for the cross sections at river miles 212.9 and 212.4, upstream and downstream of East Ash Pond, is 462.0 and 461.9 feet North American Vertical Datum of 1988 (NAVD88), respectively. Therefore, the base flood elevation of the East Ash Pond is estimated to be 462.0 feet. Unless otherwise noted, all elevations referenced in this report refer to NAVD88.

2.3 Effective Hydraulic Model

A copy of the effective hydraulic model for the Illinois River between river mile 157.75 and 230.91 was obtained from the FEMA Engineering Library on August 19, 2021, (USACE Rock Island District, 2005). The model was developed in 2005 using HEC-RAS version 3.1.3. The 100-year water surface elevations were calibrated to the results developed from the January 2004 *Upper Mississippi River System Flow Frequency Study*. The model files were converted to HEC-RAS version 6.0, and results were compared to the regulatory base flood elevations. Review of the model files confirmed that the CCR impoundment was represented in the ground elevations for the cross section at river mile 212.4.

Geospatial locations of the cross sections and the river centerline were obtained from the FEMA's National Flood Hazard Layer (NFHL) geographic information system (GIS) data (FEMA, 2011d). Figure 2-2 provides the locations of these cross sections.

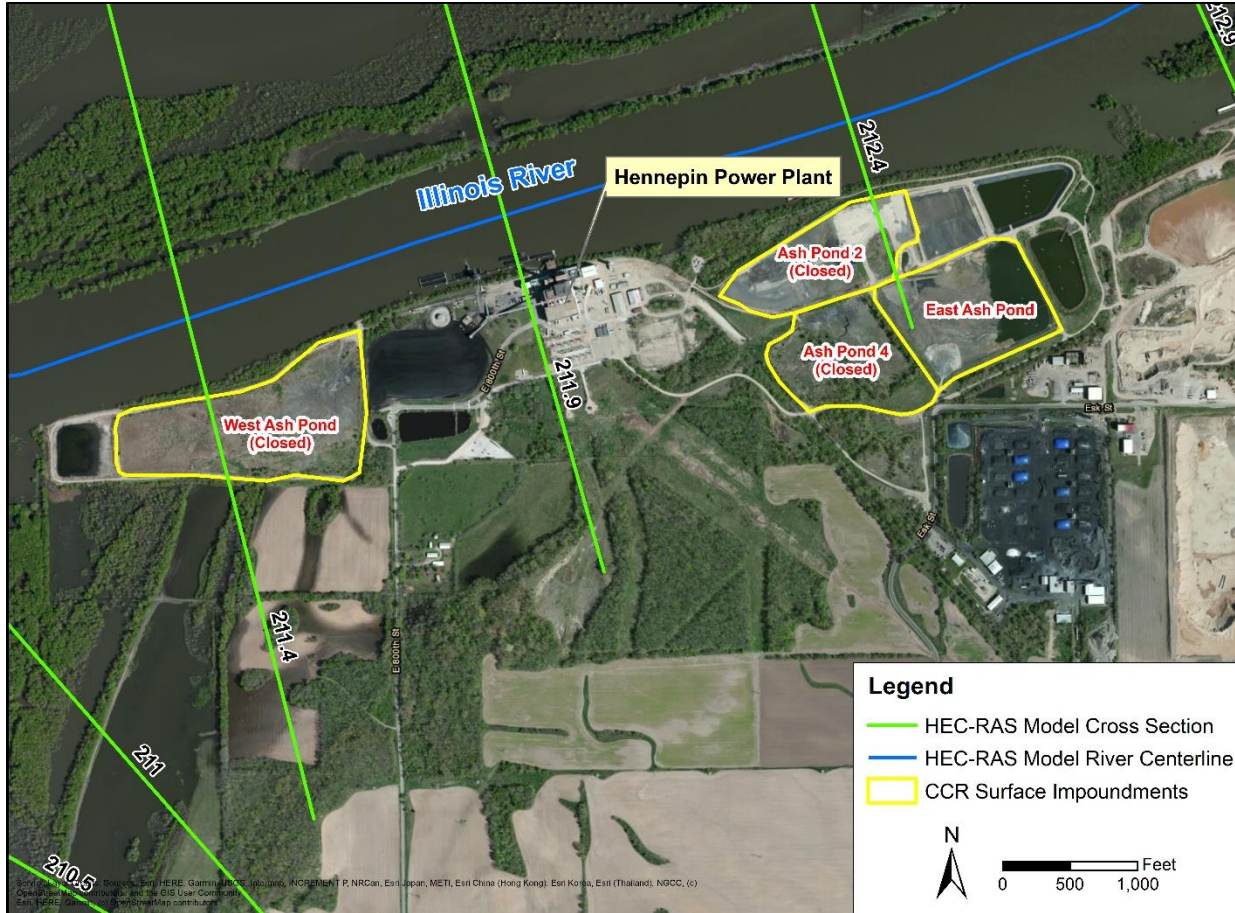


Figure 2-2: Illinois River Cross Sections Near Hennepin Power Plant

Modeling results were within 0.1-feet of the base flood elevations published in the FIS. Table 2-1 provides a comparison of the FIS base flood elevation and model results.

Table 2-1: Base Flood Elevations (BFEs)

Cross Section (River Mile)	FIS BFE (feet)	Model BFE (feet)
211.4	461.9	462.0
211.9	461.9	462.0
212.4	461.9	462.0
212.9	462.0	462.1

2.4 Closure of West Ash Pond

Closure of West Ash Pond was documented in *Technical Assessment of River and Dam Safety Impacts for the Closure of CCR Ponds* (Hanson Professional Services, Inc., 2020). The report states that the closure of the West Ash Pond was approved by the Illinois Environmental Protection Agency on June 19, 2018, with construction anticipated to be completed by November 17, 2020. The report also references a hydraulic analysis for the “worst-case”, stating that the “[post-closure] grading creates a maximum water surface elevation over [pre-closure] of 0.00-ft and increase in channel velocity of 0.01-ft/s for all flows modeled.” However, Appendix G of the report, which contains the model output summary, was not included. Model files developed for the report by Hanson Professional Services were not evaluated as part of this analysis. Therefore, it is assumed that the base flood was included in the “worst-case” analysis, which resulted in no increase in water surface elevation. No Letter of Map Amendment (LOMA) was available on FEMA’s Map Service Center related to the West Ash Pond closure project.

3.0 CONCLUSION

Topographic/contour data at the Hennepin Power Plant and CCR impoundments was obtained from the Illinois Geospatial Data Clearinghouse (Illinois Geospatial Data Clearinghouse, 2012). Based on the topographic data, the top of embankment elevation for East Ash Pond is 493 feet. The effective regulatory floodway, areas inundated by the 1% and 0.2% annual chance floods, base flood elevations, and the contour line of the top of embankment elevation for East Ash Pond is provided in Figure 3-1.

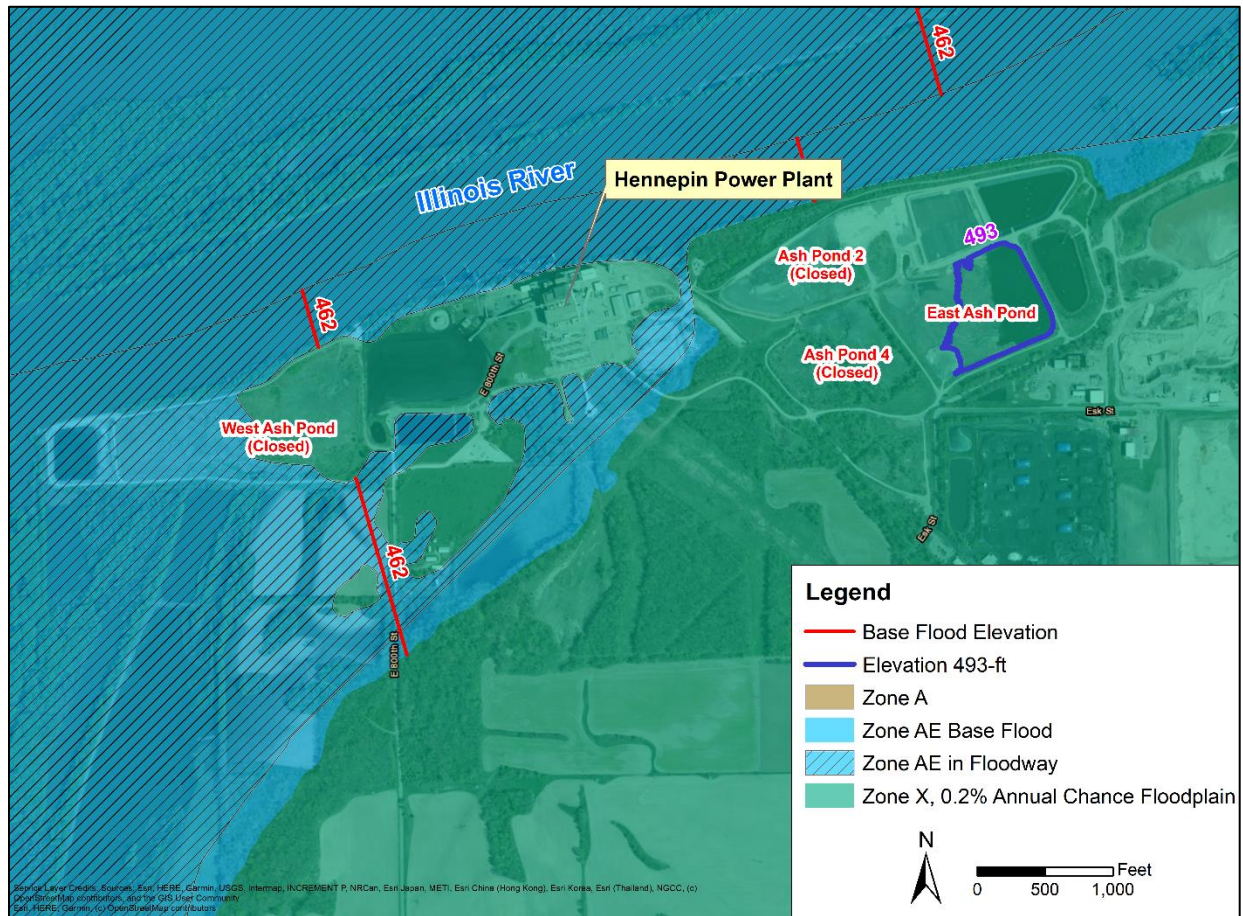


Figure 3-1: Inundation Extents and Significant Elevations

As seen in Figure 3-1, the top of embankment for East Ash Pond is located outside of the area subject to inundation by the 1% annual chance flood and has a top of embankment elevation of 493 feet. This is above the base flood elevation of 462.0 feet. Therefore, East Ash Pond is not subject to inundation by the base flood.

Since the construction of the East Ash Pond was completed in 1996 and the topographic information used to develop the hydraulic model (from which the regulatory floodway and the area inundated by the based flood was defined) was collected in 1997, the East Ash Pond does not restrict the flow of the base flood and does not reduce the temporary water storage capacity of the floodplain. The regulatory floodway is defined as the area that “must be reserved in order to discharge the base flood” (FEMA, 2020). Therefore, since the topography of the East Ash Pond was already included in the hydraulic model that determined the regulatory floodway, the East Ash Pond does not restrict this base flood discharge. Likewise, the topography of the East Ash Pond was included in the hydraulic model that determined the extents of the area inundated by the base flood. Therefore, the East Ash Pond does not reduce the compensatory storage of the base flood.

Based on the analysis included herein the existing Hennepin Power Plant East Ash Pond CCR surface impoundment complies with the requirements included in *35 I.A.C. 845.340(c)* (2021).

- The East Ash Pond does not restrict the flow of the base flood because it was included in the hydraulic modeling that defined the regulatory floodway, the area reserved to discharge the base flood.
- The East Ash Pond does not reduce the temporary water storage capacity of the 100-year floodplain because it was included in the hydraulic modeling that defined the special flood hazard area subject to inundation by the based flood or 1% annual chance flood.
- The East Ash Pond is not subject to carrying away of CCR by waters of the base flood because the top of embankment elevation for the CCR impoundment greater than the base flood elevation.

4.0 REFERENCES

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- USACE. (n.d.). Hydrologic Engineering Center. *Hydrologic Engineering Center's River Analysis System (HEC-RAS), Version 3.1.3*. Davis, California, United States. Retrieved from <https://www.hec.usace.army.mil/software/hec-ras/download.aspx>
- USACE Rock Island District. (2005, September 30). FEMA Engineering Library. *Illinois River Mile 80 - 286 Flood Computation*.

APPENDIX A – EXCERPT FROM 35 I.A.C. 845.340(C)

- b) The owner or operator of the CCR surface impoundment must obtain a certification from a qualified professional engineer stating that the demonstration meets the requirements of subsection (a).
- c) The owner or operator of an existing CCR surface impoundment must complete the demonstration required by subsection (a) and submit the completed demonstration, along with the qualified professional engineer's certification to the Agency with the facility's initial operating permit application.
- d) The owner or operator of a new CCR surface impoundment or a lateral expansion of a CCR surface impoundment must submit plans and specifications in a construction permit application that demonstrate the CCR surface impoundment will be constructed under subsection (a). Upon completion of construction, the owner or operator must obtain a certification from a qualified professional engineer that the CCR surface impoundment or lateral expansion was constructed in accordance with the requirements of subsection (a) and submit the certification to the Agency in the facility's initial operating permit application.

Section 845.340 Unstable Areas and Floodplains

- a) An existing or new CCR surface impoundment, or any lateral expansion of a CCR surface impoundment, must not be located in an unstable area unless the owner or operator demonstrates that recognized and generally accepted engineering practices have been incorporated into the design of the CCR surface impoundment to ensure that the integrity of the structural components of the CCR surface impoundment will not be disrupted.
- b) The owner or operator must consider all the following factors, at a minimum, when determining whether an area is unstable:
 - 1) On-site or local soil conditions, including ~~but not limited to~~ liquefaction, that may result in significant differential settling;
 - 2) On-site or local geologic or geomorphologic features; and
 - 3) On-site or local human-made features or events (both surface and subsurface).
- c) An existing or new CCR surface impoundment, or any lateral expansion of a CCR surface impoundment, must not be located in a floodplain unless the owner or operator demonstrates that recognized and generally accepted engineering practices have been incorporated into the design of the CCR surface impoundment to ensure that the CCR surface impoundment will not restrict the flow of the base flood, reduce the temporary water storage capacity of a floodplain, or result in washout of CCR, so as to pose a hazard to human life, wildlife, or land or water resources. For this subsection (c):

- 1) Base flood means a flood that has a 1 percent or greater chance of recurring in any year or a flood of a magnitude equaled or exceeded once in 100 years on average within the time of historical river level records.
 - 2) Floodplain means the lowland and relatively flat areas adjoining inland and coastal waters, including flood-prone areas of offshore islands, which are inundated by the base flood.
 - 3) Washout means the carrying away of CCR by waters of the base flood.
- de) The owner or operator of the CCR surface impoundment must obtain a certification from a qualified professional engineer stating that the demonstration meets the requirements of subsections (a) and (c).
- ed) The owner or operator of an existing CCR surface impoundment must complete the demonstration required by subsections (a) and (c) of this Section and submit the completed demonstration, along with a qualified professional engineer's certification, to the Agency with the facility's initial operating permit application.
- fe) The owner or operator of a new CCR surface impoundment, or a lateral expansion of a CCR surface impoundment, must submit plans and specifications in a construction permit application that demonstrate the CCR surface impoundment will be constructed under subsections (a) and (c). Upon completion of construction, the owner or operator must obtain a certification from a qualified professional engineer that the CCR surface impoundment or lateral expansion was constructed in accordance with the requirements in subsections (a) and (c) and submit the certification to the Agency in the facility's initial operating permit application.

Section 845.350 Failure to Meet Location Standards

- a) An owner or operator of an existing CCR surface impoundment who fails to demonstrate compliance with the requirements of this Subpart is subject to the requirements of Section 845.700.
- b) An owner or operator of a new CCR surface impoundment, or any lateral expansion of a CCR surface impoundment, who fails to make the demonstration showing compliance with the requirements of this Subpart is prohibited from placing CCR in the CCR surface impoundment.

SUBPART D: DESIGN CRITERIA

Section 845.400 Liner Design Criteria for Existing CCR Surface Impoundments

APPENDIX B – FEMA FLOOD INSURANCE RATE MAPS

NOTES TO USERS

This map is for use in administering the National Flood Insurance Program. It does not necessarily identify all areas subject to flooding, particularly from local drainage sources of small size. The community map repository should be consulted for possible updated or additional flood hazard information.

To obtain more detailed information in areas where **Base Flood Elevations (BFEs)** and/or **floodways** have been determined, users are encouraged to consult the Flood Profiles and Floodway Data and/or Summary of Stillwater Elevations tables contained within the Flood Insurance Study (FIS) report that accompanies this FIRM. Users should be aware that BFEs shown on the FIRM represent rounded whole-foot elevations. These BFEs are intended for flood insurance rating purposes only and should not be used as the sole source of flood elevation information. Accordingly, flood elevation data presented in the FIS report should be utilized in conjunction with the FIRM for purposes of construction and/or flood plain management.

Coastal Base Flood Elevations shown on this map apply only landward of 0.0' North American Vertical Datum of 1988 (NAVD 88). Users of this FIRM should be aware that coastal flood elevations are also provided in the Summary of Stillwater Elevations table in the Flood Insurance Study report for this jurisdiction. Elevations shown in the Summary of Stillwater Elevations table should be used for construction and/or flood plain management purposes when they are higher than the elevations shown on this FIRM.

Boundaries of the **floodways** were computed at cross sections and interpolated between cross sections. The floodways were based on hydraulic considerations with regard to requirements of the National Flood Insurance Program. Floodway widths and other pertinent floodway data are provided in the Flood Insurance Study report for this jurisdiction.

In the State of Illinois, any portion of a stream or watercourse that lies within the **floodway fringe** of a studied (AE) stream may have a state regulated floodway. The FIRM may not depict these state regulated floodways.

Floodways restricted by anthropogenic features such as bridges and culverts are drawn to reflect natural conditions and may not agree with the model computed widths listed in the Floodway Data table in the Flood Insurance Study report.

Multiple **topographic sources** may have been used in the delineation of Special Flood Hazard Areas. See Flood Insurance Study report for details on source resolution and geographic extent.

Certain areas not in Special Flood Hazard Areas may be protected by **flood control structures**. Refer to Section 2.4 "Flood Protection Measures" of the Flood Insurance Study report for information on flood control structures for this jurisdiction.

The **projection** used in the preparation of this map was Universal Transverse Mercator (UTM) zone 16. The **horizontal datum** was NAD 83, GRS80 spheroid. Differences in datum, spheroid, projection or UTM zones used in the production of FIRMs for adjacent jurisdictions may result in slight positional differences in map features across jurisdiction boundaries. These differences do not affect the accuracy of this FIRM.

Flood elevations on this map are referenced to the North American Vertical Datum of 1988. These flood elevations must be compared to structure and ground elevations referenced to the same **vertical datum**. For information regarding conversion between the National Geodetic Vertical Datum of 1929 and the North American Vertical Datum of 1988, visit the National Geodetic Survey website at www.ngs.noaa.gov or contact the National Geodetic Survey at the following address:

NGS Information Services, NOAA, NNGS12
National Geodetic Survey SSMC-3, #9202
1315 East-West Highway
Silver Spring, Maryland 20910-3282
(301) 713-3242

To obtain current elevation, description, and/or location for **bench marks** shown on this map, please contact the Information Services Branch of the National Geodetic Survey at (301) 713-3242, or visit its website at www.ngs.noaa.gov.

Base map information shown on this FIRM was provided in digital format by the United States Geological Survey. Digital orthoimagery with a spatial resolution of 0.5 meter ground sample distance were photogrammetrically compiled from aerial photography acquired during the leaf-off period of spring 2005.

This map reflects more detailed and up-to-date **stream channel configurations** than those shown on the previous FIRM for this jurisdiction. The Special Flood Hazard Areas and floodways that were transferred from the previous FIRM may have been adjusted to conform to these new stream channel configurations. As a result, the Flood Profiles and Floodway Data tables in the Flood Insurance Study report (which contains authoritative hydraulic data) may reflect stream channel distances that differ from what is shown on this map.

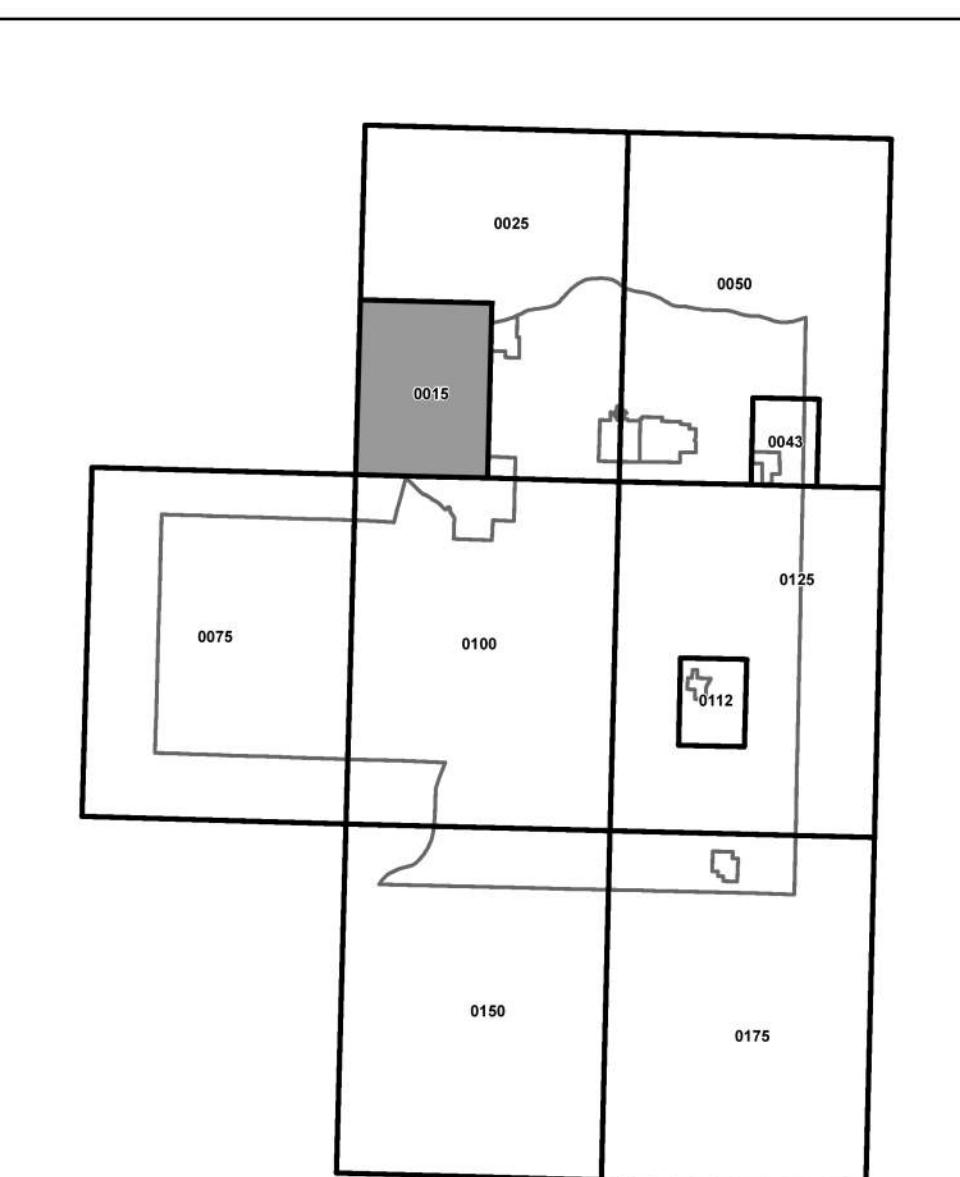
Corporate limits shown on this map are based on the best data available at the time of publication. Because changes due to annexations or de-annexations may have occurred after this map was published, map users should contact appropriate community officials to verify current corporate limit locations.

Please refer to the separately printed **Map Index** for an overview map of the county showing the layout of map panels; community map repository addresses; and a Listing of Communities table containing National Flood Insurance Program dates for each community as well as a listing of the panels on which each community is located.

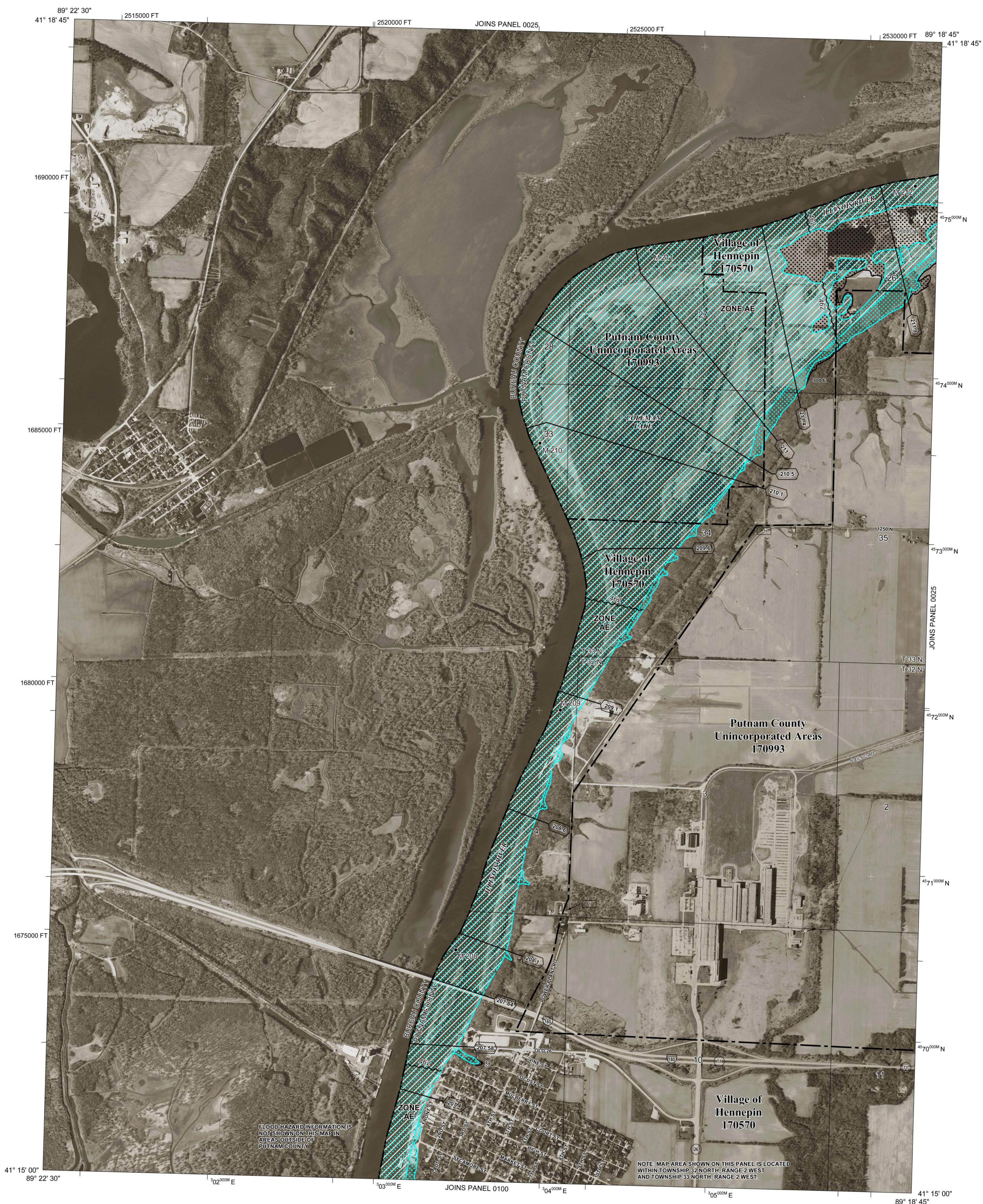
For information on available products associated with this FIRM visit the Map Service Center (MSC) website at <http://msc.fema.gov>. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of this map. Many of these products can be ordered or obtained directly from the MSC website.

If you have **questions about this map**, how to order products or the National Flood Insurance Program in general, please call the **FEMA Map Information eXchange (FMIX)** at 1-877-FEMA-MAP (1-877-336-2627) or visit the FEMA website at <http://www.fema.gov/business/fmix>.

PANEL INDEX



Panel Not Printed



LEGEND

SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

The 1% annual chance flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

- ZONE A** No Base Flood Elevations determined.
- ZONE AE** Base Flood Elevations determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
- ZONE AO** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
- ZONE AR** Special Flood Hazard Areas formerly protected from the 1% annual chance flood by a flood control system that was subsequently decommissioned. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.
- ZONE A99** Area to be protected from 1% annual chance flood by a Federal flood protection system under construction; no Base Flood Elevations determined.
- ZONE V** Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations determined.
- ZONE VE** Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined.

FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

OTHER FLOOD AREAS

ZONE X Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

OTHER AREAS

ZONE X Areas determined to be outside the 0.2% annual chance floodplain.

ZONE D Areas in which flood hazards are undetermined, but possible.

COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS

OTHERWISE PROTECTED AREAS (OPAs)

CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas.

1% annual chance floodplain boundary

0.2% annual chance floodplain boundary

Floodway boundary

Zone D boundary

CBRS and OPA boundary

Boundary dividing Special Flood Hazard Areas of different Base Flood Elevations, flood depths or flood velocities.

Base Flood Elevation line and value; elevation in feet*

Base Flood Elevation value where uniform within zone; elevation in feet*

*Referenced to the North American Vertical Datum of 1988

A Cross section line

23 Transect line

45° 02' 08", 93° 02' 12" Geographic coordinates referenced to the North American Datum of 1983 (NAD 83)

4890000N 1000-meter Universal Transverse Mercator grid values, zone 16

1565000 FT 5000-foot grid tick; Illinois State Plane West Coordinate System, 3801 zone (FIPSZONE 1202) Transverse Mercator

DXSS10x Bench mark (see explanation in Notes to Users section of this FIRM panel)

M1.5 River Mile

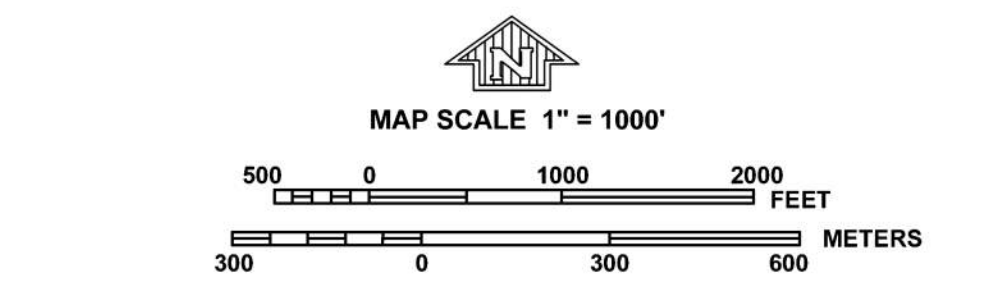
MAP REPOSITORIES Refer to Map Repositories list on Map Index

EFFECTIVE DATE OF COUNTYWIDE FLOOD INSURANCE RATE MAP FEBRUARY 4, 2011

EFFECTIVE DATE(S) OF REVISION(S) TO THIS PANEL

For community map revision history prior to countywide mapping, refer to the Community Map History table located in the Flood Insurance Study report for this jurisdiction.

To determine if flood insurance is available in this community, contact your insurance agent or call the National Flood Insurance Program at 1-800-638-6620.



NATIONAL FLOOD INSURANCE PROGRAM

PANEL 0015E

FIRM

FLOOD INSURANCE RATE MAP

PUTNAM COUNTY, ILLINOIS

AND INCORPORATED AREAS

PANEL 15 OF 175

(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
HENNEPIN, VILLAGE OF	170570	0015	E
PUTNAM COUNTY	170993	0015	E

Notice to User: The Map Number shown below should be used when placing map orders. The Community Number shown above should be used on insurance applications for the subject community.

MAP NUMBER
17155C0015E

EFFECTIVE DATE
FEBRUARY 4, 2011

Federal Emergency Management Agency

NOTES TO USERS

This map is for use in administering the National Flood Insurance Program. It does not necessarily identify all areas subject to flooding, particularly from local drainage sources of small size. The community map repository should be consulted for possible updated or additional flood hazard information.

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Floodways restricted by anthropogenic features such as bridges and culverts are drawn to reflect natural conditions and may not agree with the model computed widths listed in the Floodway Data table in the Flood Insurance Study report.

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Silver Spring, Maryland 20910-3282
(301) 713-3242

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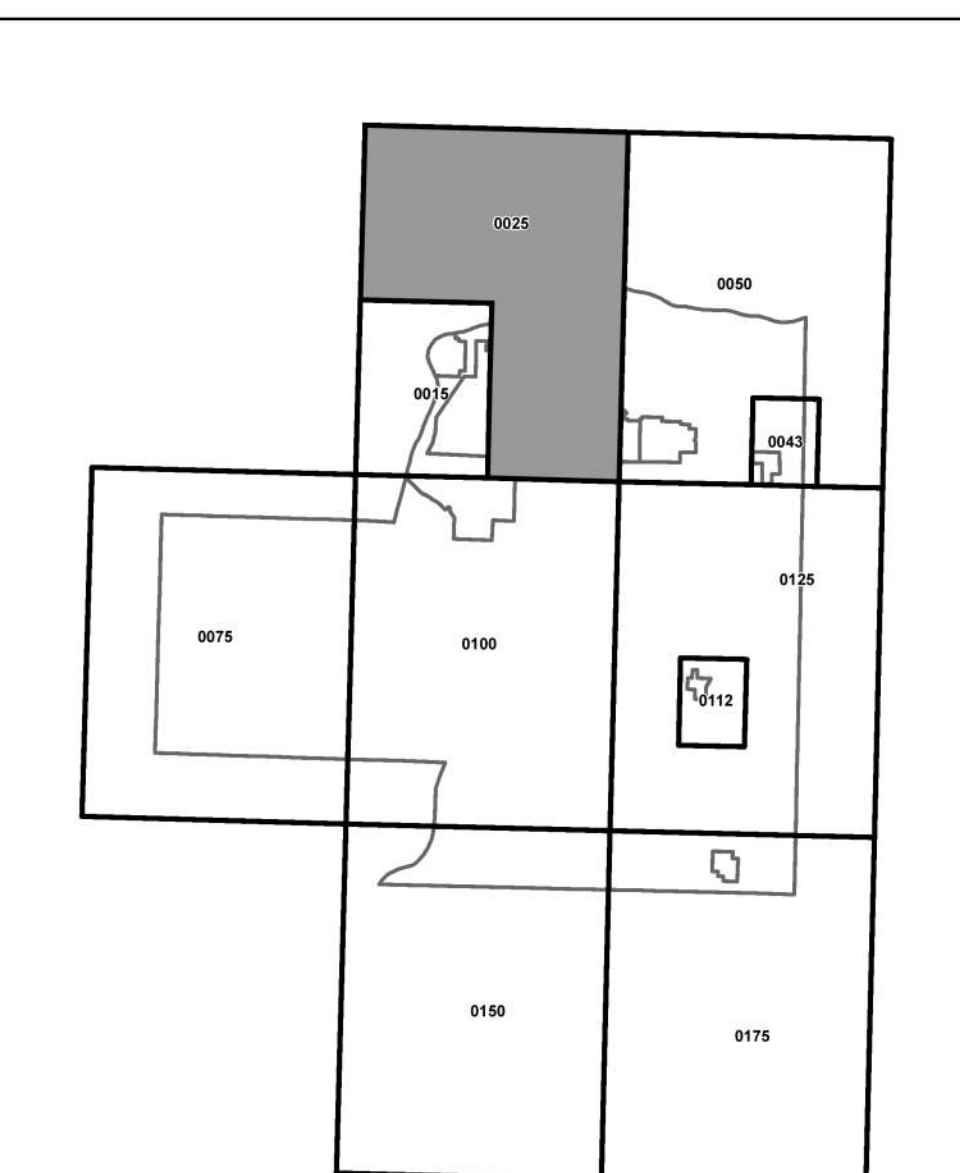
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PANEL INDEX



THIS AREA SHOWN AT A SCALE OF
1" = 1000' ON MAP NUMBER 17155C0015

LEGEND

SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

- ZONE A** No Base Flood Elevations determined.
- ZONE AE** Base Flood Elevations determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
- ZONE AO** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
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FLOODWAY AREAS IN ZONE AE

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OTHER FLOOD AREAS

ZONE X Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

OTHER AREAS

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ZONE D Areas in which flood hazards are undetermined, but possible.

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OTHERWISE PROTECTED AREAS (OPAs)

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1% annual chance floodplain boundary

0.2% annual chance floodplain boundary

Floodway boundary

Zone D boundary

CBRS and OPA boundary

Boundary dividing Special Flood Hazard Areas of different Base Flood Elevations, flood depths or flood velocities.

Base Flood Elevation line and value; elevation in feet*

Base Flood Elevation value where uniform within zone; elevation in feet*

(EL 987)

*Referenced to the North American Vertical Datum of 1988

A Cross section line

23 Transect line

45° 02' 08", 93° 02' 12" Geographic coordinates referenced to the North American Datum of 1983 (NAD 83)

48° 00' 00" N 1000-meter Universal Transverse Mercator grid values, zone 16

15850000 FT 5000-foot grid tick; Illinois State Plane West Coordinate System, 3801 zone (FIPS/ZONE 1202) Transverse Mercator

DXSS10x Bench mark (see explanation in Notes to Users section of this FIRM panel)

M1.5 River Mile

MAP REPOSITORIES Refer to Map Repositories list on Map Index

EFFECTIVE DATE OF COUNTY-WIDE FLOOD INSURANCE RATE MAP FEBRUARY 4, 2011

EFFECTIVE DATE(S) OF REVISION(S) TO THIS PANEL

For community map revision history prior to countywide mapping, refer to the Community Map History table located in the Flood Insurance Study report for this jurisdiction.

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MAP SCALE 1" = 2000'

1000 0 2000 4000 FEET

600 0 600 1200 METERS

NATIONAL FLOOD INSURANCE PROGRAM

PANEL 0025E

FIRM
FLOOD INSURANCE RATE MAP
PUTNAM COUNTY, ILLINOIS
AND INCORPORATED AREAS

PANEL 25 OF 175
(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
HENNEPIN VILLAGE OF	170570	0025	E
MARK VILLAGE OF	170572	0025	E
PUTNAM COUNTY	170993	0025	E

Notice to User: The Map Number shown below should be used when placing map orders. The Community Number shown above should be used on insurance applications for the subject community.

MAP NUMBER
17155C0025E

EFFECTIVE DATE
FEBRUARY 4, 2011

Federal Emergency Management Agency

**APPENDIX C – TECHNICAL ASSESSMENT OF RIVER AND DAM SAFETY
IMPACTS FOR THE CLOSURE OF CCR PONDS**

Additional Documentation

Riverine Structures Form

- Section D.4 – Closure of the Old West Ash Pond (OWAP) has been approved by the Illinois Department of Natural Resources Office of Water Resources under permit No. DS2021007 (see attached). The dam has been assigned a hazard classification of Class III (Low Hazard). The OWAP was closed through the installation of geomembrane in addition to fill within the pond. Ponded surface water was removed from the OWAP. The geomembrane cover consists of a 40-mil textured LLDPE and soil cover system. The cover system was constructed above the pre-closure top of dam eliminating the pre-closure impounding capacity of the structure. The post-closure cover system freely drains to the Illinois river and the structure will no longer be intended to impound water. The attached permit No. DS2021007 includes the related drawings, specifications and supporting design information for the OWAP closure.
- Section D.7 – Old West Ash Pond is a Class III: Low Hazard Dam. Per IDNR Part 3702 Rule 3702.40 the dam does not require a formal Operation & Maintenance Plan.

Pertinent excerpts from the Technical Assessment in support of permit No. DS2021007 are attached.

Draft Notice:

The Putnam County Zoning and Floodplain Office, in accordance with National Flood Insurance Program regulation 65.7(b)(1), hereby gives notice of Putnam County's intent to revise the flood hazard information, generally located on the south bank of the Illinois River along the Hennepin Power Station Old West Ash Pond (OWAP). Specifically, the flood hazard information will be revised over the Old West Ash Pond (OWAP). The flood hazard revisions are being proposed as part of a Letter of Map Revision (LOMR) Case No. xx-xx-xxxxx to incorporate the closure of the Hennepin Power Station OWAP.

1. The floodway and floodplain over OWAP will be revised to remove an area about 1800-ft by 1000-ft.
2. Base Flood Elevations (BFEs) will not change.

Maps and detailed analysis of the revision can be reviewed at the Putnam County Clerk Office at 120 N. Fourth Street, Hennepin IL. Interested persons may call Jim Burger, Zoning and Floodplain Office - Enforcement Officer at (972) 624-3109 or pczoning@co.putnam.il. for additional information from Monday – Friday : 9:00 am - 4:00pm.




Figure TBD.

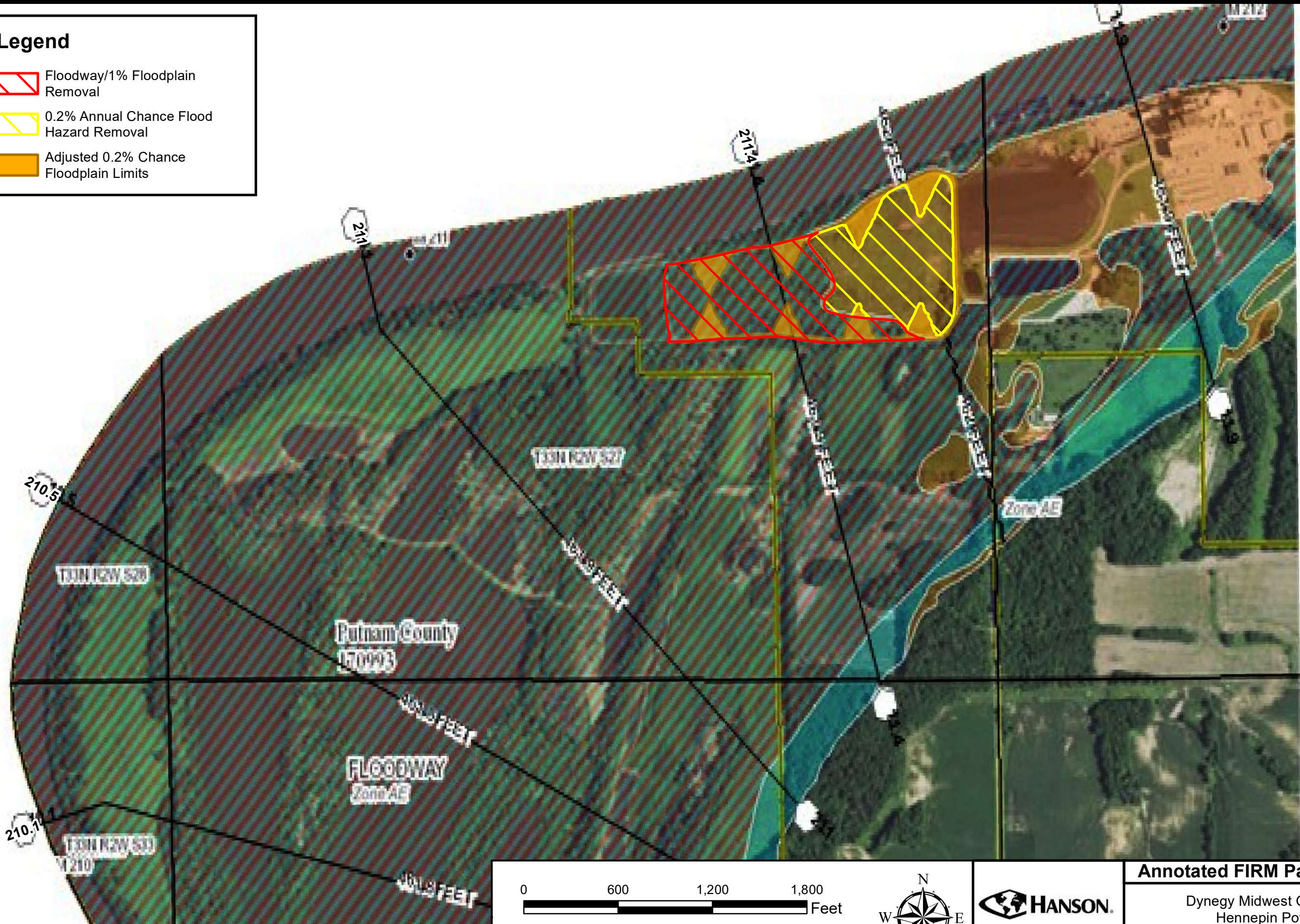
SAMPLE PUBLIC NOTIFICATION FOR PROPOSED FLOOD HAZARD REVISIONS

(to be used by community when placing a notice in a newspaper)

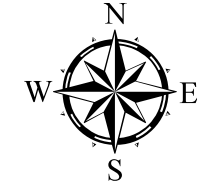
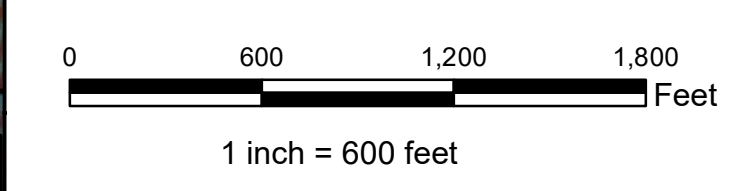
Please note that a newspaper notice may not be used to fulfill the notification requirement of NFIP Regulation 65.12.

Legend

-  Floodway/1% Floodplain Removal
-  0.2% Annual Chance Flood Hazard Removal
-  Adjusted 0.2% Chance Floodplain Limits



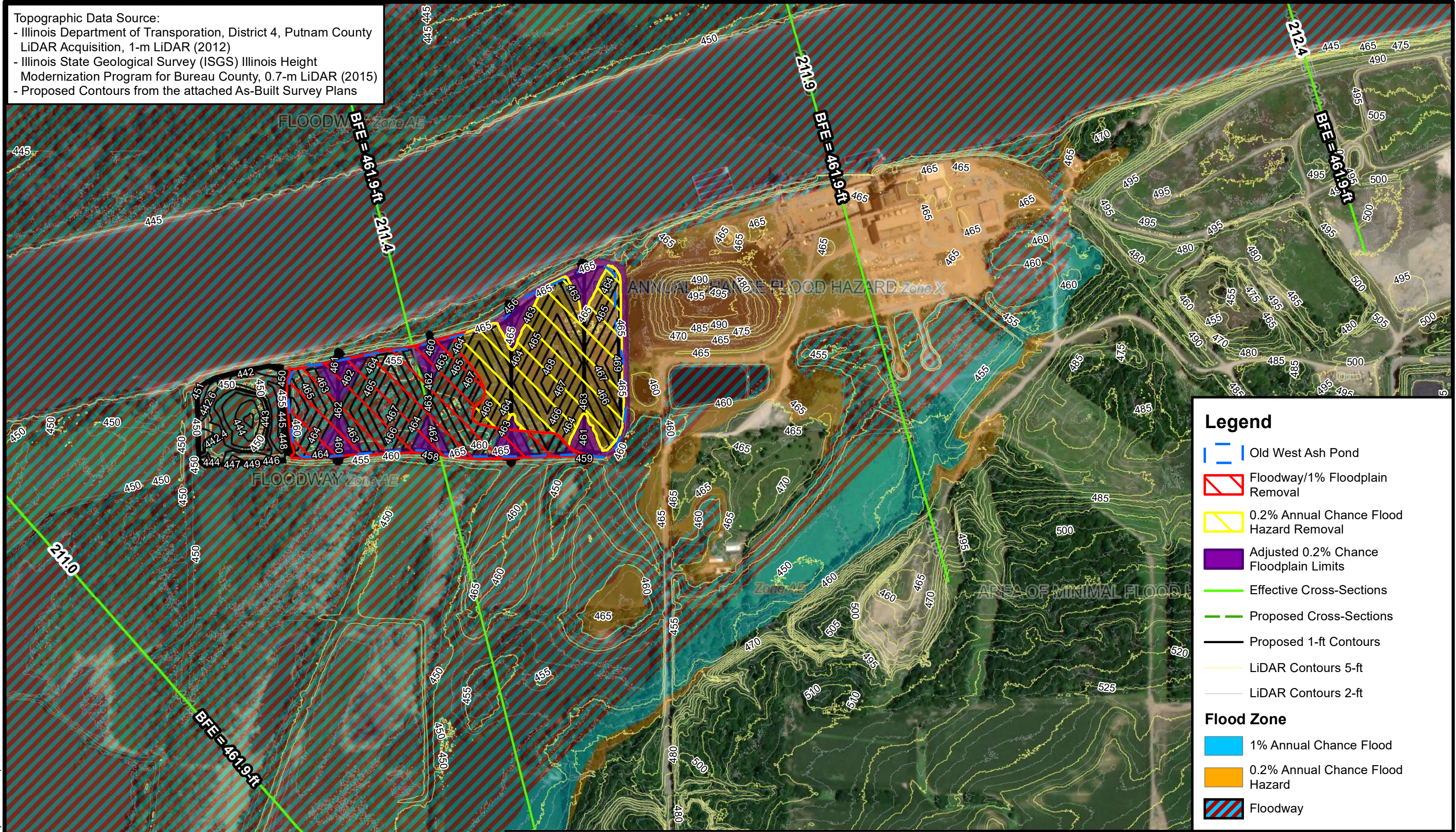
Vertical Datum: NAVD88
Coordinate System: NAD 1983 NSRS2007 StatePlane Illinois West FIPS 1202 Ft US



Annotated FIRM Panel 17155C0015E
Dynergy Midwest Generation, LLC
Hennepin Power Station
Putnam County, Illinois
Job Number 19E0096B

I:\19jobs\19E0096B\CAD\GIS\Projects\MF2_FIRM_0015.mxd

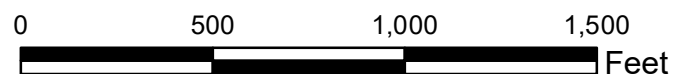
Topographic Data Source:
 - Illinois Department of Transportation, District 4, Putnam County
 LiDAR Acquisition, 1-m LiDAR (2012)
 - Illinois State Geological Survey (ISGS) Illinois Height
 Modernization Program for Bureau County, 0.7-m LiDAR (2015)
 - Proposed Contours from the attached As-Built Survey Plans



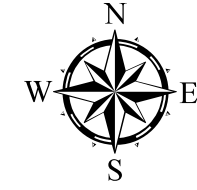
Legend

- Old West Ash Pond
 - Floodway/1% Floodplain Removal
 - 0.2% Annual Chance Flood Hazard Removal
 - Adjusted 0.2% Chance Floodplain Limits
 - Effective Cross-Sections
 - Proposed Cross-Sections
 - Proposed 1-ft Contours
 - LiDAR Contours 5-ft
 - LiDAR Contours 2-ft
- Flood Zone**
- 1% Annual Chance Flood
 - 0.2% Annual Chance Flood Hazard
 - Floodway

Vertical Datum: NAVD88
 Coordinate System: NAD 1983 NSRS2007 StatePlane Illinois West FIPS 1202 Ft US



1 inch = 500 feet



Topographic Work Map

Dynergy Midwest Generation, LLC
 Hennepin Power Station
 Putnam County, Illinois

Job Number 19E0096B

I:\19\jobs\19E0096B\CAD\GIS\Projects\MTF-2 Floodplain Removal.mxd



PERMIT NO. DS2021007
DATE: February 11, 2021

State of Illinois
Department of Natural Resources, Office of Water Resources

Permission is hereby granted to:

Dynegy Midwest Generation, LLC
1500 Eastport Plaza Drive
Collinsville, Illinois 62234

To modify, operate and maintain the West Ash Pond Dam, an intermediate size Class II dam located in Section 27, Township 33 North, Range 2 West of the 3rd Principal Meridian in Putnam County, in accordance with an application dated October 30, 2020. The plans and specifications are entitled:

HENNIPEN POWER STATION
PERMIT DRAWINGS FOR THE CLOSURE OF THE
OLD WEST ASH POND AND OLD WEST POLISHING POND
Sheets G100, G110, C100, C200, C210, C220, C300, C310, C320, C330, C400, C410 and C420
Dated May 1, 2020
Technical Specifications
Sections 01 11 01, 01 42 13, 01 43 00, 01 57 19 01 78 00: Division 02 and Division 31
Dated January 28, 2019

The construction authorization covers removal of the surface impounding capacity, shaping of the embankment slopes and general site drainage work. The construction activities were previously completed.

Examined and Recommended:

Approval Recommended:

Paul Mauer, Jr., P.E.
State Dam Safety Engineer

Loren A. Wobig, Director
Office of Water Resources

Approved:

Colleen Callahan, Director
Department of Natural Resources

PERMIT NO. DS2021007

THIS PERMIT IS SUBJECT TO THE FOLLOWING CONDITIONS:

- 1) This permit is granted in accordance with the Rivers, Lakes and Streams Act [615 ILCS 5].
- 2) This permit does not convey title to the permittee or recognize title of the permittee to any submerged or other lands, and furthermore, does not convey, lease or provide any right or rights of occupancy or use of the public or private property on which the activity or any part thereof will be located, or otherwise grant to the permittee any right or interest in or to the property, whether the property is owned or possessed by the State of Illinois or by any private or public party or parties.
- 3) This permit does not release the permittee from liability for damage to persons or property resulting from the work covered by this permit, and does not authorize any injury to private property or invasion of private rights.
- 4) This permit does not relieve the permittee of the responsibility to obtain other federal, state or local authorizations required for the construction of the permitted activity; and if the permittee is required by law to obtain approval from any federal or other state agency to do the work, this permit is not effective until the federal and state approvals are obtained.
- 5) The permittee shall, at the permittee's own expense, remove all temporary piling, cofferdams, false work, and material incidental to the construction of the project, from the floodway, river, stream or lake in which the work is done. If the permittee fails to remove such structures or materials, the State may have removal made at the expense of the permittee. If the construction is on a public body of water and if future need for public navigation or other public interest of any character, by the State or federal government, necessitates changes in any part of the structure or structures, such changes shall be made by and at the expense of the permittee or the permittee's successors as required by the Department of Natural Resources or other properly constituted agency, within sixty (60) days from receipt of written notice of the necessity from the Department or other agency, unless a longer period of time is specifically authorized.
- 6) The execution and details of the work authorized shall be subject to the supervision and approval of the Department. Department personnel shall have the right of access to accomplish this purpose.
- 7) The permittee shall file with the Department a properly executed acceptance of all terms and conditions of the permit within sixty (60) days of receipt of the permit; however, starting work on the construction authorized will be considered full acceptance by the permittee of the terms and conditions of the permit.
- 8) The Department in issuing this permit has relied upon the statements and representations made by the permittee; if any substantive statement or representation made by the permittee is found to be false, the permit may be revoked at the option of the Department; and when a permit is revoked all rights of the permittee under the permit are voided.
- 9) If the project authorized by this permit is located in or along Lake Michigan or a meandered Lake, the permittee and the permittee's successors shall make no claim whatsoever to any interest in any accretions caused by the project.
- 10) In issuing this permit, the Department does not ensure the adequacy of the design or structural strength of the structure or improvement.
- 11) Noncompliance with the conditions of this permit will be considered grounds for revocation.
- 12) If the construction activity permitted is not completed on or before n/a , this permit shall cease and be null and void.

THIS PERMIT IS SUBJECT TO THE FOLLOWING SPECIAL CONDITIONS:

PERMIT ACCEPTANCE

This Acceptance must be signed and returned to the address below to validate this permit.

**ILLINOIS DEPARTMENT OF NATURAL RESOURCES
OFFICE OF WATER RESOURCES
One Natural Resources Way
Springfield, Illinois 62702-1271**

The undersigned permittee, personally, or if a corporation by its duly authorized officers, hereby accepts the permit bearing the above permit number subject to all conditions named therein, on this _____ day of _____, 20__.

By _____

By _____

If a corporation
affix seal here.

Date



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
www.dnr.illinois.gov

JB Pritzker, Governor
Colleen Callahan, Director

February 11, 2021

SUBJECT: Permit No. DS2021007
Modification, Operation and Maintenance
West Ash Pond Dam – IL00698
Putnam County

Dynegy Midwest Generation, LLC
Attn: Ms. Dianna Tickner
1500 Eastport Plaza Drive
Collinsville, IL 62234

Dear Ms. Tickner:

Enclosed is Illinois Department of Natural Resources, Office of Water Resources Permit No. DS2021007, authorizing the modification, operation and maintenance of the West Ash Pond Dam at Hennepin Power Station. This permit authorizes the removal of the surface impounding capacity, work on the embankment slopes and work on the drainage of the adjacent coal yard area. These items were previously completed and are approved on an after-the-fact basis. It also authorizes the future operation and maintenance of the structure.

The application included information related to several other aspects of the work. The result of our consideration of those items is as follows:

- Floodway delineation – the current FEMA maps indicate that the surface of the ash pond was in the floodway. The topographic information indicates that the top of the embankments has been above the BFE. This prevents the area which includes the top of the embankment and the interior of the impoundment from conveying flood flows of the BFE event. By definition, this area cannot be part of the floodway. The previous delineation appears to be in error. The Department supports the correction of the map by removing the areas above the BFE from the floodplain.
- Application of the Part 3704 rules – The application documents show that the work occurred above the 50% duration elevation of the Illinois River. The construction requirements in the Part 3704 rules do not apply. The permittee is reminded that the public's rights related to the public waters follow the water. Public use of the public waters shall not be impacted without authorization from the Department.

- Application of Part 3702 Rules – The application includes a partial analysis of the potential for the material within the structure to meet the criteria for deregulation of the structure. The investigation did not consider all parts of the impoundment and indicated that during the design seismic event some material may be subject to liquefaction. The result is that the structure still meets the definition of a dam and remains a regulated dam. Based on the analysis, the classification of the dam is reduced to Class III. The periodic inspection requirement is modified to require inspections only once every 5 years.
- Operation and Maintenance Plan – this authorization incorporates the Operation and Maintenance Plan for the East Ash Pond Dam, as applicable to the West Ash Pond Dam.

This permit does not supersede any other federal, state or local authorizations that may be required for the project.

If any changes of the permitted work are found necessary, revised plans should be submitted promptly to this office for review and approval.

Please feel free to contact me at 217/782-4427 if you have any questions concerning this authorization.

Sincerely,

Paul Mauer, Jr., P.E.
State Dam Safety Engineer

PM:cjp

Enclosure

cc: Mr. Tony Comerio, Hanson Professional Services (e-mail)

**SPECIAL CONDITIONS
DYNEGY MIDWEST GENERATION
HENNEPIN WEST ASH POND DAM – IL00698
DS2021007**

- a. There shall be no change from the plans submitted and hereby approved unless the proposed change in plans shall first have been submitted to and approved, in writing, by the State of Illinois acting by and through its Department of Natural Resources, Office of Water Resources.**
- b. The Permittee shall operate, inspect, and maintain the dam and appurtenances in accordance with the approved plans and in accordance with the latest edition of the “Rules for Construction and Maintenance of Dams” adopted by the Department of Natural Resources. If the approved operation, inspection and maintenance plans are not complied with by the Permittee, this permit shall cease and be null and void.**
- c. The Permittee grants the Department of Natural Resources, Office of Water Resources, the right of access to inspect the dam site and immediate vicinity beginning from the date of this permit, for the life of the dam and appurtenances.**
- d. The Permittee authorizes the Department of Natural Resources, Office of Water Resources, in the event that the dam is found to be in immediate danger of failure, to enter upon the dam property, if necessary, to prevent or alleviate any dam breach damage. The Permittee agrees to compensate the Office of Water Resources for costs reasonably incurred by such emergency action.**
- e. The Permittee shall have the dam and appurtenances inspected once every 5 years and shall have the engineer prepare and submit an inspection report on forms provided by the Department of Natural Resources to the Department of Natural Resources, Office of Water Resources. In the intervening years the Permittee shall complete and submit the Owner’s Maintenance Statement. The first inspection report will be due in 2021 and shall serve as the baseline condition for the modified structure for future inspections.**

Date: 2/22/2021

Time: 8:30am

Person Called: Chris Hanstad (ISWS)

Person Calling: Garrett Litteken (Hanson)

Project No.: 19E0096B

Project Name: Closure of Old West Ash Pond at Hennepin Power Station, Hennepin, Illinois

Subject: FEMA MT-2 Submittal Coordination

Copy to File, Others: File

The following expresses our understanding of the items discussed. Please respond in writing within five (5) days of receipt if any changes are required.

On Monday, February 22, 2021, Garrett Litteken (Hanson) called Chris Hanstad (ISWS) to discuss submittal requirements for a MT-2 application in support of a Letter of Map Revision (LOMR) for the removal of the Hennepin Power Station Old West Ash Pond (OWAP) from the 1% annual chance flood hazard based on fill and a floodway mapping error. The primary topic of discussion was the requisite MT-2 forms required for approval of the map change.

Chris Hanstad (ISWS) requested the following information for the MT-2 application:

- The Riverine Structures form should be provided in support of removing the OWAP based on fill.
- Based on preliminary information provided during the call and IDNR OWR permit DS2021007, Chris concurred that the area within the OWAP is improperly mapped as floodway.
 - The Riverine Hydrology and Hydraulics form should be included to document the request to modify the floodway based on a mapping error.
 - Two hydraulic models were used to develop flood hazard information in the subject reach.
 - A UNET model was used to develop the BFE
 - The USACE HEC-RAS Unsteady model was used to develop floodway limits.
 - The unsteady HEC-RAS model does not produce water surface elevations identical to the UNET model.
 - The USACE floodway model should be provided with the conveyance and storage to the OWAP blocked.
 - Effective Cross-Section 211.4 crosses the OWAP. Additional Cross-Sections are not required
 - Garrett noted that changes in water surface resulting from removal of the area within the OWAP are negligible.
 - Chris will make an internal determination if the model should be provided to FEMA
 - Inclusion of the hydraulic model is primarily for administrative purposes and should not impact receipt of a Letter of Map Revision for the OWAP.

JOINT APPLICATION FORM FOR ILLINOIS

ITEMS 1 AND 2 FOR AGENCY USE

1. Application Number	2. Date Received
-----------------------	------------------

3. and 4. (SEE SPECIAL INSTRUCTIONS) NAME, MAILING ADDRESS AND TELEPHONE NUMBERS

3a. Applicant's Name: Dynegy Midwest Generation, LLC Company Name (if any): Dynegy Midwest Generation, LLC Address: 1500 Eastport Plaza Drive Collinsville, IL 62234 Email Address: dianna.tickner@vistracorp.com	3b. Co-Applicant/Property Owner Name (if needed or if different from applicant): Company Name (if any): Address: Email Address:	4. Authorized Agent (an agent is not required): Company Name (If any): Address: Email Address:
Applicant's Phone Nos. w/area code Business: 618-381-3124 Residence: Cell: Fax:	Applicant's Phone Nos. w/area code Business: Residence: Cell: Fax:	Agent's Phone Nos. w/area code Business: Residence: Cell: Fax:

STATEMENT OF AUTHORIZATION

I hereby authorize, _____ to act in my behalf as my agent in the processing of this application and to furnish, upon request, supplemental information in support of this permit application.

Applicant's Signature

Date

5. ADJOINING PROPERTY OWNERS (Upstream and Downstream of the water body and within Visual Reach of Project)

Name	Mailing Address	Phone No. w/area code
a. IDNR	1 Natural Resources Way, Springfield, IL 62702	
b. David Umikis ET AL	11183 E Power Plant Rd., Granville, IL 61326	
c.		
d.		

6. PROJECT TITLE:

Closure of the Old West Ash Pond and the Old West Polishing Pond

7. PROJECT LOCATION:

Hennepin Power Station					
LATITUDE: 41.30057 °N LONGITUDE: 89.32116 °W	UTM's Northing: 4574722.62 Easting: 305669.53				
STREET, ROAD, OR OTHER DESCRIPTIVE LOCATION 13498 E 800th St.	LEGAL DESCRIPT	QUARTER NE	SECTION 27	TOWNSHIP NO. 33N	RANGE 2W
<input type="checkbox"/> IN OR <input checked="" type="checkbox"/> NEAR CITY OF TOWN (check appropriate box) Municipality Name Hennepin	WATERWAY Illinois River				RIVER MILE (if applicable) 211.4
COUNTY Putnam County	STATE IL	ZIP CODE 61327			

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 IL Dep't of Natural Resources
 IL Environmental Protection Agency
 Applicant's Copy

8. PROJECT DESCRIPTION (Include all features):

Hanson Professional Services Inc. (Hanson) was retained by Dynegy Midwest Generation, LLC to perform a hydraulic study for closure of the Old West Ash Pond (OWAP) and Old West Polishing Pond (OWPP) resulting in floodplain fill above the left bank of the Illinois River near Hennepin, Illinois. Closure of the OWAP includes construction of a 40-mil textured LLDPE geomembrane cover above the existing grade which will result in fill within the Illinois River effective floodway. Permits are being applied for the Title 17 Illinois Administrative Code (IAC), Illinois Department of Natural Resources (IDNR) Part 3700 Construction in Floodways of Rivers, Lakes, and Streams, Part 3702 Construction and Maintenance of Dams, and Part 3704 Regulation of Public Waters, and Part 3708 Floodway Construction in support of the pond closures.

9. PURPOSE AND NEED OF PROJECT:

Dynegy Midwest Generation, LLC submitted Notices of Intent to close the OWAP and OWPP to the Illinois Environmental Protection Agency (IEPA) in accordance with 40 Code of Federal Regulations (CFR) Part 257, Subpart D, which is known as the United States Environmental Protection Agency (USEPA) Coal Combustion Residuals (CCR) Final Rule, or the CCR Rule.

COMPLETE THE FOLLOWING FOUR BLOCKS IF DREDGED AND/OR FILL MATERIAL IS TO BE DISCHARGED

10. REASON(S) FOR DISCHARGE:

11. TYPE(S) OF MATERIAL BEING DISCHARGED AND THE AMOUNT OF EACH TYPE IN CUBIC YARDS FOR WATERWAYS:

TYPE:

AMOUNT IN CUBIC YARDS:

12. SURFACE AREA IN ACRES OF WETLANDS OR OTHER WATERS FILLED (See Instructions)

13. DESCRIPTION OF AVOIDANCE, MINIMIZATION AND COMPENSATION (See instructions)

14. Date activity is proposed to commence

August 6, 2019

Date activity is expected to be completed

November 17, 2020

15. Is any portion of the activity for which authorization is sought now complete?

Yes

No

NOTE: If answer is "YES" give reasons in the Project Description and Remarks section. Indicate the existing work on drawings.

Month and Year the activity was completed

October 26, 2020

16. List all approvals or certification and denials received from other Federal, interstate, state, or local agencies for structures, construction, discharges or other activities described in this application.

Issuing Agency	Type of Approval	Identification No.	Date of Application	Date of Approval	Date of Denial
IEPA	CCR Closure		Dec 20, 2017	June 15, 2018	

17. CONSENT TO ENTER PROPERTY LISTED IN PART 7 ABOVE IS HEREBY GRANTED.

Yes

No

18. APPLICATION VERIFICATION (SEE SPECIAL INSTRUCTIONS)

Application is hereby made for the activities described herein. I certify that I am familiar with the information contained in the application, and that to the best of my knowledge and belief, such information is true, complete, and accurate. I further certify that I possess the authority to undertake the proposed activities.

Heannie Tucker

Signature of Applicant or Authorized Agent

10/30/2020

Date

Signature of Applicant or Authorized Agent

Date

Signature of Applicant or Authorized Agent

Date

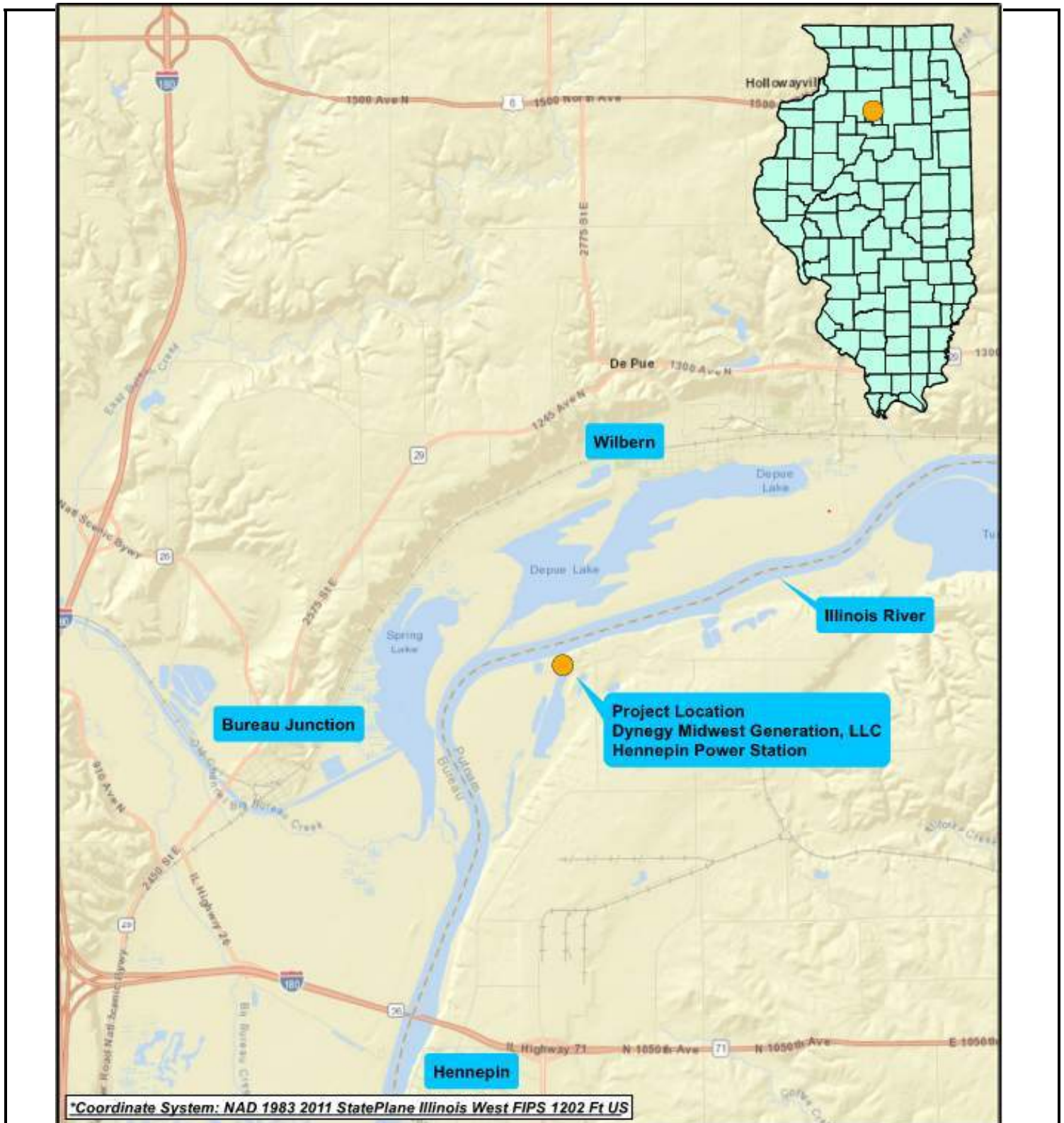
Corps of Engineers
Revised 2010

IL Dep't of Natural Resources

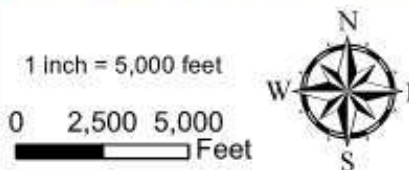
IL Environmental Protection
Agency

Applicant's Copy

SEE INSTRUCTIONS FOR ADDRESS



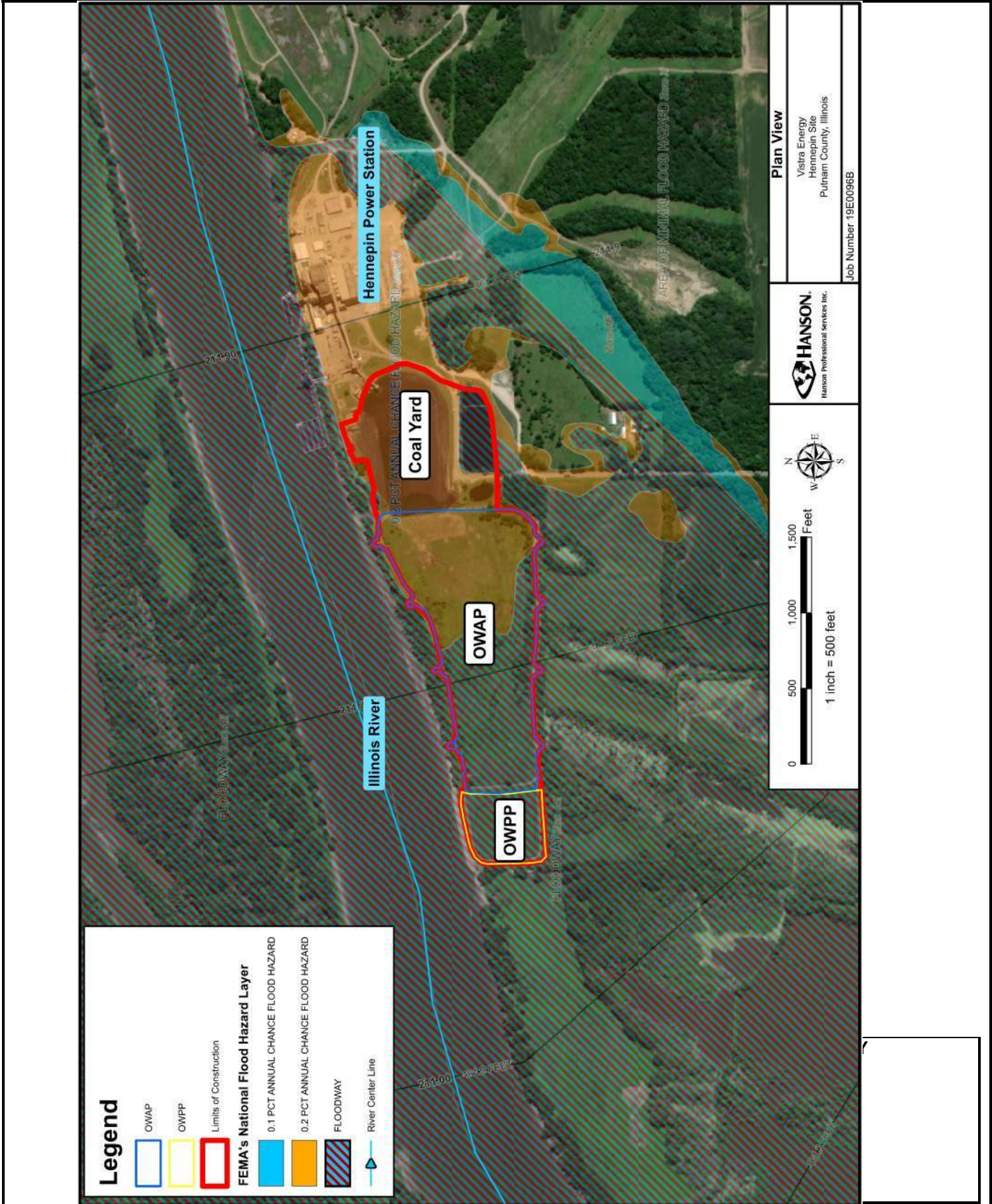
*Coordinate System: NAD 1983 2011 StatePlane Illinois West FIPS 1202 Ft US



Project Location Map
 Dynegy Midwest Generation, LLC
 Hennepin Power Station
 Putnam County, Illinois
 Job Number: 19E0096B

Revised 2010

- Corps of Engineers
- IL Dep't of Natural Resources
- IL Environmental Protection Agency
- Applicant's Copy



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IL Dep't of Natural Resources

IL Environmental Protection Agency

Applicant's Copy

Technical Assessment of River and Dam Safety Impacts for the Closure of CCR Ponds

**Hennepin Power Station
Putnam County, Illinois**

Prepared For: Dynegy Midwest Generation, LLC

Prepared By: Hanson Professional Services Inc.
October 28, 2020



Table of Contents

1. Introduction	1
2. Data Collection	1
<i>FEMA Data</i>	1
<i>LiDAR Data</i>	1
<i>Geosyntec Data</i>	2
3. Existing Site Description	2
4. Hydrology	3
5. Hydraulics	3
<i>Duplicate Effective Model</i>	3
<i>Corrected Effective/Existing Conditions Model</i>	4
<i>Proposed Conditions Model</i>	4
6. Dam Safety	6
<i>Pond Closure Procedures</i>	6
<i>Regulatory Criteria</i>	7
7. Compensatory Storage	7
8. Public Waters	8
9. Conclusion	8

Figures and Tables

Figures

Figure 1: Pre-Construction Pond and Coal Yard Locations	2
Figure 2: Topo and LiDAR Contours at Project Site	5

Tables

Table 1: Published Steady Discharges for Illinois River	3
Table 2: Cut and Fill Volumes	8

List of Appendices

<i>Appendix A – Site Location Map</i>	8
<i>Appendix B – FEMA Data</i>	
<i>Appendix C – Pre-Closure Site Plan</i>	
<i>Appendix D – Hydrology</i>	
<i>Appendix E – Hydraulic Cross-Section Maps</i>	
<i>Appendix F – Post-Closure Site Plans</i>	
<i>Appendix G – Model Output Summary</i>	
<i>Appendix H – IEPA State Permit</i>	
<i>Appendix I – Stormwater Pollution Prevention Plan</i>	
<i>Appendix J – Construction Quality Assurance Plan</i>	
<i>Appendix K – Geosyntec Geotechnical Calculations</i>	

CONFIDENTIALITY NOTICE: This document contains confidential information belonging to Hanson Professional Services Inc. (Hanson). This information is intended only for the use of Hanson employees and is not to be copied or distributed to others. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this document in error, please immediately notify Hanson to arrange for its return. Hanson Professional Services Inc., 1525 S. Sixth St., Springfield, IL 62703-2886. (217) 788-2450.

1. Introduction

Hanson Professional Services Inc. (Hanson) was retained by Dynegy Midwest Generation, LLC (Dynegy) to perform a technical assessment of the potential river and dam safety impacts from the closure of the Old West Ash Pond (OWAP) and Old West Polishing Pond (OWPP) at Hennepin Power Station, near Hennepin, Illinois. The impoundments are located 3 miles north of Hennepin, latitude 41°18'0.62"N and longitude 89°19'28.52"W, in the NE ¼ of Section 27, Township 33 North, Range 2 West of the 3rd Principal Meridian. A site location map is included in Appendix A. Hennepin Power Station is a retired coal fired power plant owned and operated by Dynegy who has pursued closure of the OWAP and OWPP ponds. Closure of the OWAP includes construction of a 40-mil textured LLDPE geomembrane and soil cover system above the coal combustion residuals (CCR) reservoir elevation and will result in fill within the Illinois River effective floodway. The OWPP was closed by removal of CCR residuals and the perimeter embankments degraded to allow free flow to the Illinois River. Closure of the OWPP and capping of the OWAP began on August 6, 2019 and will be substantially completed on November 17, 2020.

The results of this assessment, which included the development of a detailed Illinois River hydraulics model comparing pre-closure and post-closure conditions, show that the activities are permissible under Title 17 Illinois Administrative Code (IAC), Illinois Department of Natural Resources -Office of Water Resources (IDNR-OWR) Part 3700 Construction in Floodways of Rivers, Lakes, and Streams, Part 3702 Construction and Maintenance of Dams, and Part 3704 Regulation of Public Waters.

2. Data Collection

FEMA Data

The FEMA Flood Insurance Rate Maps (FIRM) for unincorporated areas of Putnam County, effective February 2011, indicate that the Dynegy Hennepin Site is located in a Zone AE with portions of the site in the defined regulatory floodway. This means the floodplain has been delineated based on detailed methods, which include Base Flood Elevations (BFE's) for the 100-yr event. The entirety of the OWPP and a portion of the OWAP are located within the defined regulatory floodway, as shown in Figure 1. A copy of the FEMA map is provided in Appendix B. A 2005 US Army Corp of Engineers (USACE) unsteady HEC-RAS model of the Illinois River is the effective FEMA model at the project location. This model was obtained from FEMA and was supplemented with site specific information associated with the pond closures to determine the hydraulic impacts of the post-closure fill in the Illinois River floodplain.

LiDAR Data

Light detection and ranging (LiDAR) data representing ground elevation for Putnam and Bureau Counties are available from the Illinois Height Modernization Program through IDOT via the Illinois Geospatial Data Clearinghouse. The data was recorded in 2012 and 2015, respectively, and was used in combination with the effective FEMA model to develop full floodplain cross-sections of Illinois River in the hydraulic model. All survey and elevation data, which was used to create the hydraulic models, was collected using the North American Vertical Datum of 1988 (NAVD88). All elevations listed in this report are NAVD88 unless otherwise noted.

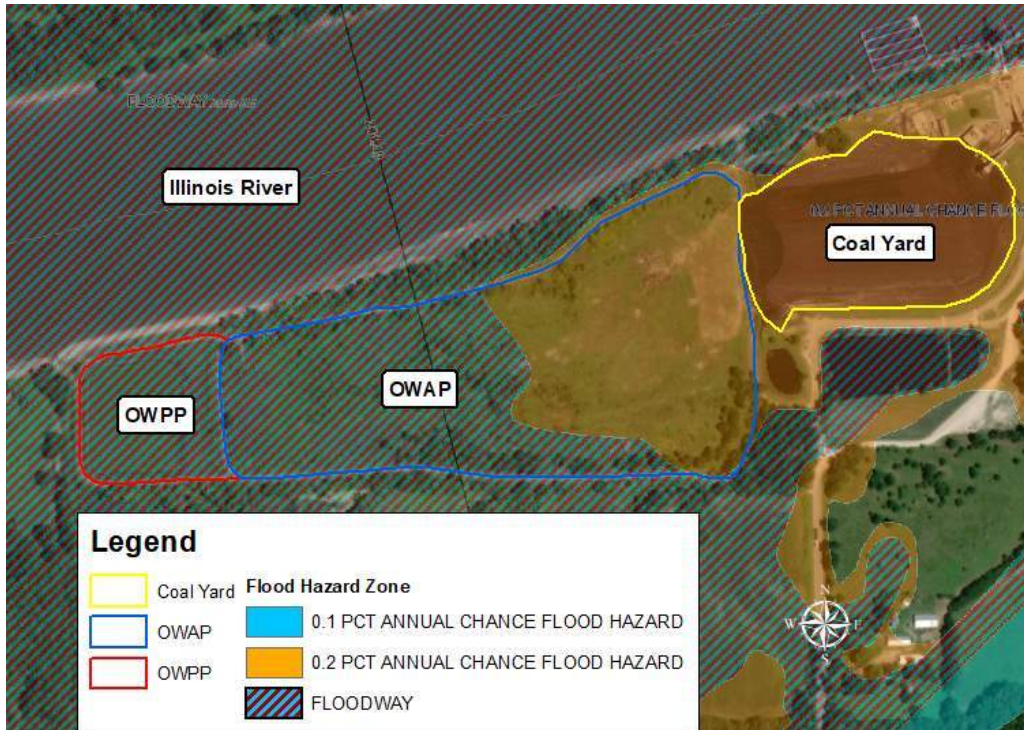


Figure 1: Pre-Construction Pond and Coal Yard Locations

Geosyntec Data

In June 2020, Hanson received data from Geosyntec including survey, As-Built plans and CAD files for the project site. This data was used to generate pre-closure and post-closure topographic surfaces for use with the hydraulic modeling effort. In September 2020, Hanson received Geosyntec’s Stormwater Pollution Prevention Plan (SWPPP) and the closure plan for the site which was submitted to and approved by the Illinois Environmental Protection Agency (IEPA). The pre-construction plans are provided along with the IEPA closure plan and SWPPP in Appendixes H and I, respectively. Also provided by Geosyntec is a Construction Quality Assurance (CQA) plan and Geotechnical Calculations for Closure Design included in Appendix J and K, respectively.

3. Pre-Closure Site Description

This site prior to closure includes two ponds, OWAP and OWPP, which have a surface area of approximately 29 acres and 5 acres, respectively. The ponds are located on the Illinois River’s left (South) bank and are shown in Figure 1. The OWPP perimeter berm and interior elevations are below the 100-yr BFE of 461.9-ft. The interior elevations of the OWAP are below the BFE. However, the perimeter berm is above the BFE and preventing the OWAP from actively conveying flow or providing floodplain storage. The pre-closure berms are not FEMA accredited levees. Therefore, per FEMA criteria, the area within the OWAP is mapped as floodplain. However, since the pre-closure OWAP berm is above the 100-yr floodplain, the area within OWAP does not have access to the Illinois River floodplain and would not provide conveyance for a river flooding event within the bermed area. While the area within the OWAP containment berm cannot convey flow, the area within OWAP was modeled as effective flow for pre-closure site conditions to provide a conservative estimate of potential project impacts. Effective flow areas are locations where the flow velocity is greater than zero. The pre-closure site plan with the certified pre-construction survey contours is provided in Appendix C.

4. Hydrology

The Illinois River has an approximate drainage area of 13,000-mi² to the project location. Discharge estimates for the Illinois River were based on the 2005 USACE Upper Mississippi River System Flow Frequency Study (UMRSFFS). These discharges were acquired from USACE Flow Frequency Query (FFQ) website and are included in Appendix D. The FEMA Flood Insurance Study (FIS) provides flow estimates at river miles 157.7 and 231.1 and were interpolated to river mile 211.4. The UMRSSFFS was the basis for the effective 2005 USACE unsteady HEC-RAS model. The effective model captures detail within the Peoria Pool that is not taken into consideration by the FFQ and FIS. As shown in Table 1, the HEC-RAS unsteady regulatory model discharges used in determination of the BFE are significantly lower than those documented in the FFQ and the FIS. The discharges provided by the FFQ include a flow range that encompasses both the FEMA FIS and regulatory model discharges. As a result, the flows from the FFQ were used as the basis for a worst-case hydraulic analysis of the impacts to the Illinois River to determine compliance with IDNR-OWR floodway construction regulations. This analysis meets the worst-case analysis criteria outlined by 17 IAC 3700.20. Documentation of all discharges used in this assessment are provided in Appendix D. Table 1 shows a discharge comparison of the UMRSSFFS and FEMA FIS interpolated values.

Table 1: Published Steady Discharges for Illinois River

Source	Frequency (yr)							
	2	5	10	25	50	100	200	500
USACE Flow Frequency Study (FFQ website)	67,000	95,000	114,000	136,000	153,000	169,000	185,000	201,000
FEMA FIS (Interpolated)	-	-	86,485	-	113,459	124,386	-	149,775
2005 Effective USACE Unsteady HEC-RAS Model	-	-	-	-	-	114,000	-	-

5. Hydraulics

To determine compliance with IDNR-OWR regulations regarding construction activities in a floodway, a worst-case hydraulic analysis of potential impacts to the Illinois River was prepared. The FEMA effective model from the USACE is an unsteady model using the Hydrologic Engineering Center’s River Analysis System program version 3.1.3 (HEC-RAS). A duplicate effective model was run in HEC-RAS version 3.1.3 and served as the baseline for the study. Three (3) models were developed as part of this assessment which included a duplicate effective, corrected effective (existing/pre-closure conditions), and a proposed conditions (post-closure).

Duplicate Effective Model

The effective USACE HEC-RAS unsteady model v. 3.1.3 was run in v. 3.1.3 to ensure that the model ran successfully. Results showed that there was no change in computed water surface between the effective and duplicate effective hydraulic models.

Corrected Effective (Existing/Pre-Closure Conditions) Model

The duplicate effective model serves as the baseline for the corrected effective model. The duplicate effective model was imported into the current version of HEC-RAS, version 5.0.7 and was modified as follows to develop the corrected effective condition. To prepare the worst-case assessment of the proposed (post-closure) project, all cross-sections outside of river mile 213.66 to 208.60 were removed from the corrected effective model. Several cross-sections between the FEMA cross-sections 211.9 and 211.0 were added to the corrected effective model geometry to capture more detail for the project site geometry and proposed flow area changes. The corrected effective model was also converted to a steady state model to simplify the worst-case assessment. The downstream boundary condition was set as the water surface elevation of the downstream cross-section in the effective model. Hydraulic cross-section location maps are provided in Appendix E.

The corrected effective model serves as the existing model (pre-closure) on the basis that the pre-closure survey information does not contain man-made changes at the project site constructed since the effective date of the effective hydraulic modeling of the Illinois River.

Geometry for the added cross-sections was developed from a combination of interpolated channel geometry and LiDAR topography for the overbanks. The OWAP, OWPP and coal yard were further refined for the corrected effective model from pre-construction survey data provided by Geosyntec and incorporated into all relevant sections. A plan of the pre-construction site is included in Appendix C. Manning's n-values were assigned to the additional cross-sections using aerial imagery and corresponding to values in the effective model. A Manning's n-value of 0.025 was used for the natural channel. In the overbanks, values range from 0.045 in areas of moderate vegetation to 0.12 for areas of heavy vegetation and ineffective ponded water, including OWAP and OWPP, with a value of 0.03 for wetland areas.

Figure 2 includes FEMA FIRM data and shows divided flow around the project site. This appears to be a mapping error based on 2012 LiDAR topographic data. This area is not hydraulically connected at the upstream and downstream extent of this split in the floodplain. The topo data shows that areas upstream and downstream of the project site are above the BFE. However, for modeling purposes, these areas were modeled as effective flow through the project site as a conservative estimate of the potential project impacts to water surface elevations on the river.

Proposed Conditions (Post-Closure) Model

The proposed (post-closure) grading plan includes a soil cap on the OWAP and closure by removal through excavation of CCR in the OWPP. The existing (pre-closure) coal pile and coal yard has been regraded to provide additional storage and positive drainage to the Illinois River. The ponds and coal yards are shown in Figure 1. A plan of the proposed grading with the certified As-Built survey contours is provided in Appendix F. Utilizing the site grading plans from Geosyntec, a proposed conditions HEC-RAS model was created based upon the existing conditions HEC-RAS model where the proposed grading replaced the existing grading at the project site.

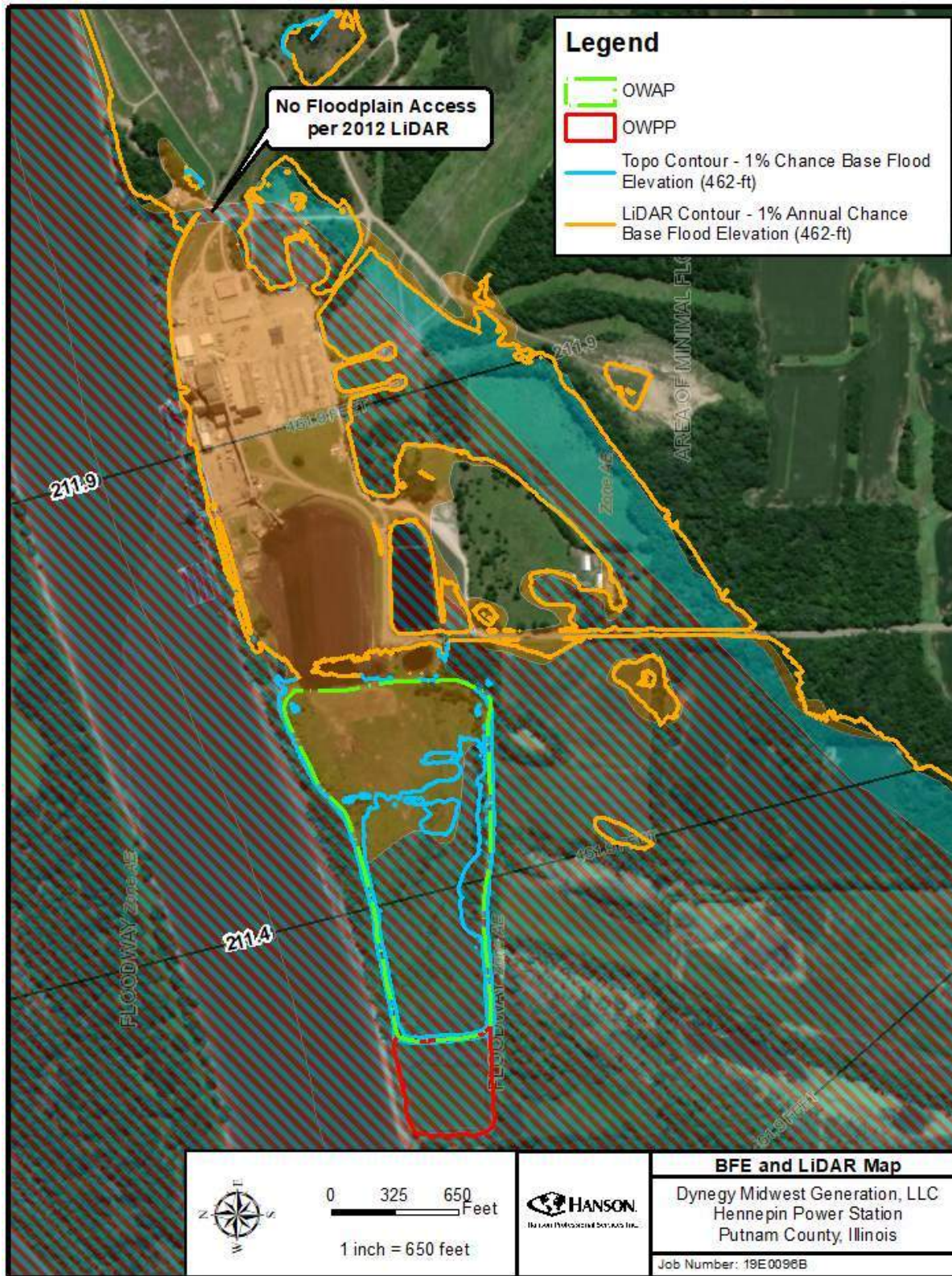


Figure 2: Topo and LiDAR Contours at Project Site

Worst-Case Analysis Results

Results from this model show the proposed (post-closure) grading creates a maximum increase in water surface elevation over existing conditions (pre-closure) of 0.00-ft for all flows modeled. In addition, the maximum increase in channel velocity from existing to proposed is 0.01-ft/s. Existing conditions channel velocities do not exceed 3-ft/s, which, together, demonstrate that there is not an increase in scour potential in the river channel. The model results, including water surfaces elevations and velocity comparison tables, are provided in Appendix G.

6. Dam Safety

The OWAP and OWPP surface impoundment dams are earthen embankment structures separating the ponds from the Illinois River. The primary purpose of the dams was impoundment of coal combustion residuals (CCR). The OWAP dam has a length of approximately 5,100-ft at the crest, with a height of 16-ft and a crest at elevation 464.0-ft. The OWAP pond has a surface area of 28.9 acres at the dam crest with a maximum pre-construction impounding volume of 78.6 acre-feet. The OWPP pond shares its east dam embankment with the OWAP pond. The OWPP dam has a length of approximately 1,900-ft at the crest, with a height of 11-ft and a crest at elevation 459.0-ft (NAVD 88). The OWPP pond has a surface area of 5.2 acres at the dam crest with a maximum pre-construction impounding volume of 43.4 acre-feet. The OWAP and OWPP dams are located on the southern bank of the Illinois River and failure of the dams could potentially discharge directly to the Illinois River to the north and to the Illinois River floodplain to the south. According to 40 CFR 257.73, the OWAP and OWPP ponds are significant hazard potential classification CCR surface impoundments.

Pond Closure Methods

The closure plan for the ponds, submitted by Geosyntec on behalf of Dynegy, was approved by IEPA on June 19, 2018. The IEPA approval letter and closure plans are included in Appendix H. According to these plans, Dynegy has completed the closure of the OWPP and OWAP as follows:

- The OWPP was closed-by-removal. CCR was removed from the impoundment and the perimeter dikes will be degraded to elevation 450-ft, equal to the Illinois River flood stage of 450.0-ft. The perimeter dike was breached to allow the area to freely drain to the Illinois River. A sheet pile wall provided temporary support between the OWPP and OWAP during construction, and a compacted clay buttress will serve as long-term support. Completion of construction on the OWPP allows for free surface drainage and the structure will no longer be intended to impound water.
- The OWAP was closed through the installation of a geomembrane in addition to fill within the pond. Ponded surface water was removed from the OWAP. The OWAP impoundment was regraded to support the final cover system. The geomembrane cover consists of a 40-mil textured LLDPE and soil cover system. Vegetation will be established on the soil cover layer using native grasses. The cover system was constructed above the pre-closure top of dam eliminating the pre-closure impounding capacity of the structure. The post-closure cover system freely drains to the Illinois River and the structure will no longer be intended to impound water.

Detail on construction activities and related documentation are provided in the Stormwater Pollution Prevention Plan (SWPPP) and Construction Quality Assurance (CQA) plan included in Appendix I and Appendix J, respectively.

Regulatory Criteria

The OWAP and OWPP ponds are regulated in accordance with 17 Illinois Administrative Code (IAC), IDNR-OWR Part 3702 Rules for the Construction and Maintenance of Dams. A failure of the OWAP and OWPP dams under any circumstances would discharge to the Illinois River and have a low probability for causing loss of life. No permanent structures for human habitation are located in the breach inundation area. Under pre-closure operation, the dams are considered small-size Class II (significant hazard potential) dams due to the environmental risk associated with the impounded CCR material. In accordance with CCR design requirements for the pre-closure condition of the OWAP and OWPP ponds act as a closed loop system and the normal operating water surface is maintained by portable pumps.

Removal of CCR material from the OWPP and capping the OWAP began on August 6, 2019 and will be substantially completed on November 17, 2020. Closure of the OWPP and OWAP ponds met IEPA criteria for Closure and Post-Closure Care of CCR surface impoundments under Title 35 Illinois Administrative Code 620.250 per the IEPA approval letter of the closure plan included in Appendix H.

A supporting geotechnical evaluation for closure by capping of the OWAP was provided by Geosyntec. The geotechnical analysis was developed in accordance with 40 CFR Part 257.73 Subpart D. The geotechnical calculations received from Geosyntec, provided in Appendix K, indicate that the OWAP closure will meet the requirements for dam abandonment based on the following special conditions:

1. The pre-closure impounded material is of a non-flowable nature;
2. The material is not susceptible to liquefaction under seismic loading. The containing dam embankment provides a sufficient factor of safety under static conditions;
3. The OWAP cap is graded to freely drain. The OWAP cover consists of a 40-mm textured LLDPE geomembrane and does not permit resaturation of the CCR material; and
4. A final inspection report will be completed and submitted within 1 year of abandonment.

7. Compensatory Storage

17 IAC, IDNR-OWR Part 3708 outlines the rules for floodway construction in specific northeastern Illinois counties. This project is not located in one of the northeastern counties listed under Part 3708. However, IDNR-OWR made a special request that compensatory storage be provided for the floodplain fill associated with the closure of the OWAP and OWPP. The compensatory storage must be placed between the post-closure normal water elevation and the post-closure 100-yr flood elevation at a 1-to-1 ratio. The site has been graded to meet this special request and has been documented in the post-closure grading plans by Geosyntec shown in Appendix F. Table 2 shows the net compensatory storage calculation.

Hanson believes that the completed closure of the OWPP and OWAP ponds meet this special request. The basis of this determination is that the site work meets the following special conditions:

- Floodplain access to the OWPP and Coal Yard compensatory storage are provided within the property limits of Dynegey.
- Compensatory storage provided in the OWPP, Coal Yard, Coal Yard Pond East and Coal Yard Pond West will be free draining.

- The post-closure OWAP cover system produces 78,868 cu. yd. of fill below the Effective BFE of 461.9-ft. The regrading of the coal pile, Coal Yard Pond East and Coal Yard Pond West adds an additional 1,232 cu. yd of fill for a total of 80,100 cu. yd of fill below the Effective BFE. Removal of CCR material from the OWPP in addition to the regrading of OWAP, Coal Pile, Coal Yard Pond East and Coal Yard Pond West result in 77,857 cu. yd. of cut below the Effective BFE. This produces a net fill of 2,243 of cu. yd. However, the total volume of water in the ponds below the Effective BFE prior to construction was 23,217 cu. yd., while the total volume of water in the ponds was reduced to 15,999 cu. yd. after construction through the replacement or regrading of the pond outlet structures to drop the normal pool elevation. This provides an additional 7,218 cu. yd. of cut to provide storage below the Effective BFE. The resulting net volume below the Effective BFE is 4,975 cu. yd of cut.
- All post-closure material removed is between the normal water elevation and the post-closure 100-yr flood elevation.

Table 2: Cut and Fill Volumes

Location	Cut Below EL 461.9-ft (Cu. Yards)	Pre-Construction Impounded Water Volume (Cu. Yards)	Fill Below EL 461.9-ft (Cu. Yards)	Post-Construction Impounded Water Volume (Cu. Yards)
OWAP	2,099	0	78,868	0
OWPP	51,359	10,047	0	9
Coal Pile	11,992	0	679	0
Coal Yard Pond East	9,041	12,815	163	14,077
Coal Yard Pond West	3,366	355	390	1,913
Total	77,857	23,217	80,100	15,999
Total Cut & Fill	101,074		96,099	
Cut - Fill	4,975			

8. Public Waters

All construction associated with the pond closure will be outside the banks of the Illinois River or any public water, indicating that the requirements of 17 IAC, IDNR Part 3704 would not be applicable to this assessment.

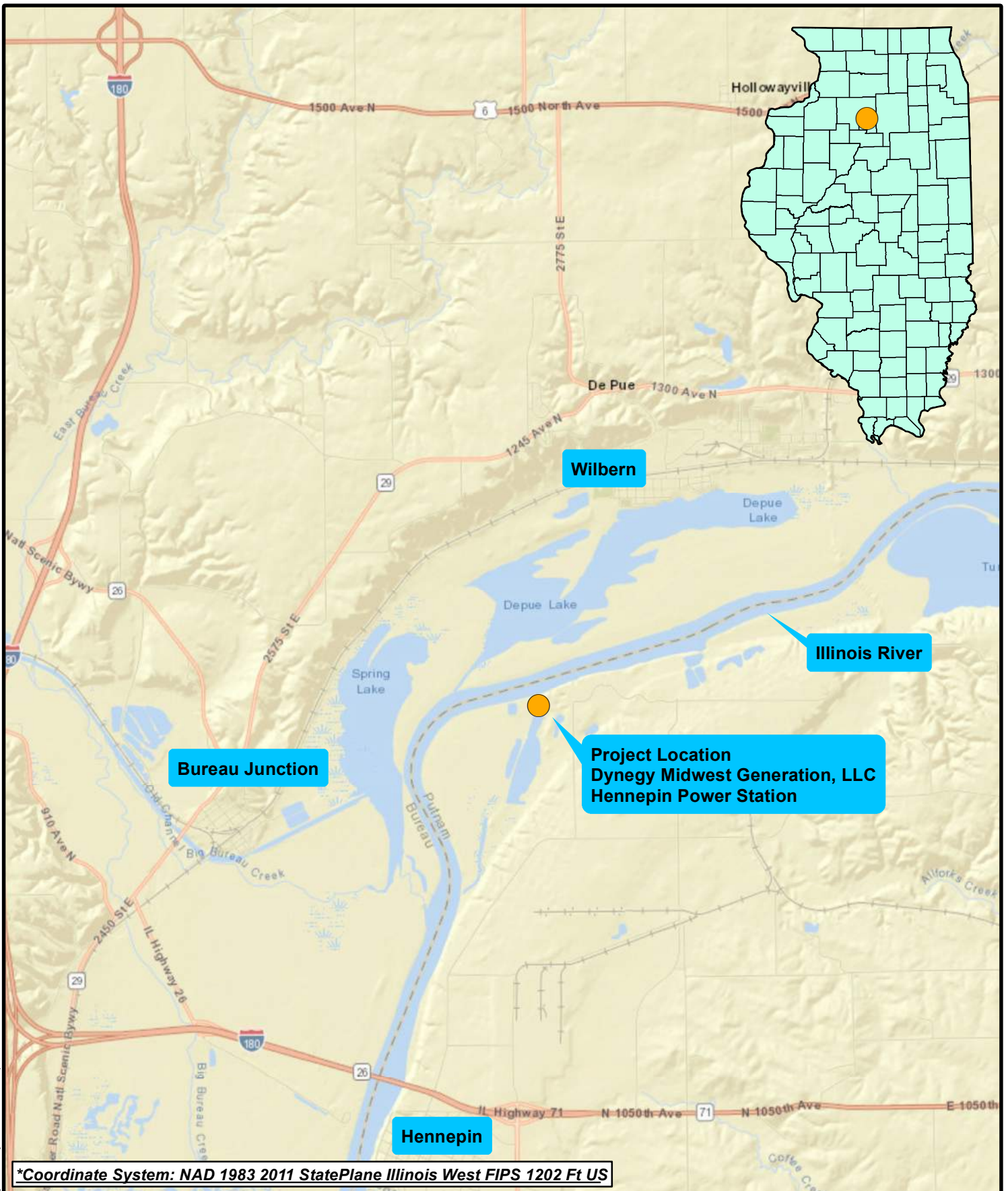
9. Conclusion

Based on the information presented in this technical assessment, the post-closure plans meets 17 IAC, IDNR Part 3700, 3702, and 3704. Sections 7 and 8 outline how the conditions for Parts 3702 and 3704 are met, while the post-closure grading meets Parts 3700 and 3704 through the following conditions:

1. The post-closure construction associated with the closure of the OWAP and OWPP will not have an adverse impact on Illinois River water surfaces profiles.
2. The post-closure construction does not increase in average channel velocity beyond the scour velocity.
3. No construction is within the banks of the Illinois River.

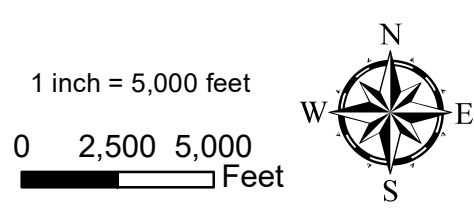
Appendix A
Site Location Map





***Coordinate System: NAD 1983 2011 StatePlane Illinois West FIPS 1202 Ft US**

I:\19\obs\19E0096B\CAD\GIS\Projects\Project Location Map.mxd



Project Location Map

Dynegy Midwest Generation, LLC
 Hennepin Power Station
 Putnam County, Illinois

Job Number: 19E0096B

Appendix B
FEMA Data



FLOOD INSURANCE STUDY



PUTNAM COUNTY, ILLINOIS AND INCORPORATED AREAS

COMMUNITY NAME	COMMUNITY NUMBER
*GRANVILLE, VILLAGE OF	171308
HENNEPIN, VILLAGE OF	170570
*MAGNOLIA, VILLAGE OF	170571
MARK, VILLAGE OF	170572
MC NABB, VILLAGE OF	170573
PUTNAM COUNTY (UNINCORPORATED AREAS)	170993
STANDARD, VILLAGE OF	171012

Putnam
County



*NO SPECIAL FLOOD HAZARD AREAS IDENTIFIED

FEBRUARY 4, 2011



Federal Emergency Management Agency

FLOOD INSURANCE STUDY NUMBER

17155CV000A

flooding of the Illinois River from Lockport to the mouth, the Missouri River below the Gavins Point Dam to the mouth, and the Mississippi River from St. Paul to the confluence with the Ohio River. The St. Louis District conducted the study of the Illinois River from the confluence with the Mississippi River to the La Grange Lock and Dam tailwater (river mile 80.2). The Rock Island District conducted the study of the Illinois River from river mile 80.2 to Lockport, IL.

Technical aspects of the study include impacts of levees, land use change, and climate variation. The Illinois River flows were determined using data from the period 1940 to 1998. In situations where historic records were not adequate to develop discharge frequency relationships or to verify the results, hydrologic modeling was used to create synthetic flows based on rainfall.

A summary of the drainage area-peak discharge relationships for all the streams studied by detailed methods is shown in Table 4, "Summary of Discharges."

Table 4- Summary of Discharges

<u>Flooding Source and Location</u>	<u>Drainage Area (square miles)</u>	<u>Peak Discharges (cubic feet per second)</u>			
		<u>10-Percent-Annual-Chance</u>	<u>2-Percent-Annual-Chance</u>	<u>1-Percent-Annual-Chance</u>	<u>0.2-Percent-Annual-Chance</u>
Illinois River					
At Peoria Lock & Dam RM (157.7)	14,550	66,000	82,000	90,000	111,000
At Starved Rock Lock and Dam RM (231.1)	11,060	94,000	125,000	137,000	164,000

3.2 Hydraulic Analyses

Analyses of the hydraulic characteristics of flooding from the sources studied were carried out to provide estimates of the elevations of floods of the selected recurrence intervals. Users should be aware that flood elevations shown on the FIRM represent rounded whole-foot elevations and may not exactly reflect the elevations shown on the Flood Profiles or in the Floodway Data tables in the FIS report. Flood elevations shown on the FIRM are primarily intended for flood insurance rating purposes. For construction and/or floodplain management purposes, users are encouraged to use the flood elevation data presented in this FIS in conjunction with the data shown on the FIRM.

Pre-Countywide FIS

New detailed study data on the Illinois River supersedes the pre-countywide hydraulic analyses. No other detailed studies were included previously.

FLOODING SOURCE		FLOODWAY			1-PERCENT-ANNUAL-CHANCE FLOOD WATER SURFACE ELEVATION (FEET NAVD88)			
CROSS SECTION	DISTANCE ¹	WIDTH (FEET)	SECTION AREA (SQUARE FEET)	MEAN VELOCITY (FEET PER SECOND)	REGULATORY FROM UNET MODEL	WITHOUT FLOODWAY FROM UNET MODEL	WITH FLOODWAY	INCREASE
Illinois River (continued)								
206.5	206.5	16,023/4,715 ²	*	*	461.6	461.6	*	*
207	207	12,276/685 ²	*	*	461.6	461.6	*	*
207.4	207.4	12,069/579 ²	*	*	461.6	461.6	*	*
207.58	207.58	11,992/954 ²	*	*	461.6	461.6	*	*
207.84	207.84	12,098/1,040 ²	*	*	461.6	461.6	*	*
208.1	208.1	12,210/992 ²	*	*	461.7	461.7	*	*
208.6	208.6	12,065/601 ²	*	*	461.7	461.7	*	*
209.1	209.1	11,675/556 ²	*	*	461.7	461.7	*	*
209.6	209.6	11,507/1,952 ²	*	*	461.8	461.8	*	*
210.1	210.1	9,331/4,286 ²	*	*	461.8	461.8	*	*
210.5	210.5	9,120/4,971 ²	*	*	461.8	461.8	*	*
211	211	9,652/4,268 ²	*	*	461.9	461.9	*	*
211.4	211.4	9,102/3,066 ²	*	*	461.9	461.9	*	*
211.9	211.9	6,932/1,101 ^{2,3}	*	*	461.9	461.9	*	*
212.4	212.4	6,531/485 ²	*	*	461.9	461.9	*	*
212.9	212.9	6,194/1,121 ²	*	*	462.0	462.0	*	*
213.3	213.3	6,547/1,445 ²	*	*	462.0	462.0	*	*
213.66	213.66	6,904/1,735 ²	*	*	462.0	462.0	*	*
213.88	213.88	5,445/1,907 ²	*	*	461.9	461.9	*	*
214.2	214.2	6,597/3,857 ²	*	*	462.1	462.1	*	*
214.58	214.58	6,102/4,296 ²	*	*	462.1	462.1	*	*
214.96	214.96	5,052/4,524 ²	*	*	462.2	462.2	*	*

¹ Miles above confluence with the Mississippi River

² Total width / width within county

³ Widths include areas not inundated by the 1-percent-annual-chance flood

* Data not available.

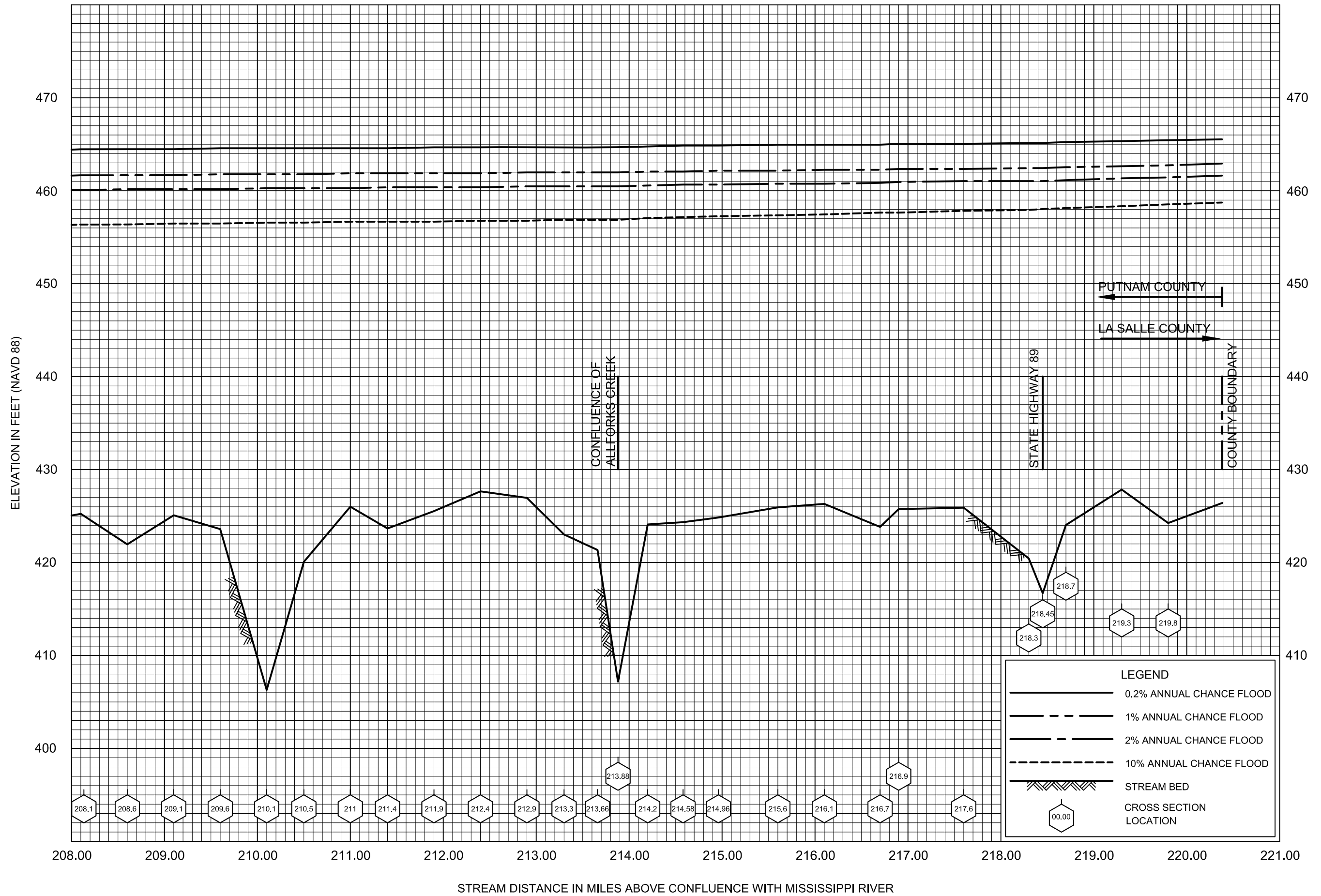
TABLE 7

FEDERAL EMERGENCY MANAGEMENT AGENCY

**PUTNAM COUNTY, IL
AND INCORPORATED AREAS**

FLOODWAY DATA

ILLINOIS RIVER

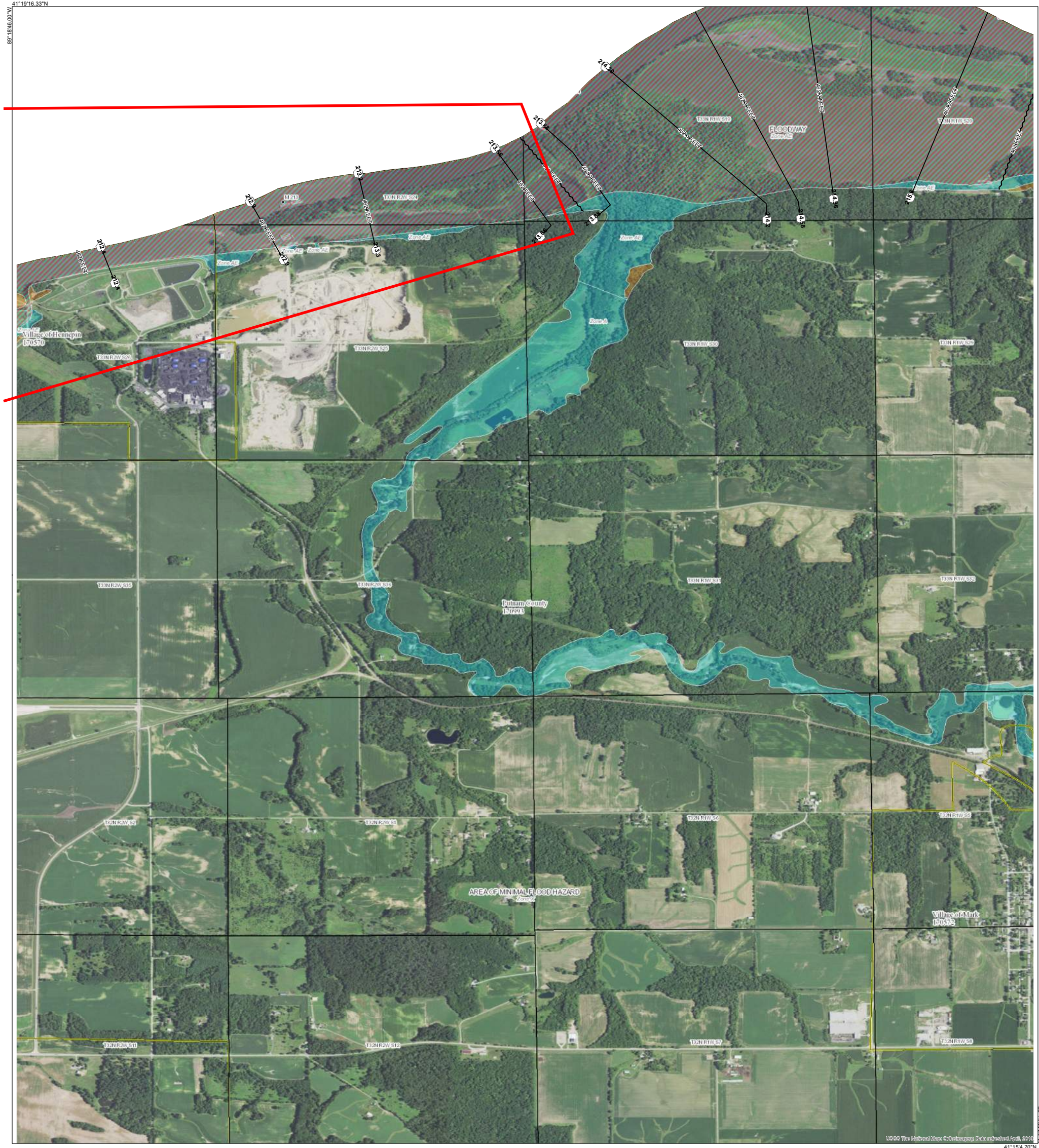


FLOOD PROFILES

ILLINOIS RIVER

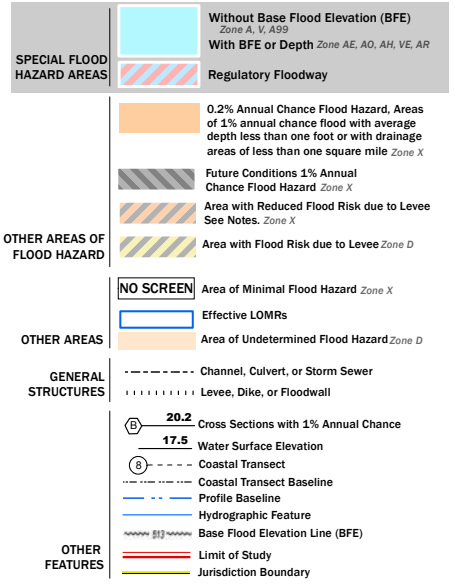
FEDERAL EMERGENCY MANAGEMENT AGENCY

**PUTNAM COUNTY, IL
AND INCORPORATED AREAS**



FLOOD HAZARD INFORMATION

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT



NOTES TO USERS

For information and questions about this Flood Insurance Rate Map (FIRM), available products associated with this FIRM, including historic versions, the current map date for each FIRM panel, how to order products, or the National Flood Insurance Program (NFIP) in general, please call the FEMA Map Information eXchange at 1-877-FEMA-MAP (1-877-336-2627) or visit the FEMA Flood Map Service Center website at <http://msc.fema.gov>. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of this map. These may be ordered directly from the Flood Map Service Center at the number listed above.

Communities annexing land on adjacent FIRM panels must obtain a current copy of the adjacent panel as well as the current FIRM Index. These may be ordered directly from the Flood Map Service Center at the number listed above.

For community and countywide map dates refer to the Flood Insurance Study Report for this jurisdiction.

To determine if flood insurance is available in this community, contact your insurance agent or call the National Flood Insurance Program at 1-800-638-6620.

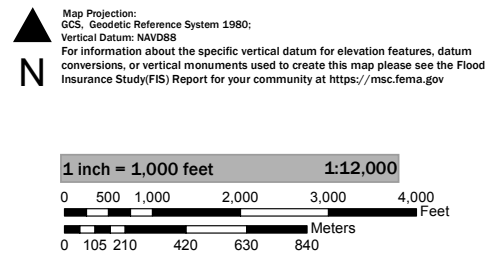
Basemap information shown on this FIRM was provided in digital format by USDA, Farm Service Agency (FSA). This information was derived from NAIP, dated April 11, 2018.

This map was exported from FEMA's National Flood Hazard Layer (NFHL) on **02/24/2019 10:21:04 AM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time. For additional information, please see the Flood Hazard Mapping Updates Overview Fact Sheet at <https://www.fema.gov/media-library/assets/documents/118418>.

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SCALE



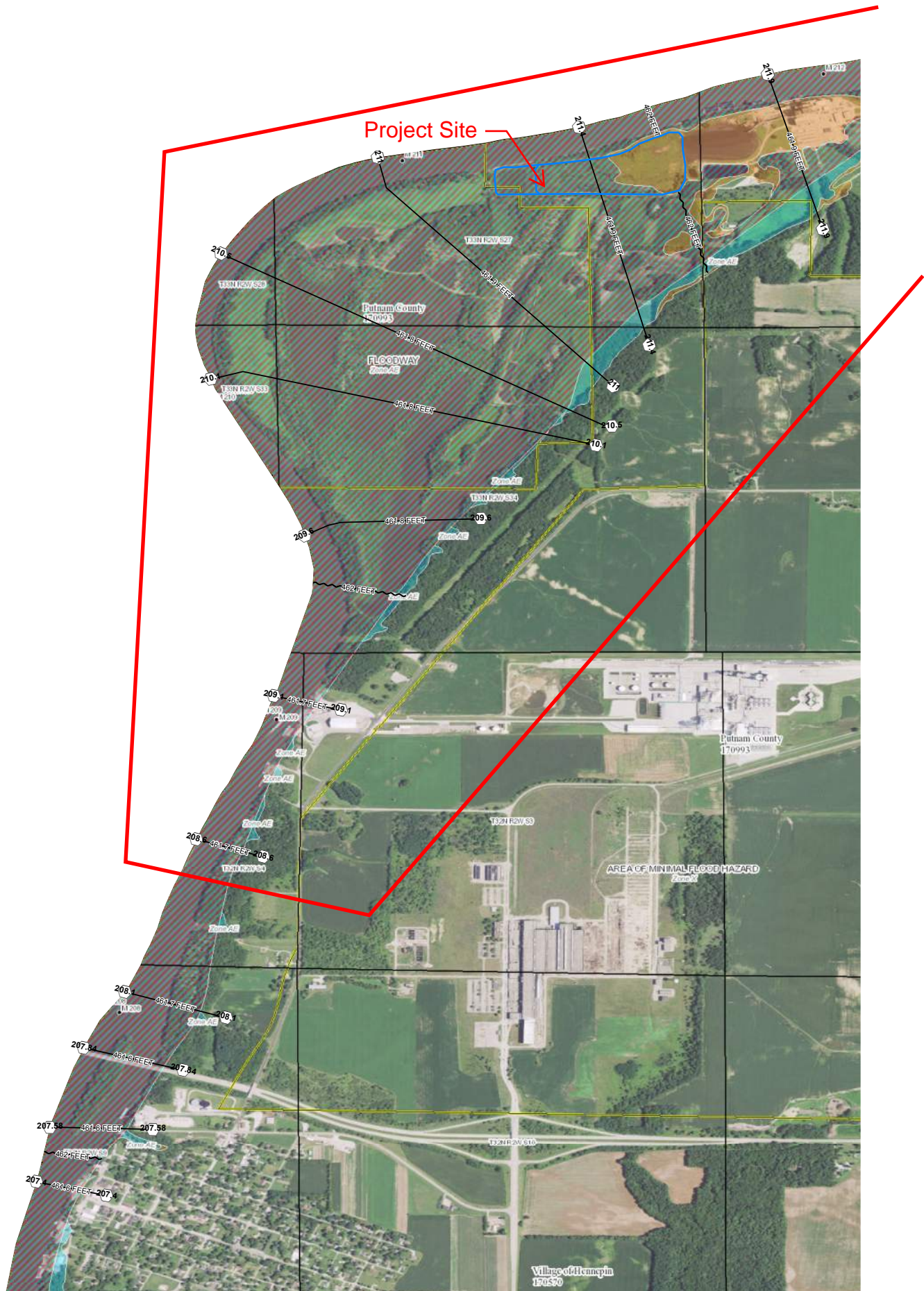
NATIONAL FLOOD INSURANCE PROGRAM
FLOOD INSURANCE RATE MAP

PUTNAM COUNTY, ILLINOIS AND INCORPORATED AREAS
PANEL 25 OF 175

Panel Contains:

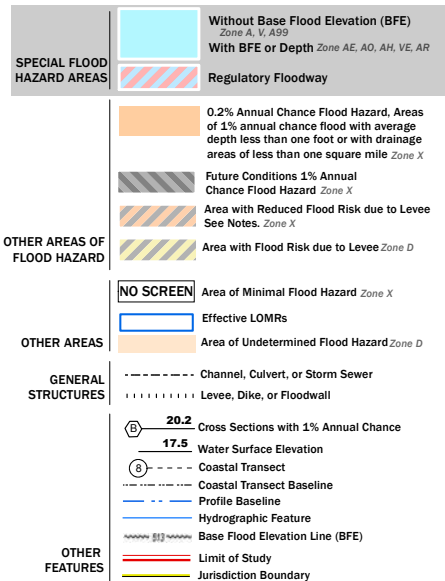
COMMUNITY	NUMBER	PANEL
VILLAGE OF HENNEPIN ILLINOIS	170570	0025
BUREAU COUNTY ILLINOIS	170729	0025
PUTNAM COUNTY ILLINOIS	170993	0025
VILLAGE OF MARK ILLINOIS	170572	0025
VILLAGE OF DEPUJE ILLINOIS	170012	0025

MAP NUMBER 17155C0025E
EFFECTIVE DATE 02/04/2011



FLOOD HAZARD INFORMATION

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT



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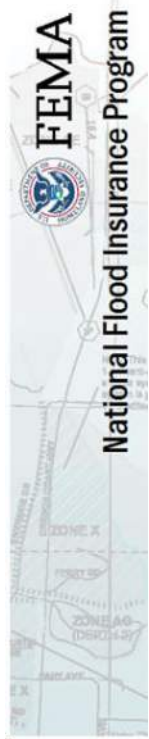
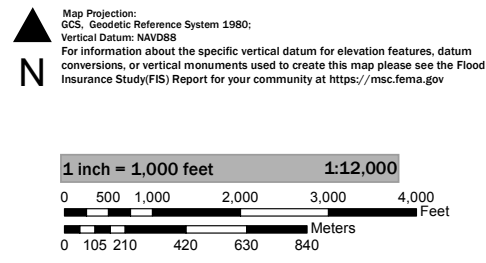
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SCALE



**NATIONAL FLOOD INSURANCE PROGRAM
FLOOD INSURANCE RATE MAP**

**PUTNAM COUNTY, ILLINOIS
AND INCORPORATED AREAS**
PANEL 15 OF 175

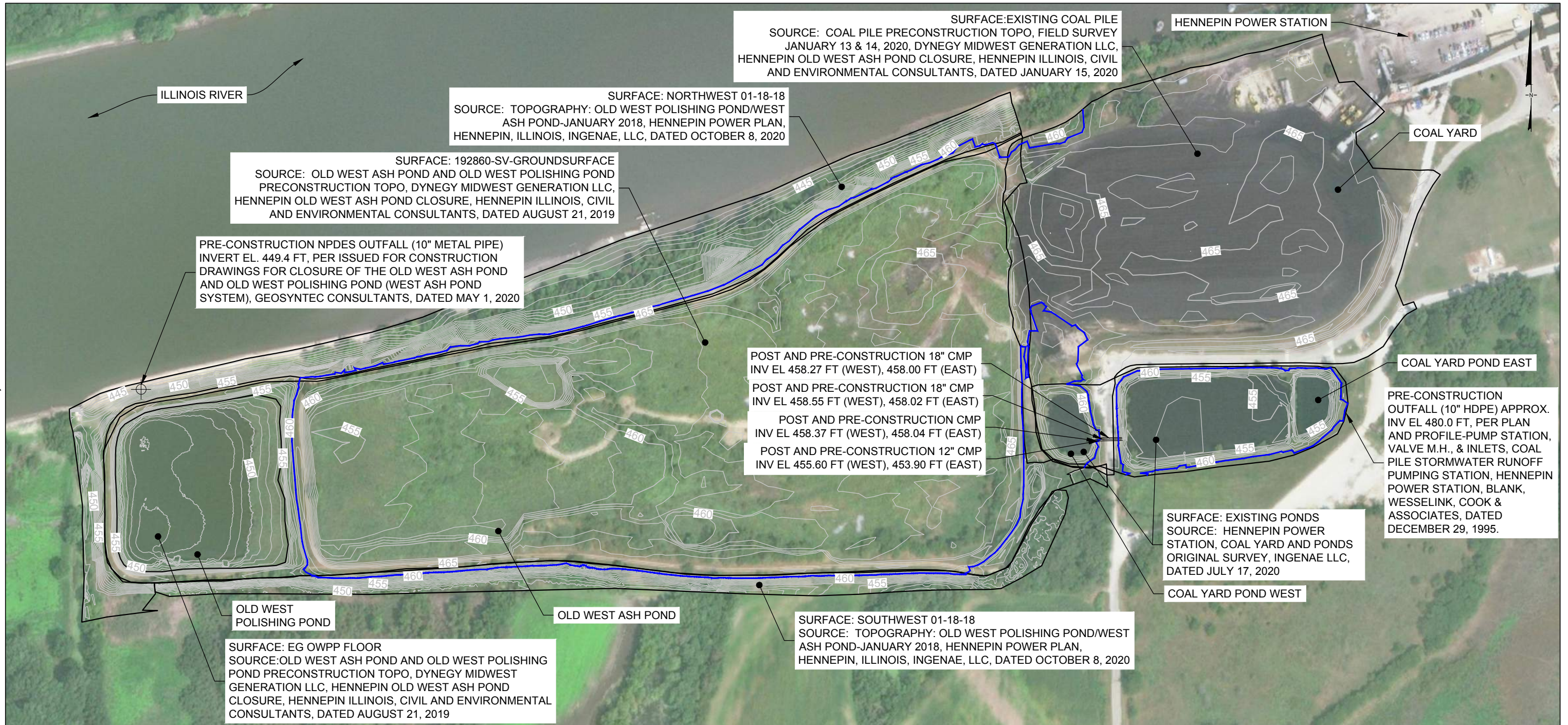
Panel Contains:

COMMUNITY	NUMBER	PANEL
VILLAGE OF HENNEPIN ILLINOIS	170570	0015
BUREAU COUNTY ILLINOIS	170729	0015
PUTNAM COUNTY ILLINOIS	170993	0015

Appendix C
Existing Site Plan



L:\CADD\IDYNEGY\HENNEPIN\CLOSURE DESIGN - CHE8356B\VOLUMES\CHE8356B-X001 - COMBINED EG TOPO SURFACES - Last Saved by: SNichols on 10/11/20



NOTES:

1. TOPOGRAPHIC SURVEY DATA WAS COLLECTED BY MULTIPLE SURVEYORS ON MULTIPLE DATES AND MERGED INTO A COMPOSITE PRE-CONSTRUCTION TOPOGRAPHIC SURFACE FOR THE AREAS INDICATED ON THIS DRAWING.
2. SURVEY DATA USED TO CREATE THIS FIGURE WAS COLLECTED IN THE NAD83 HORIZONTAL DATUM AND THE NAVD88 VERTICAL DATUM.
3. THE BACKGROUND AERIAL IMAGE WAS OBTAINED FROM GOOGLE EARTH AND WAS COLLECTED ON SEPTEMBER 20, 2015.

LEGEND

- 465 — SURFACE ELEVATIONS
- SURVEY BOUNDARY
- LIMITS OF BASE FLOOD ELEVATION 461.9 FT



DRAFT

COMPOSITE PRE-CONSTRUCTION GRADES
HENNEPIN POWER STATION
WEST ASH POND SYSTEM CLOSURE

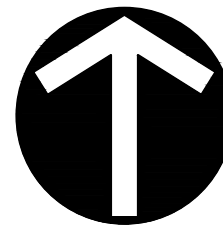


FIGURE

4

PROJECT NO: CHE8400

OCTOBER 2020

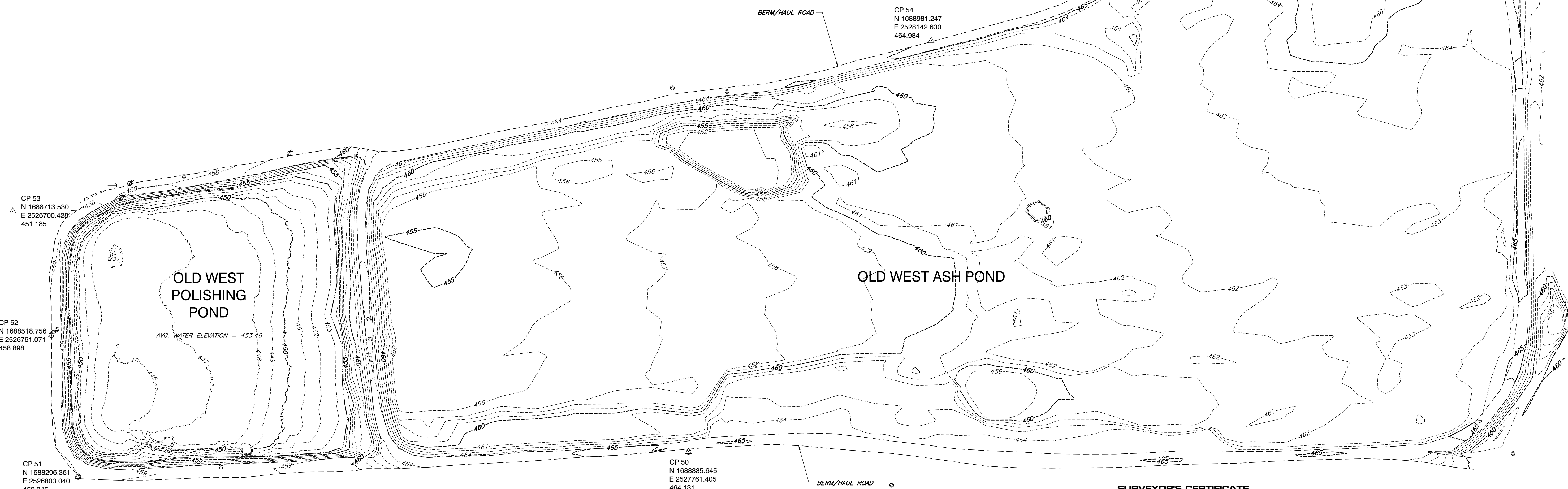


NORTH

REVISION RECORD		
NO	DATE	DESCRIPTION
1	09/29/2019	ADDED POLISHING POND CONTOURS TO EXISTING TOPOGRAPHIC CONDITIONS
2	10/07/2020	ADD CONTROL DATUM & SURVEYOR'S CERTIFICATE

SUBMITTAL RECORD		
NO	DATE	DESCRIPTION

N 1689443.260
E 2529063.564
△ 460.760



CP 53
N 1688713.530
E 2526700.428
451.185

CP 52
N 1688518.756
E 2526761.071
458.898

CP 51
N 1688296.361
E 2526803.040
459.345

CP 54
N 1688981.247
E 2528142.630
464.984

CP 50
N 1688335.645
E 2527761.405
464.131

OLD WEST
POLISHING
POND

AVG. WATER ELEVATION = 453.46

OLD WEST ASH POND

BERM/HAUL ROAD

BERM/HAUL ROAD

SURVEYOR'S CERTIFICATE

STATE OF ILLINOIS }
COUNTY OF DUPAGE } SS

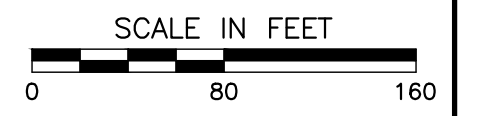
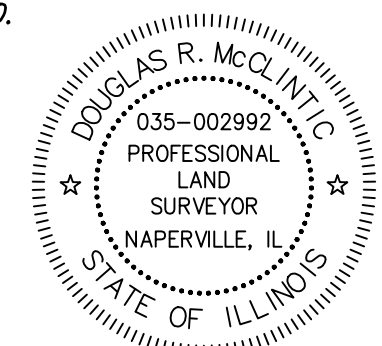
I HEREBY CERTIFY THAT THIS PLAT, AND THE SURVEY UPON WHICH IT IS BASED, HAS BEEN PREPARED UNDER MY DIRECT SUPERVISION. ALL DISTANCES ARE GIVEN IN FEET AND DECIMALS THEREOF.

THIS PLAT HAS BEEN PREPARED BY CIVIL & ENVIRONMENTAL CONSULTANTS, INC. ILLINOIS LICENSED PROFESSIONAL DESIGN FIRM NO. 184.004-002. LICENSE EXPIRES APRIL 30, 2021. FOR THE EXCLUSIVE USE OF THE CLIENT NOTED HEREON. REPRODUCTION OF USE BY THIRD PARTIES IS STRICTLY PROHIBITED WITHOUT THE WRITTEN PERMISSION OF THE UNDERSIGNED. THIS PROFESSIONAL SERVICE CONFORMS TO THE CURRENT ILLINOIS MINIMUM STANDARDS FOR A BOUNDARY SURVEY.

FIELDWORK WAS COMPLETED ON AUGUST 29, 2019.
GIVEN UNDER MY HAND AND SEAL THIS 7TH DAY OF OCTOBER, 2020.

Douglas R. McClinton

ILLINOIS LICENSED PROFESSIONAL LAND SURVEYOR NO. 035-002992
LICENSED VALID THROUGH NOVEMBER 30, 2020



- REFERENCE**
- TOPOGRAPHIC INFORMATION BASE ON ILLINOIS WEST ZONE STATE PLANE NAD 83 (2011) NAVD 88 (VRS) GEOID 18. SURVEY CONDUCTED BY CIVIL & ENVIRONMENTAL CONSULTANTS, INC. ON JANUARY 15, 2020.
 - CONTROL POINTS 50, 51, 52, 53, 54 AND 55 COORDINATES AND ELEVATION ARE SHOWN, WERE USED TO OBTAIN THIS SURVEY. IT IS RECOMMENDED TO VERIFY A MINIMUM OF TWO CONTROL POINTS PRIOR TO ANY WAY WORK BEING DONE.

CEC
Civil & Environmental Consultants, Inc.
1230 East Diehl Road, Suite 200 - Naperville, IL 60563
Ph: 630.963.6026 - 877.963.6026 - Fax: 630.963.6027
www.cecinc.com

**DYNEGY MIDWEST GENERATION LLC
HENNEPIN OLD WEST ASH POND CLOSURE
HENNEPIN, ILLINOIS**

DRAWN BY: **MSK** CHECKED BY: **DRM** APPROVED BY: **DRM**
DATE: **08/21/2019** DWG SCALE: **1"=80'** PROJECT NO.: **192-860.AW00**

**OLD WEST ASH POND AND
OLD WEST POLISHING POND
PRECONSTRUCTION TOPO**

DRAWING NO.: **1**
SHEET **1** OF **1**

P:\2019\192-860-Pre\192-860-Pre.dwg (1/1) 11/10/2020 10:11:11 AM



Legend

- Borings, Test Pits and Piezometers
- Major Contour Line
- - - Minor Contour Line

NOTE:

1. THIS SURVEY WAS PERFORMED BY INGENAE PERSONNEL ON JANUARY 17 AND 18 OF 2018
2. THE CONTOURS, COORDINATES AND ELEVATIONS AS SHOWN HEREON WHERE OBTAINED BY USE OF PROFESSIONAL SURVEY PRECISION GRADE GPS AND/OR ROBOTIC TOTAL STATION EQUIPMENT. THE DATUM USED AND AS SHOWN HEREON IS BASED ON, HORIZONTAL: NAD 1983 STATE PLANE COORDINATE ZONE-ILLINOIS WEST (US SURVEY FEET) AND VERTICAL: NAVD 88 (US SURVEY FEET).



10/8/2020

Submissions / Revisions:	Date:
1	
2	
3	
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11	
12	
13	

Project Name & Location:

**HENNEPIN
POWER PLANT
HENNEPIN, IL**

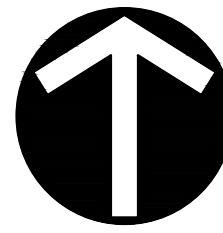
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Drawing Name:

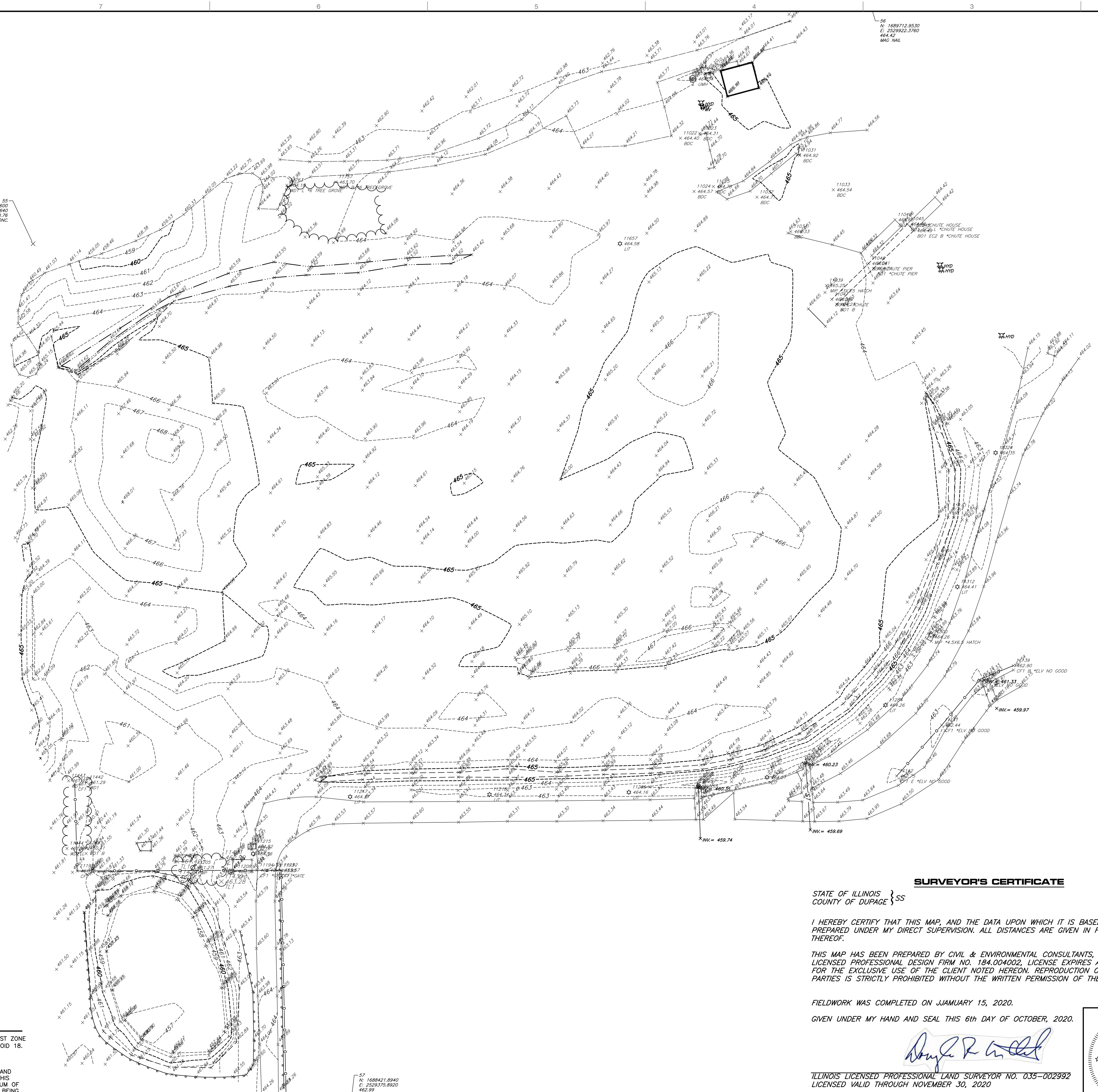
**TOPOGRAPHY: OLD WEST
POLISHING POND/WEST
ASH POND-JANUARY 2018**

Date:	10/8/2020	Project No.	
Type:	SITE	Drawing No.	
Drawn By:	CB	1	
Approved By:	MG		
Scale:	AS NOTED		



NORTH

55
N: 1689443.9600
E: 2529922.3700
464.42
462.39
DISC IN CONC.



57
N: 1688421.8940
E: 2529375.8920
462.39
IRON ROD W/ CAP

REVISION RECORD		
NO	DATE	DESCRIPTION
1	10/06/2020	ADD CONTROL DATUM & SURVEYORS CERTIFICATE

SUBMITTAL RECORD		
NO	DATE	DESCRIPTION

A:\2019\192-860-001\Sump\Draw\192-860-001-Construction Engineering.dwg | 192-860-001-151-01-Civil | 10/6/2020 2:49 PM

- REFERENCE**
1. TOPOGRAPHIC INFORMATION BASE ON ILLINOIS WEST ZONE STATE PLANE NAD 83 (2011) NAVD 88 (VRS) GEOID 18. SURVEY CONDUCTED BY CIVIL & ENVIRONMENTAL CONSULTANTS, INC. ON JANUARY 15, 2020.
 2. CONTROL POINTS 55, 56 AND 57, COORDINATES AND ELEVATION ARE SHOWN, WERE USED TO OBTAIN THIS SURVEY. IT IS RECOMMENDED TO VERIFY A MINIMUM OF TWO CONTROL POINTS PRIOR TO ANY WAY WORK BEING DONE.

SURVEYOR'S CERTIFICATE

STATE OF ILLINOIS } SS
COUNTY OF DUPAGE } SS

I HEREBY CERTIFY THAT THIS MAP, AND THE DATA UPON WHICH IT IS BASED, HAS BEEN PREPARED UNDER MY DIRECT SUPERVISION. ALL DISTANCES ARE GIVEN IN FEET AND DECIMALS THEREOF.

THIS MAP HAS BEEN PREPARED BY CIVIL & ENVIRONMENTAL CONSULTANTS, INC. ILLINOIS LICENSED PROFESSIONAL DESIGN FIRM NO. 184.004002, LICENSE EXPIRES APRIL 30, 2021. FOR THE EXCLUSIVE USE OF THE CLIENT NOTED HEREON. REPRODUCTION OF USE BY THIRD PARTIES IS STRICTLY PROHIBITED WITHOUT THE WRITTEN PERMISSION OF THE UNDERSIGNED.

FIELDWORK WAS COMPLETED ON JANUARY 15, 2020.
GIVEN UNDER MY HAND AND SEAL THIS 6th DAY OF OCTOBER, 2020.

Douglas R. McQuinn

ILLINOIS LICENSED PROFESSIONAL LAND SURVEYOR NO. 035-002992
LICENSED VALID THROUGH NOVEMBER 30, 2020



CEC
Civil & Environmental Consultants, Inc.
333 Baldwin Road • Pittsburgh, PA 15205
Ph: 412.429.2324 • 800.365.2324 • Fax: 412.429.2114
www.cecinc.com

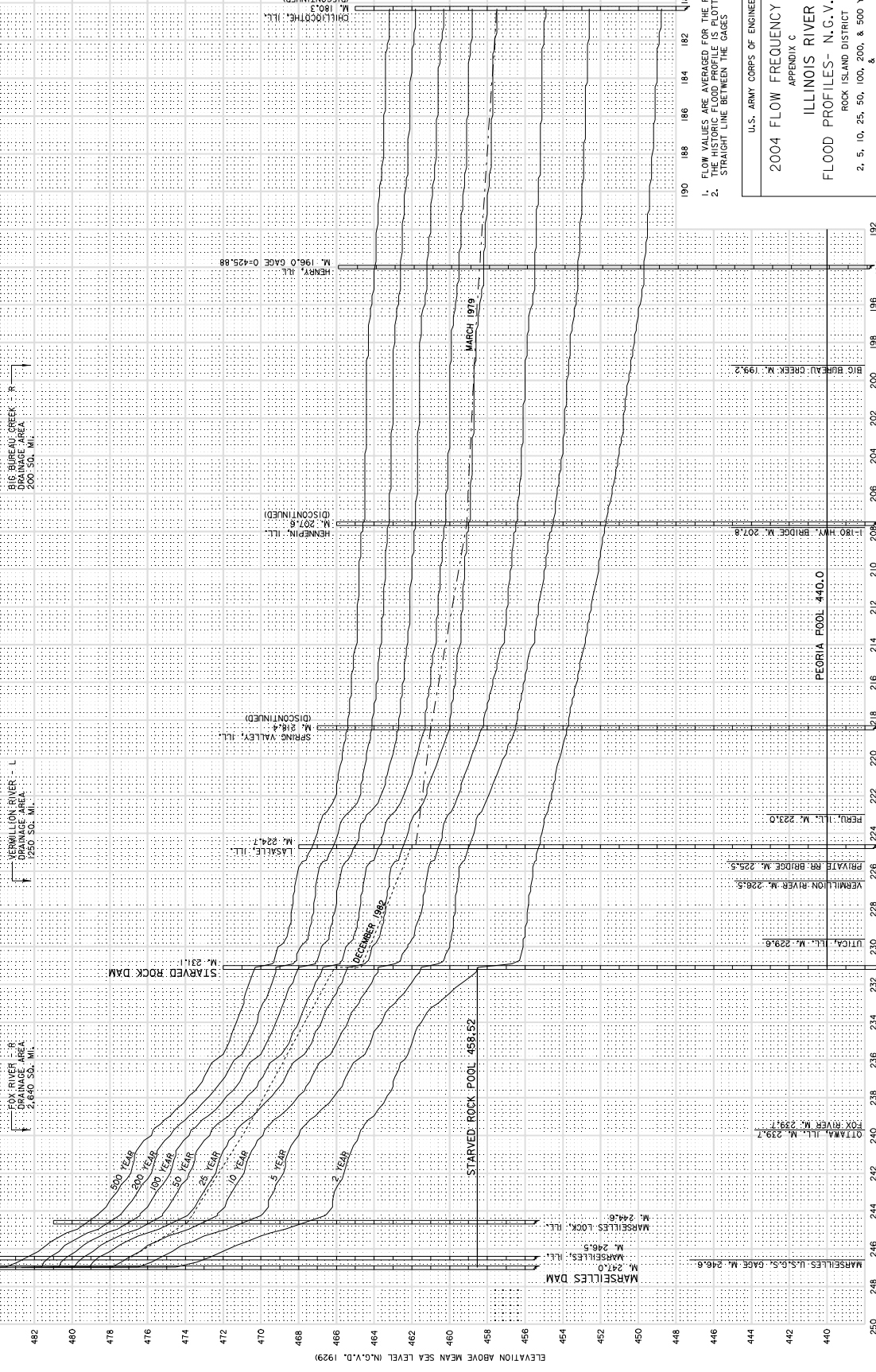
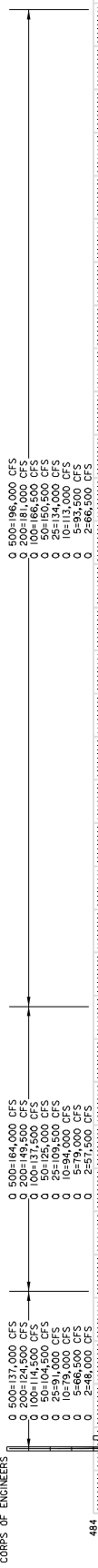
**DYNEGY MIDWEST GENERATION LLC
HENNEPIN OLD WEST ASH POND CLOSURE
HENNEPIN, ILLINOIS**

DRAWN BY: MSK	CHECKED BY: DRAFT	APPROVED BY: DRAFT
DATE: 01/15/2020	DWG SCALE: 1"=50'	PROJECT NO: 192-860.0001
DRAWING NO.:		1
SHEET 1 OF 1		

**COAL PILE PRECONSTRUCTION TOPO
FIELD SURVEY JANUARY 13 & 14, 2020**

Appendix D
Hydrology





1. FLOW VALUES ARE AVERAGED FOR THE REACH
 BETWEEN THE GAGES
 2. STRAIGHT LINE BETWEEN THE GAGES

U.S. ARMY CORPS OF ENGINEERS
 2004 FLOW FREQUENCY STUDY
 APPENDIX C
 ILLINOIS RIVER
 FLOOD PROFILES- N.G.V.D. 1929
 ROCK ISLAND DISTRICT
 2. 5, 10, 25, 50, 100, 200, & 500 YEAR FLOOD
 &
 1982 HISTORIC FLOOD
 RIVER MILES 247.0 TO 180.3
 PLATE # 2

Flow Frequency Query

Upper Mississippi River
United States Army Corps of Engineers
Mississippi Valley Division
Developed by Rock Island District

[\[Disclaimers\]](#) [\[Help\]](#)

River:

Illinois River ▼

Datum:

1929 ▼

Return Period:

2-year ▼

River Mile:

211.4

Flow: 67,000 CFS

Surface Elevation: 452.4 Ft

Located in the pool of Peoria Lock and Dam

[Download PDF for a profile plot in the vicinity of the River Mile selection.](#)

Or Select a Pool Reach*

Select a PDF Plate of Pool ▼

**Pool Reach PDF's are only available for the pools for the Mississippi and Illinois Rivers. All downloadable PDF Plates are about 600 kb.*

[\[Datasources\]](#)

River Locations of Interest

Illinois River ▼

Location	River Mile
Brandon Road L&D	285.9
Dresden Island L&D	271.5
Morris, IL	263.1
Marseilles, IL	246.5
Marseilles L&D	244.5
Starved Rock L&D	231.1
La Salle, IL	224.7
Henry, IL	196.0
Peoria, IL	164.6
Peoria L&D	157.9
Kingston Mines, IL	145.4
Copperas Creek, IL	136.8
Beardstown, IL	88.6
New LaGrange L&D	80.2
Meredosia, IL	70.8
Valley City, IL	61.3
Florence, IL	56.0
Hardin, IL	21.5

Flow Frequency Query

Upper Mississippi River
United States Army Corps of Engineers
Mississippi Valley Division
Developed by Rock Island District

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River:

Illinois River ▼

Datum:

1929 ▼

Return Period:

5-year ▼

River Mile:

211.4

Flow: 95,000 CFS

Surface Elevation: 455.2 Ft

Located in the pool of Peoria Lock and Dam

[Download PDF for a profile plot in the vicinity of the River Mile selection.](#)

Or Select a Pool Reach*

Select a PDF Plate of Pool ▼

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[\[Datasources\]](#)

River Locations of Interest

Illinois River ▼

Location	River Mile
Brandon Road L&D	285.9
Dresden Island L&D	271.5
Morris, IL	263.1
Marseilles, IL	246.5
Marseilles L&D	244.5
Starved Rock L&D	231.1
La Salle, IL	224.7
Henry, IL	196.0
Peoria, IL	164.6
Peoria L&D	157.9
Kingston Mines, IL	145.4
Copperas Creek, IL	136.8
Beardstown, IL	88.6
New LaGrange L&D	80.2
Meredosia, IL	70.8
Valley City, IL	61.3
Florence, IL	56.0
Hardin, IL	21.5

Flow Frequency Query

Upper Mississippi River
United States Army Corps of Engineers
Mississippi Valley Division
Developed by Rock Island District

[\[Disclaimers\]](#) [\[Help\]](#)

River:

Illinois River ▼

Datum:

1929 ▼

Return Period:

10-year ▼

River Mile:

211.4

Flow: 114,000 CFS

Surface Elevation: 456.9 Ft

Located in the pool of Peoria Lock and Dam

[Download PDF for a profile plot in the vicinity of the River Mile selection.](#)

Or Select a Pool Reach*

Select a PDF Plate of Pool ▼

**Pool Reach PDF's are only available for the pools for the Mississippi and Illinois Rivers. All downloadable PDF Plates are about 600 kb.*

[\[Datasources\]](#)

River Locations of Interest

Illinois River ▼

Location	River Mile
Brandon Road L&D	285.9
Dresden Island L&D	271.5
Morris, IL	263.1
Marseilles, IL	246.5
Marseilles L&D	244.5
Starved Rock L&D	231.1
La Salle, IL	224.7
Henry, IL	196.0
Peoria, IL	164.6
Peoria L&D	157.9
Kingston Mines, IL	145.4
Copperas Creek, IL	136.8
Beardstown, IL	88.6
New LaGrange L&D	80.2
Meredosia, IL	70.8
Valley City, IL	61.3
Florence, IL	56.0
Hardin, IL	21.5

Flow Frequency Query

Upper Mississippi River
United States Army Corps of Engineers
Mississippi Valley Division
Developed by Rock Island District

[\[Disclaimers\]](#) [\[Help\]](#)

River:

Illinois River ▼

Datum:

1929 ▼

Return Period:

25-year ▼

River Mile:

211.4

Flow: 136,000 CFS

Surface Elevation: 459.3 Ft

Located in the pool of Peoria Lock and Dam

[Download PDF for a profile plot in the vicinity of the River Mile selection.](#)

Or Select a Pool Reach*

Select a PDF Plate of Pool ▼

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[\[Datasources\]](#)

River Locations of Interest

Illinois River ▼

Location	River Mile
Brandon Road L&D	285.9
Dresden Island L&D	271.5
Morris, IL	263.1
Marseilles, IL	246.5
Marseilles L&D	244.5
Starved Rock L&D	231.1
La Salle, IL	224.7
Henry, IL	196.0
Peoria, IL	164.6
Peoria L&D	157.9
Kingston Mines, IL	145.4
Copperas Creek, IL	136.8
Beardstown, IL	88.6
New LaGrange L&D	80.2
Meredosia, IL	70.8
Valley City, IL	61.3
Florence, IL	56.0
Hardin, IL	21.5

Flow Frequency Query

Upper Mississippi River
United States Army Corps of Engineers
Mississippi Valley Division
Developed by Rock Island District

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River:

Illinois River ▼

Datum:

1929 ▼

Return Period:

50-year ▼

River Mile:

211.4

Flow: 153,000 CFS

Surface Elevation: 460.6 Ft

Located in the pool of Peoria Lock and Dam

[Download PDF for a profile plot in the vicinity of the River Mile selection.](#)

Or Select a Pool Reach*

Select a PDF Plate of Pool ▼

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[\[Datasources\]](#)

River Locations of Interest

Illinois River ▼

Location	River Mile
Brandon Road L&D	285.9
Dresden Island L&D	271.5
Morris, IL	263.1
Marseilles, IL	246.5
Marseilles L&D	244.5
Starved Rock L&D	231.1
La Salle, IL	224.7
Henry, IL	196.0
Peoria, IL	164.6
Peoria L&D	157.9
Kingston Mines, IL	145.4
Copperas Creek, IL	136.8
Beardstown, IL	88.6
New LaGrange L&D	80.2
Meredosia, IL	70.8
Valley City, IL	61.3
Florence, IL	56.0
Hardin, IL	21.5

Flow Frequency Query

Upper Mississippi River
United States Army Corps of Engineers
Mississippi Valley Division
Developed by Rock Island District

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River:

Illinois River ▼

Datum:

1929 ▼

Return Period:

100-year ▼

River Mile:

211.4

Flow: 169,000 CFS

Surface Elevation: 462.1 Ft

Located in the pool of Peoria Lock and Dam

[Download PDF for a profile plot in the vicinity of the River Mile selection.](#)

Or Select a Pool Reach*

Select a PDF Plate of Pool ▼

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[\[Datasources\]](#)

River Locations of Interest

Illinois River ▼

Location	River Mile
Brandon Road L&D	285.9
Dresden Island L&D	271.5
Morris, IL	263.1
Marseilles, IL	246.5
Marseilles L&D	244.5
Starved Rock L&D	231.1
La Salle, IL	224.7
Henry, IL	196.0
Peoria, IL	164.6
Peoria L&D	157.9
Kingston Mines, IL	145.4
Copperas Creek, IL	136.8
Beardstown, IL	88.6
New LaGrange L&D	80.2
Meredosia, IL	70.8
Valley City, IL	61.3
Florence, IL	56.0
Hardin, IL	21.5

Flow Frequency Query

Upper Mississippi River
United States Army Corps of Engineers
Mississippi Valley Division
Developed by Rock Island District

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River:

Illinois River ▼

Datum:

1929 ▼

Return Period:

200-year ▼

River Mile:

211.4

Flow: 185,000 CFS

Surface Elevation: 463.5 Ft

Located in the pool of Peoria Lock and Dam

[Download PDF for a profile plot in the vicinity of the River Mile selection.](#)

Or Select a Pool Reach*

Select a PDF Plate of Pool ▼

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[\[Datasources\]](#)

River Locations of Interest

Illinois River ▼

Location	River Mile
Brandon Road L&D	285.9
Dresden Island L&D	271.5
Morris, IL	263.1
Marseilles, IL	246.5
Marseilles L&D	244.5
Starved Rock L&D	231.1
La Salle, IL	224.7
Henry, IL	196.0
Peoria, IL	164.6
Peoria L&D	157.9
Kingston Mines, IL	145.4
Copperas Creek, IL	136.8
Beardstown, IL	88.6
New LaGrange L&D	80.2
Meredosia, IL	70.8
Valley City, IL	61.3
Florence, IL	56.0
Hardin, IL	21.5

Flow Frequency Query

*Upper Mississippi River
United States Army Corps of Engineers
Mississippi Valley Division
Developed by Rock Island District*

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River:

Illinois River ▼

Datum:

1929 ▼

Return Period:

500-year ▼

River Mile:

211.4

Flow: 201,000 CFS

Surface Elevation: 464.8 Ft

Located in the pool of Peoria Lock and Dam

[Download PDF for a profile plot in the vicinity of the River Mile selection.](#)

Or Select a Pool Reach*

Select a PDF Plate of Pool ▼

**Pool Reach PDF's are only available for the pools for the Mississippi and Illinois Rivers. All downloadable PDF Plates are about 600 kb.*

[\[Datasources\]](#)

River Locations of Interest

Illinois River ▼

Location	River Mile
Brandon Road L&D	285.9
Dresden Island L&D	271.5
Morris, IL	263.1
Marseilles, IL	246.5
Marseilles L&D	244.5
Starved Rock L&D	231.1
La Salle, IL	224.7
Henry, IL	196.0
Peoria, IL	164.6
Peoria L&D	157.9
Kingston Mines, IL	145.4
Copperas Creek, IL	136.8
Beardstown, IL	88.6
New LaGrange L&D	80.2
Meredosia, IL	70.8
Valley City, IL	61.3
Florence, IL	56.0
Hardin, IL	21.5

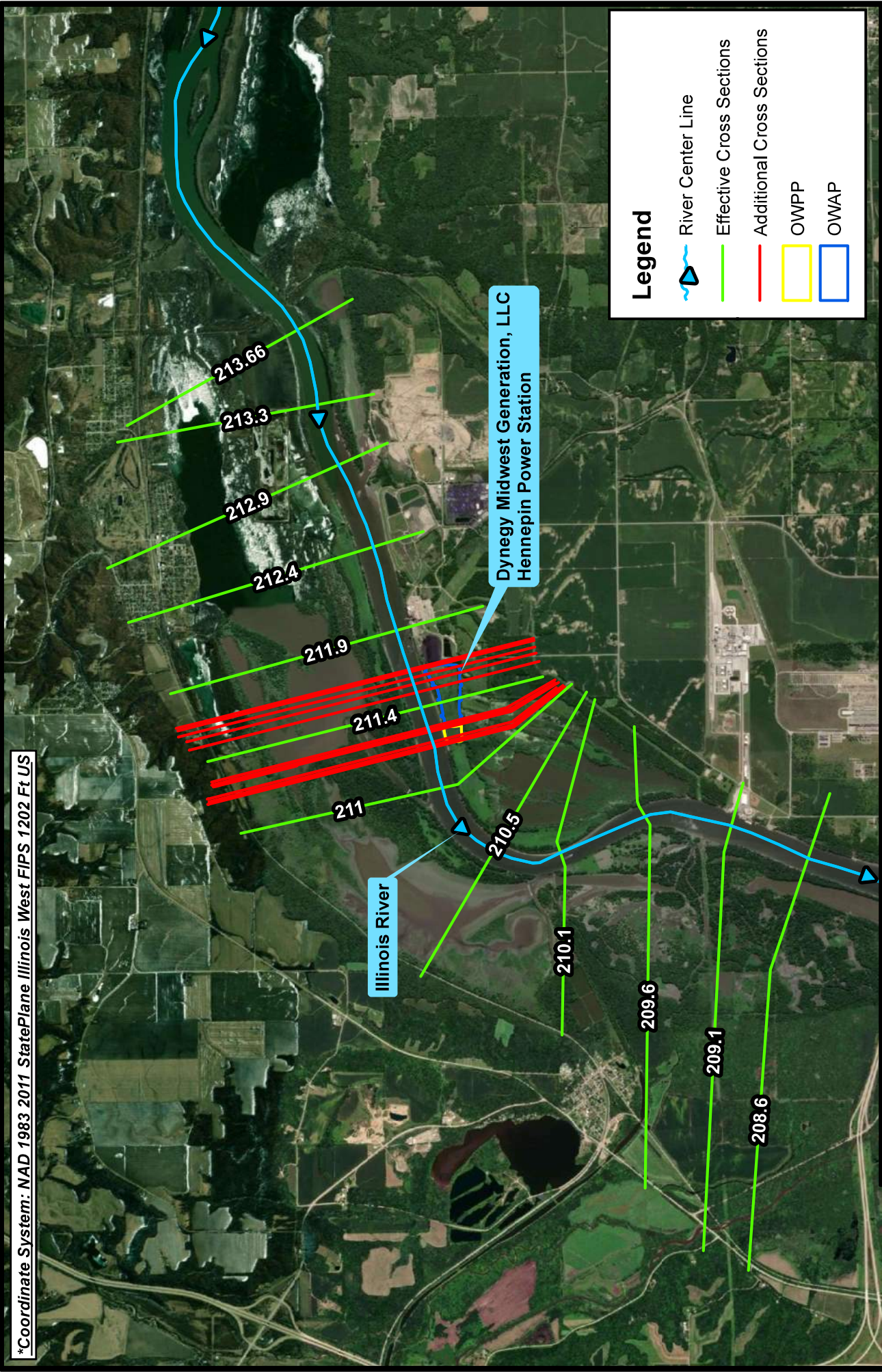
FEMA FIS Interpolated Flows (cfs)

River Mile	Flood Frequency (yr)			
	10	50	100	500
157.7	66,000	82,000	90,000	111,000
231.1	94,000	125,000	137,000	164,000
Interpolated Flows				
211.4	86,485	113,459	124,386	149,775

Appendix E
Hydraulic Cross-Section Maps



*Coordinate System: NAD 1983 2011 StatePlane Illinois West FIPS 1202 Ft US



Legend

- River Center Line
- Effective Cross Sections
- Additional Cross Sections
- OWPP
- OWAP

Cross-Section Map

Dynegy Midwest Generation, LLC
 Hennepin Power Station
 Putnam County, Illinois

Job Number: 19E0096B



0 2,000 4,000 8,000 Feet






1 in = 4,000 feet

*Coordinate System: NAD 1983 2011 StatePlane Illinois West FIPS 1202 Ft US

Dynergy Midwest Generation, LLC
Hennepin Power station

Illinois River

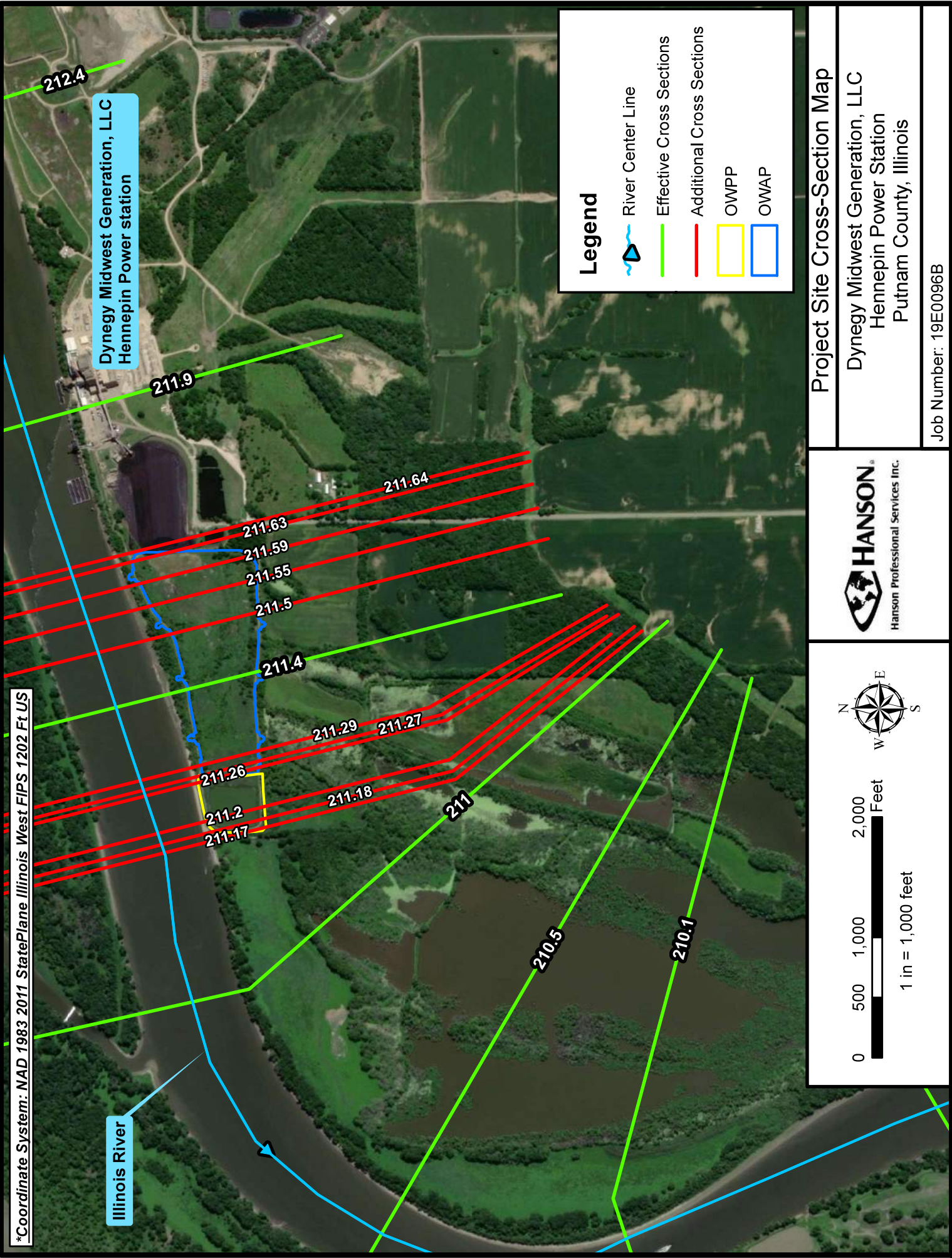
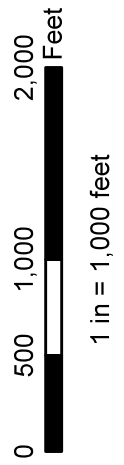
Legend

-  River Center Line
-  Effective Cross Sections
-  Additional Cross Sections
-  OWPP
-  OWAP

Project Site Cross-Section Map

Dynergy Midwest Generation, LLC
Hennepin Power Station
Putnam County, Illinois

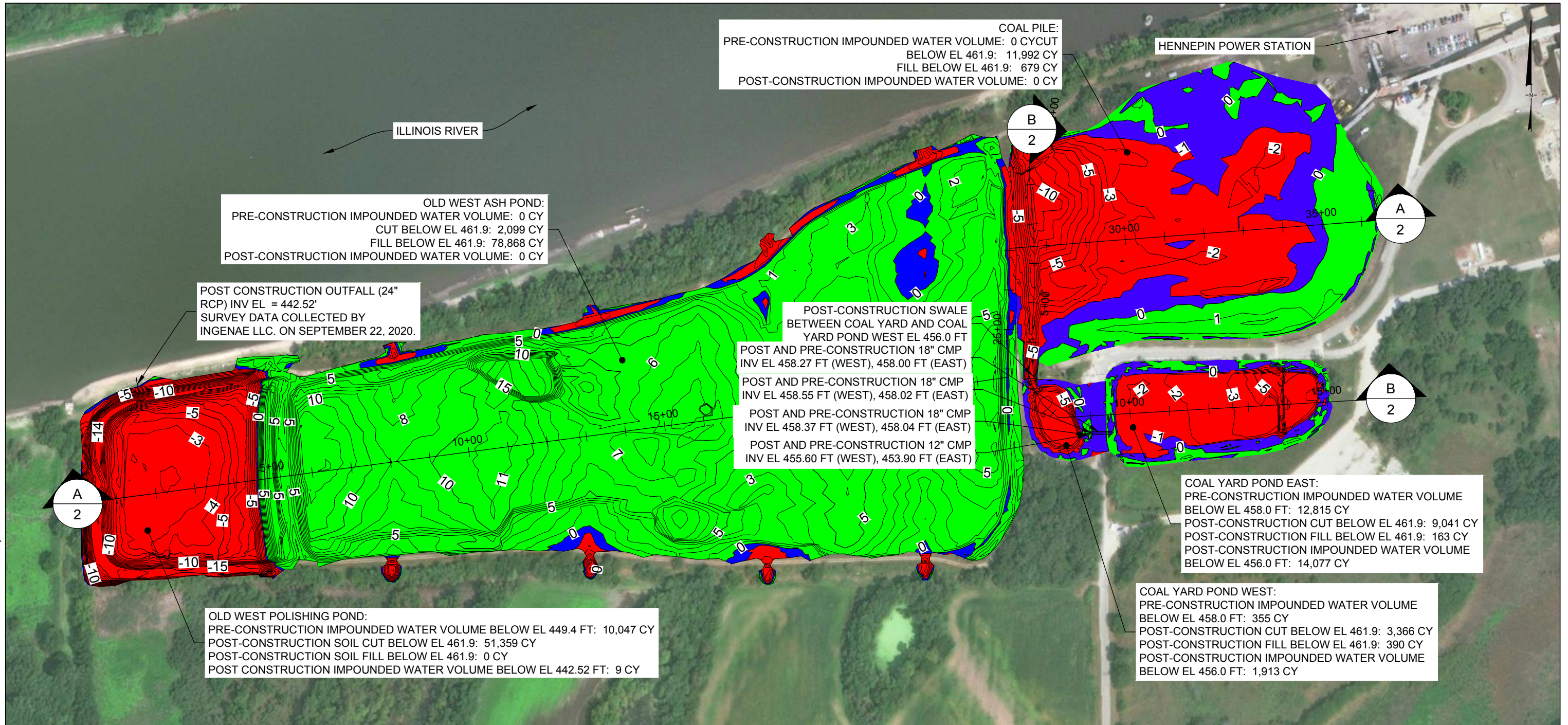
Job Number: 19E0096B



Appendix F
Proposed Site Plans



L:\CADD\IDYNEGYHENNEPIN\CLOSURE DESIGN - CHE8356B\BIVOLUMES\CHE8356B-V002 - Last Saved by: SNichols on 10/14/20



COAL PILE:
 PRE-CONSTRUCTION IMPOUNDED WATER VOLUME: 0 CY
 CUT BELOW EL 461.9: 11,992 CY
 FILL BELOW EL 461.9: 679 CY
 POST-CONSTRUCTION IMPOUNDED WATER VOLUME: 0 CY

OLD WEST ASH POND:
 PRE-CONSTRUCTION IMPOUNDED WATER VOLUME: 0 CY
 CUT BELOW EL 461.9: 2,099 CY
 FILL BELOW EL 461.9: 78,868 CY
 POST-CONSTRUCTION IMPOUNDED WATER VOLUME: 0 CY

POST CONSTRUCTION OUTFALL (24" RCP) INV EL = 442.52'
 SURVEY DATA COLLECTED BY INGENAE LLC. ON SEPTEMBER 22, 2020.

POST-CONSTRUCTION SWALE BETWEEN COAL YARD AND COAL YARD POND WEST EL 456.0 FT
 POST AND PRE-CONSTRUCTION 18" CMP INV EL 458.27 FT (WEST), 458.00 FT (EAST)
 POST AND PRE-CONSTRUCTION 18" CMP INV EL 458.55 FT (WEST), 458.02 FT (EAST)
 POST AND PRE-CONSTRUCTION 18" CMP INV EL 458.37 FT (WEST), 458.04 FT (EAST)
 POST AND PRE-CONSTRUCTION 12" CMP INV EL 455.60 FT (WEST), 453.90 FT (EAST)

COAL YARD POND EAST:
 PRE-CONSTRUCTION IMPOUNDED WATER VOLUME BELOW EL 458.0 FT: 12,815 CY
 POST-CONSTRUCTION CUT BELOW EL 461.9: 9,041 CY
 POST-CONSTRUCTION FILL BELOW EL 461.9: 163 CY
 POST-CONSTRUCTION IMPOUNDED WATER VOLUME BELOW EL 456.0 FT: 14,077 CY

OLD WEST POLISHING POND:
 PRE-CONSTRUCTION IMPOUNDED WATER VOLUME BELOW EL 449.4 FT: 10,047 CY
 POST-CONSTRUCTION SOIL CUT BELOW EL 461.9: 51,359 CY
 POST-CONSTRUCTION SOIL FILL BELOW EL 461.9: 0 CY
 POST CONSTRUCTION IMPOUNDED WATER VOLUME BELOW EL 442.52 FT: 9 CY

COAL YARD POND WEST:
 PRE-CONSTRUCTION IMPOUNDED WATER VOLUME BELOW EL 458.0 FT: 355 CY
 POST-CONSTRUCTION CUT BELOW EL 461.9: 3,366 CY
 POST-CONSTRUCTION FILL BELOW EL 461.9: 390 CY
 POST-CONSTRUCTION IMPOUNDED WATER VOLUME BELOW EL 456.0 FT: 1,913 CY

NOTES:

1. THE 100-YEAR FLOOD ELEVATION FOR THE SITE IS EL. 461.9 FT, PER THE FEMA FLOOD INSURANCE STUDY FOR PUTNAM COUNTY, ILLINOIS (17155CV000A, DATED FEBRUARY 2011).
2. CUT CONTOURS, ZERO CONTOURS, AND FILL CONTOURS REFER TO THE DIFFERENCE BETWEEN PRE-CONSTRUCTION GRADES AND FINAL AS-BUILT GRADES.
3. COMPOSITE PRE-CONSTRUCTION AND POST-CONSTRUCTION SURVEY GRADES ARE SHOWN ON FIGURES 2 AND 3.
4. SURVEY DATA USED TO CREATE THIS FIGURE WAS COLLECTED IN THE NAD83 HORIZONTAL DATUM AND THE NAVD88 VERTICAL DATUM.
5. THE BACKGROUND AERIAL IMAGE WAS OBTAINED FROM GOOGLE EARTH AND WAS COLLECTED ON SEPTEMBER 20, 2015.

LEGEND

- 1 CUT CONTOURS
- 0 ZERO CONTOURS
- 1 FILL CONTOURS



DRAFT

SUMMARY OF CUT AND FILL VOLUMES
 BELOW ELEVATION 461.9 FT
 HENNEPIN POWER STATION
 WEST ASH POND SYSTEM CLOSURE

Geosyntec
 consultants

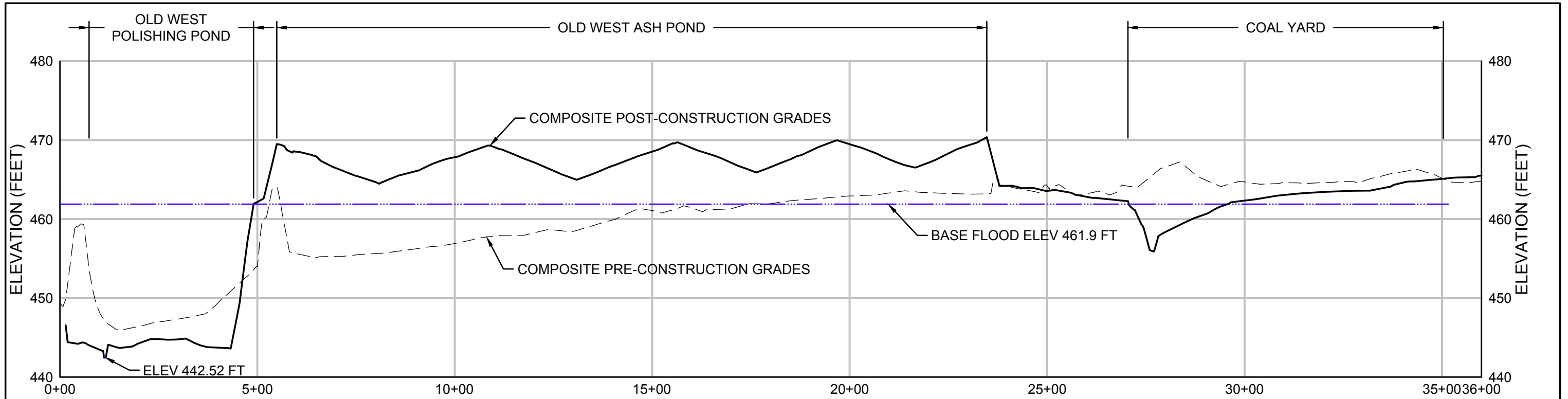
FIGURE

1

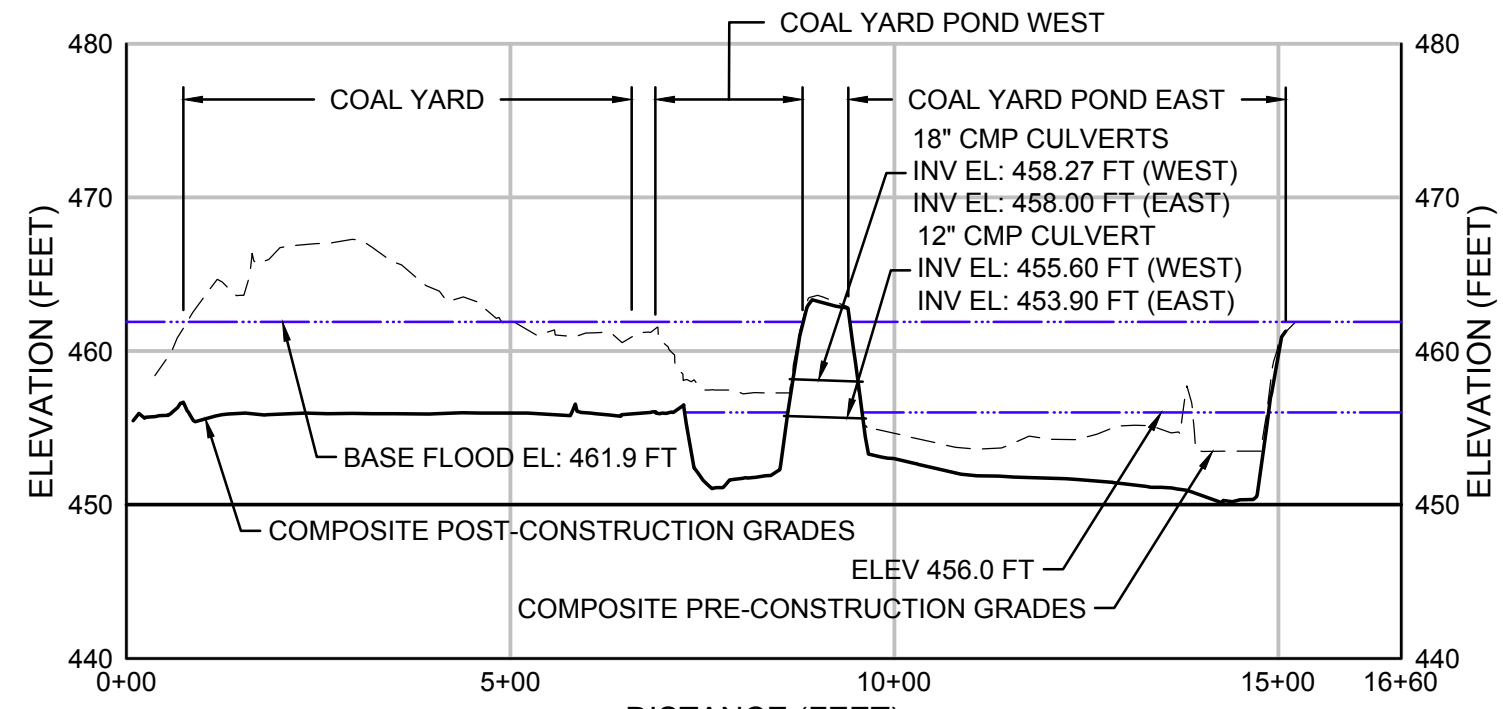
PROJECT NO: CHE8400

OCTOBER 2020

L:\CADD\IDYNE\HENNEPIN\CLOSURE DESIGN - CHE8356B\10\14\20 - Last Saved by: SNichols on 10/14/20



A
SECTION
WEST TO EAST
SCALE: 1" = 250' (HORIZONTAL)



B
SECTION
NORTH TO SOUTH
SCALE: 1" = 250' (HORIZONTAL)



CROSS SECTIONS
HENNEPIN POWER STATION
WEST ASH POND SYSTEM CLOSURE

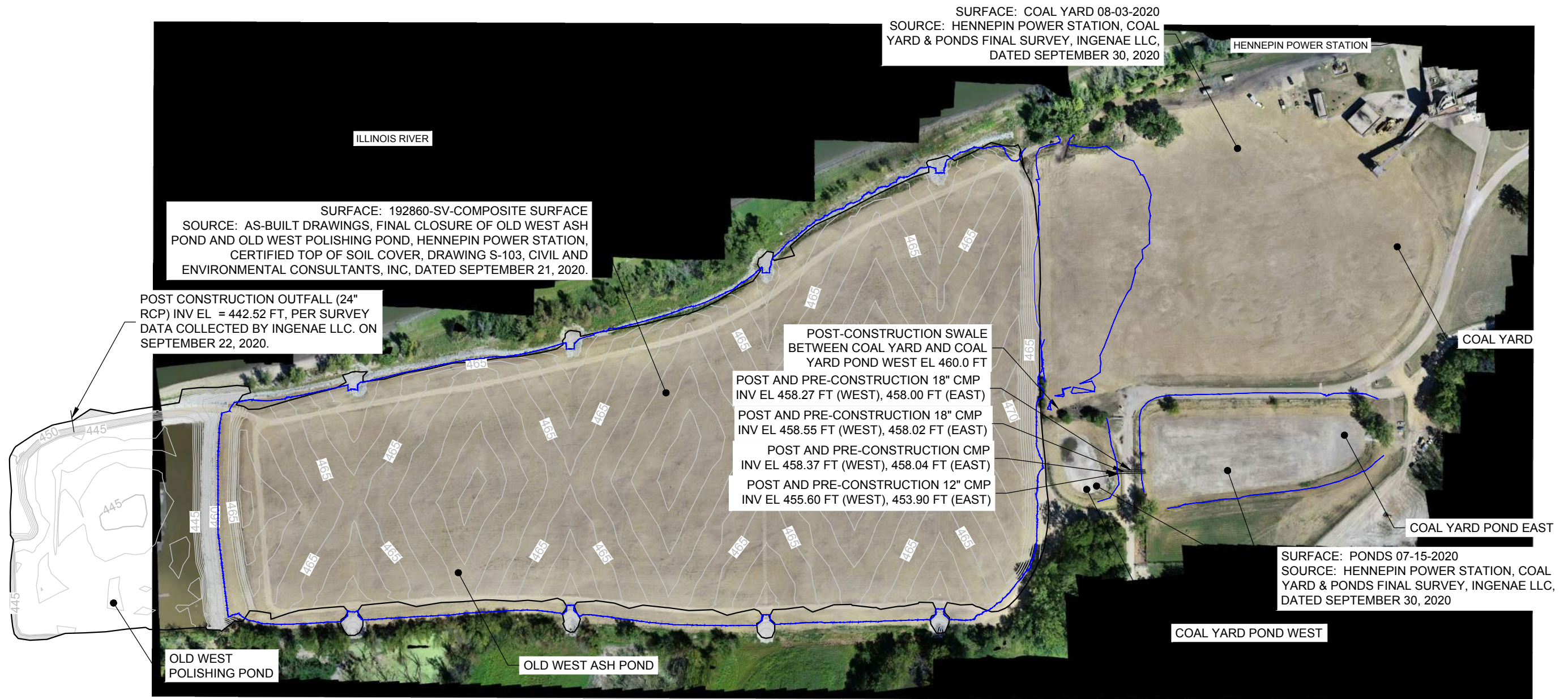
Geosyntec
consultants

PROJECT NO: CHE8400 | OCTOBER 2020

FIGURE
2

DRAFT

L:\CADD\IDYNE\HENNEPIN\CLOSURE DESIGN - CHE8356B\VOLUMES\CHE8356B-X002 - COMBINED FG TOPO SURFACES - Last Saved by: SNichols on 10/11/20



NOTES:

1. TOPOGRAPHIC SURVEY DATA WAS COLLECTED BY MULTIPLE SURVEYORS ON MULTIPLE DATES AND MERGED INTO A COMPOSITE POST-CONSTRUCTION TOPOGRAPHIC SURFACE FOR THE AREAS INDICATED ON THIS DRAWING.
2. SURVEY DATA USED TO CREATE THIS FIGURE WAS COLLECTED IN THE NAD83 HORIZONTAL DATUM AND THE NAVD88 VERTICAL DATUM.
3. THE BACKGROUND AERIAL IMAGE WAS PROVIDED BY RYAN CENTRAL, INCORPORATED, AND COLLECTED ON JULY 23, 2020.

