MWG
Midwest Generation, LLC

Midwest Generation, LLC

Powerton Generating Station

Documentation of Public Meeting

35 Ill. Adm. Code Sections 845.240(d) and 845.800(d)(2)

Midwest Generation, LLC's (MWG) Powerton Generating Station (Powerton Station) is located at 13082 E. Manito Road in Pekin, Illinois. Powerton Station operates the Ash Surge Basin and Metal Cleaning Basin.

Pursuant to Section 845.240, MWG held two public meetings on the tentative applications and as required by subsection (d) of that section, MWG is placing documentation of the meeting in its operating record consisting of the following Exhibits:

Exhibit A:	Public Notice
Exhibit B:	Map of 2-mile radius of impoundment (selected postal routes highlighted blue) and USPS Every Door Direct Mail forms
Exhibit C:	Posting of notice in conspicuous locations within 10 miles of the facility
Exhibit D:	Letter to Illinois EPA requesting notice be sent to listserv for MWG
Exhibit E:	Presentation for July 6 and 7, 2026 public meetings
Exhibit F:	Summary of public meetings

Exhibit A:

Public Notice

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Public Notice

Midwest Generation to Host Public Meetings on Proposed Corrective Action at Powerton Generating Station

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What: Midwest Generation, LLC (MWG) is hosting two public meetings to share information and engage with the community about proposed corrective action for the Ash Surge Basin and Metal Cleaning Basin at Powerton Generating Station. MWG will present the results of the assessment of corrective measures initiated due to exceedances of groundwater protection standards. After the presentation, attendees will have an opportunity to participate in a question-and-answer session.

When: Monday, July 6, 2026, 6 p.m. to 8 p.m.
Tuesday, July 7, 2026, 10 a.m. to 12 p.m.

Where: Avanti's Dome*
3401 Griffin Ave
Pekin, IL 61554
**Accessible to persons with disabilities.*

Information on the proposed corrective action will be posted at **midwestgenerationllc.com** no later than **June 6, 2026**. Contact: **midwestgeneration@nrg.com.**

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Public Notice

Midwest Generation to Host Public Meetings on Proposed Corrective Action at Powerton Generating Station

PRSRT STD
ECRWSS
U.S. POSTAGE
PAID
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**** ECRWSS EDDM **

Postal Customer

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Exhibit B:

