



April 17, 2025

Illinois Environmental Protection Agency
2520 West Iles Avenue
P.O. Box 19276
Springfield, Illinois 62794

Re: **Demonstration for 60-Day Extension – Corrective Measures Assessment**
Powerton Generation Station
Permit No. 2024-CO-100029
Midwest Generation, LLC
Pekin, Illinois

On behalf of Midwest Generation, LLC (MWG), **Weaver Consultants Group North Central, LLC (WCG)** is submitting this Demonstration for 60-Day Extension – Corrective Measures Assessment memo pursuant to Illinois' Coal Combustion Residuals (CCR) Rule 35 IAC 845.660(a)(2). As identified in the *Notice of Exceedance of Groundwater Protection Standards* dated January 7, 2025, groundwater monitoring analytical results from CCR monitoring wells associated with Powerton Generation Station (Powerton) have triggered requirements pursuant to §845.660 to implement a Corrective Measures Assessment (CMA). The CMA is to be initiated within 90 days of confirming laboratory sample results, and it must be completed and submitted to the Illinois Environmental Protection Agency (IEPA) within 90 days of initiation. MWG has initiated an ongoing effort to complete a nature and extent characterization, pursuant to §845.650(d)(1). Interim results from the nature and extent characterization indicate investigation of the Metals Cleaning Basin (MCB) and Ash Surge Basin (ASB) liner is recommended via a liner-leak survey.

WCG has determined that completing the Corrective Measures Assessment (CMA) pursuant to §35 IAC 845.660 will require additional time beyond the regulatory 90-day completion period. An extension of 60 days is requested. This extension is requested to allow time for scheduling and completion of a liner-leak survey on the MCB and ASB in cooperation with the Powerton operating facility schedule. The completion of this liner-leak survey is imperative to the development of a reliable and complete nature and extent characterization to inform the CMA. It is anticipated that the 60-day extension will allow for completion of the liner-leak survey and the findings will be presented in the CMA Report. Based on communication with the Powerton facility, it is currently anticipated that the MCB and ASB will be properly prepared by

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removing CCR in a time period to allow for the liner-leak surveys to be completed by June 2025. The results of the surveys will then be included in the nature and extent characterization used to inform the CMA.

Pursuant to §845.660(a)(2), I certify that MWG has demonstrated the need for an additional 60 days beyond the specified regulatory time period of 90 days to complete the CMA associated with Permit Number 2024-CO-100029. This extension request will now set the submission deadline of the CMA to be August 10, 2025.

This certification as submitted is to the best of my knowledge, accurate, and complete.

Sincerely,

Weaver Consultants Group North Central, LLC

Professional Engineer's Seal

Signature: Amy Wagner

Date: 04/17/2025

Certifying Engineer

Print Name: Amy Wagner, P.E.
Illinois License No.: 062.071816
License Expiration Date: 11/30/2025
Title: Senior Project Engineer