LEGEND

- 465 — SURFACE ELEVATIONS
- SURVEY BOUNDARY
- LIMITS OF BASE FLOOD ELEVATION 461.9 FT



COMPOSITE POST-CONSTRUCTION GRADES
 HENNEPIN POWER STATION
 WEST ASH POND SYSTEM CLOSURE



FIGURE

3

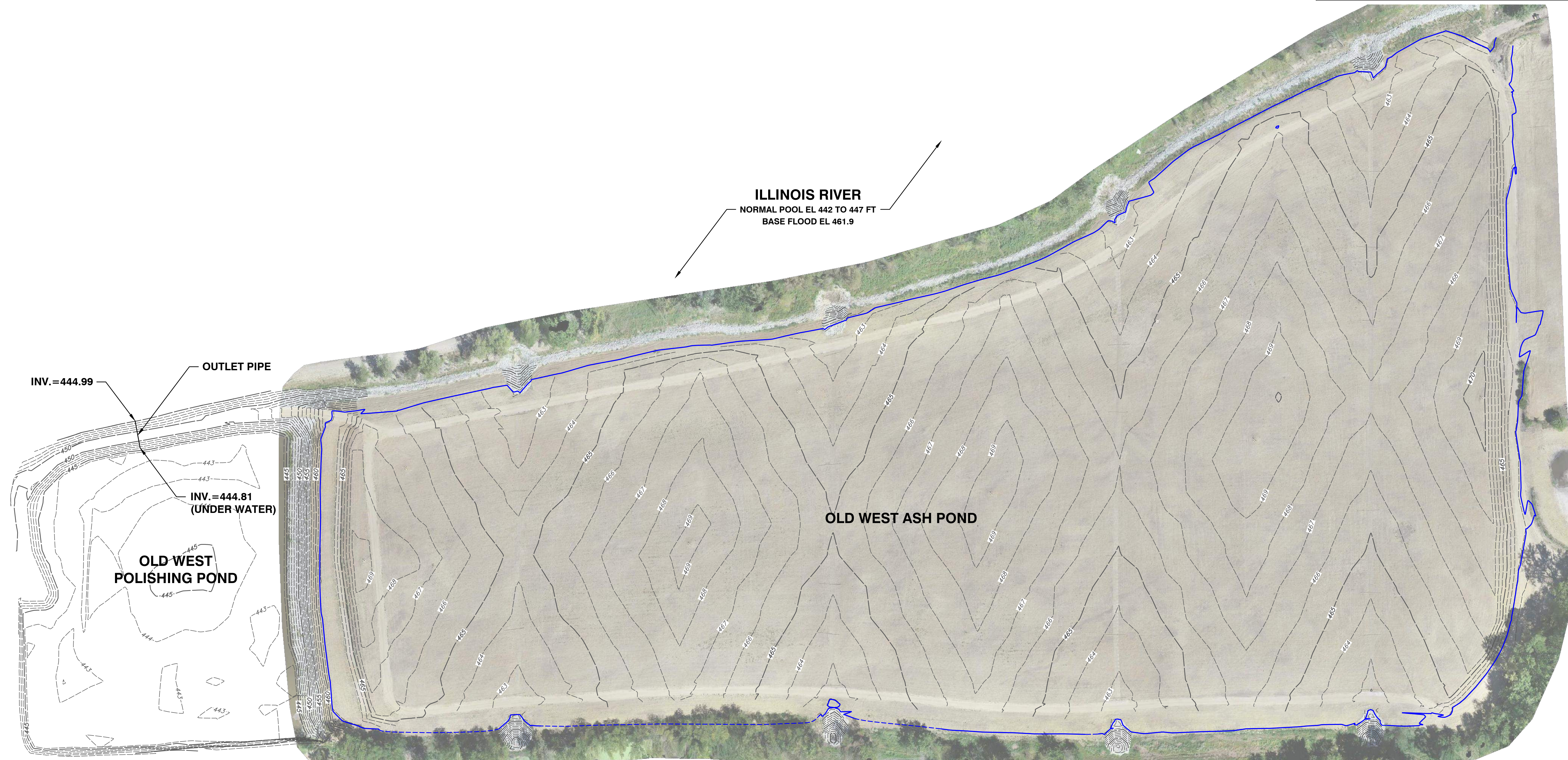
PROJECT NO: CHE8400 | OCTOBER 2020

DRAFT



REVISION RECORD		
NO	DATE	DESCRIPTION
1	10/08/2020	REVISE PER GEOSYNTEC REVIEW

SUBMITTAL RECORD		
NO	DATE	DESCRIPTION



P:\2019\192-861-Survey\Draw\192-861-103-Certified Soil Cover.dwg - UF: 10/9/2020 11:59 AM
 P:\2019\192-861-Survey\Draw\192-861-103-Certified Soil Cover.dwg - UF: 10/9/2020 11:59 AM

- GENERAL NOTES**
1. BASE FLOOD ELEVATION BASED ON COMPOSITE SURFACE OF MAY 29, 2020 MONTHLY FIELD DATA TOPOGRAPHY TIED INTO AUGUST 4, 2020 TOP OF SOL COVER TOPOGRAPHY.
 2. MAP IS BASED ON ILLINOIS STATE PLANE WEST ZONE.
 3. ALL ELEVATIONS ARE REFERENCED TO THE VRS NETWORK NAVD 88 VERTICAL DATUM.

- REFERENCE**
1. AERIAL IMAGE PROVIDED COURTESY OF RYAN INCORPORATED CENTRAL, JANESVILLE, WISCONSIN.

LEGEND

----- 462 -----	CERTIFIED 1 FOOT SOIL COVER CONTOUR
----- 465 -----	CERTIFIED 5 FOOT SOIL COVER CONTOUR
----- 461.9 -----	LIMITS OF BASE FLOOD ELEVATION 461.9
----- 461.9 -----	APPROXIMATE LOCATION OF BASE FLOOD ELEVATION 461.9

SURVEYOR'S CERTIFICATE

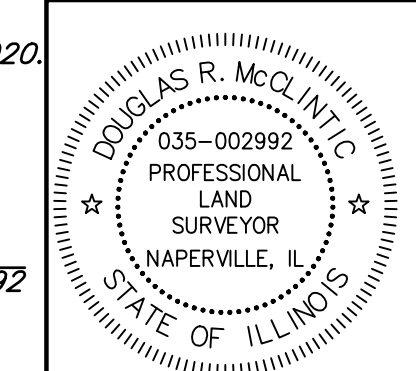
STATE OF ILLINOIS }
 COUNTY OF DUPAGE } SS

I HEREBY CERTIFY THAT THIS PLAT, AND THE SURVEY UPON WHICH IT IS BASED, HAS BEEN PREPARED UNDER MY DIRECT SUPERVISION. ALL DISTANCES ARE GIVEN IN FEET AND DECIMALS THEREOF.

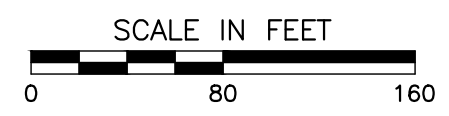
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FIELDWORK WAS COMPLETED ON MAY 29, 2020.
 GIVEN UNDER MY HAND AND SEAL THIS 9TH DAY OF OCTOBER, 2020.

Donlas R. McClinton



ILLINOIS LICENSED PROFESSIONAL LAND SURVEYOR NO. 035-002992
 LICENSED VALID THROUGH NOVEMBER 30, 2020



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Civil & Environmental Consultants, Inc.

1230 East Diehl Road, Suite 200 - Naperville, IL 60563
 Ph: 630.963.6026 · 877.963.6026 · Fax: 630.963.6027
 www.cecinc.com

**AS-BUILT DRAWINGS
 FINAL CLOSURE OF OLD WEST ASH POND
 AND OLD WEST POLISHING POND
 HENNEPIN POWER STATION**

DRAWN BY: MSK	CHECKED BY: DRM	APPROVED BY: DRAFT
DATE: 09/25/2020	DWG SCALE: 1"=80'	PROJECT NO: 192-860.0001

CERTIFIED FINAL GRADES

DRAWING NO.: **S-103**
 SHEET 3 OF 17

HENNEPIN POWER STATION

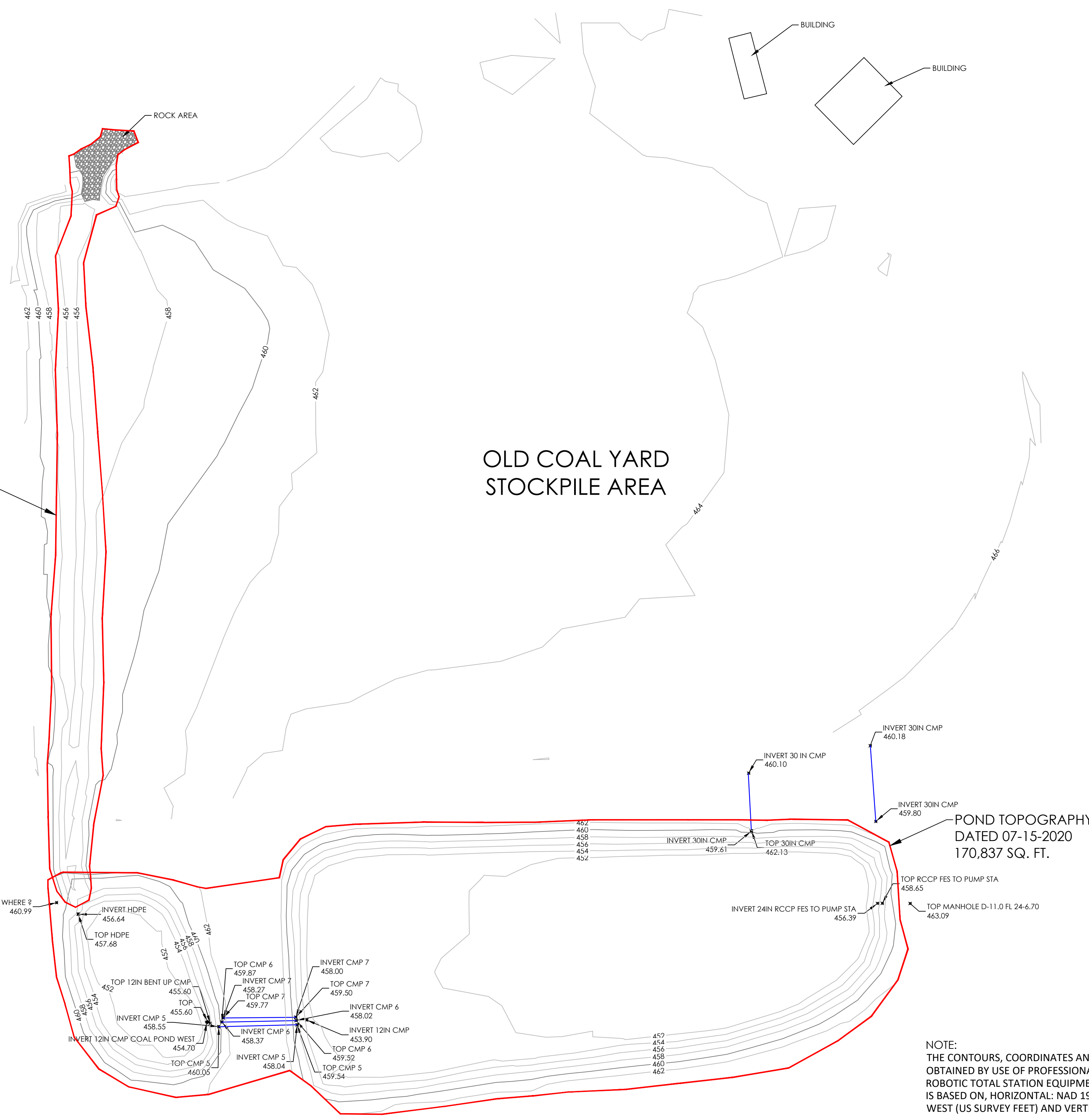
OLD COAL YARD STOCK AREA 08-03-2020

COAL YARD SETTLEMENT POND AREA 07-15-2020

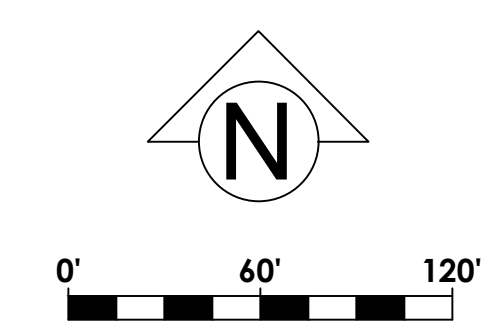
DITCH SURVEY 09-22-2020



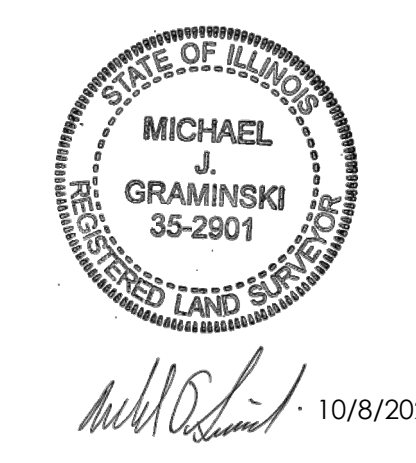
SITE LOCATION MAP
N.T.S.



NOTE:
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Submissions / Revisions:	Date:
1 REVISED	9/25/20
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Project Name & Location:
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COAL YARD & PONDS FINAL SURVEY

Date: 10/13/2020	Project No.
Type: SITE	Drawing No. 1
Drawn By: CB	
Approved By: MG	
Scale: AS NOTED	

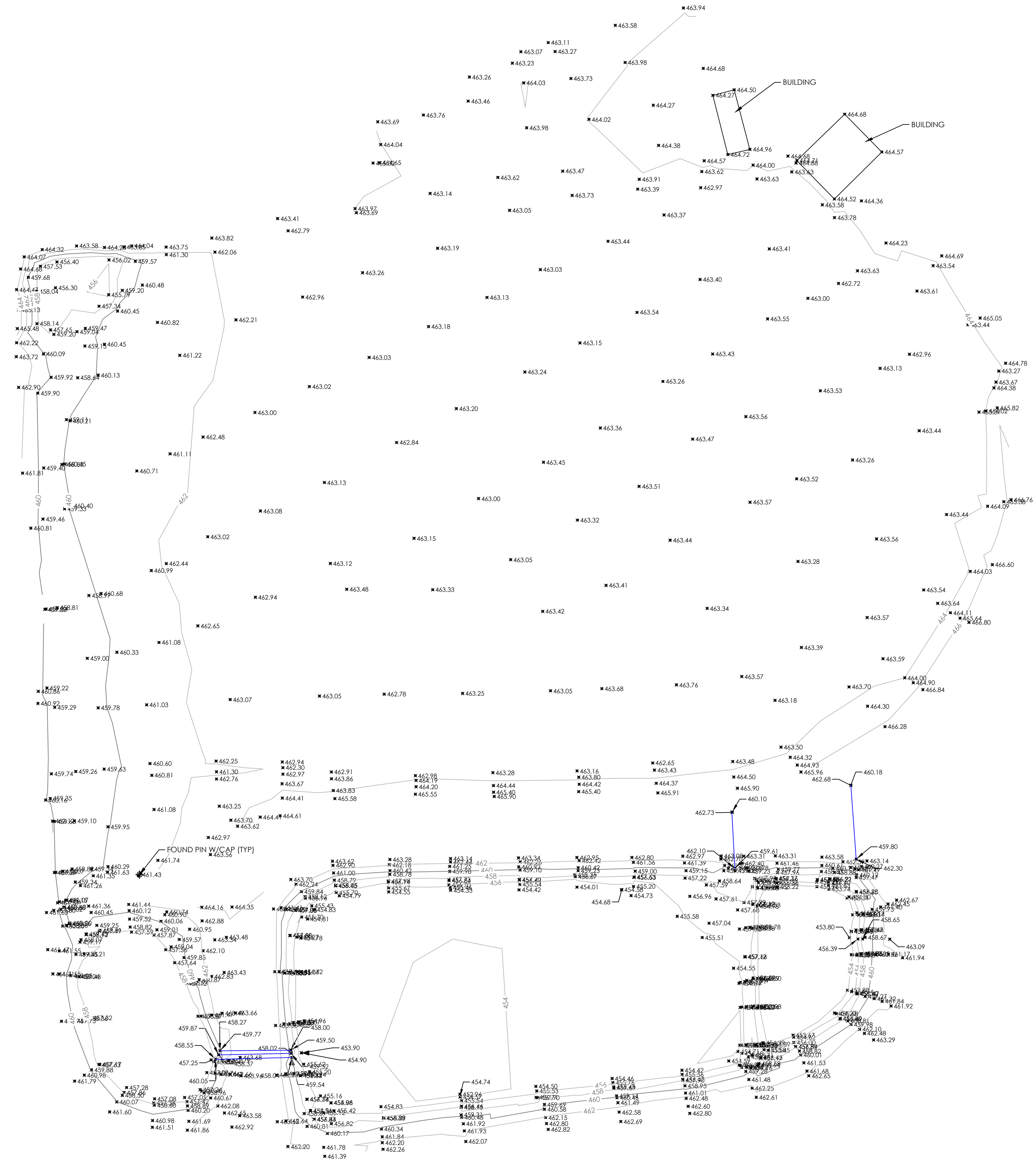
HENNEPIN POWER STATION

OLD COAL YARD STOCK AREA AND STORM WATER RUN-OFF COLLECTION POND SURVEY



SITE LOCATION MAP

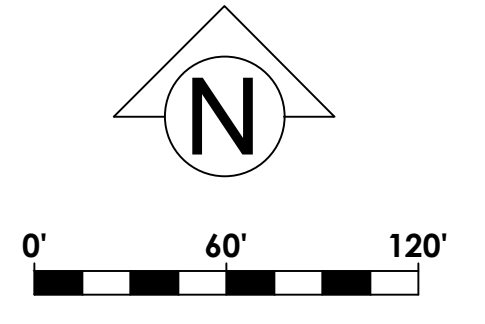
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MICHAEL J. GRAMINSKI
 IPLS NO. 035-2901 DATE _____



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Drawing Name:
**COAL YARD
 AND PONDS
 ORIGINAL SURVEY**

Date:	Project No.
7/17/2020	
Type:	Drawing No.
SITE	
Drawn By:	1
CB	
Approved By:	
MG	
Scale:	
AS NOTED	



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Burns & McDonnell World Headquarters
9400 Ward Parkway
Kansas City, MO 64114
O 816-333-9400
F 816-333-3690
www.burnsmcd.com

Memorandum



Date: 25 October 2021

Subject: 35 I.A.C. Admin. Code Part 845 - Wetland Location Demonstration for East Ash Pond at Hennepin Power Plant

Dynegy Midwest Generation, LLC (DMG) operates the coal-fired Hennepin Power Plant located in Putnam County, Illinois. The East Ash Pond is an existing surface impoundment storing coal combustion residuals (CCR). The requirements for the East Ash Pond are found in 35 Ill. Admin. Code (I.A.C.) 845 (Part 845).

This memorandum addresses the requirements of Section 845.310 Wetlands, which states:

Section 845.310 Wetlands

- a) *Existing and new CCR surface impoundments, and all lateral expansions of CCR surface impoundments must not be located in wetlands unless the owner or operator demonstrates [that the requirements listed in 845.310(a)(1) through (5) are met.]*
- b) *The owner or operator of the CCR surface impoundment must obtain a certification from a qualified professional engineer stating that the demonstration meets the requirements of subsection (a).*

Pursuant to Section 845.210(d)(2), for existing CCR surface impoundments, the owner or operator of the CCR surface impoundment may use a previously completed location restriction demonstration required by Section 845.300 (Placement Above the Uppermost Aquifer), Section 845.310 (Wetlands), Section 845.320 (Fault Areas), Section 845.330 (Seismic Impact Zones), and Section 845.340 (Unstable Areas), provided that the previously completed assessments meet the applicable requirements of those Sections.

The previous wetlands demonstration was certified by a qualified professional engineer stating that the demonstration meets the requirements of 40 C.F.R. § 257.61. The requirements described in 40 C.F.R. § 257.61 are nearly identical to the requirements contained in I.A.C. Section 845.310. Pursuant to Section 845.210(d)(2), a certification is not required for this demonstration. The previously completed wetlands demonstration is included in Attachment D.



HALEY & ALDRICH, INC.
6500 Rockside Road
Suite 200
Cleveland, OH 44131
216.739.0555

MEMORANDUM

16 October 2018

File No. 129788

SUBJECT: Location Restriction Demonstration - Wetland Areas
Hennepin Power Station
East Ash Pond
Hennepin, Illinois

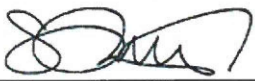
Dynergy Midwest Generation, LLC operates the coal-fired Hennepin Power Station (Plant) located near Hennepin, Illinois. The East Ash Pond (Unit) is an existing coal combustion residuals (CCR) surface impoundment. This demonstration addresses the requirements of 40 CFR §257.61 (*Wetlands*) of the U.S. Environmental Protection Agency's (EPA) rule entitled *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities*. 80 Fed. Reg. 21,302 (Apr. 17, 2015) (promulgating 40 CFR §257.61); 83 Fed. Reg. 36,435 (July 30, 2018) (amending 40 CFR §257.61).

§257.61(a): New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located in wetlands, as defined in §232.2 of this chapter, unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that the CCR unit meets the requirements of paragraphs (a)(1) through (5) of this section.

Based on a review of the U.S. Fish and Wildlife Service's National Wetland Inventory mapping, 0.5-meter resolution aerial imagery (2016) and the results of on-site field assessments, the Unit is not located in wetlands as defined by 40 CFR §232.2.

§257.61(b): The owner or operator of the CCR unit must obtain a certification from a qualified professional engineers or approval from the Participating State Director or approval from EPA where EPA is the permitting authority stating that the demonstration meets the requirements of paragraph (a) of this section.

I, Steven F. Putrich, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief, that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the CCR Unit is not located in wetlands as included in the CCR Rule Location Restrictions Evaluation memorandum dated 12 October 2018 and, therefore, meets the requirements of 40 CFR §257.61(a).

Signed: 
Consulting Engineer

Print Name: Steven F. Putrich
Illinois License No.: 62048779
Title: Vice President
Company: Haley & Aldrich, Inc.

Professional Engineer's Seal:



ATTACHMENT E

HENNEPIN
EAST NEW PRIMARY POND

ID #: W1550100002-05

• DYNEGY MIDWEST
GENERATION, LLC

ATTACHMENT F

Dynegy Midwest Generation, LLC

HENNEPIN POWER PLANT
VILLAGE OF HENNEPIN, PUTNAM COUNTY, IL

Emergency Action Plan (EAP)

40 C.F.R. § 257.73(a)(3), Ill. Adm. Code 845.520
Coal Combustion Residual (CCR) Impoundment
& Related Facilities

- East Ash Pond (NID # IL50363) (IEPA # W1550100002-05)
- West Ash Pond System (IEPA #W1550100002-01)
- Ash Ponds 2/4 (IEPA #W1550100002-04, #W1550100002-07)

Revision Date: September 23, 2021

Qualified Professional Engineer Certification; Emergency Action Plan for the Hennepin Power Plant East Ash Pond

In accordance with 40 C.F.R. § 257.73(a)(3)(iv) and 35 Ill. Adm. Code 845.520(e), the owner or operator of a CCR unit that is required to prepare a written Emergency Action Plan under 40 C.F.R. § 257.73(a)(3) and 35 Ill. Adm. Code 845.520(a) must obtain a certification from a qualified professional engineer stating that the written Emergency Action Plan meets the requirements of 40 C.F.R. § 257.73(a)(3) and 35 Ill. Adm. Code 845.520.

I, Phil Morris, being a Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief that:

1. the information contained in this Emergency Action Plan was prepared in accordance with the accepted practice of engineering; and
2. this Emergency Action Plan meets the requirements of 40 C.F.R. § 257.73(a)(3) and 35 Ill. Adm. Code 845.520.

Phil Morris

Phil Morris
Senior Director, Corporate Environmental

9/27/21

Date



**HENNEPIN POWER PLANT
EMERGENCY ACTION PLAN
CCR IMPOUNDMENT & RELATED FACILITIES**

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
<u>PART I – EAP NARRATIVE AND EXHIBITS</u>	
1 STATEMENT OF PURPOSE	1
2 COMMUNICATION.....	4
3 EAP ROLES AND RESPONSIBILITIES.....	8
4 EAP RESPONSE	9
5 PREPAREDNESS	14
6 FACILITY/IMPOUNDMENT DESCRIPTION	17
7 BREACH INUNDATION MAPS AND POTENTIAL IMPACTS	19

List of Tables

<u>Table</u>	<u>Page</u>
Table 2-1. EAP Emergency Responders	7
Table 3-1. Summary of EAP Roles	8
Table 4-1. Guidance for Determining the Response Level	9
Table 4-2. Impoundment Trigger Elevations	11
Table 4-3. Step 3: Emergency Actions.....	11
Table 5-1. Emergency Supplies and Equipment	15
Table 5-2. Supplier Addresses.....	16
Table 6-1. Power Plant Impoundment Characteristics	18

List of Figures

<u>Figure</u>	<u>Page</u>
Figure 1-1. Hennepin Power Plant Location Map.....	2
Figure 1-2. Hennepin Power Plant CCR Impoundments & Related Facilities.....	3
Figure 2-1. Summary/Sequence of Tasks 4-Step Incident Response Process.....	4
Figure 2-2. Notification Flowchart.....	5
Figure 2-3. EAP Response Process Decision Tree.....	6
Figure 7-1. East Ash Pond Inundation Map	20

**HENNEPIN POWER PLANT
EMERGENCY ACTION PLAN
CCR IMPOUNDMENT & RELATED FACILITIES**

PART I – EAP NARRATIVE AND EXHIBITS

1 STATEMENT OF PURPOSE

The Hennepin Power Plant (Power Plant) is located near the Village of Hennepin in Putnam County, Illinois. The location is shown in Figure 1-1. The Power Plant is a retired coal-fired electricity producing power plant owned and operated by Dynegy Midwest Generation, LLC (DMG). This Emergency Action Plan (EAP) was prepared in accordance with 40 CFR § 257.73(a)(3) and covers the following Coal Combustion Residual (CCR) surface impoundment located at the site:

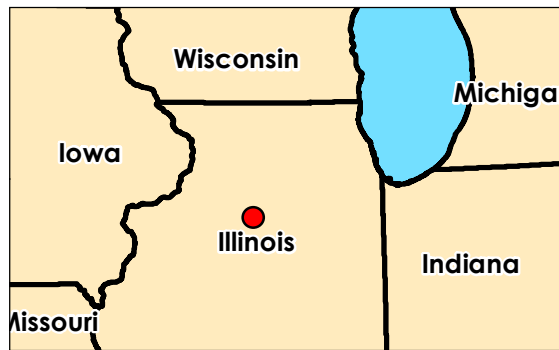
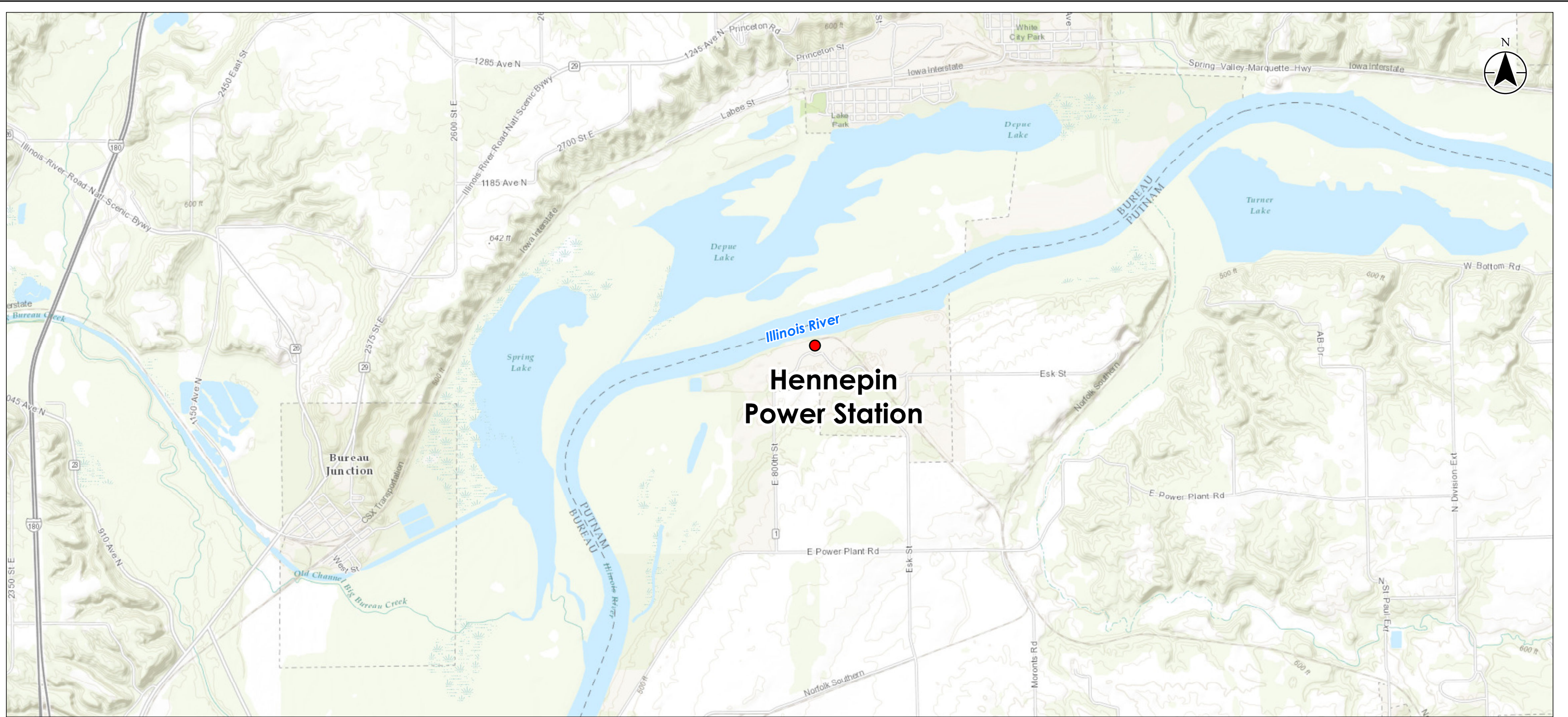
- East Ash Pond (NID # IL50363) (IEPA # W1550100002-05)

The location of the impoundment is shown in Figure 1-2. Section 6 of this EAP includes a description of the impoundment.

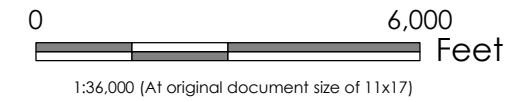
The purpose of this Emergency Action Plan (EAP) is to:

1. Safeguard the lives, as well as to reduce property damage, of citizens living within potential downstream flood inundation areas of the CCR impoundment and related facilities at the Hennepin Power Plant.
2. Define the events or circumstances involving the CCR impoundment and related facilities at the Hennepin Power Plant that represent atypical operating conditions that pose a safety hazard or emergency and how to identify those conditions.
3. Define responsible persons, their responsibilities, and notification procedures in the event of a safety emergency.
4. Provide contact information of emergency responders.
5. Identify emergency actions in the event of a potential or imminent failure of the impoundment.
6. Identify the downstream area that would be affected by failure of the impoundment.
7. Provide for effective facility surveillance, prompt notification to local Emergency Management Agencies, citizen warning and notification responses, and preparation should an emergency occur.

Information provided by DMG was utilized and relied upon in preparation of this report.



- Notes**
1. Coordinate System: NAD 1983 StatePlane Illinois West FIPS 1202 Feet
 2. Aerial Source: 2015 NAIP Imagery
 3. Impoundment Boundaries Provided by Client (Dated 9/9/2015)



Project Location: 175605019
 Latitude: 41.302685
 Longitude: -89.303883
 Putnam County, Illinois
 Prepared by CI on 2017-04-12
 Technical Review by CI on 2017-04-12
 Independent Review by MT on 2017-04-12

Client/Project
 Hennepin Power Station
 Emergency Action Plan

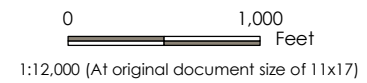
Figure No.
1-1

Title
Location Map



Legend

CCR Surface Impoundment Boundary



Project Location: 175605019
 Latitude: 41.302975 Prepared by CI on 2017-04-12
 Longitude: -89.315035 Technical Review by CI on 2017-04-12
 Putnam County, Illinois Independent Review by MT on 2017-04-12

Client/Project
 Hennepin Power Station
 Emergency Action Plan

Figure No.
1-2
 Title

CCR Impoundment

- Notes**
1. Coordinate System: NAD 1983 StatePlane Illinois West FIPS 1202 Feet
 2. Aerial Source: 2015 NAIP Imagery
 3. Impoundment Boundaries Provided by Client (Dated 9/9/2015)

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2 COMMUNICATION

To facilitate understanding among everyone involved in implementing this EAP, four response levels are used to identify the condition of an impoundment. These are:

Response Levels:

- **Level 0:** Normal conditions and routine operations, including surveillance and initial investigation of unusual conditions and effects of storm events.
- **Level 1:** Potentially hazardous condition exists, requiring investigation and possible corrective action.
- **Level 2:** Potential failure situation is developing; possible mode of failure is being assessed; corrective measures are underway.
- **Level 3:** Failure is occurring or is imminent, public protective actions are required.

The 4-Step Incident Response Process is outlined in Figure 2-1 and described in detail in Appendix D. This should be used in conjunction with the Notification Flowchart (Figure 2-2) and EAP Decision Tree (Figure 2-3). Section 4 provides guidance tables for determining Response Levels and a table providing emergency actions to be taken given various situations. Table 2-1 lists contact information for the emergency responders.

Figure 2-1. Summary/Sequence of Tasks 4-Step Incident Response Process

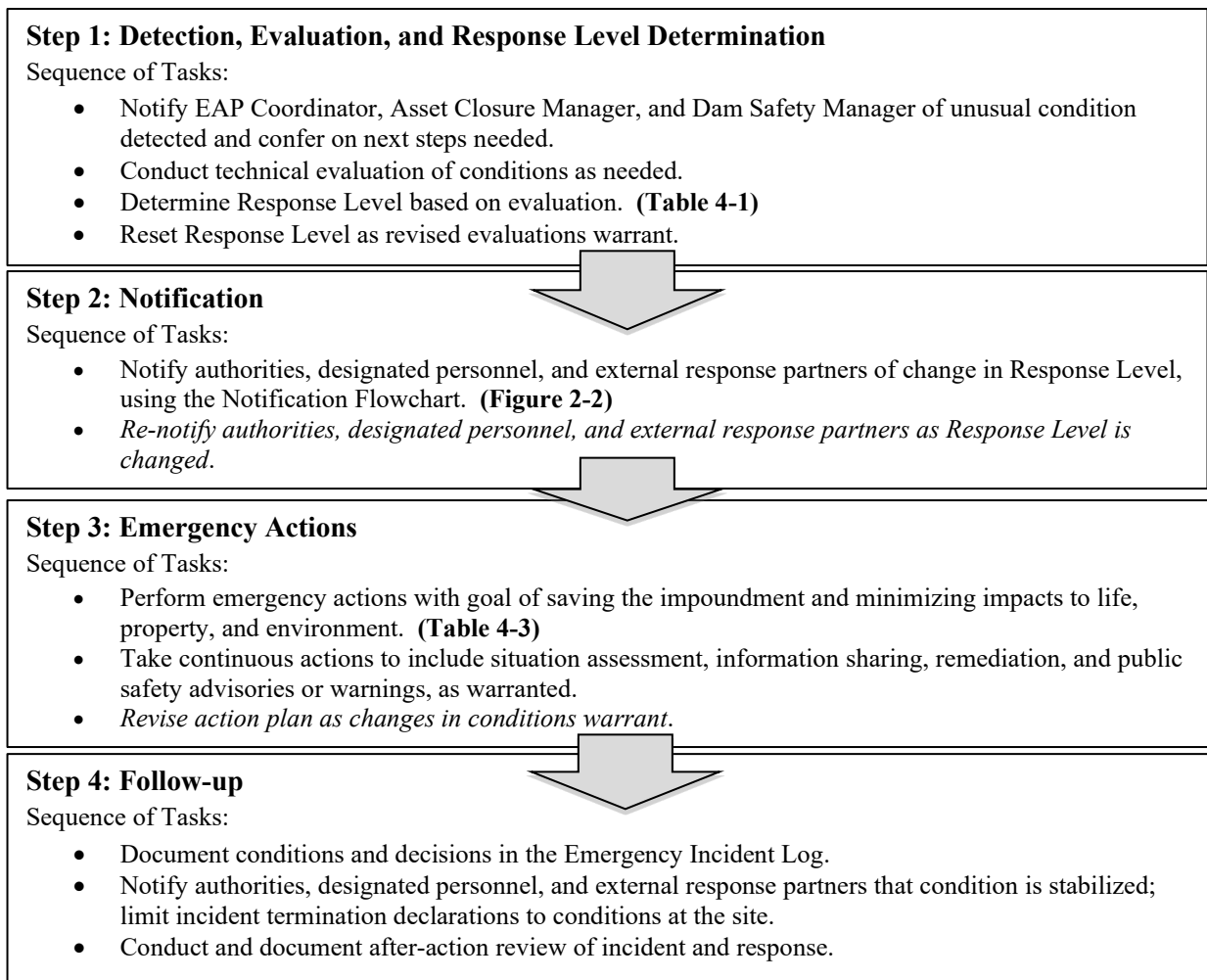
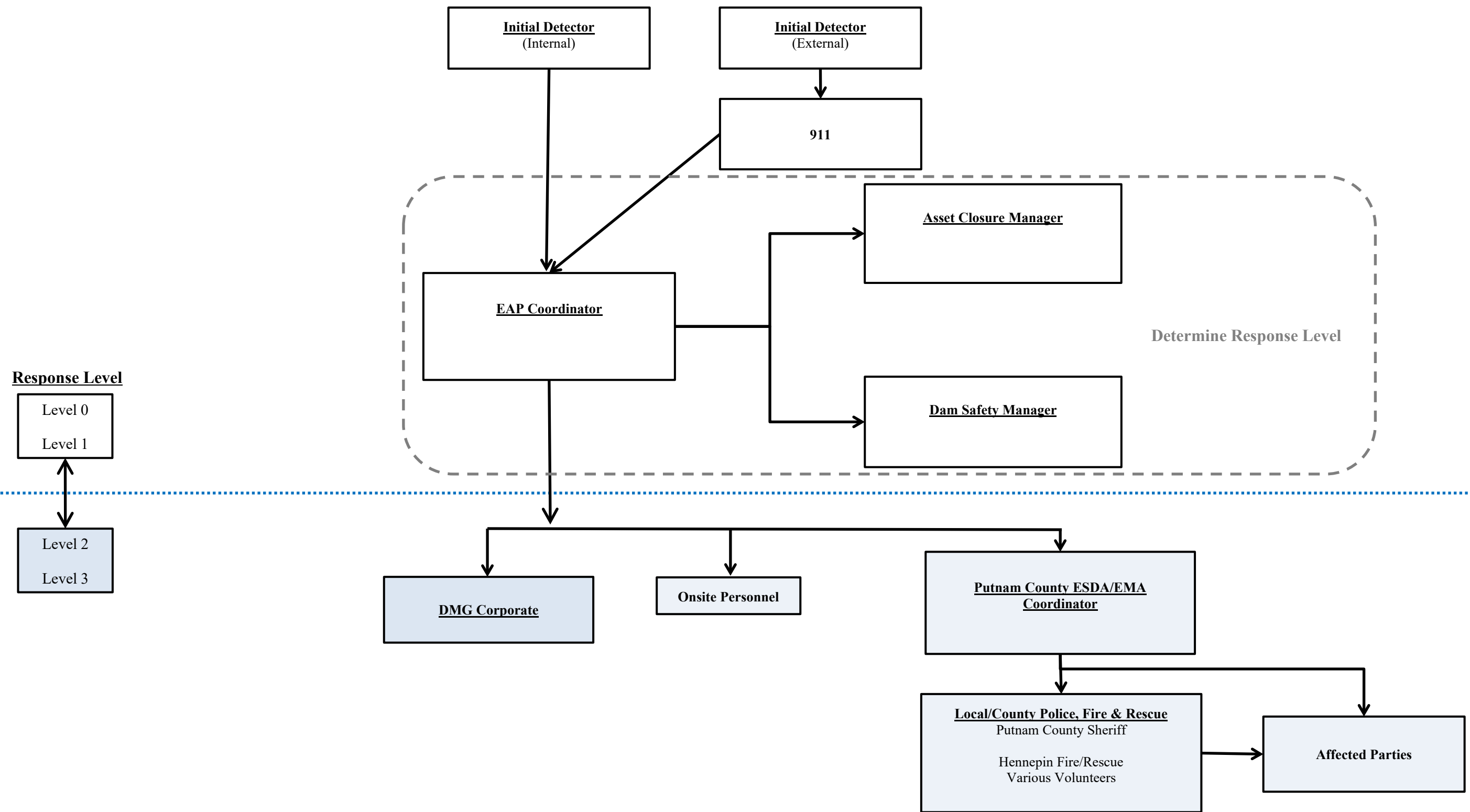


Figure 2-2. Notification Flowchart



Response Level

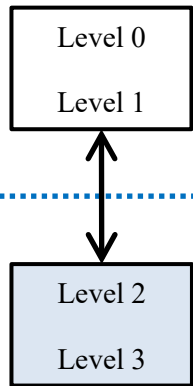


Figure 2-3. EAP Response Process Decision Tree

Note: At any given below, if failure is imminent or actively occurring **CALL 911 IMMEDIATELY** to notify emergency responders and then continue with process afterwards.

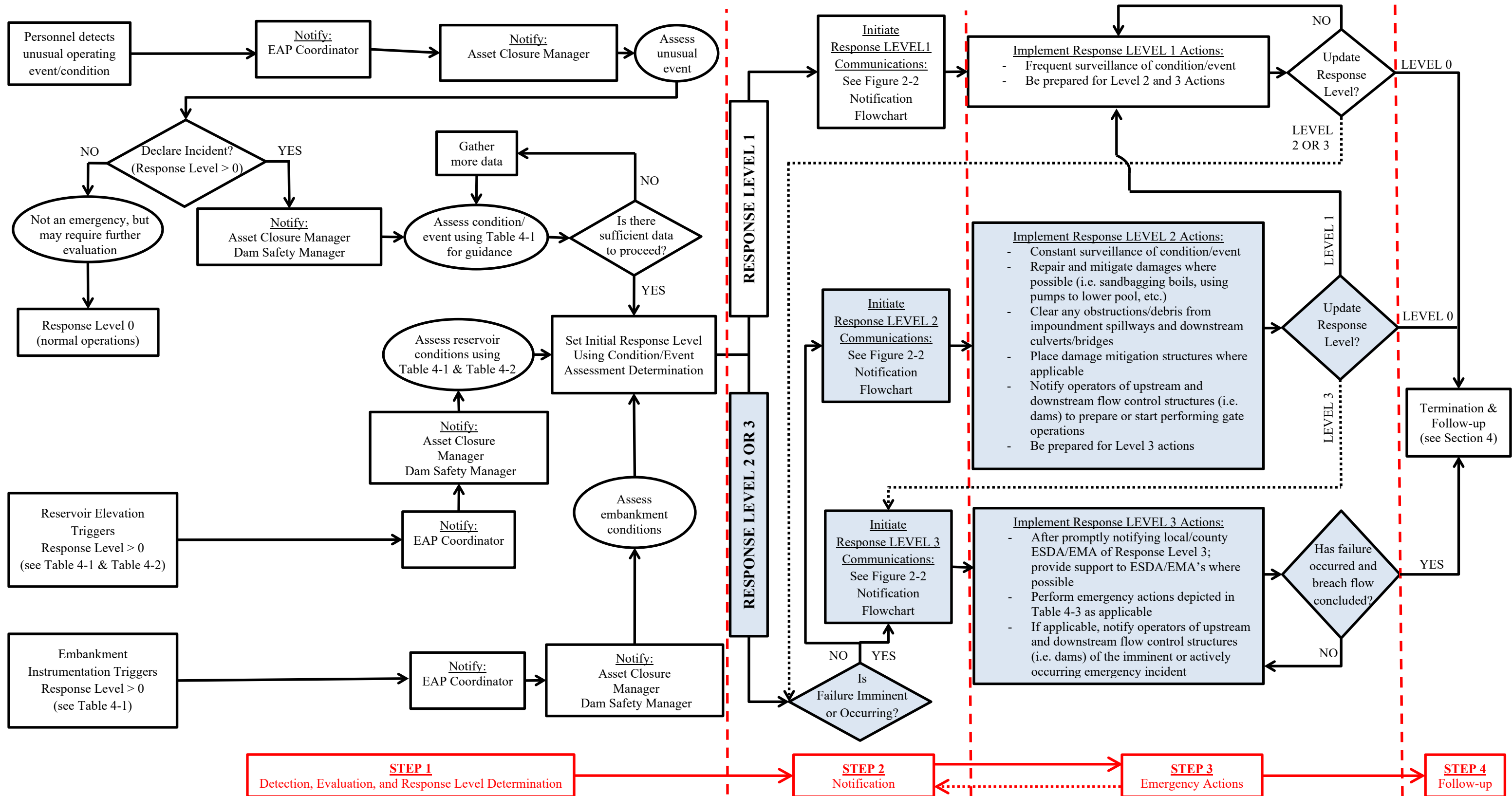


Table 2-1. EAP Emergency Responders

Position / Entity	Contact Information	
Internal Contacts		
Hennepin Power Plant	Contact	
Asset Closure Manager		
EAP Coordinator		
DMG Corporate Operations	Contact	
Dam Safety Manager	(618) 792-8488	
External Contacts		
Local/County ESDA/EMA, Police, & Fire	Phone #	Alternate Phone #
Putnam County 911 Emergency Communication Center	911	(815) 882-2635
Putnam County – ESDA/EMA	(815) 925-3073	(815) 252-2873
Putnam County – Sheriff Dept.	(815) 925-7015	
Village of Hennepin – Fire Dept.	(815) 925-7225	
State Emergency Management Agencies & Organizations	Phone #	Alternate Phone #
Illinois Conservation Police	(815) 587-5136	
Donnelley State Fish and Wildlife Area	(815) 447-2353	

3 EAP ROLES AND RESPONSIBILITIES

Table 3-1 provides a summary of the EAP roles during an emergency event.

Table 3-1. Summary of EAP Roles

Entity	Role Description
DMG Emergency Response Team (ERT)	<p>ERT: DMG personnel responsible for EAP implementation, distribution, updates/maintenance, and training activities. The <u>ERT</u> is comprised of the following roles;</p> <ol style="list-style-type: none"> 1. DMG Corporate: DMG corporate entity, committee, team, or position with relevant responsibility for a given generating power plant. 2. Asset Closure Management: Personnel responsible for day-to-day operation and management of the Power Plant. 3. Dam Safety Manager: Personnel that is most knowledgeable about the design and technical operation of facilities at a given power plant. 4. EAP Coordinator: Personnel responsible for implementing the EAP and associated activities <p style="text-align: center;"><u>Emergency Event – EAP Responsibilities</u></p> <ol style="list-style-type: none"> 1. Respond to emergencies at the Power Plant. 2. Verify and assess emergency conditions. 3. Notify and coordinate as appropriate with participating emergency services disaster agencies or emergency management agencies (ESDA/EMA’s), emergency responders, regulatory agencies, and all other entities involved or affected by this EAP. 4. Take corrective action at the Power Plant. 5. Declare termination of emergencies at the Power Plant.
Putnam County ESDA/EMA	<ol style="list-style-type: none"> 1. Receive Response Level reports from <u>DMG Corporate</u> through <u>EAP Coordinator</u>. 2. Coordinate emergency response activities with local authorities: police, fire and rescue, etc. 3. Coordinate notification of public as necessary through established channels, which may include door-to-door contact. 4. Coordinate notification activities to affected parties within inundation areas. 5. Evaluate risk to areas beyond the inundation areas, communicate needs to the <u>DMG Corporate</u> and/or <u>EAP Coordinator</u>, and coordinate aid as appropriate. 6. Responsible for declaring termination of an emergency condition off-site upon receiving notification of an emergency status termination from the <u>DMG Corporate</u>. 7. If necessary, coordinate with <u>State ESDA/EMA</u>.
Village of Hennepin Police, Fire, and Rescue	<ol style="list-style-type: none"> 1. Receive alert status reports from the <u>ERT</u> or the <u>County ESDA/EMA</u>. 2. If necessary, notify affected parties and general public within inundation areas (see Section 7). 3. Render assistance to Putnam County ESDA/EMA, as necessary. 4. Render assistance to <u>DMG Corporate</u> and <u>Power Plant Management</u>, as necessary.
Putnam County Police, Fire and Rescue, and Emergency Services	<ol style="list-style-type: none"> 1. Receive alert status reports from the <u>ERT</u> or the <u>County ESDA/EMA</u>. 2. If necessary, notify affected parties within the inundation area. 3. Provide mutual aid to other affected areas, if requested and able.

4 EAP RESPONSE

The 4-Step Incident Response Process is shown in Figure 2-1. The Decision Tree shown in Figure 2-3 provides a flowchart for the various elements of the response process. Upon reaching Step 4 of the response process (termination and follow-up), the EAP Coordinator is responsible for notifying the ESDA/EMA's that the condition of the dam/impoundment has been stabilized. Additional details about the EAP response process can be found in Appendix D. The purpose of this section is to provide specific information that can be used during a response. This information is provided in the following tables:

- Table 4-1 provides guidance for determining the response level.
- Table 4-2 provides impoundment pool level trigger elevations.
- Table 4-3 lists emergency actions to be taken depending on the situation.

Table 4-1. Guidance for Determining the Response Level

Event	Situation	Response Level
Spillway flow (See Table 4-2 for relevant elevations)	Primary spillway flow is not causing active erosion.	Level 0
	Impoundment water surface elevation is at or above auxiliary spillway crest elevation (if equipped). No active erosion caused by spillway flow.	Level 1
	Spillway flow actively causing minor erosion that is not threatening the control section or dam/impoundment stability.	Level 2
	Spillway flow that could result in flooding of people downstream if the reservoir level continues to rise.	Level 2
	Abnormal operation of the spillway system due to blockage or damage that could lead to flooding.	Level 2
	Spillway flow actively eroding the soil around the spillway that is threatening the control section (e.g., undermining) or dam/impoundment stability.	Level 3
	Spillway flow that is flooding people downstream.	Level 3
Embankment overtopping (See Table 4-2 for relevant elevations)	Impoundment water surface elevation at or below typical normal pool fluctuation elevation.	Level 0
	Impoundment water surface elevation above typical normal pool fluctuation elevation.	Level 1
	Impoundment water surface elevation above high normal pool fluctuation elevation.	Level 2
	Impoundment water surface elevation at or above embankment crest elevation.	Level 3
Seepage	New seepage areas in or near the dam/impoundment with clear flow.	Level 1
	New seepage areas with cloudy discharge or increasing flow rate.	Level 2
	Heavy seepage with active erosion, muddy flow, and/or sand boils.	Level 3
Sinkholes	Observation of new sinkhole in impoundment area or on embankment.	Level 2
	Rapidly enlarging sinkhole and/or whirlpool in the impoundment.	Level 3
	New cracks in the embankment greater than ¼ inch wide without seepage.	Level 1

Table 4-1. Guidance for Determining the Response Level

Event	Situation	Response Level
Embankment cracking	Any crack in the embankment with seepage.	Level 2
	Enlarging cracks with muddy seepage.	Level 3
Embankment movement	Visual signs of movement/slippage of the embankment slope.	Level 1
	Detectable active movement/slippage of the embankment slope or other related effects (tension cracking, bulges/heaves, etc.) that could threaten the integrity of the embankment.	Level 2
	Sudden or rapidly proceeding slides of the embankment slopes.	Level 3
Embankment Monitoring Equipment (piezometers, inclinometers, surface displacement mounts, etc.)	Instrumentation readings beyond historic normal.	Level 1
	Instrumentation readings indicate the embankment is susceptible to failure.	Level 2
	Instrumentation readings indicate embankment is at threshold of failure or is currently failing.	Level 3
Earthquake or another event	Measurable earthquake felt or reported on or within 100 miles of the impoundment.	Level 1
	Earthquake or other event resulting in visible damage to the impoundment or appurtenances.	Level 2
	Earthquake or other event resulting in uncontrolled release of water or materials from the impoundment.	Level 3
Security threat	Verified bomb threat or other physical threat that, if carried out, could result in damage to the impoundment.	Level 2
	Detonated bomb or other physical damage that has resulted in damage to the impoundment or appurtenances.	Level 3
Sabotage/vandalism	Damage to impoundment or appurtenance with no impact to the functioning of the impoundment.	Level 1
	Modification to the impoundment or appurtenances that could adversely impact the functioning of the impoundment. This would include unauthorized operation of spillway facilities.	Level 2
	Damage to impoundment or appurtenances that has resulted in seepage flow.	Level 2
	Damage to impoundment or appurtenances that has resulted in uncontrolled water release.	Level 3

Table 4-2. Impoundment Trigger Elevations

Impoundment	Embankment Crest Elevation ¹	Auxiliary Spillway Crest Elevation	Normal Pool Fluctuation	
			Typical	High
East Ash Pond	494.0 ft.	Not Applicable	490.4 ft.	492.2

Notes:

¹ 2015 Hennepin Topography, prepared by Weaver Consultants Group, December 2015

Table 4-3. Step 3: Emergency Actions

Condition	Description of Condition	Action to be Taken
High Water Level/ Large Spillway Release	See Table 4-1 and Table 4-2 for elevations and triggering water levels associated with the impoundments and spillways covered by this EAP.	<ol style="list-style-type: none"> 1. Assess cause of increased reservoir stage, especially during fair weather conditions. 2. Determine Response Level. 3. Make proper notifications as outlined in the Figure 2-2 Notification Flowchart. 4. Perform additional tasks as determined through consultation with the ERT. 5. Make notifications if condition worsens such that downstream flooding is imminent. <p>Response Level 0: require enhanced surveillance 3 times per day</p> <p>Response Level 1: contact internal chain of command and external response partners as necessary; inspect impoundment minimum 1 time per hour</p> <p>Response Level 2: contact internal chain of command; notify ESDA/EMA's and notify external response partners. ESDA/EMA's notify affected parties.</p> <p>Response Level 3: contact internal chain of command; notify ESDA/EMA's and notify external response partners. ESDA/EMA's notify affected parties of emergency incident.</p>
Seepage	Localized new seepage or boil(s) observed along downstream face / toe of earthen embankment with muddy discharge and increasing but controllable discharge of water.	<ol style="list-style-type: none"> 1. Measure and record feature dimensions, approximate flow rate, and relative location to existing surface features. Take photos. Document location on a site plan and in inspection notes. 2. Determine Response Level. 3. Make proper notifications as outlined in the Figure 2-2 Notification Flowchart 4. ERT (with Dam Safety Engineer as lead) to determine mitigation actions. The following actions may apply: <ol style="list-style-type: none"> a) Place a ring of sandbags with a weir at the top towards the natural drainage path to monitor flow rate. If boil becomes too large to sandbag, place a blanket filter over the area using non-woven filter fabric and pea gravel. Attempt to contain flow in such a manner (without performing any excavations) that flow rates can be measured. Stockpile gravel and sand fill for later use, if necessary. b) Inspect the embankment and collect piezometer, water level and seepage flow data daily unless otherwise instructed by the Engineer. Record any changes of conditions. Carefully observe embankment for signs of depressions, seepage, sinkholes, cracking or movement. c) Maintain continuous monitoring of feature. Record measured flow rate and any changes of condition, including presence or absence of muddy discharge.

Table 4-3. Step 3: Emergency Actions

Condition	Description of Condition	Action to be Taken
		<ol style="list-style-type: none"> 5. Make notifications as outlined in the lower portion of the Notification Flowchart (Figure 2-2) if condition worsens such that failure is imminent.
Sabotage and Miscellaneous Other Issues	<p>Criminal action with significant damage to embankment or structures where significant repairs are required and the integrity of the facility is compromised—condition appears stable with time.</p>	<ol style="list-style-type: none"> 1. Contact law enforcement authorities and restrict all access (except emergency responders) to impoundment. Restrict traffic on embankment crest to essential emergency operations only. 2. Determine Response Level. 3. Make internal notifications as outlined in the upper portion of the Notification Flowchart (Figure 2-2). 4. In conjunction with the Dam Safety Manager, assess extent of damage and visually inspect entire embankment and ancillary structures for additional less obvious damage. Based on inspection results, confirm if extent of damage to various components of the impoundment warrants a revised Response Level and additional notifications. 5. Perform additional tasks as directed by the ERT. 6. Make notifications if conditions worsen.
Embankment Deformation	<p>Cracks: New longitudinal (along the embankment) or transverse (across the embankment) cracks more than 6 inches deep or more than 3 inches wide or increasing with time. New concave cracks on or near the embankment crest associated with slope movement.</p>	<ol style="list-style-type: none"> 1. Measure and record feature dimensions, approximate flow rate, and relative location to existing surface features. Take photos. Document location on a site plan and in inspection notes. 2. Restrict traffic on embankment crest to essential emergency operations only. 3. Determine Response Level. 4. Make notifications as outlined in the Figure 2-2 Notification Flowchart. 5. ERT (with Dam Safety Manager as lead) to determine mitigation actions. The following actions may apply: <ol style="list-style-type: none"> a) Place buttress fill against base of slope immediately below surface feature. Stockpile additional fill. b) Place sandbags as necessary around crack area to divert any storm water runoff from flowing into crack(s). 6. As directed by the Dam Safety Manager, additional inspection and monitoring of the dam may be required. Items may include inspect the dam on a schedule determined by the engineers; collect piezometer and water level data; and record any changes of condition. Carefully observe dam for signs of depressions, seepage, sinkholes, cracking or movement. 7. Make notifications as outlined in the Figure 2-2 Notification Flowchart if conditions worsen such that failure is imminent.
Embankment Deformation (cont.)	<p>Slides / Erosion: Deep slide / erosion (greater than 2 feet deep) on the embankment that may also extend beyond the embankment toe but does not encroach onto the embankment crest and appears stable with time.</p>	<ol style="list-style-type: none"> 1. Measure and record feature dimensions, approximate flow rate, and relative location to existing surface features. Take photos. Document location on a site plan and in inspection report. 2. Restrict traffic on embankment crest to essential emergency operations only. 3. Determine the Response Level. 4. Make notifications as outlined in the Figure 2-2 Notification Flowchart. 5. ERT (with Dam Safety Manager as lead) to determine mitigation actions. Additional actions may include the following items. <ol style="list-style-type: none"> a) Place sandbags as necessary around slide area to divert any storm water runoff from flowing into slide(s). b) Increase inspections of the dam; collect piezometer and water level data; and record any changes of condition. During inspections, carefully observe dam for signs of depressions, seepage, sinkholes, cracking or movement.

Table 4-3. Step 3: Emergency Actions

Condition	Description of Condition	Action to be Taken
	<p>Sinkholes: Small depression observed on the embankment or within 50 feet of the embankment toe that is less than 5 feet deep and 30 feet wide or which is increasing with time.</p>	<ol style="list-style-type: none"> 6. Make notifications as outlined in the Figure 2-2 Notification Flowchart if conditions worsen such that failure is imminent. <ol style="list-style-type: none"> 1. Slowly open drain gates to lower pool elevation. 2. Measure and record feature dimensions, approximate flow rate, and relative location to existing surface features. Take photos. Document location on a site plan and in inspection notes. 3. Restrict traffic on embankment crest to essential emergency operations only. 4. Determine Response Level. 5. Make notifications as outlined in the Figure 2-2 Notification Flowchart. 6. ERT (with Dam Safety Engineer as lead) to determine mitigation actions. Additional actions may include the following items: <ol style="list-style-type: none"> a) Backfill the depression with relatively clean earth fill (free of organic materials) generally even with surrounding grade and slightly mounded (6 to 12 inches higher) in the center to shed storm water away from the depression. Stockpile additional fill. b) Increase inspections of the dam; collect piezometer and water level data daily unless otherwise instructed by engineer; and record any changes of condition. Carefully observe dam for signs of depressions, seepage, sinkholes, cracking or movement. 7. Make notifications as outlined in the Figure 2-2 Notification Flowchart if conditions worsen such that failure is imminent.
Gate Malfunction or Failure	Sluice gate damaged structurally (sabotage, debris, etc.) with uncontrolled release of water at a constant volume. Condition appears stable.	<ol style="list-style-type: none"> 1. Close any other gates, if open. 2. Determine Response Level. 3. Make notifications as outlined in the Figure 2-2 Notification Flowchart. 4. Obtain instructions from the Engineer to determine if there are other methods to stop or slow down the flow of water. 5. If conditions worsen such that failure is imminent, make notifications as outlined in the lower portion of the Figure 2-2 Notification Flowchart.

5 PREPAREDNESS

The intent of this section is to provide information that will be utilized during a response. Established emergency supplies and locations, suppliers, and equipment are provided in Table 5-1. Suppliers contact information is listed in Table 5-2.

A coordination meeting shall be conducted annually between representatives of DMG Midwest Generation, LLC, and local emergency responders. This meeting may be in the form of a face-to-face meeting, tabletop exercise, or additional training regarding the EAP.

Table 5-1. Emergency Supplies and Equipment

Item	On-site (Yes/No/Occasionally)	Remarks
Flashlights	Yes	Typically, at Hennepin Power Plant maintenance facility, contact shift supervisor location(s).
Generator		
Extension Cords		
Fire extinguishers		
Floodlights		
Backhoe	Yes	Contact shift supervisor for location(s). For rental equipment contact: <ul style="list-style-type: none"> Gensini Excavating, Inc. (815) 925-7050 Central Illinois Equipment Sales, Inc. (815) 687-7022
Dozer	No	Old one may be available on site, contact shift supervisor for location(s). For rental equipment contact: <ul style="list-style-type: none"> Gensini Excavating, Inc. (815) 925-7050 Central Illinois Equipment Sales, Inc. (815) 687-7022
Large Equipment (Rental – including excavating equipment, pumps, lighting)	Occasionally	Portable lighting, backhoe and bobcat available on-site. Contact shift supervisor for availability and location(s). For rental equipment contact: <ul style="list-style-type: none"> Gensini Excavating, Inc. (815) 925-7050 Central Illinois Equipment Sales, Inc. (815) 687-7022
Dump Truck	No	Old one may be available on site, contact shift supervisor for location(s). For rental equipment contact: <ul style="list-style-type: none"> Gensini Excavating, Inc. (815) 925-7050 Illinois Truck & Equipment (815) 941-1900
Pump and Hoses	Yes	3” and 2” trash pumps available. Contact shift supervisor for location(s). For additional pumps/hoses contact: <ul style="list-style-type: none"> United Rentals (815) 223-7962
Sandbags and Sand	Occasionally	Contact shift supervisor for location(s). For additional materials contact: <ul style="list-style-type: none"> Home Depot (815) 224-2968 Menards (815) 224-5621 Tri-Con Material (815) 872-3206
Fill (Stone, aggregate, sand)	Yes	Quarry next door and some fill on-site. Contact shift supervisor for location(s). For additional materials contact: <ul style="list-style-type: none"> Tri-Con Material (815) 872-3206 Western Sand & Gravel Co. (815) 664-2341
Concrete/grout	No	To obtain materials contact: <ul style="list-style-type: none"> Western Sand & Gravel Co. (815) 664-2341
Geotextile Filter Fabric	No	To obtain materials contact: <ul style="list-style-type: none"> Home Depot (815) 224-2968 Menards (815) 224-5621
Plastic Sheeting	No	To obtain materials contact: <ul style="list-style-type: none"> Home Depot (815) 224-2968 Menards (815) 224-5621
Rope	Yes	Contact shift supervisor for location(s).
Personal Flotation Devices	Yes	Contact shift supervisor for location(s).

Table 5-2. Supplier Addresses

Supplier	Distance from Site (miles)	Address
Gensini Excavating, Inc.	7	8100 Deer Drive, Hennepin IL
Grassers True Value	15	404 W Main Street, McNabb, IL
R.P Lumber Company	18	1315 N Main Street, Princeton, IL
Menards	17	5353 Mahoney Drive, Peru, IL
Home Depot	17	4242 Venture Drive, Peru, IL
Tri-Con Material	3	13559 Prairie Industrial Pkwy, Hennepin, IL
Western Sand & Gravel Company	11	400 Old N Road, Spring Valley, IL
Central Illinois Equipment Sales, Inc	5	1254 Old Hwy 26, Hennepin, IL
United Rentals	15	2901 Peoria Street, Peru, IL
Illinois Truck and Equipment	60	320 Briscoe Drive, Morris, IL

6 FACILITY/IMPOUNDMENT DESCRIPTION

The impoundment included in this EAP is described as follows and illustrated in Figure 1-2. Table 6-1 contains additional geometric details for the impoundment.

Hennepin Power Plant is located in Hennepin, Illinois along the east bank of the Illinois River in Putnam County approximately 100 miles southwest of Chicago.

The East Ash Pond is located east of the Hennepin Power Plant. As described in a dam assessment report prepared for the Environmental Protection Agency in 2011, East Ash Pond was originally constructed by reshaping an area that was an existing gravel pit to form the current surface impoundment. The gravel pit at the time of construction was described to be equal to or greater than the maximum elevation proposed for the impoundment. The pond functions as a sedimentation basin for coal combustion wastes, including bottom ash, fly ash, miscellaneous power plant low volume waste, and coal pile runoff streams which are piped from the plant and discharged into the impoundment. Flow through East Ash Pond is discharged into the Leachate Pond to the northeast through an 18-inch diameter reinforced concrete pipe outlet structure.

Table 6-1. Power Plant Impoundment Characteristics

Feature/Parameter	East Ash Pond
Maximum Embankment Height ²	32 ft.
Length of Dam ¹	950 ft.
Crest Width ¹	25 ft.
Crest Elevation ¹	494.0 ft.
Reservoir Area at Top of Dam ¹	9.9 acres
Storage Capacity at Top of Dam ¹	49.7 acre-ft.
Primary Spillway Type ²	18 in. dia. RCP
Primary Spillway Crest Elevation ¹	489.9 ft.
Storage Capacity at Primary Spillway Elevation ¹	23.4 acre-ft.
Reservoir Area at Normal Water Surface Elevation ¹	3.9 acres
Auxiliary Spillway Type	N/A
Auxiliary Spillway Crest Elevation	N/A

Notes:

- 1 2015 Hennepin Topography, prepared by Weaver Consultants Group, December 2015
- 2 USEPA Round 10 Dam Assessment Report, Hennepin Power Station, December 2012

7 BREACH INUNDATION MAP AND POTENTIAL IMPACTS

An inundation map for East Ash Pond potential breach scenarios is provided in this section. It is the Putnam County ESDA/EMA's responsibility to keep a current list of affected parties/properties to contact in the case of emergencies that result in Response Level 2 or 3. This list should encompass all properties within and adjacent to the probable inundation extents shown in the provided maps.

The methodology used to identify probable inundation extents for potential breach scenarios varied as a function of the impoundment size, location, surrounding topography, and surrounding structures/facilities/waterbodies.

The inundation extents for East Ash Pond were determined by visual inspection using available topography and the failure description outlined in the Illinois DNR Dam Safety Emergency Response Procedure report, dated November 2005. This methodology was chosen as failure of the East Ash Pond would only result in water transfer to a secondary cell to the east, as all other sides are landlocked and essentially constructed at grade. If failure of this secondary cell also occurred, water would flow into the Illinois River. Although no structures would be impacted by such a failure, significant environmental impacts to the River and areas outside of utility owned property could occur.

The approximate inundation area is illustrated in Figure 7-1.

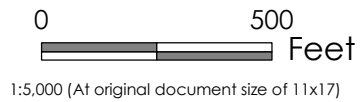


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Legend

- Expected Breach Inundation Area
- CCR Surface Impoundment Boundary



Project Location 175605019
 Latitude: 41.302685 Prepared by CI on 2017-04-03
 Longitude: -89.303883 Technical Review by CI on 2017-04-03
 Putnam County, Illinois Independent Review by MT on 2017-04-03

Client/Project
 Hennepin Power Station
 Emergency Action Plan

Figure No.
7-1

Title
**Inundation Map
 East Ash Pond**

- Notes**
1. Coordinate System: NAD 1983 StatePlane Illinois West FIPS 1202 Feet
 2. Aerial Source: 2015 NAIP Imagery
 3. Impoundment Boundaries Provided by Client (Dated 9/9/2015)

Disclaimer: Stantec assumes no responsibility for data supplied in electronic format. The recipient accepts full responsibility for verifying the accuracy and completeness of the data. The recipient releases Stantec, its officers, employees, consultants and agents, from any and all claims arising in any way from the content or provision of the data.

ATTACHMENT G

CCR Fugitive Dust Control Plan

for

Hennepin Power Plant

Prepared for:

Dynegy Midwest Generation, LLC

**Hennepin Power Plant
13498 East 800th Street
Hennepin, IL 61327**

Prepared by:

**Burns & McDonnell
Kansas City, Missouri**

Amendment 1
October 2021

Table of Contents

1 Introduction 1-1

1.1 Facility Information 1-1

1.2 Certification 1-1

2 CCR Fugitive Dust Control Measures and Appropriateness..... 2-1

2.1 Management of CCR in the CCR Units 2-1

2.2 Handling of CCR..... 2-2

 2.2.1 Conditioning of CCR Prior to Emplacement in CCR Landfill..... 2-3

2.3 Transportation of CCR..... 2-4

3 Procedures for Periodic Assessment of the Plan 3-1

4 Recordkeeping, Notification, Internet Site 4-1

5 Procedures to Log Citizen Complaints 5-1

6 Amendments 6-1

List of Tables

Table 2-1. Control Measures for CCR Management in CCR Units..... 2-1

Table 2-2. Control Measures for Handling CCR 2-2

Table 2-3. Control Measures for Transportation of CCR 2-4

Table 6-1. CCR Fugitive Dust Control Plan Amendments 6-1

1 Introduction

This Coal Combustion Residuals (CCR) fugitive dust control plan has been prepared for the Hennepin Power Plant, located in Putnam County, Illinois. This plan addresses the air criteria in 40 C.F.R. § 257.80 of the United States Environmental Protection Agency's CCR rule, which requires the owner or operator of a CCR unit to "adopt measures that will effectively minimize CCR from becoming airborne at the facility" and to "prepare and operate in accordance with a CCR fugitive dust control plan." The plan also addresses the air criteria in 35 I.A.C. 845.500 of the Illinois Environmental Protection Agency's CCR rule, which contains similar requirements to the federal CCR rule.

1.1 Facility Information

- Facility Name: Hennepin Power Plant
- Facility Address: 13498 East 800th Street, Hennepin, IL 61327
- Owner/Operator: Dynegy Midwest Generation, LLC (DMG)

1.2 Certification

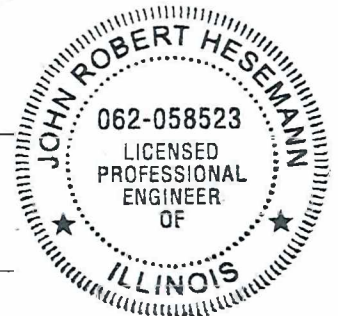
The owner or operator must obtain a certification from a qualified professional engineer that the initial CCR fugitive dust control plan, or any subsequent amendment of it, meets the requirements of 40 C.F.R. § 257.80 and 35 I.A.C. 845.500. See 40 C.F.R. § 257.80(b)(7); 35 I.A.C. 845.500(b)(7).

I certify under penalty of law that, to the best of my knowledge, this plan meets the requirements of 40 C.F.R. § 257.80 and 35 I.A.C. 845.500. This certification is based on my review of the document and conditions at the site and on my inquiry of the person or persons who managed the preparation of this document.

John R. Hesemann
Printed Name of Qualified Professional Engineer

John R. Hesemann 9/09/2021
Signature of Qualified Professional Engineer and Date

062.058523 – Illinois – Expires 11/30/2021
Registration Number and State



2 CCR Fugitive Dust Control Measures and Appropriateness

CCR fugitive dust has the potential to become airborne at the facility during periods of CCR management in the CCR units, CCR handling and CCR transport. Areas at the facility that have the potential for airborne CCR fugitive dust are CCR surface impoundments, an existing CCR landfill, CCR handling equipment and CCR transport in trucks. This section identifies and describes the control measures selected and adopted by the facility to minimize CCR from becoming airborne at the facility and explains how the selected measures are applicable and appropriate for site conditions. The control measures may be adjusted or modified based on observed effectiveness of minimizing CCR from becoming airborne and weather conditions.

2.1 Management of CCR in the CCR Units

The facility currently manages CCR in surface impoundments but will also manage CCR at the facility landfill once it begins receiving CCR. Table 2-1 below identifies CCR fugitive dust control measures that have been selected for use by the facility during CCR management in the CCR units, including placement of CCR into the CCR units, and explains how the selected measures are applicable and appropriate for site conditions. The facility will use the identified measures during CCR management in the CCR units to minimize CCR from becoming airborne at the facility.

CCR Activity	CCR Fugitive Dust Control Measure	Applicability and Appropriateness of Control Measure
Management of CCR in the facility's CCR units	Condition CCR to be emplaced in the landfill before loading into vehicles for transport to the landfill.	Conditioning CCR to be placed in the landfill allows CCR to bind together and thus minimizes the potential for CCR fugitive dust generation when CCR is managed in the landfill. The added moisture content will prevent wind dispersal of the CCR but will not result in free liquids. Use of conditioned CCR also achieves at least equivalent performance to conventional daily cover in terms of preventing wind entrainment.
	Water dry CCR material generated from periodic cleanout/maintenance of CCR handling or CCR dust control systems as it is added into the CCR surface impoundments, as necessary.	Wetting CCR reduces the potential for CCR fugitive dust generation during addition to surface impoundments.
	Wet management of CCR bottom ash in CCR surface impoundments.	Wet management of CCR minimizes the potential for CCR fugitive dust generation.
	Water areas of exposed CCR in CCR units, as necessary.	Water will be applied to areas of exposed CCR to maintain moisture content to minimize the potential for CCR fugitive dust generation in excessively dry or windy conditions. Wetting activities will not generate "free liquids" within the landfill.
	Naturally occurring grass vegetation in areas of exposed CCR in CCR surface impoundments.	Vegetation provides a wind screen and/or cover to reduce wind entrainment of CCR.
	Apply chemical dust suppressant on areas of exposed CCR in CCR units, as necessary.	Mixing an appropriate chemical dust suppressant with water and applying to areas of exposed CCR will minimize the potential for CCR fugitive dust generation in excessively dry or windy conditions.
	Reduce or halt operations during high wind events, as necessary.	Reducing or halting operations during high wind events minimizes the potential for CCR fugitive dust generation.

Table 2-1. Control Measures for CCR Management in CCR Units

2.2 Handling of CCR

CCR is regularly removed from the boiler system and conveyed to the CCR handling system, which includes silos and truck loading areas. CCR fly ash and flue gas desulfurization (FGD) ash is pneumatically conveyed in an enclosed system from the boiler system to storage silos. A pug mill can be used to condition FGD ash as it is loaded into trucks for transport to the surface impoundment. CCR bottom ash is wet sluiced into CCR surface impoundments. At times, CCR fly ash is also wet sluiced into CCR surface impoundments. CCR fly ash can be loaded into trucks for transport to either onsite surface impoundments or offsite. When unloading the CCR fly ash silos for transport to and emplacement in the CCR landfill, a pug mill will be used to condition the CCR fly ash as it is loaded into trucks. Table 2-2 below identifies CCR fugitive dust control measures that have been selected for use by the facility during handling of CCR and explains how the selected measures are applicable and appropriate for site conditions. The facility will use the identified measures when handling CCR to minimize CCR from becoming airborne at the facility.

CCR Activity	CCR Fugitive Dust Control Measure	Applicability and Appropriateness of Control Measure
Handling of CCR at the facility	Wet sluice CCR fly ash and CCR bottom ash to CCR surface impoundments.	Wet sluicing CCR minimizes the potential for CCR fugitive dust generation.
	Pneumatically convey dry CCR fly ash and FGD ash to storage silos in an enclosed system.	Conveying CCR fly ash in an enclosed system minimizes the potential for CCR fugitive dust generation.
	Condition CCR to be emplaced in the landfill before loading into trucks for transport to the landfill, as needed.	Conditioning allows CCR to bind together and thus minimizes the potential for CCR fugitive dust generation while loading CCR into trucks (and during transport and emplacement in the landfill).
	Load CCR transport trucks from the CCR fly ash silos in a partially enclosed area.	Partial enclosure of the CCR transport truck loading area reduces the potential for wind to cause CCR fugitive dust to become airborne.
	Load CCR transport trucks from the CCR fly ash silos using vented spouts.	Use of engineered equipment, such as a vented spout, minimizes the potential for CCR fugitive dust to become airborne.
	Load FGD ash transport trucks from the FGD ash silo using a pug mill or vented spouts, as necessary.	The pug mill on the wet FGD loadout wets the FGD. Wetting allows CCR to bind together and thus minimizes the potential for CCR fugitive dust generation. Wetting will not result in the generation of free liquids. Use of engineered equipment, such as a vented spout, minimizes the potential for CCR fugitive dust to become airborne.
	Perform housekeeping, as necessary, in the fly ash loading area.	Good housekeeping measures, such as sweeping or wetting the loading area, minimize the potential for CCR fugitive dust generation during handling activities.
	Operate fly ash handling system in accordance with good operating practices.	Operation in accordance with good operating practices minimizes the potential for CCR fugitive dust generation.
	Maintain and repair as necessary dust controls on the fly ash handling and truck load-out systems.	Perform maintenance and repairs as needed to maintain dust controls in good operating condition minimizes the potential for CCR fugitive dust generation.
	Reduce or halt operations during high wind events, as necessary.	Reducing or halting operations during high wind events minimizes the potential for CCR fugitive dust generation.

Table 2-2. Control Measures for Handling CCR

2.2.1 Conditioning of CCR Prior to Emplacement in CCR Landfill

Conditioned CCR is CCR that has been wetted with water or an appropriate chemical dust suppressant. Water or a chemical dust suppressant is added to raise the moisture content of the CCR to prevent wind dispersal but will not result in free liquids. Conditioning allows for the CCR to bind together, which minimizes the potential for CCR fugitive dust.

All CCR generated on site that is placed into the facility's landfill will be conditioned in a pug mill or otherwise conditioned prior to emplacement. Therefore, all CCR that is added to the facility's landfill will be emplaced in the landfill as conditioned CCR.

2.3 Transportation of CCR

CCR is transported via truck at the facility using unpaved facility roads. Table 2-3 below identifies CCR fugitive dust control measures that have been selected for use by the facility during transport of CCR. The facility will use the identified measures when transporting CCR to minimize CCR from becoming airborne at the facility.

CCR Activity	CCR Fugitive Dust Control Measure	Applicability and Appropriateness of Control Measure
Transportation of CCR at the facility	Condition CCR to be emplaced in the landfill before it is loaded into vehicles for transport to the landfill.	Conditioning CCR increases moisture content of the CCR and minimizes the potential for CCR fugitive dust generation.
	Cover or enclose trucks used to transport CCR, as necessary.	Covering or enclosing trucks transporting CCR minimizes the potential for CCR fugitive dust generation from the CCR transport trucks.
	Condition CCR materials to be transported offsite before they are loaded into trucks, as necessary.	Conditioning CCR increases moisture content of the CCR and minimizes the potential for CCR fugitive dust generation during CCR transport.
	Limit the speed of vehicles to no more than 15 mph on facility roads.	Limiting the speed of vehicles traveling on facility roads minimizes the potential for CCR fugitive dust generation from the CCR transport trucks.
	Condition CCR haul roads with water or dust suppressant, as necessary.	Watering CCR haul roads will minimize the potential for CCR fugitive dust generation in excessively dry or windy conditions.
	Sweep or rinse CCR off of the outside of the trucks transporting CCR, as necessary.	Removing CCR present on the outside of the truck minimizes the potential for movement of the truck or wind to cause CCR fugitive dust to become airborne.
	Remove CCR, as necessary, deposited on facility road surfaces during transport.	Removing CCR deposited on facility road surfaces as a result of transport minimizes the potential for CCR fugitive dust generation from vehicle traffic.
	Reduce or halt operations during high wind events, as necessary.	Reducing or halting operations during high wind events minimizes the potential for CCR fugitive dust generation.

Table 2-3. Control Measures for Transportation of CCR

3 Procedures for Periodic Assessment of Effectiveness of the Plan

The facility conducts inspections associated with CCR fugitive dust control. The facility also uses the procedures identified in Section 5 of this plan to log every citizen complaint involving CCR fugitive dust events at the facility. These inspections and the investigations of citizen complaints will be used to periodically assess the effectiveness of the CCR fugitive dust control plan per 40 C.F.R. § 257.80(b)(4) and 35 I.A.C. 845.500(b)(3).

The facility routinely performs inspections to verify the effectiveness of the CCR fugitive dust control measures used at the facility. Inspections are conducted during daylight working hours and include observing for the presence of CCR fugitive dust emissions from vehicles transporting CCR on facility roads, CCR handling and CCR management activities, including CCR placement in CCR units. Inspection records include the name of the person conducting the inspection, the date and time of the inspection, the results of the inspection, and any corrective action taken.

When a CCR fugitive dust event is observed or a citizen complaint involving a CCR fugitive dust event at the facility is received, current CCR management practices will be reviewed to see that the selected control measures are being properly implemented. If the control measures are not being properly implemented, relevant operating personnel will be notified and, as warranted, re-trained in the proper implementation of CCR fugitive dust control measures. If appropriate, use of revised and/or additional control measures will be evaluated. As warranted, revised and/or additional control measures found to be applicable and appropriate to control CCR fugitive dust emissions will be incorporated into an amended CCR fugitive dust control plan.

The plan also will be reassessed in the event of material changes in site conditions potentially resulting in CCR fugitive dust becoming airborne at the facility.

4 Recordkeeping, Notification, Internet Site

The written CCR fugitive dust control plan, any amendment of the written plan, and the annual CCR fugitive dust control report required by 40 C.F.R. § 257.80(c) and 35 I.A.C. 845.500(c) will be placed in the facility's written operating record and posted to the company's CCR website in accordance with 40 C.F.R. § 257.105(g), § 257.107(g), and 845.800(d)(7), (14) and 845.810(e). Notification of the availability of the CCR fugitive dust control plan, any amendment of the plan, and the annual CCR fugitive dust control report will be provided to IEPA in accordance with 40 C.F.R. § 257.106(g). Any amendment of the fugitive dust control plan will be submitted to IEPA in accordance with 845.500(b)(5).

Additionally, pursuant to 845.500(b)(6), this fugitive dust control plan is being placed in facility's operating record and posted to the company's CCR website prior to the submission of any permits for the Hennepin Power Plant.

5 Procedures to Log Citizen Complaints

In the event the owner or operator of the facility receives a citizen complaint involving a CCR fugitive dust event at the facility, relevant information about the complaint will be logged. Information that will be recorded includes, as applicable:

- Date/Time the complaint is received
- Date/Time and duration of the CCR fugitive dust event
- Description of the nature of the CCR fugitive dust event
- Name of the citizen entering the complaint
- Address & phone number of citizen entering the complaint
- Name of the personnel who took the complaint
- All actions taken to assess and resolve the complaint

All citizen complaints involving CCR fugitive dust events at the facility will be investigated promptly. As deemed appropriate or necessary, corrective measures will be taken and a follow-up response will be provided to the complainant.

Pursuant to 35 I.A.C. 845.500(b)(2), quarterly reports will be submitted to IEPA no later than 14 days from the end of the quarter for all complaints received in that quarter. At a minimum, the quarterly report will include the date of the complaint, the date of the incident, the name and contact information of the complainant (if given), and all actions taken to assess and resolve the complaints.

6 Amendments

The written CCR fugitive dust control plan may be amended at any time provided the revised plan is placed in the facility’s operating record as required by 40 C.F.R. § 257.105(g)(1) and 845.500(b)(6). Any amendment of the fugitive dust control plan will be submitted to IEPA in accordance with 845.500(b)(5). The written CCR fugitive dust control plan must be amended whenever there is a change in conditions that would substantially affect the written plan in effect.

Amendment Number and Date	Pages or Section	Description of Amendment	Professional Engineer Certifying Plan
Version 0 October 2015	--	Initial Plan	Wendy M. Pennington
Amendment 1 October, 2021	Various	Administrative changes and adjustments to site condition controls as appropriate	John R. Hesemann

Table 6-1. CCR Fugitive Dust Control Plan Amendments

ATTACHMENT H

Intended for
Dynegy Midwest Generation, LLC

Date
October 25, 2021

Project No.
1940100806-005

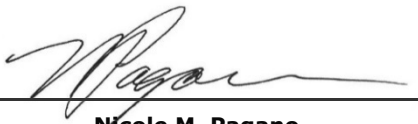
**HYDROGEOLOGIC SITE
CHARACTERIZATION REPORT
EAST ASH POND
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS**

HYDROGEOLOGIC SITE CHARACTERIZATION REPORT HENNEPIN POWER PLANT EAST ASH POND

Project Name **Hennepin Power Plant East Ash Pond**
Project No. **1940100806-005**
Recipient **Dynegy Midwest Generation, LLC**
Document Type **Hydrogeologic Site Characterization Report**
Revision **FINAL**
Date **October 25, 2021**

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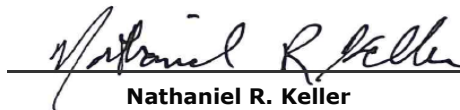
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CONTENTS

Executive Summary	6
1. Introduction	11
1.1 Overview	11
1.2 Part 845 Description	11
1.3 Previous Investigations and Reports	11
1.4 Site Location and Background	13
1.5 Site History and Unit Description	14
2. Regional and Site Geology	16
2.1 Topography	16
2.2 Regional Geomorphology	16
2.3 Soils	17
2.4 Regional Geology	17
2.4.1 Regional Unlithified Geology	17
2.4.2 Regional Bedrock Geology	18
2.4.3 Structure	18
2.4.4 Seismic Setting	19
2.4.5 Mining Activities	20
2.4.6 Industrial Activities	20
2.5 Site Geology	20
2.5.1 Site Specific Unlithified Geology	20
2.5.1.1 Fill and CCRs	21
2.5.1.2 Cahokia Alluvium	21
2.5.1.3 Henry Formation	22
2.5.2 Site Specific Bedrock Geology	23
3. Regional and Local Hydrogeology	24
3.1 Regional Hydrogeology	24
3.1.1 Unlithified Deposits Hydrogeology	24
3.1.2 Bedrock Hydrogeology	24
3.2 Site Hydrogeology	25
3.2.1 Hydrostratigraphic Units	25
3.2.2 Uppermost Aquifer	25
3.2.3 Bedrock Confining Unit	26
3.2.4 Potential Migration Pathways	26
3.2.5 Water Table Elevation and Groundwater Flow Direction	26
3.2.5.1 Vertical Hydraulic Gradients	26
3.2.5.2 Impact of Existing Ponds and Ash Saturation	27
3.2.5.3 Impact of River Stage on Groundwater Flow	27
3.2.6 Hydraulic Conductivity	28
3.2.6.1 Field Hydraulic Conductivity	28
3.2.6.2 Laboratory Hydraulic Conductivity	29
3.2.7 Horizontal Hydraulic Gradients and Groundwater Flow Velocities	29
3.2.8 Groundwater Classification	30
3.3 Surface Water Hydrology	30
3.3.1 Climate	30
3.3.2 Surface Waters	31

4.	Groundwater Quality	33
4.1	Summary of Groundwater Monitoring Activities	33
4.1.1	40 C.F.R. § 257 Program Monitoring and Well Network	33
4.1.2	Part 845 Well Installation and Groundwater Monitoring	34
4.2	Groundwater Monitoring Results and Analysis	35
4.2.1	Boron	35
4.2.2	Chloride	36
4.2.3	Sulfate	36
4.2.4	Total Dissolved Solids	36
4.2.5	pH	36
4.2.6	Cobalt	36
4.2.7	Lithium	37
4.2.8	Thallium	37
5.	Evaluation of Potential Receptors	38
5.1	Water Well Survey	38
5.2	Surface Water	38
5.3	Nature Preserves, Historic Sites, Endangered/Threatened Species	39
6.	Conclusions	40
7.	References	42

TABLES (IN TEXT)

Table A	History of Construction
Table B	Average Monthly Temperature Extremes and Precipitation for Hennepin Water Treatment Plant, Hennepin, Illinois (1981-2010)
Table C	40 C.F.R. § 257 Groundwater Monitoring Program Parameters
Table D	Part 845 Groundwater Monitoring Program Parameters

TABLES (ATTACHED)

Table ES-1	Part 845 Requirements Checklist
Table 2-1	Geotechnical Results
Table 2-2	Ash Analytical Results
Table 2-3	Porewater Analytical Results
Table 2-4	Soil Analytical Results
Table 3-1	Monitoring Well Locations and Construction Details
Table 3-2	Vertical Hydraulic Gradients
Table 3-3	Field Hydraulic Conductivities
Table 3-4	Horizontal Hydraulic Gradients and Groundwater Flow Velocities
Table 4-1	Groundwater Analytical Results
Table 4-2	Groundwater Field Parameters

FIGURES (IN TEXT)

Figure A	Hydrograph Comparison for Well 14 and the Illinois River (STMI, 1996).
Figure B	Daily Gage Height (feet) January 1, 2016 to August 31, 2021 for USGS Gaging Station 05558300 at the Illinois River near Henry, Illinois

FIGURES (ATTACHED)

Figure 1-1	Site Location Map
Figure 1-2	Site Map
Figure 2-1	Site Topographic Map
Figure 2-2	Soil Survey Map
Figure 2-3	Surficial Geologic Deposits
Figure 2-4	Generalized Stratigraphic Column for the Hennepin Area
Figure 2-5	Major Structural Features of Illinois
Figure 2-6	Field Investigation Location Map
Figure 2-7	Bottom of Ash
Figure 2-8	Geologic Cross Sections A-A' and B-B'
Figure 3-1	Monitoring Well Location Map
Figure 3-2	Top of Uppermost Aquifer
Figure 3-3	Uppermost Aquifer Groundwater Elevation Contours, February 24-26, 2021
Figure 3-4	Uppermost Aquifer Groundwater Elevation Contours, March 17-19 and 22, 2021
Figure 3-5	Uppermost Aquifer Groundwater Elevation Contours, April 7, 2021

APPENDICES

Appendix A	Boring Logs and Well Construction Logs
Appendix B	Geotechnical Laboratory Reports
Appendix C	Groundwater Elevations (2015-2021) and Contour Maps (2015-2020)
Appendix D	Hydraulic Conductivity Test Data
Appendix E	Information Pertinent to 35 I.A.C. § 845.220(a)(3)
Appendix F	FEMA Flood Hazard Map

ACRONYMS AND ABBREVIATIONS

°F	degree Fahrenheit
§	Section
35 I.A.C.	Title 35 of the Illinois Administrative Code
40 C.F.R.	Title 40 of the Code of Federal Regulations
AP2	Ash Pond No. 2
AP4	Ash Pond No. 4
bgs	below ground surface
CCR	coal combustion residuals
CCW	coal combustion waste
CCWL	Coal Combustion Waste Landfill
CEC	Civil & Environmental Consultants, Inc.
cm/s	centimeters per second
CSM	conceptual site model
DMG	Dynegy Midwest Generation, LLC
DWW	Illinois Drinking Water Watch
EAP	East Ash Pond
EAPS	East Ash Pond System, includes CCWL, EAP, AP2, and AP4
FEMA	Federal Emergency Management Agency
ft/day	feet/day
ft/ft	feet per foot
g	horizontal acceleration
GMP	Groundwater Monitoring Plan
gpm	gallons per minute
GWPS	groundwater protection standard
GZA	GZA GeoEnvironmental, Inc.
Haley & Aldrich	Haley & Aldrich, Inc.
HCR	Hydrogeologic Site Characterization Report
HMP	Hydrogeologic Monitoring Plan
HPP	Hennepin Power Plant
HUC	Hydrologic Unit Code
ID	identification
IDNR	Illinois Department of Natural Resources
IEPA	Illinois Environmental Protection Agency
IFR	Initial Facility Report
ILWATER	Illinois Water and Related Wells
ISGS	Illinois State Geological Survey
ISWS	Illinois State Water Survey
Kelron	Kelron Environmental
Mathes	John Mathes & Associates
mg/L	milligrams per liter
MSL	above mean sea level
MW	megawatts

NAVD88	North American Vertical Datum of 1988
NGWMN	National Groundwater Monitoring Network
NGVD29	National Geodetic Vertical Datum of 1929
NID	National Inventory of Dams
No.	number
NPDES	National Pollutant Discharge Elimination System
NRT	Natural Resource Technology, Inc.
NRT/OBG	Natural Resource Technology, an OBG Company
OWAP	Old West Ash Pond
OWPP	Old West Polishing Pond
Part 845	Residuals in Surface Impoundments: Title 35 of the Illinois Administrative Code § 845
pcf	pounds per cubic foot
PWS	public water system
Ramboll	Ramboll Americas Engineering Solutions, Inc.
SCS	Soil Conservation Service
SDWIS	Safe Drinking Water Information System
SI	surface impoundment
Site	East Ash Pond
STMI	Science & Technology Management, Inc.
SU	standard units
TDS	total dissolved solids
USCS	Unified Soil Classification System
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Services
USGS	United States Geological Survey

EXECUTIVE SUMMARY

This Hydrogeologic Site Characterization Report (HCR) for the East Ash Pond (EAP) expands upon the hydrogeology, groundwater quality data, and conceptual site model (CSM) presented in previous hydrogeologic investigation reports prepared for the EAP and also the East Ash Pond System (EAPS) which were most recently submitted and approved by the Illinois Environmental Protection Agency (IEPA) as part of the February 2018 *Closure and Post-Closure Care Plan for the Hennepin East Ash Pond No. 2 (Closure Plan)* (Civil & Environmental Consultants, Inc. [CEC], 2018). This report has been assembled to satisfy the information and analysis requirements of Title 35 of the Illinois Administrative Code (35 I.A.C.) Section (§) 845.620 as summarized in **Table ES-1**. The CSM includes hydrogeologic and groundwater quality data specific to the EAP, which has been collected from 1983 to 2021.

The Hennepin Power Plant (HPP) property is bordered on the north by the Illinois River, on the south and east by industrial property, and on the west by agricultural land (**Figure 1-1**). The EAP (Vistra identification [ID] number [No.] 803, IEPA ID No. W1550100002-05, and National Inventory of Dams [NID] No. IL50363), is a lined unit constructed in 1995 and 1996 to replace the Ash Pond No. 2 (AP2) which was removed from service. Four coal combustion residuals (CCR) surface impoundments (SIs) are present on the HPP property and two of them are adjacent to the EAP, including: AP2 (Vistra ID No. 802, IEPA ID No. W1550100002-04, and NID No. IL50663) and Ash Pond No. 4 (AP4; Vistra ID No. 805, IEPA ID No. W1550100002-07) (closed with IEPA approval). The Coal Combustion Waste Landfill (CCWL; Vistra ID No. 801) is also located adjacent to the EAP (**Figure 1-2**). IEPA approved the *Closure Plan* for AP2 and AP4 on February 26, 2020. Closure construction began in May 2020 and was completed in November 2020.

In addition to the CCR, there are two principal types of unlithified material present above the bedrock near the EAP. Underlying the constructed CCR SIs at the EAP are the Henry Formation sand and gravels and the clayey sands and sandy clays of the Cahokia Alluvium, which comprise the uppermost aquifer at the EAP and extend from the water table to the bedrock. Bedrock at the EAP is comprised of shales with thin limestone, sandstone, and coal beds of the Pennsylvanian-aged Carbondale Formation. Discharge of groundwater from the EAP into the Illinois River through the uppermost aquifer is the primary pathway for contaminant migration. Temporary flow reversals of groundwater may occur during periods of high river elevations or flooding.

Groundwater flow direction and gradients have not changed significantly since the first hydrogeologic study of the EAP was completed in 1983, and recent data support the established conceptual site model. The Hennepin EAP overlies high permeability sands and gravels of the uppermost aquifer that flow generally to the north under normal river conditions and reverse during periods of high river stage.

Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments: 35 I.A.C. § 845 (Part 845) parameters were monitored in the uppermost aquifer monitoring wells at the EAP as part of the groundwater quality investigations performed from 2015 to 2018. These data were supplemented with sampling of additional locations in 2021. The results indicate that the following parameters were greater than the applicable 35 I.A.C. § 845.600 groundwater protection standards (GWPSs) and are considered potential exceedances:

- Chloride – at background uppermost aquifer wells 08 and 08D;
- Cobalt – at background uppermost aquifer wells 07, 08, and 08D; at uppermost aquifer compliance well 53; and at bedrock confining unit compliance well 55;
- Lithium – at bedrock confining unit compliance well 55 in April 2021;
- pH – at background uppermost aquifer wells 07, 08, and 08D;
- Thallium – at background uppermost aquifer well 08; and at compliance uppermost aquifer well 52; and
- Total Dissolved Solids (TDS) – at background uppermost aquifer wells 08 and 08D.

Concentration results for the above parameters were compared directly to 35 I.A.C. § 845.600 GWPSs to determine potential exceedances. Potential exceedances include results reported during the background groundwater monitoring or prior period that are greater than the GWPS. The results are considered potential exceedances because the results were compared directly to the standard and did not include an evaluation of background groundwater quality or the statistical methodologies proposed in the Groundwater Monitoring Plan (GMP) provided in the Operating Permit application. Exceedances will be determined following IEPA approval of the GMP.

TABLE ES-1. PART 845 REQUIREMENTS CHECKLIST

HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Part 845 Reference	Individual Part 845 Components Reviewed for Completeness	Location of Information in HCR
845.620(b)	The hydrogeologic site characterization shall include but not be limited to the following:	--
845.620(b)(1)	Geologic well logs/boring logs;	Table 3-1 Figure 3-1 Appendix A
845.620(b)(2)	Climatic aspects of the site, including seasonal and temporal fluctuations in groundwater flow;	Sections 3.2.5 & 3.3.1 Figures 3-3 to 3-5
845.620(b)(3)	Identification of nearby surface water bodies and drinking water intakes;	Sections 3.3.2 & 5.2 Appendix E
845.620(b)(4)	Identification of nearby pumping wells and associated uses of the groundwater;	Section 5.1 Appendix E
845.620(b)(5)	Identification of nearby dedicated nature preserves;	Section 5.3 Appendix E
845.620(b)(6)	Geologic setting;	Sections 2.4 & 2.5 Figures 2-3 & 2-4
845.620(b)(7)	Structural characteristics;	Section 2.4.3 Figure 2-5
845.620(b)(8)	Geologic cross-sections;	Figure 2-8 & 2-9
845.620(b)(9)	Soil characteristics;	Section 2.3 Figure 2-2 Tables 2-1 & 2-4
845.620(b)(10)	Identification of confining layers;	Sections 2.5.2 & 3.2.1

TABLE ES-1. PART 845 REQUIREMENTS CHECKLIST

HYDROGEOLOGIC SITE CHARACTERIZATION REPORT

HENNEPIN POWER PLANT

EAST ASH POND

HENNEPIN, ILLINOIS

Part 845 Reference	Individual Part 845 Components Reviewed for Completeness	Location of Information in HCR
845.620(b)(11)	Identification of potential migration pathways;	Section 3.2.4
845.620(b)(12)	Groundwater quality data;	Section 4.2 Tables 4-1 & 4.2
845.620(b)(13)	Vertical and horizontal extent of the geologic layers to a minimum depth of 100 feet below land surface, including lithology and stratigraphy;	Section 2.5 Figures 2-8 & 2-9 Appendix A
845.620(b)(14)	A map displaying any known underground mines beneath a CCR surface impoundment;	Section 2.4.5; No map provided as there are no underground mines within 1000 meters
845.620(b)(15)	Chemical and physical properties of the geologic layers to a minimum depth of 100 feet below land surface;	Section 2.5 Tables 2-1, 2-2, & 2-4 Appendix B
845.620(b)(16)	Hydraulic characteristics of the geologic layers identified as migration pathways and geologic layers that limit migration, including:	Sections 3.2.4, 3.2.5, & 3.2.6 Tables 3-2 and 3-4 Appendices B & D
845.620(b)(16)(A)	water table depth;	Section 3.2.5 Figures 3-3 through 3-5 Appendix C
845.620(b)(16)(B)	hydraulic conductivities;	Section 3.2.6 Tables 2-1 & 3-3 Appendices B & D
845.620(b)(16)(C)	effective and total porosities;	Section 2.5.1 Table 2-1
845.620(b)(16)(D)	direction and velocity of groundwater flow; and	Sections 3.2.5 & 3.2.6 Tables 3-2 through 3-5 Figures 3-3 through 3-5 Appendix C

TABLE ES-1. PART 845 REQUIREMENTS CHECKLIST

HYDROGEOLOGIC SITE CHARACTERIZATION REPORT

HENNEPIN POWER PLANT

EAST ASH POND

HENNEPIN, ILLINOIS

Part 845 Reference	Individual Part 845 Components Reviewed for Completeness	Location of Information in HCR
845.620(b)(16)(E)	map of the potentiometric surface;	Figures 3-3 through 3-5
845.620(b)(17)	Groundwater classification pursuant to 35 I.A.C. § 620; and	Section 3.2.8

[O: CJC 07/02/21, U: CJC 09/08/21, C: LDC 09/20/21]

Notes:

-- = reference to main regulation

35 I.A.C. § 620 = Title 35 of the Illinois Administrative Code, Part 620

HCR = Hydrogeologic Characterization Report

1. INTRODUCTION

1.1 Overview

In accordance with requirements of the Part 845 (IEPA, April 15, 2021), Ramboll Americas Engineering Solutions, Inc. (Ramboll) has prepared this HCR on behalf of HPP (**Figure 1-1**), operated by Dynegy Midwest Generation, LLC (DMG). This report will apply specifically to the CCR Unit referred to as the EAP. However, information gathered to evaluate other CCR units on site regarding geology, hydrogeology, and groundwater quality is included, where appropriate. The EAP is an existing 21-acre lined CCR SI used to manage CCR and non-CCR waste streams and to clarify process water prior to discharge in accordance with the plants National Pollutant Discharge Elimination System (NPDES) permit at the HPP. This HCR includes Part 845 content requirements specific to 35 I.A.C. § 845.620(b) (Hydrogeologic Site Characterization) for the EAP at HPP.

1.2 Part 845 Description

Part 845 contains comprehensive rules for the design, construction, operation, corrective action, closure, and post closure care of these SIs. CCR is commonly referred to as coal ash, and CCR SIs are commonly referred to as coal ash ponds. This rule includes GWPSs applicable at the waste boundary at each CCR SI and requires each owner or operator to monitor groundwater. IEPA's rule includes a permitting program as well as all federal standards for CCR SIs promulgated by the United States Environmental Protection Agency (USEPA). In addition, the rules include procedures for public participation, closure alternatives analyses, closure prioritization, and provides access to records via public website. The rule also includes financial assurance requirements for CCR SIs.

A checklist summarizing the specific requirements of 35 I.A.C. § 845.620 is included in **Table ES-1**. The table provides references to sections, tables, and figures included in this document to locate the information that meets specific requirements of 35 I.A.C. § 845.620.

1.3 Previous Investigations and Reports

Numerous hydrogeologic investigations have been performed concerning the CCR Units or Multi-Units located at the HPP. The information presented in this HCR includes data collected in support of the monitoring well network established for development of the GMP and supplements comprehensive data collection and evaluations from prior hydrogeologic investigation reports (recent to oldest), including, but not limited to, the following:

- **Ramboll, March 19, 2020. Hennepin Power Plant – State Permit for Closure Plan – Log No. 2020-65026- Review Letter.**

Ramboll compiled and provided a copy of the Closure Plan (CEC, 2018) and any subsequent documents and updates with drawing sets and annotated pages which had been superseded by a later submittal.

- **Natural Resource Technology, an OBG Company (NRT/OBG), December 20, 2017. Hydrogeologic Site Characterization Report– Hennepin East Ash Pond No. 2.**

A Hydrogeologic Site Characterization report prepared in support of a Closure Plan for CCR SIs associated with AP2 within the EAPS.

- ***NRT/OBG, October 17, 2017. Hydrogeologic Monitoring Plan – Hennepin East Ash Pond System.***

A Hydrogeologic Monitoring Plan (HMP) prepared to provide background information in support of the groundwater monitoring system established to comply with Title 40 of the Code of Federal Regulations (40 C.F.R.) § 257.91 of the USEPA Final Rule to regulate the disposal of CCR as solid waste.

- ***Natural Resource Technology, Inc. (NRT) and Kelron Environmental (Kelron), December 19, 2010. New Coal Combustion Waste (CCW) Landfill, Initial Facility Report, Hydrogeologic Studies and Evaluations, Section 25 Hydrogeological Investigations.***

Provided the foundation on which the monitoring system, groundwater impact assessment, and groundwater quality standards are to be developed for inclusion with the Initial Facility Report (IFR) for the new CCWL. Forty-one borings (B-1 through B-41) were advanced near and within the footprint of the Site during February and March 2009 for Site engineering studies. Four new monitoring wells (18S, 18D, 19S and 19D) were installed along the north perimeter, downgradient of the Site. One new upgradient well (08D) was located to the south adjacent to existing well 08.

- ***NRT and Kelron, December 19, 2010. New Coal Combustion Waste (CCW) Landfill, Initial Facility Report, Hydrogeologic Studies and Evaluations, Section 27 Groundwater Impact Assessment.***

Three-dimensional numerical flow and transport modeling was used to estimate the effect of leachate seepage from the CCWL on groundwater concentrations at the downgradient edge of the zone of attenuation.

- ***NRT and Kelron, December 19, 2010. New Coal Combustion Waste (CCW) Landfill, Initial Facility Report, Hydrogeologic Studies and Evaluations, Section 28 Groundwater Monitoring Program.***

Describes the groundwater monitoring program to identify discharges from all waste disposal units (Phases) within AP2 and the leachate collection system associated with the new CCWL.

- ***NRT and Kelron, June 3, 2009. Water Well Survey, Dynegy Midwest Generation, Hennepin Power Station.***

A water well survey was performed in accordance with the "Right to Know" Potable Water Well Survey procedures of 35 I.A.C. § 1600.210(b)(1) and 35 I.A.C. § 1600.210(b)(2). The purpose of this survey was to identify water wells located within 2,500 feet of HPP property boundary.

- ***NRT and Kelron, February 2, 2009. Field Implementation Plan, New East Ash Landfill, Hennepin Power Station.***

Described the data collection and analysis to be performed to satisfy the requirements of the hydrogeologic investigation as well as complete the groundwater impact assessment and GMP.

- **Science & Technology Management, Inc. (STMI), June 1996. Investigation of Site Closure Options at Illinois Power Company's Hennepin East Ash Impoundment. Report No. STMI/135/96-02.**

A supplemental hydrogeologic characterization was conducted to further characterize the Hennepin EAPS, develop a groundwater flow and transport model, and evaluate four alternative closure options using the model. Eight new monitoring wells (10 through 17) were installed around the EAPS to augment the existing network. Six new wells were located along the intermediate berm that separates AP2 from the EAP, and two wells were located upgradient of the EAP. Field permeability tests were conducted on eight wells.

- **John Mathes & Associates (Mathes), April 19, 1983. Hydrogeologic Study, Existing Ash Ponds, Hennepin Power Plant.**

Six monitoring wells were installed, currently designated as wells 02 through 06. Well 01 was abandoned during construction of the EAP. Monitoring wells 03 through 06 are downgradient of AP2, and well 02 is an upgradient well located south of the impoundment. Grain size analyses were performed on soil samples.

A GMP is being prepared for the EAP in conjunction with this report.

1.4 Site Location and Background

The EAP is located in northcentral Illinois in Putnam County, approximately four miles northeast of the Village of Hennepin, located within the northeast quarter of Section 26, Township 33 North, Range 2 West (**Figure 1-1**). The HPP is an approximately 504-acre property consisting of 19 parcels, including a retired coal-fired power plant, CCWL and SIs, and farmland. The HPP ceased operations in 2019 when the power plant was retired.

The HPP construction history includes construction of Unit 1 in 1953 and Unit 2 in 1959 with capacities of 70 megawatts (MW) and 210 MW, respectively. The plant initially burned high-sulfur Illinois coal and switched to sub-bituminous Powder River Basin coal in 1999 (STMI, 1996).

The CCR Units located adjacent, or near, to each other in the eastern portion of the HPP are AP2, AP4, and the EAP (referred to as the Primary East Ash Pond in previous documents), and non-CCR units including the Leachate Pond (formerly Pond 2E) and the Polishing Pond (formerly Secondary Pond); all of which comprise the EAPS. The CCWL was constructed on a portion of AP2 and is included in the extent of the EAPS. The CCR Units associated with the EAPS are situated south and adjacent to the Illinois River. The area is also bounded on the east and south by industrial properties owned by Tri-Con Materials and Washington Mills, respectively (**Figure 1-2**). The HPP provides the western boundary for the CCR Units with agricultural land to the southwest. Additionally, a 9-acre parcel between the HPP property and Washington Mills (south of the CCR Units) was previously occupied by Advanced Asphalt but operations are no longer active, and the property contains several buildings. The current owner of this parcel is listed as Tri-Con Materials.

Figure 1-2 depicts the location of the CCR Units and non-CCR Units within the EAPS. The four Hennepin EAPS CCR units consist of the following: one existing landfill (CCWL), one existing SI (EAP), and two IEPA-approved, closed SIs (AP2 and AP4). Information regarding the CCWL, AP2, and AP4 CCR Units is solely for background information, as this report applies specifically to the EAP CCR Unit, which will hereinafter be referred to as the Site.

1.5 Site History and Unit Description

The EAP also referred to as the Primary EAP in previous documents, is classified as an existing lined SI. The first phase of the EAP construction occurred in 1995 when the pond bottom and sidewalls were constructed to a depth of 32 feet with a variable but lowermost bottom elevation of 458 feet above mean sea level (MSL). The bottom and sidewall liners were constructed with 48 inches of compacted clay with a hydraulic conductivity of 1×10^{-7} centimeters per second (cm/s). The sidewall liners constructed during the first phase extended 20 feet above the bottom liner and water level within the pond was limited to 15 feet above the bottom liner. The second phase of construction occurred in 2003 when the sidewall liners were raised an additional 12 feet and the total water depth was raised to approximately 30 feet. The raised sidewalls were lined with 12 inches of compacted clay having a hydraulic conductivity of 1×10^{-6} cm/s, a 45-millimeter polypropylene geomembrane, and a polypropylene geotextile fabric.

Prior to the plant closure in 2019, this 21-acre SI was used to store and dispose bottom ash, fly ash, and other non-CCR waste, and to clarify process water prior to discharge in accordance with the plant's NPDES permit (AECOM, 2017). The EAP is surrounded by a perimeter road and is bounded to the northeast by the Leachate Pond (formerly Pond 2E), to the northcentral by the CCWL, to the northwest by AP2, to the east by the Polishing Pond (formerly Secondary Pond), to the south by Washington Mills, and to the west by AP4.

The approximate dates of construction of HPP CCR Units, as identified in **Section 1.4**, are summarized in **Table A** below (AECOM, 2017).

Table A. History of Construction

Date	Event
1951 to 1952	Construction of historical Ash Pond No. 1.
1958	Construction of AP2.
Late 1960's	Construction of historical Ash Pond No. 3.
1978	Embankment raise of AP2.
1985	Embankment raise of AP2 to elevation 484 feet and Ash Pond No. 3 (Old West Ash Pond [OWAP]) to elevation 460 feet.
1988 to 1989	Embankment raise of OWAP to elevation 465 feet that merged historical Ash Pond No. 1 and Ash Pond No. 3 into one single pond and created the Old West Polishing Pond (OWPP).
1989	Embankment raise of AP2 to elevation 494 feet.
1995 to 1996	Construction of EAP.
1996	AP2 was removed from service and completely dewatered.
2003	Embankment liner raise of EAP.
2009 to 2010	Eastern portion of AP2 was removed to facilitate construction of the Leachate Pond.
2010 / 2011	Landfill Phase I cell was constructed in 2010 over placed CCR in AP2 adjacent to the Leachate Pond. In February 2011, 7,500 cubic yards of bottom ash was placed into the Phase I cell as a post-construction freeze-protection measure to protect the leachate collection system and geomembrane liner. No other material (fly ash or bottom ash) has been placed in the landfill since then.
2014	North embankment tree removal, grading, and vegetation re-establishment adjacent to AP2 and CCWL.
2020	Completed closure in-place of AP2 and AP4.

2. REGIONAL AND SITE GEOLOGY

A detailed hydrogeological investigation of the regional and local geology was completed and reported as part of the IFR (NRT and Kelron, 2010a). Significant portions of the results of the hydrogeological investigation are included in this HCR, along with supplemental information (including information sourced from previous investigations and reports identified in **Section 1.3** of this HCR) and updated as needed to satisfy the content requirements specific to 35 I.A.C. § 845.620(b).

2.1 Topography

Topography in the vicinity of the Site (**Figure 2-1**) ranges from approximately 445 feet North American Vertical Datum of 1988 (NAVD88) along the Illinois River north of the Site to 500 feet NAVD88 towards the south. There are three geomorphic features dominant in the immediate vicinity of the HPP: an upper river terrace at an elevation of about 500 to 550 feet NAVD88, a lower river terrace at an elevation of about 450 to 460 feet NAVD88, and the current river valley filled with alluvium to an elevation of about 445 feet NAVD88.

The HPP and AP2 were constructed on the original narrow lower terrace between the Illinois River and the uplands. The original lower terrace is approximately 10 to 20 feet above normal river level, or 441 feet (National Geodetic Vertical Datum of 1929 [NGVD29]) at the HPP. The EAP, Polishing Pond and AP4 were constructed on the upper terrace at an elevation of approximately 500 to 505 feet NAVD88, or 60 to 65 feet above normal river level. The EAP having been originally constructed by reshaping an existing gravel pit to form the current Unit. The elevation surrounding the gravel pit at the time of construction was described to be equal to or greater than the maximum elevation proposed for the impoundments (GZA GeoEnvironmental, Inc. [GZA], 2011). The lower road on the north side of the EAPS lies at an elevation of 480 to 485 feet NAVD88. The upper road along the top of the east berm for EAP is at an elevation of approximately 494 feet NAVD88.

The overall change in topography from pre-construction to current land surface ranges from approximately 5 to 40 feet, with the greatest elevation changes, ranging from 20 to 40 feet, occurring at the AP4 and the smallest elevation changes, ranging from 5 to 15 feet, occurring in the area now occupied by the EAP. The current drainage pattern at the Site is similar to pre-construction conditions.

2.2 Regional Geomorphology

The Site is located within Putnam County, which has an area of about 110,080 acres or 172 square miles. The county has about 25,000 acres of woodland, much of it along the Illinois River. Approximately three-fourths of the county is on the east side of the Illinois River, and one-fourth is on the west side (Soil Conservation Service [SCS], 1992).

The physiographic division in the region of the Site the Bloomington Ridged Plain section of the Central Lowland Province. The Bloomington Ridged Plain includes most of the Wisconsin Stage moraines and is characterized by low, broad morainic ridges with intervening stretches of relatively flat or gently rolling ground moraine. Drainage is generally in the initial stages of development, and most streams follow, and are eroding, in constructional depressions, many of which cross morainic ridges. The valleys of principal streams are large and have floodplains

bordered by valley-train terraces. The Illinois River has a broad, flat-bottomed valley with steep walls and is bordered by numerous steep-walled valleys with steep gradients (NRT, 2017).

2.3 Soils

Surficial soils at the Site and vicinity are shown on **Figure 2-2**, based on the soil survey performed in Putnam County in 1986 (SCS, 1992). Former soils underlying the Site are identified as Moundprairie Silty Clay Loam, Wet (No. 1480). The Moundprairie series soils consist of poorly drained, moderately permeable soils on floodplains. These soils formed in alluvium, and the soil association is well suited for and used as habitat for wetland wildlife. These soils are unsuitable for dwellings and only moderately suitable for cultivated crops, due to shallow water table and flooding.

Areas surrounding the EAP that are not designated Urban Land (No. 533) or Gravel Pits (No. 865) are predominantly classified as Wea Silt Loam (No. 398A and 398B). The Wea series consists of well drained soils on stream terraces. These soils formed in glacial outwash. Permeability is moderate in the upper part of the profile and very rapid in the lower part. Most areas of this association are well suited for and used in cultivating crops (SCS, 1992). Some areas are used as a source of sand and gravel, such as the property to the east.

2.4 Regional Geology

2.4.1 Regional Unlithified Geology

The unlithified geologic deposits covering bedrock in the region surrounding the EAP are derived from recent river deposition (alluvium), glacial outwash, and glacial till deposits. Total unlithified (drift) thickness ranges from 50 to 200 feet, generally becoming thicker with distance from the Illinois River southward from the impoundment. The geologic history of the Illinois River Valley was described in detail by Willman (1973), Hansel and Johnson (1996), and Frankie (2002).

The Illinoian and Wisconsinan glaciers repeatedly moved over the area. The Illinois River established its present position during the Woodfordian substage of Wisconsinan glaciation, which covered the area as far south as Peoria. Wisconsinan drift lies directly on bedrock as a result of repeated Woodfordian glacial episodes eroding earlier deposits of loess and glacial drift.

During the glacial retreats from the Hennepin area, numerous moraines were deposited across the Illinois Valley. Large areas between these moraines and/or the glaciers subsequently flooded from meltwaters. One such lake was glacial Lake Illinois, which formed behind the Bloomington Moraine, crossing the Illinois River valley near Peoria. Rapid melting and drainage from this area (Kankakee Flood) deepened and widened the valley, cutting an extensive terrace at an elevation of 500 to 550 feet about 14,500 years ago. These deposits (Henry Formation) are mostly fine gravel and pebbly sand and may be as much as 150 to 200 feet thick in the large terrace on which the city of Hennepin is located (areas shown as 'Mackinaw Member' on **Figure 2-3**), along with the eastern (*i.e.*, EAPS) and southeastern portion of the HPP property.

Another major flooded area formed behind the Tinley Moraine creating Lake Chicago. During downcutting of the Lake Chicago outlet about 3,000 years ago, the Chicago Outlet River deposited coarse gravel in bars on the eroded surfaces. The lower river terrace that underlies the AP2 includes deposits of the Chicago Outlet River. These deposits commonly occur about 20 to 40 feet above the Illinois River and may be up to about 50 feet in thickness. They are generally

coarser and more uniformly sorted than the higher terrace deposits that occur immediately south of the Site.

The Illinois River is currently shallowly entrenched in glacial outwash and the Chicago Outlet River deposits. Lateral erosion by the river has developed a floodplain and deposited alluvium (Cahokia Alluvium) in abandoned channels. Alluvial deposits of the modern Illinois River consist largely of clayey silt and sandy silt with lenses of sand and gravel. The alluvium, where present, is 20 to 40 feet thick, overlying thick deposits of sand and gravel of the Henry Formation. These areas (**Figure 2-3**) occur between the northernmost portion of the EAPS and the river.

2.4.2 Regional Bedrock Geology

The uppermost bedrock in the region consists of the shale with thin limestone, sandstone, and coal beds of the Pennsylvanian-age Carbondale Formation. The thickness of the Pennsylvanian rock ranges from 150 feet in the western part of Putnam County to more than 525 feet along the eastern margin of the county (Woller and Sanderson, 1976). In the vicinity of the HPP, the Pennsylvanian rocks have an estimated thickness of approximately 300 to 400 feet. Beneath the Pennsylvanian rocks are Mississippian and Devonian-age interbedded layers of limestone and shale over Silurian-age dolomite. The dolomite generally ranges in thickness from 410 to 505 feet in the immediate region (Willman, 1970; Frankie, 2002). Crevassing in the unit varies widely and well yields are inconsistent. Deeper bedrock units beneath the Silurian-age dolomite consist of the following in descending order (Woller and Sanderson, 1976; Frankie, 2002):

- Maquoketa Shale Group of Ordovician age, composed primarily of blue to green shales with some limestone and dolomite layers, occurs at depths of less than 1,000 feet in the northwest part of Putnam County to 1,200 feet in southern Putnam County, with a thickness generally ranging from 155 to 240 feet. This shale is an aquitard between the Silurian dolomite and deeper dolomite and sandstone aquifers.
- Ordovician age dolomite and sandstone aquifers, including the following:
 - Galena-Platteville Dolomite Group at depths of about 1,150 feet in northwest Putnam County to about 1,400 feet in the southeast, ranging in thickness from 320 to 380 feet.
 - Glenwood-St. Peter Sandstone at depths of about 1,450 feet in west Putnam County near the Site to 1,750 feet in the southeast part of the county, ranging in thickness from about 120 to 170 feet.
 - Dolomite with some shale and sandstone beds below depths of 1,750 to 1,800 feet near the Site, principally consisting of the Shakopee (130 to 150 feet thick), New Richmond (approximately 165 feet thick), and the Oneota (approximately 215 feet thick) formations.
- Cambrian age dolomite and sandstone aquifers, including the Iron-ton-Galesville and Elmhurst-Mt. Simon formations.
- Precambrian age igneous and metamorphic.

A generalized stratigraphic column for the Hennepin region is provided in **Figure 2-4**.

2.4.3 Structure

The major geologic structural features around Illinois are shown on **Figure 2-5**. The HPP is located within a relatively stable region of the continent within the north-central portion of the Illinois Basin. Rock units to the northeast of the Site form the La Salle Anticlinorium where folds are expressed in synclines, anticlines, arches, and monoclines present in the area (Nelson 1993;

Nelson 1995). The Paleozoic bedrock strata, consisting of Pennsylvanian and older rocks, have a southwestern regional dip of approximately 15 to 30 feet per mile due to the effects of the anticlinorium. Variations to the bedrock dip occur in areas where there are local structures. The anticlinorium has subparallel anticlines, domes, monoclines, and synclines, which can change local dip and strike of bedrock units (Nelson, 1995).

2.4.4 Seismic Setting

A review of the available data from the United States Geological Survey (USGS), Illinois State Geological Survey (ISGS) and other available structural information was completed by Haley & Aldrich, Inc. (Haley & Aldrich) (2018) for the Location Restriction Demonstration to address the requirements of 40 C.F.R. § 257.62 (Fault Areas) of the USEPA rule entitled *Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities*. The review found that a series of four unnamed faults associated with the Troy Grove Dome are located approximately 11 miles northeast of the HPP, near the La Salle Anticline Belt (**Figure 2-5**).

Additionally, the Sandwich Fault Zone is located approximately 35 miles northeast of the Site. Vertical displacement on the Sandwich Fault Zone ranges from 150 to 800 feet. The fault zone is downthrown to the northeast. Due to the depth of burial by Quaternary sediments and the lack of well or seismic data, detailed information about the fault zone is unavailable. Although depicted as a single fault on this map, evidence from surrounding counties indicates that the Sandwich Fault Zone is a complex configuration of many faults of varying direction and amount of displacement (Kolata et al., 1976).

The Plum River Fault Zone is a 112-mile long, east-west trending zone of high-angle faulting in east-central Iowa and northwest Illinois, roughly 60 miles northwest of the Site. The north side of the fault zone is downthrown, with documented net vertical displacements of Silurian strata up to 270 feet. The physical relationships of Pennsylvanian deposits to the Plum River Fault Zone are not known with sufficient precision to preclude up to 33 feet of post-Pennsylvanian displacement. Historic data are inadequate to evaluate the potential for seismic hazard associated with the Plum River Fault Zone (Bunker et al., 1985). USGS seismic hazard maps show no enhanced ground acceleration in the Plum River Fault Zone vicinity.

The Haley and Aldrich review found that the timeframe of the most recent activity for the four unnamed faults near the La Salle Anticline Belt is not known. Available geologic data and information indicate that there have been no active faults or fault damage zones that have had displacement in the current Holocene time reported within 200 feet of the EAP (Haley & Aldrich, 2018).

As required in 35 I.A.C. § 845.330, existing and new CCR SIs and lateral expansions of existing landfills must not be located in seismic impact areas, unless owners or operators demonstrate that the unit is designed to resist the maximum horizontal acceleration (g) in lithified earth material. The definition of a seismic impact zone, per 40 C.F.R. § 257.53 is "areas having a 2 percent or greater probability that the maximum expected horizontal acceleration in hard rock, expressed as a percentage of the earth's gravitational acceleration, will exceed 0.10 g in 50 years." The Haley and Aldrich review utilized raw data from the 2014 USGS Hazard Map to calculate that the maximum expected horizontal acceleration for 2 percent probability of exceedance in 50 years at the EAP is 0.07 g (Haley & Aldrich, 2018). The Site is therefore not within a seismic impact area, as currently defined in 35 I.A.C. § 845.330 and a demonstration

that the structural components have been designed to resist the maximum horizontal acceleration for the EAP is not required.

2.4.5 Mining Activities

Based on the directory of coal mines for Putnam County (ISGS, 2006), the nearest coal mines in the vicinity of the HPP are located approximately three miles to the northeast and four miles to the southeast. These mines, identified as the Lacey Mine (ISGS Index No. 8) and the St. Paul Mine (ISGS Index No. 298), are both abandoned underground shaft mines that used the longwall method of mining, essentially removing all of the coal. The Lacey Mine was active from 1883 to 1890, and the coal seam at this mine ranged from 28 to 42 inches in thickness. The St. Paul Mine, and later the Prairie State Mine, operated from 1905 to 1925 and from 1930 to 1939. The coal seam at this location ranged from 42 to 66 inches in thickness.

The coal mined is the Colchester Seam, also known as the No. 2 and LaSalle Seam. The Colchester Seam is located within the lower portion of the Carbondale Formation, which is the shallowest coal mined in the region. In the vicinity of the Site, the Colchester Coal occurs at a depth of approximately 200 to 300 feet.

2.4.6 Industrial Activities

As indicated in **Section 1.4**, the surrounding areas include industrial properties to the east and south of the impoundments with agricultural land to the southwest and the HPP to the west (**Figure 1-2**). The industrial properties are:

- Tricon Materials is located immediately east of the Site at 13559 Esk Street. Tricon Materials is an aggregate business providing various fill and washed sand, gravel, crushed rock, rock and boulder products.
- Washington Mills is located south of the impoundment at 13230 Esk Street. They are the largest producer and distributor of abrasive grains and specialty electro-fused minerals in North America.
- Between the HPP property and Washington Mills north of Esk Street is a 9-acre parcel that was previously occupied by Advanced Asphalt. Operations are no longer active and the property includes several abandoned buildings. The current owner of this parcel is listed as Tri-Con Materials.

2.5 Site Geology

A field investigation was performed in 2021 to collect additional data for the discussion of vertical and horizontal lithology, stratigraphy, chemical properties, and physical properties of geologic layers to a minimum of 100 feet below ground surface (bgs) as specified in 35 I.A.C. § 845.620(b). Field investigation locations are shown on **Figure 2-6**.

2.5.1 Site Specific Unlithified Geology

The stratigraphy within and immediately surrounding the EAP consists of the following in descending order; fill material and CCRs, unlithified river alluvium (Cahokia Alluvium), and Pleistocene-age glacial outwash deposits (Henry Formation) overlying Pennsylvanian-age shale bedrock (Carbondale Formation). Boring logs, monitoring well and piezometer construction forms obtained from investigations at the EAP are provided in **Appendix A**.

2.5.1.1 Fill and CCRs

Surficial soils encountered at most boring locations at the Site are coal ash fill and man-made berms constructed of a variety of locally available materials, primarily sand, gravel, and coal ash. Where undisturbed or partially excavated, the surficial soils at the Site (**Figure 2-2**) are poorly drained, moderately permeable Moundprairie Silty Clay Loam, Wet (No. 1480) formed in alluvium on floodplains.

CCR within the EAP is comprised predominantly of fly ash and bottom ash. Soil borings performed within the EAP (XPW01, XPW02, and XPW03) and the EAP Construction Documents indicate the base grade elevation of ash is as low as 464 feet NAVD88 and generally flat (**Figure 2-7**). Ash is present within the EAP at a thickness of up to 37.6 feet, as measured in XPW03 (**Appendix A**). Groundwater elevations measured in February through August 2021 showed typical water elevations in wells within the EAP (XPW01, XPW02, and XPW03) to be near 490.8 feet NAVD88. A maximum thickness of saturated fill and CCRs was observed at 32.2 feet in July 2021. The amount of saturated fill and CCRs in the EAP is generally consistent, ranging from 24.9 feet to 32.2 feet between February and August 2021.

Seven samples were obtained from the ash within borings XPW01, XPW02, and XPW03 (**Figure 2-6**). Geotechnical analysis of four of the ash samples yielded Unified Soil Classification System (USCS) soil classifications of silt. Previous geotechnical analyses of samples within the fill material along the embankments of the EAP yielded a USCS soil classification of lean clay (AECOM, 2016). The results of the geotechnical analysis performed in 2021 are summarized below and in **Table 2-1** and the geotechnical laboratory report is provided in **Appendix B**.

- The moisture content ranged from 31.0 to 177.0 percent, with an average moisture content of 111.8 percent.
- The total porosity (calculated) ranged from 51.7 to 82.7 percent with an average total porosity (calculated) of 70.3 percent.
- The dry density ranged from 28.0 to 79.0 pounds per cubic foot (pcf), with an average dry density of 49.6 pcf.
- The specific gravity ranged from 2.59 to 2.86, with an average specific gravity of 2.65.
- The distribution of particle sizes was 0 to 14.1 percent gravel, 13.7 to 83.1 percent sand, and 6.8 to 86.3 percent fines (silt and clay). The material is on average 4.1 percent gravel, 36.0 percent sand, and 59.9 percent fines (silt and clay).
- The vertical hydraulic conductivity ranged from 1.7×10^{-4} to 2.9×10^{-4} cm/s, with a geometric mean vertical hydraulic conductivity of 2.1×10^{-4} cm/s.

Solids samples were collected from XPW01, XPW02, and XPW03 for chemical analysis. The results of solid samples collected from within the EAP are summarized in **Table 2-2**.

Leachate wells were installed in XPW01, XPW02, and XPW03 and porewater samples were collected for chemical analysis. The results of porewater samples collected from the EAP are summarized in **Table 2-3**.

2.5.1.2 Cahokia Alluvium

These are the alluvial sediments deposited in abandoned channels from relatively recent lateral erosion by the Illinois River. Cahokia Alluvium was observed at boring locations MW52, MW53, and MW55 in 2021 (**Appendix A**). The Cahokia Alluvium at the EAP consist predominantly of

sandy and silty lean clay to lean clay with sand with interbedded sands and gravels. These deposits extend to elevations near 477 feet NAVD88 at the EAP and thicknesses range from approximately 9.5 feet at well 52 to 14.5 feet at well 54.

Three samples were collected from the Cahokia Alluvium for geotechnical testing within borings MW52, MW53, and MW55. Geotechnical analysis of the three Cahokia Alluvium samples yielded USCS soil classifications of lean clay and clayey sand. Boring locations are depicted on **Figure 2-6**. The results of the geotechnical analysis are summarized below and in **Table 2-1** and the geotechnical laboratory report is provided in **Appendix B**.

- The moisture content ranged from 13.7 to 21.4 percent, with an average moisture content of 16.5 percent.
- The total porosity (calculated) ranged from 28.3 to 43.1 percent with an average total porosity (calculated) of 35.7 percent.
- The dry density ranged from 95.0 to 120.0 pcf, with an average dry density of 108.0 pcf.
- The specific gravity ranged from 2.68 and 2.72, with an average specific gravity of 2.69.
- The distribution of particle sizes was 0.7 to 12.4 percent gravel, 21 to 39.6 percent sand, and 48 to 78.3 percent fines (silt and clay). The material is on average 7.6 percent gravel, 33.3 percent sand, and 59.1 percent fines (silt and clay).
- The vertical hydraulic conductivity ranged from 2.4×10^{-8} to 1.5×10^{-7} cm/s, with a geometric mean vertical hydraulic conductivity of 6.3×10^{-8} cm/s.

Soil samples from the Cahokia Alluvium were also submitted to an analytical laboratory for chemical analysis. The results of the chemical analysis are summarized in **Table 2-4**.

2.5.1.3 Henry Formation

The Henry Formation consists of the glacial outwash deposits comprising the low-level terraces, up to about 40 feet above the Illinois River. Thicknesses of Henry Formation deposits within the EAP ranged from approximately 21 feet at well 52 to approximately 45 feet at well 55. These materials extend to the top of bedrock and are dominated by gravelly soils. Beneath the pond berms and surficial veneer of clay, granular deposits were encountered for nearly the full depth of all boring logs on the Site. These granular deposits are primarily gravel containing sand and lesser amounts of boulders, cobbles, and fines.

Two samples were collected from the Henry Formation within borings MW53 and MW55. Geotechnical analysis of one of the Henry Formation samples yielded a USCS soil classification of clayey to silty gravel. Boring locations are depicted on **Figure 2-6**. The results of the geotechnical analysis are summarized below and in **Table 2-1** and the geotechnical laboratory report is provided in **Appendix B**.

- The moisture content ranged from 8.2 to 9.9 percent, with an average moisture content of 9.1 percent.
- The total porosity was not calculated for the two samples from the Henry Formation.
- The dry density was not calculated for the two samples from the Henry Formation.
- The specific gravity analysis from the boring at MW55 (50 to 52 feet bgs) resulted in a specific gravity of 2.72.

- The distribution of particle sizes was 48.9 to 60 percent gravel, 23.2 to 42.8 percent sand, and 8.3 to 16.8 percent fines (silt and clay). The material is on average 54.5 percent gravel, 33 percent sand, and 12.6 percent fines (silt and clay).
- The vertical hydraulic conductivity was not calculated for the two samples from the Henry Formation.

Soil samples from the Henry Formation were also submitted to an analytical laboratory for chemical analysis. The results of the chemical analysis are summarized in **Table 2-4**.

Four continuously sampled borings (08D, 18D, 19D, and 55) were drilled to confirm the local stratigraphy and hydrogeologic setting information. These borings fully penetrated the Cahokia Alluvium and Henry Formation into the shale bedrock underlying the unconsolidated sediments in the EAP. Boring 08D extended 30 feet below the bottom of the Henry Formation and boring 55 extended approximately 15 feet below the bottom of the Henry Formation, which comprises the uppermost aquifer.

Geologic cross-sections across of the study area (**Figure 2-8**) includes one southwest-northeast line and one northwest-southeast line. AP2 is located over the original narrow lower terrace between the Illinois River and the uplands. The original lower terrace is approximately 10 to 20 feet above normal river level of 441 feet NGVD29 (**Figure 2-8** cross-section B-B'). The EAP, Polishing Pond and AP4 were constructed on the upper terrace at an elevation of approximately 500 to 505 feet NGVD29, or 60 to 65 feet above normal river level (**Figure 2-8** cross-section B-B').

2.5.2 Site Specific Bedrock Geology

The uppermost bedrock at the HPP, including the EAPS, is the Pennsylvanian Carbondale Formation (Kolata, 2005), which consists of shale with thin limestone, sandstone, and coal beds (**Figure 2-4**). The bedrock surface elevation ranges from 400 and 450 feet above mean sea level (Herzog et al., 1994). Three deeper borings (08D, 18D, and 55) around the perimeter of the EAPS confirm the presence of shale bedrock at elevations from 400 and 410 feet NAVD88. The top of bedrock at well 55 was described as grayish green silty shale. The elevation of the top of bedrock (**Figure 2-8**) is highest at well 55 (410.2 feet NAVD88) and drops to the north toward well 18D (399.2 feet NAVD88). Well logs for former production wells at the power plant indicate shale bedrock at an elevation of roughly 350 feet (NRT/OBG, 2017a).

Details on the occurrence and characteristics of regional bedrock are provided **Section 2.4.2**. A brief description of bedrock in the area near the EAP is as follows:

Bedrock below the Site is composed of the Pennsylvanian-age Carbondale Formation, which defines the base of the unlithified deposits (and uppermost aquifer) underlying both the Site and the entire EAPS and is regarded as the first confining unit beneath the uppermost aquifer. Water-bearing openings are extremely variable from place to place and are best developed near the surface in thin limestones and sandstones, when present within the predominantly shale formation. Near the HPP, the Pennsylvanian rock has an estimated thickness of approximately 300 to 400 feet.

Bedrock samples from the Carbondale Formation were submitted to an analytical laboratory for chemical analysis. The results of the chemical analysis are summarized in **Table 2-4**.

3. REGIONAL AND LOCAL HYDROGEOLOGY

3.1 Regional Hydrogeology

3.1.1 Unlithified Deposits Hydrogeology

Regional groundwater flow in the unlithified deposits above the shale bedrock discharges into the Illinois River. Depth to the water table is typically greater than 20 feet bgs around the Site. The water table elevation can vary significantly, depending on the river stage. During flood stages, exfiltration from the river may temporarily recharge groundwater close to the river and the water table beneath the Site may rise to levels similar to river elevations.

The Henry Formation outwash deposits have high hydraulic conductivity compared to the underlying bedrock. Pump test and specific capacity data were obtained for five high capacity industrial and municipal wells screened in the unlithified deposits along the Illinois River within several miles of the HPP (Illinois State Water Survey [ISWS], 1989). Hydraulic conductivity of the Henry Formation sand and gravel ranged from 5×10^{-2} to 3×10^{-1} cm/s with a median of 1×10^{-1} cm/s. Pumping rates ranged from 125 to 1,570 gallons per minute (gpm) and the tests were conducted over periods ranging from 30 minutes to 24 hours. Effective porosity typically ranges from 20 to 35 percent for poorly sorted sand and gravel alluvial deposits (Walton, 1988; Fetter, 1980).

Hydraulic conductivity of the alluvial deposits, generally consisting of lower permeability materials (*i.e.*, silt, silty sand, and clay), will typically be several orders of magnitude lower than the more permeable outwash sand and gravel deposits of the Henry Formation. However, no published regional data is available specifically for the shallow alluvial deposits. Silt, clay, and mixtures of sand, silt, and clay typically have horizontal hydraulic conductivity ranging from 10^{-4} to 10^{-7} cm/s (United States Department of Interior [DOI], 1981; Fetter, 1980).

3.1.2 Bedrock Hydrogeology

The Pennsylvanian rocks in the region are not considered a municipal or subdivision water supply source. (Gibb et al., 1977). Water-bearing openings are extremely variable from place to place and are best developed near the surface in thin limestones and sandstones, when present within the predominantly shale formation. In the bedrock upland areas away from the Illinois River, farm and domestic water supplies are obtained locally from sandstone and creviced limestone in the upper 250 feet of these rocks (Woller and Sanderson, 1976). When present, the limestone and sandstone units yield less than 10 gpm (Visocky, et al., 1985). Water quality within the bedrock varies considerably and it becomes highly mineralized with increasing depth. As a result, the Pennsylvanian bedrock is not a reliable source of groundwater.

The Pennsylvanian rocks generally have low porosity and hydraulic conductivity. The porosity of shale typically ranges from 1 to 20 percent (Walton, 1988). Representative horizontal hydraulic conductivity for shale typically ranges from 5×10^{-6} to 5×10^{-10} cm/s. Representative vertical hydraulic conductivity ranges for shale are 5×10^{-8} to 5×10^{-12} cm/s (Walton, 1988). Recharge to the Pennsylvanian rocks is derived locally from vertical leakage through the glacial drift and other unlithified materials that are in turn recharged from precipitation. Deeper bedrock units beneath the Pennsylvanian rocks and their water-bearing properties (Woller and Sanderson, 1976) are as follows:

- Silurian dolomite, which may provide water to wells in moderate quantities from cracks and crevices, but is too mineralized for most uses;
- Maquoketa Group of Ordovician age composed of non-water-bearing shales and acts as an aquitard between the Silurian dolomite and deeper water-bearing units; and
- Cambrian-Ordovician Aquifer (also known as Midwest Bedrock Aquifer), composed of the Ironton-Galesville aquifer at the base of this group up through the Glenwood-St. Peter Sandstones. These formations are the major bedrock aquifer and principal water producing zones in the region capable of yielding moderate quantities of groundwater (Visocky, et al., 1985).

In the region surrounding the Site, these bedrock aquifers provide municipal water supply sources.

3.2 Site Hydrogeology

Prior to 2015, there were 21 monitoring wells located around the EAPS for monitoring groundwater. Wells 46 and 47 were installed in 2015 to further evaluate groundwater surrounding the EAP and meet the requirements of 40 C.F.R. § 257. Four new monitoring wells (52, 53, 54, and 55) were installed in 2021 around the perimeter of the EAP to meet requirements of Part 845. Construction details for monitoring wells and piezometers within the HPP are provided in **Table 3-1** and depicted in **Figure 3-1**. Boring logs, monitoring well and piezometer construction forms are provided in **Appendix A**.

3.2.1 Hydrostratigraphic Units

Two distinct water-bearing units have been identified at the Site based on stratigraphic relationships and common hydrogeologic characteristics, which are summarized below in descending order:

- **Uppermost Aquifer:** The Illinois River is immediately adjacent to the lower terrace, east of the Site, and there is minimal Cahokia Alluvium between the Site and the river. The Cahokia Alluvium, also described in detail in **Section 2.5.1.2**, consists of river deposits of fine-grained silts and clays. The estimated thickness of the alluvium at the EAP is 20 to 40 feet.

The highly permeable Henry Formation sands and gravels make up the upper and lower terraces and fill the valley beneath the alluvium. The sand and gravels of the two terraces are indistinguishable, consisting of a heterogeneous mixture of silty-sandy gravel, with cobble zones and with boulders up to several feet in diameter. The Henry Formation is more than 100 feet thick in the river valley and at least 130 feet thick on the upper terrace.

- **Bedrock Confining Unit:** The thick and low permeability shales with thin limestone, sandstone, and coal beds of the Carbondale Formation underlie the uppermost aquifer at the EAP.

3.2.2 Uppermost Aquifer

The uppermost aquifer is comprised of the silty-sandy gravel with boulders, classified as Henry Formation, and the overlying river-laid fine-grained silts and clays of the Cahokia Alluvium. These deposits combined are slightly more than 80 feet thick directly beneath the Site. The lower 45 feet are saturated. Observed groundwater elevations seasonally fluctuate by about 3 to 7 feet. The top of the uppermost aquifer is presented in **Figure 3-2**.

This uppermost aquifer extends laterally about 7,000 feet upgradient of the EAP to the south where clay-rich glacial till is encountered. Glacial tills in the region typically yield little water.

3.2.3 Bedrock Confining Unit

The base of the uppermost aquifer is the top of the uppermost bedrock, the shale of the Pennsylvanian-age Carbondale Formation. This shale unit is estimated to have a thickness of approximately 300 to 400 feet. Borings for monitoring wells 08D and 55 extend into the bedrock as far as 30 feet. As described in **Section 3.1.2**, the horizontal hydraulic conductivity of the shale bedrock generally ranges from 5×10^{-6} cm/s to 5×10^{-10} cm/s with low porosities (ranging from 1 to 20 percent) and low vertical hydraulic conductivities (ranging from 5×10^{-8} to 5×10^{-12} cm/s). However, the one slug test result obtained for the uppermost (*i.e.*, weathered) shale at the Site yielded a higher horizontal hydraulic conductivity value of 3.6×10^{-5} cm/s.

3.2.4 Potential Migration Pathways

The potential pathways for contaminant migration at the Site have been fully characterized and defined in **Section 3.2**. The glacial outwash sand and gravel (Henry Formation) and Cahokia Alluvium comprise the uppermost aquifer at the Site. The hydrogeology of the Site has been fully characterized spatially and temporally under recharge/discharge conditions of the Illinois River. Groundwater from the vicinity of the CCR unit flows toward the Illinois River through the uppermost aquifer as the primary pathway for potential groundwater contaminant migration. Due to the unlithified, granular nature of this aquifer, macro-pore flow through fractures or other conduits does not occur and evidence of such flow was not observed. Vertical migration is limited by the underlying Pennsylvanian-age shale bedrock unit, which acts as a confining layer. No potential migration pathways have been identified other than the uppermost aquifer.

3.2.5 Water Table Elevation and Groundwater Flow Direction

Groundwater flow has been monitored since the 1980s. Groundwater flow is represented using groundwater elevation contour maps for sampling events conducted in 2021 (**Figures 3-3** through **3-5**). The EAP is upgradient of the CCWL and AP2 and the groundwater elevation in wells surrounding the EAP averaged 448.9 feet NAVD88 from February to August 2021.

Groundwater elevations are primarily controlled by river stage of the Illinois River near the Site. Typically, groundwater from the Site flows from south to north and discharges to the Illinois River (**Figure 3-3**). Under high river stage events or flooding, flow direction can be reversed (*i.e.*, groundwater flows in a south to southwest direction) near the river for limited durations (**Figures 3-4** and **3-5**). Flow reversals have not been observed to extend south beyond the EAP (**Appendix C** and **Figures 3-3** through **3-5**). Seasonal variation of groundwater levels and flow direction near the CCR Units are depicted in the series of 2015 through 2020 groundwater elevation contour maps (**Appendix C**). Flow reversals and the impact of river stage are further discussed in **Section 3.2.5.3**.

3.2.5.1 Vertical Hydraulic Gradients

Vertical hydraulic gradients were calculated using available groundwater elevation data from February to August 2021 at nested well locations within the uppermost aquifer. Vertical hydraulic gradients for the EAP are presented in **Table 3-2** and summarized below:

- Vertical hydraulic gradients between upgradient wells 08 and 08D averaged slightly downward at 0.0045 feet per foot (ft/ft) and ranged from -0.0017 to 0.0086 ft/ft.
- Vertical hydraulic gradients between well nests downgradient and adjacent to the north edge of the EAP (12, 13, and 55) were variable and averaged slightly downward at 0.0059 ft/ft.

- Vertical hydraulic gradients between downgradient wells 12 and 13 were generally flat, with an average vertical gradient at -0.0013 ft/ft and ranged from -0.0068 ft/ft to 0.0015 ft/ft.
- Vertical hydraulic gradients between downgradient wells 12 and 55 averaged slightly downward at 0.0081 ft/ft and ranged from -0.0138 to 0.0495 ft/ft.
- Vertical hydraulic gradients between downgradient wells 13 and 55 averaged downward at 0.0104 ft/ft and ranged from -0.0223 to 0.0764 ft/ft.

The slightly downward vertical hydraulic gradients observed between wells 08 and 08D and the generally flat-to-upward vertical gradients observed between wells 12 and 13 are consistent with gradients reported in NRT/OBG's *Hydrogeologic Site Characterization Report* (NRT/OBG, 2017a). Based on these observations and the physical characteristics of the uppermost aquifer, vertical groundwater gradients do not appreciably affect the horizontal migration of dissolved constituents.

3.2.5.2 Impact of Existing Ponds and Ash Saturation

The phreatic surface measured from February through August 2021 in the EAP ranges from approximately 477.7 to 492.2 feet NAVD88 while groundwater elevations measured in monitoring wells surrounding the EAP and screened within the uppermost aquifer range from approximately 446.1 to 457.1 feet NAVD88. Groundwater elevation contours of the uppermost aquifer (**Figure 3-3**) illustrate flow towards the north and discharging at the Illinois River. The absence of a radial component of flow outward indicates that the EAP does not significantly impact flow direction. The EAP is lined as described in **Section 1.5**. The flat horizontal groundwater gradient beneath this area (**Section 3.2.7**) and the small and inconsistent upward/downward vertical gradients between wells 13 and 55 (**Table 3-2**) suggests the EAP and neighboring ponds are not areas of increased recharge or infiltration.

3.2.5.3 Impact of River Stage on Groundwater Flow

The river basin experiences annual spring flooding during the months of March, April, May, and sometimes June, while lesser flooding occasionally occurs during autumn. River stage during high precipitation and/or flood events seasonally rises above adjacent groundwater elevations and groundwater gradients will temporarily reverse in response to the river temporarily recharging the aquifer. Groundwater gradient reversals are observed on the quarterly groundwater elevation contour maps for March and April 2021 (**Figures 3-4** and **3-5**). During these events, the groundwater flow direction reverses, moving south to southeasterly across a portion of the Site. A moderate horizontal gradient reversal of about 0.003 ft/ft was observed in April 2021. The groundwater flow reversals are typically limited in duration and extent.

Figure A below compares the groundwater hydrograph recorded at former well 14 with the river hydrograph recorded at the HPP (STMI, 1996). Well 14 was located adjacent to wells 12 and 13 between the CCWL and EAP (**Figure 3-1**). This graph shows that groundwater elevations respond rapidly to major flood events where river elevations rise above adjacent groundwater levels. It also indicates that groundwater levels, at least as far as the south side of AP2, can be expected to rise temporarily in response to river flooding to elevations similar to those observed at the river.

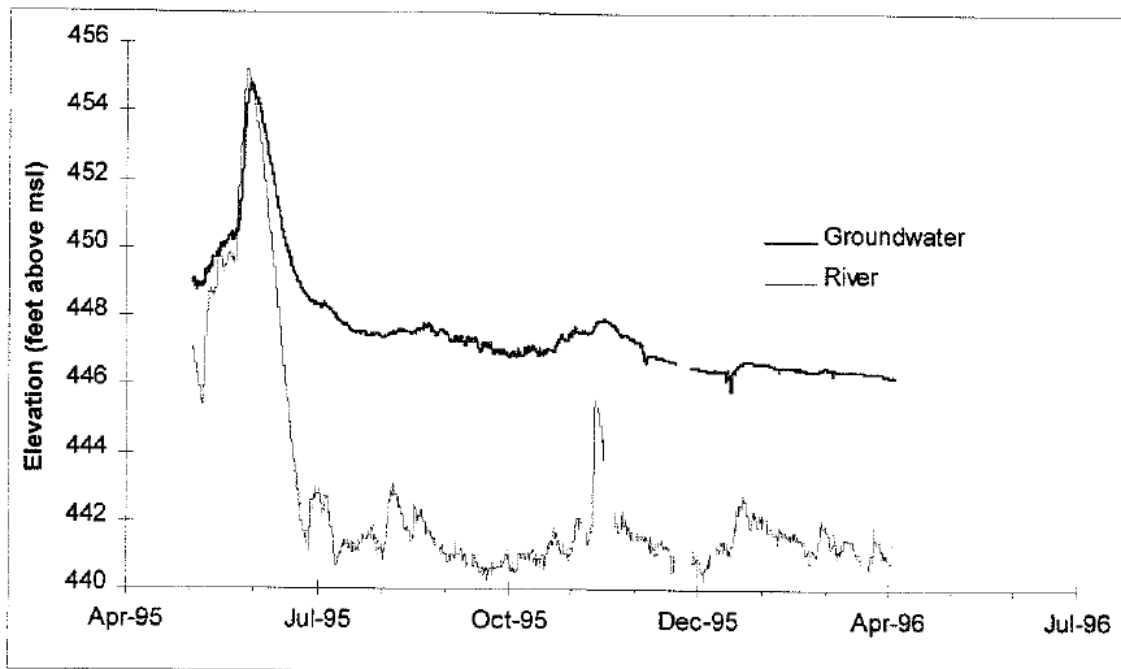


Figure A. Hydrograph Comparison for Well 14 and the Illinois River (STMI, 1996).

The relationship between the Illinois River and the EAPS was further discussed in the River Flood Evaluation Report (Ramboll, 2020) included as Addendum 3 to the Closure Plan. Explicit simulation of flood events indicates that potential increases in simulated concentration from flooding of the Illinois River are small and transient, such that long-term concentrations will not be affected (*i.e.*, flooding events are not sufficiently impactful to require incorporation in the prediction model for AP2 and AP4). The EAP is located within the same geologic and hydrogeologic system as AP2 and AP4; therefore, flow reversals are not expected to have a significant impact on long-term concentration trends at the EAP.

3.2.6 Hydraulic Conductivity

3.2.6.1 Field Hydraulic Conductivity

Field hydraulic conductivity tests performed at wells in the uppermost aquifer at the EAP were completed as part of the 2021 field investigation and these data were supplemented with results from field hydraulic conductivity tests performed in 2017 as part of NRT/OBG's *Hydrogeologic Site Characterization Report* (NRT/OBG, 2017a). Hydraulic conductivity tests and results from 2017 and 2021 are summarized in **Table 3-3** and 2021 analyses are provided in **Appendix D**.

Results of field hydraulic conductivity tests conducted in 2021 in the leachate monitoring wells (XPW01, XPW02, and XPW03) ranged from 7.7×10^{-3} to 5.2×10^{-2} cm/s with a geometric mean of 1.9×10^{-2} cm/s (**Table 3-3**).

The Henry Formation sands and gravels at the Site are highly permeable with measured hydraulic conductivity ranging from 1.6×10^{-3} to 3.2×10^{-0} cm/s and a geometric mean of 8.4×10^{-2} cm/s (**Table 3-3**). At several monitoring well locations, water levels recovered as fast as the slug was removed and no drawdown recovery measurements could be made by the transducer. These values are consistent with pump test data from area high-capacity wells screened in the

unlithified deposits which ranged from 5×10^{-2} to 3×10^{-1} cm/s. Hydraulic conductivity within the shale bedrock lower confining unit, as measured at well 55, is 3.6×10^{-5} cm/s (**Table 3-3**).

Pump test data from the fire well installed at the power plant in 1968 was also available to estimate the permeability of the Henry Formation. This fire well is located at the southwest corner of the plant and was drilled to a depth of 112 feet, terminating on shale. The lower 30 feet of the well is screened within unlithified deposits. The well log is contained in NRT and Kelron's *Water Well Survey* (2009a). The pump test hydraulic conductivity result reported by Mathes (1983) was 1.3×10^{-1} cm/s. No vertical hydraulic conductivity pattern was discerned from the slug test data. Horizontal hydraulic conductivity appears consistently higher, on the order of 10^0 to 10^{-1} cm/s in an east-west trending line under the EAP and Polishing Pond. These high hydraulic conductivities coincide with a very flat hydraulic gradient.

A moderately steep horizontal gradient (average of 0.0028 ft/ft) between wells 07 and 08 (**Table 3-4**) suggests that the hydraulic conductivity upgradient of the Site in the upper terrace deposits may be locally somewhat lower, based on the occurrence of finer-grained materials noted in the boring log for well 07.

3.2.6.2 Laboratory Hydraulic Conductivity

Falling head permeability tests (ASTM D5084 Method F) were performed in the laboratory on samples collected during the 2021 investigations. Sample locations are shown on **Figure 2-6**. The geotechnical laboratory report is provided in **Appendix B** and the results are summarized in **Table 2-1**. Laboratory measurements indicated vertical hydraulic conductivity for the uppermost aquifer ranged from 1.5×10^{-7} cm/s to 7.1×10^{-8} cm/s, with a geometric mean for all three samples of 6.4×10^{-8} cm/s.

3.2.7 Horizontal Hydraulic Gradients and Groundwater Flow Velocities

Groundwater elevations have been measured quarterly since 2008. The Illinois River is the regional groundwater discharge area. Under normal conditions at the Site, groundwater flows from south to north toward the river as shown on **Figure 3-3**. Additional water table contour maps for 2015 through 2020 are available in **Appendix C**.

Horizontal hydraulic gradients are typically moderate (0.0013 to 0.0062 ft/ft) as groundwater approaches the Site south of the EAP (**Table 3-4**). The horizontal gradient becomes nearly flat beneath the EAP (no gradient to 0.0012 ft/ft) before steepening slightly between the Site and the Illinois River (**Table 3-4**). The flattening of the horizontal gradient is attributed to the highly permeable sand and gravel that runs continuously along the south perimeter of the EAPS, as illustrated in cross sections A-A' and B-B' (**Figure 2-8**).

Horizontal groundwater flow at the base of the uppermost aquifer also moves from south to north towards the Illinois River, based on hydraulic head measurements in monitoring wells 08D and 18D. Horizontal gradients at depth are similar to those beneath the EAP, averaging 0.0003 ft/ft from February to August 2021 (**Table 3-4**).

Groundwater flow in the uppermost aquifer under normal flow conditions generally from south to north across the Site (**Figure 3-3**) towards the Illinois River. Groundwater flow velocity calculations are provided in **Table 3-4**, and a summary of velocities at the EAP from February to August 2021 under normal flow conditions is provided below:

- East of the EAP (between wells 17 and 19S): groundwater flow velocities ranged from approximately 0.5 feet per day (ft/day) in March 2021 to 3.0 ft/day in May 2021, with an average groundwater velocity of 2.0 ft/day. Groundwater velocities, as measured between wells 17 and 12, to the east of the EAP were from approximately 0.5 ft/day to 0.7 ft/day (NRT/OBG, 2017a).
- West of the EAP (between wells 53 and 52): groundwater flow velocities ranged from 0.03 ft/day in May 2021 to 0.1 ft/day in February 2021.
- Below the EAP (between wells 16 and 54): groundwater flow velocities ranged from 0.3 ft/day in February 2021 to 10.6 ft/day in April 2021, with an average groundwater velocity of 3.6 ft/day.
- Base of the uppermost aquifer (between wells 08D and 18D): groundwater flow velocities ranged from 0.2 ft/day in March 2021 to 1.0 ft/day in August 2021, with an average groundwater velocity of 0.6 ft/day.

Flow reversals were observed in the velocity calculations in the areas west (between wells 53 and 52) and north (between wells 54 and 18S) of the EAP during monitoring events occurring in March, April, June, July, and August 2021 (**Table 3-4**).

3.2.8 Groundwater Classification

Per 35 I.A.C. § 620.210, groundwater within the uppermost aquifer at the EAP meets the definition of a Class I – Potable Resource Groundwater based on the following criteria:

- Groundwater in the uppermost aquifer extends 10 feet or more below the land surface, and;
- Hydraulic conductivity exceeds the 1×10^{-4} cm/s criterion (**Table 3-3**).

3.3 Surface Water Hydrology

3.3.1 Climate

The climate in Hennepin is humid and annual precipitation generally exceeds evapotranspiration. ISWS records from 1981 through 2010 at the Hennepin water treatment plant in Hennepin, Illinois, which is located approximately four miles southwest of the Site, indicates precipitation averages 36.2 inches per year. Monthly precipitation averages near three inches from April through November, and one to three inches in December through March. On average 15.5 inches of precipitation occur yearly as snowfall.

As shown below in **Table B**, ISWS temperature records show average maximum daily temperatures for 1981 to 2010 ranging from above 70 degrees Fahrenheit (°F) May through September and minimum average daily temperatures that are less than freezing November through March (ISWS, 2021).

Table B. Average Monthly Temperature Extremes and Precipitation for Hennepin Water Treatment Plant, Hennepin, Illinois (1981-2010).

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Max Temp °F	32.4	37.0	49.5	63.0	73.7	83.0	86.4	84.6	78.4	65.6	50.6	36.4	61.8
Min Temp °F	13.7	17.8	28.0	38.5	49.1	58.8	62.7	60.9	51.9	40.3	30.2	18.1	39.3
Precipitation (inches)	1.74	1.71	2.55	3.02	3.93	3.87	4.02	4.18	3.36	2.97	3.04	1.79	36.2

<https://www.isws.illinois.edu/statecli/newnormals/normals.USC00114013.txt>

3.3.2 Surface Waters

The predominant surface water body in the region is the Illinois River and associated lowland backwater lakes. The Illinois River is located directly adjacent to and downgradient from the EAP. A USGS stream gage (No. 05558300) for the Illinois River at Henry, Illinois is located 15 river miles south (downstream) of the HPP. The gage datum elevation is 425.88 feet NGVD29. Daily gage heights for the periods of January 1, 2016 to August 31, 2021 are shown in the following graph (USGS, 2021).

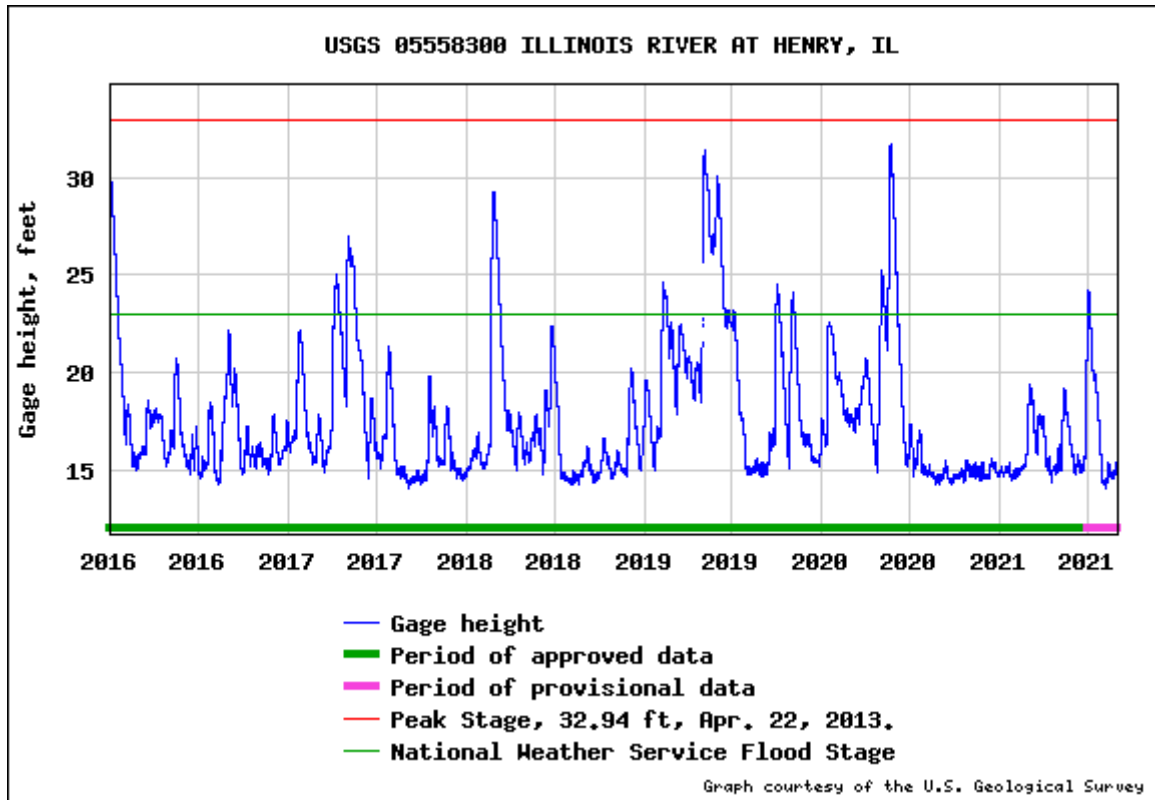


Figure B. Daily Gage Height (feet) January 1, 2016 to August 31, 2021 for USGS Gaging Station 05558300 at the Illinois River near Henry, Illinois.

The gage height of 15 feet, representing approximate base flow, occurs at elevation of about 441 feet NGVD29.

Other surface waters in the vicinity include various ponds on property to the east created by sand and gravel extraction as well as the EAP, Leachate Pond, and Polishing Pond associated with the HPP. A map of wetlands and surface waters in the vicinity of the EAP is presented in **Appendix E**. A Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map for Putnam County (Map No. 17155C0015E; Effective Date: February 4, 2011) is attached in **Appendix F** and can also be viewed online at: <https://www.illinoisfloodmaps.org/dfirm.aspx?county=putnam>.

None of the impoundment berms within the EAPS occur below the base flood elevation value of 462 feet identified on the 2011 FEMA map. The flood hazard areas shown on the map are defined as those areas subject to inundation by the 1 percent annual chance flood (*i.e.*, 100-year flood),

also known as the base flood, that has a 1 percent chance of being equaled or exceeded in any given year.

4. GROUNDWATER QUALITY

4.1 Summary of Groundwater Monitoring Activities

Several monitoring programs are being conducted as required by IEPA and USEPA to evaluate the CCR Units associated with the HPP EAPS and CCWL. The networks have changed over time and many of the wells and parameters overlap as a result of previously approved GMPs and permits which were developed to focus on specific (and separate) Units at the EAPS. The monitoring networks for each of the CCR and non-CCR Units at the EAPS include:

- CCWL
 - IFR (Section 28)
 - 40 C.F.R. § 257
- AP2 and AP4
 - 40 C.F.R. § 257 for AP2 (AP4 was classified as capped or otherwise maintained and not subject to 40 C.F.R § 257)
 - IEPA Closure Plan (2019 GMP included in Closure Plan) and proposed network for Part 845
- EAPS (also includes Leachate Pond and Polishing Pond)
 - IEPA Water Pollution Control Permit 2019-EO-64097 – Special Condition No. 4
- EAP (subject of this HCR)
 - 40 C.F.R. § 257
 - Proposed network for Part 845

Initial monitoring at the HPP, began with the installation of monitoring wells around AP2 in 1983. Since then, additional monitoring wells have been added and modifications to the existing well networks were completed as additional units were proposed and constructed (*i.e.*, 1995/1996 with the construction of the EAP and 2008-2010 for construction of the CCWL). The current monitoring networks are summarized above.

In 2015, additional well installation and groundwater sampling was performed to meet the requirements of 40 C.F.R. § 257. Groundwater samples were collected, and totals analyses were completed for Appendix III and Appendix IV parameters of 40 C.F.R. § 257. In 2021, additional wells were installed to comply with 35 I.A.C. § 845 requirements, specifically to reduce the lateral spacing between monitoring points and to characterize the bedrock confining unit. These wells were sampled for the parameters listed in 35 I.A.C. § 845.600. A review and summary of data from both the 40 C.F.R. § 257 and 35 I.A.C. § 845 monitoring programs is included in the evaluation of groundwater quality at the EAP.

4.1.1 40 C.F.R. § 257 Program Monitoring and Well Network

The 40 C.F.R. § 257 monitoring well network for the EAP consists of seven monitoring wells installed nearby and adjacent to the EAP within the unlithified uppermost aquifer. The 40 C.F.R. § 257 well network consists of three background monitoring wells (07, 08, and 08D) and four compliance monitoring wells (12, 13, 46, and 47). Monitoring wells 16 and 17 are being considered as additional background wells to represent groundwater quality impacts from off-site, upgradient sources.

The boring logs, well construction forms, and other related monitoring well forms for the EAP 40 C.F.R. § 257 well network included in **Appendix A** of this HCR.

Assessment monitoring of these wells was established on April 9, 2018. The 40 C.F.R. § 257 well network locations are shown on **Figure 3-1**. Details on the procedures and techniques used to fulfill the groundwater sampling and analysis program requirements are found in the Sampling and Analysis Plan for the EAP (NRT, 2017).

Groundwater samples are collected and analyzed semiannually for the following laboratory parameters from Appendix III and Appendix IV of 40 C.F.R. § 257, summarized in **Table C** below.

Table C. 40 C.F.R. § 257 Groundwater Monitoring Program Parameters

Field Parameters¹			
Groundwater Elevation	pH		
Appendix III Parameters (Total, except TDS)			
Boron	Chloride	Sulfate	
Calcium	Fluoride	TDS	
Appendix IV Parameters (Total)			
Antimony	Cadmium	Lead	Selenium
Arsenic	Chromium	Lithium	Thallium
Barium	Cobalt	Mercury	Radium 226/228
Beryllium	Fluoride	Molybdenum	

¹Dissolved oxygen, temperature, specific conductance, oxidation/reduction potential, and turbidity are recorded during sample collection.

4.1.2 Part 845 Well Installation and Groundwater Monitoring

In 2021, four additional monitoring wells (52, 53, 54, and 55) were installed along the perimeter of the EAP to assess the vertical and horizontal lithology, stratigraphy, chemical properties, and physical properties of geologic layers to a minimum of 100 feet bgs as specified in 35 I.A.C. § 845.620(b). Additionally, three leachate monitoring wells (XPW01, XPW02, and XPW03) were installed within the EAP unit to characterize the CCR materials.

Prospective Part 845 monitoring wells were sampled for eight rounds from February to August 2021 and the results were assessed for selection of the EAP Part 845 monitoring well network presented in the GMP. Groundwater samples were collected and analyzed for 35 I.A.C. § 845.600 parameters summarized in **Table D** below. Part 845 groundwater monitoring results are included below in **Section 4.2** and a summary of groundwater analytical data is presented in **Table 4-1**.

Table D. Part 845 Groundwater Monitoring Program Parameters

Field Parameters¹			
Groundwater Elevation	pH	Turbidity	
Metals (Total)			
Antimony	Boron	Cobalt	Molybdenum
Arsenic	Cadmium	Lead	Selenium
Barium	Calcium	Lithium	Thallium
Beryllium	Chromium	Mercury	
Inorganics (Total, except TDS)			
Fluoride	Sulfate	Chloride	TDS
Other (Total)			
Radium 226 and 228 combined			

¹ Dissolved oxygen, temperature, specific conductivity, and oxidation/reduction potential were recorded during sample collection.

4.2 Groundwater Monitoring Results and Analysis

Groundwater data collected from the 40 C.F.R. § 257 network monitoring wells from 2015 to 2021 were supplemented with sampling of additional locations in 2021 and evaluated with respect to standards included in 35 I.A.C. § 845.600(a)(1). This data set was selected because it includes parameters (total metals) consistent with the parameter list in 35 I.A.C. § 845.600(a)(1). Based on this data set there were no concentrations of antimony, arsenic, barium, beryllium, boron, cadmium, chromium, fluoride, lead, mercury, molybdenum, radium 226 and 228 combined, selenium, or sulfate greater than the GWPSs. Discussion of primary indicator parameters for CCR leachate impacts on groundwater quality (boron, chloride, sulfate, TDS, and pH) as well as recent potential exceedances^[1] (chloride, TDS, pH, cobalt, lithium, and thallium) observed in the proposed Part 845 network (although limited in occurrence) are provided in the following sections. A summary of groundwater analytical data is provided in **Table 4-1** and groundwater field parameters are included in **Table 4-2**.

4.2.1 Boron

Boron is a primary indicator parameter for CCR leachate impacts on groundwater quality. Boron was not detected at concentrations greater than the GWPS (2 milligrams per liter [mg/L]) during monitoring events from 2015 to 2021 (**Table 4-1**). Boron concentrations at background wells (07, 08, 08D, 16, and 17) ranged from 0.054 to 0.181 mg/L with a median concentration of 0.110 mg/L. Boron concentrations at compliance wells (12, 13, 46, 47, 52, 53, 54, and 55) ranged from 0.104 to 1.41 mg/L with a median concentration of 0.388 mg/L. Except for well 13, concentrations of boron detected in background and compliance wells were all less than 1 mg/L.

^[1] Potential exceedances include results reported during the eight rounds of baseline groundwater monitoring that are greater than the applicable 35 I.A.C. § 845.600(a)(1) standards. The results are considered potential exceedances because they were compared directly to the standard and did not include an evaluation of background groundwater quality or apply the statistical methodologies proposed in the Groundwater Monitoring Plan (GMP). For simplicity, "GWPS" will be used hereafter in discussing potential exceedances. Exceedances will be determined following IEPA approval of the GMP.

4.2.2 Chloride

Chloride was detected at concentrations greater than the GWPS (200 mg/L) in background well 08 during 25 monitoring events and at upgradient (background) well 08D during 26 sampling events from 2015 to 2021 (**Table 4-1**). Chloride concentrations at background well 08 ranged from 127 to 312 mg/L with a median concentration of 253 mg/L. Chloride concentrations at background well 08D ranged from 184 to 366 mg/L with a median concentration of 245 mg/L.

4.2.3 Sulfate

Sulfate is also a primary indicator of CCR leachate impacts on groundwater quality. Sulfate was not detected at concentrations greater than the GWPS (400 mg/L) during monitoring events from 2015 to 2021 (**Table 4-1**). Sulfate concentrations at background wells (07, 08, 08D, 16, and 17) ranged from 48 to 278 mg/L with a median concentration of 120 mg/L. Sulfate concentrations at compliance wells (12, 13, 46, 47, 52, 53, 54, and 55) ranged from 22 to 112 mg/L with a median concentration of 69.0 mg/L.

4.2.4 Total Dissolved Solids

TDS was detected at concentrations greater than the GWPS (1,200 mg/L) at background monitoring well 08 during ten monitoring events and at background monitoring well 08D during 15 monitoring events from 2015 to 2021 (**Table 4-1**). TDS concentrations at monitoring well 08 ranged from 918 to 1,520 mg/L with a median concentration of 1,200 mg/L. TDS concentrations at monitoring well 08D ranged from 954 to 1,340 mg/L with a median concentration of 1,230 mg/L.

4.2.5 pH

Recorded field pH measurements were less than the lower limit GWPS for pH (6.5 standard units [SU]) at background well 07 during one monitoring event in November 2019, at background well 08 during one monitoring event in July 2021, and at background well 08D during three monitoring events occurring from May to July 2021 (**Table 4-1**). Recorded field pH measurements at monitoring well 07 ranged from 6.3 to 7.5 SU with a median pH measurement of 6.9 SU. Recorded field pH measurements at monitoring well 08 ranged from 6.4 to 7.2 SU with a median pH measurement of 6.7 SU. Recorded field pH measurements at monitoring well 08D ranged from 6.32 to 7.1 SU with a median pH measurement of 6.7 SU. No pH measurements were greater than the upper limit GWPS of 9.0 SU.

4.2.6 Cobalt

Cobalt was detected at concentrations greater than the GWPS (0.006 mg/L) at background wells 07, 08, and 08D, and at compliance wells 53 and 55, multiple times during monitoring events from 2015 to 2021 (**Table 4-1**). Cobalt concentrations at background wells (07, 08, 08D, 16, and 17) ranged from non-detect (at a reporting limit of 0.001 mg/L) to 0.147 mg/L with a median concentration of 0.003 mg/L. Cobalt concentrations at compliance wells (12, 13, 46, 47, 52, 53, 54, and 55) ranged from non-detect (at a reporting limit of 0.001 mg/L) to 0.011 mg/L with a median concentration of 0.001 mg/L. Cobalt concentrations in compliance well 55, which is screened in the bedrock confining unit, ranged from non-detect (at a reporting limit of 0.001 mg/L) to 0.007 mg/L with a median concentration of 0.002 mg/L.

4.2.7 Lithium

Lithium was detected at concentrations greater than the GWPS (0.04 mg/L) at compliance well 55 during one monitoring event occurring in April 2021 (**Table 4-1**). Lithium concentrations at compliance well 55, which is screened in the bedrock confining unit, ranged from 0.026 to 0.041 mg/L with a median concentration of 0.031 mg/L.

4.2.8 Thallium

Thallium was detected at concentrations greater than the GWPS (0.002 mg/L) at background well 08 and compliance well 52 during one monitoring event occurring in August 2021. Thallium concentrations at background well 08 ranged from non-detect (at a reporting limit of 0.001 mg/L) to 0.003 mg/L with a median concentration of 0.002 mg/L. Thallium concentrations at compliance well 52 ranged from non-detect (at a reporting limit of 0.001 mg/L) to 0.0025 mg/L with a median concentration of 0.002 mg/L.

5. EVALUATION OF POTENTIAL RECEPTORS

5.1 Water Well Survey

A potable water well inventory was completed in 2021 utilizing federal and state databases to assess nearby pumping wells, drinking water receptors, and other uses of water in the vicinity of the EAP. The following sources of information were queried to identify well locations, drinking water receptors, and other uses of water within 1,000 meters of the EAP boundary:

- USGS National Groundwater Monitoring Network (NGWMN)^[1]
- ISGS Illinois Water and Related Wells (ILWATER) Map^[2]
- USEPA Safe Drinking Water Information System (SDWIS)^[3]
- IEPA Illinois Drinking Water Watch (DWW)^[4]

As indicated in the USGS NGWMN, the EAP is situated above one or more water bearing units (**Appendix E**) of alluvial and glacial origins. However, the aquifer is not designated as a principal aquifer, which is defined as a regionally extensive aquifer or aquifer system that has the potential to be used as a source of potable water.

A review of the USEPA SDWIS and IEPA DWW databases for drinking water intakes in the vicinity of the EAP yielded no results for public water systems (PWSs) within 1,000 meters of the Site. The PWSs in Putnam County and Bureau County (north of the Site) obtain drinking water from groundwater. Based on approximated locations obtained from SWDIS, the PWS wells are not within 1,000 meters of the EAP.

A comprehensive search of the ILWATER Map identified ten wells, including three co-located wells) within 1,000 meters of the EAP (**Appendix E**). Under normal conditions, three of these wells are located downgradient (Well IDs 121552059800, 121552043500, and 121550012800) from the EAP, two are located side gradient (Well IDs 121552045800 and 121552059900), and the remaining five are located upgradient (Well IDs 121552029200, 121552049700, 121552025800, 121552051800, and 121552068500). The three downgradient wells (Well IDs 121552059800, 121552043500, and 121550012800) and one of the side gradient wells (Well ID 121552059900) are attributed to Illinois Power, now HPP (**Appendix E**).

5.2 Surface Water

A comprehensive search was performed utilizing the United States Fish and Wildlife Service (USFWS) Wetlands Mapper⁵ and the USGS National Map⁶ for surface water bodies within 1,000 meters of the EAP. The predominant surface water bodies near the EAP are the Illinois River, located to the north of the Site, and Lyons Lake, located to the northeast of the Site. Bordering the north perimeter of the EAPS, the river has a normal pool elevation of about 441 feet. A USGS stream gage (No. 05558300) for the Illinois River at Henry, Illinois is located 15 river miles south (downstream) of the HPP. The gage datum elevation is 425.88 feet NGVD29. Daily gage heights

[1] USGS NGWMN: <https://cida.usgs.gov/ngwmn/index.jsp>

[2] ISGS ILWATER Map:

<https://prairieresearch.maps.arcgis.com/apps/webappviewer/index.html?id=e06b64ae0c814ef3a4e43a191cb57f87>

[3] USEPA SDWIS: <https://www.epa.gov/enviro/sdwis-search>

[4] IEPA Illinois DWW: <http://water.epa.state.il.us/dww/index.jsp>

[5] USFWS Wetlands Mapper: <https://www.fws.gov/wetlands/data/mapper.html>

[6] USGS National Map: <https://apps.nationalmap.gov/viewer/>

for the periods of January 1, 2016 to August 31, 2021 are shown on the **Figure B** in **Section 3.3.2**. The gage height of 15 feet, representing approximate base flow, occurs at elevation of about 441 NGVD29.

Additional surface water features indicated in the USFWS Wetlands Mapper and USGS National Map include several freshwater emergent wetlands and freshwater forested/shrub wetlands located to the north, northeast and southwest of the EAP and an unnamed stream located to the east of the EAP. A map of wetlands and surface waters in the vicinity of the EAP is presented in **Appendix E**.

The USGS National Map places the EAP within the Depue Lake-Illinois River Watershed (Hydrologic Unit Code [HUC] 071300010804), which is part of the Alforques Creek Illinois River Watershed (HUC 0713000108) and located within the larger Lower Illinois-Senachwine Lake Watershed (HUC 07130001). The HUC watershed location is presented in **Appendix E**.

Based on groundwater elevation contours (**Figure 3-3**), under normal conditions groundwater predominantly flows to the north and northwest, towards the Illinois River. Due to the downgradient location and proximity of the Illinois River to the EAP, the Illinois River is likely to be hydraulically connected to the uppermost aquifer beneath the Hennepin EAP.

5.3 Nature Preserves, Historic Sites, Endangered/Threatened Species

A comprehensive search of the Illinois Department of Natural Resources (IDNR) Natural Heritage Database^[7] for natural areas and protected areas within 1,000 meters of the Site was performed. No natural or protected areas were identified within 1,000 meters of the EAP.

The IDNR Natural Heritage Database Threatened and Endangered Species by County^[8] lists 23 threatened and endangered species as located within Putnam County, including 14 endangered and 9 threatened species. Habitats for endangered or threatened species are identified at the county level only.

Additionally, a search of the IDNR Historic Preservation Division^[9] database for historic sites in the vicinity of the Site yielded no results within 1,000 meters of the EAP.

^[7] IDNR Natural Heritage Database: <https://www2.illinois.gov/dnr/conservation/NaturalHeritage/Pages/NaturalHeritageDatabase.aspx>

^[8] Illinois Threatened and Endangered Species by County: https://www2.illinois.gov/dnr/ESPB/Documents/ET_by_County.pdf

^[9] IDNR Historic Preservation Division: <https://www2.illinois.gov/dnrhistoric/Pages/default.aspx>

6. CONCLUSIONS

Hydrogeologic characterization of the HPP was originally developed as part of the *Hydrogeologic Study, Existing Ash Ponds, Hennepin Power Plant* (Mathes, 1983) and most recently updated for the *Hydrogeologic Site Characterization Report* (NRT/OBG, 2017a). Results of these hydrogeologic studies were reintroduced in this HCR and updated to include geologic, hydrogeologic, and groundwater quality data collected with a focus on the EAP (Part 845 regulated) CCR Unit and subject of this HCR.

The data were summarized and evaluated for changes in groundwater conditions since the previous investigations; available groundwater quality data for the EAP was compared to the GWPSs.

The results of the hydrogeologic and groundwater quality evaluation are:

- There are three principal types of unlithified materials above the bedrock in the vicinity of the EAP, these include the following in descending order: fill – predominantly as bottom ash and fly ash; Cahokia Alluvium (alluvial clay, sandy clay, and clayey sand ranging in thickness at the EAP from 9.5 to 14.5 feet); and the Henry Formation (glacial outwash consisting of sands and gravels ranging in thickness at the EAP from 21 to 45 feet). Depth to bedrock at the Site ranges from 399.2 feet NAVD88 at well 18D to 410.2 feet NAVD88 at well 55.
- Two distinct water bearing layers have been identified at the EAP based on stratigraphic relationships and common hydrogeologic characteristics, these include the following in descending order: the uppermost aquifer (unlithified natural geologic materials of the Cahokia Alluvium and Henry Formation extending from the upper saturated zone to the bedrock, predominantly sand and gravels with some sandy clay and clayey sand with a geometric mean horizontal hydraulic conductivity of 8.4×10^{-2} cm/s); and the bedrock confining unit (composed of shales with thin limestone, sandstone, and coal beds with a horizontal hydraulic conductivity of 3.7×10^{-5} cm/s).
- Groundwater flows from beneath the EAP toward the Illinois River through the uppermost aquifer as the primary pathway for contaminant migration, although temporary flow reversals are observed during periods of high river elevations or flooding. Vertical migration is limited by the underlying Pennsylvanian-age shale bedrock unit which acts as a confining layer. No potential migration pathways have been identified outside of the uppermost aquifer.
- Based on water level elevation measurements, lateral groundwater flow in the shallow unlithified materials is generally from south to north toward the Illinois River. Under high river stage events or flooding, flow direction can be reversed (*i.e.*, groundwater flows in a south to southwest direction) near the river for limited durations. Estimated groundwater velocities in the shallow unlithified materials at the EAP ranged from approximately 0.03 to 10.6 ft/day with an average velocity of 1.7 ft/day. Groundwater flow reversals were observed to the north and west of the EAP most recently in August 2021. Groundwater velocity at the base of the aquifer, as measured in wells 08D and 18D, was on average approximately 0.6 ft/day.
- The flat horizontal groundwater gradient beneath the EAP and the small and inconsistent upward/downward vertical gradients between wells 13 and 55 suggests the EAP and neighboring ponds are not areas of increased recharge or infiltration.
- Groundwater within the uppermost aquifer at the EAP is classified as Class I – Potable Resource Groundwater.
- Potential exceedances of 35 I.A.C. § 845.600 GWPSs were detected in monitoring wells at the EAP are summarized as follows:
 - Chloride – at background uppermost aquifer wells 08 and 08D;

- Cobalt – at background uppermost aquifer wells 07, 08, and 08D; at uppermost aquifer compliance well 53; and at bedrock confining unit compliance well 55;
- Lithium – at bedrock confining unit compliance well 55 in April 2021;
- pH – at background uppermost aquifer wells 07, 08, and 08D;
- Thallium – at background uppermost aquifer well 08; and at compliance uppermost aquifer well 52; and
- TDS – at background uppermost aquifer wells 08 and 08D.

Groundwater results are considered potential exceedances because they were compared directly to the 35 I.A.C. § 845.600 GWPSs and did not include an evaluation of background groundwater quality or apply the statistical methodologies proposed in the GMP.

This HCR satisfies Part 845 content requirements specific to 35 I.A.C. § 845.620(b) (Hydrogeologic Site Characterization) for the EAP at the HPP.