Map of 2-mile radius of impoundment - selected postal routes highlighted blue

Search for Routes

13082 E Manito Rd, Pekin, Il

Radius

2 mi

Search

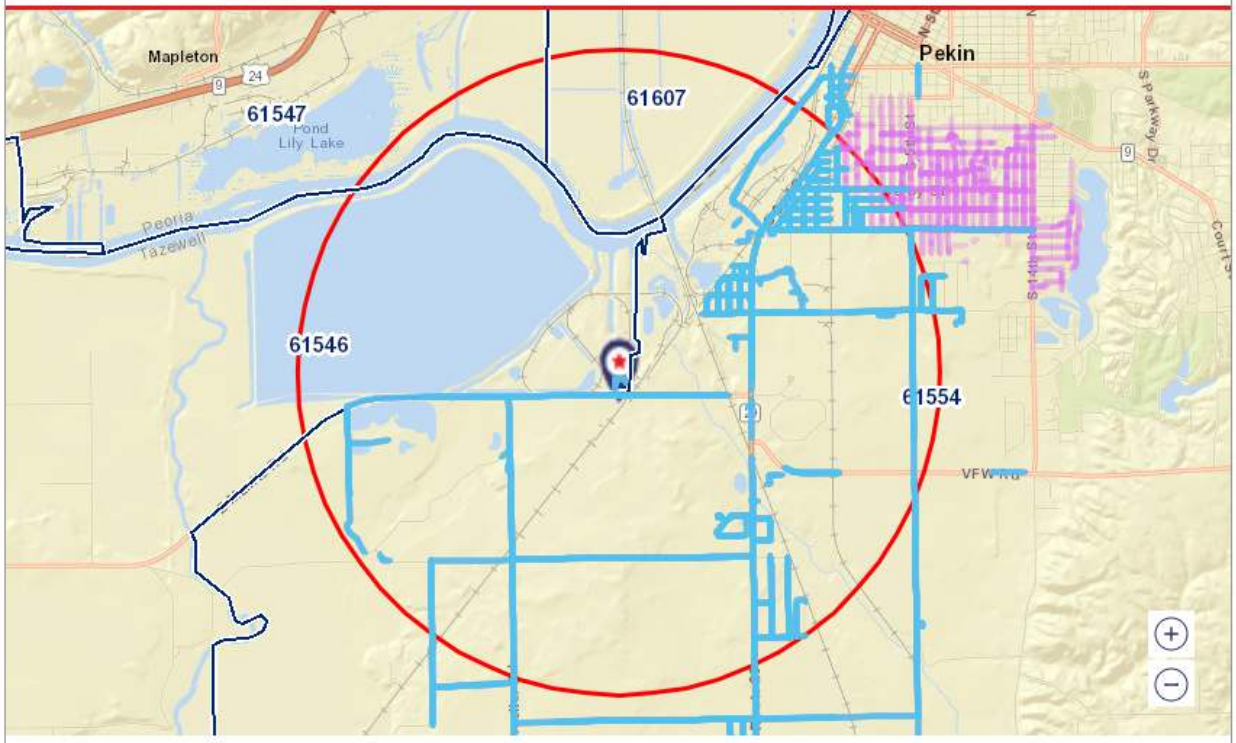
Clear

Mailpiece Size Checker

Refine Search

View as: Map Table

Route	Residential	Business	Total	Age: 25-34	Size	Income	Cost
–	–	–	–	–	–	–	–



Map Key

Show

Order Summary

Selected Routes
2

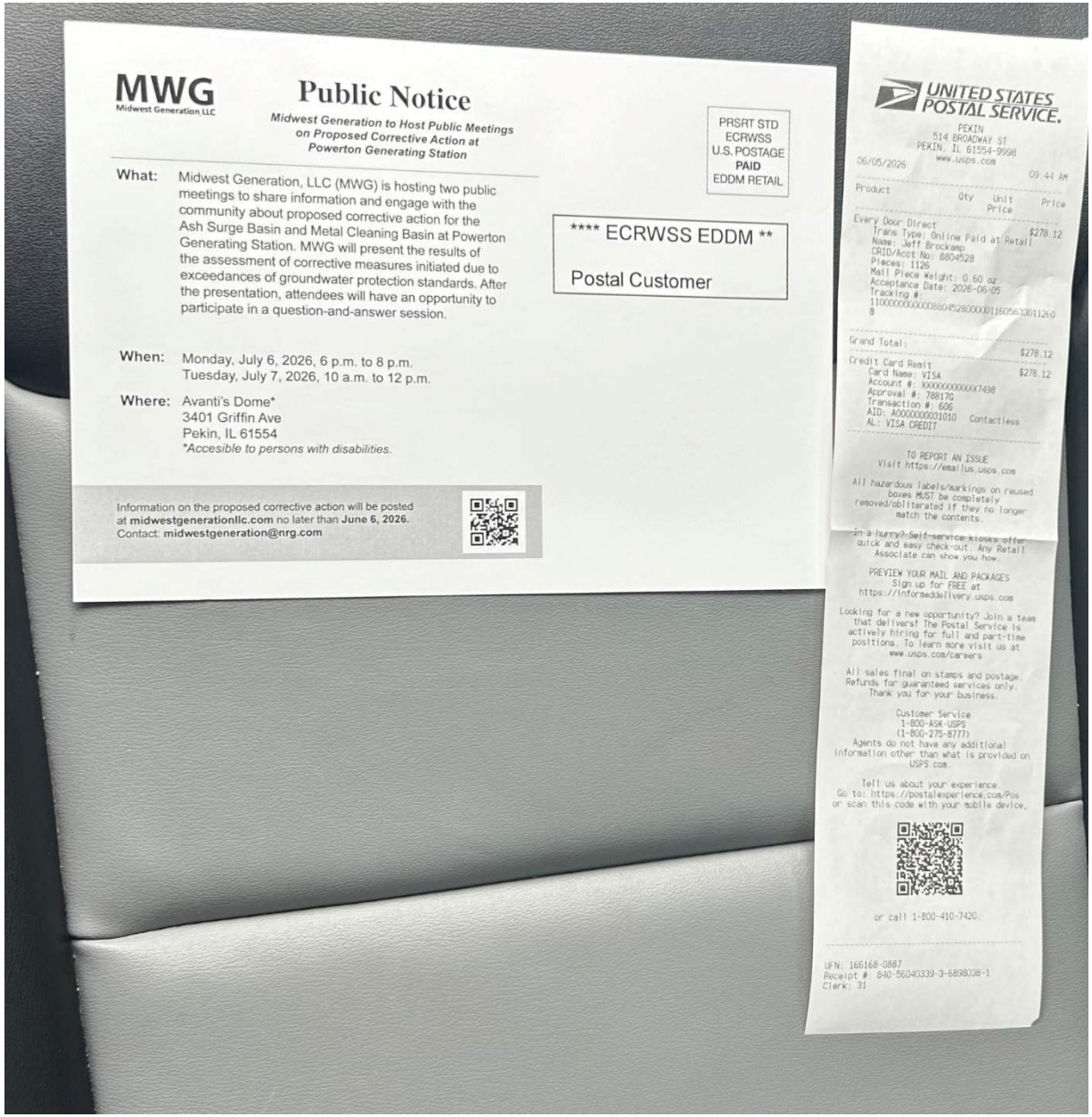
Post Office™ Drop-Offs
1

Total Mailpieces
1121

Approximate Cost
$291.46

Next Step

Clear Routes



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UNITED STATES POSTAL SERVICE.

PEKIN
514 BROADWAY ST
PEKIN, IL 61554-9998
www.usps.com

06/05/2026 09:44 AM

Product	Qty	Unit Price	Price
Every Door Direct Trans Type: Online Paid at Retail Name: Jeff Brockamp CRID/Acct No: 6804528 Pieces: 1126 Mail Piece Weight: 0.60 oz Acceptance Date: 2026-06-05 Tracking #: 1100000000000680452800000116056330112608			$278.12
Grand Total:			$278.12
Credit Card Remit Card Name: VISA Account #: XXXXXXXXXXXX7498 Approval #: 78817G Transaction #: 606 AID: A0000000031010 Contactless AL: VISA CREDIT			$278.12

