

May 29, 2025

SEMIANNUAL REMEDY SELECTION PROGRESS REPORT NEW EAST ASH POND VERMILION POWER PLANT

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

This report is for activities occurring between November 30, 2024 and May 29, 2025 at the New East Ash Pond (NEAP) at Vermilion Power Plant.

An application for an operating permit for the NEAP required by 35 I.A.C § 845.230 was submitted to the Illinois Environmental Protection Agency (IEPA) by October 31, 2021 and is pending approval. An evaluation of background groundwater quality was completed and presented in the operating permit application. The operating permit application and related documents can be found on the company's publicly available CCR website: <https://www.luminant.com/ccr/illinois-ccr/>.

Quarterly groundwater sampling for compliance evaluation in accordance with 35 I.A.C. § 845.650 was initiated at the NEAP during Quarter 2, 2023. Exceedances¹ of groundwater protection standards established under 35 I.A.C. § 845 were determined and require corrective action in accordance with 35 I.A.C. § 845.650(d)(3). Accordingly, a Corrective Measures Assessment (CMA) was completed in accordance with 35 I.A.C. § 845.660 and submitted to IEPA on May 29, 2024.

As required by 35 I.A.C. § 845.670, a corrective action plan that identifies the selected remedy must be submitted to IEPA within one year after completing the CMA. Activities currently ongoing in support of developing the corrective action plan include development of a corrective action alternatives analysis, human health and ecological risk assessment, and supporting technical documents. Accordingly, a public meeting was held on April 7, 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 May 27, 2025.

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