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TABLES

TABLE 2-1. GEOTECHNICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample ID	Field Location ID	Top of Sample (ft bgs)	Bottom of Sample (ft bgs)	Moisture Content (%)	Dry Density (pcf)	Specific Gravity	Calculated Porosity ¹ (%)	Vertical Hydraulic Conductivity (cm/s)	LL	PL	PI	Laboratory USCS	Gravel (%)	Sand (%)	Fines (%)
Cahokia Alluvium															
MW52-(4-8)-20210211	52	4	8	21.4	95.0	2.675	43.1	7.1E-08	32	17	15	CL	0.7	21.0	78.3
MW53-(2-6)-20210112	53	2	6	13.7	120.0	2.680	28.2	2.4E-08	29	16	13	CL	9.6	39.3	51.1
MW55-(15-17.5)-20210210	55	15	17.5	14.4	109.0	2.720	35.8	1.5E-07	32	19	13	SC	12.4	39.6	48.0
Henry Formation															
MW53-(54-58)-20210112	53	54	58	9.9	--	--	--	--	--	--	--	--	48.9	42.8	8.3
MW55-(50-52)-20210210	55	50	52	8.2	--	2.823	--	--	21	15	6	GC-GM	60.0	23.2	16.8
CCR															
XPW01-(10-12)-20210114	XPW01	10	12	157.0	--	2.635	--	--	--	--	--	--	4.0	22.2	73.8
XPW01-(12-14)-20210114	XPW01	12	14	42.3	71.0	2.859	60.2	--	--	--	--	--	14.1	71.8	14.1
XPW01-(15-17)-20210114	XPW01	15	17	31.0	79.0	2.622	51.7	--	--	--	--	--	10.1	83.1	6.8
XPW02-(14-16)-20210115	XPW02	14	16	123.3	36.0	2.615	77.9	2.9E-04	NP	NP	NP	ML	0.0	20.8	79.2
XPW02-(16-18)-20210115	XPW02	16	18	113.2	--	2.622	--	--	NP	NP	NP	ML	0.5	22.1	77.4
XPW03-(14-16)-20210114	XPW03	14	16	177.0	28.0	2.595	82.7	1.7E-04	NP	NP	NP	ML	0.0	13.7	86.3
XPW03-(18-20)-20210114	XPW03	18	20	138.8	34.0	2.585	78.9	2.0E-04	NP	NP	NP	ML	0.0	18.6	81.4

[O: CJC 07/02/21; U: CJC 09/08/21; C: KLT 9/9/21]

Notes:

- ¹ Porosity calculated as relationship of bulk density (ρ_b) to particle density (ρ_d) ($n = 100[1 - (\rho_b/\rho_d)]$)
- bgs = below ground surface
- CCR = coal combustion residuals
- cm/s = centimeters per second
- ft = foot/feet
- LL = Liquid Limit
- NP = Non-Plastic
- pcf = pounds per cubic foot
- PI = Plasticity Index
- PL = Plastic Limit
- = data not available
- % = percent

USCS = Unified Soil Classification System

- CL = Lean Clay
- GC-GM = Clayey to Silty Gravel
- ML = Silt
- SC = Clayey Sand

TABLE 2-2. ASH ANALYTICAL RESULTS
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	Sample Depth (ft BGS)	Sample Date	Antimony (mg/kg)	Arsenic (mg/kg)	Barium (mg/kg)	Beryllium (mg/kg)	Boron (mg/kg)	Cadmium (mg/kg)	Calcium (mg/kg)	Chromium (mg/kg)	Cobalt (mg/kg)	Lead (mg/kg)	Lithium (mg/kg)	Mercury (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Thallium (mg/kg)
XPW01	8-10	01/14/2021	0.96	7.53	4150	2.12	299	0.68	100000	32.7	15.4	22.5	21.6	0.129	2.86	1.17	<0.2
XPW01	14-15	01/14/2021	<0.38	2.7	2580	1.85	117	0.25	71000	20.3	9.19	4.76	23.5	<0.015	2.08	<0.96	<0.19
XPW02	6-8	01/15/2021	<0.75	20.9	4120	2.68	600	1.28	97600	49.6	18.7	32.5	26.9	2.92	9.87	11	1.43
XPW02	16-18	01/15/2021	0.52	6.19	4660	2.31	398	0.68	124000	41	19.2	22.2	22.1	0.274	3.94	1.66	0.41
XPW03	4-6	01/14/2021	1.28	15.6	4200	2.38	379	0.85	105000	46.8	18.6	25	25	0.363	6.1	4.45	0.59
XPW03	16-18	01/14/2021	1.46	9.08	4140	2.2	341	0.69	102000	43.6	18.5	22.7	22.2	0.094	4.43	1.45	0.48

Notes:
 < = concentration is less than the concentration shown, which corresponds to the reporting limit for the method.
 BGS = below ground surface
 ft = feet
 mg/kg = milligrams per kilogram

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TABLE 2-3. POREWATER ANALYTICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Boron, total (mg/L)	Cadmium, total (mg/L)	Calcium, total (mg/L)	Chloride, 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)	pH (field) (SU)	Radium 226 and 228 combined (pCi/L)	Selenium, total (mg/L)	Sulfate, total (mg/L)	Thallium, total (mg/L)
XPW01	02/26/2021	<0.001	0.0067	0.148	<0.001	2.56	<0.001	15.3	80	0.0025	<0.001	0.51	<0.001	0.0208	<0.0002	0.0517	11.9	0.794	0.0033	128	<0.002
XPW01	03/22/2021	<0.001	0.0069	0.142	<0.001	2.3	<0.001	18.6	91	0.0021	<0.001	0.45	<0.001	0.0319	<0.0002	0.0506	11.3	1.09	0.0034	127	<0.002
XPW01	04/08/2021	<0.001	0.0057	0.128	<0.001	2.68	<0.001	30.9	93	<0.0015	<0.001	0.38	<0.001	0.0662	<0.0002	0.0447	11.2	0.116	0.0043	159	<0.002
XPW01	05/06/2021	<0.002	0.00436	0.132	<0.001	2.15	<0.001	31.1	89	0.001	<0.001	0.42	<0.001	0.0408	<0.0002	0.0399	11.3	0.0443	0.00375	146	<0.001
XPW01	08/03/2021	<0.001	0.0033	0.152	<0.001	2.39	<0.001	49.2	87	<0.0015	<0.001	0.32	<0.001	0.087	<0.0002	0.0614	11.2	1.4	0.0057	189	<0.002
XPW02	02/25/2021	<0.001	0.0193	0.116	<0.001	3.35	<0.001	27.7	99	0.0042	<0.001	1.85	<0.001	0.0153	<0.0002	0.61	12.8	0.528	0.08	632	<0.002
XPW02	03/22/2021	<0.001	0.0063	0.561	<0.001	2.87	<0.001	45.9	56	0.119	0.0037	1.58	0.0051	0.0076	<0.0002	0.483	12.1	0.627	0.143	306	<0.002
XPW02	04/08/2021	<0.001	0.0102	0.132	<0.001	4.21	<0.001	25.4	67	0.0079	<0.001	1.75	<0.001	0.01	<0.0002	0.532	12.2	0.687	0.152	315	<0.002
XPW02	05/06/2021	<0.002	0.0107	0.284	<0.001	3.02	<0.001	34.1	76	0.00464	0.00184	2.19	0.00245	0.00947	0.00026	0.536	11.9	0.251	0.127	318	<0.001
XPW02	08/03/2021	<0.001	0.0038	0.334	<0.001	3.4	<0.001	38.8	54	0.0415	<0.001	1.46	0.0015	0.0057	<0.0002	0.514	12.0	0.881	0.158	331	<0.002
XPW03	02/26/2021	<0.001	0.0023	0.357	<0.001	2.78	<0.001	125	75	<0.0015	<0.001	0.2	<0.001	0.0396	<0.0002	0.0565	12.5	0.256	0.0061	186	<0.002
XPW03	03/22/2021	<0.001	0.0028	0.528	<0.001	2.63	<0.001	107	69	0.0034	0.0013	0.16	0.0016	0.0497	<0.0002	0.0571	11.6	0.519	0.0065	194	<0.002
XPW03	04/07/2021	<0.001	0.0025	0.313	<0.001	3.07	<0.001	97.2	71	<0.0015	<0.001	0.16	<0.001	0.0634	<0.0002	0.0536	11.6	0.105	0.0057	192	<0.002
XPW03	05/05/2021	<0.002	0.00228	0.358	<0.001	2.77	<0.001	119	76	0.00155	<0.001	0.16	<0.001	0.049	<0.0002	0.0571	11.6	0.151	0.00706	219	<0.001
XPW03	08/03/2021	<0.001	0.0017	0.301	<0.001	2.73	<0.001	105	74	<0.0015	<0.001	0.15	<0.001	0.0591	<0.0002	0.057	11.4	1.3	0.0056	241	<0.002

Notes:

Field readings are reported with as many significant figures as provided by analytical laboratory.
< = concentration is less than the concentration shown, which corresponds to the reporting limit for the method.
mg/L = milligrams per liter
pCi/L = picocuries per liter
SU = standard units

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TABLE 2-4. SOIL ANALYTICAL RESULTS
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	Geologic Unit	Sample Depth (ft BGS)	Sample Date	Antimony (mg/kg)	Arsenic (mg/kg)	Barium (mg/kg)	Beryllium (mg/kg)	Boron (mg/kg)	Cadmium (mg/kg)	Calcium (mg/kg)	Chromium (mg/kg)	Cobalt (mg/kg)	Lead (mg/kg)	Lithium (mg/kg)	Mercury (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Thallium (mg/kg)
52	Cahokia Alluvium	8-12	01/13/2021	0.42	9.49	145	0.67	6.06	1.34	24000	19.7	12.4	19.7	8.81	0.035	1.81	<0.96	0.26
52	Henry Formation	49-50	02/22/2021	0.71	4.59	52.9	0.37	7.2	1.13	247000	9.9	5.06	6.27	6.35	0.013	1.66	<0.94	<0.19
53	Cahokia Alluvium	8-10	01/12/2021	0.39	10	293	1.11	5.51	0.83	6230	26.7	14.1	19.9	12.4	0.02	1.27	<0.91	0.29
53	Henry Formation	50-54	01/12/2021	1.12	21	53.1	0.87	12.9	1.33	277000	10.5	14.5	14.4	7.92	0.026	8.23	<0.96	0.53
54	Cahokia Alluvium	10-12	02/09/2021	0.63	11.9	153	0.66	17.9	1.15	55800	18.4	10.1	16.6	9.82	0.025	1.86	<0.93	<4.63
54	Henry Formation	53.5-54.5	02/09/2021	0.87	10.9	92.8	0.56	17.6	1.65	126000	18.9	9.7	19.5	8.86	0.02	5.27	<0.94	<4.72
55	Cahokia Alluvium	8-10	02/09/2021	0.44	8.74	150	0.58	18	0.57	19900	17	10.2	15	8.95	0.024	1.35	<0.94	<4.72
55	Henry Formation	55-56	02/10/2021	<0.38	5.02	98.1	0.35	8.96	1.33	254000	9.74	5.8	9.27	6.68	<0.01	3.44	<0.93	<4.63
55	Bedrock	85-89	02/10/2021	1.77	8.48	36.3	0.82	3.93	0.75	70400	21.5	20.5	17.9	29.9	0.018	1.59	<3.92	<4.9

Notes:
 < = concentration is less than the concentration shown, which corresponds to the reporting limit for the method.
 BGS = below ground surface
 ft = foot or feet
 mg/kg = milligrams per kilogram

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TABLE 3-1. MONITORING WELL LOCATIONS AND CONSTRUCTION DETAILS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Well Number	HSU	Date Constructed	Top of PVC Elevation (ft)	Measuring Point Elevation (ft)	Measuring Point Description	Ground Elevation (ft)	Screen Top Depth (ft BGS)	Screen Bottom Depth (ft BGS)	Screen Top Elevation (ft)	Screen Bottom Elevation (ft)	Well Depth (ft BGS)	Bottom of Boring Elevation (ft)	Screen Length (ft)	Screen Diameter (inches)	Latitude (Decimal Degrees)	Longitude (Decimal Degrees)
02	UA	11/29/1982	492.01	492.01	Top of PVC	488.50	45.00	55.00	443.54	433.54	57.00	431.50	10	2	41.301321	-89.309151
03R	UA	01/16/2015	481.92	481.92	Top of PVC	479.40	42.00	52.00	437.38	427.38	52.00	427.40	10	2	41.304578	-89.308691
04R	UA	01/13/2015	486.60	486.60	Top of PVC	484.13	41.00	51.00	443.13	433.13	51.00	433.10	10	2	41.305564	-89.301177
05R	UA	01/14/2015	488.43	488.43	Top of PVC	485.60	44.00	54.00	441.60	431.60	54.00	431.60	10	2	41.305163	-89.305449
05DR	UA	01/14/2015	488.37	488.37	Top of PVC	485.70	70.00	75.00	415.70	410.70	75.00	410.70	5	2	41.30516	-89.305471
06	UA	12/08/1982	469.75	469.75	Top of PVC	467.60	28.70	38.70	438.86	428.86	40.00	427.60	10	2	41.304178	-89.310285
07	UA	11/15/1984	518.27	518.27	Top of PVC	515.10	67.50	77.50	447.61	437.61	78.00	437.10	10	2	41.297986	-89.305712
08	UA	11/17/1984	501.38	501.38	Top of PVC	498.70	51.50	61.50	447.24	437.24	62.00	436.70	10	2	41.300698	-89.3044
08D	UA	04/17/2009	501.34	501.34	Top of PVC	498.80	83.00	88.00	415.79	410.79	90.00	408.80	5	2	41.300799	-89.304522
10	UA	03/28/1995	498.03	498.03	Top of PVC	495.19	48.80	58.80	446.39	436.39	57.00	438.20	10	2	41.302824	-89.307656
11	UA	03/27/1995	498.25	498.25	Top of PVC	495.35	65.30	67.30	430.05	428.05	68.00	427.30	2	2	41.30282	-89.307668
12	UA	03/28/1995	498.44	498.44	Top of PVC	495.16	49.45	59.50	445.71	435.71	60.00	435.20	10	2	41.303663	-89.304304
13	UA	03/01/1995	498.47	498.47	Top of PVC	495.38	67.00	69.00	428.38	426.38	75.00	420.40	2	2	41.303658	-89.304315
15	UA	03/29/1995	496.80	496.80	Top of PVC	494.23	50.65	60.70	443.58	433.58	60.00	434.20	10	2	41.304388	-89.301997
16	UA	03/30/1995	501.74	501.74	Top of PVC	500.30	56.00	66.00	444.28	434.28	68.00	432.30	10	2	41.30168	-89.302861
17	UA	03/30/1995	507.13	507.13	Top of PVC	504.80	58.06	68.10	446.77	436.77	68.00	436.80	10	2	41.3022	-89.3006
18S	UA	04/14/2009	487.70	487.70	Top of PVC	485.59	40.00	50.00	445.59	435.59	52.00	433.60	10	2	41.304939	-89.3071
18D	UA	04/14/2009	487.60	487.60	Top of PVC	485.51	71.00	76.00	414.51	409.51	78.00	407.50	5	2	41.30492	-89.307093
19S	UA	04/16/2009	487.26	487.26	Top of PVC	484.12	40.00	50.00	444.12	434.12	52.00	432.10	10	2	41.30546	-89.303203
19D	UA	04/15/2009	487.19	487.19	Top of PVC	484.09	67.00	72.00	417.09	412.09	74.00	410.10	5	2	41.30546	-89.303196
40S	UA	10/26/2010	487.67	487.67	Top of PVC	484.76	40.00	50.00	444.76	434.76	50.50	434.30	10	2	41.305292	-89.304363
45S	UA	06/29/2015	467.48	467.48	Top of PVC	465.70	35.00	45.00	430.70	420.70	45.00	420.70	10	2	41.303751	-89.310195
46	UA	08/11/2015	498.75	498.75	Top of PVC	496.44	50.00	60.00	446.44	436.44	60.00	436.40	10	2	41.303953	-89.303472

TABLE 3-1. MONITORING WELL LOCATIONS AND CONSTRUCTION DETAILS
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Well Number	HSU	Date Constructed	Top of PVC Elevation (ft)	Measuring Point Elevation (ft)	Measuring Point Description	Ground Elevation (ft)	Screen Top Depth (ft BGS)	Screen Bottom Depth (ft BGS)	Screen Top Elevation (ft)	Screen Bottom Elevation (ft)	Well Depth (ft BGS)	Bottom of Boring Elevation (ft)	Screen Length (ft)	Screen Diameter (inches)	Latitude (Decimal Degrees)	Longitude (Decimal Degrees)
47	UA	08/11/2015	502.65	502.65	Top of PVC	499.07	50.00	60.00	452.13	442.13	60.00	442.10	10	2	41.303301	-89.305994
48	UA	08/11/2015	487.46	487.46	Top of PVC	485.19	44.00	54.00	441.19	431.19	54.00	431.20	10	2	41.305227	-89.304931
52	UA	02/11/2021	500.93	500.93	Top of PVC	497.70	51.00	61.00	446.74	436.74	60.90	436.80	10	2	41.302466	-89.306369
53	UA	01/13/2021	502.68	502.68	Top of PVC	500.00	53.80	63.80	446.21	436.21	64.11	435.90	10	2	41.301693	-89.305583
54	UA	02/09/2021	500.30	500.30	Top of PVC	497.10	65.00	75.00	432.14	422.14	74.06	423.10	10	2	41.303439	-89.30522
55	BR	02/10/2021	498.46	498.46	Top of PVC	495.70	90.00	95.00	405.65	400.65	94.69	401.00	5	2	41.303659	-89.304353
XPW01	CCR	01/13/2021	500.97	500.97	Top of PVC	498.19	12.30	17.30	485.89	480.89	17.30	480.90	5	2	41.302603	-89.305842
XPW02	CCR	01/14/2021	504.56	504.56	Top of PVC	501.60	13.60	18.60	488.00	483.00	18.63	483.00	5	2	41.301877	-89.303723
XPW03	CCR	02/08/2021	495.17	495.17	Top of PVC	492.00	14.40	19.40	477.60	472.60	19.29	472.70	5	2	41.303278	-89.30379
XSG01	CCR	--	--	493.49	Staff gauge	--	--	--	--	--	--	--	--	--	41.302583	-89.302249
SG02	SW	--	--	--	Staff gauge	--	--	--	--	--	--	--	--	--	41.303678	-89.31531

Notes:

All elevation data are presented relative to the North American Vertical Datum 1988 (NAVD88), GEOID 12A
 -- = data not available
 BGS = below ground surface
 BR = bedrock
 CCR = Coal Combustion Residual
 ft = foot or feet
 HSU = Hydrostratigraphic Unit
 PVC = polyvinyl chloride
 SW = surface water
 UA = uppermost aquifer

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TABLE 3-2. VERTICAL HYDRAULIC GRADIENTS
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Date	08 Groundwater Elevation (ft NAVD88)	08D Groundwater Elevation (ft NAVD88)	Head Change (ft)	Distance Change ¹ (ft)	Vertical Hydraulic Gradient ² (dh/dl)		
	UA	UA					
2/24/2021	446.41	446.21	0.20	33.12	0.0060	down	
3/18/2021	447.50	447.34	0.16	28.95	0.0055	down	
4/7/2021	447.77	447.56	0.21	28.95	0.0073	down	
5/6/2021	449.09	449.06	0.03	28.95	0.0010	flat	
6/8/2021	448.98	448.75	0.23	28.95	0.0079	down	
6/24/2021	449.26	449.31	-0.05	28.95	-0.0017	up	
7/13/2021	451.48	451.44	0.04	28.95	0.0014	flat	
8/3/2021	449.67	449.42	0.25	28.95	0.0086	down	
					Middle of screen elevation 08		442.24
					Middle of screen elevation 08D		413.29

Date	12 Groundwater Elevation (ft NAVD88)	13 Groundwater Elevation (ft NAVD88)	Head Change (ft)	Distance Change ¹ (ft)	Vertical Hydraulic Gradient ² (dh/dl)		
	UA	UA					
2/24/2021	--	446.28	--	13.33	--	--	
3/22/2021	447.38	447.47	-0.09	13.33	-0.0068	up	
4/7/2021	447.60	447.61	-0.01	13.33	-0.0008	flat	
5/5/2021	448.78	448.77	0.01	13.33	0.0008	flat	
6/8/2021	448.68	448.69	-0.01	13.33	-0.0008	flat	
6/23/2021	449.15	449.18	-0.03	13.33	-0.0023	up	
7/13/2021	451.34	451.35	-0.01	13.33	-0.0008	flat	
8/3/2021	449.35	449.33	0.02	13.33	0.0015	down	
					Middle of screen elevation 12		440.71
					Middle of screen elevation 13		427.38

TABLE 3-2. VERTICAL HYDRAULIC GRADIENTS
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Date	12 Groundwater Elevation (ft NAVD88)	55 Groundwater Elevation (ft NAVD88)	Head Change (ft)	Distance Change ¹ (ft)	Vertical Hydraulic Gradient ² (dh/dl)		
	UA	UA					
2/24/2021	--	446.52	--	37.56	--	--	
3/22/2021	447.38	447.41	-0.03	37.56	-0.0008	flat	
4/7/2021	447.60	447.61	-0.01	37.56	-0.0003	flat	
5/5/2021	448.78	446.92	1.86	37.56	0.0495	down	
6/8/2021	448.68	448.87	-0.19	37.56	-0.0051	up	
6/23/2021	449.15	448.91	0.24	37.56	0.0064	down	
7/13/2021	451.34	450.56	0.78	37.56	0.0208	down	
8/3/2021	449.35	449.87	-0.52	37.56	-0.0138	up	
					Middle of screen elevation 12		440.71
					Middle of screen elevation 55		403.15

Date	13 Groundwater Elevation (ft NAVD88)	55 Groundwater Elevation (ft NAVD88)	Head Change (ft)	Distance Change ¹ (ft)	Vertical Hydraulic Gradient ² (dh/dl)		
	UA	UA					
2/24/2021	446.28	446.52	-0.24	24.23	-0.0099	up	
3/22/2021	447.47	447.41	0.06	24.23	0.0025	down	
4/7/2021	447.61	447.61	0.00	24.23	0.0000	flat	
5/5/2021	448.77	446.92	1.85	24.23	0.0764	down	
6/8/2021	448.69	448.87	-0.18	24.23	-0.0074	up	
6/23/2021	449.18	448.91	0.27	24.23	0.0111	down	
7/13/2021	451.35	450.56	0.79	24.23	0.0326	down	
8/3/2021	449.33	449.87	-0.54	24.23	-0.0223	up	
					Middle of screen elevation 13		427.38
					Middle of screen elevation 55		403.15

[O: CJC 07/02/21; U: CJC 09/08/21; C: KLT 9/9/21]

Notes:

¹ Distance change was calculated using the midpoint of the piezometer screen and water table surface. If the water table surface was above the top of the monitoring well screen, then distance change was calculated using the midpoint of both screens.

² Vertical gradients between ±0.0015 are considered flat, and typically have less than 0.02 foot difference in groundwater elevation between wells.

-- = data not available

dh = head change

dl = distance change

ft = foot/feet

NAVD88 = North American Vertical Datum of 1988

UA = uppermost aquifer

TABLE 3-3. FIELD HYDRAULIC CONDUCTIVITIES
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Well ID	Gradient Position	Bottom of Screen Elevation (ft NAVD88)	Screen Length ¹ (ft)	Field Identified Screened Material (USCS)	Slug Type	Analysis Method	Falling Head (Slug In) Hydraulic Conductivity (cm/s)			Rising Head (Slug Out) Hydraulic Conductivity (cm/s)				Average Hydraulic Conductivity (cm/s)	Minimum Hydraulic Conductivity (cm/s)	Maximum Hydraulic Conductivity (cm/s)	Hydraulic Conductivity Geometric Mean (cm/s)
							1	2	3	1	2	3	4				
Uppermost Aquifer																	
02 ²	VAR	433.54	10.0	GP, SP	Solid	Bouwer Rice	3.2E+00	--	--	3.1E+00	--	--	--	3.2E+00	1.6E-03	3.2E+00	8.4E-02
07 ²	U	437.61	10.0	SP	Solid	Bouwer Rice	3.5E-02	--	--	4.0E-02	--	--	--	3.8E-02			
08 ²	U	437.24	10.0	GP-GM, GP-GC	Pneumatic/Solid	Bouwer Rice	7.4E-03	--	--	1.0E-02	1.2E-02	1.0E-02	9.2E-03	9.7E-03			
08D ²	U	410.79	5.0	CL, GW-GC, SC	Solid	Bouwer Rice	1.4E-01	--	--	1.7E-01	--	--	--	1.6E-01			
10 ²	VAR	436.39	10.0	GW	--	Estimated	3.7E-01	--	--	--	--	--	--	3.7E-01			
12 ²	D	435.71	10.0	GW	Solid	Bouwer Rice	1.2E-02	--	--	--	--	--	--	1.2E-02			
13 ²	D	426.38	2.0	GW	Solid	Bouwer Rice	2.9E-01	--	--	--	--	--	--	2.9E-01			
15 ²	VAR	433.58	10.0	GW-GM	--	Estimated	3.7E-01	--	--	--	--	--	--	3.7E-01			
16 ²	U	434.28	10.0	GW-GM	Pneumatic/Solid	Bouwer Rice ³	1.5E+00	--	--	6.9E-01	4.7E-01	1.5E+00	--	1.0E+00			
17 ²	U	436.77	10.0	SP	Pneumatic	Bouwer Rice	--	--	--	2.8E-02	2.2E-02	--	--	2.5E-02			
53	VAR	436.21	10.0	GW, SW	Pneumatic	Bouwer-Rice	--	--	--	2.0E-03	1.6E-03	--	--	1.8E-03			
54	D	422.14	10.0	GW-GC	Pneumatic	Springer-Gelhar	--	--	--	3.4E-01	1.8E-01	--	--	2.6E-01			
Bedrock Confining Unit																	
55	D	400.65	5.0	BR	Solid	Bouwer-Rice	--	--	--	3.6E-05	--	--	--	--	--	--	--
CCR																	
XPW01	NA	480.89	5.0	SW	Pneumatic	Bouwer-Rice	--	--	--	5.1E-02	5.2E-02	--	--	5.2E-02	7.7E-03	5.2E-02	1.9E-02
XPW02	NA	483.00	5.0	ML	Pneumatic	Bouwer-Rice	--	--	--	2.1E-02	1.2E-02	--	--	1.7E-02			
XPW03	NA	472.60	5.0	ML	Pneumatic	Bouwer-Rice	--	--	--	8.0E-03	7.7E-03	--	--	7.9E-03			

[O: CJC 07/02/21; U: CJC 09/08/21; C: KLT 9/9/21]

Notes:

- ¹ All wells are constructed from 2 inch polyvinyl chloride (PVC) with 0.01 inch slotted screens.
- ² Hydraulic conductivities were reported in the *Hydrogeologic Site Characterization Report* (Natural Resource Technology, an OBG Company [NRT/OBG], 2017).
- ³ Estimated hydraulic conductivity value reported in NRT/OBG 2017 at well 16 not presented as complete test results are available.
- = data not available
- CCR = coal combustion residuals
- cm/s = centimeters per second
- D = downgradient
- ft = foot/feet
- NAVD88 = North American Vertical Datum of 1988
- U = upgradient
- VAR = variable

USCS = Unified Soil Classification System

- BR = Bedrock
- CL = Lean Clay
- GP-GC = Poorly Graded Gravel with Clay and Sand
- GP-GM = Poorly Graded Gravel with Silt and Sand
- GW = Well Graded Gravel
- GW-GC = Well Graded Gravel with Clay and Sand
- GW-GM = Well Graded Gravel with Silt and Sand
- ML = Silt
- SC = Clayey Sand
- SP = Poorly Graded Sand
- SW = Well Graded Sand

TABLE 3-4. HORIZONTAL HYDRAULIC GRADIENTS AND GROUNDWATER FLOW VELOCITIES
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

$$V = K i / n_e$$

V = Groundwater Velocity ¹
 K = Hydraulic Conductivity ²
 i = hydraulic gradient
 n_e = Effective Porosity ³

West of CCR Unit (53 to 52): Uppermost Aquifer

Distance between Wells (ft): 355
 Hydraulic Conductivity (ft/day): 132
 Effective Porosity (%): 27.4 Assumes: gravel and sand

Date	53 Groundwater Elevation (ft NAVD88)	52 Groundwater Elevation (ft NAVD88)	Change in Elevation (ft)	Horizontal Gradient (ft/ft)	Velocity (ft/day)
2/24/2021-2/25/2021	446.24	446.17	0.07	0.0002	0.1
3/19/2021-3/22/2021	447.08	447.23	-0.15	-0.0004	-0.2
4/7/2021	446.45	447.45	-1.00	-0.0028	-1.4
5/6/2021	448.97	448.95	0.02	0.0001	0.03
6/8/2021	--	448.62	--	--	--
6/23/2021-6/24/2021	449.09	449.23	-0.14	-0.0004	-0.2
7/13/2021	451.27	451.28	-0.01	0.0000	0.0
8/3/2021	449.29	449.37	-0.08	-0.0002	-0.1
			Average	-0.0005	-0.3

East of CCR Unit (17 to 19S): Uppermost Aquifer

Distance between Wells (ft): 1386
 Hydraulic Conductivity (ft/day): 165
 Effective Porosity (%): 20.6 Assumes: gravel, sand, and clay

Date	17 Groundwater Elevation (ft NAVD88)	19S Groundwater Elevation (ft NAVD88)	Change in Elevation (ft)	Horizontal Gradient (ft/ft)	Velocity (ft/day)
2/24/2021	447.95	446.42	1.53	0.0011	0.9
3/18/2021-3/22/2021	448.04	447.16	0.88	0.0006	0.5
4/7/2021	450.39	447.37	3.02	0.0022	1.8
5/5/2021-5/6/2021	453.68	448.44	5.24	0.0038	3.0
6/8/2021	452.59	448.37	4.22	0.0030	2.4
6/23/2021-6/24/2021	453.57	448.55	5.02	0.0036	2.9
7/13/2021	454.14	450.96	3.18	0.0023	1.8
8/3/2021	453.33	449.01	4.32	0.0031	2.5
			Average	0.0025	2.0

TABLE 3-4. HORIZONTAL HYDRAULIC GRADIENTS AND GROUNDWATER FLOW VELOCITIES
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

North of CCR Unit (54 to 18S): Uppermost Aquifer

Distance between Wells (ft): 746
 Hydraulic Conductivity (ft/day): 498
 Effective Porosity (%): 20.4 Assumes: gravel, sand, silt, and clay

Date	54 Groundwater Elevation (ft NAVD88)	18S Groundwater Elevation (ft NAVD88)	Change in Elevation (ft)	Horizontal Gradient (ft/ft)	Velocity (ft/day)
2/24/2021	446.15	446.12	0.03	0.0000	0.1
3/22/2021	447.15	447.27	-0.12	-0.0002	-0.4
4/7/2021	446.40	447.30	-0.90	-0.0012	-2.9
5/5/2021	448.66	448.31	0.35	0.0005	1.1
6/8/2021	448.50	448.26	0.24	0.0003	0.8
6/23/2021-6/25/2021	448.99	448.90	0.09	0.0001	0.3
7/13/2021	--	451.05	--	--	--
8/3/2021	449.18	448.80	0.38	0.0005	1.2
Average				0.0000	0.0

South of CCR Unit (07 to 08): Uppermost Aquifer

Distance between Wells (ft): 1053
 Hydraulic Conductivity (ft/day): 67
 Effective Porosity (%): 24.9 Assumes: gravel, sand, and silt

Date	07 Groundwater Elevation (ft NAVD88)	08 Groundwater Elevation (ft NAVD88)	Change in Elevation (ft)	Horizontal Gradient (ft/ft)	Velocity (ft/day)
2/24/2021	449.54	446.41	3.13	0.0030	0.8
3/18/2021	450.09	447.50	2.59	0.0025	0.7
4/7/2021	450.15	447.77	2.38	0.0023	0.6
5/5/2021-5/6/2021	455.60	449.09	6.51	0.0062	1.7
6/8/2021	451.55	448.98	2.57	0.0024	0.7
6/24/2021	451.49	449.26	2.23	0.0021	0.6
7/13/2021	452.82	451.48	1.34	0.0013	0.3
8/3/2021	452.61	449.67	2.94	0.0028	0.8
Average				0.0028	0.8

TABLE 3-4. HORIZONTAL HYDRAULIC GRADIENTS AND GROUNDWATER FLOW VELOCITIES
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Below CCR Unit (16 to 54): Uppermost Aquifer

Distance between Wells (ft): 910
 Hydraulic Conductivity (ft/day): 1843
 Effective Porosity (%): 20.6 Assumes: gravel, sand, and clay

Date	16 Groundwater Elevation (ft NAVD88)	54 Groundwater Elevation (ft NAVD88)	Change in Elevation (ft)	Horizontal Gradient (ft/ft)	Velocity (ft/day)
2/24/2021	446.18	446.15	0.03	0.0000	0.3
3/18/2021-03/22/2021	447.24	447.15	0.09	0.0001	0.9
4/7/2021	447.48	446.40	1.08	0.0012	10.6
5/5/2021-5/6/2021	449.14	448.66	0.48	0.0005	4.7
6/8/2021	448.76	448.50	0.26	0.0003	2.6
6/23/2021	449.29	448.99	0.30	0.0003	3.0
7/13/2021	452.53	--	--	--	--
8/3/2021	449.47	449.18	0.29	0.0003	2.9
Average				0.0004	3.6

Base of Aquifer (08D to 18D): Uppermost Aquifer

Distance between Wells (ft): 1670
 Hydraulic Conductivity (ft/day): 350
 Effective Porosity (%): 20.6 Assumes: gravel, sand, and clay

Date	08D Groundwater Elevation (ft NAVD88)	18D Groundwater Elevation (ft NAVD88)	Change in Elevation (ft)	Horizontal Gradient (ft/ft)	Velocity (ft/day)
2/24/2021	446.21	446.02	0.19	0.0001	0.2
03/18/2021-03/22/2021	447.34	447.18	0.16	0.0001	0.2
4/7/2021	447.56	447.11	0.45	0.0003	0.5
5/5/2021-5/6/2021	449.06	448.09	0.97	0.0006	1.0
6/8/2021	448.75	447.99	0.76	0.0005	0.8
6/24/2021-6/25/2021	449.31	448.69	0.62	0.0004	0.6
7/13/2021	451.44	450.96	0.48	0.0003	0.5
8/3/2021	449.42	448.43	0.99	0.0006	1.0
Average				0.0003	0.6

[O: CJC 07/02/21; U: CJC 09/08/21; C: KLT 9/10/21]

TABLE 3-4. HORIZONTAL HYDRAULIC GRADIENTS AND GROUNDWATER FLOW VELOCITIES
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Notes:

- ¹ A negative groundwater velocity indicates a reversal of groundwater flow from normal conditions.
- ² Hydraulic conductivity values used above are average of the individual wells used in each velocity calculation as reported in the *Hydrogeologic Monitoring Plan* (Natural Resource Technology, an OBG Company [NRT/OBG], 2017) or derived from slug tests completed in February and March 2021 by Geosyntec Consultants, Inc.
- ³ Effective porosity used in these calculations was derived from an average between estimated values of 0.20 for silt material, 0.267 for gravel, 0.07 for clay, and 0.28 for sand from Morris, D.A. and A.I. Johnson, 1967. *Summary of hydrologic and physical properties of rock and soil materials as analyzed by the Hydrologic Laboratory of the U.S. Geological Survey*, U.S. Geological Survey Water-Supply Paper 1839-D, 42p. and Heath, R.C., 1983. *Basic ground-water hydrology*, U.S. Geological Survey Water-Supply Paper 2220, 86p. Effective porosity may be as high as maximum total porosity (43.1%) calculated in Table 2-1.
- = data not available
% = percent
ft= foot/feet
ft/day = feet per day
ft/ft = feet per foot
NAVD88 = North American Vertical Datum of 1988

TABLE 4-1. GROUNDWATER ANALYTICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Location	Sample Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Boron, total (mg/L)	Cadmium, total (mg/L)	Calcium, total (mg/L)	Chloride, 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)	pH (field) (SU)	Radium 226 and 228 combined (pCi/L)	Selenium, total (mg/L)	Sulfate, total (mg/L)	Thallium, total (mg/L)	Total Dissolved Solids (mg/L)
35 I.A.C. 845.600	Lower	0	0	0	0	0	0	--	0	0	0	0	0	0	0	0	6.5	0	0	0	0	0
	Upper	0.006	0.010	2.0	0.004	2	0.005	--	200	0.1	0.006	4.0	0.0075	0.04	0.002	0.1	9.0	5	0.05	400	0.002	1200
07	03/19/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.1	--	--	--	--	--
07	06/23/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.8	--	--	--	--	--
07	09/17/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.1	--	--	--	--	--
07	12/09/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.0	--	--	--	--	--
07	03/10/2016	<0.001	<0.001	0.104	<0.001	0.0629	<0.001	126	51	<0.001	<0.001	0.1	<0.001	0.0079	<0.0002	<0.001	6.9	0.12	<0.001	70	<0.001	536
07	06/07/2016	<0.001	<0.001	0.13	<0.001	0.0673	<0.001	154	55	<0.001	<0.001	<0.1	<0.001	0.0085	<0.0002	<0.001	6.6	1.09	0.0011	82	<0.001	758
07	06/08/2016	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.6	--	--	--	--	--
07	07/29/2016	<0.001	<0.001	0.111	<0.001	0.0745	<0.001	131	48	<0.001	<0.001	<0.1	<0.001	0.009	<0.0002	<0.001	7.5	1.1	<0.001	71	<0.001	632
07	09/01/2016	<0.001	<0.001	0.13	<0.001	0.0697	<0.001	150	49	<0.001	<0.001	0.1	<0.001	0.0091	<0.0002	<0.001	6.9	0.36	0.0014	75	<0.001	574
07	12/09/2016	<0.001	<0.001	0.168	<0.001	0.0939	<0.001	158	63	0.001	<0.001	0.1	<0.001	0.0084	<0.0002	0.001	6.8	1.21	0.0011	82	<0.001	718
07	02/22/2017	<0.001	<0.001	0.115	<0.001	0.0544	<0.001	137	46	<0.001	<0.001	<0.1	<0.001	0.0084	<0.0002	<0.001	7.0	0.67	<0.001	66	<0.001	660
07	04/27/2017	<0.001	<0.001	0.104	<0.001	0.0588	<0.001	125	48	<0.001	<0.001	<0.1	<0.001	0.0088	<0.0002	<0.001	6.7	0.81	0.001	69	<0.001	630
07	06/08/2017	<0.001	<0.001	0.101	<0.001	0.0701	<0.001	118	56	<0.001	<0.001	0.1	<0.001	0.0081	<0.0002	<0.001	6.9	0.79	0.001	75	<0.001	572
07	09/07/2017	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.9	--	--	--	--	--
07	11/16/2017	--	--	--	--	0.0702	--	136	48	--	--	0.12	--	--	--	--	7.2	--	--	68	--	658
07	03/27/2018	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.8	--	--	--	--	--
07	06/14/2018	<0.001	<0.001	0.106	<0.001	0.0865	<0.001	133	50	<0.0015	<0.001	<0.1	<0.001	0.0086	<0.0002	<0.0015	6.8	0.23	<0.001	67	<0.002	644
07	09/13/2018	--	--	0.136	--	0.0731	<0.001	168	44	<0.0015	<0.001	<0.1	--	0.0113	<0.0002	<0.0015	6.8	0.86	0.001	67	--	684
07	12/13/2018	--	--	--	--	0.079	--	155	39	--	--	<0.1	--	--	--	--	7.0	--	--	60	--	656
07	03/14/2019	<0.001	0.0016	0.109	<0.001	0.0869	<0.001	140	44	<0.0015	<0.001	<0.1	<0.001	0.0094	<0.0002	<0.0015	6.9	0.59	<0.001	59	<0.002	590
07	06/18/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.0	--	--	--	--	--
07	09/18/2019	--	<0.001	0.114	--	0.0797	<0.001	147	33	--	<0.001	0.11	<0.001	0.0088	--	<0.0015	6.3	0.85	<0.001	55	--	666

TABLE 4-1. GROUNDWATER ANALYTICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Location	Sample Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Boron, total (mg/L)	Cadmium, total (mg/L)	Calcium, total (mg/L)	Chloride, 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)	pH (field) (SU)	Radium 226 and 228 combined (pCi/L)	Selenium, total (mg/L)	Sulfate, total (mg/L)	Thallium, total (mg/L)	Total Dissolved Solids (mg/L)
35 I.A.C. 845.600	Lower	0	0	0	0	0	0	--	0	0	0	0	0	0	0	0	6.5	0	0	0	0	0
	Upper	0.006	0.010	2.0	0.004	2	0.005	--	200	0.1	0.006	4.0	0.0075	0.04	0.002	0.1	9.0	5	0.05	400	0.002	1200
07	12/12/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.8	--	--	--	--	--
07	03/12/2020	<0.001	<0.001	0.114	<0.001	0.0788	<0.001	148	60	<0.0015	<0.001	0.11	<0.001	0.0081	<0.0002	<0.0015	6.7	1.36	<0.001	53	<0.002	638
07	06/04/2020	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.9	--	--	--	--	--
07	09/03/2020	<0.001	<0.001	0.117	<0.001	0.0811	<0.001	146	38	<0.0015	<0.001	0.1	<0.001	0.0086	<0.0002	<0.0015	6.8	0.49	<0.001	67	<0.002	606
07	12/10/2020	<0.001	<0.001	0.105	<0.001	0.107	<0.001	142	83	<0.0015	<0.001	<0.1	<0.001	0.0087	<0.0002	<0.0015	6.9	--	<0.001	82	<0.002	612
07	02/24/2021	<0.001	<0.001	0.139	<0.001	0.0837	<0.001	161	57	<0.0015	0.147	0.12	<0.001	0.0105	<0.0002	<0.0015	7.3	0.88	<0.001	105	<0.002	764
07	03/18/2021	<0.001	<0.001	0.133	<0.001	0.0714	<0.001	135	58	<0.0015	0.129	0.11	<0.001	0.0107	<0.0002	<0.0015	6.9	1.21	<0.001	78	<0.002	712
07	04/07/2021	<0.001	<0.001	0.123	<0.001	0.0762	<0.001	102	42	<0.0015	0.0962	0.13	<0.001	0.0096	<0.0002	<0.0015	6.8	0.895	<0.001	72	<0.002	614
07	05/05/2021	<0.002	<0.001	0.131	<0.001	0.0723	<0.001	118	54	<0.001	0.105	0.12	<0.001	0.0103	<0.0002	0.00117	6.7	0.202	<0.001	58	<0.001	--
07	06/08/2021	<0.001	<0.001	0.127	<0.001	0.162	<0.001	121	78	<0.0015	0.0542	0.12	<0.001	0.0097	<0.0002	<0.0015	6.7	1.73	<0.001	53	<0.002	680
07	06/24/2021	<0.001	<0.001	0.109	<0.001	0.0728	<0.001	109	49	<0.0015	0.0479	0.13	<0.001	0.01	<0.0002	<0.0015	6.8	1.72	<0.001	51	<0.002	582
07	07/13/2021	<0.001	<0.001	0.124	<0.001	0.0617	<0.001	124	69	<0.0015	0.0307	0.13	<0.001	0.0087	<0.0002	<0.0015	6.5	1.27	<0.001	55	<0.002	652
07	08/03/2021	<0.001	<0.001	0.11	<0.001	0.069	<0.001	115	48	<0.0015	0.0257	0.13	<0.001	0.0091	<0.0002	<0.0015	6.9	0.661	<0.001	55	<0.002	608
08	03/19/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.9	--	--	--	--	--
08	06/22/2015	--	<0.001	0.136	--	0.141	<0.002	198	269	<0.005	--	<0.1	<0.001	--	<0.0002	<0.01	6.7	--	0.0011	108	--	--
08	09/16/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.8	--	--	--	--	--
08	12/08/2015	<0.001	<0.001	0.118	<0.001	0.0972	<0.001	198	216	<0.001	0.0029	<0.1	<0.001	0.01	<0.0002	0.0015	6.8	0.89	<0.001	164	<0.001	1170
08	03/10/2016	<0.001	<0.001	0.148	<0.001	0.0878	<0.001	213	145	<0.001	0.0017	<0.1	<0.001	0.0091	<0.0002	0.0016	6.7	0.72	<0.001	133	<0.001	918
08	06/07/2016	<0.001	<0.001	0.127	<0.001	0.075	<0.002	191	202	<0.001	0.0034	<0.1	<0.001	0.0092	<0.0002	0.0013	6.6	0.74	<0.001	129	<0.001	1060
08	09/01/2016	<0.001	<0.001	0.146	<0.001	0.142	<0.001	299	312	<0.001	0.0285	<0.1	<0.001	0.0127	<0.0002	0.0014	6.7	0.33	<0.001	209	<0.001	1370
08	12/09/2016	<0.001	<0.001	0.107	<0.001	0.103	<0.001	244	241	<0.001	0.0216	<0.1	<0.001	0.0095	<0.0002	0.0014	6.6	0.63	<0.001	198	<0.001	1200
08	02/22/2017	<0.001	<0.001	0.111	<0.001	0.0873	<0.001	208	223	<0.001	0.0139	<0.1	<0.001	0.0093	<0.0002	0.0014	6.9	0.85	<0.001	140	<0.001	1160

TABLE 4-1. GROUNDWATER ANALYTICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Location	Sample Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Boron, total (mg/L)	Cadmium, total (mg/L)	Calcium, total (mg/L)	Chloride, 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)	pH (field) (SU)	Radium 226 and 228 combined (pCi/L)	Selenium, total (mg/L)	Sulfate, total (mg/L)	Thallium, total (mg/L)	Total Dissolved Solids (mg/L)
35 I.A.C. 845.600	Lower	0	0	0	0	0	0	--	0	0	0	0	0	0	0	0	6.5	0	0	0	0	0
	Upper	0.006	0.010	2.0	0.004	2	0.005	--	200	0.1	0.006	4.0	0.0075	0.04	0.002	0.1	9.0	5	0.05	400	0.002	1200
08	04/27/2017	<0.001	<0.001	0.119	<0.001	0.121	<0.002	182	300	<0.001	0.0158	<0.1	<0.001	0.0118	<0.0002	0.0013	6.7	1.01	<0.001	139	<0.001	1310
08	06/09/2017	<0.001	<0.001	0.0992	<0.001	0.133	<0.001	152	127	<0.001	0.0083	<0.1	<0.001	0.0094	<0.0002	0.0015	6.9	0.85	<0.001	134	<0.001	972
08	09/07/2017	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.7	--	--	--	--	--
08	11/16/2017	--	--	--	--	0.135	--	243	277	--	--	0.1	--	--	--	--	7.0	--	--	167	--	1370
08	03/27/2018	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.7	--	--	--	--	--
08	06/14/2018	<0.001	<0.001	0.119	<0.001	0.168	<0.002	211	290	<0.0015	0.0073	<0.1	<0.001	0.0122	<0.0002	<0.0015	6.7	0.45	<0.001	128	<0.002	1280
08	09/13/2018	--	--	0.135	--	0.114	<0.001	235	241	<0.0015	0.005	<0.1	--	0.0132	<0.0002	<0.0015	6.7	0.14	<0.001	184	--	1200
08	12/13/2018	--	--	--	--	0.151	--	273	288	--	--	0.11	--	--	--	--	6.8	--	--	264	--	1520
08	03/14/2019	<0.001	0.0012	0.105	<0.001	0.172	<0.001	239	272	<0.0015	0.0319	<0.1	<0.001	0.0158	<0.0002	0.0017	6.8	0.66	<0.001	193	<0.002	1370
08	06/18/2019	--	<0.001	0.103	--	0.149	<0.002	225	274	<0.005	--	0.1	<0.001	--	<0.0002	<0.01	6.6	--	<0.001	167	--	--
08	09/18/2019	--	<0.001	0.0943	--	0.151	<0.001	242	220	--	0.0099	<0.1	<0.001	0.0123	--	<0.0015	6.6	1.39	<0.001	195	--	1360
08	12/12/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.6	--	--	--	--	--
08	03/12/2020	<0.001	<0.001	0.0707	<0.001	0.106	<0.001	203	209	<0.0015	0.0131	0.11	<0.001	0.0098	<0.0002	0.0016	6.7	1.13	<0.001	197	<0.002	1210
08	06/04/2020	--	<0.001	0.0795	--	0.13	<0.002	197	265	<0.005	--	0.11	<0.001	--	<0.0002	<0.01	6.7	--	<0.001	158	--	--
08	09/03/2020	<0.001	<0.001	0.0918	<0.001	0.119	<0.001	202	168	<0.0015	0.0047	<0.1	<0.001	0.0116	<0.0002	<0.0015	6.7	0.88	<0.001	154	<0.002	1010
08	12/10/2020	<0.001	<0.001	0.0765	<0.001	0.137	<0.001	228	209	<0.0015	0.0085	<0.1	<0.001	0.0112	<0.0002	<0.0015	6.7	--	<0.001	278	<0.002	1250
08	02/24/2021	<0.001	<0.001	0.0773	<0.001	0.132	<0.001	190	231	<0.0015	0.0034	0.11	<0.001	0.0119	<0.0002	<0.0015	7.2	0.432	<0.001	121	<0.002	1110
08	03/18/2021	<0.001	<0.001	0.0969	<0.001	0.124	<0.001	215	273	<0.0015	0.0045	<0.1	<0.001	0.013	<0.0002	<0.0015	6.7	0.54	<0.001	128	<0.002	1200
08	04/08/2021	<0.001	<0.001	0.104	<0.001	0.133	<0.001	221	284	<0.0015	0.0063	0.1	<0.001	0.0121	<0.0002	<0.0015	6.6	0.0906	<0.001	138	<0.002	1250
08	05/06/2021	<0.002	<0.001	0.0963	<0.001	0.133	<0.001	206	253	<0.001	0.00916	0.11	<0.001	0.0112	<0.0002	0.00143	6.6	0.289	<0.001	137	<0.001	1200
08	06/08/2021	<0.001	<0.001	0.0905	<0.001	0.181	<0.001	209	259	<0.0015	0.0087	0.1	<0.001	0.0125	<0.0002	<0.0015	6.5	0.475	<0.001	134	<0.002	1170
08	06/24/2021	<0.001	<0.001	0.0879	<0.001	0.141	<0.001	204	259	<0.0015	0.0106	0.11	<0.001	0.015	<0.0002	<0.0015	6.6	0.983	<0.001	120	<0.002	1110

TABLE 4-1. GROUNDWATER ANALYTICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Location	Sample Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Boron, total (mg/L)	Cadmium, total (mg/L)	Calcium, total (mg/L)	Chloride, 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)	pH (field) (SU)	Radium 226 and 228 combined (pCi/L)	Selenium, total (mg/L)	Sulfate, total (mg/L)	Thallium, total (mg/L)	Total Dissolved Solids (mg/L)
35 I.A.C. 845.600	Lower	0	0	0	0	0	0	--	0	0	0	0	0	0	0	0	6.5	0	0	0	0	0
	Upper	0.006	0.010	2.0	0.004	2	0.005	--	200	0.1	0.006	4.0	0.0075	0.04	0.002	0.1	9.0	5	0.05	400	0.002	1200
08	07/13/2021	<0.001	<0.001	0.0909	<0.001	0.126	<0.001	208	253	<0.0015	0.0104	0.11	<0.001	0.013	<0.0002	<0.0015	6.4	0.192	<0.001	131	<0.002	1130
08	08/03/2021	<0.001	<0.001	0.0856	<0.001	0.129	<0.001	195	230	<0.0015	0.0072	<0.1	<0.001	0.0138	<0.0002	0.0015	6.6	0.179	<0.001	114	0.0034	1050
08D	03/19/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.9	--	--	--	--	--
08D	06/22/2015	--	<0.001	0.144	--	0.13	<0.002	198	236	<0.005	--	0.11	<0.001	--	<0.0002	<0.01	6.7	--	<0.001	142	--	--
08D	09/16/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.8	--	--	--	--	--
08D	12/08/2015	<0.001	<0.001	0.133	<0.001	0.109	<0.001	174	184	<0.001	0.0122	0.12	<0.001	0.0121	<0.0002	0.0014	6.9	0.94	<0.001	119	<0.001	1050
08D	03/10/2016	<0.001	<0.001	0.155	<0.001	0.122	<0.001	187	209	<0.001	0.0036	0.1	<0.001	0.0143	<0.0002	0.0013	6.7	0.12	<0.001	130	<0.001	1060
08D	06/07/2016	<0.001	<0.001	0.138	<0.001	0.111	<0.002	177	217	<0.001	0.0028	0.1	<0.001	0.0108	<0.0002	0.0011	6.6	0.35	<0.001	113	<0.001	1090
08D	09/01/2016	<0.001	<0.001	0.23	<0.001	0.139	0.0011	287	325	<0.001	0.013	0.12	<0.001	0.0164	<0.0002	0.0014	6.6	0.55	<0.001	161	<0.001	1340
08D	12/09/2016	<0.001	<0.001	0.181	<0.001	0.125	<0.001	233	313	<0.001	0.0152	0.1	<0.001	0.0131	<0.0002	0.0012	6.6	0.35	<0.001	164	<0.001	954
08D	02/22/2017	<0.001	<0.001	0.167	<0.001	0.115	<0.001	220	262	<0.001	0.0078	<0.1	<0.001	0.0136	<0.0002	0.0011	6.8	0.38	<0.001	124	<0.001	1220
08D	04/27/2017	<0.001	<0.001	0.158	<0.001	0.118	0.0024	175	315	<0.001	0.0385	0.1	0.0015	0.0171	<0.0002	0.001	6.6	1.41	<0.001	119	<0.001	1250
08D	06/09/2017	<0.001	<0.001	0.184	<0.001	0.139	0.0011	208	366	<0.001	0.0162	<0.1	<0.001	0.0166	<0.0002	0.0017	6.8	0.94	<0.001	123	<0.001	1320
08D	09/07/2017	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.8	--	--	--	--	--
08D	11/16/2017	--	--	--	--	0.122	--	189	200	--	--	0.12	--	--	--	--	7.0	--	--	157	--	1200
08D	03/27/2018	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.7	--	--	--	--	--
08D	06/14/2018	<0.001	<0.001	0.171	<0.001	0.133	<0.002	204	315	<0.0015	0.0136	0.12	<0.001	0.0163	<0.0002	<0.0015	6.8	0.22	<0.001	114	<0.002	1310
08D	09/13/2018	--	--	0.22	--	0.0941	<0.001	252	269	0.0087	0.0112	<0.1	--	0.02	<0.0002	0.0021	6.7	0.41	<0.001	161	--	1330
08D	12/13/2018	--	--	--	--	0.116	--	205	251	--	--	0.11	--	--	--	--	6.8	--	--	182	--	1320
08D	03/14/2019	<0.001	0.0012	0.145	<0.001	0.17	0.0023	184	246	<0.0015	0.0157	0.12	0.0016	0.0199	<0.0002	0.0015	6.8	0.48	<0.001	143	<0.002	1220
08D	06/18/2019	--	<0.001	0.148	--	0.136	<0.002	180	232	<0.005	--	0.13	0.0012	--	<0.0002	<0.01	6.6	--	<0.001	134	--	--
08D	09/18/2019	--	<0.001	0.143	--	0.117	<0.001	187	226	--	0.0057	0.12	<0.001	0.0142	--	0.0016	6.7	0.42	<0.001	121	--	1230

TABLE 4-1. GROUNDWATER ANALYTICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Location	Sample Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Boron, total (mg/L)	Cadmium, total (mg/L)	Calcium, total (mg/L)	Chloride, 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)	pH (field) (SU)	Radium 226 and 228 combined (pCi/L)	Selenium, total (mg/L)	Sulfate, total (mg/L)	Thallium, total (mg/L)	Total Dissolved Solids (mg/L)
35 I.A.C. 845.600	Lower	0	0	0	0	0	0	--	0	0	0	0	0	0	0	0	6.5	0	0	0	0	0
	Upper	0.006	0.010	2.0	0.004	2	0.005	--	200	0.1	0.006	4.0	0.0075	0.04	0.002	0.1	9.0	5	0.05	400	0.002	1200
08D	12/12/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.7	--	--	--	--	--
08D	03/12/2020	<0.001	<0.001	0.127	<0.001	0.115	<0.001	182	217	<0.0015	0.0023	0.12	<0.001	0.0132	<0.0002	<0.0015	6.7	1.35	<0.001	142	<0.002	1110
08D	06/04/2020	--	<0.001	0.13	--	0.126	<0.002	187	246	<0.005	--	0.13	0.0011	--	<0.0002	<0.01	6.7	--	<0.001	179	--	--
08D	09/03/2020	<0.001	<0.001	0.131	<0.001	0.0942	<0.001	226	222	<0.0015	0.0042	0.11	<0.001	0.013	<0.0002	<0.0015	6.7	0.55	<0.001	213	<0.002	1200
08D	12/10/2020	<0.001	<0.001	0.148	<0.001	0.106	<0.001	264	260	<0.0015	0.0024	<0.1	<0.001	0.0137	<0.0002	<0.0015	6.7	--	<0.001	183	<0.002	1280
08D	02/24/2021	<0.001	<0.001	0.122	<0.001	0.109	<0.001	227	219	<0.0015	0.0025	0.11	<0.001	0.0141	<0.0002	<0.0015	7.1	0.0758	<0.001	189	<0.002	1250
08D	03/18/2021	<0.001	<0.001	0.128	<0.001	0.106	<0.001	224	243	<0.0015	0.0028	0.1	<0.001	0.0141	<0.0002	<0.0015	6.7	1.67	<0.001	199	<0.002	1250
08D	04/08/2021	<0.001	<0.001	0.128	<0.001	0.0979	<0.001	222	232	<0.0015	0.0028	0.1	<0.001	0.0133	<0.0002	<0.0015	6.6	0.518	<0.001	184	<0.002	1260
08D	05/06/2021	<0.002	<0.001	0.13	<0.001	0.102	<0.001	231	291	<0.001	0.00303	0.12	<0.001	0.0121	<0.0002	0.00132	6.5	0.023	<0.001	171	<0.001	1270
08D	06/08/2021	<0.001	<0.001	0.116	<0.001	0.122	<0.001	216	238	<0.0015	0.0029	0.1	<0.001	0.0127	<0.0002	<0.0015	6.5	0.56	<0.001	173	<0.002	1240
08D	06/24/2021	<0.001	<0.001	0.12	<0.001	0.108	<0.001	219	250	<0.0015	0.0037	0.12	<0.001	0.0137	<0.0002	<0.0015	6.5	1.11	<0.001	149	<0.002	1130
08D	07/13/2021	<0.001	<0.001	0.11	<0.001	0.0865	<0.001	191	252	<0.0015	0.0066	0.12	<0.001	0.014	<0.0002	<0.0015	6.3	0.766	<0.001	134	<0.002	1070
08D	08/03/2021	<0.001	<0.001	0.113	<0.001	0.103	<0.001	190	244	<0.0015	0.004	0.11	<0.001	0.0141	<0.0002	<0.0015	6.7	0.22	<0.001	146	<0.002	1110
12	03/19/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.4	--	--	--	--	--
12	06/22/2015	--	<0.001	0.0731	--	0.715	<0.002	101	78	<0.005	--	0.24	<0.001	--	<0.0002	0.0369	7.3	--	0.0028	99	--	--
12	09/17/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.4	--	--	--	--	--
12	12/09/2015	<0.001	<0.001	0.0424	<0.001	0.41	<0.001	71.4	73	<0.001	<0.001	0.24	<0.001	0.0148	<0.0002	0.0401	7.7	1	0.0016	71	<0.001	474
12	03/10/2016	<0.001	<0.001	0.0805	<0.001	0.423	<0.001	95.4	80	<0.001	<0.001	0.23	<0.001	0.0159	<0.0002	0.0324	7.1	0.266	0.0013	76	<0.001	568
12	06/08/2016	<0.001	<0.001	0.0385	<0.001	0.401	<0.002	69.5	89	<0.001	<0.001	0.24	<0.001	0.0129	<0.0002	0.0351	7.7	1.21	0.0011	72	<0.001	454
12	08/31/2016	<0.001	<0.001	0.0407	<0.001	0.247	<0.001	68.1	77	<0.001	<0.001	0.24	<0.001	0.011	<0.0002	0.0329	7.6	0.6	0.0013	68	<0.001	450
12	12/09/2016	<0.001	<0.001	0.047	<0.001	0.274	<0.001	69	63	<0.001	<0.001	0.27	<0.001	0.012	<0.0002	0.0374	7.2	0.85	0.0013	58	<0.001	436
12	02/22/2017	<0.001	<0.001	0.0393	<0.001	0.833	<0.001	67.4	68	<0.001	<0.001	0.19	<0.001	0.018	<0.0002	0.0171	7.5	0.07	0.0024	91	<0.001	444

TABLE 4-1. GROUNDWATER ANALYTICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Location	Sample Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Boron, total (mg/L)	Cadmium, total (mg/L)	Calcium, total (mg/L)	Chloride, 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)	pH (field) (SU)	Radium 226 and 228 combined (pCi/L)	Selenium, total (mg/L)	Sulfate, total (mg/L)	Thallium, total (mg/L)	Total Dissolved Solids (mg/L)
35 I.A.C. 845.600	Lower	0	0	0	0	0	0	--	0	0	0	0	0	0	0	0	6.5	0	0	0	0	0
	Upper	0.006	0.010	2.0	0.004	2	0.005	--	200	0.1	0.006	4.0	0.0075	0.04	0.002	0.1	9.0	5	0.05	400	0.002	1200
12	04/26/2017	<0.001	<0.001	0.0482	<0.001	0.476	<0.002	64.4	73	<0.001	<0.001	0.27	<0.001	0.0122	<0.0002	0.0374	7.3	0.46	0.0025	69	<0.001	430
12	06/09/2017	<0.001	<0.001	0.0509	<0.001	0.605	<0.001	74.1	68	<0.001	<0.001	0.25	<0.001	0.013	<0.0002	0.0318	7.5	0.56	0.0028	76	<0.001	414
12	09/07/2017	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.5	--	--	--	--	--
12	11/16/2017	--	--	--	--	0.344	--	69	64	--	--	0.3	--	--	--	--	7.6	--	--	53	--	460
12	03/26/2018	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.4	--	--	--	--	--
12	06/13/2018	<0.001	<0.001	0.0406	<0.001	0.388	<0.002	66.2	78	<0.0015	<0.001	0.28	<0.001	0.0145	<0.0002	0.0387	7.3	1.66	0.0013	65	<0.002	436
12	09/12/2018	--	--	0.0514	--	0.286	<0.001	79.3	89	0.0023	<0.001	0.25	--	0.0151	--	0.0408	7.4	0.62	0.0011	61	--	474
12	12/13/2018	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.3	--	--	--	--	--
12	03/13/2019	<0.001	<0.001	0.0783	<0.001	0.404	<0.001	105	83	<0.0015	<0.001	0.21	<0.001	0.0165	<0.0002	0.0193	7.3	0.05	0.0021	66	<0.002	548
12	06/18/2019	--	<0.001	0.0763	--	0.93	<0.002	94.3	79	<0.005	--	0.26	<0.001	--	<0.0002	0.0206	7.2	--	0.0093	88	--	--
12	09/17/2019	--	<0.001	0.064	--	0.345	<0.001	83.4	66	--	<0.001	0.28	<0.001	0.0148	--	0.0285	7.1	0.58	<0.001	58	--	510
12	12/11/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.1	--	--	--	--	--
12	03/11/2020	<0.001	<0.001	0.0774	<0.001	0.493	<0.001	89.6	62	<0.0015	<0.001	0.33	<0.001	0.0141	<0.0002	0.0232	7.2	0.66	0.0013	64	<0.002	496
12	06/04/2020	--	<0.001	0.0767	--	0.858	<0.002	97.2	66	<0.005	--	0.26	<0.001	--	<0.0002	0.0237	7.2	--	0.0084	95	--	--
12	09/02/2020	--	--	0.0609	--	0.402	--	76.2	57	--	--	0.3	--	0.0126	--	0.0322	7.4	0.63	<0.001	61	--	432
12	12/10/2020	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.3	--	--	--	--	--
12	03/18/2021	<0.001	<0.001	0.0806	<0.001	0.454	<0.001	91.9	77	<0.0015	<0.001	0.25	<0.001	0.0124	<0.0002	0.0254	7.2	0.231	0.0011	74	<0.002	540
12	06/23/2021	<0.001	<0.001	0.0547	<0.001	0.204	<0.001	79.4	79	<0.0015	<0.001	0.28	<0.001	0.0102	<0.0002	0.0288	7.2	--	<0.001	61	<0.002	--
13	03/19/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.5	--	--	--	--	--
13	06/22/2015	--	<0.001	0.0457	--	1.14	<0.002	73.4	82	<0.005	--	0.17	<0.001	--	<0.0002	0.012	7.4	--	0.0019	99	--	--
13	09/17/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.4	--	--	--	--	--
13	12/09/2015	<0.001	<0.001	0.0431	<0.001	0.86	<0.001	71	72	<0.001	<0.001	0.19	<0.001	0.023	<0.0002	0.0134	7.6	1	0.0014	81	<0.001	490

TABLE 4-1. GROUNDWATER ANALYTICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Location	Sample Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Boron, total (mg/L)	Cadmium, total (mg/L)	Calcium, total (mg/L)	Chloride, 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)	pH (field) (SU)	Radium 226 and 228 combined (pCi/L)	Selenium, total (mg/L)	Sulfate, total (mg/L)	Thallium, total (mg/L)	Total Dissolved Solids (mg/L)
35 I.A.C. 845.600	Lower	0	0	0	0	0	0	--	0	0	0	0	0	0	0	0	6.5	0	0	0	0	0
	Upper	0.006	0.010	2.0	0.004	2	0.005	--	200	0.1	0.006	4.0	0.0075	0.04	0.002	0.1	9.0	5	0.05	400	0.002	1200
13	03/10/2016	<0.001	<0.001	0.0504	<0.001	1.18	<0.001	82.9	80	<0.001	<0.001	0.18	<0.001	0.0238	<0.0002	0.0114	7.2	0.396	0.0028	98	<0.001	606
13	06/08/2016	<0.001	<0.001	0.0429	<0.001	0.997	<0.002	71.5	91	<0.001	<0.001	0.18	<0.001	0.0222	<0.0002	0.014	7.6	0.73	0.0021	101	<0.001	508
13	08/31/2016	<0.001	<0.001	0.0509	<0.001	0.383	<0.001	85.5	84	<0.001	<0.001	0.18	<0.001	0.0157	<0.0002	0.0196	7.6	0.58	0.0014	69	<0.001	452
13	12/09/2016	<0.001	<0.001	0.0351	<0.001	0.634	<0.001	66.7	85	0.0012	<0.001	0.2	<0.001	0.0165	<0.0002	0.0185	7.3	0.98	0.0011	84	<0.001	490
13	02/22/2017	<0.001	<0.001	0.0556	<0.001	0.303	<0.001	74.5	60	<0.001	<0.001	0.25	<0.001	0.0118	<0.0002	0.0348	7.3	0.67	0.0032	59	<0.001	432
13	04/27/2017	<0.001	<0.001	0.0394	<0.001	1.06	<0.002	63.9	72	<0.001	<0.001	0.2	<0.001	0.0199	<0.0002	0.0165	7.3	1.24	0.0029	107	<0.001	528
13	06/09/2017	<0.001	<0.001	0.0439	<0.001	1.26	<0.001	72.2	80	0.001	<0.001	0.2	<0.001	0.0201	<0.0002	0.0165	7.6	0.27	0.0038	112	<0.001	536
13	09/07/2017	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.5	--	--	--	--	--
13	11/16/2017	--	--	--	--	0.758	--	67	63	--	--	0.21	--	--	--	--	7.6	--	--	69	--	468
13	03/26/2018	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.6	--	--	--	--	--
13	06/13/2018	<0.001	<0.001	0.0401	<0.001	1.32	<0.002	70.7	71	<0.0015	<0.001	0.22	<0.001	0.0232	<0.0002	0.0214	7.3	0.94	0.0024	88	<0.002	516
13	09/12/2018	--	--	0.0466	--	0.484	<0.001	80.9	88	<0.0015	<0.001	0.19	--	0.0244	--	0.024	7.4	0.2	0.0014	73	--	482
13	12/13/2018	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.3	--	--	--	--	--
13	03/13/2019	<0.001	0.0011	0.0529	<0.001	1.41	<0.001	78.4	82	<0.0015	<0.001	0.23	<0.001	0.0281	<0.0002	0.019	7.6	0.81	0.0034	95	<0.002	548
13	06/18/2019	--	<0.001	0.0511	--	1.15	<0.002	86.7	77	<0.005	--	0.25	<0.001	--	<0.0002	0.0165	7.4	--	0.005	99	--	--
13	09/17/2019	--	<0.001	0.0428	--	1.14	<0.001	75.7	77	--	<0.001	0.26	<0.001	0.0207	--	0.0187	7.4	0	0.0022	92	--	552
13	12/11/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.3	--	--	--	--	--
13	03/11/2020	<0.001	<0.001	0.0469	<0.001	1.34	<0.001	79.9	72	<0.0015	<0.001	0.3	<0.001	0.025	<0.0002	0.0177	7.4	0.43	0.0033	98	<0.002	552
13	06/04/2020	--	<0.001	0.0478	--	1.07	<0.002	83	69	<0.005	--	0.24	<0.001	--	<0.0002	0.0172	7.5	--	0.0037	105	--	--
13	09/02/2020	--	--	0.0422	--	1	--	71.4	64	--	--	0.24	--	0.0207	--	0.0198	7.5	0.94	0.0019	81	--	456
13	12/10/2020	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.4	--	--	--	--	--
13	03/18/2021	<0.001	<0.001	0.0476	<0.001	1.12	<0.001	85	79	<0.0015	<0.001	0.24	<0.001	0.0244	<0.0002	0.0209	7.4	0.238	0.0024	96	<0.002	552

TABLE 4-1. GROUNDWATER ANALYTICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Location	Sample Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Boron, total (mg/L)	Cadmium, total (mg/L)	Calcium, total (mg/L)	Chloride, 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)	pH (field) (SU)	Radium 226 and 228 combined (pCi/L)	Selenium, total (mg/L)	Sulfate, total (mg/L)	Thallium, total (mg/L)	Total Dissolved Solids (mg/L)
35 I.A.C. 845.600	Lower	0	0	0	0	0	0	--	0	0	0	0	0	0	0	0	6.5	0	0	0	0	0
	Upper	0.006	0.010	2.0	0.004	2	0.005	--	200	0.1	0.006	4.0	0.0075	0.04	0.002	0.1	9.0	5	0.05	400	0.002	1200
13	06/23/2021	<0.001	<0.001	0.0435	<0.001	0.3	<0.001	81.9	85	<0.0015	<0.001	0.22	<0.001	0.0149	<0.0002	0.0194	7.2	--	<0.001	66	<0.002	--
16	03/19/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.6	--	--	--	--	--
16	06/22/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.4	--	--	--	--	--
16	09/17/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.4	--	--	--	--	--
16	03/14/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.3	--	--	--	--	--
16	06/18/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.3	--	--	--	--	--
16	09/18/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.1	--	--	--	--	--
16	12/12/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.2	--	--	--	--	--
16	03/12/2020	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.3	--	--	--	--	--
16	06/04/2020	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.6	--	--	--	--	--
16	09/03/2020	<0.001	<0.001	0.084	<0.001	0.116	<0.001	72.9	80	<0.0015	<0.001	0.27	<0.001	0.0072	<0.0002	0.0075	7.3	1.13	<0.001	66	<0.002	404
16	12/10/2020	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.4	--	--	--	--	--
16	02/24/2021	<0.001	<0.001	0.0779	<0.001	0.125	<0.001	80.9	68	<0.0015	<0.001	0.27	<0.001	0.00695	<0.0002	0.0062	7.7	0.798	<0.001	58	<0.002	470
16	03/18/2021	<0.001	<0.001	0.0857	<0.001	0.116	<0.001	88.5	68	<0.0015	<0.001	0.24	<0.001	0.0083	<0.0002	0.0059	7.4	0.376	<0.001	59	<0.002	532
16	04/08/2021	<0.001	<0.001	0.0769	<0.001	0.11	<0.001	80.8	73	<0.0015	<0.001	0.24	<0.001	0.0078	<0.0002	0.0064	7.2	1.73	<0.001	59	<0.002	488
16	05/06/2021	<0.002	<0.001	0.0646	<0.001	0.112	<0.001	68.4	101	<0.001	<0.001	0.29	<0.001	0.00651	<0.0002	0.0108	7.4	0.216	<0.001	68	<0.001	446
16	06/08/2021	<0.001	<0.001	0.0642	<0.001	0.129	<0.001	69.4	82	<0.0015	<0.001	0.28	<0.001	0.0067	<0.0002	0.0106	7.1	0.00746	<0.001	62	<0.002	442
16	06/23/2021	<0.001	<0.001	0.069	<0.001	0.109	<0.001	69.6	83	<0.0015	<0.001	0.27	<0.001	0.0069	<0.0002	0.0095	7.2	0.643	<0.001	60	<0.002	--
16	07/13/2021	<0.001	<0.001	0.0636	<0.001	0.0968	<0.001	65.4	62	<0.0015	<0.001	0.28	<0.001	0.0064	<0.0002	0.0098	7.2	0.628	<0.001	48	<0.002	360
16	08/03/2021	<0.001	<0.001	0.0713	<0.001	0.133	<0.001	77.5	70	<0.0015	<0.001	0.24	<0.001	0.0071	<0.0002	0.0075	7.1	0.167	<0.001	58	<0.002	418
17	03/19/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.8	--	--	--	--	--
17	06/22/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.7	--	--	--	--	--

TABLE 4-1. GROUNDWATER ANALYTICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Location	Sample Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Boron, total (mg/L)	Cadmium, total (mg/L)	Calcium, total (mg/L)	Chloride, 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)	pH (field) (SU)	Radium 226 and 228 combined (pCi/L)	Selenium, total (mg/L)	Sulfate, total (mg/L)	Thallium, total (mg/L)	Total Dissolved Solids (mg/L)
35 I.A.C. 845.600	Lower	0	0	0	0	0	0	--	0	0	0	0	0	0	0	0	6.5	0	0	0	0	0
	Upper	0.006	0.010	2.0	0.004	2	0.005	--	200	0.1	0.006	4.0	0.0075	0.04	0.002	0.1	9.0	5	0.05	400	0.002	1200
17	09/17/2015	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.5	--	--	--	--	--
17	03/14/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.4	--	--	--	--	--
17	06/18/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.2	--	--	--	--	--
17	09/18/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.1	--	--	--	--	--
17	12/12/2019	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.3	--	--	--	--	--
17	03/12/2020	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.4	--	--	--	--	--
17	06/04/2020	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.7	--	--	--	--	--
17	09/03/2020	<0.001	<0.001	0.0624	<0.001	0.123	<0.001	56	93	<0.0015	<0.001	0.3	<0.001	0.0066	<0.0002	0.0076	7.2	0.99	<0.001	70	<0.002	396
17	12/10/2020	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.4	--	--	--	--	--
17	02/24/2021	<0.001	<0.001	0.0931	<0.001	0.137	<0.001	121	81	<0.0015	<0.001	0.22	<0.001	0.00699	<0.0002	0.0056	7.6	0.382	<0.001	67	<0.002	646
17	03/18/2021	<0.001	<0.001	0.0896	<0.001	0.121	<0.001	109	81	<0.0015	<0.001	0.18	<0.001	0.0083	<0.0002	0.004	7.0	0.116	<0.001	63	<0.002	596
17	04/08/2021	<0.001	<0.001	0.0572	<0.001	0.0688	<0.001	65.2	77	<0.0015	<0.001	0.23	<0.001	0.0052	<0.0002	0.0053	7.3	0.103	<0.001	56	<0.002	410
17	05/06/2021	<0.002	<0.001	0.0629	<0.001	0.103	<0.001	65.5	116	<0.001	<0.001	0.32	<0.001	<0.005	<0.0002	0.00761	7.2	0.257	<0.001	65	<0.001	466
17	06/08/2021	<0.001	<0.001	0.0533	<0.001	0.105	<0.001	63.4	78	<0.0015	<0.001	0.29	<0.001	0.0058	<0.0002	0.0077	7.2	0.408	<0.001	56	<0.002	416
17	06/23/2021	<0.001	<0.001	0.0556	<0.001	0.0873	<0.001	65.4	80	<0.0015	<0.001	0.29	<0.001	0.0061	<0.0002	0.0076	7.1	0.511	<0.001	58	<0.002	--
17	07/13/2021	<0.001	<0.001	0.0531	<0.001	0.0822	<0.001	64.9	80	<0.0015	<0.001	0.29	<0.001	0.0066	<0.0002	0.0075	6.9	0.0926	<0.001	56	<0.002	388
17	08/03/2021	<0.001	<0.001	0.0504	<0.001	0.103	<0.001	65	79	<0.0015	<0.001	0.25	<0.001	0.0062	<0.0002	0.0065	7.2	0.0882	<0.001	57	<0.002	402
46	12/09/2015	<0.001	<0.001	0.0507	<0.001	0.205	<0.001	73.2	72	<0.001	<0.001	0.24	<0.001	0.0108	<0.0002	0.0389	7.6	0.16	<0.001	63	<0.001	434
46	03/10/2016	<0.001	<0.001	0.0562	<0.001	0.312	<0.001	84.5	81	0.0011	<0.001	0.23	<0.001	0.0119	<0.0002	0.039	7.3	0.753	0.0018	76	<0.001	524
46	06/08/2016	<0.001	<0.001	0.0483	<0.001	0.182	<0.001	71.7	91	<0.001	<0.001	0.23	<0.001	0.0088	<0.0002	0.0314	7.6	1.05	<0.001	74	<0.001	454
46	08/31/2016	<0.001	<0.001	0.0642	<0.001	0.264	<0.001	91	74	<0.001	<0.001	0.26	<0.001	0.009	<0.0002	0.0448	7.6	0.81	<0.001	62	<0.001	450
46	12/08/2016	<0.001	<0.001	0.0702	<0.001	0.278	<0.001	69	63	0.0012	<0.001	0.29	<0.001	0.0086	<0.0002	0.0574	7.4	0.96	0.0011	59	<0.001	424

TABLE 4-1. GROUNDWATER ANALYTICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Location	Sample Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Boron, total (mg/L)	Cadmium, total (mg/L)	Calcium, total (mg/L)	Chloride, 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)	pH (field) (SU)	Radium 226 and 228 combined (pCi/L)	Selenium, total (mg/L)	Sulfate, total (mg/L)	Thallium, total (mg/L)	Total Dissolved Solids (mg/L)
35 I.A.C. 845.600	Lower	0	0	0	0	0	0	--	0	0	0	0	0	0	0	0	6.5	0	0	0	0	0
	Upper	0.006	0.010	2.0	0.004	2	0.005	--	200	0.1	0.006	4.0	0.0075	0.04	0.002	0.1	9.0	5	0.05	400	0.002	1200
46	02/22/2017	<0.001	<0.001	0.0534	<0.001	0.209	<0.001	71.4	60	<0.001	<0.001	0.26	<0.001	0.0102	<0.0002	0.0375	7.5	0.32	0.0014	57	<0.001	424
46	04/26/2017	<0.001	<0.001	0.0499	<0.001	0.203	<0.001	63.2	65	<0.001	<0.001	0.26	<0.001	0.01	<0.0002	0.0334	7.1	3.21	0.0011	67	<0.001	398
46	06/09/2017	<0.001	<0.001	0.0507	<0.001	0.208	<0.001	70	69	<0.001	<0.001	0.25	<0.001	0.0092	<0.0002	0.0315	7.6	0.15	0.0011	69	<0.001	426
46	11/16/2017	--	--	--	--	0.191	--	73.3	72	--	--	0.29	--	--	--	--	7.6	--	--	60	--	420
46	06/13/2018	<0.001	<0.001	0.0543	<0.001	0.181	<0.001	69.8	85	<0.0015	<0.001	0.26	<0.001	0.0096	<0.0002	0.0299	7.4	0.04	<0.001	61	<0.002	452
46	09/13/2018	--	--	0.0566	--	0.247	<0.001	68.9	95	<0.0015	<0.001	0.26	--	0.0115	--	0.0356	7.4	0.4	<0.001	70	--	466
46	03/14/2019	<0.001	<0.001	0.0712	<0.001	0.277	<0.001	78.7	85	<0.0015	<0.001	0.25	<0.001	0.0112	<0.0002	0.0302	7.3	0.31	0.0012	63	<0.002	472
46	09/17/2019	--	<0.001	0.0621	--	0.298	<0.001	76.1	64	--	<0.001	0.28	<0.001	0.0113	--	0.0272	7.3	1.01	0.001	57	--	468
46	03/11/2020	<0.001	<0.001	0.0644	<0.001	0.407	<0.001	74.6	67	<0.0015	<0.001	0.32	<0.001	0.0117	<0.0002	0.0271	7.4	2.51	0.001	63	<0.002	468
46	09/03/2020	--	--	0.0653	--	0.289	--	77.7	58	--	--	0.27	--	0.0117	--	0.0254	7.0	0.72	<0.001	58	--	436
46	03/18/2021	<0.001	<0.001	0.0728	<0.001	0.254	<0.001	80.7	69	<0.0015	<0.001	0.26	<0.001	0.0112	<0.0002	0.0258	7.3	0.48	0.0011	63	<0.002	486
47	12/09/2015	<0.001	<0.001	0.0736	<0.001	0.219	<0.001	89.2	70	<0.001	<0.001	0.4	<0.001	0.0085	<0.0002	0.0617	7.2	1	<0.001	63	<0.001	394
47	03/10/2016	<0.001	<0.001	0.0714	<0.001	0.208	<0.001	92.3	89	<0.001	<0.001	0.35	<0.001	0.0069	<0.0002	0.0618	7.2	0.465	<0.001	71	<0.001	544
47	06/08/2016	<0.001	<0.001	0.0904	<0.001	0.539	<0.001	112	88	<0.001	0.0023	0.4	<0.001	0.0132	<0.0002	0.0681	6.9	1.34	<0.001	96	<0.001	520
47	09/01/2016	<0.001	<0.001	0.0877	<0.001	0.459	<0.001	114	86	<0.001	<0.001	0.38	<0.001	0.0101	<0.0002	0.0557	7.3	0.63	<0.001	86	<0.001	546
47	12/09/2016	<0.001	<0.001	0.0635	<0.001	0.167	<0.001	85.3	63	<0.001	<0.001	0.38	<0.001	0.0081	<0.0002	0.0491	7.1	0.13	<0.001	59	<0.001	440
47	02/22/2017	<0.001	<0.001	0.0707	<0.001	0.163	<0.001	81.4	61	<0.001	<0.001	0.33	<0.001	0.0066	<0.0002	0.0449	7.2	0.35	<0.001	58	<0.001	406
47	04/26/2017	<0.001	<0.001	0.073	<0.001	0.491	<0.001	76.7	73	<0.001	0.0013	0.37	<0.001	0.0089	<0.0002	0.0471	6.9	0.69	<0.001	83	<0.001	492
47	06/09/2017	<0.001	<0.001	0.0717	<0.001	0.335	<0.001	84.3	79	<0.001	0.0047	0.4	<0.001	0.0093	<0.0002	0.0512	7.4	0.37	<0.001	64	<0.001	462
47	11/16/2017	--	--	--	--	0.183	--	96.5	73	--	--	0.34	--	--	--	--	7.1	--	--	65	--	442
47	06/13/2018	<0.001	<0.001	0.0811	<0.001	0.714	<0.001	90.8	76	<0.0015	0.002	0.35	<0.001	0.0116	<0.0002	0.0406	6.7	0.23	<0.001	81	<0.002	552
47	09/12/2018	--	--	0.107	--	0.174	<0.001	111	87	<0.0015	<0.001	0.29	--	0.0146	--	0.0436	7.0	0.11	<0.001	73	--	530

TABLE 4-1. GROUNDWATER ANALYTICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Location	Sample Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Boron, total (mg/L)	Cadmium, total (mg/L)	Calcium, total (mg/L)	Chloride, 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)	pH (field) (SU)	Radium 226 and 228 combined (pCi/L)	Selenium, total (mg/L)	Sulfate, total (mg/L)	Thallium, total (mg/L)	Total Dissolved Solids (mg/L)
35 I.A.C. 845.600	Lower	0	0	0	0	0	0	--	0	0	0	0	0	0	0	0	6.5	0	0	0	0	0
	Upper	0.006	0.010	2.0	0.004	2	0.005	--	200	0.1	0.006	4.0	0.0075	0.04	0.002	0.1	9.0	5	0.05	400	0.002	1200
47	03/14/2019	<0.001	0.001	0.087	<0.001	0.309	<0.001	96.6	78	<0.0015	<0.001	0.31	<0.001	0.0101	<0.0002	0.0387	7.1	0.18	<0.001	63	<0.002	502
47	09/17/2019	--	<0.001	0.0871	--	0.156	<0.001	99	71	--	<0.001	0.31	<0.001	0.0095	--	0.0287	7.0	0.33	<0.001	54	--	520
47	03/11/2020	<0.001	<0.001	0.0821	<0.001	0.19	<0.001	90.5	63	<0.0015	<0.001	0.37	<0.001	0.0089	<0.0002	0.0308	7.2	1.11	<0.001	53	<0.002	462
47	09/02/2020	--	--	0.0932	--	0.158	--	94.1	69	--	--	0.29	--	0.0083	--	0.0245	7.1	0.39	--	51	--	478
47	03/18/2021	<0.001	<0.001	0.0939	<0.001	0.15	<0.001	98.1	85	<0.0015	<0.001	0.27	<0.001	0.0091	<0.0002	0.0271	7.2	0.418	<0.001	66	<0.002	548
52	02/24/2021	<0.001	<0.001	0.0845	<0.001	0.155	<0.001	85.9	77	<0.0015	0.001	0.31	<0.001	0.00787	<0.0002	0.0095	7.7	1.02	<0.001	75	<0.002	500
52	03/22/2021	<0.001	<0.001	0.093	<0.001	0.211	<0.001	88.1	75	<0.0015	<0.001	0.29	<0.001	0.0085	<0.0002	0.009	7.2	0.596	<0.001	63	<0.002	518
52	04/07/2021	<0.001	<0.001	0.0873	<0.001	0.226	<0.001	88.7	69	<0.0015	<0.001	0.3	<0.001	0.0097	<0.0002	0.0087	7.2	0.499	<0.001	63	<0.002	506
52	05/06/2021	<0.002	<0.001	0.0719	<0.001	0.153	<0.001	76.5	109	<0.001	<0.001	0.29	<0.001	0.0051	<0.0002	0.011	7.2	0.115	<0.001	64	<0.001	472
52	06/08/2021	<0.001	<0.001	0.0649	<0.001	0.119	<0.001	71	82	<0.0015	<0.001	0.32	<0.001	0.0063	<0.0002	0.0139	7.1	0.682	<0.001	65	<0.002	416
52	06/24/2021	<0.001	<0.001	0.0709	<0.001	0.118	<0.001	72	77	<0.0015	<0.001	0.34	<0.001	0.0078	<0.0002	0.0153	7.3	1.77	<0.001	58	<0.002	--
52	07/13/2021	<0.001	<0.001	0.0666	<0.001	0.121	<0.001	67.7	73	<0.0015	<0.001	0.34	<0.001	0.0061	<0.0002	0.0143	6.8	0.732	<0.001	57	<0.002	372
52	08/03/2021	<0.001	<0.001	0.081	<0.001	0.133	<0.001	84.5	66	<0.0015	<0.001	0.28	<0.001	0.0078	<0.0002	0.0114	7.0	0.661	<0.001	54	0.0025	442
53	02/25/2021	<0.001	<0.001	0.106	<0.001	0.142	0.0019	109	114	<0.0015	0.011	0.28	0.0036	0.0234	<0.0002	0.006	7.1	0.338	<0.001	76	<0.002	640
53	03/19/2021	<0.001	<0.001	0.102	<0.001	0.135	0.0016	105	102	<0.0015	0.0074	0.26	0.0029	0.0193	<0.0002	0.0059	7.0	0.484	<0.001	70	<0.002	622
53	04/08/2021	<0.001	<0.001	0.104	<0.001	0.173	0.0017	105	99	<0.0015	0.0113	0.25	0.0029	0.0256	<0.0002	0.0052	6.9	0.132	<0.001	72	<0.002	644
53	05/06/2021	<0.002	<0.001	0.0547	<0.001	0.104	<0.001	78.6	112	<0.001	<0.001	0.3	<0.001	0.0057	<0.0002	0.00708	7.2	0	<0.001	64	<0.001	490
54	02/24/2021	<0.001	<0.001	0.0766	<0.001	0.893	<0.001	97.3	84	<0.0015	0.0018	0.41	<0.001	0.017	<0.0002	0.0309	7.9	0.222	<0.001	83	<0.002	542
54	03/22/2021	<0.001	<0.001	0.0708	<0.001	0.682	<0.001	91.8	88	<0.0015	<0.001	0.37	<0.001	0.0154	<0.0002	0.03	7.2	0.333	<0.001	70	<0.002	544
54	04/07/2021	<0.001	<0.001	0.0672	<0.001	0.753	<0.001	91.3	88	<0.0015	0.0011	0.37	<0.001	0.0193	<0.0002	0.0284	7.2	0.135	<0.001	70	<0.002	510
54	05/05/2021	<0.002	<0.001	0.0694	<0.001	1.09	<0.001	94.6	77	<0.001	<0.001	0.34	<0.001	0.0151	<0.0002	0.0235	7.0	0.173	<0.001	104	<0.001	--
54	06/08/2021	<0.001	<0.001	0.0619	<0.001	1.03	<0.001	92.3	84	<0.0015	<0.001	0.32	<0.001	0.0172	<0.0002	0.0178	6.8	0.447	0.0017	107	<0.002	528

TABLE 4-1. GROUNDWATER ANALYTICAL RESULTS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Location	Sample Date	Antimony, total (mg/L)	Arsenic, total (mg/L)	Barium, total (mg/L)	Beryllium, total (mg/L)	Boron, total (mg/L)	Cadmium, total (mg/L)	Calcium, total (mg/L)	Chloride, 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)	pH (field) (SU)	Radium 226 and 228 combined (pCi/L)	Selenium, total (mg/L)	Sulfate, total (mg/L)	Thallium, total (mg/L)	Total Dissolved Solids (mg/L)
35 I.A.C. 845.600	Lower	0	0	0	0	0	0	--	0	0	0	0	0	0	0	0	6.5	0	0	0	0	0
	Upper	0.006	0.010	2.0	0.004	2	0.005	--	200	0.1	0.006	4.0	0.0075	0.04	0.002	0.1	9.0	5	0.05	400	0.002	1200
54	06/23/2021	<0.001	<0.001	0.0578	<0.001	0.859	<0.001	86.4	76	<0.0015	<0.001	0.33	<0.001	0.0163	<0.0002	0.0196	7.2	1.35	0.0016	90	<0.002	--
54	07/13/2021	<0.001	<0.001	0.0578	<0.001	0.678	<0.001	87.2	85	<0.0015	<0.001	0.34	<0.001	0.0138	<0.0002	0.0189	7.0	0.204	0.0017	78	<0.002	484
54	08/03/2021	<0.001	<0.001	0.0513	<0.001	0.595	<0.001	86.7	84	<0.0015	<0.001	0.32	<0.001	0.0133	<0.0002	0.0189	7.1	0.353	0.0012	89	<0.002	482
55	02/25/2021	<0.001	0.0025	0.101	<0.001	0.49	<0.001	90	133	0.019	0.0071	0.26	0.003	0.0369	<0.0002	0.0035	7.5	0.488	<0.001	33	<0.002	596
55	03/22/2021	<0.001	0.0016	0.107	<0.001	0.469	<0.001	82.9	143	0.007	0.0028	0.26	0.0013	0.0304	<0.0002	0.0071	7.2	1.67	<0.001	32	<0.002	602
55	04/07/2021	<0.001	0.0013	0.101	<0.001	0.729	<0.001	81.6	142	0.0037	0.0016	0.25	<0.001	0.0414	<0.0002	0.0058	7.1	0.17	<0.001	32	<0.002	598
55	05/05/2021	<0.002	<0.001	0.178	<0.001	0.559	<0.001	79.4	139	0.00253	<0.001	0.27	<0.001	0.026	<0.0002	0.0074	7.2	1.04	<0.001	29	<0.001	--
55	08/03/2021	<0.001	<0.001	0.19	<0.001	0.455	<0.001	75.1	146	0.0018	<0.001	0.29	<0.001	0.0313	<0.0002	0.0115	7.2	1.74	<0.001	22	<0.002	558

Notes:

Detected at concentration greater than the GWPS

-- = data not available

GWPS = Groundwater Protection Standard

mg/L = milligrams per liter

pCi/L = picocuries 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 exceedances above Part 845 standards.

35 I.A.C. 845.600 = Residuals in Surface Impoundments: Title 35 of the Illinois Administrative Code § 845

TABLE 4-2. GROUNDWATER FIELD PARAMETERS
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	Sample Date	Dissolved Oxygen (mg/L)	Oxidation Reduction Potential (mV)	pH (field) (SU)	Specific Conductance (micromhos/cm)	Temperature (deg. C)	Turbidity (NTU)
07	03/19/2015	--	--	7.1	769	11.3	--
07	06/23/2015	--	--	6.8	959	12.1	--
07	09/17/2015	--	--	7.1	710	13.0	--
07	12/09/2015	--	--	7.0	1160	12.3	--
07	03/10/2016	1.18	201	6.9	668	10.9	<1
07	06/07/2016	3.48	191	6.6	785	11.3	<1
07	06/08/2016	--	--	6.6	785	11.3	--
07	07/29/2016	3.10	124	7.5	778	13.0	<1
07	09/01/2016	3.90	258	6.9	805	12.6	<1
07	12/09/2016	6.01	291	6.8	1050	9.9	3
07	02/22/2017	1.81	142	7.0	809	12.3	<1
07	04/27/2017	<1	173	6.7	841	10.6	<1
07	06/08/2017	9.07	172	6.9	815	13.7	<1
07	09/07/2017	--	--	6.9	1085	12.0	--
07	11/16/2017	4.35	166	7.2	892	11.2	<1
07	03/27/2018	<1	180	6.8	966	12.2	<1
07	06/14/2018	3.93	134	6.8	990	12.6	<1
07	09/13/2018	4.05	178	6.8	914	17.1	<1
07	12/13/2018	3.60	164	7.0	1140	10.6	<1
07	03/14/2019	5.79	140	6.9	1110	13.7	<1
07	06/18/2019	--	--	7.0	1030	11.5	--
07	09/18/2019	5.76	179	6.3	1160	11.5	<1
07	12/12/2019	--	--	6.8	1020	10.1	--
07	03/12/2020	5.30	165	6.7	1080	10.7	3
07	06/04/2020	--	--	6.9	886	12.7	--
07	09/03/2020	5.66	163	6.8	1100	12.6	1.4
07	12/10/2020	5.05	114	6.9	880	11.0	1.9
07	02/24/2021	1.99	121	7.3	1030	10.7	1.1
07	03/18/2021	3.00	358	6.9	1220	11.0	2.6
07	04/07/2021	1.02	108	6.8	1110	11.4	<1
07	05/05/2021	2.14	163	6.7	1540	11.2	<1
07	06/08/2021	2.50	171	6.7	1250	12.1	1
07	06/24/2021	1.26	69	6.8	1200	11.4	<1
07	07/13/2021	3.00	156	6.5	1300	11.5	2.2
07	08/03/2021	1.77	14	6.9	1050	11.6	<1
08	03/19/2015	--	--	6.9	1270	12.9	--
08	06/22/2015	--	--	6.7	1720	14.0	--
08	09/16/2015	--	--	6.8	1110	13.8	--
08	12/08/2015	<1	153	6.8	1990	13.5	<1
08	03/10/2016	<1	191	6.7	1060	12.8	<1
08	06/07/2016	2.03	174	6.6	1120	12.9	<1
08	09/01/2016	<1	247	6.7	1550	18.8	1.8
08	12/09/2016	2.70	275	6.6	1960	12.0	<1
08	02/22/2017	<1	148	6.9	1710	14.7	<1

TABLE 4-2. GROUNDWATER FIELD PARAMETERS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Dissolved Oxygen (mg/L)	Oxidation Reduction Potential (mV)	pH (field) (SU)	Specific Conductance (micromhos/cm)	Temperature (deg. C)	Turbidity (NTU)
08	04/27/2017	<1	172	6.7	2130	12.4	<1
08	06/09/2017	3.99	156	6.9	1570	15.7	<1
08	09/07/2017	--	--	6.7	1760	14.7	--
08	11/16/2017	1.01	175	7.0	2040	13.5	<1
08	03/27/2018	<1	186	6.7	2230	14.8	<1
08	06/14/2018	<1	87	6.7	2260	15.2	<1
08	09/13/2018	2.42	172	6.7	2170	15.0	<1
08	12/13/2018	1.07	178	6.8	2420	13.5	1.5
08	03/14/2019	1.00	136	6.8	2900	16.1	<1
08	06/18/2019	--	--	6.6	2210	14.3	--
08	09/18/2019	2.30	160	6.6	2230	14.3	<1
08	12/12/2019	--	--	6.6	2540	13.6	--
08	03/12/2020	2.80	157	6.7	1950	13.4	3.7
08	06/04/2020	--	--	6.7	1770	14.1	--
08	09/03/2020	3.27	197	6.7	1710	14.1	2.4
08	12/10/2020	2.71	105	6.7	1570	13.1	2.2
08	02/24/2021	0.98	96	7.2	1560	13.0	2.5
08	03/18/2021	1.05	147	6.7	1720	13.1	<1
08	04/08/2021	0.84	58	6.6	2140	13.2	<1
08	05/06/2021	0.65	106	6.6	2180	13.3	<1
08	06/08/2021	1.17	158	6.5	2130	13.5	<1
08	06/24/2021	0.65	110	6.6	2230	13.4	<1
08	07/13/2021	0.98	123	6.4	2180	13.5	2.5
08	08/03/2021	1.36	66	6.6	1820	13.5	<1
08D	03/19/2015	--	--	6.9	1310	12.9	--
08D	06/22/2015	--	--	6.7	1690	15.1	--
08D	09/16/2015	--	--	6.8	1170	15.2	--
08D	12/08/2015	<1	143	6.9	1870	14.2	<1
08D	03/10/2016	<1	175	6.7	1280	12.7	<1
08D	06/07/2016	<1	146	6.6	1210	13.4	<1
08D	09/01/2016	6.00	247	6.6	2090	14.9	<1
08D	12/09/2016	<1	288	6.6	2210	12.1	1.9
08D	02/22/2017	<1	146	6.8	1850	14.6	<1
08D	04/27/2017	<1	174	6.6	2130	13.0	<1
08D	06/09/2017	3.65	160	6.8	2220	18.3	<1
08D	09/07/2017	--	--	6.8	2120	14.7	--
08D	11/16/2017	1.57	177	7.0	1880	14.2	<1
08D	03/27/2018	<1	187	6.7	2120	14.7	<1
08D	06/14/2018	<1	75	6.8	2450	15.5	<1
08D	09/13/2018	<1	160	6.7	2530	15.6	<1
08D	12/13/2018	<1	151	6.8	2220	13.8	3.4
08D	03/14/2019	<1	134	6.8	2646	14.9	1
08D	06/18/2019	--	--	6.6	2010	15.1	--
08D	09/18/2019	<1	167	6.7	2180	14.4	<1

TABLE 4-2. GROUNDWATER FIELD PARAMETERS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Dissolved Oxygen (mg/L)	Oxidation Reduction Potential (mV)	pH (field) (SU)	Specific Conductance (micromhos/cm)	Temperature (deg. C)	Turbidity (NTU)
08D	12/12/2019	--	--	6.7	1950	13.7	--
08D	03/12/2020	<1	149	6.7	1920	13.1	2.2
08D	06/04/2020	--	--	6.7	1660	14.5	--
08D	09/03/2020	1.00	185	6.7	2050	14.5	1.6
08D	12/10/2020	1.00	48	6.7	1610	13.0	2.1
08D	02/24/2021	0.28	133	7.1	1720	13.1	4.4
08D	03/18/2021	0.28	352	6.7	2100	13.2	4.4
08D	04/08/2021	0.19	-7	6.6	2070	13.4	<1
08D	05/06/2021	0.65	84	6.5	2170	13.3	<1
08D	06/08/2021	0.39	160	6.5	2040	13.9	<1
08D	06/24/2021	0.95	89	6.5	2180	14.0	<1
08D	07/13/2021	0.44	108	6.3	2080	14.0	1
08D	08/03/2021	0.42	15	6.7	1840	14.0	<1
12	03/19/2015	--	--	7.4	645	14.5	--
12	06/22/2015	--	--	7.3	963	18.4	--
12	09/17/2015	--	--	7.4	450	17.5	--
12	12/09/2015	<1	92	7.7	556	18.2	<1
12	03/10/2016	<1	174	7.1	605	15.4	1.2
12	06/08/2016	3.20	177	7.7	488	17.0	<1
12	08/31/2016	6.03	224	7.6	610	19.5	<1
12	12/09/2016	2.59	237	7.2	566	16.4	<1
12	02/22/2017	2.90	111	7.5	558	19.4	<1
12	04/26/2017	<1	109	7.3	624	17.5	<1
12	06/09/2017	4.82	141	7.5	680	21.0	<1
12	09/07/2017	--	--	7.5	716	16.8	--
12	11/16/2017	<1	162	7.6	622	17.6	<1
12	03/26/2018	<1	80	7.4	926	18.6	<1
12	06/13/2018	7.59	111	7.3	688	20.6	<1
12	09/12/2018	2.17	153	7.4	671	21.1	<1
12	12/13/2018	--	--	7.3	884	17.4	--
12	03/13/2019	2.71	108	7.3	1090	15.8	<1
12	06/18/2019	--	--	7.2	951	17.9	--
12	09/17/2019	1.25	118	7.1	833	18.5	<1
12	12/11/2019	--	--	7.1	807	17.6	--
12	03/11/2020	1.60	123	7.2	840	17.9	2.6
12	06/04/2020	--	--	7.2	792	17.9	--
12	09/02/2020	1.07	99	7.4	721	18.1	1.1
12	12/10/2020	--	--	7.3	728	17.7	--
12	03/18/2021	3.07	356	7.2	911	16.9	1.5
12	06/23/2021	4.58	57	7.2	955	16.4	<1
13	03/19/2015	--	--	7.5	664	15.3	--
13	06/22/2015	--	--	7.4	867	17.8	--
13	09/17/2015	--	--	7.4	701	16.7	--
13	12/09/2015	<1	95	7.6	593	17.0	<1

TABLE 4-2. GROUNDWATER FIELD PARAMETERS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Dissolved Oxygen (mg/L)	Oxidation Reduction Potential (mV)	pH (field) (SU)	Specific Conductance (micromhos/cm)	Temperature (deg. C)	Turbidity (NTU)
13	03/10/2016	3.11	175	7.2	596	15.6	2.3
13	06/08/2016	<1	138	7.6	522	16.1	<1
13	08/31/2016	3.65	241	7.6	620	17.8	<1
13	12/09/2016	7.71	258	7.3	635	14.6	2.3
13	02/22/2017	<1	136	7.3	616	18.1	<1
13	04/27/2017	<1	148	7.3	723	15.5	<1
13	06/09/2017	5.29	141	7.6	766	18.6	<1
13	09/07/2017	--	--	7.5	773	16.5	--
13	11/16/2017	6.63	165	7.6	625	16.2	<1
13	03/26/2018	<1	62	7.6	857	17.9	<1
13	06/13/2018	5.48	102	7.3	755	19.2	<1
13	09/12/2018	9.99	124	7.4	695	18.6	<1
13	12/13/2018	--	--	7.3	885	16.5	--
13	03/13/2019	<1	98	7.6	1010	16.6	<1
13	06/18/2019	--	--	7.4	986	17.7	--
13	09/17/2019	<1	96	7.4	912	17.7	<1
13	12/11/2019	--	--	7.3	863	16.4	--
13	03/11/2020	<1	119	7.4	891	16.9	2.4
13	06/04/2020	--	--	7.5	807	17.3	--
13	09/02/2020	1.00	118	7.5	768	17.5	1.2
13	12/10/2020	--	--	7.4	696	17.1	--
13	03/18/2021	0.30	344	7.4	918	16.4	<1
13	06/23/2021	4.09	70	7.2	964	16.4	<1
16	03/19/2015	--	--	7.6	548	17.0	--
16	06/22/2015	--	--	7.4	771	15.8	--
16	09/17/2015	--	--	7.4	562	21.3	--
16	12/08/2015	--	--	7.4	800	19.2	--
16	03/10/2016	--	--	7.4	520	16.0	--
16	06/08/2016	--	--	7.6	492	13.9	--
16	09/01/2016	--	--	7.7	580	22.2	--
16	12/09/2016	--	--	7.3	588	16.9	--
16	02/22/2017	--	--	7.1	525	19.0	--
16	04/27/2017	--	--	7.2	589	14.8	--
16	09/07/2017	--	--	7.4	711	22.6	--
16	11/16/2017	--	--	7.6	608	17.1	--
16	03/27/2018	1.97	170	7.4	648	18.2	<1
16	06/14/2018	3.56	132	7.0	741	19.4	<1
16	09/13/2018	2.20	116	7.3	755	24.2	2.8
16	12/13/2018	--	--	7.4	844	15.6	--
16	03/14/2019	--	--	7.3	873	17.9	--
16	06/18/2019	--	--	7.3	754	19.6	--
16	09/18/2019	--	--	7.1	866	23.3	--
16	12/12/2019	--	--	7.2	782	16.3	--
16	03/12/2020	--	--	7.3	713	17.0	--

TABLE 4-2. GROUNDWATER FIELD PARAMETERS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Dissolved Oxygen (mg/L)	Oxidation Reduction Potential (mV)	pH (field) (SU)	Specific Conductance (micromhos/cm)	Temperature (deg. C)	Turbidity (NTU)
16	06/04/2020	--	--	7.6	537	18.8	--
16	09/03/2020	2.02	144	7.3	807	24.9	1.3
16	12/10/2020	--	--	7.4	673	13.9	--
16	02/24/2021	5.66	163	7.7	671	13.1	2.2
16	03/18/2021	6.55	122	7.4	740	14.4	<1
16	04/08/2021	3.80	106	7.2	861	15.6	<1
16	05/06/2021	6.65	185	7.4	901	16.8	<1
16	06/08/2021	3.24	153	7.1	841	20.0	<1
16	06/23/2021	4.30	80	7.2	915	22.9	<1
16	07/13/2021	0.86	98	7.2	771	23.3	2
16	08/03/2021	0.39	61	7.1	796	23.4	<1
17	03/19/2015	--	--	7.8	551	13.0	--
17	06/22/2015	--	--	7.7	699	17.5	--
17	09/17/2015	--	--	7.5	567	22.8	--
17	12/08/2015	--	--	7.6	818	18.1	--
17	03/10/2016	--	--	7.4	508	13.0	--
17	06/08/2016	--	--	7.7	485	15.0	--
17	09/01/2016	--	--	7.7	570	21.0	--
17	12/09/2016	--	--	7.5	596	13.1	--
17	02/22/2017	--	--	7.6	546	17.3	--
17	04/27/2017	--	--	7.0	577	13.2	--
17	09/07/2017	--	--	7.2	802	22.2	--
17	11/16/2017	--	--	7.6	604	9.8	--
17	03/27/2018	<1	175	7.3	657	16.9	1.1
17	06/14/2018	5.25	97	7.5	642	23.3	<1
17	09/13/2018	3.43	144	7.2	694	24.8	<1
17	12/13/2018	--	--	7.5	835	12.3	--
17	03/14/2019	--	--	7.4	866	16.2	--
17	06/18/2019	--	--	7.2	691	20.6	--
17	09/18/2019	--	--	7.1	797	24.0	--
17	12/12/2019	--	--	7.3	678	15.4	--
17	03/12/2020	--	--	7.4	747	16.0	--
17	06/04/2020	--	--	7.7	519	23.0	--
17	09/03/2020	1.52	144	7.2	762	25.3	1.8
17	12/10/2020	--	--	7.4	655	15.3	--
17	02/24/2021	0.73	118	7.6	936	15.3	9
17	03/18/2021	2.50	339	7.0	1030	18.0	<1
17	04/08/2021	9.25	108	7.3	756	14.4	<1
17	05/06/2021	8.67	175	7.2	940	15.7	<1
17	06/08/2021	7.50	153	7.2	803	19.0	<1
17	06/23/2021	7.10	87	7.1	874	20.9	<1
17	07/13/2021	6.35	114	6.9	803	21.6	1
17	08/03/2021	4.47	73	7.2	744	20.2	<1
46	12/09/2015	1.32	88	7.6	558	19.0	<1

TABLE 4-2. GROUNDWATER FIELD PARAMETERS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Dissolved Oxygen (mg/L)	Oxidation Reduction Potential (mV)	pH (field) (SU)	Specific Conductance (micromhos/cm)	Temperature (deg. C)	Turbidity (NTU)
46	03/10/2016	<1	170	7.3	560	16.3	<1
46	06/08/2016	4.82	182	7.6	481	16.6	<1
46	08/31/2016	1.55	248	7.6	629	17.5	<1
46	12/08/2016	2.96	235	7.4	599	16.4	<1
46	02/22/2017	<1	33	7.5	550	20.2	<1
46	04/26/2017	<1	127	7.1	606	18.0	<1
46	06/09/2017	6.28	120	7.6	649	19.8	<1
46	11/16/2017	1.13	165	7.6	637	17.2	<1
46	06/13/2018	6.27	124	7.4	713	19.9	<1
46	09/13/2018	2.63	244	7.4	742	18.4	<1
46	03/14/2019	<1	97	7.3	937	17.7	<1
46	09/17/2019	1.38	112	7.3	804	19.0	<1
46	03/11/2020	<1	120	7.4	768	16.6	2.4
46	09/03/2020	1.30	149	7.0	778	18.6	1.2
46	03/18/2021	1.38	347	7.3	840	16.0	1.6
47	12/09/2015	<1	111	7.2	619	19.9	<1
47	03/10/2016	<1	174	7.2	584	16.6	<1
47	06/08/2016	<1	134	6.9	565	17.7	<1
47	09/01/2016	<1	243	7.3	728	18.4	<1
47	12/09/2016	1.07	229	7.1	628	17.7	1.1
47	02/22/2017	7.30	124	7.2	585	20.2	1.2
47	04/26/2017	<1	112	6.9	834	18.0	<1
47	06/09/2017	6.01	131	7.4	736	21.4	0
47	11/16/2017	<1	166	7.1	737	17.9	<1
47	06/13/2018	<1	114	6.7	836	19.8	<1
47	09/12/2018	<1	123	7.0	818	22.2	<1
47	03/14/2019	1.00	107	7.1	1020	18.5	<1
47	09/17/2019	<1	85	7.0	904	22.6	<1
47	03/11/2020	1.60	108	7.2	791	17.7	2.3
47	09/02/2020	1.00	103	7.1	648	22.5	1.4
47	03/18/2021	3.01	118	7.2	789	15.6	<1
52	02/24/2021	0.66	23	7.7	741	12.0	9.8
52	03/22/2021	0.31	137	7.2	729	16.7	<1
52	04/07/2021	0.64	46	7.2	890	16.8	<1
52	05/06/2021	5.01	167	7.2	954	15.2	<1
52	06/08/2021	4.13	137	7.1	822	19.0	1
52	06/24/2021	2.36	89	7.3	884	22.0	<1
52	07/13/2021	1.86	103	6.8	807	22.4	1
52	08/03/2021	0.67	-34	7.0	800	23.3	1.2
53	02/25/2021	0.38	30	7.1	960	16.9	9.9
53	03/19/2021	0.53	189	7.0	1240	16.2	8.6
53	04/08/2021	0.39	50	6.9	1220	16.4	9.6
53	05/06/2021	0.63	90	7.2	1090	16.0	<1
54	02/24/2021	0.86	-22	7.9	765	16.0	9.5

TABLE 4-2. GROUNDWATER FIELD PARAMETERS
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	Sample Date	Dissolved Oxygen (mg/L)	Oxidation Reduction Potential (mV)	pH (field) (SU)	Specific Conductance (micromhos/cm)	Temperature (deg. C)	Turbidity (NTU)
54	03/22/2021	0.78	102	7.2	919	17.7	3.7
54	04/07/2021	1.37	7	7.2	912	17.7	<1
54	05/05/2021	2.22	199	7.0	1240	17.4	<1
54	06/08/2021	0.53	121	6.8	997	18.0	<1
54	06/23/2021	0.93	5	7.2	1030	18.0	<1
54	07/13/2021	2.06	108	7.0	969	17.4	2.8
54	08/03/2021	2.40	28	7.1	864	17.4	<1
55	02/25/2021	0.40	-125	7.5	785	13.0	280
55	03/22/2021	0.66	-97	7.2	1080	16.0	5800
55	04/07/2021	0.35	-132	7.1	1080	16.7	35
55	05/05/2021	5.78	-67	7.2	1430	18.0	<1
55	08/03/2021	3.55	40	7.2	1070	23.5	110

Notes:

Field readings are reported with as many significant figures as provided by analytical laboratory.

-- = data not available

cm = centimeter

deg. C = degrees Celsius

mg/L = milligrams per liter

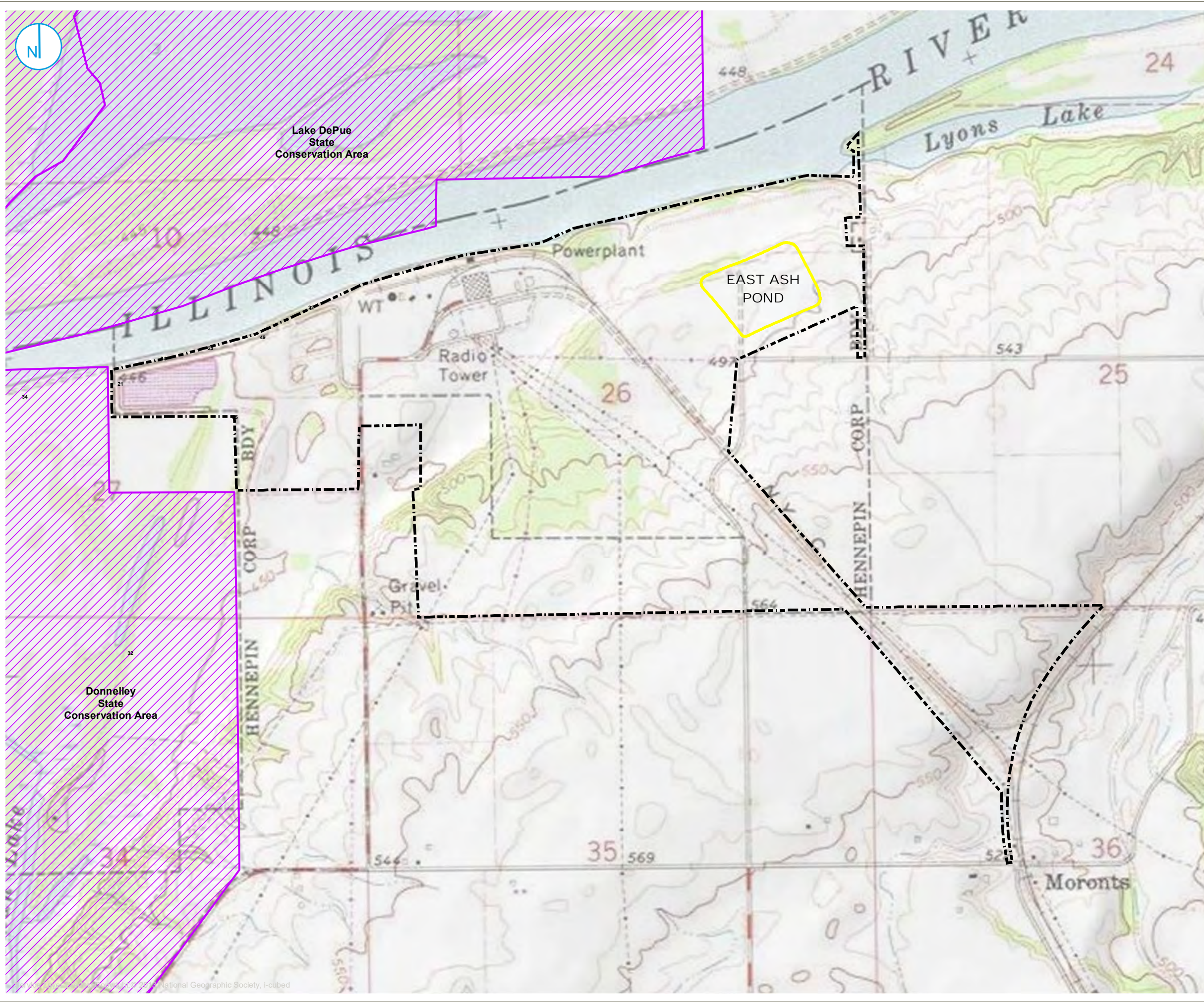
mV = millivolts




NTU = nephelometric turbidity units

SU = standard units

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FIGURES



-  PART 845 REGULATED UNIT (SUBJECT UNIT)
-  PROPERTY BOUNDARY
-  PROTECTED AREA







SITE LOCATION MAP

**HYDROGEOLOGIC SITE
CHARACTERIZATION REPORT
EAST ASH POND
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS**

FIGURE 1-1





-  PART 845 REGULATED UNIT (SUBJECT UNIT)
-  SITE FEATURE
-  LIMITS OF FINAL COVER
-  PROPERTY BOUNDARY



SITE MAP

**HYDROGEOLOGIC SITE
CHARACTERIZATION REPORT
EAST ASH POND
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS**

FIGURE 1-2

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.





- 10 FOOT ELEVATION CONTOUR
- 2 FOOT ELEVATION CONTOUR
- PART 845 REGULATED UNIT (SUBJECT UNIT)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY

NOTE:
 ELEVATION CONTOURS SHOWN IN FEET, NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88). TOPOGRAPHIC CONTOURS PROVIDED FROM AERIAL SURVEY COMPLETED BY DRAGONFLY AEROSOLUTIONS DATED 11/15/2020 AND TOPOGRAPHIC/BATHYMETRIC SURVEYS COMPLETED BY INGENAE DATED 11/2/2020 AND 11/16/2020.



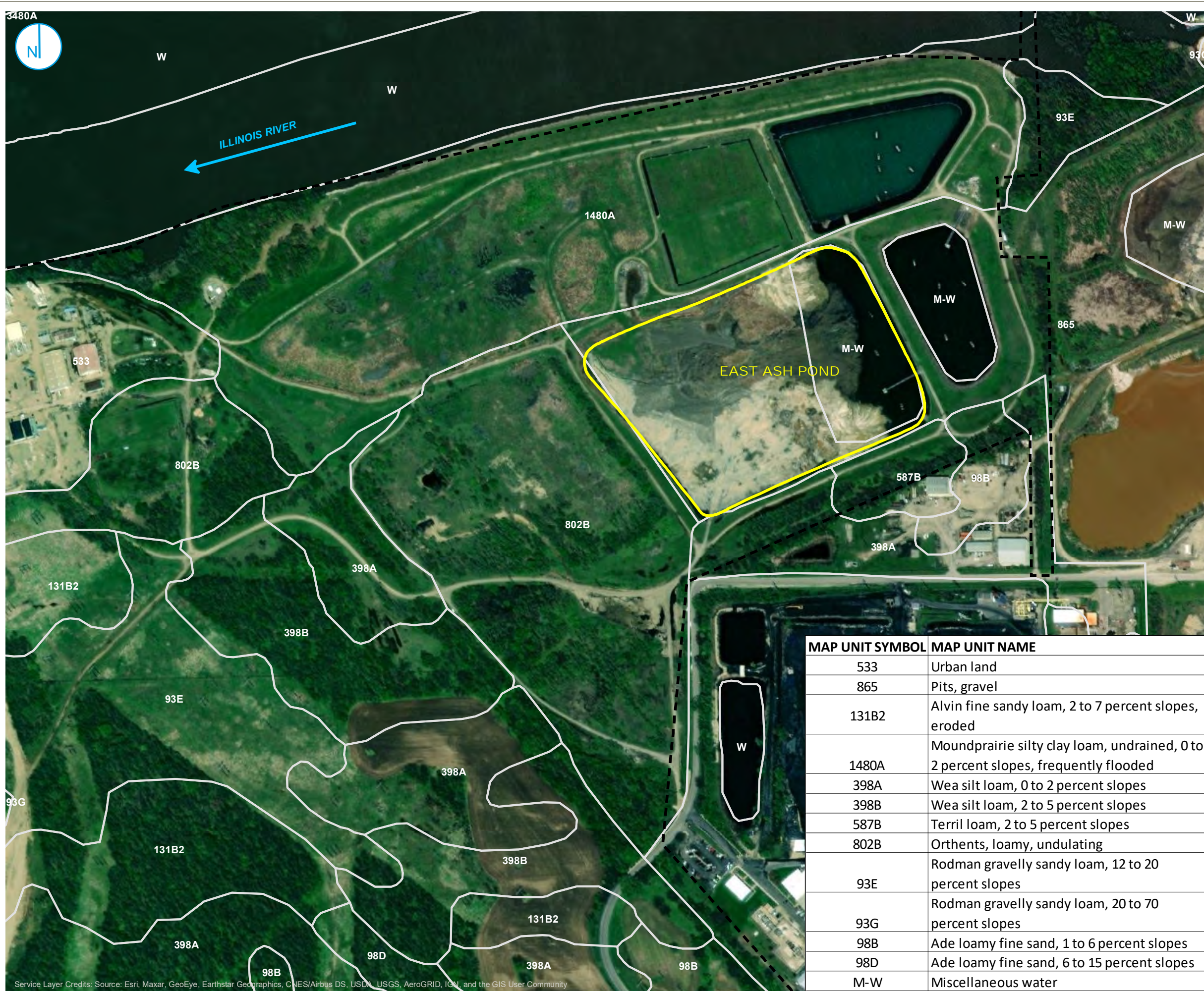
SITE TOPOGRAPHIC MAP

**HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 EAST ASH POND
 HENNEPIN POWER PLANT
 HENNEPIN, ILLINOIS**

FIGURE 2-1

RAMBOLL AMERICAS
 ENGINEERING SOLUTIONS, INC.





- PART 845 REGULATED UNIT (SUBJECT UNIT)
- PROPERTY BOUNDARY
- NRCS SOIL SURVEY MAP UNIT BOUNDARY

SOURCE:
NATURAL RESOURCES CONSERVATION
SERVICE (NRCS)



MAP UNIT SYMBOL	MAP UNIT NAME
533	Urban land
865	Pits, gravel
131B2	Alvin fine sandy loam, 2 to 7 percent slopes, eroded
1480A	Moundprairie silty clay loam, undrained, 0 to 2 percent slopes, frequently flooded
398A	Wea silt loam, 0 to 2 percent slopes
398B	Wea silt loam, 2 to 5 percent slopes
587B	Terril loam, 2 to 5 percent slopes
802B	Orthents, loamy, undulating
93E	Rodman gravelly sandy loam, 12 to 20 percent slopes
93G	Rodman gravelly sandy loam, 20 to 70 percent slopes
98B	Ade loamy fine sand, 1 to 6 percent slopes
98D	Ade loamy fine sand, 6 to 15 percent slopes
M-W	Miscellaneous water

SOIL SURVEY MAP

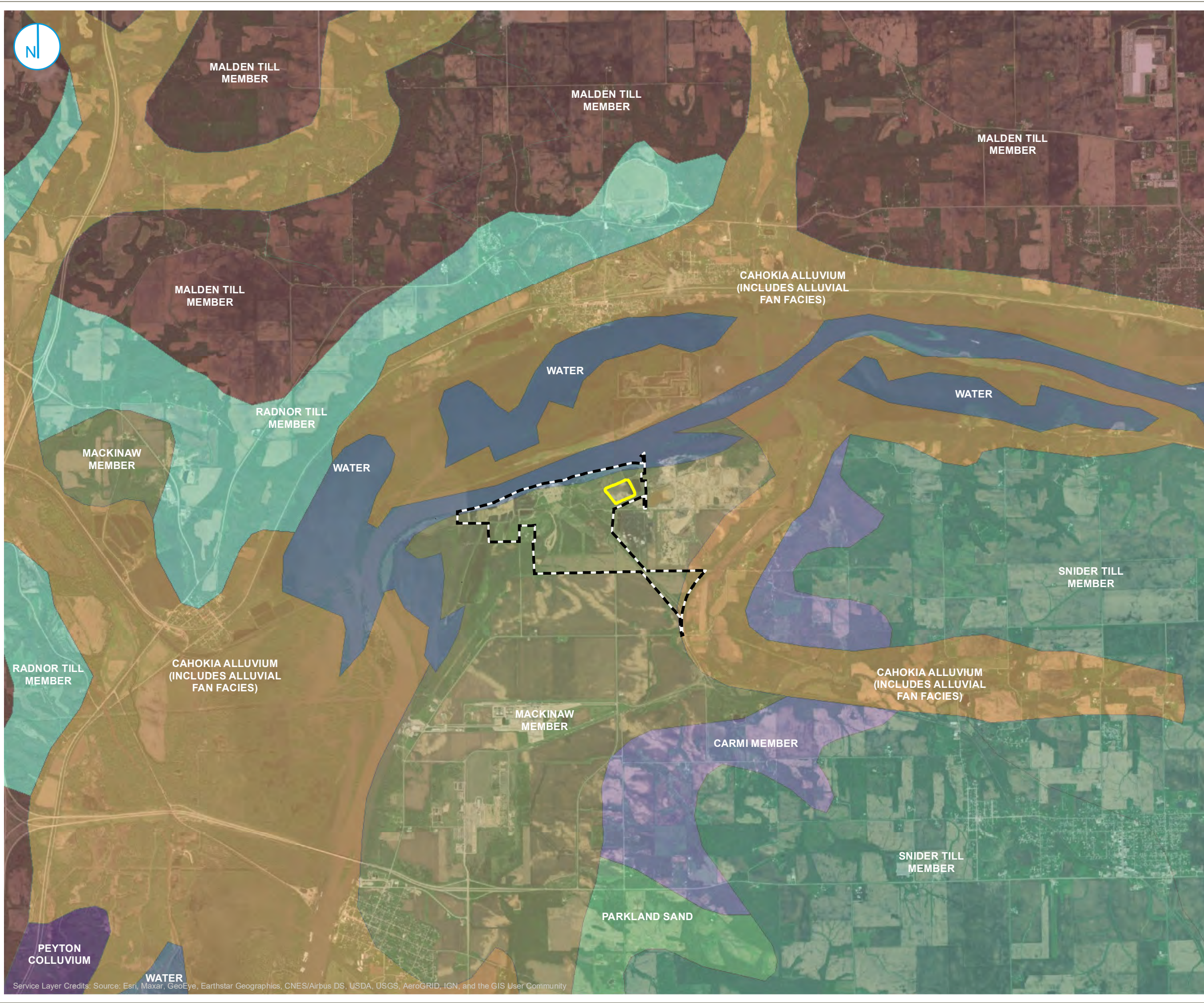
**HYDROGEOLOGIC SITE
CHARACTERIZATION REPORT
EAST ASH POND
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS**

FIGURE 2-2

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



- PART 845 REGULATED UNIT (SUBJECT UNIT)
- PROPERTY BOUNDARY
- CAHOKIA ALLUVIUM (INCLUDES ALLUVIAL FAN FACIES)
- CARMİ MEMBER
- MACKINAW MEMBER
- MALDEN TILL MEMBER
- PARKLAND SAND
- PEYTON COLLUVIUM
- RADNOR TILL MEMBER
- SNIDER TILL MEMBER
- WATER

SOURCE
ILLINOIS STATE GEOLOGICAL SURVEY (ISGS)



SURFICIAL GEOLOGIC DEPOSITS

**HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
EAST ASH POND
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS**

FIGURE 2-3

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

SYSTEM or SERIES	HYDROGEOLOGIC UNITS	GRAPHIC LOG	ROCK TYPE	WATER-YIELDING CHARACTERISTICS
PLEISTOCENE	Drift (0-300 feet)		Unconsolidated glacial deposits, loess and alluvium (drift).	Water yields variable, largest from thick basal sand and gravel deposits (Sankoty Sand) in bedrock valleys.
PENNSYLVANIAN	(280-475 feet)		Mainly shale with thin sandstone, limestone, and coal beds.	Generally unfavorable as an aquifer. Locally, domestic and farm supplies obtained from thin limestone and sandstone beds. Casing usually required.
SILURIAN	Niagaran-Alexandrian (410-505 feet)		Dolomite; argillaceous near base, lower part cherty.	Generally yields poor quality water.
ORDOVICIAN	Maquoketa (155-240 feet)		Green to blue shale with limestone and dolomite beds.	Not water yielding at most places. Casing required.
	Galena-Platteville (320-380 feet)		Dolomite, with shaly zone near the middle; some limestone in the lower part.	Not important as an aquifer, Creviced dolomite probably yields some water. Water quality good.
	Glenwood-St. Peter (115-135 feet)		Sandstone, white, clean.	Dependable source of groundwater. Water quality good.
	Shakopee (130-150 feet)		Dolomite, with some shale and sandstone.	Not important as aquifer.
	New Richmond (165 feet ±)		Sandstone, with some dolomite.	May yield some water.
	Oneota (215 feet ±)		Dolomite, with some sandstone beds.	Not important as aquifer.

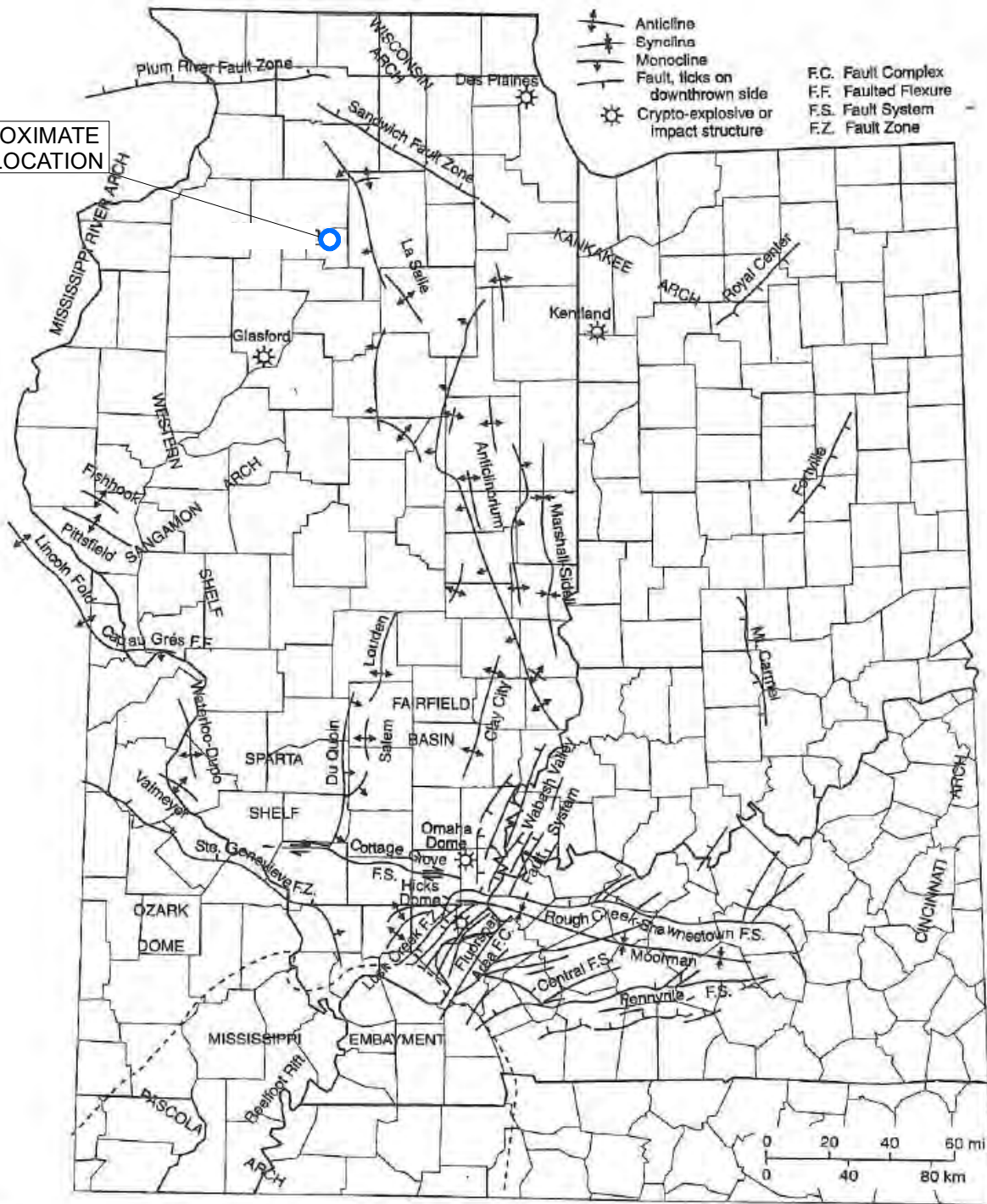
SOURCE NOTE: MODIFIED FROM "MCCOMAS, M.R. (1968), GEOLOGY RELATED TO LAND USE IN THE HENNEPIN REGION FIGURE 2, ILLINOIS STATE GEOLOGICAL SURVEY, CIRCULAR 422, CHAMPAIGN, ILLINOIS.

GENERALIZED STRATIGRAPHIC COLUMN FOR THE HENNEPIN AREA

FIGURE 2-4



APPROXIMATE SITE LOCATION



SOURCE NOTE: MODIFIED FROM "NELSON, W.J. 1995, STRUCTURAL FEATURES IN ILLINOIS, ILLINOIS STATE GEOLOGICAL SURVEY, BULLETIN 100, CHAMPAIGN, ILLINOIS."

Service Layer Credits:

MAJOR STRUCTURAL FEATURES OF ILLINOIS

FIGURE 2-5



- MONITORING WELL
- SOURCE SAMPLE LOCATION
- STAFF GAGE
- PART 845 REGULATED UNIT (SUBJECT UNIT)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY

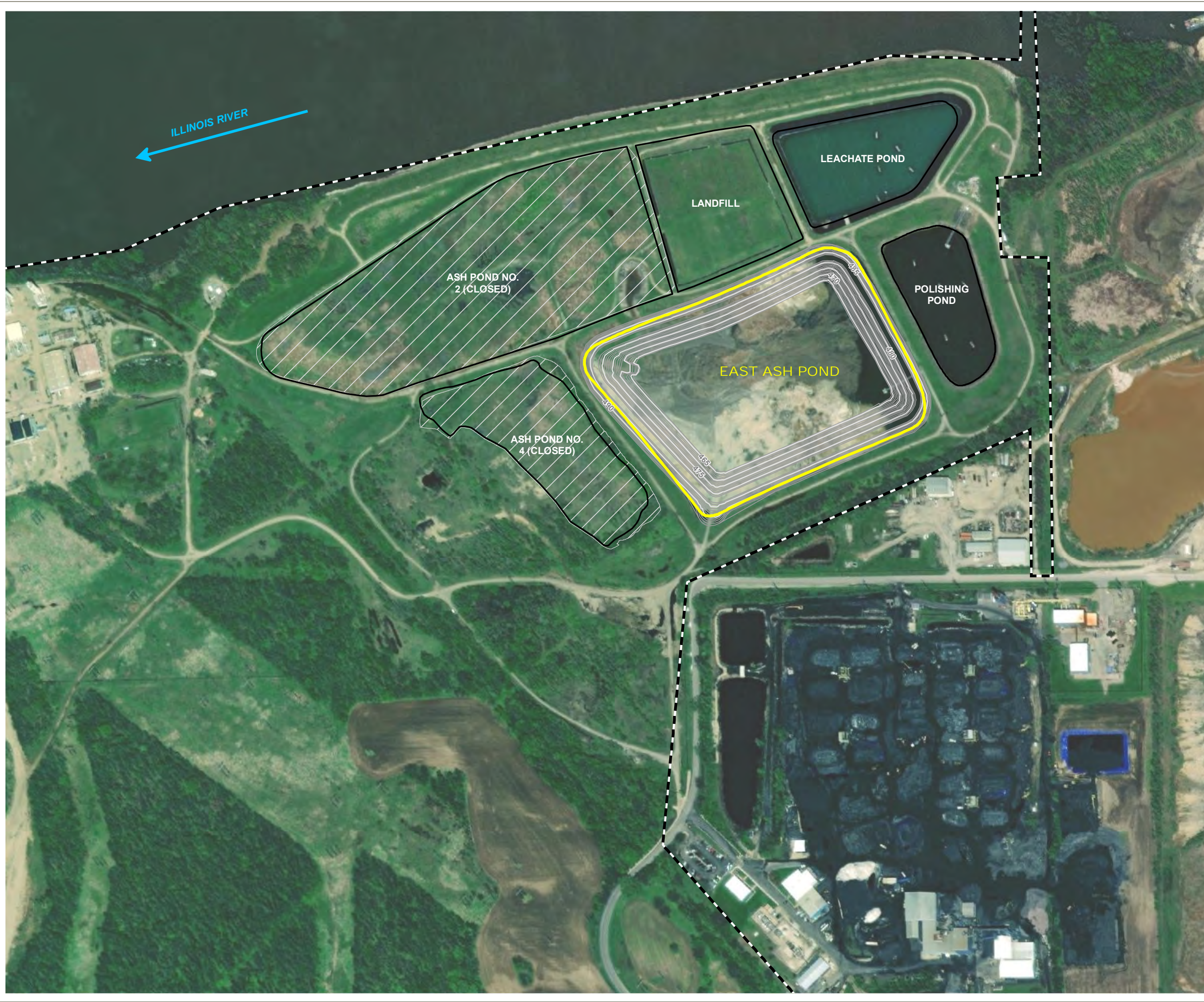


FIELD INVESTIGATION LOCATION MAP

HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 EAST ASH POND
 HENNEPIN POWER PLANT
 HENNEPIN, ILLINOIS

FIGURE 2-6





- 5 FOOT CONSTRUCTION ELEVATION CONTOUR
- 1 FOOT CONSTRUCTION ELEVATION CONTOUR
- PART 845 REGULATED UNIT (SUBJECT UNIT)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY

NOTE:
ELEVATION CONTOURS SHOWN IN FEET, NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88)



BOTTOM OF ASH

HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
EAST ASH POND
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS

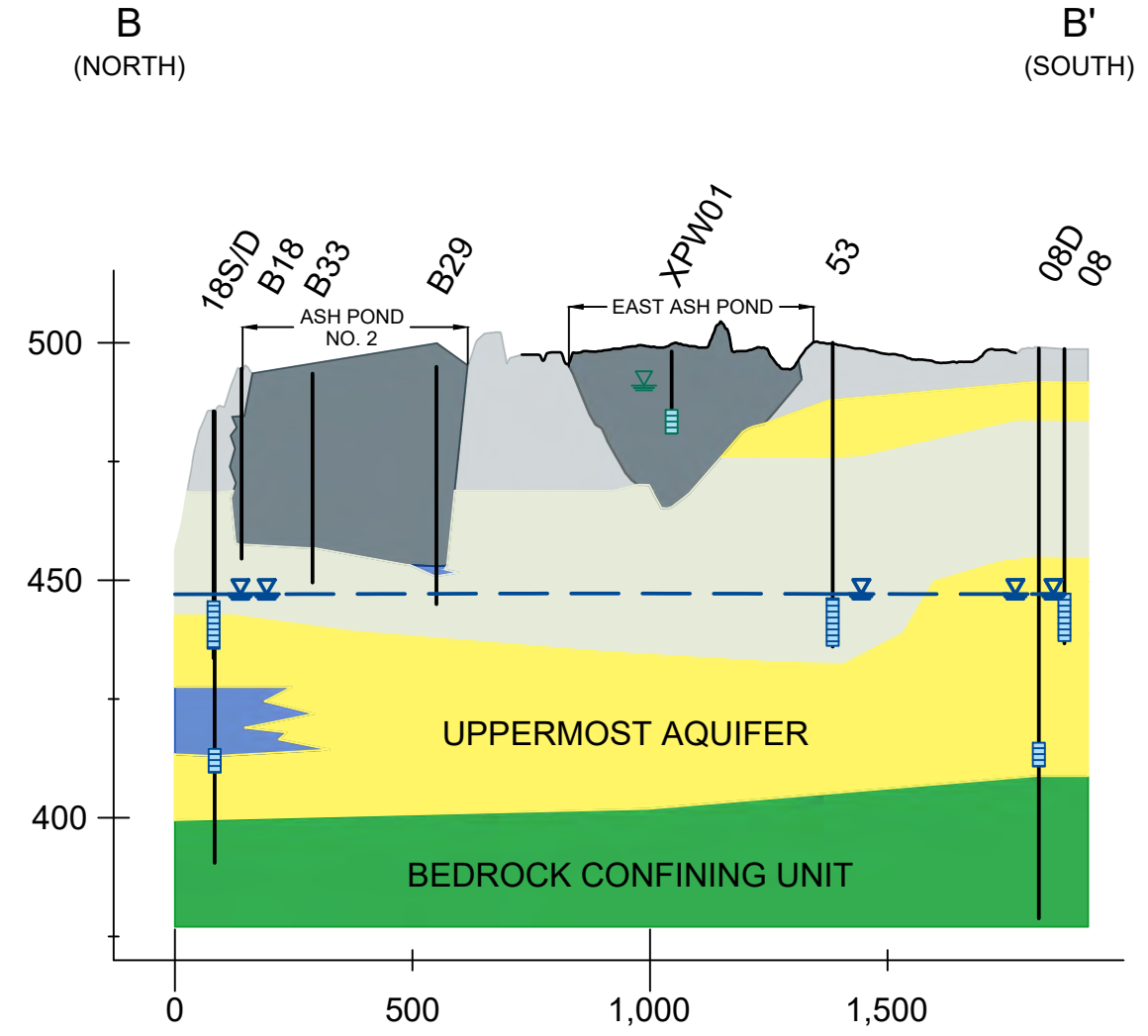
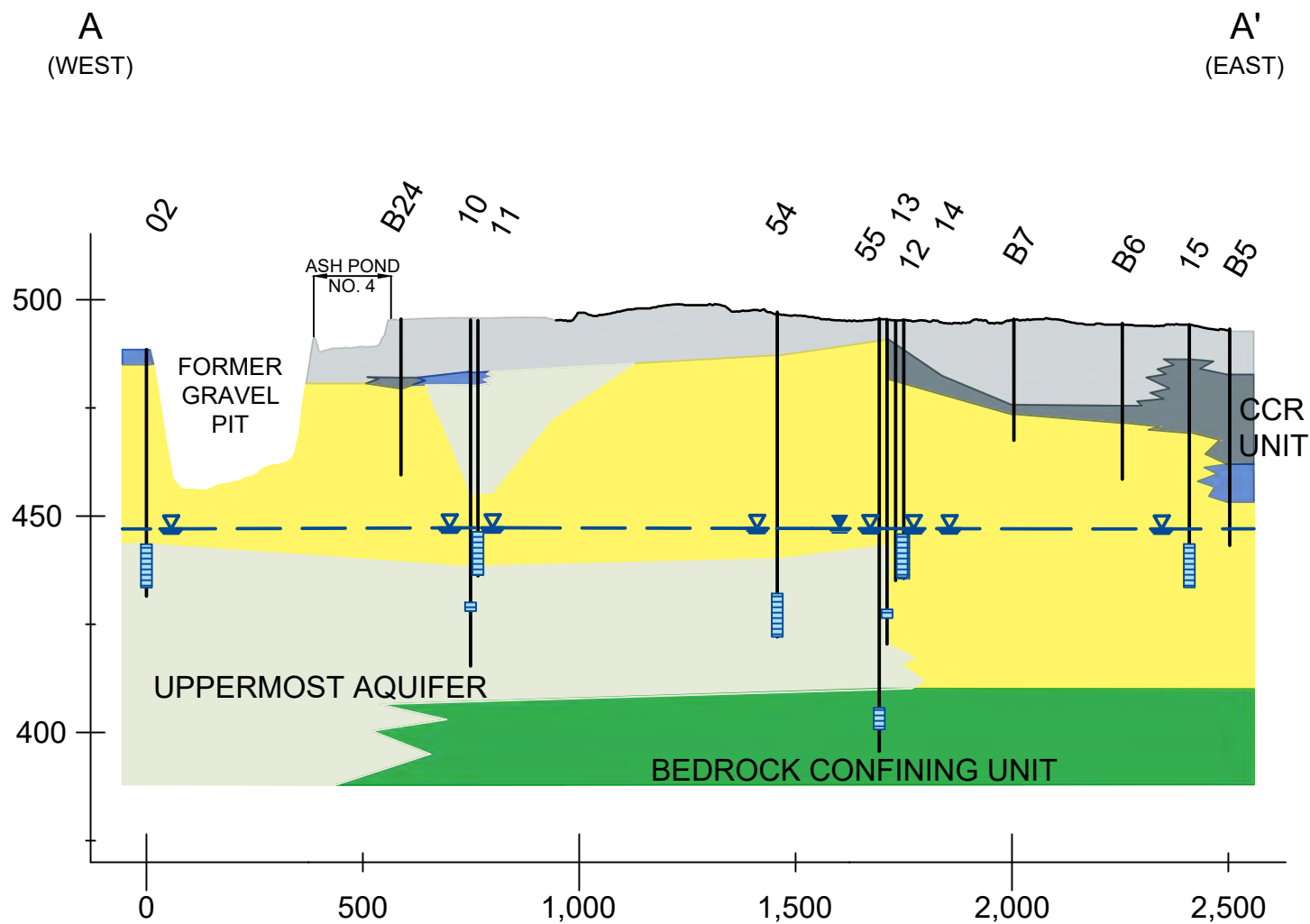
FIGURE 2-7



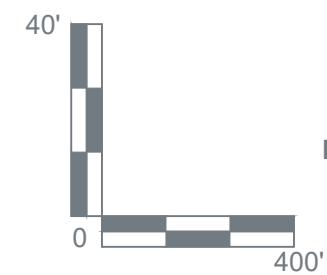
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- NOTES**
1. This profile was developed by interpolation between widely spaced boreholes. Only at the borehole location should it be considered as an approximately accurate representation and then only to the degree implied by the notes on the borehole logs.
 2. Scale is approximate.
 3. Vertical scale is exaggerated 10X.
 4. Vertical Datum: NAVD88
 5. Groundwater elevations measured March, 2021.



LEGEND	
	COAL COMBUSTION RESIDUALS, CCRs
	FILL
	SILT (ML)
	SAND AND GRAVEL WITH FINES
	SAND AND GRAVEL
	BEDROCK / WEATHERED BEDROCK (SHALE)
	WELL SCREEN INTERVAL
	UPPERMOST AQUIFER POTENTIOMETRIC SURFACE
	UPPERMOST AQUIFER GROUNDWATER ELEVATION
	POREWATER ELEVATION
	BEDROCK GROUNDWATER / OTHER GROUNDWATER / SURFACE WATER ELEVATION(S)



GEOLOGIC CROSS SECTIONS
A-A' and B-B'

HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
EAST ASH POND
 HENNEPIN POWER PLANT
 HENNEPIN, ILLINOIS

FIGURE 2-8

RAMBOLL AMERICAS
 ENGINEERING SOLUTIONS, INC.
 A RAMBOLL COMPANY





- BACKGROUND WELL
- MONITORING WELL
- SOURCE SAMPLE LOCATION
- STAFF GAGE
- PART 845 REGULATED UNIT (SUBJECT UNIT)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY



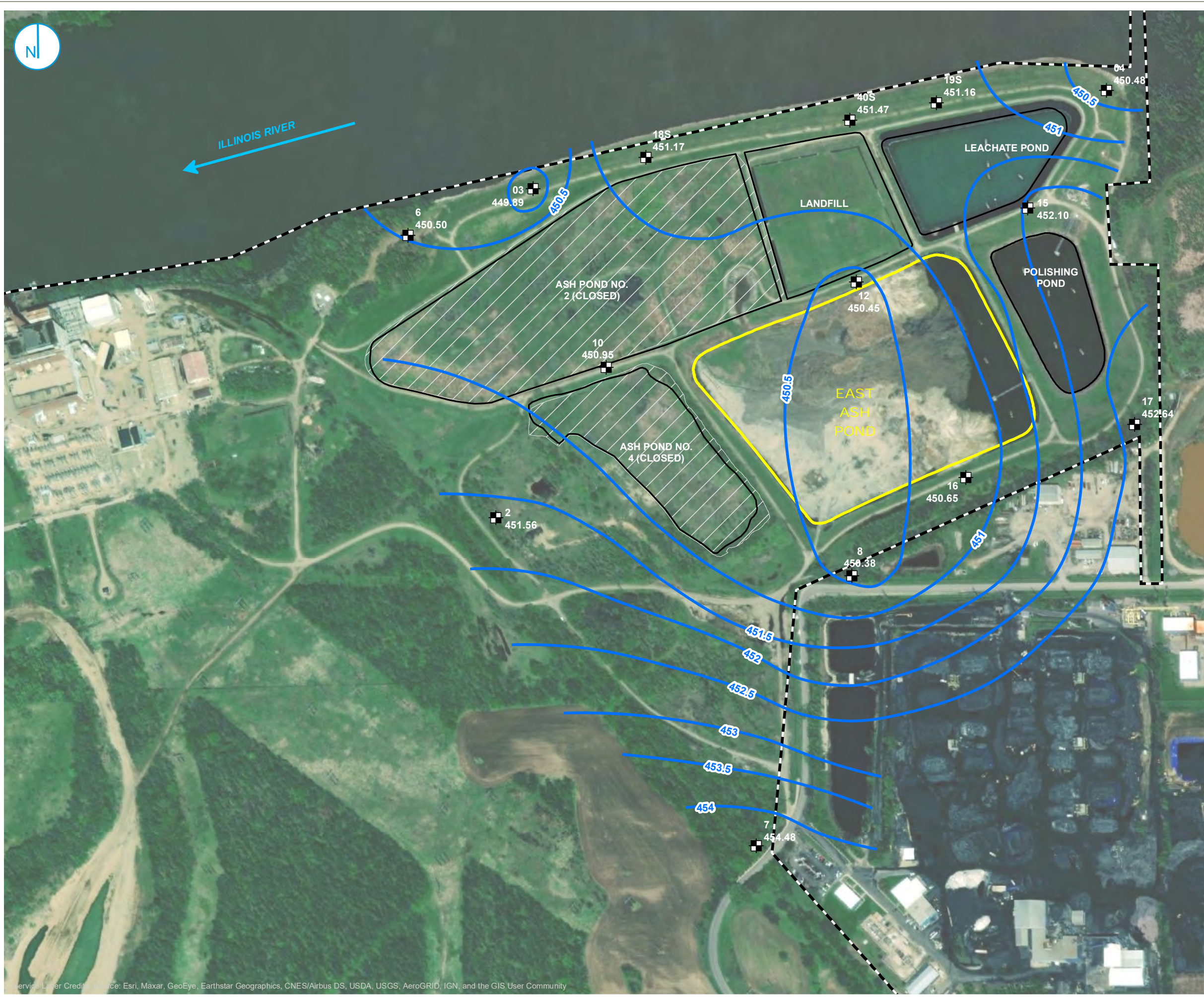
MONITORING WELL LOCATION MAP







HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 EAST ASH POND
 HENNEPIN POWER PLANT
 HENNEPIN, ILLINOIS

FIGURE 3-1



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



-  MONITORING WELL
-  INTERPRETED TOP OF UPPERMOST AQUIFER (95TH PERCENTILE GROUNDWATER ELEVATION CONTOURS, 0.5 FT INTERVAL, NAVD88)
-  PART 845 REGULATED UNIT (SUBJECT UNIT)
-  SITE FEATURE
-  LIMITS OF FINAL COVER
-  PROPERTY BOUNDARY

NOTE
 TOP OF UPPERMOST AQUIFER CONTOURS GENERATED IN 2018 FOR 40 C.F.R. § 257 AQUIFER SEPARATION DETERMINATION (HALEY & ALDRICH, 2018). CONTOURS HAVE NOT BEEN MODIFIED USING GROUNDWATER ELEVATION DATA COLLECTED IN 2021, BUT THE SEPARATION BETWEEN THE TOP OF AQUIFER AND BASE OF CCR IS CONSISTENT.



TOP OF UPPERMOST AQUIFER

**HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 EAST ASH POND
 HENNEPIN POWER PLANT
 HENNEPIN, ILLINOIS**

FIGURE 3-2

RAMBOLL AMERICAS
 ENGINEERING SOLUTIONS, INC.





- BACKGROUND WELL
- MONITORING WELL
- SOURCE SAMPLE LOCATION
- STAFF GAGE
- GROUNDWATER ELEVATION CONTOUR (1-FT CONTOUR INTERVAL, NAVD88)
- INFERRED GROUNDWATER ELEVATION CONTOUR
- GROUNDWATER FLOW DIRECTION
- PART 845 REGULATED UNIT (SUBJECT UNIT)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY

NOTE:
ELEVATIONS IN PARENTHESIS WERE NOT USED FOR CONTOURING.

0 175 350
Feet

**UPPERMOST AQUIFER
GROUNDWATER ELEVATION
CONTOURS
FEBRUARY 24-26, 2021**

**HYDROGEOLOGIC SITE
CHARACTERIZATION REPORT
EAST ASH POND
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS**

FIGURE 3-3





- BACKGROUND WELL
- MONITORING WELL
- SOURCE SAMPLE LOCATION
- STAFF GAGE
- GROUNDWATER ELEVATION CONTOUR (0.5 FT CONTOUR INTERVAL, NAVD88)
- INFERRED GROUNDWATER ELEVATION CONTOUR
- GROUNDWATER FLOW ARROW
- PART 845 REGULATED UNIT (SUBJECT UNIT)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY

NOTE:
ELEVATIONS IN PARENTHESIS WERE NOT USED FOR CONTOURING.

0 175 350
Feet

**UPPERMOST AQUIFER
GROUNDWATER ELEVATION
CONTOURS
MARCH 17-19 AND 22, 2021**

**HYDROGEOLOGIC SITE
CHARACTERIZATION REPORT
EAST ASH POND
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS**

FIGURE 3-4



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



- BACKGROUND WELL
- MONITORING WELL
- SOURCE SAMPLE LOCATION
- STAFF GAGE
- GROUNDWATER ELEVATION CONTOUR (1-FT CONTOUR INTERVAL, NAVD88)
- INFERRED GROUNDWATER ELEVATION CONTOUR
- GROUNDWATER FLOW DIRECTION
- PART 845 REGULATED UNIT (SUBJECT UNIT)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY

NOTE:
 ELEVATIONS IN PARENTHESIS WERE NOT USED FOR CONTOURING.

0 175 350
 Feet

**UPPERMOST AQUIFER
 GROUNDWATER ELEVATION
 CONTOURS
 APRIL 7, 2021**

**HYDROGEOLOGIC SITE
 CHARACTERIZATION REPORT
 EAST ASH POND
 HENNEPIN POWER PLANT
 HENNEPIN, ILLINOIS**

FIGURE 3-5



APPENDICES

**APPENDIX A
BORING LOGS AND WELL CONSTRUCTION LOGS**

**APPENDIX A
BORING LOGS AND WELL CONSTRUCTION LOGS
GEOSYNTEC BORING LOGS**



Client: **Dynegy**
 Project: **GLP8020, Hennepin East Ash Pond**
 Address: **13498 E 800th, Hennepin, IL**

BORING LOG
 Boring No. **MW52**
 Page: **1 of 4**

Drilling Start Date: 02/11/2021	Boring Depth (ft): 61
Drilling End Date: 02/11/2021	Boring Diameter (in): 6
Drilling Company: Cascade Drilling	Sampling Method(s): Direct Push
Drilling Method: Sonic	DTW During Drilling (ft):
Drilling Equipment:	DTW After Drilling (ft):
Driller: Jason Green	Ground Surface Elev. (ft): 497.74
Logged By: Will Blocher	Location (Lat, Long): 41.3024578, -89.3063692

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE Lab Sample	DEPTH (ft)
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)			
0				DP	48/60			(0') GRAVELLY LEAN CLAY WITH SAND (CL); dense, somewhat cohesive, dark brown (10YR 4/3).		0
3.25								(3.25') SANDY LEAN CLAY (CL); dark brown (10YR 4/3), medium consistency, medium plasticity, moist.		
3.75								(3.75') Same as above: except darker (10YR 3/2).	4-8 Geotech Sample 1	
5				DP	42/60			(5') LEAN CLAY WITH SAND (CL); trace gravel, stiff, medium plasticity, very dark (10YR 2/1).		5
8.5								(8.5') 1" Sandy interbed.		
10								(10') Same as above: some gravel, lighter (10YR 3/2).		10
15								(15') SANDY SILT (ML); with some gravel, loose, dry, pale yellowish tan (10YR 6/2), color lightens downward to (10YR 7/2).		15
20										20

NOTES: Sample 1: 21.4% moisture content, 8080 mg/kg total organic carbon, 95.0 pcf dry unit weight, 2.675 specific gravity, 7.1x10⁻⁸ cm/s vertical hydraulic conductivity, 32 LL, 17 PL, 15 PI, 0.7% gravel, 21.0% sand, 78.3% fines.

Drilling Start Date: 02/11/2021	Boring Depth (ft): 61
Drilling End Date: 02/11/2021	Boring Diameter (in): 6
Drilling Company: Cascade Drilling	Sampling Method(s): Direct Push
Drilling Method: Sonic	DTW During Drilling (ft):
Drilling Equipment:	DTW After Drilling (ft):
Driller: Jason Green	Ground Surface Elev. (ft): 497.74
Logged By: Will Blocher	Location (Lat, Long): 41.3024578, -89.3063692

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE	DEPTH (ft)
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)			
20										20
24.5				DP	66/120			(24.5') LEAN CLAY WITH SAND (CL); moist, medium consistency, medium plasticity, dark (10YR 2/2).		25
25								(25') SILTY SAND WITH GRAVEL (SM); loose, dry, dull red (10YR 4/4).		
27.5								(27.5') WELL-GRADED SAND WITH SILT AND GRAVEL (SM); loose, dry, grayish tan (10YR 6/3).		
30				DP	96/120			(32') LEAN CLAY WITH SAND AND GRAVEL (CL); stiff, medium plasticity, dark brown (10YR 5/2).		30
33								(33') SANDY SILT WITH GRAVEL (ML); loose, dry, light dull red (10YR 5/4).		
38.5								(38.5') <1" clay interbed.		35
40								Begin drilling with water.		40

NOTES:



Client: **Dynegy**
 Project: **GLP8020, Hennepin East Ash Pond**
 Address: **13498 E 800th, Hennepin, IL**

BORING LOG
 Boring No. **MW52**
 Page: **3 of 4**

Drilling Start Date: 02/11/2021	Boring Depth (ft): 61
Drilling End Date: 02/11/2021	Boring Diameter (in): 6
Drilling Company: Cascade Drilling	Sampling Method(s): Direct Push
Drilling Method: Sonic	DTW During Drilling (ft):
Drilling Equipment:	DTW After Drilling (ft):
Driller: Jason Green	Ground Surface Elev. (ft): 497.74
Logged By: Will Blocher	Location (Lat, Long): 41.3024578, -89.3063692

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE	DEPTH (ft)			
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)		Lab Sample				
40			DP	96/		5		(40') WELL-GRADED SILTY GRAVEL WITH SAND (GM); pebble to cobble, loose, moist, light dull red (10YR 5/4).		40			
45		120											
50		24/		5									
55			DP	132	5	5		(48.5-49.5') Lighter colored interval (10YR 7/3).	49-50 Geotech (not tested)	50			
60					4	5		(59') WELL-GRADED GRAVEL (GW); wet, fines likely removed in drilling.		60			

NOTES:





Client: **Dynegy**
 Project: **GLP8020, Hennepin East Ash Pond**
 Address: **13498 E 800th, Hennepin, IL**

BORING LOG
 Boring No. **MW52**
 Page: **4 of 4**

Drilling Start Date: 02/11/2021	Boring Depth (ft): 61
Drilling End Date: 02/11/2021	Boring Diameter (in): 6
Drilling Company: Cascade Drilling	Sampling Method(s): Direct Push
Drilling Method: Sonic	DTW During Drilling (ft):
Drilling Equipment:	DTW After Drilling (ft):
Driller: Jason Green	Ground Surface Elev. (ft): 497.74
Logged By: Will Blocher	Location (Lat, Long): 41.3024578, -89.3063692

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE	DEPTH (ft)
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)		Lab Sample	

60								(61') End of Boring.		60
65										65

NOTES:

Drilling Start Date: 01/12/2021	Boring Depth (ft): 64
Drilling End Date: 01/12/2021	Boring Diameter (in): 10
Drilling Company: Geotechnology	Sampling Method(s): Split Spoon & Shelby Tube
Drilling Method: Hollow Stem Auger	DTW During Drilling (ft):
Drilling Equipment: CME 55	DTW After Drilling (ft):
Driller:	Ground Surface Elev. (ft): 500.01
Logged By: D. Mateas	Location (Lat, Long): 41.3016855, -89.3055835

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE Lab Sample	DEPTH (ft)
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)			
0				SS	19/24	1	16	(0.0') CLAYEY SILT (ML); dark yellowish brown (10YR 3/4), low plasticity, some clay, trace roots, trace sand, very stiff, dry. (1') As above: some large angular gravel.		0
				SH	8/8	7	26	(2') GRAVELLY SILT (ML); dark yellowish brown (10YR 3/4), non-plastic, cohesive, some coarse subangular gravel, few clay, few sand, very stiff, dry.	2-4 ST	
				SS	7/16	8	16	(4') SILTY LEAN CLAY (CL); dark yellowish brown (10YR 3/4), low plasticity, cohesive, little to some silt, trace sand, very stiff, moist.	2-6 Geotech Sample 1	5
5				SS	11/24	8	16	(6') No Recovery.		
				SS	0/24	8	14	(8') SILTY LEAN CLAY (CL); very dark brown (10YR 2/2); low plasticity, cohesive, little to some silt, trace fine gravel, stiff, moist.	8-10 Chem	
				SS	22/24	5	12	(10.9') As above: few to little sand.		10
10				SS	14/24	2	14	(12') CLAYEY SAND (SC); very dark brown (10YR 2/2), non-plastic, cohesive, fine grained, poorly-graded, few silt, little clay, medium dense, moist.		
				SS	14/24	3	11	(14') POORLY-GRADED SAND (SP); very dark brown (10YR 2/2), slightly cohesive, fine grained, few to little silt, trace fine angular gravel, medium dense, moist.		15
15				SS	22/24	2	11	(16') CLAYEY SILT (ML); very dark brown (10YR 2/2), cohesive, little to some clay, few sand, non-plastic, stiff, moist.		
				SS	17/24	4	9	(18') As above: dark yellowish brown (10YR 3/6)		20
				SS	16/24	2	10			

NOTES: Berm fill to 24 ft bgs. Sand/gravel from 24 to 65 ft bgs. Split spoon sampler advanced to 64 ft bgs. Auger advanced to 63.78 ft bgs Sample 1: 13.7% moisture content, 11600 mg/kg total organic carbon, 120.0 pcf dry unit weight, 2.680 specific gravity, 2.4×10^{-8} cm/s vertical hydraulic conductivity, 29 LL, 16 PL, 13 PI, 9.6% gravel, 39.3% sand, 51.1% fines.

Drilling Start Date: 01/12/2021	Boring Depth (ft): 64
Drilling End Date: 01/12/2021	Boring Diameter (in): 10
Drilling Company: Geotechnology	Sampling Method(s): Split Spoon & Shelby Tube
Drilling Method: Hollow Stem Auger	DTW During Drilling (ft):
Drilling Equipment: CME 55	DTW After Drilling (ft):
Driller:	Ground Surface Elev. (ft): 500.01
Logged By: D. Mateas	Location (Lat, Long): 41.3016855, -89.3055835

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE Lab Sample	DEPTH (ft)
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)			
20				SS	16/24	3	13	(20') SANDY LEAN CLAY (CL); dark yellowish brown (10YR 3/6), low plasticity, cohesive, little fine to medium sand, few silt, trace coarse rounded gravel, stiff, moist.		20
				SS	0/24	16	28	(22') No Recovery.		
25				SS	14/24	16	66	(24') WELL-GRADED GRAVEL (GW); very pale brown (10YR 8/2) with some dark yellowish brown (10YR 4/6), well-graded sand, very dense, moist.		25
				SS	16/24	17	43	(26') GRAVELLY WELL-GRADED SAND (SW); yellowish brown (10YR 5/8); fine to coarse grained, some fine to coarse subangular to subrounded gravel (10YR 8/2), dense, moist.		
				SS	17/24	15	48	(28') As above.		
30				SS	17/24	14	44	(30') As above.		30
				SS	16/24	10	22	(32') As above: medium dense. (32.3-33') As above: little clay.		
				SS	16/24	12	22	(34.9-35.0') As above: trace clay.		
35				SS	16/24	24	41	(36') As above: dense.		35
				SS	13/24	8	13	(38') As above: medium dense, some light greenish gray (GLEYS 7/1) gravel.		
40						6				40



NOTES: Berm fill to 24 ft bgs.
Sand/gravel from 24 to 65 ft bgs.
Split spoon sampler advanced to 64 ft bgs. Auger advanced to 63.78 ft bgs.

Drilling Start Date: 01/12/2021	Boring Depth (ft): 64
Drilling End Date: 01/12/2021	Boring Diameter (in): 10
Drilling Company: Geotechnology	Sampling Method(s): Split Spoon & Shelby Tube
Drilling Method: Hollow Stem Auger	DTW During Drilling (ft):
Drilling Equipment: CME 55	DTW After Drilling (ft):
Driller:	Ground Surface Elev. (ft): 500.01
Logged By: D. Mateas	Location (Lat, Long): 41.3016855, -89.3055835

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE	DEPTH (ft)				
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)				Lab Sample			
40			SS	13/24	4	12	(40') GRAVELLY WELL-GRADED SAND (SW); strong brown (7.5YR 5/6), fine to coarse grained, some fine to coarse subangular to subrounded gravel, trace clay, medium dense, wet.			40				
4														
8														
7														
15						SS	10/24			6	15	(42') SANDY WELL-GRADED GRAVEL (GW); yellowish brown (10YR 5/8) and light greenish gray (GLY 7/1), fine to coarse (up to 2" diameter), some sand, trace clay, medium dense, moist.		
7														
8														
6														
45						SS	6/24			4	11	(44') As above.		
4														
7														
14														
28			SS	12/24	21	28	(46') GRAVELLY WELL-GRADED SAND (SW); yellowish brown (10YR 5/8), fine to coarse grained, some fine to coarse subangular to subrounded gravel, trace to few clay, medium dense, moist.							
8														
7														
12			SS	10/24	4	12	(48') As above: wet.							
5														
7														
10														
50			SS	8/24	7	11	(50') SANDY WELL-GRADED GRAVEL (GW); yellowish brown (10YR 5/8), fine to coarse (up to 2" diameter), some sand, trace clay, medium dense, wet.	50-54 Chem	50					
6														
5														
8														
12			SS	11/24	5	12	(52') As above: no clay.							
6														
6														
7														
55			SH	8/13				54-56 ST	55					
4														
5														
6														
7														
11			SS	9/24	4	11	(56') WELL-GRADED SAND (SW); yellowish brown (10YR 5/8); medium to coarse grained, little coarse subrounded gravel (up to 1" diameter), medium dense, wet.	56-58 Geotech Sample 2						
5														
6														
7														
9			SS	4/24	3	9	(58') WELL-GRADED GRAVEL (GW); yellowish brown (10YR 5/8), coarse grained, subrounded, some very coarse grained sand, loose, wet.							
3														
3														
6														
4														
60									60					

NOTES: Berm fill to 24 ft bgs. Sand/gravel from 24 to 65 ft bgs. Split spoon sampler advanced to 64 ft bgs. Auger advanced to 63.78 ft bgs.
Sample 2: 9.9% moisture content, 8580 mg/kg total organic carbon, 48.9% gravel, 42.8% sand, 8.3% fines.

Drilling Start Date: 01/12/2021	Boring Depth (ft): 64
Drilling End Date: 01/12/2021	Boring Diameter (in): 10
Drilling Company: Geotechnology	Sampling Method(s): Split Spoon & Shelby Tube
Drilling Method: Hollow Stem Auger	DTW During Drilling (ft):
Drilling Equipment: CME 55	DTW After Drilling (ft):
Driller:	Ground Surface Elev. (ft): 500.01
Logged By: D. Mateas	Location (Lat, Long): 41.3016855, -89.3055835

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE	DEPTH (ft)
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)		Lab Sample	
60				SS	6/24	4	12	(60') As above.		60
				SS	4/24	5	14			
65								(64') End of Boring.		65

NOTES: Berm fill to 24 ft bgs.
Sand/gravel from 24 to 65 ft bgs.
Split spoon sampler advanced to 64 ft bgs. Auger advanced to 63.78 ft bgs.



Client: **Dynegy**
 Project: **GLP8020, Hennepin East Ash Pond**
 Address: **13498 E 800th, Hennepin, IL**

BORING LOG
 Boring No. **MW54**
 Page: **1 of 4**

Drilling Start Date: 02/08/2021	Boring Depth (ft): 75
Drilling End Date: 02/09/2021	Boring Diameter (in): 6
Drilling Company: Cascade Drilling	Sampling Method(s): Direct Push
Drilling Method: Sonic	DTW During Drilling (ft):
Drilling Equipment:	DTW After Drilling (ft):
Driller: Jason Green	Ground Surface Elev. (ft): 497.14
Logged By: SWB	Location (Lat, Long): 41.3034315, -89.3052197

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE Lab Sample	DEPTH (ft)
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)			
0				DP	60/60			(0') SANDY LEAN CLAY (CL); little gravel, stiff, dark brown (10YR 3/2), low plasticity, non-cohesive, moist.		0
5				DP	60/60			(5') SILTY SAND WITH GRAVEL (SM); medium dense, reddish brown (5Y 4/6), moist, non-plastic, non-cohesive.		5
7.9								(7.9') SANDY LEAN CLAY (CL); trace gravel, stiff, mottled reddish brown (5Y 4/6), gray (2.5Y 4/1).		7.9
10				SH	20/24	6		(10') FAT CLAY WITH SAND (CH); trace gravel, medium dark brown (5Y 3/1), moist, high plasticity.	10-12 Geotech (not tested) & Chem	10
12				DP	60/96	4		(12') As above: few gravel (large).		12
15						5				15
17						5		(17') As above: gradational color change to darker brown (10YR 2/1).		17
20										20

NOTES:

Drilling Start Date: 02/08/2021	Boring Depth (ft): 75
Drilling End Date: 02/09/2021	Boring Diameter (in): 6
Drilling Company: Cascade Drilling	Sampling Method(s): Direct Push
Drilling Method: Sonic	DTW During Drilling (ft):
Drilling Equipment:	DTW After Drilling (ft):
Driller: Jason Green	Ground Surface Elev. (ft): 497.14
Logged By: SWB	Location (Lat, Long): 41.3034315, -89.3052197

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE Lab Sample	DEPTH (ft)
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)			
20				DP	90/120			(20') As above: trace gravel.		20
25								(24.5') SILTY SAND WITH GRAVEL (SM); very loose, pale yellow tan (10YR 6/3), dry, non-cohesive. (25.5') As above: color change to white (10YR 7/1). (25.8') As above: color change to yellow (10YR 6/4), color is mottled, few to some gravel.		25
30				DP	91/120			(30') No Recovery.		30
35								(32.5') FAT CLAY WITH SAND (CH); medium stiff, very dark brown (10YR 3/1), trace gravel, cohesive, moist, medium plasticity. (possible slough)		35
								(35') WELL-GRADED SILTY SAND (SM); few gravel, non-cohesive, very loose, light tan (10YR 7/2), dry.		
								(37.6') GRAVELLY FAT CLAY WITH SAND (CH); medium stiff, dark brown (10YR 3/2), dry to moist, medium plasticity.		
40								(38.6') SILTY SAND WITH GRAVEL (SM); loose, tan (10YR 6/3), dry.		40

NOTES:

Drilling Start Date: 02/08/2021	Boring Depth (ft): 75
Drilling End Date: 02/09/2021	Boring Diameter (in): 6
Drilling Company: Cascade Drilling	Sampling Method(s): Direct Push
Drilling Method: Sonic	DTW During Drilling (ft):
Drilling Equipment:	DTW After Drilling (ft):
Driller: Jason Green	Ground Surface Elev. (ft): 497.14
Logged By: SWB	Location (Lat, Long): 41.3034315, -89.3052197

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE	
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)		Lab Sample	DEPTH (ft)
40				DP	108/120			(40') No Recovery.		40
								(41') LEAN CLAY WITH GRAVEL (CL); medium stiff, dark gray (10YR 3/1), dry to moist, medium plasticity, cohesive. (possible slough)		
								(42.25') SILTY GRAVEL WITH SAND (GM); loose, dark yellowish tan (10YR 5/3), dry.		
45								(48') As above: wet.		45
								(49.3') As above: dry, with siltstone (compacted silt).		
50				SH	12/24	10 8 9 9		(50') As above: wet, no silt rock.		50
				DP	78/120			(52') No Recovery.		
55								(53.5') CLAYEY GRAVEL WITH SAND (GC); medium dense, yellowish brown (10YR 4/3), moist, cohesive, clay matrix.	53.5-54.5 Chem	55
									54.5-56 Geotech (not tested)	
60								(57') WELL-GRADED GRAVEL WITH CLAY AND SAND (GW-GC); gradational contact (1ft), increased sand and decreased clay content, still moist to dry, no color change.		60

NOTES:

Drilling Start Date: 02/08/2021	Boring Depth (ft): 75
Drilling End Date: 02/09/2021	Boring Diameter (in): 6
Drilling Company: Cascade Drilling	Sampling Method(s): Direct Push
Drilling Method: Sonic	DTW During Drilling (ft):
Drilling Equipment:	DTW After Drilling (ft):
Driller: Jason Green	Ground Surface Elev. (ft): 497.14
Logged By: SWB	Location (Lat, Long): 41.3034315, -89.3052197

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE Lab Sample	DEPTH (ft)
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)			
60				DP	108/ 120			(61') WELL-GRADED GRAVEL WITH SAND AND CLAY (GW-GC); loose, pale yellowish brown (10Y 5/4), wet.		60
75								(75') End of Boring.		75
80										80

NOTES:



Line: ty Dg: eJg
 Project: W8P0121, He: : epi: East Ash PG d
 Address: 63490 E 011th, He: : epi: , l8

j ORINW8OW
 j Gri: J NG MB 55
 PoJey 6 Cf 5

Drilling Start Date: 12/61/2126	Boring Depth (ft): 611
Drilling End Date: 12/61/2126	Boring Diameter (in): C
Drilling Company: I oscode Drini: J	Sampling Method(s): Direct Push
Drilling Method: SG ic	DTW During Drilling (ft):
Drilling Equipment:	DTW After Drilling (ft):
Driller: aosG Wree:	Ground Surface Elev. (ft): 495.65
Logged By: B imj rGcher	Location (Lat, Long): 41.303651, -89.3043529

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE	DEPTH (ft)
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)			
0				DP	60/60			(0') CLAYEY SAND WITH GRAVEL (SC); yellowish brown (10YR 4/4), medium dense, clay matrix, cohesive, medium plasticity, moist.		0
5				DP	78/120			(5') SANDY LEAN CLAY WITH GRAVEL (CL); yellowish brown (10YR 4/4), medium consistency, medium plasticity, cohesive, moist.	8-10 Chem	5
10								(10') As above: darker color (10YR 2/2).		10
15				DP	56/60	17	11			15
						7				
						4				
								(18.3') Thin (<1") interval of grayish green silt.	15-17.5 ST Sample 1	
20								(19') WELL-GRADED GRAVEL WITH CLAY AND SAND (GW); yellowish tan (10YR 4/2), dry, loose, non-cohesive.		20

NOTES: Sample 1: 14.4% moisture content, 9800 mg/kg total organic carbon, 109.0 pcf dry unit weight, 2.720 specific gravity, 1.5x10⁻⁷ cm/s vertical hydraulic conductivity, 32 LL, 19 PL, 13 PI, 12.4% gravel, 39.6% sand, 48.0% fines.

Drilling Start Date: 12/61/2126	Boring Depth (ft): 611
Drilling End Date: 12/61/2126	Boring Diameter (in): C
Drilling Company: I oscode Drini: J	Sampling Method(s): Direct Push
Drilling Method: SG ic	DTW During Drilling (ft):
Drilling Equipment:	DTW After Drilling (ft):
Driller: aosG Wree:	Ground Surface Elev. (ft): 495.65
Logged By: B imj rGcher	Location (Lat, Long): 41.303651, -89.3043529

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE Lab Sample	DEPTH (ft)
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)			
20			DP	94/120					20	
25							(24.5') As above: with more clay, red (2.5YR 3/6). (25.5') As above: less clay, yellowish tan (10YR 4/2).		25	
30							(28.75') As above: little clay, pale yellow (5YR 10/2). (30') SANDY LEAN CLAY WITH GRAVEL (CL); moist, dark yellowish brown (10YR 2/2), medium consistency, medium plasticity.		30	
35							(32.5') WELL-GRADED GRAVEL WITH CLAY AND SAND (GW); reddish yellowish brown (7.5YR 3/3), dry, loose, non-cohesive.		35	
40							(37') LEAN CLAY WITH SAND AND GRAVEL (CL); clay-rich interval, low plasticity, stiff.		40	


NOTES:



Line: ty Dg: eJg
 Project: W8P0121, He: : epi: East Ash PG d
 Address: 63490 E 011th, He: : epi: , l8

j ORINW8OW
 j Gri: J NG MB 55
 PoJey 3 Cf 5

Drilling Start Date: 12/61/2126	Boring Depth (ft): 611
Drilling End Date: 12/61/2126	Boring Diameter (in): C
Drilling Company: I oscode Drimi: J	Sampling Method(s): Direct Push
Drilling Method: SG ic	DTW During Drilling (ft):
Drilling Equipment:	DTW After Drilling (ft):
Driller: aosG Wree:	Ground Surface Elev. (ft): 495.65
Logged By: B imj rGcher	Location (Lat, Long): 41.303651, -89.3043529

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE Lab Sample	DEPTH (ft)	
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)				
40			DP	96/120			(40') WELL-GRADED GRAVEL WITH CLAY AND SAND (GW); reddish yellowish brown (7.5YR 3/3), dry, loose, non-cohesive. Short, clay-rich interval at top of recovered core.		40		
50		DP		102/120	2	8	5	(51') LEAN CLAY WITH SAND AND GRAVEL (CL); dark yellowish brown (10YR 3/2), dry, medium plasticity, stiff.	50-52 ST Sample 2	50	
52.5									(52.5') WELL-GRADED GRAVEL WITH SAND (GW); yellowish brown (10YR 4/3), dry, loose, non-cohesive.		52.5
57									(57') Gradually wetter beginning at 57 ft.		57
59							(59') Wet.		59		
60									60		

NOTES: Sample 2: 8.2% moisture content, 50,000 mg/kg total organic carbon, 2.823 specific gravity, 21 LL, 15 PL, 6 PI, 60.0% gravel, 23.2% sand, 16.8% fines.



Project: Dg: eJg
 Project: W8P0121, He: : epi: East Ash PG d
 Address: 63490 E 011th, He: : epi: , 18

Job: j ORINW8OW
 Job: j Gri: J NG MB 55
 Job: PoJey 4 Cf 5

Drilling Start Date: 12/61/2126	Boring Depth (ft): 611
Drilling End Date: 12/61/2126	Boring Diameter (in): C
Drilling Company: I oscode Drimi: J	Sampling Method(s): Direct Push
Drilling Method: SG ic	DTW During Drilling (ft):
Drilling Equipment:	DTW After Drilling (ft):
Driller: aosG Wree:	Ground Surface Elev. (ft): 495.65
Logged By: B imj rGcher	Location (Lat, Long): 41.303651, -89.3043529

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE	DEPTH (ft)	
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)				Lab Sample
60			DP	100/120				(61') No clay at top of core.		60	
65								(65') Interval consistently wet.		65	
70				DP	100/120				(68.5') Thin interval dark clay (10YR 2/2). (69') Trace pebble sized gravel.		70
75									(71') No clay. (73') Gravel fines downward in last 1' to pebble size, poorly graded. (73.5') POORLY GRADED SAND (SP); trace pebbles, dark yellowish brown (10YR 3/4), very clean, dense, wet.		75
80									(77.5') Quartz & feldspar black grains, sharp upper contact. (78') As above: with more pebbles, darker (10Y 4/4).		80

NOTES:



Line: ty Dg: eJg
 Project: W8P0121, He: : epi: East Ash PG d
 Address: 63490 E 011th, He: : epi: , l8

j ORINW8OW
 j Gri: J NG MB 55
 PoJey 5 Cf 5

Drilling Start Date: 12/61/2126	Boring Depth (ft): 611
Drilling End Date: 12/61/2126	Boring Diameter (in): C
Drilling Company: I oscode Drini: J	Sampling Method(s): Direct Push
Drilling Method: SG ic	DTW During Drilling (ft):
Drilling Equipment:	DTW After Drilling (ft):
Driller: aosG Wree:	Ground Surface Elev. (ft): 495.65
Logged By: B imj rGcher	Location (Lat, Long): 41.303651, -89.3043529

DEPTH (ft)	LITHOLOGY	WATER LEVEL	BORING COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE Lab Sample	DEPTH (ft)
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)			
80			DP	96/108				(80') As above.		80
								(83.25') PEBBLY CLAY (CL); trace pebbles.		
								(84') POORLY GRADED SAND WITH CLAY AND GRAVEL (SP); medium dense, non-cohesive, moist.	85-89 Chem	85
								(85.5') SILTY SHALE; grayish green (GLE Y1 10Y 5/2), cohesive rock chips, reacts weakly with 5% acetic acid.		
90			DP	84/132						90
95										95
100								(100') End of Boring.		100

NOTES:



Client: **Dynegy**
 Project: **GLP8020, Hennepin East Ash Pond**
 Address: **13498 E 800th, Hennepin, IL**

WELL LOG
 Well No. **XPW01**
 Page: **1 of 1**

Drilling Start Date: 01/14/2021	Boring Depth (ft): 17	Well Depth (ft):
Drilling End Date: 01/14/2021	Boring Diameter (in): 10	Well Diameter (in):
Drilling Company: Geotechnology	DTW During Drilling (ft):	Screen Slot (in):
Drilling Method: Hollow Stem Auger	DTW After Drilling (ft):	Riser Material:
Drilling Equipment: CME 55	Top of Casing Elev. (ft):	Screen Material:
Driller:	Ground Elev. (ft): 498.19	Seal Material(s):
Logged By: D. Mateas	Location (Lat/Long): 41.30259, -89.30584	Filter Pack:

DEPTH (ft)	LITHOLOGY	WATER LEVEL	WELL COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE	
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)		Lab Sample	DEPTH (ft)
0			SS	15/24	4	11	(0.0') WELL-GRADED SAND (SW); light brown (2.5Y 5/4), fine to medium grained, some slag and coal fragments, 2-inch piece of slag at surface, medium dense, dry, brick fragments at 0.3 to 0.4 ft. [BOT ASH]			
			SS	21/24	2	8	(2.0') SILT (ML); dark gray (10YR 4/1), non-plastic, trace fine grained sand, medium stiff, moist. [FLY ASH]			
			SS	15/24	2	4	(2.5') As above: light gray (7.5YR 7/1), trace slag and coal fragments. (3.3') WELL-GRADED SAND (SW); light brown (2.5Y 5/4), fine to medium grained, some slag and coal fragments, 2-inch piece of slag at surface, medium dense, dry, brick fragments at 0.3 to 0.4 ft. [BOT ASH]			
5			SS	20/24	2	2	(4.0') As above. (4.5') SILT (ML); gray (2.5Y 5/1), non-plastic, trace fine grained sand, soft, moist. [FLY ASH]			
			SS	24/24	0	3	(6.0') WELL-GRADED SAND (SW); olive brown (2.5Y 4/4), fine to medium grained, little slag and coal fragments, very loose, moist. [BOTTOM ASH]	8-10 Chem		
			SH	16/24	1		(6.75') SILT (ML); brownish gray (2.5Y 6/2), non-plastic, little medium grained sand, soft, wet. [FLY ASH]			
10			SH	24/24	1		(8.0') As above. (10') As above. Failed Shelby Tube from 10-12' bgs.	10-12 Geotech Sample 1		
			SH	24/24	0		(12') WELL-GRADED SAND (SW); light olive brown (2.5Y 3/3), fine to medium grained, some slag and coal fragments, loose, wet.	12-14 ST Sample 2		
			SS	5/12	0			14-15 Chem		
15			SH	24/24	2			15-17 ST Sample 3		
20							(17') End of Boring.			

NOTES: Split Fly ash and bottom ash from 0 to 17 ft bgs. Split spoon sampler advanced to 17 ft bgs. Augers advanced to 17.25 ft bgs.
 Sample 1: 157.0% moisture content, 2.635 specific gravity, 4.0% gravel, 22.2% sand, 73.8% fines.
 Sample 2: 42.3% moisture content, 71.0 pcf dry unit weight, 2.859 specific gravity, 14.1% gravel, 71.8% sand, 14.1% fines.
 Sample 3: 31.0% moisture content, 79.0 pcf dry unit weight, 2.622 specific gravity, 10.1% gravel, 83.1% sand, 6.8% fines.

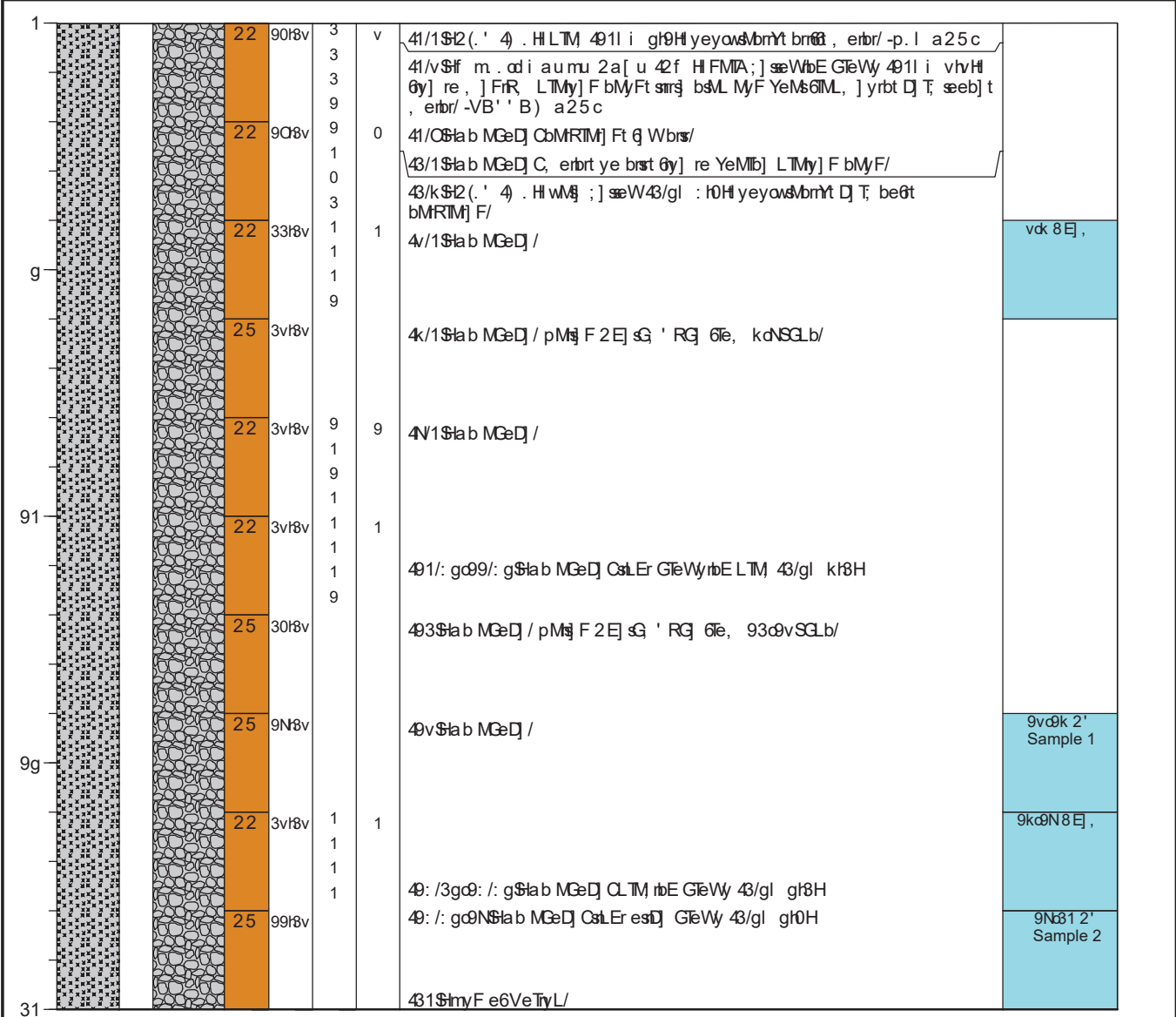
Drilling Start Date: 01/15/2021	Boring Depth (ft): 18.5	Well Depth (ft):
Drilling End Date: 01/15/2021	Boring Diameter (in): 10	Well Diameter (in):
Drilling Company: Geotechnology	DTW During Drilling (ft):	Screen Slot (in):
Drilling Method: Hollow Stem Auger	DTW After Drilling (ft):	Riser Material:
Drilling Equipment: CME 55	Top of Casing Elev. (ft):	Screen Material:
Driller:	Ground Elev. (ft): 501.60	Seal Material(s):
Logged By: D. Mateas	Location (Lat/Long): 41.30186, -89.30372	Filter Pack:

DEPTH (ft)	LITHOLOGY	WATER LEVEL	WELL COMPLETION	COLLECT				SOIL/ROCK VISUAL DESCRIPTION	MEASURE	DEPTH (ft)
				Sample Type	Recovery (in)	Blow Counts	N Value RQD (%)			
0			SS	24/24	3	19		(0.0') SILT (ML); light yellowish brown (2.5Y 6/3), non-plastic, cohesive, few medium to coarse grained sand, few fine gravel, few clay, very stiff, wet. [FLY ASH]		
9			SS	7/24	1	3		(2.0') WELL-GRADED GRAVEL (GW); light yellowish brown (2.5Y 6/3), fine to coarse grained, little sand, trace silt, very loose, wet. [BOTTOM ASH]		
10			SS	13/24	2	39		(2.3') FAT CLAY (CH); black (2.5Y 2.5/1), medium plasticity, soft, wet. [FILL]		
11			SS	13/24	2	39		(4') As above.		
5			SS	18/24	5	50/2		(4.3') WELL-GRADED GRAVEL (GW); light yellowish brown (2.5Y 6/3), fine to coarse grained, little sand, trace silt, very loose, wet. [BOTTOM ASH]	6-8 Chem	
10			SS	17/24	2	6		(4.9') As above: gray (2.5Y 5/1)		
10			SS	22/24	2	3		(6.0') WELL-GRADED SAND (SW); light gray (5Y 4/1), fine to coarse grained sand, fine gravel, few silt, trace slag, loose, wet. [BOTTOM ASH]		
10			SH	24/24	1	1		(8') As above.		
10			SH	24/24	1	1		(10') As above: olive gray (5Y 5/2), very loose.		
10			SH	24/24	1	1		(11') SILT (ML); light gray (5Y 4/1), non-plastic, trace fine grained sand, soft, saturated. [FLY ASH]		
10			SH	24/24	1	1		(12') As above: no sand. Failed Shelby Tube from 12-14' bgs.		
10			SH	26/26	2	6		(13') Grades to partially lithified structures.	14-16 ST	
10			SH	24/24	1	1		(14') As above.		
10			SH	24/24	1	1		(16') As above. Failed Shelby Tube from 16-18' bgs.	16-18 Geotech	
10			SH	6/6	1	1		(18') As above.		
20								(18.5') End of Boring.		

NOTES: Fly ash, bottom ash and fill material from 0 to 18.5 ft bgs. Split spoon sampler advanced to 18.5 ft bgs. Augers advanced to 18.6 ft bgs. Sample 1: 123.3% moisture content, 36.0 pcf dry unit weight, 2.615 specific gravity, 2.9×10^{-4} cm/s vertical hydraulic conductivity, NP, 0.0% gravel, 20.8% sand, 79.2% fines. Sample 2: 113.2% moisture content, 2.622 specific gravity, NP, 0.5% gravel, 22.1% sand, 77.4% fines.

u TsyL 2rMf u Mj C 01/14/2021	VeTyl u j wE 4tC 20	f] su] wE 4tC
u TsyL myF u Mj C 01/14/2021	VeTyl u m] rj T4yhC 10	f] surM] rj T4yhC
u TsyL 8e, wMj; C Geotechnology	u' f u RlyL u TsyL 4tC	2Yj] y 2ser 4yhC
u TsyL)] rEeFC Hollow Stem Auger	u' f a 6] Tu TsyL 4tC	i th] T) Mj TMC
u TsyL mqRw,] yrC C5 E MM	' ewe68 MryL m] D' 4tH	2Yj] y) Mj TMC
u TsyL TC	d TeRyF m] D' 4tC492.03	2] Ms) Mj TMC4tC
. eLL] F V; C D. 5 ateas	. eYmrey 4 Mh eyLH41.30326, -89.30378	pr] TPMYAC

u mP' 5 4tH	. (5B. BdI	f a' m] . nkKm	f m .	8B) P. m] (B[8 B. . m8') ma2Ui m	u mP' 5 4tH
					2M w] ' ; wj	i] YeD] T; 4yh	VseW8eRyrb	[KM] ; Qu 4%h		
									2B(. hi B87 K(2Ua. um28i (P' (B[



[B' m2C ps MbE 6le, 1 re 31 6 GLb/ Split spoon sampler advanced to 20 ft bgs. Augers advanced to 19.43 ft bgs. Sample 1: 177.0% moisture content, 28.0 pcf dry unit weight, 2.595 specific gravity, 1.7x10⁻⁴ cm/s vertical hydraulic conductivity, NP, 0.0% gravel, 13.7% sand, 86.3% fines. Sample 2: 138.8% moisture content, 34.0 pcf dry unit weight, 2.585 specific gravity, 2.0x10⁻⁴ cm/s vertical hydraulic conductivity, NP, 0.0% gravel, 18.6% sand, 81.4% fines.