TO REPORT AN ISSUE
Visit https://emailus.usps.com

All hazardous labels/markings on reused boxes MUST be completely removed/obliterated if they no longer match the contents.

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Agents do not have any additional information other than what is provided on USPS.com.

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or scan this code with your mobile device,

or call 1-800-410-7420.

UFN: 166168-0887
Receipt #: 840-56040339-3-6898038-1
Clerk: 31

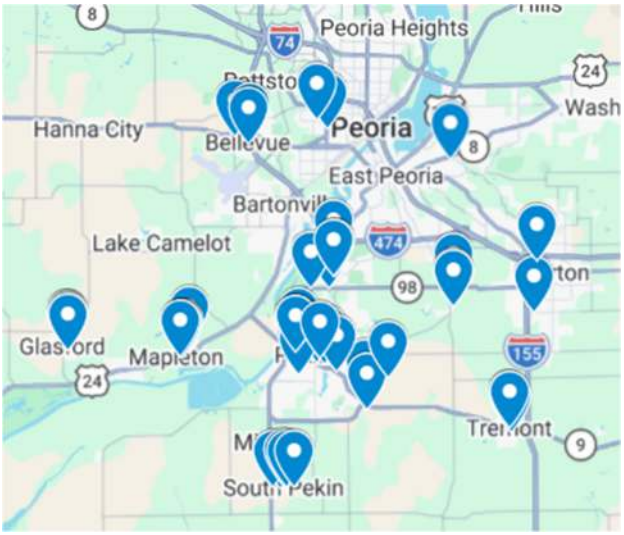
Exhibit C:

Posting of notice in conspicuous locations within 10 miles of the facility

NRG Community Posting Summary

June/July 2026

The summary below details actions taken by Midwest Generation to meet Section 845.240 regulations for Pre-Application Public Notification and Public Meetings. These regulations require the owner or operator of a CCR surface impoundment to "post the notice in conspicuous locations throughout villages, towns, or cities within 10 miles of the facility, or use appropriate broadcast media (such as radio or television)."



