

October 3, 2024

SEMIANNUAL REMEDY SELECTION PROGRESS REPORT NEWTON PRIMARY ASH NEWTON POWER PLANT

The owner or operator of a coal combustion residuals (CCR) unit must prepare a semiannual report describing the progress in selecting and designing a groundwater corrective action remedy and developing a corrective action plan.

This report is for activities occurring between April 4, 2024 and October 3, 2024 at the Primary Ash Pond (PAP) at the Newton Power Plant.

An application for an operating permit required by Title 35 of the Illinois Administrative Code (35 I.A.C.) § 845.230 was submitted for the PAP to the Illinois Environmental Protection Agency (IEPA) by October 31, 2021 and is pending approval. An evaluation of background groundwater quality was completed and presented in the operating permit application, and subsequently updated following the installation of an additional monitoring well to characterize background groundwater quality. The operating permit application and related documents can be found on the company's publicly available CCR website:

<https://www.luminant.com/ccr/illinois-ccr/>.

Quarterly groundwater sampling for compliance in accordance with 35 I.A.C. § 845.650 was initiated at the PAP during Quarter 2, 2023. Exceedances of groundwater protection standards (GWPSs) for total sulfate, total lithium, and total dissolved solids established under 35 I.A.C. § 845 were determined and require corrective action through a permitting process administered by IEPA. Accordingly, a Corrective Measures Assessment (CMA) was completed in accordance with 35 I.A.C. § 845.660 and submitted to IEPA on April 3, 2024.

As stated in the notification letter dated June 26, 2024, a statistically significant level (SSL) for total lithium was identified at the PAP following Assessment Monitoring completed in accordance with Title 40 of the Code of Federal Regulations (40 C.F.R.) § 257.95. The CMA referenced above also meets the applicable and equivalent requirements of 40 C.F.R. § 257.96 to address the total lithium SSL because the 35 I.A.C. § 845.600 GWPS exceedance for total lithium is similar to the total lithium SSL identified under 40 C.F.R. § 257.95¹.

In accordance with 40 C.F.R. § 257.97, remedy selection is to be completed as soon as feasible following completion of the CMA. As required by 35 I.A.C. § 845.670, a corrective action plan that identifies the selected remedy must be submitted to IEPA within one year after completing the CMA in accordance with 35 I.A.C. § 845.660. A corrective action plan will be submitted to IEPA on or before April 3, 2025 that meets the requirements of both 40 C.F.R. § 257 and 35 I.A.C. § 845.

¹ Ramboll Americas Engineering Solutions, Inc., 2024. Corrective Measures Assessment Required by 40 C.F.R. § 257.96, Newton Power Plant, Primary Ash Pond – CCR Unit ID 501. April 3, 2024.
<https://www.luminant.com/documents/ccr/Illinois/Newton/2024/2024-Newton-2024%2004%2003%20Newton%20PAP%20CMA%20and%20N&E%20report-Primary%20Ash%20Pond.pdf>