**APPENDIX A
BORING LOGS AND WELL CONSTRUCTION LOGS
GEOSYNTEC WELL CONSTRUCTION LOGS**

MONITORING WELL CONSTRUCTION DETAIL

Well ID	<u>MW52</u>	Site Location	<u>Hennepin, IL</u>
Project Name	<u>Vistra - Hennepin East Ash Pond</u>	Field Personnel	<u>Will Blocher, Sam Baushke</u>
Project Number	<u>GLP8020</u>	Recorded By	<u>Will Blocher</u>

Permit Number _____

Installation Date(s) 2/11/21

Drilling Method Sonic

Borehole Diameter 6"

Drilling Contractor Cascade

Driller Jason Green

Drilling Fluid water

Fluid Loss During Drilling 150 Gallons

Materials Used

Riser Pipe: Diameter 2 inches
Construction
 PVC schedule _____
 Stainless Steel
 Other _____

Slotted Area: Length 10 feet
Diameter 2 inches
Slot Size 0.010 inches
Construction
 PVC schedule _____
 Stainless Steel
 Other _____

Silt Trap Used Yes No

Bottom End Cap: Male Female Slip
 PVC
 Stainless Steel
 Other _____

Top Cap: Male Female Slip J Plug
 PVC
 Stainless Steel
 Other _____

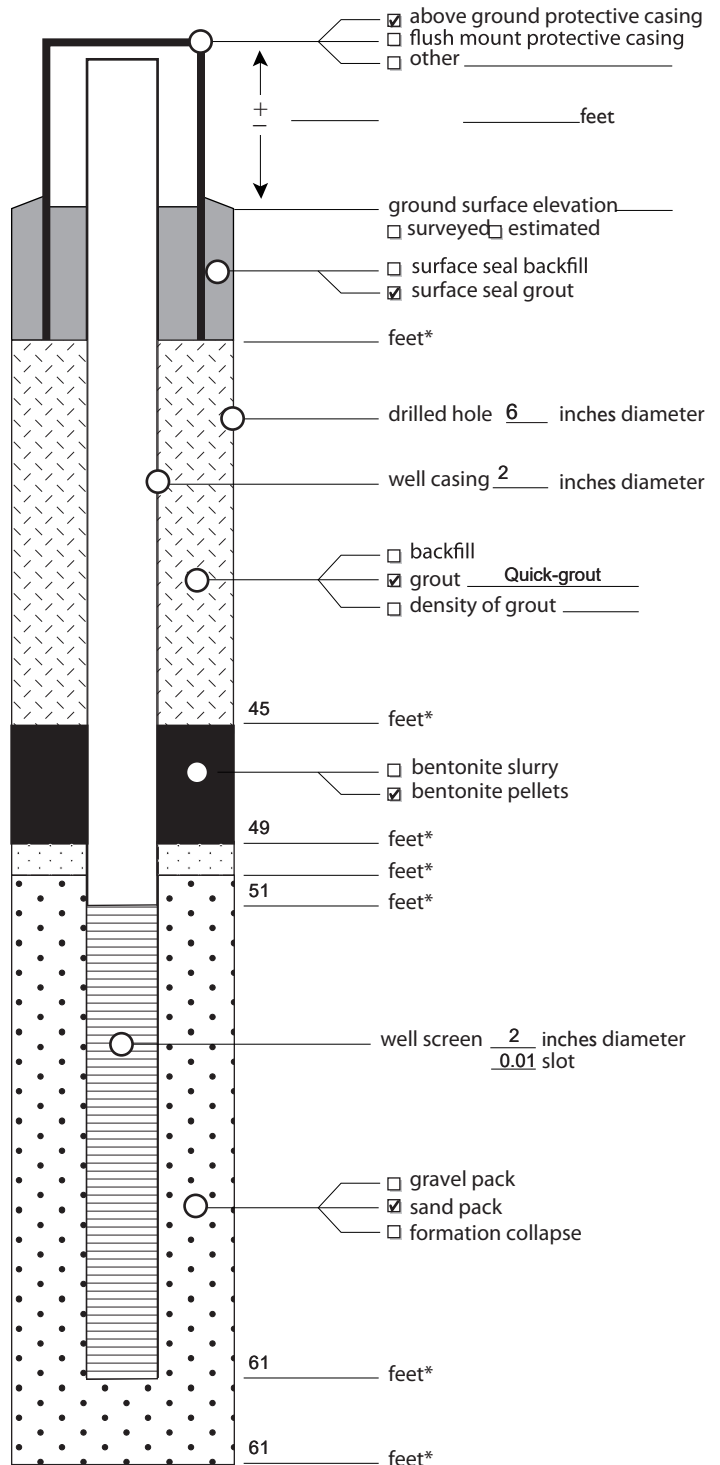
Protective Casing:
Length _____ feet
Diameter _____ inches
Construction Cast Aluminum
 Cast Steel
 Other _____

Casing Installation:
Length _____ feet
Diameter _____ inches
Material _____

Sandpack:
Coarse Sand: 4 bags of 50 lb per bag Graded Sand
Size #5
 Fine Sand: _____ bags of _____ lb per bag Size _____

Seal:
Bentonite Pellets: 1 bags of 50 Type _____
 Bentonite Slurry: _____ bags of _____ lb per bag Type _____

Grout:
Cement: 2 bags of 50 lb per bag Type Quick-grout
 Bentonite: _____ bags of _____ lb per bag Type _____



Measuring Point is Top of Well Casing
Unless Otherwise Noted

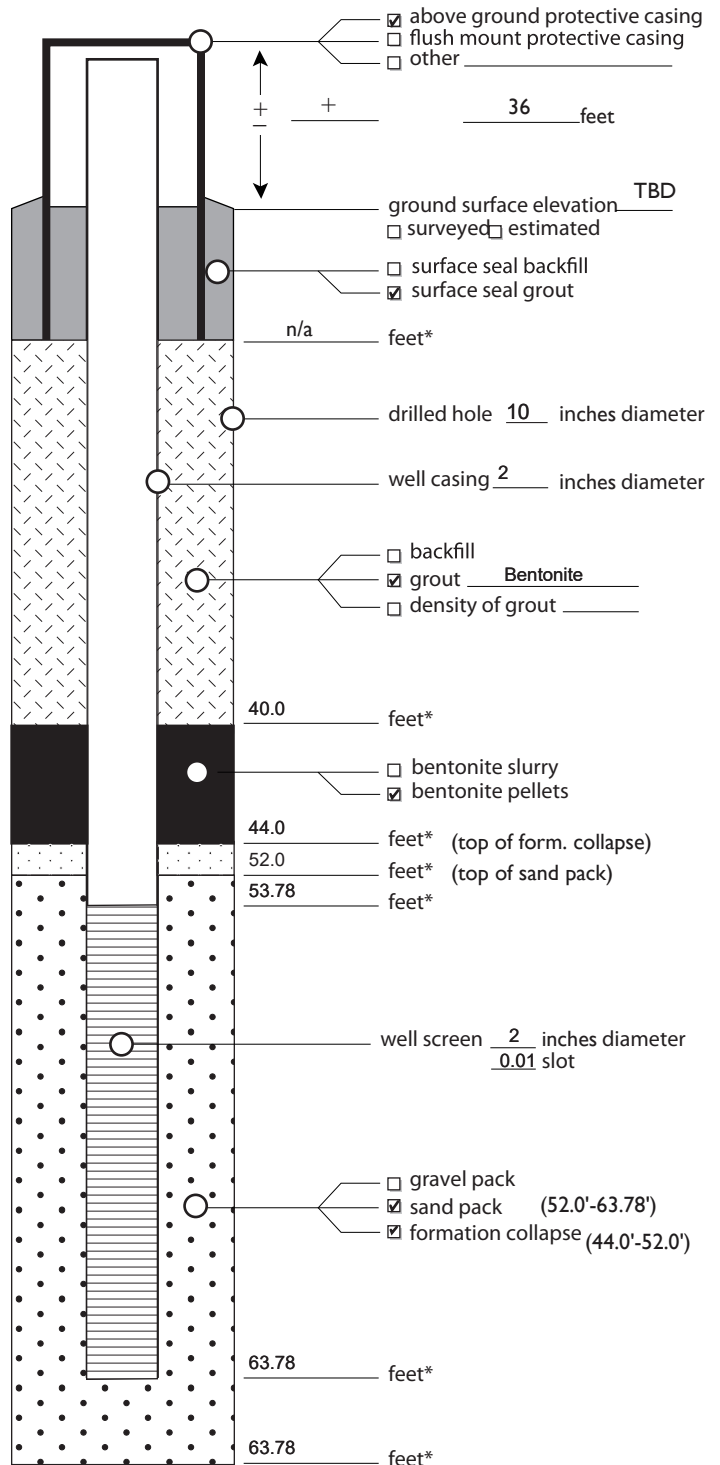
* Depth Below Ground Surface

MONITORING WELL CONSTRUCTION DETAIL

Well ID	<u>MW53</u>	Site Location	<u>Hennepin, IL</u>
Project Name	<u>Vistra - Hennepin East Ash Pond</u>	Field Personnel	<u>D. Mateas + A. Toye</u>
Project Number	<u>GLP8020</u>	Recorded By	<u>D. Mateas</u>

Permit Number	_____
Installation Date(s)	<u>01/12/21 - 01/13/21</u>
Drilling Method	<u>Hollow Stem Auger</u>
Borehole Diameter	<u>10"</u>
Drilling Contractor	<u>Geotechnology</u>
Driller	<u>Pat Hart</u>
Drilling Fluid	<u>n/a</u>
Fluid Loss During Drilling	<u>n/a</u> Gallons

Materials Used	
Riser Pipe:	Diameter <u>2</u> inches Construction <input checked="" type="checkbox"/> PVC schedule <u>40</u> <input type="checkbox"/> Stainless Steel <input type="checkbox"/> Other _____
Slotted Area:	Length <u>10</u> feet Diameter <u>2</u> inches Slot Size <u>0.010</u> inches Construction <input checked="" type="checkbox"/> PVC schedule <u>40</u> <input type="checkbox"/> Stainless Steel <input type="checkbox"/> Other _____ Silt Trap Used <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Bottom End Cap:	<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Slip <input checked="" type="checkbox"/> PVC <input type="checkbox"/> Stainless Steel <input type="checkbox"/> Other _____
Top Cap:	<input type="checkbox"/> Male <input type="checkbox"/> Female <input checked="" type="checkbox"/> Slip <input type="checkbox"/> J Plug <input checked="" type="checkbox"/> PVC <input type="checkbox"/> Stainless Steel <input type="checkbox"/> Other _____
Protective Casing:	Length <u>5</u> feet Diameter <u>4 x 4</u> inches Construction <input type="checkbox"/> Cast Aluminum <input checked="" type="checkbox"/> Cast Steel <input type="checkbox"/> Other _____
Casing Installation:	Length <u>n/a</u> feet Diameter <u>n/a</u> inches Material <u>n/a</u>
FilterSil	Sandpack: _____ Graded Sand Coarse Sand: <u>3.5</u> bags of <u>50</u> lb per bag _____ Size _____ Fine Sand: _____ bags of _____ lb per bag _____ Size _____
3/8" Halliburton Holeplug	Seal: Bentonite Pellets: <u>1</u> bags of <u>50</u> Type <u>Bent. chips</u> Bentonite Slurry: _____ bags of _____ lb per bag Type _____
20% Solids Halliburton Quick-Grout	Grout: Cement: _____ bags of _____ lb per bag Type _____ Bentonite: <u>8.5</u> bags of <u>50</u> lb per bag Type <u>Bent. grout</u> + Used 180 Gallons of grout

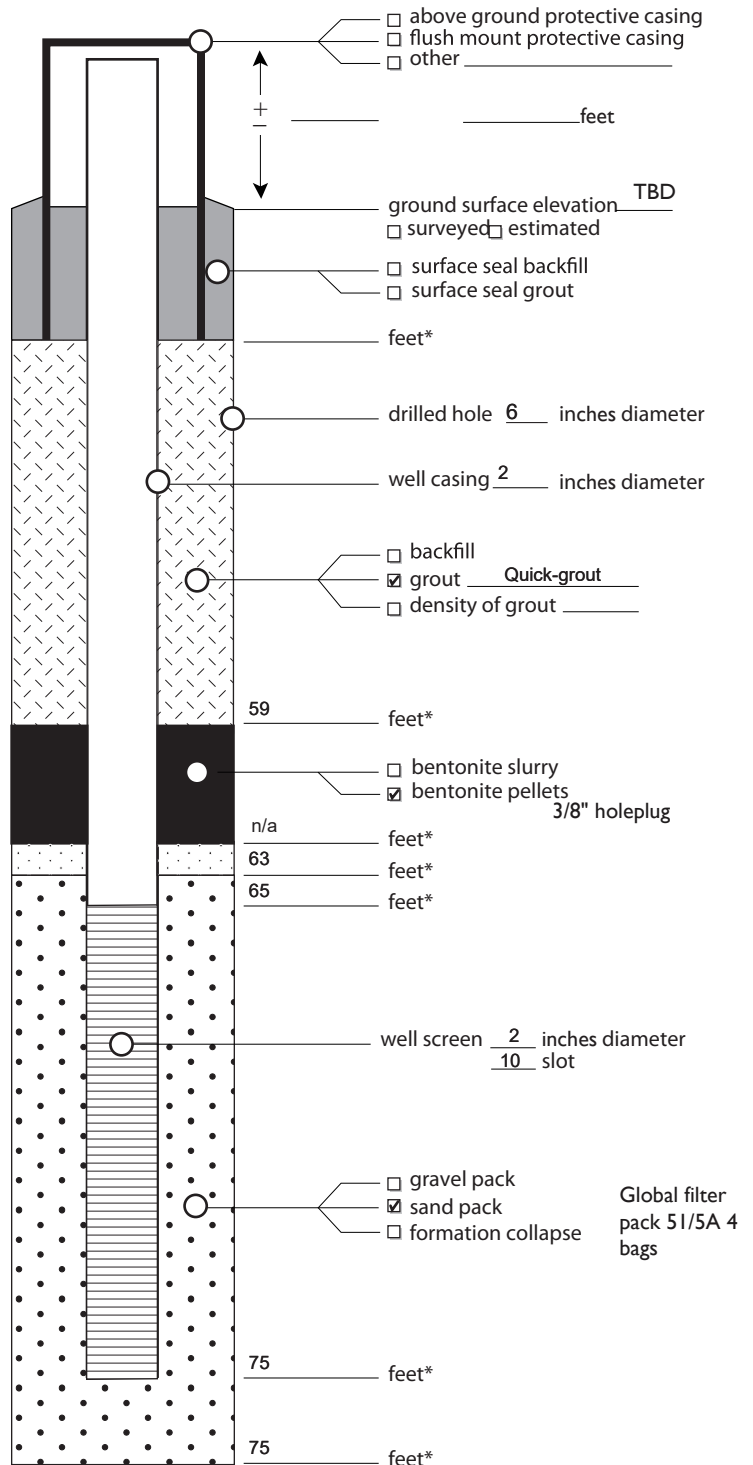


MONITORING WELL CONSTRUCTION DETAIL

Well ID	<u>MW54</u>	Site Location	<u>Hennepin, IL</u>
Project Name	<u>Vistra - Hennepin East Ash Pond</u>	Field Personnel	_____
Project Number	<u>GLP8020</u>	Recorded By	_____

Permit Number	<u>n/a</u>
Installation Date(s)	<u>2/8/21 - 2/9/21</u>
Drilling Method	<u>Sonic</u>
Borehole Diameter	<u>6"</u>
Drilling Contractor	<u>Cascade</u>
Driller	<u>Jason Green</u>
Drilling Fluid	<u>water</u>
Fluid Loss During Drilling	<u>400</u> Gallons

Materials Used	
Riser Pipe:	Diameter <u>2</u> inches Construction <input checked="" type="checkbox"/> PVC schedule <u>40</u> <input type="checkbox"/> Stainless Steel <input type="checkbox"/> Other _____
Slotted Area:	Length <u>10</u> feet Diameter <u>2</u> inches Slot Size <u>0.010</u> inches Construction <input checked="" type="checkbox"/> PVC schedule <u>40</u> <input type="checkbox"/> Stainless Steel <input type="checkbox"/> Other _____ Silt Trap Used <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Bottom End Cap:	<input type="checkbox"/> Male <input checked="" type="checkbox"/> Female <input type="checkbox"/> Slip <input checked="" type="checkbox"/> PVC <input type="checkbox"/> Stainless Steel <input type="checkbox"/> Other _____
Top Cap:	<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Slip <input checked="" type="checkbox"/> J Plug <input type="checkbox"/> PVC <input type="checkbox"/> Stainless Steel <input type="checkbox"/> Other _____
Protective Casing:	Length _____ feet Diameter _____ inches Construction <input type="checkbox"/> Cast Aluminum <input type="checkbox"/> Cast Steel <input type="checkbox"/> Other _____
Casing Installation:	Length _____ feet Diameter <u>2</u> inches Material <u>PVC</u>
Sandpack:	Coarse Sand: <u>4</u> bags of <u>51/5A</u> <u>50</u> lb per bag <u>Size #5</u> Fine Sand: <u>-</u> bags of <u>-</u> lb per bag <u>-</u> Size
Seal:	Bentonite Pellets: <u>1</u> bags of <u>50</u> Type <u>3/8"</u> Bentonite Slurry: <u>-</u> bags of <u>-</u> lb per bag Type <u>-</u>
Grout:	Cement: <u>-</u> bags of <u>-</u> lb per bag Type <u>-</u> Bentonite: <u>3</u> bags of <u>50</u> lb per bag Type <u>Quick-grout</u>



Measuring Point is Top of Well Casing
Unless Otherwise Noted

* Depth Below Ground Surface

MONITORING WELL CONSTRUCTION DETAIL

Well ID	<u>MW55</u>	Site Location	<u>Hennepin, IL</u>
Project Name	<u>Vistra - Hennepin East Ash Pond</u>	Field Personnel	<u>Will Blocher, Sam Baushke</u>
Project Number	<u>GLP8020</u>	Recorded By	<u>Will Blocher</u>

Permit Number _____

Installation Date(s) 2/10/21

Drilling Method Sonic

Borehole Diameter 6"

Drilling Contractor Cascade

Driller Jason Green

Drilling Fluid water

Fluid Loss During Drilling 250 Gallons

Materials Used

Riser Pipe: Diameter 2 inches
Construction
 PVC schedule _____
 Stainless Steel
 Other _____

Slotted Area: Length 5 feet
Diameter 2 inches
Slot Size 0.010 inches
Construction
 PVC schedule _____
 Stainless Steel
 Other _____

Silt Trap Used Yes No

Bottom End Cap: Male Female Slip
 PVC
 Stainless Steel
 Other _____

Top Cap: Male Female Slip J Plug
 PVC
 Stainless Steel
 Other _____

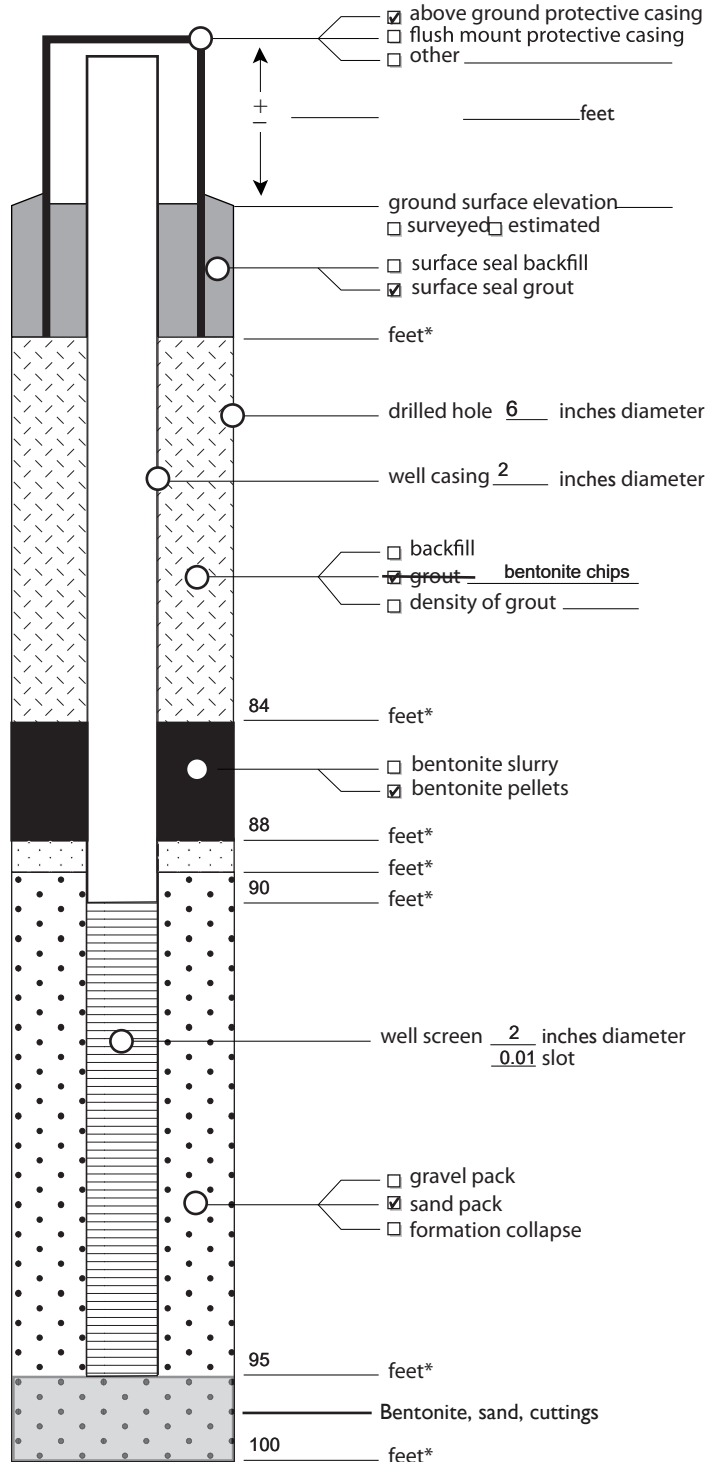
Protective Casing:
Length _____ feet
Diameter _____ inches
Construction Cast Aluminum
 Cast Steel
 Other _____

Casing Installation:
Length _____ feet
Diameter _____ inches
Material _____

Sandpack: Graded Sand
Coarse Sand: 2.5 bags of 50 lb per bag Size #5
Fine Sand: _____ bags of _____ lb per bag Size _____

Seal:
Bentonite Pellets: 1 bags of 50 Type _____
Bentonite Slurry: _____ bags of _____ lb per bag Type _____

Grout:
Cement: 5.8 bags of 50 lb per bag Type Quick-grout
Bentonite: >15 bags of 50 lb per bag Type _____



Measuring Point is Top of Well Casing
Unless Otherwise Noted

* Depth Below Ground Surface

cement largely lost into aquifer

MONITORING WELL CONSTRUCTION DETAIL

Well ID	<u>XPW01</u>	Site Location	<u>Hennepin, IL</u>
Project Name	<u>Vistra - Hennepin East Ash Pond</u>	Field Personnel	<u>D. Mateas</u>
Project Number	<u>GLP8020</u>	Recorded By	<u>D. Mateas</u>

Permit Number _____

Installation Date(s) 01/14/21

Drilling Method Hollow Stem Auger

Borehole Diameter 10"

Drilling Contractor Geotechnology

Driller Pat Hart

Drilling Fluid n/a

Fluid Loss During Drilling n/a Gallons

Materials Used

Riser Pipe: Diameter 2 inches
Construction
 PVC schedule 40
 Stainless Steel
 Other _____

Slotted Area: Length 5 feet
Diameter 2 inches
Slot Size 0.010 inches
Construction
 PVC schedule 40
 Stainless Steel
 Other _____

Silt Trap Used Yes No

Bottom End Cap: Male Female Slip
 PVC
 Stainless Steel
 Other _____

Top Cap: Male Female Slip J Plug
 PVC
 Stainless Steel
 Other _____

Protective Casing:
Length 5 feet
Diameter 4 x 4 inches
Construction Cast Aluminum
 Cast Steel
 Other _____

Casing Installation: Length n/a feet
Diameter n/a inches
Material n/a

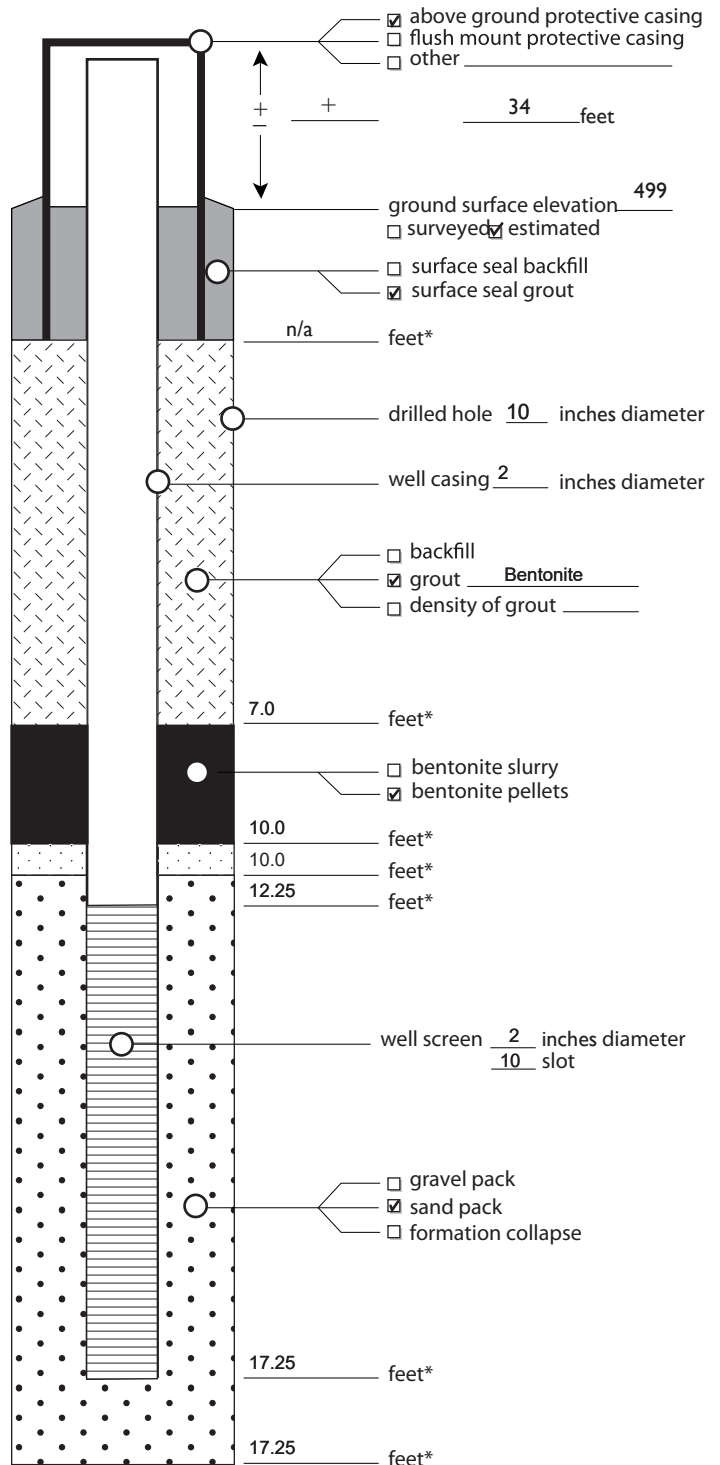
FilterSil
Sandpack: _____ Graded Sand
Coarse Sand: 3 bags of 50 lb per bag _____ Size _____
Fine Sand: _____ bags of _____ lb per bag _____ Size _____

3/8" Halliburton Holeplug

20% Solids Halliburton Quick-Grout

Seal:
Bentonite Pellets: 1 bags of 50 Type Bent. chips
Bentonite Slurry: _____ bags of _____ lb per bag Type _____

Grout:
Cement: _____ bags of _____ lb per bag Type _____
Bentonite: 2 bags of 50 lb per bag Type bent. grout
+ Used 25 Gallons of grout



Measuring Point is Top of Well Casing
Unless Otherwise Noted

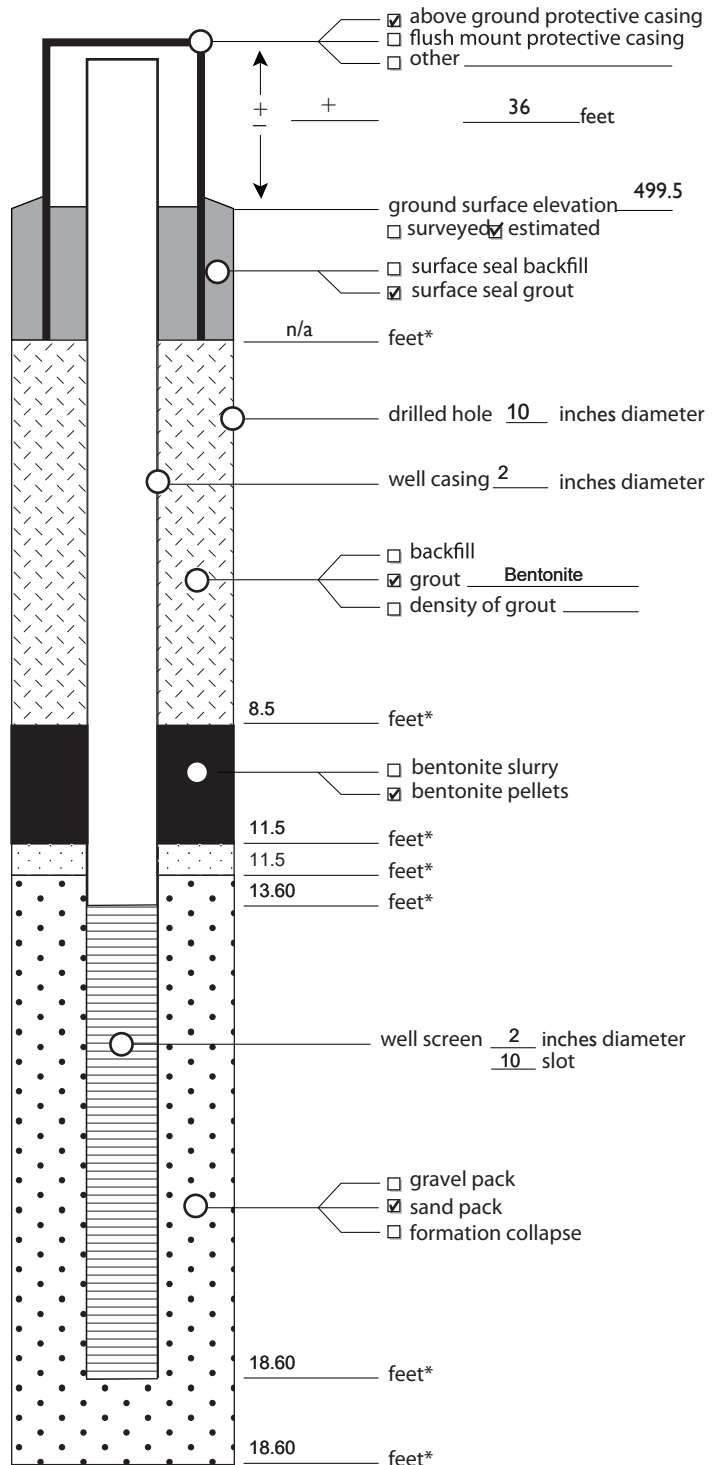
* Depth Below Ground Surface

MONITORING WELL CONSTRUCTION DETAIL

Well ID	<u>XPW02</u>	Site Location	<u>Hennepin, IL</u>
Project Name	<u>Vistra - Hennepin East Ash Pond</u>	Field Personnel	<u>D. Mateas</u>
Project Number	<u>GLP8020</u>	Recorded By	<u>D. Mateas</u>

Permit Number	_____
Installation Date(s)	<u>01/15/21</u>
Drilling Method	<u>Hollow Stem Auger</u>
Borehole Diameter	<u>10"</u>
Drilling Contractor	<u>Geotechnology</u>
Driller	<u>Pat Hart</u>
Drilling Fluid	<u>n/a</u>
Fluid Loss During Drilling	<u>n/a</u> Gallons

Materials Used	
Riser Pipe:	Diameter <u>2</u> inches Construction <input checked="" type="checkbox"/> PVC schedule <u>40</u> <input type="checkbox"/> Stainless Steel <input type="checkbox"/> Other _____
Slotted Area:	Length <u>5</u> feet Diameter <u>2</u> inches Slot Size <u>0.010</u> inches Construction <input checked="" type="checkbox"/> PVC schedule <u>40</u> <input type="checkbox"/> Stainless Steel <input type="checkbox"/> Other _____ Silt Trap Used <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Bottom End Cap:	<input type="checkbox"/> Male <input checked="" type="checkbox"/> Female <input type="checkbox"/> Slip <input checked="" type="checkbox"/> PVC <input type="checkbox"/> Stainless Steel <input type="checkbox"/> Other _____
Top Cap:	<input type="checkbox"/> Male <input type="checkbox"/> Female <input checked="" type="checkbox"/> Slip <input type="checkbox"/> J Plug <input checked="" type="checkbox"/> PVC <input type="checkbox"/> Stainless Steel <input type="checkbox"/> Other _____
Protective Casing:	Length <u>5</u> feet Diameter <u>4 x 4</u> inches Construction <input type="checkbox"/> Cast Aluminum <input checked="" type="checkbox"/> Cast Steel <input type="checkbox"/> Other _____
Casing Installation:	Length <u>n/a</u> feet Diameter <u>n/a</u> inches Material <u>n/a</u>
FilterSil	Sandpack: _____ Graded Sand Coarse Sand: <u>3</u> bags of <u>50</u> lb per bag _____ Size _____ Fine Sand: _____ bags of _____ lb per bag _____ Size _____
3/8" Halliburton Holeplug	Seal: Bentonite Pellets: <u>1</u> bags of <u>50</u> Type <u>Bent. chips</u> Bentonite Slurry: _____ bags of _____ lb per bag Type _____
20% Solids Halliburton Quick-Grout	Grout: Cement: _____ bags of _____ lb per bag Type _____ Bentonite: <u>2</u> bags of <u>50</u> lb per bag Type <u>bent. grout</u> + Used 30 Gallons of grout



Measuring Point is Top of Well Casing
Unless Otherwise Noted

* Depth Below Ground Surface

**MONITORING WELL
CONSTRUCTION DETAIL**

Well ID	<u>XPW03</u>	Site Location	<u>Hennepin, IL</u>
Project Name	<u>Vistra - Hennepin East Ash Pond</u>	Field Personnel	<u>D.Mateas / A. Toye / C. Luttrell</u>
Project Number	<u>GLP8020</u>	Recorded By	<u>D. Mateas</u>

Permit Number _____

Installation Date(s) 01/14/21

Drilling Method Hollow Stem Auger

Borehole Diameter 10"

Drilling Contractor Geotechnology

Driller Pat Hart

Drilling Fluid n/a

Fluid Loss During Drilling n/a Gallons

Materials Used

Riser Pipe: Diameter 2 inches
Construction
 PVC schedule 40
 Stainless Steel
 Other _____

Slotted Area: Length 5 feet
Diameter 2 inches
Slot Size 0.010 inches
Construction
 PVC schedule 40
 Stainless Steel
 Other _____

Silt Trap Used Yes No

Bottom End Cap: Male Female Slip
 PVC
 Stainless Steel
 Other _____

Top Cap: Male Female Slip J Plug
 PVC
 Stainless Steel
 Other _____

Protective Casing:
Length 5 feet
Diameter 4 x 4 inches
Construction Cast Aluminum
 Cast Steel
 Other _____

Casing Installation:
Length n/a feet
Diameter n/a inches
Material n/a

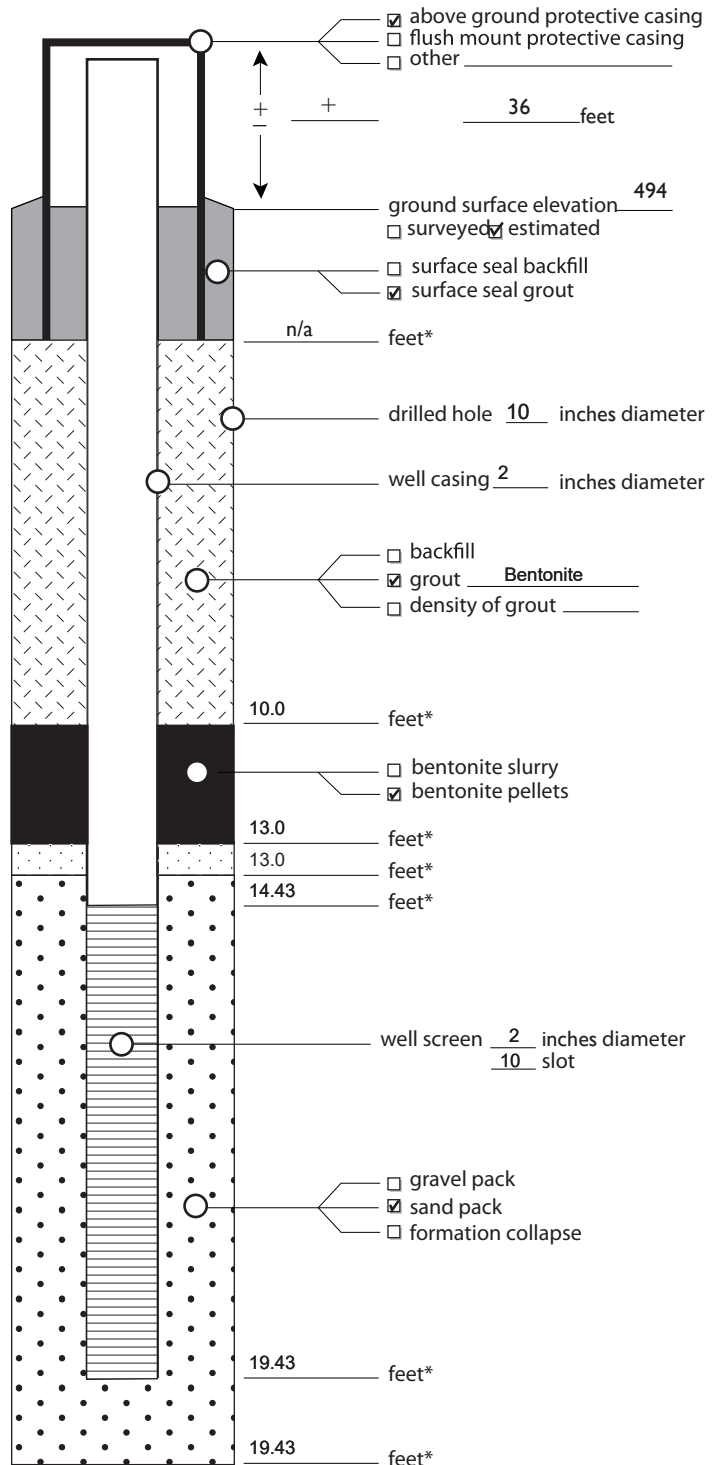
FilterSil
Sandpack: _____ Graded Sand
Coarse Sand: 3 bags of 50 lb per bag _____ Size _____
Fine Sand: _____ bags of _____ lb per bag _____ Size _____

3/8" Halliburton Holeplug

20% Solids Halliburton Quick-Grout

Seal:
Bentonite Pellets: 1 bags of 50 Type Bent. chips
Bentonite Slurry: _____ bags of _____ lb per bag Type _____

Grout:
Cement: _____ bags of _____ lb per bag Type _____
Bentonite: 2 bags of 50 lb per bag Type bent. grout
+ Used 30 Gallons of grout



Measuring Point is Top of Well Casing
Unless Otherwise Noted

* Depth Below Ground Surface

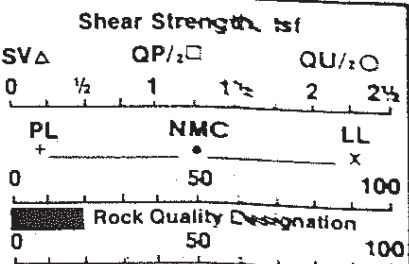
**APPENDIX A
BORING LOGS AND WELL CONSTRUCTION LOGS
MATHES BORING LOGS**

RECORD OF SUBSURFACE EXPLORATION

PROJECT Hydrogeologic Study
Hennepin Power Plant
 JOB NO. 82-1293

BORING E-2 Renamed 02
 SHEET 1 OF 2

DEPTH (ft)	SAMPLE		SEE REMARK #	DESCRIPTION OF MATERIALS (Color Modifier MATERIAL Classification) Soil Classification System <u>Unified</u> Surface Elevation <u>488.8'</u>	BLOWS (per 6 in)	DRY UNIT WEIGHT (pcf)	Shear Strength, tsf		
	NUMBER	INTERVAL AND TYPE					ADVANCED / RECOVERED (in)	SV Δ	QP $\frac{1}{2}$ \square
-5-	1	SS 18/4		Brown Silty CLAY, CL Brown GRAVEL w/ Sand, Clay, GC	5-2-22				
-10-	2	SS 18/12		Brown Medium-Coarse SAND w/ Gravel, Clay, SC	10-23-19				
-15-	3	SS 13/8			15-14-11				
-20-	4	SS 18/10			8-17-12				
-25-	5	SS 18/5		Gray-Brown GRAVEL w/Sand, GP	49-27-25				
-30-	6	SS 18/8		Gray-Brown Fine SAND Trace Silt, SP-SM	15-12-9				
-35-	7	SS 18/14			7-10-13				



DRILLING METHOD NW Casing Advancer
 DATE DRILLED 11/24, 29/82
 DRILLED BY Roberts
 LOGGED BY Maxeiner
 PIEZOMETER Yes

GROUNDWATER LEVELS
 Encountered at _____ Feet
 15 Hours after completion 42.1 Feet
 17 Days after completion 34.3 Feet
 _____ after completion _____ Feet

NOTE: Refer to the attached GENERAL NOTES and NOTATION USED ON RECORDS OF SUBSURFACE EXPLORATION for abbreviations, explanations, and qualifications relative to this log.



John Mathes & Associates, Inc.

PROJECT Hydrogeologic Study
Hennepin Power Plant.
 JOB NO. 82-1293

BORING E-2 Renamed 02
 SHEET 2 OF 2

DEPTH (ft)	SAMPLE		SEE REMARK #	DESCRIPTION OF MATERIALS (Color Modifier MATERIAL. Classification) Soil Classification System <u>Unified</u> Surface Elevation <u>488.8'</u>	BLOWS (per 6 in)	DRY UNIT WEIGHT (pcf)	Shear Strength, tsf		
	NUMBER	INTERVAL AND TYPE					ADVANCED / RECOVERED (in)	SV Δ	QP/2 \square
7	SS	18/14		Gray-Brown Fine SAND Trace Silt, SP-SM	7-10-13				
40	8	SS	18/18	-Clay Seam 40.2-41.1' Brown Silty Fine SAND, SM	5-8-10				
45	9	SS	18/10	-Black Peat @ 45.3' Gray-Brown Sandy GRAVEL Trace Clay, GP	8-9-10				
50	10	SS	18/8		34-29-32				
55	11	SS	18/6	Brown Medium SAND Trace Coarse, SP TOB <u>433.0'</u>	5-18-16				
60									

DRILLING METHOD NW Casing Advancer
 DATE DRILLED 11/24, 29/82
 DRILLED BY Roberts
 LOGGED BY Maxeiner
 PIEZOMETER Yes

GROUNDWATER LEVELS

Encountered at _____ Feet
 15 Hours after completion 42.1 Feet
 17 Days after completion 34.3 Feet
 _____ after completion _____ Feet

NOTE: Refer to the attached GENERAL NOTES and NOTATION USED ON RECORDS OF SUBSURFACE EXPLORATION for abbreviations, explanations, and qualifications relative to this log.



John Mathes & Associates, Inc.

RECORD OF SUBSURFACE EXPLORATION

PROJECT Hydrogeologic Study
Hennepin Power Plant
 JOB NO. 82-1293

BORING E-6 Renamed 06
 SHEET 1 OF 2

DEPTH (ft)	SAMPLE			SEE REMARK #	DESCRIPTION OF MATERIALS (Color Modifier MATERIAL Classification)	BLOWS (per 6 in)	DRY UNIT WEIGHT (pcf)	Shear Strength, tsf											
	NUMBER	INTERVAL AND TYPE	ADVANCED / RECOVERED (in)					SV Δ	QP/2 \square	QU/2 \circ	PL	NMC	LL	Rock Quality Designation					
					Soil Classification System <u>Unified</u>			0	1/2	1	1 1/2	2	2 1/2	0	50	100	0	50	100
	1	AS			Dark Brown Silty CLAY w/Sand, CL														
-5	2	SS	18/8		Brown Sandy CLAY w/Gravel, CL	3-3-2													
					Gray-Brown Sandy GRAVEL, GP														
-10	3	SS	18/9			12-12-13													
-15	4	SS	18/10		Gray-Brown GRAVEL w/Sand Trace Clay, GP	9-30-35													
-20	5	SS	4/4			50/4"													
-25	6	SS	18/6			6-10-14													
-30	7	SS	18/4			3-5-7													
-35	8	SS	18/7			5-7-12													

DRILLING METHOD Hollow Auger
 DATE DRILLED 12/8/82
 DRILLED BY Roberts
 LOGGED BY Maxeiner
 PIEZOMETER Yes

GROUNDWATER LEVELS

Encountered at 18.0 Feet
 _____ Hours after completion _____ Feet
8 Days after completion 12.4 Feet
 _____ after completion _____ Feet

NOTE: Refer to the attached GENERAL NOTES and NOTATION USED ON RECORDS OF SUBSURFACE EXPLORATION for abbreviations, explanations, and qualifications relative to this log.



John Mathes & Associates, Inc.

RECORD OF SUBSURFACE EXPLORATION

PROJECT Hydrogeologic Study
Hennepin Power Plant
 JOB NO. 82-1293

BORING E-6 Renamed 06
 SHEET 2 OF 2

DEPTH (ft)	SAMPLE			SEE REMARK #	DESCRIPTION OF MATERIALS (Color Modifier MATERIAL Classification)	BLOWS (per 6 in)	DRY UNIT WEIGHT (pcf)	Shear Strength, tsf											
	NUMBER	INTERVAL AND TYPE	ADVANCED / RECOVERED (in)					SV Δ	QP/2 \square	QU/2 \circ	PL	NMC	LL	Rock Quality Designation					
8		SS			Gray-Brown GRAVEL w/Sand Trace Clay, GP														
40	9	SS	18/6		TOB $\approx 426.0'$	5-6-6													

DRILLING METHOD Hollow Auger
 DATE DRILLED 12/8/82
 DRILLED BY Roberts
 LOGGED BY Maxeiner
 PIEZOMETER Yes

GROUNDWATER LEVELS
 Encountered at 18.0 Feet
 Hours after completion Feet
8 Days after completion 12.4 Feet
 after completion Feet

NOTE: Refer to the attached GENERAL NOTES and NOTATION USED ON RECORDS OF SUBSURFACE EXPLORATION for abbreviations, explanations, and qualifications relative to this log.



John Mathes & Associates, Inc.

RECORD OF SUBSURFACE EXPLORATION

PROJECT I.P. Hennepin, Hydrogeologic Investigation
 JOB NO. 04-1934

BORING E-7 Renamed 07
 SHEET 1 OF 3

DEPTH (ft)	SAMPLE			SEE REMARK #	DESCRIPTION OF MATERIALS (Color Modifier MATERIAL. Classification) Soil Classification System <u>Unified</u> Surface Elevation <u>515.2'</u>	BLOWS (per 6 in)	DRY UNIT WEIGHT (pcf)	Shear Strength, tsf												
	NUMBER	INTERVAL AND TYPE	ADVANCED / RECOVERED (in)					SV Δ	QP \square	QU \circ	PL	NMC	LL	Rock Quality Designation						
5	1	SS	18/13		Brown Fine SAND w/Silt, SM	4-6-6														
10	2	SS	18/14		Brown Fine SAND w/Coarse Trace Gravel, Silt, SP	7-7-8														
15	3	SS	18/16		Brown Gravelly Medium-Coarse SAND w/Fine, Silt, SM	18-35-33														
20	4	SS	18/12																	
25	5	SS	18/6																	
30	6	SS	18/-		Brown Gravelly Fine SAND w/Medium Trace Silt, SP-SM	17-31-44														
35	7	SS	18/-		Brown Gravelly Medium-Coarse SAND w/Silt, SM	19-29-37														

DRILLING METHOD Casing Advancer & NW
 DATE DRILLED 11/13-15/84
 DRILLED BY Maniaci
 LOGGED BY Hebel/Maxeiner
 PIEZOMETER Yes

GROUNDWATER LEVELS
 Encountered at - Feet
- Hours after completion - Feet
- after completion - Feet
- after completion - Feet

NOTE: Refer to the attached GENERAL NOTES and NOTATION USED ON RECORDS OF SUBSURFACE EXPLORATION for abbreviations, explanations, and qualifications relative to this log.



John Mathes & Associates, Inc.

RECORD OF SUBSURFACE EXPLORATION

PROJECT I.P. Hennepin, Hydrogeologic Investigation
 JOB NO. 04-1934

BORING E-7 Renamed 07
 SHEET 2 OF 3

DEPTH (ft)	SAMPLE			SEE REMARK #	DESCRIPTION OF MATERIALS (Color Modifier MATERIAL. Classification) Soil Classification System <u>Unified</u> Surface Elevation <u>515.2'</u>	BLOWS (per 6 in)	DRY UNIT WEIGHT (pcf)	Shear Strength, tsf												
	NUMBER	INTERVAL AND TYPE	ADVANCED / RECOVERED (in)					SV Δ	QP $\frac{1}{2}$ \square	QU $\frac{1}{2}$ \circ	PL	NMC	LL							
40	8	SS	18/12		Brown Gravelly Medium-Coarse SAND w/Silt, SM - Boulders 55.0-57.0' Gray Fine-Medium SAND Trace Coarse, SP	10-23-27														
45	9	SS	18/14			12-20-25														
50	10	SS	18/11			14-31-36														
55	11	SS	18/14			16-46-52														
60	12	SS	18/3			12-22-30														
65	13	SS	18/12			18-27-43														
70	14	SS	18/12			20-22-34														

DRILLING METHOD Casing Advancer & NW
 DATE DRILLED 11/13-15/84
 DRILLED BY Maniaci
 LOGGED BY Hebel/Maxeiner
 PIEZOMETER Yes

GROUNDWATER LEVELS

Encountered at _____ Feet
 _____ Hours after completion _____ Feet
 _____ after completion _____ Feet
 _____ after completion _____ Feet

NOTE: Refer to the attached GENERAL NOTES and NOTATION USED ON RECORDS OF SUBSURFACE EXPLORATION for abbreviations, explanations, and qualifications relative to this log.



John Mathes & Associates, Inc.

RECORD OF SUBSURFACE EXPLORATION

PROJECT I. P. Hennepin, Hydrogeologic Investigation
 JOB NO. 04-1934

BORING E-7 Renamed 07
 SHEET 3 OF 3

DEPTH (ft)	SAMPLE			SEE REMARK #	DESCRIPTION OF MATERIALS (Color Modifier MATERIAL. Classification) Soil Classification System <u>Unified</u> Surface Elevation <u>515.2'</u>	BLOWS (per 6 in)	DRY UNIT WEIGHT (pcf)	Shear Strength, tsf											
	NUMBER	INTERVAL AND TYPE	ADVANCED / RECOVERED (in)					SV Δ	QP \square	QU \circ	PL	NMC	LL						
75	15	SS	18/10		Gr Fi-Med SAND Tr Co, SP Gray Medium SAND w/Fine Trace Gravel, SP	15-15-22													
80					TOB														
85																			
90																			
95																			
100																			
105																			

DRILLING METHOD Casing Advancer & NW
 DATE DRILLED 11/13-15/84
 DRILLED BY Maniaci
 LOGGED BY Hebel/Maxeiner
 PIEZOMETER Yes

GROUNDWATER LEVELS
 Encountered at _____ Feet
 _____ Hours after completion _____ Feet
 _____ after completion _____ Feet
 _____ after completion _____ Feet

NOTE: Refer to the attached GENERAL NOTES and NOTATION USED ON RECORDS OF SUBSURFACE EXPLORATION for abbreviations, explanations, and qualifications relative to this log.



RECORD OF SUBSURFACE EXPLORATION

PROJECT I. P. Hennepin, Hydrogeologic Investigation
 JOB NO. 04-1934

BORING E-88 Renamed 08
 SHEET 1 OF 2

DEPTH (ft)	SAMPLE			SEE REMARK #	DESCRIPTION OF MATERIALS (Color Modifier MATERIAL. Classification) Soil Classification System <u>Unified</u> Surface Elevation <u>498.7'</u>	BLOWS (per 6 in)	DRY UNIT WEIGHT (pcf)	Shear Strength, tsf												
	NUMBER	INTERVAL AND TYPE	ADVANCED / RECOVERED (in)					SV Δ	QP/2 \square	QU/2 \circ	PL	NMC	LL							
-5-	1	SS	18/14		Dark Brown Silty CLAY w/Sand Trace Gravel, CL	6-11-13														
-10-	2	SS	18/12		Brown Sandy GRAVEL Trace Clay, Silt, GC-GP	11-9-7														
-15-	3	SS	18/12			5-7-8														
-20-	4	SS	18/12			5-5-10														
-25-	5	SS	18/14		Gray Medium-Coarse SAND w/Fine, SP	5-6-9														
-30-	6	SS	18/0			11-15-18														
-35-	7	SS	18/12		Brown Fine SAND w/Silt Trace Clay, SM	3-10-10														

DRILLING METHOD Casing Advancer & NW
 DATE DRILLED 11/16-17/84
 DRILLED BY Maniaci
 LOGGED BY Hebel/Maxiner
 PIEZOMETER Yes

GROUNDWATER LEVELS
 Encountered at _____ Feet
 _____ Hours after completion _____ Feet
 _____ after completion _____ Feet
 _____ after completion _____ Feet

NOTE: Refer to the attached GENERAL NOTES and NOTATION USED ON RECORDS OF SUBSURFACE EXPLORATION for abbreviations, explanations, and qualifications relative to this log.



John Mathes & Associates, Inc.

RECORD OF SUBSURFACE EXPLORATION

PROJECT I. P. Hennepin, Hydrogeologic Investigation
 JOB NO. 04-1934

BORING E-8B Renamed 08
 SHEET 2 OF 2

DEPTH (ft)	SAMPLE		SEE REMARK #	DESCRIPTION OF MATERIALS (Color Modifier MATERIAL. Classification) Soil Classification System <u>Unified</u> Surface Elevation <u>498.7'</u>	BLOWS (per 6 in)	DRY UNIT WEIGHT (pcf)	Shear Strength, tsf													
	NUMBER	INTERVAL AND TYPE					ADVANCED / RECOVERED (in)	SVΔ	QP/2□	QU/2○	PL	NMC	LL							
40	8	SS	18/14		Brown Fine SAND w/Silt Trace Clay, SM	3-7-9														
45	9	SS	18/16		-w/Gravel @ 43.0'	4-7-10														
50	10	SS	18/14			12-10-12														
55	11	SS	18/10		-Trace Gravel @ 53.0'	5-8-11														
60	12	SS	18/10		Brown Sandy GRAVEL w/Silt, Clay, GC-GM	25-30-33														
65					TOB															
70																				

DRILLING METHOD Casing Advancer & NW
 DATE DRILLED 11/16-17/84
 DRILLED BY Maniaci
 LOGGED BY Hebel/Maxeiner
 PIEZOMETER Yes

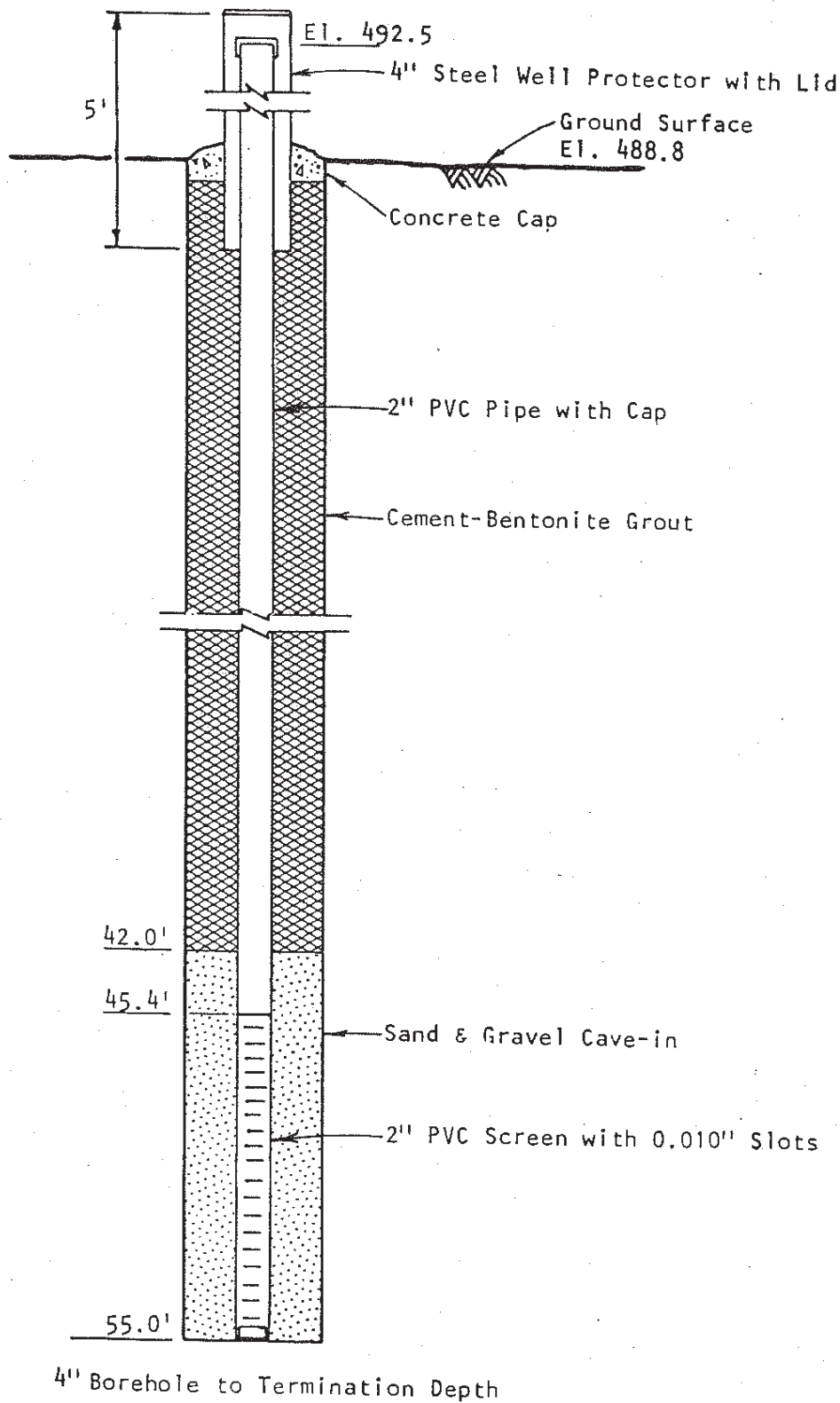
GROUNDWATER LEVELS
 Encountered at _____ Feet
 _____ Hours after completion _____ Feet
 _____ after completion _____ Feet
 _____ after completion _____ Feet

NOTE: Refer to the attached GENERAL NOTES and NOTATION USED ON RECORDS OF SUBSURFACE EXPLORATION for abbreviations, explanations, and qualifications relative to this log.



John Mathes & Associates, Inc.

**APPENDIX A
BORING LOGS AND WELL CONSTRUCTION LOGS
MATHES WELL CONSTRUCTION LOGS**



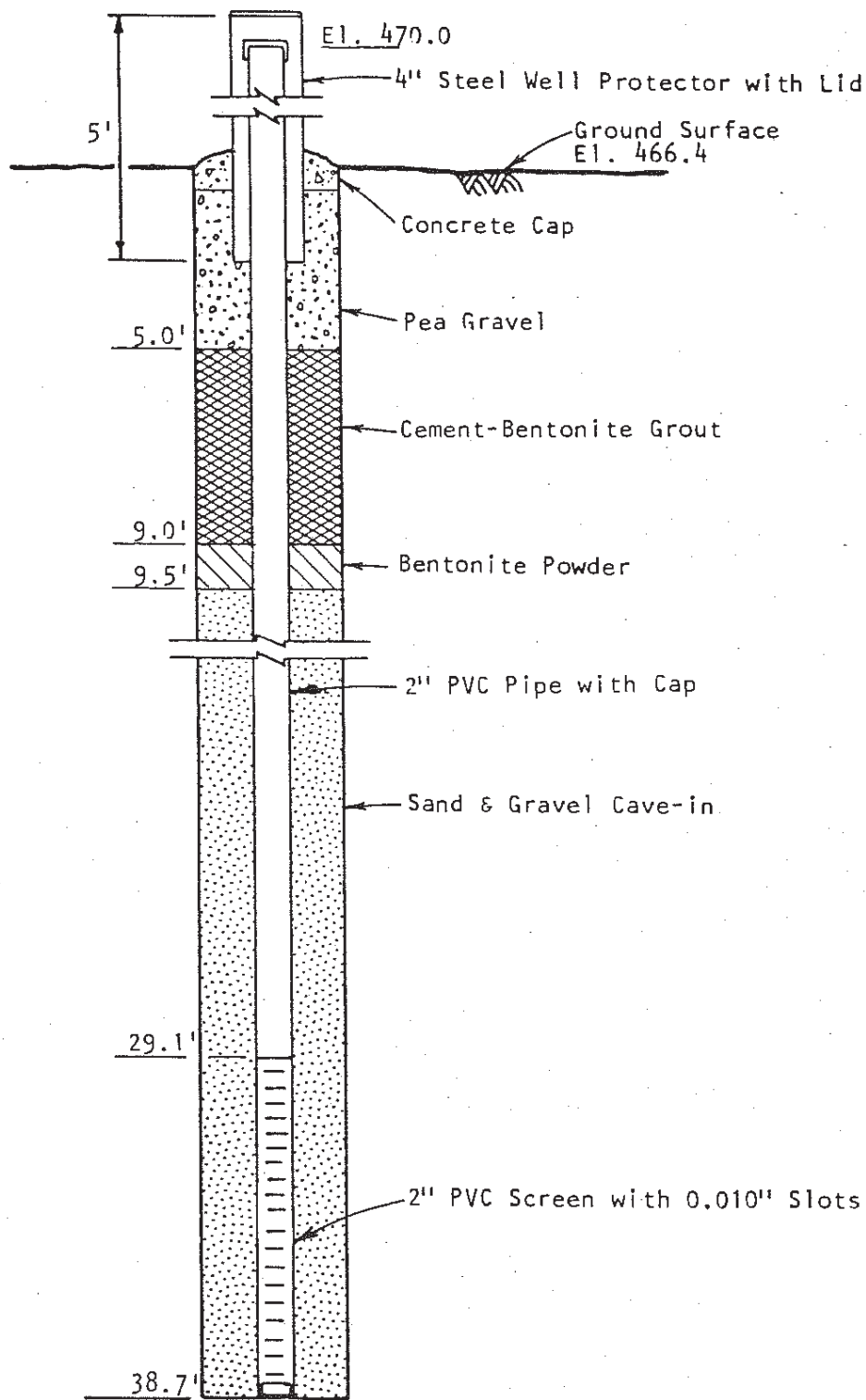
Not to Scale



John Mathes & Associates, Inc.

PIEZOMETER E-2
 Renamed 02

PLATE 10



6" Borehole to Termination Depth

Not to Scale

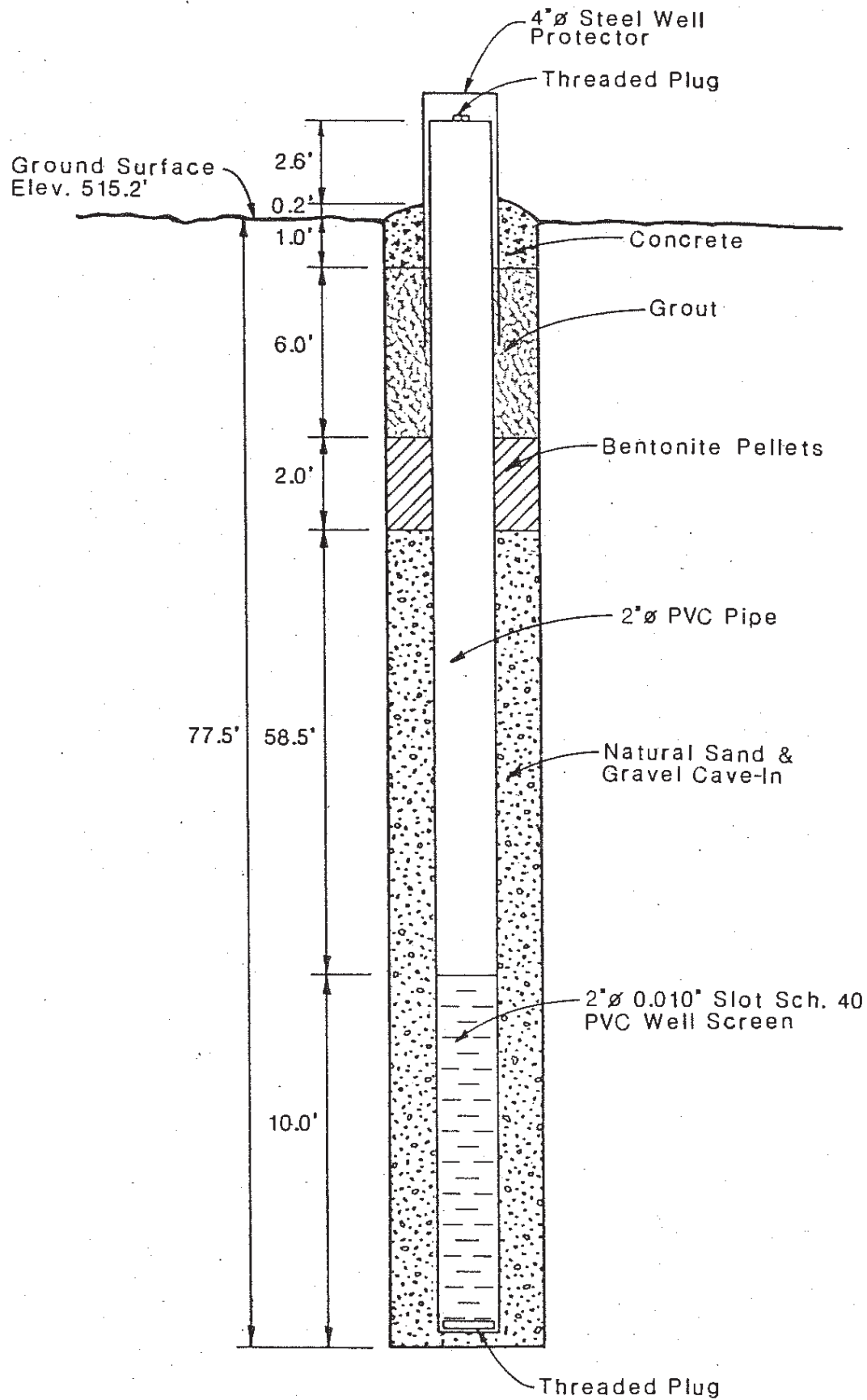


John Mathes & Associates, Inc.

PIEZOMETER E-6

Renamed 06

PLATE 14

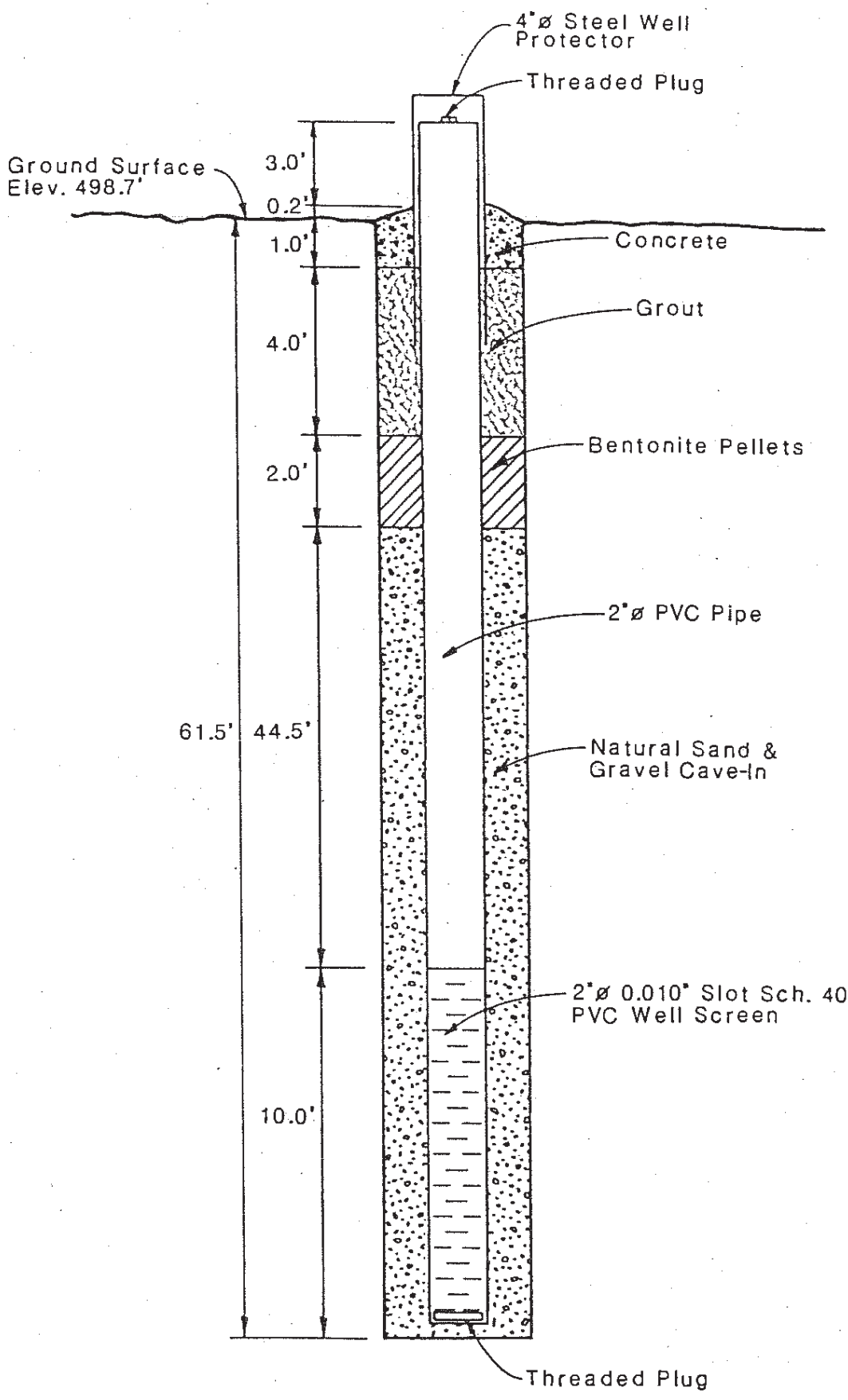


Not To Scale



John Mathes & Associates, Inc.

Renamed 07
PIEZOMETER E-7



Not To Scale



Renamed 08
PIEZOMETER E-8B

John Mathes & Associates, Inc.

**APPENDIX A
BORING LOGS AND WELL CONSTRUCTION LOGS
NRT BORING LOGS**



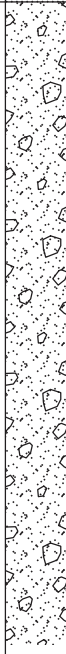



Facility/Project Name Hennepin Power Station - New East Ash Landfill		License/Permit/Monitoring Number		Boring Number 03R	
Boring Drilled By: Name of crew chief (first, last) and Firm Randy Redke Cascade		Date Drilling Started 1/15/2015		Date Drilling Completed 1/15/2015	
Common Well Name 03R		Final Static Water Level 447.8 Feet (NAVD88)		Surface Elevation 479.4 Feet (NAVD88)	
				Borehole Diameter 6.0 inches	
Local Grid Origin <input type="checkbox"/> (estimated: <input checked="" type="checkbox"/>) or Boring Location <input checked="" type="checkbox"/>		State Plane 1,690,297 N, 2,532,308 E S/C/N		Local Grid Location <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W	
1/4 of 1/4 of Section , T N, R		Lat _____ ' _____ "		Long _____ ' _____ "	
Facility ID		County Putnam		State IL	
				Civil Town/City/ or Village Hennepin	

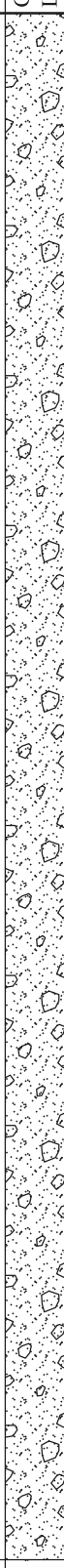
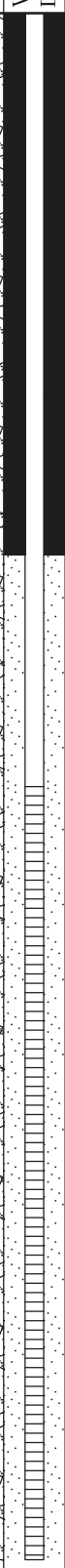
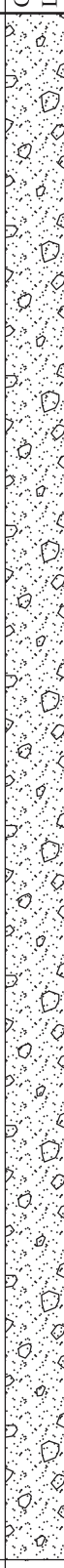
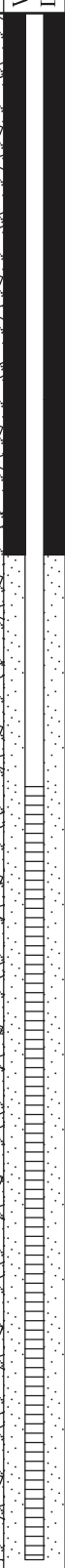
Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
								Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
1	30 30		0 - 5.8'	FILL, SILTY CLAY CL/ML, with gravel and some sand.									
2	30 26		5.8 - 23.9'	FILL, ASH (Coal): ASH (Coal), trace silt and gravel, dark gray, medium dense.	(FILL) CL/ML								
3	120 93												

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature 	Firm Natural Resource Technology 234 W. Florida St., Fifth Floor, Milwaukee, WI 53204	Tel: (414) 837-3607 Fax: (414) 837-3608
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Sample		Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)							Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
4	120 96		13	5.8 - 23.9' FILL, ASH (Coal): ASH (Coal), trace silt and gravel, dark gray, medium dense. <i>(continued)</i>									
			14										
			15										
			16										
			17										
			18										
			19										
			20										
			21										
			22										
			23										
			24										
		5	60 44						25	23.9 - 52' POORLY-GRADED SAND WITH GRAVEL: (SP)g, fine grained sized gravel, trace silt, light brown, loose, dry.			
	26												
	27												
	28												
	29												
	30												
	31												
6	60 54		32										

31.6' Wet.

Sample		Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)							Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
7	120 69		33	23.9 - 52' POORLY-GRADED SAND WITH GRAVEL: (SP)g, fine grained sized gravel, trace silt, light brown, loose, dry. <i>(continued)</i>									
			34										
			35										
			36										
			37										
			38										
			39										
			40										
			41										
			42										
8	84 36		43	(SP)g									
			44										
			45										
			46										
			47										
			48										
			49										
			50										
			51										
			52										



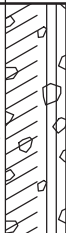

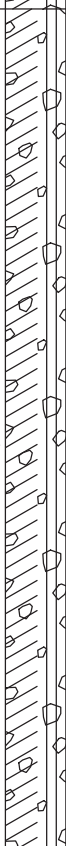
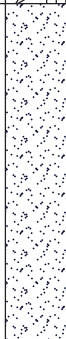
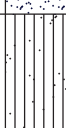

SOIL BORING LOG INFORMATION

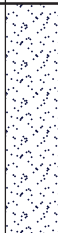







Facility/Project Name Hennepin Power Station - New East Ash Landfill		License/Permit/Monitoring Number		Boring Number 04R	
Boring Drilled By: Name of crew chief (first, last) and Firm Randy Redke Cascade		Date Drilling Started 1/13/2015		Date Drilling Completed 1/13/2015	
Common Well Name 04R		Final Static Water Level 453.8 Feet (NAVD88)		Surface Elevation 483.8 Feet (NAVD88)	
				Borehole Diameter 6.0 inches	
Local Grid Origin <input type="checkbox"/> (estimated: <input checked="" type="checkbox"/>) or Boring Location <input checked="" type="checkbox"/>		Lat _____ ' _____ "		Local Grid Location	
State Plane 1,690,677 N, 2,534,367 E S/C/N		Long _____ ' _____ "		<input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W	
1/4 of _____ 1/4 of Section _____, T _____ N, R _____		Facility ID		County Putnam	
		State IL		Civil Town/City/ or Village Hennepin	

Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
								Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
1	60 42		0 - 15'	FILL, SILTY CLAY CL/ML, with small to large gravel, dark brown, low plasticity, loose, dry.									
2	60 40		5 - 10'		(FILL) CL/ML								
3	60 32		10.5' - 12'	Ash begins to grade in, more rounded gravel.									

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature	Firm Natural Resource Technology 234 W. Florida St., Fifth Floor, Milwaukee, WI 53204	Tel: (414) 837-3607 Fax: (414) 837-3608
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Sample		Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)							Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
4	120 72		13	0 - 15' FILL, SILTY CLAY CL/ML, with small to large gravel, dark brown, low plasticity, loose, dry. (continued)	(FILL) CL/ML								
			15	15 - 25.6' SILTY CLAY CL/ML, little gravel and fine grained sand, dark brown, low plasticity, dry.	CL/ML								
5	60 48		26	25.6 - 30' POORLY-GRADED SAND: SP, fine grained sand, little rounded gravel, trace silt, brown, loose, dry.	SP								
6	120 48		30	30 - 31.5' SILT WITH SAND: (ML)s, fine grained sand, little rounded gravel, brown, wet.	(ML)s								
			32		SP								

Sample		Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)							Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
7	132 80		31.5 - 35'	POORLY-GRADED SAND: SP, fine grained sand, some rounded gravel, little silt. <i>(continued)</i>	SP								
			35 - 40'	No recovery, a large granitic cobble stuck in sampler and pushed soil sample to 40'.									
			40 - 49.9'	WELL-GRADED GRAVEL: GW, subrounded gravel, some silt, some fine to medium grained sand, brown, loose.	GW								
			49.9 - 51'	SILT: ML, gray, hard, dry.	ML								
			51 - 52'	Blind drilled to 52' for well installation.									



Facility/Project Name Hennepin Power Station - New East Ash Landfill		License/Permit/Monitoring Number		Boring Number 05R	
Boring Drilled By: Name of crew chief (first, last) and Firm Randy Redke Cascade		Date Drilling Started 1/15/2015		Date Drilling Completed 1/15/2015	
Common Well Name 05R		Final Static Water Level Feet (NAVD88)		Surface Elevation 485.6 Feet (NAVD88)	
				Borehole Diameter 6.0 inches	
Local Grid Origin <input type="checkbox"/> (estimated: <input checked="" type="checkbox"/>) or Boring Location <input checked="" type="checkbox"/>		Lat _____ ' _____ "		Local Grid Location	
State Plane 1,690,518 N, 2,533,196 E S/C/N		Long _____ ' _____ "		<input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W	
1/4 of _____ 1/4 of Section _____, T _____ N, R _____		Facility ID		County Putnam	
		State IL		Civil Town/City/ or Village Hennepin	

Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
								Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
			0 - 55'	See boring 05DR for details.									
			1										
			2										
			3										
			4										
			5										
			6										
			7										
			8										
			9										
			10										
			11										
			12										

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature 	Firm Natural Resource Technology 234 W. Florida St., Fifth Floor, Milwaukee, WI 53204	Tel: (414) 837-3607 Fax: (414) 837-3608
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Sample			Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)	Blow Counts						Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
			13	0 - 55' See boring 05DR for details. <i>(continued)</i>									
			14										
			15										
			16										
			17										
			18										
			19										
			20										
			21										
			22										
			23										
			24										
			25										
			26										
			27										
			28										
			29										
			30										
			31										
			32										



Sample			Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)	Blow Counts						Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
			33	0 - 55' See boring 05DR for details. <i>(continued)</i>									
			34										
			35										
			36										
			37										
			38										
			39										
			40										
			41										
			42										
			43										
			44										
			45										
			46										
			47										
			48										
			49										
			50										
			51										
			52										



Facility/Project Name Hennepin Power Station - New East Ash Landfill		License/Permit/Monitoring Number		Boring Number 05DR	
Boring Drilled By: Name of crew chief (first, last) and Firm Randy Redke Cascade		Date Drilling Started 1/14/2015		Date Drilling Completed 1/14/2015	
Common Well Name 05DR		Final Static Water Level 454.5 Feet (NAVD88)		Surface Elevation 485.7 Feet (NAVD88)	
				Borehole Diameter 6.0 inches	
Local Grid Origin <input type="checkbox"/> (estimated: <input checked="" type="checkbox"/>) or Boring Location <input checked="" type="checkbox"/>		State Plane 1,690,517 N, 2,533,190 E S/C/N		Local Grid Location	
1/4 of 1/4 of Section , T N, R		Lat _____ ' _____ "		<input type="checkbox"/> N <input type="checkbox"/> E	
		Long _____ ' _____ "		Feet <input type="checkbox"/> S Feet <input type="checkbox"/> W	
Facility ID		County Putnam		State IL	
				Civil Town/City/ or Village Hennepin	





Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
								Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
1	60 40		0 - 10'	FILL, LEAN CLAY: CL, with some sand, rounded to subrounded gravel, light brown to dark brown.									
2	60 24		5 - 10'		(FILL) CL								
3	120 40		10 - 22'	FILL, ASH (Coal): ASH (Coal), fine grained sand sized particles, dark gray, loose, wet.	(FILL) ASH (Coal)								

I hereby certify that the information on this form is true and correct to the best of my knowledge.







Signature 	Firm Natural Resource Technology 234 W. Florida St., Fifth Floor, Milwaukee, WI 53204	Tel: (414) 837-3607 Fax: (414) 837-3608
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Sample		Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)							Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
6	108 96		33	28.2 - 72.7' WELL-GRADED GRAVEL WITH SAND: (GW)s, coarse grained sand, little silt, light brown, loose, dry. (continued)									
			34										
			35										
			36										
			37										
			38										
			39										
			40										
			41										
			42										
7	120 86		43	(GW)s									
			44										
			45										
			46										
			47										
			48										
			49										
			50										
			51										
			52										



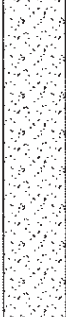









Sample			Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)	Blow Counts						Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
8	60 40		53	28.2 - 72.7' WELL-GRADED GRAVEL WITH SAND: (GW)s, coarse grained sand, little silt, light brown, loose, dry. <i>(continued)</i>									
			54										
			55										
			56										
			57										
			58										
			59										
			60										
9	180 144		60		(GW)s								
			61										
			62										
			63										
			64										
			65										
			66										
			67										
			68										
			69										
			70										
			71										
72													

Facility/Project Name Hennepin Power Station - New East Ash Landfill		License/Permit/Monitoring Number		Boring Number 08D	
Boring Drilled By: Name of crew chief (first, last) and Firm Mike Hansen Boart Longyear Company		Date Drilling Started 4/16/2009		Date Drilling Completed 4/17/2009	
Common Well Name 08D		Final Static Water Level 448.4 Feet (Site)		Surface Elevation 499.2 Feet (Site)	
				Borehole Diameter 6.0 inches	
Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/>) or Boring Location <input type="checkbox"/>		Lat _____ ° _____ ' _____ "		Local Grid Location	
State Plane 1,688,932 N, 2,533,463 E S/C/N		Long _____ ° _____ ' _____ "		<input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W	
1/4 of _____ 1/4 of Section _____, T _____ N, R _____		Feet _____		Feet _____	
Facility ID		County		State IL	
				Civil Town/City/ or Village Hennepin	

Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties						RQD/ Comments
								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200		
CS	60 60		2.5	0 - 7' FILL, SILTY SAND: SM, very dark brown (7.5YR 2.5/3), well graded, mostly sand [mostly fine, little coarse], few gravel [mostly fine], some silt, moist.	(FILL) SM									Relative Density by visual inspection, not SPT
CS	120 120		7.5	7 - 15' FILL, WELL-GRADED SAND WITH GRAVEL: (SW)g, brown (7.5YR 4/4), well graded, mostly sand [mostly medium, few coarse], some gravel [mostly fine], moist, trace brick pieces.	(FILL) (SW)g									
CS	120 120		15.0	15 - 40' FILL, POORLY-GRADED SAND: SP, yellowish brown (10YR 5/4), poorly graded, mostly sand [mostly medium, trace coarse], few subangular gravel [mostly coarse], moist, loose.	(FILL) SP									
CS	120 120		25.0											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

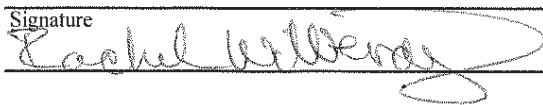
Signature 	Firm Natural Resource Technology, Inc. 23713 W. Paul Road, St D. Pewaukee, WI 53072	Tel: 262.523.9000 Fax: 262.532.9001
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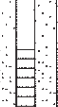


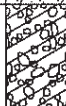

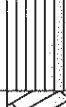

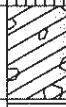

Sample		Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Alt. & Recovered (in)							Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
CS	120 120		32.5	15 - 40' FILL, POORLY-GRADED SAND: SP, yellowish brown (10YR 5/4), poorly graded, mostly sand [mostly medium, trace coarse], few subangular gravel [mostly coarse], moist, loose. (continued)	(FILL) SP								
			35.0										
CS	120 120		40.0	40 - 52' FILL, POORLY-GRADED SAND: SP, yellowish brown (10YR 5/4), poorly graded, mostly sand [mostly medium], few silt, moist, trace bottom ash, loose.	(FILL) SP								
			42.5	46' wet.									
CS	120 0		52.5	52 - 55' CLAYEY SAND: SC, yellowish brown (10YR 5/4), well graded, mostly sand [mostly medium, little coarse], few gravel [mostly coarse], some clay.	SC								
			55.0	55 - 65' No Recovery. Some black fine sand on outside of core barrel, possible peat.									
CS	120 120		65.0	65 - 66' CLAYEY GRAVEL: GC, dark yellowish brown (10YR 4/6), high plasticity, mostly gravel [mostly fine, few coarse], some clay.	GC								
			67.5	66 - 67' WELL-GRADED SAND: SW, dark brown (10YR 3/3), well graded, mostly sand [mostly medium].				SW					
CS	120 120		70.0	67 - 83' WELL-GRADED GRAVEL WITH CLAY AND SAND: (GW-GC)s, yellowish brown (10YR 5/6), well graded, some sand [mostly medium], mostly gravel [mostly fine, few coarse], little clay.	(GW-GC)s								
			75.0	75' 12-inch medium sand seam.									

Facility/Project Name Hennepin Power Station - New East Ash Landfill		License/Permit/Monitoring Number		Boring Number 18D	
Boring Drilled By: Name of crew chief (first, last) and Firm Mike Hansen Boart Longyear Company		Date Drilling Started 4/14/2009		Date Drilling Completed 4/14/2009	
Common Well Name 18D		Final Static Water Level 451.3 Feet (Site)		Surface Elevation 485.2 Feet (Site)	
				Borehole Diameter 6.0 inches	
Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/>) or Boring Location <input type="checkbox"/>		Lat _____ ° _____ ' _____ "		Local Grid Location	
State Plane 1,690,429 N, 2,532,742 E S/C/N		Long _____ ° _____ ' _____ "		<input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W	
1/4 of _____ 1/4 of Section _____, T _____ N, R _____		State IL		Civil Town/City/ or Village Hennepin	

Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	Soil Properties						RQD/ Comments
								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200		
CS	60 60		1.5	0 - 2' FILL, WELL-GRADED SAND WITH SILT: SW-SM, strong brown (7.5YR 4/6), well graded, mostly sand [mostly medium, few coarse], trace subrounded gravel [mostly medium], some silt, moist.	(FILL) SW-SM									Relative Density by visual inspection, not SPT
			3.0	2 - 4.5' FILL, WELL-GRADED SAND: SW, dark gray (2.5Y 4/1), well graded, mostly sand [trace fine, little medium, mostly coarse], some gravel [mostly medium], very dense.	(FILL) SW									
CS	120 120		4.5	4.5 - 10' FILL, WELL-GRADED GRAVEL WITH SAND: (GW)s, strong brown (7.5YR 4/6), well graded, some sand [some medium, few coarse], mostly gravel [mostly medium, little coarse], trace clay, dry, medium dense.	(FILL) (GW)s									
			10.5	10 - 15' FILL, WELL-GRADED SAND WITH SILT: SW-SM, very dark brown (2.5Y 2.5/1), 50% dark olive brown (2.5Y 3/3) mottling, well graded, mostly sand [mostly fine, little coarse], few gravel [mostly medium], some silt, trace bottom ash.	(FILL) SW-SM									
CS	120 120		15.0	15 - 17' POORLY-GRADED GRAVEL: GP, poorly graded, mostly gravel [mostly coarse], with limestone cobbles (2 - 4 inches diameter).	GP									
			18.0	17 - 22' WELL-GRADED SAND WITH GRAVEL: (SW)g, very dark grayish brown (2.5Y 3/2), well graded, mostly sand [mostly fine, few coarse], little gravel [mostly medium], moist, medium dense.	(SW)g									
			19.5											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

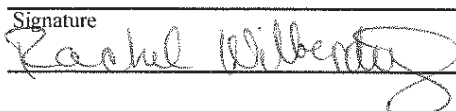
Signature 	Firm Natural Resource Technology, Inc. 23713 W. Paul Road, St D. Pewaukee, WI 53072	Tel: 262.523.9000 Fax: 262.532.9001
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Sample		Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments	
Number and Type	Length Alt. & Recovered (in)							Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200		
CS	120 120		54.0	45 - 58' WELL-GRADED GRAVEL WITH CLAY: GW-GC, yellowish brown (10YR 5/4), very soft, well graded, mostly subrounded gravel [mostly fine, few coarse], little clay, wet, trace cobbles. (continued)	GW-GC								grain size @ 55'	
			55.5											
			57.0											
			58.5	58 - 62' LEAN CLAY: CL, yellowish brown (10YR 5/4), medium toughness, medium plasticity, firm, laminated, PP = 1.5.	CL								PP = Pocket Pen	
			60.0											
			61.5											
			63.0	62 - 65' WELL-GRADED GRAVEL WITH CLAY: GW-GC, yellowish brown (10YR 5/4), very soft, well graded, mostly subrounded gravel [mostly fine, few coarse], little clay, wet, trace cobbles.	GW-GC									
CS	120 120		64.5											
			66.0											
			67.5	65 - 70' LEAN CLAY: CL, dark gray (2.5Y 4/1), medium toughness, medium to high plasticity, soft, PP = 0.5.	CL									
			69.0											
			70.5	70 - 72.5' POORLY-GRADED SAND: SP, dark gray (2.5Y 4/1), poorly graded, mostly sand [mostly fine], wet.	SP									
			72.0											
			73.5	72.5 - 75' POORLY-GRADED SAND: SP, yellowish brown (10YR 5/4), poorly graded, mostly sand [mostly medium].	SP									
CS	120 120		75.0											
			76.5											
			78.0	75 - 82' CLAYEY GRAVEL: GC, dark yellowish brown (10YR 3/4), well graded, little sand [mostly coarse], mostly subrounded gravel [mostly medium], some clay, dense.	GC								grain size @ 77'	
			79.5											
			81.0	80' gray (N 5/), Dolomite Boulder.										
			82.5	82 - 84' SILT: ML, gray (N 5/), dry, medium dense.	ML									
			84.0											
CS	120 120		85.5	84 - 86' LEAN CLAY WITH GRAVEL: (CL)g, gray (N 5/), some gravel [mostly coarse], dense, Till.	(CL)g									

Facility/Project Name Hennepin Power Station - New East Ash Landfill		License/Permit/Monitoring Number		Boring Number 18S	
Boring Drilled By: Name of crew chief (first, last) and Firm Mike Hansen Boart Longyear Company		Date Drilling Started 4/14/2009		Date Drilling Completed 4/15/2009	
Common Well Name 18S		Final Static Water Level 450.7 Feet (Site)		Surface Elevation 485.2 Feet (Site)	
Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/>) or Boring Location <input type="checkbox"/>		Borehole Diameter 6.0 inches		Drilling Method sonic	
State Plane 1,690,428 N, 2,532,740 E S/C/N		Lat _____"		Local Grid Location <input type="checkbox"/> N <input type="checkbox"/> E	
1/4 of 1/4 of Section , T N, R		Long _____"		Feet <input type="checkbox"/> S Feet <input type="checkbox"/> W	
Facility ID		County		State IL	
				Civil Town/City/ or Village Hennepin	

Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties						RQD/ Comments	
								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200			
			0 - 2'	SW-SM, Blind Drilled to 52'. See log for 18D.	(FILL) SW-SM										
			2 - 4.5'	SW.	(FILL) SW										
			4.5 - 10'	(GW)s.	(FILL) (GW)s										
			10 - 15'	SW-SM.	(FILL) SW-SM										
			15 - 17'	GP.	GP										
			17 - 22'	(SW)g.	(SW)g										
			22 - 32'	SW.	SW										

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature 	Firm Natural Resource Technology, Inc. 23713 W. Paul Road, St D. Pewaukee, WI 53072	Tel: 262.523.9000 Fax: 262.532.9001
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Facility/Project Name Hennepin Power Station - New East Ash Landfill		License/Permit/Monitoring Number		Boring Number 19D	
Boring Drilled By: Name of crew chief (first, last) and Firm Mike Hansen Boart Longyear Company		Date Drilling Started 4/15/2009		Date Drilling Completed 4/15/2009	
Common Well Name 19D		Final Static Water Level 450.8 Feet (Site)		Surface Elevation 483.9 Feet (Site)	
Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/>) or Boring Location <input type="checkbox"/>		State Plane 1,690,632 N, 2,533,812 E S/C/N		Local Grid Location <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W	
1/4 of Section , T N, R		Lat _____ ' _____ "		Long _____ ' _____ "	
Facility ID		County		State IL	
				Civil Town/City/ or Village Hennepin	

Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments	
								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200		
CS	60 60		0-2	0 - 10' FILL, WELL-GRADED GRAVEL WITH CLAY AND SAND: (GP-GC)s, dark yellowish brown (10YR 4/4), well graded, some sand [few medium, mostly coarse], mostly gravel [mostly fine, trace coarse], little clay.										Relative Density by visual inspection, not SPT
CS	120 120		2-4	4' 5 - 10% bottom ash to 5'.	(FILL) (GP-GC)s									
			4-10	10 - 14' FILL, WELL-GRADED SAND: SW, dark yellowish brown (10YR 3/6), 35% black) mottling, well graded, mostly sand [mostly fine], some bottom ash.	(FILL) SW									
CS	120 120		10-14	14 - 17' FILL, ASH (Coal): ASH (Coal), fine grained, gray.	(FILL) ASH (Coal)									
			14-18	17 - 30' FILL, POORLY-GRADED SAND: SP, dark yellowish brown (10YR 3/6), poorly graded, mostly sand [mostly fine, few coarse], moist, trace bottom ash, cohesive.	(FILL) SP									

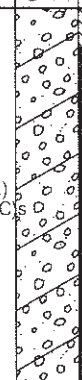

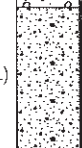

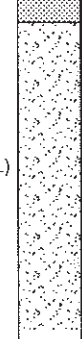
I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature
Rachel Wilberding


Firm Natural Resource Technology, Inc.
23713 W. Paul Road, St D. Pewaukee, WI 53072

Tel: 262.523.9000
Fax: 262.532.9001

Facility/Project Name Hennepin Power Station - New East Ash Landfill		License/Permit/Monitoring Number		Boring Number 19S	
Boring Drilled By: Name of crew chief (first, last) and Firm Mike Hansen Boart Longyear Company		Date Drilling Started 4/16/2009		Date Drilling Completed 4/16/2009	
Common Well Name 19S		Final Static Water Level 450.6 Feet (Site)		Surface Elevation 483.9 Feet (Site)	
Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/>) or Boring Location <input type="checkbox"/>		Borehole Diameter 6.0 inches		Drilling Method sonic	
State Plane 1,690,631 N, 2,533,810 E S/C/N		Lat _____ "		Local Grid Location <input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W	
1/4 of _____ 1/4 of Section _____, T _____ N, R _____		Long _____ "		Feet _____ Feet _____	
Facility ID		County		State IL	
				Civil Town/City/ or Village Hennepin	

Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties						RQD/ Comments
								Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200		
			0 - 10'	(GW-GC)s, Blind drilled to 52'. See log for 19D.										
			10 - 14'	SW.										
			14 - 17'	ASH (Coal).										
			17 - 30'	SP.										

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature 	Firm Natural Resource Technology, Inc. 23713 W. Paul Road, St D. Pewaukee, WI 53072	Tel: 262.523.9000 Fax: 262.532.9001
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Template: SOIL BORING - Project: 1940 GINT.GPJ



Facility/Project Name Hennepin Power Station - New East Ash Landfill		License/Permit/Monitoring Number		Boring Number 40S	
Boring Drilled By: Name of crew chief (first, last) and Firm Jerry Hancock PSC Drilling		Date Drilling Started 10/25/2010		Date Drilling Completed 10/26/2010	
Common Well Name 40S		Final Static Water Level 473.8 Feet (Site)		Surface Elevation 485.8 Feet (Site)	
				Borehole Diameter 8.3 inches	
Local Grid Origin <input type="checkbox"/> (estimated: <input checked="" type="checkbox"/>) or Boring Location <input checked="" type="checkbox"/>		State Plane 1,690,567 N, 2,533,492 E S/C/N		Local Grid Location	
1/4 of _____ 1/4 of Section _____, T _____ N, R _____		Lat _____° _____' _____"		<input type="checkbox"/> N <input type="checkbox"/> E <input type="checkbox"/> S <input type="checkbox"/> W	
Facility ID		County		State	
		IL		Civil Town/City/ or Village Hennepin	

Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID 10.6 eV Lamp	Soil Properties					RQD/ Comments	
									Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200		
1 CS	60 42		1	0 - 10.5' FILL, WELL-GRADED GRAVEL WITH SAND: (GW)s, brown (7.5YR 5/4), well graded, dry, Gravel is composed of lithics (granite and dolomite). 16-30% lean clay.											
2 CS	60 42		5	(FILL) (GW)s											10-15 ft. dense. A lot of hammer blows
3 CS	60 60		11	10.5 - 28' FILL, ASH (Coal): ASH (Coal), black (5YR 2.5/1), dry, Coarse like bottom ash to 15 ft.	(FILL) ASH (Coal)										15-20 ft. softer. Few hammer blows

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature	Firm Natural Resource Technology	Tel:
		Fax:

Facility/Project Name Hennepin Power Station		License/Permit/Monitoring Number		Boring Number 45S	
Boring Drilled By: Name of crew chief (first, last) and Firm Chad Dutton Bulldog Drilling		Date Drilling Started 6/23/2015		Date Drilling Completed 6/24/2015	
Common Well Name 45S		Final Static Water Level Feet (NAVD88)		Surface Elevation 465.70 Feet (NAVD88)	
				Borehole Diameter 8.3 inches	
Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/>) or Boring Location <input checked="" type="checkbox"/>			Local Grid Location		
State Plane 1,689,993.67 N, 2,531,896.69 E <input checked="" type="checkbox"/> E/W			Lat <u>41° 18' 13.503"</u> <input type="checkbox"/> N <input type="checkbox"/> E		
1/4 of <u> </u> 1/4 of Section <u> </u> , T <u> </u> N, R <u> </u>			Long <u>-89° 18' 36.702"</u> <input type="checkbox"/> S <input type="checkbox"/> W		
Facility ID		County Putnam		State Illinois	
				Civil Town/City/ or Village Hennepin	

Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
								Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
1 SS	24 20	2 5 4 3	0-0.5	0 - 2.5' SILT: ML , very dark grayish brown (10YR 3/2), mostly silt, some very fine sand, trace roots and gravel, cohesive, nonplastic, dry to moist.	ML	↓ ↓ ↓ ↓ ↓ ↓							
2 SS	24 6	2 10 6 4	2.5-3.0	2.5 - 5' SILT WITH SAND: (ML)s , very dark grayish brown (10YR 3/2) to dark reddish gray (5YR 4/2), trace clay.	(ML)s	↓ ↓ ↓ ↓ ↓ ↓							
3 ST	18 17.5		5.0-5.5	5 - 6.5' Shelby Tube.									ST3: 18" at 550 lbs of pressure.
			6.5-7.0	6.5 - 7.5' SILT WITH SAND: (ML)s , very dark grayish brown (10YR 3/2) to dark reddish gray (5YR 4/2), trace clay.	(ML)s	↓ ↓ ↓ ↓ ↓ ↓							
4 SS	24 18	6 12 20 18	7.5-8.5	7.5 - 10.5' WELL-GRADED SAND WITH GRAVEL: (SW)g , brown (7.5YR 4/3), subangular gravel, trace clay, moist, top 2" of unit is fine poorly-graded sand. 8.2" thin layer of black material.	(SW)g	↓ ↓ ↓ ↓ ↓ ↓							
5 SS	24 16	7 3 3	10.0-10.5										

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature 	Firm Natural Resource Technology 234 W. Florida St., Fifth Floor, Milwaukee, WI 53204	Tel: (414) 837-3607 Fax: (414) 837-3608
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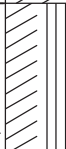



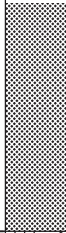





SOIL BORING LOG INFORMATION











Facility/Project Name Hennepin Power Station		License/Permit/Monitoring Number		Boring Number 46	
Boring Drilled By: Name of crew chief (first, last) and Firm Jason Drabek Cascade Drilling		Date Drilling Started 8/11/2015		Date Drilling Completed 8/11/2015	
Common Well Name 46		Final Static Water Level Feet (NAVD88)		Surface Elevation 496.44 Feet (NAVD88)	
				Borehole Diameter 6.0 inches	
Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/>) or Boring Location <input checked="" type="checkbox"/>		State Plane 1,690,085.24 N, 2,533,743.42 E <input checked="" type="checkbox"/> E/W		Local Grid Location	
1/4 of 1/4 of Section , T N, R		Lat 41° 18' 14.23"		<input type="checkbox"/> N <input type="checkbox"/> E	
		Long -89° 18' 12.5"		<input type="checkbox"/> S <input type="checkbox"/> W	
Facility ID		County Putnam		State Illinois	
				Civil Town/City/ or Village Hennepin	

Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments	
								Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200		
1 CS	60 41.5		0 - 5'	FILL, TOPSOIL: GM, dark yellowish brown (10YR 4/4), mostly fine to coarse gravel, silt (<50%), roots (<10%).										
			1 - 2'	ash (30-50%).	(FILL) GM									
			3' - 3.5'	fine to coarse gravel layer.										
2 CS	60 42		5 - 11'	FILL, SILT: ML, yellowish brown (10YR 5/8) mottling, fine to coarse gravel (<40%), clay (<20%), ash (5-15%), ash content increases with depth, dry.										
			10' - 11'	10' decrease in fine gravel content (<10%), decrease in ash content (<10%), increase in clay content with depth, low plasticity, moist.	(FILL) ML									
3 CS	30 30		11 - 12.5'	FILL, ASH (Coal): very dark brown (10YR 2/2), clay (30-50%), fine gravel (5-15%), low plasticity, moist.	(FILL)									

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature <i>Andrea Lalus</i>	Firm Natural Resource Technology 234 W. Florida St., Fifth Floor, Milwaukee, WI 53204	Tel: (414) 837-3607 Fax: (414) 837-3608
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Sample		Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)							Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
4 CS	30 30		13	12.5 - 15' FILL, LEAN CLAY: CL, very dark grayish brown (10YR 3/2), silt-sized ash (30-50%), cobbles (15-30%), fine subrounded gravel (10-15%), very fine sand (10-15%), trace silt-sized ash, medium plasticity, cohesive, wet.	(FILL) CL								
			14										
5 CS	60 58		15	14.8' wood fragments (5-15%). 15 - 18' FILL, SILTY CLAY CL/ML, very dark gray (10YR 3/1), fine gravel (5-10%), very fine sand (10-15%), cohesive, medium plasticity, soft, wet. 16' - 16.5' dark brown (10YR 3/3). 16.5' - 17.0' mostly silt [very soft, wet].	(FILL) CL/ML								
			16										
			17										
			18										
6 CS	60 60		18	18 - 19.9' FILL, CLAYEY SILT ML/CL, pale brown (10YR 6/3), fine to coarse angular gravel (>15%), fine sand (10-20%), dry.	(FILL) ML/CL								
			19										
			20										
7 CS	60 60		20	20 - 23' FILL, ASH (Coal): very dark brown (10YR 2/2), clay to silt-sized ash, wood fragments (5-10%), seams of very dark gray (10YR 3/1) material.	(FILL)								
			21										
			22										
			23										
8 CS	60 58		23	23 - 30' CLAYEY SILT ML/CL, very dark grayish brown (10YR 3/2), fine to medium sand (30-50%), subangular to subrounded gravel (>15%), dry. 24' grayish brown (10YR 5/2). 25' cobbles (15-30%).	ML/CL								
			24										
			25										
			26										
			27										
8 CS	60 58		30	30 - 50' WELL-GRADED GRAVEL WITH SAND: (GW)s, grayish brown (10YR 5/2), dark yellowish brown (10YR 4/6), and yellowish brown (10YR 5/8), subangular to subrounded gravel, coarse sand, clay (5-15%), dry.	(GW)s								
			31										
			32										
			33										

Sample		Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)							Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
9 CS	60 23		34	30 - 50' WELL-GRADED GRAVEL WITH SAND: (GW)s, grayish brown (10YR 5/2), dark yellowish brown (10YR 4/6), and yellowish brown (10YR 5/8), subangular to subrounded gravel, coarse sand, clay (5-15%), dry. <i>(continued)</i>									
			35										
			36										
			37										
10 CS	60 54		40	40' clay (5-10%) , clay content increasing with depth, trace silt and very fine sand, moist.	(GW)s								
			41										
			42										
			43										
11 CS	60 54		45	45' increase in clay content (10-15%), trace fine sand.									
			46										
			47										
			48										
12 CS	120 72		48	47.5' - 49.0' pulverized cobble (white, rock flour and gravel-sized fragments).									
			49										
			50										
			51										
			52										
			53										
	54												
			50	50 - 60' WELL-GRADED GRAVEL: GW, subrounded to rounded gravel, clay (15-20%), trace fine sand and silt, wet.	GW								

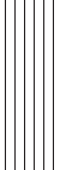
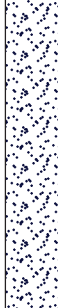
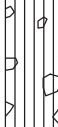

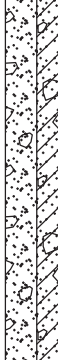



Facility/Project Name Hennepin Power Station		License/Permit/Monitoring Number		Boring Number 47	
Boring Drilled By: Name of crew chief (first, last) and Firm Jason Drabek Cascade Drilling		Date Drilling Started 8/10/2015		Date Drilling Completed 8/10/2015	
Common Well Name 47		Final Static Water Level Feet (NAVD88)		Surface Elevation 502.13 Feet (NAVD88)	
				Borehole Diameter 6.0 inches	
Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/>) or Boring Location <input checked="" type="checkbox"/>		State Plane 1,689,837.69 N, 2,533,052.86 E <input checked="" type="checkbox"/> E/W		Local Grid Location	
1/4 of 1/4 of Section , T N, R		Lat 41° 18' 11.85"		Feet <input type="checkbox"/> N <input type="checkbox"/> E	
		Long -89° 18' 21.579"		Feet <input type="checkbox"/> S <input type="checkbox"/> W	
Facility ID		County Putnam		State Illinois	
				Civil Town/City/ or Village Hennepin	

Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
								Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
1 CS	60 26		0.5	0 - 5' FILL, TOPSOIL: ML, brown (7.5YR 4/2), silt, trace roots, trace angular to subangular gravel dry.		↓							
			1.0	0.7' grayish brown (10YR 5/2), subangular gravel (5-10%).		↓							
			1.5	1' very dark gray (5YR 3/1), trace rounded to subrounded gravel, trace sand-sized ash, dry.		↓							
			2.0			↓							
			2.5		(FILL) ML	↓							
			3.0			↓							
			3.5			↓							
			4.0			↓							
			4.5			↓							
			5.0	5 - 11.5' FILL, ASH (Coal): black (5YR 2.5/1), clay (5-15%), trace subrounded to subangular gravel, moist.		↓							
2 CS	60 43		5.5			↓							
			6.0			↓							
			6.5			↓							
			7.0	7' very dark brown (7.5YR 2.5/2), cohesive, dry to moist.		↓							
			7.5		(FILL)	↓							
			8.0			↓							
			8.5			↓							
			9.0	8.6' increased clay content.		↓							
			9.5			↓							
			10.0			↓							
3 CS	60 32		10.5	10' increase in clay content (15-25%).		↓							

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature 	Firm Natural Resource Technology 234 W. Florida St., Fifth Floor, Milwaukee, WI 53204	Tel: (414) 837-3607 Fax: (414) 837-3608
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Sample		Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)							Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
7 CS	60 60		28.5	21.8 - 30' FILL, SILT: ML, dark gray (10YR 4/1) to very dark brown (7.5YR 2.5/2), clay, trace sand and gravel-sized bottom ash, moist to wet. <i>(continued)</i>	(FILL) ML								
			30.0	30 - 33.5' POORLY-GRADED SAND: SP, light brown (10YR 5/4), clay (5-15%), subrounded gravel (5-10%), dry.	SP								
8 CS	60 18		31.5	31.2' - 33.5' white cobble pulverized by drilling method into angular to subangular gravel-sized pieces, dry.									
			33.5	33.5 - 35' SILT WITH GRAVEL: (ML)g, light brown (10YR 7/3), subangular to subrounded gravel, noncohesive, dry.	(ML)g								
9 CS	60 60		35.0	35 - 40.9' WELL-GRADED GRAVEL: GW, very pale brown (10YR 7/3), gravel and cobbles (50%), sand (10-20%), trace clay.	GW								
			40.0	36.5' cobble (>6" diameter) pulverized by drilling method into gravel-sized, sand-sized, and silt-sized pieces.									
10 CS	60 42		40.0	40' piece of cobble.									
			41.0	40.9 - 45' POORLY-GRADED SAND WITH CLAY AND GRAVEL: (SC)g, sand (20-40%), subangular gravel (25-30%), clay (15-25%).	(SC)g								
			43.7	43.7' - 45' increased clay content.									
			45.0	45 - 55' CLAYEY SILT ML/CL, light brown (10YR 5/4), moist.	ML/CL								



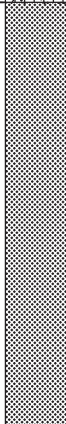

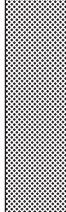






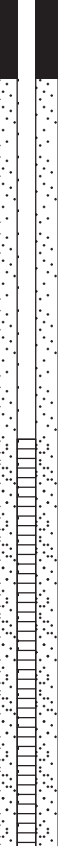
Facility/Project Name Hennepin Power Station		License/Permit/Monitoring Number		Boring Number 48	
Boring Drilled By: Name of crew chief (first, last) and Firm Jason Drabek Cascade Drilling		Date Drilling Started 8/11/2015		Date Drilling Completed 8/11/2015	
Common Well Name 48		Final Static Water Level Feet (NAVD88)		Surface Elevation 485.19 Feet (NAVD88)	
				Borehole Diameter 6.0 inches	
Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/>) or Boring Location <input checked="" type="checkbox"/>		State Plane 1,690,545.64 N, 2,533,337.84 E <input type="checkbox"/> E <input checked="" type="checkbox"/> W		Local Grid Location	
1/4 of 1/4 of Section , T N, R		Lat 41° 18' 18.816"		<input type="checkbox"/> N <input type="checkbox"/> E	
		Long -89° 18' 17.753"		<input type="checkbox"/> S <input type="checkbox"/> W	
Facility ID		County Putnam		State Illinois	
				Civil Town/City/ or Village Hennepin	

Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments	
								Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200		
1 CS	60 60		0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0 5.5 6.0 6.5 7.0 7.5	0 - 1.9' FILL, TOPSOIL: ML, brown (7.5YR 4/2), gravel (5-10%), trace roots, clay, and sand, dry.	(FILL) ML									
				1.9 - 3.4' FILL, SILTY SAND WITH GRAVEL: (SM)g, very pale brown (10YR 7/3), very fine sand, dry.	(FILL) (SM)g									
				3.4 - 7.9' FILL, CLAYEY SILT ML/CL, very dark brown (7YR 2/2), gravel (>15%), cohesive, dry. 4.2' cobbles. 5' - 7.9' decreased cobble content.	(FILL) ML/CL									
2 CS	60 42			6.6' ash seam (2" layer, color changes from gray to reddish brown with depth).										

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature 	Firm Natural Resource Technology 234 W. Florida St., Fifth Floor, Milwaukee, WI 53204	Tel: (414) 837-3607 Fax: (414) 837-3608
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Sample		Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)							Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
3 CS	60 56	8.0	7.9 - 11.4' FILL, SANDY SILT WITH GRAVEL: s(ML)g, silt (>50%), cobbles (20-40%), sand (10-20%), trace clay, noncohesive, dry.	(FILL) s(ML)g									
		8.5											
		9.0											
4 CS	60 55	9.5		(FILL)									
		10.0											
		10.5											
		11.0	11.4 - 23.4' FILL, ASH (Coal): dark gray, (10YR 4/1), cohesive, dry.										
		11.5											
5 CS	60 60	12.0		(FILL)									
		12.5											
		13.0	13' - 13.4' very dark brown (7.5YR 2.5/2).										
		13.5											
		14.0											
		14.5											
		15.0	15' - 20' trace gravel-sized ash.										
15.5													
16.0													
16.5													
17.0	16.9' moist.												
17.5													
18.0													
18.5													
19.0													
19.5													
20.0	20' - 23.4' trace white particles, wet.												
20.5													
21.0													

Sample		Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	U S C S	Graphic Log	Well Diagram	Soil Properties					RQD/ Comments
Number and Type	Length Att. & Recovered (in)							Compressive Strength (tsf)	Moisture Content	Liquid Limit	Plasticity Index	P 200	
8 CS	60 36		34.5	25 - 40.4' FILL, SILTY SAND WITH GRAVEL: (SM)g, very fine sand (30-40%), gravel (20-40%), silt (20-30%), dry. <i>(continued)</i>									
			35.0	35' - 40' clay content increases with depth, iron oxidation.									
			35.5										
			36.0										
			36.5										
			37.0										
			37.5	37.3' wet.									
			38.0										
			38.5										
			39.0										
9 CS	120 78		39.5		(FILL) (SM)g								
			40.0										
			40.5	40.4 - 54' WELL-GRADED GRAVEL: GW, brown (10YR 4/3), gravel (>50%), clay (10-30%), increase in clay content (20-40%) with depth, sand (10-20%).									
			41.0										
			41.5										
			42.0										
			42.5										
			43.0										
			43.5										
			44.0										
	44.5												
	45.0												
	45.5												
	46.0												
	46.5												
	47.0												

**APPENDIX A
BORING LOGS AND WELL CONSTRUCTION LOGS
NRT WELL CONSTRUCTION LOGS**

Illinois Environmental Protection Agency Well Completion Report

SITE #: _____ COUNTY: Putnam WELL #: 03R
 SITE NAME: Hennepin Power Station - Dynegy Midwest Generation BOREHOLE #: _____
 STATE _____
 PLANE _____
 COORDINATE: X 1690299 Y 2532307 (or) LATITUDE: _____ LONGITUDE: _____
 SURVEYED BY: Homer L. Chastain & Associates ILL REGISTRATION #: _____
 DRILLING CONTRACTOR: Cascade Drilling DRILLER: Randy Radke
 CONSULTING FIRM: Natural Resource Technology GEOLOGIST: E. Kazonovitz
 DRILLING METHOD: Sonic DRILLING FLUIDS (TYPE): Water
 LOGGED BY: E. Kazonovitz DATE STARTED: 01/15/15 DATE FINISHED: 01/16/15
 REPORT FORM COMPLETED BY: E. Kazonovitz DATE: 03/26/15

ANNULAR SPACE DETAILS

TYPE OF SURFACE SEAL: Concrete

TYPE OF ANNULAR SEALANT: Grout

INSTALLATION METHOD: Pumped

SETTING TIME: + 24 hours

TYPE OF BENTONITE SEAL-

GRANULAR, PELLET, SLURRY, CHIPS
 (CIRCLE ONE)

INSTALLATION METHOD: Poured

SETTING TIME: ~ 15 minutes

TYPE OF SAND PACK: Quartz

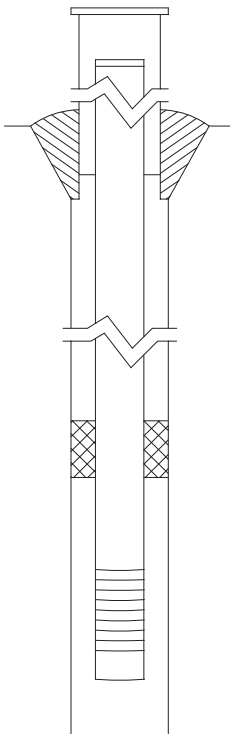
GRAIN SIZE: 40-60 U.S. Standard Series Sieve

INSTALLATION METHOD: Poured

TYPE OF BACKFILL MATERIAL: _____

(IF APPLICABLE)

INSTALLATION METHOD: _____



ELEVATIONS DEPTHS (.01 ft)

(MSL) *	(BGS)	
501.78	-2.6	TOP OF PROTECTIVE CASING
481.92	-2.5	TOP OF RISER PIPE
479.4	0	GROUND SURFACE
478.4	1.0	TOP OF ANNULAR SEALANT
448.4	35.42	STATIC WATER LEVEL (AFTER COMPLETION)
442.4	37.0	TOP OF SEAL
440.4	39.0	TOP OF SANDPACK
437.4	42.0	TOP OF SCREEN
427.4	52	BOTTOM OF SCREEN
427.4	52.0	BOTTOM OF WELL
426.4	53.0	BOTTOM OF BOREHOLE

* REFERENCED TO A NATIONAL GEODETIC VERTICAL DATUM

WELL CONSTRUCTION

MATERIALS

(CIRCLE ONE)

PROTECTIVE CASING	SS304, SS316, PTFE, PVC OR OTHER: <u>Steel</u>
RISER PIPE ABOVE W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
RISER PIPE BELOW W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
SCREEN	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:

CASING MEASUREMENTS

DIAMETER OF BOREHOLE (in.)	6
ID OF RISER PIPE (in)	2
PROTECTIVE CASING LENGTH (ft)	5
RISER PIPE LENGTH (ft)	44.5
BOTTOM OF SCREEN TO END CAP (ft)	0.5
SCREEN LENGTH (1st SLOT TO LAST SLOT) (ft)	10.0
TOTAL LENGTH OF CASING (ft)	NA
SCREEN SLOT SIZE **	0.1

** HAND-SLOTTED WELL SCREENS ARE UNACCEPTABLE

Illinois Environmental Protection Agency Well Completion Report

SITE #: _____ COUNTY: Putnam WELL #: 05R
 SITE NAME: Hennepin Power Station - Dynegy Midwest Generation BOREHOLE #: _____
 STATE PLANE
 COORDINATE: X 1690521 Y 2533196 (or) LATITUDE: _____ LONGITUDE: _____
 SURVEYED BY: Homer L. Chastain & Associates ILL REGISTRATION #: _____
 DRILLING CONTRACTOR: Cascade Drilling DRILLER: Randy Radke
 CONSULTING FIRM: Natural Resource Technology GEOLOGIST: E. Kazonovitz
 DRILLING METHOD: Sonic DRILLING FLUIDS (TYPE): Water
 LOGGED BY: E. Kazonovitz DATE STARTED: 01/14/15 DATE FINISHED: 01/14/15
 REPORT FORM COMPLETED BY: E. Kazonovitz DATE: 03/26/15

ANNULAR SPACE DETAILS

TYPE OF SURFACE SEAL: Concrete

TYPE OF ANNULAR SEALANT: Grout

INSTALLATION METHOD: Pumped

SETTING TIME: + 24 hours

TYPE OF BENTONITE SEAL-

GRANULAR, PELLET, SLURRY, CHIPS
 (CIRCLE ONE)

INSTALLATION METHOD: Poured

SETTING TIME: ~ 15 minutes

TYPE OF SAND PACK: Quartz

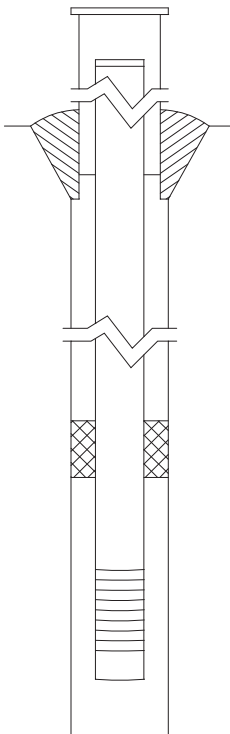
GRAIN SIZE: 40-60 U.S. Standard Series Sieve

INSTALLATION METHOD: Poured

TYPE OF BACKFILL MATERIAL: _____

(IF APPLICABLE)

INSTALLATION METHOD: _____



ELEVATIONS DEPTHS (.01 ft)

(MSL) *	(BGS)	
488.5	-2.9	TOP OF PROTECTIVE CASING
488.43	-2.8	TOP OF RISER PIPE
485.6	0	GROUND SURFACE
484.6	1.0	TOP OF ANNULAR SEALANT
448.4	41.86	STATIC WATER LEVEL (AFTER COMPLETION)
446.6	39.0	TOP OF SEAL
444.6	41.0	TOP OF SANDPACK
441.6	44.0	TOP OF SCREEN
431.6	54	BOTTOM OF SCREEN
431.6	54.0	BOTTOM OF WELL
430.6	55.0	BOTTOM OF BOREHOLE

* REFERENCED TO A NATIONAL GEODETIC VERTICAL DATUM

WELL CONSTRUCTION

MATERIALS

(CIRCLE ONE)

CASING MEASUREMENTS

PROTECTIVE CASING	SS304, SS316, PTFE, PVC OR OTHER: <u>Steel</u>
RISER PIPE ABOVE W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
RISER PIPE BELOW W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
SCREEN	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:

DIAMETER OF BOREHOLE (in.)	6
ID OF RISER PIPE (in)	2
PROTECTIVE CASING LENGTH (ft)	5
RISER PIPE LENGTH (ft)	46.8
BOTTOM OF SCREEN TO END CAP (ft)	0.5
SCREEN LENGTH (1st SLOT TO LAST SLOT) (ft)	10.0
TOTAL LENGTH OF CASING (ft)	NA
SCREEN SLOT SIZE **	0.1

** HAND-SLOTTED WELL SCREENS ARE UNACCEPTABLE

Illinois Environmental Protection Agency Well Completion Report

SITE #: _____ COUNTY: Putnam WELL #: 05DR
 SITE NAME: Hennepin Power Station - Dynegy Midwest Generation BOREHOLE #: _____
 STATE _____
 PLANE _____
 COORDINATE: X 1690520 Y 2533190 (or) LATITUDE: _____ LONGITUDE: _____
 SURVEYED BY: Homer L. Chastain & Associates ILL REGISTRATION #: _____
 DRILLING CONTRACTOR: Cascade Drilling DRILLER: Randy Radke
 CONSULTING FIRM: Natural Resource Technology GEOLOGIST: E. Kazonovitz
 DRILLING METHOD: Sonic DRILLING FLUIDS (TYPE): Water
 LOGGED BY: E. Kazonovitz DATE STARTED: 01/14/15 DATE FINISHED: 01/14/15
 REPORT FORM COMPLETED BY: E. Kazonovitz DATE: 03/26/15

ANNULAR SPACE DETAILS

TYPE OF SURFACE SEAL: Concrete

TYPE OF ANNULAR SEALANT: Grout

INSTALLATION METHOD: Pumped

SETTING TIME: + 24 hours

TYPE OF BENTONITE SEAL-

GRANULAR, PELLET, SLURRY, CHIPS
 (CIRCLE ONE)

INSTALLATION METHOD: Poured

SETTING TIME: ~ 15 minutes

TYPE OF SAND PACK: Quartz

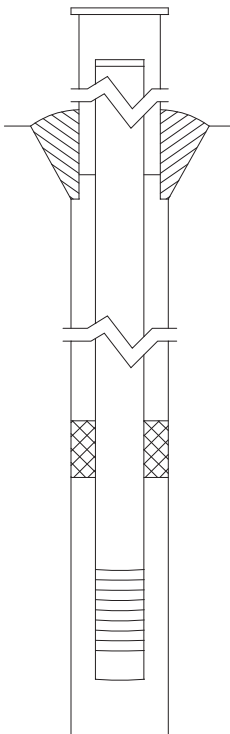
GRAIN SIZE: 40-60 U.S. Standard Series Sieve

INSTALLATION METHOD: Poured

TYPE OF BACKFILL MATERIAL: _____

(IF APPLICABLE)

INSTALLATION METHOD: _____



ELEVATIONS DEPTHS (.01 ft)

(MSL) *	(BGS)	
488.5	-2.8	TOP OF PROTECTIVE CASING
488.4	-2.7	TOP OF RISER PIPE
485.7	0	GROUND SURFACE
484.7	1.0	TOP OF ANNULAR SEALANT
448.4	41.86	STATIC WATER LEVEL (AFTER COMPLETION)
420.7	65.0	TOP OF SEAL
418.7	67.0	TOP OF SANDPACK
415.7	70.0	TOP OF SCREEN
410.7	75	BOTTOM OF SCREEN
410.7	75.0	BOTTOM OF WELL
409.7	76.0	BOTTOM OF BOREHOLE

* REFERENCED TO A NATIONAL GEODETIC VERTICAL DATUM

WELL CONSTRUCTION

MATERIALS

(CIRCLE ONE)

CASING MEASUREMENTS

PROTECTIVE CASING	SS304, SS316, PTFE, PVC OR OTHER: <u>Steel</u>
RISER PIPE ABOVE W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
RISER PIPE BELOW W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
SCREEN	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:

DIAMETER OF BOREHOLE (in.)	6
ID OF RISER PIPE (in)	2
PROTECTIVE CASING LENGTH (ft)	5
RISER PIPE LENGTH (ft)	72.7
BOTTOM OF SCREEN TO END CAP (ft)	0.5
SCREEN LENGTH (1st SLOT TO LAST SLOT) (ft)	5.0
TOTAL LENGTH OF CASING (ft)	NA
SCREEN SLOT SIZE **	0.1

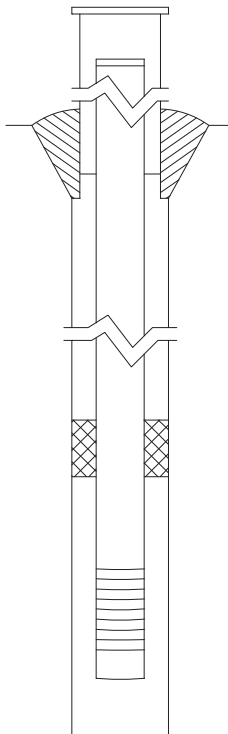
** HAND-SLOTTED WELL SCREENS ARE UNACCEPTABLE

Illinois Environmental Protection Agency Well Completion Report

SITE #: _____ COUNTY: Putnam WELL #: 08D
 SITE NAME: Hennepin Power Station - Dynegy Midwest Generation BOREHOLE #: _____
 STATE PLANE
 COORDINATE: X 1688932 Y 2533463 (or) LATITUDE: _____ LONGITUDE: _____
 SURVEYED BY: Homer L. Chastain & Associates ILL REGISTRATION #: _____
 DRILLING CONTRACTOR: Boart Longyear Company DRILLER: Mike Hansen
 CONSULTING FIRM: Natural Resource Technology/Kelron Env. GEOLOGIST: R. Wilberding
 DRILLING METHOD: Sonic DRILLING FLUIDS (TYPE): water
 LOGGED BY: R. Wilberding DATE STARTED: 04/16/09 DATE FINISHED: 04/17/09
 REPORT FORM COMPLETED BY: R. Wilberding DATE: 05/26/09

ANNULAR SPACE DETAILS

TYPE OF SURFACE SEAL: Concrete
 TYPE OF ANNULAR SEALANT: Bentonite grout
 INSTALLATION METHOD: pumped
 SETTING TIME: + 24 hours
 TYPE OF BENTONITE SEAL-
 GRANULAR, PELLET, SLURRY, CHIPS
(CIRCLE ONE)
 INSTALLATION METHOD: pured and hydrated
 SETTING TIME: ~ 15 minutes
 TYPE OF SAND PACK: Quartz
 GRAIN SIZE: 40-60 U.S. Standard Series Sieve
 INSTALLATION METHOD: Poured
 TYPE OF BACKFILL MATERIAL: Bentonite chips
(IF APPLICABLE)
 INSTALLATION METHOD: Poured



ELEVATIONS		DEPTHS	(.01 ft)
(MSL) *	(BGS)		
<u>501.78</u>	<u>-2.6</u>		TOP OF PROTECTIVE CASING
<u>501.45</u>	<u>-2.3</u>		TOP OF RISER PIPE
<u>499.2</u>	<u>0</u>		GROUND SURFACE
<u>498.2</u>	<u>1.0</u>		TOP OF ANNULAR SEALANT
<u>448.4</u>	<u>50.8</u>		STATIC WATER LEVEL (AFTER COMPLETION)
<u>424.2</u>	<u>75.0</u>		TOP OF SEAL
<u>419.2</u>	<u>80.0</u>		TOP OF SANDPACK
<u>416.2</u>	<u>83.0</u>		TOP OF SCREEN
<u>411.2</u>	<u>88</u>		BOTTOM OF SCREEN
<u>409.2</u>	<u>90.0</u>		BOTTOM OF WELL
<u>379.2</u>	<u>120.0</u>		BOTTOM OF BOREHOLE

* REFERENCED TO A NATIONAL GEODETIC VERTICAL DATUM

WELL CONSTRUCTION

MATERIALS

(CIRCLE ONE)

PROTECTIVE CASING	SS304, SS316, PTFE, PVC OR OTHER: <u>Steel</u>
RISER PIPE ABOVE W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
RISER PIPE BELOW W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
SCREEN	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:

CASING MEASUREMENTS

DIAMETER OF BOREHOLE (in.)	6
ID OF RISER PIPE (in)	2
PROTECTIVE CASING LENGTH (ft)	5
RISER PIPE LENGTH (ft)	85.3
BOTTOM OF SCREEN TO END CAP (ft)	2
SCREEN LENGTH (1st SLOT TO LAST SLOT) (ft)	5.0
TOTAL LENGTH OF CASING (ft)	92.3
SCREEN SLOT SIZE **	0.1

** HAND-SLOTTED WELL SCREENS ARE UNACCEPTABLE

Illinois Environmental Protection Agency Well Completion Report

SITE #: _____ COUNTY: Putnam WELL #: 18D

SITE NAME: Hennepin Power Station - Dynegy Midwest Generation BOREHOLE #: _____

STATE PLANE

COORDINATE: X 1688932 Y 2533463 (or) LATITUDE: _____ LONGITUDE: _____

SURVEYED BY: Homer L. Chastain & Associates ILL REGISTRATION #: _____

DRILLING CONTRACTOR: Boart Longyear Company DRILLER: Mike Hansen

CONSULTING FIRM: Natural Resource Technology/Kelron Env. GEOLOGIST: R. Wilberding

DRILLING METHOD: Sonic DRILLING FLUIDS (TYPE): water

LOGGED BY: R. Wilberding DATE STARTED: 04/14/09 DATE FINISHED: 04/14/09

REPORT FORM COMPLETED BY: R. Wilberding DATE: 05/26/09

ANNULAR SPACE DETAILS

TYPE OF SURFACE SEAL: Concrete

TYPE OF ANNULAR SEALANT: Bentonite grout

INSTALLATION METHOD: pumped

SETTING TIME: + 24 hours

TYPE OF BENTONITE SEAL-
 GRANULAR, PELLET, SLURRY, CHIPS
(CIRCLE ONE)

INSTALLATION METHOD: poured and hydrated

SETTING TIME: ~ 15 minutes

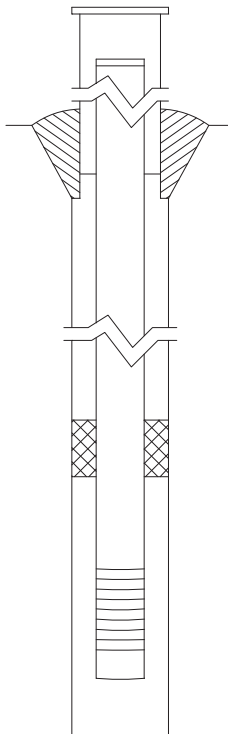
TYPE OF SAND PACK: Quartz

GRAIN SIZE: 40-60 U.S. Standard Series Sieve

INSTALLATION METHOD: Poured

TYPE OF BACKFILL MATERIAL: Bentonite chips
(IF APPLICABLE)

INSTALLATION METHOD: Poured



ELEVATIONS DEPTHS (.01 ft)

(MSL) *	(BGS)	
485.18	0	TOP OF PROTECTIVE CASING
484.43	0.8	TOP OF RISER PIPE
485.22	0	GROUND SURFACE
483.2	2.0	TOP OF ANNULAR SEALANT
451.2	34	STATIC WATER LEVEL (AFTER COMPLETION)
422.2	63.0	TOP OF SEAL
417.2	68.0	TOP OF SANDPACK
414.2	71.0	TOP OF SCREEN
409.2	76	BOTTOM OF SCREEN
407.2	78.0	BOTTOM OF WELL
390.2	95.0	BOTTOM OF BOREHOLE

* REFERENCED TO A NATIONAL GEODETIC VERTICAL DATUM

WELL CONSTRUCTION

MATERIALS

(CIRCLE ONE)

PROTECTIVE CASING	SS304, SS316, PTFE, PVC OR OTHER: <u>Steel</u>
RISER PIPE ABOVE W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
RISER PIPE BELOW W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
SCREEN	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:

CASING MEASUREMENTS

DIAMETER OF BOREHOLE (in.)	6
ID OF RISER PIPE (in)	2
PROTECTIVE CASING LENGTH (ft)	5
RISER PIPE LENGTH (ft)	70.2
BOTTOM OF SCREEN TO END CAP (ft)	2
SCREEN LENGTH (1st SLOT TO LAST SLOT) (ft)	5.0
TOTAL LENGTH OF CASING (ft)	77.2
SCREEN SLOT SIZE **	0.1

** HAND-SLOTTED WELL SCREENS ARE UNACCEPTABLE

Illinois Environmental Protection Agency Well Completion Report

SITE #: _____ COUNTY: Putnam WELL #: 18S

SITE NAME: Hennepin Power Station - Dynegy Midwest Generation BOREHOLE #: _____

STATE PLANE

COORDINATE: X 1688932 Y 2533463 (or) LATITUDE: _____ LONGITUDE: _____

SURVEYED BY: Homer L. Chastain & Associates ILL REGISTRATION #: _____

DRILLING CONTRACTOR: Boart Longyear Company DRILLER: Mike Hansen

CONSULTING FIRM: Natural Resource Technology/Kelron Env. GEOLOGIST: R. Wilberding

DRILLING METHOD: Sonic DRILLING FLUIDS (TYPE): water

LOGGED BY: R. Wilberding DATE STARTED: 04/14/09 DATE FINISHED: 04/14/09

REPORT FORM COMPLETED BY: R. Wilberding DATE: 05/26/09

ANNULAR SPACE DETAILS

TYPE OF SURFACE SEAL: Concrete

TYPE OF ANNULAR SEALANT: Bentonite grout

INSTALLATION METHOD: pumped

SETTING TIME: + 24 hours

TYPE OF BENTONITE SEAL-

GRANULAR, PELLET, SLURRY, CHIPS
(CIRCLE ONE)

INSTALLATION METHOD: poured and hydrated

SETTING TIME: ~ 15 minutes

TYPE OF SAND PACK: Quartz

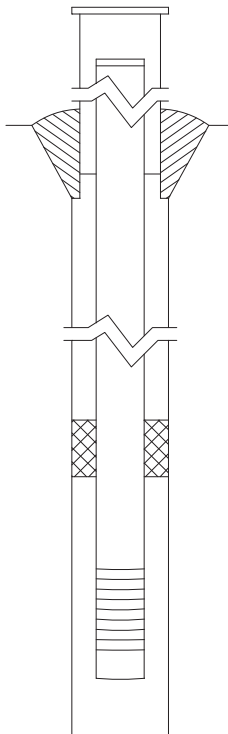
GRAIN SIZE: 40-60 U.S. Standard Series Sieve

INSTALLATION METHOD: Poured

TYPE OF BACKFILL MATERIAL: Bentonite chips

(IF APPLICABLE)

INSTALLATION METHOD: Poured



ELEVATIONS DEPTHS (.01 ft)

(MSL) *	(BGS)	
485.23	0	TOP OF PROTECTIVE CASING
484.64	0.6	TOP OF RISER PIPE
485.22	0	GROUND SURFACE
484.2	1.0	TOP OF ANNULAR SEALANT
451.2	34	STATIC WATER LEVEL (AFTER COMPLETION)
453.2	32.0	TOP OF SEAL
448.2	37.0	TOP OF SANDPACK
445.2	40.0	TOP OF SCREEN
435.2	50	BOTTOM OF SCREEN
433.2	52.0	BOTTOM OF WELL
433.2	52.0	BOTTOM OF BOREHOLE

* REFERENCED TO A NATIONAL GEODETIC VERTICAL DATUM

WELL CONSTRUCTION

MATERIALS

(CIRCLE ONE)

PROTECTIVE CASING	SS304, SS316, PTFE, PVC OR OTHER: <u>Steel</u>
RISER PIPE ABOVE W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
RISER PIPE BELOW W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
SCREEN	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:

CASING MEASUREMENTS

DIAMETER OF BOREHOLE (in.)	6
ID OF RISER PIPE (in)	2
PROTECTIVE CASING LENGTH (ft)	5
RISER PIPE LENGTH (ft)	38.4
BOTTOM OF SCREEN TO END CAP (ft)	2
SCREEN LENGTH (1st SLOT TO LAST SLOT) (ft)	10.0
TOTAL LENGTH OF CASING (ft)	51.4
SCREEN SLOT SIZE **	0.1

** HAND-SLOTTED WELL SCREENS ARE UNACCEPTABLE

Illinois Environmental Protection Agency Well Completion Report

SITE #: _____ COUNTY: Putnam WELL #: 19D

SITE NAME: Hennepin Power Station - Dynegy Midwest Generation BOREHOLE #: _____

STATE PLANE

COORDINATE: X 1688932 Y 2533463 (or) LATITUDE: _____ LONGITUDE: _____

SURVEYED BY: Homer L. Chastain & Associates ILL REGISTRATION #: _____

DRILLING CONTRACTOR: Boart Longyear Company DRILLER: Mike Hansen

CONSULTING FIRM: Natural Resource Technology/Kelron Env. GEOLOGIST: R. Wilberding

DRILLING METHOD: Sonic DRILLING FLUIDS (TYPE): water

LOGGED BY: R. Wilberding DATE STARTED: 04/15/09 DATE FINISHED: 04/15/09

REPORT FORM COMPLETED BY: R. Wilberding DATE: 05/26/09

ANNULAR SPACE DETAILS

TYPE OF SURFACE SEAL: Concrete

TYPE OF ANNULAR SEALANT: Bentonite grout

INSTALLATION METHOD: pumped

SETTING TIME: + 24 hours

TYPE OF BENTONITE SEAL-
 GRANULAR, PELLET, SLURRY, CHIPS
(CIRCLE ONE)

INSTALLATION METHOD: poured and hydrated

SETTING TIME: ~ 15 minutes

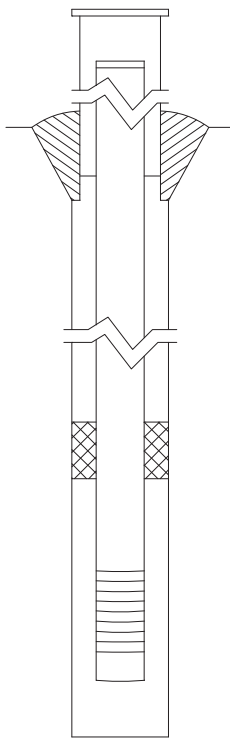
TYPE OF SAND PACK: Quartz

GRAIN SIZE: 40-60 U.S. Standard Series Sieve

INSTALLATION METHOD: Poured

TYPE OF BACKFILL MATERIAL: Bentonite chips
(IF APPLICABLE)

INSTALLATION METHOD: Poured



ELEVATIONS DEPTHS (.01 ft)

(MSL) *	(BGS)	
483.8	0.1	TOP OF PROTECTIVE CASING
483.3	0.6	TOP OF RISER PIPE
483.9	0	GROUND SURFACE
482.9	1.0	TOP OF ANNULAR SEALANT
450.9	33	STATIC WATER LEVEL (AFTER COMPLETION)
424.9	59.0	TOP OF SEAL
419.9	64.0	TOP OF SANDPACK
416.9	67.0	TOP OF SCREEN
410.9	73	BOTTOM OF SCREEN
408.9	75.0	BOTTOM OF WELL
398.9	85.0	BOTTOM OF BOREHOLE

* REFERENCED TO A NATIONAL GEODETIC VERTICAL DATUM

WELL CONSTRUCTION

MATERIALS

(CIRCLE ONE)

PROTECTIVE CASING	SS304, SS316, PTFE, PVC OR OTHER: <u>Steel</u>
RISER PIPE ABOVE W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
RISER PIPE BELOW W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
SCREEN	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:

CASING MEASUREMENTS

DIAMETER OF BOREHOLE (in.)	6
ID OF RISER PIPE (in)	2
PROTECTIVE CASING LENGTH (ft)	5
RISER PIPE LENGTH (ft)	67.6
BOTTOM OF SCREEN TO END CAP (ft)	2
SCREEN LENGTH (1st SLOT TO LAST SLOT) (ft)	5.0
TOTAL LENGTH OF CASING (ft)	75.6
SCREEN SLOT SIZE **	0.1

** HAND-SLOTTED WELL SCREENS ARE UNACCEPTABLE

Illinois Environmental Protection Agency Well Completion Report

SITE #: _____ COUNTY: Putnam WELL #: 19S

SITE NAME: Hennepin Power Station - Dynegy Midwest Generation BOREHOLE #: _____

STATE PLANE

COORDINATE: X 1688932 Y 2533463 (or) LATITUDE: _____ LONGITUDE: _____

SURVEYED BY: Homer L. Chastain & Associates ILL REGISTRATION #: _____

DRILLING CONTRACTOR: Boart Longyear Company DRILLER: Mike Hansen

CONSULTING FIRM: Natural Resource Technology/Kelron Env. GEOLOGIST: R. Wilberding

DRILLING METHOD: Sonic DRILLING FLUIDS (TYPE): water

LOGGED BY: R. Wilberding DATE STARTED: 04/16/09 DATE FINISHED: 04/16/09

REPORT FORM COMPLETED BY: R. Wilberding DATE: 05/26/09

ANNULAR SPACE DETAILS

TYPE OF SURFACE SEAL: Concrete

TYPE OF ANNULAR SEALANT: Bentonite grout

INSTALLATION METHOD: pumped

SETTING TIME: + 24 hours

TYPE OF BENTONITE SEAL-
GRANULAR, PELLET, SLURRY, CHIPS
(CIRCLE ONE)

INSTALLATION METHOD: poured and hydrated

SETTING TIME: ~ 15 minutes

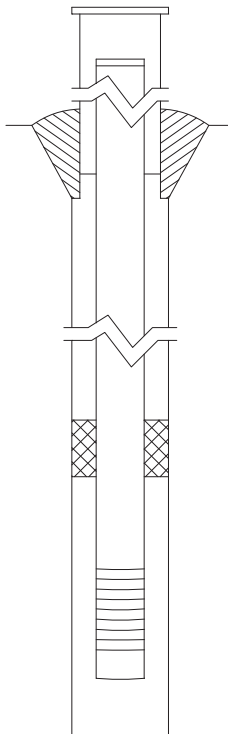
TYPE OF SAND PACK: Quartz

GRAIN SIZE: 40-60 U.S. Standard Series Sieve

INSTALLATION METHOD: Poured

TYPE OF BACKFILL MATERIAL: Bentonite chips
(IF APPLICABLE)

INSTALLATION METHOD: Poured



ELEVATIONS DEPTHS (.01 ft)

(MSL) *	(BGS)	
483.88	0	TOP OF PROTECTIVE CASING
483.34	0.6	TOP OF RISER PIPE
483.86	0	GROUND SURFACE
482.9	1.0	TOP OF ANNULAR SEALANT
450.9	33	STATIC WATER LEVEL (AFTER COMPLETION)
451.9	32.0	TOP OF SEAL
446.9	37.0	TOP OF SANDPACK
443.9	40.0	TOP OF SCREEN
433.9	50	BOTTOM OF SCREEN
431.9	52.0	BOTTOM OF WELL
431.9	52.0	BOTTOM OF BOREHOLE

* REFERENCED TO A NATIONAL GEODETIC VERTICAL DATUM

WELL CONSTRUCTION

MATERIALS

(CIRCLE ONE)

PROTECTIVE CASING	SS304, SS316, PTFE, PVC OR OTHER: <u>Steel</u>
RISER PIPE ABOVE W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
RISER PIPE BELOW W.T.	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:
SCREEN	SS304, SS316, PTFE, <u>PVC</u> OR OTHER:

CASING MEASUREMENTS

DIAMETER OF BOREHOLE (in.)	6
ID OF RISER PIPE (in)	2
PROTECTIVE CASING LENGTH (ft)	5
RISER PIPE LENGTH (ft)	39.4
BOTTOM OF SCREEN TO END CAP (ft)	2
SCREEN LENGTH (1st SLOT TO LAST SLOT) (ft)	10.0
TOTAL LENGTH OF CASING (ft)	51.4
SCREEN SLOT SIZE **	0.1

** HAND-SLOTTED WELL SCREENS ARE UNACCEPTABLE

Illinois Environmental Protection Agency Well Completion Report

SITE #: _____ COUNTY: Putnam WELL #: 40S
 SITE NAME: Hennepin Power Station - Dynegy Midwest Generation BOREHOLE #: _____
 STATE _____
 PLANE _____
 COORDINATE: X 1690566.812 Y 2533491.9 (or) LATITUDE: _____ LONGITUDE: _____
 SURVEYED BY: Illinois Valley Surveying and Consultants, Inc ILL REGISTRATION #: _____
 DRILLING CONTRACTOR: PSC Environmental DRILLER: Jerry Hancock
 CONSULTING FIRM: Natural Resource Technology/Kelron Env. GEOLOGIST: B. Hennings
 DRILLING METHOD: Hollow Stem Auger DRILLING FLUIDS (TYPE): water
 LOGGED BY: B. Hennings DATE STARTED: 10/25/10 DATE FINISHED: 10/26/10
 REPORT FORM COMPLETED BY: B. Hennings DATE: 12/06/10

ANNULAR SPACE DETAILS

ELEVATIONS DEPTHS (.01 ft)

TYPE OF SURFACE SEAL: Concrete

TYPE OF ANNULAR SEALANT: Bentonite

INSTALLATION METHOD: Poured

SETTING TIME: + 24 hours

TYPE OF BENTONITE SEAL-

GRANULAR, PELLET, SLURRY, CHIPS
(CIRCLE ONE)

INSTALLATION METHOD: pumped

SETTING TIME: - 15 minutes

TYPE OF SAND PACK: Quartz

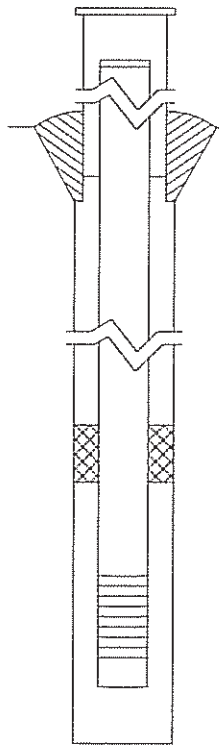
GRAIN SIZE: 40-60 U.S. Standard Series Sieve

INSTALLATION METHOD: Poured

TYPE OF BACKFILL MATERIAL: Quartz sand

(IF APPLICABLE)

INSTALLATION METHOD: Poured



(MSL) *	(BGS)	
<u>484.8</u>	<u>0</u>	TOP OF PROTECTIVE CASING
<u>484.42</u>	<u>0.3</u>	TOP OF RISER PIPE
<u>484.75</u>	<u>0</u>	GROUND SURFACE
<u>483.8</u>	<u>1.0</u>	TOP OF ANNULAR SEALANT
<u>472.8</u>	<u>12</u>	STATIC WATER LEVEL (AFTER COMPLETION)
<u>450.8</u>	<u>34.0</u>	TOP OF SEAL
<u>447.8</u>	<u>37.0</u>	TOP OF SANDPACK
<u>444.8</u>	<u>40.0</u>	TOP OF SCREEN
<u>434.8</u>	<u>50</u>	BOTTOM OF SCREEN
<u>434.5</u>	<u>50.3</u>	BOTTOM OF WELL
<u>434.3</u>	<u>50.5</u>	BOTTOM OF BOREHOLE

* REFERENCED TO A NATIONAL GEODETIC VERTICAL DATUM

WELL CONSTRUCTION

MATERIALS

(CIRCLE ONE)

PROTECTIVE CASING	SS304, SS316, PTFE, PVC OR OTHER: <u>Steel</u>
RISER PIPE ABOVE W.T.	SS304, SS316, PTFE, PVC OR OTHER: <u>PVC</u>
RISER PIPE BELOW W.T.	SS304, SS316, PTFE, PVC OR OTHER: <u>PVC</u>
SCREEN	SS304, SS316, PTFE, PVC OR OTHER: <u>PVC</u>

CASING MEASUREMENTS

DIAMETER OF BOREHOLE (In.)	8
ID OF RISER PIPE (In)	2
PROTECTIVE CASING LENGTH (ft)	1
RISER PIPE LENGTH (ft)	39.7
BOTTOM OF SCREEN TO END CAP (ft)	0.3
SCREEN LENGTH (1st SLOT TO LAST SLOT) (ft)	10.0
TOTAL LENGTH OF CASING (ft)	50.0
SCREEN SLOT SIZE **	0.1

** HAND-SLOTTED WELL SCREENS ARE UNACCEPTABLE

Facility/Project Name Hennepin Power Station		Local Grid Location of Well _____ ft. <input type="checkbox"/> N. _____ ft. <input type="checkbox"/> E. <input type="checkbox"/> S. _____ ft. <input type="checkbox"/> W.		Well Name 45S	
Facility License, Permit or Monitoring No.		Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/>) or Well Location <input checked="" type="checkbox"/>		Date Well Installed 06/29/2015	
Facility ID		Lat. <u>41° 18' 13.503"</u> Long. <u>-89° 18' 36.702"</u> or		Well Installed By: (Person's Name and Firm) Chad Dutton	
Type of Well mw		St. Plane <u>1,689,993.67</u> ft. N, <u>2,531,896.69</u> ft. E. E/W		Bulldog Drilling	
Distance from Waste/Source ft.		Section Location of Waste/Source _____ 1/4 of _____ 1/4 of Sec. _____, T. _____ N, R. _____ <input type="checkbox"/> E <input type="checkbox"/> W			
State Illinois		Location of Well Relative to Waste/Source u <input type="checkbox"/> Upgradient s <input type="checkbox"/> Sidegradient d <input checked="" type="checkbox"/> Downgradient n <input type="checkbox"/> Not Known		Gov. Lot Number	

<p>A. Protective pipe, top elevation _____ ft. (NAVD88)</p> <p>B. Well casing, top elevation <u>467.48</u> ft. (NAVD88)</p> <p>C. Land surface elevation <u>465.70</u> ft. (NAVD88)</p> <p>D. Surface seal, bottom <u>464.7</u> ft. (NAVD88) or <u>1.0</u> ft.</p>		<p>1. Cap and lock? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>2. Protective cover pipe: a. Inside diameter: _____ 4.0 in. b. Length: _____ 5.0 ft. c. Material: Steel <input checked="" type="checkbox"/> Other <input type="checkbox"/> d. Additional protection? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: _____ Three steel bollards</p> <p>3. Surface seal: Bentonite <input type="checkbox"/> Concrete <input checked="" type="checkbox"/> Other <input type="checkbox"/></p> <p>4. Material between well casing and protective pipe: Bentonite <input checked="" type="checkbox"/> Sand _____ Other <input checked="" type="checkbox"/></p> <p>5. Annular space seal: a. Granular/Chipped Bentonite <input type="checkbox"/> b. _____ Lbs/gal mud weight . . . Bentonite-sand slurry <input type="checkbox"/> c. _____ Lbs/gal mud weight . . . Bentonite slurry <input type="checkbox"/> d. <u>30</u> % Bentonite . . . Bentonite-cement grout <input checked="" type="checkbox"/> e. _____ Ft³ volume added for any of the above f. How installed: Tremie <input type="checkbox"/> Tremie pumped <input checked="" type="checkbox"/> Gravity <input type="checkbox"/></p> <p>6. Bentonite seal: a. Bentonite granules <input type="checkbox"/> b. <input type="checkbox"/> 1/4 in. <input checked="" type="checkbox"/> 3/8 in. <input type="checkbox"/> 1/2 in. Bentonite chips <input checked="" type="checkbox"/> c. _____ Other <input type="checkbox"/></p> <p>7. Fine sand material: Manufacturer, product name & mesh size a. _____ b. Volume added _____ ft³</p> <p>8. Filter pack material: Manufacturer, product name & mesh size a. <u>33-35 ft formation sand backfill above prepacked screen.</u> b. Volume added _____ ft³</p> <p>9. Well casing: Flush threaded PVC schedule 40 <input checked="" type="checkbox"/> Flush threaded PVC schedule 80 <input type="checkbox"/> _____ Other <input type="checkbox"/></p> <p>10. Screen material: _____ Schedule 40 PVC a. Screen Type: Factory cut <input type="checkbox"/> Continuous slot <input type="checkbox"/> Sand prepacked screen _____ Other <input checked="" type="checkbox"/> b. Manufacturer _____ c. Slot size: _____ 0.010 in. d. Slotted length: _____ 10.0 ft.</p> <p>11. Backfill material (below filter pack): None <input checked="" type="checkbox"/> Other <input type="checkbox"/></p>
<p>12. USCS classification of soil near screen: GP <input type="checkbox"/> GM <input type="checkbox"/> GC <input type="checkbox"/> GW <input checked="" type="checkbox"/> SW <input checked="" type="checkbox"/> SP <input type="checkbox"/> SM <input type="checkbox"/> SC <input type="checkbox"/> ML <input checked="" type="checkbox"/> MH <input type="checkbox"/> CL <input type="checkbox"/> CH <input type="checkbox"/> Bedrock <input type="checkbox"/></p> <p>13. Sieve analysis attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>14. Drilling method used: Rotary <input type="checkbox"/> Hollow Stem Auger <input checked="" type="checkbox"/> _____ Other <input type="checkbox"/></p> <p>15. Drilling fluid used: Water <input checked="" type="checkbox"/> 0.2 Air <input type="checkbox"/> Drilling Mud <input type="checkbox"/> 0.3 None <input type="checkbox"/></p> <p>16. Drilling additives used? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Describe _____</p> <p>17. Source of water (attach analysis, if required): _____ Onsite Potable Well</p>		
<p>E. Bentonite seal, top <u>434.7</u> ft. (NAVD88) or <u>31.0</u> ft.</p> <p>F. Fine sand, top _____ ft. (NAVD88) or _____ ft.</p> <p>G. Filter pack, top <u>432.7</u> ft. (NAVD88) or <u>33.0</u> ft.</p> <p>H. Screen joint, top <u>430.7</u> ft. (NAVD88) or <u>35.0</u> ft.</p> <p>I. Well bottom <u>420.7</u> ft. (NAVD88) or <u>45.0</u> ft.</p> <p>J. Filter pack, bottom <u>420.7</u> ft. (NAVD88) or <u>45.0</u> ft.</p> <p>K. Borehole, bottom <u>420.7</u> ft. (NAVD88) or <u>45.0</u> ft.</p> <p>L. Borehole, diameter <u>8.3</u> in.</p> <p>M. O.D. well casing <u>2.38</u> in.</p> <p>N. I.D. well casing <u>2.07</u> in.</p>		

I hereby certify that the information on this form is true and correct to the best of my knowledge. Date Modified: 11/4/2015

Signature Peter M Hoff Firm Natural Resource Technology Tel: (414) 837-3607
234 W. Florida Street, Floor 5, Milwaukee, WI 53204 Fax: (414) 837-3608

Facility/Project Name Hennepin Power Station		Local Grid Location of Well _____ ft. <input type="checkbox"/> N. _____ ft. <input type="checkbox"/> E. <input type="checkbox"/> S. _____ ft. <input type="checkbox"/> W.		Well Name 46	
Facility License, Permit or Monitoring No.		Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/>) or Well Location <input checked="" type="checkbox"/>		Date Well Installed 08/11/2015	
Facility ID		Lat. <u>41° 18' 14.230"</u> Long. <u>-89° 18' 12.500"</u> or		Well Installed By: (Person's Name and Firm) Jason Drabek	
Type of Well mw		St. Plane <u>1,690,085.24</u> ft. N, <u>2,533,743.42</u> ft. E. E/W		Well Installed By: (Person's Name and Firm) Jason Drabek	
Distance from Waste/Source ft.		Section Location of Waste/Source _____ 1/4 of _____ 1/4 of Sec. _____, T. _____ N, R. _____ <input type="checkbox"/> E <input type="checkbox"/> W		Well Installed By: (Person's Name and Firm) Jason Drabek	
State Illinois		Location of Well Relative to Waste/Source u <input type="checkbox"/> Upgradient s <input type="checkbox"/> Sidegradient d <input checked="" type="checkbox"/> Downgradient n <input type="checkbox"/> Not Known		Gov. Lot Number _____	
				Well Installed By: (Person's Name and Firm) Cascade Drilling	

<p>A. Protective pipe, top elevation _____ ft. (NAVD88)</p> <p>B. Well casing, top elevation <u>498.75</u> ft. (NAVD88)</p> <p>C. Land surface elevation <u>496.44</u> ft. (NAVD88)</p> <p>D. Surface seal, bottom <u>495.4</u> ft. (NAVD88) or <u>1.0</u> ft.</p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>12. USCS classification of soil near screen: GP <input type="checkbox"/> GM <input type="checkbox"/> GC <input type="checkbox"/> GW <input checked="" type="checkbox"/> SW <input type="checkbox"/> SP <input type="checkbox"/> SM <input type="checkbox"/> SC <input type="checkbox"/> ML <input type="checkbox"/> MH <input type="checkbox"/> CL <input type="checkbox"/> CH <input type="checkbox"/> Bedrock <input type="checkbox"/></p> <p>13. Sieve analysis attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>14. Drilling method used: Rotary <input type="checkbox"/> Hollow Stem Auger <input type="checkbox"/> _____ Sonic _____ Other <input checked="" type="checkbox"/></p> <p>15. Drilling fluid used: Water <input checked="" type="checkbox"/> 0.2 Air <input type="checkbox"/> Drilling Mud <input type="checkbox"/> 0.3 None <input type="checkbox"/></p> <p>16. Drilling additives used? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Describe _____</p> <p>17. Source of water (attach analysis, if required): _____ Onsite Potable Well</p> </div> <p>E. Bentonite seal, top <u>495.4</u> ft. (NAVD88) or <u>1.0</u> ft.</p> <p>F. Fine sand, top _____ ft. (NAVD88) or _____ ft.</p> <p>G. Filter pack, top <u>449.4</u> ft. (NAVD88) or <u>47.0</u> ft.</p> <p>H. Screen joint, top <u>446.4</u> ft. (NAVD88) or <u>50.0</u> ft.</p> <p>I. Well bottom <u>436.4</u> ft. (NAVD88) or <u>60.0</u> ft.</p> <p>J. Filter pack, bottom <u>436.4</u> ft. (NAVD88) or <u>60.0</u> ft.</p> <p>K. Borehole, bottom <u>436.4</u> ft. (NAVD88) or <u>60.0</u> ft.</p> <p>L. Borehole, diameter <u>6.0</u> in.</p> <p>M. O.D. well casing <u>2.38</u> in.</p> <p>N. I.D. well casing <u>2.07</u> in.</p>		<p>1. Cap and lock? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>2. Protective cover pipe: a. Inside diameter: <u>4.0</u> in. b. Length: <u>5.0</u> ft. c. Material: Steel <input checked="" type="checkbox"/> _____ Other <input type="checkbox"/> d. Additional protection? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: <u>Three steel bollards</u></p> <p>3. Surface seal: Bentonite <input type="checkbox"/> Concrete <input checked="" type="checkbox"/> _____ Other <input type="checkbox"/></p> <p>4. Material between well casing and protective pipe: Bentonite <input checked="" type="checkbox"/> Sand _____ Other <input checked="" type="checkbox"/></p> <p>5. Annular space seal: a. Granular/Chipped Bentonite <input checked="" type="checkbox"/> b. _____ Lbs/gal mud weight . . . Bentonite-sand slurry <input type="checkbox"/> c. _____ Lbs/gal mud weight . . . Bentonite slurry <input type="checkbox"/> d. <u>30</u> % Bentonite . . . Bentonite-cement grout <input checked="" type="checkbox"/> e. _____ Ft³ volume added for any of the above f. How installed: Tremie <input type="checkbox"/> Tremie pumped <input checked="" type="checkbox"/> Gravity <input type="checkbox"/></p> <p>6. Bentonite seal: a. Bentonite granules <input type="checkbox"/> b. <input type="checkbox"/> 1/4 in. <input checked="" type="checkbox"/> 3/8 in. <input type="checkbox"/> 1/2 in. Bentonite chips <input checked="" type="checkbox"/> c. _____ Other <input type="checkbox"/></p> <p>7. Fine sand material: Manufacturer, product name & mesh size a. _____ b. Volume added _____ ft³</p> <p>8. Filter pack material: Manufacturer, product name & mesh size a. <u>Red Flint Sand and Gravel, Well Pack</u> b. Volume added _____ ft³</p> <p>9. Well casing: Flush threaded PVC schedule 40 <input checked="" type="checkbox"/> Flush threaded PVC schedule 80 <input type="checkbox"/> _____ Other <input type="checkbox"/></p> <p>10. Screen material: <u>Schedule 40 PVC</u> a. Screen Type: Factory cut <input checked="" type="checkbox"/> Continuous slot <input type="checkbox"/> _____ Other <input type="checkbox"/> b. Manufacturer _____ c. Slot size: <u>0.010</u> in. d. Slotted length: <u>10.0</u> ft.</p> <p>11. Backfill material (below filter pack): None <input checked="" type="checkbox"/> _____ Other <input type="checkbox"/></p>
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I hereby certify that the information on this form is true and correct to the best of my knowledge. Date Modified: 11/4/2015

Signature <i>Andrea Salvo</i>	Firm Natural Resource Technology 234 W. Florida Street, Floor 5, Milwaukee, WI 53204	Tel: (414) 837-3607 Fax: (414) 837-3608
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Facility/Project Name Hennepin Power Station		Local Grid Location of Well _____ ft. <input type="checkbox"/> N. _____ ft. <input type="checkbox"/> E. <input type="checkbox"/> S. _____ ft. <input type="checkbox"/> W.		Well Name	
Facility License, Permit or Monitoring No.		Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/>) or Well Location <input checked="" type="checkbox"/>		47	
Facility ID		Lat. <u>41° 18' 11.850"</u> Long. <u>-89° 18' 21.579"</u> or			
Type of Well mw		St. Plane <u>1,689,837.69</u> ft. N, <u>2,533,052.86</u> ft. E. E/W		Date Well Installed 08/11/2015	
Distance from Waste/Source ft.		Section Location of Waste/Source _____ 1/4 of _____ 1/4 of Sec. _____, T. _____ N, R. _____ <input type="checkbox"/> E <input type="checkbox"/> W		Well Installed By: (Person's Name and Firm) Jason Drabek	
State Illinois		Location of Well Relative to Waste/Source u <input type="checkbox"/> Upgradient s <input type="checkbox"/> Sidegradient d <input checked="" type="checkbox"/> Downgradient n <input type="checkbox"/> Not Known		Gov. Lot Number _____	
				Cascade Drilling	

<p>A. Protective pipe, top elevation _____ ft. (NAVD88)</p> <p>B. Well casing, top elevation <u>504.32</u> ft. (NAVD88)</p> <p>C. Land surface elevation <u>502.13</u> ft. (NAVD88)</p> <p>D. Surface seal, bottom <u>501.1</u> ft. (NAVD88) or <u>1.0</u> ft.</p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>12. USCS classification of soil near screen: GP <input type="checkbox"/> GM <input type="checkbox"/> GC <input type="checkbox"/> GW <input checked="" type="checkbox"/> SW <input type="checkbox"/> SP <input type="checkbox"/> SM <input type="checkbox"/> SC <input type="checkbox"/> ML <input checked="" type="checkbox"/> MH <input type="checkbox"/> CL <input checked="" type="checkbox"/> CH <input type="checkbox"/> Bedrock <input type="checkbox"/></p> <p>13. Sieve analysis attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>14. Drilling method used: Rotary <input type="checkbox"/> Hollow Stem Auger <input type="checkbox"/> Sonic _____ Other <input checked="" type="checkbox"/></p> <p>15. Drilling fluid used: Water <input checked="" type="checkbox"/> 0.2 Air <input type="checkbox"/> Drilling Mud <input type="checkbox"/> 0.3 None <input type="checkbox"/></p> <p>16. Drilling additives used? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Describe _____</p> <p>17. Source of water (attach analysis, if required): _____ Onsite Potable Well</p> </div> <p>E. Bentonite seal, top <u>501.1</u> ft. (NAVD88) or <u>1.0</u> ft.</p> <p>F. Fine sand, top _____ ft. (NAVD88) or _____ ft.</p> <p>G. Filter pack, top <u>454.1</u> ft. (NAVD88) or <u>48.0</u> ft.</p> <p>H. Screen joint, top <u>452.1</u> ft. (NAVD88) or <u>50.0</u> ft.</p> <p>I. Well bottom <u>442.1</u> ft. (NAVD88) or <u>60.0</u> ft.</p> <p>J. Filter pack, bottom <u>442.1</u> ft. (NAVD88) or <u>60.0</u> ft.</p> <p>K. Borehole, bottom <u>442.1</u> ft. (NAVD88) or <u>60.0</u> ft.</p> <p>L. Borehole, diameter <u>6.0</u> in.</p> <p>M. O.D. well casing <u>2.38</u> in.</p> <p>N. I.D. well casing <u>2.07</u> in.</p>		<p>1. Cap and lock? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>2. Protective cover pipe: a. Inside diameter: <u>4.0</u> in. b. Length: <u>5.0</u> ft. c. Material: Steel <input checked="" type="checkbox"/> Other <input type="checkbox"/> d. Additional protection? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: <u>Three steel bollards</u></p> <p>3. Surface seal: Bentonite <input type="checkbox"/> Concrete <input checked="" type="checkbox"/> Other <input type="checkbox"/></p> <p>4. Material between well casing and protective pipe: Bentonite <input checked="" type="checkbox"/> Sand _____ Other <input checked="" type="checkbox"/></p> <p>5. Annular space seal: a. Granular/Chipped Bentonite <input checked="" type="checkbox"/> b. _____ Lbs/gal mud weight . . . Bentonite-sand slurry <input type="checkbox"/> c. _____ Lbs/gal mud weight . . . Bentonite slurry <input type="checkbox"/> d. <u>30</u> % Bentonite . . . Bentonite-cement grout <input checked="" type="checkbox"/> e. _____ Ft³ volume added for any of the above f. How installed: Tremie <input type="checkbox"/> Tremie pumped <input checked="" type="checkbox"/> Gravity <input type="checkbox"/></p> <p>6. Bentonite seal: a. Bentonite granules <input type="checkbox"/> b. <input type="checkbox"/> 1/4 in. <input checked="" type="checkbox"/> 3/8 in. <input type="checkbox"/> 1/2 in. Bentonite chips <input checked="" type="checkbox"/> c. _____ Other <input type="checkbox"/></p> <p>7. Fine sand material: Manufacturer, product name & mesh size a. _____ b. Volume added _____ ft³</p> <p>8. Filter pack material: Manufacturer, product name & mesh size a. <u>Red Flint Sand and Gravel, Well Pack</u> b. Volume added _____ ft³</p> <p>9. Well casing: Flush threaded PVC schedule 40 <input checked="" type="checkbox"/> Flush threaded PVC schedule 80 <input type="checkbox"/> _____ Other <input type="checkbox"/></p> <p>10. Screen material: <u>Schedule 40 PVC</u> a. Screen Type: Factory cut <input checked="" type="checkbox"/> Continuous slot <input type="checkbox"/> _____ Other <input type="checkbox"/> b. Manufacturer _____ c. Slot size: <u>0.010</u> in. d. Slotted length: <u>10.0</u> ft.</p> <p>11. Backfill material (below filter pack): None <input checked="" type="checkbox"/> Other <input type="checkbox"/></p>
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I hereby certify that the information on this form is true and correct to the best of my knowledge. Date Modified: 11/4/2015

Signature <i>[Handwritten Signature]</i>	Firm Natural Resource Technology 234 W. Florida Street, Floor 5, Milwaukee, WI 53204	Tel: (414) 837-3607 Fax: (414) 837-3608
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Facility/Project Name Hennepin Power Station		Local Grid Location of Well _____ ft. <input type="checkbox"/> N. _____ ft. <input type="checkbox"/> E. <input type="checkbox"/> S. _____ ft. <input type="checkbox"/> W.		Well Name 48	
Facility License, Permit or Monitoring No.		Local Grid Origin <input type="checkbox"/> (estimated: <input type="checkbox"/>) or Well Location <input checked="" type="checkbox"/>		Date Well Installed 08/11/2015	
Facility ID		Lat. <u>41° 18' 18.816"</u> Long. <u>-89° 18' 17.753"</u> or		Well Installed By: (Person's Name and Firm) Jason Drabek	
Type of Well mw		St. Plane <u>1,690,545.64</u> ft. N, <u>2,533,337.84</u> ft. E. E/W		Section Location of Waste/Source _____ 1/4 of _____ 1/4 of Sec. _____, T. _____ N, R. _____ <input type="checkbox"/> E <input type="checkbox"/> W	
Distance from Waste/Source ft.		Location of Well Relative to Waste/Source u <input type="checkbox"/> Upgradient s <input type="checkbox"/> Sidegradient d <input checked="" type="checkbox"/> Downgradient n <input type="checkbox"/> Not Known		Gov. Lot Number _____	
State Illinois				Cascade Drilling	

<p>A. Protective pipe, top elevation _____ ft. (NAVD88)</p> <p>B. Well casing, top elevation <u>487.46</u> ft. (NAVD88)</p> <p>C. Land surface elevation <u>485.19</u> ft. (NAVD88)</p> <p>D. Surface seal, bottom <u>484.2</u> ft. (NAVD88) or <u>1.0</u> ft.</p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>12. USCS classification of soil near screen: GP <input type="checkbox"/> GM <input type="checkbox"/> GC <input type="checkbox"/> GW <input checked="" type="checkbox"/> SW <input type="checkbox"/> SP <input type="checkbox"/> SM <input type="checkbox"/> SC <input type="checkbox"/> ML <input type="checkbox"/> MH <input type="checkbox"/> CL <input type="checkbox"/> CH <input type="checkbox"/> Bedrock <input type="checkbox"/></p> <p>13. Sieve analysis attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>14. Drilling method used: Rotary <input type="checkbox"/> Hollow Stem Auger <input type="checkbox"/> _____ Sonic _____ Other <input checked="" type="checkbox"/></p> <p>15. Drilling fluid used: Water <input checked="" type="checkbox"/> 0.2 Air <input type="checkbox"/> Drilling Mud <input type="checkbox"/> 0.3 None <input type="checkbox"/></p> <p>16. Drilling additives used? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Describe _____</p> <p>17. Source of water (attach analysis, if required): _____ Onsite Potable Well</p> </div> <p>E. Bentonite seal, top <u>484.2</u> ft. (NAVD88) or <u>1.0</u> ft.</p> <p>F. Fine sand, top _____ ft. (NAVD88) or _____ ft.</p> <p>G. Filter pack, top <u>444.2</u> ft. (NAVD88) or <u>41.0</u> ft.</p> <p>H. Screen joint, top <u>441.2</u> ft. (NAVD88) or <u>44.0</u> ft.</p> <p>I. Well bottom <u>431.2</u> ft. (NAVD88) or <u>54.0</u> ft.</p> <p>J. Filter pack, bottom <u>431.2</u> ft. (NAVD88) or <u>54.0</u> ft.</p> <p>K. Borehole, bottom <u>431.2</u> ft. (NAVD88) or <u>54.0</u> ft.</p> <p>L. Borehole, diameter <u>6.0</u> in.</p> <p>M. O.D. well casing <u>2.38</u> in.</p> <p>N. I.D. well casing <u>2.07</u> in.</p>		<p>1. Cap and lock? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>2. Protective cover pipe: a. Inside diameter: <u>4.0</u> in. b. Length: <u>5.0</u> ft. c. Material: Steel <input checked="" type="checkbox"/> Other <input type="checkbox"/> d. Additional protection? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: <u>Three steel bollards</u></p> <p>3. Surface seal: Bentonite <input type="checkbox"/> Concrete <input checked="" type="checkbox"/> Other <input type="checkbox"/></p> <p>4. Material between well casing and protective pipe: Bentonite <input checked="" type="checkbox"/> Sand _____ Other <input checked="" type="checkbox"/></p> <p>5. Annular space seal: a. Granular/Chipped Bentonite <input checked="" type="checkbox"/> b. _____ Lbs/gal mud weight . . . Bentonite-sand slurry <input type="checkbox"/> c. _____ Lbs/gal mud weight . . . Bentonite slurry <input type="checkbox"/> d. _____ % Bentonite . . . Bentonite-cement grout <input type="checkbox"/> e. _____ Ft³ volume added for any of the above f. How installed: Tremie <input type="checkbox"/> Tremie pumped <input type="checkbox"/> Gravity <input checked="" type="checkbox"/></p> <p>6. Bentonite seal: a. Bentonite granules <input type="checkbox"/> b. <input type="checkbox"/> 1/4 in. <input checked="" type="checkbox"/> 3/8 in. <input type="checkbox"/> 1/2 in. Bentonite chips <input checked="" type="checkbox"/> c. _____ Other <input type="checkbox"/></p> <p>7. Fine sand material: Manufacturer, product name & mesh size a. _____ b. Volume added _____ ft³</p> <p>8. Filter pack material: Manufacturer, product name & mesh size a. <u>Red Flint Sand and Gravel, Well Pack</u> b. Volume added _____ ft³</p> <p>9. Well casing: Flush threaded PVC schedule 40 <input checked="" type="checkbox"/> Flush threaded PVC schedule 80 <input type="checkbox"/> _____ Other <input type="checkbox"/></p> <p>10. Screen material: <u>Schedule 40 PVC</u> a. Screen Type: Factory cut <input checked="" type="checkbox"/> Continuous slot <input type="checkbox"/> _____ Other <input type="checkbox"/> b. Manufacturer _____ c. Slot size: <u>0.010</u> in. d. Slotted length: <u>10.0</u> ft.</p> <p>11. Backfill material (below filter pack): None <input checked="" type="checkbox"/> Other <input type="checkbox"/></p>
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I hereby certify that the information on this form is true and correct to the best of my knowledge. Date Modified: 11/4/2015

Signature <i>John Drabek</i>	Firm Natural Resource Technology 234 W. Florida Street, Floor 5, Milwaukee, WI 53204	Tel: (414) 837-3607 Fax: (414) 837-3608
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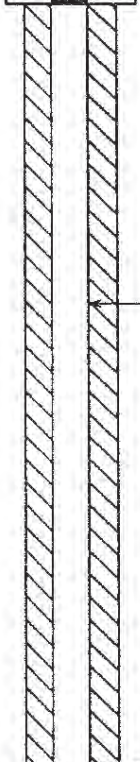
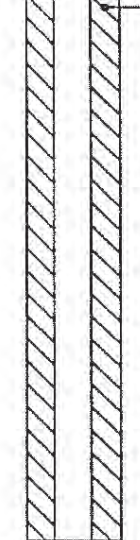
**APPENDIX A
BORING LOGS AND WELL CONSTRUCTION LOGS
STMI BORING LOGS AND WELL CONSTRUCTION
LOGS**

Monitoring Well No. 10

PROJECT: Hennepin East Ash Impoundment
 DRILL RIG: Rotasonic Drill
 DRILLER: Boart Longyear

DATE: 03-28-95
 HOLE DIA.: 6 in.
 GW DEPTH: Not Measured ft.

LOGGED BY: Hensel/Tu
 SAMPLER: Core Barrel
 HOLE ELEV.: 495.10 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
Blind Drilling (Refer to boring log for MW 11 for lithologic descriptions)			<div style="display: flex; flex-direction: column; align-items: center;"> <div style="margin-bottom: 5px;">0</div> <div style="margin-bottom: 5px;">1</div> <div style="margin-bottom: 5px;">2</div> <div style="margin-bottom: 5px;">3</div> <div style="margin-bottom: 5px;">4</div> <div style="margin-bottom: 5px;">5</div> <div style="margin-bottom: 5px;">6</div> <div style="margin-bottom: 5px;">7</div> <div style="margin-bottom: 5px;">8</div> <div style="margin-bottom: 5px;">9</div> <div style="margin-bottom: 5px;">10</div> <div style="margin-bottom: 5px;">11</div> <div style="margin-bottom: 5px;">12</div> <div style="margin-bottom: 5px;">13</div> <div style="margin-bottom: 5px;">14</div> <div style="margin-bottom: 5px;">15</div> <div style="margin-bottom: 5px;">16</div> <div style="margin-bottom: 5px;">17</div> <div style="margin-bottom: 5px;">18</div> <div style="margin-bottom: 5px;">19</div> <div style="margin-bottom: 5px;">20</div> </div>		<div style="text-align: center; margin-bottom: 10px;">  <p>Well Cap</p> </div> <div style="text-align: center;">  <p>2 in. Schedule 40 PVC</p> </div> <div style="text-align: center; margin-top: 10px;">  <p>Cement/Bentonite Grout</p> </div>

STMI

2511 N. 124th St. Suite 205
 Brookfield, Wisconsin 53005-8208

Notes:

Sample 10-1 was collected between 45-55 feet

Project No.
135-1.21

Monitoring Well No. 10

PROJECT: Hennepin East Ash Impoundment
 DRILL RIG: Rotasonic Drill
 DRILLER: Boart Longyear

DATE: 03-28-95
 HOLE DIA.: 6 in.
 GW DEPTH: Not Measured ft.

LOGGED BY: Hensel/Tu
 SAMPLER: Core Barrel
 HOLE ELEV.: 495.10 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
Blind Drilling (Refer to boring log for MW 11 for lithologic descriptions)			20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40		

STMI
 2511 N. 124th St. Suite 205
 Brookfield, Wisconsin 53005-8208

Notes:
 Sample 10-1 was collected between 45-55 feet


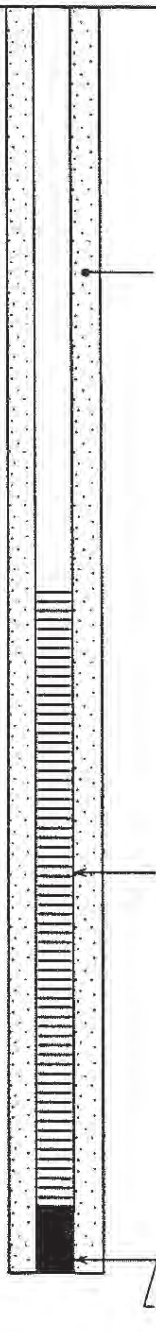

Project No.
 135-1.21
 Page 2 of 3

Monitoring Well No. 10

PROJECT: Hennepin East Ash Impoundment
 DRILL RIG: Rotosonic Drill
 DRILLER: Boart Longyear

DATE: 03-28-95
 HOLE DIA.: 6 in.
 GW DEPTH: Not Measured ft.

LOGGED BY: Hensel/Tu
 SAMPLER: Core Barrel
 HOLE ELEV.: 495.10 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
<p>Clean, fine to coarse gravels w/ cobbles up to 4" in diameter, well rounded to subangular</p>			<p>40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55</p>	<p>10-1</p>	 <p style="text-align: right; margin-right: 20px;">Formation Collapse</p> <p style="text-align: right; margin-right: 20px;">0.01 Slotted well screen</p> <p style="text-align: right; margin-right: 20px;">Sediment Trap</p>
<p>Blind Drilling (Refer to boring log for MW 11 for lithologic descriptions)</p>			<p>56 57 58 59 60</p>		

STMI

2511 N. 124th St. Suite 205
 Brookfield, Wisconsin 53005-8208

Notes:

Sample 10-1 was collected between 45-55 feet


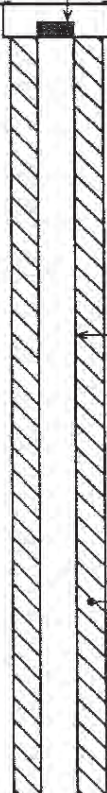

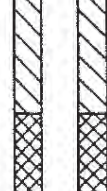

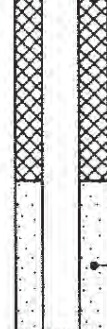
Project No.
135-1.21

Monitoring Well No. 11

PROJECT: Hennepin East Ash Impoundment
DRILL RIG: Rotasonic Drill
DRILLER: Boart Longyear

DATE: 03-27-95
HOLE DIA.: 6 in.
GW DEPTH: 50 ft.

LOGGED BY: Hensel/Tu
SAMPLER: Core barrel
HOLE ELEV.: 494.84 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
<p>Fill, consisting of poorly sorted sand, gravels (gravels up to 3") and crushed limestone</p>			0 1 2 3 4 5 6 7 8 9 10 11 12		<p style="text-align: center;">Well Cap</p>  <p style="text-align: center;">2 in. Schedule 40 PVC</p> <p style="text-align: center;">Cement/Bentonite Grout</p>
<p>Olive, silty clay w/ gravels up to 2", and some fine sand</p>			13 14 15	11-1	 <p style="text-align: center;">Bentonite Pellet Seal</p>
<p>Dry, brown, med sand to coarse gravel, cobbles up to 4"</p>			16 17 18 19 20		 <p style="text-align: center;">Fine Sand Pack</p>

STMI

2511 N. 124th St. Suite 205
 Brookfield, Wisconsin 53005-8208

Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples



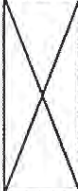

Project No.
135-1.21

Monitoring Well No. 11

PROJECT: Hennepin East Ash Impoundment
DRILL RIG: Rotosonic Drill
DRILLER: Boart Longyear

DATE: 03-27-95
HOLE DIA.: 6 in.
GW DEPTH: 50 ft.

LOGGED BY: Hensel/Tu
SAMPLER: Core barrel
HOLE ELEV.: 494.84 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
Dry, brown, med. sand to coarse gravel, gravels up to 2" in diameter, subrounded to subangular			20 21 22 23 24 25 26 27 28 29 30 31 32	11-2	 <p style="text-align: right; margin-right: 20px;">Formation Collapse</p> <p style="text-align: right; margin-right: 20px;">2 in. 40 Schedule PVC</p>
No sample			33 34 35		
Brown, dry coarse sand and gravel, some silt, some clay, cobbles up to 4", subangular to rounded			36 37 38 39 40	11-3	

STMI

2511 N. 124th St. Suite 205
 Brookfield, Wisconsin 53005-8208

Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples

Project No.
135-1.21

Monitoring Well No. 11

PROJECT: Hennepin East Ash Impoundment
DRILL RIG: Rotosonic Drill
DRILLER: Boart Longyear

DATE: 03-27-95
HOLE DIA.: 6 in.
GW DEPTH: 50 ft.

LOGGED BY: Hensel/Tu
SAMPLER: Core barrel
HOLE ELEV.: 494.84 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
Grading from fine to coarse sand w/ some gravels and fines			40 41 42 43 44 45 46		<p style="text-align: right;">Formation Collapse</p>
2' Dark brown, sandy clay w/ gravels			47 48	11-4	
Coarse sand and gravel, some silt, gravels to 2", subrounded to subangular, fines may have been washed out during drilling			49 50 51 52 53 54 55 56		<p style="text-align: right;">2 in. Schedule 40 PVC</p>
Coarse sand and gravel, some silt; well rounded, gravels up to 2"			57 58		
Clean fine to coarse gravel, gravels up to 3"			59 60		

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Notes:
 Continuously sampled bore-hole. Sample numbers refer to saved samples

Project No.
 135-121
 Page 3 of 4

Monitoring Well No. 11

PROJECT: Hennepin East Ash Impoundment

DATE: 03-27-95

LOGGED BY: Hensel/Tu

DRILL RIG: Rotosonic Drill

HOLE DIA.: 6 in.

SAMPLER: Core barrel

DRILLER: Boart Longyear

GW DEPTH: 50 ft.

HOLE ELEV.: 494.84 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
		60			
		61			
		62			
		63			
		64	11-5		
		65			
		66			
		67	11-6		
		68			
		69			
Brown, well sorted, clean med. sand w/ small gravels 1" in diameter		70			
		71			
		72			
		73			
Brown, fine uniform sand		74			
		75			
		76	11-7		
		77			
		78			
		79			
		80			

0.01 Slotted Well screen

Sediment Trap

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Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples

Project No.
135-1.21

Monitoring Well No. 12

PROJECT: Hennepin East Ash Impoundment
DRILL RIG: Rotosonic Drill
DRILLER: Boart Longyear

DATE: 03-28-95
HOLE DIA.: 6 in.
GW DEPTH: 48.5 ft.

LOGGED BY: Hensel/Tu
SAMPLER: Core Barrel
HOLE ELEV.: 494.84 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
<p>Blind Drilling (Refer to boring log for MW 13 for lithologic descriptions)</p>			0 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20		<p style="text-align: center;">WELL CONSTRUCTION DETAIL</p> <p style="text-align: right;">Well Cap</p> <p style="text-align: right;">2 in. Schedule 40 PVC</p> <p style="text-align: right;">Cement/Bentonite Grout</p>

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Notes:

No samples were collected from MW 12

Project No.
135-121

Page 1 of 3

Monitoring Well No. 12

PROJECT: Hennepin East Ash Impoundment
DRILL RIG: Rotosonic Drill
DRILLER: Boart Longyear

DATE: 03-28-95
HOLE DIA.: 6 in.
GW DEPTH: 48.5 ft.

LOGGED BY: Hensel/Tu
SAMPLER: Core Barrel
HOLE ELEV.: 494.84 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
<p>Blind Drilling (Refer to boring log for MW 13 for lithologic descriptions)</p>			20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40		<p style="text-align: right;">2 in. Schedule 40 PVC</p> <p style="text-align: right;">Bentonite Pellet Seal</p> <p style="text-align: right;">Fine sand Pack</p> <p style="text-align: right;">Formation Collapse</p>

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Notes:

No samples were collected from MW 12

Project No.
135-121

Monitoring Well No. 12

PROJECT: Hennepin East Ash Impoundment

DATE: 03-28-95

LOGGED BY: Hensei/Tu

DRILL RIG: Rotasonic Drill

HOLE DIA.: 6 in.

SAMPLER: Core Barrel

DRILLER: Boart Longyear

GW DEPTH: 48.5 ft.

HOLE ELEV.: 494.84 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
<p>Blind Drilling (Refer to boring log for MW 13 for lithologic descriptions)</p>			<p>40</p> <p>41</p> <p>42</p> <p>43</p> <p>44</p> <p>45</p> <p>46</p> <p>47</p> <p>48</p> <p>49</p> <p>50</p> <p>51</p> <p>52</p> <p>53</p> <p>54</p> <p>55</p> <p>56</p> <p>57</p> <p>58</p> <p>59</p> <p>60</p>		<p style="text-align: right;">Formation Collapse</p> <p style="text-align: right;">2 in. Schedule 40 PVC</p> <p style="text-align: right;">0.01 Slotted well screen</p> <p style="text-align: right;">Sediment Trap</p>

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Notes:

No samples were collected from MW 12

Project No.
135-121

Page 3 of 3

Monitoring Well No. 13

PROJECT: Hennepin East Ash Impoundment
DRILL RIG: Rotosonic Drill
DRILLER: Boart Longyear

DATE: 03-28-95
HOLE DIA.: 6 in.
GW DEPTH: 49.5 ft.

LOGGED BY: Hensel/Tu
SAMPLER: Core Barrel
HOLE ELEV.: 494.82 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
			0		<p style="text-align: right;">Well Cap</p> <p style="text-align: right;">2 in. Schedule 40 PVC</p> <p style="text-align: right;">Cement/Bentonite Grout</p>
Fill, consisting of olive, silty clay loam, with gravels up 3 in in diameter		X	1		
		X	2		
		X	3		
		X	4		
Fly ash		■	5		
		X	6		
Brown gravel w/ sand and silt, gravels up to 3", poorly sorted, subrounded to subangular		X	7		
		X	8		
		X	9		
		X	10		
		X	11		
		X	12		
Fly ash		■	13		
Fill, consisting of fine silty sand, wood chips, gravels up to 1"		X	14		
		X	15		
Tan sand and gravel, some silt, gravels up to 3", poorly sorted, rounded		○	16		
		○	17		
		○	18		
		○	19		
		○	20		

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Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples

Project No.
135-1.21

Monitoring Well No. 13

PROJECT: Hennepin East Ash Impoundment
DRILL RIG: Rotosonic Drill
DRILLER: Boart Longyear

DATE: 03-28-95
HOLE DIA.: 6 in.
GW DEPTH: 49.5 ft.

LOGGED BY: Hensel/Tu
SAMPLER: Core Barrel
HOLE ELEV.: 494.82 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
		20			
		21			
		22		13-1	
		23			
		24			
		25			
		26			
		27			
		28			
Brown, fine silty, sandy clay w/ gravels (well-rounded)		29			
		30			
Gray, fine to coarse sand and gravel, well-rounded		31		13-2	
		32			
		33			
Red, silty, sandy clay w/ gravels up to 2" in diameter		34			
		35			
White, fine sand w/ gravels up to 3"		36			
		37			
		38			
Brown, coarse sand and gravel with silt, cobbles up to 4"		39			
		40			

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Notes:
 Continuously sampled bore-hole. Sample numbers refer to saved samples

Project No.
 135-121
 Page 2 of 4

Monitoring Well No. 13

PROJECT: Hennepin East Ash Impoundment
DRILL RIG: Rotasonic Drill
DRILLER: Boart Longyear

DATE: 03-28-95
HOLE DIA.: 6 in.
GW DEPTH: 49.5 ft.

LOGGED BY: Hensel/Tu
SAMPLER: Core Barrel
HOLE ELEV.: 494.82 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
Gravel becomes finer		60 61 62 63 64	13-5		<p style="text-align: right;">Formation Collapse</p> <p style="text-align: right;">2 in. Schedule 40 PVC</p> <p style="text-align: right;">0.01 Slotted Well screen</p> <p style="text-align: right;">Sediment Trap</p>
Brown, fine gravel w/ little silt and sand, well rounded, well sorted		65 66 67 68 69 70 71	13-6		
Fine, uniform silty sand w/ cobbles up to 3"		72			
Brown, uniform fine to med. sand with some gravel		73 74			
		75 76 77 78 79 80			

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Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples

Project No.
135-121

Monitoring Well No. 15

PROJECT: Hennepin East Ash Impoundment
DRILL RIG: Rotasonic Drill
DRILLER: Boart Longyear

DATE: 03-29-95
HOLE DIA.: 6 in.
GW DEPTH: Not Measured ft.

LOGGED BY: Hensel/Tu
SAMPLER: Core barrel
HOLE ELEV.: 494.41 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
			0		<p style="text-align: right;">Well Cap</p> <p style="text-align: right;">2 in. Schedule 40 PVC</p> <p style="text-align: right;">Cement/Bentonite Grout</p>
Fill, consisting of poorly sorted sand, gravels		X	1		
		X	2		
		X	3		
Fly ash		■	4		
Fill, consisting of poorly sorted sand, gravels up to 3"		X	5		
		X	6		
		X	7		
		X	8		
Bottom ash		■	9		
		■	10	15-1	
		■	11		
		■	12		
		■	13		
		■	14		
		■	15		
		■	16		
Fly ash		■	17	15-2	
		■	18		
		■	19		
		■	20		

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Notes:
 Continuously sampled bore-hole. Sample numbers refer to saved samples

Project No.
 135-121
 Page 1 of 3

Monitoring Well No. 15

PROJECT: Hennepin East Ash Impoundment

DATE: 03-29-95

LOGGED BY: Hensel/Tu

DRILL RIG: Rotosonic Drill

HOLE DIA.: 6 in.

SAMPLER: Core barrel

DRILLER: Boart Longyear

GW DEPTH: Not Measured ft.

HOLE ELEV.: 494.41 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
Same as above			20 21 22 23 24	15-2	<p style="font-size: small;">Cement/Bentonite Grout</p> <p style="font-size: small;">2 in. Schedule 40 PVC</p> <p style="font-size: small;">Bentonite Pellet Seal</p> <p style="font-size: small;">Fine Sand Pack</p> <p style="font-size: small;">Formation Collapse</p>
Brown uniform silt w/ organic matter			25 26	15-3	
White gravel w/ sand and gravels up to 1.5"			27 28 29 30	15-4	
Brown gravel w/ silty, fine-med. sand, rounded to subrounded			31 32 33 34 35 36 37	15-5	
			38 39	15-6	
			40		

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Brookfield, Wisconsin 53005-8208

Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples

Project No.

135-1.21

Monitoring Well No. 15

PROJECT: Hennepin East Ash Impoundment

DATE: 03-29-95

LOGGED BY: Hensel/Tu

DRILL RIG: Rotosonic Drill

HOLE DIA.: 6 in.

SAMPLER: Core barrel

DRILLER: Boart Longyear

GW DEPTH: Not Measured ft.

HOLE ELEV.: 494.41 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
Same as above			40 41 42 43 44 45 46 47 48 49 50	15-6	<p style="margin-left: 20px;">2 in. Schedule 40 PVC</p> <p style="margin-left: 20px;">0.01 Slotted Well screen</p> <p style="margin-left: 20px;">Sediment Trap</p>
Olive fine sand and silt, platy structure, well sorted			50 51	15-7	
Gravel w/ some sand, some silt, generally finer gravel than above			52 53 54 55 56 57 58 59 60	15-8	

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Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples

Project No.
135-1.21

Monitoring Well No. 16

PROJECT: Hennepin East Ash Impoundment

DATE: 03-30-95

LOGGED BY: Hensel/Tu

DRILL RIG: Rotosonic Drill

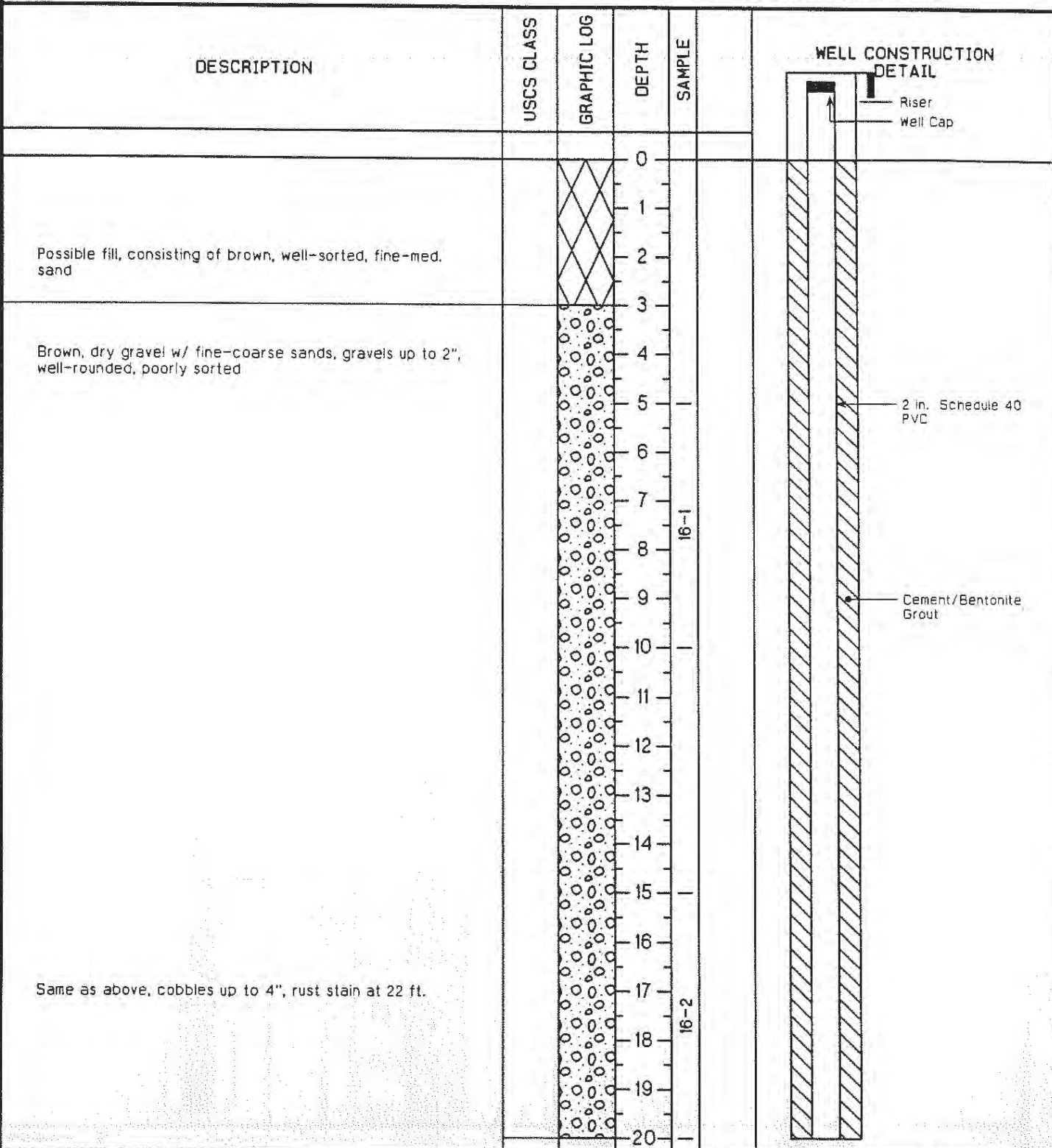
HOLE DIA.: 6 in.