On Thursday, June 4, 2026, Morreale posted public notices in many of these locations. In instances where we did not post a notice, the facilities were closed or refused to allow postings that day. In total, 27 public notice flyers were posted within a 10-mile radius of the City of Pekin – covering surrounding areas including, South Pekin, North Pekin, Mapleton, Creve Coeur, Groveland, Tremont, and Morton.

Pekin

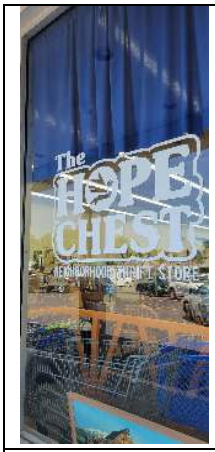
Public meeting notices were placed at **10 locations**, including:

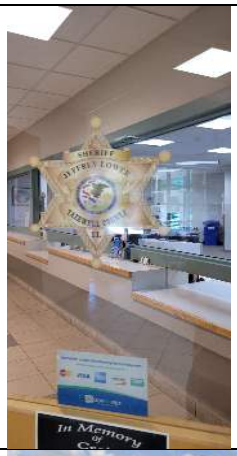
Pekin Public Library	301 S 4th St
Pekin Community Bank	601 Court St
Casey's General Store	1800 N 8th St
Miller Center	551 S. 14th St.
Casey's General Store	2106 Court St
Coffee Connection	404 Court St
Tazwell County Veterans Assistance	402 Cort Street
Sherrif's office	South Capital
Pekin Pointe	900 N 5th
The Hope Chest	Main Street

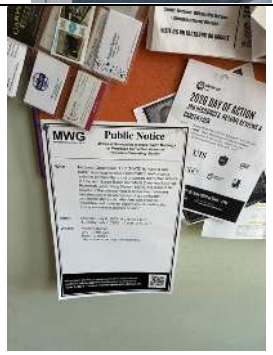
Locations that were closed or refused included:

Pekin Chamber of Commerce	402 Court St

Pekin Photos







South Pekin

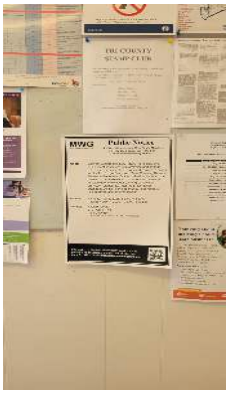
Public meeting notices were placed at **3 locations**, including:

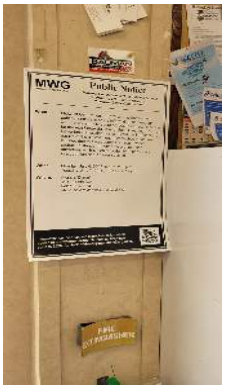
United States Postal Service	306 Main St
Casey's General Store	12031 State Rte. 29
Township office	208 Main Street

Locations that were closed or refused, included:

South Pekin Village Hall	209 W Main St
Community Fellowship Church	110 E. Main St

South Pekin Photos





North Pekin

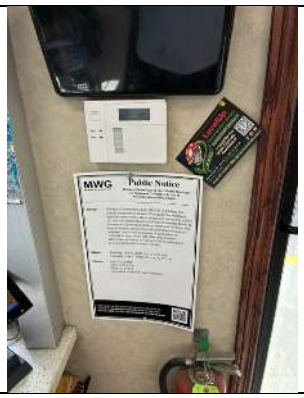
Public meeting notices were placed at **5 locations**, including:

