

Electric Energy, Inc.
1500 Eastport Plaza Drive
Collinsville, IL 62234

November 4, 2025

Illinois Environmental Protection Agency
Bureau of Land – MC#33
Attn: Part 845 Coal Combustion Residual Rule Submittal
2520 West Iles Avenue
P.O. Box 19276
Springfield, IL 62794

Re: Joppa Power Plant East Ash Pond; IEPA ID # W1270100004-02

Dear Mr. LeCrone:

In accordance with Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845.610(b)(3)(D), Electric Energy, Inc. is submitting groundwater monitoring data for the Quarter 3, 2025 sampling event at the Joppa Power Plant East Ash Pond identified by Illinois Environmental Protection Agency (IEPA) ID No. W1270100004-02. This data is being submitted and placed in the facility's operating record as required by 35 I.A.C. § 845.800(d)(15) within 60 days of receiving final laboratory analytical data. Results were evaluated for compliance with the groundwater protection standards (GWPSs) described in 35 I.A.C. § 845.600 to determine exceedances¹ of the GWPS.

The date of this submittal is considered to be the date that exceedances of the GWPSs were detected. This notification of exceedances of the GWPSs in 35 I.A.C. § 845.600 will be placed in the facility's operating record within 30 days as required by 35 I.A.C. § 845.800(d)(16).

A Corrective Measures Assessment (CMA) for the East Ash Pond was initiated on November 20, 2023, completed, and submitted to IEPA on April 18, 2024 in accordance with 35 I.A.C. § 845.660. The CMA was the first step towards developing a Corrective Action Plan, which ultimately selects a remedy to address all releases from the East Ash Pond. The selected remedy meets the performance standards of 35 I.A.C. § 845.670(d). A public meeting was held on March 19, 2025, prior to selection of a remedy in accordance with 35 I.A.C. § 845.660(d), and a Corrective Action Plan was submitted to IEPA on April 16, 2025. Once implemented and completed, the selected remedy will attain the GWPSs.

Sincerely,



Dianna Tickner, PE, PMP
Senior Director, Demolition and Decommission

Enclosures

Groundwater Monitoring Data and Detected Exceedances, Quarter 3, 2025, East Ash Pond, Joppa Power Plant, Joppa, Illinois

¹ Throughout this document, "exceedance" or "exceedances" is intended to refer only to potential exceedances of proposed applicable background statistics or GWPSs as described in the proposed groundwater monitoring program, which was submitted to the IEPA on October 25, 2021 as part of Electric Energy, Inc. operating permit application for Joppa East Ash Pond, and subsequently revised on September 4, 2025. That operating permit application, including the proposed groundwater monitoring program, remains under review by the IEPA and therefore Electric Energy, Inc. has not identified any actual exceedances.

35 I.A.C. § 845.610(b)(3)(D) GROUNDWATER MONITORING DATA AND DETECTED EXCEEDANCES¹ QUARTER 3, 2025 EAST ASH POND, JOPPA POWER PLANT, JOPPA, ILLINOIS

November 4, 2025

Samples were collected and analyzed for the parameters listed in Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845.600(a), calcium, and turbidity. Final laboratory analytical data was received on 9/5/2025.

The monitoring well locations are included in **Figure 1. Attachment A** summarizes the groundwater elevation data for the Quarter 3, 2025 sampling event. XSG01 was dry; therefore, groundwater elevation data was not collected. **Table 1** is a summary of the field parameters and analytical results. **Attachment B** contains the associated laboratory analytical reports and field data sheets for the Quarter 3, 2025 sampling event.

In accordance with 35 I.A.C. § 845.610(b)(3)(C) and the statistical analysis plan submitted with the operating permit application (Appendix A of the Groundwater Monitoring Plan)², and subsequently revised and submitted to IEPA³, W constituent concentrations observed at compliance monitoring wells in Quarter 3, 2025 were evaluated for compliance with the groundwater protection standards (GWPSs) described in 35 I.A.C. § 845.600 to determine exceedances of the GWPS (**Table 2**). **Attachment C** shows the results of the comparison to background levels.

The date of this submittal is considered to be the date that the exceedances were detected.

As allowed in 35 I.A.C. § 845.650(e), an Alternative Source Demonstration⁴ (ASD) was submitted on October 21, 2023 for the exceedances of the GWPS detected during the Quarter 2, 2023 sampling event. The IEPA provided a written concurrence with the ASD on February 1, 2024⁵. An exceedance of the pH GWPS was detected during the Quarter 3, 2025 sampling event in the same monitoring well (51D) identified

¹ Throughout this document, "exceedance" or "exceedances" is intended to refer only to potential exceedances of proposed applicable background statistics or Groundwater Protection Standards (GWPSs) as described in the proposed groundwater monitoring program, which was submitted to the IEPA on October 25, 2021 as part of Electric Energy, Inc. operating permit application for Joppa East Ash Pond. That operating permit application, including the proposed groundwater monitoring program, remains under review by the IEPA and therefore Electric Energy, Inc. has not identified any actual exceedances.

² Ramboll Americas Engineering Solutions, Inc. (Ramboll), 2021. *Groundwater Monitoring Plan. East Ash Pond. Joppa Power Plant. Joppa, Illinois. October 25, 2021.*

³ Ramboll Americas Engineering Solutions, Inc. (Ramboll), 2025. *Groundwater Monitoring Plan. East Ash Pond. Joppa Power Plant. Joppa, Illinois. April 16, 2025.*

⁴ Ramboll Americas Engineering Solutions, Inc. (Ramboll), 2023. 35 I.A.C. § 845.650(E): *Alternative Source Demonstration, East Ash Pond, Joppa Power Plant, Joppa, IL, IEPA ID: W1270100004-02. April 18, 2024.*

⁵ Illinois Environmental Protection Agency (IEPA), 2023. *Letter from Michael Summers (IEPA) to Dianna Tickner (Electric Energy, Inc.), Re: Joppa Power Plant East Ash Pond; W1270100004-02, Alternative Source Demonstration (ASD) Submittal. November 16, 2023.*

in the approved ASD; therefore, groundwater monitoring may continue in accordance with 35 I.A.C. § 845.650(e)(5).

TABLES

Table 1	Field Parameters and Analytical Results - Quarter 3, 2025
Table 2	Evaluation of Compliance - Quarter 3, 2025

FIGURES

Figure 1	Monitoring Well Location Map
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ATTACHMENTS

Attachment A	Groundwater Elevation Data - Quarter 3, 2025
Attachment B	Laboratory Reports and Field Data Sheets - Quarter 3, 2025
Attachment C	Comparison to Background - Quarter 3, 2025

TABLES

FIGURES

ATTACHMENTS

**ATTACHMENT A
GROUNDWATER ELEVATION DATA
QUARTER 3, 2025**

**ATTACHMENT B
LABORATORY REPORTS AND FIELD DATA SHEETS
QUARTER 3, 2025**



Report Contents

<http://www.teklabinc.com/>

Client: Ramboll

Work Order: 25071641

Client Project: JOP-25Q3

Report Date: 04-Sep-25

This reporting package includes the following:

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