SAMPLER: Core barrel

DRILLER: Boart Longyear

GW DEPTH: 53 ft.

HOLE ELEV.: 502.09 ft. MSL



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Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples

Project No.
135-1.21

Monitoring Well No. 16

PROJECT: Hennepin East Ash Impoundment

DATE: 03-30-95

LOGGED BY: Hensel/Tu

DRILL RIG: Rotosonic Drill



HOLE DIA.: 6 in.

SAMPLER: Core barrel

DRILLER: Boart Longyear

GW DEPTH: 53 ft.

HOLE ELEV.: 502.09 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
<p>Brown gravel w/ fine to med. sand and silt (more sand than above), poorly sorted</p>			<p>40</p> <p>41</p> <p>42</p> <p>43</p> <p>44</p> <p>45</p> <p>46</p> <p>47</p> <p>48</p> <p>49</p> <p>50</p> <p>51</p> <p>52</p> <p>53</p> <p>54</p> <p>55</p> <p>56</p> <p>57</p> <p>58</p> <p>59</p> <p>60</p>	<p>16-5</p> <p>16-6</p>	 <p style="margin-left: 20px;">Fine Sand Pack</p> <p style="margin-left: 20px;">Formation Collapse</p> <p style="margin-left: 20px;">2 in. Schedule 40 PVC</p> <p style="margin-left: 20px;">0.01 Slotted Well Screen</p>

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Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples


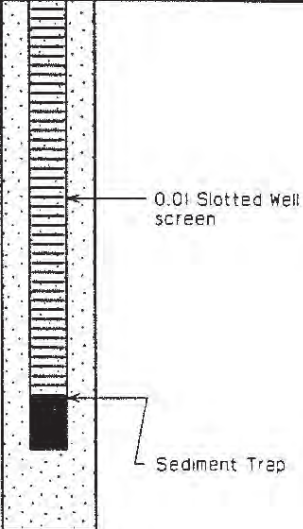
Project No.
135-1.21

Monitoring Well No. 16

PROJECT: Hennepin East Ash Impoundment
DRILL RIG: Rotasonic Drill
DRILLER: Boart Longyear

DATE: 03-30-95
HOLE DIA.: 6 in.
GW DEPTH: 53 ft.

LOGGED BY: Hensel/Tu
SAMPLER: Core barrel
HOLE ELEV.: 502.09 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
Same as above w/ more silt			60 61 62 63 64 65 66 67 68	16-7 16-8	 <p style="font-size: small;">0.01 Slotted Well screen</p> <p style="font-size: small;">Sediment Trap</p>
			69 70 71 72 73 74 75 76 77 78 79 80		

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Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples

Project No.
135-1.21

Monitoring Well No. 17

PROJECT: Hennepin East Ash Impoundment

DATE: 03-30-95

LOGGED BY: Hensel/Tu

DRILL RIG: Rotosonic Drill

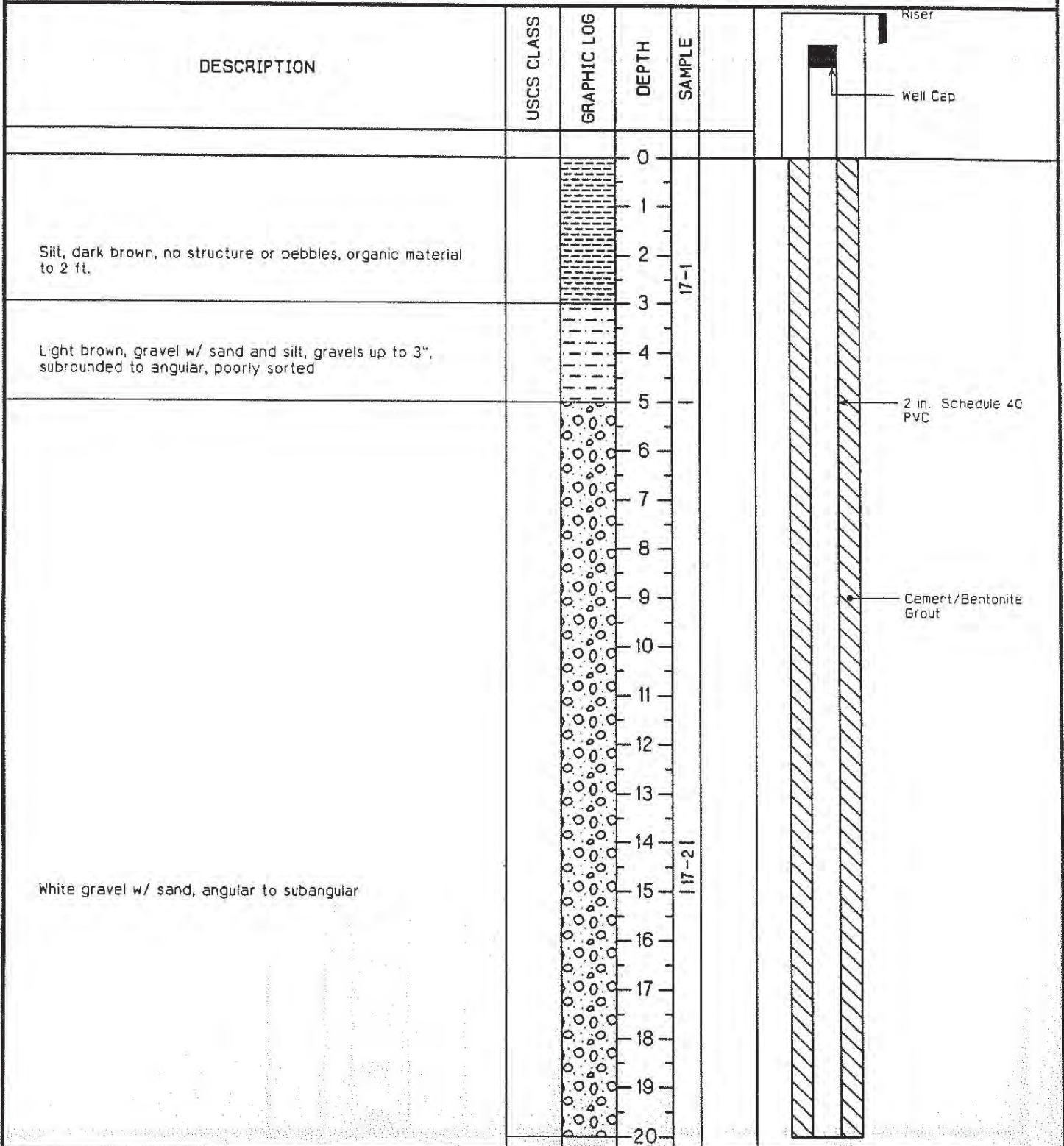
HOLE DIA.: 6 in.

SAMPLER: Core barrel

DRILLER: Boart Longyear

GW DEPTH: 56 ft.

HOLE ELEV.: 507.34 ft. MSL



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Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples


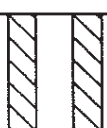

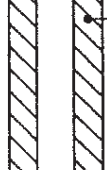



Project No.
135-1.21

Monitoring Well No. 17

PROJECT: Hennepin East Ash Impoundment
DRILL RIG: Rotasonic Drill
DRILLER: Boart Longyear

DATE: 03-30-95
HOLE DIA.: 6 in.
GW DEPTH: 56 ft.

LOGGED BY: Hensel/Tu
SAMPLER: Core barrel
HOLE ELEV.: 507.34 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
<p>Brown gravel w/ sand, some silt, poorly sorted, subangular to rounded</p>			20 21 22 23 24 25	17-3	 <p style="text-align: right;">Cement/Bentonite Grout</p>
<p>Same as above w/ more silt</p>			26 27 28 29 30 31 32 33 34 35	17-4	 <p style="text-align: right;">Bentonite Pellet Seal</p> <p style="text-align: right;">2 in. Schedule 40 PVC</p>
<p>2" lens of gray sand and gravel at 36 ft.</p>			36	17-5	 <p style="text-align: right;">Fine Sand Pack</p>
<p>Brownish-red gravel w/ sand and silt, poorly sorted, gravels up 1.5", rounded</p>			37 38 39 40	17-6	

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Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples


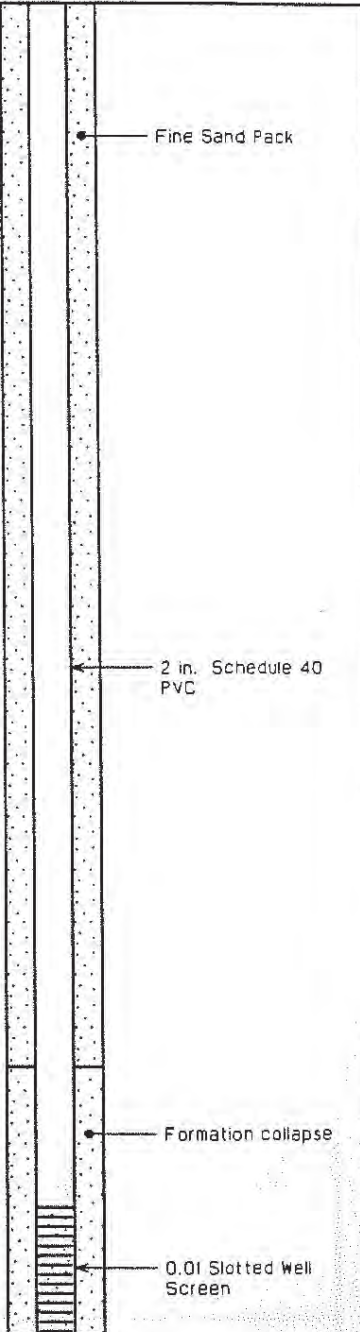

Project No.
135-1.21

Monitoring Well No. 17

PROJECT: Hennepin East Ash Impoundment
 DRILL RIG: Rotasonic Drill
 DRILLER: Boart Longyear

DATE: 03-30-95
 HOLE DIA.: 6 in.
 GW DEPTH: 56 ft.

LOGGED BY: Hensel/Tu
 SAMPLER: Core barrel
 HOLE ELEV.: 507.34 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
<p>Sequence of black and yellow sand and gravel</p> <p>Brown gravel w/ sand and silt, poorly sorted, gravels up to 1.5"</p>			<p>40 41 42 43 44 45 46 47 48</p>	<p>17-7 17-8 17-9</p>	 <p style="text-align: right;">Fine Sand Pack</p> <p style="text-align: right;">2 in. Schedule 40 PVC</p> <p style="text-align: right;">Formation collapse</p> <p style="text-align: right;">0.01 Slotted Well Screen</p>
<p>Brown, med. sand, well-sorted, dry</p> <p>↓</p> <p>Becomes wet at 56 ft. Same as above w/ few gravels</p>			<p>49 50 51 52 53 54 55 56 57 58 59 60</p>	<p>17-10 17-11</p>	

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Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples


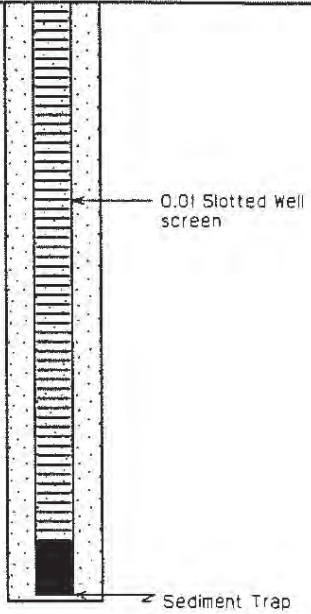
Project No.
135-1.21

Monitoring Well No. 17

PROJECT: Hennepin East Ash Impoundment
DRILL RIG: Rotasonic Drill
DRILLER: Boart Longyear

DATE: 03-30-95
HOLE DIA.: 6 in.
GW DEPTH: 56 ft.

LOGGED BY: Hensel/Tu
SAMPLER: Core barrel
HOLE ELEV.: 507.34 ft. MSL

DESCRIPTION	USCS CLASS	GRAPHIC LOG	DEPTH	SAMPLE	WELL CONSTRUCTION DETAIL
Same as above			60 61 62 63 64 65 66 67 68 69	17-12	 <p style="font-size: small;">0.01 Slotted well screen</p> <p style="font-size: small;">Sediment Trap</p>
			70 71 72 73 74 75 76 77 78 79 80		

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Notes:

Continuously sampled bore-hole. Sample numbers refer to saved samples

Project No.
135-121

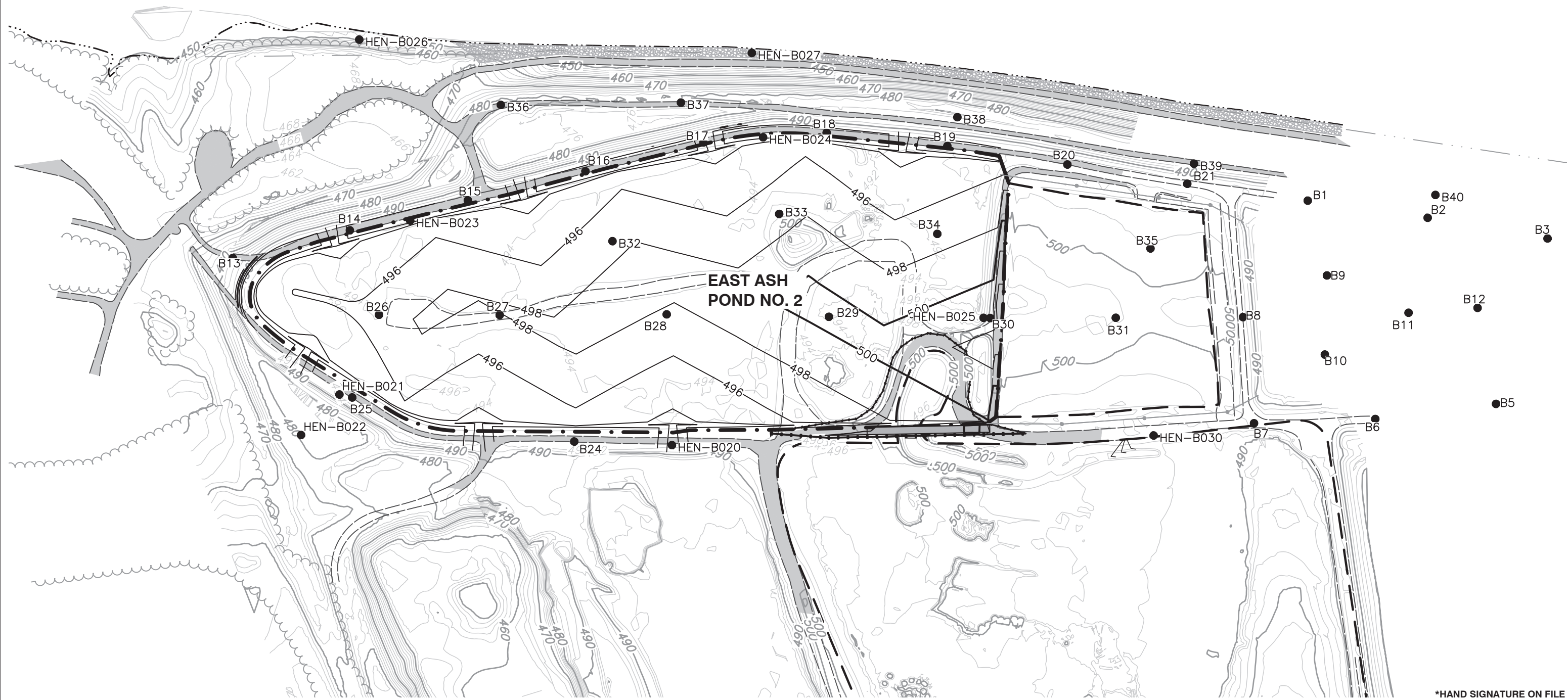
**APPENDIX A
BORING LOGS AND WELL CONSTRUCTION LOGS
CEC BORING LOGS**



NORTH

LEGEND

- EXISTING INDEX CONTOUR
- EXISTING INTERMEDIATE CONTOUR
- PROPOSED INDEX CONTOUR
- PROPOSED INTERMEDIATE CONTOUR
- TEST BORING LOCATION



*HAND SIGNATURE ON FILE

REFERENCE

1. TOPOGRAPHIC CONTOURS SHOWN ARE FROM AERIAL SURVEY COMPLETED BY SURDEX ON AUGUST 17, 2015 AND TOPOGRAPHIC/BATHYMETRIC SURVEY COMPLETED BY WEAVER CONSULTANTS GROUP ON SEPTEMBER 22, 2015.
2. TOPOGRAPHIC CONTOURS SHOWN OUTSIDE THE LIMIT OF 2015 TOPOGRAPHIC SURVEY WERE DERIVED FROM USGS NATIONAL ELEVATION DATASET (NED) 1/9 ARC-SECOND DIGITAL ELEVATION MODEL, DATED 2012.



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DYNEGY MIDWEST GENERATION, LLC.
HENNEPIN STATION
EAST ASH POND NO. 2

TEST BORING LOCATION PLAN

DRAWN BY:	JAH	CHECKED BY:	JMN	APPROVED BY:	*DMC	FIGURE NO.:	
DATE:	09/21/17	DWG SCALE:	1"=200'	PROJECT NO.:	171-101.0400		1

P:\2017\171-101-CAAD\DWG\GT01\171101-GT01-Boring Location Plan.dwg LS(10/9/2017 - jleidy) - LP: 10/16/2017 9:20 AM



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3041 Woodcreek Dr Suite 210
Downers Grove, IL 60510

BORING NUMBER B-5

PAGE 1 OF 3

CLIENT <u>Dynegy - Hennepin Power Station</u>	PROJECT NAME <u>Dry Ash Landfill Feasibility Study</u>
PROJECT NUMBER <u>082-255</u>	PROJECT LOCATION <u>Hennepin, Illinois</u>
DATE STARTED <u>2/17/09</u> COMPLETED <u>2/17/09</u>	GROUND ELEVATION <u>492.9 ft</u> BACKFILL <u>Cement Grout</u>
DRILLING CONTRACTOR <u>Groff Testing</u>	GROUND WATER LEVELS:
DRILLING METHOD <u>Hollow Stem Auger</u>	<input checked="" type="checkbox"/> WHILE DRILLING <u>45.1 ft / Elev 447.8 ft</u>
CEC REP <u>D. KORTH</u> CHECKED BY <u>MDJ</u>	AT END OF DRILLING <u>NA</u>
NOTES <u>Southeast Corner of Ash Pond on BERM</u>	AFTER DRILLING <u>NA</u>

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS	Pocket Pen. (tsf)	PID (ppm)	▲ SPT N VALUE ▲		
									PL	MC	LL
490		Brown poorly graded SAND AND GRAVEL FILL, moist, medium dense to dense. (BERM FILL)	0	SS 1	50	13 8 26 20	NP				
				SS 2	55	8 10 9 25	NP				
		Dark yellowish brown clayey SAND AND GRAVEL, to sandy CLAY, trace gravel, moist, medium dense, poorly graded. (BERM FILL)	5	SS 3	75	8 8 9 10	NP	8			
485		Very dark brown silty CLAY, moist, hard. (BERM FILL)		SS 4	85	4 4 8 7	4.5				
				SS 5	75	4 8 10 10	4.5				
		Very dark gray sandy SILT, moist, medium dense to dense. (ASH)	10	SS 6	80	8 15 30 25	NP	15			
480				SS 7	65	8 9 6 6	NP				
				SS 8	60	3 3 2 3	NP				
		Gray SILT, moist to wet, loose. (ASH)		SS 9	85	2 2 1 1	NP				44
475			Wet between 17.0 and 18.0 feet		SS 10	50	2 1 1 1	NP			

CEC CUSTOM LOG - DU STYLE - 082-255 Boring LOG.dwg, CEC TEMPLATE.DWT 4/6/09

(Continued Next Page)



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BORING NUMBER B-5

PAGE 2 OF 3

CLIENT Dynergy - Hennepin Power Station

PROJECT NAME Dry Ash Landfill Feasibility Study

PROJECT NUMBER 082-255

PROJECT LOCATION Hennepin, Illinois

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS	Pocket Pen (tsf)	PI/D (ppm)	▲ SPT N VALUE ▲					
									PL	MC	LL			
									20	40	60	80		
									20	40	60	80		
									□ UCS (tsf) □		20	40	60	80
470		Gray SILT, moist to wet, loose, (ASH) (continued)	20	SS 11	90	1 1 1	NP							
		Grades to wet below 23.0 feet		SS 12	75	1 1 1	NP					47		
		Dark grayish brown SILT, wet, very loose, laminated, (ASH)	25	SS 13	95	1 1 1	NP							
465				SS 14	100	0 0 1	NP							
				SS 15	100	0 1 1	NP					43		
			30	SS 16	90	1 1 2 8	NP							
460		Dark reddish brown SILT, trace sand and gravel, trace plant matter, moist, stiff, (STREAM TERRACE DEPOSIT)		SS 17	35	5 5 7 6	NP							
				SS 18	65	3 4 4 8	1.75					17		
		Dusky red silty CLAY, trace sand and gravel, moist, very stiff, (STREAM TERRACE DEPOSIT)		SS 19	100	2 5 12 10	2.25							
455				SS 20	100	2 5 12 10	2.25							
		Dark yellowish brown SAND AND GRAVEL, moist, medium dense, poorly graded, (GLACIAL OUTWASH)	40	SS 21	50	5 8 13 10	NP							
						10								

CEC CUSTOM LOG - DJ STYLE 0815 2015 BORING LOGS DPL CEC TEMPLATE.GDT 4/8/09

(Continued Next Page)



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BORING NUMBER B-5

PAGE 3 OF 3

CLIENT Dynegy - Hennepin Power Station

PROJECT NAME Dry Ash Landfill Feasibility Study

PROJECT NUMBER 082-255

PROJECT LOCATION Hennepin, Illinois

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS	Pocket Pen. (tsf)	PID (ppm)	▲ SPT N VALUE ▲		
									PL	MC LL	
450									20	40 60 80	
									20	40 60 80	
										20 40 60 80	
		Dark yellowish brown SAND AND GRAVEL, moist, medium dense, poorly graded, (GLACIAL OUTWASH) (continued)		SS 22	60	12 13 14	NP				
		Grades to wet at 45.1 feet	45	SS 23	75	9 10 11 12	NP				
					SS 24	0	4 6 9 16	NP			
445					SS 25	45	3 7 7 10	NP			13
			End of Borehole at 50.0 feet	50							

CEC_CUSTOM_LOG - D:/STYLE/082-255 BORING LOGS.GPJ CECTEMPLATE.GDT 4/8/09



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BORING NUMBER B-6

PAGE 1 OF 2

CLIENT <u>Dynergy - Hennepin Power Station</u>	PROJECT NAME <u>Dry Ash Landfill Feasibility Study</u>
PROJECT NUMBER <u>082-255</u>	PROJECT LOCATION <u>Hennepin, Illinois</u>
DATE STARTED <u>2/26/09</u> COMPLETED <u>2/26/09</u>	GROUND ELEVATION <u>494.5 ft</u> BACKFILL <u>Cement Grout</u>
DRILLING CONTRACTOR <u>Groff Testing</u>	GROUND WATER LEVELS:
DRILLING METHOD <u>Hollow Stem Auger</u>	WHILE DRILLING <u>Dry</u>
CEC REP <u>CAC</u> CHECKED BY <u>MDJ</u>	AT END OF DRILLING <u>--</u>
NOTES	AFTER DRILLING <u>--</u>

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS	Pocket Pen. (tsf)	PID (ppm)	▲ SPT N VALUE ▲	
									PL	MC
		Brown sandy GRAVEL, trace clay, medium sand, moist, medium dense, poorly graded, (BERM FILL)	0	SS 1	75	7 4 9 11	NP			
		Brown gray gravelly CLAY, some sand, moist, stiff, low to no plasticity, (BERM FILL)		SS 2	80	8 6 8 10	2.0		7	
490		Coarse gravel		SS 3	70	5 8 7 6	1.3			
		Dark gray to black silty CLAY, trace coarse gravel, to cobbles, moist, very stiff, low plasticity, (BERM FILL)		SS 4	100	11 13 6 13	3.75			
485		Dark gray sandy SILT, trace coal pieces, coarse sand, dry to moist, dense, non-plastic, (BERM FILL)	10	SS 5	100	4 8 8 10	3.5		21	
				SS 6	100	8 15 26 18	2.5			
				SS 7	0	5 5 6 6				
480		Dark gray to black silty CLAY, trace coarse gravel, with cobbles, moist, low plasticity, (BERM FILL)	15	SS 8	70	7 4 5 4				
				SS 9	50	5 4 5 10			18	
475		Gray sandy SILT moist to wet, (ASH)	20	SS 10	100	5 4 3 2	NP		32	

CEC_CUSTOM LOG - DL 57VLE - 082-255 BORING LOGS 24J - CECTEMPLATE.DOT 4/6/09

(Continued Next Page)



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BORING NUMBER B-6

PAGE 2 OF 2

CLIENT Dynegy - Hennepin Power Station

PROJECT NAME Dry Ash Landfill Feasibility Study

PROJECT NUMBER 082-255

PROJECT LOCATION Hennepin, Illinois

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS	Pocket Pen. (tsf)	PID (ppm)	▲ SPT N VALUE ▲					
									PL	MC	LL			
									20	40	60	80		
									20	40	60	80		
									□ UCS (tsf) □		20	40	60	80
		Gray sandy SILT, moist to wet, (ASH) (continued)	20	SS 11	0	2 2 2 3	NP							
		Brown gravelly CLAY, moist, medium dense, low plasticity, poorly graded, (STREAM TERRACE DEPOSIT)		SS 12	70	8 9 19 10	NP		9					
470		Tan medium SAND, trace fine gravel, dry to moist, medium dense, poorly graded, (STREAM TERRACE DEPOSIT)	25	SS 13	50	6 6 6 6	NP							
		Brown gravelly SAND, dry to moist, medium dense, non-plastic, poorly graded, (STREAM TERRACE DEPOSIT)		SS 14	25	20 22 15 10	NP							
		Sandy GRAVEL, dry, poorly graded, (GLACIAL OUTWASH)		SS 15	50	11 7 11 10	NP		5					
465			30	SS 16	50	11 12 40 40	NP							
				SS 17	75	18 30 70	NP							
460			35	SS 18	50	100	NP		8					
		End of Borehole at 36.0 feet												

CEC_CUSTOM_LOG - D3 STYLE 082-255 BORING LOGS.GPJ, CEC_TEMPLATE.GDT, 4/00/05



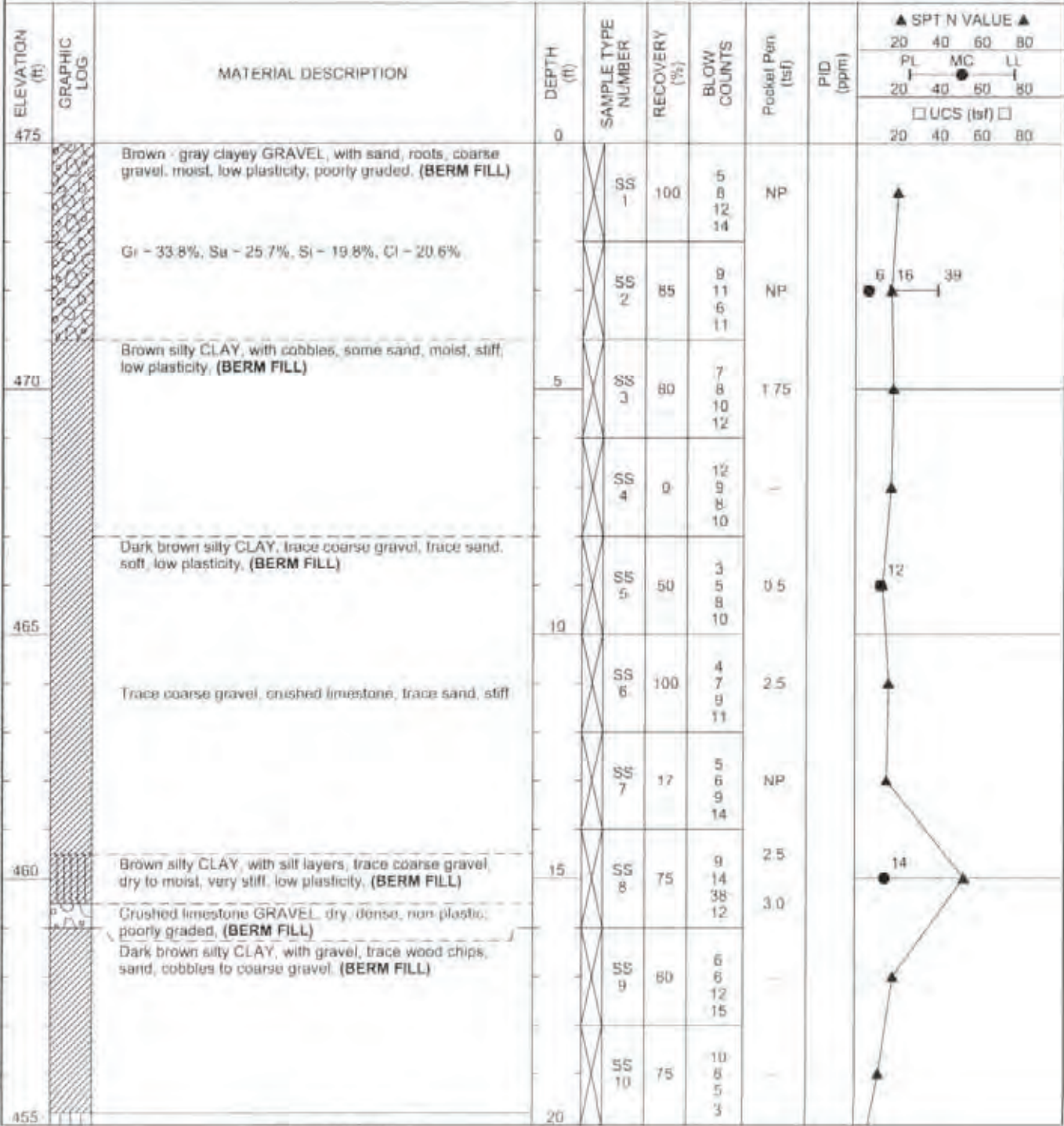
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BORING NUMBER B-7

PAGE 1 OF 2

CLIENT <u>Dynegy - Hennepin Power Station</u>	PROJECT NAME <u>Dry Ash Landfill Feasibility Study</u>
PROJECT NUMBER <u>082-255</u>	PROJECT LOCATION <u>Hennepin, Illinois</u>
DATE STARTED <u>2/27/09</u> COMPLETED <u>2/27/09</u>	GROUND ELEVATION <u>475 ft</u> BACKFILL <u>Cement Grout</u>
DRILLING CONTRACTOR <u>Groff Testing</u>	GROUND WATER LEVELS:
DRILLING METHOD <u>Hollow Stem Auger</u>	WHILE DRILLING <u>---</u>
CEC REP <u>CAC</u> CHECKED BY <u>MOJ</u>	AT END OF DRILLING <u>---</u>
NOTES _____	AFTER DRILLING <u>---</u>

CEC CUSTOM LOG - DJ STYLE (82-255 BORING LOGS.GPJ) CECTEMPLATE.GDT 4/6/09



(Continued Next Page)



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BORING NUMBER B-7

PAGE 2 OF 2

CLIENT Dynegy - Hennepin Power Station

PROJECT NAME Dry Ash Landfill Feasibility Study

PROJECT NUMBER 082-255

PROJECT LOCATION Hennepin, Illinois

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS	Pocket Pan (tsf)	PID (ppm)	▲ SPT N VALUE ▲
									20 40 60 80 PL MC LL 20 40 60 80 <input type="checkbox"/> UCS (tsf) <input type="checkbox"/> 20 40 60 80
455		Gray SILT, trace fine sand, moist to wet, loose, (ASH) <i>(continued)</i>	20	SS 11	90	2 1 1 5	NP		35
		SAND AND GRAVEL, limestone fragments, dry, medium dense to dense, non-plastic, (GLACIAL OUTWASH)		SS 12	70	14 14 14 12	NP		
450			25	SS 13	50	50 30 20	NP		
				SS 14	50	65 35	NP		8
		End of Borehole at 28.0 feet.							

CEC_CUSTOM_LOG - D:\STYLE\082255\BORING\LOGS\BPL_CECTEMPLATE.DOT 4/6/09

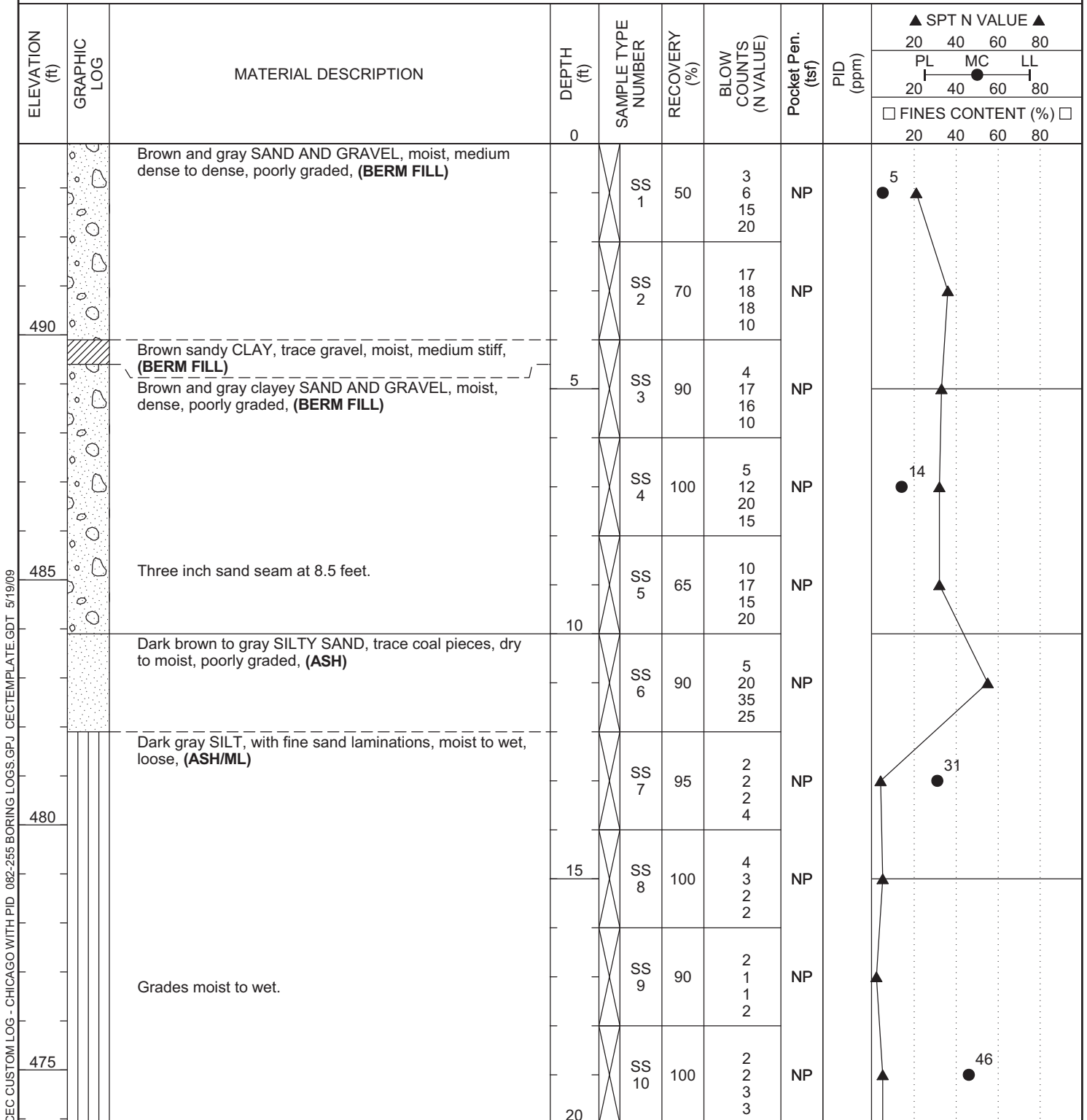


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BORING NUMBER B-18

PAGE 1 OF 2

CLIENT <u>Dynergy - Hennepin Power Station</u>	PROJECT NAME <u>Dry Ash Landfill Feasibility Study</u>
PROJECT NUMBER <u>082-255</u>	PROJECT LOCATION <u>Hennepin, Illinois</u>
DATE STARTED <u>3/6/09</u> COMPLETED <u>3/6/09</u>	GROUND ELEVATION <u>493.9 ft</u> BACKFILL <u>Cement Grout</u>
DRILLING CONTRACTOR <u>Groff Testing</u>	GROUND WATER LEVELS:
DRILLING METHOD <u>Hollow Stem Auger</u>	WHILE DRILLING <u>---</u>
CEC REP <u>CAC</u> CHECKED BY <u>MDJ</u>	AT END OF DRILLING <u>---</u>
NOTES	AFTER DRILLING <u>---</u>



(Continued Next Page)

CEC CUSTOM LOG - CHICAGO WITH PID 082-255 BORING LOGS.GPJ CECTEMPLATE.GDT 5/19/09



CLIENT Dynegy - Hennepin Power Station

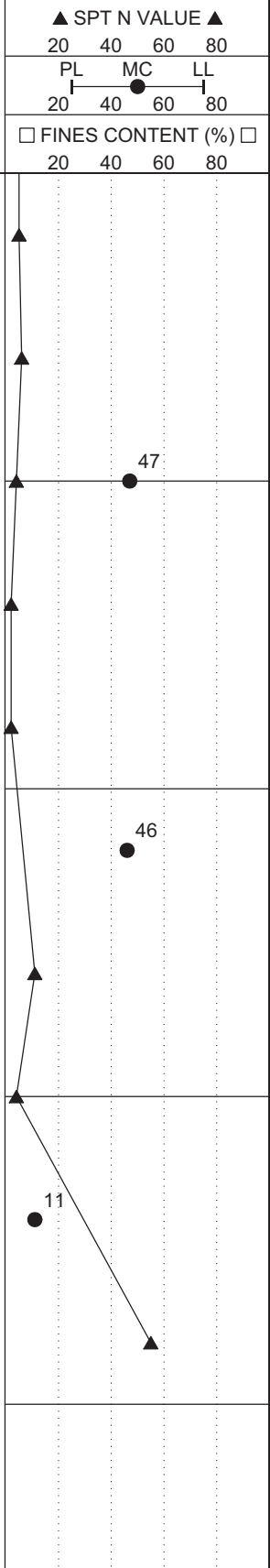
PROJECT NAME Dry Ash Landfill Feasibility Study

PROJECT NUMBER 082-255

PROJECT LOCATION Hennepin, Illinois

CEC CUSTOM LOG - CHICAGO WITH PID 082-255 BORING LOGS.GPJ CECTEMPLATE.GDT 5/19/09

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS (N VALUE)	Pocket Pen. (tsf)	PID (ppm)	▲ SPT N VALUE ▲					
									20	40	60	80		
470		Dark gray SILT, with fine sand laminations, moist to wet, loose, (ASH/ML) (continued)	20	SS 11	100	3 3 2 2	NP							
				SS 12	100	3 3 3 2	NP							
		Grades moist to wet.	25	SS 13	90	3 2 2 1	NP				47			
				SS 14	90	2 1 1 2	NP							
465				SS 15	90	2 1 1 1	NP							
		Grades to moist.	30	ST 16	100		NP					46		
		Gravel ~ 0% Sand ~ 13.4% Silt ~ 73.5% Clay ~ 13.1%		SS 17	100	3 6 5 9	NP							
460			35	SS 18	100	2 1 3 6	NP							
		Grades to wet.		ST 19	50		NP					11		
		Brown and gray SILTY SAND, dry to moist, very dense, poorly graded, (GLACIAL OUTWASH/SM)		SS 20	85	16 20 35 25	NP							
455		Gravel ~ 4.0% Sand ~ 79.1% Silt ~ 10.9% Clay ~ 6.1%	40	End of Borehole at 40.0 feet.										





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BORING NUMBER B-24

PAGE 1 OF 2

CLIENT <u>Dynergy - Hennepin Power Station</u>	PROJECT NAME <u>Dry Ash Landfill Feasibility Study</u>
PROJECT NUMBER <u>082-255</u>	PROJECT LOCATION <u>Hennepin, Illinois</u>
DATE STARTED <u>3/20/09</u> COMPLETED <u>3/20/09</u>	GROUND ELEVATION <u>494.9 ft</u> BACKFILL <u>Cement Grout</u>
DRILLING CONTRACTOR <u>Groff Testing</u>	GROUND WATER LEVELS:
DRILLING METHOD <u>Hollow Stem Auger</u>	WHILE DRILLING <u>Dry</u>
CEC REP <u>D. KORTH</u> CHECKED BY <u>MDJ</u>	AT END OF DRILLING <u>---</u>
NOTES _____	AFTER DRILLING <u>---</u>

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS (N VALUE)	Pocket Pen. (tsf)	PID (ppm)	▲ SPT N VALUE ▲				
									PL	MC	LL		
									□ FINES CONTENT (%) □				
									20	40	60	80	
		Dark brown LEAN CLAY WITH SAND, trace fine to coarse gravel, moist, hard, (BERM FILL)	0	SS 1	70	3 4 6 12	>4.5						
		Dark yellowish brown SAND AND GRAVEL, moist, medium dense, (BERM FILL)		SS 2	55	7 6 5 4	NP						
490			5	SS 3	70	7 8 6 5	NP						
				SS 4	80	8 8 6 12	NP						
				SS 5	100	65	NP						
485		Black LEAN CLAY, trace medium to coarse sand, moist, stiff, (BERM FILL)	10	SS 6	55	6 4 4 3	1.5						
				SS 7	100	6 12 11 25	4.0						
480		Dark yellowish brown with very dark brown SILTY SAND WITH GRAVEL, moist, very dense, (ASH/SM) Gravel ~ 22.3% Sand ~ 59.4% Silt ~ 16.0% Clay ~ 2.2%	15	SS 8	80	20 25 26 20	NP						
		Yellowish brown SILTY SAND, trace fine gravel, moist, loose, (STREAM TERRACE DEPOSIT)		SS 9	80	3 4 3 3	NP						
475		Dark yellowish brown SILTY GRAVEL WITH SAND, with cobbles, moist, dense, (GLACIAL OUTWASH/GM)	20	SS 10	40	2 5 1 30	NP						

(Continued Next Page)



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BORING NUMBER B-29

PAGE 1 OF 3

CLIENT <u>Dynergy - Hennepin Power Station</u>	PROJECT NAME <u>Dry Ash Landfill Feasibility Study</u>
PROJECT NUMBER <u>082-255</u>	PROJECT LOCATION <u>Hennepin, Illinois</u>
DATE STARTED <u>3/12/09</u> COMPLETED <u>3/12/09</u>	GROUND ELEVATION <u>494.4 ft</u> BACKFILL <u>Monitoring Well</u>
DRILLING CONTRACTOR <u>Groff Testing</u>	GROUND WATER LEVELS:
DRILLING METHOD <u>Hollow Stem Auger</u>	▽ WHILE DRILLING <u>46.0 ft / Elev 448.4 ft</u>
CEC REP <u>CAC</u> CHECKED BY <u>MDJ</u>	AT END OF DRILLING <u>---</u>
NOTES _____	AFTER DRILLING <u>---</u>

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS (N VALUE)	Pocket Pen. (tsf)	PID (ppm)	▲ SPT N VALUE ▲			
									20	40	60	80
		Dark brown silty SAND, trace gravel, roots, and coal, moist, poorly graded, (ASH)	0									
		Gray SILT, with fine sand laminations, wet to moist, very loose, low to no plasticity, (ASH)		SS 1	80	2 2 4 2	NP					
490				SS 2	75	1 1 2 2	NP					
			5	SS 3	90	1 2 2 1	NP			41		
				SS 4	85	2 1 1 1	NP					
485				SS 5	90	2 3 4 4	NP					
			10	SS 6	100	2 4 2 2	NP			36		
				SS 7	85	2 1 2 5	NP					
480			15	SS 8	100	1 5 6 9	NP					
				SS 9	95	2 2 10 13	NP			25		
475		Grades to silty SAND, (ASH)		SS 10	95	2 4 2 2	NP					
			20									

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CEC CUSTOM LOG - CHICAGO WITH PID 082-255 BORING LOGS.GPJ CECTEMPLATE.GDT 5/19/09



CLIENT Dynegy - Hennepin Power Station

PROJECT NAME Dry Ash Landfill Feasibility Study

PROJECT NUMBER 082-255

PROJECT LOCATION Hennepin, Illinois

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS (N VALUE)	Pocket Pen. (tsf)	PID (ppm)	▲ SPT N VALUE ▲				
									20	40	60	80	
									PL	MC	LL		
									20	40	60	80	
									□ FINES CONTENT (%) □				
									20	40	60	80	
		Grades to silty SAND, (ASH) (continued)	20										
				SS 11	85	2 2 2 2	NP						
				SS 12	95	2 2 1 4	NP					38	
470		Dark gray to black coarse SAND, some silt, trace fine gravel and coal, dry to moist, medium dense, non plastic, (ASH)	25	SS 13	90	6 10 10 7	NP						
		Gray SILT, some sand lenses, moist to wet, loose to medium dense, (ASH)		SS 14	100	2 3 6 14	NP						
		Dark brown-dark gray silty SANDY SILT, trace coal pieces, dry to moist, medium dense, poorly graded, (ASH/ML) Gravel ~ 2.9% Sand ~ 39.7% Silt ~ 61.9% Clay ~ 5.5%		SS 15	100	5 8 14 10	NP						47
465		Grades moist to wet.	30	SS 16	100	8 8 7 3	NP						
		Gray SILT, with fine sand laminations, moist to wet, loose, (ASH)		SS 17	95	4 2 5 4	NP						
460		Grades to very dense	35	SS 18	75	3 3 2 5	NP						57
				SS 19	100	12 13 10 22	NP						
				SS 20	100	18 13 10 8	NP						
455		Wet between 40.0 to 40.25 feet.	40	SS 21	100	13 13 25 30	NP						52
		Dark brown to black silty CLAY, trace sand, trace roots, moist, stiff, (LOESS DEPOSIT)				1							

(Continued Next Page)

CEC CUSTOM LOG - CHICAGO WITH PID 082-255 BORING LOGS.GPJ CECTEMPLATE.GDT 5/19/09



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BORING NUMBER B-29

PAGE 3 OF 3

CLIENT Dynegy - Hennepin Power Station

PROJECT NAME Dry Ash Landfill Feasibility Study

PROJECT NUMBER 082-255

PROJECT LOCATION Hennepin, Illinois

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS (N VALUE)	Pocket Pen. (tsf)	PID (ppm)	▲ SPT N VALUE ▲	
									20	40
450		Dark brown to black silty CLAY, trace sand, trace roots, moist, stiff, (LOESS DEPOSIT) <i>(continued)</i>	45	SS 22	90	1 3 6	2.5		▲ SPT N VALUE ▲	
		Dark brown to black sandy CLAY, trace silt, moist, stiff, (STREAM TERRACE DEPOSIT)		SS 23	85	3 3 4			20	40
		Dark brown coarse SAND, trace gravel, wet, loose to medium stiff, poorly graded, (STREAM TERRACE DEPOSIT)		SS 24	90	2 2 2 4	1.0		▲ SPT N VALUE ▲	
445		Gray-black-brown clayey GRAVEL, some sand, wet, loose, poorly graded, (GLACIAL OUTWASH)		SS 25	75	3 4 5 5	NP		▲ SPT N VALUE ▲	
		End of Borehole at 50.0 feet.	50						▲ SPT N VALUE ▲	

CEC CUSTOM LOG - CHICAGO WITH PID 082-255 BORING LOGS.GPJ CECTEMPLATE.GDT 5/19/09



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BORING NUMBER B-33

PAGE 1 OF 3

CLIENT <u>Dynergy - Hennepin Power Station</u>	PROJECT NAME <u>Dry Ash Landfill Feasibility Study</u>
PROJECT NUMBER <u>082-255</u>	PROJECT LOCATION <u>Hennepin, Illinois</u>
DATE STARTED <u>3/2/09</u> COMPLETED <u>3/2/09</u>	GROUND ELEVATION <u>493.1 ft</u> BACKFILL <u>Bentonite Chips</u>
DRILLING CONTRACTOR <u>Groff Testing</u>	GROUND WATER LEVELS:
DRILLING METHOD <u>Hollow Stem Auger</u>	WHILE DRILLING <u>---</u>
CEC REP <u>CAC</u> CHECKED BY <u>MDJ</u>	AT END OF DRILLING <u>---</u>
NOTES _____	AFTER DRILLING <u>---</u>

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS (N VALUE)	Pocket Pen. (tsf)	PID (ppm)	▲ SPT N VALUE ▲				
									20	40	60	80	
									PL	MC	LL		
			0						□ FINES CONTENT (%) □				
									20	40	60	80	
490		Gray SILT WITH SAND, moist to wet, loose, non plastic, (ASH/ML)		SS 1	100	4 3 3 3	NP						
		With fine sand laminations		SS 2	100	2 3 3 4	NP						
			5	SS 3	85	2 2 3 2	NP				31		
				SS 4	90	2 2 1 2	NP						
485		Gravel ~ 0.0% Sand ~ 18.7% Silt ~ 65.8% Clay ~ 15.5%		SS 5	90	3 2 2 2	NP				33		
			10	SS 6	95	2 2 2 1	NP					43	
480				SS 7	100	4 2 3 5	NP						
			15	SS 8	100	2 3 2 2	NP						
		Grades dry to moist		SS 9	100	2 2 2 4	NP						48
475				SS 10	100	2 2 2 2	NP						
			20										

(Continued Next Page)

CEC CUSTOM LOG - CHICAGO WITH PID 082-255 BORING LOGS.GPJ CECTEMPLATE.GDT 5/19/09



CLIENT Dynegy - Hennepin Power Station

PROJECT NAME Dry Ash Landfill Feasibility Study

PROJECT NUMBER 082-255

PROJECT LOCATION Hennepin, Illinois

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS (N VALUE)	Pocket Pen. (tsf)	PID (ppm)	▲ SPT N VALUE ▲					
									20	40	60	80		
									PL	MC	LL			
									□ FINES CONTENT (%) □					
									20	40	60	80		
		Gray SILT WITH SAND, moist to wet, loose, non plastic, (ASH/ML) (continued)	20	SS 11	100	2 1 3 6	NP							
		Dark gray SILT, trace sand, dry to moist, loose, (ASH)		SS 12	95	5 2 2 3	NP						33	
470				SS 13	100	3 2 2 2	NP							
		Grades moist to wet	25	SS 14	100	5 4 2 2	NP							
465				SS 15	100	3 2 2 2	NP						50	
		Gray SILT, trace sand, wet, loose, poorly graded, (ASH)	30	SS 16	100	3 11 15 15	NP							
				SS 17	100	4 5 6 10	NP						42	
460				SS 18	80	7 11 10 28	NP						38	
		Dark brown fine to medium SAND, trace fine gravel, organics, moist, dense to very dense, poorly graded, (STREAM TERRACE DEPOSIT)		SS 19	100	12 25 25 30	NP							
455				SS 20	100	35 60	NP							
		Brown and gray SAND AND GRAVEL, dry to moist, non plastic; poorly graded, (GLACIAL OUTWASH)	40	SS 21	100	20 20 30	NP						7	

CEC CUSTOM LOG - CHICAGO WITH PID 082-255 BORING LOGS.GPJ CECTEMPLATE.GDT 5/19/09

(Continued Next Page)



Civil & Environmental Consultants, Inc.
 3041 Woodcreek Dr. Suite 210
 Downers Grove, IL 60510

BORING NUMBER B-33

PAGE 3 OF 3

CLIENT Dynegy - Hennepin Power Station

PROJECT NAME Dry Ash Landfill Feasibility Study

PROJECT NUMBER 082-255

PROJECT LOCATION Hennepin, Illinois

ELEVATION (ft)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	SAMPLE TYPE NUMBER	RECOVERY (%)	BLOW COUNTS (N VALUE)	Pocket Pen. (tsf)	PID (ppm)	▲ SPT N VALUE ▲				
									20	40	60	80	
450		Brown and gray SAND AND GRAVEL, dry to moist, non plastic; poorly graded, (GLACIAL OUTWASH) <i>(continued)</i>		SS 22	100	25 75	NP						
		End of Borehole at 44.0 feet.											

**APPENDIX B
GEOTECHNICAL LABORATORY REPORT**



Via email: akreinberg@geosyntec.com

March 29, 2021

Ms. Allison Kreinberg
Geosyntec Consultants, Inc.
941 Chatham Lane Suite 103
Columbus, Ohio 43221

Re: Laboratory Testing Services
Vistra Energy
Hennepin, Illinois
Geotechnology Project No. J037936.01

Dear Ms. Kreinberg:

Provided herein are the laboratory test results for the referenced project. Our services were performed in accordance with ASTM procedures.

This report has been prepared for the exclusive use of Geosyntec Consultants, Inc. Our scope of services was limited to performing specific tests on the provided samples and did not include engineering or interpretation of the test results.

Our services shall not be construed to constitute an expressed or implied warranty, including, but not limited to, any warranty for merchantability or fitness for a particular use. We do not accept responsibility for the manner in which the test results are used.

It has been our pleasure to provide laboratory testing services to you, and we would welcome the opportunity to provide other services during the course of the project. Please contact us if you need further information or clarification about this document.



* * * * *

Yours very truly,
GEOTECHNOLOGY, INC.

A handwritten signature in blue ink that reads "Erin Grimes". The signature is fluid and cursive.

Erin Grimes
Laboratory Manager

EKG/CKK:ekg

Attachments: Appendix A – Summary of Laboratory Results
Appendix B – Atterberg Limits Results
Appendix C – Grain Size Distribution
Appendix D – Test Report

Copies submitted: PDF

APPENDIX A

Summary of Laboratory Results

Borehole	Depth	Liquid Limit	Plastic Limit	Plasticity Index	Maximum Size (mm)	%<#200 Sieve	Classification	Moisture Content (%)	Dry Unit Weight (pcf)	Qu/2 (tsf)	Specific Gravity (20°C)
MW55	15.0	32	19	13	19	48.0	SC	14.4	109.0		2.720
SB52	4.0	32	17	15	9.5	78.3	CL	21.4	95.0		2.675
SB53	2.0	29	16	13	25	51.1	CL	13.7	120.0		2.680
SB53	56.0				37.5	8.3		9.9			
SB55	50.0	21	15	6	50	16.8	GC-GM	8.2			2.823
XPW01	10.0				19	73.8		157.0			2.635
XPW01	12.0				19	14.1		42.3	71.0		2.859
XPW01	15.0				9.5	6.8		31.0	79.0		2.622
XPW02	14.0	NP	NP	NP	0.84	79.2	ML	123.3	36.0		2.615
XPW02	16.0	NP	NP	NP	9.5	77.4	ML	113.2			2.622
XPW03	14.0	NP	NP	NP	2	86.3	ML	177.0	28.0		2.595
XPW03	18.0	NP	NP	NP	2	81.4	ML	138.8	34.0		2.585

US LAB SUMMARY J037936.01 - VISTRA HENNEPIN.GPJ 00 CLONE ME.GPJ 3/29/21



Summary of Laboratory Results

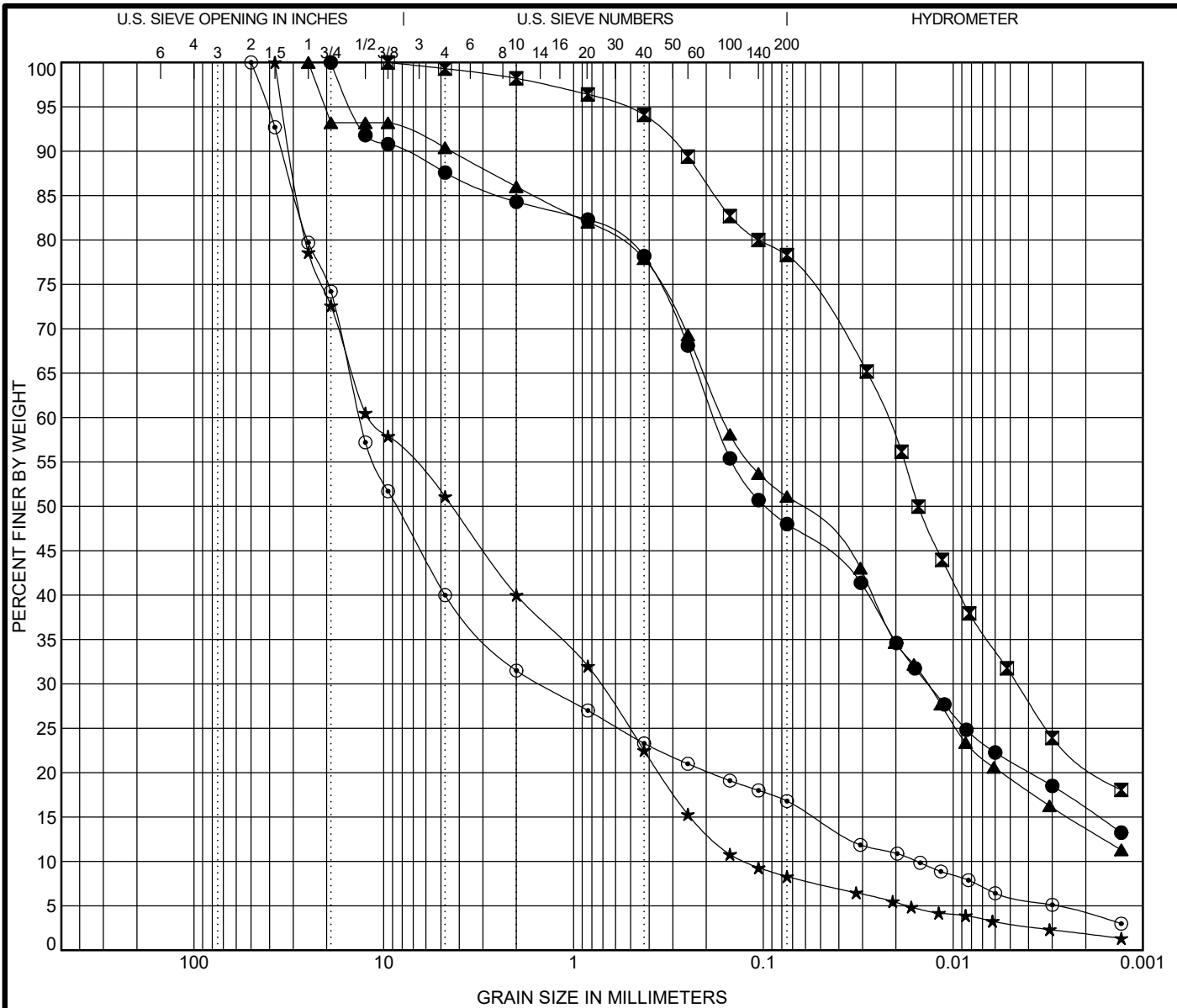
Vistra Energy
 Hennepin, Illinois
 J037936.01

APPENDIX B

Atterberg Limits Results

APPENDIX C


Grain Size Distribution



COBBLES	GRAVEL		SAND			SILT OR CLAY
	coarse	fine	coarse	medium	fine	

Boring	Depth (ft.)	Sample Description	LL	PL	PI	Cc	Cu
● MW55	15.0	CLAYEY SAND(SC)	32	19	13		
☒ SB52	4.0	LEAN CLAY with SAND(CL)	32	17	15		
▲ SB53	2.0	SANDY LEAN CLAY(CL)	29	16	13		
★ SB53	56.0					0.36	95.13
⊙ SB55	50.0	SILTY, CLAYEY GRAVEL with SAND(GC-GM)	21	15	6	10.79	862.67

Boring	Depth (ft.)	D100	D60	D30	D10	%Gravel	%Sand	%Silt	%Clay
● MW55	15.0	19	0.18	0.01		12.4	39.6	26.7	21.3
☒ SB52	4.0	9.5	0.02	0		0.7	21.0	47.1	31.2
▲ SB53	2.0	25	0.16	0.01		9.6	39.3	31.8	19.3
★ SB53	56.0	37.5	11.86	0.73	0.125	48.9	42.8	5.3	3.0
⊙ SB55	50.0	50	13.39	1.5	0.016	60.0	23.2	10.7	6.1

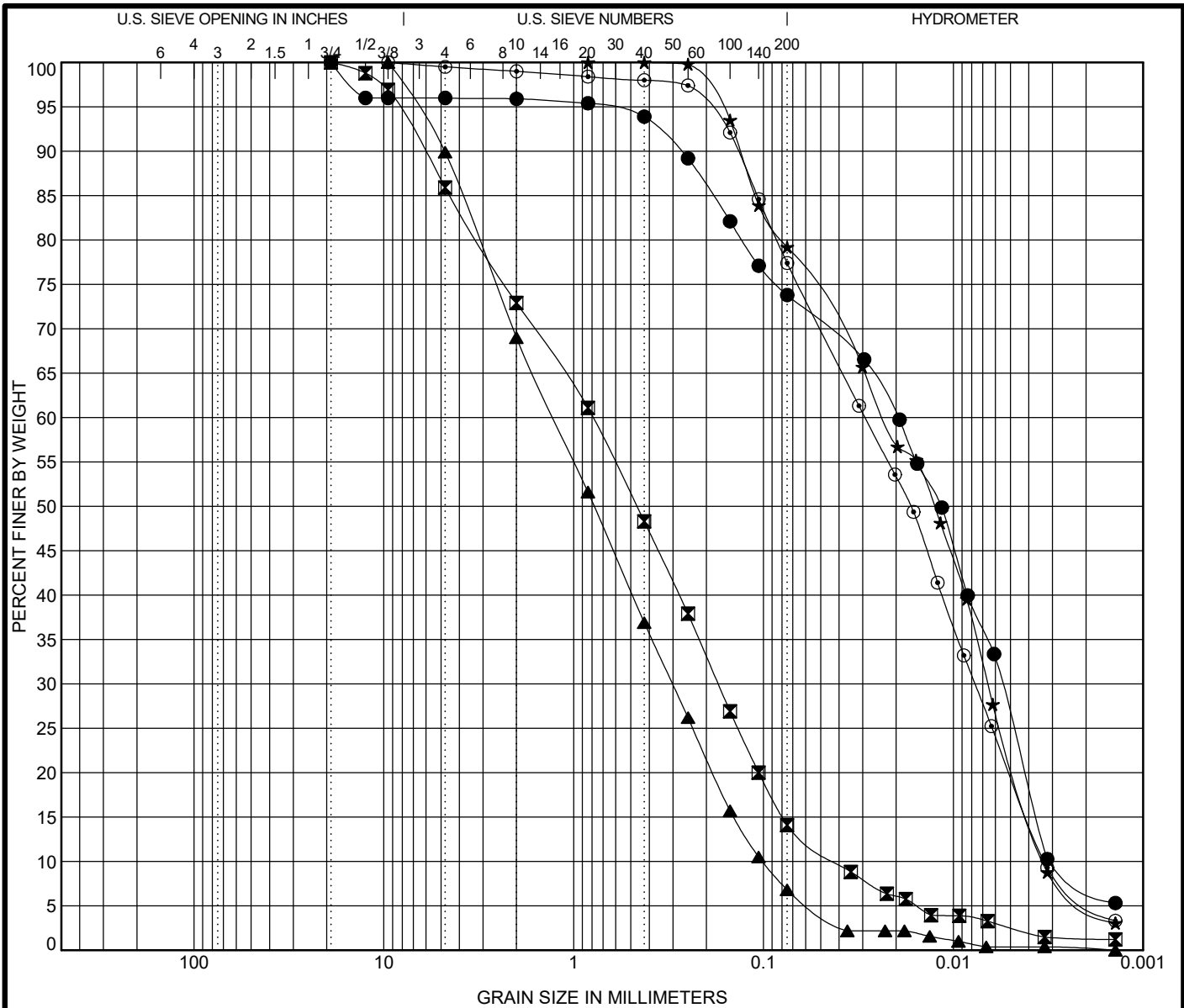


GEOTECHNOLOGY INC
FROM THE GROUND UP

GRAIN SIZE DISTRIBUTION

Vistra Energy
Hennepin, Illinois
J037936.01

GRAIN SIZE 2018 - J037936.01 - VISTRA HENNEPIN.GPJ - 00 CLONE ME.GPJ 3/26/21



COBBLES	GRAVEL		SAND			SILT OR CLAY
	coarse	fine	coarse	medium	fine	

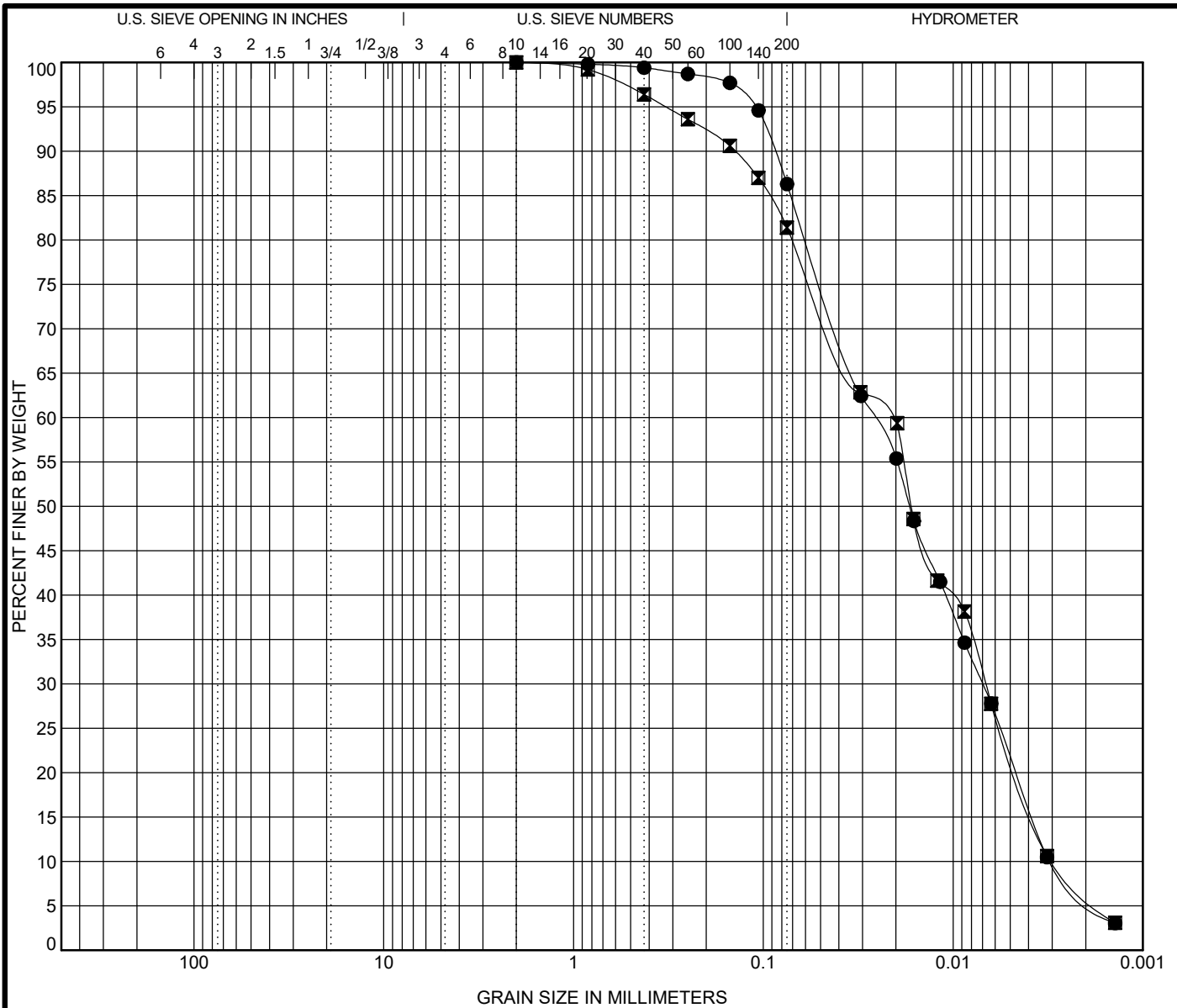
Boring	Depth (ft.)	Sample Description					LL	PL	PI	Cc	Cu	
●	XPW01	10.0									0.52	6.37
☒	XPW01	12.0									0.92	19.28
▲	XPW01	15.0									0.71	12.62
★	XPW02	14.0	SILT with SAND(ML)					NP	NP	NP	0.57	6.89
◎	XPW02	16.0	SILT with SAND(ML)					NP	NP	NP	0.62	8.84
Boring	Depth (ft.)	D100	D60	D30	D10	%Gravel	%Sand	%Silt	%Clay			
●	XPW01	10.0	19	0.02	0.01	0.003	4.0	22.2	47.6	26.2		
☒	XPW01	12.0	19	0.79	0.17	0.041	14.1	71.8	11.5	2.6		
▲	XPW01	15.0	9.5	1.28	0.3	0.101	10.1	83.1	6.4	0.4		
★	XPW02	14.0	0.84	0.02	0.01	0.003	0.0	20.8	57.7	21.5		
◎	XPW02	16.0	9.5	0.03	0.01	0.003	0.5	22.1	57.6	19.8		



GRAIN SIZE DISTRIBUTION

Vistra Energy
Hennepin, Illinois
J037936.01

GRAIN SIZE 2018 - J037936.01 - VISTRA HENNEPIN.GPJ 00 CLONE ME.GPJ 3/26/21



COBBLES	GRAVEL		SAND			SILT OR CLAY
	coarse	fine	coarse	medium	fine	

Boring	Depth (ft.)	Sample Description	LL	PL	PI	Cc	Cu
● XPW03	14.0	SILT(ML)	NP	NP	NP	0.61	8.69
■ XPW03	18.0	SILT with SAND(ML)	NP	NP	NP	0.71	7.14

Boring	Depth (ft.)	D100	D60	D30	D10	%Gravel	%Sand	%Silt	%Clay
● XPW03	14.0	2	0.03	0.01	0.003	0.0	13.7	64.4	21.9
■ XPW03	18.0	2	0.02	0.01	0.003	0.0	18.6	59.5	21.9



GRAIN SIZE DISTRIBUTION

Vistra Energy
Hennepin, Illinois
J037936.01

GRAIN SIZE 2018 - J037936.01 - VISTRA HENNEPIN.GPJ_00 CLONE ME.GPJ_3/26/21

APPENDIX D

Test Report

TEST REPORT

Prepared For:
Geosyntec Consultants, Inc.
941 Chatham Lane Suite 103
Columbus, Ohio 43221

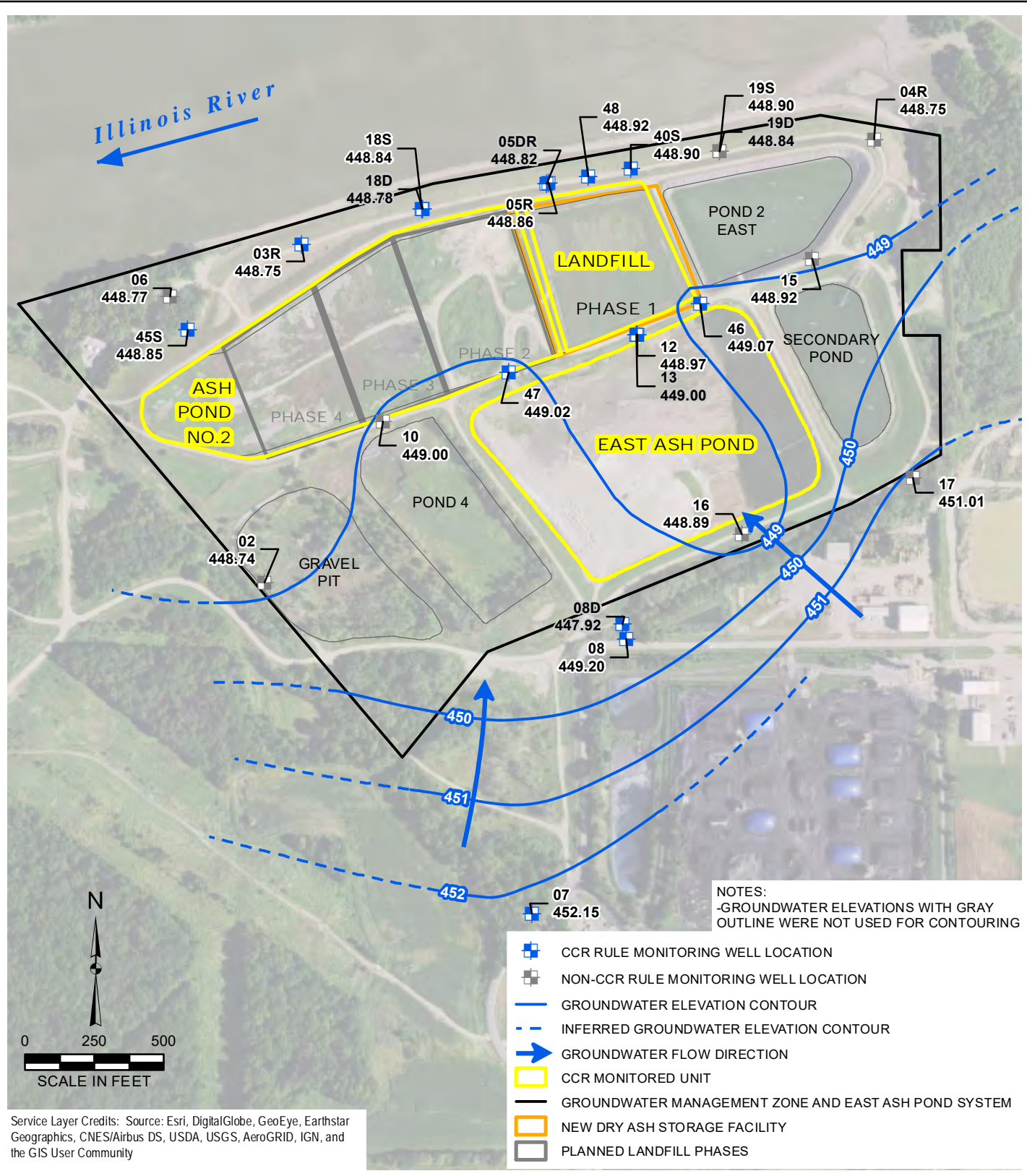
Project No.:	J037936.01	March 29, 2021
Project Name:	Vistra Energy - Hennepin	Page 1 of 1
Sampled By:	Geotechnology, Inc.	
Attention:	Ms. Allison Kreinberg	

HYDRAULIC CONDUCTIVITY (PERMEABILITY) TEST & DENSITY DETERMINATION (UNIT WEIGHT) ASTM D5084 & D7263

<u>Sample ID</u>	<u>Moisture Content (%)</u>	<u>Initial Wet Density (pcf)</u>	<u>Initial Dry Density (pcf)</u>	<u>Hydraulic Conductivity (cm/s)</u>
MW55-(15-17.5)	14.4	124.5	108.8	1.5×10^{-7}
SB52-(6-8)	24.8	118.8	95.2	7.1×10^{-8}
SB53-(2-4)	13.6	136.4	120.1	2.4×10^{-8}
XPW02-(14-16)	123.3	79.9	35.8	2.9×10^{-4}
XPW03-(14-16)	177.0	76.9	27.8	1.7×10^{-4}
XPW03-(18-20)	138.8	80.4	33.7	2.0×10^{-4}

**APPENDIX C
GROUNDWATER CONTOUR MAPS AND ELEVATIONS**

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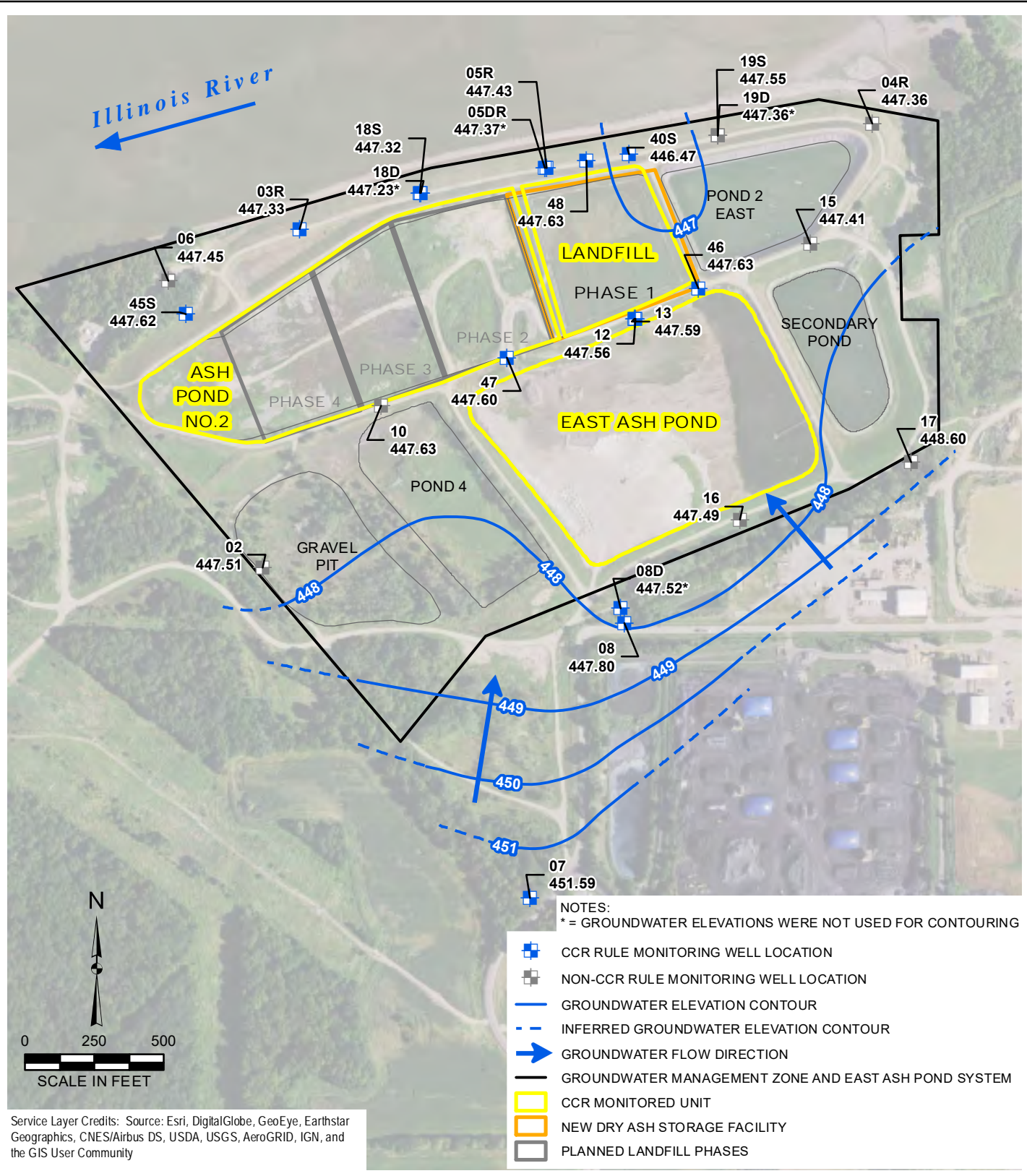
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UPPERMOST AQUIFER UNIT
GROUNDWATER ELEVATION CONTOUR MAP
ROUND 1: DECEMBER 8, 2015

 DYNEGY CCR RULE GROUNDWATER MONITORING
 HENNEPIN POWER STATION
 HENNEPIN, ILLINOIS

DRAWN BY/DATE:
 SDS 1/25/17
 REVIEWED BY/DATE:
 TBN 1/26/17
 APPROVED BY/DATE:
 JJW 2/9/17

PROJECT NO: 2285
 FIGURE NO: 1

 AN OBG COMPANY

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**HENNEPIN LANDFILL (UNIT ID: 801), HENNEPIN ASH POND NO. 2 (UNIT ID: 802), AND HENNEPIN EAST ASH POND (UNIT ID: 803)
 UPPERMOST AQUIFER UNIT
 GROUNDWATER ELEVATION CONTOUR MAP
 ROUND 2: MARCH 8, 2016**

DYNEGY CCR RULE GROUNDWATER MONITORING
 HENNEPIN POWER STATION
 HENNEPIN, ILLINOIS

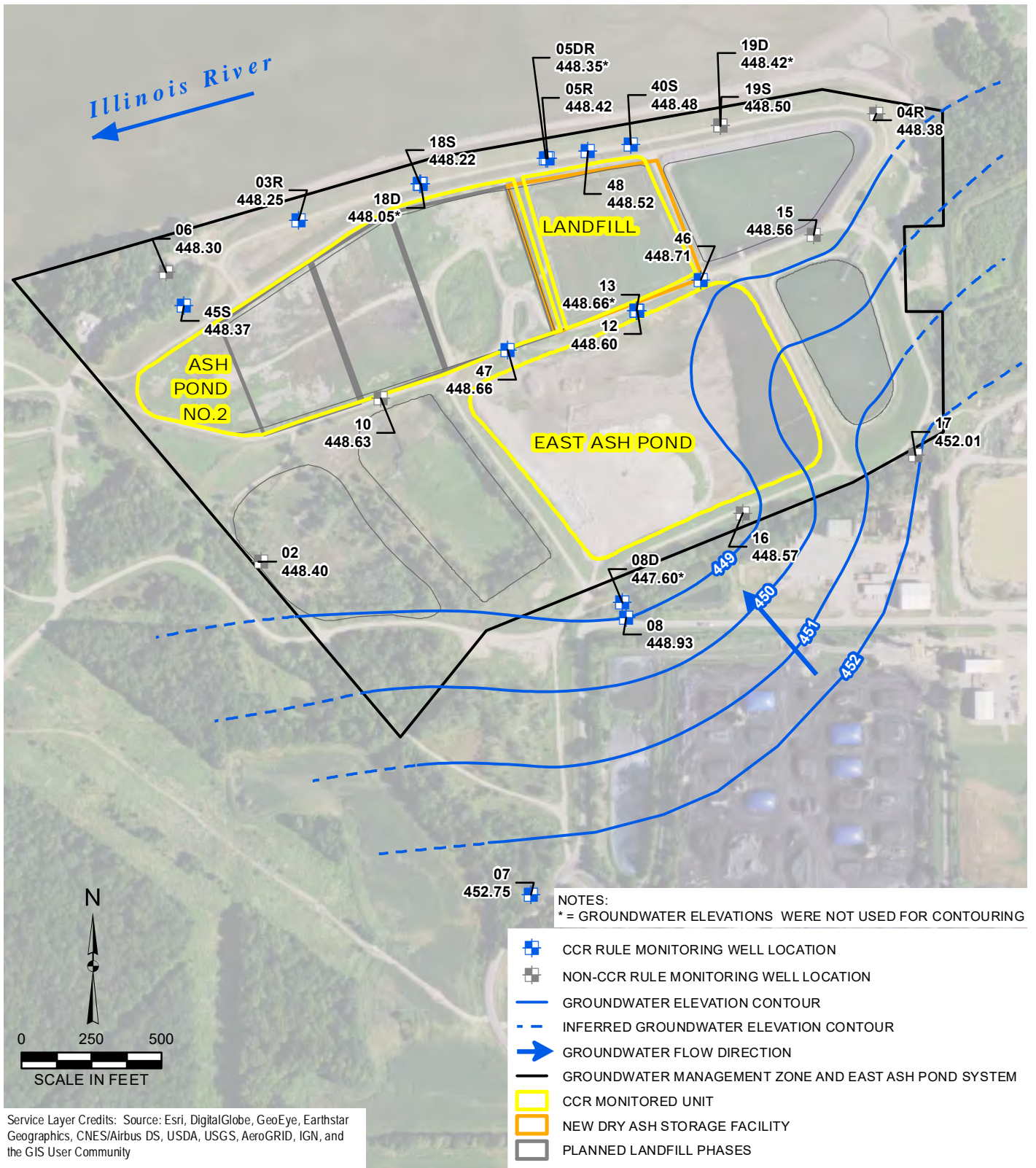
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 APPROVED BY/DATE:
 JJW 2/9/17

PROJECT NO: 2285
 FIGURE NO: 1




Natural Resource Technology
 AN OBG COMPANY

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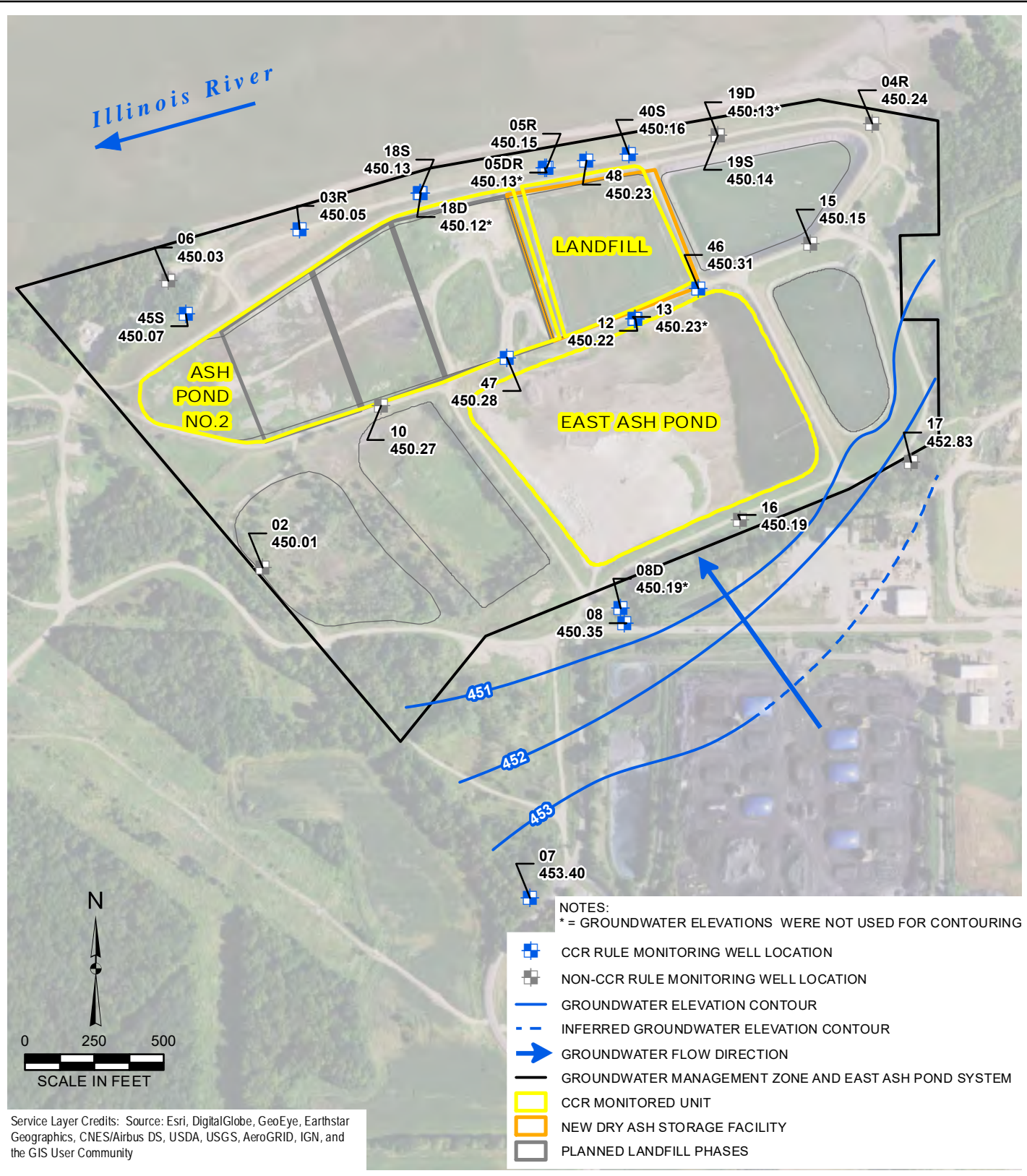


HENNEPIN LANDFILL (UNIT ID: 801), HENNEPIN ASH POND NO. 2 (UNIT ID: 802), AND HENNEPIN EAST ASH POND (UNIT ID: 803)
UPPERMOST AQUIFER UNIT
GROUNDWATER ELEVATION CONTOUR MAP
ROUND 3: JUNE 7, 2016
 DYNEGY CCR RULE GROUNDWATER MONITORING
 HENNEPIN POWER STATION
 HENNEPIN, ILLINOIS

DRAWN BY/DATE:
 SDS 1/25/17
 REVIEWED BY/DATE:
 TBN 1/26/17
 APPROVED BY/DATE:
 JJW 2/9/17

PROJECT NO: 2285
 FIGURE NO: 1

 AN OBG COMPANY

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HENNEPIN LANDFILL (UNIT ID: 801), HENNEPIN ASH POND NO. 2 (UNIT ID: 802), AND HENNEPIN EAST ASH POND (UNIT ID: 803) UPPERMOST AQUIFER UNIT

GROUNDWATER ELEVATION CONTOUR MAP

ROUND 4: SEPTEMBER 9, 2016

DYNEGY CCR RULE GROUNDWATER MONITORING
HENNEPIN POWER STATION
HENNEPIN, ILLINOIS

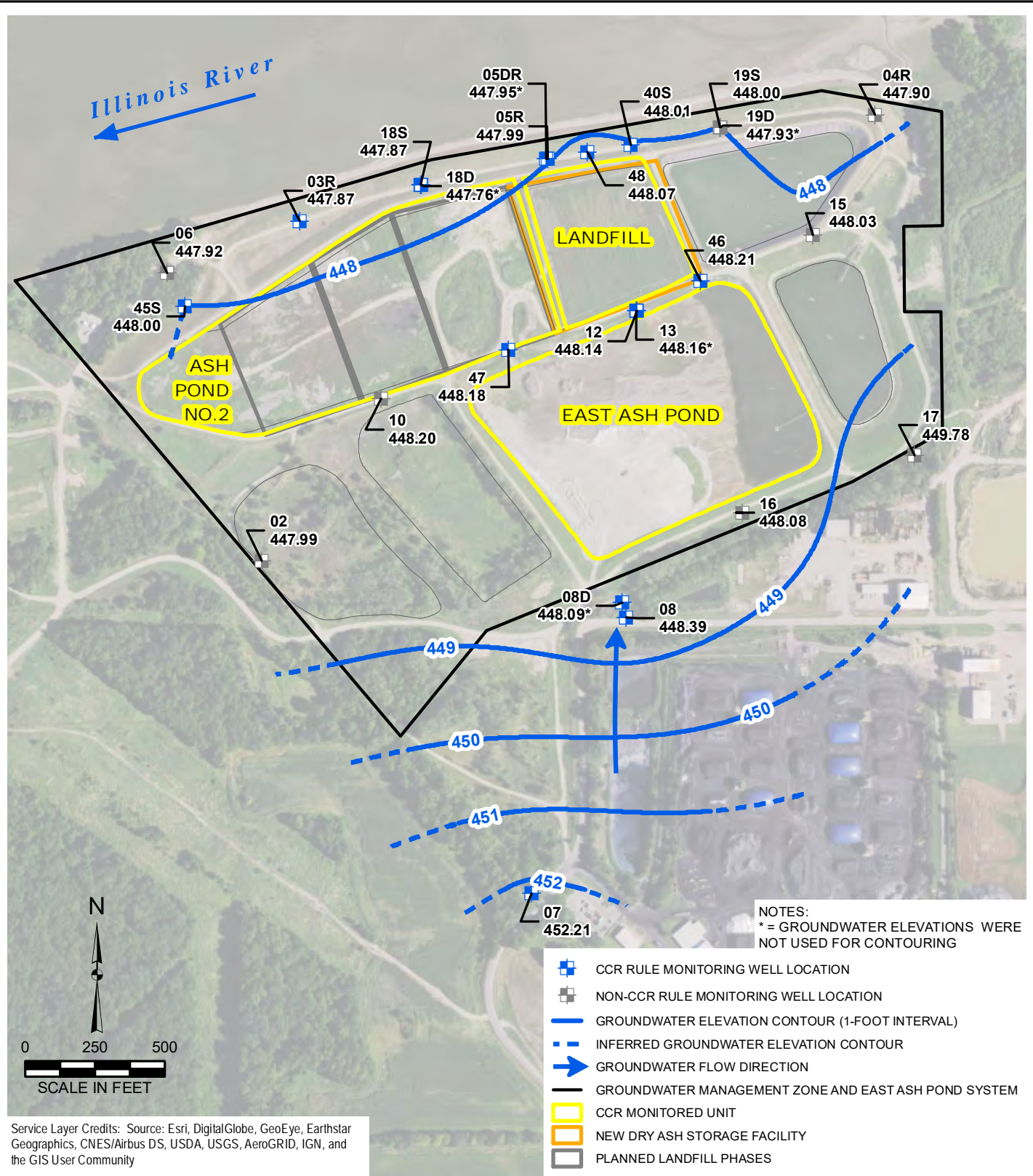
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FIGURE NO: 1

Natural Resource Technology
AN OBG COMPANY

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GROUNDWATER ELEVATION CONTOUR MAP

ROUND 5: DECEMBER 7, 2016

DYNEGY CCR RULE GROUNDWATER MONITORING

HENNEPIN POWER STATION

HENNEPIN, ILLINOIS

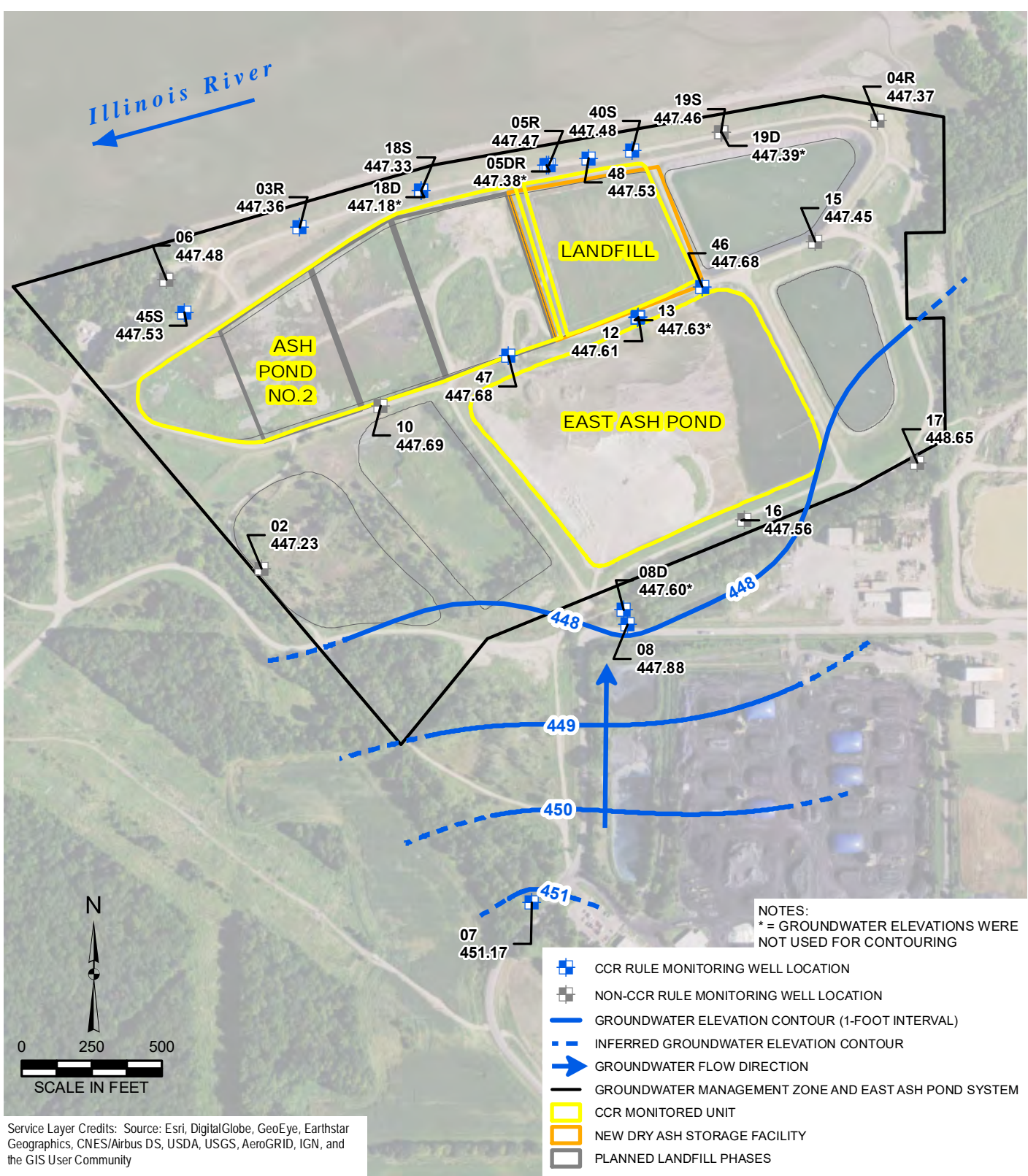
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JJW 9/1/17

PROJECT NO: 2285

FIGURE NO: 1

Natural Resource Technology
AN OBG COMPANY

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GROUNDWATER ELEVATION CONTOUR MAP

ROUND 6: FEBRUARY 20, 2017

DYNEGY CCR RULE GROUNDWATER MONITORING
HENNEPIN POWER STATION
HENNEPIN, ILLINOIS

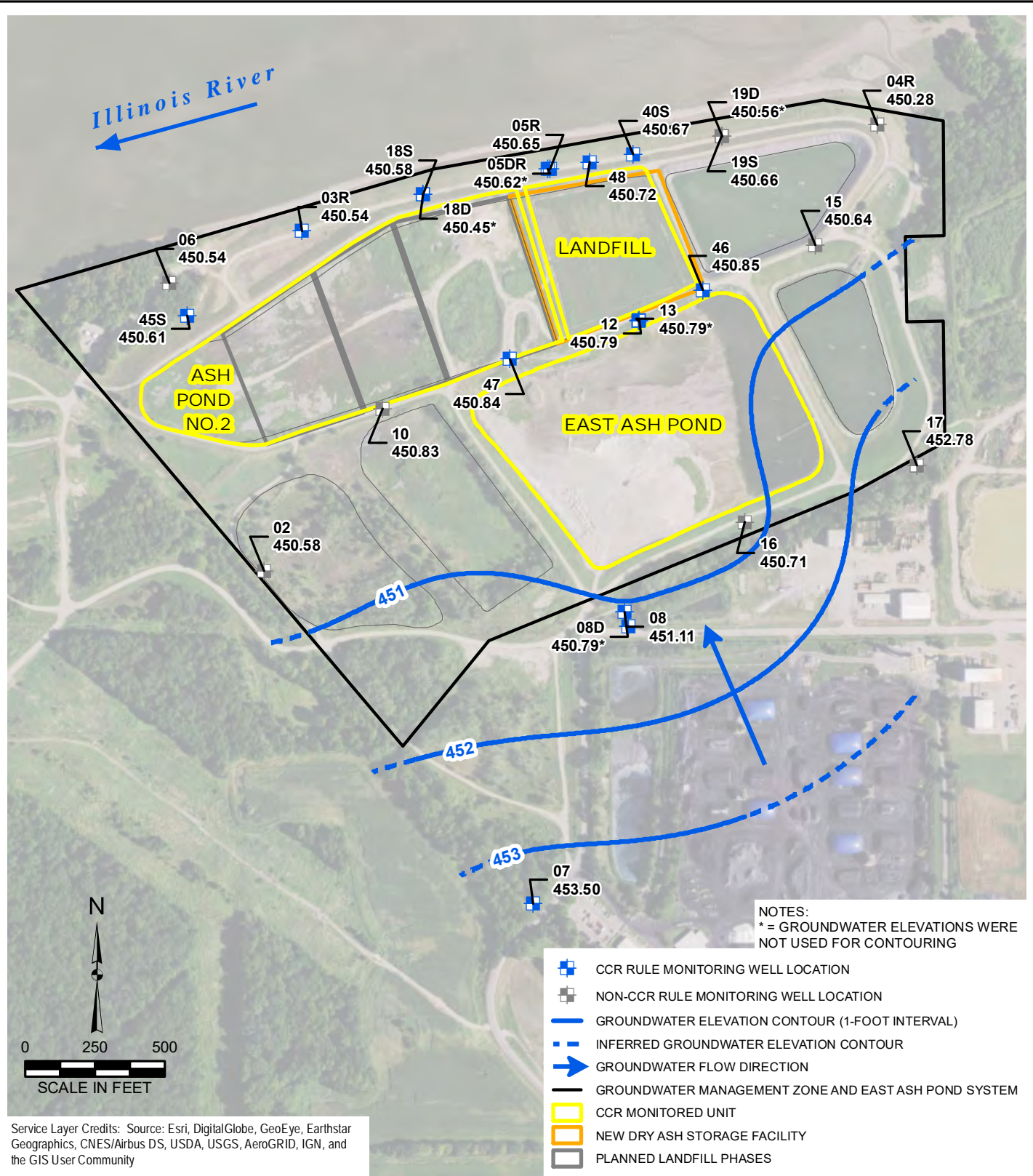
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PROJECT NO: 2285

FIGURE NO: 1



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GROUNDWATER ELEVATION CONTOUR MAP

ROUND 7: APRIL 25, 2017

DYNEGY CCR RULE GROUNDWATER MONITORING
HENNEPIN POWER STATION
HENNEPIN, ILLINOIS

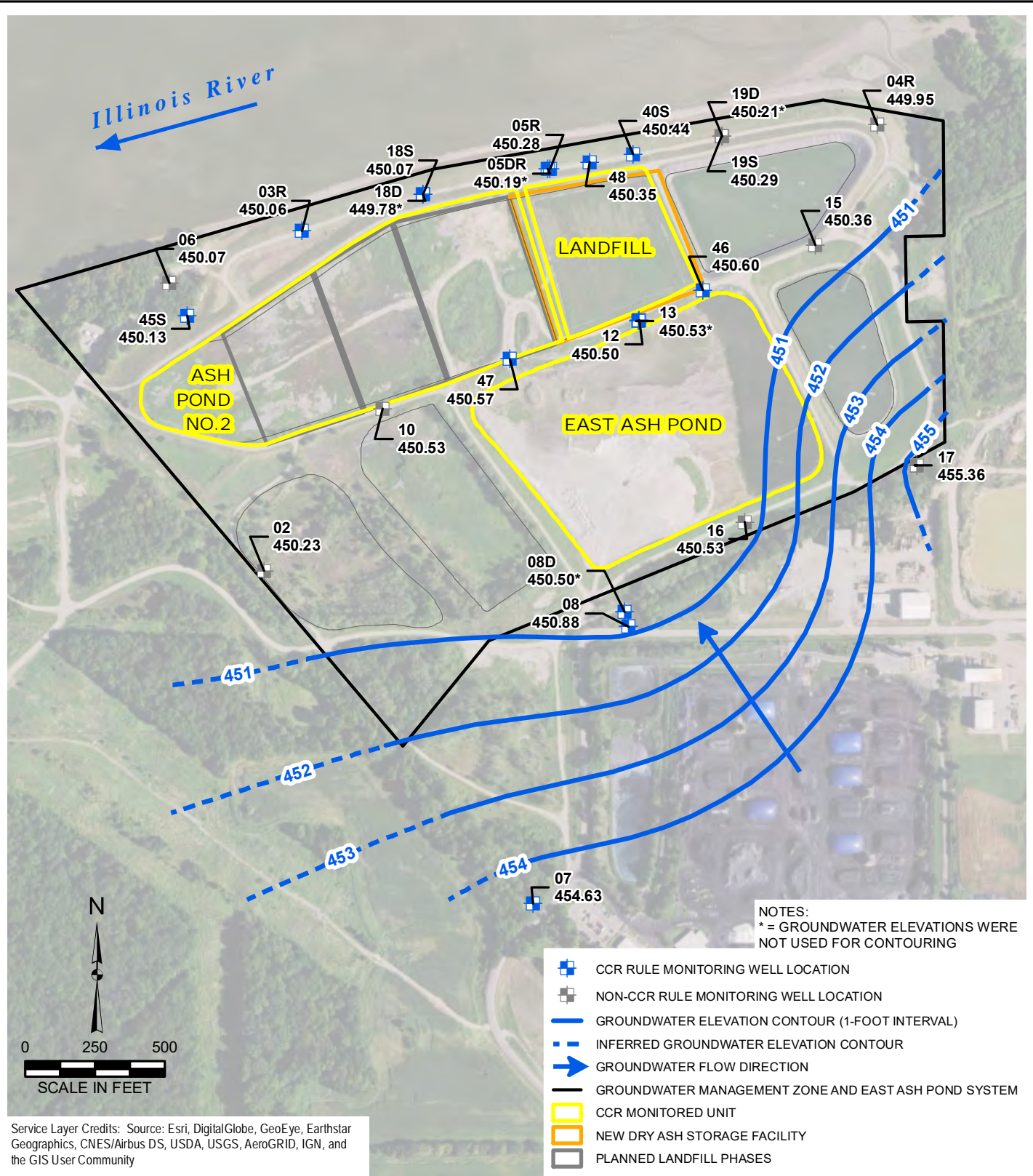
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JJW 9/1/17

PROJECT NO: 2285

FIGURE NO: 1

Natural Resource Technology
AN OBG COMPANY

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 TBN 7/20/17
 APPROVED BY/DATE:
 JJW 9/1/17

HENNEPIN LANDFILL (UNIT ID: 801), HENNEPIN ASH POND NO. 2 (UNIT ID: 802), AND HENNEPIN EAST ASH POND (UNIT ID: 803) UPPERMOST AQUIFER UNIT


GROUNDWATER ELEVATION CONTOUR MAP

ROUND 8: JUNE 8, 2017

DYNEGY CCR RULE GROUNDWATER MONITORING
 HENNEPIN POWER STATION
 HENNEPIN, ILLINOIS

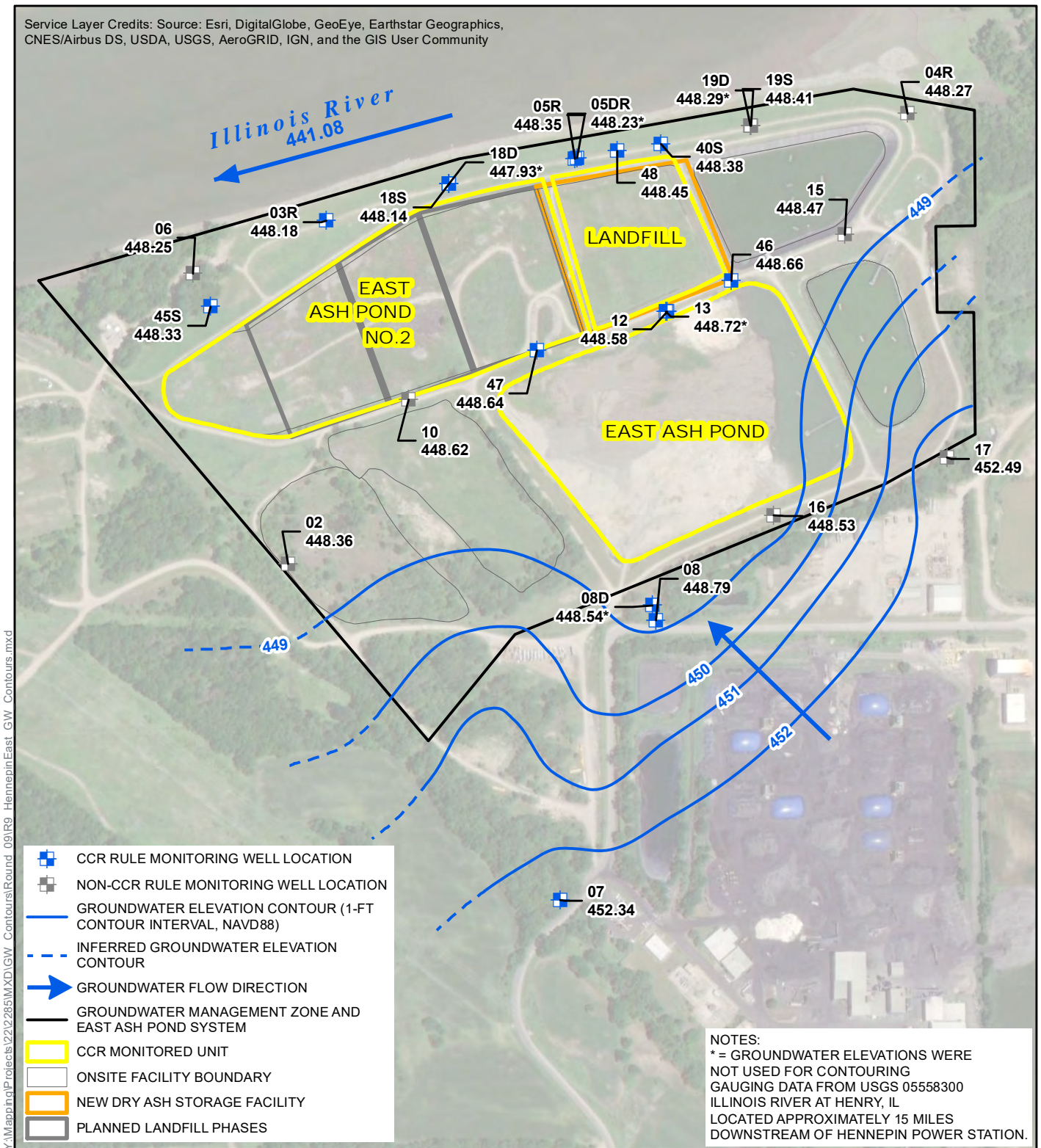
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FIGURE NO: 1



Natural Resource Technology
 AN OBG COMPANY

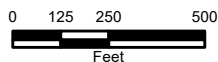
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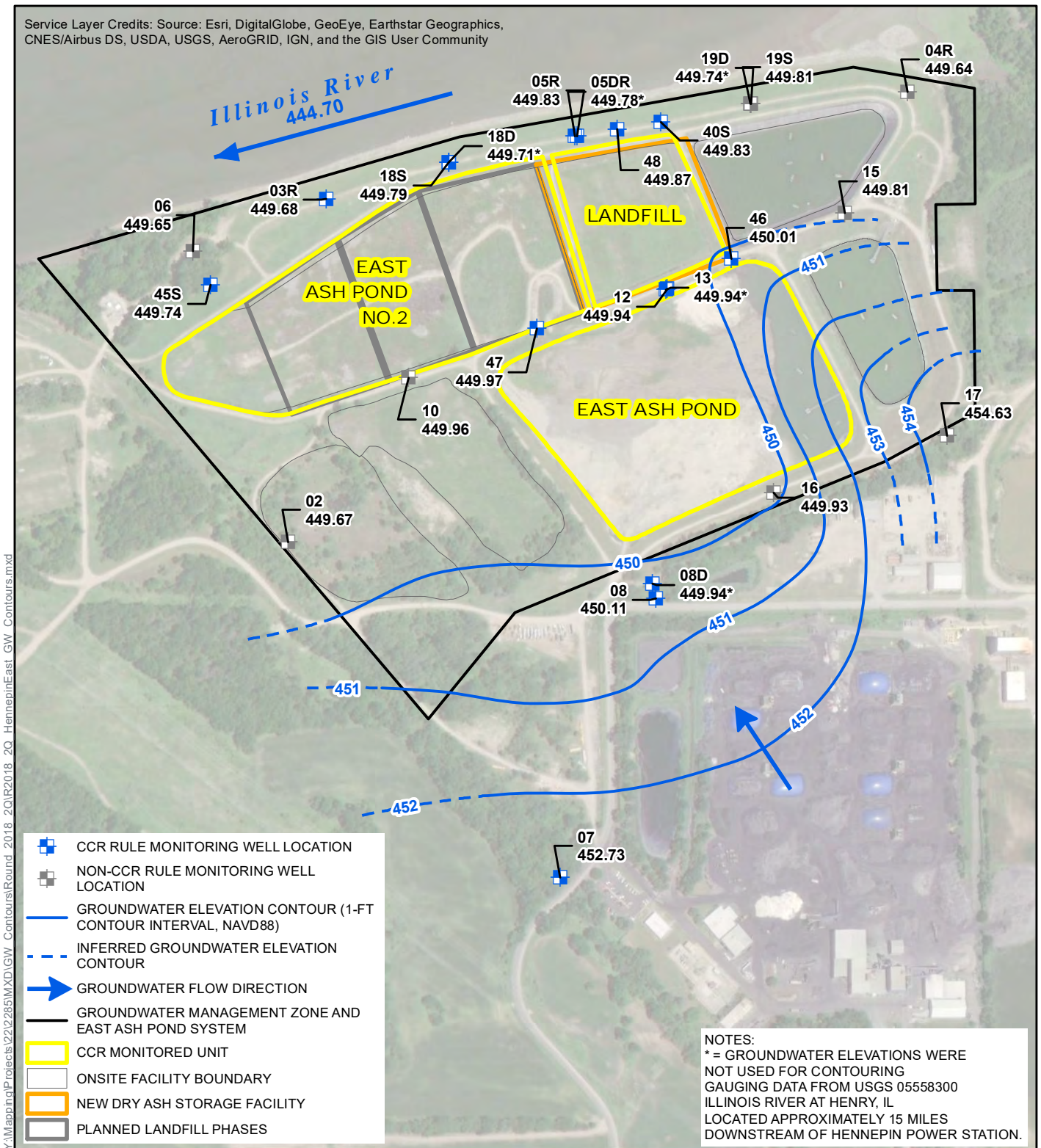
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GROUNDWATER ELEVATION CONTOUR MAP
NOVEMBER 15, 2017

CCR RULE GROUNDWATER MONITORING
HENNEPIN POWER STATION
HENNEPIN, ILLINOIS



NOTES:
* = GROUNDWATER ELEVATIONS WERE NOT USED FOR CONTOURING
GAUGING DATA FROM USGS 05558300 ILLINOIS RIVER AT HENRY, IL LOCATED APPROXIMATELY 15 MILES DOWNSTREAM OF HENNEPIN POWER STATION.

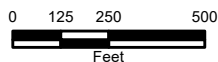
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HENNEPIN LANDFILL (UNIT ID: 801), HENNEPIN ASH POND NO. 2 (UNIT ID: 802), AND HENNEPIN EAST ASH POND (UNIT ID: 803)
 GROUNDWATER ELEVATION CONTOUR MAP
 JUNE 13, 2018

CCR RULE GROUNDWATER MONITORING
 HENNEPIN POWER STATION
 HENNEPIN, ILLINOIS

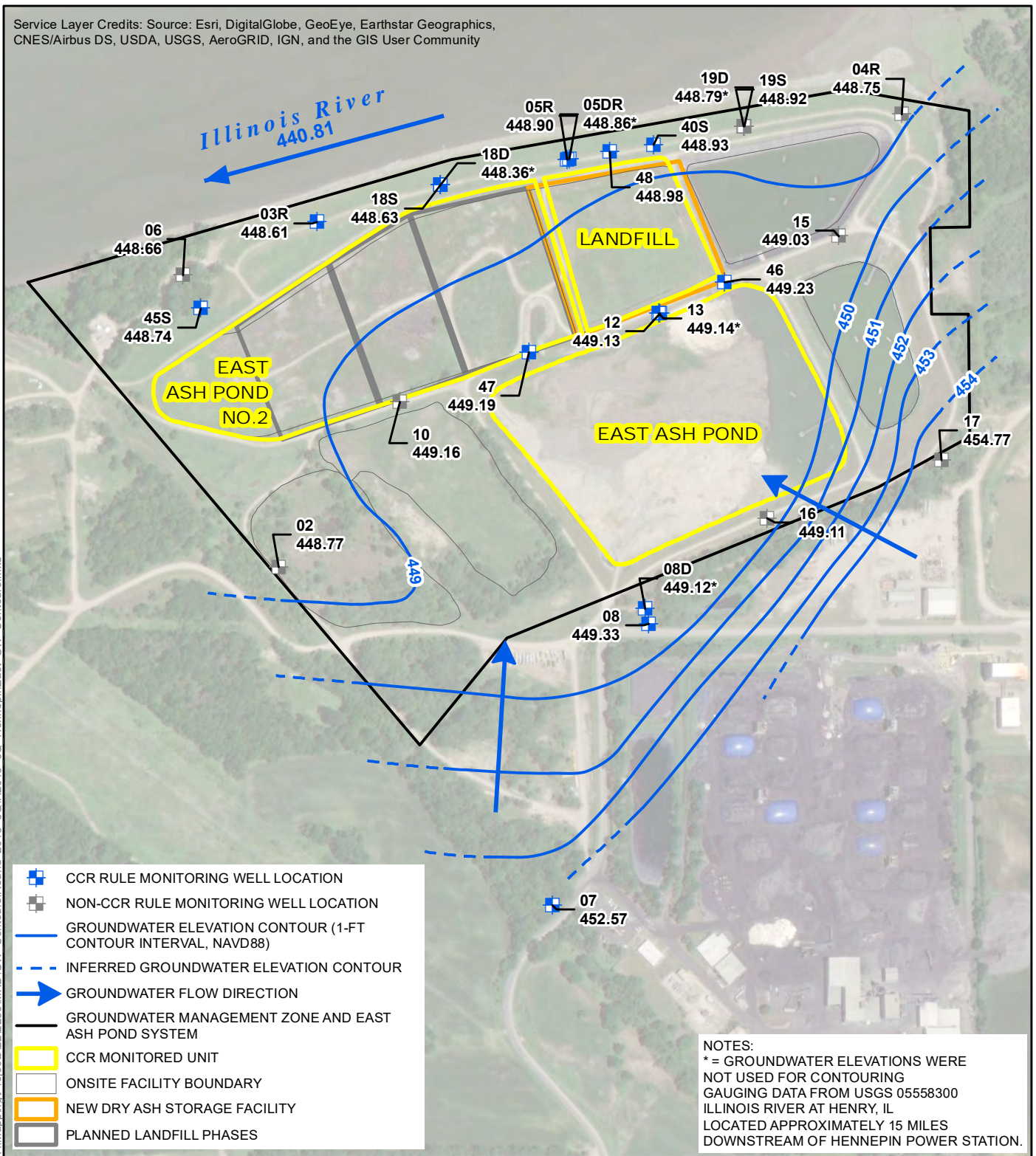


O'BRIEN & GERE ENGINEERS, INC.



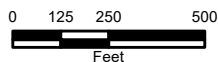
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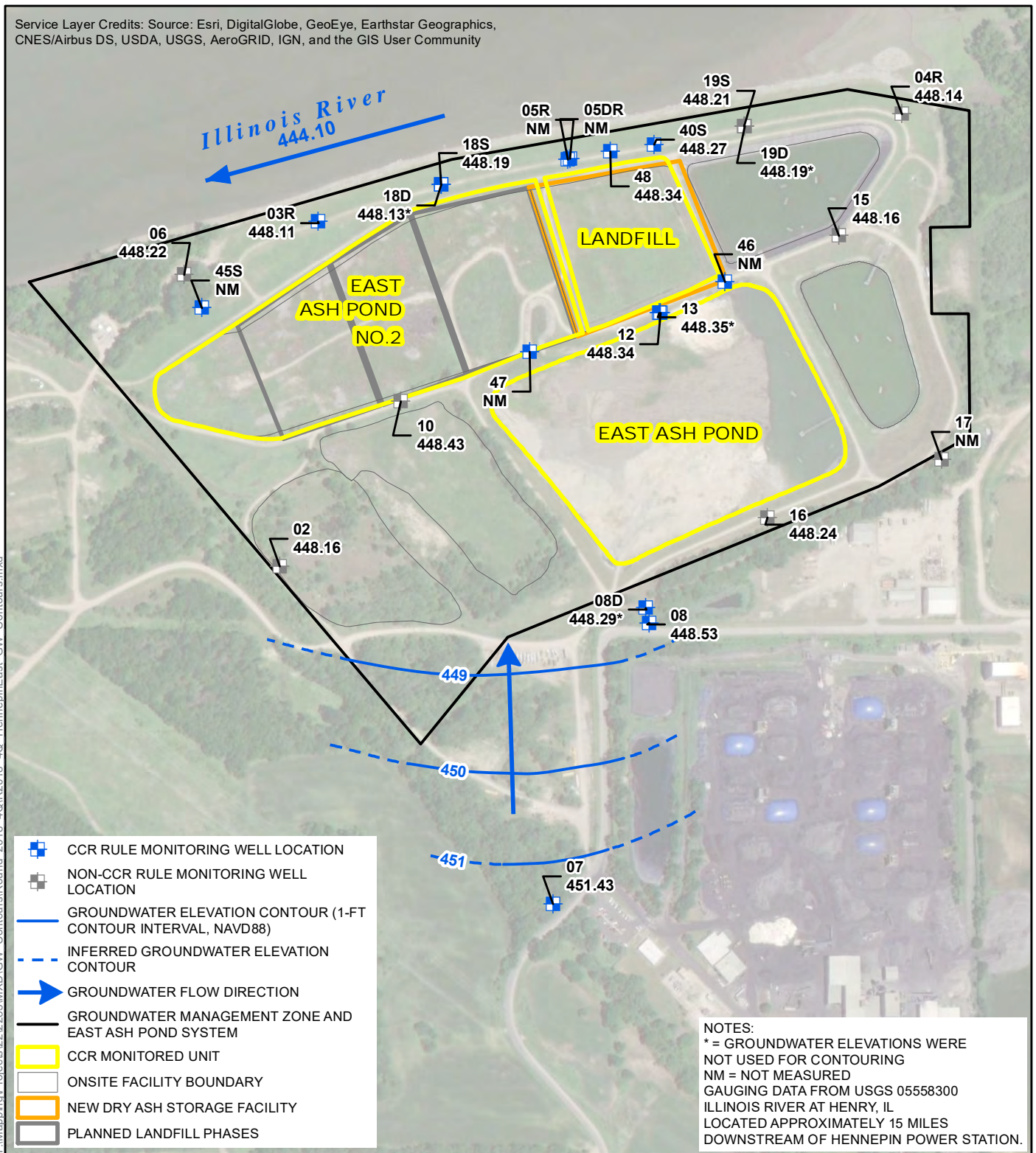
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(UNIT ID: 802), AND HENNEPIN EAST ASH POND (UNIT ID: 803)
GROUNDWATER ELEVATION CONTOUR MAP
SEPTEMBER 12, 2018**

**CCR RULE GROUNDWATER MONITORING
HENNEPIN POWER STATION
HENNEPIN, ILLINOIS**



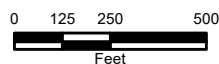
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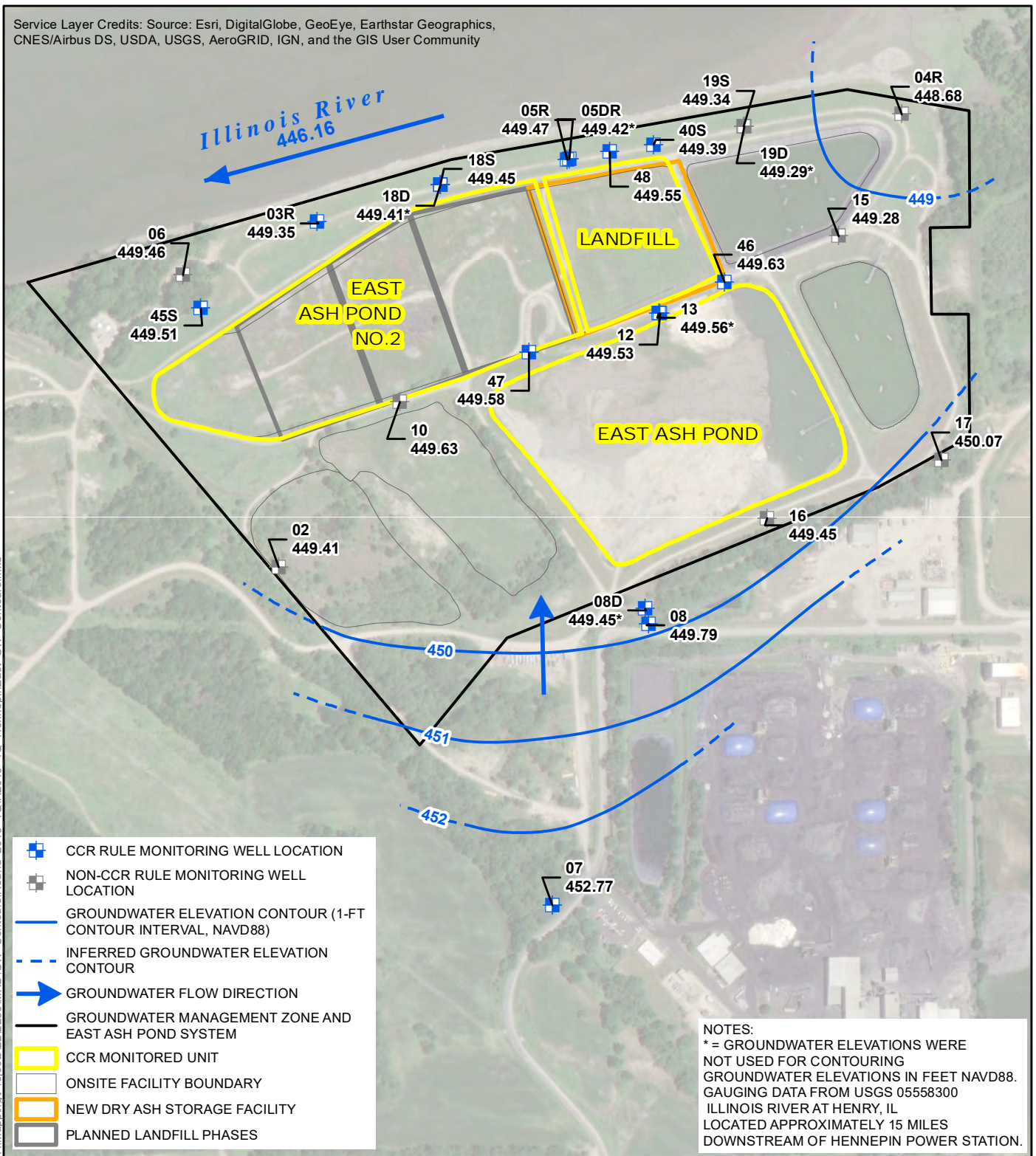
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GROUNDWATER ELEVATION CONTOUR MAP
DECEMBER 12, 2018

CCR RULE GROUNDWATER MONITORING
HENNEPIN POWER STATION
HENNEPIN, ILLINOIS



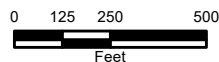
Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

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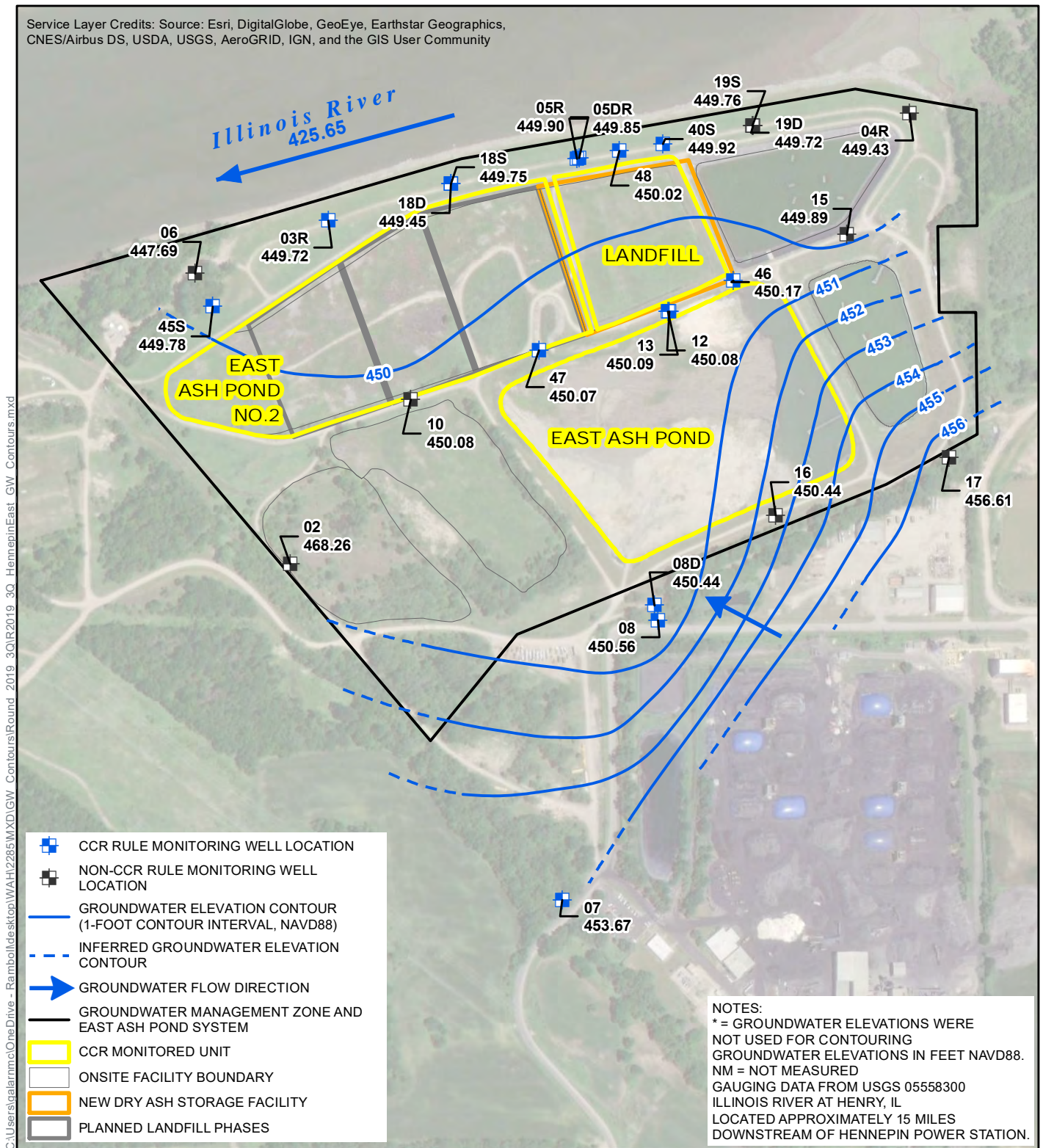


HENNEPIN LANDFILL (UNIT ID: 801), HENNEPIN ASH POND NO. 2 (UNIT ID: 802), AND HENNEPIN EAST ASH POND (UNIT ID: 803)
 GROUNDWATER ELEVATION CONTOUR MAP
 MARCH 13, 2019

CCR RULE GROUNDWATER MONITORING
 HENNEPIN POWER STATION
 HENNEPIN, ILLINOIS

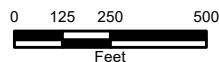


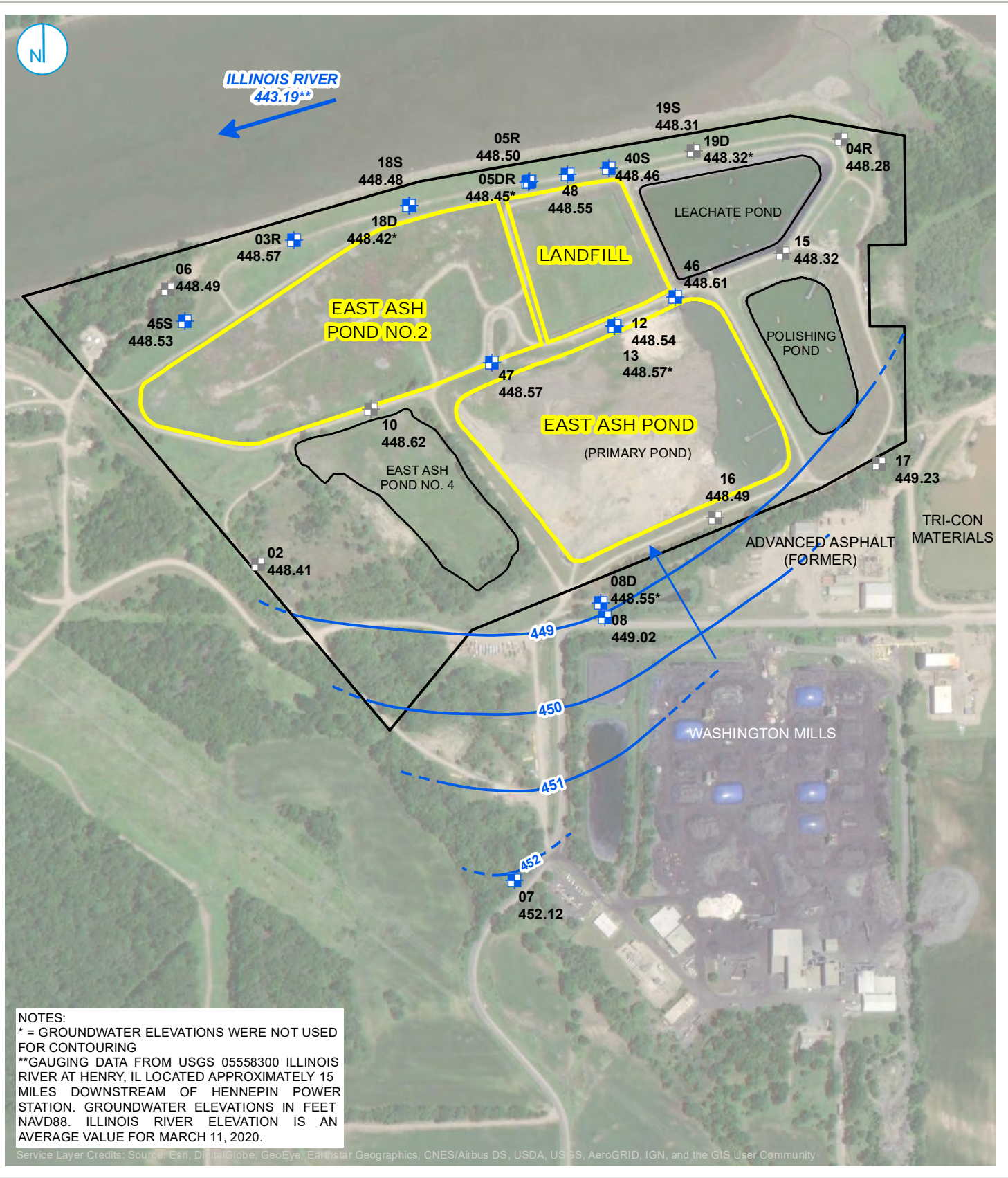
Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



HENNEPIN LANDFILL (UNIT ID: 801), HENNEPIN ASH POND NO. 2 (UNIT ID: 802), AND HENNEPIN EAST ASH POND (UNIT ID: 803)
GROUNDWATER ELEVATION CONTOUR MAP
SEPTEMBER 17, 2019

CCR RULE GROUNDWATER MONITORING
HENNEPIN POWER STATION
HENNEPIN, ILLINOIS





- CCR MONITORING WELL
 - NON-CCR MONITORING WELL
 - GROUNDWATER ELEVATION CONTOUR (1-FT CONTOUR INTERVAL, NAVD88)
 - INFERRED GROUNDWATER ELEVATION CONTOUR
 - GROUNDWATER FLOW DIRECTION
 - GROUNDWATER MANAGEMENT ZONE AND EAST ASH POND SYSTEM
 - CCR MONITORED UNIT
 - NON-CCR UNIT
- 0 250 500 Feet

**GROUNDWATER ELEVATION
CONTOUR MAP
MARCH 11, 2020**

**HENNEPIN LANDFILL (UNIT ID: 801),
HENNEPIN ASH POND NO. 2 (UNIT ID: 802), AND
HENNEPIN EAST ASH POND (UNIT ID: 803)**
VISTRA ENERGY
HENNEPIN POWER STATION
HENNEPIN, ILLINOIS

RAMBOLL US CORPORATION
A RAMBOLL COMPANY



**APPENDIX C
GROUNDWATER CONTOUR MAPS AND ELEVATIONS
TABLE C-1. GROUNDWATER ELEVATION RESULTS
(2015-2021)**

TABLE C-1. GROUNDWATER ELEVATIONS
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
02	03/19/2015	446.28
02	06/22/2015	455.43
02	09/17/2015	448.06
02	12/09/2015	448.74
02	03/08/2016	447.51
02	03/10/2016	447.51
02	06/07/2016	448.40
02	06/08/2016	448.40
02	08/31/2016	450.01
02	09/01/2016	450.01
02	12/07/2016	447.99
02	12/09/2016	447.99
02	02/20/2017	447.23
02	02/22/2017	447.23
02	04/25/2017	450.58
02	04/27/2017	450.58
02	06/08/2017	450.23
02	09/07/2017	448.69
02	11/15/2017	448.36
02	11/16/2017	448.36
02	03/27/2018	449.04
02	06/13/2018	449.67
02	09/12/2018	448.77
02	12/12/2018	448.16
02	03/13/2019	449.41
02	03/14/2019	449.41
02	06/18/2019	452.88
02	09/17/2019	468.26
02	09/18/2019	468.26
02	12/11/2019	448.61
02	12/12/2019	448.61
02	03/11/2020	448.41
02	03/12/2020	448.41
02	06/03/2020	454.04
02	06/04/2020	454.04
02	09/02/2020	449.59
02	12/09/2020	447.06
02	12/10/2020	447.06
02	02/24/2021	446.17
02	03/17/2021	447.04
02	03/18/2021	447.09
02	03/22/2021	447.23
02	04/07/2021	447.22
02	05/06/2021	448.67
02	06/08/2021	448.45

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
02	06/24/2021	448.80
02	07/13/2021	451.11
02	08/03/2021	449.07
03R	03/18/2015	446.98
03R	06/23/2015	455.64
03R	09/16/2015	447.92
03R	12/08/2015	448.75
03R	12/09/2015	448.75
03R	03/08/2016	447.33
03R	03/09/2016	447.33
03R	06/07/2016	448.25
03R	06/08/2016	448.25
03R	08/31/2016	450.05
03R	12/07/2016	447.87
03R	12/08/2016	447.87
03R	02/20/2017	447.36
03R	02/22/2017	447.36
03R	04/25/2017	450.54
03R	04/26/2017	450.54
03R	06/08/2017	450.06
03R	06/09/2017	450.06
03R	09/07/2017	448.45
03R	11/15/2017	448.18
03R	11/16/2017	448.18
03R	03/26/2018	448.97
03R	06/13/2018	449.68
03R	09/12/2018	448.61
03R	12/12/2018	448.11
03R	03/13/2019	449.35
03R	06/18/2019	452.79
03R	09/17/2019	449.72
03R	12/11/2019	448.50
03R	12/12/2019	448.50
03R	03/11/2020	448.57
03R	03/12/2020	448.42
03R	06/03/2020	454.11
03R	09/02/2020	448.90
03R	09/03/2020	448.90
03R	12/09/2020	446.94
03R	02/24/2021	446.11
03R	03/18/2021	447.08
03R	03/22/2021	447.22
03R	04/07/2021	447.30
03R	05/05/2021	448.32
03R	06/08/2021	448.23

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
03R	06/25/2021	448.87
03R	07/13/2021	450.92
03R	08/03/2021	448.79
04R	03/18/2015	450.93
04R	06/23/2015	455.70
04R	09/16/2015	448.05
04R	12/09/2015	448.75
04R	03/08/2016	447.36
04R	03/10/2016	447.36
04R	06/07/2016	448.38
04R	06/08/2016	448.38
04R	08/31/2016	450.24
04R	12/07/2016	447.90
04R	12/08/2016	447.90
04R	02/20/2017	447.37
04R	02/22/2017	447.37
04R	04/25/2017	450.28
04R	04/26/2017	450.28
04R	06/08/2017	449.95
04R	09/07/2017	448.58
04R	11/15/2017	448.27
04R	11/16/2017	448.27
04R	03/26/2018	448.84
04R	06/13/2018	449.64
04R	09/12/2018	448.75
04R	12/12/2018	448.14
04R	03/13/2019	448.68
04R	06/18/2019	452.31
04R	09/17/2019	449.43
04R	12/11/2019	448.45
04R	03/11/2020	448.28
04R	06/03/2020	453.75
04R	09/02/2020	448.92
04R	09/03/2020	448.92
04R	12/09/2020	447.04
04R	02/24/2021	446.18
04R	03/17/2021	447.02
04R	03/18/2021	447.02
04R	03/22/2021	447.21
04R	04/07/2021	447.38
04R	05/06/2021	448.66
04R	06/08/2021	448.30
04R	06/24/2021	448.89
04R	07/13/2021	450.50
04R	08/03/2021	448.89

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
05R	03/18/2015	447.02
05R	06/23/2015	455.70
05R	09/16/2015	448.13
05R	12/08/2015	448.86
05R	12/09/2015	448.86
05R	03/08/2016	447.43
05R	03/09/2016	447.43
05R	06/07/2016	448.42
05R	06/08/2016	448.42
05R	08/31/2016	450.15
05R	12/07/2016	447.99
05R	12/08/2016	447.99
05R	02/20/2017	447.47
05R	02/22/2017	447.47
05R	04/25/2017	450.65
05R	04/26/2017	450.65
05R	06/08/2017	450.28
05R	09/07/2017	448.73
05R	11/15/2017	448.35
05R	11/16/2017	448.35
05R	03/26/2018	449.09
05R	06/13/2018	449.83
05R	09/12/2018	448.90
05R	12/13/2018	448.24
05R	03/13/2019	449.47
05R	06/18/2019	452.98
05R	09/17/2019	449.90
05R	12/11/2019	448.63
05R	12/12/2019	448.63
05R	03/11/2020	448.50
05R	03/12/2020	448.50
05R	06/03/2020	454.28
05R	09/02/2020	449.13
05R	09/03/2020	449.13
05R	12/09/2020	447.08
05R	02/24/2021	446.16
05R	03/18/2021	447.13
05R	03/22/2021	447.32
05R	04/07/2021	448.02
05R	05/05/2021	448.53
05R	06/08/2021	448.48
05R	06/24/2021	449.05
05R	07/13/2021	451.16
05R	08/03/2021	449.12
05DR	03/18/2015	447.00

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
05DR	06/23/2015	455.68
05DR	09/16/2015	448.03
05DR	12/08/2015	448.82
05DR	12/09/2015	448.82
05DR	03/08/2016	447.37
05DR	03/09/2016	447.37
05DR	06/07/2016	448.35
05DR	06/08/2016	448.35
05DR	08/31/2016	450.13
05DR	12/07/2016	447.95
05DR	12/08/2016	447.95
05DR	02/20/2017	447.38
05DR	02/22/2017	447.38
05DR	04/25/2017	450.62
05DR	04/26/2017	450.62
05DR	06/08/2017	450.19
05DR	09/07/2017	448.57
05DR	11/15/2017	448.23
05DR	11/16/2017	448.23
05DR	03/26/2018	448.97
05DR	06/13/2018	449.78
05DR	09/12/2018	448.86
05DR	12/13/2018	448.16
05DR	03/13/2019	449.42
05DR	06/18/2019	452.95
05DR	09/17/2019	449.85
05DR	12/11/2019	448.47
05DR	12/12/2019	448.47
05DR	03/11/2020	448.45
05DR	03/12/2020	448.45
05DR	06/03/2020	454.32
05DR	09/02/2020	449.06
05DR	09/03/2020	449.06
05DR	12/09/2020	446.92
05DR	02/24/2021	446.13
05DR	03/18/2021	447.02
05DR	03/22/2021	447.24
05DR	04/07/2021	447.46
05DR	05/05/2021	448.42
05DR	06/08/2021	448.32
05DR	06/24/2021	448.89
05DR	07/13/2021	451.02
05DR	08/03/2021	448.98
06	03/18/2015	447.04
06	03/19/2015	446.28

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
06	06/22/2015	455.75
06	09/16/2015	448.00
06	12/09/2015	448.77
06	03/08/2016	447.45
06	03/09/2016	447.45
06	06/07/2016	448.30
06	06/08/2016	448.30
06	08/31/2016	450.03
06	12/07/2016	447.92
06	12/08/2016	447.92
06	02/20/2017	447.48
06	02/22/2017	447.48
06	04/25/2017	450.54
06	04/26/2017	450.54
06	06/08/2017	450.07
06	09/07/2017	448.50
06	11/15/2017	448.25
06	11/16/2017	448.25
06	03/26/2018	449.04
06	06/13/2018	449.65
06	09/12/2018	448.66
06	12/12/2018	448.22
06	03/13/2019	449.46
06	03/14/2019	449.46
06	06/18/2019	452.74
06	09/17/2019	447.69
06	12/11/2019	448.55
06	12/12/2019	448.55
06	03/11/2020	448.49
06	03/12/2020	448.49
06	06/03/2020	453.99
06	09/02/2020	441.55
06	09/03/2020	441.55
06	12/09/2020	447.06
06	03/17/2021	447.07
06	03/18/2021	447.07
06	06/25/2021	447.84
07	03/19/2015	449.10
07	06/23/2015	454.07
07	09/17/2015	452.72
07	12/09/2015	452.15
07	03/08/2016	451.59
07	03/10/2016	451.59
07	06/07/2016	452.75
07	06/08/2016	452.75

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
07	07/29/2016	453.12
07	08/31/2016	453.40
07	09/01/2016	453.40
07	12/07/2016	452.21
07	12/09/2016	452.21
07	02/20/2017	451.17
07	02/22/2017	451.17
07	04/25/2017	453.50
07	04/27/2017	435.50
07	06/08/2017	454.63
07	09/07/2017	453.06
07	11/15/2017	452.34
07	11/16/2017	452.34
07	03/27/2018	452.77
07	06/13/2018	452.73
07	09/12/2018	452.57
07	12/12/2018	451.43
07	03/13/2019	452.77
07	03/14/2019	452.77
07	06/18/2019	457.11
07	09/17/2019	453.67
07	09/18/2019	453.67
07	12/11/2019	452.93
07	12/12/2019	452.93
07	03/11/2020	452.12
07	03/12/2020	452.12
07	06/03/2020	457.05
07	06/04/2020	457.05
07	09/02/2020	453.37
07	09/03/2020	453.37
07	12/09/2020	451.07
07	12/10/2020	451.07
07	02/24/2021	449.54
07	03/18/2021	450.09
07	04/07/2021	450.15
07	05/05/2021	455.60
07	06/08/2021	451.55
07	06/24/2021	451.49
07	07/13/2021	452.82
07	08/03/2021	452.61
08	03/19/2015	447.18
08	06/22/2015	455.41
08	09/16/2015	448.60
08	12/08/2015	449.20
08	03/08/2016	447.80

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
08	03/10/2016	447.80
08	06/07/2016	448.93
08	08/31/2016	450.35
08	09/01/2016	450.35
08	12/07/2016	448.39
08	12/09/2016	448.39
08	02/20/2017	447.88
08	02/22/2017	447.88
08	04/25/2017	451.11
08	04/27/2017	451.11
08	06/08/2017	450.88
08	06/09/2017	450.88
08	09/07/2017	449.29
08	11/15/2017	448.79
08	11/16/2017	448.79
08	03/27/2018	449.45
08	06/13/2018	450.11
08	09/12/2018	449.33
08	12/12/2018	448.53
08	03/13/2019	449.79
08	03/14/2019	449.79
08	06/18/2019	453.61
08	09/17/2019	450.56
08	09/18/2019	450.56
08	12/11/2019	449.06
08	12/12/2019	449.06
08	03/11/2020	449.02
08	03/12/2020	448.82
08	06/03/2020	454.94
08	06/04/2020	454.94
08	09/02/2020	449.69
08	09/03/2020	449.93
08	12/09/2020	447.52
08	12/10/2020	447.52
08	02/24/2021	446.41
08	03/18/2021	447.50
08	04/07/2021	447.77
08	04/08/2021	447.77
08	05/06/2021	449.09
08	06/08/2021	448.98
08	06/24/2021	449.26
08	07/13/2021	451.48
08	08/03/2021	449.67
08D	03/19/2015	447.06
08D	06/22/2015	455.57

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
08D	09/16/2015	448.24
08D	12/08/2015	447.92
08D	03/08/2016	447.52
08D	03/10/2016	447.52
08D	06/07/2016	447.60
08D	08/31/2016	450.19
08D	09/01/2016	450.19
08D	12/07/2016	448.09
08D	12/09/2016	448.09
08D	02/20/2017	447.60
08D	02/22/2017	447.60
08D	04/25/2017	450.79
08D	04/27/2017	450.79
08D	06/08/2017	450.50
08D	06/09/2017	450.50
08D	09/07/2017	448.99
08D	11/15/2017	448.54
08D	11/16/2017	448.54
08D	03/27/2018	449.16
08D	06/13/2018	449.94
08D	09/12/2018	449.12
08D	12/12/2018	448.29
08D	03/13/2019	449.45
08D	03/14/2019	449.45
08D	06/18/2019	453.14
08D	09/17/2019	450.44
08D	09/18/2019	450.44
08D	12/11/2019	448.76
08D	12/12/2019	448.76
08D	03/11/2020	448.55
08D	03/12/2020	448.55
08D	06/03/2020	454.55
08D	06/04/2020	454.55
08D	09/02/2020	449.72
08D	09/03/2020	449.72
08D	12/09/2020	447.22
08D	12/10/2020	447.22
08D	02/24/2021	446.21
08D	03/18/2021	447.34
08D	04/07/2021	447.56
08D	04/08/2021	447.56
08D	05/06/2021	449.06
08D	06/08/2021	448.75
08D	06/24/2021	449.31
08D	07/13/2021	451.44

TABLE C-1. GROUNDWATER ELEVATIONS
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
08D	08/03/2021	449.42
10	03/19/2015	447.01
10	06/22/2015	455.52
10	09/17/2015	448.32
10	12/09/2015	449.01
10	03/10/2016	447.63
10	03/11/2016	447.63
10	06/07/2016	448.63
10	06/08/2016	448.63
10	08/31/2016	450.27
10	09/01/2016	450.27
10	12/07/2016	448.20
10	12/09/2016	448.20
10	02/20/2017	447.69
10	02/22/2017	447.69
10	04/25/2017	450.83
10	04/27/2017	450.83
10	06/08/2017	450.53
10	09/07/2017	448.98
10	11/15/2017	448.62
10	11/16/2017	448.62
10	03/27/2018	449.22
10	06/13/2018	449.96
10	09/12/2018	449.16
10	12/12/2018	448.43
10	03/13/2019	449.63
10	03/14/2019	449.63
10	06/18/2019	453.18
10	09/17/2019	450.08
10	12/11/2019	449.02
10	12/12/2019	449.02
10	03/11/2020	448.62
10	06/03/2020	454.46
10	06/04/2020	454.46
10	09/02/2020	449.43
10	12/09/2020	447.30
10	12/10/2020	447.30
10	03/17/2021	447.31
10	03/18/2021	447.45
10	03/22/2021	447.45
10	04/07/2021	447.62
10	05/05/2021	448.73
10	06/08/2021	448.74
10	06/24/2021	448.24
10	07/13/2021	451.33

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
10	08/03/2021	449.41
11	07/13/2021	451.38
12	03/19/2015	447.09
12	06/22/2015	455.60
12	09/17/2015	448.29
12	12/08/2015	448.97
12	12/09/2015	448.97
12	03/08/2016	447.56
12	03/10/2016	447.56
12	06/07/2016	448.60
12	06/08/2016	448.60
12	08/31/2016	450.22
12	12/07/2016	448.14
12	12/09/2016	448.14
12	02/20/2017	447.61
12	02/22/2017	447.61
12	04/25/2017	450.79
12	04/26/2017	450.79
12	06/08/2017	450.50
12	06/09/2017	450.50
12	09/07/2017	448.96
12	11/15/2017	448.58
12	11/16/2017	448.58
12	03/26/2018	449.24
12	06/13/2018	449.94
12	09/12/2018	449.13
12	12/12/2018	448.34
12	03/13/2019	449.53
12	06/18/2019	453.18
12	09/17/2019	450.08
12	12/11/2019	457.48
12	03/11/2020	448.54
12	06/03/2020	454.49
12	06/04/2020	454.49
12	09/02/2020	449.42
12	12/09/2020	447.24
12	12/10/2020	447.24
12	03/18/2021	447.12
12	03/22/2021	447.38
12	04/07/2021	447.60
12	05/05/2021	448.78
12	06/08/2021	448.68
12	06/23/2021	449.15
12	07/13/2021	451.34
12	08/03/2021	449.35

TABLE C-1. GROUNDWATER ELEVATIONS
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
13	03/19/2015	447.07
13	06/22/2015	455.58
13	09/17/2015	448.30
13	12/08/2015	449.00
13	12/09/2015	449.00
13	03/08/2016	447.59
13	03/10/2016	447.59
13	06/07/2016	448.66
13	06/08/2016	448.66
13	08/31/2016	450.23
13	12/07/2016	448.16
13	12/09/2016	448.16
13	02/20/2017	447.63
13	02/22/2017	447.63
13	04/25/2017	450.79
13	04/27/2017	450.79
13	06/08/2017	450.53
13	06/09/2017	450.53
13	09/07/2017	448.98
13	11/15/2017	448.72
13	11/16/2017	448.72
13	03/26/2018	449.26
13	06/13/2018	449.94
13	09/12/2018	449.14
13	12/12/2018	448.35
13	03/13/2019	449.56
13	06/18/2019	453.18
13	09/17/2019	450.09
13	12/11/2019	448.82
13	03/11/2020	448.57
13	06/03/2020	454.51
13	06/04/2020	454.51
13	09/02/2020	449.47
13	12/09/2020	447.28
13	12/10/2020	447.28
13	02/24/2021	446.28
13	03/18/2021	447.15
13	03/22/2021	447.47
13	04/07/2021	447.61
13	05/05/2021	448.77
13	06/08/2021	448.69
13	06/23/2021	449.18
13	07/13/2021	451.35
13	08/03/2021	449.33
15	03/19/2015	447.12

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
15	06/22/2015	455.65
15	09/17/2015	448.25
15	12/09/2015	448.92
15	03/08/2016	447.41
15	03/10/2016	447.41
15	06/07/2016	448.56
15	06/08/2016	448.56
15	08/31/2016	450.15
15	12/07/2016	448.03
15	12/08/2016	448.03
15	02/20/2017	447.45
15	02/22/2017	447.45
15	04/25/2017	450.64
15	04/26/2017	450.64
15	06/08/2017	450.36
15	09/07/2017	448.85
15	11/15/2017	448.47
15	11/16/2017	448.47
15	03/26/2018	449.04
15	06/13/2018	449.81
15	09/12/2018	449.03
15	12/12/2018	448.16
15	03/13/2019	449.28
15	06/18/2019	452.93
15	09/17/2019	449.89
15	12/11/2019	448.60
15	03/11/2020	448.32
15	06/03/2020	454.25
15	06/04/2020	454.25
15	09/02/2020	449.69
15	09/03/2020	449.69
15	12/09/2020	447.10
15	12/10/2020	447.10
15	02/24/2021	446.09
15	03/17/2021	447.02
15	03/18/2021	447.02
15	03/22/2021	456.18
15	04/07/2021	447.46
15	05/05/2021	448.63
15	06/08/2021	448.55
15	06/24/2021	449.25
15	07/13/2021	450.35
15	08/03/2021	449.35
16	03/19/2015	447.00
16	06/22/2015	455.54

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
16	09/17/2015	448.26
16	12/08/2015	448.89
16	03/08/2016	447.49
16	03/10/2016	447.49
16	06/07/2016	448.57
16	06/08/2016	448.57
16	08/31/2016	450.19
16	09/01/2016	450.19
16	12/07/2016	448.08
16	12/09/2016	448.08
16	02/20/2017	447.56
16	02/22/2017	447.56
16	04/25/2017	450.71
16	04/27/2017	450.71
16	06/08/2017	450.53
16	09/07/2017	448.97
16	11/15/2017	448.53
16	11/16/2017	448.53
16	03/27/2018	449.08
16	06/13/2018	449.93
16	09/12/2018	449.11
16	12/12/2018	448.24
16	03/13/2019	449.45
16	03/14/2019	483.83
16	06/18/2019	453.22
16	09/17/2019	450.44
16	09/18/2019	450.44
16	12/11/2019	448.74
16	12/12/2019	448.74
16	03/11/2020	448.49
16	03/12/2020	448.49
16	06/03/2020	454.57
16	06/04/2020	454.57
16	09/02/2020	449.52
16	09/03/2020	449.52
16	12/09/2020	447.16
16	12/10/2020	447.16
16	02/24/2021	446.18
16	03/17/2021	447.12
16	03/18/2021	447.24
16	04/07/2021	447.48
16	04/08/2021	447.48
16	05/06/2021	449.14
16	06/08/2021	448.76
16	06/23/2021	449.29

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
16	07/13/2021	452.53
16	08/03/2021	449.47
17	03/19/2015	447.77
17	06/22/2015	456.28
17	09/17/2015	451.54
17	12/08/2015	451.01
17	03/08/2016	448.60
17	03/10/2016	448.60
17	06/07/2016	452.01
17	06/08/2016	452.01
17	08/31/2016	452.83
17	09/01/2016	452.83
17	12/07/2016	449.78
17	12/09/2016	449.78
17	02/20/2017	448.65
17	02/22/2017	448.65
17	04/25/2017	452.78
17	04/27/2017	452.78
17	06/08/2017	455.36
17	09/07/2017	454.56
17	11/15/2017	452.49
17	11/16/2017	452.49
17	03/27/2018	449.86
17	06/13/2018	454.63
17	09/12/2018	454.77
17	03/13/2019	450.07
17	03/14/2019	450.07
17	06/18/2019	457.12
17	09/17/2019	456.61
17	09/18/2019	456.61
17	12/11/2019	449.66
17	12/12/2019	449.66
17	03/11/2020	449.23
17	03/12/2020	449.23
17	06/03/2020	457.92
17	06/04/2020	457.92
17	09/02/2020	454.51
17	09/03/2020	454.51
17	12/09/2020	448.45
17	12/10/2020	448.45
17	02/24/2021	447.45
17	03/17/2021	447.93
17	03/18/2021	448.04
17	04/07/2021	450.39
17	04/08/2021	450.39

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
17	05/06/2021	453.68
17	06/08/2021	452.59
17	06/23/2021	453.57
17	07/13/2021	454.14
17	08/03/2021	453.33
18S	03/18/2015	447.02
18S	06/23/2015	455.73
18S	09/16/2015	447.90
18S	12/08/2015	448.84
18S	12/09/2015	448.84
18S	03/08/2016	447.32
18S	03/09/2016	447.32
18S	06/07/2016	448.22
18S	06/08/2016	448.22
18S	08/31/2016	450.13
18S	12/07/2016	447.87
18S	12/08/2016	447.87
18S	02/20/2017	447.33
18S	02/22/2017	447.33
18S	04/25/2017	450.58
18S	04/26/2017	450.58
18S	06/08/2017	450.07
18S	06/09/2017	450.07
18S	09/07/2017	448.40
18S	11/15/2017	448.14
18S	11/16/2017	448.14
18S	03/26/2018	448.96
18S	06/13/2018	449.79
18S	09/12/2018	448.63
18S	12/12/2018	448.19
18S	03/13/2019	449.45
18S	06/18/2019	452.94
18S	09/17/2019	449.75
18S	12/11/2019	448.46
18S	12/12/2019	448.46
18S	03/11/2020	448.48
18S	03/12/2020	448.48
18S	06/03/2020	454.35
18S	09/02/2020	447.86
18S	09/03/2020	447.86
18S	12/09/2020	446.88
18S	02/24/2021	446.12
18S	03/18/2021	447.12
18S	03/22/2021	447.27
18S	04/07/2021	447.30

TABLE C-1. GROUNDWATER ELEVATIONS
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
18S	05/05/2021	448.31
18S	06/08/2021	448.26
18S	06/25/2021	448.90
18S	07/13/2021	451.05
18S	08/03/2021	448.80
18D	03/18/2015	447.00
18D	06/23/2015	455.75
18D	09/16/2015	447.65
18D	12/08/2015	448.78
18D	12/09/2015	448.78
18D	03/08/2016	447.23
18D	03/09/2016	447.23
18D	06/07/2016	448.05
18D	06/08/2016	448.05
18D	08/31/2016	450.12
18D	12/07/2016	447.76
18D	12/08/2016	447.76
18D	02/20/2017	447.18
18D	02/22/2017	447.18
18D	04/25/2017	450.45
18D	04/26/2017	450.45
18D	06/08/2017	449.78
18D	06/09/2017	449.78
18D	09/07/2017	448.04
18D	11/15/2017	447.93
18D	11/16/2017	448.70
18D	03/26/2018	448.80
18D	06/13/2018	449.71
18D	09/12/2018	448.36
18D	12/12/2018	448.13
18D	03/13/2019	449.41
18D	06/18/2019	452.85
18D	09/17/2019	449.45
18D	12/11/2019	448.24
18D	12/12/2019	448.24
18D	03/11/2020	448.42
18D	03/12/2020	448.42
18D	06/03/2020	454.26
18D	09/02/2020	448.51
18D	09/03/2020	448.51
18D	12/09/2020	446.66
18D	02/24/2021	446.02
18D	03/18/2021	446.90
18D	03/22/2021	447.18
18D	04/07/2021	447.11

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
18D	05/05/2021	448.09
18D	06/08/2021	447.99
18D	06/25/2021	448.69
18D	07/13/2021	450.96
18D	08/03/2021	448.43
19S	03/18/2015	447.03
19S	06/23/2015	455.65
19S	09/16/2015	448.19
19S	12/09/2015	448.90
19S	03/08/2016	447.55
19S	03/09/2016	447.55
19S	06/07/2016	448.50
19S	06/08/2016	448.50
19S	08/31/2016	450.14
19S	12/07/2016	448.00
19S	12/08/2016	448.00
19S	02/20/2017	447.46
19S	02/22/2017	447.46
19S	04/25/2017	450.66
19S	04/26/2017	450.66
19S	06/08/2017	450.29
19S	09/07/2017	448.76
19S	11/15/2017	448.41
19S	11/16/2017	448.41
19S	03/26/2018	448.44
19S	06/13/2018	449.81
19S	09/12/2018	448.92
19S	12/12/2018	448.21
19S	03/13/2019	449.34
19S	06/18/2019	452.86
19S	09/17/2019	449.76
19S	12/11/2019	448.57
19S	03/11/2020	448.31
19S	06/03/2020	454.24
19S	09/02/2020	449.08
19S	09/03/2020	447.46
19S	12/09/2020	447.02
19S	02/24/2021	446.42
19S	03/17/2021	446.97
19S	03/18/2021	446.97
19S	03/22/2021	447.16
19S	04/07/2021	447.37
19S	05/05/2021	448.44
19S	06/08/2021	448.37
19S	06/24/2021	448.55

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
19S	07/13/2021	450.96
19S	08/03/2021	449.01
19D	03/18/2015	447.00
19D	06/23/2015	455.61
19D	09/16/2015	448.07
19D	12/09/2015	448.84
19D	03/08/2016	447.36
19D	03/09/2016	447.36
19D	06/07/2016	448.42
19D	06/08/2016	448.42
19D	08/31/2016	450.13
19D	12/07/2016	447.93
19D	12/08/2016	447.93
19D	02/20/2017	447.39
19D	02/22/2017	447.39
19D	04/25/2017	450.56
19D	04/26/2017	450.56
19D	06/08/2017	450.21
19D	09/07/2017	448.62
19D	11/15/2017	448.29
19D	11/16/2017	448.29
19D	03/26/2018	449.99
19D	06/13/2018	449.74
19D	09/12/2018	448.79
19D	12/12/2018	448.19
19D	03/13/2019	449.29
19D	06/18/2019	452.87
19D	09/17/2019	449.72
19D	12/11/2019	448.49
19D	03/11/2020	448.32
19D	06/03/2020	454.28
19D	09/02/2020	449.04
19D	09/03/2020	448.69
19D	12/09/2020	447.00
19D	02/24/2021	446.08
19D	03/17/2021	446.91
19D	03/18/2021	446.91
19D	03/22/2021	447.15
19D	04/07/2021	447.36
19D	05/05/2021	448.44
19D	06/08/2021	448.37
19D	06/24/2021	449.01
19D	07/13/2021	451.03
19D	08/03/2021	449.00
40S	03/18/2015	447.03

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
40S	06/23/2015	455.70
40S	09/16/2015	448.14
40S	12/08/2015	448.90
40S	12/09/2015	448.90
40S	03/08/2016	446.47
40S	03/09/2016	446.47
40S	06/07/2016	448.48
40S	06/08/2016	448.48
40S	08/31/2016	450.16
40S	12/07/2016	448.01
40S	12/08/2016	448.01
40S	02/20/2017	447.48
40S	02/22/2017	447.48
40S	04/25/2017	450.67
40S	04/26/2017	450.67
40S	06/08/2017	450.44
40S	09/07/2017	448.75
40S	11/15/2017	448.38
40S	11/16/2017	448.38
40S	03/26/2018	449.08
40S	06/13/2018	449.83
40S	09/12/2018	448.93
40S	12/12/2018	448.27
40S	03/13/2019	449.39
40S	06/18/2019	453.02
40S	09/17/2019	449.92
40S	12/11/2019	448.63
40S	12/12/2019	448.63
40S	03/11/2020	448.46
40S	06/03/2020	454.39
40S	09/02/2020	449.22
40S	09/03/2020	449.22
40S	12/09/2020	447.08
40S	03/18/2021	447.02
40S	06/24/2021	449.12
45S	12/08/2015	448.85
45S	03/08/2016	447.62
45S	06/07/2016	448.37
45S	08/31/2016	450.07
45S	12/07/2016	448.00
45S	02/20/2017	447.53
45S	04/25/2017	450.61
45S	06/08/2017	450.13
45S	06/09/2017	450.13
45S	11/15/2017	448.33

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
45S	06/13/2018	449.74
45S	09/12/2018	448.74
45S	03/13/2019	449.51
45S	09/17/2019	449.78
45S	03/11/2020	448.53
45S	06/03/2020	454.13
45S	09/02/2020	449.03
45S	12/09/2020	447.14
45S	02/24/2021	415.09
45S	03/18/2021	447.10
45S	04/07/2021	447.39
45S	05/05/2021	448.38
45S	06/08/2021	448.32
45S	06/25/2021	448.97
45S	07/13/2021	450.98
45S	08/03/2021	448.93
46	12/08/2015	449.07
46	03/08/2016	447.63
46	06/07/2016	448.71
46	08/31/2016	450.31
46	12/07/2016	448.21
46	02/20/2017	447.68
46	04/25/2017	450.85
46	06/08/2017	450.60
46	06/09/2017	450.60
46	11/15/2017	448.66
46	06/13/2018	450.01
46	09/12/2018	449.23
46	03/13/2019	449.63
46	09/17/2019	450.17
46	03/11/2020	448.61
46	06/03/2020	454.56
46	09/02/2020	449.53
46	12/09/2020	446.81
46	03/18/2021	447.23
46	03/22/2021	447.41
46	04/07/2021	447.65
46	05/05/2021	448.89
46	06/08/2021	448.79
46	06/23/2021	449.20
46	07/13/2021	451.45
46	08/03/2021	449.52
47	12/08/2015	449.02
47	03/08/2016	447.60
47	06/07/2016	448.66

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
47	08/31/2016	450.28
47	09/01/2016	450.28
47	12/07/2016	448.18
47	02/20/2017	447.68
47	04/25/2017	450.84
47	06/08/2017	450.57
47	06/09/2017	450.57
47	11/15/2017	448.64
47	06/13/2018	449.97
47	09/12/2018	449.19
47	03/13/2019	449.58
47	09/17/2019	450.07
47	03/11/2020	448.57
47	06/03/2020	454.52
47	09/02/2020	449.15
47	12/09/2020	446.82
47	02/24/2021	446.07
47	03/18/2021	446.97
47	04/07/2021	447.35
47	05/05/2021	448.53
47	06/08/2021	448.47
47	06/23/2021	450.42
47	07/13/2021	451.10
47	08/03/2021	449.10
48	12/08/2015	448.92
48	03/08/2016	447.63
48	06/07/2016	448.52
48	06/08/2016	448.52
48	08/31/2016	450.23
48	12/07/2016	448.07
48	02/20/2017	447.53
48	04/25/2017	450.72
48	06/08/2017	450.35
48	11/15/2017	448.45
48	06/13/2018	449.87
48	09/12/2018	448.98
48	12/12/2018	448.34
48	03/13/2019	449.55
48	09/17/2019	450.02
48	03/11/2020	448.55
48	06/03/2020	454.41
48	09/02/2020	449.24
48	12/09/2020	447.16
48	03/18/2021	447.11
52	02/24/2021	446.17

TABLE C-1. GROUNDWATER ELEVATIONS
HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

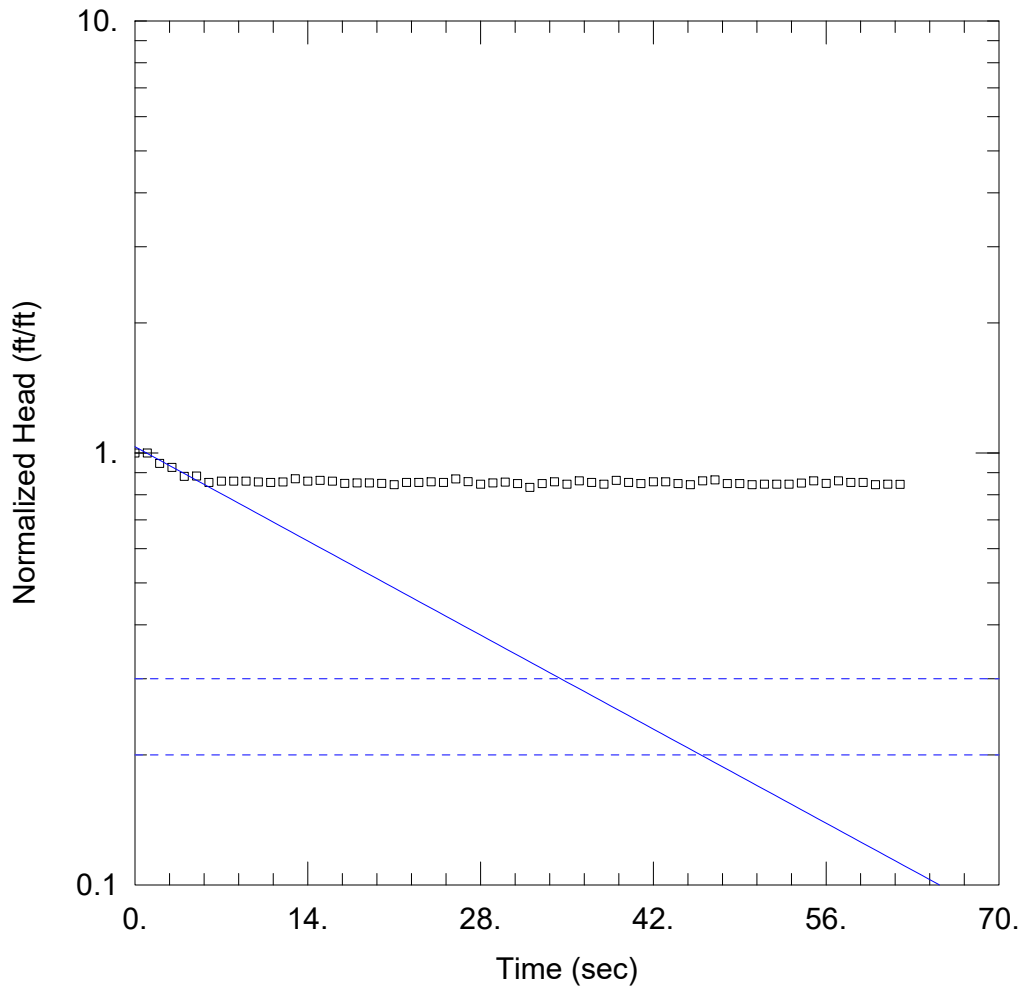
Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
52	03/22/2021	447.23
52	04/07/2021	447.45
52	05/06/2021	448.95
52	06/08/2021	448.62
52	06/24/2021	449.23
52	07/13/2021	451.28
52	08/03/2021	449.37
53	02/25/2021	446.24
53	03/19/2021	447.08
53	04/07/2021	446.45
53	04/08/2021	446.45
53	05/06/2021	448.97
53	06/08/2021	502.68
53	06/23/2021	449.09
53	07/13/2021	451.27
53	08/03/2021	449.29
54	02/24/2021	446.15
54	03/22/2021	447.15
54	04/07/2021	446.40
54	05/05/2021	448.66
54	06/08/2021	448.50
54	06/23/2021	448.99
54	07/13/2021	451.13
54	08/03/2021	449.18
55	02/25/2021	446.52
55	03/22/2021	447.41
55	04/07/2021	447.61
55	05/05/2021	446.92
55	06/08/2021	448.87
55	06/23/2021	448.91
55	07/13/2021	450.56
55	08/03/2021	449.87
XPW01	02/26/2021	490.18
XPW01	03/22/2021	491.22
XPW01	04/07/2021	491.37
XPW01	04/08/2021	491.37
XPW01	05/06/2021	490.94
XPW01	06/08/2021	491.84
XPW01	06/23/2021	493.18
XPW01	07/13/2021	488.47
XPW01	08/03/2021	492.27
XPW02	02/25/2021	491.70
XPW02	03/22/2021	491.26
XPW02	04/07/2021	490.38
XPW02	04/08/2021	491.97

TABLE C-1. GROUNDWATER ELEVATIONS
 HYDROGEOLOGIC SITE CHARACTERIZATION REPORT
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	Sample Date	Groundwater Elevation (ft NAVD88)
XPW02	05/06/2021	489.60
XPW02	06/08/2021	490.71
XPW02	06/23/2021	489.75
XPW02	07/13/2021	496.18
XPW02	08/03/2021	490.99
XPW03	02/26/2021	488.94
XPW03	03/22/2021	489.79
XPW03	04/07/2021	489.55
XPW03	05/05/2021	489.26
XPW03	06/08/2021	489.88
XPW03	06/23/2021	489.46
XPW03	07/13/2021	490.82
XPW03	08/03/2021	490.32
XSG01	02/26/2021	487.44
XSG01	03/22/2021	487.61
XSG01	04/07/2021	487.88
XSG01	05/05/2021	477.71
XSG01	06/08/2021	487.72
XSG01	06/23/2021	474.06
XSG01	07/13/2021	488.19
XSG01	08/03/2021	488.29
SG02	02/25/2021	443.75
SG02	03/22/2021	445.50
SG02	04/07/2021	442.25
SG02	04/08/2021	442.25
SG02	05/06/2021	442.00
SG02	06/08/2021	442.00
SG02	06/23/2021	442.25
SG02	07/13/2021	447.00
SG02	08/03/2021	441.00

Notes:
 ft NAVD88 = feet relative to the North American Vertical Datum 1988, GEOID 12A
 generated 10/05/2021, 4:08:36 PM CDT

**APPENDIX D
HYDRAULIC CONDUCTIVITY TEST DATA**



SLUG TEST MW-53

Data Set: P:\Projects\Hennepin\AqtSolv Reports\MW-53\MW-53 Trial 1.aqt
 Date: 04/02/21 Time: 13:17:59

PROJECT INFORMATION

Company: Geosyntec
 Client: Vistra
 Project: GLP8020
 Location: Hennepin, IL
 Test Well: MW-53
 Test Date: 2/12/2021

AQUIFER DATA

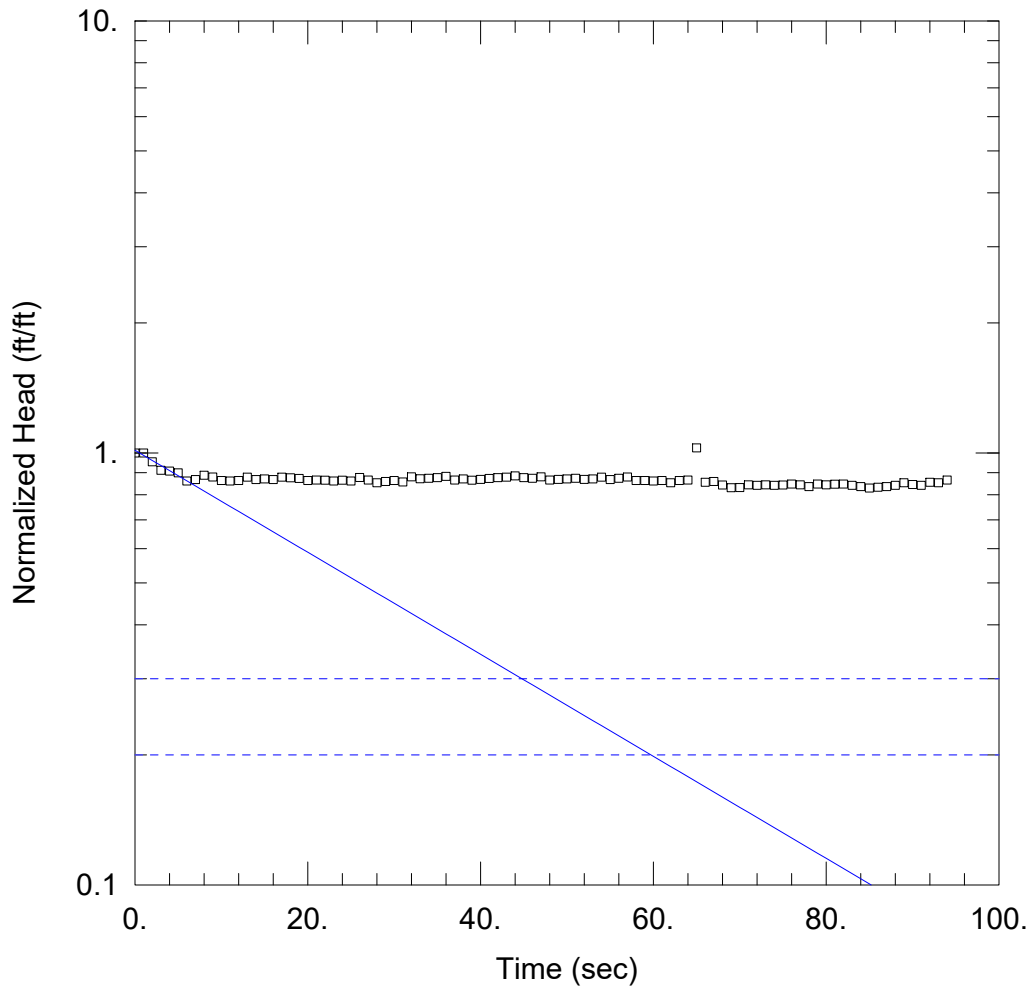
Saturated Thickness: 10.35 ft Anisotropy Ratio (Kz/Kr): 0.3

WELL DATA (MW-53)

Initial Displacement: 0.755 ft Static Water Column Height: 10.35 ft
 Total Well Penetration Depth: 67. ft Screen Length: 10. ft
 Casing Radius: 0.083 ft Well Radius: 0.083 ft
 Gravel Pack Porosity: 0.

SOLUTION

Aquifer Model: Unconfined Solution Method: Bower-Rice
 K = 0.002045 cm/sec y0 = 0.7803 ft



SLUG TEST MW-53

Data Set: P:\Projects\Hennepin\AqtSolv Reports\MW-53\MW-53 Trial 2.aqt
 Date: 03/31/21 Time: 17:51:54

PROJECT INFORMATION

Company: Geosyntec
 Client: Vistra
 Project: GLP8020
 Location: Hennepin, IL
 Test Well: MW-53
 Test Date: 2/12/2021

AQUIFER DATA

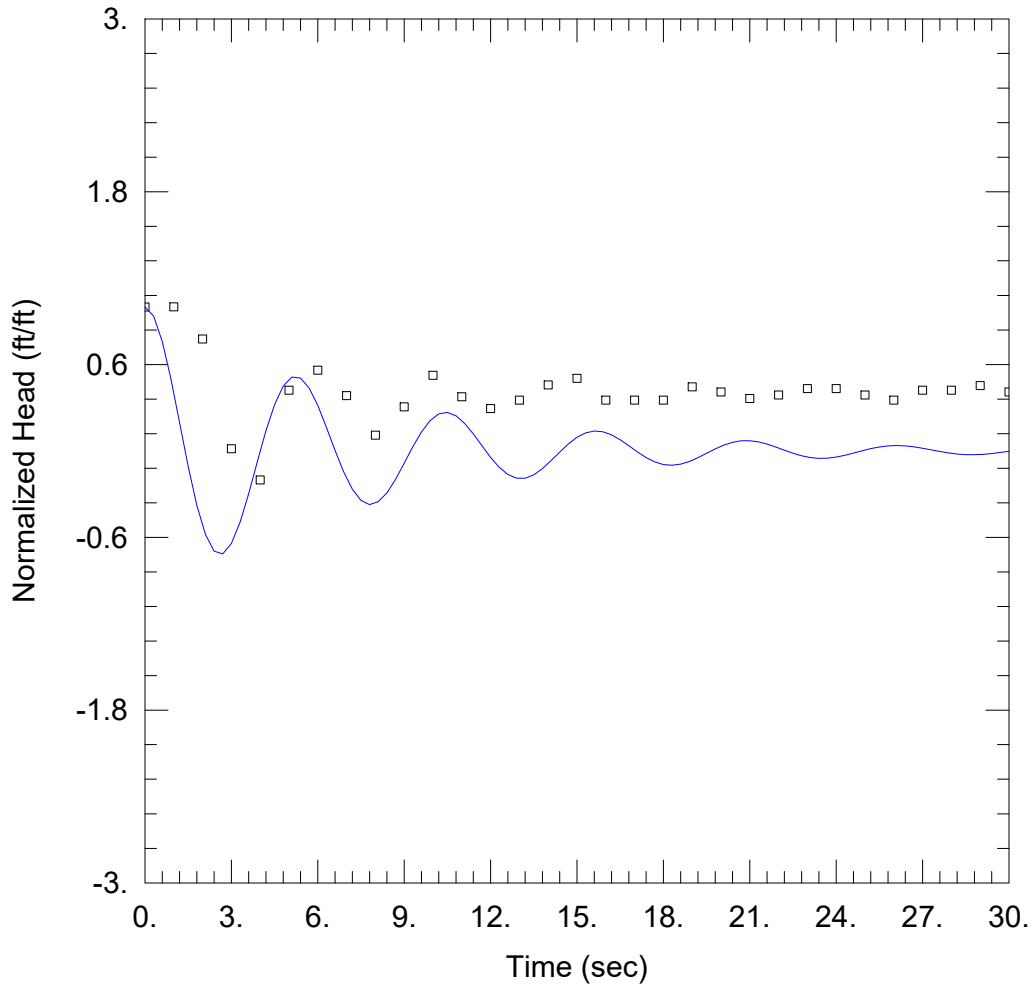
Saturated Thickness: 10.35 ft Anisotropy Ratio (Kz/Kr): 0.3

WELL DATA (MW-53)

Initial Displacement: 0.7489 ft Static Water Column Height: 10.35 ft
 Total Well Penetration Depth: 67. ft Screen Length: 10. ft
 Casing Radius: 0.083 ft Well Radius: 0.083 ft
 Gravel Pack Porosity: 0.

SOLUTION

Aquifer Model: Unconfined Solution Method: Bower-Rice
 K = 0.001552 cm/sec y0 = 0.7596 ft



SLUG TEST MW-54

Data Set: C:\Users\alamore\Documents\Hennepin\MW-54 Trial 1.aqt
 Date: 03/31/21 Time: 16:46:16

PROJECT INFORMATION

Company: Geosyntec
 Client: Vistra
 Project: GLP8020
 Location: Hennepin, IL
 Test Well: MW-54
 Test Date: 2/17/2021

AQUIFER DATA

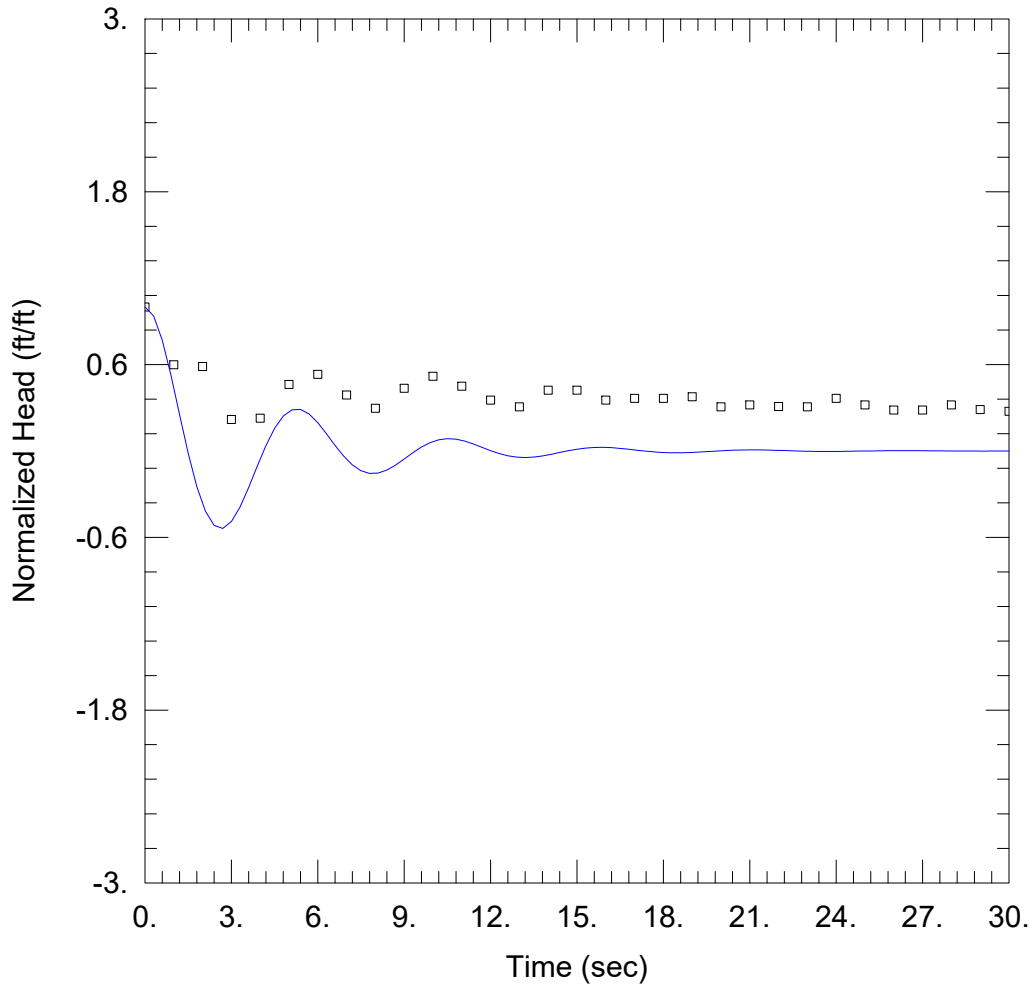
Saturated Thickness: 22.6 ft Anisotropy Ratio (Kz/Kr): 0.3

WELL DATA (MW-54)

Initial Displacement: 0.1301 ft Static Water Column Height: 22.6 ft
 Total Well Penetration Depth: 77. ft Screen Length: 10. ft
 Casing Radius: 0.083 ft Well Radius: 0.083 ft

SOLUTION

Aquifer Model: Unconfined Solution Method: Springer-Gelhar
 K = 0.3367 cm/sec Le = 21.96 ft



SLUG TEST MW-54

Data Set: C:\Users\alamore\Documents\Hennepin\MW-54 Trial 2.aqt
 Date: 03/31/21 Time: 16:51:09

PROJECT INFORMATION

Company: Geosyntec
 Client: Vistra
 Project: GLP8020
 Location: Hennepin, IL
 Test Well: MW-54
 Test Date: 2/17/2021

AQUIFER DATA

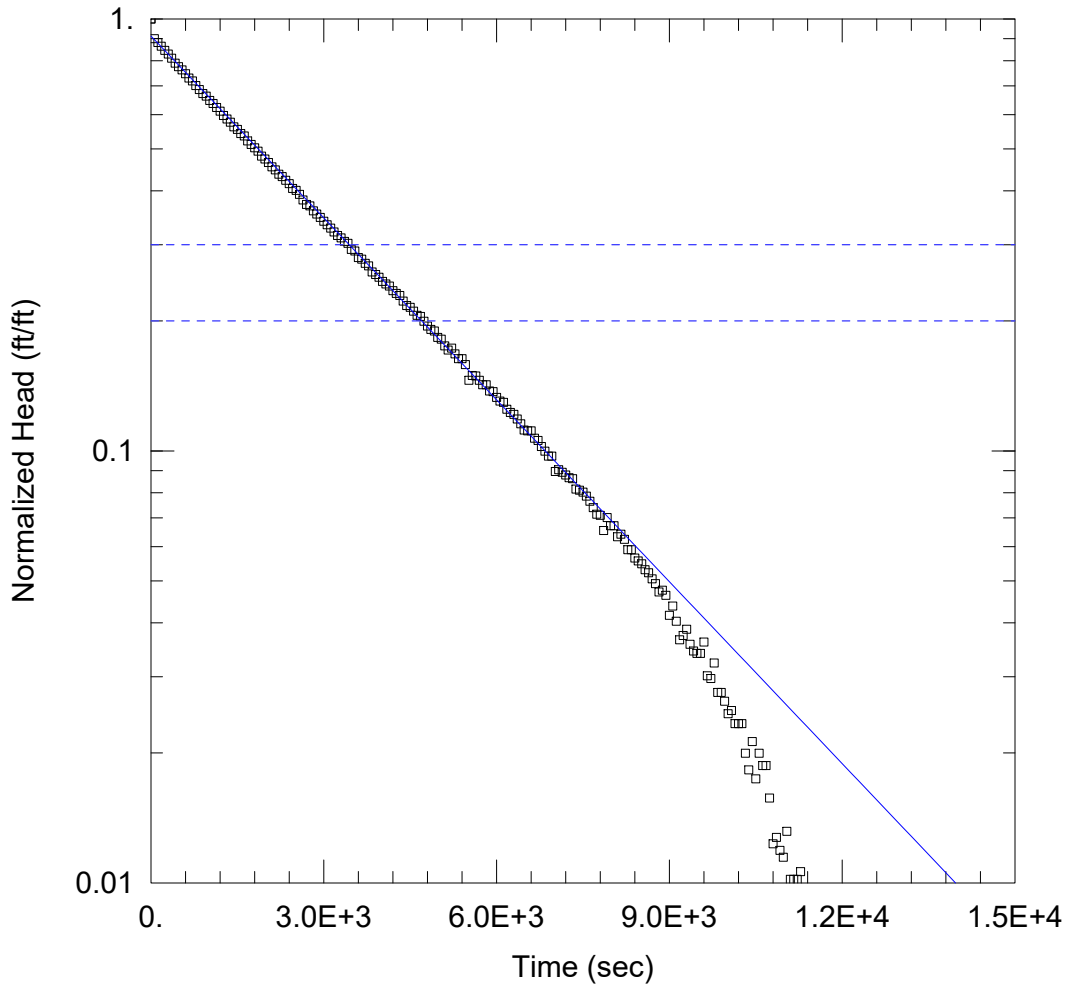
Saturated Thickness: 22.6 ft Anisotropy Ratio (Kz/Kr): 0.3

WELL DATA (MW-54)

Initial Displacement: 0.1301 ft Static Water Column Height: 22.6 ft
 Total Well Penetration Depth: 77 ft Screen Length: 10 ft
 Casing Radius: 0.083 ft Well Radius: 0.083 ft

SOLUTION

Aquifer Model: Unconfined Solution Method: Springer-Gelhar
 K = 0.1828 cm/sec Le = 21.82 ft



SLUG TEST MW-55

Data Set: P:\Projects\Hennepin\AqtSolv Reports\MW-55\MW-55BR.aqt
 Date: 03/31/21 Time: 17:54:45

PROJECT INFORMATION

Company: Geosyntec
 Client: Vistra
 Project: GLP8020
 Location: Hennepin, IL
 Test Well: MW-55
 Test Date: 3/9/2021

AQUIFER DATA

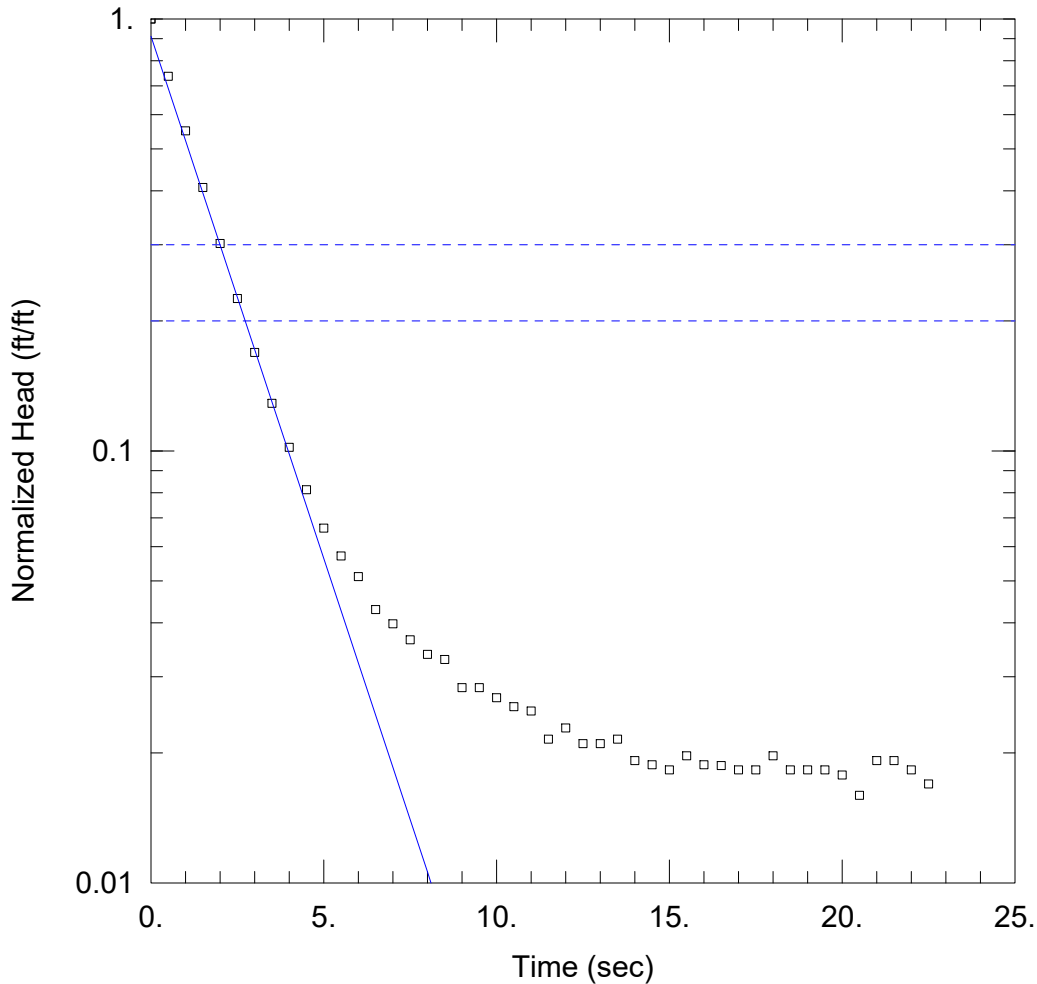
Saturated Thickness: 10. ft Anisotropy Ratio (Kz/Kr): 0.3

WELL DATA (MW-55)

Initial Displacement: 2.354 ft Static Water Column Height: 10. ft
 Total Well Penetration Depth: 95. ft Screen Length: 5. ft
 Casing Radius: 0.083 ft Well Radius: 0.083 ft
 Gravel Pack Porosity: 0.