Casey's General Store	560 S Main St
Casey's General Store	401 N Main St
Cupi's Motor Mall	845 Edgewater Dr
Village of North Pekin	206 Lincoln Blvd
Little E's Spins and wins	N. Main Street

Locations that were closed or refused, included:

Midwest Chassis, Inc.	200 Lincoln Blvd

North Pekin Photos

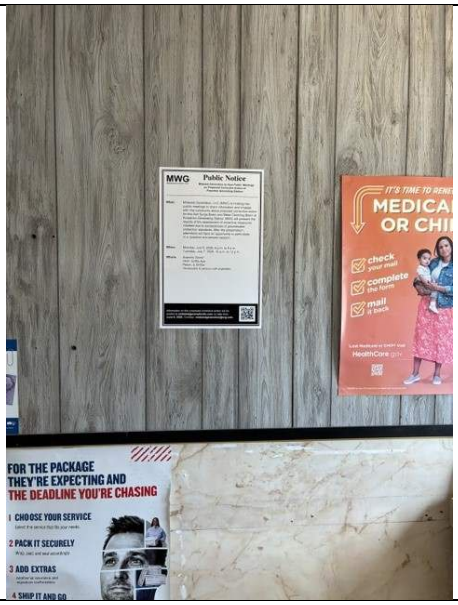


Mapleton

Public meeting notices were placed at **2 locations**, including:

Village of Mapleton	8524 W Main St
United States Postal Service	8607 W Main St

Mapleton Photos



Creve Coeur

Public meeting notices were placed at 1 **location**:

Casey's General Store	325 Rusche St

Locations that were closed or refused, included:

Creve Coeur Food Mart	100 S Main St

Creve Coeur Photo

Groveland

Public meeting notices were placed at 2 **locations**, including:

Public Library and Township Office

Casey's General Store	19416 Springfield Rd

Locations that were closed or refused, included:

United States Postal Service	18769 Springfield Rd
Woody's Family Restaurant	18706 Springfield Rd

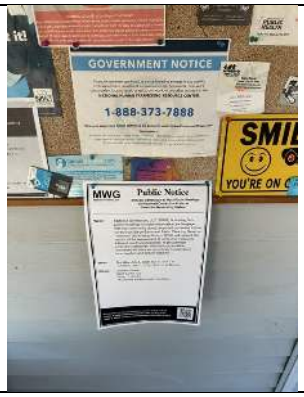
Groveland Photo

Tremont

Public meeting notices were placed at 3 **locations**, including:

Casey's General Store	218 W Pearl St
Tremont Twp Office	308 S James St
Public Library	

Tremont Photos



Morton

Public meeting notices were placed at 1 **location**, including:

Casey's General Store	101 Detroit Ave

Morton Photo

3

###

Exhibit D:

Submittal to Illinois EPA requesting notice be sent to listserv for MWG

Buckley, Jill

From: Pasquale Gianni <pgianni@morrealecomm.com>
Sent: Friday, June 5, 2026 7:08 PM
To: EPA.CCR.Part845.Coordinator@illinois.gov
Cc: Shealey, Sharene; Kotas, Joseph; Mundorf, Todd; Cresswell, Maddie; Buckley, Jill
Subject: Notice of Public Meetings for Assessment of Corrective Measures Results

Re: Powerton Generating Station – Pekin, Tazewell County, Illinois
Facility ID No. W1798010008
Notice of Public Meetings for Assessment of Corrective Measures Results

Dear Sir or Madam:

In accordance with the requirements of 35 IAC Section 845.240(b), please find below the public meeting notice for the Ash Surge Basin (ID No. W1798010008-01) and Metal Cleaning Basin (ID No. W1798010008-03) at Powerton Generating Station.

Midwest Generation, LLC requests that the Agency email the enclosed notice to the Agency's listserv for the facility. An electronic copy of this notification has been submitted to the Agency's CCR Coordinator.

If you have any questions or require additional information regarding this submittal, please contact Jill Buckley at Jill.Buckley@nrg.com or 570-948-1679.