SOLUTION

Aquifer Model: Unconfined Solution Method: Bower-Rice
 K = 3.647E-5 cm/sec y0 = 2.149 ft



SLUG TEST XPW-1

Data Set: Q:\...\XPW-1 Trial 1.aqt
 Date: 04/02/21

Time: 15:30:16

PROJECT INFORMATION

Company: Geosyntec
 Client: Vistra
 Project: GLP8020
 Location: Hennepin, IL
 Test Well: XPW-1
 Test Date: 2/17/2021

AQUIFER DATA

Saturated Thickness: 5.87 ft

Anisotropy Ratio (Kz/Kr): 0.3

WELL DATA (XPW-1)

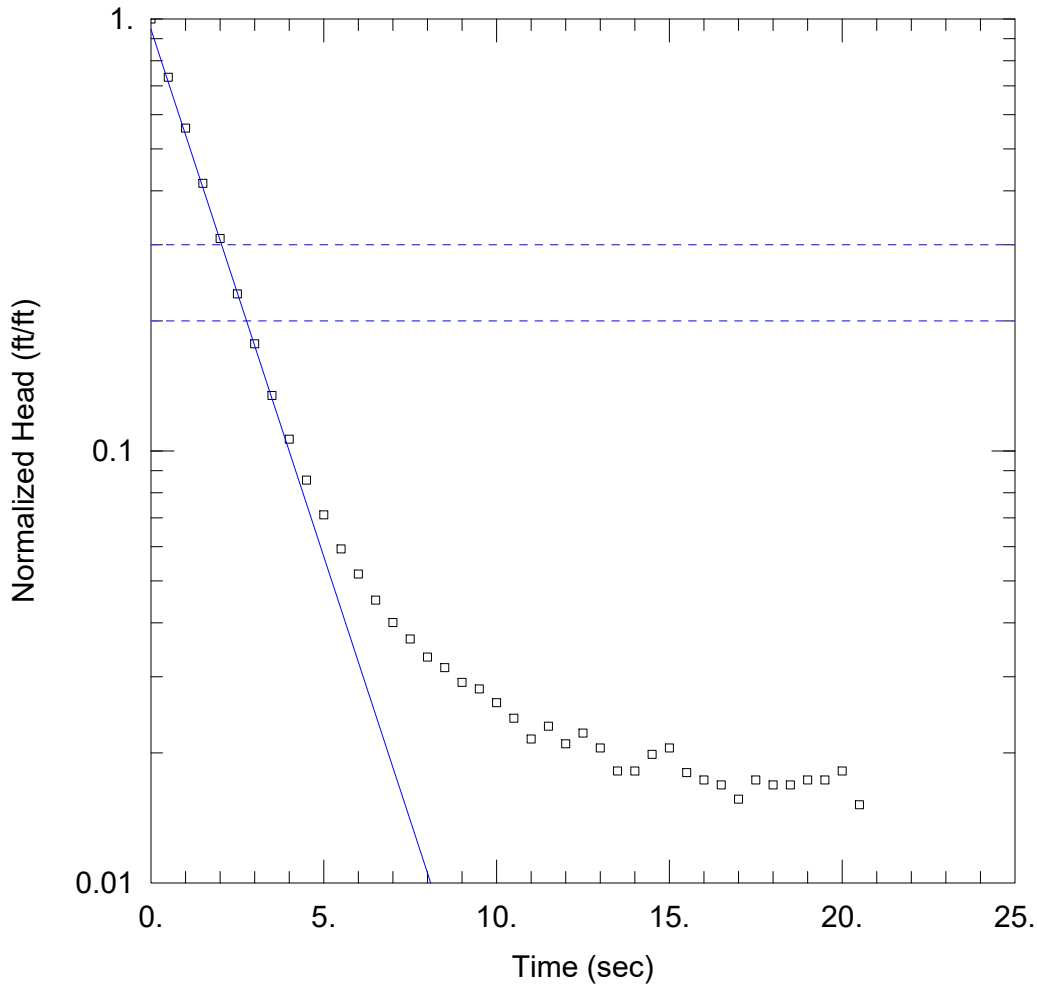
Initial Displacement: 3.292 ft
 Total Well Penetration Depth: 17.3 ft
 Casing Radius: 0.083 ft

Static Water Column Height: 5.87 ft
 Screen Length: 5 ft
 Well Radius: 0.083 ft
 Gravel Pack Porosity: 0

SOLUTION

Aquifer Model: Unconfined
 K = 0.05143 cm/sec

Solution Method: Bower-Rice
 y0 = 3.001 ft



SLUG TEST XPW-1

Data Set: Q:\...\XPW-1 Trial 2.aqt
 Date: 04/02/21

Time: 15:31:15

PROJECT INFORMATION

Company: Geosyntec
 Client: Vistra
 Project: GLP8020
 Location: Hennepin, IL
 Test Well: XPW-1
 Test Date: 2/17/2021

AQUIFER DATA

Saturated Thickness: 5.87 ft

Anisotropy Ratio (Kz/Kr): 0.3

WELL DATA (XPW-1)

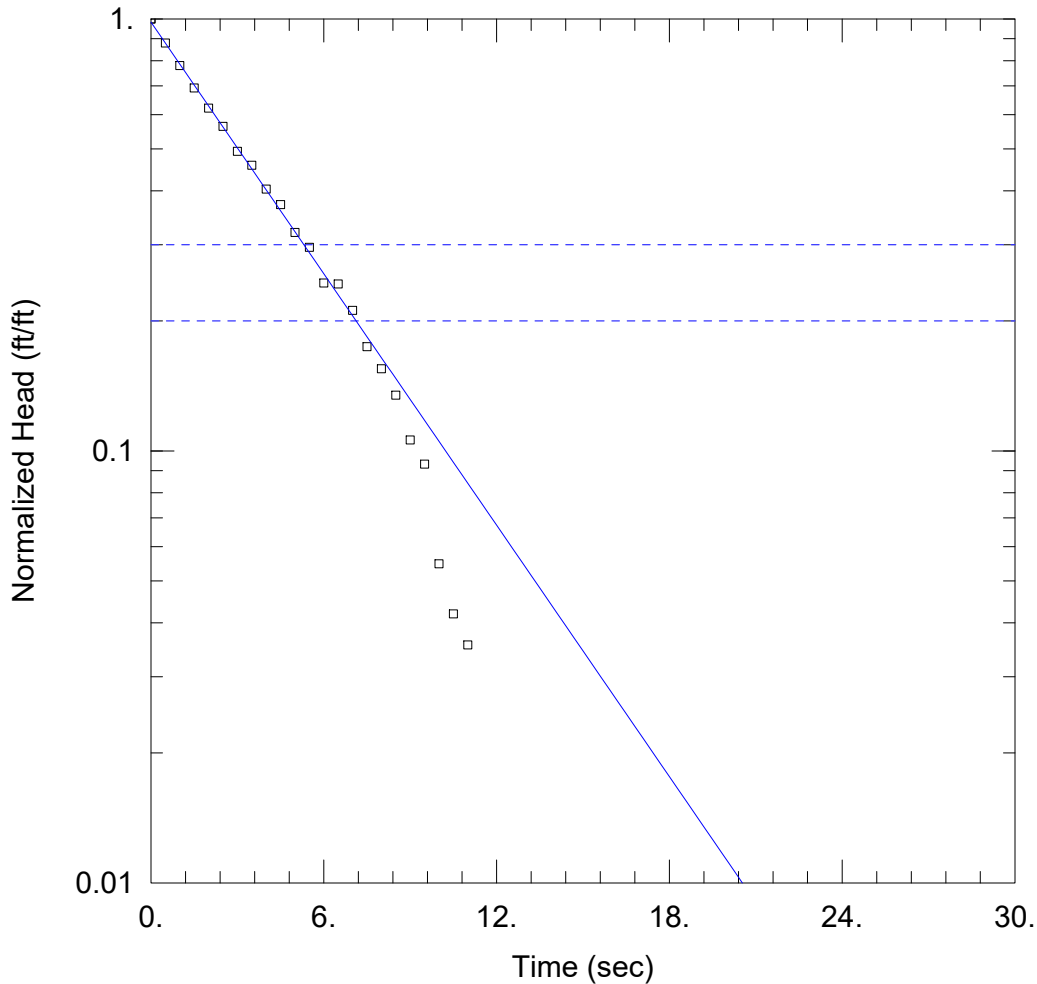
Initial Displacement: 3.568 ft
 Total Well Penetration Depth: 17.3 ft
 Casing Radius: 0.083 ft

Static Water Column Height: 5.87 ft
 Screen Length: 5 ft
 Well Radius: 0.083 ft
 Gravel Pack Porosity: 0

SOLUTION

Aquifer Model: Unconfined
 K = 0.05191 cm/sec

Solution Method: Bower-Rice
 y0 = 3.373 ft



SLUG TEST XPW-2

Data Set: P:\Projects\Hennepin\AqtSolv Reports\XPW-2\XPW-2 Trial 1.aqt
 Date: 04/09/21 Time: 15:18:38

PROJECT INFORMATION

Company: Geosyntec
 Client: Vistra
 Project: GLP8020
 Location: Hennepin, IL
 Test Well: XPW-2
 Test Date: 2/17/2021

AQUIFER DATA

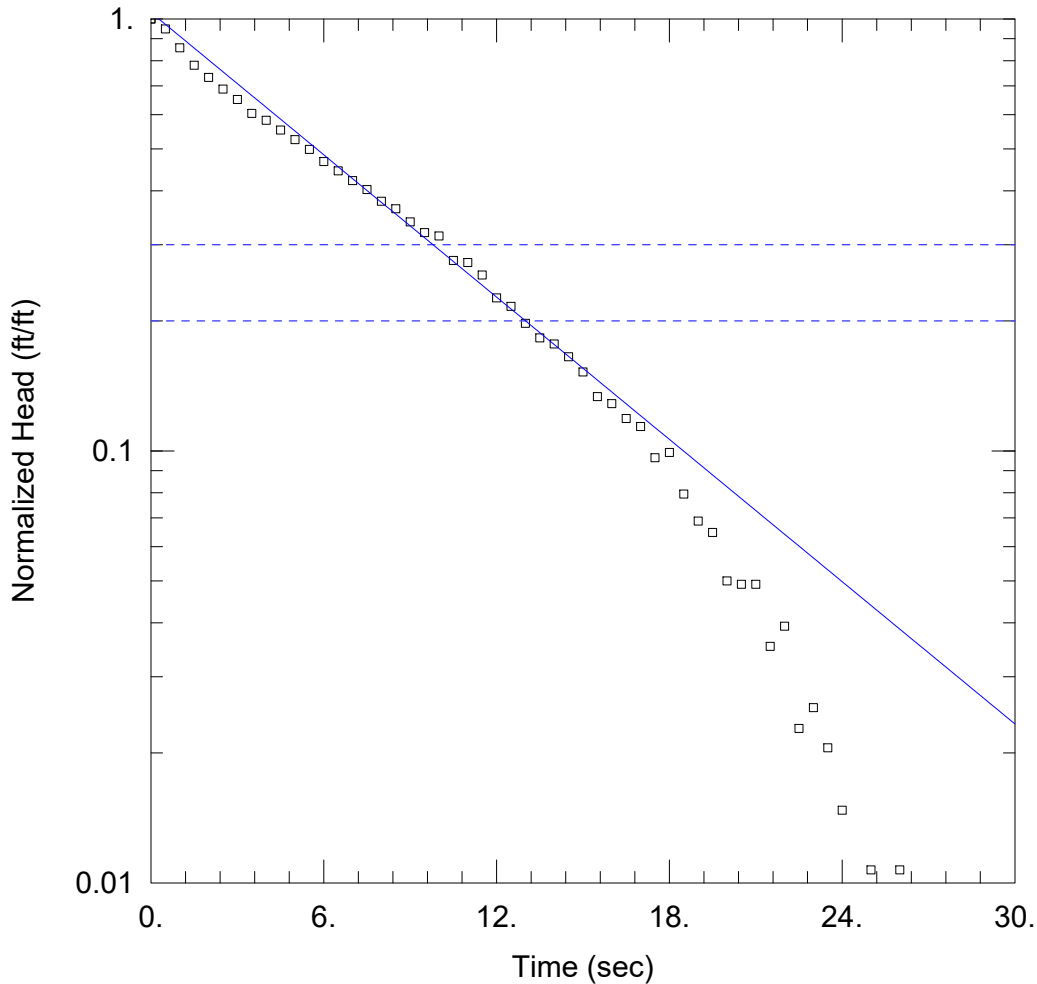
Saturated Thickness: 6. ft Anisotropy Ratio (Kz/Kr): 0.3

WELL DATA (XPW-2)

Initial Displacement: 0.4692 ft Static Water Column Height: 6. ft
 Total Well Penetration Depth: 21.8 ft Screen Length: 5. ft
 Casing Radius: 0.083 ft Well Radius: 0.083 ft
 Gravel Pack Porosity: 0.

SOLUTION

Aquifer Model: Unconfined Solution Method: Bowser-Rice
 K = 0.02129 cm/sec y0 = 0.4611 ft



SLUG TEST XPW-2

Data Set: P:\Projects\Hennepin\AqtSolv Reports\XPW-2\XPW-2 Trial 2.aqt
 Date: 04/09/21 Time: 15:20:01

PROJECT INFORMATION

Company: Geosyntec
 Client: Vistra
 Project: GLP8020
 Location: Hennepin, IL
 Test Well: XPW-2
 Test Date: 2/17/2021

AQUIFER DATA

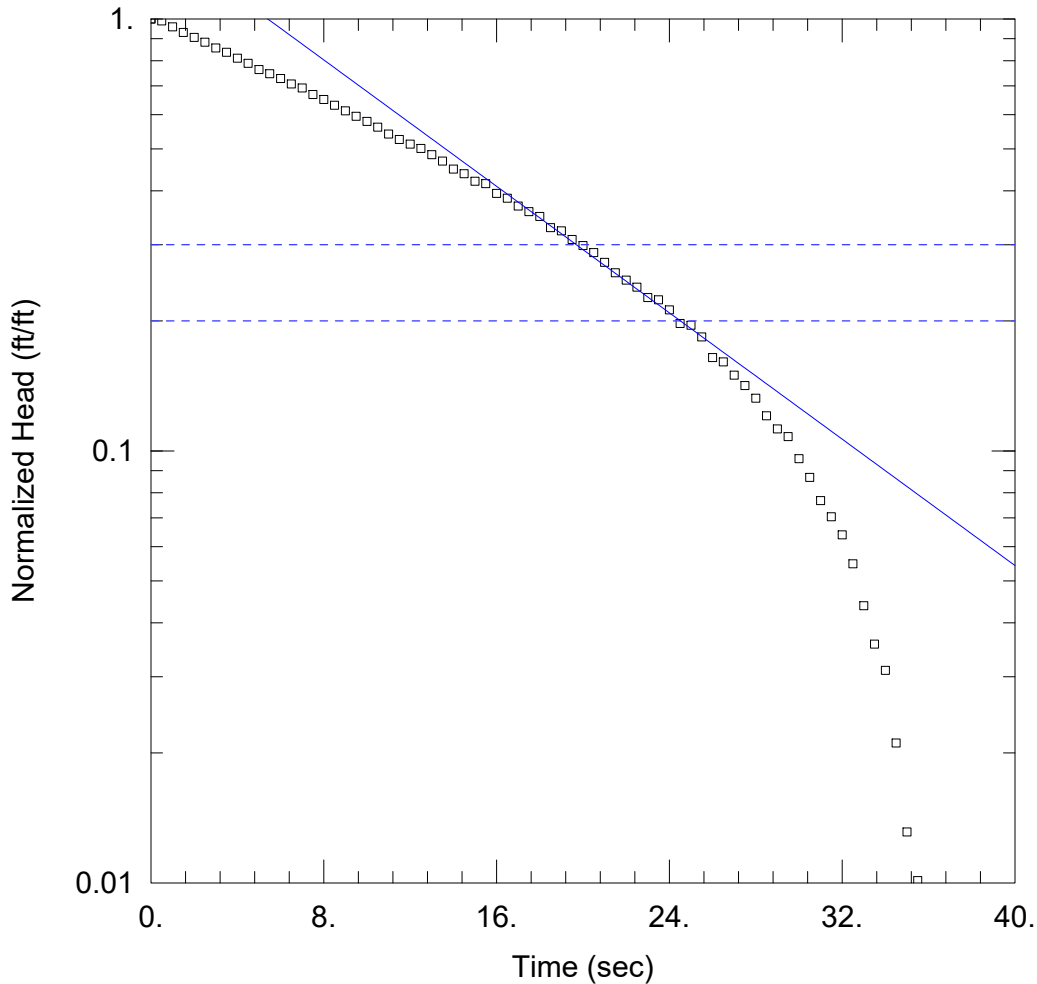
Saturated Thickness: 6. ft Anisotropy Ratio (Kz/Kr): 0.3

WELL DATA (XPW-2)

Initial Displacement: 0.6122 ft Static Water Column Height: 6. ft
 Total Well Penetration Depth: 21.8 ft Screen Length: 5. ft
 Casing Radius: 0.083 ft Well Radius: 0.083 ft
 Gravel Pack Porosity: 0.

SOLUTION

Aquifer Model: Unconfined Solution Method: Bower-Rice
 K = 0.01205 cm/sec y0 = 0.6335 ft



SLUG TEST XPW-3

Data Set: P:\Projects\Hennepin\AqtSolv Reports\XPW-3\XPW-3 Trial 1.aqt
 Date: 04/09/21 Time: 15:35:04

PROJECT INFORMATION

Company: Geosyntec
 Client: Vistra
 Project: GLP8020
 Location: Hennepin, IL
 Test Well: XPW-3
 Test Date: 2/17/2021

AQUIFER DATA

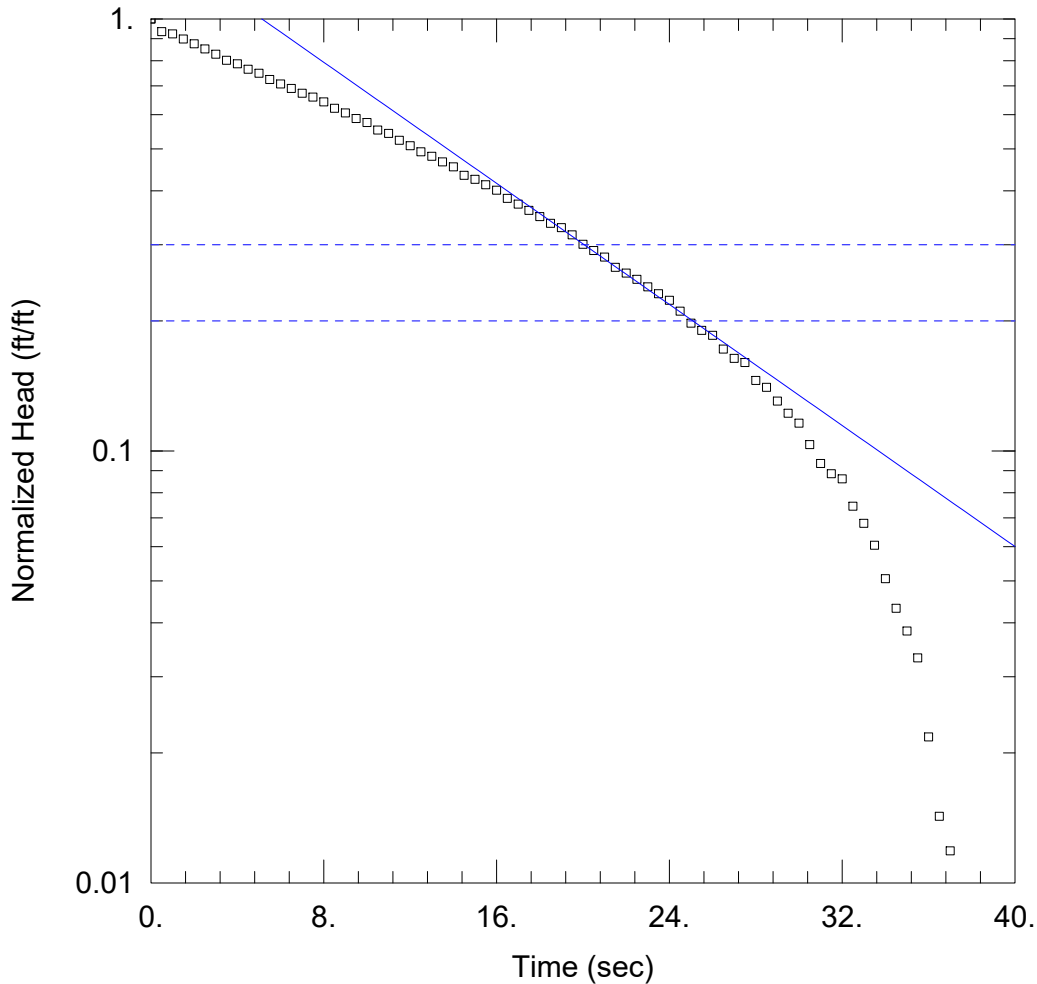
Saturated Thickness: 15.41 ft Anisotropy Ratio (Kz/Kr): 0.3

WELL DATA (XPW-3)

Initial Displacement: 1.647 ft Static Water Column Height: 15.41 ft
 Total Well Penetration Depth: 22.32 ft Screen Length: 5 ft
 Casing Radius: 0.083 ft Well Radius: 0.083 ft
 Gravel Pack Porosity: 0

SOLUTION

Aquifer Model: Unconfined Solution Method: Bower-Rice
 K = 0.008048 cm/sec y0 = 2.595 ft



SLUG TEST XPW-3

Data Set: P:\Projects\Hennepin\AqtSolv Reports\XPW-3\XPW-3 Trial 2.aqt
 Date: 04/09/21 Time: 15:36:55

PROJECT INFORMATION

Company: Geosyntec
 Client: Vistra
 Project: GLP8020
 Location: Hennepin, IL
 Test Well: XPW-3
 Test Date: 2/17/2021

AQUIFER DATA

Saturated Thickness: 15.41 ft Anisotropy Ratio (Kz/Kr): 0.3

WELL DATA (XPW-3)

Initial Displacement: 1.821 ft Static Water Column Height: 15.41 ft
 Total Well Penetration Depth: 22.32 ft Screen Length: 5 ft
 Casing Radius: 0.083 ft Well Radius: 0.083 ft
 Gravel Pack Porosity: 0

SOLUTION

Aquifer Model: Unconfined Solution Method: Bower-Rice
 K = 0.007708 cm/sec y0 = 2.755 ft

**APPENDIX E
INFORMATION PERTINENT TO 35 I.A.C. § 845.220(a)(3)**

TABLES

Table A-1. Surrounding Surface Water Bodies

Part 845

Hennepin East Ash Pond (Unit ID: 803)

Hennepin Power Station

Hennepin, Illinois

HUC	Surface Water ID	Distance from Unit (m)	Physical Orientation to Unit	Hydraulic Orientation to Unit	Classification Code	Size (acres)	Notes
07130001	Freshwater Pond 1	41	WSW	Sidegradient	PUBGx	0.48	
07130001	Freshwater Pond 2	121	S	Upgradient	PUBGx	0.59	
07130001	Riverine 1	127	E	Sidegradient	R4SBC	1.22	
07130001	Lake 1	171	SSW	Upgradient	L1UBHh	16872.11	
07130001	Freshwater Pond 3	196	S	Upgradient	PUBGx	2.14	
07130001	Freshwater Emergent Wetland 1	239	NE	Sidegradient	PEM1Fh	3.62	
07130001	Freshwater Forested/Shrub Wetland 1	294	NE	Sidegradient	PFO1Ch	1.37	
07130001	Freshwater Forested/Shrub Wetland 2	342	NE	Sidegradient	PFO1Ah	30.15	
07130001	Freshwater Emergent Wetland 2	639	N	Downgradient	PEM1Ch	31.96	
07130001	Freshwater Forested/Shrub Wetland 3	652	ENE	Sidegradient	PFO1Ch	11.24	
07130001	Freshwater Forested/Shrub Wetland 4	668	ENE	Sidegradient	PFO1Ch	22.48	
07130001	Freshwater Forested/Shrub Wetland 5	711	NW	Downgradient	PFO1Ch	270.10	
07130001	Freshwater Forested/Shrub Wetland 6	757	NE	Sidegradient	PFO1A	8.49	

Notes:

List of wetlands and water bodies obtained from the US Fish and Wildlife Service. Distance and direction were calculated by Geosyntec.

Based on groundwater elevation contour maps in the vicinity of the EAP from 2015 to 2020, groundwater predominantly flows to the north-northeast, towards the Illinois River (Ramboll, 2020).

Distance and direction from EAP were calculated by Geosyntec.

Wetlands and surface water features located within 1,000 meters of the Hennepin Power Station are included in this table.

Watershed codes are provided as HUC8.

m = meter/meters

EAP = East Ash Pond

HUC = Hydrologic Unit Code

E = east

ENE = east-northeast

N = north

NE = northeast

NW = northwest

S = south

SSW = south-southwest

WSW = west-southwest

Table A-2. Surrounding Wells

Part 845

Hennepin East Ash Pond (Unit ID: 803)

Hennepin Power Station

Hennepin, Illinois

Well Number	Date Constructed	Ground Elevation (ft NAVD88/ GEOID 12A)	Screen Top Depth (ft BGS)	Screen Bottom Depth (ft BGS)	Screen Top Elevation (ft NAVD88/ GEOID 12A)	Screen Bottom Elevation (ft NAVD88/ GEOID 12A)	Bottom of Boring Elevation (ft NAVD88/ GEOID 12A)	Screen Length (ft)	Screen Diameter (inches)	Well Depth from Ground Surface (ft bgs)
121552029200	8/31/1978	--	--	--	--	--	--	--	--	109
121552045800	6/11/1995	--	109	113	--	--	--	4	--	114
121552049700	10/16/1996	--	102	117	--	--	--	15	--	124
121552025800	6/30/1978	--	--	--	--	--	--	--	--	128
121552043500	9/29/1993	--	90	115	--	--	--	25	--	120
121550012800	8/31/1968	--	--	--	--	--	--	--	--	113
121552059800	--	--	--	--	--	--	--	--	--	114
121552059900	--	--	--	--	--	--	--	--	--	115
121552051800	8/24/1999	--	0	0	--	--	--	--	--	72
121552068500	11/14/2002	--	28	64	--	--	--	36	--	64

Notes:

Water well information obtained from the Illinois Geological Survey (ISGS) Illinois Water Wells (ILWATER) database.

Based on groundwater elevation contour maps in the vicinity of the EAP from 2015 to 2020, groundwater predominantly flows to the north-northeast, towards the Illinois River (Ramboll, 2020).

Distance and direction from EAP were calculated by Geosyntec.

Wells located within 3,280 ft. of the Site are included in this table.

bgs = below ground surface

D = downgradient

DD = decimal degrees

m = meter/meters

S = Source water (Porewater or Pond water)

Sd = Sidegradient

U = upgradient

-- = information not available

Table A-2. Surrounding Wells

Part 845

Hennepin East Ash Pond (Unit ID: 803)

Hennepin Power Station

Hennepin, Illinois

Well Number	Total Boring Depth (ft BGS)	State Planar Northing - Y (NAD83/ East Zone)	State Planar Easting - X (NAD 83/ East Zone)	Latitude (DD)	Longitude (DD)	X, Y Survey Date	Hydraulic Position Designation (B/Sd/U/D/P)	Distance from Unit (m)
121552029200	109	1688035.517	2533586.945	41.298332	-89.304115	--	U	331
121552045800	114	1690497.038	2534947.337	41.30505	-89.299075	--	Sd	346
121552049700	124	1687987.525	2534110.643	41.298186	-89.302211	--	U	400
121552025800	128	1687796.866	2533772.61	41.297672	-89.303448	--	U	415
121552043500	120	1690402.706	2531611.164	41.304882	-89.31122	--	D	454
121550012800	113	1690402.706	2531611.164	41.304882	-89.31122	--	D	454
121552059800	114	1690402.706	2531611.164	41.304882	-89.31122	--	D	454
121552059900	115	1689354.194	2530630.626	41.302031	-89.314826	--	Sd	699
121552051800	72	1687206.835	2535662.026	41.296001	-89.296594	--	U	822
121552068500	64	1687206.835	2535662.026	41.296001	-89.296594	--	U	822

Notes:

Water well information obtained from the Illinois Geological Survey (ISGS) Illinois Water Wells (ILWATER) database.

Based on groundwater elevation contour maps in the vicinity of the EAP from 2015 to 2020, groundwater predominantly flows to the north-northeast, towards the Illinois River (Ramboll, 2020).

Distance and direction from EAP were calculated by Geosyntec.

Wells located within 3,280 ft. of the EAP are included in this table.

bgs = below ground surface

D = downgradient

DD = decimal degrees

m = meter/meters

S= Source water (Porewater or Pond water)

Sd= Sidegradient

U = upgradient

-- = information not available

Table A-3 Threatened and Endangered Species

Part 845

Hennepin East Ash Pond (Unit ID: 803)

Hennepin Power Station

Hennepin, Illinois

Scientific Name	Common Name	Status	Distance from Unit (m)	Physical Orientation to Unit	Hydraulic Orientation to Unit	Occurrences	Last Observed	Notes
<i>Asio flammeus</i>	Short-eared Owl	LE	--	--	--	1	January 2012	Habitat identified at the county level only
<i>Boltonia decurrens</i>	Decurrent False Aster	LT	--	--	--	4	August 2018	Habitat identified at the county level only
<i>Bombus affinis</i>	Rusty Patched Bumble Bee	LE	--	--	--	1	August 2018	Habitat identified at the county level only
<i>Chlidonias niger</i>	Black Tern	LE	--	--	--	1	June 2004	Habitat identified at the county level only
<i>Circus hudsonius</i>	Northern Harrier	LE	--	--	--	1	December 2015	Habitat identified at the county level only
<i>Coregonus artedi</i>	Cisco	LE	--	--	--	1	October 1935	Habitat identified at the county level only
<i>Filipendula rubra</i>	Queen-of-the-prairie	LT	--	--	--	2	July 2014	Habitat identified at the county level only
<i>Fundulus dispar</i>	Starhead Topminnow	LT	--	--	--	1	August 2015	Habitat identified at the county level only
<i>Gallinula galeata</i>	Common Gallinule	LE	--	--	--	1	June 2017	Habitat identified at the county level only
<i>Heterodon nasicus</i>	Plains Hog-nosed Snake	LT	--	--	--	1	May 1905	Habitat identified at the county level only
<i>Ichthyomyzon fossor</i>	Northern Brook Lamprey	LE	--	--	--	1	April 2015	Habitat identified at the county level only
<i>Ixobrychus exilis</i>	Least Bittern	LT	--	--	--	1	June 2017	Habitat identified at the county level only
<i>Lanius ludovicianus</i>	Loggerhead Shrike	LE	--	--	--	1	June 1905	Habitat identified at the county level only
<i>Lepomis miniatus</i>	Redspotted Sunfish	LT	--	--	--	1	June 2015	Habitat identified at the county level only
<i>Mimulus glabratus</i>	Yellow Monkey Flower	LE	--	--	--	1	March 2012	Habitat identified at the county level only
<i>Myotis septentrionalis</i>	Northern Long-eared Myotis	LT	--	--	--	1	May 2002	Habitat identified at the county level only
<i>Myotis sodalis</i>	Indiana Bat	LE	--	--	--	4	May 2011	Habitat identified at the county level only
<i>Notropis chalybaeus</i>	Ironcolor Shiner	LT	--	--	--	1	August 2016	Habitat identified at the county level only
<i>Phalaropus tricolor</i>	Wilson's Phalarope	LE	--	--	--	1	June 2005	Habitat identified at the county level only
<i>Rallus elegans</i>	King Rail	LE	--	--	--	1	June 1905	Habitat identified at the county level only
<i>Sparganium americanum</i>	American Bur-reed	LE	--	--	--	1	August 1977	Habitat identified at the county level only
<i>Trifolium reflexum</i>	Buffalo Clover	LT	--	--	--	1	June 2017	Habitat identified at the county level only
<i>Xanthocephalus xanthocephalus</i>	Yellow-headed Blackbird	LE	--	--	--	1	June 2015	Habitat identified at the county level only

Notes:

List of endangered species obtained from the Illinois Department of Natural Resources (IDNR)

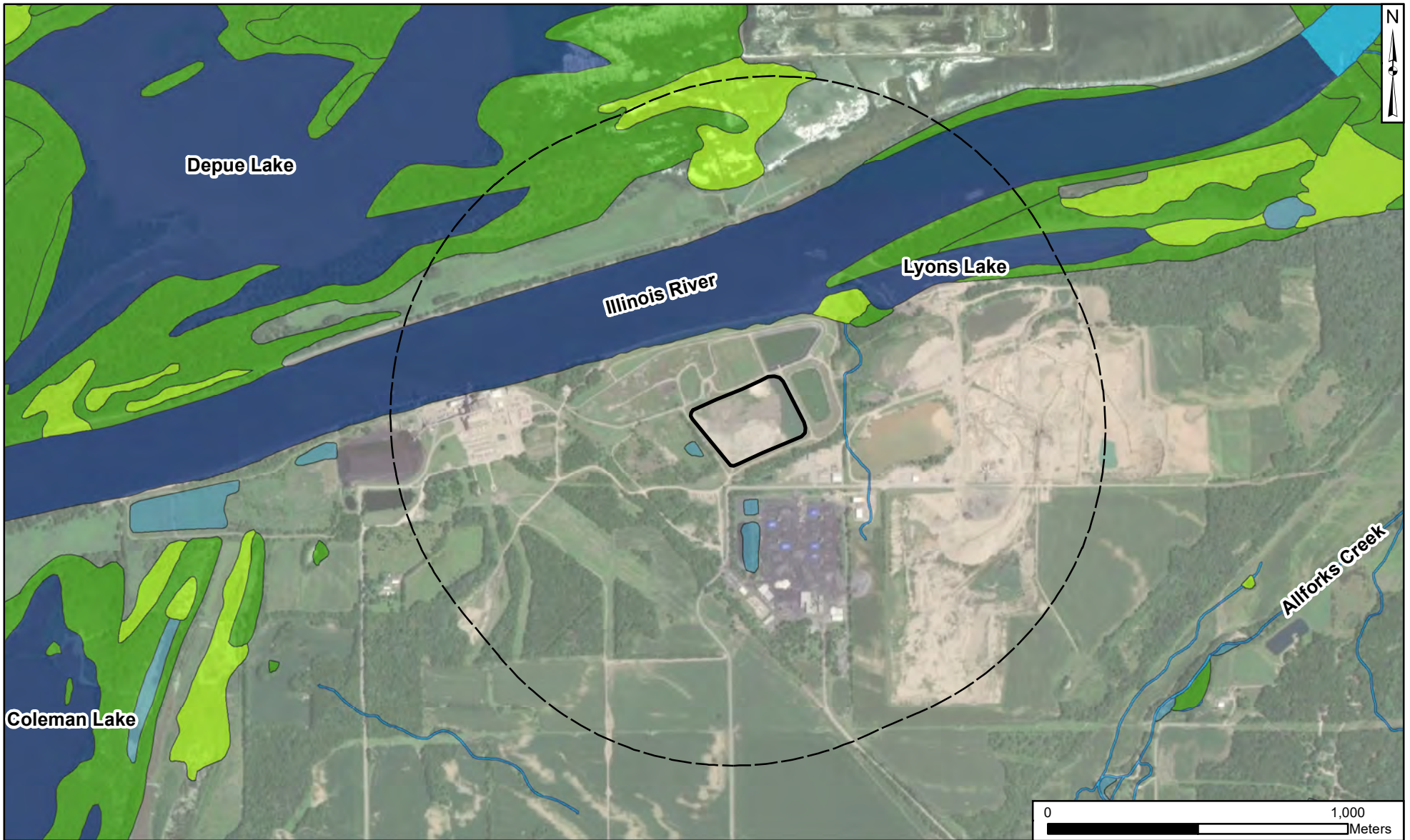
-- = not provided/cannot be determined

m = meter/meters








LE = listed endangered

LT = listed threatened

FIGURES



Legend

 Freshwater Emergent Wetland	 Hennepin East Ash Pond (EAP)
 Freshwater Forested/Shrub Wetland	 Hennepin EAP 1000-meter Buffer
 Freshwater Pond	
 Lake	
 Riverine	

Notes:
 - Wetlands and Surface data were provided by the United States Fish and Wildlife Service (USFWS) Data Mapper and the United States Geologic Survey (USGS) National Hydrography Dataset (NHD).

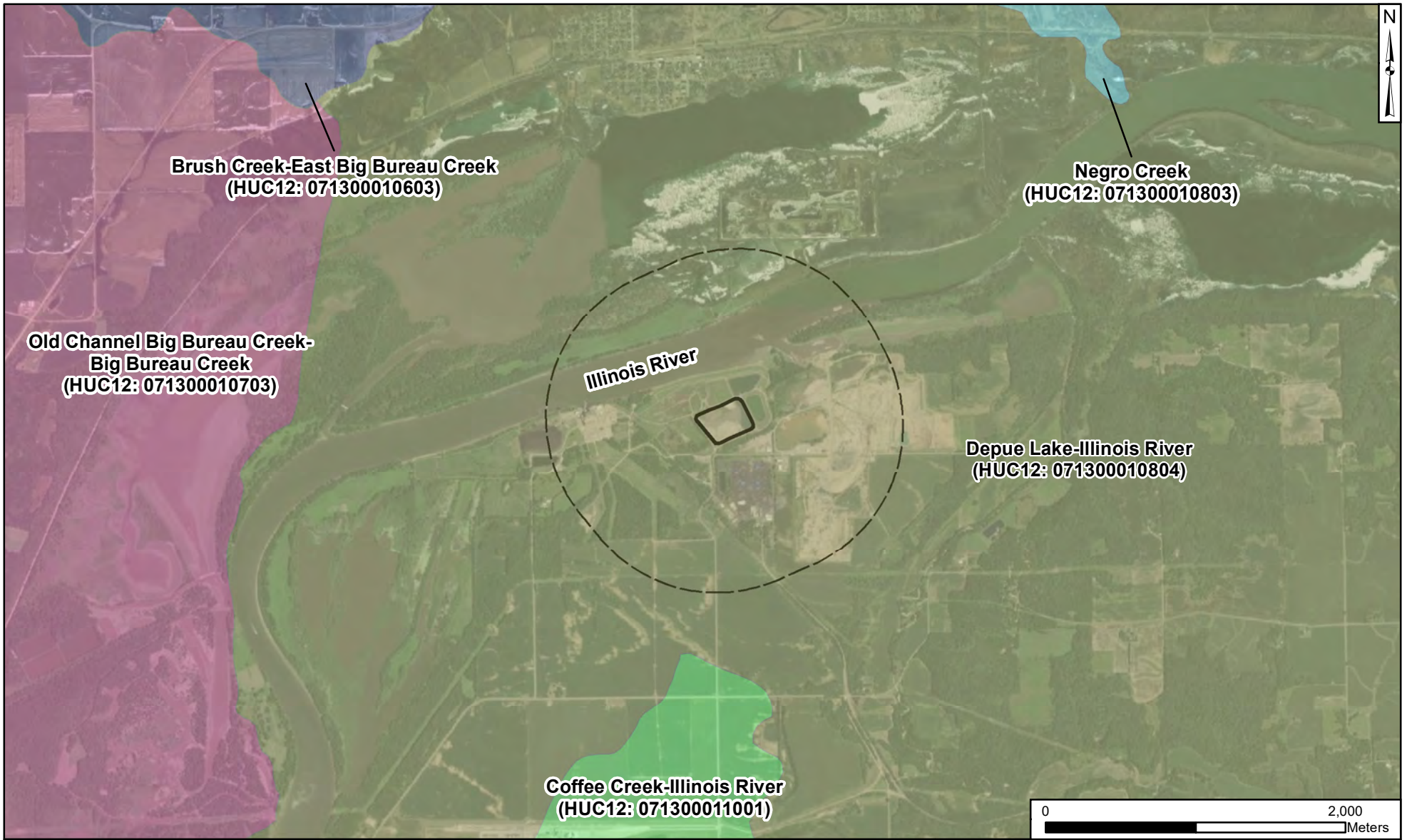
Surface Water and Wetlands within 1,000 meters of the Hennepin East Ash Pond

Hennepin Power Station
Hennepin, Illinois








Geosyntec
consultants

GLP8020	March 2021
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Figure A-1



Legend

 Brush Creek-East Big Bureau Creek	 Hennepin East Ash Pond
 Old Channel Big Bureau Creek-Big Bureau Creek	 Hennepin EAP 1000-meter Buffer
 Coffee Creek-Illinois River	Notes:
 Depue Lake-Illinois River	- Watershed boundary data was obtained from the United States Geologic Survey (USGS) Watershed Boundary Dataset.
 Negro Creek	- HUC 12 = Hydrologic Unit Code 12

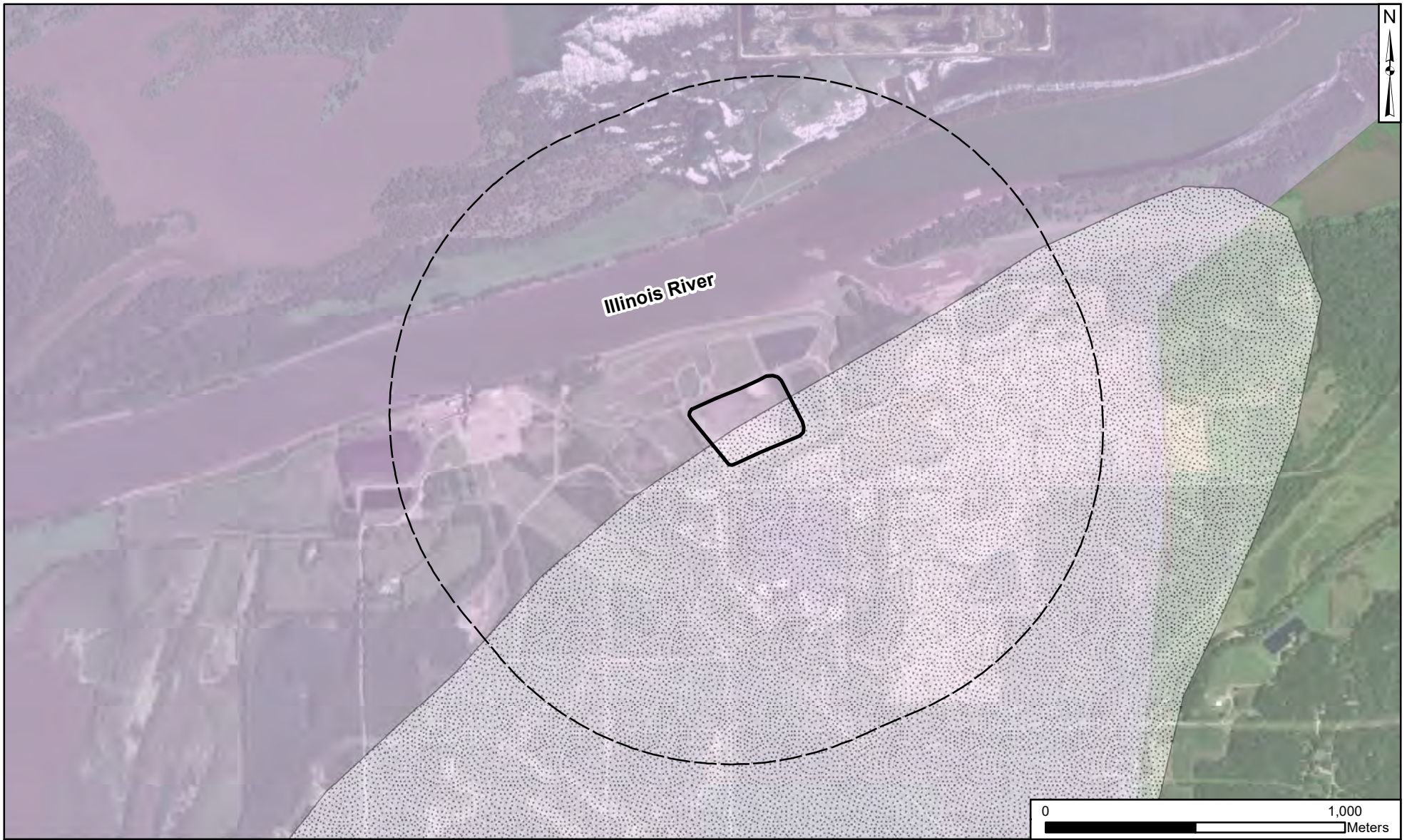
Watersheds within 1,000 meters of the Hennepin East Ash Pond

Hennepin Power Station
Hennepin, Illinois

Geosyntec
consultants

Figure A-2

GLP8020	March 2021
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Legend

- Aquifers of Alluvial and Glacial Origin
- Illinois Major Sand and Gravel Aquifer
- Hennepin EAP 1000-meter Buffer
- Hennepin East Ash Pond (EAP)

Notes:

- Aquifers of Alluvial and Glacial Origin dataset was obtained from the United States Geologic Survey (USGS).
- Illinois Major Sand and Gravel Aquifer dataset was obtained from the Illinois Geological Survey (ISGS).

Aquifers within 1,000 meters of the Hennepin East Ash Pond

Hennepin Power Station
Hennepin, Illinois

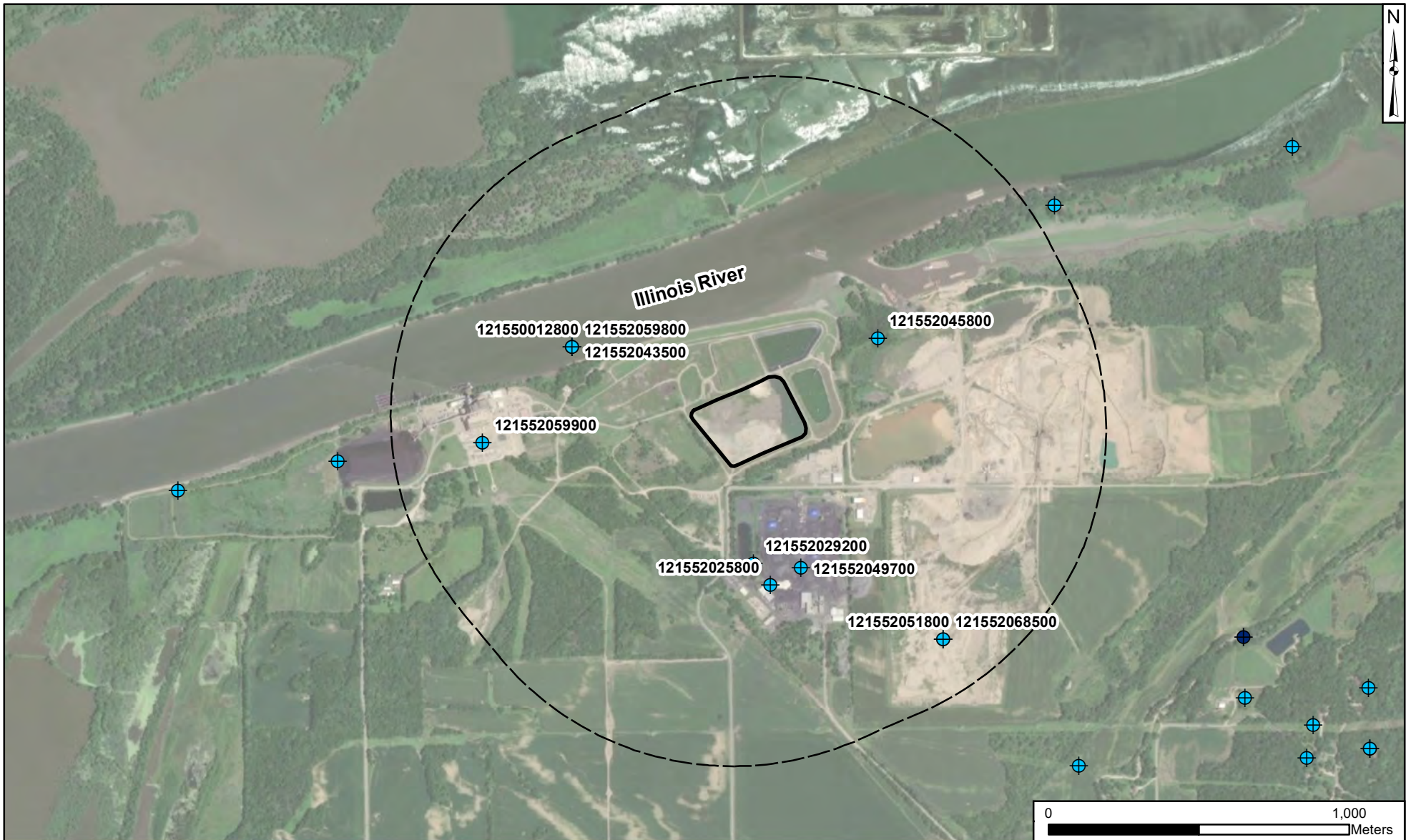
Geosyntec
consultants

Figure





A-3

GLP8020

March 2021



Legend

-  Water Well
-  Water Well, Plugged
-  Hennepin East Ash Pond (EAP)
-  Hennepin EAP 1000-meter Buffer

Notes:

- One group of three wells (121552043500, 121550012800, 121552059800) and one group of two wells (121552051800, 121552068500) are indicated to have the same location coordinates.
- Wells resulting in significant findings are called out.
- Water well data obtained from Illinois Geological Survey (ISGS) Illinois Water and Related Wells (ILWATER) database.
- No Public Water Supply Wells were found within 1,000-meter of the Site.

Water Wells within 1,000 meters of the Hennepin East Ash Pond

Hennepin Power Station
Hennepin, Illinois

Geosyntec
consultants

Figure

A-4

GLP8020

March 2021

ISGS BORING LOGS

Water Well	Top	Bottom
Total Depth Driller's Log filed		113

Permit Date:

Permit #:

COMPANY Layne Western Co., Inc.

FARM Illinois Power

DATE DRILLED September 1, 1968

NO. 5

ELEVATION 0

COUNTY NO. 00128

LOCATION NE NE NW

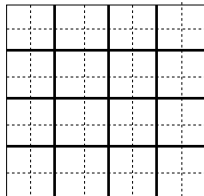
LATITUDE 41.304882

LONGITUDE -89.31122

COUNTY Putnam

API 121550012800

26 - 33N - 2W



Water Well	Top	Bottom
Total Depth Driller's Log filed Sample set # 61999 (0' - 130') Received: June 15, 1979		128

Permit Date:

Permit #:

COMPANY Layne Western Co., Inc.

FARM Esk Corporation

DATE DRILLED July 1, 1978

NO. 2

ELEVATION 0

COUNTY NO. 20258

LOCATION 1590'S line, 890'E line of SE

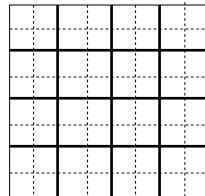
LATITUDE 41.297672

LONGITUDE -89.303448

COUNTY Putnam

API 121552025800

26 - 33N - 2W



ILLINOIS STATE GEOLOGICAL SURVEY

Water Well	Top	Bottom
Total Depth Driller's Log filed Sample set # 61998 (0' - 105') Received: June 15, 1979		109

Permit Date:

Permit #:

COMPANY Layne Western Co., Inc.

FARM Esk Corporation

DATE DRILLED September 1, 1978 NO. 1

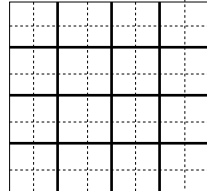
ELEVATION 0 COUNTY NO. 20292

LOCATION 1830'S line, 1070'E line of SE

LATITUDE 41.298332 LONGITUDE -89.304115

COUNTY Putnam

API 121552029200



26 - 33N - 2W

ILLINOIS STATE GEOLOGICAL SURVEY

Noncommunity - Public Water Well	Top	Bottom
SS #68242 (0'-120')	0	0
black topsoil	0	2
brown clay, a little clayey	2	7
yellow-brown coarse gravel & boulders	7	27
brown coarse sand to coarse gravel	27	41
gray & brown soft silty clay	41	43
brn med sand to coarse gravel & boulders	43	50
reddish brown coarse gravel & boulders	50	67
multi-colored boulders	67	73
conglomerate clay & boulders /trace lime	73	82
light gray silty clay	82	84
hard tight coarse gravel	84	86
brn med sand to coarse gravel & boulders	86	96
boulder	96	98
fn brn snd; coarse gravel w/finer layers	98	112
brown fine sand to medium gravel	112	118
firm gray shale	118	125
Total Depth		120
Casing: 36" STEEL from 12' to 62' 18" STEEL 70.59#/FT. from -2' to 90'		
Screen: 25' of 18" diameter .1 slot		
Grout: CONCRETE from 0 to 20.		
Water from sand & gravel at 90' to 115'.		
Static level 17' below casing top which is 3' above GL		
Pumping level 31' when pumping at 1086 gpm for 8 hours		
Permanent pump installed at 50'		

Permit Date: August 31, 1993

Permit #:

COMPANY Buffington, G.

FARM Illinois Power Co.

DATE DRILLED September 30, 1993

NO. 1A/5

ELEVATION 0

COUNTY NO. 20435

LOCATION NE NE NW

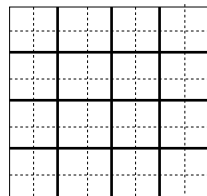
LATITUDE 41.304882

LONGITUDE -89.31122

COUNTY Putnam

API 121552043500

26 - 33N - 2W



on October 31, 1993, with a capacity of 500 gpm
Sample set # 68242 (10' - 120') Received: July 14, 1994

Owner Address: P.O. Box #188 Hennepin, IL
Location source: Location from permit

Buffington, G.

Illinois Power Co 1A/5

COUNTY Putnam

API 121552043500 26 - 33N - 2W

ILLINOIS STATE GEOLOGICAL SURVEY

Semi-Private Water Well	Top	Bottom
yellow rocky sand & gravel	0	75
very fine Sankoty sand	75	114
blue shale at	114	114
Total Depth		114
Casing: 6" BLACK STEEL from 3' to 109'		
Screen: 4' of 6" diameter 10 slot		
Grout: BENTONITE from 0 to 90.		
Size hole below casing: 6"		
Water from Sankoty at 109' to 113'.		
Static level 75' below casing top which is 1' above GL		
Pumping level 105' when pumping at 10 gpm for 2 hours		
Permanent pump installed at 112'		
on June 29, 1995, with a capacity of 10 gpm		
Owner Address: W. Railroad Ave. Princeton, IL		
Address of well: R.R. #1		
Hennepin, IL		
Location source: Location from permit		

Permit Date: May 31, 1995

Permit #:

COMPANY Lutes, George W.

FARM Advanced Asphalt Co.

DATE DRILLED June 12, 1995

NO.

ELEVATION 0

COUNTY NO. 20458

LOCATION SW NW NW

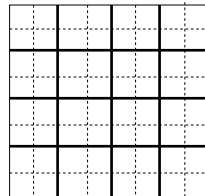
LATITUDE 41.30505

LONGITUDE -89.299075

COUNTY Putnam

API 121552045800

25 - 33N - 2W



ILLINOIS STATE GEOLOGICAL SURVEY

Noncommunity - Public Water Well	Top	Bottom
SS #68792 (0-120')	0	0
fine brown sand	0	4
gray clay	4	5
coarse sand & gravel with boulders	5	79
brown clay with gravel	79	81
fine sand with gravel	81	117
gray shale	117	124
Total Depth		124
Casing: 12" STEEL .375" from 0' to 102'		
Screen: 15' of 12" diameter .13 slot		
Grout: CEMENT from 0 to 20.		
Size hole below casing: 38"		
Water from sand & gravel at 102' to 117'.		
Remarks: for factory		
Sample set # 68792 (0' - 120') Received: March 6, 2000		
Owner Address: Box #200 A Hennepin, IL		
Location source: Location from permit		

Permit Date: September 5, 1996

Permit #: 155-011

COMPANY Buffington, G.

FARM Exolon - ESK Company

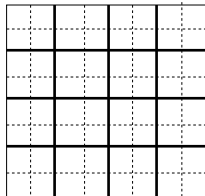
DATE DRILLED October 17, 1996 NO. 3

ELEVATION 0 COUNTY NO. 20497

LOCATION 1775'N 550'W SE/c

LATITUDE 41.298186 LONGITUDE -89.302211

COUNTY Putnam API 121552049700 26 - 33N - 2W



ILLINOIS STATE GEOLOGICAL SURVEY

Private Water Well	Top	Bottom
dirty sand	0	8
gravel	8	18
clay	18	36
yellow gravel (a lot of water loss)	36	50
gray gravel (a lot of water loss)	50	72
shale at	72	72
Total Depth		72
Casing: 4" PVC SCH 40 from -1' to 51'		
Screen: 4' of 4" diameter 15 slot		
Grout: BENT GROUT MIX from 0 to 46.		
Water from sand & gravel at 0' to 0'.		
Static level 18' below casing top which is 1' above GL		
Pumping level 0' when pumping at 50 gpm for 3 hours		
Owner Address: 27W 161 80th St. Naperville, IL		
Address of well: R.R. #1 Hennepin, IL		
Location source: Location from permit		

Permit Date: August 3, 1999

Permit #:

COMPANY Jet Hall

FARM Brown, Kenneth

DATE DRILLED August 25, 1999

NO.

ELEVATION 0

COUNTY NO. 20518

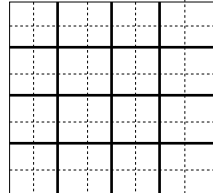
LOCATION NE SW SW

LATITUDE 41.296001

LONGITUDE -89.296594

COUNTY Putnam

API 121552051800



25 - 33N - 2W

Water Well	Top	Bottom
<p>Total Depth Sample set # 56227 (65' - 114') Received: May 16, 1969</p>		<p>114</p>

Permit Date:

Permit #:

COMPANY Layne-Western Drlg

FARM Il. Power Co.

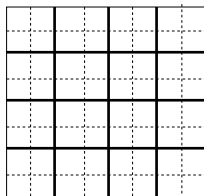
DATE DRILLED NO. 4

ELEVATION OGL COUNTY NO. 20598

LOCATION NE NE NW

LATITUDE 41.304882 LONGITUDE -89.31122

COUNTY Putnam API 121552059800 26 - 33N - 2W



Water Well	Top	Bottom
<p>Total Depth Sample set # 20941 (0' - 115') Received: January 1, 1950</p>		<p>115</p>

Permit Date:

Permit #:

COMPANY Layne-Western Drlg

FARM Il. Power Co. Test

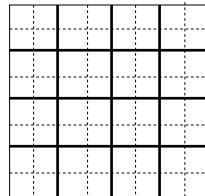
DATE DRILLED NO. 9

ELEVATION OGL **COUNTY NO.** 20599

LOCATION NW

LATITUDE 41.302031 **LONGITUDE** -89.314826

COUNTY Putnam **API** 121552059900 **26 - 33N - 2W**



Private Water Well	Top	Bottom
sandy brown clay	0	12
gravel	12	20
pinkish gray clay	20	28
yellow gravel (lots of water loss)	28	50
fine sand	50	64
Total Depth		64
Casing: 6" PVC from 0' to 42'		
6" SS SCREEN 18/20 SLOT from 42' to 50'		
Screen: 8' of 6" diameter slot		
Grout: BENT CLAY SLRY from 0 to 40.		
Grout: MUSCATINE #1 from 40 to 50.		
Water from sand & gravel at 28' to 64'.		
Static level 5' below casing top which is 1' above GL		
Pumping level 7' when pumping at 12 gpm for 2 hours		
Remarks: pond fill		
Owner Address: R.R. 1 Box 204 Hennepin, IL		
Address of well: same as above		
Location source: Location from permit		

Permit Date: October 4, 2002

Permit #:

COMPANY Jet Hall/Lutes H2o Well Drlg.

FARM Brown, Kenneth

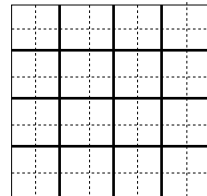
DATE DRILLED November 15, 2002 NO.

ELEVATION 0 COUNTY NO. 20685

LOCATION NE SW SW

LATITUDE 41.296001 LONGITUDE -89.296594

COUNTY Putnam API 121552068500



25 - 33N - 2W

**APPENDIX F
FEMA FLOOD HAZARD MAP**

NOTES TO USERS

This map is for use in administering the National Flood Insurance Program. It does not necessarily identify all areas subject to flooding, particularly from local drainage sources of small size. The community map repository should be consulted for possible updated or additional flood hazard information.

To obtain more detailed information in areas where **Base Flood Elevations (BFEs)** and/or **floodways** have been determined, users are encouraged to consult the Flood Profiles and Floodway Data and/or Summary of Stillwater Elevations tables contained within the Flood Insurance Study (FIS) report that accompanies this FIRM. Users should be aware that BFEs shown on the FIRM represent rounded whole-foot elevations. These BFEs are intended for flood insurance rating purposes only and should not be used as the sole source of flood elevation information. Accordingly, flood elevation data presented in the FIS report should be utilized in conjunction with the FIRM for purposes of construction and/or flood plain management.

Coastal Base Flood Elevations shown on this map apply only landward of 0.0' North American Vertical Datum of 1988 (NAVD 88). Users of this FIRM should be aware that coastal flood elevations are also provided in the Summary of Stillwater Elevations table in the Flood Insurance Study report for this jurisdiction. Elevations shown in the Summary of Stillwater Elevations table should be used for construction and/or flood plain management purposes when they are higher than the elevations shown on this FIRM.

Boundaries of the **floodways** were computed at cross sections and interpolated between cross sections. The floodways were based on hydraulic considerations with regard to requirements of the National Flood Insurance Program. Floodway widths and other pertinent floodway data are provided in the Flood Insurance Study report for this jurisdiction.

In the State of Illinois, any portion of a stream or watercourse that lies within the floodway fringe of a studied (AE) stream may have a state regulated floodway. The FIRM may not depict these state regulated floodways.

Floodways restricted by anthropogenic features such as bridges and culverts are drawn to reflect natural conditions and may not agree with the model computed widths listed in the Floodway Data table in the Flood Insurance Study report.

Multiple **topographic sources** may have been used in the delineation of Special Flood Hazard Areas. See Flood Insurance Study report for details on source resolution and geographic extent.

Certain areas not in Special Flood Hazard Areas may be protected by **flood control structures**. Refer to Section 2.4 "Flood Protection Measures" of the Flood Insurance Study report for information on flood control structures for this jurisdiction.

The projection used in the preparation of this map was Universal Transverse Mercator (UTM) zone 16. The horizontal datum was NAD 83, GRS80 spheroid. Differences in datum, spheroid, projection or UTM zones used in the production of FIRM for adjacent jurisdictions may result in slight positional differences in map features across jurisdiction boundaries. These differences do not affect the accuracy of this FIRM.

Flood elevations on this map are referenced to the North American Vertical Datum of 1988. These flood elevations must be compared to structure and ground elevations referenced to the same vertical datum. For information regarding conversion between the National Geodetic Vertical Datum of 1929 and the North American Vertical Datum of 1988, visit the National Geodetic Survey website at www.ngs.noaa.gov or contact the National Geodetic Survey at the following address:

NGS Information Services, NOAA, NNGS12
National Geodetic Survey SSMC-3, #9202
1315 East-West Highway
Silver Spring, Maryland 20910-3282
(301) 713-3242

To obtain current elevation, description, and/or location for **bench marks** shown on this map, please contact the Information Services Branch of the National Geodetic Survey at (301) 713-3242, or visit its website at www.ngs.noaa.gov.

Base map information shown on this FIRM was provided in digital format by the United States Geological Survey. Digital orthorectified imagery with a spatial resolution of 0.5 meter ground sample distance were photogrammetrically compiled from aerial photography acquired during the leaf-off period of spring 2005.

This map reflects more detailed and up-to-date **stream channel configurations** than those shown on the previous FIRM for this jurisdiction. The Special Flood Hazard Areas and floodways that were transferred from the previous FIRM may have been adjusted to conform to these new stream channel configurations. As a result, the Flood Profiles and Floodway Data tables in the Flood Insurance Study report (which contains authoritative hydraulic data) may reflect stream channel distances that differ from what is shown on this map.

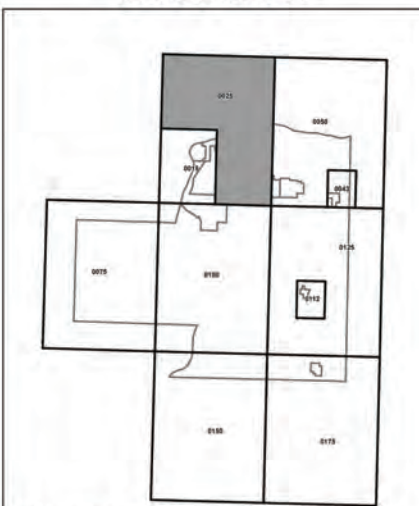
Corporate limits shown on this map are based on the best data available at the time of publication. Because changes due to annexations or de-annexations may have occurred after this map was published, map users should contact appropriate community officials to verify current corporate limit locations.

Please refer to the separately printed **Map Index** for an overview map of the county showing the layout of map panels; community map repository addresses; and a Listing of Communities table containing National Flood Insurance Program dates for each community as well as a listing of the panels on which each community is located.

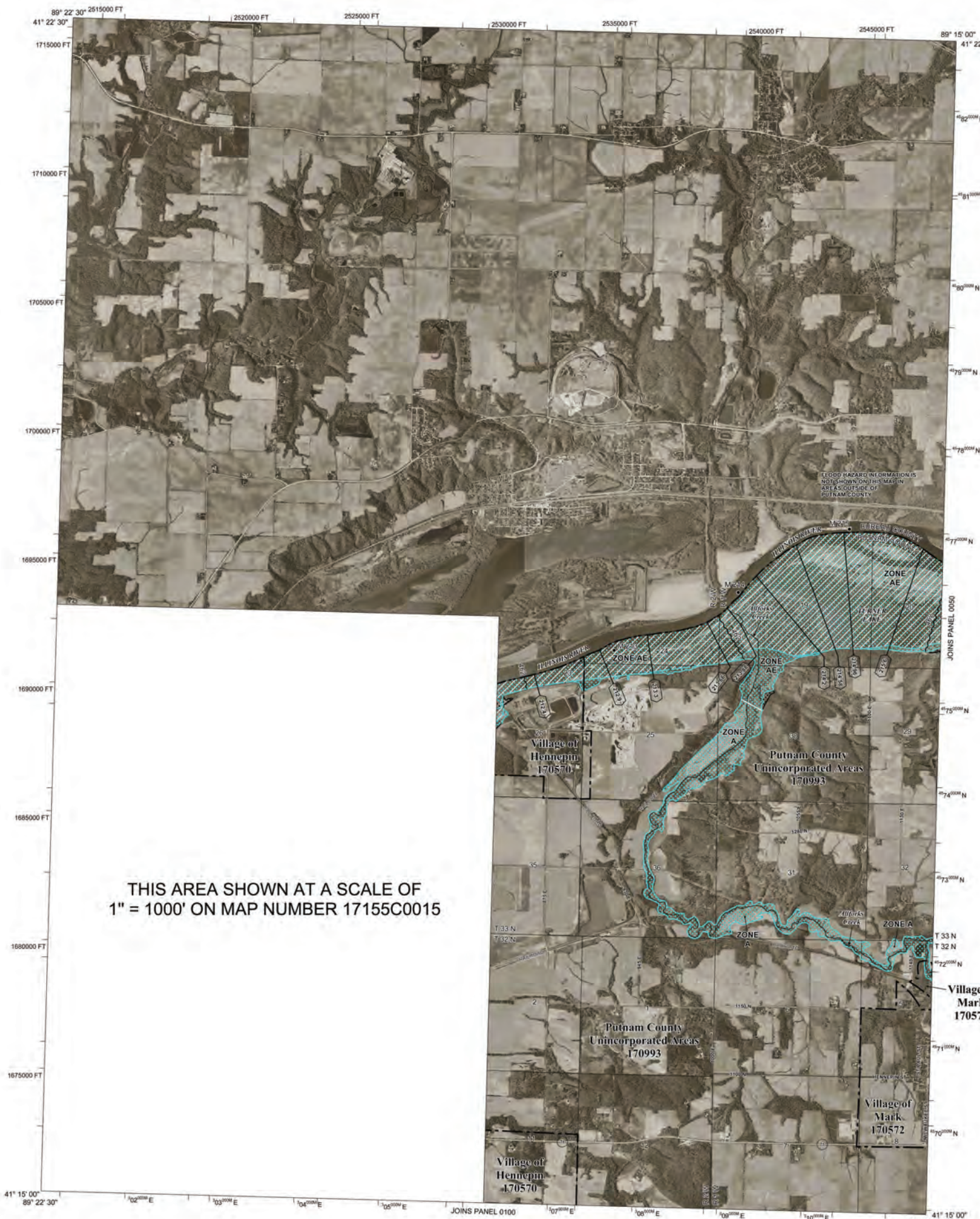
For information on available products associated with this FIRM visit the Map Service Center (MSC) website at <http://floods.fema.gov>. Available products may include previously issued Letters of Map Change, a Flood Insurance Study Report, and/or digital versions of this map. Many of these products can be ordered or obtained directly from the MSC website.

If you have **questions about this map**, how to order products or the National Flood Insurance Program in general, please call the **FEMA Map Information Exchange (FMIX)** at 1-877-FEMA-MAP (1-877-336-6627) or visit the FEMA website at <http://www.fema.gov/business/info>.

PANEL INDEX



Panel Not Printed



LEGEND

SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

The 1% annual chance flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

- ZONE A** No Base Flood Elevations determined.
- ZONE AE** Base Flood Elevations determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
- ZONE AO** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
- ZONE AR** Special Flood Hazard Areas formerly protected from the 1% annual chance flood by a flood control system that was subsequently decommissioned. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.
- ZONE A99** Area to be protected from 1% annual chance flood by a Federal flood protection system under construction; no Base Flood Elevations determined.
- ZONE V** Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations determined.
- ZONE VE** Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined.

FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachments so that the 1% annual chance flood can be carried without substantial increases in flood heights.

OTHER FLOOD AREAS

ZONE X Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

OTHER AREAS

ZONE X Areas determined to be outside the 0.2% annual chance floodplain.

ZONE D Areas in which flood hazards are undetermined, but possible.

COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS

OTHERWISE PROTECTED AREAS (OPAs)

CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas.

- 1% annual chance floodplain boundary
- 0.2% annual chance floodplain boundary
- Floodway boundary
- Zone D boundary
- Zone X boundary
- CBRS and OPA boundary
- Boundary dividing Special Flood Hazard Areas of different Base Flood Elevations, flood depths or flood velocities.
- Base Flood Elevation line and value; elevation in feet*
- Base Flood Elevation value where uniform within zone; elevation in feet*

*Referenced to the North American Vertical Datum of 1988

- A — A — Cross section line
- 25 — 25 — Transect line
- 45° 02' 08" 93° 02' 12" Geographic coordinates referenced to the North American Datum of 1983 (NAD 83)
- 1000-meter Universal Transverse Mercator grid values, zone 16
- 1565000 FT 5000-foot grid tick; Illinois State Plane West Coordinate System, 3801 zone (FIPSZONE 1202) Transverse Mercator
- BM9516; Bench mark (see explanation in Notes to Users section of this FIRM panel)
- M.S. River Mile

MAP REPOSITORIES Refer to Map Repositories list on Map Index

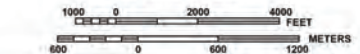
EFFECTIVE DATE OF COUNTYWIDE FLOOD INSURANCE RATE MAP FEBRUARY 4, 2011

EFFECTIVE DATE(S) OF REVISION(S) TO THIS PANEL

For community map revision history prior to countywide mapping, refer to the Community Map History table located in the Flood Insurance Study report for this jurisdiction.

To determine if flood insurance is available in this community, contact your insurance agent or call the National Flood Insurance Program at 1-800-438-6620.

MAP SCALE 1" = 2000'



NATIONAL FLOOD INSURANCE PROGRAM

PANEL 0025E

FIRM FLOOD INSURANCE RATE MAP PUTNAM COUNTY, ILLINOIS AND INCORPORATED AREAS

PANEL 25 OF 175
(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS	COMMUNITY	NUMBER	PANEL	SUFFIX
	HENNEPIN VILLAGE OF	170570	0025	E
	MARK VILLAGE OF	170572	0025	E
	PUTNAM COUNTY	170993	0025	E

Notes to User: The Map Number shown below should be used when placing map orders. The Community Number shown above should be used on insurance applications for the subject community.

MAP NUMBER 17155C0025E

EFFECTIVE DATE FEBRUARY 4, 2011

Federal Emergency Management Agency

ATTACHMENT I

Intended for
Dynegy Midwest Generation, LLC

Date
October 25, 2021

Project No.
1940100806-005

GROUNDWATER MONITORING PLAN

EAST ASH POND HENNEPIN POWER PLANT HENNEPIN, ILLINOIS

GROUNDWATER MONITORING PLAN EAST ASH POND

Project Name **Hennepin Power Plant East Ash Pond**
Project No. **1940100806-005**
Recipient **Dynegy Midwest Generation, LLC**
Document Type **Groundwater Monitoring Plan**
Revision **FINAL**
Date **October 25, 2021**

Ramboll
234 W. Florida Street
Fifth Floor
Milwaukee, WI 53204
USA


T 414-837-3607
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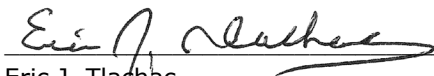


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LICENSED PROFESSIONAL CERTIFICATIONS

35 I.A.C. § 845.630 Groundwater Monitoring Systems (PE)

I, Eric J. Tlachac, a qualified professional engineer in good standing in the State of Illinois, certify that the groundwater monitoring system described in this document (Groundwater Monitoring Plan, Hennepin Power Plant East Ash Pond), has been designed and constructed to meet the requirements of 35 I.A.C. § 845.630. The monitoring system was developed based on information included in the Hydrogeologic Site Characterization Report (Ramboll 2021; included in the Operating Permit to which this Groundwater Monitoring Plan is attached).



Eric J. Tlachac
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Date: October 25, 2021



35 I.A.C. § 845.630 Groundwater Monitoring Systems (PG)

I, Brian G. Hennings, a qualified professional geologist in good standing in the State of Illinois, certify that the groundwater monitoring system described in this document (Groundwater Monitoring Plan, Hennepin Power Plant East Ash Pond), has been designed and constructed to meet the requirements of 35 I.A.C. § 845.630. The monitoring system was developed based on information included in the Hydrogeologic Site Characterization Report (Ramboll 2021; included in the Operating Permit to which this Groundwater Monitoring Plan is attached).



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CONTENTS

Licensed Professional Certifications	2
1. Introduction	6
1.1 Overview	6
1.2 Site Location and Background	6
1.3 Conceptual Model	7
2. Groundwater Monitoring Systems	8
2.1 Existing Monitoring Well Network and Analysis	8
2.1.1 40 C.F.R. § 257 Monitoring Program	8
2.1.2 Part 845 Well Installation and Monitoring	9
2.2 Proposed Part 845 Monitoring Well Network	10
2.3 Well Abandonment	11
3. Applicable Groundwater Quality Standards	12
3.1 Groundwater Classification	12
3.2 Statistical Evaluation of Background Groundwater Data	12
3.3 Applicable Groundwater Protection Standards	12
4. Groundwater Monitoring Plan	14
4.1 Monitoring Networks and Parameters	14
4.1.1 40 C.F.R. § 257 Groundwater Monitoring	14
4.1.2 Part 845 Groundwater Monitoring	14
4.2 Sampling Schedule	15
4.3 Groundwater Sample Collection	16
4.4 Laboratory Analysis	16
4.5 Quality Assurance Program	16
4.6 Groundwater Monitoring System Maintenance Plan	17
4.7 Statistical Analysis	17
4.8 Data Reporting	17
4.9 Compliance with Applicable On-site Groundwater Protection Standards	18
4.10 Alternate Source Demonstrations	18
4.11 Assessment of Corrective Measures and Corrective Action	18
5. References	20

TABLES (IN TEXT)

Table A	40 C.F.R. § 257 Groundwater Monitoring Program Parameters
Table B	Part 845 Groundwater Monitoring Program Parameters
Table C	Proposed Part 845 Monitoring Well Network
Table D	Part 845 Groundwater Monitoring Program Parameters
Table E	Part 845 Sampling Schedule

TABLES (ATTACHED)

Table 1-1	Part 845 Requirements Checklist
Table 2-1	Monitoring Well Locations and Construction Details
Table 3-1	Background Groundwater Quality and Standards
Table 4-1	Sampling and Analysis Summary
Table 4-2	Detection and Reporting Limits for Part 845 Parameters

FIGURES (ATTACHED)

Figure 1-1	Site Location Map
Figure 1-2	Site Map
Figure 1-3	Uppermost Aquifer Groundwater Elevation Contours, February 24-26, 2021
Figure 1-4	Uppermost Aquifer Groundwater Elevation Contours, April 7, 2021
Figure 2-1	Proposed Part 845 Groundwater Monitoring Well Network

APPENDICES

Appendix A	Statistical Analysis Plan
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ACRONYMS AND ABBREVIATIONS

§	Section
35 I.A.C.	Title 35 of the Illinois Administrative Code
40 C.F.R.	Title 40 of the Code of Federal Regulations
AP2	Ash Pond No. 2
AP4	Ash Pond No. 4
ASD	Alternate Source Demonstration
bgs	below ground surface
CCR	coal combustion residuals
CCWL	Coal Combustion Waste Landfill
cm/s	centimeters per second
CSM	conceptual site model
DMG	Dynegy Midwest Generation, LLC
EAP	East Ash Pond
EAPS	East Ash Pond System, includes CCWL, EAP, AP2, and AP4
GMP	Groundwater Monitoring Plan
GWPS	groundwater protection standard
HCR	Hydrogeologic Site Characterization Report
HPP	Hennepin Power Plant
ID	identification
IEPA	Illinois Environmental Protection Agency
IFR	Initial Facility Report
MW	megawatts
NAVD88	North American Vertical Datum of 1988
NID	National Inventory of Dams
No.	number
NRT	Natural Resource Technology, Inc.
Part 845	Residuals in Surface Impoundments: Title 35 of the Illinois Administrative Code § 845
PMP	potential migration pathway
QA/QC	quality assurance/quality control
Ramboll	Ramboll Americas Engineering Solutions, Inc.
RL	reporting limit
SI	surface impoundment
Site	Hennepin EAP
STMI	Science & Technology Management, Inc.
TDS	total dissolved solids
USEPA	United States Environmental Protection Agency

1. INTRODUCTION

1.1 Overview

In accordance with requirements of the Standards for the Disposal of Coal Combustion Residuals (CCR) in Surface Impoundments (SIs): Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845 (Part 845) (Illinois Environmental Protection Agency [IEPA], April 15, 2021), Ramboll Americas Engineering Solutions, Inc. (Ramboll) has prepared this Groundwater Monitoring Plan (GMP) on behalf of Hennepin Power Plant (HPP) (**Figure 1-1**), operated by Dynegy Midwest Generation, LLC (DMG). This report will apply specifically to the CCR Unit referred to as the East Ash Pond (EAP) (Vistra identification [ID] Number [No.] 803, IEPA ID No. W1550100002-05, and National Inventory of Dams [NID] No. IL50363). The EAP is a lined 21-acre CCR SI used to manage CCR and non-CCR waste streams at the HPP. This GMP includes Part 845 content requirements specific to 35 I.A.C. § 845.630 (Groundwater Monitoring System), 35 I.A.C. § 845.640 (Groundwater Sampling and Analysis), and 35 I.A.C. § 845.650 (Groundwater Monitoring Program) for the EAP at HPP.

A checklist which identifies the specific requirements of 35 I.A.C. § 845.630, 35 I.A.C. § 845.640, and 35 I.A.C. § 845.650 is included in **Table 1-1**. The table provides references to sections, tables, and figures included in this document to locate the information that meets specific requirements of 35 I.A.C. § 845.630, 35 I.A.C. § 845.640, and 35 I.A.C. § 845.650.

1.2 Site Location and Background

The EAP is located in northcentral Illinois in Putnam County, approximately four miles northeast of the Village of Hennepin, located within the northeast quarter of Section 26, Township 33 North, Range 2 West (**Figure 1-1**). The HPP is an approximately 504-acre property consisting of 19 parcels, including a retired coal-fired power plant, CCR landfill and SIs, and farmland. The HPP ceased operations in 2019 when the power plant was retired.

The HPP construction history includes construction of Unit 1 in 1953 and Unit 2 in 1959 with capacities of 70 megawatts (MW) and 210 MW, respectively. The plant initially burned high-sulfur Illinois coal and switched to sub-bituminous Powder River Basin coal in 1999 (Science and Technology Management, Inc. [STMI], 1996).

The three CCR Units located adjacent to, or in the vicinity of, each other in the eastern portion of the HPP are referred to as the East Ash Pond System (EAPS). The CCR Units associated with the EAPS are situated south and adjacent to the Illinois River. The area is also bounded to the east and south by industrial properties owned by Tri-Con Materials and Washington Mills, respectively (**Figure 1-2**). The HPP provides the western boundary for the CCR Units with agricultural land to the southwest. Additionally, a 9-acre parcel between the HPP property and Washington Mills (south of the CCR Units) was previously occupied by American Asphalt but operations are no longer active, and the property contains several abandoned buildings. The current owner of this parcel is listed as Tri-Con Materials.

Figure 1-2 depicts the location of the CCR Units and non-CCR Units within the EAPS. The four Hennepin EAPS CCR units consist of the following: one existing landfill (Coal Combustion Waste Landfill [CCWL; Vistra ID No. 801]), one existing SI (EAP), and two IEPA-approved, closed SIs (Ash Pond No. 2 [AP2; Vistra ID No. 802, IEPA ID No. W1550100002-04, and NID No. IL50663] and Ash Pond No. 4 [AP4; Vistra ID No. 805 and IEPA ID No. W1550100002-07]). Information

regarding the CCWL, AP2, and AP4 CCR Units is solely for background information, as this report applies specifically to the EAP CCR Unit, which will hereinafter be referred to as the Site.

1.3 Conceptual Model

Significant site investigation has been completed at the HPP to characterize the geology, hydrogeology, and groundwater quality. Based on extensive investigation and monitoring, the EAP has been well characterized and detailed in the Hydrogeologic Site Characterization Report (HCR; included in the Operating Permit to which this Plan is attached). A conceptual site model (CSM) has been developed and is discussed below.

The Site is characterized by two hydrostratigraphic units:

- **Uppermost Aquifer:** Includes the unlithified natural geologic materials of the Cahokia Alluvium and Henry Formation extending from the upper saturated zone to the bedrock. This unit was encountered in all borings advanced at the EAP in 2021 and is identified as the potential migration pathway (PMP).
- **Bedrock Confining Unit:** Comprised of shales with thin limestone, sandstone, and coal beds. This bedrock confining unit is encountered at the EAP at elevations ranging from 399.2 to 410.2 feet North American Vertical Datum of 1988 (NAVD88).

In the vicinity of the EAP groundwater generally flows from the south beneath the EAP toward the Illinois River (**Figure 1-3**) through the uppermost aquifer which is the primary pathway for contaminant migration. Periodic and temporary flow reversals are possible during periods of high river elevations or flooding (**Figure 1-4**). Vertical migration is limited by the underlying Pennsylvanian-age shale bedrock unit which acts as a confining layer. No PMPs have been identified outside of the uppermost aquifer.

Part 845 parameters were monitored in the uppermost aquifer monitoring wells at the EAP as part of the Title 40 of the Code of Federal Regulations (40 C.F.R.) § 257 monitoring program beginning in 2015. These data were supplemented with sampling of additional locations in 2021. The results indicate that the following parameters were detected at concentrations greater than the applicable 35 I.A.C. § 845.600 groundwater protection standards (GWPSs) and are considered potential exceedances:

- Chloride – at background uppermost aquifer wells 08 and 08D;
- Cobalt – at background uppermost aquifer wells 07, 08, and 08D; at uppermost aquifer compliance well 53; and at bedrock confining unit compliance well 55;
- Lithium – at bedrock confining unit compliance well 55 in April 2021;
- pH – at background uppermost aquifer wells 07, 08, and 08D;
- Thallium – at background uppermost aquifer well 08; and at compliance uppermost aquifer well 52; and
- Total Dissolved Solids (TDS) – at background uppermost aquifer wells 08 and 08D.

Concentration results for the above parameters were compared directly to the GWPS, without an evaluation of background concentrations. Evaluation of background groundwater quality has been completed as part of this GMP, and compliance with Part 845 will be determined following the first round of groundwater sampling. The first round of groundwater sampling for compliance will be completed the quarter following issuance of the Operating Permit and in accordance with this GMP.

2. GROUNDWATER MONITORING SYSTEMS

2.1 Existing Monitoring Well Network and Analysis

Several monitoring programs are being conducted as required by the IEPA and the United States Environmental Protection Agency (USEPA) to evaluate the CCR Units associated with the HPP EAPS and the CCWL. The networks have changed over time and many of the wells and parameters overlap as a result of previously approved GMPs and permits which were developed to focus on specific (and separate) units at the EAPS. The monitoring networks for each of the CCR and non-CCR Units at the EAPS include:

- CCWL
 - Initial Facility Report (IFR) (Section 28)
 - 40 C.F.R. § 257
- AP2 and AP4
 - 40 C.F.R. § 257 for AP2 (AP4 was classified as capped or otherwise maintained and not subject to 40 C.F.R. § 257)
 - IEPA Closure Plan (2019 GMP included in Closure and Post-Closure Care Plan for the Hennepin AP2) and proposed network for Part 845
- EAPS (also includes Leachate Pond and Polishing Pond)
 - IEPA Water Pollution Control Permit 2019-EO-64097 – Special Condition No. 4
- EAP (subject of this GMP)
 - 40 C.F.R. § 257
 - Proposed network for Part 845

This GMP is being provided to propose a groundwater monitoring network and monitoring program specific to the EAP that will comply with Part 845. Monitoring networks and programs that apply to other units are not discussed in this GMP. Those programs will continue to be performed as specified in IEPA approvals. Upon approval of the Operating Permit applications (and by extension the GMPs) for AP2 and AP4 and the EAP, the IEPA Water Pollution Control Permit 2019-EO-64097 Special Condition No. 4 will be discontinued following approval of a future permit modification submittal and will be replaced by the proposed Part 845 monitoring program. The remaining discussion in this document will include only the networks and monitoring programs that are applicable and specific to the EAP, specifically the 40 C.F.R. § 257 network and the proposed Part 845 monitoring network.

2.1.1 40 C.F.R. § 257 Monitoring Program

The 40 C.F.R. § 257 well network for the EAP consists of seven monitoring wells installed nearby or adjacent to the EAP within the uppermost aquifer. The EAP 40 C.F.R. § 257 well network consists of three background monitoring wells (07, 08, and 08D) and four compliance monitoring wells (12, 13, 46, and 47). Monitoring wells 16 and 17 are being considered as additional background wells to represent groundwater quality impacts from off-site, upgradient sources. The boring logs, well construction forms, and other related monitoring well forms are available in the Operating Records as required by 40 C.F.R. § 257.91 for each monitored CCR Unit or CCR

Multi-Unit, and are included in Appendix A of the HCR (included in the Operating Permit to which this Plan is attached).

Assessment monitoring in accordance with 40 C.F.R. § 257.95 was initiated on April 9, 2018. Details on the procedures and techniques used to fulfill the groundwater sampling and analysis program requirements are found in the Sampling and Analysis Plan for the EAP (Natural Resource Technology, Inc. [NRT], 2017).

Groundwater samples are collected semiannually and analyzed for the following laboratory and field parameters from Appendix III and Appendix IV of 40 C.F.R. § 257, summarized in **Table A** below.

Table A. 40 C.F.R. § 257 Groundwater Monitoring Program Parameters

Field Parameters¹			
Groundwater Elevation	pH		
Appendix III Parameters (Total, except TDS)			
Boron	Chloride	Sulfate	
Calcium	Fluoride	TDS	
Appendix IV Parameters (Total)			
Antimony	Cadmium	Lead	Selenium
Arsenic	Chromium	Lithium	Thallium
Barium	Cobalt	Mercury	Radium 226 and 228 combined
Beryllium	Fluoride	Molybdenum	

¹Dissolved oxygen, temperature, specific conductance, oxidation/reduction potential, and turbidity are recorded during sample collection.

Results and analysis of groundwater sampling are reported annually by January 31 of the following year and made available on the CCR public website as required by 40 C.F.R. § 257.

2.1.2 Part 845 Well Installation and Monitoring

In 2021, four additional monitoring wells (52, 53, 54, and 55) were installed along the perimeter of the EAP to assess the vertical and horizontal lithology, stratigraphy, chemical properties, and physical properties of geologic layers to a minimum of 100 feet below ground surface (bgs) as specified in 35 I.A.C. § 845.620(b). Additionally, three leachate monitoring wells (XPW01, XPW02, and XPW03) were installed within the EAP to characterize the CCR materials.

Prospective Part 845 monitoring wells were sampled for eight rounds from February to August 2021 and the results were assessed for selection of the EAP Part 845 monitoring well network. Groundwater samples were collected and analyzed for 35 I.A.C. § 845.600 parameters as summarized in **Table B** below.

Table B. Part 845 Groundwater Monitoring Program Parameters

Field Parameters¹			
Groundwater Elevation	pH	Turbidity	
Metals (Total)			
Antimony	Boron	Cobalt	Molybdenum
Arsenic	Cadmium	Lead	Selenium
Barium	Calcium	Lithium	Thallium
Beryllium	Chromium	Mercury	
Inorganics (Total)			
Fluoride	Sulfate	Chloride	TDS
Other (Total)			
Radium 226 and 228 combined			

¹ Dissolved oxygen, temperature, specific conductance, and oxidation/reduction potential were recorded during sample collection.

Data and results from the Part 845 background monitoring were included in the water quality discussion included in the HCR (included in the Operating Permit to which this Plan is attached). The data collected from background locations during the Part 845 monitoring were used to evaluate and calculate background concentrations for the EAP. The evaluation and discussion are included in **Section 3.2** of this report.

Data collected from the 40 C.F.R. § 257 monitoring network from 2015 to 2021, and from the Part 845 background monitoring were used for selection of the Part 845 monitoring well network proposed in **Section 2.2**.

2.2 Proposed Part 845 Monitoring Well Network

The groundwater monitoring network proposed in this plan will include 11 monitoring wells screened in the uppermost aquifer (07, 08, 08D, 12, 13, 16, 17, 46, 47, 52, and 54) and two temporary water level only surface water staff gages (XSG01 and SG02). The proposed network is summarized in **Table C** below and displayed on **Figure 2-1**. Eleven wells (five background and six compliance) will be used to monitor groundwater concentrations within the uppermost aquifer.

The groundwater samples collected from the 11 wells will be used to monitor and evaluate groundwater quality and demonstrate compliance with the groundwater quality standards listed in 35 I.A.C. § 845.600(a). The proposed monitoring wells will yield groundwater samples that represent the quality of downgradient groundwater at the CCR boundary (as required in 35 I.A.C. § 845.630(a)(2)). Monitoring well depths and construction details are listed in **Table 2-1** and summarized in **Table C** below.

Table C. Proposed Part 845 Monitoring Well Network

Well ID	Monitored Unit	Well Screen Interval (feet bgs)	Well Type ¹
07	UA	67.5 – 77.5	Background
08	UA	51.5 – 61.5	Background
08D	UA	83.0 – 88.0	Background
12	UA	49.5 – 59.5	Compliance
13	UA	67.0 – 69.0	Compliance
16	UA	56.0 – 66.0	Background
17	UA	58.1 – 68.1	Background
46	UA	50.0 – 60.0	Compliance
47	UA	50.0 – 60.0	Compliance
52	UA	51.0 – 61.0	Compliance
54	UA	65.0 – 75.0	Compliance
XSG01^{2,3}	CCR	NA	WLO
SG02^{2,3}	Surface Water	NA	WLO

¹ Well type refers to the role of the well in the monitoring network.

² Surface water level measuring points

³ Location is temporary pending implementation of impoundment closure per an approved Construction Permit Application.

NA = not applicable

UA = uppermost aquifer

WLO = water level only

2.3 Well Abandonment

No wells are currently proposed for abandonment.

3. APPLICABLE GROUNDWATER QUALITY STANDARDS

3.1 Groundwater Classification

Groundwater at the EAP meets the definition of Class I – Potable Resource Groundwater (35 I.A.C. § 620.210), based on the following criteria:

- Groundwater in the uppermost aquifer extends ten feet or more below the land surface; and
- Field hydraulic conductivity tests from wells screened within the uppermost aquifer resulted in an overall (geometric mean) horizontal hydraulic conductivity of 8.4×10^{-2} centimeters per second (cm/s), which exceeds the 1×10^{-4} cm/s criterion.

3.2 Statistical Evaluation of Background Groundwater Data

A Statistical Analysis Plan (**Appendix A**) has been developed to describe procedures that will be used to establish background conditions and implement compliance monitoring as necessary and required by 35 I.A.C. § 845.640 and 35 I.A.C. § 845.650. The Statistical Analysis Plan was prepared in accordance with the requirements of 35 I.A.C. § 845.640(f), with reference to the acceptable statistical procedures provided in USEPA's *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance (Unified Guidance, March 2009)*, and is intended to provide a logical process and framework for conducting the statistical analysis of the data obtained during groundwater monitoring.

In accordance with 35 I.A.C. § 845.640(f)(1), the statistical method chosen for analysis of background groundwater quality was either the tolerance interval or the prediction interval procedure for each constituent listed in 35 I.A.C. § 845.600(a)(1) at this CCR unit per 35 I.A.C. § 845.640(f)(1)(C). A comparison of the statistical background concentrations and groundwater quality standards listed in 35 I.A.C. § 845.600(a)(1) and the resulting GWPSs are summarized in **Table 3-1**.

3.3 Applicable Groundwater Protection Standards

The applicable GWPSs will be established in accordance with 35 I.A.C. § 845.600(a) (greater of the background concentration or numerical limit specified in 35 I.A.C. § 845.600(a)(1)). The results of the statistical analysis of background groundwater data (**Table 3-1**) indicate that most background concentrations in the uppermost aquifer are less than the groundwater quality standards listed in 35 I.A.C. § 845.600(a)(1). Therefore, for these parameters, the groundwater quality standards listed in 35 I.A.C. § 845.600(a)(1) will be applied to the results from the proposed groundwater monitoring network. The exceptions include chloride, cobalt, and TDS, where the background concentration is greater than the 35 I.A.C. § 845.600(a)(1) standard. In these instances, the GWPS will be the background concentration.

Under most circumstances, the GWPS will be compared to the lower confidence limit for the observed concentrations for each constituent in each compliance well. Exceptions are when there are high percentages (greater than 50 percent) of non-detects in compliance well data, for which a future mean (for 50 to 70 percent non-detects) or median (for greater than 70 percent non-detects) will be compared to the GWPS. Consistent with the *Unified Guidance*, the same general statistical method of confidence interval testing against a fixed GWPS is recommended in compliance and corrective action programs. Confidence intervals provide a flexible and statistically accurate method to test how a parameter estimated from a single sample compares

to a fixed numerical limit. Confidence intervals explicitly account for variation and uncertainty in the sample data used to construct them.

Evaluation of the applicable standards will occur in conjunction with the analysis of groundwater quality results. Background calculations and the resulting concentrations may be updated as appropriate, in accordance with the Statistical Analysis Plan included in **Appendix A**.

4. GROUNDWATER MONITORING PLAN

The GMP will monitor and evaluate groundwater quality to demonstrate compliance with the groundwater quality standards included in 40 C.F.R. § 257.94(e), 40 C.F.R. § 257.95(h), and 35 I.A.C. § 845.600(a). The groundwater monitoring program will include sampling and analysis procedures that are consistent and that provide an accurate representation of groundwater quality at the background and downgradient wells as required by 35 I.A.C. § 845.630. As discussed in **Section 2**, two monitoring programs specific to the EAP exist, the 40 C.F.R. § 257 monitoring program and the proposed Part 845 monitoring program. These networks will continue to be monitored until USEPA approves Part 845. It is expected that upon USEPA approval of Part 845, the 40 C.F.R. § 257 monitoring program and reporting will be eliminated, and the proposed Part 845 monitoring and reporting included in this Plan will continue until requirements of Part 845 have been achieved. Upon approval of the Operating Permit applications (and by extension the GMPs) for AP2 and AP4 and the EAP, the IEPA Water Pollution Control Permit 2019-EO-64097 Special Condition No. 4 will be discontinued following approval of a future permit modification submittal and will be replaced by the proposed Part 845 monitoring program.

4.1 Monitoring Networks and Parameters

4.1.1 40 C.F.R. § 257 Groundwater Monitoring

The existing 40 C.F.R. § 257 monitoring program was discussed in detail in **Section 2.1.1**. Seven wells (three background and four compliance) are sampled for Appendix III and Appendix IV parameters on a semi-annual frequency. Monitoring wells 16 and 17 are being considered as additional background wells to represent groundwater quality impacts from off-site, upgradient sources. Well locations and parameters will continue to be monitored and reported as required by 40 C.F.R. § 257 until USEPA approves Part 845.

4.1.2 Part 845 Groundwater Monitoring

The proposed Part 845 Monitoring Network will consist of five background monitoring wells (07, 08, 08D, 16, and 17), six compliance monitoring wells (12, 13, 46, 47, 52, and 54), and two temporary water level only staff gages (XSG01 and SG02) to monitor potential impacts from the EAP (**Figure 2-1**). These monitoring wells are screened within the uppermost aquifer along the perimeter of the EAP. Groundwater samples will be collected and analyzed for the following laboratory and field parameters in **Table D** below.

Table D. Part 845 Groundwater Monitoring Program Parameters

Field Parameters¹			
Groundwater Elevation	pH	Turbidity	
Metals (Total)			
Antimony	Boron	Cobalt	Molybdenum
Arsenic	Cadmium	Lead	Selenium
Barium	Calcium	Lithium	Thallium
Beryllium	Chromium	Mercury	
Inorganics (Total)			
Fluoride	Sulfate	Chloride	TDS
Other (Total)			
Radium 226 and 228 combined			

¹ Dissolved oxygen, temperature, specific conductance, and oxidation/reduction potential will be recorded during sample collection.

All parameters listed above were sampled a minimum of eight times by October 18, 2021 to establish background groundwater quality in accordance with 35 I.A.C. § 845.650 (b)(1)(A). Discussion of background groundwater quality is included in **Section 3.2**.

4.2 Sampling Schedule

Groundwater sampling for the Part 845 monitoring well network will initially be performed quarterly according to the following schedule:

Table E. Part 845 Sampling Schedule

Frequency	Duration
Monthly (groundwater elevations only)	Begins: the quarter following approval of this plan and issuance of the Operating Permit.
	Ends: Following the 30-year post closure care period and following IEPA approval of documentation that groundwater concentrations are below standards in 35 I.A.C. § 845.600 and concentrations exceeding background are not increasing and meet requirements in 35 I.A.C. § 845.780 (c)(2)(B)(i) and (ii).
Quarterly (groundwater quality)	Begins: the quarter following approval of this plan and issuance of the Operating Permit.
	Ends: Following the 30-year post closure care period and following IEPA approval of documentation that groundwater concentrations are below standards in 35 I.A.C. § 845.600 and concentrations exceeding background are not increasing and meet requirements in 35 I.A.C. § 845.780 (c)(2)(B)(i) and (ii), or upon IEPA approval of an alternate schedule as allowed by 35 I.A.C. § 845.650(b)(4).
Semi-annual (groundwater quality)	Begins: Following 5 years of quarterly groundwater monitoring and IEPA approval of a demonstration that groundwater concentrations are below standards in 35 I.A.C. § 845.600 and not exhibiting statistically-significant increasing trends, monitoring effectiveness is not compromised by a semi-annual schedule, and sufficient data has been collected to characterize groundwater.
	Ends: Following detection of a statistically-significant increasing trend in groundwater concentrations or an exceedance of the standards in 35 I.A.C. § 845.600 (quarterly monitoring shall be resumed in these circumstances), or following the 30-year post closure care period and following IEPA approval of documentation that groundwater concentrations

	are below standards in 35 I.A.C. § 845.600 and concentrations exceeding background are not increasing and meet requirements in 35 I.A.C. § 845.780 (c)(2)(B)(i) and (ii).
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4.3 Groundwater Sample Collection

Groundwater sampling procedures have been developed and the collection of groundwater samples is being implemented to meet the requirements of 35 I.A.C. § 845.640. In addition to groundwater well samples, quality assurance samples will be collected as described in **Section 4.5 (Table 4-1)**.

4.4 Laboratory Analysis

Laboratory analysis will be performed consistent with the requirements of 35 I.A.C. § 845.640(j) by a state-certified laboratory using methods approved by IEPA and USEPA. Laboratory methods may be modified based on laboratory equipment availability or procedures, but the Reporting Limit (RL) for all parameters analyzed, regardless of method, will be lower than the applicable groundwater quality standard. RLs for the applicable parameters are summarized in **Table 4-2**. Concentrations lower than the RL will be reported as less than the RL.

4.5 Quality Assurance Program

Consistent with the requirements of 35 I.A.C. § 845.640(a)(5), the sampling and analysis program includes procedures and techniques for quality assurance/quality control (QA/QC). Additional quality assurance samples to be collected will include the following:

- Field duplicates will be collected at a frequency of one per group of ten or fewer investigative water samples.
- One equipment blank sample will be collected and analyzed for each day of sampling. If dedicated sampling equipment is used, then equipment blank samples will not be collected.

The duplicate and equipment blank quality assurance samples will be supplemented by the laboratory QA/QC program, which typically includes:

- Regular generation of instrument calibration curves to assure instrument reliability
- Laboratory control samples and/or quality control check standards that have been spiked, and analyses to monitor the performance of the analytical method
- Matrix spike/matrix spike duplicate analyses to determine percent recoveries and relative percent differences for each of the parameters detected
- Analysis of replicate samples to check the precision of the instrumentation and/or methodology employed for all analytical methods
- Analysis of method blanks to assure that the system is free of contamination

Water quality meters used to measure pH and turbidity will be calibrated according to manufacturer's specifications. At a minimum, it is recommended that calibration of pH occur daily prior to sampling and checked for accuracy at the end of each day. Unusual or suspect pH measurements during sampling events will be flagged, evaluated, and additional calibration may be performed throughout the sampling events. Turbidity meters will be checked daily, prior to

and following sampling. Unusual measurements or erratic meter performance will be flagged and evaluated for overall effects on the data prior to reporting.

4.6 Groundwater Monitoring System Maintenance Plan

Consistent with the requirements of 35 I.A.C. § 845.630(e)(2), maintenance will be performed as needed to assure that the monitoring wells provide representative groundwater samples. Monitoring wells will be inspected during each groundwater sampling event; inspections will consist of the following:

- Visual inspection, clearing of vegetation, replacement of markers, and painting of protective casings as needed to assure that monitoring wells are clearly marked and accessible
- Visual inspection and repair or replacement of well aprons as needed to assure that they are intact, drain water away from the well, and have not heaved
- Visual inspection and repair or replacement of protective casings as needed to assure that they are undamaged, and that locks are present and functional
- Checks to assure that well caps are intact and vented, unless in flood-prone areas in which case caps will not be vented
- Annual measurement of monitoring well depths to determine the degree of siltation within the wells. Wells will be redeveloped as needed to remove siltation from the screened interval if it impedes flow of water into the well
- Checks to assure that wells are clear of internal obstructions, and flow freely

If maintenance of a monitoring well cannot address an identified deficiency, a replacement well will be installed.

4.7 Statistical Analysis

Statistical analysis will be consistent with procedures listed in 35 I.A.C. § 845.640(f). A Statistical Analysis Plan, provided in **Appendix A**, has been developed to summarize the statistical procedures that will be used to evaluate the groundwater results.

4.8 Data Reporting

Data reporting for the 40 C.F.R. § 257 monitoring well network will be consistent with recordkeeping, notification, and internet posting requirements described in 40 C.F.R. § 257.105 through 257.107.

Groundwater monitoring and analysis completed in accordance with the Part 845 monitoring under an approved monitoring program will be reported to IEPA within 60 days after completion of sampling and the data placed in the facility's operating record as required by 35 I.A.C. § 845.610(b)(3)(D). Within 14 days of posting to the operating record, information will be posted to the publicly accessible internet site "Illinois CCR Rule Compliance Data and Information" as required by 35 I.A.C. § 845.810(d). Information will also be submitted to IEPA annually by January 31 as required by 35 I.A.C. § 845.550, for data collected the preceding year. The report will include the status of the groundwater monitoring and any required corrective action plan for the EAP in addition to other requirements detailed in 35 I.A.C. § 845.610(e).

4.9 Compliance with Applicable On-site Groundwater Protection Standards

In accordance with 35 I.A.C. § 845.600(a)(1), the groundwater protection standard at the waste boundary will be the higher of either the 35 I.A.C. § 845.600 standard or the concentration determined by background groundwater monitoring.

As provided in 35 I.A.C. § 845.780(c)(2), at the end of the 30-year post-closure care period, groundwater monitoring will continue to be conducted in post-closure care until the groundwater results show the concentrations are:

- Below the GWPS in 35 I.A.C. § 845.600; and
- Not increasing for those constituents over background, using the statistical procedures and performance standards in 35 I.A.C. § 845.640(f) and (g), provided that:
 - Concentrations have been reduced to the maximum extent feasible; and
 - Concentrations are protective of human health and the environment.

If one or more constituents are detected and confirmed by an immediate resample, to be greater than the GWPS in any sampling event, an Alternate Source Demonstration (ASD) will be evaluated as described in **Section 4.10**.

4.10 Alternate Source Demonstrations

As allowed in 35 I.A.C. § 845.650(e), following detection of an exceedance of the GWPS, an ASD will be evaluated and, if completed, submitted to IEPA within 60 days. The ASD will provide lines of evidence that a source other than the EAP caused the contamination and the EAP did not contribute to the contamination, or that the exceedance of the GWPS resulted from error in sampling, analysis, statistical evaluation, natural variation in groundwater quality, or a change in the potentiometric surface and groundwater flow direction.

The ASD will include information and analysis that supports the conclusions and a certification of accuracy by a qualified professional engineer. Once the ASD is approved by IEPA, the Part 845 groundwater monitoring will continue as defined in **Section 4.1.2**.

If an ASD is not completed and submitted, or IEPA does not approve the ASD, a notification of the exceedance will be provided to IEPA and placed in the operating record. Additional actions will also be completed as required by 35 I.A.C § 845.650(d)(1) through (3), including initiation of an assessment of corrective measures under 35 I.A.C § 845.660. As allowed in 35 I.A.C § 845.650(e)(7) a petition for review of IEPA's non-concurrence under 35 I.A.C. § 105 may also be filed

4.11 Assessment of Corrective Measures and Corrective Action

As described in 35 I.A.C. § 845.660, if the ASD summarized in **Section 4.10** has not been approved by IEPA, an assessment of corrective measures will be initiated within 90 days of the detection of a result exceeding 35 I.A.C. § 845.600 standards (*i.e.*, receipt of laboratory data). The assessment of corrective measures will include at least the following (35 I.A.C. § 845.660(c)):

- The performance, reliability, ease of implementation, and potential impacts of appropriate potential remedies, including safety impacts, cross-media impacts, and control of exposure to any residual contamination;

- The time required to begin and complete the corrective action plan; and
- The institutional requirements, such as State or local permit requirements or other environmental or public health requirements that may substantially affect implementation of the corrective action plan.

Within one year of completing the assessment of corrective measures, a corrective action plan will be developed to identify the selected remedy in accordance with 35 I.A.C. § 845.670. If closure of the CCR Unit is required, a closure alternatives analysis will be completed as specified in 35 I.A.C. § 845.710. The analysis and selected alternative will be submitted to IEPA in a Closure Plan as specified by 35 I.A.C. § 845.720. Groundwater monitoring proposed in this Addendum will continue as specified until the post closure care period has expired and IEPA has approved termination of post-closure care.

5. REFERENCES

- Illinois Environmental Protection Agency, 2021. *Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments: Title 35 of the Illinois Administrative Code § 845*. April 15, 2021.
- Natural Resource Technology, Inc. (NRT), 2017. *Sampling and Analysis Plan. Hennepin East Ash Pond Hennepin Power Station. Hennepin, IL*. October 17, 2017.
- Ramboll Americas Engineering Solutions, Inc. (Ramboll), 2021. *Hydrogeologic Site Characterization Report. Hennepin East Ash Pond. Hennepin Power Plant. Hennepin, Illinois*.
- Science and Technology Management, Inc. (STMI), 1996. *Investigation of Site Closure Options at Illinois Power Company's Hennepin East Ash Impoundment. Report No. STMI/135/96-02*. Brookfield, Wisconsin. June 1996.
- United States Environmental Protection Agency (USEPA), March 2009. *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities – Unified Guidance*. Office of Resource Conservation and Recovery, Program Implementation and Information Division, United States Environmental Protection Agency, Washington D.C. EPA/530/R-09/007.
- United States Environmental Protection Agency (USEPA), 2015. *Title 40 of the Code of Federal Regulations, Part 257*.

TABLES

TABLE 1-1. PART 845 REQUIREMENTS CHECKLIST

GROUNDWATER MONITORING PLAN

HENNEPIN POWER PLANT

EAST ASH POND

HENNEPIN, ILLINOIS

Part 845 Reference	Part 845 Components	Location of Information in GMP
845.630	Groundwater Monitoring Systems	
845.630(a)(2)	Potential contaminant pathways must be monitored.	Sections 2.1.2, 2.2, & 4.1.2 Table 2-1 Figure 2-1
845.630(a) 845.630(b) 845.630(c)	At least two upgradient wells and four downgradient wells (min. 1 and 3, but requires additional documentation)	Sections 2.1.2, 2.2, & 4.1.2 Table 2-1 Figure 2-1
845.630(a) 845.630(b) 845.630(c)	Downgradient Well Density	Figure 2-1
845.630(a)(2)	Downgradient wells at waste boundary	Figure 2-1
845.640	Groundwater Sampling and Analysis Requirements	
845.640(a)	Consistent sampling and analysis procedures	Section 4 Tables 4-1 & 4-2
845.640(b)	Methods are appropriate	Section 4 Tables 4-1 & 4-2
845.640(c)	Groundwater elevations must be measured in each well prior to purging, each time groundwater is sampled.	Section 4.3
845.640 (d)(e)(f)(g)(h)	Establishment of background and application of statistical methods	Sections 3 & 4.7 Appendix A
845.640(i)	Analyze total recoverable metals	Section 4.1.2
845.640(j)	Analyze groundwater samples using a certified laboratory	Section 4.4

TABLE 1-1. PART 845 REQUIREMENTS CHECKLIST

GROUNDWATER MONITORING PLAN

HENNEPIN POWER PLANT

EAST ASH POND

HENNEPIN, ILLINOIS

Part 845 Reference	Part 845 Components	Location of Information in GMP
845.650	Groundwater Monitoring Program	
845.650(a)	Must include monitoring for all constituents with a groundwater protection standard in Section 845.600(a), calcium, and turbidity	Section 4.1.2
845.650(b)(c)	Groundwater Monitoring Frequency	Sections 4.1.2 & 4.2
845.650(d)(e)	Exceedances of the groundwater protection standard	Sections 4.9, 4.10, & 4.11
845.650(b)(2) and (3)	Staff gauge/ piezometer to monitor head in impoundment	Sections 2.2 & 4.1.2 Figure 2-1 (XSG01)
NA	Staff gauge/ piezometer to monitor head of neighboring surface water body	Sections 2.2 & 4.1.2 Figure 2-1 (SG02)

[O: NRK 08/17/21; U: CJC 09/16/21; C: LDC 09/20/21]

Notes:

GMP = Groundwater Monitoring Plan

NA = Not Applicable

TABLE 2-1. MONITORING WELL LOCATIONS AND CONSTRUCTION DETAILS
GROUNDWATER MONITORING PLAN
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Well Number	Type	HSU	Date Constructed	Top of PVC Elevation (ft)	Measuring Point Elevation (ft)	Measuring Point Description	Ground Elevation (ft)	Screen Top Depth (ft BGS)	Screen Bottom Depth (ft BGS)	Screen Top Elevation (ft)	Screen Bottom Elevation (ft)	Well Depth (ft BGS)	Bottom of Boring Elevation (ft)	Screen Length (ft)	Screen Diameter (inches)	Latitude (Decimal Degrees)	Longitude (Decimal Degrees)
07	B	UA	11/15/1984	518.27	518.27	Top of PVC	515.10	67.50	77.50	447.61	437.61	78.00	437.10	10	2	41.297986	-89.305712
08	B	UA	11/17/1984	501.38	501.38	Top of PVC	498.70	51.50	61.50	447.24	437.24	62.00	436.70	10	2	41.300698	-89.3044
08D	B	UA	04/17/2009	501.34	501.34	Top of PVC	498.80	83.00	88.00	415.79	410.79	90.00	408.80	5	2	41.300799	-89.304522
12	C	UA	03/28/1995	498.44	498.44	Top of PVC	495.16	49.45	59.50	445.71	435.71	60.00	435.20	10	2	41.303663	-89.304304
13	C	UA	03/01/1995	498.47	498.47	Top of PVC	495.38	67.00	69.00	428.38	426.38	75.00	420.40	2	2	41.303658	-89.304315
16	B	UA	03/30/1995	501.74	501.74	Top of PVC	500.30	56.00	66.00	444.28	434.28	68.00	432.30	10	2	41.30168	-89.302861
17	B	UA	03/30/1995	507.13	507.13	Top of PVC	504.80	58.06	68.10	446.77	436.77	68.00	436.80	10	2	41.3022	-89.3006
46	C	UA	08/11/2015	498.75	498.75	Top of PVC	496.44	50.00	60.00	446.44	436.44	60.00	436.40	10	2	41.303953	-89.303472
47	C	UA	08/11/2015	502.65	502.65	Top of PVC	499.07	50.00	60.00	452.13	442.13	60.00	442.10	10	2	41.303301	-89.305994
52	C	UA	02/11/2021	500.93	500.93	Top of PVC	497.70	51.00	61.00	446.74	436.74	60.90	436.80	10	2	41.302466	-89.306369
54	C	UA	02/09/2021	500.30	500.30	Top of PVC	497.10	65.00	75.00	432.14	422.14	74.06	423.10	10	2	41.303439	-89.30522
XSG01	WLO	CCR	--	--	493.49	Staff gauge	--	--	--	--	--	--	--	--	--	41.302583	-89.302249
SG02	WLO	SW	--	--	--	Staff gauge	--	--	--	--	--	--	--	--	--	41.303678	-89.31531

Notes:

All elevation data are presented relative to the North American Vertical Datum 1988 (NAVD88), GEOID 12A
Type refers to the role of the well in the monitoring network: background (B), compliance (C), or water level measurements only (WLO)
WLO wells are temporary pending implementation of impoundment closure per an approved Construction Permit application
-- = data not available
BGS = below ground surface
CCR = Coal Combustion Residual
ft = foot or feet
HSU = Hydrostratigraphic Unit
PVC = polyvinyl chloride
SW = surface water
UA = uppermost aquifer

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TABLE 3-1. BACKGROUND GROUNDWATER QUALITY AND STANDARDS
GROUNDWATER MONITORING PLAN
HENNEPIN POWER PLANT
EAST ASH POND
HENNEPIN, ILLINOIS

Parameter	Background Concentration	845 Limit	Groundwater Protection Standard	Unit
Antimony, total	0.001	0.006	0.006	mg/L
Arsenic, total	0.001	0.010	0.010	mg/L
Barium, total	0.212	2.0	2.0	mg/L
Beryllium, total	0.001	0.004	0.004	mg/L
Boron, total	0.163	2	2	mg/L
Cadmium, total	0.0023	0.005	0.005	mg/L
Chloride, total	435	200	435	mg/L
Chromium, total	0.001	0.1	0.1	mg/L
Cobalt, total	0.038	0.006	0.038	mg/L
Fluoride, total	0.12	4.0	4.0	mg/L
Lead, total	0.0015	0.0075	0.0075	mg/L
Lithium, total	0.019	0.04	0.04	mg/L
Mercury, total	0.0002	0.002	0.002	mg/L
Molybdenum, total	0.0017	0.1	0.1	mg/L
pH (field)	7.5 / 6.6	9.0 / 6.5	9.0 / 6.5	SU
Radium 226 and 228 combined	2	5	5	pCi/L
Selenium, total	0.0014	0.05	0.05	mg/L
Sulfate, total	215	400	400	mg/L
Thallium, total	0.001	0.002	0.002	mg/L
Total Dissolved Solids	1620	1200	1620	mg/L

Notes:

For pH, the values presented are the upper / lower limits
Groundwater protection standards for calcium and turbidity do not apply per 35 I.A.C. § 845.600(b)
mg/L = milligrams per liter
SU = standard units
pCi/L = picocuries per liter

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TABLE 4-1. SAMPLING AND ANALYSIS SUMMARY

GROUNDWATER MONITORING PLAN
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Parameter	Analytical Method ¹	Number of Samples	Field Duplicates ²	Field Blanks ³	Equipment Blanks ³	MS/MSD ⁴	Total	Container Type	Minimum Volume ⁵	Preservation (Cool to 4 °C for all samples)	Sample Hold Time from Collection Date
Metals											
Metals ⁶	6020, Li - EPA 200.7	11	2	0	0	1	14	plastic	600 mL	HNO ₃ to pH<2	6 months
Mercury	7470A or 6020	11	2	0	0	1	14	plastic	400 mL	HNO ₃ to pH<2	28 days
Inorganic Parameters											
Fluoride	9214 or EPA 300	11	2	0	0	1	14	plastic	300 mL	Cool to 4 °C	28 days
Chloride	9251 or EPA 300	11	2	0	0	1	14	plastic	100 mL	Cool to 4 °C	28 days
Sulfate	9036 or EPA 300	11	2	0	0	1	14	plastic	50 mL	Cool to 4 °C	28 days
Total Dissolved Solids	SM 2540 C	11	2	0	0	1	14	plastic	200 mL	Cool to 4 °C	7 days
Radium											
Radium 226	9315 or EPA 903	11	0	0	0	0	11	plastic	1000 mL	HNO ₃ to pH<2	6 months
Radium 228	9320 or EPA 904	11	0	0	0	0	11	plastic	1000 mL	HNO ₃ to pH<2	6 months
Field Parameters											
pH	SM 4500-H+ B	11	NA	NA	NA	NA	11	flow-through cell	NA	none	immediately
Dissolved Oxygen ⁸	SM 4500-O/405.1	11	NA	NA	NA	NA	11	flow-through cell	NA	none	immediately
Temperature ⁸	SM 2550	11	NA	NA	NA	NA	11	flow-through cell	NA	none	immediately
Oxidation/Reduction Potential ⁸	SM 2580 B	11	NA	NA	NA	NA	11	flow-through cell	NA	none	immediately
Specific Conductance ⁸	SM 2510 B	11	NA	NA	NA	NA	11	flow-through cell	NA	none	immediately
Turbidity ⁷	SM 2130 B	11	NA	NA	NA	NA	11	flow-through cell or hand-held turbidity meter	NA	none	immediately

[O: NRK 08/17/21; C: CJC 09/16/21]

Notes:

- ¹ Analytical method numbers are from SW-846 unless otherwise indicated. Analytical methods may be updated with more recent versions as appropriate.
 - ² Field duplicates will be collected at a frequency of one per group of 10 or fewer investigative water samples. Field duplicates will not be collected for radium analysis.
 - ³ Field blanks will be collected at the discretion of the project manager; Equipment blanks will be collected at a rate of 1 per sampling event if non-dedicated equipment is used.
 - ⁴ Matrix Spike/Matrix Spike Duplicate (MS/MSD) samples will be collected at a frequency of one per group of 20 or fewer investigative water samples per CCR unit/multi-unit. Additional volume to be determined by laboratory.
 - ⁵ Sample volume is estimated and will be determined by the laboratory.
 - ⁶ Metals = antimony, arsenic, barium, beryllium, boron, cadmium, calcium, chromium, cobalt, lead, lithium, molybdenum, selenium, thallium. Metals may be analyzed via ICP/ ICP-MS USEPA methods 6010 or 6020 depending on laboratory instrument availability
 - ⁷ If turbidity exceeds 10 NTUs, a duplicate sample filtered through a .45 micron filter may be collected for metals analysis in addition to the unfiltered sample. Both samples would be submitted for analysis.
 - ⁸ Parameter collected for quality assurance and quality control for field sampling purposes only; not required to be collected or reported under Part 845; collection of parameter may be discontinued without notification.
- < = less than
 °C = degrees Celsius
 HNO₃ = nitric acid
 mL = milliliter
 NA = not applicable
 NTU = nephelometric turbidity unit

TABLE 4-2. DETECTION AND REPORTING LIMITS FOR PART 845 PARAMETERS

GROUNDWATER MONITORING PLAN

HENNEPIN POWER PLANT

EAST ASH POND

HENNEPIN, ILLINOIS

Constituent	CAS	Unit	Analytical Methods ¹	USEPA MCL ²	35 I.A.C. § 845.600	RL ^{4, 5}	MDL ⁵
Metals							
Antimony	7440-36-0	mg/L	6020	0.006	0.006	0.003	0.00036
Arsenic	7440-38-2	mg/L	6020	0.01	0.01	0.001	0.00013
Barium	7440-39-3	mg/L	6020	2	2	0.001	0.00028
Beryllium	7440-41-7	mg/L	6020	0.004	0.004	0.001	0.000017
Boron	7440-42-8	mg/L	6020	NS	2	0.01	0.0023
Cadmium	7440-43-9	mg/L	6020	0.005	0.005	0.001	0.000042
Calcium	7440-70-2	mg/L	6020	NS	NS	0.15	0.15
Chromium	7440-47-3	mg/L	6020	0.1	0.1	0.004	0.00027
Cobalt	7440-48-4	mg/L	6020	0.006	0.006	0.002	0.000017
Lead	7439-92-1	mg/L	6020	0.015	0.0075	0.001	0.000025
Lithium	7439-93-2	mg/L	6020 or EPA 200.7	0.04	0.04	0.02	0.0001
Mercury	7439-97-6	mg/L	6020 or 7470A	0.002	0.002	0.0002	0.000078
Molybdenum	7439-98-7	mg/L	6020	0.1	0.1	0.001	0.000063
Selenium	7782-49-2	mg/L	6020	0.05	0.05	0.001	0.00032
Thallium	7440-28-0	mg/L	6020	0.002	0.002	0.001	0.000062
Inorganics							
Fluoride	7681	mg/L	9214 or EPA 300	4	4	0.25	0.065
Chloride	16887-00-6	mg/L	9251 or EPA 300	250 ³	200	1	0.15
Sulfate	18785-72-3	mg/L	9036 or EPA 300	250 ³	400	1	0.24
Total Dissolved Solids	10052	mg/L	SM 2540C	500 ³	1200	17	--
Other							
Radium 226 and 228 combined	7440-14-4	pCi/L	9315/9320 or EPA 903/904	5	5	-- ⁶	-- ⁷
Field							
pH	NA	SU	SM 4500-H+ B	NS	6.5-9.0	NA	NA
Oxidation/Reduction Potential	NA	mV	SM 2580 B	NS	NS	NA	NA
Dissolved Oxygen	NA	mg/L	SM 4500-O/405.1	NS	NS	NA	NA
Temperature	NA	°C	SM 2550	NS	NS	NA	NA
Specific Conductance	NA	µS/cm	SM 2510 B	NS	NS	NA	NA

TABLE 4-2. DETECTION AND REPORTING LIMITS FOR PART 845 PARAMETERS

GROUNDWATER MONITORING PLAN

HENNEPIN POWER PLANT

EAST ASH POND

HENNEPIN, ILLINOIS

Constituent	CAS	Unit	Analytical Methods ¹	USEPA MCL ²	35 I.A.C. § 845.600	RL ^{4, 5}	MDL ⁵
Turbidity	NA	NTU	SM 2130 B	NS	NS	NA	NA

[O: NRK 08/17/21; C: CJC 09/16/21]

Notes:

¹ Analytical method numbers are from SW-846 unless otherwise indicated. Metals will be analyzed via Method 6020 or 6010 depending on laboratory equipment availability. Selected method will ensure reporting limits (RL) are below Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845.600 groundwater protection standards.

² USEPA MCL = United States Environmental Protection Agency Maximum Contaminant Level.

³ USEPA SMCL = United States Environmental Protection Agency Secondary Maximum Contaminant Level.

⁴ RLs will be less than the 35 I.A.C. § 845.600 groundwater protection standards.

⁵ RLs and method detection limits (MDL) will vary depending on the laboratory performing the work.

⁶ All radium results will be reported (values may be positive or negative) and will include uncertainty and the calculated MDC.

⁷ Laboratories calculate a minimum detectable concentration (MDC) based on the sample.

°C = degrees Celsius

µS/cm = microsiemens per centimeter

CAS = Chemical Abstract Number

MDL = Method detection limit as established by the laboratory

mg/L = milligrams per liter

mV = millivolts

NS = No standard

NTU = nephelometric turbidity unit

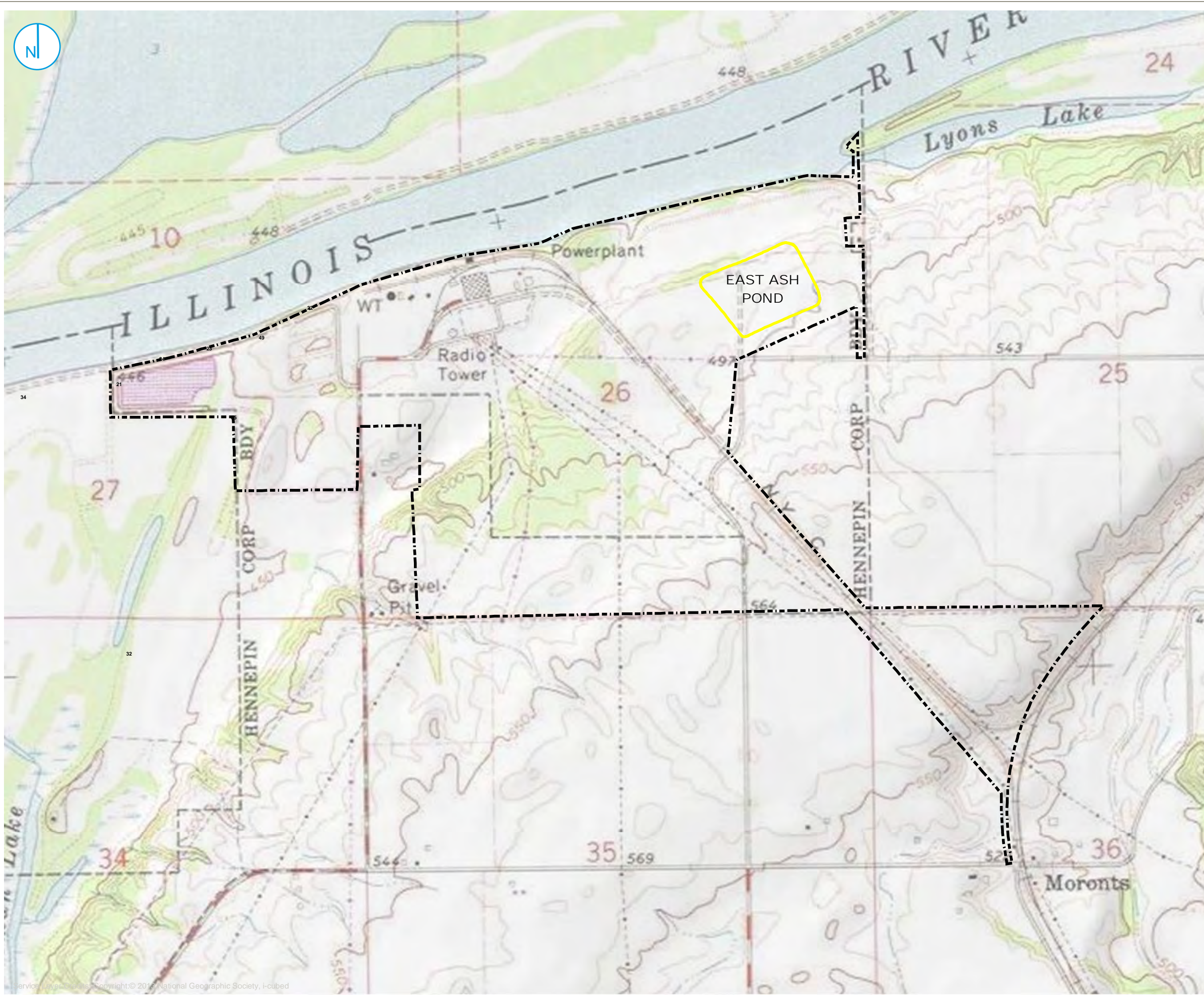
pCi/L = picocuries per liter

RL = Reporting limit as established by the laboratory

SM = Standard Methods for the Examination of Water and Wastewater

SU = Standard Units

FIGURES



- PART 845 REGULATED UNIT (SUBJECT UNIT)
- PROPERTY BOUNDARY







SITE LOCATION MAP

GROUNDWATER MONITORING PLAN
EAST ASH POND
 HENNEPIN POWER PLANT
 HENNEPIN, ILLINOIS

FIGURE 1-1





-  PART 845 REGULATED UNIT (SUBJECT UNIT)
-  SITE FEATURE
-  LIMITS OF FINAL COVER
-  PROPERTY BOUNDARY



SITE MAP

GROUNDWATER MONITORING PLAN
EAST ASH POND
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS

FIGURE 1-2

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.





- BACKGROUND WELL
- MONITORING WELL
- SOURCE SAMPLE LOCATION
- STAFF GAGE
- GROUNDWATER ELEVATION CONTOUR (1-FT CONTOUR INTERVAL, NAVD88)
- INFERRED GROUNDWATER ELEVATION CONTOUR
- GROUNDWATER FLOW DIRECTION
- PART 845 REGULATED UNIT (SUBJECT UNIT)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY

NOTE:
ELEVATIONS IN PARENTHESIS WERE NOT USED FOR CONTOURING.

0 175 350
Feet

**UPPERMOST AQUIFER
GROUNDWATER ELEVATION
CONTOURS
FEBRUARY 24-26, 2021**

**GROUNDWATER MONITORING PLAN
EAST ASH POND
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS**

FIGURE 1-3



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



- BACKGROUND WELL
- MONITORING WELL
- SOURCE SAMPLE LOCATION
- STAFF GAGE
- GROUNDWATER ELEVATION CONTOUR (1-FT CONTOUR INTERVAL, NAVD88)
- INFERRED GROUNDWATER ELEVATION CONTOUR
- GROUNDWATER FLOW DIRECTION
- PART 845 REGULATED UNIT (SUBJECT UNIT)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY

NOTE:
ELEVATIONS IN PARENTHESIS WERE NOT USED FOR CONTOURING.



**UPPERMOST AQUIFER
GROUNDWATER ELEVATION
CONTOURS
APRIL 7, 2021**

**GROUNDWATER MONITORING PLAN
EAST ASH POND
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS**

FIGURE 1-4





- BACKGROUND WELL
- COMPLIANCE WELL
- STAFF GAGE
- PART 845 REGULATED UNIT (SUBJECT UNIT)
- SITE FEATURE
- LIMITS OF FINAL COVER
- PROPERTY BOUNDARY



**PROPOSED PART 845
GROUNDWATER MONITORING
WELL NETWORK**

**GROUNDWATER MONITORING PLAN
EAST ASH POND
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS**

FIGURE 2-1



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**APPENDIX A
STATISTICAL ANALYSIS PLAN**

Prepared for
Dynegy Midwest Generation, LLC

Date
October 25, 2021

Project No.
1940100806-005

STATISTICAL ANALYSIS PLAN

EAST ASH POND HENNEPIN POWER PLANT HENNEPIN, ILLINOIS

STATISTICAL ANALYSIS PLAN HENNEPIN POWER PLANT EAST ASH POND


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LICENSED PROFESSIONAL CERTIFICATIONS

This certification is based on the description of the statistical methods selected to evaluate groundwater as presented in the following Statistical Analysis Plan; Hennepin Power Plant East Ash Pond. The procedures described in the plan will be used to establish background conditions and implement compliance monitoring as necessary and required by 35 I.A.C. § 845.640 and 35 I.A.C. § 845.650. The Statistical Analysis Plan was prepared in accordance with the requirements of 35 I.A.C. § 845.640(f), with reference to the acceptable statistical procedures provided in the United States Environmental Protection Agency (USEPA)'s *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance (Unified Guidance, March 2009)*, and is intended to provide a logical process and framework for conducting the statistical analysis of the data obtained during groundwater monitoring. In accordance with 35 I.A.C. § 845.640(f)(1), the statistical method chosen for analysis of background groundwater quality will be either the tolerance interval or the prediction interval procedure for each constituent listed in 35 I.A.C. § 845.600(a)(1) at this CCR unit per 35 I.A.C. § 845.640(f)(1)(C). Groundwater Protection Standards (GWPS) will be established in accordance with 35 I.A.C. § 845.600(a) (greater of the background concentration or numerical limit specified in 35 I.A.C. § 845.600(a)(1)). The GWPS will be compared to the lower confidence limit for the observed concentrations for each constituent in each compliance well. Consistent with the *Unified Guidance*, the same general statistical method of confidence interval testing against a fixed GWPS is recommended in compliance and corrective action programs. Confidence intervals provide a flexible and statistically accurate method to test how a parameter estimated from a single sample compares to a fixed numerical limit. Confidence intervals explicitly account for variation and uncertainty in the sample data used to construct them.

Description of the statistical methods chosen for analysis of groundwater monitoring data and application of these methods for determining exceedances of the GWPS identified in 35 I.A.C. § 845.600(a) is provided in this Statistical Analysis Plan.

35 I.A.C. § 845.640 Statistical Analysis (PE)

I, Eric J. Tlachac, a qualified professional engineer in good standing in the State of Illinois, certify that the statistical methods summarized above and described in this document (Statistical Analysis Plan; Hennepin Power Plant East Ash Pond) are appropriate for evaluating the groundwater monitoring data collected as described in the attached document and are in substantial compliance with 35 I.A.C. § 845.640.



Eric J. Tlachac
Qualified Professional Engineer
062-063091
Illinois
Date: October 25, 2021



35 I.A.C. § 845.640 Statistical Analysis (PG)

I, Brian G. Hennings, a qualified professional geologist in good standing in the State of Illinois, certify that the statistical methods described in this document (Statistical Analysis Plan; Hennepin Power Plant East Ash Pond) are appropriate for evaluating the groundwater monitoring data collected as described in the attached document and are in substantial compliance with 35 I.A.C. § 845.640.



Brian G. Hennings
Professional Geologist
196.001482
Illinois
Date: October 25, 2021



35 I.A.C. § 845.640 Statistical Analysis

I, Rachel A. Banoff, a qualified professional, certify that the statistical methods described in this document (Statistical Analysis Plan; Hennepin Power Plant East Ash Pond), are appropriate for evaluating the groundwater monitoring data collected as described in the attached document and are in substantial compliance with 35 I.A.C. § 845.640.



Rachel A. Banoff, EIT
Project Statistician
Date: October 25, 2021

CONTENTS

Licensed Professional Certifications	2
1. Introduction	6
1.1 Statistical Analysis Objectives	6
1.2 Statistical Analysis Plan Approach	6
2. Background Monitoring and Data Preparation	8
2.1 Sample Independence	8
2.2 Non-Detect Data Processing	9
2.3 Testing for Normality	9
2.4 Testing for Outliers	9
2.5 Trend Analysis	10
2.6 Spatial Variation	10
2.7 Temporal Variation	10
2.8 Updating Background	11
3. Compliance Monitoring	13
3.1 GWPS Establishment and Exceedance Determination	13
3.1.1 The Upper Tolerance Limit	14
3.1.2 Parametric Confidence Intervals around a Mean	16
3.1.3 Non-Parametric Confidence Intervals around a Median	16
3.1.4 The Upper Prediction Limit for a Future Mean	17
3.1.5 The Non-Parametric Upper Prediction Limit for a Future Median	17
3.1.6 Parametric Linear Regression and Confidence Band	18
3.1.7 Non-Parametric Thiel-Sen Trend Line and Confidence Band	20
3.2 Determination of Statistically Significant Increases over Background	21
4. References	22

TABLES (IN TEXT)

Table A	Statistical Calculations Used in Compliance Monitoring Procedures
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ACRONYMS AND ABBREVIATIONS

§	Section
35 I.A.C.	Title 35 of the Illinois Administrative Code
ANOVA	analysis of variance
CCR	coal combustion residuals
COC	constituents of concern
GWPS	groundwater protection standard
IEPA	Illinois Environmental Protection Agency
LCL	lower confidence limit
LTL	lower tolerance limit
MSE	mean squared error
P	probability
Part 845	Residuals in Surface Impoundments: Title 35 of the Illinois Administrative Code § 845
RCRA	Resource Conservation and Recovery Act
RL	reporting limit
ROS	regression on order statistics
SI	surface impoundment
SSI	statistically significant increase
SWFPR	site-wide false positive rate
<i>Unified Guidance</i>	<i>Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance (USEPA, 2009)</i>
UPL	upper prediction limit
USEPA	United States Environmental Protection Agency
UTL	upper tolerance limit

1. INTRODUCTION

In April 2021, the Illinois Environmental Protection Agency (IEPA) issued a final rule for the regulation and management of Coal Combustion Residuals (CCR) in surface impoundments (SIs) under the Standards for the Disposal of CCR in Surface Impoundments: Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845 (Part 845). Facilities regulated under Part 845 are required to develop and sample a groundwater monitoring well network to evaluate whether impounded CCR materials are impacting downgradient groundwater quality. The groundwater quality evaluation must include selection and certification by a qualified professional engineer of the statistical procedures to be used. The procedures described in the evaluation will be used to establish background conditions and implement compliance and corrective action monitoring as necessary and required by 35 I.A.C. § 845.640 and 35 I.A.C. § 845.650. This Statistical Analysis Plan was prepared in accordance with the requirements of 35 I.A.C. § 845.640(f), with reference to the acceptable statistical procedures provided in United States Environmental Protection Agency's (USEPA's) *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance (Unified Guidance)* (March 2009).

This Statistical Analysis Plan does not include procedures for groundwater sample collection and analysis, as these activities are conducted in accordance with the Sampling and Analysis Plan prepared for each CCR unit in accordance with 35 I.A.C. § 845.640. This Statistical Analysis Plan will be used as the primary reference for evaluating groundwater quality during operation and post-closure care.

1.1 Statistical Analysis Objectives

This Statistical Analysis Plan is intended to provide a logical process and framework for conducting the statistical analyses of data obtained during groundwater monitoring conducted in accordance with the Sampling and Analysis Plan for each CCR unit. The Statistical Analysis Plan will enable a qualified professional engineer to certify that the selected statistical methods are appropriate for evaluating the groundwater monitoring data for the applicable CCR unit(s).

1.2 Statistical Analysis Plan Approach

The main sections of this Statistical Analysis Plan should be viewed as a "generic" outline of statistical methods utilized for each CCR unit and constituent required to be monitored. The statistical analysis of the groundwater monitoring data, however, will be conducted on an individual-constituent or well basis, and may involve the use of appropriate statistical procedures depending on multiple factors such as detection frequency and normality distributions.

The CCR Rule outlines two phases of groundwater monitoring:

- Background Monitoring in accordance with 35 I.A.C. § 845.650(b)(1)
- Compliance Monitoring in accordance with 35 I.A.C. § 845.650

Each phase of the groundwater monitoring program requires specific statistical procedures to accomplish the intended purpose. During the background monitoring phase, background groundwater quality will be established utilizing upgradient and background wells and downgradient groundwater quality data will be collected to facilitate statistics in subsequent phases. Compliance Monitoring is then initiated through the evaluation of the downgradient

groundwater monitoring data for exceedances of the groundwater protection standard (GWPS) established by Part 845 (concentration specified in 35 I.A.C. § 845.600 or an IEPA-approved background concentration). The developed statistical analysis plan will be implemented for each monitoring phase and in accordance with the statistical procedures.

2. BACKGROUND MONITORING AND DATA PREPARATION

The background and compliance monitoring wells were sampled and analyzed for constituents, as listed in Part 845 (antimony, arsenic, barium, beryllium, boron, cadmium, calcium, chloride, chromium, cobalt, fluoride, lead, lithium, mercury, molybdenum, pH, radium 226 and 228 combined, selenium, sulfate, thallium, total dissolved solids, and turbidity), during the baseline phase of the groundwater monitoring program.

The background monitoring well(s) were placed upgradient of the CCR unit, or at an alternative background location, where they are not affected by potential leakage from the CCR unit. Compliance monitoring wells were placed at the waste boundary of the CCR unit, along the same groundwater flow path. As 35 I.A.C. § 845.630(a) specifies, the location of these wells ensures that background accurately represents the quality of unaffected groundwater, while compliance wells accurately represent groundwater quality at the waste boundary and monitor all potential contaminant pathways.

As required by 35 I.A.C. § 845.650(a)(1), eight sampling events were completed within 180 days of April 21, 2021. As outlined, groundwater sampling procedures included sampling of the background and compliance wells using low-flow sampling methods, collection of one field quality control sample per event, and groundwater samples were not field filtered before laboratory analysis of total recoverable metals.

Following completion of the eight sampling events, background groundwater quality was established for Part 845 constituents. Groundwater monitoring will be conducted quarterly for at least the first five years. In accordance with 35 I.A.C. § 845.650(b)(4), after the first five years, a request to reduce the monitoring frequency to semiannual may be submitted to IEPA if all of the following can be demonstrated:

- Groundwater monitoring effectiveness will not be compromised by the reduced frequency
- Sufficient data has been collected to characterize groundwater
- Monitoring to date does not show any statistically significant increasing trends
- The concentrations of monitored constituents at the compliance monitoring wells are below the applicable GWPSs established in 35 I.A.C. § 845.600

The following subsections outline the statistical tests and procedures (methods) that will be utilized to evaluate data collected for each constituent in both background and compliance wells for Background and Compliance Monitoring. When necessary and contingent upon equivalent statistical power, an alternative test not included in this Statistical Analysis Plan may be chosen due to site-specific data requirements.

2.1 Sample Independence

Independence of sample results is a major assumption for most statistical analyses. To ensure physical independence of groundwater sampling results, the minimum time between sampling events must be longer than the time required for groundwater to move through the monitoring well. The sampling schedules for both the baseline and compliance monitoring periods are specified in 35 I.A.C. § 845.650(b) and may conflict with the statistical assumption of independence of sample results.

2.2 Non-Detect Data Processing

The reporting limit (RL) will be used as the lower level for the reporting of non-detected groundwater quality data. For all summary statistics (box plots, timeseries, etc.), the RL will be substituted for concentrations reported below the RL, including non-detects. With professional judgement, analytical results between the RL and the method detection limit, *i.e.*, estimated values, typically identified with a "J" flag, may be utilized if provided by the laboratory.

For all statistical test procedures:

- If the frequency of non-detect data are less than or equal to 15 percent, half of the RL will be substituted for these data
- If the non-detect frequency is between 15 percent and 50 percent, either the Kaplan-Meier or robust regression on order statistics (ROS) will be used to estimate the mean and standard deviation adjusted for the presence of left-censored values
- If the non-detect frequency is greater than 50 percent, a non-parametric test will be used
- If only one background result is detected that value will be used as the non-parametric upper prediction limit (UPL)

2.3 Testing for Normality

Many statistical analyses assume that sample data are normally distributed (parametric). However, environmental data are frequently not normally distributed (nonparametric). 35 I.A.C. § 845.640(g) requires the knowledge of the background data distribution for comparison to compliance results. The *Unified Guidance* document recommends the Shapiro-Wilk normality test for sample sizes of 50 or less, and the Shapiro-Francia normality test for sample sizes greater than 50.

When possible, transformation of datasets to achieve normal distributions is preferred.

2.4 Testing for Outliers

Part 845 constituents will be screened for the existence of outliers using a method described by the *Unified Guidance*. Outliers are extreme data points that may represent an anomaly or erroneous data point. To test for outliers, one or more of the following outlier tests will be utilized:

- Dixon's test, for well-constituent pairs with less than 25 samples, assumes normally distributed data.
- Rosner's test, for well-constituent pairs with more than 20 samples, assumes normally distributed data.
- Grubb's test for well-constituent pairs with seven or more samples, assumes normally distributed data.
- Time series, box-whisker plots, and probability plots provide visual tools to identify potential outliers, and evaluation of seasonal, spatial, or temporal variability for both normally and non-normally distributed data.

Data quality control, groundwater geochemistry, and sampling procedures will be evaluated as potential sources of error leading to an outlier result. The outlier tests cannot be used alone to determine whether a value is a true outlier that should be excluded from future statistical

analysis. Corroborating evidence needed to exclude values includes a discrete data reporting or analytical error, or potential laboratory bias. Absent corroborating evidence, the flagged values are considered true, but extreme, values in the data set. Professional judgement will be used to exclude extreme outliers from further statistical analyses. Outliers will be retained in the database.

With professional judgement, a confirmatory sample may be collected to allow for the distinction between an outlier and a true representation of groundwater quality at the monitoring point. If re-sampling is conducted, this sample will be collected within 90 days following outlier identification. If the confirmatory sample indicates the original result as an outlier, it will be reported as such.

2.5 Trend Analysis

Statistical analyses supporting the lack of trend are a fundamental step to confirm the assumption that groundwater quality values are stationary or constant over time at a CCR unit. These analyses allow for evaluation of variation in the background and compliance data for each constituent over time. A statistically significant increasing trend in background data could indicate an existing release from the CCR unit or alternate source, requiring further investigation. In addition, statistically significant trending background data can result in increased standard deviation and, therefore, greater prediction or control limits. Consequently, the increased prediction or control limit will have less power or ability to identify a release from the CCR unit.

A linear regression, coupled with a t-test for slope significance at a 95 percent confidence level (0.05 significance level), may be used on datasets for each constituent with few non-detects and a normally distributed variance of the mean to evaluate time trends. The Theil-Sen trend line, coupled with the Mann-Kendall test for slope significance at a 95 percent confidence level (0.05 significance level), will be used for datasets with frequent non-detects or non-normal variance. Similarly, trend analyses could also be used on compliance data to evaluate a possible release from the CCR unit.

2.6 Spatial Variation

Spatial trends and/or variation between background wells could indicate an existing release from a CCR unit. If the spatial variability is not due to an existing release, intrawell comparisons in compliance wells may be used to account for spatial variability and monitor for a future release. However, the CCR unit being monitored was placed into service prior to the start of groundwater monitoring and it is unknown whether a previous release has occurred. Accordingly, intrawell comparisons in compliance wells cannot be used to determine the occurrence of a future release. Interwell comparisons between compliance wells and background wells will be used.

2.7 Temporal Variation

Time series plots can be used to identify temporal dependence. Potentially significant temporal components of variability can be identified by graphing single constituent data from multiple wells together on a time series plot. With temporal dependence, the time series plot as a pattern of parallel traces, in which the individual wells will tend to rise and fall together across the sequence of sampling dates. Time series plots can be helpful by plotting multiple constituents over time for the same well, or averaging values for each constituent across wells on each sampling event and then plotting the averages over time. In either case, the plots can signify whether the general concentration pattern over time is simultaneously observed for different

constituents. If so, it may indicate that a group of constituents is highly correlated in groundwater or that the same artifacts of sampling and/or lab analysis impacted the results of several monitoring parameters.

Hydrologic factors such as drought, recharge patterns or regular (e.g., seasonal) water table fluctuations may be responsible for the temporal variation. In these cases, it may be useful to test for the presence of a significant temporal effect by first constructing a parallel time series plot and then running a formal one-way analysis of variance (ANOVA) ($\alpha = 0.05$) for temporal effects. A one-way ANOVA for temporal effects considers multiple well data sets for individual sampling events or seasons as the relevant statistical factor. If event-specific analytical differences or seasonality appear to be an important temporal factor, the one-way ANOVA for temporal effects can be used to formally identify seasonality, parallel trends, or changes in lab performance that affect other temporal effects. The one-way ANOVA for temporal effects assumes that the data groups are normally distributed with constant variance. It is also assumed that for each of a series of background wells, measurements are collected at each well on sampling events or dates common to all the wells. Results of the ANOVA can also be used to create temporally stationary residuals, where the temporal effect has been 'subtracted from' the original measurements. These stationary residuals may be used to replace the original data in subsequent statistical testing.

If the data cannot be normalized, a similar test for a temporal or seasonal effect can be performed using the Kruskal-Wallis test ($\alpha = 0.05$). Each sampling event should be treated as a separate 'well,' while each well is treated as a separate 'sampling event.' In this case, no residuals can be computed since the Kruskal-Wallis test employs ranks of the data rather than the measurements themselves.

Where both spatial and temporal variation occur, two-way ANOVA can be considered where both well location and sampling event/season are treated as statistical factors. This procedure is described in Davis (1994).

2.8 Updating Background

Updating the background dataset periodically by adding recent results to an existing background dataset can improve the statistical power and accuracy of the statistical analysis, especially for non-parametric prediction intervals. The *Unified Guidance* recommends updating statistical limits (background) when at least four to eight new measurements (every 1 to 2 years under a quarterly monitoring program), are available for comparison to historical data. Professional judgement will be used to evaluate whether any background data appear to be affected by a release and need to be excluded from a background update. A t-test for equal means (if normal data distribution) or appropriate non-parametric test (if non-normal data distribution) such as a Mann-Whitney (or Wilcoxon) rank-sum or box-whisker plots, will be conducted to evaluate whether the two groups of background sample populations are statistically different prior to updating any background datasets. A 0.05 significance level will be utilized when evaluating the two populations, with the null hypothesis that they are equivalent. In addition, time series graphs or other trend evaluation statistics will be conducted on the new background dataset to verify the absence of a release or changing groundwater quality. If the tests indicate that there are no statistical differences between the two background populations, the new data will be combined with the existing dataset. If the two populations are found to be different, the data will be reviewed to evaluate the cause of the difference. If the differences appear to be caused by a

release (if the new data are significantly higher, or lower for pH), then the previous background dataset may continue to be used. Furthermore, verified outliers will not be added to an existing background dataset. In accordance with the *Unified Guidance*, continual background updates will not be conducted due to the lack of sufficient samples for a statistical comparison.

3. COMPLIANCE MONITORING

Compliance monitoring is designed to monitor groundwater for evidence of a release by comparing Part 845 constituents in compliance wells to both background concentrations and the GWPS. Compliance Monitoring will begin the 1st quarter following approval of this Groundwater Monitoring Plan and issuance of the Operating Permit. The selected Compliance Monitoring statistical method used to compare compliance groundwater quality data for each constituent to the GWPS will provide for adequate statistical power, error levels and individual test false positive rates, and be appropriate for the distribution and detection frequency of the background dataset. Statistical power is the ability of a statistical test to detect a true exceedance.

In accordance with 35 I.A.C. § 845.610(b)(3)(D), compliance monitoring statistical analyses will be completed and submitted to IEPA within 60 days after completion of sampling.

3.1 GWPS Establishment and Exceedance Determination

In accordance with 35 I.A.C. § 845.600(a), the GWPS will be the constituent concentrations specified in 35 I.A.C. § 845.600(a)(1) except for when the background concentration is greater, or no concentration is specified (*i.e.*, for calcium and turbidity), in which case the GWPS will be the background concentration. The GWPS based on background concentration will be calculated using a parametric upper tolerance limit (UTL), a parametric UPL for a future mean, or a non-parametric UPL for a future median.

Statistical calculations that will be utilized in Compliance Monitoring procedures are summarized in **Table A** below and listed in **Sections 3.1.1** through **3.1.7**. Depending on the distribution of the data and the percentage of non-detects, it may be more appropriate to use a parametric model over a non-parametric model. As necessary, other techniques as mentioned in the *Unified Guidance* and/or new methods will be implemented.

Table A. Statistical Calculations Used in Compliance Monitoring Procedures

Compliance Monitoring						
Significant Trend?	Background Data			Compliance Data		
	Percent Non-Detects	Distribution	GWPS Determination	Percent Non-Detects	Distribution	Method to Determine Exceedance
No	0 ≤ 50	Normal	35 I.A.C § 845.600(a)(1) constituent concentration or The Upper Tolerance Limit	≤75	Normal	Parametric Lower Confidence Limit around a Normal Mean
				≤75	Log-Normal	Parametric Lower Confidence Limit around a Lognormal Geometric Mean
				NA	Non-Normal	Non-Parametric Lower Confidence Limit around a Median
				>75	Unknown/ Cannot be determined	
	50 ≤ 70	Normal	The Upper Prediction Limit for a Future Mean	NA	NA	Future mean
	>70	Non-Normal	Upper Prediction Limit for a Future Median	NA	NA	Future median
100	Non-Normal	Double Quantification Rule	NA	NA	Individual Retesting Values	
Yes	0 ≤ 50	Normal	UCL of Confidence Band around Linear Regression	≤75	Residuals after subtracting trend are normal, equal variance	Lower Limit from Confidence Band around Linear Regression
	50 ≤ 100	Non-Normal	UCL of Confidence Band around Thiel-Sen trend line	≤75	Residuals not normal	Lower Limit from Confidence Band around Thiel-Sen

3.1.1 The Upper Tolerance Limit

The UTL will be used to calculate the GWPS when pooled background data are normally distributed, with a non-detect frequency of 50 percent or less. When non-detect frequency is 15 percent or less, half the RL will be substituted for non-detects. The *Unified Guidance* recommends 95 percent confidence level and 95 percent coverage (95/95 tolerance interval).

- When non-detect frequency is 15 percent or less, half the RL will be substituted for non-detects (simple substitution), and the normal mean and standard deviation will be calculated.

- The Kaplan-Meier or the ROS method will be used when the detection frequency is between 15 percent and 50 percent. The Kaplan-Meier method assesses the linearity of a censored probability plot to determine whether the background sample can be approximately normalized. If so, then the Kaplan-Meier method will be used to compute estimates of the mean and standard deviation adjusted for the presence of left-censored values. The Kaplan-Meier or ROS estimate of the mean and standard deviation will be substituted for the sample mean and standard deviation.
- If background normality cannot be achieved, non-parametric UTLs will not be calculated until a minimum of 60 background samples have been collected (to achieve 95 percent coverage).

The parametric UTL on a future mean will be calculated from the background dataset as follows:

$$UTL = \bar{x} + \kappa(n, \gamma, \alpha - 1) \cdot s$$

\bar{x} = background sample mean

s = background sample standard deviation

$\kappa(n, \gamma, \alpha - 1)$ = one-sided normal tolerance factor based on the chosen coverage (γ) and confidence level ($\alpha - 1$) and the size of the background dataset (n). Values are tabulated in Table 17-3 in Appendix D of the *Unified Guidance*. If exact values are not provided, then κ values can be estimated by linear interpolation.

If the UTL is constructed on the logarithms of original observations to achieve normality, where \bar{y} and s_y are the log-mean and log-standard deviation, the limit will be exponentiated for back-transformation to the concentration scale as follows:

$$UTL = \exp[\bar{y} + \kappa(n, \gamma, \alpha - 1) \cdot s_y]$$

\bar{y} = background sample log-mean

s_y = background sample log-standard deviation

When the GWPS is based on the 35 I.A.C. § 845.600(a)(1) constituent concentrations or a UTL derived from the background dataset, an exceedance in compliance wells relative to the GWPS will be evaluated using confidence intervals. A confidence interval defines the upper and lower bound of the true mean of a constituent concentration in groundwater within a specified confidence range.

- Non-detects in compliance data will be handled similarly to upgradient analyses, with half the RL substituted for non-detects when the frequency is 15 percent or less.
- The Kaplan-Meier, or the ROS method, will be used when the detection frequency is between 15 percent and 50 percent to compute estimates of the mean and standard deviation adjusted for the presence of left-censored values. These estimates will then be substituted for the sample mean and standard deviation.

Once the GWPS is established for background data using the UTL, either parametric or non-parametric confidence intervals will be computed for each constituent in compliance wells to identify GWPS exceedances.

3.1.2 Parametric Confidence Intervals around a Mean

If compliance data are approximately normal, one-sided parametric confidence intervals around a sample mean will be constructed for each constituent and well pair. The lower confidence limit (LCL) will be calculated as:

$$LCL_{1-\alpha} = \bar{x} - t_{1-\alpha, n-1} \cdot \frac{s}{\sqrt{n}}$$

\bar{x} = compliance sample mean

s = compliance sample standard deviation

n = compliance sample size

$t_{1-\alpha, n-1}$ = obtained from a Student's t-table with (n-1) degrees of freedom (Table 16-1 in Appendix D of the *Unified Guidance*)

The chosen t value will aim to achieve both a low false-positive rate, and high statistical power. Minimum α values are tabulated in Table 22-2 of Appendix D of the *Unified Guidance*. The selected minimum α value, from which the t value will be derived, will have at least 80 percent power ($1-\beta = 0.8$) when the underlying mean concentration is twice the GWPS.

If compliance data are distributed lognormally, the LCL will be computed around the lognormal geometric mean as:

$$LCL_{1-\alpha} = \exp\left(\bar{y} - t_{1-\alpha, n-1} \cdot \frac{s_y}{\sqrt{n}}\right)$$

\bar{y} = compliance sample log-mean

s_y = compliance sample log-standard deviation

3.1.3 Non-Parametric Confidence Intervals around a Median

Non-parametric confidence intervals around the median will be computed if the compliance data contain greater than 50 percent non-detects or are not normally distributed. The mathematical algorithm used to construct non-parametric confidence intervals is based on the probability (P) that any randomly selected measurement in a sample of n concentration measurements will be less than an unknown $P \times 100^{\text{th}}$ percentile of interest (where P is between 0 and 1). Then the probability that the measurement will exceed the $P \times 100^{\text{th}}$ percentile is $(1-P)$. The number of sample values falling below the $P \times 100^{\text{th}}$ percentile out of a set of n should follow a binomial distribution with parameters n and success probability P , where 'success' is defined as the event that a sample measurement is below the $P \times 100^{\text{th}}$ percentile. The probability that the interval formed by a given pair of order statistics will contain the percentile of interest will then be determined by a cumulative binomial distribution $Bin(x; n, p)$, representing the probability of x or fewer successes occurring in n trials with success probability p . P will be set to 0.50 for an interval around the median.

The sample size n will be ordered from least to greatest. Given $P = 0.50$, candidate interval endpoints will be chosen by ordered data values with ranks close to the product of $(n+1) \times 0.50$. If the result of $(n+1) \times 0.50$ is a fraction (for even-numbered sample sizes), the rank values immediately above and below will be selected as possible candidate endpoints. If the result of $(n+1) \times 0.50$ is an integer (for odd-numbered sample sizes), one will be added to and subtracted

from the result to get the upper and lower candidate endpoints. The ranks of the endpoints will be denoted L^* and U^* . For a one-sided LCL, the confidence level associated with endpoint L^* will be computed as:

$$1 - \alpha = \text{Bin}(L^* - 1; n, 0.50) = \sum_{x=L^*}^n \binom{n}{x} \left(\frac{1}{2}\right)^n$$

If the candidate endpoint(s) do not achieve the desired confidence level, new candidate endpoints (L^*-1) and (U^*+1) and achieved confidence levels will be calculated. If one candidate endpoint equals the data minimum or maximum, only the rank of the other endpoint will be changed. Achievable confidence levels are tabulated using these equations in Table 21-11 in Appendix D of the *Unified Guidance*.

Both parametric and non-parametric confidence limits will then be compared to the GWPS. The CCR unit is considered to be in compliance if the LCL is equal to or lower than the GWPS for all detected constituents at all compliance monitoring wells. A GWPS exceedance is determined if the LCL exceeds the GWPS.

3.1.4 The Upper Prediction Limit for a Future Mean

The parametric UPL for a future mean will be used to calculate the GWPS if the pooled background data contain 50 to 70 percent non-detects and normality can be achieved. The Kaplan-Meier or ROS methods will be used to estimate the mean and standard deviation. The non-parametric UPL for a future median will be calculated as the GWPS if background samples cannot be normalized or contain greater than 70 percent non-detects. The parametric UPL for a future mean will be calculated from the background dataset at follows:

$$UPL_{1-\alpha} = \bar{x} + \kappa s$$

\bar{x} = background sample mean

s = background standard deviation

κ = multiplier based on the order (p) of the future mean to be predicted, the number of compliance wells to be tested (w), the background sample size (n) the number (c) of constituents of concern (COCs), the "1-of- m " retesting scheme, and the evaluation schedule (annual, semi-annual, quarterly). Values are tabulated in 19-5 to 19-9 in Appendix D of the *Unified Guidance*.

The mean of order p will be computed for each well and compared against the UPL. For any compliance point mean that exceeds the limit, p additional resamples may be collected at that well for a 1-of-2 retesting scheme. Resample means will then be compared to the UPL. A GWPS exceedance has been deemed to occur at a compliance well when the initial mean and all resample means exceed the UPL.

3.1.5 The Non-Parametric Upper Prediction Limit for a Future Median

The non-parametric UPL for a future median will be used to calculate the GWPS if the pooled background data contain greater than 70 percent non-detects and normality cannot be achieved. Non-parametric methods assume that the data does not have an underlying distribution. To calculate the non-parametric UPL on a future value, the target per-constituent false positive rate (a_{const}) will be determined as follows:

$$\alpha_{const} = 1 - (1 - \alpha)^{1/c}$$

α = the site-wide false positive rate (SWFPR) of 0.10 recommended by the *Unified Guidance*

c = the number of monitoring constituents

The number of yearly statistical evaluation (nE) will be multiplied by the number of compliance wells (w) to determine the look-up table entry, w^* . The background sample size (n) and w^* will be used to select an achievable per-constituent false positive rate value in Table 19-24 of Appendix D in the *Unified Guidance*. The chosen achievable per-constituent false positive rate value will determine the type of non-parametric prediction limit (maximum or 2nd highest value in background) and a retesting scheme for a future median. The background data will be sorted in ascending order, and the upper prediction limit will be set to the appropriate order statistic previously determined by the achievable per-constituent false positive rate value in Table 19-24. If all constituent measurements in a background sample are non-detect, the Double Quantification rule will be used. The use of the Double Quantification rule in Compliance Monitoring will only be applicable if the RL is above the 35 I.A.C. § 845.600(a)(1) constituent concentration or a constituent concentration is not specified in § 845.600(a)(1). This scenario is highly unlikely. The constituent will also be removed from calculations identifying the target false positive rate.

Two initial measurements per compliance well will be collected. If both do not exceed the upper prediction limit, a third initial measurement will not be collected since the median of order 3 will also not exceed the limit. If both exceed the prediction limit, a third initial measurement will not be collected since the median will also exceed the limit. If one initial measurement is above and one below the limit, a third initial observation may be collected to determine the position of the median relative to the UPL. Up to three resamples will be collected in order to assess the resample median. In all cases, if two or more of the compliance point observations are non-detect, the median will be set equal to the RL. The median value for each compliance well will be compared to the UPL. For the 1-of-2 retesting scheme, if any compliance point median exceeds the limit, up to three additional resamples will may be collected from that well. The resample median will be computed and compared to the UPL. A GWPS exceedance has been deemed to occur at a compliance well when either the initial median, or both the initial median and resample median exceed the UPL.

If the concentrations of detected constituents are below the established GWPS, Compliance Monitoring will continue.

3.1.6 Parametric Linear Regression and Confidence Band

If the t-test detects a significant trend in the parametric linear regression line using either background or compliance data for a particular constituent, confidence bands accounting for trends will be constructed to account for the trend-induced variation. If this is not accounted for, a wider confidence interval will inevitably be calculated for a given confidence level and sample size (n). A wider confidence interval will result in less statistical power, or ability to demonstrate an exceedance or return to compliance. When a linear trend line has been estimated, a series of confidence intervals is estimated at each point along the trend. This creates a simultaneous confidence band that follows the trend line. As the underlying population mean increases or decreases, the confidence band does also to reflect this change at that point in time.

Linear regression will be used when background or compliance data are approximately normally distributed, with a constant sample variance around the mean, and the frequency of non-detects is low. The linear regression of concentration against sampling date (time) will be computed as follows:

$$\hat{b} = \sum_{i=1}^n (t_i - \bar{t}) \cdot x_i / (n - 1) \cdot s_t^2$$

x_i = i^{th} concentration value and

t_i = i^{th} sampling date

\bar{t} = sampling mean date

s_t^2 = variance of the sampling dates

This estimate leads to the following regression equation:

$$\hat{x} = \bar{x} + \hat{b} \cdot (t - \bar{t})$$

\bar{x} = mean concentration level

\hat{x} = estimated mean concentration at time t

The regression residuals will also be computed at each sampling event to ensure uniformity and lack of significant skewness. Regression residuals will be computed at each sampling event as follows:

$$r_i = x_i - \hat{x}_i$$

The estimated variance around the regression line, or mean squared error (MSE) will be computed as follows:

$$s_e^2 = \frac{1}{n - 2} \sum_{i=1}^n r_i^2$$

The confidence intervals around a linear regression trend line given confidence level $(1-\alpha)$ and a point in time (t_0), will be computed as follows:

$$LCL_{1-\alpha} = \hat{x}_0 - \sqrt{2s_e^2 \cdot F_{1-2\alpha, 2, n-1} \cdot \left[\frac{1}{n} + \frac{(t_0 - \bar{t})^2}{(n-1) \cdot s_t^2} \right]}$$

$$UCL_{1-\alpha} = \hat{x}_0 + \sqrt{2s_e^2 \cdot F_{1-2\alpha, 2, n-2} \cdot \left[\frac{1}{n} + \frac{(t_0 - \bar{t})^2}{(n-1) \cdot s_t^2} \right]}$$

\hat{x}_0 = estimated mean concentration from the regression equation at time t_0

$F_{1-2\alpha, 2, n-2}$ = upper $(1-2\alpha)^{\text{th}}$ percentage point from an F-distribution with 2 and $(n-2)$ degrees of freedom

For background data, the UCL around the linear regression line will be used as the GWPS for the trending constituent. For compliance data, confidence bands around the linear regression line will be compared to the GWPS. The CCR unit is considered to be in compliance if the LCL is equal to or lower than the GWPS for all detected constituents at all compliance wells. A GWPS exceedance is determined when the LCL based on the trend line first exceeds the GWPS.

3.1.7 Non-Parametric Thiel-Sen Trend Line and Confidence Band

If the Mann-Kendall test detects a significant trend in the non-parametric Thiel-Sen line using either background or compliance data for a particular constituent, confidence bands accounting for trends will be constructed to account for the trend-induced variation. The Thiel-Sen trend line will be used as a non-parametric alternative to linear regression when trend residuals cannot be normalized or if there are a higher percentage of non-detects in either background or compliance data. The Thiel-Sen trend line estimates the median concentration over time by combining the median pairwise slope with the median concentration value and the median sample date. To compute the Thiel-Sen line, the data will first be ordered by sampling event x_1, x_2, \dots, x_n . All possible distinct pairs of measurements (x_i, x_j) for $j > i$ will be considered and the simple pairwise slope estimate will be computed for each pair as follows:

$$m_{ij} = (x_j - x_i)/(j - i)$$

With a sample size of n , there will be a total of $N = n(n-1)/2$ pairwise estimates (m_{ij}) . If a given observation is a non-detect, half the RL will be substituted. The N pairwise slope estimates (m_{ij}) will be ordered from least to greatest (renamed $m(1), m(2), \dots, m(N)$). The Thiel-Sen estimate of slope (Q) will be calculated as the median value of the list depending on whether N is even or odd as follows:

$$Q = \begin{cases} m_{([N+1]/2)} & \text{if } N \text{ is odd} \\ (m_{(N/2)} + m_{([N+2]/2)})/2 & \text{if } N \text{ is even} \end{cases}$$

The sample concentration magnitude will be ordered from least to greatest, $x(1), x(2), \dots, x(n)$ and the median concentration will be calculated as follows:

$$\tilde{x} = \begin{cases} x_{([n+1]/2)} & \text{if } n \text{ is odd} \\ (x_{(n/2)} + x_{([n+2]/2)})/2 & \text{if } n \text{ is even} \end{cases}$$

The median sampling date (\tilde{t}) with ordered times ($t(1), t(2), \dots, t(n)$) will also be determined in this way. The Thiel-Sen trend line will then be computed for an estimate at any time (t) of the expected median concentration (x) as follows:

$$x = \tilde{x} + Q \cdot (t - \tilde{t}) = (\tilde{x} - Q \cdot \tilde{t}) + Q \cdot t$$

To construct a confidence band around the Thiel-Sen line, sample pairs (t_i, x_i) will be formed with a sample date (t_i) and the concentration measurement from that date (x_i). Bootstrap samples (B) will be formed by repeatedly sampling n pairs at random with replacement from the original sample pairs. This will be repeated 500 times. For each bootstrap sample, a Thiel-Sen trend line will be constructed using the equation above. A series of equally spaced time points (t_j) will be identified along the range of sampling dates represented in the original sample, $j = 1$ to m . The Thiel-Sen trend line associated with each bootstrap replicate will be used to compute an estimated concentration (\hat{x}_j^B). An LCL will be constructed for the lower α^{th} percentile $\hat{x}_j^{[\alpha]}$ from the distribution of estimated concentrations at each time point (t_j). For a UCL, compute the upper $(1-\alpha)^{\text{th}}$ percentile, $\hat{x}_j^{[1-\alpha]}$ at each time point (t_j).

For background data, the UCL around the Thiel-Sen trend line will be used as the GWPS for the trending constituent. For compliance data, confidence bands around the Thiel-Sen trend line will be compared to the GWPS. The CCR unit is considered to be in compliance if the LCL is equal to or lower than the GWPS for all detected constituents at all compliance wells. A GWPS exceedance is confirmed when the LCL based on the trend line first exceeds the GWPS.

3.2 Determination of Statistically Significant Increases over Background

In accordance with 35 I.A.C. §§ 845.610(b)(3)(B) and 845.640(h), individual monitoring event concentrations for each constituent detected in the compliance monitoring wells during compliance monitoring sampling events will be compared to the background concentration as determined by the methods described above. An exceedance of the background concentration for any constituent measured at any compliance monitoring well, or constituent detection if not detected in the background samples, constitutes a Statistically Significant Increase (SSI). An exception to this method is pH, where two-sided (upper and lower) tolerance limits are established from the distribution of the background groundwater quality data. An exceedance of either the UTL or lower tolerance limit (LTL) would constitute an SSI for pH.

4. REFERENCES

Davis, C.B., 1994. *Environmental Regulatory Statistics*. In GP Patil & CR Rao (Eds.) *Handbook of Statistics, Volume 12: Environmental Statistics*, Chapter 26. New York: Elsevier Science B.V.

United States Environmental Protection Agency (USEPA), 2009. *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities: Unified Guidance*. EPA 530-R-09-007. March 2009.

ATTACHMENT J

Memorandum



Date: 25 October 2021

Subject: 35 I.A.C. Section 845.430 – Slope Maintenance Documentation for East Ash Pond at Hennepin Power Plant

Dynegy Midwest Generation, LLC (DMG) operates the coal-fired Hennepin Power Plant located in Putnam County, Illinois. The East Ash Pond is an inactive surface impoundment storing coal combustion residuals (CCR). The requirements for the East Ash Pond are found in 35 Ill. Admin. Code Part 845, Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments (Part 845).

Pursuant to Part 845, Section 845.230(d)(2)(F), the initial operating permit application for existing or inactive CCR surface impoundments that have not completed an Agency approved closure before prior to July 30, 2021, must contain documentation that the CCR surface impoundment, if not incised, will be operated, and maintained with one of the forms of slope protection specified in Section 845.430. This statement addresses the requirements of Part 845, Section 845.430 Slope Maintenance, which states:

Section 845.430: The slopes and pertinent surrounding areas of the CCR surface impoundment must be designed, constructed, operated, and maintained with one of the forms of slope protection specified in subsection (a) that meets all the performance standards of subsection (b).

Section 845.430(a): Slope protection must consist of one of the following: 1) A vegetative cover consisting of grassy vegetation; 2) An engineered cover consisting of a single form or combination of forms of engineered slope protection measures; or 3) A combination of the forms of cover specified in subsections (a)(1) or (a)(2).

Section 845.430(b): Any form of cover for slope protection must meet the following performance standards: 1) The cover must be installed and maintained on the slopes and pertinent surrounding areas of the CCR surface impoundment; 2) The cover must provide protection against surface erosion, wave action, and adverse effects of rapid drawdown; 3) The cover must be maintained to allow for the observation of, and access to, the slopes and pertinent surrounding areas during routine and emergency events; 4) Woody vegetation must be removed from the slopes or pertinent surrounding areas. Any removal of woody vegetation with a diameter greater than 1/2 inch must be directed by a person familiar with the design and operation of the CCR surface impoundment and in consideration of the complexities of removal of a tree or a shrubbery, who must ensure the removal does not create a risk of destabilizing the CCR surface impoundment or

35 I.A.C. Part 845 – Slope Maintenance Documentation for East Ash Pond at Hennepin Power Plant

25 October 2021

Page 2

otherwise adversely affect the stability and safety of the CCR surface impoundment or personnel undertaking the removal; and 5) The height of vegetation must not exceed 12 inches.

Slope protection, consisting of vegetative cover, was installed on the slopes and pertinent surrounding areas of the Hennepin East Ash CCR impoundment, and is inspected, maintained and repaired as needed. Based on observations from weekly inspections conducted in accordance with Section 845.540(a), and the 2020 annual inspections conducted by Hanson Professional Services Inc., the vegetative cover is described to be in good working condition with a maximum vegetation height of 12 inches. The owner's Operations and Maintenance Plan (O&M Plan) provides details for maintaining grass and removing woody vegetation and addressing erosion features on the slopes. Based on a review of the documentation described above, the owner is implementing the O&M Plan, including the completion of repairs and maintenance as needed and when issues are identified during weekly and/or annual inspections. The slope maintenance portion of the O&M Plan and the Annual Inspection performed by Hanson in 2020 are included in Attachment J. The surface impoundment slope protection (vegetative cover) installed and maintained on the slopes and pertinent areas around the slopes is depicted in the aerial photograph provided below.



Excerpt from the Hennepin EAP Operations and Maintenance Manual

1.0 MAINTENANCE

1.1 Vegetation

Dikes shall be maintained to protect the structural integrity of the disposal facility. Damaged and barren areas shall be repaired as soon as appropriate after being discovered. Damaged areas shall be filled with topsoil. Limed, fertilized, and seeded with appropriate vegetation. Trees and shrubs observed during periodic inspections shall be cut and removed from the dikes and discharge channel. This shall be done as frequently as is necessary to ensure that no tree reaches a size where the root structure would require removal and filling. Woody vegetation, shrubs, and trees shall be removed during the early stages of growth before reaching a three-inch diameter.

Low growing vegetation shall be planted and maintained to facilitate inspections.

1.2 Discharge Structure

The discharge structure shall be inspected periodically for significant corrosion, spalling, and cracking. Any defects discovered shall be promptly repaired.

1.3 Animal Damage and Repairs

Animal burrows discovered during inspections shall be promptly repaired by filling with grout.

1.4 Restriction of Unauthorized Vehicles

Facility approaches shall be posted with signs restricting unauthorized travel on the roadways and slopes.

1.5 Inspections/Remedial Measures

1.5.1 Weekly Inspections

Weekly inspections of the perimeter berms shall be conducted, looking for seepage and slumping, and unusual seepage at and/or blockage of the outfall structures in each cell. All findings shall be entered into the weekly inspection checklist, discussed in Section 4.0. Maintenance activities shall be initiated, if required. Refer to Section 4.0 for the recommended inspection checklist to be used for the weekly inspections.

1.5.2 Quarterly Inspections

Inspections shall be made quarterly by Station personnel to determine the general condition of the dam and embankments. During these inspections, embankment erosion, tree growth, and embankment seepage shall be monitored. Seepage shall be observed for change in quantity and coloration. Refer to Section 4.0, for the recommended inspection checklist to be used for documenting the quarterly inspections.

1.5.3 Five-Year Inspections

Every five years, an inspection shall be made by a licensed professional engineer. This inspection shall follow the Illinois Department of Natural Resources (IDNR) *Guidelines and Forms for Inspection of Illinois Dams* and shall be followed by verbal and written reports by the consulting engineer. Based on the findings of the inspection, the Station Manager shall implement corrective action as required to promote dam safety. Procedures and methods for corrective action shall be performed in accordance with recommendations of the consulting engineer and as outlined above. Copies of the engineer's report, along with corrective action taken, shall be reported to the IDNR.

1.6 Annual Statement

An annual statement on forms furnished by IDNR, certifying compliance with this maintenance plan, shall be submitted to IDNR.

Dam Inspection Report

Name of Dam Hennepin East Ash Pond Dam ID No. IL 50363

Permit Number DS2004119 Class of Dam III

Location NE 1/4 Section 26 Township 33N Range 2W

Owner Dynegy Midwest Generation 815-339-9210
Name Telephone Number (Day)

RR1, Box 200AA 815-339-9215
Street Telephone Number (Night)

Hennepin 61327 County Putnam
City Zip Code

Type of Dam Earth embankment with geosynthetic-clay liner

Type of Spillway Drop structure and stop logs

Date(s) Inspected 11-Nov-20

Weather When Inspected Pt. Cloudy

Temperature When Inspected 38 F

Pool Elevation When Inspected Primary 481.4, Secondary 479.5

Tailwater Elevation When Inspected N.A.

Inspection Personnel:

<u>James P. Knutelski, P.E.</u>	<u>Geotechnical Engineer</u>
Name	Title
<u>Jason Campbell, P.E.</u>	<u>Dynegy Dam Safety</u>
Name	Title
<u>Paul Mauer</u>	<u>IDNR-OWR</u>
Name	Title
Name	Title



J. Knutelski 12/30/2020
Professional Engineer's Seal
EJC 11/30/20

CONDITION CODES

- NE - No evidence of a problem
- GC - Good condition
- MM - Item needing minor maintenance and/or repairs within the year, the safety or integrity of the item is not yet imperiled
- IM - Item needing immediate maintenance to restore or ensure its safety or integrity
- EC - Emergency condition which if not immediately repaired or other appropriate measures taken could lead to failure of the dam
- OB - Condition requires regular observation to ensure that the condition does not become worse
- NA - Not applicable to this dam
- NI - Not inspected - list the reason for non-inspection under deficiencies

EARTH EMBANKMENT

ITEM	CONDITION CODE	DEFICIENCIES	RECOMMENDED REMEDIAL MEASURES AND IMPLEMENTATION SCHEDULE
Surface Cracks	NE		
Vertical and Horizontal Alignment of Crest	GC		
Unusual Movement or Cracking At or Beyond Toe	NE		
Sloughing or Erosion of Embankment and Abutment Slopes	MM	Minor erosion bench on west end adjacent to river. Minor erosion feature near crest adjacent to river.	Add riprap to this area and other areas where flood on river was above riprap. Fill erosion feature, seed areas and monitor.
Upstream Face Slope Protection	NE		
Seepage	NE		
Filter and Filter Drains	NA		

EARTH EMBANKMENT

(Continued)

ITEM	CONDITION CODE	DEFICIENCIES	RECOMMENDED REMEDIAL MEASURES AND IMPLEMENTATION SCHEDULE
Animal Damage	MM	North side animal burrow.	Fill and reseed animal damage.
Embankment Drainage Ditches	GC		
Vegetative Cover	GC	Woody vegetation in riprap at outlet structure in secondary pond.	Remove woody vegetation in riprap in secondary pond.
Riprap	NE		
Articulated blocks	MM	Loss of aggregate between articulated concrete blocks	Replace aggregate between blocks.
Other			
Other			

PRINCIPAL SPILLWAY

Drop Inlet Spillway

Overflow Spillway Structure

Gated

ITEM	CONDITION CODE	DEFICIENCIES	RECOMMENDED REMEDIAL MEASURES AND IMPLEMENTATION SCHEDULE
Erosion, Spalling, Cavitation	OB	Spalling at pedestrian bridge seat on Polishing Pond Riser	Condition has not deteriorated - observe this area and repair if condition deteriorates.
Structure to Embankment Junction	NI	Underwater	
Drains	NA		
Seepage Around or Into Structure	NI	Underwater	
Surface Cracks	NI	Underwater	
Structural Cracks	NI	Underwater	

IF THE SPILLWAY IS GATED FILL OUT THE GATES SECTION

PRINCIPAL SPILLWAY

(Continued)

Drop Inlet Spillway

Overflow Spillway Structure

Gated

ITEM	CONDITION CODE	DEFICIENCIES	RECOMMENDED REMEDIAL MEASURES AND IMPLEMENTATION SCHEDULE
Alignment of Abutment Walls	NA		
Construction Joints	NA		
Filter and Filter Drains	NA		
Trash Racks	NA		
Bridge and Piers	NE		
Differential Settlement	NE		
Other (Name)			

IF THE SPILLWAY IS GATED FILL OUT THE GATES SECTION

PRINCIPAL SPILLWAY

(Continued)

Conduit

Gated

ITEM	CONDITION CODE	DEFICIENCIES	RECOMMENDED REMEDIAL MEASURES AND IMPLEMENTATION SCHEDULE
Erosion, Spalling, Cavitation	NE		
Joint Separation	NI	Underwater	
Seepage Around of Into Conduit	NI	Underwater	
Surface Cracks	NI	Underwater	
Structural Cracks	NI	Underwater	
Trash Racks	NA		
Differential Settlement	NI	Underwater	
Alignment	NI	Underwater	
Other (Name)			

IF THE SPILLWAY IS GATED FILL OUT THE GATES SECTION

PRINCIPAL SPILLWAY

Principal Spillway

Dewatering

Other: _____

ITEM	CONDITION CODE	DEFICIENCIES	RECOMMENDED REMEDIAL MEASURES AND IMPLEMENTATION SCHEDULE
Gate Sill	NI	Underwater	
Gate Seals	NI	Underwater	
Gate and Frame (Stoplogs)	GC		
Operating Machinery	NA		
Emergency Operating Machinery	NA		
Outlet Flume	GC		
Outlet Discharge	GC		Note: Outlets to river backwater area.

SUMMARY OF MAINTENANCE DONE AND/OR
REPAIRS MADE SINCE THE LAST INSPECTION

DATE OF PRESENT INSPECTION 11-Nov-20

DATE OF LAST INSPECTION 6-Nov-19

1. EARTH EMBANKMENT DAMS
Slopes and interior of closed pond regraded and reseeded.

2. CONCRETE MASONRY DAMS
NA

3. PRINCIPAL SPILLWAY
None

4. OUTLET WORKS
None.

5. EMERGENCY SPILLWAY
NA



North side exterior



North side exterior



North side adjacent to river – repair erosion



North side adjacent to river



North side erosion feature – repair and reseed



North side let down structure - typical



East exterior slope



Old pond – new pond separator berm



New pond interior



Primary pond – secondary pond separator berm



Primary pond – secondary pond separator berm



South side new pond – aggregate missing – fill voids between blocks



Secondary pond outlet structure and bridge



Secondary pond and outlet structure to river – spray/remove vegetation in riprap



West side crest – west interior filled



West downstream slope – filled area

ATTACHMENT K

POST-CLOSURE PLAN FOR EXISTING CCR SURFACE IMPOUNDMENT
40 C.F.R. § 257.104 and 35 I.A.C. 845.780
REV 0 – 10/30/2021

SITE INFORMATION

Site Name / Address	Hennepin Power Plant / 13498 East 800 th Street, Hennepin, IL 61327		
Owner Name / Address	Dynergy Midwest Generation, LLC / 6555 Sierra Drive Irving, Texas 75039		
CCR Unit	East Ash Pond	Closure Method and Final Cover Type	Close In-Place Geomembrane with Soil and Vegetation Cover

POST-CLOSURE PLAN DESCRIPTION

40 C.F.R. § 257.104(c)(1) and 35 I.A.C. 845.780(c)(1) – Length of post-closure care period.	<p>Post-closure care will be conducted for a period of 30 years as required by 40 C.F.R. § 257.104(c)(1) and 35 I.A.C. 845.780(c)(1), except as provided by 40 C.F.R. § 257.104(c)(2) and 35 I.A.C. 845.780(c)(2).</p>
40 C.F.R. § 257.104(c)(2) and 35 I.A.C. 845.780(c)(2) – Circumstances extending the post closure care period.	<p>If at the end of the post-closure care period the CCR unit is operating under assessment monitoring in accordance with §257.95, the post-closure care as described in this plan will continue until returning to detection monitoring in accordance with §257.95.</p> <p>Under 35 I.A.C. 845.780(c)(2), the post-closure care period will be extended until groundwater monitoring data demonstrate that concentrations are below the groundwater protection standards in Section 845.600 and are not increasing for those constituents over background, using the statistical procedures and performance standards in Section 845.640(f) and (g), provided that concentrations have been reduced to the maximum extent feasible and concentrations are protective of human health and the environment.</p>
40 C.F.R. § 257.104(d)(1)(i) and 35 I.A.C. 845.780(d)(1)(A) – A description of the monitoring and maintenance activities required in 40 C.F.R. § 257.104(b) and 35 I.A.C. 845.780(b), and the frequency at which these activities will be performed, to maintain the integrity and effectiveness of the final cover system, maintain the groundwater monitoring system and monitor the groundwater.	<p>Pursuant to § 257.104(b)(1) and 35 I.A.C. 845.780(b)(1), throughout the post-closure care period, periodic visual observations of the final cover system and stormwater management system will be performed at least annually for evidence of settlement, subsidence, erosion, or other damage that may adversely affect the integrity and effectiveness of the final cover system. When practical, visual observations of the final cover will be made concurrent with groundwater monitoring activities.</p> <p>Noted evidence of damage, such as rills, surface cracks and settlement, will be repaired to maintain the integrity and effectiveness of the final cover system. Vegetation will be established and maintained on the final cover system, including storm drainage areas, where appropriate, to provide long-term erosion control. Established vegetation and the slope design of the final cover system will prevent potential erosion and damage that may be caused by run-on and run-off.</p> <p>Repair activities may include, but are not limited to, replacing and</p>

	<p>compacting soil cover, repairing drainage channels that have been eroded, filling in depressions with soil, regrading, and reseeding areas of failed vegetation, as necessary.</p> <p>Pursuant to § 257.104(b)(3) and 35 I.A.C. 845.780(b)(3), the groundwater monitoring system will be maintained, and groundwater will be monitored as required by 40 C.F.R. § 257.90 through 40 C.F.R. § 257.98 and 35 I.A.C. 845.600 through 845.680. Monitoring wells will be inspected during each groundwater sampling event. Monitoring wells and associated instrumentation will be maintained so that they perform to the design specifications throughout the life of the monitoring program. Groundwater monitoring frequency will be at least quarterly, except as provided in 40 C.F.R. § 257.94(d) and 35 I.A.C. 845.650(b)(4).</p>
<p>40 C.F.R. § 257.104(d)(1)(ii) and 35 I.A.C. 845.780(d)(1)(B) – The name, address, telephone number and email address of the person or office to contact about the facility during the post-closure care period.</p>	<p>Dynergy Midwest Generation, LLC 6555 Sierra Drive Irving, Texas 75039 800.633.4704 ccr@dynergy.com</p>
<p>40 C.F.R. § 257.104(d)(1)(iii) and 35 I.A.C. 845.780(d)(1)(C) – A description of the planned uses of the property during the post-closure period.</p>	<p>The CCR unit is located at a retired electric generation facility. Planned uses of the property during the post-closure period are currently unknown, except for post-closure care of the CCR unit.</p> <p>Post-closure use of the property will not disturb the integrity of the final cover system or other components of the containment system, or the function of the monitoring systems unless necessary to comply with the requirements of 40 C.F.R. Part § 257, Subpart D and 35 I.A.C. Part 845. Any other disturbance will be conducted following a demonstration that it will not increase the potential threat to human health or the environment, as required by 40 C.F.R. § 257.104(d)(1)(iii) and 35 I.A.C. 845.780 (d)(1)(C). The demonstration will be certified by a qualified professional engineer and submitted to the Illinois Environmental Protection Agency (IEPA). Per 40 C.F.R. § 257.104(d)(1)(iii) notification shall be provided to the State Director that the demonstration has been placed in the operating record and on the owners or operator's publicly accessible internet site.</p> <p>Following closure of the CCR unit, a notation on the deed to the property, or some other instrument that is normally examined during title search, will be recorded in accordance with 40 C.F.R. § 257.102(i) and 35 I.A.C. 845.760(h). The notation will notify potential purchasers of the property that the land has been used as a CCR unit and its use is restricted under the post-closure care requirements in 40 C.F.R. § 257.104(d)(1)(iii) and 35 I.A.C. 845.780(d)(1)(C) or groundwater monitoring requirements per 35 I.A.C. 845.740(b). Within 30 days of recording the deed notation, a notification stating that the notation has been recorded will be submitted to the IEPA and placed in the facility's operating record per 35 I.A.C. 845.760(h)(3). The notification will be placed on the owner or operator's publicly accessible CCR Web site in accordance with 40 C.F.R. § 257.107(i)(9) and 35 I.A.C. 845.810(e) and placed in the facility's operating record as required by 35 I.A.C. 845.800(d)(26) and §257.105(i)(9).</p>

<p>40 C.F.R. § 257.104(d)(3) and 35 I.A.C. 845.780(d)(3)- Amendments to the initial or subsequent written post-closure plan.</p>	<p>Pursuant to 40 C.F.R. § 257.104(d), the initial post closure care plan for the Hennepin East Ash Pond was prepared on October 17, 2016. That plan is being amended pursuant to 40 C.F.R. § 257.104(d)(3)(i). This plan also serves as the initial post-closure care plan, prepared in accordance with 35 I.A.C. 845.780(d).</p> <p>Pursuant to § 257.104(d)(3) and 35 I.A.C. 845.780(d)(3), an operating permit modification application to amend the initial or any subsequent written post-closure care plan developed under 35 I.A.C. 845.780 (d)(1) and § 257.104(d)(1) will be submitted to IEPA. The written post-closure care plan will be amended whenever there is a change in the operation of the CCR surface impoundment that would substantially affect the written post-closure care plan in effect; or unanticipated events necessitate a revision of the written post-closure care plan, after post-closure activities have started.</p> <p>The written post-closure care plan will be amended at least 60 days before a planned change in the operation of the facility or CCR surface impoundment, or within 60 days after an unanticipated event requires the need to revise the existing plan. If the plan is revised after post-closure activities have started, a request to modify the operating permit, including an amended written post-closure care plan, will be submitted to the IEPA within 30 days following the triggering event.</p>
<p>40 C.F.R. § 257.104(d)(4) and 35 I.A.C. 845.780(d)(4) – Qualified professional engineering certification.</p>	<p>Certification by a qualified professional engineer will be appended to this plan and any amendment of this plan.</p>
<p>35 I.A.C. 845.780(e) – Termination of post-closure care.</p>	<p>Upon completion of the post-closure period, a request to terminate post-closure care will be submitted to the IEPA. The request will include a certification by a qualified professional engineer verifying that post-closure care has been completed in accordance with the post-closure care plan specified in 35 I.A.C. 845.780(d) and the requirements of 35 I.A.C. 845.780.</p>
<p>40 C.F.R. § 257.104(e) and 35 I.A.C. 845.780(f) – Notification of completion of the post-closure care period.</p>	<p>A notification of completion of post-closure care will be prepared and placed in the facility’s operating record within 30 days after IEPA approval of the request to terminate post-closure care. The notification will be placed in the facility's operating record in accordance with 35 I.A.C. 845.800(d)(31) and § 257.105(i)(13).</p> <p>The notification will be placed on the owner or operator's publicly accessible CCR Internet site in accordance with the requirements of § 257.107(i)(13) and 35 I.A.C. 845.810(e). The IEPA will be notified when the notification has been placed in the operating record and on the owner or operator's publicly accessible Internet site in accordance with the requirements of § 257.106(i)(13).</p>

**Certification Statement 40 C.F.R. § 257.104 (d)(4) and 35 I.A.C. 845.780(d)(4) – Amended/Initial
Written Post Closure Plan for a CCR Surface Impoundment**

CCR Unit: Dynegy Midwest Generation, LLC; Hennepin Power Plant; East Ash Pond

I, John R. Hesemann, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief, that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above referenced CCR Unit, that the information contained in the amended/initial written post closure plan, dated October 30, 2021, meets the requirements of 40 C.F.R. § 257.104 and 35 I.A.C. 845.780.

John R. Hesemann

Printed Name

9/28/2021

Date



John R. Hesemann
Exp.: 11/30/2021

ATTACHMENT M

HISTORY OF POTENTIAL EXCEEDANCES

This presentation of the History of Potential Exceedances, and any corrective action taken to remediate groundwater, is provided to meet the requirements of Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845.230(d)(2)(M) for the Hennepin Power Plant East Ash Pond, Illinois Environmental Protection Agency (IEPA) ID No. W1550100002-05.

Note

Groundwater concentrations from 2015 to 2021 presented in the Hydrogeologic Site Characterization Report (HCR) Table 4-1, and evaluated and summarized in the following tables, are considered potential exceedances because the methodology used to determine them is proposed in the Statistical Analysis Plan (Appendix A to Groundwater Monitoring Plan [GMP]), which has not been reviewed or approved by IEPA at the time of submittal of the 35 I.A.C. § 845 Operating Permit application.

Alternate sources for potential exceedances as allowed by 35 I.A.C. § 845.650(e) have not yet been evaluated. These will be evaluated and presented in future submittals to IEPA as appropriate.

Table 1 summarizes how the potential exceedances were determined.

Background Concentrations

Background monitoring wells identified in the GMP include 07, 08, 08D, 16, and 17.

For monitoring wells that have been historically monitored in accordance with Title 40, Code of Federal Regulations, Part 257, Subpart D (Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments), background concentrations calculated from sampling events in 2015-2017 were compared to the standards identified in 35 I.A.C. § 845.600(a)(1). For constituents with calculated background concentrations in 2015-2017 greater than the standards in 35 I.A.C. § 845.600(a)(1), those calculated background concentrations were used as Groundwater Protection Standards (GWPSs) for comparing to statistical calculation results for each compliance well to determine potential exceedances. Compliance well statistical calculations consider concentrations from all sampling events in 2015-2021.

For all other monitoring wells, either newly constructed in 2021 or existing wells not monitored under Title 40, Code of Federal Regulations, Part 257, Subpart D, background concentrations calculated from the eight sampling events required by 35 I.A.C. § 845.650(b)(1)(A), to be collected within 180 days from April 21, 2021, were compared to the standards identified in 35 I.A.C. § 845.600(a)(1). For constituents with calculated background concentrations greater than the standards in 35 I.A.C. § 845.600(a)(1), those calculated background concentrations were used as GWPSs. Compliance well statistical calculations from that same time period were compared to the GWPSs to determine potential exceedances.

Corrective Action

No corrective actions are required to remediate the groundwater.

TABLE 1. DETERMINATION OF POTENTIAL EXCEEDANCES

HISTORY OF POTENTIAL EXCEEDANCES
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	HSU	Program	Constituent	Result Unit	Sample Date Range	Statistical Calculation	Statistical Result	GWPS	Background	Part 845 Standard	GWPS Source
12	UA	257	Antimony, total	mg/L	12/09/2015 - 06/23/2021	All ND - Last	0.001	0.006	0.001	0.006	Standard
12	UA	257	Arsenic, total	mg/L	06/22/2015 - 06/23/2021	All ND - Last	0.001	0.010	0.001	0.01	Standard
12	UA	257	Barium, total	mg/L	06/22/2015 - 06/23/2021	CI around mean	0.050	2.0	0.21	2	Standard
12	UA	257	Beryllium, total	mg/L	12/09/2015 - 06/23/2021	All ND - Last	0.001	0.004	0.001	0.004	Standard
12	UA	257	Boron, total	mg/L	06/22/2015 - 06/23/2021	CI around mean	0.36	2.0	0.15	2	Standard
12	UA	257	Cadmium, total	mg/L	06/22/2015 - 06/23/2021	All ND - Last	0.001	0.005	0.0023	0.005	Standard
12	UA	257	Chloride, total	mg/L	06/22/2015 - 06/23/2021	CI around mean	68	396	396	200	Background
12	UA	257	Chromium, total	mg/L	06/22/2015 - 06/23/2021	CI around median	0.001	0.10	0.001	0.1	Standard
12	UA	257	Cobalt, total	mg/L	12/09/2015 - 06/23/2021	All ND - Last	0.001	0.038	0.038	0.006	Background
12	UA	257	Fluoride, total	mg/L	06/22/2015 - 06/23/2021	CB around linear reg	0.25	4.0	0.12	4	Standard
12	UA	257	Lead, total	mg/L	06/22/2015 - 06/23/2021	All ND - Last	0.001	0.0075	0.0015	0.0075	Standard
12	UA	257	Lithium, total	mg/L	12/09/2015 - 06/23/2021	CI around mean	0.012	0.040	0.019	0.04	Standard
12	UA	257	Mercury, total	mg/L	06/22/2015 - 06/23/2021	All ND - Last	0.0002	0.002	0.0002	0.002	Standard
12	UA	257	Molybdenum, total	mg/L	06/22/2015 - 06/23/2021	CI around mean	0.026	0.10	0.0017	0.1	Standard
12	UA	257	pH (field)	SU	03/19/2015 - 06/23/2021	CB around linear reg	7.0	6.5/9.0	6.6/7.5	6.5/9	Standard/Standard
12	UA	257	Radium-226 + Radium 228, tot	pCi/L	12/09/2015 - 03/18/2021	CI around mean	0.34	5.0	1.5	5	Standard
12	UA	257	Selenium, total	mg/L	06/22/2015 - 06/23/2021	CI around median	0.0011	0.050	0.0014	0.05	Standard
12	UA	257	Sulfate, total	mg/L	06/22/2015 - 06/23/2021	CI around mean	64	400	200	400	Standard
12	UA	257	Thallium, total	mg/L	12/09/2015 - 06/23/2021	All ND - Last	0.002	0.002	0.001	0.002	Standard
12	UA	257	Total Dissolved Solids	mg/L	12/09/2015 - 03/18/2021	CI around mean	443	1520	1520	1200	Background
13	UA	257	Antimony, total	mg/L	12/09/2015 - 06/23/2021	All ND - Last	0.001	0.006	0.001	0.006	Standard
13	UA	257	Arsenic, total	mg/L	06/22/2015 - 06/23/2021	CI around median	0.001	0.010	0.001	0.01	Standard
13	UA	257	Barium, total	mg/L	06/22/2015 - 06/23/2021	CI around mean	0.043	2.0	0.21	2	Standard
13	UA	257	Beryllium, total	mg/L	12/09/2015 - 06/23/2021	All ND - Last	0.001	0.004	0.001	0.004	Standard
13	UA	257	Boron, total	mg/L	06/22/2015 - 06/23/2021	CI around mean	0.75	2.0	0.15	2	Standard
13	UA	257	Cadmium, total	mg/L	06/22/2015 - 06/23/2021	All ND - Last	0.001	0.005	0.0023	0.005	Standard

TABLE 1. DETERMINATION OF POTENTIAL EXCEEDANCES

HISTORY OF POTENTIAL EXCEEDANCES
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	HSU	Program	Constituent	Result Unit	Sample Date Range	Statistical Calculation	Statistical Result	GWPS	Background	Part 845 Standard	GWPS Source
13	UA	257	Chloride, total	mg/L	06/22/2015 - 06/23/2021	CI around mean	72	396	396	200	Background
13	UA	257	Chromium, total	mg/L	06/22/2015 - 06/23/2021	CI around median	0.001	0.10	0.001	0.1	Standard
13	UA	257	Cobalt, total	mg/L	12/09/2015 - 06/23/2021	All ND - Last	0.001	0.038	0.038	0.006	Background
13	UA	257	Fluoride, total	mg/L	06/22/2015 - 06/23/2021	CB around linear reg	0.23	4.0	0.12	4	Standard
13	UA	257	Lead, total	mg/L	06/22/2015 - 06/23/2021	All ND - Last	0.001	0.0075	0.0015	0.0075	Standard
13	UA	257	Lithium, total	mg/L	12/09/2015 - 06/23/2021	CI around mean	0.018	0.040	0.019	0.04	Standard
13	UA	257	Mercury, total	mg/L	06/22/2015 - 06/23/2021	All ND - Last	0.0002	0.002	0.0002	0.002	Standard
13	UA	257	Molybdenum, total	mg/L	06/22/2015 - 06/23/2021	CI around geomean	0.015	0.10	0.0017	0.1	Standard
13	UA	257	pH (field)	SU	03/19/2015 - 06/23/2021	CI around mean	7.4	6.5/9.0	6.6/7.5	6.5/9	Standard/Standard
13	UA	257	Radium-226 + Radium 228, tot	pCi/L	12/09/2015 - 03/18/2021	CI around mean	0.38	5.0	1.5	5	Standard
13	UA	257	Selenium, total	mg/L	06/22/2015 - 06/23/2021	CI around mean	0.00181	0.050	0.0014	0.05	Standard
13	UA	257	Sulfate, total	mg/L	06/22/2015 - 06/23/2021	CI around mean	80	400	200	400	Standard
13	UA	257	Thallium, total	mg/L	12/09/2015 - 06/23/2021	All ND - Last	0.002	0.002	0.001	0.002	Standard
13	UA	257	Total Dissolved Solids	mg/L	12/09/2015 - 03/18/2021	CI around mean	480	1520	1520	1200	Background
46	UA	257	Antimony, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.001	0.006	0.001	0.006	Standard
46	UA	257	Arsenic, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.001	0.010	0.001	0.01	Standard
46	UA	257	Barium, total	mg/L	12/09/2015 - 03/18/2021	CB around linear reg	0.058	2.0	0.21	2	Standard
46	UA	257	Beryllium, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.001	0.004	0.001	0.004	Standard
46	UA	257	Boron, total	mg/L	12/09/2015 - 03/18/2021	CI around mean	0.21	2.0	0.15	2	Standard
46	UA	257	Cadmium, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.001	0.005	0.0023	0.005	Standard
46	UA	257	Chloride, total	mg/L	12/09/2015 - 03/18/2021	CI around mean	66	396	396	200	Background
46	UA	257	Chromium, total	mg/L	12/09/2015 - 03/18/2021	CB around linear reg	0.00137	0.10	0.001	0.1	Standard
46	UA	257	Cobalt, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.001	0.038	0.038	0.006	Background
46	UA	257	Fluoride, total	mg/L	12/09/2015 - 03/18/2021	CI around mean	0.25	4.0	0.12	4	Standard
46	UA	257	Lead, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.001	0.0075	0.0015	0.0075	Standard
46	UA	257	Lithium, total	mg/L	12/09/2015 - 03/18/2021	CI around mean	0.00966	0.040	0.019	0.04	Standard

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Sample Location	HSU	Program	Constituent	Result Unit	Sample Date Range	Statistical Calculation	Statistical Result	GWPS	Background	Part 845 Standard	GWPS Source
46	UA	257	Mercury, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.0002	0.002	0.0002	0.002	Standard
46	UA	257	Molybdenum, total	mg/L	12/09/2015 - 03/18/2021	CB around T-S line	0.014	0.10	0.0017	0.1	Standard
46	UA	257	pH (field)	SU	12/09/2015 - 03/18/2021	CI around mean	7.3	6.5/9.0	6.6/7.5	6.5/9	Standard/Standard
46	UA	257	Radium-226 + Radium 228, tot	pCi/L	12/09/2015 - 03/18/2021	CI around geomean	0.25	5.0	1.5	5	Standard
46	UA	257	Selenium, total	mg/L	12/09/2015 - 03/18/2021	CI around median	0.001	0.050	0.0014	0.05	Standard
46	UA	257	Sulfate, total	mg/L	12/09/2015 - 03/18/2021	CI around mean	60	400	200	400	Standard
46	UA	257	Thallium, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.002	0.002	0.001	0.002	Standard
46	UA	257	Total Dissolved Solids	mg/L	12/09/2015 - 03/18/2021	CI around mean	430	1520	1520	1200	Background
47	UA	257	Antimony, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.001	0.006	0.001	0.006	Standard
47	UA	257	Arsenic, total	mg/L	12/09/2015 - 03/18/2021	Most recent sample	0.001	0.010	0.001	0.01	Standard
47	UA	257	Barium, total	mg/L	12/09/2015 - 03/18/2021	CI around mean	0.074	2.0	0.21	2	Standard
47	UA	257	Beryllium, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.001	0.004	0.001	0.004	Standard
47	UA	257	Boron, total	mg/L	12/09/2015 - 03/18/2021	CI around geomean	0.18	2.0	0.15	2	Standard
47	UA	257	Cadmium, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.001	0.005	0.0023	0.005	Standard
47	UA	257	Chloride, total	mg/L	12/09/2015 - 03/18/2021	CI around mean	70	396	396	200	Background
47	UA	257	Chromium, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.0015	0.10	0.001	0.1	Standard
47	UA	257	Cobalt, total	mg/L	12/09/2015 - 03/18/2021	Future median	0.001	0.038	0.038	0.006	Background
47	UA	257	Fluoride, total	mg/L	12/09/2015 - 03/18/2021	CB around linear reg	0.24	4.0	0.12	4	Standard
47	UA	257	Lead, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.001	0.0075	0.0015	0.0075	Standard
47	UA	257	Lithium, total	mg/L	12/09/2015 - 03/18/2021	CI around mean	0.00812	0.040	0.019	0.04	Standard
47	UA	257	Mercury, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.0002	0.002	0.0002	0.002	Standard
47	UA	257	Molybdenum, total	mg/L	12/09/2015 - 03/18/2021	CB around linear reg	0.015	0.10	0.0017	0.1	Standard
47	UA	257	pH (field)	SU	12/09/2015 - 03/18/2021	CI around mean	7.0	6.5/9.0	6.6/7.5	6.5/9	Standard/Standard
47	UA	257	Radium-226 + Radium 228, tot	pCi/L	12/09/2015 - 03/18/2021	CI around mean	0.26	5.0	1.5	5	Standard
47	UA	257	Selenium, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.001	0.050	0.0014	0.05	Standard
47	UA	257	Sulfate, total	mg/L	12/09/2015 - 03/18/2021	CI around mean	60	400	200	400	Standard

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Sample Location	HSU	Program	Constituent	Result Unit	Sample Date Range	Statistical Calculation	Statistical Result	GWPS	Background	Part 845 Standard	GWPS Source
47	UA	257	Thallium, total	mg/L	12/09/2015 - 03/18/2021	All ND - Last	0.002	0.002	0.001	0.002	Standard
47	UA	257	Total Dissolved Solids	mg/L	12/09/2015 - 03/18/2021	CI around mean	456	1520	1520	1200	Background
52	UA	845	Antimony, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.001	0.006	0.001	0.006	Standard
52	UA	845	Arsenic, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.001	0.010	0.001	0.01	Standard
52	UA	845	Barium, total	mg/L	02/24/2021 - 08/03/2021	CI around mean	0.066	2.0	0.21	2	Standard
52	UA	845	Beryllium, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.001	0.004	0.001	0.004	Standard
52	UA	845	Boron, total	mg/L	02/24/2021 - 08/03/2021	CI around mean	0.11	2.0	0.16	2	Standard
52	UA	845	Cadmium, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.001	0.005	0.0023	0.005	Standard
52	UA	845	Chloride, total	mg/L	02/24/2021 - 08/03/2021	CI around mean	64	435	435	200	Background
52	UA	845	Chromium, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.0015	0.10	0.001	0.1	Standard
52	UA	845	Cobalt, total	mg/L	02/24/2021 - 08/03/2021	Most recent sample	0.001	0.038	0.038	0.006	Background
52	UA	845	Fluoride, total	mg/L	02/24/2021 - 08/03/2021	CI around mean	0.28	4.0	0.12	4	Standard
52	UA	845	Lead, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.001	0.0075	0.0015	0.0075	Standard
52	UA	845	Lithium, total	mg/L	02/24/2021 - 08/03/2021	CI around mean	0.00583	0.040	0.019	0.04	Standard
52	UA	845	Mercury, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.0002	0.002	0.0002	0.002	Standard
52	UA	845	Molybdenum, total	mg/L	02/24/2021 - 08/03/2021	CI around mean	0.00891	0.10	0.0017	0.1	Standard
52	UA	845	pH (field)	SU	02/24/2021 - 08/03/2021	CI around mean	6.9	6.5/9.0	6.6/7.5	6.5/9	Standard/Standard
52	UA	845	Radium-226 + Radium 228, tot	pCi/L	02/24/2021 - 08/03/2021	CI around mean	0.25	5.0	2.0	5	Standard
52	UA	845	Selenium, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.001	0.050	0.0014	0.05	Standard
52	UA	845	Sulfate, total	mg/L	02/24/2021 - 08/03/2021	CI around mean	56	400	215	400	Standard
52	UA	845	Thallium, total	mg/L	02/24/2021 - 08/03/2021	CI around median	0.001	0.002	0.001	0.002	Standard
52	UA	845	Total Dissolved Solids	mg/L	02/24/2021 - 08/03/2021	CI around mean	397	1620	1620	1200	Background
53	UA	845	Antimony, total	mg/L	02/25/2021 - 05/06/2021	All ND - Last	0.002	0.006	0.001	0.006	Standard
53	UA	845	Arsenic, total	mg/L	02/25/2021 - 05/06/2021	All ND - Last	0.001	0.010	0.001	0.01	Standard
53	UA	845	Barium, total	mg/L	02/25/2021 - 05/06/2021	CI around median	0	2.0	0.21	2	Standard
53	UA	845	Beryllium, total	mg/L	02/25/2021 - 05/06/2021	All ND - Last	0.001	0.004	0.001	0.004	Standard

TABLE 1. DETERMINATION OF POTENTIAL EXCEEDANCES

HISTORY OF POTENTIAL EXCEEDANCES
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	HSU	Program	Constituent	Result Unit	Sample Date Range	Statistical Calculation	Statistical Result	GWPS	Background	Part 845 Standard	GWPS Source
53	UA	845	Boron, total	mg/L	02/25/2021 - 05/06/2021	CI around mean	0.074	2.0	0.16	2	Standard
53	UA	845	Cadmium, total	mg/L	02/25/2021 - 05/06/2021	CI around mean	0.000671	0.005	0.0023	0.005	Standard
53	UA	845	Chloride, total	mg/L	02/25/2021 - 05/06/2021	CI around mean	90	435	435	200	Background
53	UA	845	Chromium, total	mg/L	02/25/2021 - 05/06/2021	All ND - Last	0.001	0.10	0.001	0.1	Standard
53	UA	845	Cobalt, total	mg/L	02/25/2021 - 05/06/2021	Future median	0.0074	0.038	0.038	0.006	Background
53	UA	845	Fluoride, total	mg/L	02/25/2021 - 05/06/2021	CI around mean	0.22	4.0	0.12	4	Standard
53	UA	845	Lead, total	mg/L	02/25/2021 - 05/06/2021	CI around mean	0.0000651	0.0075	0.0015	0.0075	Standard
53	UA	845	Lithium, total	mg/L	02/25/2021 - 05/06/2021	CI around mean	-0.00176	0.040	0.019	0.04	Standard
53	UA	845	Mercury, total	mg/L	02/25/2021 - 05/06/2021	All ND - Last	0.0002	0.002	0.0002	0.002	Standard
53	UA	845	Molybdenum, total	mg/L	02/25/2021 - 05/06/2021	CI around mean	0.00428	0.10	0.0017	0.1	Standard
53	UA	845	pH (field)	SU	02/25/2021 - 05/06/2021	CI around mean	6.7	6.5/9.0	6.6/7.5	6.5/9	Standard/Standard
53	UA	845	Radium-226 + Radium 228, tot	pCi/L	02/25/2021 - 05/06/2021	CI around mean	-0.249	5.0	2.0	5	Standard
53	UA	845	Selenium, total	mg/L	02/25/2021 - 05/06/2021	All ND - Last	0.001	0.050	0.0014	0.05	Standard
53	UA	845	Sulfate, total	mg/L	02/25/2021 - 05/06/2021	CI around mean	59	400	215	400	Standard
53	UA	845	Thallium, total	mg/L	02/25/2021 - 05/06/2021	All ND - Last	0.001	0.002	0.001	0.002	Standard
53	UA	845	Total Dissolved Solids	mg/L	02/25/2021 - 05/06/2021	CI around mean	433	1620	1620	1200	Background
54	UA	845	Antimony, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.001	0.006	0.001	0.006	Standard
54	UA	845	Arsenic, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.001	0.010	0.001	0.01	Standard
54	UA	845	Barium, total	mg/L	02/24/2021 - 08/03/2021	CB around linear reg	0.048	2.0	0.21	2	Standard
54	UA	845	Beryllium, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.001	0.004	0.001	0.004	Standard
54	UA	845	Boron, total	mg/L	02/24/2021 - 08/03/2021	CI around mean	0.64	2.0	0.16	2	Standard
54	UA	845	Cadmium, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.001	0.005	0.0023	0.005	Standard
54	UA	845	Chloride, total	mg/L	02/24/2021 - 08/03/2021	CI around mean	78	435	435	200	Background
54	UA	845	Chromium, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.0015	0.10	0.001	0.1	Standard
54	UA	845	Cobalt, total	mg/L	02/24/2021 - 08/03/2021	Future median	0.001	0.038	0.038	0.006	Background
54	UA	845	Fluoride, total	mg/L	02/24/2021 - 08/03/2021	CI around mean	0.32	4.0	0.12	4	Standard

TABLE 1. DETERMINATION OF POTENTIAL EXCEEDANCES

HISTORY OF POTENTIAL EXCEEDANCES
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	HSU	Program	Constituent	Result Unit	Sample Date Range	Statistical Calculation	Statistical Result	GWPS	Background	Part 845 Standard	GWPS Source
54	UA	845	Lead, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.001	0.0075	0.0015	0.0075	Standard
54	UA	845	Lithium, total	mg/L	02/24/2021 - 08/03/2021	CI around mean	0.014	0.040	0.019	0.04	Standard
54	UA	845	Mercury, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.0002	0.002	0.0002	0.002	Standard
54	UA	845	Molybdenum, total	mg/L	02/24/2021 - 08/03/2021	CB around linear reg	0.012	0.10	0.0017	0.1	Standard
54	UA	845	pH (field)	SU	02/24/2021 - 08/03/2021	CI around mean	6.8	6.5/9.0	6.6/7.5	6.5/9	Standard/Standard
54	UA	845	Radium-226 + Radium 228, tot	pCi/L	02/24/2021 - 08/03/2021	CI around geomean	0.14	5.0	2.0	5	Standard
54	UA	845	Selenium, total	mg/L	02/24/2021 - 08/03/2021	CI around median	0.001	0.050	0.0014	0.05	Standard
54	UA	845	Sulfate, total	mg/L	02/24/2021 - 08/03/2021	CI around mean	72	400	215	400	Standard
54	UA	845	Thallium, total	mg/L	02/24/2021 - 08/03/2021	All ND - Last	0.002	0.002	0.001	0.002	Standard
54	UA	845	Total Dissolved Solids	mg/L	02/24/2021 - 08/03/2021	CI around mean	477	1620	1620	1200	Background
55	BR	845	Antimony, total	mg/L	02/25/2021 - 08/03/2021	All ND - Last	0.001	0.006	0.001	0.006	Standard
55	BR	845	Arsenic, total	mg/L	02/25/2021 - 08/03/2021	CI around mean	0.000438	0.010	0.001	0.01	Standard
55	BR	845	Barium, total	mg/L	02/25/2021 - 08/03/2021	CI around mean	0.061	2.0	0.21	2	Standard
55	BR	845	Beryllium, total	mg/L	02/25/2021 - 08/03/2021	All ND - Last	0.001	0.004	0.001	0.004	Standard
55	BR	845	Boron, total	mg/L	02/25/2021 - 08/03/2021	CI around mean	0.35	2.0	0.16	2	Standard
55	BR	845	Cadmium, total	mg/L	02/25/2021 - 08/03/2021	All ND - Last	0.001	0.005	0.0023	0.005	Standard
55	BR	845	Chloride, total	mg/L	02/25/2021 - 08/03/2021	CI around mean	132	435	435	200	Background
55	BR	845	Chromium, total	mg/L	02/25/2021 - 08/03/2021	CI around mean	-0.00509	0.10	0.001	0.1	Standard
55	BR	845	Cobalt, total	mg/L	02/25/2021 - 08/03/2021	Future median	0.001	0.038	0.038	0.006	Background
55	BR	845	Fluoride, total	mg/L	02/25/2021 - 08/03/2021	CI around mean	0.24	4.0	0.12	4	Standard
55	BR	845	Lead, total	mg/L	02/25/2021 - 08/03/2021	CI around median	0	0.0075	0.0015	0.0075	Standard
55	BR	845	Lithium, total	mg/L	02/25/2021 - 08/03/2021	CI around mean	0.023	0.040	0.019	0.04	Standard
55	BR	845	Mercury, total	mg/L	02/25/2021 - 08/03/2021	All ND - Last	0.0002	0.002	0.0002	0.002	Standard
55	BR	845	Molybdenum, total	mg/L	02/25/2021 - 08/03/2021	CI around mean	0.00217	0.10	0.0017	0.1	Standard
55	BR	845	pH (field)	SU	02/25/2021 - 08/03/2021	CI around mean	7.0	6.5/9.0	6.6/7.5	6.5/9	Standard/Standard
55	BR	845	Radium-226 + Radium 228, tot	pCi/L	02/25/2021 - 08/03/2021	CI around mean	-0.147	5.0	2.0	5	Standard

TABLE 1. DETERMINATION OF POTENTIAL EXCEEDANCES

HISTORY OF POTENTIAL EXCEEDANCES
 HENNEPIN POWER PLANT
 EAST ASH POND
 HENNEPIN, ILLINOIS

Sample Location	HSU	Program	Constituent	Result Unit	Sample Date Range	Statistical Calculation	Statistical Result	GWPS	Background	Part 845 Standard	GWPS Source
55	BR	845	Selenium, total	mg/L	02/25/2021 - 08/03/2021	All ND - Last	0.001	0.050	0.0014	0.05	Standard
55	BR	845	Sulfate, total	mg/L	02/25/2021 - 08/03/2021	CI around mean	22	400	215	400	Standard
55	BR	845	Thallium, total	mg/L	02/25/2021 - 08/03/2021	All ND - Last	0.002	0.002	0.001	0.002	Standard
55	BR	845	Total Dissolved Solids	mg/L	02/25/2021 - 08/03/2021	CI around mean	542	1620	1620	1200	Background

Notes:

Potential exceedance of GWPS (note: No potential exceedances were determined based on data collected from 2015 through 2021)

HSU = hydrostratigraphic unit:

BR = bedrock

UA = uppermost aquifer

Program = regulatory program data were collected under:

257 = 40 C.F.R. Part 257 Subpart D (Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments)

845 = 35 I.A.C. Part 845 (Sampling events completed to assess well locations for inclusion in the Part 845 monitoring well network)

mg/L = milligrams per liter

pCi/L = picocuries per liter

SU = standard units

Statistical Calculation = method used to calculate the statistical result:

All ND - Last = All results were below the reporting limit, and the last determined reporting limit is shown

CB around linear reg = Confidence band around linear regression

CB around T-S line = Confidence band around Thiel-Sen line

CI around geomean = Confidence interval around the geometric mean

CI around mean = Confidence interval around the mean

CI around median = Confidence interval around the median

Future median = Median of the three most recent samples

Most recent sample = Result for the most recently collected sample used due to insufficient data

Statistical Result = calculated in accordance with Statistical Analysis Plan using constituent concentrations observed at monitoring well during all sampling events within the specified date range

For pH, the values presented are the lower / upper limits

GWPS = Groundwater Protection Standard

GWPS Source:

Standard = standard specified in 35 I.A.C. § 845.600(a)(1)

Background = background concentration (see cover page for additional information)

ATTACHMENT N

Certification of Financial Assurance Requirements

On June 17, 2021, Dynegy Midwest Generation, LLC provided financial assurance in the form of performance bonds to the Illinois Environmental Protection Agency in the amount of \$ 9,382,670 for the West Ash Pond System, East Ash Pond 2, East New Primary Pond, and East Pond 4 at the Hennepin Power Plant.¹

I, Matthew A. Goering, Senior Vice President of Dynegy Midwest Generation, LLC, do hereby certify to the best of my knowledge for the above referenced CCR Units that the financial assurance instruments satisfy the requirements of 35 I.A.C. Part 845, Subpart I.



Matthew A. Goering
Senior Vice President
Dynegy Midwest Generation, LLC

¹ In the operating permit applications, the West Ash Pond System is referred to as the Old West Ash Pond (Pond No. 1 and No. 3) and Old West Polishing Pond, the East Ash Pond 2 and East Pond 4 are referred to as Ash Ponds 2 & 4, and the East New Primary Pond is referred to as the East Ash Pond.

ATTACHMENT O



Stantec Consulting Services Inc.
1859 Bowles Avenue Suite 250, Fenton MO 63026-1944

October 12, 2016
File: let_017_175666013_certification
Revision 0

Initial Hazard Potential Classification Assessment
EPA Final CCR Rule
East Ash Pond
Hennepin Power Station
Putnam County, Illinois

1.0 PURPOSE

This report documents Stantec's certification of the initial hazard potential classification assessment for the Hennepin Power Station East Ash Pond.

40 CFR 257.73(a)(2) requires the owner or operator of an existing CCR surface impoundment to conduct an initial hazard potential classification assessment and document the hazard potential classification, and the basis for the classification, of the CCR unit as either a high hazard potential CCR surface impoundment, a significant hazard potential CCR surface impoundment, or a low hazard potential CCR surface impoundment.

2.0 FINDINGS

A visual analysis was performed to evaluate potential hazards associated with a failure of the East Ash Pond perimeter containment dike. Failure scenarios were considered along the perimeter dike and specifically at two locations. These two locations are located at the east and northeast embankments of the perimeter dike. The remainder of the impoundment is bordered by higher ground, so it is unlikely that a breach would occur in this direction. A breach failure of the dike at the two locations was evaluated for potential downstream impacts to structures, infrastructure, frequently occupied facilities/areas, and waterways. Potential for impacts was evaluated by determining probable breach flow paths using available elevation data and imagery of the impoundment and nearby area.

The analysis indicated that none of the breach scenarios appear to impact structures. A breach of the east embankment could impact an intermittently-used access road to the power station and East Polishing Pond, and a breach to the northeast could impact Leachate Pond. Both receiving ponds are on-site. A breach failure of the containment dike would not likely result in probable loss of human life. However, breach of the impoundment could cause stored CCR materials to be released into the Illinois River, which can cause environmental damage to downstream areas.

40 CFR 257.53 defines a "significant hazard potential CCR surface impoundment" as a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.

Design with community in mind



Based on the results of the analysis summarized above, East Ash Pond was assigned a Significant hazard potential classification per 40 CFR 257.53.

3.0 QUALIFIED PROFESSIONAL ENGINEER CERTIFICATION

I, Matthew Hoy, being a Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief that;

1. the information contained in this report and the underlying data in the operating record was prepared in accordance with the accepted practice of engineering and is accurate as of the date of my signature below; and
2. the initial hazard potential classification assessment for the Hennepin Power Station East Ash Pond was conducted in accordance with the requirements specified in 40 CFR 257.73.

SIGNATURE

DATE

10/12/2016

ADDRESS:

Stantec Consulting Services Inc.
1859 Bowles Avenue Suite 250
Fenton MO 63026-1944

TELEPHONE:

(636) 343-3880



Design with community in mind



Documentation of Initial
Hazard Potential
Classification
Assessment

East Ash Pond
Hennepin Power Station
Hennepin, Illinois

Table of Contents

Section	Page No.
Executive Summary	1
1. Introduction	2
1.1. Background	2
1.2. Location.....	2
2. Source Data	2
3. Potential Failure Scenarios	3
3.1. Unit Description.....	3
3.2. Failure Scenarios.....	3
3.2.1. East	3
3.2.2. Northeast	3
4. Hazard Classification	4
5. References	4

List of Appendixes

Appendix A Site Overview Figure

Executive Summary

This report documents the hazard potential classification assessment for the East Ash Pond at the Hennepin Power Station as required per the Coal Combustion Residuals (CCR) Rule in 40 C.F.R. § 257.73(a)(2). The applicable hazard potential classifications are defined in 40 C.F.R. § 257.53 as follows:

- (1) High hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation will probably cause loss of human life.
- (2) Significant hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.
- (3) Low hazard potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the surface impoundment owner's property.

Based on these definitions and the analysis herein, the East Ash Pond is classified as a Significant hazard potential CCR surface impoundment.

This report contains supporting documentation for the hazard potential classification assessment. The hazard potential classification for this CCR unit was determined by a visual assessment conducted by Stantec in August, 2016.

1. Introduction

1.1. Background

The CCR Rule was published in the Federal Register on April 17, 2015. The Rule requires that a hazard potential classification assessment be performed for existing CCR surface impoundments that are not incised. A previously completed assessment may be used in lieu of the initial assessment provided the previous hazard assessment was completed no earlier than April 17, 2013. The applicable hazard potential classifications are defined in the CCR Rule 40 C.F.R. § 257.53 as follows:

High Hazard Potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation will probably cause loss of human life.

Significant Hazard Potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.

Low Hazard Potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the surface impoundment owner's property.

Dynegy has contracted Stantec Consulting Services Inc. (Stantec) to prepare hazard potential classification assessments for selected impoundments¹.

It was determined that there was no existing available hazard potential classification assessment documentation for the East Ash Pond.

1.2. Location

Hennepin Power Station is located in Hennepin, Illinois along the east bank of the Illinois River in Putnam County approximately 100 miles southwest of Chicago. East Ash Pond is located to the east of the power station. A site overview figure is included in Appendix A.

2. Source Data

The following information was used to perform the hazard assessment of East Ash Pond:

¹ Dynegy Administrative Services Company (Dynegy) contracted Stantec on behalf of the Hennepin Power Station owner, Dynegy Midwest Generation, LLC. Thus, Dynegy is referenced in this report.

- Aerial Imagery (dated August 17, 2015)
- Topographic and Bathymetric Survey Information (from Weaver Consultants Group dated September 22, 2016)
- Digital Surface Model (from Illinois State Geological Survey dated December, 2011)

3. Potential Failure Scenarios

3.1. Unit Description

East Ash Pond has a 3.5 acre surface area, and according to available topographic and bathymetric information, the impoundment measures approximately 18 feet from the bottom to the overflow elevation. East Ash Pond discharges to East Polishing Pond through a 36-inch diameter culvert and to Leachate Pond through a 18-inch diameter culvert. East Ash Pond could also overtop east into East Polishing Pond. East Ash Pond has an overtopping elevation of approximately 494 feet.

3.2. Failure Scenarios

East Ash Pond is adjacent to a landfill to the north and an off-site area to the south. Due to these areas being higher ground, a breach in these directions was not evaluated. The west half of East Ash Pond is 3 to 4 feet higher than the overtopping length of the pond; therefore, a breach in this direction was also not evaluated. The impoundment could potentially fail towards Leachate Pond to the northeast and East Polishing Pond to the east. Two failure scenarios were evaluated as summarized below.

3.2.1. East

A failure of the impoundment to the east would discharge flow over an access road into East Polishing Pond. The access road is typically intermittently used by Hennepin Power Station personnel and the at-risk populations are considered transient. In accordance with Federal guidelines, loss of life is not considered probable for scenarios where persons are only temporarily in the potential inundation area (Reference 2). This receiving pond is on-site and would discharge to the Illinois River if overtopped. Given the relative size of the river in comparison to East Polishing Pond, overtopping in this direction would likely be contained to the river and not impact adjacent land.

3.2.2. Northeast

A failure of the impoundment to the northeast would discharge into Leachate Pond. This receiving pond is on-site and flow could potentially overtop into the Illinois River. Given the relative size of the river, overtopping in this direction would likely be contained to the river and not impact adjacent land.

4. Hazard Classification

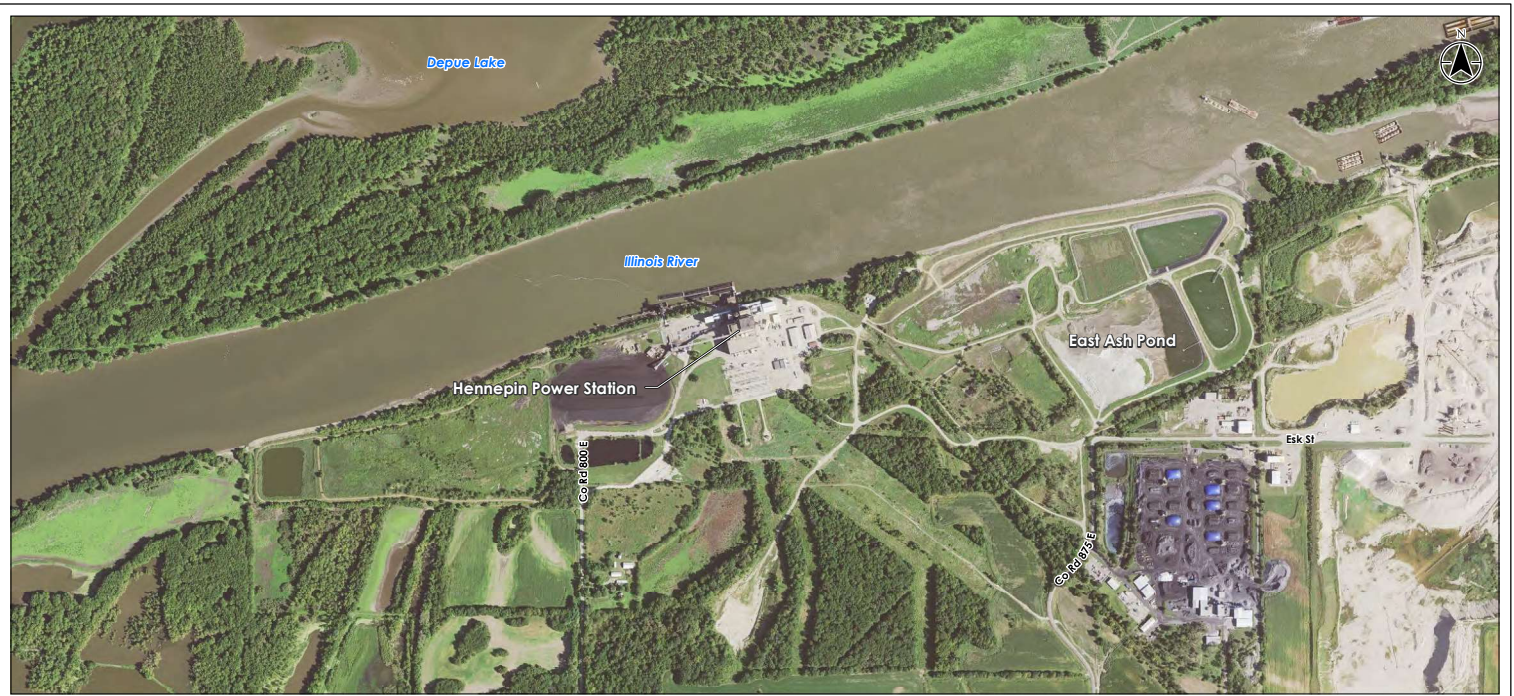
Due to the limited potential impacts to Dynegy property and/or transient nature of potential at-risk populations, it is Stantec's opinion that a breach of East Ash Pond does not represent a probable threat to human life. However, a breach failure of the containment dike could result in the release of the stored CCR materials into the Illinois River, which can cause environmental damage. Therefore, the impoundment fits the definition for a Significant hazard potential CCR surface impoundment (as defined in the CCR Rule §257.53).

5. References

1. EPA Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities, 40 CFR § 257 and § 261 (effective April 17, 2015).
2. Federal Emergency Management Agency (FEMA). (2004). Hazard Potential Classification System for Dams.

Appendix A

Site Overview Figure



0 1,000 Feet
1:12,000 (A1 original document size of 11x17)



Project Location 175405019
Latitude: 41.322973 Prepared by: MFW on 2016-10-05
Longitude: -89.315035 Technical Review by: HS on 2016-10-05
Polk County, Wis. Independent Review by: KRF on 2016-10-05

Client/Project
Dynegy
Hennepin Power Station
Hazard Potential Classification Assessment

Figure No.

1

Site
Site Overview Figure
East Ash Pond
Hennepin Power Station

Notes
1. Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere
2. Aerial Source: 2015 NAIP Imagery
3. Impoundment Boundaries Provided by Client (Dated 9/9/2015)

Disclaimer: Stantec assumes no responsibility for data supplied in electronic format. The recipient accepts full responsibility for verifying the accuracy and completeness of the data. The recipient releases Stantec, its officers, employees, consultants and agents, from any and all claims arising in any way from the content or provision of the data.

ATTACHMENT P



Submitted to
Dynergy Midwest Generation,
LLC
1500 Eastport Plaza Drive
Collinsville, IL 62234

Submitted by
AECOM
1001 Highlands Plaza Drive West
Suite 300
St. Louis, MO 63110

October 2016

CCR Rule Report: Initial Structural Stability Assessment

For

East Ash Pond

At Hennepin Power Station

1 Introduction

This Coal Combustion Residual (CCR) Rule Report documents that the East Ash Pond at the Dynegy Midwest Generation, LLC Hennepin Power Station meets the structural stability assessment requirements specified in 40 Code of Federal Regulations (CFR) §257.73(d), except as noted herein. The East Ash Pond is located near Hennepin, Illinois in Putnam County, approximately 0.4 miles east of the Hennepin Power Station. The East Ash Pond serves as the wet impoundment basin for CCR material produced by the Hennepin Power Station.

The East Ash Pond is an existing CCR surface impoundment as defined by 40 CFR §257.53. The CCR Rule requires that an initial structural stability assessment for an existing CCR surface impoundment be completed by October 17, 2016. In general, the initial structural stability assessment must document that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices.

The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer stating that the initial structural stability assessment was conducted in accordance with the requirements of 40 CFR § 257.73(d). The owner or operator must prepare a periodic structural stability assessment every five years.

2 Initial Structural Stability Assessment

40 CFR §257.73(d)(1)

The owner or operator of the CCR unit must conduct initial and periodic structural stability assessments and document whether the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering practices for the maximum volume of CCR and CCR wastewater which can be impounded therein. The assessment must, at a minimum, document whether the CCR unit has been designed, constructed, operated, and maintained with [the standards in (d)(1)(i)-(vii)].

An initial structural stability assessment has been performed to document that the design, construction, operation and maintenance of the East Ash Pond is consistent with recognized and generally accepted good engineering practices. The results of the structural stability assessment are discussed in the following sections. Based on the assessment and its results, the design, construction, operation, and maintenance of the East Ash Pond were found to be consistent with recognized and generally accepted good engineering practices, and meets the standards in 257.73(d)(1)(i)-(vii), except as noted herein.

2.1 Foundations and Abutments (§257.73(d)(1)(i))

CCR unit designed, constructed, operated, and maintained with stable foundations and abutments.

The stability of the foundations and abutments was evaluated using soil data from field investigations and reviewing design drawings, operational and maintenance procedures, and conditions observed in the field by AECOM. Additionally, slope stability analyses were performed to evaluate slip surfaces passing through the foundations.

The foundation consists of medium dense to very dense soil, which indicates stable foundations. Slope stability analyses exceed the criteria listed in §257.73(e)(1) for slip surfaces passing through the foundation. The slope stability analyses are discussed in the *CCR Rule Report: Initial Safety Factor Assessment for East Ash Pond at Hennepin Power Station* (October 2016). A review of operational and maintenance procedures as well as current and past performance of the dikes has determined appropriate processes are in place for continued operational performance.

Based on the conditions observed by AECOM, the East Ash Pond was designed and constructed with stable foundations. Operational and maintenance procedures are in place to address any issues related to the stability of foundations. Therefore, the East Ash Pond meets the requirements in §257.73(d)(1)(i).

2.2 Slope Protection (§257.73(d)(1)(ii))

CCR unit designed, constructed, operated, and maintained with adequate slope protection to protect against surface erosion, wave action and adverse effects of sudden drawdown.

The adequacy of slope protection was evaluated by reviewing design drawings, operational and maintenance procedures, and conditions observed in the field by AECOM.

Based on this evaluation, adequate slope protection was designed and constructed at the East Ash Pond. No evidence of significant areas of erosion or wave action was observed. The interior slopes are protected with a geomembrane liner. The exterior slopes are adjacent to the pool level of the downstream East Leachate Pond and East Polishing Pond non-CCR units and either a geomembrane liner (East Leachate Pond) or riprap (East Polishing Pond) is present as slope protection. Vegetation is present on the exterior slopes above the liner and

riprap. The geomembrane liner on the interior and exterior slopes isolates the embankment soils from surface erosion or wave action. Operational and maintenance procedures to repair the vegetation, liner, and riprap as needed are appropriate to protect against surface erosion or wave action. Given the presence of a liner that serves to prevent saturation of the dike's soils below the normal pool, sudden drawdown, as well as the corresponding adverse effects, is not applicable to the interior slopes East Ash Pond and the exterior slopes adjacent to the East Leachate Pond. Sudden drawdown of the exterior slopes adjacent to the East Polishing Pond is not expected to occur due to operational controls associated with the East Polishing Pond, and therefore slope protection to protect against sudden drawdown is not required for the slopes adjacent to the East Polishing Pond. Therefore, the East Ash Pond meets the requirements in §257.73(d)(1)(ii).

2.3 Dike Compaction (§257.73(d)(1)(iii))

CCR unit designed, constructed, operated, and maintained with dikes mechanically compacted to a density sufficient to withstand the range of loading conditions in the CCR unit.

The density of the dike materials was evaluated using soil data from field investigations and reviewing design drawings, operational and maintenance procedures, and conditions observed in the field by AECOM. Additionally, slope stability analyses were performed to evaluate slip surfaces passing through the dike over the range of expected loading conditions as defined within §257.73(e)(1).

Based on this evaluation, the dike consists of stiff to hard material, which is indicative of mechanically compacted dikes. Slope stability analyses exceed the criteria listed in §257.73(e)(1) for slip surfaces passing through the dike. The slope stability analyses are discussed in the *CCR Rule Report: Initial Safety Factor Assessment for East Ash Pond at Hennepin Power Station* (October 2016); therefore, the original design and construction of the East Ash Pond included sufficient density and dike compaction. Operational and maintenance procedures are in place to identify and mitigate deficiencies in order to maintain sufficient compaction of the dikes to withstand the range of loading conditions. Therefore, the East Ash Pond meets the requirements in §257.73(d)(1)(iii).

2.4 Vegetated Slopes (§257.73(d)(1)(iv))¹

CCR unit designed, constructed, operated, and maintained with vegetated slopes of dikes and surrounding areas, except for slopes which have an alternate form or forms of slope protection.

The adequacy of slope vegetation was evaluated by reviewing design drawings, operational and maintenance procedures, and conditions observed in the field by AECOM.

Based on this evaluation, the vegetation on the exterior slopes is adequate as no substantial bare or overgrown areas were observed. Exposed geomembrane liners on the interior and exterior slopes, and riprap on the exterior slopes are used as an alternate form of slope protection, which is adequate as significant tears, defects, or areas of erosion were not observed. Therefore, the original design and construction of the East Ash Pond included adequate vegetation of the dikes and surrounding areas. Adequate operational and maintenance procedures are in place to regularly manage vegetation growth, including mowing and seeding any bare areas, as evidenced by the conditions observed by AECOM. Therefore, the East Ash Pond meets the requirements in §257.73(d)(1)(iv).

¹ As modified by court order issued June 14, 2016, *Utility Solid Waste Activities Group v. EPA*, D.C. Cir. No. 15-1219 (order granting remand and vacatur of specific regulatory provisions).

2.5 Spillways (§257.73(d)(1)(v))

CCR unit designed, constructed, operated, and maintained with a single spillway or a combination of spillways configured as specified in [paragraph (A) and (B)]:

(A) All spillways must be either:

- (1) of non-erodible construction and designed to carry sustained flows; or*
- (2) earth- or grass-lined and designed to carry short-term, infrequent flows at non-erosive velocities where sustained flows are not expected.*

(B) The combined capacity of all spillways must adequately manage flow during and following the peak discharge from a:

- (1) Probable maximum flood (PMF) for a high hazard potential CCR surface impoundment; or*
- (2) 1000-year flood for a significant hazard potential CCR surface impoundment; or*
- (3) 100-year flood for a low hazard potential CCR surface impoundment.*

The spillways were evaluated using design drawings, operational and maintenance procedures, and conditions observed in the field by AECOM. Additionally, hydrologic and hydraulic analyses were completed to evaluate the capacity of the spillways relative to inflow estimated for the 1,000-year flood event for the significant hazard potential East Ash Pond. The hazard potential classification assessment was performed by Stantec in 2016 in accordance with §257.73(a)(2).

The spillways are comprised of a reinforced concrete pipe primary spillway and a secondary spillway consisting of a concrete riser and reinforced concrete outlet pipe, which are non-erodible materials designed to carry sustained flows. The capacity of the spillways was evaluated using hydrologic and hydraulic analysis performed per §257.82(a). The analysis found that the spillways can adequately manage flow during peak discharge resulting from the 1,000-year storm event without overtopping of the embankments. The hydrologic and hydraulic analyses are discussed in the *CCR Rule Report: Initial Inflow Design Flood Control System Plan for East Ash Pond at Hennepin Power Station* (October 2016). Operational and maintenance procedures are in place to repair any issues with the spillways and remove debris or other obstructions from the spillway, as evidenced by the conditions observed by AECOM. As a result, these procedures are appropriate for maintaining the spillways. Therefore, the East Ash Pond meets the requirements in §257.73(d)(1)(v).

2.6 Stability and Structural Integrity of Hydraulic Structures (§257.73(d)(1)(vi))

CCR unit designed, constructed, operated, and maintained with hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit that maintain structural integrity and are free of significant deterioration, deformation, distortion, bedding deficiencies, sedimentation, and debris which may negatively affect the operation of the hydraulic structure.

Two hydraulic structures pass through the dike at the East Ash Pond: the reinforced concrete pipe primary spillway and reinforced concrete pipe secondary spillway. The stability and structural integrity of the pipes was evaluated using design drawings, operational and maintenance procedures, inspections, and conditions observed in the field by AECOM. No other hydraulic structures are known to pass through the dike of or underlie the base of the East Ash Pond.

A closed-circuit television (CCTV) pipe inspection of the primary spillway was performed and covered the complete length of the pipe and found the pipe to be free of significant deterioration, deformation, distortion, bedding deficiencies, sedimentation, and debris that may negatively affect the operation of the hydraulic structure. Evaluation of design drawings and operational and maintenance procedures for this pipe also did not identify any issues.

The evaluation of design drawings and operational and maintenance procedures and conditions observed in the field did not identify any issues with the secondary spillway pipe. However, the evaluation of the stability and structural integrity of the secondary spillway has not been fully completed because the pipe is full of water, which is required for operation of the Hennepin Power Station and precluded CCTV inspection.

Based on this evaluation, all East Ash Pond hydraulic structures cannot be certified to meet the requirements of §257.73(d)(1)(vi) because a CCTV inspection of the secondary spillway pipe has not yet been performed, thus, precluding completion of the evaluation of the stability and structural integrity of that pipe. In accordance with §257.73(d)(2), AECOM recommends that a CCTV pipe inspection of the secondary spillway be completed as soon as feasible and that this assessment be updated once the inspection is completed.

2.7 Downstream Slope Inundation/Stability (§257.73(d)(1)(vii))

CCR unit designed, constructed, operated, and maintained with, for CCR units with downstream slopes which can be inundated by the pool of an adjacent water body, such as a river, stream or lake, downstream slopes that maintain structural stability during low pool of the adjacent water body or sudden drawdown of the adjacent water body.

The structural stability of the downstream slopes of the East Ash Pond was evaluated by comparing the location of the East Ash Pond relative to adjacent water bodies using published Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs), aerial imagery, and conditions observed in the field by AECOM.

Based on this evaluation, the nearest downstream water body is the Illinois River. However, the East Ash Pond is outside of the 100-year flood boundary for the Illinois River, as shown on the FEMA FIRM for the area. The East Ash Pond is adjacent to the downstream East Polishing Pond and East Leachate Pond non-CCR units, however these are not rivers, streams, or lakes, and drawdown of these non-CCR units is discussed in **Section 2.2** of this report, pursuant to §257.73(d)(1)(ii).

Based on this evaluation, the requirements in §257.73(d)(1)(vii) are not applicable to the East Ash Pond, as inundation of the downstream slopes by a river, stream, or lake is not expected to occur.

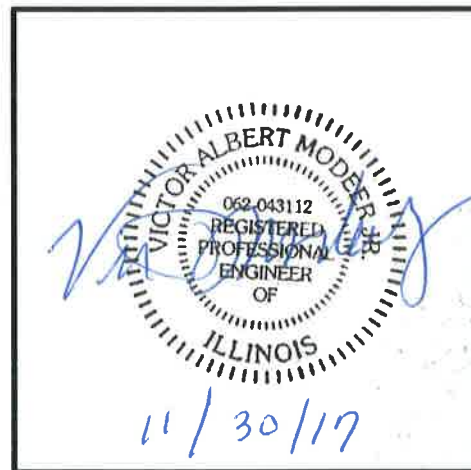
3 Certification Statement

CCR Unit: Dynegy Midwest Generation, LLC; Hennepin Power Station; East Ash Pond

I, Victor A. Modeer, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this CCR Rule Report, and the underlying data in the operating record, has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the initial structural stability assessment dated October 13, 2016 was conducted in accordance with the requirements of 40 CFR § 257.73(d).

VICTOR A MODEER JR.
Printed Name

10/13/16
Date



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ATTACHMENT Q



Submitted to
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October 2016

CCR Rule Report: Initial Safety Factor Assessment

For

East Ash Pond

At Hennepin Power Station

1 Introduction

This Coal Combustion Residual (CCR) Rule Report documents that the East Ash Pond at the Dynegy Midwest Generation, LLC Hennepin Power Station meets the safety factor assessment requirements specified in 40 Code of Federal Regulations (CFR) §257.73(e). The East Ash Pond is located near Hennepin, Illinois in Putnam County, approximately 0.4 miles east of the Hennepin Power Station. The East Ash Pond serves as the primary wet impoundment basin for CCR produced by the Hennepin Power Station.

The East Ash Pond is an existing CCR surface impoundment as defined by 40 CFR §257.53. The CCR Rule requires that the initial safety factor assessment for an existing CCR surface impoundment be completed by October 17, 2016.

The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer stating that the initial safety factor assessment meets the requirements of 40 CFR § 257.73(e). The owner or operator must prepare a safety factor assessment every five years.

2 Initial Safety Factor Assessment

40 CFR §257.73(e)(1)

The owner or operator must conduct initial and periodic safety factor assessments for each CCR unit and document whether the calculated factors of safety for each CCR unit achieve the minimum safety factors specified in (e)(1)(i) through (iv) of this section for the critical cross section of the embankment. The critical cross section is the cross section anticipated to be the most susceptible of all cross sections to structural failure based on appropriate engineering considerations, including loading conditions. The safety factor assessments must be supported by appropriate engineering calculations.

(i) The calculated static factor of safety under the long-term, maximum storage pool loading condition must equal or exceed 1.50.

(ii) The calculated static factor of safety under the maximum surcharge pool loading condition must equal or exceed 1.40.

(iii) The calculated seismic factor of safety must equal or exceed 1.00.

(iv) For dikes constructed of soils that have susceptibility to liquefaction, the calculated liquefaction factor of safety must equal or exceed 1.20.

A geotechnical investigation program and stability analyses were performed to evaluate the design, performance, and condition of the earthen dikes of the East Ash Pond. The exploration consisted of auger borings, installation of piezometers, and laboratory program including strength, consolidation and index testing. Data collected from the geotechnical investigation, available design drawings, construction records, inspection reports, previous engineering investigations, and other pertinent historic documents were utilized to perform the safety factor assessment and geotechnical analyses.

In general, the subsurface conditions at the East Ash Pond consist of stiff to hard embankment fill (clay) overlying medium dense to very dense alluvial gravel with trace amounts of silt and clay. The phreatic surface is within the foundation of the East Ash Pond.

Two (2) representative cross sections were analyzed using limit equilibrium slope stability analysis software to evaluate stability of the perimeter dike system and foundations. The cross sections were located to represent critical surface geometry, subsurface stratigraphy, and phreatic conditions across the site. Each cross section was evaluated for each of the loading conditions stipulated in §257.73(e)(1).

The Soils Susceptible to Liquefaction loading condition, §257.73(e)(1)(iv), was not evaluated because a liquefaction susceptibility evaluation did not find soils susceptible to liquefaction within the East Ash Pond dikes or foundation. As a result, this loading condition is not applicable to the East Ash Pond at the Hennepin Power Station.

Results of the Initial Safety Factor Assessments, for the critical cross-section for each loading condition, (i.e., the lowest calculated factor of safety out of the cross sections analyzed for each loading condition) are listed in **Table 1**.

Table 1 – Summary of Initial Safety Factor Assessments

Loading Conditions	§257.73(e)(1) Subsection	Minimum Factor of Safety	Calculated Factor of Safety
Maximum Storage Pool Loading	(i)	1.50	2.14
Maximum Surcharge Pool Loading	(ii)	1.40	2.14
Seismic	(iii)	1.00	2.53
Soils Susceptible to Liquefaction	(iv)	1.20	Not Applicable

Based on this evaluation, the East Ash Pond meets the requirements in §257.73(e)(1).

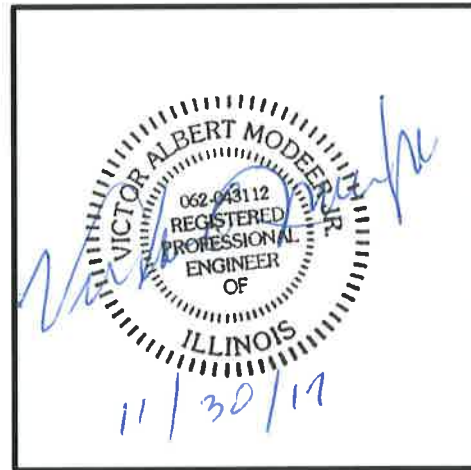
3 Certification Statement

CCR Unit: Dynegy Midwest Generation, LLC; Hennepin Power Station; East Ash Pond

I, Victor A. Modeer, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this CCR Rule Report, and the underlying data in the operating record, has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the initial safety factor assessment dated October 13, 2016 meets the requirements of 40 CFR §257.73(e).

VICTOR A MODEER JR.
Printed Name

10/13/14
Date



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ATTACHMENT R



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October 2016

CCR Rule Report:
Initial Inflow Design Flood Control
System Plan

For

East Ash Pond

At Hennepin Power Station

1 Introduction

This Coal Combustion Residual (CCR) Rule Report documents that the initial inflow design flood control system plan for the East Ash Pond at the Dynegy Midwest Generation, LLC Hennepin Power Station meets the requirements specified in 40 Code of Federal Regulations (CFR) §257.82. The East Ash Pond is located near Hennepin, Illinois in Putnam County, approximately 0.4 miles east of the Hennepin Power Station. The East Ash Pond serves as the primary wet impoundment basin for CCR produced by the Hennepin Power Station.

The East Ash Pond is an existing CCR surface impoundment as defined by 40 CFR §257.53. The CCR Rule requires that the initial inflow design flood control system plan for an existing CCR surface impoundment be prepared by October 17, 2016. The plan must document how the inflow design flood control system has been designed and constructed to meet the requirements of 40 CFR §257.82 and be supported by appropriate engineering calculations.

The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer stating that the inflow design flood control system meets the requirements of 40 CFR §257.82. The owner or operator must prepare an inflow design flood control system plan every five years.

2 Initial Inflow Design Flood Control System Plan

40 CFR §257.82

(a) The owner or operator of an existing ... CCR surface impoundment ... must design, construct, operate, and maintain an inflow design flood control system as specified in paragraphs (a)(1) and (2) of this section.

(1) The inflow design flood control system must adequately manage flow into the CCR unit during and following the peak discharge of the inflow design flood specified in paragraph (a)(3) of this section.

(2) The inflow design flood control system must adequately manage flow from the CCR unit to collect and control the peak discharge resulting from the inflow design flood specified in paragraph (a)(3) of this section.

(3) The inflow design flood is:

(i) For a high hazard potential CCR surface impoundment, ..., the probable maximum flood;

(ii) For a significant hazard potential CCR surface impoundment, ..., the 1,000-year flood;

(iii) For a low hazard potential CCR surface impoundment, ..., the 100-year flood; or

(iv) For an incised CCR surface impoundment, the 25-year flood.

(b) Discharge from the CCR unit must be handled in accordance with the surface water requirements under §257.3-3.

Analyses completed for the initial inflow design flood control system plan of the East Ash Pond are described in the following subsections. Data and analysis results in the following subsections are based on spillway design information shown on design drawings, construction information, topographic surveys, information about operational and maintenance procedures provided by Dynegy Midwest Generation, LLC, and field measurements collected by AECOM. The analysis approach and results of the hydrologic and hydraulic analyses are presented in the following subsections.

The East Ash Pond has a significant hazard potential based on the initial hazard potential classification assessment performed by Stantec in 2016 in accordance with §257.73(a)(2).

2.1 Initial Inflow Design Flood Control Systems (§257.82(a))

An initial inflow design flood control system plan, supported by a hydraulic and hydrologic analysis, was developed for the East Ash Pond by evaluating the effects of a 24-hour duration design storm for the 1,000-year Inflow Design Flood (IDF) using a hydrologic HydroCAD (Version 10) computer model and a starting water surface elevation of 490.4 feet. The computer model evaluated the East Ash Pond's ability to collect and control the 1,000-year IDF under existing operational and maintenance procedures. Rainfall data for the 1,000-year IDF was obtained from the National Oceanic and Atmospheric Administration (NOAA) Atlas 14. The NOAA Atlas 14 rainfall depth is 9.70 inches.

The HydroCAD model results for the East Ash Pond indicate that the CCR unit has sufficient storage capacity and spillway structures to adequately manage (1) flow into the CCR unit during and following the peak discharge of the 1,000-year IDF and (2) flow from the CCR unit to collect and control the peak discharge resulting from the 1,000-year IDF. The peak water surcharge elevation is 492.2 feet during the IDF, and the minimum crest elevation of the East Ash Pond dike is 493.0 feet. Therefore, overtopping is not expected.

Based on this evaluation, the East Ash Pond meets the requirements in §257.82(a).

2.2 Discharge from the CCR Unit (§257.82(b))

40 CFR §257.82(b) provides that the discharge from the CCR unit must be handled in accordance with the surface water requirements under 40 CFR §257.3-3, which states the following:

(a) For purposes of section 4004(a) of the Act, a facility shall not cause a discharge of pollutants into waters of the United States that is in violation of the requirements of the National Pollutant Discharge Elimination System (NPDES) under section 402 of the Clean Water Act, as amended.

(b) For purposes of section 4004(a) of the Act, a facility shall not cause a discharge of dredged material or fill material to waters of the United States that is in violation of the requirements under section 404 of the Clean Water Act, as amended.

(c) A facility or practice shall not cause non-point source pollution of waters of the United States that violates applicable legal requirements implementing an areawide or Statewide water quality management plan that has been approved by the Administrator under section 208 of the Clean Water Act, as amended.

(d) Definitions of the terms Discharge of dredged material, Point source, Pollutant, Waters of the United States, and Wetlands can be found in the Clean Water Act, as amended, 33 U.S.C. 1251 et seq., and implementing regulations, specifically 33 CFR part 323 (42 FR 37122, July 19, 1977).

The handling of discharge was evaluated by reviewing design drawings, operational and maintenance procedures, conditions observed in the field by AECOM, and the inflow design flood control system plan developed per §257.82(a).

Based on this evaluation, outflow from the East Ash Pond is ultimately routed through a NPDES-permitted discharge into the Illinois River via the East Polishing Pond and East Leachate Pond non-CCR surface impoundments. Hydraulic and hydrologic analyses performed as part of the initial inflow design flood control system plan found that the East Ash Pond adequately manages outflow during the 1,000-year IDF, as overtopping of the East Ash Pond embankments is not expected.

Therefore, discharge of pollutants in violation of the NPDES permit is not expected as all discharge is routed and controlled through the existing spillway system and NPDES-permitted outfall during both normal and IDF conditions. Based on this evaluation, the East Ash Pond meets the requirements in §257.82(b).

3 Certification Statement

CCR Unit: Dynegy Midwest Generation, LLC; Hennepin Power Station; East Ash Pond

I, Victor A. Modeer, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this CCR Rule Report, and the underlying data in the operating record, has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the initial inflow design flood control system plan dated October 13, 2016 meets the requirements of 40 CFR §257.82.

VICTOR A MODEER JR.
Printed Name

10/13/16
Date



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ATTACHMENT S

**PART 845 SAFETY AND
HEALTH PLAN**

**HENNEPIN POWER
PLANT
EAST ASH POND**

CONTENTS

REVISION SUMMARY	1
PREFACE	2
1. INTRODUCTION	3
1.1 Site Description/History	3
1.2 Facility Personnel	3
1.3 Responsibilities	3
1.3.1 DMG Point of Contact	3
1.3.2 DMG Employees	4
1.3.3 Contract Workers	4
1.3.4 Third-Party Contractor Employees	4
1.3.5 Third-Party Contractor Safety Competent Person	4
2. SITE ACCESS & CONTROL	5
2.1 Facility Security	5
2.2 Third-Party Contractor Management	5
2.3 Third-Party Contractor Safety and Health Plan	5
2.4 Authorized Personnel	5
2.5 Visitors	5
2.6 Communication	5
3. TRAINING & MEDICAL REQUIREMENTS	6
3.1 HAZWOPER Training	6
3.2 OSHA Construction Outreach Training	6
3.3 EAP Safety and Health Plan Review	6
3.4 Emergency and Monitoring Equipment Training	7
3.5 Hazard Communication	7
3.6 Medical Surveillance	7
3.7 Drug Screen and Background Investigations	8
3.8 COVID-19 Site Entry Guidelines	8
3.9 Document Management	8
3.10 Industrial Hygiene Sampling Records	8
4. HAZARD & CONTROLS	9
4.1 Ash/Unstable Surfaces	9
4.2 Ash Inhalation/Airborne Exposure	10
4.3 Stuck Vehicles/Equipment	11
4.4 Working Near/Over Water	11
4.5 Heavy Equipment	12
4.6 Overhead Powerlines	13
4.7 Severe Weather	14
4.8 Heat Stress	15
4.8.1 Heat Stress Prevention	15
4.9 Cold Stress	17
4.10 Biological Hazards	18
4.10.1 Ticks (Lyme Disease) & Mites	18
4.10.2 Insect Bites/Stings	20
4.10.3 Venomous Snakes	21
4.10.4 Poisonous Plants and Plant Hazards	22
4.11 Working Alone	23
5. HAZARD COMMUNICATION	25
5.1 Coal Combustion Residuals	25
5.2 Safety Data Sheets	26
5.3 Signage	26
6. EMERGENCY RESPONSE PLAN	27
6.1 Emergency Phone Numbers & Notifications	27
6.2 Evacuation Signal	27
6.3 Muster Point	27

6.4	Calls for Emergency Support	27
6.5	Fire & Explosion Response Plan	27
6.6	Injury Response Plan	28
6.7	Spill Response Plan	28
6.8	CCR Spill or Release Response Plan	28
6.9	Ash Pond Rescue	29
6.10	Incident Reporting	29

APPENDICES

Appendix A	Site Map
Appendix B	Safety and Health Plan Acknowledgment Form
Appendix C	Vistra Drug Screen Policies and Supplemental Terms
Appendix D	COVID-19 Vistra Site Entry Guidelines
Appendix E	Safety Data Sheets

ACRONYMS & ABBREVIATIONS

%	Percent
§	Section
35 I.A.C.	Title 35 of the Illinois Administrative Code
29 C.F.R.	Title 29 of the Code of Federal Regulations
ACGIH	American Conference of Governmental Industrial Hygienists
CCR	Coal Combustion Residual
DMG	Dynegy Midwest Generation, LLC
EAP	East Ash Pond
HAZWOPER	Hazardous Waste Operations and Emergency Response
HPP	Hennepin Power Plant
ID	identification
IDLH	Immediately Dangerous to Life and Health
IEPA	Illinois Environmental Protection Agency
kV	kilovolt
NID	National Inventory of Dams
NIOSH	National Institute for Occupational Safety and Health
No.	number
OSHA	Occupational Safety and Health Administration
Part 845	35 I.A.C. Part 845: Residuals in Surface Impoundments
PEL	Permissible Exposure Level
PFAS	Per- and polyfluoroalkyl substances
PFD	Personal Flotation Device
PNOR	particulates not otherwise recognized
POC	Point of Contact
PPE	personal protective equipment
ppm	parts per million
SDS	Safety Data Sheet
STEL	Short Term Exposure Limit
TLV	Threshold Limit Value
TWA	time-weighted averages
USCG	United States Coast Guard

PREFACE

Dynegy Midwest Generation, LLC (DMG) has prepared this Safety and Health Plan in accordance with requirements set forth in Title 35 of the Illinois Administrative Code (35 I.A.C.) Part 845: Residuals in Surface Impoundments (Part 845), Section (§) 845.530. DMG assessed health and safety hazards of its coal combustion residual (CCR) surface impoundments to develop and update this Safety and Health Plan.

This document describes the minimum anticipated protective measures necessary for worker health and safety at Hennepin Power Plant (HPP) East Ash Pond (EAP; Vistra identification [ID] number [No.] 803, Illinois Environmental Protection Agency [IEPA] ID No. W1550100002-05, National Inventory of Dams [NID] No. IL50363). Employees of DMG, contract workers, and third-party contractors must read and comply with the contents of this document. The contents of this document are not intended to cover all situations that may arise nor to waive any provisions specified in Federal, State, and local regulations or site owner / contractor health and safety requirements.

Third-party contractors are accountable for the health and safety of their employees. Third-party contractors are required to prepare a Safety and Health Plan that meets the minimum requirements herein. However, no requirements or provisions within this plan shall be construed as an assumption of DMG of their legal responsibilities as an employer.

This Safety and Health Plan will be reviewed and updated annually, at a minimum. The Safety and Health Plan will also be updated if facility operations change, or a new hazard is identified.

1. INTRODUCTION

This Safety and Health Plan has been developed to outline the requirements to be met by employees of DMG, contract workers, and third-party contractors while performing any activity to construct, operate, or close the EAP. This Safety and Health Plan has been developed to meet the requirements of 35 I.A.C. § 845.530 and describes the responsibilities, training requirements, protective equipment, and safety procedures necessary to minimize the risk of injury, fires, explosion, chemical spills, material damage incidents, and near misses related to CCR activities. This Safety and Health Plan incorporates by reference the Occupational Safety and Health Administration (OSHA) regulations contained in Title 29 of the Code of Federal Regulations (29 C.F.R.) § 1910 and 29 C.F.R. § 1926.

The requirements and guidelines in this Safety and Health Plan are based on a review of available information and data, and an evaluation of identified on-site hazards. This Safety and Health Plan will be reviewed with persons assigned to work in the EAP and will be available on-site.

1.1 Site Description/History

The HPP is a retired coal-fired power plant located in northcentral Illinois in Putnam County, approximately four miles northeast of the Village of Hennepin, located within the northeast quarter of Section 26, Township 33 North, Range 2 West. The HPP is an approximately 504-acre property consisting of 19 parcels, including the former power plant, CCR landfill and surface impoundments, and farmland. The HPP ceased operations in 2019 when the power plant was retired.

The EAP is situated south and adjacent to the Illinois River. The area is also bounded on the east and south by industrial properties owned by Tri-Con Materials and Washington Mills, respectively. The power plant provides the western boundary of the EAP, with agricultural land to the southwest (Appendix A).

1.2 Facility Personnel

The following table outlines key personnel with respect to facility operations and health and safety.

Name	Position	Phone Number
Jason Stuckey	Plant Manager / Point-of-Contact	815-719-0540 (mobile)
Security (24/7)	Site Security / Emergency Contact	309-660-7153
Mike Olle	Environmental Manager	815-875-7022 (mobile)
Matt Ballance	Engineering Manager	618-343-7739 (office) 618-792-7274 (mobile)
Jason Campbell	Dam Safety Manager	271-753-8904 (Springfield) 217-622-3491 (mobile)
Stu Cravens	Senior Technical Expert	217-390-1503 (mobile)
Vic Modeer	Engineering Manager	618-541-0878
Charles Koudelka	Plant Closure Director	903-235-8633

1.3 Responsibilities

The following persons have responsibilities associated with communicating and implementing the Safety and Health Plan for the EAP.

1.3.1 DMG Point of Contact

The DMG Point of Contact (POC) is a management-level person who is requiring employees, contract workers, or third-party contractors to enter the EAP. The DMG POC is responsible to communicate Safety and Health Plan information and requirements to employees, contract

workers, and third-party contractors, and oversee work performed in the EAP to the extent necessary to confirm implementation of Safety and Health Plan requirements.

1.3.2 DMG Employees

DMG employees are directly hired by DMG. They are required to implement and/or follow Safety and Health Plan requirements as applicable to their work and exercise their "stop work authority" if safety requirements are unclear or unanticipated site conditions or hazards are observed.

1.3.3 Contract Workers

Contract workers are those hired by DMG through an agency firm. Similar to DMG employees, contract workers are required to implement and/or follow Safety and Health Plan requirements as applicable to their work and exercise their "stop work authority" if safety requirements are unclear or unanticipated site conditions or hazards are observed.

1.3.4 Third-Party Contractor Employees

Third-party contractor employees work for firms under contract to DMG. Third-party contractors include prime contractors and all of their lower tier subcontractors. Similar to DMG employees, third-party contractors are required to implement Safety and Health Plan requirements as applicable to their work and exercise their "stop work authority" if safety requirements are unclear or unanticipated site conditions or hazards are observed.

1.3.5 Third-Party Contractor Safety Competent Person

Third-party contractors will be required to designate a Safety Competent Person. The Safety Competent Person must be in a management position (*e.g.*, superintendent, foreman, etc.) with OSHA 30-hour construction safety certification who may perform other duties, unless DMG requires a dedicated Safety Competent Person. A Safety Competent Person must be on site at all times when the subcontractor has employees performing work for DMG and must possess a sound working knowledge of pertinent OSHA regulations, this Safety and Health Plan, and other applicable safety requirements related to the scope of work. Third-party contractors must also designate a backup Safety Competent Person that possesses the same authority and training. The competent person will ensure timely correction of safety deficiencies identified by DMG. The Safety Competent Person is responsible to ensure Safety and Health Plan requirements have been communicated to lower-tier subcontractors and enforce Safety and Health Plan requirements.

2. SITE ACCESS & CONTROL

This section outlines requirements for ensuring that only authorized personnel and visitors are permitted in the EAP.

2.1 Facility Security

Elements of site control include restricting access to the EAP to persons until they have met the training requirements outlined in this Safety and Health Plan and have been authorized to do so by HPP POC or their representative.

Upon arriving to the facility, all DMG employees, contract workers, and third-party contractors must sign in at the main gate. All personnel must also sign out upon leaving the EAP.

Upon arrival to the Site, all DMG employees, contract workers, and third-party contractors must check in/out at Security. A COVID-19 screening must also be completed per [Section 3.8](#).

2.2 Third-Party Contractor Management

Prior to working at the EAP, all third-party prime contractors must maintain an active registration with [ISNetworld](#) and maintain a grade of A or B. Lower tier subcontractors are currently not required to be registered in [ISNetworld](#), but this requirement may change at the discretion of DMG.

2.3 Third-Party Contractor Safety and Health Plan

Prior to being authorized to conduct work at the EAP, third-party contractors must develop and submit a Safety and Health Plan. The third-party contractor's Safety and Health Plan must be specific to the scope of work that they will be performing at the EAP. The third-party contractor's Safety and Health Plan must meet or exceed all the requirements in this Safety and Health Plan, other DMG requirements, and applicable regulations. All lower tier subcontractors of third-party contractors must meet the requirements in this Safety and Health Plan as well as the requirements outlined in the Safety and Health Plan of the third-party with whom they are contracted.

2.4 Authorized Personnel

At a minimum, authorized personnel who will be granted unescorted access to the project include DMG employees, contract workers, and third-party contractors that meet the following:

- Reviewed this Safety and Health Plan and other applicable safety planning documentation
- Have completed all the training, medical surveillance, and drug screen and background investigation requirements as outlined in [Section 3](#) of this Safety and Health Plan.
- Received a Pre-Job Brief/Site Orientation Training

2.5 Visitors

Visitors must be escorted by Authorized Personnel through the EAP if they have not reviewed this Safety and Health Plan or completed the training requirements outlined in [Section 3](#) of this Safety and Health Plan. Visitors may not undertake any activity to construct, operate, or close a CCR surface impoundment.

2.6 Communication

Communication between workers and emergency services must be maintained at all times. Cellular service is not consistently available and cannot be relied upon to summon emergency services.

In lieu of using mobile phones, handheld radios must be used to communicate with Security. Third-party contractors are responsible for providing their radios and must leave one at Security upon arrival to the site.

3. TRAINING & MEDICAL REQUIREMENTS

Project personnel must be properly trained for the type of work being performed and in accordance with 35 I.A.C. § 845.530, 29 C.F.R. § 1926 and 29 C.F.R. § 1910, and DMG policies. Additionally, personnel working in areas regulated by the OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) standards (29 C.F.R. § 1910.120 and 29 C.F.R. § 1926.65) must have current medical surveillance. All employees, contractors, and third-party contractors must complete the following prior to beginning any activity to construct, operate, or close the EAP.

3.1 HAZWOPER Training

35 I.A.C. § 845.530(c)(2)(E) requires that all employees, contract workers, and third-party contractors be trained in accordance with 29 C.F.R. § 1910.120 and 29 C.F.R. § 1926.65. The following training will be completed as required by job function:

- **OSHA 40-Hour Training** per 29 C.F.R. § 1910.120 and 29 C.F.R. § 1926.65, for those personnel who are expected to have extensive contact with contaminated materials and/or may be required to wear a respirator.
- **OSHA 24-Hour Training** per 29 C.F.R. § 1910.120 and 29 C.F.R. § 1926.65, for those personnel who are expected to have minimal contact with contaminated materials and will NOT be required to wear a respirator.
- **OSHA 8-hour Supervisor Training** per 29 C.F.R. § 1910.120 and 29 C.F.R. § 1926.65, for Site Supervisors, Foremen, Superintendents, and others who will be directing and managing site activities.
- **OSHA 8-hour Refresher** per 29 C.F.R. § 1910.120 and 29 C.F.R. § 1926.65, completed within 12 months of initial 40-hour or 24-hour training and annually thereafter.

The following matrix outlines HAZWOPER training requirements based on typical job functions at the EAP. It is not intended to be all inclusive, new job functions must be evaluated per 29 C.F.R. § 1910.120 and 29 C.F.R. § 1926.65.

Training	Job Function
OSHA 40-hour	Ash handlers
OSHA 24-hour	Personnel not required to handle CCR materials
OSHA 8-hour Supervisor Training	Third-Party Contractor Safety Competent Persons
OSHA 8-hour refresher	All personnel

3.2 OSHA Construction Outreach Training

35 I.A.C. § 845.530(c)(2)(E) requires that all employees, contract workers, and third-party contractors complete an OSHA 10-hour or 30-hour construction safety training. These trainings will be completed as follows:

- All employees, contract workers, and third-party contract employees: OSHA 10-hour or 30-hour construction outreach training.
- Supervisors, superintendents, foreman and safety professionals: OSHA 30-hour construction outreach training.

3.3 EAP Safety and Health Plan Review

Pursuant to 35 I.A.C. § 845.530(d)(e), before beginning any activity at the EAP, and annually thereafter, all DMG employees, contract workers, and third-party contractors must review the content of this HASP. After reviewing this Safety and Health Plan all personnel will understand the following:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- Communications or alarm systems outlined in [Section 6](#)
- Response to fires and explosions outlined in [Section 6](#)
- Response to a spill or release of CCR
- Information about chemical hazards and hazardous materials outlined in [Section 5](#)
- The use of engineering controls, administrative controls, and personal protective equipment (PPE) outlined in [Section 4](#)

All personnel will acknowledge this HASP by signing the *Safety and Health Plan Acknowledgment Form (Appendix B)*.

3.4 Emergency and Monitoring Equipment Training

All DMG employees, contract workers, and third-party contractors must be aware of how to respond to alarms and other emergencies as outlined in [Section 6](#) of this plan. Individuals may only use facility emergency and monitoring equipment if they have been trained in their use and authorized to do so by the designated POC. Additionally, a written release may need to be completed as required by Vistra Corporate Procedure FFA-POL-0006.

Individual DMG employees and contract workers may be responsible for using, inspecting, repairing and replacing facility emergency monitoring equipment. These individuals will be trained in accordance with procedures identified by DMG. These individuals will review and adhere to the manufacturer's instructions, where applicable.

Third-party contractors are responsible for inspecting, repairing, and replacing any owned emergency (*i.e.*, fire extinguishers) and monitoring equipment (*i.e.*, air monitoring equipment). Third-party contractors will maintain procedures for using inspecting, repairing, and replacing owned emergency and monitoring equipment that is consistent with the manufacturer's requirements. Third-party contractor employees who are responsible for this equipment will be trained in procedures for using, inspecting, and repairing owned equipment by their employer.

3.5 Hazard Communication

All employees, contract workers, and third-party contractors must be trained in chemical hazards (if any) associated with their work in accordance with 29 C.F.R. § 1910.1200. Work tasks performed on the EAP may include exposure to compounds identified in the [Hazard Communication](#) section of this Safety and Health Plan and is included as part of the [Safety and Health Plan Review](#) outlined in [Section 3.3](#).

3.6 Medical Surveillance

All employees, contract workers, and third-party contractors engaged in operations specified in 29 C.F.R. § 1910.120 and 29 C.F.R. § 1926.65 and meet one of the criteria outlined in 29 C.F.R. § 1910.120(f)(2) and 29 C.F.R. § 1926.65(f)(2) must participate in a medical surveillance program that is administered by their employer. The criteria for participating in a medical surveillance program are:

- All employees who are or may be exposed to hazardous substances at or above the established permissible exposure limit, without regard to the use of respirators, for 30 days or more a year;
- All employees who wear a respirator for 30 days or more a year; or
- All employees who are injured, become ill or develop signs or symptoms due to possible overexposure involving hazardous substances or health hazards from an emergency response or hazardous waste operation.

The medical surveillance program must result in documentation that an individual is cleared to work on sites covered by 29 C.F.R. § 1910.120 and 20 C.F.R. § 1926.65 and is medically fit to wear a respirator when applicable.

3.7 Drug Screen and Background Investigations

DMG requires that contract worker agencies and third-party contractors are responsible for ensuring that all personnel have completed and passed a drug and alcohol test and background investigation prior to on-site work as described in Appendix C.

3.8 COVID-19 Site Entry Guidelines

All personnel entering Vistra work sites shall review and adhere to the site entry guidelines provided in Appendix D.

3.9 Document Management

DMG will maintain employee and contract employee training and medical surveillance records at corporate headquarters. Third-party contractors are responsible for maintaining training and medical surveillance documentation for their employees. Third-party contractors will produce documentation upon DMG request.

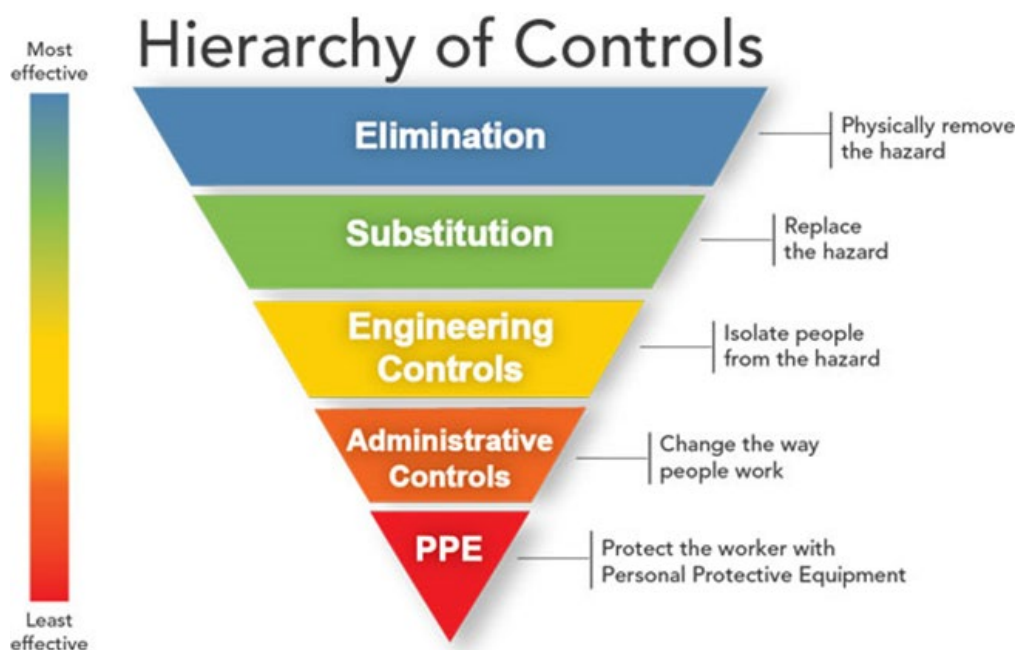
3.10 Industrial Hygiene Sampling Records

Upon receipt of exposure sampling results DMG and third-party contractors must distribute exposure sampling results to employees within 15 business days unless otherwise required by applicable regulation. All personnel exposure sampling results and records must be maintained by the employee's company for at least 30 years following termination of employment.

4. HAZARD & CONTROLS

The following section outlines general controls for the hazards and controls. Third-party contractors are still responsible for developing a Safety and Health Plan that incorporates requirements of this Safety and Health Plan, other safety requirements for the HPP, as well as the third-party contractor’s safety policies and procedures. Safety and Health Plans developed by third-party contractors must be specific to the site and the anticipated work means and methods. Safety and Health Plans that consist of only standard operating procedures or are not otherwise specific to the work performed at the EAP will not be accepted by DMG.

DMG requires that a hierarchy of controls be considered when performing work at the EAP. Implement controls that favor elimination, substitution, and engineering over the use of administrative controls and PPE when feasible. See the figure below for additional guidance (courtesy of the National Institute for Occupational Safety and Health [NIOSH]).



4.1 Ash/Unstable Surfaces

Prior to working in or on an ash pond, third-party contractors must notify the POC. Work in or on an ash pond may not begin until the facility POC has approved the work. Upon completion of the work third-party contractors must notify the POC that they have left the ash pond.

All individuals must check in with the POC upon arrival and departure of the EAP.

When working on ash ponds or unstable surfaces the following requirements must be implemented where applicable and feasible. The following table summarizes safety controls for work performed in ash ponds and on unstable surfaces and are aligned to the hierarchy of controls:

Elimination	Substitution	Engineering	Administrative	PPE
Change the work task or work methods so that work on ash ponds is no longer required	Use the lightest available tracked equipment to reduce ground pressure	Use crane mats or other cribbing to support heavy equipment on ash ponds	Traverse compacted paths that have previously been used by heavy equipment	Use a restraint (tethering) system to prevent falls or slips into unstable ash pond surfaces or surface water that represents a drowning hazard

Elimination	Substitution	Engineering	Administrative	PPE
			If an unstable condition exists, complete a Next Level Up Pre-Job Brief prior to accessing the ash pond.	
			Approach the ash pond from the most stable direction	
			Inspect travel paths for recent terrain shifts, particularly following heavy rains or rapid dewatering	
			Working alone on ash ponds is prohibited without pre-approval from the POC.	
			When a drowning hazard exists, implement requirements for working on/near water as outlined in Section 4.4.	
			Implement an emergency response plan with trained responders for falls into (or engulfment by) ash	

4.2 Ash Inhalation/Airborne Exposure

Ash that becomes airborne due to site activities or environmental conditions may result in an exposure to its components as outlined in [Section 5.1](#). DMG and third-party contractors are responsible for ensuring their respective employees' and contract workers' exposures are below occupational exposure limits. Upon request, third-party contractors must demonstrate to DMG that exposure control methods are adequate. The following table summarizes airborne exposure controls and is aligned to the hierarchy of controls:

Elimination	Substitution	Engineering	Administrative	PPE
Change the work task or work methods so that work on ash ponds is no longer required	Substitute manual work methods for those that can be completed from the cab of a vehicle	Continually wet work areas to reduce the amount of ash that becomes airborne Equip vehicles and heavy equipment cabs with filters. Clean and change filters as required	Conduct air monitoring or exposure sampling to confirm that airborne exposure is below regulatory limits	If exposure levels are above the PEL, equip employees with respirators appropriate to the level of exposure

4.3 Stuck Vehicles/Equipment

If a vehicle or piece of equipment becomes stuck, a third-party towing or wrecking company who is trained in vehicle extraction must be retained and the DMG will be notified. Third-party contractors may extract their own vehicle if they have an approved extraction plan, and a competent person is on site to implement the extraction. The extraction plan shall be included as part of the third-party contractor’s reviewed and approved Safety and Health Plan. The above notifications are still required.

The hazards presented by stuck vehicles/equipment must not be underestimated. While the weight of the stuck equipment can be calculated, it’s impossible to precisely calculate the other forces that are pulling against the towing vehicle which requires special training and experience to properly size towing equipment and select towing techniques. This is especially true for “complex” or high-hazard extractions involving equipment stuck at axle depth (or beyond) or sloped surfaces or any area where extraction activities could trigger shifts in the ground surface. No chains shall be used to remove stuck vehicles/equipment.

The following table summarizes safety controls related to stuck vehicles and equipment and are aligned to the hierarchy of controls:

Elimination	Substitution	Engineering	Administrative	PPE
Change the work task or work methods so that work on ash ponds is no longer required	Use the lightest available tracked equipment to reduce ground pressure Substitute tracked equipment for wheeled equipment	Use crane mats or other cribbing to support heavy equipment on ash ponds Lighten the load – Remove materials from stuck vehicles or equipment prior to extraction if possible	Only persons trained in vehicle extraction are permitted to remove stuck vehicles/equipment A professional towing/wrecking service is required Prepare for spills (damage to fuel or hydraulic systems)	All persons involved in removing stuck equipment must wear PPE that includes hard hat, safety boots, safety glasses, high visibility vests, and cut resistant gloves

4.4 Working Near/Over Water

All employees, contract workers, and third-party contractors must wear a United States Coast Guard (USCG) approved personal floatation device (PFD), when within 6 feet of water, over water, and/or wading in water where the danger of drowning exists. The PFD must be properly secured to the wearer, free of all defects including rips, tears, stress, and fading, and be kept clean and free of excessive dirt and oil.

If the possibility of falling into water has been eliminated through the use of guardrails, fall restraint, or other method, the use of a PFD is no longer required.

When performing work on water from a vessel, at least one lifesaving rescue vessel (e.g., a skiff) shall be immediately available at locations where employees are working over, in, on, or adjacent to water where the danger of drowning exists. However, if the water is so shallow that rescuers could simply walk/run into the water body without endangering themselves and/or others or the work was being conducted very close to shore (e.g., the length of the skiff from shore would be greater than the working distance from shore and/or the skiff would foul on the bottom), a skiff would not be required.

The following table summarizes the requirements for working over/near water where a drowning hazard exists and are aligned to the hierarchy of controls:

Elimination	Substitution	Engineering	Administrative	PPE
Change the work task or work methods so that work near a drowning hazard is no longer required		Install guardrails that separate work areas from the drowning hazard	All work to be performed by at least two people where each is equipped with proper safety gear and capable of summoning emergency rescue	All personnel are required to wear suitable PFDs
		Utilize equipment (crowd-control barricades, safety fence, etc.) that will keep personnel at least 6 feet from a drowning hazard	When working on water use of a rescue skiff as outlined above	
			Use of a ring buoy with 90 feet of braided polycarbonate (or equivalent) line	
			Ring buoys must be positioned within 100 feet of work (maximum of 200 feet spacing)	

4.5 Heavy Equipment

All heavy equipment operators must be competent and authorized to operate each piece of heavy equipment. Forklift and telehandler (e.g., Lull, JLG) operators must have a license or certificate that indicates they have passed a written test and "road" test for the equipment they will be operating within the last 3 years. Third-party contractors will provide proof of qualification upon request of DMG.

Persons working around heavy equipment must implement the "25 Foot Rule." The 25 Foot Rule requires that persons get the operator's attention and permission prior to approaching closer than 25 feet to heavy equipment. Persons must walk quickly through blind spots. Loitering in heavy equipment blind spots (especially to the rear) must be avoided.

Temporary fuel storage tanks will be labelled as to their content and be protected from collision by Site vehicles using solid barricades including balusters, chain link fence, or equivalent. Spill kit (55-gallon sorbent capacity contained in an overpack) and one 20-pound Type ABC fire

extinguisher will be located within 45 feet of fueling areas. Tanks will be rated for above ground use and provided with secondary containment. Tanks will be rated for above ground use and will be double walled or have secondary containment in case of a leak. Tanks and dispensing hose will be bonded and grounded. On-site filling of fuel storage tanks will be completed with trucks that have automatic over-flow shutoffs. These trucks will be properly bonded to the storage tank and meet all of the other storage tank requirements. Temporary secondary containment must be provided in the refueling area that includes the storage tank and dispensing hoses.

Elimination	Substitution	Engineering	Administrative	PPE
		Heavy equipment (and vehicles) must be equipped with backup alarms, horns, roll-over protection (when feasible)	Operators must be competent and authorized	Operators must use seatbelts when equipped
		Vehicles and heavy equipment operated at night must have headlights, tail lamps, and reflectors	Forklift operators must have a current license or certificate (within 3 years)	High visibility vests are required when working around heavy equipment
			All vehicles and equipment must be turned off when not in use	
			Operators must inspect equipment daily prior to use	
			Persons working near heavy equipment must follow the "25 Foot Rule" and avoid lingering in blind spots as outlined above	
			Always obey site speed limits – 15 mph unless otherwise posted	

4.6 Overhead Powerlines

All overhead powerlines must be assumed to be energized until confirmed otherwise. The minimum clearance distance for equipment working near energized power lines must be in accordance with the table found in 29 C.F.R. § 1926.1408(h).

The following table summarizes safety controls for work near energized power lines:

Elimination	Substitution	Engineering	Administrative	PPE
Plan to work away from powerlines	Use heavy equipment with shorter booms/attachments to avoid coming close to power lines	Contact the utility owner to deenergize the line	Install signs to warn personnel of overhead powerlines	

Elimination	Substitution	Engineering	Administrative	PPE
		Contact the utility owner to install insulated sleeves over energized lines	Install a non-conductive distance marker to delineate minimum clearance	
			Use a dedicated spotter to ensure equipment does not enter minimum clearance distances	

4.7 Severe Weather

Severe weather conditions include but are not limited to high winds, electrical storms, heavy rain, and tornados can cause hazardous conditions at CCR surface impoundments. The primary control for severe weather is monitoring weather reports prior to beginning work and as work occurs throughout the day.

Monitor lightning using a commercially available mobile application if cellular service is available. When lightning is observed within 10 miles of the CCR surface impoundment, or a storm is imminent, take shelter in the nearest solid structure or fully enclosed vehicle. If possible secure all tools, materials, and equipment prior to the storm arriving. Work may resume 30 minutes after the last lightning strike is observed within 10 miles. The following locations are acceptable shelter locations near the EAP:

- The stairwell inside the front door of the Main Plant
- The breakroom on the 2nd floor of the Main Plant

Do not conduct work on a CCR surface impoundment when there is a risk for tornados in the area. If on a CCR surface impoundment and a tornado forms, seek the nearest substantial shelter. The closest tornado shelters are the locations listed above; shelter locations will be reviewed during the Site Orientation Training. If no shelter is available, attempt to evacuate to a shelter using a vehicle. If a tornado forms and you are not in a shelter, take one of the following actions:

- Stay in a vehicle with the seat belt on, keep your head below the windows and cover it with your hands
- If there is an area which is noticeably lower than the work area, lie in that area and cover your head with your hands.

The following table summarizes safety controls related to severe weather:

Elimination	Substitution	Engineering	Administrative	PPE
Plan outdoor tasks on days with low potential for severe weather.			Prior to beginning outdoor work monitor the day's weather.	

Elimination	Substitution	Engineering	Administrative	PPE
			Periodically monitor weather throughout the day. Use a weather app which issues alerts for severe weather and lightning, assuming cell service is available	
			Utilize a weather radio if cellular service is inconsistent	
			Stop all outdoor work and seek shelter when lightning is observed	

4.8 Heat Stress

Heat stress can be a significant hazard, especially for workers wearing protective clothing. Depending on the ambient conditions and the work being performed, heat stress can occur very rapidly, within as little as 15 minutes. Employees, contract workers, and third-party contractors will be instructed in the identification of a heat stress victim, the first-aid treatment procedures for the victim, and in the prevention of heat stress incidents.

Workers will be encouraged to immediately report any heat-related problems that they experience or observe in fellow workers. Any worker exhibiting signs of heat stress and exhaustion should be made to rest in a cool location and drink plenty of water. Emergency help by a medical professional is required immediately for anyone exhibiting symptoms of heat stroke, such as red, dry skin, confusion, delirium, or unconsciousness. Heat stroke is a life-threatening condition that must be treated immediately by competent medical authority.

4.8.1 Heat Stress Prevention

To prevent heat stress, DMG employees, contract workers, and third-party contractors will implement heat stress prevention measures as outlined in OSHA’s [Heat Index](#) (below). A summary of these precautions is described below.

Heat Index	Risk Level	Protective Measures
Less than 91°F	Lower (Caution)	Basic heat safety and planning
91°F to 103°F	Moderate	Implement precautions and heighten awareness
103°F to 115°F	High	Additional precautions to protect workers
Greater than 115°F	Very High to Extreme	Triggers even more aggressive protective measures

Know the Symptoms: Some symptoms associated with heat stress are: Employees should be aware of these symptoms with themselves and with their co-workers:

- Elevated heart rate, lack of concentration, difficulty focusing on a task, fatigue
- Irritability and/or sickness
- Cramps, rash, headache
- Loss of desire to drink water
- Fainting
- Skin clammy, moist, and pale (severe heat exhaustion)
- Skin extremely dry and red (heat stroke)

Acclimatize: When high heat stress conditions arise, employees should be exposed to the heat for short work periods followed by longer periods of work. Acclimatization usually takes five (5) days and should be provided for all new employees and employees returning from an absence of two (2) weeks or more. Contact Corporate Health and Safety for proper procedures.

Hydration & Pace of Work: Make sure all employees intake plenty of water throughout the work day (sometimes as much as a quart per worker per hour) and let employees know where the drinking water is located. Adjust your work pace and expectations on how much work can be done during periods of high heat stress. Workers cannot do as much during periods of high heat stress compared with similar periods of low heat stress. After acclimatization, workers may be able to resume a more “normal” work pace as long as fluid intake is adequate.

Work/Rest Periods: If possible, heavy work should be scheduled during the cooler parts of the day (*i.e.*, early morning) and rest periods should be taken in cool areas for longer periods.

Personal Protective Equipment (PPE): Employees using PPE (*i.e.*, Tyvek® suits or other equipment which may retain heat) can be more susceptible to heat stress due to the fact that heat/sweat often cannot escape the suits and/or the equipment. Persons wearing PPE that contributes to heat stress require more hydration, longer rest periods, or a reduced pace of work. Also, more careful monitoring of each person’s health status is required by co-workers and management.

The following table summarizes safety controls for heat related illnesses:

Elimination	Substitution	Engineering	Administrative	PPE
Perform outdoor, strenuous, tasks at cooler times of day/year	Use mechanized equipment in place of manual labor	Install fans or air conditioning units in the work area	Train all personnel to know the signs of heat stress/stroke and how to prevent it	Implement the use of cooling vests or other similar PPE
		Install a canopy to provide shade to work areas	Allow workers to acclimatize to the work environment	
		Provide cool, shaded break areas	Adjust work pace to allow for the effects of heat	
			Implement work/rest periods	

4.9 Cold Stress

The four environmental conditions that cause cold-related stress are low temperatures, high/cool winds (wind chill), dampness, and cold water. One, or any combination of these factors, can cause cold-related hazards. Cold stress, including frostbite and hypothermia, can result in severe health effects. Employees, contract employees, and third-party contractors will be instructed in the identification of a cold stress victim, the first-aid treatment procedures for the victim and in the prevention of heat stress incidents.

A dangerous situation of rapid heat loss may arise for any individual exposed to high winds and cold temperatures. Major risk factors for cold-related stresses include:

- Wearing inadequate or wet clothing thus increasing the effects of cold on the body.
- Taking certain drugs or medications such as alcohol, nicotine, caffeine, and medication thus inhibiting the body's response to the cold and/or impairing judgment.
- Having a cold or certain disease, such as diabetes, heart, vascular and thyroid problems, and thereby increasing susceptibility to the winter elements.
- Lower body-fat composition or other physiological differences. Statistics show that men experience far greater death rates due to cold exposure than women, potentially attributable to participation in risk-taking activities, lower body-fat composition and/or other physiological differences.
- Becoming exhausted or immobilized, especially due to injury or entrapment, thus speeding up the effects of cold weather.

The following table provides the resulting equivalent chill temperature to exposed skin because of increasing wind speeds at decreasing actual temperatures. Personnel shall be aware of predicted weather conditions before beginning site work and stay apprised of changes.

TABLE 2. Cooling Power of Wind on Exposed Flesh Expressed as Equivalent Temperature (under calm conditions)*

Estimated Wind Speed (in mph)	Actual Temperature Reading (°F)											
	50	40	30	20	10	0	-10	-20	-30	-40	-50	-60
	Equivalent Chill Temperature (°F)											
calm	50	40	30	20	10	0	-10	-20	-30	-40	-50	-60
5	48	37	27	16	6	-5	-15	-26	-36	-47	-57	-68
10	40	28	16	4	-9	-24	-33	-46	-58	-70	-83	-95
15	36	22	9	-5	-18	-32	-45	-58	-72	-85	-99	-112
20	32	18	4	-10	-25	-39	-53	-67	-82	-96	-110	-121
25	30	16	0	-15	-29	-44	-59	-74	-88	-104	-118	-133
30	28	13	-2	-18	-33	-48	-63	-79	-94	-109	-125	-140
35	27	11	-4	-20	-35	-51	-67	-82	-98	-113	-129	-145
40	26	10	-6	-21	-37	-53	-69	-85	-100	-116	-132	-148
(Wind speeds greater than 40 mph have little additional effect.)	LITTLE DANGER In < hr with dry skin. Maximum danger of false sense of security			INCREASING DANGER Danger from freezing of exposed flesh within one minute.				GREAT DANGER Flesh may freeze within 30 seconds.				
Trenchfoot and immersion foot may occur at any point on this chart.												

*Developed by U.S. Army Research Institute of Environmental Medicine, Natick, MA.
 Equivalent chill temperature requiring dry clothing to maintain core body temperature above 36°C (96.8°F) per cold stress TLV

The following table summarizes safety controls for preventing cold stress:

Elimination	Substitution	Engineering	Administrative	PPE
Perform work during warm parts of the day or warmer parts of the year		Install heaters in enclosed work areas	Train all personnel on the symptoms of cold stress and how to prevent it	All personnel must wear multiple layers of clothing
		Provide a warm break area	Implement work/rest schedule	Utilize hand/foot warmers when required

An additional hazard in cold weather conditions is the increased risk for slips from the accumulation of ice and snow in general work areas, ruts where water is accumulated, and heavy equipment. The following table outlines controls that may be used for preventing slips:

Elimination	Substitution	Engineering	Administrative	PPE
Perform work during warm parts of the day or in areas free of accumulated areas		Clear snow in work areas		Use traction control devices (i.e., YakTrax) on work boots to provide additional traction.
		Apply salt/sand to icy areas		
		Use equipment to access work areas		

4.10 Biological Hazards

The following are biological hazards that may be present at the EAP.

4.10.1 Ticks (Lyme Disease) & Mites

Although Lyme disease has been detected throughout the continental United States, it is prevalent primarily in certain areas in New England, the Mid-Atlantic and the northern Midwest

states. Although Lyme disease is the most common tickborne illness, other tickborne illnesses include southern tick-associated rash illness, Rocky Mountain spotted fever, ehrlichiosis, and tularemia. More information on Lyme disease and other tickborne illnesses can be found from the [CDC](#).

Prevention

- Standard field gear (work boots, socks, and light-colored coveralls) provides good protection against tick bites, particularly if the joints are taped. However, even when wearing field gear, the following precautions shall be taken when working in areas that might be infested with ticks:
 - Wear long pants and long-sleeved shirts that fit tightly at the ankles and wrists, tape cuffs if necessary
 - Wear light colored clothing so ticks can be easily spotted
 - Per- and polyfluoroalkyl substances (PFAS)-free tick repellents (DEET and Permethrin) must be used when walking in all overgrown areas. DEET (≥ 25 percent [%]) must be applied to skin while permethrin must be applied to clothes and allowed to dry. Spray outer clothing, particularly your pant legs and socks, BUT NOT YOUR SKIN, with an insect repellent that contains permethrin. For heavily infested tick areas, wear spun polypropylene coveralls that have been sprayed with permethrin.
 - Inspect clothing frequently
 - Inspect head and body thoroughly when you return from the field, particularly on your lower legs and areas covered with hair
 - When walking in wooded areas, wear a hard hat, and avoid contact with bushes, tall grass, or brush as much as possible

Removal

- Remove any ticks by tugging with tweezers or special tick removal tools
- Do not squeeze or crush the tick
- DO NOT use matches, a lit cigarette, nail polish, or any other type of chemical to "coax" the tick out

Treatment

- Disinfect the area with alcohol or a similar antiseptic after removal
- Notify the Safety Competent Person of the embedded tick
- For several days to several weeks after removal of the tick, look for the signs of the onset of Lyme disease, such as a rash.
- No further treatment is necessary for ticks embedded <48 hours.
- If other signs or symptoms of Lyme are observed (fever/chills, aches, and pains), then notify the Safety Competent Person and seek medical attention

The following table summarizes safety controls to reduce the hazards associated with ticks and mites.

Elimination	Substitution	Engineering	Administrative	PPE
Use mechanical equipment to remove overgrown vegetation		Remove overgrowth and excessive vegetation from walkways and work areas (provide safe access)	Train personnel on tick and mite prevention. Areas of vegetation overgrowth and/or debris piles should be considered "high risk" areas	Wear light-colored long sleeved shirt tucked into pants. Tuck pant legs into socks
			Perform frequent tick checks in the field and a thorough tick check after completing work activities	Apply Permethrin to clothes and DEET (20% or more) to exposed skin
			Call licensed pesticide contractors to remove infestations of bees, wasps, fire ants, etc.	

4.10.2 Insect Bites/Stings

Stinging/biting insects at the EAP include spiders, wasps, and bees. Contact with these insects may result in project personnel experiencing adverse health effects that range from being mildly uncomfortable to being life-threatening. Therefore, insects present a serious hazard to project personnel, and extreme caution must be exercised whenever Site and weather conditions increase the risk of encountering stinging insects. Some of the factors related to stinging insects that increase the degree of risk associated with accidental contact are as follows:

- The nests for these insects are frequently found in remote wooded or grassy areas or equipment staging areas where equipment has not been moved recently.
- Some people are hypersensitive to the toxins injected by a sting, and when stung, experience a violent and immediate allergic reaction resulting in a life-threatening condition known as anaphylactic shock. Anaphylactic shock manifests itself very rapidly and is characterized by extreme swelling of the body, eyes, face, mouth, and respiratory passages.
- The hypersensitivity needed to cause anaphylactic shock, can in some people accumulate over time and exposure, therefore even if someone has been stung previously and not experienced an allergic reaction, there is no guarantee that they will not have an allergic reaction if they are stung again
- Spider bites generally only cause localized reactions such as swelling, pain, and redness. However, bites from a Black Widow or Brown Recluse, or if you are allergic to spiders, can cause symptoms that are more serious.
- ***If a worker knows that they are hypersensitive to bee, wasp, or hornet stings, or other insects, they must inform the Safety Competent Person prior to site work. Persons who have been prescribed epi-pens by their physician must have an epi-pen on the Site.***
- Inspect any clothing or PPE that has been left for a period of time prior to putting it on. Shake out the clothing and inspect the inside of safety shoes/boots prior to putting them on
- Nests in active work areas must be eradicated. Small nests may be handled by Site personnel using consumer-type insecticide. A pest control contractor should be hired to handle large or difficult to reach nests.

The following table outlines safety controls to reduce the risk of hazards associated with stinging/biting insects.

Elimination	Substitution	Engineering	Administrative	PPE
Use mechanical equipment to remove overgrown vegetation		Remove overgrowth and excessive vegetation from walkways and work areas (provide safe access)	Train personnel on stinging/biting insect prevention. Areas of vegetation overgrowth and/or debris piles should be considered "high risk" areas	Wear light-colored long sleeved shirt tucked into pants. Tuck pant legs into socks
		Eradicate nests in the work area as outlined above.	Instruct personnel to inspect/shake out clothing and work boots that have been left for a period of time.	Apply Permethrin to clothes and DEET (20% or more) to exposed skin – NOTE this will not repel bees/wasps
			Instruct employees who are hypersensitive to insect bites/stings to carry their epi-pen while on site	

4.10.3 Venomous Snakes

There are four species of venomous snakes in Illinois, they are:

- Copperhead
- Cottonmouth Water Moccasin
- Timber rattlesnake
- Eastern Massasauga

Generally, these snakes are found in the southern one-third of the state, with the Cottonmouth Water Moccasin found mostly in the southernmost portions of Illinois. Snakes are generally found in tall grass, wood piles, or other covered areas. Snakes are generally not aggressive towards humans, but if they are encountered avoid the snake and do not provoke it. If bitten by a snake that may be venomous seek medical treatment.

The following table outlines safety controls to reduce the hazard associated with venomous snakes.

Elimination	Substitution	Engineering	Administrative	PPE
Use mechanical equipment to remove overgrown vegetation		Remove debris piles, overgrowth and excessive vegetation from walkways and work areas (provide safe access)	Train personnel on the identification of venomous snakes. Areas of vegetation overgrowth and/or debris piles should be considered "high risk" areas	If working in area with snakes cannot be avoided, wear snake chaps
			Instruct personnel to not disturb snakes if they identify one in their work area	

Elimination	Substitution	Engineering	Administrative	PPE
			Use caution when moving staged tools or materials into which snakes may have moved	

4.10.4 Poisonous Plants and Plant Hazards

Poison ivy and poison oak may be present at the Site. Poison ivy thrives in all types of light and usually grows in the form of a trailing vine; however, it can also grow as a bush and can attain heights of 10 feet or more. Poison ivy has pointed leaves that grow in clusters of three. Poison oak resembles poison ivy except that the poison oak leaves are more rounded rather than jagged like poison ivy, and the underside of poison oak leaves are covered with hair.

The skin reaction associated with contacting these plants is caused by the body's allergic reaction to toxins contained in oils produced by the plant. Becoming contaminated with the oils does not require contact with just the leaves. Contamination can be achieved through contact with other parts of the plant such as the branches, stems or berries, or contact with contaminated items such as tools and clothing. The allergic reaction associated with exposure to these plants will generally cause the following signs and symptoms:

Symptoms

- Blistering at the site of contact, usually occurring within 12 to 48 hours after contact and in many cases, persons experience almost immediate irritation.
- Reddening, swelling, itching, and burning at the site of contact.
- Pain, if the reaction is severe.
- Conjunctivitis, asthma, and other allergic reactions if the person is extremely sensitive to the poisonous plant toxin.

Prevention

- The best treatment appears to be removal of the irritating oil before it has had time to cause inflammation by wiping exposed skin with rubbing alcohol followed by washing with soap and water.
- A visual Site inspection and identification of the plants should be completed prior to starting work so that all individuals are aware of the potential exposure. Avoid contact with any poisonous plants on the Site, and keep a steady watch to identify, report, and mark poisonous plants found on the Site.
- Avoid contact with, and wash daily, contaminated tools, equipment, and clothing.
- Barrier creams (Ivy Block®) and orally administered desensitization may prove effective and should be tried to find the best preventive solution.
- Keeping the skin covered as much as possible (*i.e.*, long pants and long-sleeved shirts) in areas where these plants are known to exist will limit much of the potential exposure. PFAS-free spun polypropylene coveralls or Tyvek® may be worn to prevent contact of skin and clothes with poison ivy.

The following table outlines safety controls to mitigate the hazards associated with poisonous plants.

Elimination	Substitution	Engineering	Administrative	PPE
Use mechanical equipment to remove overgrown vegetation		Remove overgrowth and excessive vegetation from walkways and work areas (provide safe access)	Train personnel on the identification of poisonous plants	Wear pants and long sleeves when working in overgrown areas
			Instruct personnel to avoid areas where poisonous plants have been identified	Consider the use of a coverall when working in areas where these plants are present, especially for hypersensitive employees.
			Provide isopropyl alcohol along with soap and water to remove oils from skin, tools, and equipment.	

4.11 Working Alone

As outlined in [Section 4.1](#), working alone while on the EAP must be pre-approved by the POC. Working alone is prohibited for tasks deemed to be high risk by DMG including, but not limited to, handling highly hazardous chemicals (sulfuric acid), work over/near water, excavation and trenching, hot work (grinding, welding and torch cutting), and elevated work that requires personal fall arrest. Third-party contractors are responsible for identifying potential high-risk tasks in their Safety and Health Plan and requiring that a buddy system be implemented while high risk work is performed. The buddy must be located in a safe area but may perform other tasks that do not prevent observing the person performing high risk work. Working alone may occur on and around other parts of the EAP when there is no drowning hazard or risk of severe injury due to high-risk work.

Elimination	Substitution	Engineering	Administrative	PPE
	Modify work methods by substituting lower hazard methods for high hazard methods	Varies depending on the hazard, but for example, could include installing guardrails (temporary or permanent) which mitigates a fall hazard reducing the risk to levels where working alone may be permitted	Prohibit working alone on ash ponds and for other high hazard tasks without prior approval from the POC	
			Implement a buddy system whenever feasible (required for high hazard work)	

Elimination	Substitution	Engineering	Administrative	PPE
			Implement a worker check-in, emergency alerting, and monitoring system	

5. HAZARD COMMUNICATION

As required by 35 I.A.C. § 845.530, the OSHA HAZWOPER standards (29 C.F.R. § 1910.120 and 29 C.F.R. § 1926.65) and OSHA Hazard Communication Standard, site personnel, subcontractors, and visitors must be informed of chemical hazards associated with their work area. The information in this section is based on:

- Recommendations in the most recent “NIOSH Pocket Guide to Chemical Hazards” by the Department of Health and Human Services, Centers for Disease Control and Prevention, and the NIOSH Pocket Guide.
- Requirements set forth in the OSHA regulations from as defined in Chapter 17 of 29 C.F.R. § 1910.1200(c) for all hazards not otherwise classified.

5.1 Coal Combustion Residuals

Primary exposure to CCR is through inhalation and skin contact. CCR is typically a fine, black, grey, or tan particulate. CCR is comprised of several components. The following table outlines the components of the CCR. The exact percentage of each component will vary based on the type of ash and location at the surface impoundment.

Chemical	Percentage	PEL	IDLH	ACGIH TLV	Symptoms of Exposure & Health Effects
Crystalline Silica	20-60% (total)	0.05 mg/m ³ (respirable)	25 mg/m ³ (respirable)	0.025 mg/m ³ (respirable)	Cough, dyspnoea (breathing difficulty), wheezing; decreased pulmonary function, progressive respiratory symptoms (silicosis); irritation eyes; [potential occupational carcinogen]
Iron oxide	1-10%	5 mg/m ³	2500 mg/m ³	5 mg/m ³	Benign pneumoconiosis with X-ray shadows indistinguishable from fibrotic pneumoconiosis (siderosis)
Calcium oxide	10-30%	5 mg/m ³	25 mg/m ³	2 mg/m ³	irritation eyes, skin, upper respiratory tract; ulcer, perforation nasal septum; pneumonitis; dermatitis
Titanium dioxide	<3%	15 mg/m ³	ND	10 mg/m ³	Lung fibrosis; [potential occupational carcinogen]
Aluminosilicates	10-60%	15 mg/m ³ (PNOR)	ND	10 mg/m ³ (PNOR)	irritation eyes, skin, throat, upper respiratory system
Magnesium oxide	2-10%				
Magnesium dioxide	<2%				
Phosphorous pentoxide	≤2%				
Sodium oxide	1-10%				
Potassium oxide	≤1%				
Bromide salt	<0.1%				

Footnotes:

All values are 8-hour time-weighted averages (TWAs) unless otherwise indicated.

- PEL: Permissible Exposure Limit, the concentration an employee may be exposed to for an 8-hour work day for a 40-hour work week for which nearly all employees may be repeatedly exposed without adverse health effects.
- IDLH: IMMEDIATELY Dangerous to Life and Health, contaminant concentration which present the possibility for severe health consequences if exposed to the IDLH concentration without the appropriate personal protective equipment (PPE).
- ACGIH TLV: American Conference of Governmental Industrial Hygienists Threshold Limit Value
- mg/m³ = milligrams per cubic meter of air
- PNOR: Particulates Not Otherwise Regulated
- ND: Not Determined

5.2 Safety Data Sheets

Pursuant to 35 I.A.C. § 845.530(b)(3), DMG will provide Safety Data Sheets (SDSs) to all employees, contract workers, and third-party contractors for the CCR located in the plant closure office trailer. Third-party contractors will provide SDSs to the POC prior to bringing a material on site. SDSs are provided in Appendix E.

5.3 Signage

The absence of any of the following signage does not mean that a potential hazard does not exist. Signage will be posted by DMG, but employees, contract workers, and third-party contractors must remain vigilant for changing site conditions.

To aid in hazard communication and pursuant to 35 I.A.C. § 845.530(f), DMG will post the following signs at the EAP:

- Signs identifying the hazards of CCR, including dust inhalation when handling CCR.
- Signs identifying unstable CCR areas that make the operation of heavy equipment hazardous.
- Signs identifying the necessary safety measures and necessary precautions, including the proper use of PPE.

The following signs may also be posted at the CCR units to aid in hazard communication:

- Overhead electrical lines that may be struck by heavy equipment of vehicles will have signs warning drivers of their presence.

6. EMERGENCY RESPONSE PLAN

This emergency response section details actions to be taken in the event of site emergencies. This section is consistent with the EAP Emergency Action Plan. All personnel on site must be familiar with emergency signals and the content of this section.

6.1 Emergency Phone Numbers & Notifications

Emergency Number		
Site Address	Emergency Phone Number	
13498 E 800th St Hennepin, IL 61327	911	
Security (24/7): 309-660-7153 (m)		
Medical Treatment		
Local Hospital	Phone Number	
St. Margaret's Hospital 600 East 1st Street Spring Valley, IL 61362	815-664-5311	
Incident Notifications		
Title	Name	Contact Number
POC	Jason Stuckey	815-719-0540

6.2 Evacuation Signal

Upon hearing verbal notification to evacuate all personnel will leave the work area and proceed to the muster point.

6.3 Muster Point

The muster point for the EAP is the flagpole in front of the Main Plant. The following locations are acceptable severe weather shelter locations near the EAP:

- The stairwell inside the front door of the Main Plant
- The breakroom on the 2nd floor of the Main Plant

The muster point and severe weather shelter locations will be communicated during the Site Orientation Training.

6.4 Calls for Emergency Support

In the case of an emergency, site personnel will call 911. Security will coordinate the arrival of on-site emergency personnel. The individual calling for emergency support will briefly explain the nature of the emergency and site conditions as follows:

- Indicate his/her name
- Location of emergency
- Description of emergency conditions that may require special rescue equipment, such as confined spaces, excavations, and elevated work platforms
- Potential chemical hazards and recommended PPE

6.5 Fire & Explosion Response Plan

Trained site personnel may respond to incipient stage fires using a 20-pound Type ABC dry chemical fire extinguisher or hose. An incipient stage fire is a fire which is in the initial or beginning stage and which can be controlled or extinguished by portable fire extinguishers, Class

II standpipe or small hose systems without the need for protective clothing or breathing apparatus. Personnel shall only attempt to extinguish the fire if it is safe to do so.

A fire that CANNOT be readily extinguished with a fire extinguisher will require evacuation of the work area personnel to Muster Point areas per this Safety and Health Plan. If personal injuries result from any fire or explosion, the procedures outlined in the Personal Injury Response Plan will also be followed.

All fires or explosions must be reported to the contacts outlined in [Section 6.1](#) of this Safety and Health Plan.

6.6 Injury Response Plan

Treatment for minor injuries will be provided on site using available first aid supplies and personnel trained in first aid. All third-party contractors must have at least one individual on site who is trained in first aid, CPR, and AED use. Third-party contractors must provide their own first aid kits and AED. For minor injuries that are not life-threatening but require further medical attention, employees should be treated by occupational physicians at occupational clinics whenever possible. Treatment of minor injuries by emergency room or personal physicians should be avoided. When injured workers are released back to work with restrictions, all subcontractors are expected to accommodate those restrictions.

Emergency medical incidents include puncture wounds to the head, chest, and abdomen, serious head and spinal cord injuries, and loss of consciousness must be treated at the hospital emergency room listed in [Section 6.1](#) of this Safety and Health Plan.

All injuries must be reported to the contacts outlined in [Section 6.1](#) of this Safety and Health Plan.

6.7 Spill Response Plan

In general, DMG employees, contract workers, and third-party contractors are trained and equipped to handle small spills associated with their work. Third-party contractors must include an approved spill response plan in their Safety and Health Plan. Site personnel will generally respond to spills as follows:

- Stop the leak immediately if it can be done without directly contacting the leaking material.
- Remove or stop all ignition sources (hot work, generators, etc.) that are within 25 feet of any part of the spill.
- On-site personnel should immediately secure the area to prevent unauthorized entry into the spill area.
- Although not likely given the anticipated types of spills, site personnel must immediately initiate evacuation if a spill may cause an explosion, death, or serious injury.
- Site personnel may only respond to incipient stage fires regardless if such fires are associated with a spill.
- PPE for spills to open areas generally requires Modified Level D PPE (poly-coat Tyvek®, nitrile gloves, and boot covers or boot decontamination). Over-boots or boot covers may also be used if persons cleaning the spill would have to walk on spilled materials. Latex gloves are not acceptable and will degrade with exposure to petroleum products.

6.8 CCR Spill or Release Response Plan

Response to minor or incidental spills of CCR will be managed as outlined in the General Spill Response Plan. An incidental release is a release of a hazardous substance which does not pose a significant safety or health hazard to employees in the immediate vicinity or to the employee cleaning it up, nor does it have the potential to become an emergency within a short time frame. Incidental releases are limited in quantity, exposure potential, or toxicity and present minor safety or health hazards to employees in the immediate work area or those assigned to clean

them up. An incidental spill may be safely cleaned up by employees who are familiar with CCR. Response to major releases of CCR will be in accordance with the HPP Emergency Action Plan, which can be found on the Luminant CCR website at <https://www.luminant.com/ccr/>.

6.9 Ash Pond Rescue




Ash ponds may be unstable and represent an engulfment hazard if persons and equipment traverse the surface, berms, or other unstable areas. Special training is required on behalf of emergency responders to retrieve persons and equipment who become trapped in unstable ash. **Untrained persons must not enter unstable areas** in an attempt to conduct rescue because of the significant potential that they will also become victims. Call the HPP emergency number and state that an "ash pond rescue" is required. The HPP emergency contact will notify the designated service to perform the ash pond rescue. On-site personnel should remain on stand-by to support the ash pond rescue team as necessary.

6.10 Incident Reporting

All incidents must be reported to the contacts outlined in [Section 6.1](#) of this Safety and Health Plan. An Incident Report must be completed for all injuries, illnesses, spills, fire, explosion, or property damage. The absence of an injury does not preclude the need to complete an Incident Report as such incidents will be classified as "near miss" or "other." It will include, but is not limited to, the nature of the problem, time, location, and corrective actions taken to prevent recurrence.

APPENDIX A
SITE MAP



-  PART 845 REGULATED UNIT (SUBJECT UNIT)
-  SITE FEATURE
-  PROPERTY BOUNDARY



SITE MAP

PART 845 SAFETY AND HEALTH PLAN
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS

APPENDIX A

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.



APPENDIX B
SAFETY AND HEALTH PLAN ACKNOWLEDGMENT FORM

APPENDIX C
DRUG SCREEN POLICIES AND SUPPLEMENTAL TERMS



Drug and Background Investigations

Contractor is solely responsible for ensuring that all members of Contractor Project Team have completed and passed all drug and alcohol tests and background investigations required under this Attachment and under Contractor's own programs before assigning such personnel to perform Work. Contractor is also solely responsible for ensuring that such testing and investigations are performed in accordance with all applicable laws.

- 1. Required Investigations.** Except as otherwise required by applicable law, Required Investigations shall consist of all of the following:
 - 1.1** a 7-panel drug screening;
 - 1.2** a background investigation that includes a criminal records check in all counties where the applicable person has resided for at least the last seven (7) years;
 - 1.3** a third-party verification of previous employment and the highest education level completed by the applicable person;
 - 1.4** a check of the National Sex Offender Registry and Terrorist Watch List (Denied Parties); and
 - 1.5** a check of Motor Vehicles Record (if work to be performed by the applicable person requires driving as part of the defined duties).
- 2. Notices to Tested Persons Regarding Background Checks.** All background checks will be conducted in compliance with applicable provisions of the Fair Credit Reporting Act.
- 3. Forms and Testing Organization for Drug Tests.** Except for those positions subject to Department of Transportation ("DOT") drug and alcohol testing regulations, all drug testing shall be performed using the Universal Toxicology four part "Non-DOT" Chain of Custody and Request Form with white and blue top page, and shall be conducted by an independent third-party organization.
- 4. Pass/Fail Standards – Background Checks.** A person shall be deemed to have failed the applicable background check if:
 - 4.1** information is reported through the background check process indicating that such person has failed to disclose or misrepresented information requested at any time about such a person's criminal background history; or
 - 4.2** such person has ever committed any felony constituting a violent crime, crime against a person, sexual offense or fraud; or
 - 4.3** such person has committed any other felony, or has been incarcerated for a felony, within ten (10) years prior to the date of such background check (i.e., for these felonies there must be a ten (10) year lapse in time from the later of the commission and the end of any period of incarceration); or
 - 4.4** such person has committed any misdemeanor that:
 - 4.4.1** involves violence that is sexually related; or

- 4.4.2 consists of a DUI that is the second (or more) DUI in the last two (2) years prior to the date of the background check; or
- 4.4.3 consists of a theft-related offense; provided that there can be no more than one theft by check and it must have been for an amount less than \$100; or
- 4.4.4 consists of any drug-related misdemeanor committed at any time within forty-eight (48) months prior to the date of the background check.

4.4 For purposes of both felonies and misdemeanors, a person is deemed to have committed the applicable offense if he/she is convicted or enters a plea of guilty or nolo contendere for such offense (to include, without limitation, sentences of probation and deferred adjudication).

5. **Pass/Fail Standards – Drug Tests.** A person shall be deemed to have failed the applicable drug test if any of the following maximum cut-off levels are exceeded, unless there is a legitimate medical explanation for the presence of a tested substance at or above the applicable cut-off level:

- 5.1 Amphetamines 500ng/mL
- 5.2 Barbiturates 150ng/mL
- 5.3 Benzodiazepines 150ng/mL
- 5.4 Cocaine 150ng/mL
- 5.5 Marijuana 150ng/mL
- 5.6 Opiates 2000ng/mL
- 5.7 Phencyclidine 25ng/mL

For any positions subject to DOT drug and alcohol testing requirements, testing shall be conducted according to the applicable DOT panel and cutoff levels.

6. **Other Requirements.**

- 6.1 Background checks and drug tests will be paid for by Contractor without reimbursement by Company.
- 6.2 Contractor will keep background checks and drug test records while the applicable persons are working pursuant to this Agreement and for three (3) years thereafter.
- 6.3 Upon request, Contractor will provide a certification to Company that no person required hereunder to pass a background check or drug test has failed such investigation or test. Contractor will not provide the specific results of the background check or drug test of any individual to Company.
- 6.4 If any person required under this Agreement to pass a background check or drug test fails such check or test, Contractor will not report the specific results of such check or test to Company and will not allow such individual to perform any Work for Company. Although such person may not be assigned to perform any Work for Company, nothing in this Attachment requires Contractor to take any other action with respect to such person's employment with Contractor.



Supplemental Terms for Onsite Services

1. SAFETY

- 1.1 Contractor agrees that any safety-related assistance or initiatives undertaken by Company will not relieve Contractor while on Company Property from responsibility for the implementation of, and compliance with, safe working practices, as developed from their own experience, or as imposed by law or regulation, and will not in any way, affect the responsibilities resting with Contractor under the provisions of any agreement to which these policies are attached and to meet all safety requirements as specified by the Occupational Safety & Health Administration (OSHA), the Mine Safety Health Administration (MSHA), including the "Mining Contractor Safety Reference Handbook" located at http://www.vistraenergy.com/wp-content/uploads/2016/12/Contractors-Safety-Handbook_Final-MC-08262016.pdf, the Department of Transportation (DOT) and any other applicable state or federal safety and health laws or regulations.
- 1.2 In the event that a material safety data sheet, warning label, or other documentation concerning the use of hazardous chemicals at any property owned or controlled by Company or any of its affiliates (collectively, "**Company Properties**"), applies to any materials or equipment provided by Contractor as an aspect of the Work, such documentation will be provided by Contractor to Company prior to the commencement of any such Work.
- 1.3 Contractor will report to Company all accidents involving personal injuries (including death) and damage to property occurring directly or indirectly as a result of the Work performed by Contractor hereunder immediately, but in no event, no later than 24 hours after the occurrence of any such accident. Any accident or incident occurring directly or indirectly as a result of the Work which Contractor must report to a regulatory agency (e.g. OSHA, MSHA, TCEQ) must also be reported to Company immediately following notification to the regulatory agency.

2. SECURITY

- 2.1 It will be the affirmative duty of Contractor to ensure that Contractor Group assists in carrying out all security measures, to include reporting all information or knowledge of matters adversely affecting security to Company's designated security personnel.
- 2.2 Company reserves the right to exclude any of Contractor's employees from any Company Property by denial of access, suspension or revocation of access authorization, preemptory expulsion, or by any other means, without notice or cause. Former Company employees, and any of Contractor's employees who previously have been excluded from any Company Property, may be brought onto Company property or facilities only if prior approval from Company is obtained. If Contractor terminates a member of Contractor Group performing Work on Company's premises, Contractor shall inform Company immediately, but in no event, no later than twenty-four (24) hours after such employee is terminated in order for Company to remove access to Company Property for such employee.
- 2.3 Company measures may also include investigations, whether by Company or law enforcement officials. Contractor agrees to cooperate in such investigations and understands that Company

reserves the right to require anyone in Contractor Group to authorize appropriate agencies to release his or her criminal records to Contractor as a condition of either initial or continued permission for access to any Company Property. Investigations may include searches of Contractor Group. Such searches may include searches of facilities assigned to Contractor Group, search of all Company Property areas and property at such Company Property areas, searches of including, but not limited to, offices, lockers, desks, lunch boxes, packages and motor vehicles (regardless of ownership). Without limiting the foregoing, Contractor acknowledges and agrees that all members of Contractor Group, to the extent that Company reasonably determines that such members require security badge access prior to entering onto any Company Property, shall be required to comply with Company's standard security badge requirements, including without limitation a background check to be performed by Company.

3. ISNETWORLD

- 3.1 Contractor agrees to maintain at Contractor's expense a subscription with ISNetworld (www.ISNetworld.com), Company's safety compliance program or any replacement program therefor, as directed by Company, for the Term of the Agreement. Contractor shall also furnish ISNetworld with any information requested by ISNetworld relating to ISNetworld's evaluation of the Contractor's safety program and practices. As a minimum, requested documents will be related to safety, health, and insurance (i.e., regulatory required training, certifications, safety plans, safe and secure workplace practices, insurance certificates, etc.), OSHA and MSHA injury rates and Experience Modification Rate (EMR).
 - 3.2 Contractor has and during the performance of this Agreement shall continue to report full, complete and accurate information to ISNetworld concerning Contractor's employees.
4. **MATERIALS, EQUIPMENT AND LABOR.** Contractor will be solely responsible for the proper storage, transportation and disposal of any product or waste, other than sandblasting waste, used or generated in connection with the Work in accordance with all applicable Environmental Laws. Contractor will dispose of all waste materials, other than sandblasting waste, at an off-site disposal facility approved for such waste materials pursuant to applicable Environmental Laws and will complete and sign all waste manifests as the generator of such waste. Company will be responsible for the storage, transportation and disposal of any sandblasting waste generated during the performance of the Work.

5. CONDITIONS AFFECTING WORK

- 5.1 Contractor will investigate and acquaint itself with the conditions affecting the Work, including but not limited to those related to the transportation, disposal, handling and storage of materials and waste; availability of labor, water, electric power and roads; the uncertainties of weather, river stages or similar physical conditions at the site; the conformation and condition of the ground; and the character of equipment and facilities needed preliminary to and during prosecution of the Work. Contractor has satisfied itself as to the character, quality and quantity of surface and subsurface materials or obstacles to be encountered. Contractor's failure to acquaint itself with any conditions affecting the Work or any available related information will not relieve it from responsibility for properly estimating the difficulty or cost of successfully performing the Work.
- 5.2 Contractor assumes full responsibility for investigating conditions and determining the existence and magnitude of any hazards to the physical well-being of property of Contractor, the employees, agents, and servants of Contractor, or any other person or entity who is or may become involved in

the performance of Work, and any and all other persons in the vicinity of the Work. Contractor will advise all of the above-specified persons or entities of any hazards relating to Work, and will ensure that those persons or entities are advised of and fully understand the nature of the hazards and safety precautions that can be taken to eliminate or minimize dangers relating to the hazards.

- 5.3 Contractor will provide information to Company regarding hazardous chemicals and/or consumable products that contain constituents listed in 40 CFR 372.65 used at any Company Property. Contractor will report the amount of such material carried on and off the site, the amount actually used and the manner of use. Contractor will provide the maximum quantity of the material stored on site at any one time and if a waste material was collected, where it was disposed of (location name and address). Contractor will provide information on the amount of material used for the previous calendar year by the first of February.
- 5.4 Contractor will use its best efforts to ensure that the Work is performed so as to minimize any adverse impact upon natural resources and the environment and will use best industry practices in this regard at all times.
- 5.5 Contractor acknowledges and agrees that all members of Contractor Group performing Work at any Company Generation or Mining Property are required to view Company's "Contractor/Visitor Safety Orientation" video (in the case of Company Generation property), when applicable, and to read and adhere to Company's "Contractor/Visitor Safety Booklet" (in the case of Company Mining property) prior to performing any Work at any Company Generation or Mining Property.
- 5.6 Contractor will immediately notify Company as soon as Contractor has reason to believe that Contractor, or any employee or other person performing the Work, is not or may not be performing the Work in compliance with applicable Environmental Laws. Contractor will provide Company with written notice to Company of such actual or potential non-compliance within three (3) days following the discovery thereof. Contractor will take immediate steps to ensure compliance with all applicable Environmental Laws and will, if directed by Company, cease all Work until authorized by Company to resume the Work.
- 5.7 Contractor will report to Company all accidents involving personal injuries (including death) and damage to property occurring directly or indirectly as a result of the Work performed by Contractor hereunder immediately, but in no event, no later than 24 hours after the occurrence of any such accident. Any accident or incident occurring directly or indirectly as a result of the Work which Contractor must report to a regulatory agency (e.g. OSHA, MSHA, TCEQ) must also be reported to Company immediately following notification to the regulatory agency.

6. WORK SITE PERMITS AND LICENSES

- 6.1 Subject to the following two paragraphs, Contractor will obtain, prior to the commencement of the Work, and provide to Company upon request, all permits, licenses and governmental authorizations, at its sole expense, required for the performance of the Work. Contractor will be solely responsible for maintaining compliance with such permits, licenses and governmental authorizations.
- 6.2 In the event that a storm water discharge permit is required for the performance of the Work, (i) Contractor will be responsible for filing a Notice of Intent with respect to the Work, in addition to any Notice of Intent that Company may be required to file, and (ii) Contractor will coordinate with

Company in the preparation and execution of a Storm Water Pollution Prevention Plan for the Work Site.

- 6.3 In the event that the performance of the Work involves the handling or abatement of asbestos-containing materials, Contractor will coordinate with Company in the preparation and filing of all required notification forms.
7. **ACCESS.** Should Contractor desire access to the Work Site over any land not controlled by Company, it will, at its sole expense, obtain all proper permits or written permission necessary for that access.
8. **COMPANY FACILITIES.** Contractor will not use Company's sanitary facilities, changehouses, shops, parks, storage buildings, tools, equipment or other facilities unless so directed by Company. Contractor will not discharge, without Company's prior written authorization, any product or waste used or generated in connection with the Work through any (i) Company-permitted outfall, (ii) Company-owned or operated pollution control equipment, or (iii) storm or sanitary sewer located at or in the vicinity of the Work Site. Any request for authorization to discharge will include, at a minimum, either a copy of the Material Safety Data Sheet for the product or a written description of the waste, including a list of the constituents of the waste and the relative concentrations thereof.

9. ENVIRONMENTAL

- 9.1 In the event that Contractor discovers during the performance of the Work any substance at the Work Site that is not the subject of the Work or has not otherwise been identified by Company for Contractor, which substance Contractor has reason to believe is or may be a Hazardous Substance that (i) has been or may be released or spilled into the soil, surface water, or groundwater or in a building or structure, or (ii) consists of asbestos-containing materials, lead-based paint, batteries, thermostats, lighting equipment, or equipment containing polychlorinated biphenyls, Contractor will immediately stop Work and notify Company of the discovery. Contractor will not resume the Work until receiving authorization from Company to do so.
- 9.2 The term "**Hazardous Substance**" means any product, waste, emission or substance defined, listed or designated as a hazardous or toxic substance, hazardous waste, hazardous material or pollutant by or pursuant to any Environmental Law and includes, but is not limited to, any petroleum-based product, substance or waste, including any additives associated therewith, pesticides, fertilizers, solvents, polychlorinated biphenyls, mercury, lead, lead-based paint, asbestos-containing material or explosives.
- 9.3 Contractor will immediately notify Company in the event of a spill or release of any material which Contractor knows or has reason to believe is a Hazardous Substance, whether onto the ground, into any body of water, a storm or sanitary sewer, or the air, or anywhere on property owned or controlled by Company, including within any building or structure. Contractor will be solely responsible, as may be required by applicable Environmental Laws, for, in consultation with Company, (i) notifying the appropriate governmental agencies of such spill or release caused or permitted by the acts or omissions of Contractor and (ii) for the cleanup and remediation of such spill or release.
10. **PROTECTION OF HIGHWAYS AND RAILROADS.** Contractor will make suitable arrangements with governmental authorities and railroads for the construction of all structures, whether underneath or over roads, railroads or rights-of-way to protect the public from accident or delay. Contractor will repair, at its

own expense, to the satisfaction of the governmental authorities or other owners, all roads, railroads and bridges that may be damaged by, or given undue wear due to the Work.

11. CLEANING UP

11.1 Contractor will at all times keep the Work Site free of waste materials or rubbish caused by the Work. After completing the Work, Contractor will remove all its waste materials, rubbish, tools, supplies, equipment and surplus materials from and about the Work Site.

11.2 If Contractor fails to keep the Work Site clean or to clean up after completing the Work, Company may do so and charge all costs of cleaning up to Contractor. Those costs may be deducted from the final payment to Contractor.

12. COLLATERAL WORK. Company and other contractors may be working at the Work Site. Company reserves the right to coordinate the performance of Contractor's Work with the work of others. Contractor will cooperate with and will not delay, impede or otherwise impair the work of others. Company does not guarantee Contractor continuous uninterrupted access to the Work Site, but will provide such access as good construction practices will allow, considering the other activities in the area.

13. ALCOHOLIC BEVERAGES, DRUGS AND WEAPONS. Contractor will inform all members of Contractor Group who may be involved in the performance of any Work of the following Company rules relating to alcoholic beverages, drugs and weapons, with which all personnel are expected to comply:

13.1 Bringing, attempting to bring, possessing, using or being under the influence of intoxicants, drugs, or narcotics while on any Company Property, including but not limited to parking areas, is prohibited. Possessing alcoholic beverages in sealed containers is permitted, however, in designated parking areas.

13.2 Prescription or over-the-counter medications that could affect the performance of safety-sensitive work are allowed on Company Property only if they have been previously cleared by Contractor. Contractor must confirm that the medication and dosage do not impair an individual's ability to perform safety-sensitive work before clearing the individual to perform such work while under the influence of the medication.

13.3 Bringing, attempting to bring, possessing or using firearms, whether classified as legal or illegal, while on any Company Property, including but not limited to buildings, parking areas, recreation facilities, equipment and vehicles, is prohibited, unless otherwise required by applicable law. Use or possession of firearms for specific situations is permitted if approved by function or higher level management of Company.

13.4 Off-the-job involvement with intoxicants, illegal drugs, or illegal narcotics that adversely affects Company's business, to include impairing the individual's ability to perform his job or the public trust in the safe operation of Company, is prohibited.

13.5 Any conduct on any Company Property which is in violation of any state or federal law or regulation is considered a violation of these rules and a breach of any agreement to which these policies are attached.

- 13.6** In order to enforce these rules, all individuals with access to any Company Property as well as the vehicles, offices, lockers and any personal belongings of such individuals on any Company Property are subject to search by Company and its agents, to include security representatives appointed or employed by Company. Individuals may be required to take a blood, urinalysis or Breathalyzer test, or submit to other recognized investigatory tests or procedures as are deemed appropriate or necessary by Company in the investigation of a violation of these rules.
- 14. TITLE AND RIGHT.** Nothing in the Agreement will vest Contractor with any right of property in materials used after they have been attached to or incorporated into the Work, nor materials for which Contractor has received full or partial payment. All those materials, upon being so attached, incorporated or paid for, will become the property of Company. Any gravel, sand, stone, minerals, timber or other materials excavated, uncovered, developed or obtained in the Work, or on any land belonging to Company may be used, in the performance of the Work, provided such materials meet the requirements of this Agreement. Any objects or natural materials or animals excavated or exposed that may have historical significance or constitute a threatened or endangered species must be brought to the attention of Company.

15. PROTECTION AGAINST LIENS AND ENCUMBRANCES

- 15.1** Contractor will not at any time permit any lien, attachment or other encumbrance ("**Encumbrance**") by any person or persons whosoever or by reason of any claim or demand against Contractor to be placed or remain on the property of Company, including, but not limited to, the Work Site upon which Work is being performed or equipment and materials that are being furnished. To prevent an Encumbrance from being placed on the property of Company, Contractor will furnish during the progress of any Work, as requested from time to time, verified statements showing Contractor's total outstanding indebtedness in connection with the Work.
- 15.2** If Contractor allows any indebtedness to accrue to subcontractors or others and fails to pay or discharge that indebtedness within five (5) days after demand, then Company may withhold any money due Contractor until that indebtedness is paid or pay the indebtedness and apply that amount against the money due Contractor.
- 15.3** If Contractor allows any Encumbrances, whether valid or invalid to be placed on the property of Company, any and all claims or demands for payment to Contractor will be denied by Company until the Encumbrance is removed. If the Encumbrance is not removed immediately, Company may pay that claim or demand and deduct the amount paid, together with all related expenses, including attorneys' fees, from any further payment due Contractor, or at Company's election, Contractor will, upon demand, reimburse Company for the amount paid and all related expenses. Any payment made in good faith by Company will be binding on Contractor.

16. TERMINATION FOR DEFAULT

- 16.1** If a petition in bankruptcy should be filed by Contractor, or if Contractor should make a general assignment for the benefit of creditors, or if a receiver should be appointed due to the insolvency of Contractor, or if Contractor should refuse or fail to supply enough properly skilled workmen or proper equipment, materials or services or should fail to make prompt payment to subcontractors, or to pay promptly for materials or labor, or disregard laws, ordinances or the instruction of Company's Contract Coordinator, or if Contractor should refuse or fail to abide by the SOW Construction Schedule or otherwise violate any provisions of the Agreement or SOW, then Company, upon a

determination by Company's Contract Coordinator that sufficient cause exists to justify such action, may, without prejudice to any other right or remedy available to it after giving Contractor seven (7) days' written notice, terminate the Agreement or the SOW and take possession of the Work Site. In the event of such a termination, Company may use all or part of Contractor's equipment and materials and may finish the Work by whatever method Company may deem expedient. In such event, Contractor will not be entitled to receive any further payment hereunder until the Work is finished. If the unpaid balance of the SOW fees will exceed the expense of finishing the Work, including compensation of Company's Contract Coordinator, other Company personnel, third party engineering companies, or other contractors for additional services, such excess will be paid to Contractor. If the expense of finishing the Work will exceed such unpaid balance, Contractor will pay the difference to Company within fifteen (15) days of receiving an invoice for same. The expenses incurred by Company herein, and the damage incurred through Contractor's default, will be determined by Company's Contract Coordinator, in its sole discretion, and such determination will be binding as between the parties.

- 16.2** In the event of a termination under the provisions of this Section 3, Contractor will transfer and assign to Company, in accordance with Company's instructions, all Work, all construction records, reports, permits, data and information, other materials (including all Company-supplied materials), supplies, Work in progress and other goods for which Contractor is entitled to receive reimbursement hereunder, and any and all plans, drawings, sketches, specifications, and information in connection with the Work, and will take such action as may be necessary to secure Company, at Company's sole election, the rights of Contractor under any or all orders and subcontracts made in connection with the Work.
- 16.3** In the event that Company so directs or authorizes, Contractor will sell at a price approved by Company, or retain at a mutually agreeable price, any such materials, supplies, Work in progress, or other goods as referred to in the preceding paragraph. In any event, Company will receive any and all records, plans, drawings, data, permits, specifications, sketches, reports, or other information relating to the Work. The proceeds of any such sale or the agreed price will be paid or credited to Company in such manner as Company may direct so as to reduce the amount payable by Company under this Section 3.

APPENDIX D
COVID-19 SITE ENTRY GUIDELINES



COVID-19 Vistra Site Entry Guidelines – Effective: June 17, 2021

These guidelines are applicable to ALL PERSONNEL entering Vistra work sites.

To enter a Vistra work site, each person must answer the following three questions with a “no” answer *and* pass the required temperature testing *unless* they display their Vistra vaccination sticker on their employee badge or hardhat:

Site Entry Questions:

1. In the past 10 days, have you tested positive for COVID-19 or are you currently waiting on test results?
2. In the past 10 days, have you been within six feet of someone, where masks were not worn, who:
 - a. has tested positive for COVID-19,
 - b. is known to be waiting on test results for COVID-19, or
 - c. is under a quarantine order?
3. In the past 10 days, have you or someone who has been within six feet of you where masks were not worn had:
 - a. flu-like symptoms,
 - b. a deep, dry cough,
 - c. recent shortness of breath or difficulty breathing,
 - d. new loss of taste or smell, and/or
 - e. fever of 100 degrees or above?

Temperature Testing:

You must register a temperature between 96- and 100-degrees Fahrenheit as described in the temperature procedures. (see next page for testing procedures)

- If your temperature is below 96 degrees, retest with a different device.
- If your temperature is 100-degrees Fahrenheit or above, retest on another device preferably an ear thermometer, if your temperature still registers 100-degrees Fahrenheit or above you may not enter the site.

Clearance to enter the site:

- If you have answered “no” to all three questions *and* passed the temperature test, you may enter the site.
- *If you have an approved Vistra vaccination sticker, you are cleared to enter the site without the temperature test or answering COVID screening questions.*
- If you passed the temperature test *and* answered “Yes” to any of the questions, but have been cleared through VistraTravelerSafety (HR clearance) to enter the Vistra work site for that instance of exposure, testing, or symptoms, you may enter the site.

Anyone *not* cleared to enter the work site must immediately leave the work site and notify their supervisor who will notify HR at VistraTravelerSafety@vistracorp.com for next steps.

Any symptomatic employee, unvaccinated employee exposed to COVID-19 or any employee tested for COVID-19 as described above must be cleared through VistraTravelerSafety prior to returning to work.

Required Temperature Testing Procedures:

All persons entering the site without a Vistra vaccination sticker, who have cleared all questions above, will also submit to temperature testing or self-administer a temperature test as required by the facility management. If a self-administered test is required, then a member of the management team or their designee will witness the testing; however, where that is not practicable, each person must attest that they are only entering the site premises because they have passed the screening questions and temperature test required for entry. Also:

- a. Hats may cause false high temperatures and should not be worn for five minutes immediately preceding a forehead temperature test.
- b. Each person is responsible for ensuring all self-testing materials and areas touched during testing are sanitized.
- c. All personnel should maintain a **distance of at least six feet** from other people during this process or wear required masks.

Temperature Testing Requirements:

1. **All persons entering the site without a Vistra vaccination sticker must register a temperature between 96- and 100-degrees Fahrenheit. Any such person who has a temperature not within that range or who triggers an alarm on a thermal camera must retest with a different device**, preferably an **ear thermometer**, if available. If the second test registers a temperature of 100 degrees or above:
 - a. That person **may not enter** the Vistra work site and must notify their supervisor, who will notify HR at VistraTravelerSafety@vistracorp.com for next steps.
 - b. If there is significant inconsistency between the two tests, repeat another temperature test and use the two closest readings.
2. **Anyone who registers a temperature between 96- and 100-degrees Fahrenheit may proceed to their work site.**
 - **If temperature is below 96 degrees, wait a few minutes and retest with a different device.**

Control rooms and communal areas:

All persons entering the site without a Vistra vaccination sticker should maintain at least six-foot distance from other people as much as possible and should wear face coverings when six-foot distance is not feasible. No one should gather in communal areas (including the temperature-testing area) without a Vistra vaccination sticker. Only operators are allowed in control rooms without plant manager approval.

Vistra Vaccination Sticker protocols:

All persons with a valid Vistra vaccination sticker do not have to socially distance or wear masks while at the site. They will also not be required to quarantine as a part of COVID-19 exposures unless exhibiting COVID-19 symptoms. To be eligible for these protocols, each person must have their approved Vistra vaccination sticker easily visible at all times while at work. If someone who has applied for a Vistra vaccination sticker believes they have specific health conditions that may affect the ability to have a full immune response to the vaccination, please consult your health provider prior to working without a mask.

Any symptomatic employee, unvaccinated employee exposed to COVID-19 or any employee tested for COVID-19 as described above must be cleared through VistraTravelerSafety prior to returning to work.

APPENDIX E
SAFETY DATA SHEETS

Safety Data Sheet

Section 1
Identification of the Substance and of the Supplier

1.1 Product Identifier

Product Name/Identification:	ASTM Bottom Ash
Synonyms:	Ash; Ashes; Ash residues; Ashes, residues, bottom; Bottom ash; Bottom ash residues; Coal Fly Ash; Pozzolan; Waste solids.
Formula:	UVCB Substance

1.2 Relevant Identified Uses of the Substance or Mixture and Uses Advices Against

Relevant Identified Uses:	Component of wallboard, concrete, roofing material, bricks, cement kiln feed.
Uses Advised Against:	None known.

1.3 Details of the Supplier of the SDS

Manufacturer/Supplier:	Dynegy, Inc.
Street Address:	601 Travis Street, Suite 1400
City, State and Zip Code:	Houston, TX 77002
Customer Service Telephone:	800-633-4704


Section 2
Hazards Identification

2.1 Classification of the Substance

GHS Classification(s) according to OSHA Hazard Communication Standard (29 CFR 1910.1200):

- Eye Irritant, Category 2A
- STOT-SE, Category 3 (Respiratory Irritation)
- Carcinogen, Category 1A
- STOT-RE, Category 1 (Lungs)
- Toxic to Reproduction, Category 2

2.2 Label Elements

<i>Labelling according to 29 CFR 1910.1200 Appendices A, B and C*</i>	
Hazard Pictogram(s):	
Signal word:	DANGER
Hazard Statement(s):	<p><i>Causes serious eye irritation.</i></p> <p><i>May cause respiratory irritation.</i></p> <p><i>May cause damage to lungs after repeated/prolonged exposure via inhalation.</i></p> <p><i>May cause cancer of the lung.</i></p> <p><i>Suspected of damaging fertility or the unborn child.</i></p>
Precautionary Statement(s):	<p><i>Obtain special instructions before use.</i></p> <p><i>Do not handle until all safety precautions have been read and understood.</i></p> <p><i>Avoid breathing dust.</i></p> <p><i>Wash thoroughly after handling.</i></p> <p><i>Do not eat drink or smoke when using this product.</i></p> <p><i>Wear protective gloves/protective clothing/eye protection/face protection.</i></p> <p><i>Use outdoors or in a well-ventilated area.</i></p> <p><i>If exposed or concerned: Get medical advice/attention.</i></p> <p><i>Store in a secure area.</i></p> <p><i>Dispose of product in accordance with local/national regulations.</i></p>

** Fly ash and other coal combustion products (CCPs) are UVCB substances (unknown or variable composition or biological). Various CCPs, noted as ashes/ash residuals; Ashes, residues, bottom; Bottom ash; Bottom ash residues; Waste solids, ashes under TSCA are defined as: "The residuum from the burning of a combination of carbonaceous materials. The following elements may be present as oxides: aluminum, calcium, iron, magnesium, nickel, phosphorus, potassium, silicon, sulfur, titanium, and vanadium." Ashes including fly ash and fluidized bed combustion ash are identified by CAS number 68131-74-8. The exact composition of the ash is dependent on the fuel source and flue additives composed of many constituents. The classification of the final substance is dependent on the presence of specific identified oxides as well as other trace elements.*

2.3 Other Hazards

Listed Carcinogens:

-Respirable Crystalline Silica

IARC: [Yes] NTP: [Yes] OSHA: [Yes] Other: (ACGIH) [Yes]

Section 3
Composition/Information on Ingredients

Substance	CAS No.	Percentage (%)	GHS Classification
Crystalline Silica	14808-60-7	20 - 40%	Repeat Dose STOT, Category 1 Carcinogen, Category 1A
Silica, crystalline respirable (RCS)	14808-60-7	See Footnote 1	Repeat Dose STOT, Category 1 Carcinogen, Category 1A
Aluminosilicates ²	Various, see Footnote 2	10 - 60%	Single Exposure STOT, Category 3
Calcium oxide (CaO)	1305-78-8	10 - 30%	Skin Irritant, Category 2 Eye Irritant, Category 1 Single Exposure STOT, Category 3
Iron oxide	1309-37-1	1 - 10%	Not Classified
Manganese dioxide (MnO ₂)	1313-13-9	<2%	Skin Irritant, Category 2 Eye Irritant, Category 2B
Magnesium oxide	1309-48-4	2 - 10%	Not Classified
Phosphorus pentoxide (P ₂ O ₅)	1314-56-3	≤2%	Skin Irritant, Category 2 Eye Irritant, Category 2B
Sodium oxide	1313-59-3	1 - 10%	Not Classified
Potassium oxide (K ₂ O)	12136-45-7	≤1%	Skin Irritant Category 2 Eye Irritant Category 2B
Titanium dioxide (TiO ₂)	13463-67-7	<3%	Not Classified
Bromide salt (calcium)	7789-41-5	See Footnote 3	Toxic to Reproduction Category 2

¹The percentage of respirable crystalline silica has not been determined. Therefore, a GHS classification of Carcinogen 1A has been assigned.

²Aluminosilicates (CAS# 1327-36-2) may be in the form of mullite (CAS# 1302-93-8); aluminosilicate glass; pozzolans (CAS# 71243-67-9); or calcium aluminosilicates such as tricalcium aluminate (C3A), or calcium sulfoaluminate (C4A3S). The form is dependent on the source of the coal and or the process used to create the CCP. Pulverized coal combustion would be more likely to create high levels of pozzolans. Aluminosilicates may have inclusions of calcium, titanium, iron, potassium, phosphorus, magnesium and other metal oxides.

³Analytical data are not available to demonstrate that the concentration of bromide salt is <0.1%; therefore, a GHS classification of Toxic to Reproduction Category 2 has been assigned.

Section 4
First Aid Measures

4.1 Description of First Aid Measures

Inhalation:	If product is inhaled and irritation of the nose or coughing occurs, remove person to fresh air. Get medical advice/attention if respiratory symptoms persist.
Skin Contact:	If skin exposure occurs, wash with soap and water.
Eye Contact:	If product gets into the eye, rinse copiously with water for several minutes. Remove contact lenses, if present and easy to do. Seek medical attention/advice if irritation occurs or persists.
Ingestion:	No specific first aid measures are required.

4.2 Most Important Health Effects, Both Acute and Delayed

Acute Effects: Direct exposure may cause respiratory irritation, eye irritation and skin irritation. The product dust can dry and irritate the skin and cause dermatitis and can irritate eyes and skin through mechanical abrasion.

Chronic Effects: Chronic exposure may cause lung damage from repeated exposure. Prolonged inhalation of respirable crystalline silica above certain concentrations may cause lung diseases, including silicosis and lung cancer. Repeated exposure to dusts containing inorganic bromide salts may affect fertility and/or result in effects to the unborn child.

4.3 Indication of Any Immediate Medical Attention and Special Treatment Needed

Seek first aid or call a doctor or Poison Control Center if contact with eyes occurs and irritation remains after rinsing. Get medical advice if inhalation occurs and respiratory symptoms persist.

Section 5
Firefighting Measures

5.1 Extinguishing Media

Suitable Extinguishing Media:	Product is not flammable. Use extinguishing media appropriate for surrounding fire.
Unsuitable Extinguishing Media:	Not applicable, the product is not flammable.

5.2 Special Hazards Arising from the Substance or Mixture

Hazardous Combustion Products:	None known.
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5.3 Advice for Firefighters

Special Protective Equipment and Precautions for Firefighters:	As with any fire, wear self-contained breathing apparatus (NIOSH approved or equivalent) and full protective gear.
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Section 6
Accidental Release Measures

6.1 Personal Precautions, Protective Equipment and Emergency Procedures

Personal precautions/Protective Equipment:	See Section 8.2.2 Individual Protective Measures. For concentrations exceeding Occupational Exposure Levels (OELs), use a self-contained breathing apparatus (SCBA).
Emergency procedures:	Use scooping, water spraying/flushing/misting or ventilated vacuum cleaning systems to clean up spills. Do not use pressurized air.

6.2 Environmental Precautions

Environmental precautions:	Prevent contamination of drains or waterways and dispose according to local and national regulations.
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6.3 Methods and Material for Containment and Cleaning Up

<p>Methods and materials for containment and cleaning up:</p>	<p>Do not use brooms or compressed air to clean surfaces. Use dust collection vacuum and extraction systems.</p> <p>Large spills of dry product should be removed by a vacuum system. Dampened material should be removed by mechanical means and recycled or disposed of according to local and national regulations.</p>
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See Sections 8 and 13 for additional information on exposure controls and disposal.

**Section 7
 Handling and Storage**

7.1 Precautions for Safe Handling

Practice good housekeeping. Use adequate exhaust ventilation, dust collection and/or water mist to maintain airborne dust concentrations below permissible exposure limits (note: respirable crystalline silica dust may be in the air without a visible dust cloud).

Do not permit dust to collect on walls, floors, sills, ledges, machinery, or equipment. Maintain and test ventilation and dust collection equipment. In cases of insufficient ventilation, wear a NIOSH approved respirator for silica dust when handling or disposing dust from this product. Avoid contact with skin and eyes. Wash or vacuum clothing that has become dusty. Avoid eating, smoking, or drinking while handling the material.

7.2 Conditions for Safe Storage, Including any Incompatibilities

Minimize dust produced during loading and unloading.

Section 8
Exposure Controls/Personal Protection

8.1 Control Parameters

OCCUPATIONAL EXPOSURE LIMITS					
SUBSTANCE		OSHA PEL TWA (mg/m ³)	NIOSH REL TWA (mg/m ³)	ACGIH TLV TWA (mg/m ³)	CA - OSHA PEL (mg/m ³)
Calcium oxide		5	2	2	2
Particulates Not Otherwise Regulated	Total	15	15	10	10
	Respirable	5	5	3	5
Respirable Crystalline Silica	Respirable	0.05	0.05	0.025	0.05
Manganese dioxide (as manganese compounds)	Total	5 (Ceiling)	1 3 (STEL)	0.1	0.2
	Respirable	-	-	0.02	-

8.2 Exposure Controls

8.2.1 Engineering Controls

Provide ventilation to maintain the ambient workplace atmosphere below the occupational exposure limit(s). Use general and local exhaust ventilation and dust collection systems as necessary to minimize exposure.

8.2.2 Personal Protective Equipment (PPE)

Respiratory protection:	Wear a NIOSH approved particulate respirator if exposure to airborne particulates is unavoidable and where occupational exposure limits may be exceeded. If airborne exposures are anticipated to exceed applicable PELs or TLVs, a self-contained breathing apparatus or airline respirator is recommended.
Eye and face protection:	If eye contact is possible, wear protective glasses with side shields. Avoid contact lenses.
Hand and skin protection:	Wear gloves and protective clothing. Wash hands with soap and water after contact with material.

Section 9
Physical and Chemical Properties

9.1 Information on Basic Physical and Chemical Properties

Property: Value	Property: Value
Appearance (physical state, color, etc.): Fine tan/gray particulate	Upper/lower flammability or explosive limits: Not applicable
Odor: Odorless ¹	Vapor Pressure (Pa): Not applicable
Odor threshold: Not applicable	Vapor Density: Not applicable
pH (25 °C) (in water): 8 - 11	Specific gravity or relative density: 2.2 – 2.9
Melting point/freezing point (°C): Not applicable	Water Solubility: Slight
Initial boiling point and boiling range (°C): Not applicable	Partition coefficient: n-octane/water: Not determined
Flash point (°C): Not determined	Auto ignition temperature (°C): Not applicable
Evaporation rate: Not applicable	Decomposition temperature (°C): Not determined
Flammability (solid, gas): Not combustible	Viscosity: Not applicable

¹The use of urea or aqueous ammonia injected into the flue gas to reduce nitrogen oxides (NOx) emissions may result in the presence of ammonium sulfate or ammonium bisulfate in the ash at less than 0.1%. When ash containing these substances becomes wet under high pH (>9), free ammonia gas may be released resulting in objectionable/nuisance ammonia odor and potential exposure to ammonia gas especially in confined spaces.

Section 10
Stability and Reactivity

10.1 Reactivity:	The material is an inert, inorganic material primarily composed of elemental oxides.
10.2 Chemical stability:	The material is stable under normal use conditions.
10.3 Possibility of hazardous reactions:	The material is a relatively stable, inert material; however, when ash containing ammonia becomes wet under high pH (>9), free ammonia gas may be released resulting in an objectionable/nuisance ammonia odor and potential exposure to ammonia gas especially in confined spaces. Polymerization will not occur.
10.4 Conditions to avoid:	Product can become airborne in moderate winds. Dry material should be stored in silos. Materials stored out of doors should be covered or maintained in a damp condition.
10.5 Incompatible materials:	None known.
10.6 Hazardous decomposition products:	None known.

Section 11
Toxicological Information

11.1 Information on Toxicological Effects

Endpoint	Data
Acute oral toxicity	LD50 > 2000 mg/kg
Acute dermal toxicity	LD50 > 2000 mg/kg
Acute inhalation toxicity	LD50 > 5.0 mg/L
Skin corrosion/irritation	Does not meet the classification criteria but may cause slight skin irritation. Product dust can dry the skin which can result in irritation.
Eye damage/irritation	Causes serious eye irritation. Positive scores for conjunctiva irritation and chemosis in 2/3 animals based on average of 24, 48 and 72-hour scores with irritation clearing within 21 days; no corneal or iritis effects observed.
Respiratory/skin sensitization	Not a respiratory or dermal sensitizer.
Germ cell mutagenicity	Not mutagenic in in-vitro and in-vivo assays with or without metabolic activation.
Carcinogenicity	Not available. Respirable crystalline silica has been identified as a carcinogen by OSHA, NTP, ACGIH and IARC.
Reproductive toxicity	No developmental toxicity was observed in available animal studies. Reproductive studies on CCPs showed either no reproductive effects, or some effects on male and female reproductive organs and parameters but without a clear dose response. Inorganic bromide salts have been shown to have adverse effects on reproductive parameters in some animal studies.
STOT-SE	CCPs when present as a nuisance dust may result in respiratory irritation.
STOT-RE	In a 180-day inhalation study with fly ash dust, no effects were observed at the highest dose tested. NOEC = 4.2 mg/m ³ ; it is not possible to assess the level at which toxicologically significant effects may occur. Repeated inhalation exposures to high levels of respirable crystalline silica may result in lung damage (i.e., silicosis).
Aspiration Hazard	Not applicable based product form.

Section 12
Ecological Information

12.1 Toxicity

Fly Ash (CAS# 68131-74-8)	
Toxicity to Fish	LC50 > 100 mg/L
Toxicity to Aquatic Invertebrates	Data indicates that the test substance is not toxic to <i>Daphnia magna</i> (EC50 undetermined)
Toxicity to Aquatic Algae and Plants	EC50 = 10 mg/L
Calcium oxide CAS# 1305-78-8	
Toxicity to Fish	LC50 = 50.6 mg/L The findings were closely related to the pH of the test solutions; therefore, pH is considered to be the main reason for the effects.
Toxicity to Aquatic Invertebrates	EC50 = 49.1 mg/L The findings were closely related to the pH of the test solutions; therefore, pH is considered to be the main reason for the effects.
Toxicity to Aquatic Algae and Plants	NOEC = 48 mg/L @ 72 hours based on Ca(OH) ₂ The initial pH of the test medium was not directly related to the biologically relevant effects. The formation of precipitates is likely the result of the reaction between CO ₂ dissolved in the medium.

12.2 Persistence and Degradability

Not relevant for inorganic materials.

12.3 Bioaccumulative Potential

This material does not contain any compounds that would bioaccumulate up the food chain.

12.4 Mobility in Soil

No data available.

12.5 Results of PBT and vPvB Assessment

This material does not contain any compounds classified as “persistent, bioaccumulative or toxic” nor as “very persistent/very bioaccumulative”.

12.6 Other Adverse Effects

None known.

Section 13
Disposal Considerations

See Sections 7 and 8 above for safe handling and use, including appropriate industrial hygiene practices.
 Dispose of all waste product and containers in accordance with federal, state and local regulations.

Section 14
Transport Information

Regulatory entity: U.S. DOT	Shipping Name:	Not Regulated
	Hazard Class:	Not Regulated
	ID Number:	Not Regulated
	Packing Group:	Not Regulated

Section 15
Regulatory Information

15.1 Safety, Health and Environmental Regulations/Legislation Specific for the Mixture

- o TSCA Inventory Status

All components are listed on the TSCA Inventory.

- o California Proposition 65

The following substances are known to the State of California to be carcinogens and/or reproductive toxicants:

- Respirable crystalline silica
- Titanium dioxide

- o State Right-to-Know (RTK)

Component	CAS	MA^{1,2}	NJ^{3,4}	PA⁵	RI⁶
Ammonium bisulfate	7803-63-6	No	Yes	No	No
Ammonium sulfate	7783-20-2	Yes	No	Yes	No
Calcium oxide	1305-78-8	Yes	Yes	Yes	No
Iron oxide	1309-37-1	Yes	Yes	Yes	No
Magnesium oxide	1309-48-4	No	Yes	No	No
Phosphorus pentoxide (or phosphorus oxide)	1314-56-3	Yes	Yes	Yes	No
Potassium oxide	12136-45-7	No	Yes	No	No
Silica-crystalline (SiO ₂), quartz	14808-60-7	Yes	Yes	Yes	No
Sodium oxide	1313-59-3	No	Yes	No	No
Titanium dioxide	13463-67-7	Yes	Yes	Yes	Yes

¹ Massachusetts Department of Public Health, no date

² 189th General Court of The Commonwealth of Massachusetts, no date

³ New Jersey Department of Health and Senior Services, 2010a

⁴ New Jersey Department of Health, 2010b

⁵ Pennsylvania Code, 1986

⁶ Rhode Island Department of Labor and Training, no date

Section 16**Other Information, Including Date of Preparation or Last Revision****16.1 Indication of Changes**

Date of preparation or last revision: February 23, 2018

16.2 Abbreviations and Acronyms

- ACGIH: American Conference of Industrial Hygienists
- CA: California
- CAS: Chemical Abstract Services
- CCP: Coal Combustion Product
- CFR: Code of Federal Regulations
- EPA: Environmental Protection Agency
- GHS: Globally Harmonized System of Classification and Labelling
- IARC: International Agency for Research on Cancer
- LC50: Concentration resulting in the mortality of 50 % of an animal population
- LD50: Dose resulting in the mortality of 50 % of an animal population
- MA: Massachusetts
- NA: Not Applicable
- NJ: New Jersey
- NOEC: No observed effect concentration
- NIOSH: National Institute of Occupational Safety and Health
- NOx: Nitrogen oxides
- NTP: US National Toxicology Program
- OEL: Occupational Exposure Limit
- OSHA: Occupational Safety and Health Administration
- PA: Pennsylvania
- PBT: Persistent, Toxic and Bioaccumulative
- PEL: Permissible exposure limit
- PPE: Personal Protective Equipment
- REL: Recommended exposure limit
- RI: Rhode Island
- RCS: Respirable Crystalline Silica
- RTK: Right-to-Know
- SCBA: Self-contained breathing apparatus
- SDS: Safety Data Sheet
- STEL: Short-term exposure limit
- STOT-RE: Specific target organ toxicity-repeated exposure
- STOT-SE: Specific target organ toxicity-single exposure
- TLV: Threshold limit value
- TSCA: Toxic Substances Control Act
- TWA: Time-weighted average
- UEL: Upper explosive limit
- UVCB: Unknown or Variable Composition/Biological
- U.S.: United States
- U.S. DOT: United States of Department of Transportation

16.3 Other Hazards

Hazardous Materials Identification System (HMIS)						
Degree of hazard (0= low, 4 = extreme)						
Health:	2*	Flammability:	0	Physical Hazards:	0	Personal protection:**

* Chronic Health Effects

** Appropriate personal protection is defined by the activity to be performed.
 See Section 8 for additional information.

DISCLAIMER:

This SDS has been prepared in accordance with the Hazard Communication Rule 29 CFR 1910.1200. Information herein is based on data considered to be accurate as of date prepared. No warranty or representation, express or implied, is made as to the accuracy or completeness of this data and safety information. No responsibility can be assumed for any damage or injury resulting from abnormal use, failure to adhere to recommended practices, or from any hazards inherent in the nature of the product.

Safety Data Sheet

Section 1
Identification of the Substance and of the Supplier

1.1 Product Identifier

Product Name/Identification:	ASTM Class C Fly Ash
Synonyms:	Coal Fly Ash, Pozzolan
Formula:	UVCB Substance

1.2 Relevant Identified Uses of the Substance or Mixture and Uses Advices Against

Relevant Identified Uses:	Component of wallboard, concrete, roofing material, bricks, cement kiln feed.
Uses Advised Against:	None known.

1.3 Details of the Supplier of the SDS

Manufacturer/Supplier:	Dynergy, Inc.
Street Address:	601 Travis Street, Suite 1400
City, State and Zip Code:	Houston, TX 77002
Customer Service Telephone:	800-633-4704


Section 2 Hazards Identification

2.1 Classification of the Substance

GHS Classification(s) according to OSHA Hazard Communication Standard (29 CFR 1910.1200):

- Eye Irritant, Category 2A
- STOT-SE, Category 3 (Respiratory Irritation)
- Carcinogen, Category 1A
- STOT-RE, Category 1 (Lungs)
- Toxic to Reproduction, Category 2

2.2 Label Elements

Labelling according to 29 CFR 1910.1200 Appendices A, B and C*	
Hazard Pictogram(s):	
Signal word:	DANGER
Hazard Statement(s):	<p><i>Causes serious eye irritation.</i></p> <p><i>May cause damage to lungs after repeated/prolonged exposure via inhalation.</i></p> <p><i>May cause respiratory irritation.</i></p> <p><i>May cause cancer of the lung.</i></p> <p><i>Suspected of damaging fertility or the unborn child.</i></p>
Precautionary Statement(s):	<p><i>Obtain special instructions before use.</i></p> <p><i>Do not handle until all safety precautions have been read and understood.</i></p> <p><i>Avoid breathing dust.</i></p> <p><i>Wear protective gloves/protective clothing/eye protection/face protection.</i></p> <p><i>Wash thoroughly after handling.</i></p> <p><i>Do not eat drink or smoke when using this product.</i></p> <p><i>Use outdoors or in a well-ventilated area.</i></p> <p><i>If exposed or concerned: Get medical advice/attention.</i></p> <p><i>Store in a secure area.</i></p> <p><i>Dispose of product in accordance with local/national regulations.</i></p>

* Fly ash and other coal combustion products (CCPs) are UVCB substances (unknown or variable composition or biological). Various CCPs, noted as ashes/ash residuals; Ashes, residues, bottom; Bottom ash; Bottom ash residues; Waste solids, ashes under TSCA are defined as: "The residuum from the burning of a combination of carbonaceous materials. The following elements may be present as oxides: aluminum, calcium, iron, magnesium, nickel, phosphorus, potassium, silicon, sulfur, titanium, and vanadium." Ashes including fly ash and fluidized bed combustion ash are identified by CAS number 68131-74-8. The exact composition of the ash is dependent on the fuel source and flue additives composed of many constituents. The

classification of the final substance is dependent on the presence of specific identified oxides as well as other trace elements.

2.3 Other Hazards

Listed Carcinogens:

-Respirable Crystalline Silica

IARC: [Yes] **NTP:** [Yes] **OSHA:** [Yes] **Other: (ACGIH)** [Yes]

Section 3
Composition/Information on Ingredients

Substance	CAS No.	Percentage (%)	GHS Classification
Crystalline Silica	14808-60-7	30 - 60%	Repeat Dose STOT, Category 1 Carcinogen, Category 1A
Silica, crystalline respirable (RCS)	14808-60-7	See Footnote 1	Repeat Dose STOT, Category 1 Carcinogen, Category 1A
Aluminosilicates	71243-67-9 1327-36-2	30 - 60%	Single Exposure STOT, Category 3
Iron oxide	1309-37-1	1 - 10%	Not Classified
Calcium oxide (CaO)	1305-78-8	20 - 30%	Skin Irritant, Category 2 Eye Irritant, Category 1 Single Exposure STOT, Category 3
Magnesium oxide	1309-48-4	2 - 10%	Not Classified
Phosphorus pentoxide (P ₂ O ₅)	1314-56-3	≤2%	Skin Irritant, Category 2 Eye Irritant, Category 2B
Sodium oxide	1313-59-3	1-8%	Not Classified
Potassium oxide (K ₂ O)	12136-45-7	≤1%	Skin Irritant, Category 2 Eye Irritant, Category 2B
Titanium dioxide (TiO ₂)	13463-67-7	<3%	Not Classified
Bromide salt (calcium)	7789-41-5	See Footnote 2	Toxic to Reproduction, Category 2

Footnote 1: The percentage of respirable crystalline silica has not been determined. Therefore, a GHS classification of Carcinogen, Category 1A has been assigned.

Footnote 2: Analytical data are not available to demonstrate that the concentration of bromide salt is <0.1%; therefore, a GHS classification of Toxic to Reproduction, Category 2 has been assigned.

Section 4
First Aid Measures

4.1 Description of First Aid Measures

Inhalation:	If product is inhaled and irritation of the nose or coughing occurs, remove person to fresh air. Get medical advice/attention if respiratory symptoms persist.
Skin Contact:	If skin exposure occurs, wash with soap and water.
Eye Contact:	If product gets into the eye, rinse copiously with water for several minutes. Remove contact lenses, if present and easy to do. Seek medical attention/advice if irritation occurs or persists.
Ingestion:	No specific first aid measures are required.

4.2 Most Important Health Effects, Both Acute and Delayed

Acute Effects: Direct exposure may cause respiratory irritation, eye irritation and skin irritation. The product dust can dry and irritate the skin and cause dermatitis and can irritate eyes and skin through mechanical abrasion.

Chronic Effects: Chronic exposure may cause lung damage from repeated exposure. Prolonged inhalation of respirable crystalline silica above certain concentrations may cause lung diseases, including silicosis and lung cancer. Repeated exposure to dusts containing inorganic bromide salts may affect fertility and/or result in effects to the unborn child.

4.3 Indication of Any Immediate Medical Attention and Special Treatment Needed

Seek first aid or call a doctor or Poison Control Center if contact with eyes occurs and irritation remains after rinsing. Get medical advice if inhalation occurs and respiratory symptoms persist.

Section 5
Firefighting Measures

5.1 Extinguishing Media

Suitable Extinguishing Media:	Product is not flammable. Use extinguishing media appropriate for surrounding fire.
Unsuitable Extinguishing Media:	Not applicable, the product is not flammable.

5.2 Special Hazards Arising from the Substance or Mixture

Hazardous Combustion Products:	None known.
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5.3 Advice for Firefighters

Special Protective Equipment and Precautions for Firefighters:	As with any fire, wear self-contained breathing apparatus (NIOSH approved or equivalent) and full protective gear.
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Section 6
Accidental Release Measures

6.1 Personal Precautions, Protective Equipment and Emergency Procedures

Personal precautions/Protective Equipment:	See Section 8.2.2 Individual Protective Measures. For concentrations exceeding Occupational Exposure Levels (OELs), use a self-contained breathing apparatus (SCBA).
Emergency procedures:	Use scooping, water spraying/flushing/misting or ventilated vacuum cleaning systems to clean up spills. Do not use pressurized air.

6.2 Environmental Precautions

Environmental precautions:	Prevent contamination of drains or waterways and dispose according to local and national regulations.
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6.3 Methods and Material for Containment and Cleaning Up

Methods and materials for containment and cleaning up:	<p>Do not use brooms or compressed air to clean surfaces. Use dust collection vacuum and extraction systems.</p> <p>Large spills of dry product should be removed by a vacuum system. Dampened material should be removed by mechanical means and recycled or disposed of according to local and national regulations.</p>
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See Sections 8 and 13 for additional information on exposure controls and disposal.

Section 7
Handling and Storage

7.1 Precautions for Safe Handling

Practice good housekeeping. Use adequate exhaust ventilation, dust collection and/or water mist to maintain airborne dust concentrations below permissible exposure limits (note: respirable crystalline silica dust may be in the air without a visible dust cloud).

Do not permit dust to collect on walls, floors, sills, ledges, machinery, or equipment. Maintain and test ventilation and dust collection equipment. In cases of insufficient ventilation, wear a NIOSH approved respirator for silica dust when handling or disposing dust from this product. Avoid contact with skin and eyes. Wash or vacuum clothing that has become dusty. Avoid eating, smoking, or drinking while handling the material.

7.2 Conditions for Safe Storage, Including any Incompatibilities

Minimize dust produced during loading and unloading.

Section 8
Exposure Controls/Personal Protection

8.1 Control Parameters

OCCUPATIONAL EXPOSURE LIMITS					
SUBSTANCE		OSHA PEL TWA (mg/m ³)	NIOSH REL TWA (mg/m ³)	ACGIH TLV TWA (mg/m ³)	CA - OSHA PEL (mg/m ³)
Calcium oxide		5	2	2	2
Particulates Not Otherwise Regulated	Total	15	15	10	10
	Respirable	5	5	3	5
Respirable Crystalline Silica	Respirable Crystalline Silica	0.05	0.05	0.025	0.05
Titanium dioxide	Total	15	2.4 (fine) 0.3 (ultrafine)	10	10
Manganese dioxide (as manganese compounds)	Total	5 (Ceiling)	1 3 (STEL)	0.1	0.2
	Respirable	-	-	0.02	-

8.2 Exposure Controls

8.2.1 Engineering Controls

Provide ventilation to maintain the ambient workplace atmosphere below the occupational exposure limit(s). Use general and local exhaust ventilation and dust collection systems as necessary to minimize exposure.

8.2.2 Personal Protective Equipment (PPE)

Respiratory protection:	Wear a NIOSH approved particulate respirator if exposure to airborne particulates is unavoidable and where occupational exposure limits may be exceeded. If airborne exposures are anticipated to exceed applicable PELs or TLVs, a self-contained breathing apparatus or airline respirator is recommended.
Eye and face protection:	If eye contact is possible, wear protective glasses with side shields. Avoid contact lenses.
Hand and skin protection:	Wear gloves and protective clothing. Wash hands with soap and water after contact with material.

Section 9
Physical and Chemical Properties

9.1 Information on Basic Physical and Chemical Properties

Property: Value	Property: Value
Appearance (physical state, color, etc.): Fine tan/gray particulate	Upper/lower flammability or explosive limits: Not applicable
Odor: Odorless ¹	Vapor Pressure (Pa): Not applicable
Odor threshold: Not applicable	Vapor Density: Not applicable
pH (25 °C) (in water): Not Determined	Specific gravity or relative density: 2.2 – 2.9
Melting point/freezing point (°C): Not applicable	Water Solubility: Slight
Initial boiling point/boiling range (°C): NA	Partition coefficient: n-octane/water: NA
Flash point (°C): Not determined	Auto ignition temperature (°C): Not applicable
Evaporation rate: Not applicable	Decomposition temperature (°C): Not determined
Flammability (solid, gas): Not combustible	Viscosity: Not applicable

¹The use of urea or aqueous ammonia injected into the flue gas to reduce nitrogen oxides (NOx) emissions may result in the presence of ammonium sulfate or ammonium bisulfate in the ash at less than 0.1%. When ash containing these substances becomes wet under high pH (>9), free ammonia gas may be released resulting in objectionable/nuisance ammonia odor and potential exposure to ammonia gas especially in confined spaces.

Section 10
Stability and Reactivity

10.1 Reactivity:	The material is an inert, inorganic material primarily composed of elemental oxides.
10.2 Chemical stability:	The material is stable under normal use conditions.
10.3 Possibility of hazardous reactions:	The material is a relatively stable, inert material; however, when ash containing ammonia becomes wet under high pH (>9), free ammonia gas may be released resulting in an objectionable/nuisance ammonia odor and potential exposure to ammonia gas especially in confined spaces. Polymerization will not occur.
10.4 Conditions to avoid:	Product can become airborne in moderate winds. Dry material should be stored in silos. Materials stored out of doors should be covered or maintained in a damp condition.
10.5 Incompatible materials:	None known.
10. 6 Hazardous decomposition products:	None known.

Section 11
Toxicological Information

11.1 Information on Toxicological Effects

Endpoint	Data
Acute oral toxicity	LD50 > 2000 mg/kg
Acute dermal toxicity	LD50 > 2000 mg/kg
Acute inhalation toxicity	LD50 > 5.0 mg/L
Skin corrosion/irritation	Does not meet the classification criteria but may cause slight skin irritation. Product dust can dry the skin which can result in irritation.
Eye damage/irritation	Causes serious eye irritation. Positive scores for conjunctiva irritation and chemosis in 2/3 animals based on average of 24, 48 and 72-hour scores with irritation clearing within 21 days; No corneal or iritis effects observed.
Respiratory/skin sensitization	Not a respiratory or dermal sensitizer.
Germ cell mutagenicity	Not mutagenic in in-vitro and in-vivo assays with or without metabolic activation.
Carcinogenicity	Not available. Respirable crystalline silica has been identified as a carcinogen by OSHA, NTP, ACGIH and IARC.
Reproductive toxicity	<p>No developmental toxicity was observed in available animal studies. Reproductive studies on CCPs showed either no reproductive effects, or some effects on male and female reproductive organs and parameters but without a clear dose response.</p> <p>Inorganic bromide salts have been shown to have adverse effects on reproductive parameters in some animal studies.</p>
STOT-SE	CCPs when present as a nuisance dust may result in respiratory irritation.
STOT-RE	<p>In a 180-day inhalation study with fly ash dust, no effects were observed at the highest dose tested. NOEC = 4.2 mg/m³; it is not possible to assess the level at which toxicologically significant effects may occur.</p> <p>Repeated inhalation exposures to high levels of respirable crystalline silica may result in lung damage (i.e., silicosis).</p>
Aspiration Hazard	Not applicable based product form.

Section 12
Ecological Information

12.1 Toxicity

Fly Ash C (CAS# 68131-74-8)	
Toxicity to Fish	LC50 > 100 mg/L
Toxicity to Aquatic Invertebrates	Data indicates that the test substance is not toxic to <i>Daphnia magna</i> (EC50 undetermined).
Toxicity to Aquatic Algae and Plants	EC50 = 10 mg/L

Calcium oxide CAS# 1305-78-8	
Toxicity to Fish	LC50 = 50.6 mg/L The findings were closely related to the pH of the test solutions; therefore, pH is considered to be the main reason for the effects.
Toxicity to Aquatic Invertebrates	EC50 = 49.1 mg/L The findings were closely related to the pH of the test solutions; therefore, pH is considered to be the main reason for the effects.
Toxicity to Aquatic Algae and Plants	NOEC = 48 mg/L @ 72 hours based on Ca(OH) ₂ The initial pH of the test medium was not directly related to the biologically relevant effects. The formation of precipitates is likely the result of the reaction between CO ₂ dissolved in the medium.

12.2 Persistence and Degradability

Not relevant for inorganic materials.

12.3 Bioaccumulative Potential

This material does not contain any compounds that would bioaccumulate up the food chain.

12.4 Mobility in Soil

No data available.

12.5 Results of PBT and vPvB Assessment

This material does not contain any compounds classified as “persistent, bioaccumulative or toxic” nor as “very persistent/very bioaccumulative”.

12.6 Other Adverse Effects

None known.

Section 13

Disposal Considerations

See Sections 7 and 8 above for safe handling and use, including appropriate industrial hygiene practices.
 Dispose of all waste product and containers in accordance with federal, state and local regulations.

**Section 14
 Transport Information**

Regulatory entity: U.S. DOT	Shipping Name:	Not Regulated
	Hazard Class:	Not Regulated
	ID Number:	Not Regulated
	Packing Group:	Not Regulated

Section 15
Regulatory Information

15.1 Safety, Health and Environmental Regulations/Legislation Specific for the Mixture

- o TSCA Inventory Status

All components are listed on the TSCA Inventory.

- o California Proposition 65.