On behalf of Jill Buckley,
Senior Manager, Environmental

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Contact: **midwestgeneration@nrg.com**

Pasquale Gianni
Director, Strategic Communications
Morreale Communications
C 310.919.8537
E pgianni@morrealecomm.com

9501 Technology Boulevard
Suite 3200
Rosemont, IL 60018

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Exhibit E:

Presentation for July 6 and 7, 2026 public meetings

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POWERTON GENERATING STATION GROUNDWATER CORRECTIVE ACTION PLAN

ID No. W1978010008-01
ID No. W1978010008-03

July 2026

Ash Surge Basin
Metal Cleaning Basin

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Safety First Moment - Summer Tips

Beach: Only swim at beaches that have a lifeguard. Never go in the water if lightning or thunder are present or in background. Make sure inexperienced swimmers are accompanied and wearing life jackets.

Camping: Share your travel plans and location with family and friends in the case of an emergency. Be sure to pack water, nutritious snacks and meals, and a first aid kit. Plan ahead for any potential dangers.

Grilling: Never grill indoors and be sure to have others keep a safe distance away from the grill. Use long-handled tools and never leave an in-use grill unattended.

Mosquitoes: Use insect repellents when outdoors. Avoid going outdoors at dusk and dawn when mosquitoes are the most active. Avoid tall grass and underbrush and inspect yourself carefully for any insects or ticks.

*** Source: redcross.org**

Listserv Sign-up Reminder

If you would like to receive a summary of this meeting or be added to the Illinois Environmental Protection Agency's listserv, visit the sign in table to provide your contact information.

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Agenda/Meeting Overview

- Purpose/Regulatory Basis
- Powerton Generating Station
- Groundwater Monitoring and the Corrective Action Process
- Groundwater Corrective Action Plan, Including Results from Groundwater Contaminant Transport Modeling
- Question & Answer Session

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Purpose/Regulatory Basis

- Groundwater monitoring is actively being performed under the Illinois CCR Rules (35 IAC 845) and Operating Permit 2024-CO-100029
- Today's meeting presents draft plans regarding a specific aspect of the Illinois Coal Combustion Residuals (CCR) Rules
- Proposed Groundwater Corrective Action pursuant to 35 IAC 845.670
  - Ash Surge Basin
  - Metal Cleaning Basin