The following substances are known to the State of California to be carcinogens and/or reproductive toxicants:

- Respirable crystalline silica

- o State Right-to-Know (RTK)

Component	CAS	MA ^{1,2}	NJ ^{3,4}	PA ⁵	RI ⁶
Ammonium bisulfate	7803-63-6	No	Yes	No	No
Ammonium sulfate	7783-20-2	Yes	No	Yes	No
Calcium oxide	1305-78-8	Yes	Yes	Yes	No
Iron oxide	1309-37-1	Yes	Yes	Yes	No
Magnesium oxide	1309-48-4	No	Yes	No	No
Manganese oxide-as manganese compounds	1313-13-9; Various	No	No	Yes	Yes
Phosphorus pentoxide (or phosphorus oxide)	1314-56-3	Yes	Yes	Yes	No
Potassium oxide	12136-45-7	No	Yes	No	No
Silica-crystalline (SiO ₂), quartz	14808-60-7	Yes	Yes	Yes	No
Sodium oxide	1313-59-3	No	Yes	No	No
Titanium dioxide	13463-67-7	Yes	Yes	Yes	Yes

¹ Massachusetts Department of Public Health, no date

² 189th General Court of The Commonwealth of Massachusetts, no date

³ New Jersey Department of Health and Senior Services, 2010a

⁴ New Jersey Department of Health, 2010b

⁵ Pennsylvania Code, 1986

⁶ Rhode Island Department of Labor and Training, no date

Section 16
Other Information, Including Date of Preparation or Last Revision

16.1 Indication of Changes

Date of preparation or last revision: February 23, 2018

16.2 Abbreviations and Acronyms

- ACGIH: American Conference of Industrial Hygienists
- CA: California
- CAS: Chemical Abstract Services
- CCP: Coal Combustion Product
- CFR: Code of Federal Regulations
- EPA: Environmental Protection Agency

- GHS: Globally Harmonized System of Classification and Labelling
- IARC: International Agency for Research on Cancer
- LC50: Concentration resulting in the mortality of 50 % of an animal population
- LD50: Dose resulting in the mortality of 50 % of an animal population
- MA: Massachusetts
- NA: Not Applicable
- NJ: New Jersey
- NOEC: No observed effect concentration
- NIOSH: National Institute of Occupational Safety and Health
- NOx: Nitrogen oxides
- NTP: US National Toxicology Program
- OEL: Occupational Exposure Limit
- OSHA: Occupational Safety and Health Administration
- PA: Pennsylvania
- PBT: Persistent, Toxic and Bioaccumulative
- PEL: Permissible exposure limit
- PPE: Personal Protective Equipment
- REL: Recommended exposure limit
- RI: Rhode Island
- RCS: Respirable Crystalline Silica
- RTK: Right-to-Know
- SCBA: Self-contained breathing apparatus
- SDS: Safety Data Sheet
- STEL: Short-term exposure limit
- STOT-RE: Specific target organ toxicity-repeated exposure
- STOT-SE: Specific target organ toxicity-single exposure
- TLV: Threshold limit value
- TSCA: Toxic Substances Control Act
- TWA: Time-weighted average
- UEL: Upper explosive limit
- UVCB: Unknown or Variable Composition/Biological
- U.S.: United States
- U.S. DOT: United States of Department of Transportation

16.3 Other Hazards

Hazardous Materials Identification System (HMIS)						
Degree of hazard (0= low, 4 = extreme)						
Health:	2*	Flammability:	0	Physical Hazards:	0	Personal protection:**

* Chronic Health Effects

** Appropriate personal protection is defined by the activity to be performed.

See Section 8 for additional information.

DISCLAIMER:

This SDS has been prepared in accordance with the Hazard Communication Rule 29 CFR 1910.1200. Information herein is based on data considered to be accurate as of date prepared. No warranty or representation, express or implied, is made as to the accuracy or completeness of this data and safety information. No responsibility can be assumed for any damage or injury resulting from abnormal use, failure to adhere to recommended practices, or from any hazards inherent in the nature of the product.

ATTACHMENT T



Phil Morris
Dynergy Midwest Generation, LLC
Luminant
1500 Eastport Plaza Drive
Collinsville, IL 62234

May 19, 2021

Mr. Darin LeCrone, P.E.
Manager, Industrial Unit
Bureau of Water, Division of Water Pollution Control, Permits Section
Illinois Environmental Protection Agency
1021 North Grand Avenue, East
Springfield, IL 62794-9276

Re: CCR Surface Impoundment Category Designation and Justification for Dynergy Midwest Generation, LLC

Dear Mr. LeCrone:

Pursuant to 35 I.A.C. 845.700(c), Dynergy Midwest Generation, LLC submits the information necessary to categorize the CCR surface impoundments located at the Baldwin Power Plant and the retired Hennepin and Vermilion Power Plants. The following parameters were used in assessing and justifying each assigned category.

- **Category 1 – *Impacts to existing potable water supply well or impacts to groundwater quality within the setback of an existing potable water supply well.***
 - This review includes an assessment of potable water wells within 2,500 feet of CCR surface impoundments to determine whether any potential impacts are occurring within the setback zone of any community water supply well established under the Illinois Groundwater Protection Act.
 - This information was developed during the Part 845 rulemaking and is summarized in Attachment 1, Table 2: Impacts to Potable Water Supply.
- **Category 2 – *Imminent threat to human health or the environment or have been designated by IEPA under (g)(5)***
 - The surface impoundments at Baldwin, Hennepin and Vermilion Power Plants do not pose an imminent threat to human health or the environment. There are no known conditions at or around the facility where someone or something may be exposed to contaminant concentrations reasonably expected to cause harm
- **Category 3 – *Located in areas of environmental justice (“EJ”) concern***
 - EJ areas were evaluated using the EJ mapping link from IEPA’s webpage located at <https://www2.illinois.gov/epa/topics/environmental-justice>. Per the IEPA mapping tool, the EJ Status thresholds were determined as twice the state averages for Minority and Low Income consistent with 35 IAC 845.700(g)(6).
 - An EJ map denoting the facilities with impoundments is located in Attachment 3.

- **Category 4-7**
 - Category 4 - Inactive CCR surface impoundments that have an exceedance of the groundwater protection standards in Section 845.600
 - Category 5 - Existing CCR surface impoundments that have exceedances of the groundwater protection standards in Section 845.600
 - Category 6 - Inactive CCR surface impoundments that are in compliance with the groundwater protection standards in Section 845.600.
 - Category 7 – Existing CCR surface impoundments that are in compliance with the groundwater protection standards in Section 845.600

Based on the information above, category designations have been assigned. The category designations for each CCR impoundment are shown in Attachment 1, Table 1: Category Designations.

If you have any questions regarding this submittal, please contact Phil Morris at 618-343-7794 or phil.morris@vistracorp.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Phil Morris', is written over a light blue horizontal line.

Phil Morris
Senior Environmental Director

Attachments

Attachment 1

Table 1: Category Designation

Facility	Pond Description	Classifications	Potable Water Supply Impacts (Category 1)	Human Health or Environment Threat (Category 2)	Located within Environmental Justice Areas ¹ (Category 3)	Standards Exceedances ² (Categories 4,5,6,7)	Impoundment Category 845.700(g)
Baldwin	Bottom Ash Pond	Existing	No	No	No	No	7
Hennepin	East New Primary Pond	Inactive	No	No	Yes	NA ³	3
Vermilion	North Pond Cell 1 & 2	Inactive	No	No	No	Yes	4
	Old East Pond	Inactive	No	No	No	Yes	4
	New East Pond Cell 1 & 2	Inactive	No	No	No	Yes	4

¹See Attachment 3 Environmental Justice Area Map

²Ground water analyses for purposes of categories 4-7, assumptions have been made based on current groundwater data. However, since sampling and analysis is ongoing and subject to IEPA review and approval, IPGC reserves the right to update its category designations for Categories 4-7.

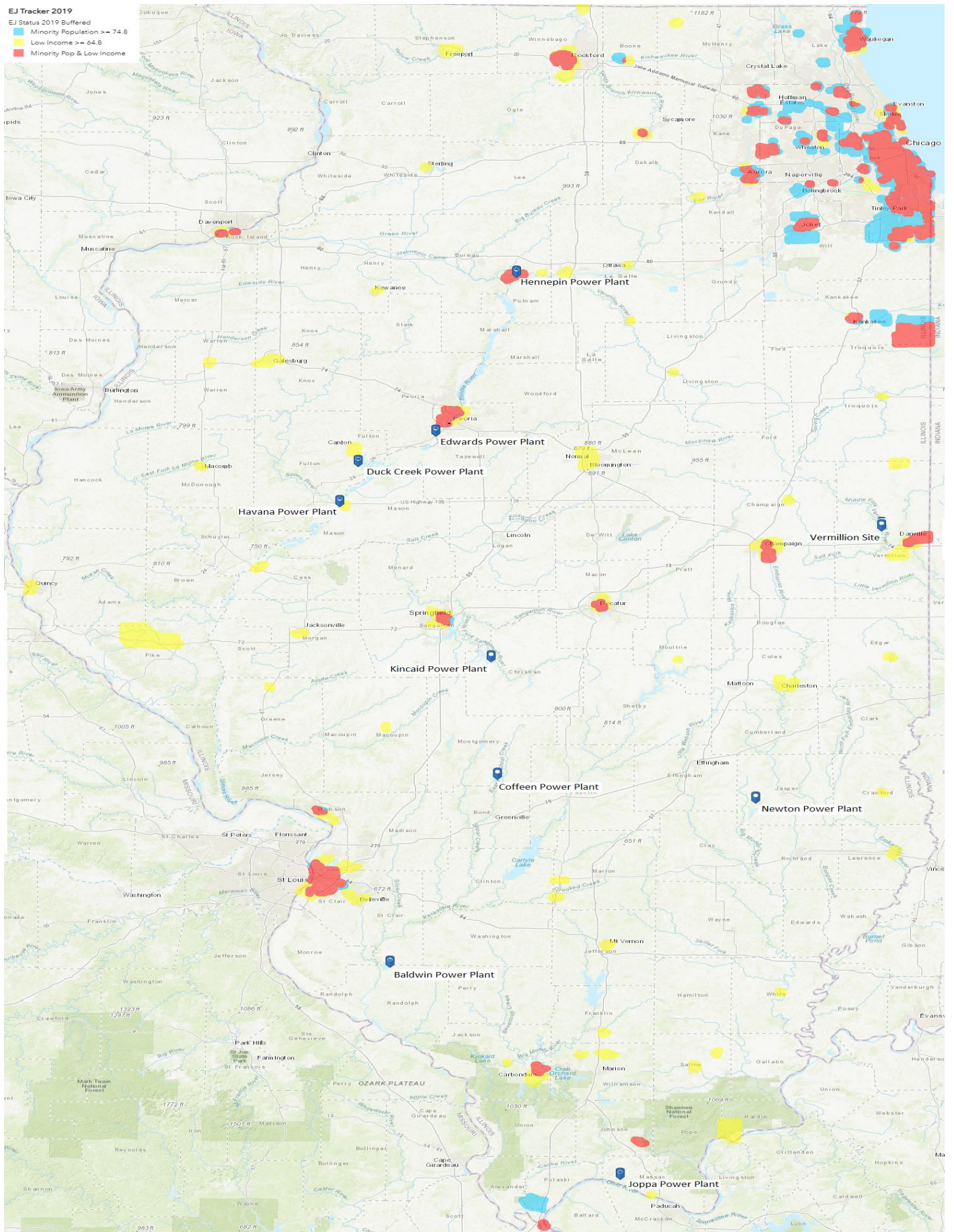
³NA for this determination since the CCR surface impoundment was assign a highest priority category

Table 2: Impacts to Potable Water Supply

Site Name	Private and Semi-Private Wells	Non-Community Water Supply (CWS) Wells	Non-CWS Surface Water Intakes	Community Water Supply Wells	CWS Surface Water Intakes
Baldwin	Present, but not at risk Twenty-two (22) water wells were identified and eight (8) are located potentially downgradient of the site. Based on Ramboll's review of groundwater data, these wells are unlikely to be impacted by releases from the site.	Absent	Absent	Present, but not at risk Two (2) active CWS wells were identified; however, they are unlikely to be at risk because of their hydrogeologic location relative to the power plant.	Present, but not at risk One (1) CWS surface water intake was identified potentially downgradient of the site. Based on Ramboll's review of available information, this CWS surface water intake is unlikely to be impacted by releases from the site.
Hennepin	Present, but not at risk Sixteen (16) water wells were identified and one (1) is located potentially downgradient of the site. However, this well is unlikely to be present/in use based on its remote floodplain location and installation date (1884).	Present, but not at risk Three (3) non-CWS wells were identified; however, they are unlikely to be at risk because of their relative hydrogeologic position or inactive status.	Absent	Absent	Absent
Vermilion	Present, but not at risk Seventy-nine (79) water wells were identified; however, they are unlikely to be at risk because of their hydrogeologic location relative to the power plant, they are abandoned, they do not appear to be used for potable purposes, and/or they are unlikely to be present based on the mapped location. None of the off-site wells are located in a downgradient direction.	Present, but not at risk Two CWS wells were identified; however, they are unlikely to be at risk because of their hydrogeologic location relative to the power plant and/or their inactive status.	Present, but inactive One non-CWS surface water intake was identified; however, it is unlikely to be at risk because it is listed with inactive status.	Absent	Absent

Attachment 3: EJ Mapping Denoting Facilities with Impoundments

EJ Tracker 2019
EJ Status 2019 Buffered
Minority Population >= 74.8
Low Income >= 64.8
Minority Pop & Low Income



ATTACHMENT U

October 11, 2021

Dynegy Midwest Generation, LLC
13498 E. 800th Street
Hennepin, Illinois 61327

**Subject: USEPA CCR Rule and IEPA Part 845 Rule Applicability Cross-Reference
2021 USEPA CCR Rule Periodic Certification Report
East Ash Pond, Hennepin Power Plant, Hennepin, Illinois**

At the request of Dynegy Midwest Generation, LLC Geosyntec Consultants (Geosyntec) has prepared this letter to document how the attached 2021 United States Environmental Protection Agency (USEPA) CCR Rule Periodic Certification Report (Report) was prepared in accordance with both the Federal USEPA CCR Rule¹ and the state-specific Illinois Environmental Protection Agency (IEPA) Part 845 Rule². Specific sections of the report and the applicable sections of the USEPA CCR Rule and Illinois Part 845 Rule are cross-referenced in **Table 1**. A certification from a Qualified Professional Engineer for each of the CCR Rule sections listed in **Table 1** is provided in Section 10 of the attached Report. This certification statement is also applicable to each section of the Part 845 Rule listed in **Table 1**.

Table 1 – USEPA CCR Rule and Illinois Part 845 Rule Cross-Reference

Report Section	USEPA CCR Rule		Illinois Part 845 Rule	
3	§257.73 (a)(2)	Hazard Potential Classification	845.440	Hazard Potential Classification Assessment ³
4	§257.73 (c)(1)	History of Construction	845.220(a)	Design and Construction Plans (Construction History)
5	§257.73 (d)(1)	Structural Stability Assessment	845.450 (a) and (c)	Structural Stability Assessment
6	§257.73 (e)(1)	Safety Factor Assessment	845.460 (a-b)	Safety Factor Assessment
7	§257.82 (a)(1-3)	Adequacy of Inflow Design Control System Plan	845.510(a), (c)(1), (c)(3)	Hydrologic and Hydraulic Capacity Requirements / Inflow Design Flood Control System Plan
	§257.82 (b)	Discharge from CCR Unit	845.510(b)	Discharge from CCR Surface Impoundment

¹ United States Environmental Protection Agency, 2015. *40 CFR Parts 257 and 261, Hazardous and Solid Waste Management System, Disposal of Coal Combustion Residuals from Electric Utilities, Final Rule.*

² State of Illinois, Joint Committee on Administrative Rule, Administrative Code (2021). *Title 35: Environmental Protection, Subtitle G: Waste Disposal, Chapter I: Pollution Control Board, Subchapter j: Coal Combustion Waste Surface Impoundment, Part 845 Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments.*

³ “Significant” and “High” hazard, per the CCR Rule¹, are equivalent to Class II and Class I hazard potential, respectively, per Part 845².

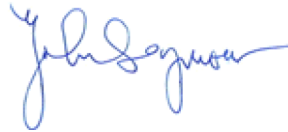
CLOSING

This letter has been prepared to demonstrate that the content and Qualified Professional Engineer Certification of the 2021 Periodic USEPA CCR Rule Certification Report fulfills the corresponding requirements of Part 845 of Illinois Administrative Code listed in **Table 1**.

Sincerely,



Lucas P. Carr, P.E.
Senior Engineer



John P. Seymour P.E.
Senior Principal

**2021 USEPA CCR RULE PERIODIC
CERTIFICATION REPORT
§257.73(a)(2), (c), (d¹), (e) and §257.82
EAST ASH POND
Hennepin Power Plant
Hennepin, Illinois**

Submitted to

Dynegy Midwest Generation, LLC

**1500 Eastport Plaza Drive
Collinsville, Illinois 62234**

Submitted by

Geosyntec 
consultants

engineers | scientists | innovators

1 McBride and Son Center Drive, Suite 202
Chesterfield, Missouri 63005

October 11, 2021

¹ Except for §257.73(d)(1)(vi).

TABLE OF CONTENTS

Executive Summary	1
SECTION 1 Introduction and Background	3
1.1 EAP Description	4
1.2 Report Objectives	6
SECTION 2 Comparison of Initial and PerIodic Site Conditions	7
2.1 Overview	7
2.2 Review of Annual Inspection Reports	7
2.3 Review of Instrumentation Data.....	7
2.4 Comparison of Initial to Periodic Surveys	8
2.5 Comparison of Initial to Periodic Aerial Photography	8
2.6 Comparison of Initial to Periodic Site Visits	9
2.7 Interview with Power Plant Staff.....	9
SECTION 3 Hazard Potential Classification - §257.73(a)(2)	11
3.1 Overview of Initial HPC	11
3.2 Review of Initial HPC.....	11
3.3 Summary of Site Changes Affecting the Initial HPC	11
3.4 Periodic HPC	12
SECTION 4 History of Construction Report - §257.73(c)	13
4.1 Overview of Initial HoC	13
4.2 Summary of Site Changes Affecting the Initial HoC	14
SECTION 5 Structural Stability Assessment - §257.73(d).....	15
5.1 Overview of Initial SSA.....	15
5.2 Review of Initial SSA	15
5.3 Summary of Site Changes Affecting Initial SSA	16
5.4 Periodic SSA	16
SECTION 6 Safety Factor Assessment - §257.73(e)(1)	17
6.1 Overview of Initial SFA.....	17
6.2 Review of Initial SFA	17
6.3 Summary of Site Changes Affecting the Initial SFA	18
6.4 Periodic SFA	18
SECTION 7 Inflow Design Flood Control System Plan - §257.82.....	20
7.1 Overview of Initial IDF.....	20
7.2 Review of Initial IDF	20
7.3 Summary of Site Changes Affecting the Initial IDF	21
7.4 Periodic IDF	22

SECTION 8 Conclusions 26
SECTION 9 Certification Statement..... 27
SECTION 10 References 28

LIST OF FIGURES

Figure 1 Site Location Map
Figure 2 Site Plan

LIST OF TABLES

Table 1 Periodic Certification Summary
Table 2 Initial to Periodic Survey Comparison
Table 3 Factors of Safety from Periodic SFA
Table 4 Water Levels from Periodic IDF

LIST OF DRAWINGS

Drawing 1 Initial to Periodic Survey Comparison
Drawing 2 Survey Comparison Isopach
Drawing 3 Initial to Periodic Aerial Imagery Comparison

LIST OF ATTACHMENTS

Attachment A EAP Piezometer Data Plots
Attachment B EAP Site Visit Photolog
Attachment C Periodic History of Construction Report Update Letter
Attachment D Periodic Structural Stability and Safety Factor Assessment Analyses
Attachment E Periodic Inflow Design Flood Control System Plan Analyses

EXECUTIVE SUMMARY

This Periodic United States Environmental Protection Agency (USEPA) Coal Combustion Residuals (CCR) Rule [1] certification report (Periodic Certification Report) for the East Ash Pond (EAP)² at the Hennepin Power Plant (HPP), also referred to as the Hennepin Power Station (HEN), has been prepared in accordance with Rule 40, Code of Federal Regulations (CFR) §257, herein referred to as the “CCR Rule” [1]. The CCR Rule requires that initial certifications for existing CCR surface impoundment, completed in 2016 and subsequently posted on Dynegy Midwest Generation, LLC (DMG) CCR Website ([2], [3], [4], [5], [6]) be updated on a five-year basis.

The initial certification reports developed in 2016 and 2017 were independently reviewed by Geosyntec ([2], [7], [3], [8], [4], [5], [6]). Additionally, field observations, interviews with plant staff, updated engineering analyses, and evaluations were performed to compare conditions in 2021 at the EAP relative to the 2016 and 2017 initial certifications. These tasks determined that updates are not required for the Initial Hazard Potential Classification. However, due to changes at the site, updates were performed for the:

- History of Construction Report,
- Initial Structural Stability Assessment,
- Initial Safety Factor Assessment, and
- Initial Inflow Design Flood System Control Plan.

Geosyntec’s evaluations of the initial certification reports and updated analyses identified that the EAP meets all requirements for hazard potential classification, history of construction reporting, structural stability assessment, safety factor assessment, and hydrologic and hydraulic control, with the exception of the structural integrity of hydraulic structures (§257.73(d)(1)(vi)), which was independently certified by others. **Table 1** provides a summary of the initial 2016 certifications and the updated 2021 periodic certifications.

² The EAP is also referred to as ID Number W1550100002-05, East New Primary Pond by the Illinois Environmental Protection Agency (IEPA); CCR unit ID 803 by DMG; and IL50363 within the National Inventory of Dams (NID) maintained by the Illinois Department of Natural Resources (IDNR). Within this document it is referred to as the EAP.

Table 1 – Periodic Certification Summary

	CCR Rule Reference	Requirement Summary	2016 Initial Certification		2021 Periodic Certification	
			Requirement Met?	Comments	Requirement Met?	Comments
Hazard Potential Classification						
3	§257.73(a)(2)	Document hazard potential classification	Yes	Impoundment was determined to have Significant hazard potential classification [2].	Yes	Updates were not determined to be necessary. Geosyntec recommends retaining the Significant hazard potential classifications.
History of Construction						
4	§257.73(c)(1)	Compile a history of construction	Yes	A history of Construction report was prepared for the EAP, Old West Polishing Pond, Old West Ash Pond and Ash Pond No. 2 [3].	Yes	A letter listing updates to the History of Construction report is provided in Attachment C .
Structural Stability Assessment						
5	§257.73(d)(1)(i)	Stable foundations and abutments	Yes	Foundations and abutments were found to be stable [8].	Yes	Foundations and abutments were found to be stable after performing updated slope stability analyses.
	§257.73(d)(1)(ii)	Adequate slope protection	Yes	Slope protection was adequate [8].	Yes	No changes were identified that may affect this requirement.
	§257.73(d)(1)(iii)	Sufficiency of dike compaction	Yes	Dike compaction was sufficient for expected ranges in loading conditions [8].	Yes	Dike compaction was found to be sufficient after performing updated slope stability analyses.
	§257.73(d)(1)(iv)	Presence and condition of slope vegetation	Yes	Vegetation was present on exterior slopes and is maintained. Interior slopes had alternate protection (geomembrane liner) [8].	Yes	No changes were identified that may affect this requirement.
	§257.73(d)(1)(v)(A) and (B)	Adequacy of spillway design and management	Yes	Spillways were adequately designed and constructed and were expected to adequately manage flow during 1,000-year flood [8].	Yes	Spillways were found to be adequately designed and constructed and are expected to adequately manage flow during the 1,000-year flood, after performing updated hydrologic and hydraulic analyses.
	§257.73(d)(1)(vi)	Structural integrity of hydraulic structures	No	Requirement could not be certified in 2016 due to inability to complete a CCTV inspection of the discharge pipe into the Polishing Pond due to submerged outfall conditions needed for plant operations. AECOM recommended inspected this pipe as soon as feasible to address the issue [8].		Periodic certification of §257.73(d)(1)(vi) was performed independently by Luminant in 2021 [9].
	§257.73(d)(1)(vii)	Stability of downstream slopes inundated by water body.	Not Applicable	Inundation of exterior slopes was not expected; this requirement was not applicable [8].	Yes	No changes were identified that may affect this requirement.
Safety Factor Assessment						
6	§257.73(e)(1)(i)	Maximum storage pool safety factor must be at least 1.50	Yes	Safety factors were calculated to be 2.14 and higher [5].	Yes	Safety factors from updated slope stability analyses were calculated to be 2.14 and higher.
	§257.73(e)(1)(ii)	Maximum surcharge pool safety factor must be at least 1.40	Yes	Safety factors were calculated to be 2.14 and higher [5].	Yes	Safety factors from updated slope stability analyses were calculated to be 2.14 and higher.
	§257.73(e)(1)(iii)	Seismic safety factor must be at least 1.00	Yes	Safety factors were calculated to be 2.53 and higher [5].	Yes	Safety factors from updated slope stability analyses were calculated to be 2.52 and higher.
	§257.73(e)(1)(iv)	For dike construction of soils that have susceptible to liquefaction, safety factor must be at least 1.20	Not Applicable	Dike soils were not susceptible to liquefaction [5].	Not Applicable	No changes were identified that may affect this requirement.
Inflow Design Flood Control System Plan						
7	§257.82(a)(1), (2), (3)	Adequacy of inflow design control system plan.	Yes	Flood control system adequately manages inflow and peak discharge during the 1,000-year, 24-hour, Inflow Design Flood [8].	Yes	The inflow flood control system was found to adequately manage inflow and peak discharge during the 1,000-year, 24-hour Inflow Design Flood, after performing updated hydrologic and hydraulic analyses.
	§257.82(b)	Discharge from CCR Unit	Yes	Discharges from the CCR Unit is routed through a NPDES-Permitted outfall during both normal and 1,000-year, 24-hour Inflow Design Flood conditions [6].	Yes	Discharge from the CCR Unit is routed through a NPDES-Permitted outfall during both normal and 1,000-year, 24-hour Inflow Design Flood conditions, after performing updated hydrologic and hydraulic analyses.

SECTION 1

INTRODUCTION AND BACKGROUND

This Periodic United States Environmental Protection Agency (USPA) Coal Combustion Residual (CCR) Rule [1] Certification Report was prepared by Geosyntec Consultants (Geosyntec) for Dynegy Midwest Generation, LLC (Dynegy) to document the periodic certification of the East Ash Pond (EAP) at the Hennepin Power Plant (HPP), also known as the Hennepin Power Station (HEN), located at 13498 East 800th Street in Hennepin, Illinois, 61327. The location of HPP is provided in **Figure 1**, and a site plan showing the location of the EAP and LF, among other closed and open CCR units and non-CCR surface impoundments, is provided in **Figure 2**.

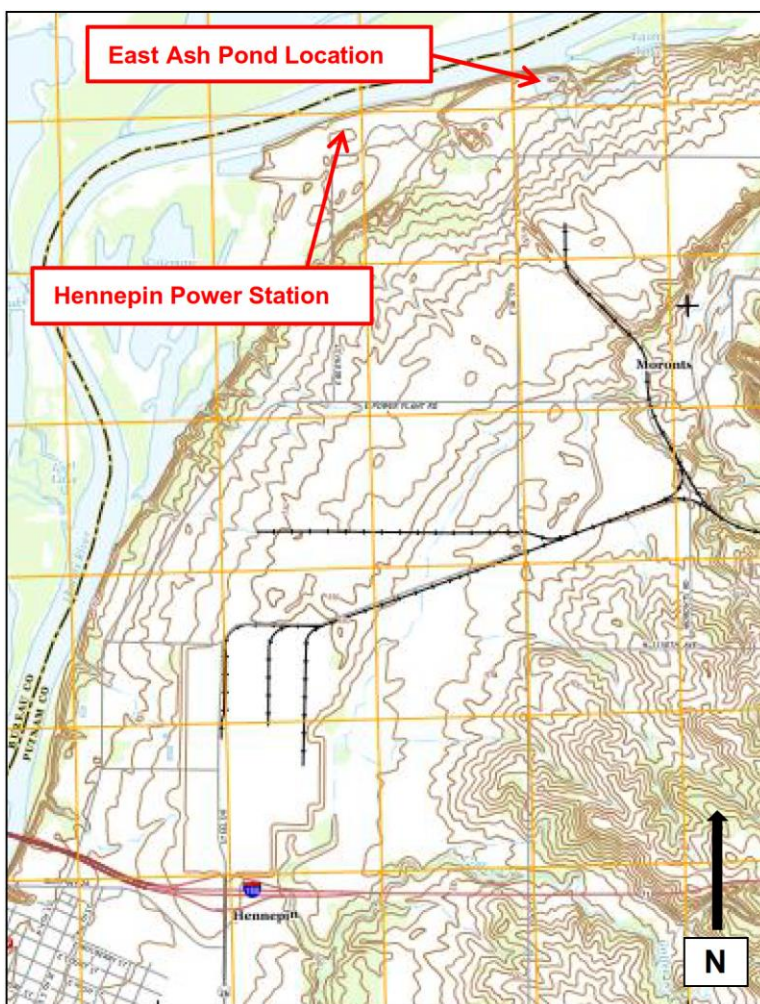


Figure 1 – Site Location Map (from AECOM, 2016)

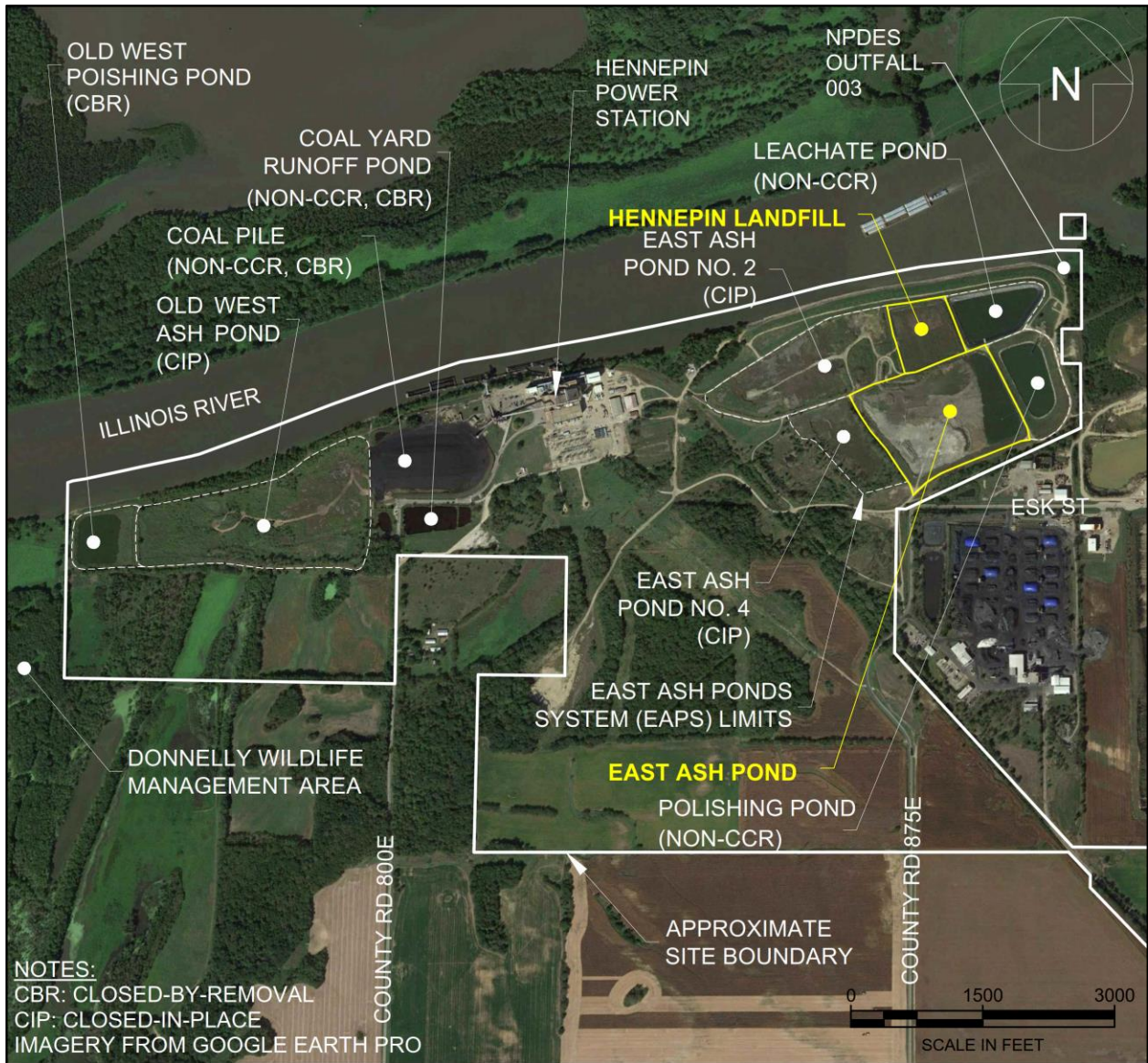


Figure 2 – Site Plan

1.1 EAP Description

The EAP formerly served as a wet impoundment basin for CCR that materials that were produced by HPP, prior to retirement of HPP in 2019. The EAP is approximately 21 acres in area, and the total length of the embankments is approximately 3,800 ft [8]. The EAP formerly received CCR and non-CCR discharge from a single high-density polyethylene (HDPE) sluice pipe that discharged until the northwestern corner of the EAP [8], prior to abandonment of the pipes in 2020 [10].

Outflow from the EAP is discharged downstream into the Leachate Pond, an adjacent non-CCR surface impoundment, via an 18-in diameter reinforced concrete pipe (RCP) culvert, with an invert

elevation³ of 489.9 ft that acts as the primary spillway. Additional outflow is discharged to the Polishing Pond, which is another adjacent non-CCR surface impoundment. Flow from the EAP into the polishing pond is transmitted via a 7- by 9-ft wide concrete riser structure (invert elevation of 490.6 ft) with a generally horizontal 36-in. diameter reinforced concrete pipe (RCP) secondary spillway pipe. Flow from the Leachate Pond is transmitted to the Polishing Pond, which then discharges into the Illinois River at a NPDES-permitted outfall [8].

The EAP is comprised of earthen embankments. Maximum embankment heights on the west and east sides are 16 and 36 feet, respectively, as referenced to the downstream toe. The downstream embankment slopes range from 3.5H:1V (horizontal to vertical) to 4H:1V and the interior slopes have an orientation of 3H:1V above El. 482 ft and 4H:1V below EL. 482 ft. An embankment is not present on the south side of the EAP, where the impoundment is adjacent to natural high ground that slopes upward to the south [3]. The dike on the north side of the EAP is adjacent to East Ash Pond No. 2 (EAP#2), which was closed-in-place in 2020 [10], and final cover grades are similar to the crest elevation of the EAP dike. The dike on the west side of the EAP is adjacent to EAP#4, which was also closed-in-place in 2020 [10]. Embankment crest widths are approximately 18 to 19 ft [8].

The perimeter embankment of the EAP was raised from elevation 483 ft to the current elevations of 493 to 500 ft in the early 2000s. As part of this construction, a double layer of 45-mil reinforced polypropylene geomembrane liner was installed over a 12-inch-thick clay layer on the slopes and keyed into the existing 4-ft thick clay bottom liner system (design permeability of 1×10^{-7} cm/sec) at elevation 480 ft. The clay liner then extends at a 4H:1V slope with the top of liner at an elevation of approximately 460.5 ft. A layer of 8-oz polypropylene geotextile was placed under the 1-ft thick layer of clay and was then terminated at the existing liner. Under the existing 4-ft thick clay layer is a 6-inch-thick sand filter layer on the bottom of the pond and a 12-inch-thick sand layer on the side slopes of the pond [8].

The normal operating pool of the EAP is El. 490.4 ft, as controlled by the primary spillway pipe invert, although the normal pool may lower at times due to the cessation of process flows into the EAP associated with closure of HPP in 2019.

Initial certifications for the EAP for Hazard Potential Classification (§257.73(a)(2)), History of Construction (§257.73(c)), Structural Stability Assessment (§257.73(d)), Safety Factor Assessment (§257.73(e)(1)), and Inflow Design Flood Control System Plan (§257.82) were completed by Stantec and AECOM in 2016 and 2017 and subsequently posted to DMG's CCR Website ([2], [11], [3], [4], [5], [6]). Additional documentation for the initial certifications included a detailed operating record reports containing calculations and other information prepared for the hazard potential classification by Stantec [7] and for the structural stability assessment,

³ All elevations are in the North American Vertical Datum of 1988 (NAVD88), unless otherwise noted.

safety factor assessment, and inflow design flood control system plan by AECOM [8]. These operating record reports were not posted to DMG's CCR Website.

1.2 **Report Objectives**

These following objectives are associated with this report:

- Compare site conditions from 2015/2016, when the initial certifications were developed, to site conditions in 2020/2021, when data for the periodic certification was obtained, and evaluate if updates are required to the:
 - §257.73(a)(2) Hazard Potential Classification [2];
 - §257.73(c) History of Construction [3];
 - §257.73(d) Structural Stability Assessment [4];
 - §257.73(e) Safety Factor Assessment [5], and/or
 - §257.82 Inflow Design Flood Control System Plan [6].
- Independently review the Hazard Potential Classification ([2], [7]), Structural Stability Assessment ([4], [8]), Safety Factor Assessment ([5], [8]), and Inflow Design Flood Control System Plan ([6], [8]) reports to determine if updates may be required based on technical considerations.
 - The History of Construction report [3] was not independently reviewed for technical considerations, as this report contained historical information primarily developed prior to promulgation of the CCR Rule [1] for the CCR units at HPP, and did not include calculations or other information used to certify performance and/or integrity of the impoundments under §257.73(a)(2)-(3), §257.73(c)-(e), or §257.82.
- Confirm that the EAP meets all of the requirements associated with §257.73(a)(2), (c), (d), (e), and §257.82, or, if the EAP does not meet all requirements, provide recommendations for compliance with these sections of the CCR Rule [1].

SECTION 2

COMPARISON OF INITIAL AND PERIODIC SITE CONDITIONS

2.1 Overview

This section describes the comparison of conditions at the EAP between the start of the initial CCR certification program in 2015 and 2016 (initial conditions) and subsequent collection of periodic certification site data in 2020 and 2021 (periodic conditions).

2.2 Review of Annual Inspection Reports

Annual onsite inspections for the EAP were performed between 2016 and 2020 ([12], [13], [14], [15], [16]) and were certified by a licensed professional engineer in accordance with §257.83(b). Each inspection report provided the following information relative to the previous inspection:

- A statement that no changes in geometry of the impounding structure were observed since the previous inspection.
- Information on maximum recorded instrumentation readings and water levels.
- Approximate volumes of impounded water and CCR at the time of inspection.
- A statement that no appearances of actual or potential structural weakness or other disruptive conditions were observed.
- A statement that no other changes which may have affected the stability or operation of the impounding structure were observed.

In summary, the reports did not indicate any significant changes to the EAP between 2015 and 2020. No signs of instability, structural weakness, or changes which may have affected the operation or stability of the EAP were noted in the inspection reports.

2.3 Review of Instrumentation Data

Two piezometers, P006 and P007, are present at the EAP and were monitored monthly by DMG between October 27, 2015 and April 23, 2021. The piezometers are screened in coarse-grained alluvial soils beneath the EAP. Monitoring is still ongoing. Geosyntec reviewed the piezometer data to evaluate if significant fluctuations, partially increases in phreatic levels, may have occurred between development of the initial structural stability and factor of safety certifications ([8], [4], [5]) and April 23, 2021. Available piezometer readings are plotted in **Attachment A**.

In summary, the piezometer readings were consistent during this time period. Piezometer levels in P006 were consistently El. 452 ft, other than two spikes to approximately El. 456 ft that occurred

in May of 2019 and May of 2020. Levels in P007 were somewhat variable, fluctuating between EL. 446 ft and El. 456 ft, with a typical level of around El. 449 ft. These water levels are similar to normal water levels in the adjacent Illinois River and the spikes are coincident with observed flooding events. Piezometer levels are similar to levels utilized for the initial structural stability and factor of safety certifications ([8], [4], [5]).

2.4 Comparison of Initial to Periodic Surveys

The initial survey of the EAP, conducted by Weaver Consultants (Weaver) in 2015 [17], was compared to the periodic survey of the EAP, conducted by IngenAE, LLC (IngenAE) in 2020 [18], using AutoCAD Civil3D 2021 software. This comparison quantified changes in the volume of CCR placed within the EAP and considered volumetric changes above and below the starting water surface elevation (SWSE) used for the 2016 §257.82 inflow design flood control plan hydraulic analysis [8]. Potential changes to embankment geometry were also evaluated. This comparison is presented by showing both surveys side-by-side in **Drawing 1** and in a plan view isopach map denoting changes in ground surface elevation in **Drawing 2**. A summary of the water elevations and changes in CCR volumes is provided in **Table 1**.

Table 2 – Initial to Periodic Survey Comparison

Initial Surveyed Pool Elevation (ft)	490.4
Periodic Surveyed Pool Elevation (ft)	487.5
Initial §257.82 Starting Water Surface Elevation (SWSE) (ft)	490.4
Total Change in CCR Volume (CY)	+ 48,856
Change in CCR Volume Above SWSE (CY)	+26,801
Change in CCR Volume Below SWSE (CY)	+19,038

The comparison indicated that approximately 49,000 CY of CCR was placed in the EAP between the initial and periodic surveys, including approximately 27,000 CY placed above the SWSE thereby leading to a potential for the peak water surface elevation (PWSE) to increase during the inflow design 1,000-year flood event.

2.5 Comparison of Initial to Periodic Aerial Photography

Initial aerial photographs of the EAP collected by Weaver in 2015 [17] were compared to periodic aerial photographs collected by IngenAE in 2020 [18] to visually evaluate if potential site changes (i.e., changes to the embankment, outlet structures, limits of CCR, other appurtenances) may have occurred. A comparison of these aerial photographs is provided in **Drawing 3**, and the following changes were identified:

- Adjacent CCR surface impoundments (East Ash Pond No. 2 and East Ash Pond No. 4) were closed.

- The CCR sluice pipe discharge structure, consisting of a fabric-formed concrete-lined pool and channel that was constructed overlying East Ash Pond No. 2, was removed as part of the East Ash Pond No. 2 closure.
- Additional CCR was placed in the East Ash Pond and the free water pool area was reduced.

2.6 Comparison of Initial to Periodic Site Visits

An initial site visit to the EAP was conducted by AECOM in 2015 and documented with a Site Visit Summary and corresponding photographs [19]. A periodic site visit was conducted by Geosyntec on May 27, 2021, with Mr. Lucas P. Carr, P.E. conducting the site visit. The site visit was intended to evaluate potential changes at the site since the initial certifications were prepared (i.e., modification to the embankment, outlet structures or other appurtenances, limits of CCR, maintenance programs, repairs), in addition to performing visual observations of the EAP to evaluate if the structural stability requirements (§257.73(d)) were still met. The site visit included walking the perimeter access roads and slope crests of the EAP, visually observing conditions, recording field notes, and collecting photographs. The site visit is documented in a photographic log provided in **Appendix A**. A summary of significant findings from the periodic site visit is provided below:

- Maintenance and operational conditions appeared similar between 2015 and 2021.
- No new development was observed in the EAP downstream breach area shown in the Initial EmAP inundation map [11].
- Modifications to the EAP were observed including altering the sluice discharge location as part of the East Ash Pond No. 2 closure and modifying the dike between East Ash Pond No. 4 and the EAP as part of the East Ash Pond No. 4 closure.
- No signs of structural instability were noted. Visual observations did not indicate insufficient slope vegetation and protection, compaction or instability at the dikes or abutments, sudden drawdown instability, or spillway erosion.
- The interior of the culverts connecting the EAP to the Leachate Pond and the EAP to the Polishing Pond could not be visually observed at the time of the site visit due to access and health and safety considerations.

2.7 Interview with Power Plant Staff

An interview with Mr. Jason Stuckey and Mr. Michael Olle of the HPP was conducted by Mr. Lucas P. Carr, P.E. of Geosyntec on May 27, 2021. Mr. Stuckey had been employed at HPP for 14 years and Mr. Olle had been employed at HPP for 13 years at the time of the interview. Mr. Stuckey has been responsible for performing weekly impoundment inspections, managing

maintenance, and operating the EAP since the HPP closed in 2019. The interview included a discussion of potential changes that may have occurred at the EAP since development of the initial certifications ([2], [11], [3], [4], [5], [6]).

- Were any construction projects completed for the EAP since 2015, and, if so, are design drawings and/or details available?
 - No construction projects were completed since 2015.
- Were there any changes to the purpose of the EAP since 2015?
 - CCR placement into the EAP ceased when the HPP was closed in November of 2019. The EAP also received unwatering flows from closure of the Old West Ash Pond and Old West Polishing Pond during 2019 and 2020, via the Coal Pile Runoff Pond, although these flows have since ceased.
- Were there any changes to the to the instrumentation program and/or physical instruments for the EAP since 2015?
 - No known changes have occurred.
- Have area-capacity curves for the EAP been prepared since 2015?
 - No known area-capacity curves have been developed.
- Were there any changes to spillways and/or diversion features for the EAP completed since 2015?
 - The sluice discharge area was partially removed and altered in 2020 as part of the East Ash Pond No. 2 closure.
- Were there any changes to construction specifications, surveillance, maintenance, and repair procedures for the EAP since 2015?
 - No changes have occurred.
- Were there any instances of dike and/or structural instability for the EAP since 2015?
 - No known instances of instability have occurred.

SECTION 3

HAZARD POTENTIAL CLASSIFICATION - §257.73(a)(2)

3.1 Overview of Initial HPC

The Initial Hazard Potential Classification (Initial HPC) was prepared by Stantec Consulting Services, Inc. (Stantec) in 2016 ([2], [7]), following the requirements of §257.73(a)(2). The Initial HPC included the following information:

- Performing a visual analysis to evaluate potential hazards associated with a failure of the EAP perimeter dike, along the east and northeast embankments of the EAP, as the EAP is contained by natural high ground to the south and other CCR units to the west and north.
- Evaluation of potential breach flow paths were evaluated using elevation data and aerial imagery to evaluate potential impacts to downstream structures, infrastructure, frequently occupied facilities/areas, and waterways [2].
- While a breach map is not included within the Initial HPC, it included within the §257.73(a)(3) Initial Emergency Action Plan (Initial EmAP) [11].

The visual analysis indicated that none of the breach scenarios appeared to impact occupied structures, although a breach of the east embankment could impact an infrequently used gravel site access road and a breach to the north would inundate the leachate pond. The Initial HPC concluded that neither breach would be likely to result in a probable loss of human life, although the breach could cause CCR to be released into the Illinois River, thereby causing environmental damage. The Initial HPC therefore recommended a “Significant” hazard potential classification for the EAP [2].

3.2 Review of Initial HPC

Geosyntec performed a review of the Initial HPC ([2], [7]), in terms of technical approach, input parameters, assessment of the results, and applicable requirements of the CCR Rule [1]. No significant technical issues were noted within the technical review, although a detailed review (e.g., check) of the calculations was not performed as the Initial HPC utilized a visual assessment.

3.3 Summary of Site Changes Affecting the Initial HPC

Geosyntec did not identify any changes at the site that may affect the HPC. No new structures, infrastructure, frequently occupied facilities/areas, or waterways were present in the probable breach area indicated in the Initial EmAP [11]. Additionally, no significant changes to the topography in the probable breach were identified.

3.4 Periodic HPC

Geosyntec recommends retaining the “Significant” hazard potential classification for the EAP, per §257.73(a)(2), based on the lack of site changes potentially affecting the Initial HPC occurring since the initial HPC was developed, as described in **Section 3.3**, and the lack of significant review comments, as described in **Section 3.2**. Updates to the Initial HPC reports ([2], [7]) are not recommended at this time.

SECTION 4

HISTORY OF CONSTRUCTION REPORT - §257.73(c)

4.1 Overview of Initial HoC

The Initial History of Construction report (Initial HoC) was prepared by AECOM in 2016 [3], following the requirements of §257.73(c), and included information on all CCR surface impoundments at HPP, including the OWPP, OWAP, EAP#2, EAP#4, and the EAP. The Initial HoC included the following information for each CCR surface impoundment:

- The name and address of the owner/operator,
- Location maps,
- Statements of purpose,
- The names and size of the surrounding watershed,
- A description of the foundation and abutment materials,
- A description of the dike materials,
- Approximate dates and stages of construction,
- Available design and engineering drawings,
- A summary of instrumentation,
- A statement that area-capacity curves are not available,
- Information on spillway structures,
- Constructions specifications,
- Inspection and surveillance plans,
- Information on operational and maintenance procedures, and
- A statement that historical structural instability had not occurred at any of the CCR surface impoundments.

4.2 Summary of Site Changes Affecting the Initial HoC

Several changes at the site that occurred after development of the initial HoC report were identified. These changes required updates to the HoC report. Each change and the corresponding updates to the HoC report [3] are described below:

- A state identification number (ID) of W1550100002-05 was assigned to the EAP by the Illinois Environmental Protection Agency (IEPA).
- Electricity generation at the HPP ceased in 2019. The purpose of the EAP changed to only store CCR that was present at the time of HPP closure. The EAP no longer receives actively generated CCR or process water, as CCR is no longer generated at the HPP. However, the EAP has not yet been closed.
- Other inflows into the EAP including discharge water from the non-CCR Coal Yard Runoff Pond and water from Ash Pond No. 2 were ceased due to closure of those impoundments.
- Revised area-capacity curves and spillway design calculations for the EAP were prepared as part of the updated periodic Inflow Design Flood Control System Plan, as described in **Section 7.3**.

A letter documenting changes to the HoC report is provided in **Attachment C**.

SECTION 5

STRUCTURAL STABILITY ASSESSMENT - §257.73(d)

5.1 Overview of Initial SSA

The Initial Structural Stability Assessment (Initial SSA) was prepared by AECOM in 2016 ([4], [8]), following the requirements of §257.73(d)(1), and included the following evaluations:

- Stability of dike foundations, dike abutments, slope protection, dike compaction, and slope vegetation,
- Spillway stability including capacity, structural stability and integrity; and
- Downstream slope stability under sudden drawdown conditions for a downstream water body.

The Initial SSA concluded that the EAP met all structural stability requirements for §257.73(d)(1)(i)-(v) and (vii). However, the EAP was not certified for the stability and structural integrity criteria for hydraulic outfall structures, per §257.73(d)(1)(vi), as an inspection of the 36-inch secondary spillway pipe between the EAP and Settling Pond was not performed due to the pipe being submerged during normal operating conditions, as required for plant operations. The 18-inch primary spillway pipe between the EAP and Leachate Pond was inspected and certified. The Initial SSA recommended inspection of the secondary spillway pipe.

The Initial SSA referenced the results of the Initial Structural Factor Assessment (Initial SFA) ([5], [8]), to demonstrate stability of the stability of foundations and abutments (§257.73(d)(1)(i)) and sufficiency of dike compaction (§257.73(d)(1)(iii)) portions of the SSA criteria. This included stating that slope stability analyses for slip surfaces passing through the foundation met or exceeded the criteria listed in §257.73(e)(1), for the stability of foundations and abutments. For the sufficiency of dike compaction, this included stating that slope stability analyses for slip surfaces passing through the dike also met or exceeded the §257.73(e)(1) criteria.

5.2 Review of Initial SSA

Geosyntec performed a review of the Initial SSA ([4], [8]) in terms of technical approach, calculation input parameters and methodology, recommendations, and completeness. The review included the following tasks:

- Reviewing photographs collected in 2015 and used to demonstrate compliance with §257.73(d)(1)(i)-(vii);

- Reviewing geotechnical calculations used to demonstrate the stability of foundations, per §257.73(d)(1)(i) and sufficiency of dike compaction, per §257.73(d)(1)(iii), in terms of supporting geotechnical investigation and testing data, input parameters, analysis methodology, selection of critical cross-sections, and loading conditions;
- Review of the methodology used to demonstrate that a downstream water body that could induce a sudden drawdown condition, per §257.73(d)(1)(vii), is not present;
- Completeness and technical approach used to evaluate the stability of hydraulic structures, per §257.73(d)(1)(vi); and
- Reviewing the contents vs. the applicable CCR Rule requirements [1].

No significant technical issues were noted within the technical review of the Initial SSA, although a detailed review (e.g., check) of the calculations was not performed.

5.3 Summary of Site Changes Affecting Initial SSA

Several changes at the site that occurred after development of the Initial SSA were identified. These changes required updates to the Initial SSA and are described below:

- The Initial SSA utilized the results of the Initial Inflow Design Flood Control System Plan (IDF) to demonstrate compliance with the adequacy of spillway design and management (§257.73(d)(1)(v)(A)-(B)). The Initial IDF was subsequently updated to develop a Periodic IDF, based on site changes, as discussed in **Section 7**.
- The Initial SSA utilized the slope stability analysis results of the Initial Safety Factor Assessment (SFA) as part of the compliance demonstration for the stability of foundations and abutments (§257.73(d)(1)(i)) and sufficiency of dike compaction (§257.73(d)(1)(iii)) as discussed in **Section** Error! Reference source not found.. The Initial SFA slope stability analyses were subsequently updated to develop a Periodic SFA, based on site changes, as discussed in **Section 6**.

5.4 Periodic SSA

The Periodic SFA (**Section 6**) indicates that foundations and abutments are stable and dike compaction is sufficient for expected ranges in loading conditions, as slope stability factors of safety were found to meet or exceed the requirements of §257.73(e)(1). Therefore, the requirements of §257.73(d)(1)(i) and §257.73(d)(1)(iii) are met for the Periodic SSA.

The Periodic IDF (**Section 7**) indicates that spillways are adequately designed and constructed to adequately manage flow during the 1,000-year flood, as the spillways can adequately manage flow during peak discharge from the 1,000-year storm event without overtopping of the embankments. Therefore, the requirements of §257.73(d)(1)(v)(A)-(B) are met for the Periodic SSA. Certification of §257.73(d)(1)(vi) was independently performed by Luminant [9].

SECTION 6

SAFETY FACTOR ASSESSMENT - §257.73(e)(1)

6.1 Overview of Initial SFA

The Initial Safety Factor Assessment (Initial SFA) was prepared by AECOM in 2016 ([5], [8]), following the requirements of §257.73(e)(1). The Initial SFA included the following information:

- A geotechnical investigation program with in-situ and laboratory testing.
- An assessment of the potential for liquefaction in the dike and foundation soils.
- The development of two slope stability cross-sections for limit equilibrium stability analysis utilizing GeoStudio SLOPE/W software.
- The analysis of both cross-sections for maximum storage pool, maximum surcharge pool, and seismic loading conditions.
- Liquefaction loading conditions were not evaluated as liquefaction-susceptible soil layers were not identified in the either the embankments or foundation soils.

The Initial SFA concluded that the EAP met all safety factor requirements, per §257.73(e), as all calculated safety factors were equal to or higher than the minimum required values.

6.2 Review of Initial SFA

Geosyntec performed a review of the Initial SFA ([5], [8]) in terms of technical approach, calculation input parameters and methodology, recommendations, and completeness. The review included the following tasks:

- Reviewing geotechnical calculations used to demonstrate the acceptable safety factors, per §257.73(e)(1), in terms of:
 - Completeness and adequacy of supporting geotechnical investigation and testing data.
 - Completeness and approach of liquefaction triggering assessments.
 - Analyzed loading conditions relative to the applicable CCR Rule [1] requirements and site-specific conditions.

- Input parameters, analysis methodology, selection of critical cross-sections, loading conditions, and piezometric/groundwater levels utilized for slope stability analyses.
- Reviewing the contents vs. the applicable CCR Rule requirements [1].

No significant technical issues were noted within the technical review, although a detailed review (e.g., check) of the calculations was not performed.

6.3 Summary of Site Changes Affecting the Initial SFA

Several changes at the site that occurred after development of the Initial SFA were identified. These changes required updates to the Initial SFA and are described below:

- Additional CCR was placed below the SWSE in the free water pool upstream of the dike between the EAP and the Polishing Pond, thereby potentially applying additional load to the EAP dike than was present at the time of the Initial SFA.
- The Periodic IDF (**Section 7**) found that the normal pool elevation within the EAP decreased from 490.4 to 490.0 ft, resulting in 0.4 ft less water loading on the embankment dikes than was considered in the Initial SFA for the maximum storage pool and seismic loading conditions (§257.73(e)(1)(i) and (iii)). Peak water surface elevations during the IDF also decreased from 492.9 to 491.4 ft, resulting in 1.5 ft less water loading on the embankment dikes than was considered in the Initial SFA for the maximum surcharge pool loading conditions (§257.73(e)(1)(i)).

6.4 Periodic SFA

Geosyntec revised existing slope stability analyses associated with the Initial SFA ([5], [8]) for two cross-sections (SL-10 & SL-12) previously evaluated to account for site changes, as described in **Section 6.3**. The following approach and input data were used to revise the analyses:

- Ground surface geometry was revised for all the loading conditions in section SL-10 and SL-12 using the 2021 site survey [18] to account for the changes that occurred to CCR grades.
- Water levels in the EAP for the maximum storage pool, and seismic slope stability analysis loading conditions were decreased to El. 490.0 ft for section SL-10 and section SL-12, based on the Periodic IDF.
- Water levels in the EAP for the maximum surcharge pool slope stability analysis loading conditions were decreased to El. 491.4 ft for section SL-10 and section SL-12, based on the Periodic IDF.

Factors of safety from the Periodic SFA are summarized in **Table 3** and confirm that the EAP meets the requirements of §257.73(e)(1). Slope stability analysis output associated with the Initial SFA is provided in **Attachment D**.

Table 3 – Factors of Safety from Periodic SFA

Structural Stability Assessment (§257.73(d)) and Safety Factor Assessment (§257.73(e))				
Cross-Section	Maximum Storage Pool §257.73(e)(1)(i) Minimum Required = 1.50	Maximum Surcharge Pool¹ §257.73(e)(1)(ii) Minimum Required = 1.40	Seismic §257.73(e)(1)(iii) Minimum Required = 1.00	Dike Liquefaction §257.73(e)(1)(iv) Minimum Required = 1.20
SL-10	2.14*	2.14*	4.22	N/A
SL-12	3.16	3.16	2.52*	N/A

Notes:

*Indicates critical cross-section (i.e., lowest calculated factor of safety out of the two cross-sections analyzed)

N/A – Loading condition is not applicable.

SECTION 7

INFLOW DESIGN FLOOD CONTROL SYSTEM PLAN - §257.82

7.1 Overview of Initial IDF

The Initial Inflow Design Flood Control System Plan (Initial IDF) was prepared by AECOM in 2016 ([6], [8]), following the requirements of §257.82. The Initial IDF included the following information:

- A hydraulic and hydrologic analysis, performed for the 1,000-year design flood event because of the hazard potential classification of “Significant”, which corresponded to 9.70 inches of rainfall over a 24-hour period.
- The Initial IDF utilized a HydroCAD Version 10 model to evaluate spillway flows and pool level increases during the IDF, with an EAP SWSE of 490.4 ft and considered water flows between the EAP and the interconnected adjacent ponds.

The Initial IDF concluded that the EAP met the requirements of §257.82, as the peak water surface estimated by the HydroCAD model was El. 492.2 ft, relative to a minimum EAP dike crest elevation of 493.0 ft. Therefore, EAP embankment overtopping was not expected from the evaluated IDF. The Initial IDF also evaluated the potential for discharge from the CCR unit, and determined discharge from the EAP during both normal and inflow design flood conditions was expected to be routed through the existing spillway and NDPES-permitted outfall.

7.2 Review of Initial IDF

Geosyntec performed a review of the Initial IDF ([6], [8]) in terms of technical approach, calculation input parameters and methodology, recommendations, and completeness. The review included the following tasks:

- Reviewing the return interval used vs. the hazard potential classification.
- Reviewing the rainfall depth and distribution for appropriateness.
- Performing a high-level review of the inputs to the hydrological modeling.
- Reviewing the hydrologic model parameters for spillway parameters, starting pool elevation, and storage vs. the reference data.
- Reviewing the overall Initial IDF vs. the applicable requirements of the CCR Rule [1].

Several comments were identified during review of the Initial IDF. The comments are described below:

- The Initial IDF utilized the National Resource Conservation Service (NRCS) Type II rainfall distribution type [20]. Geosyntec recommends utilizing the Huff 3rd Quartile distribution for areas less than 10 square miles [21] for the reasons listed below.
 - Huff 3rd Quartile distribution was identified to be a more appropriate representation of a 1,000-year, 24-hour storm event per the Illinois State Water Survey (ISWS) Circular 173 [22] which developed standardized rainfall distributions from compiled rainfall data at sites throughout Illinois.
 - Illinois Department of Natural Resources, Office of Water Resources (IDNR-OWR) [23] recommends use of the Huff Quartile distributions in Circular 173 when using frequency events to determine the spillway design flood inflow hydrograph, *“The suggested method to distribute this rainfall is described in the ISWS publication, Circular 173, “Time Distributions of Heavy Rainstorms in Illinois”.*
- The dimensions of hydraulic structures within the EAP and East Leachate Pond were reported to be larger than the dimensions included within the hydrologic and hydraulic analysis file.
- Hydrologic soil group types for some areas require updates based on conditions observed at HPP.

7.3 Summary of Site Changes Affecting the Initial IDF

Several changes at the site that occurred after development of the Initial IDF were identified. These changes required updates to the Initial IDF and are described below:

- Approximately 27,000 CY of CCR were placed above the SWSE utilized for the Initial IDF certification, thereby altering the stage-storage curve for the EAP relative to the Initial IDF. Process inflows to the EAP have ceased due to the cessation of operations at the HPP, thereby the process inflow conditions utilized in the Initial IDF were no longer consistent with conditions observed in 2020
- Minor differences in the surveyed elevations of pipe inverts and dike crest elevations were noted between the initial and periodic site surveys.
- Two 12-inch diameter culverts connecting the EAP to the Leachate Pond were noted in the 2020 site survey and had not been included in the Initial IDF hydrologic and hydraulic analysis.

- Several changes to the ground surface within the EAP occurred, including a reduction in the area of the EAP due to closure of adjacent East Ash Pond No. 2.

7.4 Periodic IDF

Geosyntec revised the HydroCAD model associated with the Initial IDF to account for the revised rainfall distribution type, cessation of process flows, and additional CCR placement, as described in **Sections 7.3**. The following approach and input data were used for the revised analyses and are referenced in **Attachment E**:

- Stage-storage (i.e., area-capacity) curves for the EAP were updated based on the 2020 site survey [18].
 - A revised stage-volume curve for the EAP was prepared based on measuring the storage volume of the EAP at every one-foot increment of depth from the minimum depth (482 ft) to the typical crest elevation (495 ft). This analysis identified an overall decrease of 20,777 CY (13 ac-ft) of storage volume at the EAP from 2016 to 2021.
- The SWSE within the EAP was updated from 490.4 ft to 490.0 ft and Leachate Pond from 485.0 ft to 485.1 ft to reflect spillway invert updates detailed by the 2020 site survey [18].
 - The 2016 certification included an addition of 0.5 ft to the SWSE at the EAP to account for process flows. Plant operations, including process flow generation and unwatering of CCR units at the site have since ceased. Inflows in excess of stormwater are omitted from this model; however, the SWSE of each pond is set to the surveyed WSE or the discharge structure invert, whichever is greater, to provide conservatism in the updated model.
- The minimum dike crest elevation of EAP was updated from 493.0 ft to 492.0 ft to reflect the 2020 site survey [18].
- The precipitation depth for the 1,000-year, 24-hour design storm event was updated from 9.70 inches to 9.72 inches per NOAA Atlas 14 precipitation frequency estimates [24].
- The rainfall distribution type was updated to the “Huff 3rd Quartile” storm type provided by HydroCAD [25].
- The following hydrologic parameters for drainage areas were updated:
 - The time of concentration flow path for the Landfill drainage area, which drains into the Leachate Pond and therefore is part of the multi-pond hydraulic system including the EAP, was updated based on the 2020 site survey. The surface description of the shallow concentrated flow corresponding to the exposed geomembrane segment was changed to “unpaved” to account for the smooth surface.

- The curve numbers for the EAP and Polishing Pond drainage areas were updated to reflect hydrologic soil group (HSG) D soils. The Initial IDF considered these areas as HSG C; however, the NRCS soil survey referenced in the Initial IDF describes these areas as predominately “Pits, gravel” with no HSG rating. A HSG rating of D was selected for conservatism.
- The EAP drainage area was updated to reflect the 2020 site survey. Grading changes along the northern edge of the pond associated with closure of East Ash Pond No. 2 resulted in a decrease of 1.05 acres. CCR placement in the EAP resulted in an increase of exposed CCR material and decrease of water surface. CCR surface, identified as “Urban industrial, 72% imp” land use, increased from 810.0 ac to 16.7 ac and water surface decreased from 7.8 ac to 1.5 ac. Gravel surfaces were considered to account for 25% of the drainage area exterior to the exposed CCR and grass cover for the remainder of the area. Gravel land use was updated from 1.095 ac to 1.120 ac and grass land use was updated from 4.9 ac to 3.4 ac.
- The following pipe parameters were updated based on length measurements from pipe inspections performed as part of the Initial SSA ([4], [8]) and invert elevations from the 2020 site survey [18]:
 - 18-inch diameter culvert conveying flow from EAP to the Leachate Pond:
 - Updated length from 70 linear feet (LF) to 61 LF, per the pipe inspections.
 - Updated inlet invert from 489.9 ft to 490.0 ft per the 2020 survey.
 - Updated outlet invert from 487.2 ft to 486.8 ft per the 2020 survey.
 - 36-inch diameter culvert conveying flow from EAP to Polishing Pond:
 - Updated length from 300 LF to 283 LF per design drawing CE-HEN1-C3 included in the History of Construction report [3], with the length calculated from northing and easting values.
 - Added two, 12-inch diameter pipes conveying flow from EAP to the Leachate Pond:
 - Diameters were calculated as the nearest typical pipe diameter calculated from difference between top of pipe and invert elevation.
 - Length of 97 LF estimated per the 2020 site survey.
 - Higher invert elevation of two pipes, 492.66 ft, used in model.
 - Outlet invert of 488.34 ft per the 2020 site survey.

- Manning's n value of 0.010 corresponding to smooth plastic pipe per conditions observed during Geosyntec's site visit.
- 24-inch diameter culvert conveying flow from Leachate Pond to the Polishing Pond:
 - Updated length from 162 LF to 157 LF per the pipe inspections.
 - Updated inlet invert from 480.48 ft to 480.40 ft per the 2020 site survey.
 - Updated outlet invert from 479.73 ft to 479.81 ft per the 2020 site survey.
- 36-inch diameter culvert conveying flow from Polishing Pond to the NPDES outfall at the Illinois River:
 - Updated length from 613 LF to 655 LF per design drawing CE-HEN1-C3 included in the History of Construction Report, with the length calculated from northing and easting values.
 - Updated outlet invert from 452.00 ft to 452.16 ft per the 2020 site survey.
- The following outlet structure parameters were updated:
 - EAP:
 - Top of outlet structure elevation updated from 493.2 ft to 493.5 ft per 2020 site survey.
 - Top opening dimensions updated from 60-in by 36-in to 84-in by 108-in to be consistent with the description of the structure in the Initial IDF.
 - Leachate Pond:
 - Top of outlet structure elevation updated from 485.0 ft to 485.1 ft per 2020 site survey.
 - Polishing Pond:
 - Top opening dimensions updated from 60-in by 36-in to 84-in by 108-in to be consistent with the description of the structure in the Initial IDF.
- All other input data and settings from the Initial IDF HydroCAD model were utilized, including, but not limited to software package and version, runoff method, analysis time span and analysis time step.

The results of the Updated IDF are summarized in **Table 4** and confirm that the EAP meets the requirements of §257.82(a)-(b), as the peak water surface elevation does not exceed the minimum perimeter dike crest elevations. Additionally, all discharge from the EAP is routed through the

existing spillway system to the NPDES-permitted outfall, during both normal and IDF conditions. Updated area-capacity curves and HydroCAD model output is provided in **Attachment E**.

Table 4- Water Levels from Periodic IDF

Analysis	East Ash Pond		
	Starting Water Surface Elevation (ft)	Peak Water Surface Elevation (ft)	Minimum Dike Crest Elevation (ft)
Initial IDF	490.4	492.9	493.0
Updated Periodic IDF	490.0	491.4	492.0
Initial to Periodic Change ¹	-0.4	-1.5	

Notes:

¹Positive change indicates increase in the WSE relative to the Initial IDF, negative change indicates decrease in the WSE, relative to the Initial IDF

SECTION 8

CONCLUSIONS

The EAP at HPP was evaluated relative to the USEPA CCR Rule periodic assessment requirements for:

- Hazard potential classification (§257.73(a)(2)),
- History of Construction reporting (§257.73(d)),
- Structural stability assessment (§257.73(d)), with the exception of §257.73(d)(1)(vi) that was independently certified by Luminant [9],
- Safety factor assessment (§257.73(e)), and
- Inflow design flood control system planning (§257.82).

Based on the evaluations presented herein, the referenced requirements are satisfied.

SECTION 9

CERTIFICATION STATEMENT

CCR Unit: Dynegy Midwest Generation, LLC, Hennepin Power Plant, East Ash Pond

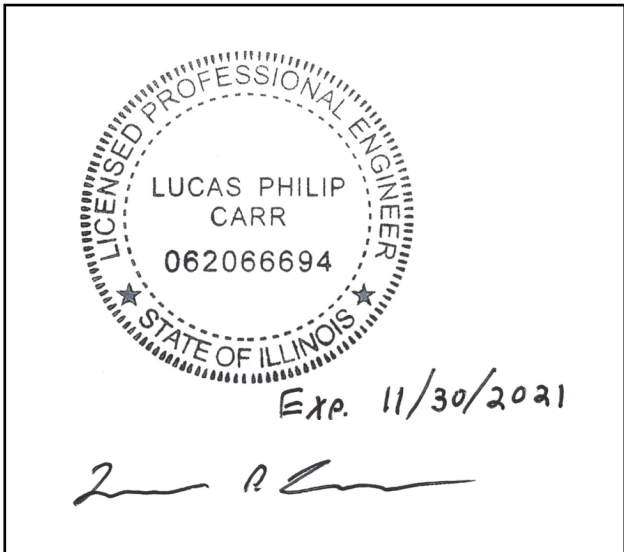
I, Lucas P. Carr, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this 2021 USEPA CCR Rule Periodic Certification Report, has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the periodic assessment of the hazard potential classification, history of construction report, structural stability, safety factors, and inflow design flood control system planning, dated October 2021, were conducted in accordance with the requirements of 40 CFR §257.73(a)(2), (c), (d), (e), and §257.82, with the exception of §257.73(d)(1)(vi)) that was independently certified by others.

Lucas P. Carr

Printed Name

10/11/2021

Date



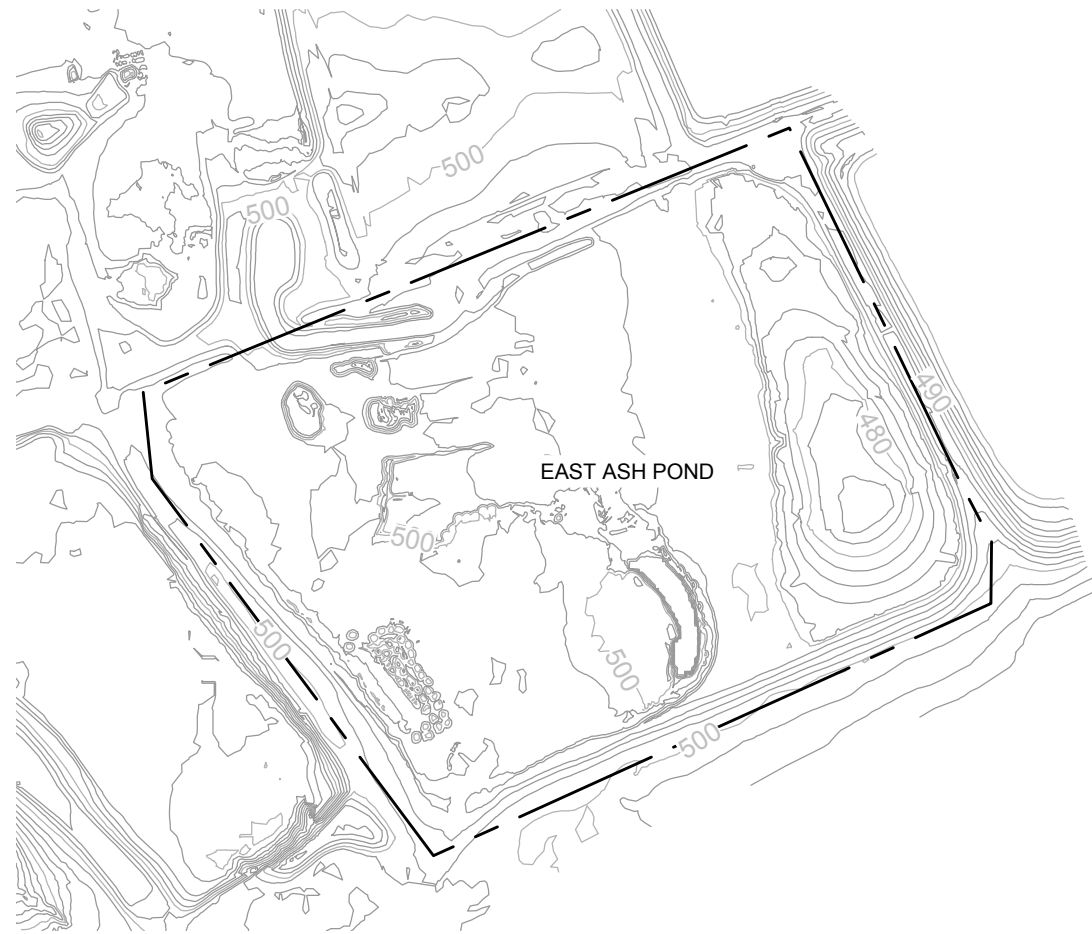
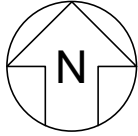
SECTION 10

REFERENCES

- [1] United States Environmental Protection Agency, 40 CFR Parts 257 and 261; Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, 2015.
- [2] Stantec Consulting Services Inc., "Initial Hazard Potential Classification Assessment, EPA Final CCR Rule, East Ash Pond, Hennepin Power Station, Putnam County, Illinois," Fenton, MO, October 12, 2016.
- [3] AECOM, "History of Construction, USEPA Final CCR Rule, Hennepin Power Station, Hennepin, Illinois," October 2016.
- [4] AECOM, "CCR Rule Report: Initial Structural Stability Assessment For East Ash Pond At Hennepin Power Station," St. Louis, MO, October 2016.
- [5] AECOM, "CCR Rule Report: Initial Safety Factor Assessment For East Ash Pond At Hennepin Power Station," St. Louis, MO, October 2016.
- [6] AECOM, "CCR Rule Report: Initial Inflow Design Flood Control System Plan For East Ash Pond At Hennepin Power Station," St. Louis, MO, October 2016.
- [7] Stantec Consulting Services, Inc., "Documentation of Initial Hazard Potential Classification Assessment, East Ash Pond, Hennepin Power Station, Hennepin, Illinois," October 12, 2016.
- [8] AECOM, "CCR Certification Report: Initial Structural Stability Assessment, Initial Safety Factor Assessment, and Initial Inflow Design Flood Control System Plan for East Ash Pond at Hennepin Power Station," St. Louis, MO, October 2016.
- [9] V. Modeer, "Dynergy Midwest Generation, LLC, Hennepin Power Station," 2021.
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- [11] Stantec Consulting Services Inc, "Dynergy Midwest Generation, LLC, Hennepin Power Station, Village of Hennepin, Putnam County, IL, Emergency Action Plan, East Ash Pond (NID # IL50363)," Fenton, MO, April 13, 2017.
- [12] J. Knutelski and J. Campbell, "Annual CCR Surface Impoundment Inspection Report (per 40 CFR 257.83(b)(2)), Hennepin Power Station, East Ash Pond," November 2, 2016.
- [13] J. Knutelski and J. Campbell, "Annual CCR Surface Impoundment Inspection Report (per 40 CFR 257.83(b)(2)), Hennepin Power Station, East Ash Pond," August 10, 2017.
- [14] S. Arends, "Annual Inspection by a Qualified Professional Engineer, 40 CFR §257.83(b), Hennepin Power Station, East Ash Pond," November 30, 2019.
- [15] J. Knutelski, "Annual Inspection by a Qualified Professional Engineer, 40 CFR 257.83(b), Hennepin Power Station, East Ash Pond," January 10, 2020.

- [16] Knutelski, James, "Annual Inspection by a Qualified Professional Engineer, 40 CFR §257.83(b), Hennepin Power Station, East Ash Pond," January 6, 2021.
- [17] Weaver Consultants Group, "Dynergy, Collinsville, IL, 2015 - Hennepin Topography," Collinsville, IL, December 2015.
- [18] IngenAE, "Luminant, Dynergy Midwest Generation, LLC, Hennepin Power Station, December 2020 Topography," Earth City, Missouri, March 10, 2021.
- [19] AECOM, "Draft CCR Unit Initial Site Visit Summary, Dynergy CCR Compliance Program," June 15, 2015.
- [20] Natural Resources Conservation Service, Conservation Engineering Division, "Urban Hydrology for Small Watersheds (TR-55)," United States Department of Agriculture, June 1985.
- [21] F. A. Huff and J. R. Angel, "Frequency Distributions and Hydroclimatic Characteristics of Heavy Rainstorms in Illinois," State Water Survey Division, Department of Energy and Natural Resources, State of Illinois, Champaign, Illinois, 1989.
- [22] F. A. Huff, "Time Distributions of Heavy Rainstorms in Illinois," State Water Survey, Department of Energy and Natural Resources, State of Illinois, Champaign, Illinois, 1990.
- [23] Office of Natural Resources, "Procedural Guidelines for Preparation of Technical Data to be included in Applications for Permits for Construction and Maintenance of Dams," Department of Natural Resources, State of Illinois, Springfield, Illinois, Undated.
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DRAWINGS



INITIAL SURVEY
12-01-2015 TOPOGRAPHY



PERIODIC SURVEY
03-10-2021 TOPOGRAPHY



NOTES:

1. THE INITIAL SURVEY WAS TAKEN FROM THE DRAWING PACKAGE TITLED "DYNEGY, COLLINSVILLE, ILLINOIS, 2015 - HENNEPIN TOPOGRAPHY", PREPARED BY WEAVER CONSULTANTS GROUP, DATED DECEMBER 1, 2015.
2. THE PERIODIC SURVEY WAS TAKEN FROM THE DRAWING PACKAGE TITLED "LUMINANT, DYNEGY MIDWEST GENERATION, LLC, HENNEPIN POWER STATION, DECEMBER 2020 TOPOGRAPHY", PREPARED BY INGENAE, DATED MARCH 10, 2021.
3. ALL SURVEY DATA WAS COLLECTED IN THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88) AND NORTH AMERICAN DATUM OF 1983 (NAD83) FOR VERTICAL AND HORIZONTAL COORDINATES, RESPECTIVELY.

INITIAL TO PERIODIC SURVEY COMPARISON
EAST ASH POND
HENNEPIN POWER STATION
HENNEPIN, ILLINOIS



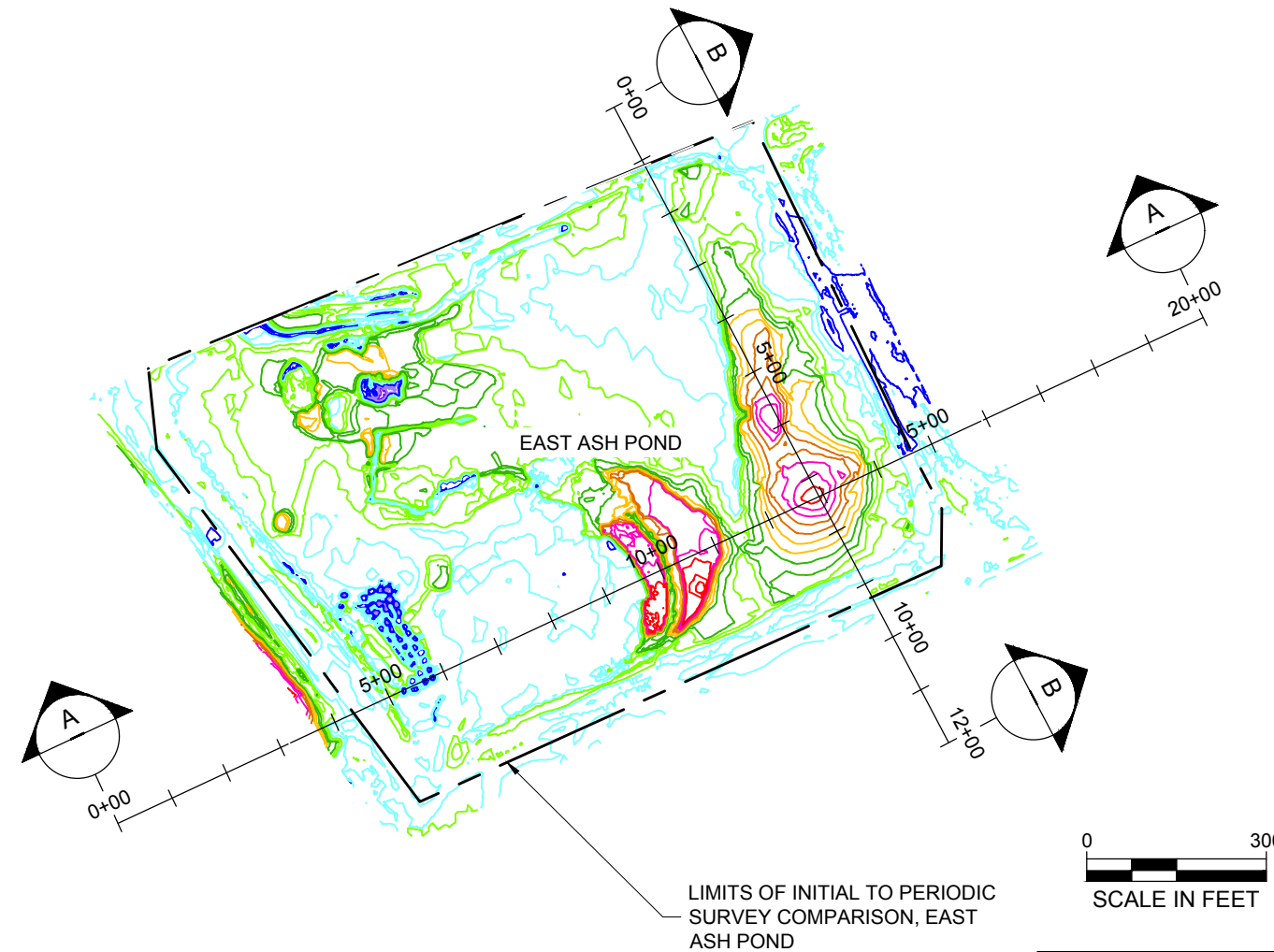
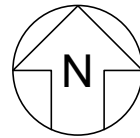
DRAWING

1

GLP8027.05

MAY 2021

P:\CADD\PROJECTS\VIVISTRA POND\SHENNEPIN\ISOPACH-2 - Last Saved by: KHanavec on 5/17/21

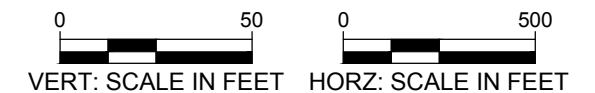
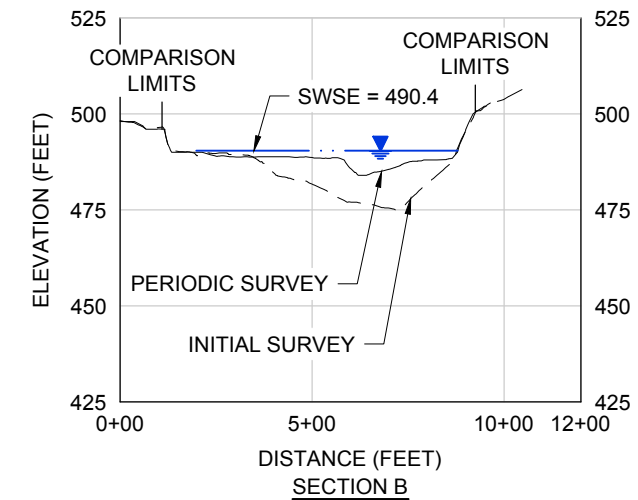
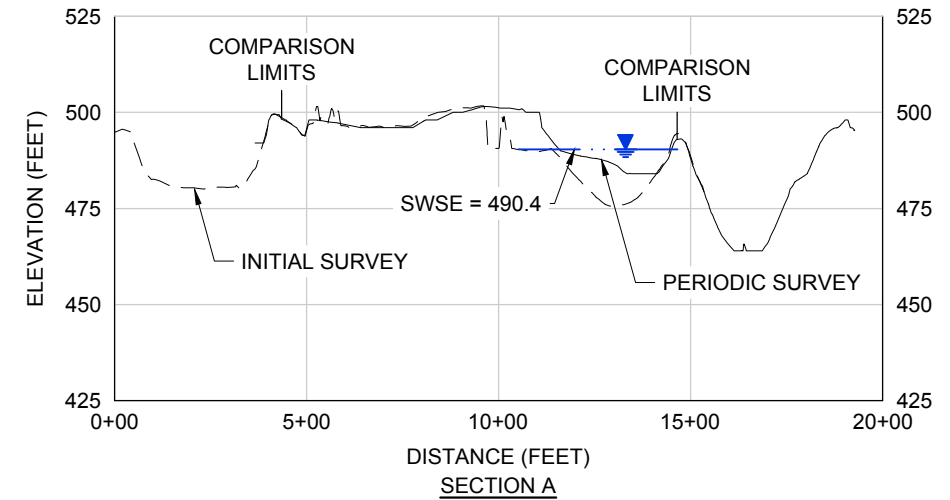


ISOPACH CONTOUR KEY		
COLOR	MIN ELEV	MAX ELEV
Blue	-8	-6
Light Blue	-6	-4
Dark Blue	-4	-2
Cyan	-2	0
Light Green	0	2
Green	2	4
Yellow-Green	4	6
Yellow	6	8
Orange	8	10
Red	10	14

NOTES:

1. THE INITIAL SURVEY WAS TAKEN FROM THE DRAWING PACKAGE TITLED "DYNEGY, COLLINSVILLE, ILLINOIS, 2015 - HENNEPIN TOPOGRAPHY", PREPARED BY WEAVER CONSULTANTS GROUP, DATED DECEMBER 1, 2015.
2. THE PERIODIC SURVEY WAS TAKEN FROM THE DRAWING PACKAGE TITLED "LUMINANT, DYNEGY MIDWEST GENERATION, LLC, HENNEPIN POWER STATION, DECEMBER 2020 TOPOGRAPHY", PREPARED BY INGENAE, DATED MARCH 10, 2021.
3. ALL SURVEY DATA WAS COLLECTED IN THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88) AND NORTH AMERICAN DATUM OF 1983 (NAD83) FOR VERTICAL AND HORIZONTAL COORDINATES, RESPECTIVELY.
4. THE STARTING WATER SURFACE ELEVATION (SWSE) OF THE BOTTOM ASH POND IS EL. 490.4 FT, AS NOTED IN THE REPORT TITLED "CCR CERTIFICATION REPORT: INITIAL STRUCTURAL STABILITY ASSESSMENT, INITIAL SAFETY FACTOR ASSESSMENT, AND INITIAL INFLOW DESIGN FLOOD CONTROL SYSTEM PLAN FOR EAST ASH POND AT HENNEPIN POWER STATION", PREPARED BY AECOM, DATED OCTOBER, 2016.

INITIAL TO PERIODIC SURVEY COMPARISON SUMMARY			
CCR SURFACE IMPOUNDMENT	CUT	FILL	NET (CU. YD.)
EAST ASH POND	7,595	53,452	45,856 (FILL)
ABOVE SWSE	6,469	33,270	26,801 (FILL)
BELOW SWSE	1,156	20,194	19,038 (FILL)



SURVEY COMPARISON ISOPACH
EAST ASH POND
HENNEPIN POWER STATION
HENNEPIN, ILLINOIS

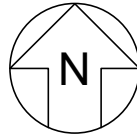


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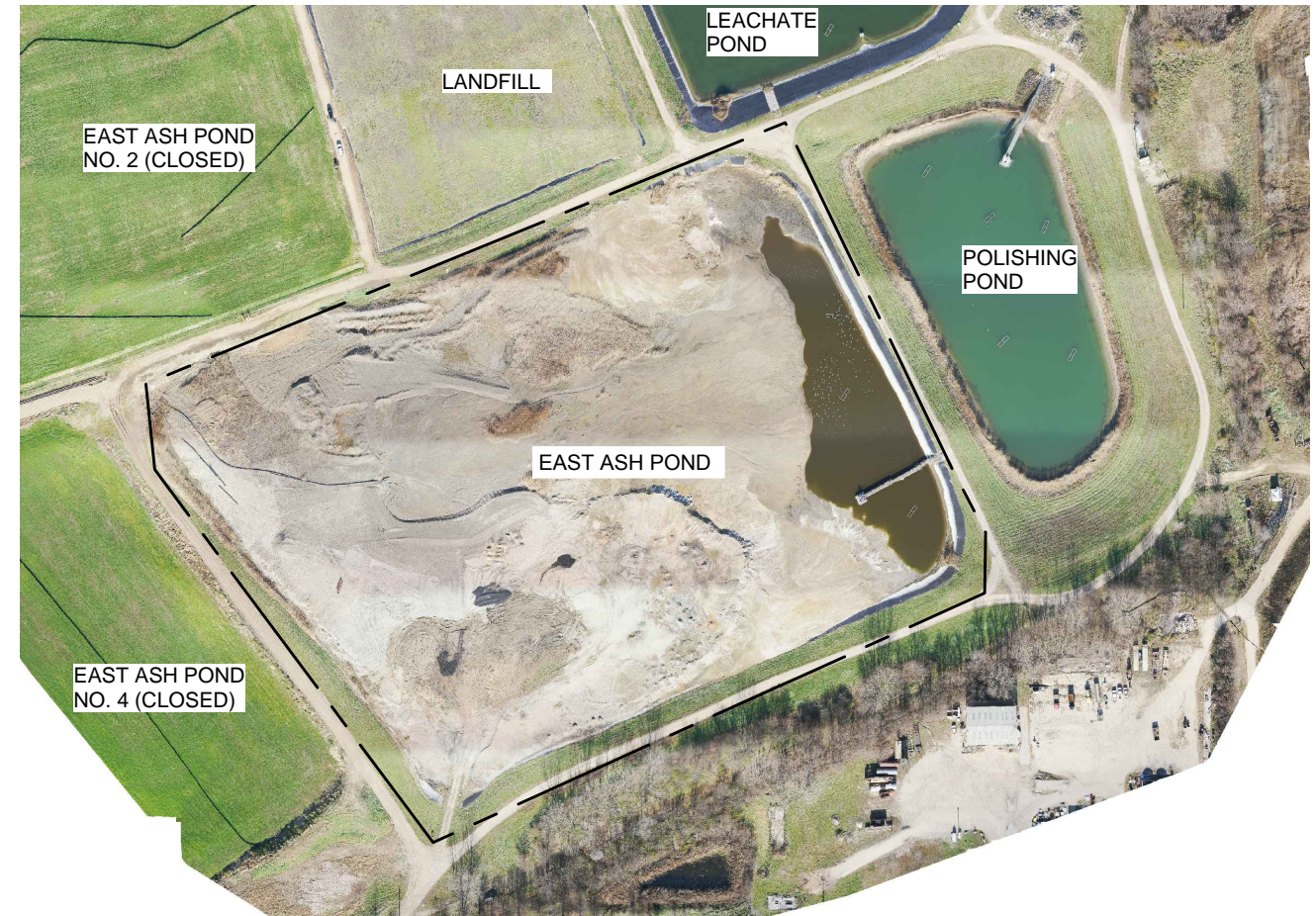
MAY 2021

DRAWING

2



INITIAL AERIAL
12-01-2015 IMAGERY



PERIODIC AERIAL
03-10-2021 IMAGERY



NOTES:

1. THE INITIAL IMAGERY WAS TAKEN FROM THE DRAWING PACKAGE TITLED "DYNEGY, COLLINSVILLE, ILLINOIS, 2015 - HENNEPIN TOPOGRAPHY", PREPARED BY WEAVER CONSULTANTS GROUP, DATED DECEMBER 1, 2015.
2. THE PERIODIC IMAGERY WAS TAKEN FROM THE DRAWING PACKAGE TITLED "LUMINANT, DYNEGY MIDWEST GENERATION, LLC, HENNEPIN POWER STATION, DECEMBER 2020 TOPOGRAPHY", PREPARED BY INGENAE, DATED MARCH 10, 2021.

INITIAL TO PERIODIC AERIAL IMAGERY
COMPARISON
EAST ASH POND
HENNEPIN POWER STATION
HENNEPIN, ILLINOIS



DRAWING

3

GLP8027.05

MAY 2021

ATTACHMENTS

Attachment A

EAP Piezometer Data Plots

Attachment B

EAP Site Visit Photolog

GEOSYNTEC CONSULTANTS
Photographic Record



Site Owner: Dynegy Midwest Generation, LLC

Project Number: GLP8027

CCR Unit: East Ash Pond (EAP)

Site: Hennepin Power Plant

Photo: 01

Date: 05/27/2021

Direction Facing:
SE

Comments:
Overview of EAP.



Photo: 02

Date: 05/27/2021

Direction Facing:
SE

Comments:
Interior slope
vegetation of EAP.



GEOSYNTEC CONSULTANTS
Photographic Record



Site Owner: Dynegy Midwest Generation, LLC

Project Number: GLP8027

CCR Unit: East Ash Pond (EAP)

Site: Hennepin Power Plant

Photo: 03

Date: 05/27/2021

Direction Facing:
SE

Comments:
Overview of EAP.



Photo: 04

Date: 05/27/2021

Direction Facing:
NW

Comments:
Gate valve at inlet of culvert between EAP and Leachate Pond. Note partial obstruction with vegetation. Geosyntec recommended clearing as part of routine site maintenance.



Site Owner: Dynegy Midwest Generation, LLC

Project Number: GLP8027

CCR Unit: East Ash Pond (EAP)

Site: Hennepin Power Plant

Photo: 05

Date: 05/27/2021

Direction Facing:
W

Comments:
Outlet of culvert between EAP and Leachate Pond, on the Leachate Pond sideslopes. Note heavy vegetation growth obstructing the culvert. Geosyntec recommended clearing as part of routine site maintenance.



Photo: 06

Date: 05/27/2021

Direction Facing:
S

Comments:
Overview of the EAP dike crest.



GEOSYNTEC CONSULTANTS
Photographic Record



Site Owner: Dynegy Midwest Generation, LLC

Project Number: GLP8027

CCR Unit: East Ash Pond (EAP)

Site: Hennepin Power Plant

Photo: 07

Date: 05/27/2021

Direction Facing:
SE

Comments:
Overview of
vegetation on the
downstream slope
of the EAP dike.



Photo: 08

Date: 05/27/2021

Direction Facing:
SW

Comments:
EAP upstream dike
geomembrane
slope covering
overview



Site Owner: Dynegy Midwest Generation, LLC

Project Number: GLP8027

CCR Unit: East Ash Pond (EAP)

Site: Hennepin Power Plant

Photo: 09

Date: 05/27/2021

Direction Facing:
SE

Comments:
EAP downstream
dike vegetation
overview.



Photo: 10

Date: 05/27/2021

Direction Facing:
SW

Comments:
EAP upstream dike
geomembrane
overview and
outlet structure.



GEOSYNTEC CONSULTANTS
Photographic Record



Site Owner: Dynegy Midwest Generation, LLC

Project Number: GLP8027

CCR Unit: East Ash Pond (EAP)

Site: Hennepin Power Plant

Photo: 11

Date: 05/27/2021

Direction Facing:
W

Comments:
EAP outfall
structure catwalk



Photo: 12

Date: 05/27/2021

Direction Facing:
Down

Comments:
EAP outfall
structure stoplogs
from above



Site Owner: Dynegy Midwest Generation, LLC

Project Number: GLP8027

CCR Unit: East Ash Pond (EAP)

Site: Hennepin Power Plant

Photo: 13

Date: 05/27/2021

Direction Facing:

N

Comments:

EAP dike overview



Photo: 14

Date: 05/27/2021

Direction Facing:

W

Comments:

EAP south side overview



GEOSYNTEC CONSULTANTS
Photographic Record



Site Owner: Dynegy Midwest Generation, LLC

Project Number: GLP8027

CCR Unit: East Ash Pond (EAP)

Site: Hennepin Power Plant

Photo: 15

Date: 05/27/2021

Direction Facing:
NE

Comments:
EAP pool overview



Photo: 16

Date: 05/27/2021

Direction Facing:
NW

Comments:
EAP interior
overview



Site Owner: Dynegy Midwest Generation, LLC

Project Number: GLP8027

CCR Unit: East Ash Pond (EAP)

Site: Hennepin Power Plant

Photo: 17

Date: 05/27/2021

Direction Facing:

N

Comments:

EAP interior
overview



Photo: 18

Date: 05/27/2021

Direction Facing:

N

Comments:

West side of EAP
overview



GEOSYNTEC CONSULTANTS
Photographic Record



Site Owner: Dynegy Midwest Generation, LLC

Project Number: GLP8027

CCR Unit: East Ash Pond (EAP)

Site: Hennepin Power Plant

Photo: 19

Date: 05/27/2021

Direction Facing:
N

Comments:
West side of EAP
overview.



Photo: 20

Date: 05/27/2021

Direction Facing:
E

Comments:
EAP interior
overview



Attachment C

Periodic History of Construction Report Update Letter

October 11, 2021

Dynegy Midwest Generation, LLC
13498 E. 800th Street
Hennepin, Illinois 61327

**Subject: Periodic History of Construction Report Update Letter
USEPA Final CCR Rule, 40 CFR §257.73(c)
Hennepin Power Plant
Hennepin, Illinois**

At the request of Dynegy Midwest Generation, LLC (DMG), Geosyntec Consultants (Geosyntec) has prepared this Letter to documents updates to the Initial History of Construction (HoC) report for the Hennepin Power Plant (HPP), also known as the Hennepin Power Station (HEN). The Initial HoC report was prepared by AECOM in October of 2016 [1] in accordance with 40 Code of Federal Regulations (CFR) §257.73(c) of the United States Environmental Protection Agency (USEPA) Coal Combustion Residuals Rule, known as the CCR Rule [2]. This letter also includes information required by Section 845.220(a)(1)(B) (Design and Construction Plans) of the state-specific Illinois Environmental Protection Agency (IEPA) Part 845 CCR Rule [3] that is not expressly required by §257.73(c).

BACKGROUND

The CCR Rule required that, by October 17, 2016, Initial HoC reports to be compiled for existing CCR surface impoundments with: (1) a height of five feet or more and a storage volume of 20 acre-feet or more, or (2) a height of 20 feet or more. The Initial HoC report was required to contain, to the extent feasible, the information specified in 40 CFR §257.73(c)(1)(i)-(xii). The Initial HoC report for HPP, which included four existing CCR surface impoundments, the Old West Polishing Pond (OWPP), Old West Ash Pond (Pond No. 1 and Pond No. 3, also known as the OWAP), Ash Pond No. 2 (AP2), and the East Ash Pond (EAP), was prepared and subsequently posted to DMG's CCR Website prior to October 17, 2016.

The CCR Rule requires that Initial HoC to be updated if there is a significant change to any information compiled in the Initial HoC report, as listed below:

§ 257.73(c)(2): If there is a significant change to any information compiled under paragraph (c)(1) of this section, the owner or operator of the CCR unit must update the relevant information and place it in the facility's operating record as required by § 257.105(f)(9).

DMG retained Geosyntec to review the Initial HoC report, review reasonably and readily available information for the OWPP, OWAP, AP2, EAP generated since the Initial HoC report was prepared, and perform a site visit to HPP to evaluate if significant changes may have occurred since the Initial HoC report was prepared. This Letter contains the results of Geosyntec's evaluation and documents significant changes that have occurred at the OWPP, OWAP, AP2, and EAP, as they pertain the requirements of §257.73(c)(1)(i)-(xii)

UPDATES TO HISTORY OF CONSTRUCTION REPORT

Geosyntec's evaluation for the HPP OWPP, OWAP, AP2, and EAP determined that no known significant changes requiring updates to the information in the Initial HoC report pertaining to §257.73(c)(1)(ii), (iv), (v), (vi), (vii), (xi), and (xii) of the CCR Rule had occurred since the Initial HoC report was developed.

However, Geosyntec's evaluation determined that significant changes at the HPP EAP pertaining to §257.73(c)(1)(i), (iii), (viii), (ix), and (x) of the CCR Rule had occurred since the Initial HoC report had been developed. Additionally, information how long the CCR EAP and been operating and the types of CCR in the impoundment, as required by Section 845.220(a)(1)(B) of the Part 845 Rule were not included in the Initial HoC report, as this information is not required by the CCR Rule. Each change and the subsequent updates to the Initial HoC report is described within this section.

Section 845.220(a)(1)(B): A statement of ... how long the CCR surface impoundment has been in operation, and the types of CCR that have been placed in the surface impoundment.

East Ash Pond

The EAP was in operation from 1996 until the HPP was retired in December of 2019, for a total of approximately 23 years [1]. Since December of 2019 the EAP has not been actively receiving CCR but has not yet been closed. As of the date of this report, the EAP has been present for approximately 25 years.

CCR placed in the EAP has included bottom ash and fly ash, in addition to other non-CCR waste streams [1].

Old West Polishing Pond and Old West Ash Pond

The OWAP and OWPP were in operation from 1952 to approximately 1996, for a total of approximately 44 years. The OWAP and OWPP did not receive CCR after 1996 but was not closed until 2020. The OWAP and OWPP were present for a total of approximately 68 years prior to closure.

CCR placed in the OWAP and OWPP included fly ash and bottom ash.

Ash Pond No. 2

AP2 was in operation from 1958 until sometime between 2003 and 2009, for a total of approximately 45 to 51 years. AP2 did not receive CCR after sometime between 2003 and 2009, but was not closed until 2020. AP2 was present for a total of approximately 62 years.

CCR placed in AP2 included fly ash and bottom ash.

§ 257.73(c)(1)(i): The name and address of the person(s) owning or operating the CCR unit; the name associated with the CCR unit; and the identification number of the CCR unit if one has been assigned by the state.

State identification numbers (IDs) for the OWPP, OWAP, AP2, and EAP have been assigned by the Illinois Environmental Protection Agency (IEPA). Each ID is listed in **Table 1**.

Table 1 – Results of Updated Discharge Capacity Calculations

CCR Surface Impoundment	State ID
Old West Polishing Pond (OWPP)	W1550100002-01
Old West Ash Pond (OWAP)	W1550100002-03
Ash Pond No. 2 (AP2)	W1550100002-04
East Ash Pond (EAP)	W1550100002-05

§ 257.73(c)(1)(iii): A statement of the purpose for which the CCR unit is being used.

The OWPP, OWAP, and EAP2 were closed in 2020, in substantial compliance with the written closure plans posted to DMG’s CCR Website ([4], [5], [6]), and as documented by certified Notification of Completion of Closures posted to DMG’s CCR Website ([7], [8]). Therefore, the OWAP and EAP2 are no longer capable of storing additional CCR or free liquids, and all CCR was removed from the OWPP as part of closure-by-removal.

The HPP was retired in December of 2019, with the generation of electricity ceased at that time. Therefore, the EAP is no longer being used to actively store and dispose of new CCR, as CCR is no longer being generated by the HPP. The EAP also received inflows from East

Ash Pond No. 2 and the Coal Pile Runoff Pond; these inflows have also ceased as part of plant closure.

§ 257.73(c)(1)(viii): *A description of the type, purpose, and location of existing instrumentation.*

Instrumentation monitoring at the OWPP, OWAP, and EAP is no longer required as these CCR surface impoundments were closed in accordance with §257.102 ([7], [8]), and the instrumentation network was modified at that time. Therefore, the instrumentation locations shown in Appendix C of the Initial HoC report are no longer applicable to the OWPP, OWAP, and EAP.

§ 257.73(c)(1)(ix): *Area-capacity curves for the CCR unit.*

An updated area-capacity curve was prepared for the EAP in 2021 and is provided in **Figure 1**.

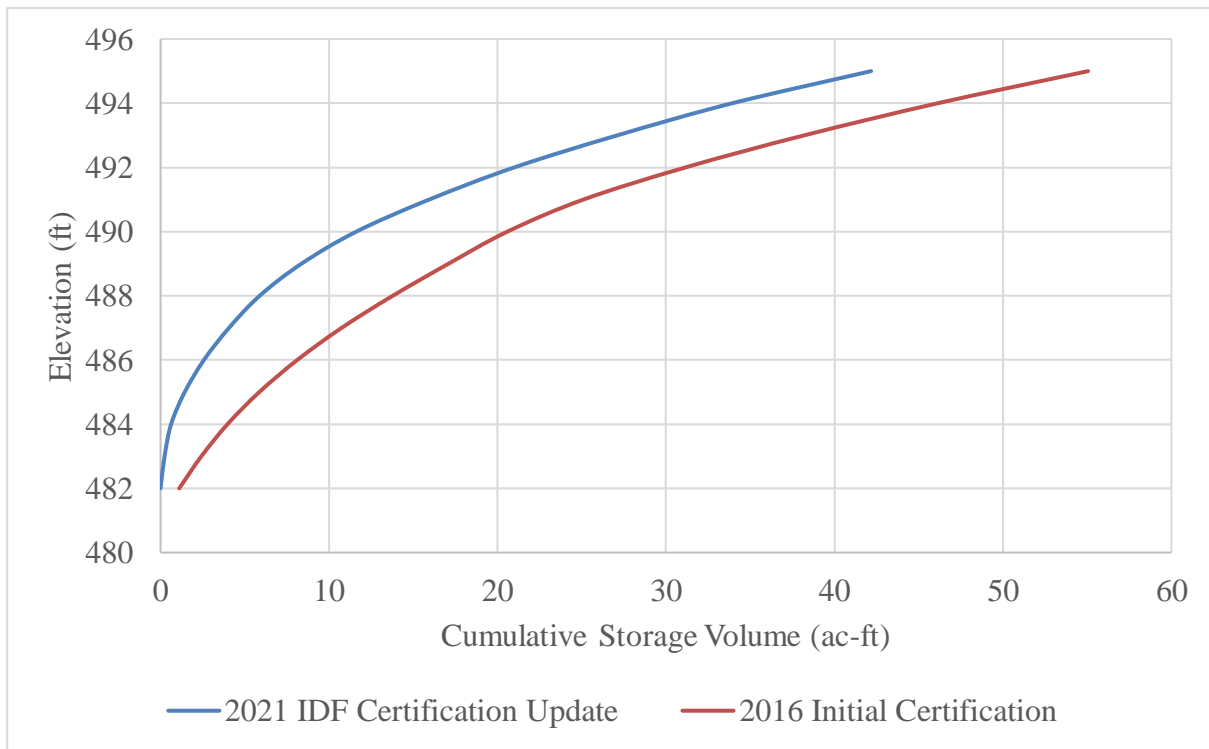


Figure 1 – Area-Capacity Curve for East Ash Pond

§ 257.73(c)(1)(x): A description of each spillway and diversion design features and capacities and calculations used in their determination.

Updated discharge capacity calculations for the existing spillways of the EAP were prepared in 2021 using HydroCAD 10 modeling software. The calculations indicate that the EAP has sufficient storage capacity and will not overtop the embankments during the 1,000-year, 24-hour, storm event. The results of the calculations are provided in **Table 2**.

Table 2 – Results of Updated Discharge Capacity Calculations

	East Ash Pond
Approximate Berm Minimum Elevation ¹ , ft	492.0
Approximate Emergency Spillway Elevation ¹ , ft	Not Applicable
Starting Water Surface Elevation ¹ (SWSE), ft	490.0
Peak Water Surface Elevation ¹ (PWSE), ft	491.4
Time to Peak, hr	16.8
Surface Area ² , ac	5.0
Storage ³ , ac-ft	6.3

Notes:

¹Elevations are based on the NAVD88 datum

²Surface area is defined as the water surface area at the PWSE

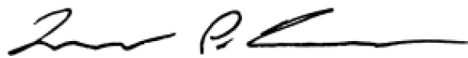
³Storage is defined as the volume between the SWSE and PWSE

The OWPP, OWAP, and EAP2 no longer retain free water as both CCR surface impoundments were closed in 2020 ([7], [8]). Therefore, the spillways are no longer present and the information regarding the spillways of these structures, as presented in the Initial HoC report, is no longer applicable to the OWPP, OWAP, and EAP2.

CLOSING

This letter has been prepared to document Geosyntec’s evaluation of changes that have occurred at the OWPP, OWAP, AP2, and EAP at the HPP since the Initial HoC was developed, based on reasonably and readily available information provided by DMG, observed by Geosyntec during the site visit, or generated by Geosyntec as part of subsequent calculations.

Sincerely,



Lucas P. Carr, P.E.
Senior Engineer



John Seymour, P.E.
Senior Principal

REFERENCES






- [1] AECOM, "History of Construction, USEPA Final CCR Rule, 40 CFR § 257.73(c), Hennepin Power Station, Hennepin, Illinois," October 2016.
- [2] United States Environmental Protection Agency, "40 CFR Parts 257 and 261, Hazardous and Solid Waste Management System, Disposal of Coal Combustion Residuals from Electric Utilities, Final Rule, 2015," 2015.
- [3] Illinois Environmental Protection Agency, "35 Ill. Adm. Code Part 845, Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments," Springfield, IL, 2021.
- [4] V. Modeer, "Closure Plan for Existing CCR Surface Impoundment, 40 CFR 257.102(b), Hennepin Power Station, Dynegy Midwest Generation, LLC, Old West Polishing Pond," October 17, 2016.
- [5] V. Modeer, "Closure Plan for Existing CCR Surface Impoundment, 40 CFR 257.102(b), Hennepin Power Station, Dynegy Midwest Generation, LLC, Old West Ash Pond," December 17, 2020.
- [6] V. Modeer, "Closure Plan for Existing CCR Surface Impoundment, 40 CFR 257.102(b), Hennepin Power Station, Dynegy Midwest Generation, LLC, East Ash Pond," October 17, 2016.
- [7] D. Tickner, "Hennepin Power Station; Old West Polishing Pond, Notification of Completion of Closure," Luminant, December 17, 2020.
- [8] D. Tickner, "Hennepin Power Station; Old West Ash Pond, Ash Pond No. 2, Notification of Completion of Closure," Luminant, December 17, 2020.

Attachment D

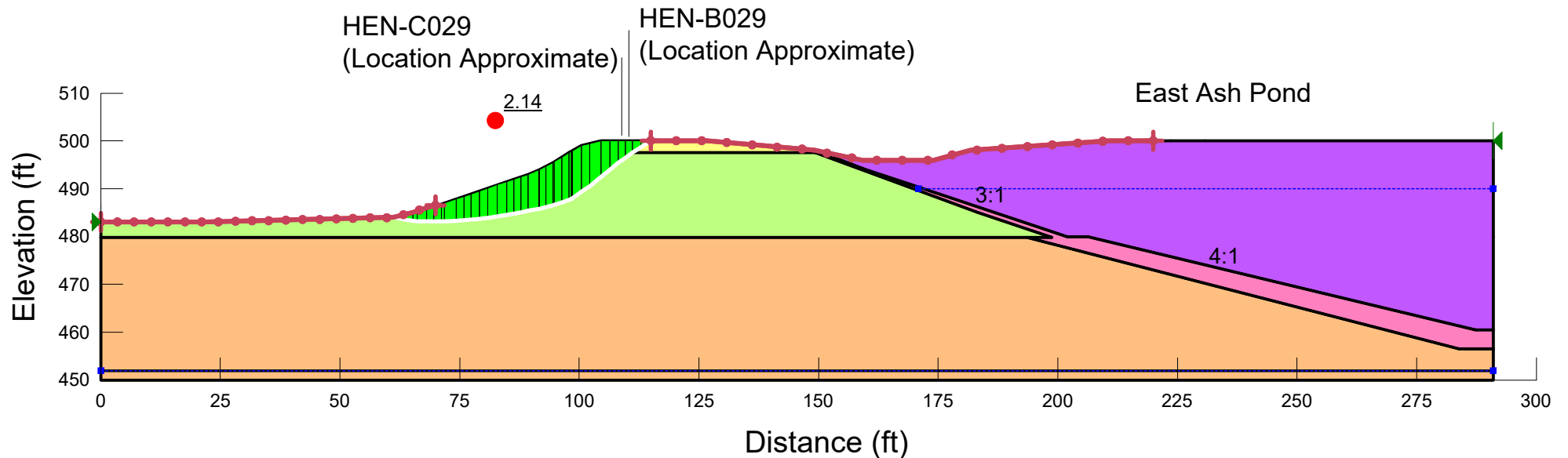
Periodic Structural Stability and Safety Factor Assessment Analyses

Calculated By: ZJF Date:9-21-2016
 Modified By: PK Date: 8-31-2021
 Checked By: PB Date:9-01-2021

Hennepin East Ash Pond
 Cross Section SL-10
 Effective (Drained)-Static Normal Pool

Materials	
	Road Fill
	Alluvial Foundation
	Liner System (Drained)
	Fly Ash (Drained)
	Embankment Fill (Drained)

Name: Road Fill Unit Weight: 130 pcf Cohesion': 0 psf Phi': 38 ° Piezometric Line: 1
 Name: Alluvial Foundation Unit Weight: 135 pcf Cohesion': 0 psf Phi': 38 ° Piezometric Line: 1
 Name: Liner System (Drained) Unit Weight: 120 pcf Cohesion': 60 psf Phi': 30 ° Piezometric Line: 2
 Name: Fly Ash (Drained) Unit Weight: 105 pcf Cohesion': 100 psf Phi': 27 ° Piezometric Line: 2
 Name: Embankment Fill (Drained) Unit Weight: 105 pcf Cohesion': 30 psf Phi': 32 ° Piezometric Line: 1

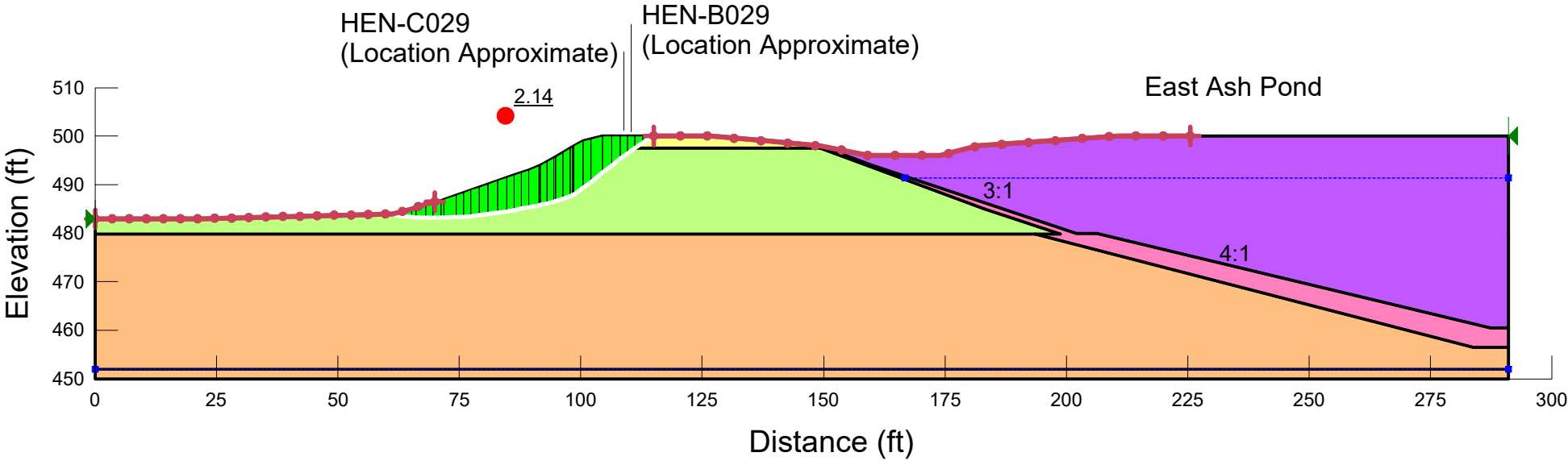


Hennepin East Ash Pond
 Cross Section SL-10
 Effective (Drained) - Static Max Pool

Calculated By: ZJF Date:9-21-2016
 Modified By: PK Date: 8-31-2021
 Checked By: PB Date:9-01-2021






- Materials**
- Road Fill
 - Alluvial Foundation
 - Liner System (Drained)
 - Fly Ash (Drained)
 - Embankment Fill (Drained)

Name: Road Fill Unit Weight: 130 pcf Cohesion: 0 psf Phi: 38 ° Piezometric Line: 1
 Name: Alluvial Foundation Unit Weight: 135 pcf Cohesion: 0 psf Phi: 38 ° Piezometric Line: 1
 Name: Liner System (Drained) Unit Weight: 120 pcf Cohesion: 60 psf Phi: 30 ° Piezometric Line: 2
 Name: Fly Ash (Drained) Unit Weight: 105 pcf Cohesion: 100 psf Phi: 27 ° Piezometric Line: 2
 Name: Embankment Fill (Drained) Unit Weight: 105 pcf Cohesion: 30 psf Phi: 32 ° Piezometric Line: 1

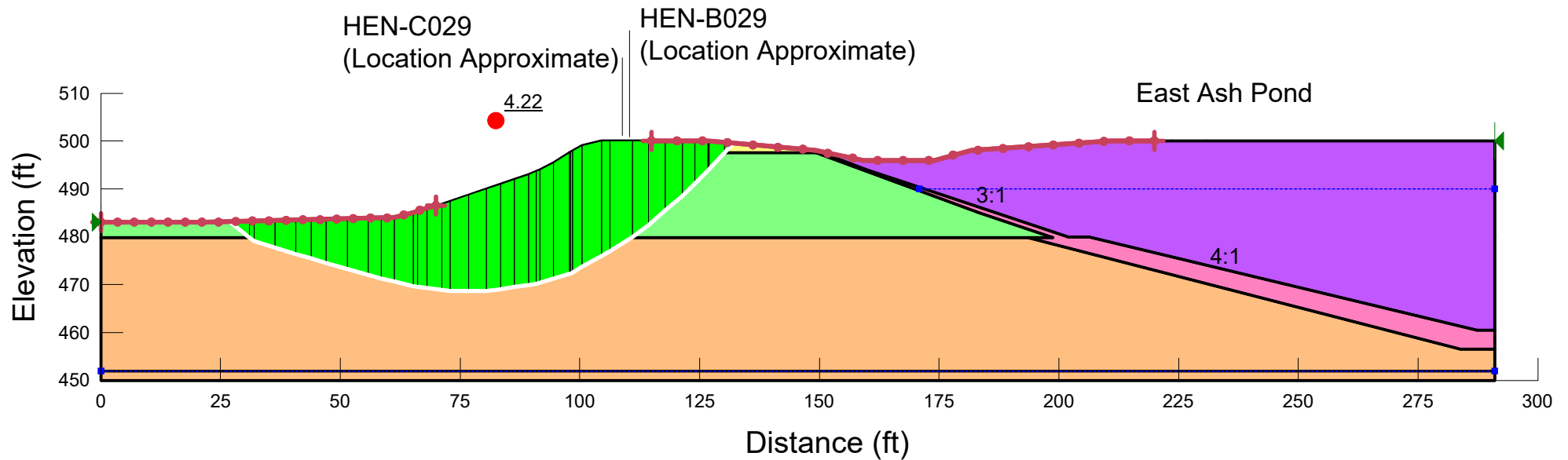


Hennepin East Ash Pond
 Cross Section SL-10
 Total (Undrained) - Pseudostatic

Horz Seismic Coef.: 0.119

Materials	
	Road Fill
	Alluvial Foundation
	Liner System (Undrained)
	Fly Ash (Undrained)
	Embankment Fill (Undrained)

Name: Road Fill	Unit Weight: 130 pcf	Cohesion': 0 psf	Phi': 38 °	Piezometric Line: 1
Name: Alluvial Foundation	Unit Weight: 135 pcf	Cohesion': 0 psf	Phi': 38 °	Piezometric Line: 1
Name: Liner System (Undrained)	Unit Weight: 120 pcf	Cohesion': 2,500 psf	Phi': 0 °	Piezometric Line: 2
Name: Fly Ash (Undrained)	Unit Weight: 105 pcf	Cohesion': 600 psf	Phi': 0 °	Piezometric Line: 2
Name: Embankment Fill (Undrained)	Unit Weight: 105 pcf	Cohesion': 2,500 psf	Phi': 0 °	Piezometric Line: 1

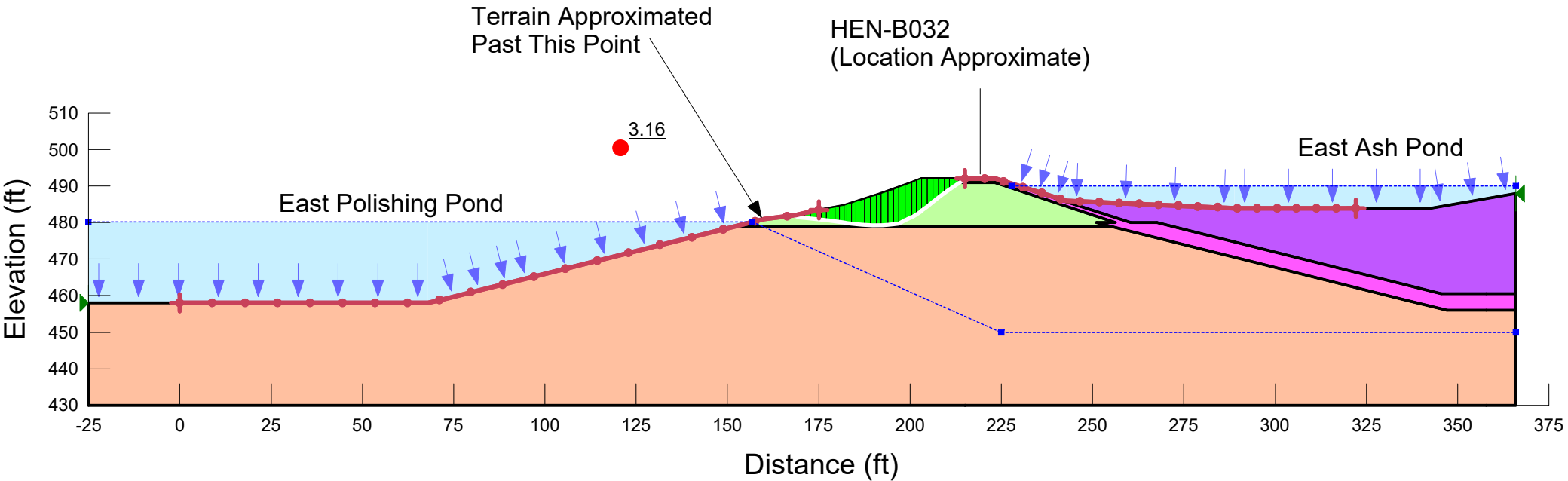


East Ash Pond
 Cross Section SL-12
 Effective (Drained) - Static Normal Pool

Calculated By: ZJF Date: 9/21/16
 Modified By: PK Date: 8/31/21
 Checked By: PB Date: 9/01/21

- Materials**
- Road Fill
 - Alluvial Foundation
 - Fly Ash (Drained)
 - Liner System (Drained)
 - Embankment Fill (Drained)

Name: Road Fill Unit Weight: 130 pcf Cohesion': 0 psf Phi': 38 ° Piezometric Line: 2
 Name: Alluvial Foundation Unit Weight: 135 pcf Cohesion': 0 psf Phi': 38 ° Piezometric Line: 2
 Name: Fly Ash (Drained) Unit Weight: 105 pcf Cohesion': 100 psf Phi': 27 ° Piezometric Line: 1
 Name: Liner System (Drained) Unit Weight: 120 pcf Cohesion': 60 psf Phi': 30 ° Piezometric Line: 1
 Name: Embankment Fill (Drained) Unit Weight: 105 pcf Cohesion': 30 psf Phi': 32 ° Piezometric Line: 2

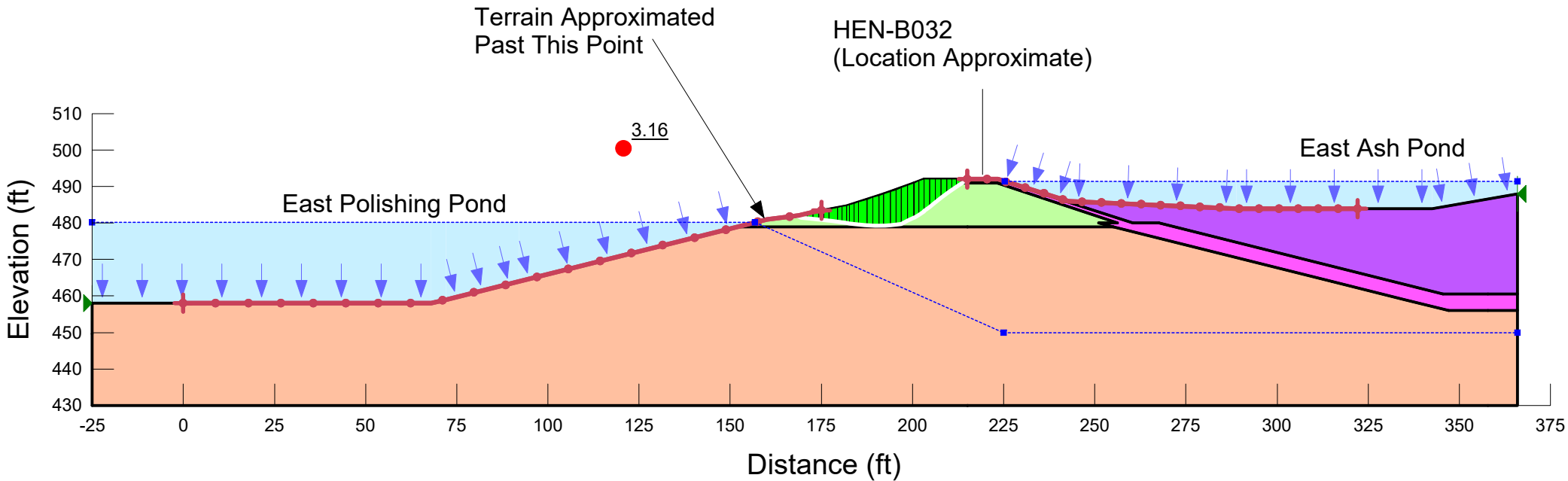


East Ash Pond
 Cross Section SL-12
 Effective (Drained) - Static Max Pool

Calculated By: ZJF Date: 9/21/16
 Modified By: PK Date: 8/31/21
 Checked By: PB Date: 9/01/21

- Materials**
- Road Fill
 - Alluvial Foundation
 - Fly Ash (Drained)
 - Liner System (Drained)
 - Embankment Fill (Drained)

Name: Road Fill Unit Weight: 130 pcf Cohesion': 0 psf Phi': 38 ° Piezometric Line: 2
 Name: Alluvial Foundation Unit Weight: 135 pcf Cohesion': 0 psf Phi': 38 ° Piezometric Line: 2
 Name: Fly Ash (Drained) Unit Weight: 105 pcf Cohesion': 100 psf Phi': 27 ° Piezometric Line: 1
 Name: Liner System (Drained) Unit Weight: 120 pcf Cohesion': 60 psf Phi': 30 ° Piezometric Line: 1
 Name: Embankment Fill (Drained) Unit Weight: 105 pcf Cohesion': 30 psf Phi': 32 ° Piezometric Line: 2



East Ash Pond Cross Section SL-12 Total (Undrained) - Pseudostatic

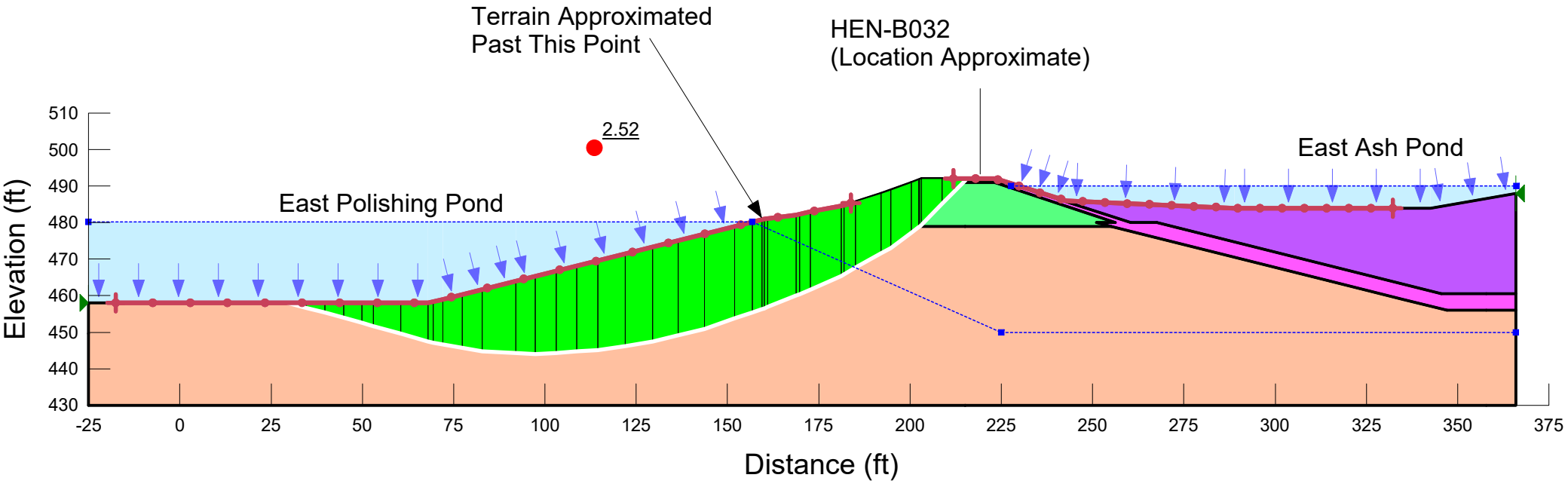
Calculated By: ZJF Date: 9/21/16
 Modified By: PK Date: 8/31/21
 Checked By: PB Date: 9/01/21

Horz Seismic Coef.: 0.119

Materials

- Road Fill
- Alluvial Foundation
- Liner System (Undrained)
- Fly Ash (Undrained)
- Embankment Fill (Undrained)

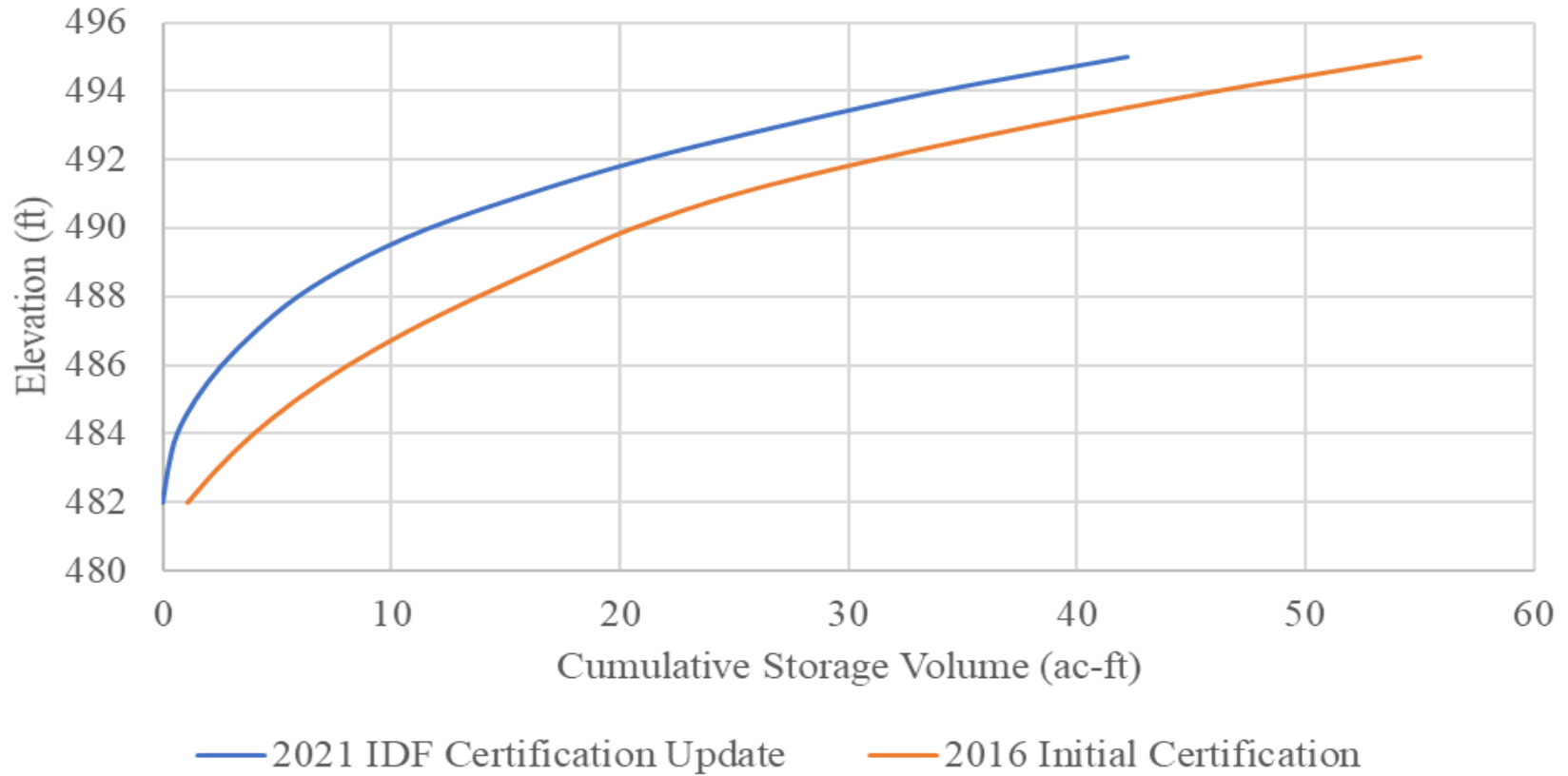
Name: Road Fill Unit Weight: 130 pcf Cohesion': 0 psf Phi': 38 ° Piezometric Line: 2
 Name: Alluvial Foundation Unit Weight: 135 pcf Cohesion': 0 psf Phi': 38 ° Piezometric Line: 2
 Name: Liner System (Undrained) Unit Weight: 120 pcf Cohesion': 2,500 psf Phi': 0 ° Piezometric Line: 1
 Name: Fly Ash (Undrained) Unit Weight: 105 pcf Cohesion': 600 psf Phi': 0 ° Piezometric Line: 1
 Name: Embankment Fill (Undrained) Unit Weight: 105 pcf Cohesion': 2,500 psf Phi': 0 ° Piezometric Line: 2



Attachment E

Periodic Inflow Design Flood Control System Plan Analyses

East Ash Pond - Cumulative Storage



EAST ASH POND - CUMULATIVE STORAGE
PERIODIC CERTIFICATION
HENNEPIN POWER PLANT
HENNEPIN, ILLINOIS

Geosyntec
consultants

Figure

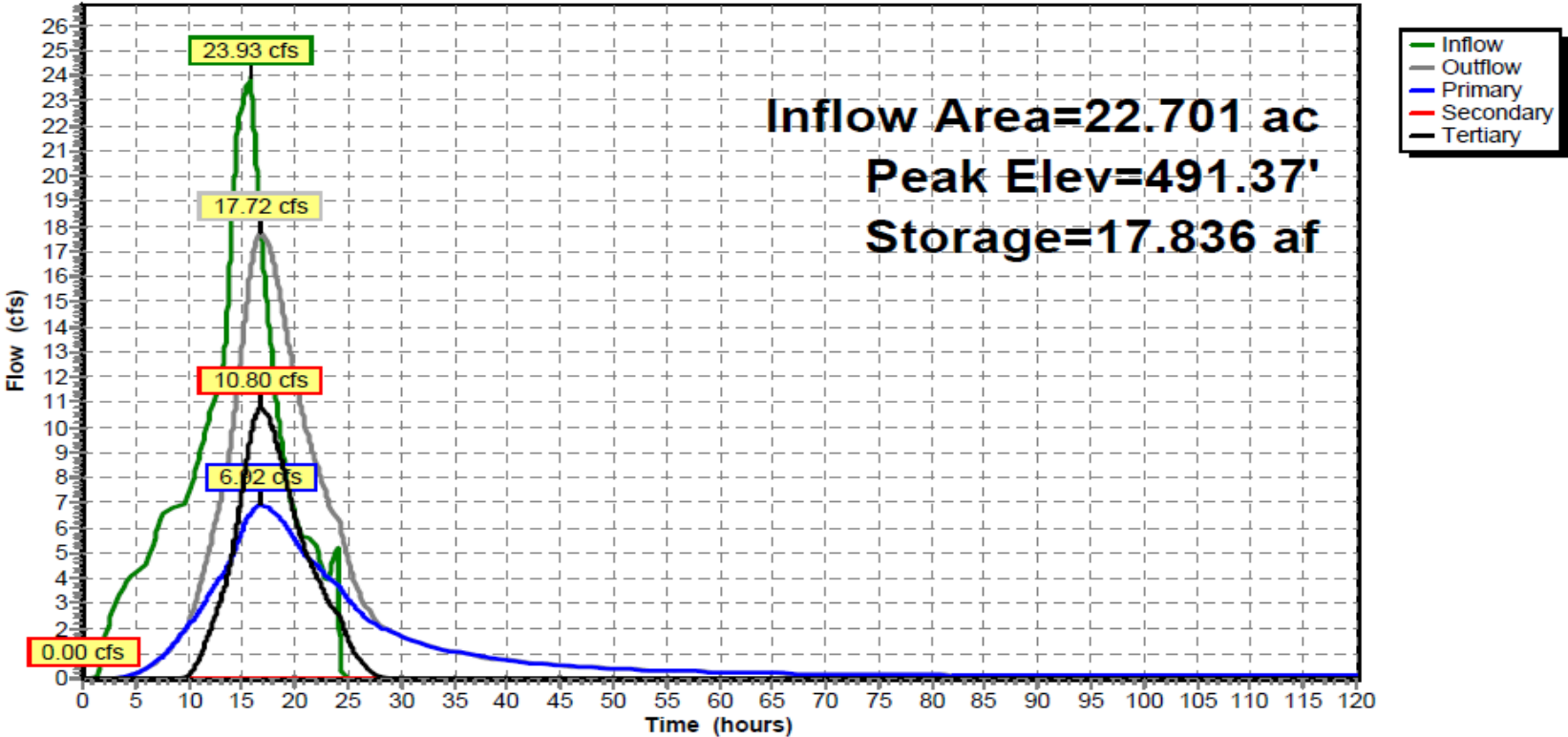
E-1

GLP8027

8/30/2021

Pond EAP: East Ash Pond

Hydrograph



EAST ASH POND IDF HYDROGRAPH PERIODIC CERTIFICATION HENNEPIN POWER PLANT HENNEPIN, ILLINOIS	
Geosyntec consultants	Figure
GLP8027	8/30/2021
	E-2

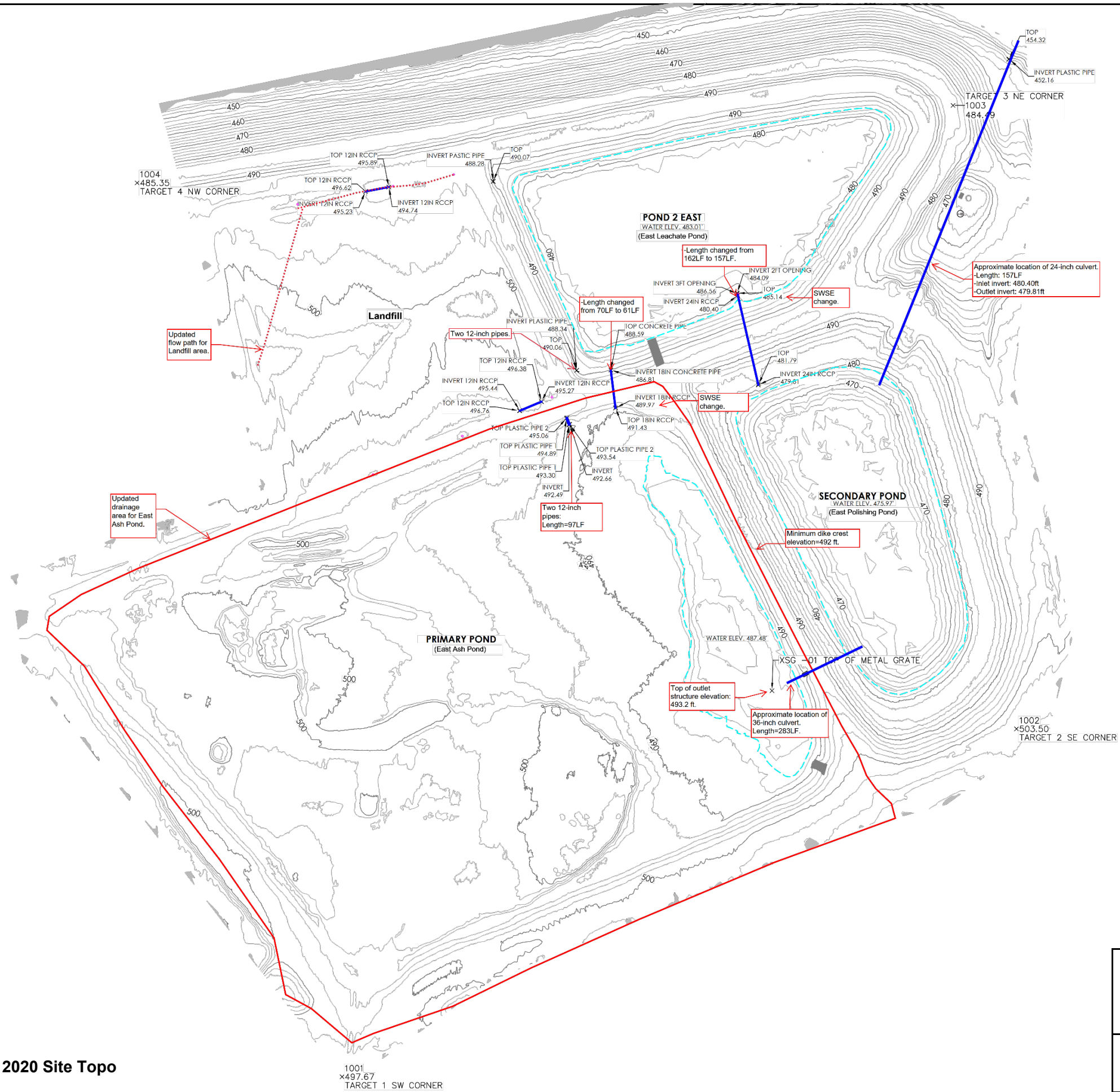
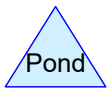
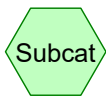
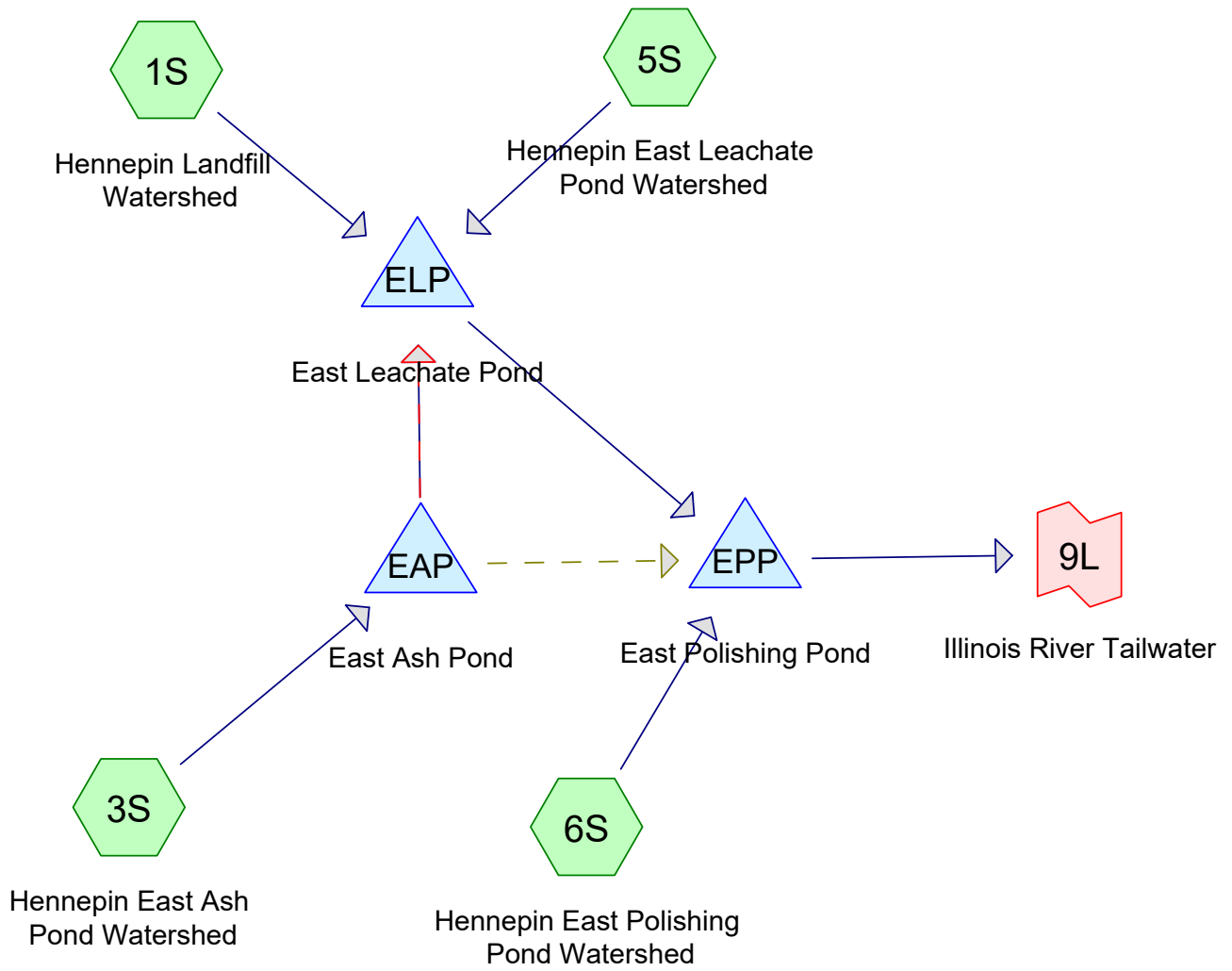


Figure based on IngenAE 2020 Site Topo

Hennepin Power Station East Ash Pond Hydrologic Workmap		
		Figure E-3
GLP8027	August 2021	



Routing Diagram for 20210824 Hennepin H&H Periodic Review
 Prepared by SCCM, Printed 9/1/2021
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20210824_Hennepin_H&H_Periodic Review

Prepared by SCCM

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Page 2

Area Listing (all nodes)

Area (acres)	CN	Description (subcatchment-numbers)
0.734	84	50-75% Grass cover, Fair, HSG D (5S)
5.253	89	<50% Grass cover, Poor, HSG D (1S)
7.197	80	>75% Grass cover, Good, HSG D (3S, 6S)
2.159	96	Gravel Surface, HSG D (3S, 5S, 6S)
1.065	96	Gravel surface, HSG D (1S)
17.485	93	Urban industrial, 72% imp, HSG D (3S, 6S)
10.112	98	Water Surface, HSG D (3S, 5S, 6S)
44.005	92	TOTAL AREA

20210824_Hennepin_H&H_Periodic Review

Prepared by SCCM

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Page 3

Soil Listing (all nodes)

Area (acres)	Soil Group	Subcatchment Numbers
0.000	HSG A	
0.000	HSG B	
0.000	HSG C	
44.005	HSG D	1S, 3S, 5S, 6S
0.000	Other	
44.005		TOTAL AREA

20210824_Hennepin_H&H_Periodic Review

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Page 4

Ground Covers (all nodes)

HSG-A (acres)	HSG-B (acres)	HSG-C (acres)	HSG-D (acres)	Other (acres)	Total (acres)	Ground Cover	Subcatchment Numbers
0.000	0.000	0.000	0.734	0.000	0.734	50-75% Grass cover, Fair	5S
0.000	0.000	0.000	5.253	0.000	5.253	<50% Grass cover, Poor	1S
0.000	0.000	0.000	7.197	0.000	7.197	>75% Grass cover, Good	3S, 6S
0.000	0.000	0.000	2.159	0.000	2.159	Gravel Surface	3S, 5S, 6S
0.000	0.000	0.000	1.065	0.000	1.065	Gravel surface	1S
0.000	0.000	0.000	17.485	0.000	17.485	Urban industrial, 72% imp	3S, 6S
0.000	0.000	0.000	10.112	0.000	10.112	Water Surface	3S, 5S, 6S
0.000	0.000	0.000	44.005	0.000	44.005	TOTAL AREA	

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Prepared by SCCM

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Page 5

Pipe Listing (all nodes)

Line#	Node Number	In-Invert (feet)	Out-Invert (feet)	Length (feet)	Slope (ft/ft)	n	Diam/Width (inches)	Height (inches)	Inside-Fill (inches)
1	1S	0.00	0.00	71.0	0.0210	0.010	24.0	0.0	0.0
2	EAP	489.97	486.81	61.0	0.0518	0.012	18.0	0.0	0.0
3	EAP	458.00	457.50	283.0	0.0018	0.012	36.0	0.0	0.0
4	EAP	492.66	488.34	97.0	0.0445	0.010	12.0	0.0	0.0
5	ELP	480.40	479.81	157.0	0.0038	0.012	24.0	0.0	0.0
6	EPP	458.00	452.16	655.0	0.0089	0.015	36.0	0.0	0.0

Time span=0.00-120.00 hrs, dt=0.01 hrs, 12001 points
 Runoff by SCS TR-20 method, UH=SCS, Weighted-CN
 Reach routing by Dyn-Stor-Ind method - Pond routing by Dyn-Stor-Ind method

Subcatchment 1S: Hennepin Landfill Runoff Area=6.318 ac 0.00% Impervious Runoff Depth=8.50"
 Flow Length=644' Tc=13.6 min CN=90 Runoff=6.60 cfs 4.477 af

Subcatchment 3S: Hennepin East Ash Runoff Area=22.701 ac 59.67% Impervious Runoff Depth=8.75"
 Flow Length=817' Tc=12.3 min CN=92 Runoff=23.93 cfs 16.551 af

Subcatchment 5S: Hennepin East Leachate Runoff Area=6.183 ac 85.38% Impervious Runoff Depth=9.24"
 Flow Length=86' Slope=0.1100 '/' Tc=6.0 min CN=96 Runoff=6.62 cfs 4.760 af

Subcatchment 6S: Hennepin East Polishing Runoff Area=8.803 ac 44.04% Impervious Runoff Depth=8.50"
 Flow Length=361' Tc=6.0 min CN=90 Runoff=9.23 cfs 6.238 af

Pond EAP: East Ash Pond Peak Elev=491.37' Storage=17.836 af Inflow=23.93 cfs 16.551 af
 Primary=6.92 cfs 9.491 af Secondary=0.00 cfs 0.000 af Tertiary=10.80 cfs 6.695 af Outflow=17.72 cfs 16.187 af

Pond ELP: East Leachate Pond Peak Elev=485.57' Storage=15.349 af Inflow=19.69 cfs 18.728 af
 Outflow=18.24 cfs 18.690 af

Pond EPP: East Polishing Pond Peak Elev=481.81' Storage=50.339 af Inflow=36.66 cfs 31.623 af
 Outflow=31.35 cfs 31.533 af

Link 9L: Illinois River Tailwater Inflow=31.35 cfs 31.533 af
 Primary=31.35 cfs 31.533 af

Total Runoff Area = 44.005 ac Runoff Volume = 32.025 af Average Runoff Depth = 8.73"
48.41% Pervious = 21.304 ac 51.59% Impervious = 22.701 ac

Summary for Subcatchment 1S: Hennepin Landfill Watershed

Runoff = 6.60 cfs @ 15.73 hrs, Volume= 4.477 af, Depth= 8.50"

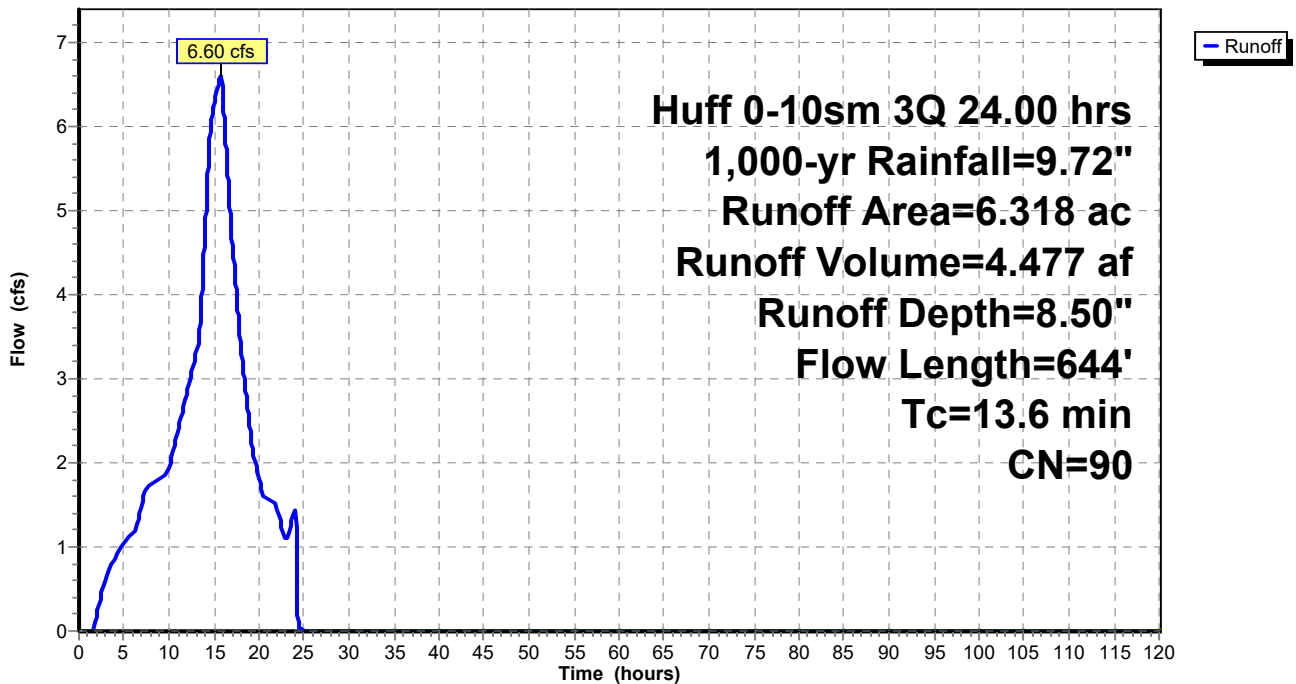
Runoff by SCS TR-20 method, UH=SCS, Weighted-CN, Time Span= 0.00-120.00 hrs, dt= 0.01 hrs
 Huff 0-10sm 3Q 24.00 hrs 1,000-yr Rainfall=9.72"

Area (ac)	CN	Description
* 1.065	96	Gravel surface, HSG D
5.253	89	<50% Grass cover, Poor, HSG D
6.318	90	Weighted Average
6.318		100.00% Pervious Area

Tc (min)	Length (feet)	Slope (ft/ft)	Velocity (ft/sec)	Capacity (cfs)	Description
8.2	100	0.0350	0.20		Sheet Flow, Grass: Short n= 0.150 P2= 2.90"
2.4	189	0.0350	1.31		Shallow Concentrated Flow, Short Grass Pasture Kv= 7.0 fps
2.9	284	0.0100	1.61		Shallow Concentrated Flow, Unpaved Kv= 16.1 fps
0.1	71	0.0210	13.57	42.62	Pipe Channel, 24.0" Round Area= 3.1 sf Perim= 6.3' r= 0.50' n= 0.010
13.6	644	Total			

Subcatchment 1S: Hennepin Landfill Watershed

Hydrograph



Summary for Subcatchment 3S: Hennepin East Ash Pond Watershed

Runoff = 23.93 cfs @ 15.73 hrs, Volume= 16.551 af, Depth= 8.75"

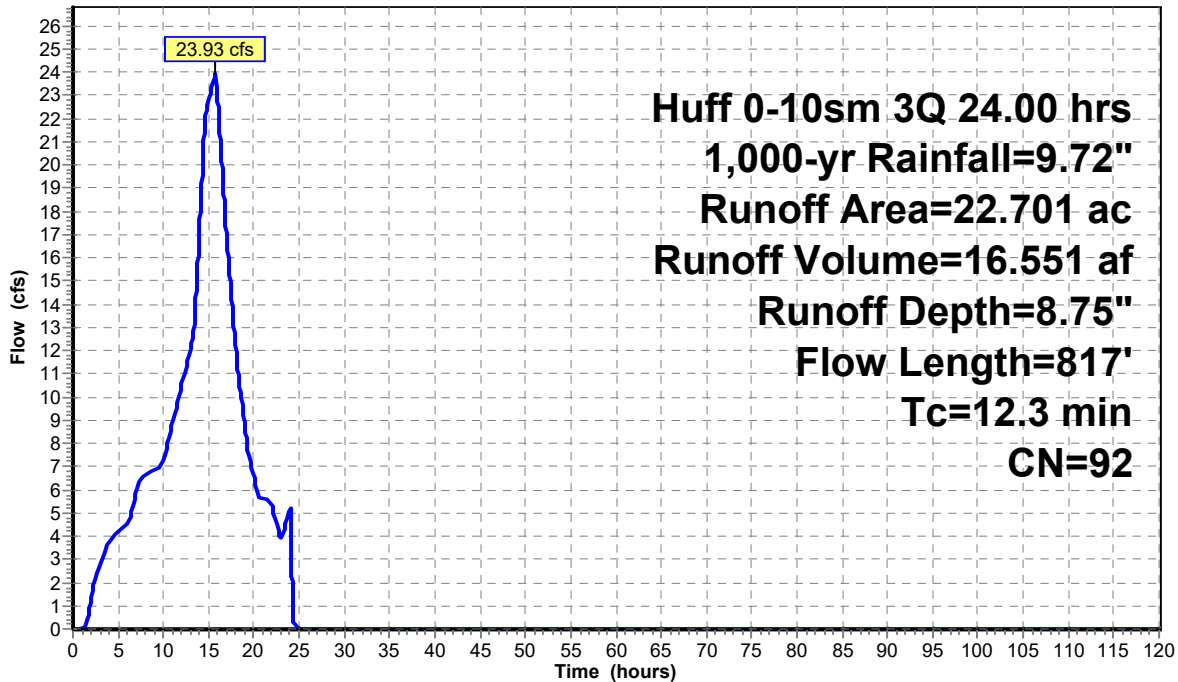
Runoff by SCS TR-20 method, UH=SCS, Weighted-CN, Time Span= 0.00-120.00 hrs, dt= 0.01 hrs
 Huff 0-10sm 3Q 24.00 hrs 1,000-yr Rainfall=9.72"

Area (ac)	CN	Description
* 1.517	98	Water Surface, HSG D
* 1.120	96	Gravel Surface, HSG D
3.358	80	>75% Grass cover, Good, HSG D
16.706	93	Urban industrial, 72% imp, HSG D
22.701	92	Weighted Average
9.156		40.33% Pervious Area
13.545		59.67% Impervious Area

Tc (min)	Length (feet)	Slope (ft/ft)	Velocity (ft/sec)	Capacity (cfs)	Description
3.4	100	0.0350	0.49		Sheet Flow, Fallow n= 0.050 P2= 2.90"
8.9	717	0.0070	1.35		Shallow Concentrated Flow, Unpaved Kv= 16.1 fps
12.3	817	Total			

Subcatchment 3S: Hennepin East Ash Pond Watershed

Hydrograph



Summary for Subcatchment 5S: Hennepin East Leachate Pond Watershed

Runoff = 6.62 cfs @ 15.66 hrs, Volume= 4.760 af, Depth= 9.24"

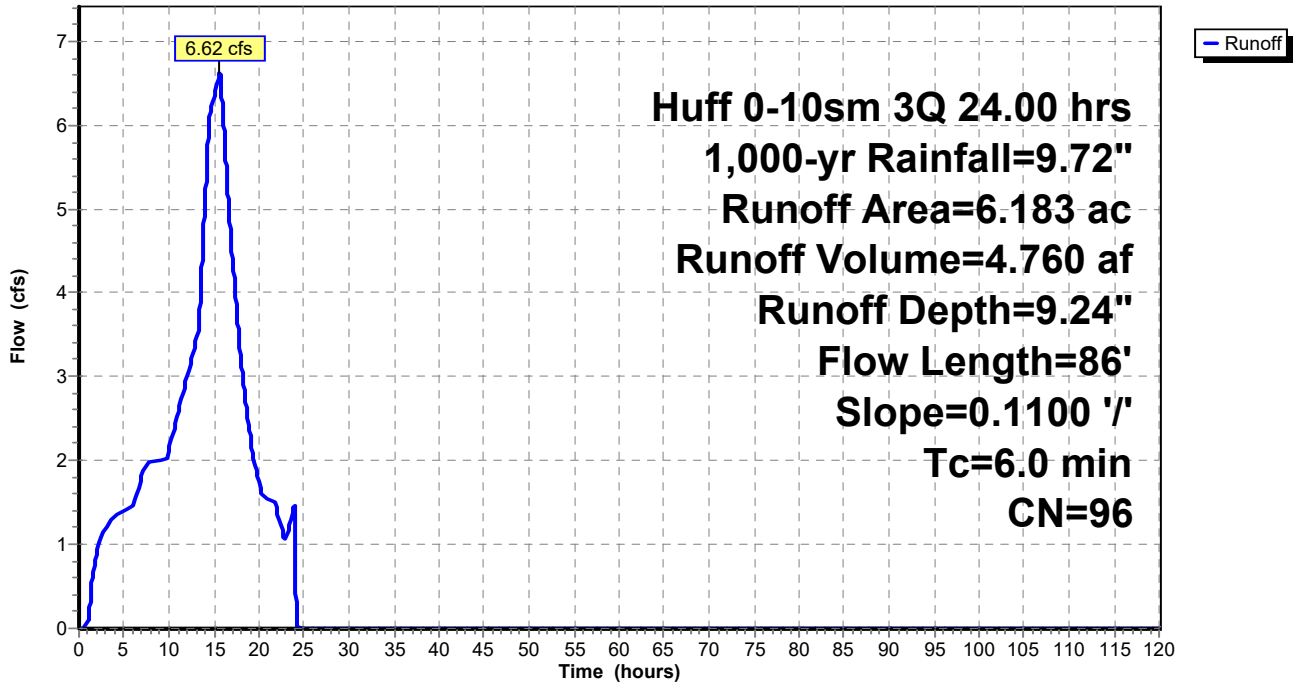
Runoff by SCS TR-20 method, UH=SCS, Weighted-CN, Time Span= 0.00-120.00 hrs, dt= 0.01 hrs
 Huff 0-10sm 3Q 24.00 hrs 1,000-yr Rainfall=9.72"

Area (ac)	CN	Description
* 5.279	98	Water Surface, HSG D
* 0.170	96	Gravel Surface, HSG D
0.734	84	50-75% Grass cover, Fair, HSG D
6.183	96	Weighted Average
0.904		14.62% Pervious Area
5.279		85.38% Impervious Area

Tc (min)	Length (feet)	Slope (ft/ft)	Velocity (ft/sec)	Capacity (cfs)	Description
4.6	86	0.1100	0.31		Sheet Flow, Grass: Short n= 0.150 P2= 2.90"
4.6	86	Total, Increased to minimum Tc = 6.0 min			

Subcatchment 5S: Hennepin East Leachate Pond Watershed

Hydrograph



Summary for Subcatchment 6S: Hennepin East Polishing Pond Watershed

Runoff = 9.23 cfs @ 15.66 hrs, Volume= 6.238 af, Depth= 8.50"

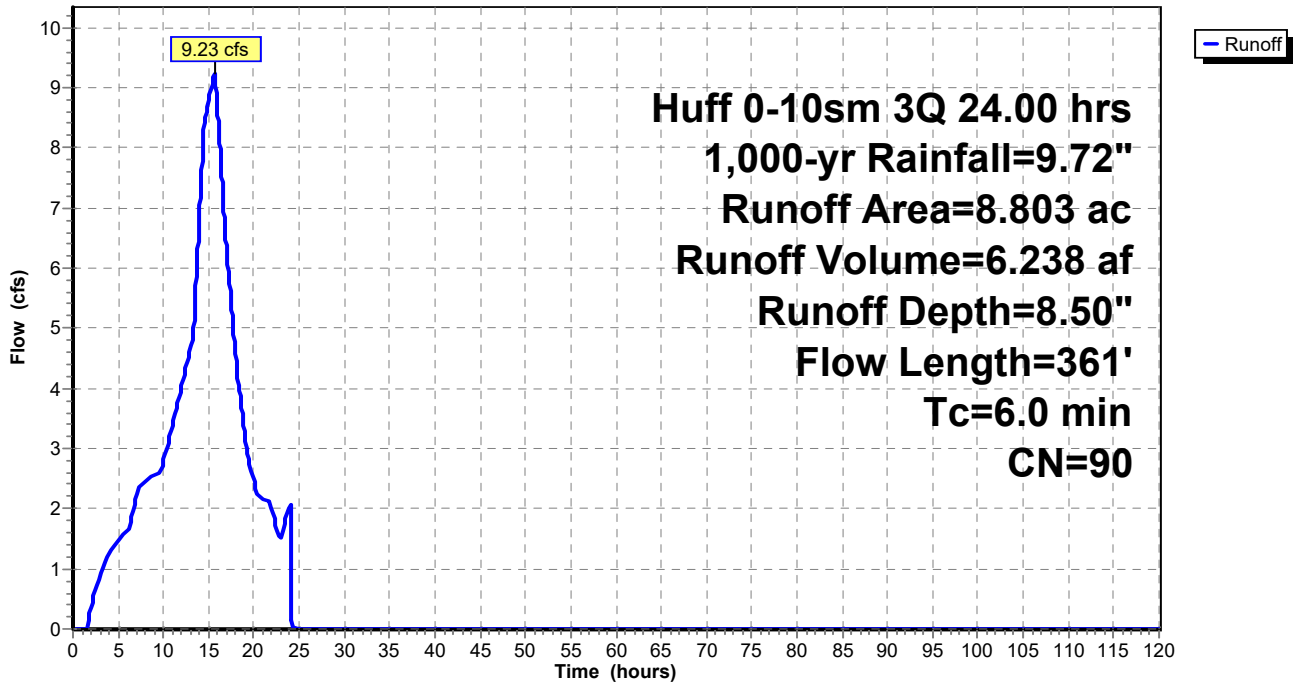
Runoff by SCS TR-20 method, UH=SCS, Weighted-CN, Time Span= 0.00-120.00 hrs, dt= 0.01 hrs
 Huff 0-10sm 3Q 24.00 hrs 1,000-yr Rainfall=9.72"

Area (ac)	CN	Description
* 3.316	98	Water Surface, HSG D
* 0.869	96	Gravel Surface, HSG D
3.839	80	>75% Grass cover, Good, HSG D
0.779	93	Urban industrial, 72% imp, HSG D
8.803	90	Weighted Average
4.926		55.96% Pervious Area
3.877		44.04% Impervious Area

Tc (min)	Length (feet)	Slope (ft/ft)	Velocity (ft/sec)	Capacity (cfs)	Description
3.2	100	0.0400	0.51		Sheet Flow, Fallow n= 0.050 P2= 2.90"
2.1	261	0.0840	2.03		Shallow Concentrated Flow, Short Grass Pasture Kv= 7.0 fps
5.3	361	Total, Increased to minimum Tc = 6.0 min			

Subcatchment 6S: Hennepin East Polishing Pond Watershed

Hydrograph



Summary for Pond EAP: East Ash Pond

Inflow Area = 22.701 ac, 59.67% Impervious, Inflow Depth = 8.75" for 1,000-yr event
 Inflow = 23.93 cfs @ 15.73 hrs, Volume= 16.551 af
 Outflow = 17.72 cfs @ 16.83 hrs, Volume= 16.187 af, Atten= 26%, Lag= 66.1 min
 Primary = 6.92 cfs @ 16.83 hrs, Volume= 9.491 af
 Secondary = 0.00 cfs @ 0.00 hrs, Volume= 0.000 af
 Tertiary = 10.80 cfs @ 16.83 hrs, Volume= 6.695 af

Routing by Dyn-Stor-Ind method, Time Span= 0.00-120.00 hrs, dt= 0.01 hrs
 Starting Elev= 489.97' Surf.Area= 0.000 ac Storage= 11.526 af
 Peak Elev= 491.37' @ 16.83 hrs Surf.Area= 0.000 ac Storage= 17.836 af (6.310 af above start)

Plug-Flow detention time= 1,731.2 min calculated for 4.660 af (28% of inflow)
 Center-of-Mass det. time= 498.3 min (1,350.1 - 851.8)

Volume	Invert	Avail.Storage	Storage Description
#1	482.00'	42.172 af	Custom Stage Data Listed below

Elevation (feet)	Inc.Store (acre-feet)	Cum.Store (acre-feet)
482.00	0.000	0.000
483.00	0.239	0.239
484.00	0.387	0.626
485.00	0.808	1.434
486.00	1.140	2.574
487.00	1.489	4.063
488.00	1.819	5.882
489.00	2.482	8.364
490.00	3.260	11.624
491.00	4.327	15.951
492.00	5.041	20.992
493.00	6.121	27.113
494.00	6.826	33.939
495.00	8.233	42.172

Device	Routing	Invert	Outlet Devices
#1	Primary	489.97'	18.0" Round Culvert L= 61.0' RCP, square edge headwall, Ke= 0.500 Inlet / Outlet Invert= 489.97' / 486.81' S= 0.0518 '/ Cc= 0.900 n= 0.012, Flow Area= 1.77 sf
#2	Tertiary	458.00'	36.0" Round Culvert L= 283.0' RCP, square edge headwall, Ke= 0.500 Inlet / Outlet Invert= 458.00' / 457.50' S= 0.0018 '/ Cc= 0.900 n= 0.012, Flow Area= 7.07 sf
#3	Device 2	490.60'	5.0' long Sharp-Crested Rectangular Weir 2 End Contraction(s) C= 0.600 Limited to weir flow at low heads
#4	Device 2	493.49'	
#5	Secondary	492.66'	12.0" Round Culvert X 2.00 L= 97.0' CPP, projecting, no headwall, Ke= 0.900 Inlet / Outlet Invert= 492.66' / 488.34' S= 0.0445 '/ Cc= 0.900 n= 0.010 PVC, smooth interior, Flow Area= 0.79 sf

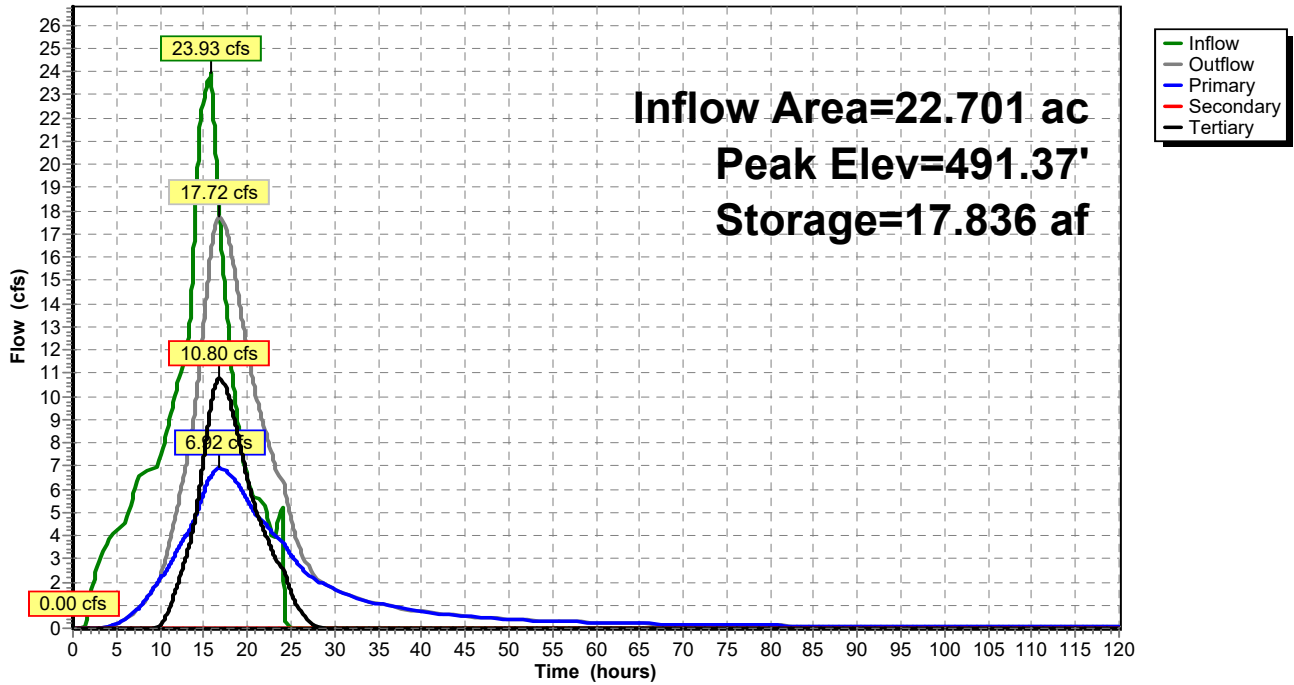
Primary OutFlow Max=6.94 cfs @ 16.83 hrs HW=491.37' TW=485.56' (Dynamic Tailwater)
 ↳ **1=Culvert** (Inlet Controls 6.94 cfs @ 4.03 fps)

Secondary OutFlow Max=0.00 cfs @ 0.00 hrs HW=489.97' TW=485.14' (Dynamic Tailwater)
 ↳ **5=Culvert** (Controls 0.00 cfs)

Tertiary OutFlow Max=10.79 cfs @ 16.83 hrs HW=491.37' TW=481.77' (Dynamic Tailwater)
 ↳ **2=Culvert** (Passes 10.79 cfs of 97.52 cfs potential flow)
 ↳ **3=Sharp-Crested Rectangular Weir** (Weir Controls 10.79 cfs @ 2.88 fps)
 ↳ **4=Orifice/Grate** (Controls 0.00 cfs)

Pond EAP: East Ash Pond

Hydrograph



Summary for Pond ELP: East Leachate Pond

Inflow Area = 35.202 ac, 53.48% Impervious, Inflow Depth > 6.38" for 1,000-yr event
 Inflow = 19.69 cfs @ 15.70 hrs, Volume= 18.728 af
 Outflow = 18.24 cfs @ 16.31 hrs, Volume= 18.690 af, Atten= 7%, Lag= 36.8 min
 Primary = 18.24 cfs @ 16.31 hrs, Volume= 18.690 af

Routing by Dyn-Stor-Ind method, Time Span= 0.00-120.00 hrs, dt= 0.01 hrs
 Starting Elev= 485.14' Surf.Area= 4.335 ac Storage= 13.482 af
 Peak Elev= 485.57' @ 16.31 hrs Surf.Area= 4.412 ac Storage= 15.349 af (1.867 af above start)

Plug-Flow detention time= 1,662.8 min calculated for 5.208 af (28% of inflow)
 Center-of-Mass det. time= 103.8 min (1,300.0 - 1,196.2)

Volume	Invert	Avail.Storage	Storage Description
#1	479.00'	64.034 af	Custom Stage Data (Conic) Listed below (Recalc)

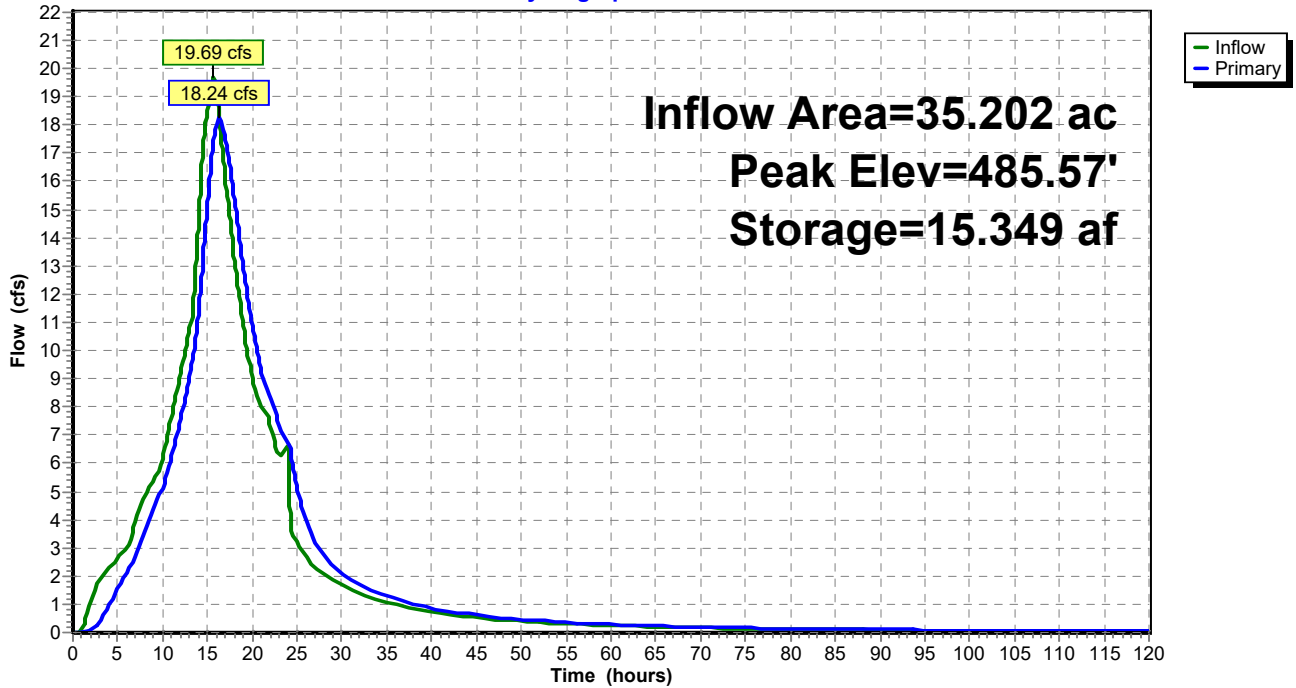
Elevation (feet)	Surf.Area (acres)	Inc.Store (acre-feet)	Cum.Store (acre-feet)	Wet.Area (acres)
479.00	0.080	0.000	0.000	0.080
480.00	0.880	0.408	0.408	0.880
481.00	1.600	1.222	1.631	1.600
482.00	2.240	1.911	3.542	2.241
483.00	2.800	2.515	6.056	2.801
484.00	3.280	3.037	9.093	3.282
485.00	4.310	3.783	12.877	4.313
486.00	4.490	4.400	17.276	4.496
487.00	4.640	4.565	21.841	4.651
488.00	4.820	4.730	26.571	4.834
489.00	4.960	4.890	31.461	4.979
490.00	5.100	5.030	36.490	5.124
491.00	5.240	5.170	41.660	5.270
492.00	5.390	5.315	46.975	5.425
493.00	5.560	5.475	52.450	5.599
494.00	5.770	5.665	58.115	5.813
495.00	6.070	5.919	64.034	6.116

Device	Routing	Invert	Outlet Devices
#1	Primary	480.40'	24.0" Round Culvert L= 157.0' RCP, square edge headwall, Ke= 0.500 Inlet / Outlet Invert= 480.40' / 479.81' S= 0.0038 1/ S Cc= 0.900 n= 0.012, Flow Area= 3.14 sf
#2	Device 1	485.14'	48.0" x 72.0" Horiz. Orifice/Grate C= 0.600 Limited to weir flow at low heads

Primary OutFlow Max=18.24 cfs @ 16.31 hrs HW=485.57' TW=481.69' (Dynamic Tailwater)
 ↑1=Culvert (Passes 18.24 cfs of 27.46 cfs potential flow)
 ↑2=Orifice/Grate (Weir Controls 18.24 cfs @ 2.14 fps)

Pond ELP: East Leachate Pond

Hydrograph



Summary for Pond EPP: East Polishing Pond

Inflow Area = 44.005 ac, 51.59% Impervious, Inflow Depth > 8.62" for 1,000-yr event
 Inflow = 36.66 cfs @ 16.14 hrs, Volume= 31.623 af
 Outflow = 31.35 cfs @ 17.70 hrs, Volume= 31.533 af, Atten= 14%, Lag= 93.6 min
 Primary = 31.35 cfs @ 17.70 hrs, Volume= 31.533 af

Routing by Dyn-Stor-Ind method, Time Span= 0.00-120.00 hrs, dt= 0.01 hrs
 Starting Elev= 480.20' Surf.Area= 3.481 ac Storage= 44.423 af
 Peak Elev= 481.81' @ 17.70 hrs Surf.Area= 3.804 ac Storage= 50.339 af (5.916 af above start)

Plug-Flow detention time= (not calculated: initial storage exceeds outflow)
 Center-of-Mass det. time= 181.1 min (1,346.9 - 1,165.9)

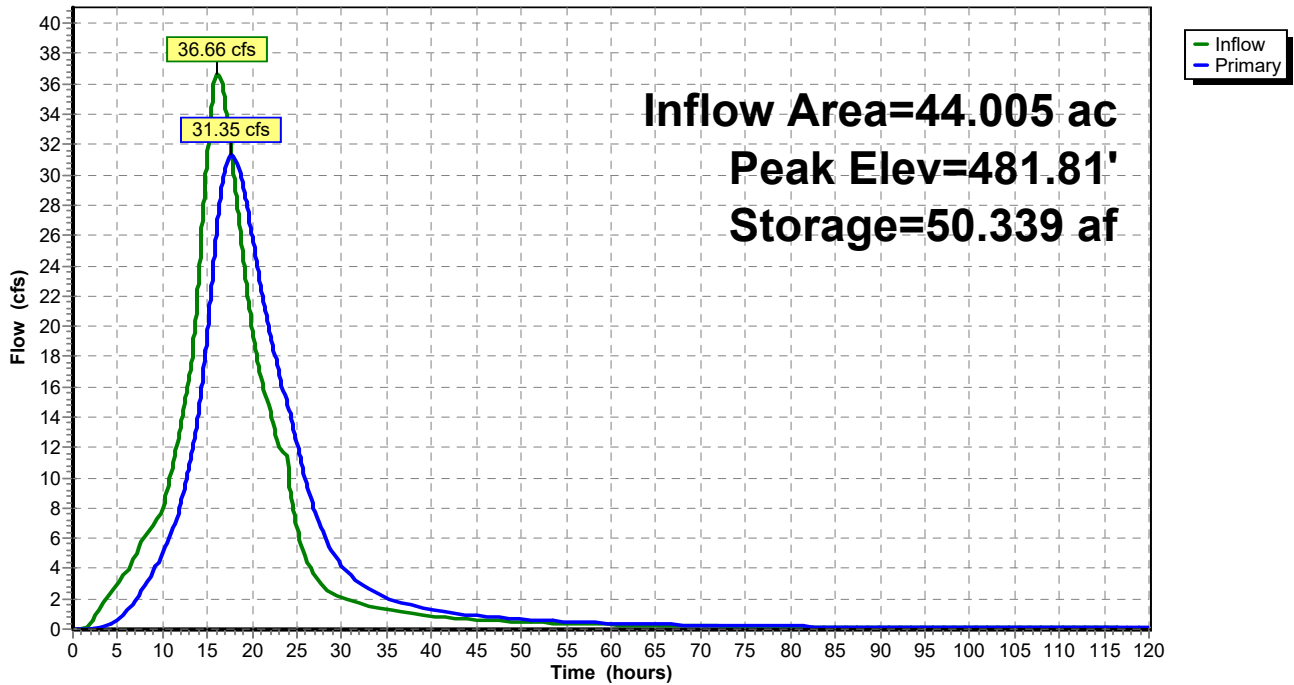
Volume	Invert	Avail.Storage	Storage Description		
#1	463.00'	122.821 af	Custom Stage Data (Conic) Listed below (Recalc)		
Elevation (feet)	Surf.Area (acres)	Inc.Store (acre-feet)	Cum.Store (acre-feet)	Wet.Area (acres)	
463.00	1.780	0.000	0.000	1.780	
464.00	1.870	1.825	1.825	1.873	
465.00	1.900	1.885	3.710	1.911	
466.00	2.050	1.975	5.684	2.063	
467.00	2.140	2.095	7.779	2.156	
468.00	2.230	2.185	9.964	2.249	
469.00	2.320	2.275	12.239	2.343	
470.00	2.410	2.365	14.604	2.437	
471.00	2.510	2.460	17.064	2.540	
472.00	2.610	2.560	19.623	2.644	
473.00	2.710	2.660	22.283	2.748	
474.00	2.810	2.760	25.043	2.852	
475.00	2.910	2.860	27.903	2.956	
476.00	3.010	2.960	30.863	3.060	
477.00	3.110	3.060	33.923	3.164	
478.00	3.220	3.165	37.087	3.278	
479.00	3.320	3.270	40.357	3.383	
480.00	3.430	3.375	43.732	3.497	
481.00	3.690	3.559	47.291	3.759	
482.00	3.830	3.760	51.051	3.903	
483.00	4.010	3.920	54.971	4.086	
484.00	4.620	4.311	59.282	4.697	
485.00	4.880	4.749	64.032	4.960	
486.00	5.070	4.975	69.006	5.153	
487.00	5.260	5.165	74.171	5.347	
488.00	5.440	5.350	79.521	5.532	
489.00	5.630	5.535	85.056	5.726	
490.00	5.810	5.720	90.775	5.910	
491.00	6.000	5.905	96.680	6.105	
492.00	6.190	6.095	102.775	6.299	
493.00	6.390	6.290	109.065	6.504	
494.00	6.850	6.619	115.683	6.966	
495.00	7.430	7.138	122.821	7.548	

Device	Routing	Invert	Outlet Devices
#1	Primary	458.00'	36.0" Round Outfall to Illinois River L= 655.0' RCP, square edge headwall, Ke= 0.500 Inlet / Outlet Invert= 458.00' / 452.16' S= 0.0089 ' / Cc= 0.900 n= 0.015, Flow Area= 7.07 sf
#2	Device 1	480.20'	5.0' long Sharp-Crested Rectangular Weir 2 End Contraction(s) 84.0" x 108.0" Horiz. Orifice/Grate C= 0.600 Limited to weir flow at low heads
#3	Device 1	494.30'	

Primary OutFlow Max=31.35 cfs @ 17.70 hrs HW=481.81' TW=462.00' (Dynamic Tailwater)
 1=Outfall to Illinois River (Passes 31.35 cfs of 90.23 cfs potential flow)
 2=Sharp-Crested Rectangular Weir (Weir Controls 31.35 cfs @ 4.15 fps)
 3=Orifice/Grate (Controls 0.00 cfs)

Pond EPP: East Polishing Pond

Hydrograph



Summary for Link 9L: Illinois River Tailwater

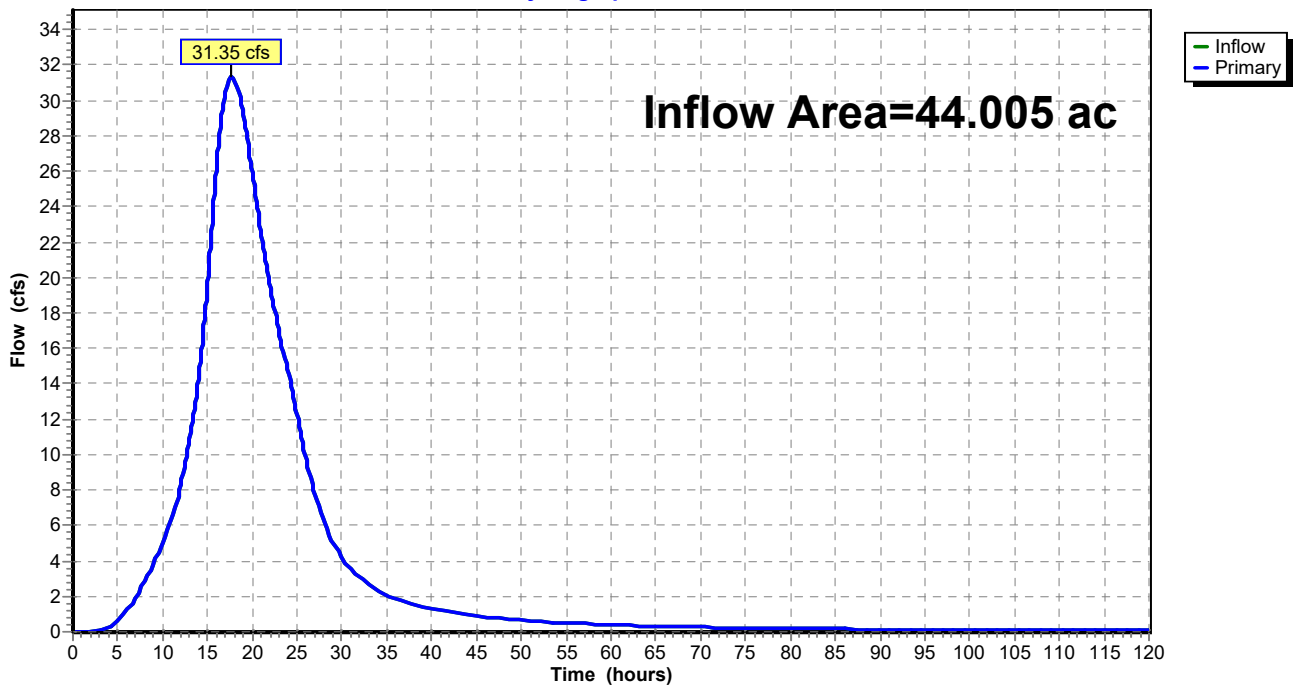
Inflow Area = 44.005 ac, 51.59% Impervious, Inflow Depth > 8.60" for 1,000-yr event
Inflow = 31.35 cfs @ 17.70 hrs, Volume= 31.533 af
Primary = 31.35 cfs @ 17.70 hrs, Volume= 31.533 af, Atten= 0%, Lag= 0.0 min

Primary outflow = Inflow, Time Span= 0.00-120.00 hrs, dt= 0.01 hrs

Fixed water surface Elevation= 462.00'

Link 9L: Illinois River Tailwater

Hydrograph





Office Memorandum

Date: October 1, 2021

To: Cynthia Vodopivec

cc: Charles Koudelka

From: Vic Modeer

Subject: Dynegy Midwest Generation, LLC
Hennepin Power Station

BACKGROUND

The October 2016 certified “CCR Certification Report: Initial Structural Stability Assessment, Initial Safety Factor Assessment, and Initial Inflow Design Flood Control System Plan, Ash Pond at Hennepin Power Station” (CCR Certification Report)” prepared by AECOM describes the outlets of the East Ash Pond. The East Ash Pond utilizes a 7 ft wide x 9 ft wide concrete vertical drop structure as a secondary outflow to a 36-inch diameter reinforced concrete pipe (RCP) to the East Polishing Pond.

The CCR Certification Report states: *“An evaluation of the 36-inch spillway pipe design drawings, operational and maintenance procedures and conditions observed in the field did not identify any issues. However, the 36-inch spillway pipe has not yet been inspected using CCTV equipment because the outlet of the pipe is below the normal pool elevation in the downstream East Polishing Pond, causing the pipe to be completely full of water during normal conditions. The pool level in the East Polishing Pond must be maintained above the pipe elevation as part of station operations, and the condition precludes camera inspection. Because a thorough visual inspection of the 36-inch secondary spillway pipe has not yet been completed, AECOM cannot currently conclude that the §257.73(d)(1)(vi) requirements have been met for the secondary spillway pipe. As a corrective measure, AECOM recommends that the 36-inch secondary spillway pipe be inspected using CCTV equipment as soon as feasible and that this assessment be updated with documentation of the inspection at that time.”*

The Hennepin Power Station boiler was shut down and ceased operation on November 1, 2019.

EVALUATION

2021 Pipe Inspection.

The October 4, 2021 inspection was performed on the 36-inch spillway by Jason Stuckey. A visual inspection of the horizontal pipe was possible as water was not flowing at the time of the inspection. The inspection of the 7 ft wide x 9 ft wide concrete vertical drop structure as a secondary outflow to a 36-inch diameter reinforced concrete pipe (RCP) did not show any deficiencies in the concrete drop inlet structure or the pipe.

Based on these evaluations, the East Ash Pond meets the requirements in § 257.73(d)(1)(vi). Please let me know if you have any questions.

Sincerely,



Vic Modeer, PE, D.GE
(IL, MO, IN, KY, OH, LA)
Engineering Manager