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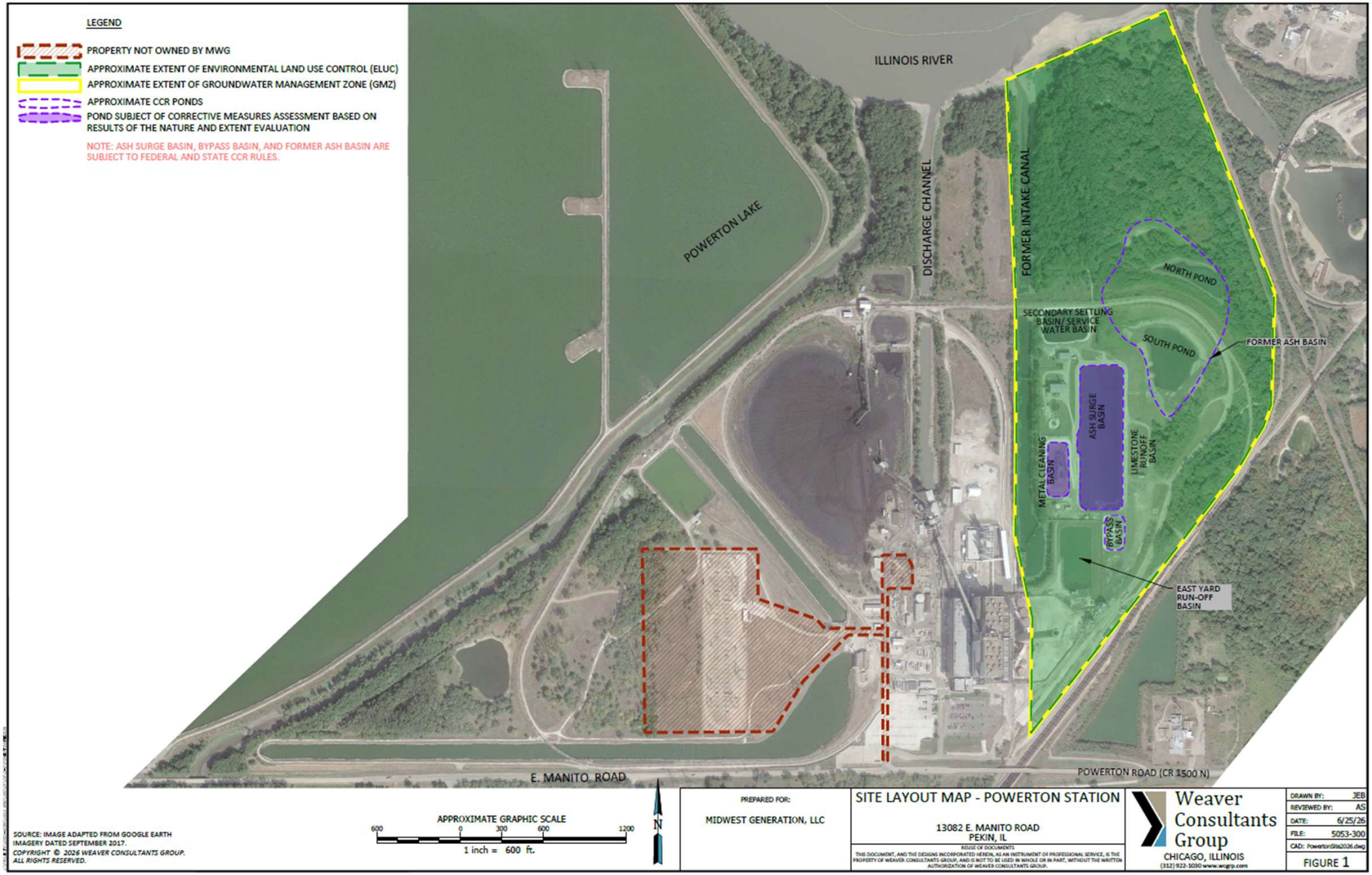
Powerton Generating Station



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Subject CCR Units

Metal Cleaning Basin (MCB)

- Occasionally used to collect and treat boiler cleaning wash waters during boiler outages. Outside of outages, the MCB is also occasionally used to temporarily store ash from maintenance activities
- Approximately 2.3 acres and was originally built in 1978 with a Poz-o-Pac and Hypalon membrane liner
- Relined with a HDPE geomembrane liner in 2010
- Construction Permit Application to retrofit with composite liner and leachate collection system submitted July 2023 – under review by Illinois EPA

Ash Surge Basin (ASB)

- Previously used as the primary settling basin for CCR and other process wastewaters
- Removed from service Oct 2024 (alternate capacity established)
- Approximately 8 acres, originally built in 1978 with a Poz-o-Pac (bottom) and Hypalon (sides) membrane liner
- Relined with a high-density polyethylene (HDPE) geomembrane liner in 2013
- Construction Permit Application to retrofit with composite liner and leachate collection system submitted July 2023 – under review by Illinois EPA

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Groundwater Monitoring Under IL CCR Rules

- Quarterly monitoring upgradient and downgradient of CCR units from two vertical zones for 20 CCR constituents listed in regulations
- Comparisons to groundwater protection standards (GWPS) established in the CCR Operating Permit
  - Greater of statistically-derived background and health-based standards from the IL CCR Rules
- Qtr. 4 2024: confirmed concentrations of sulfate, TDS, total arsenic, total cobalt, total molybdenum, total thallium, which triggered:
  - Nature & Extent Evaluation (Report submitted June 2025, Addendum May 2026)
  - Corrective Measures Assessment (CMA) (Report submitted August 2025)
  - Corrective Action Plan (CAP): due to Agency by August 2026, to be submitted in an Application for a Construction Permit - will include groundwater modeling to demonstrate how the corrective action will achieve compliance with GWPS.

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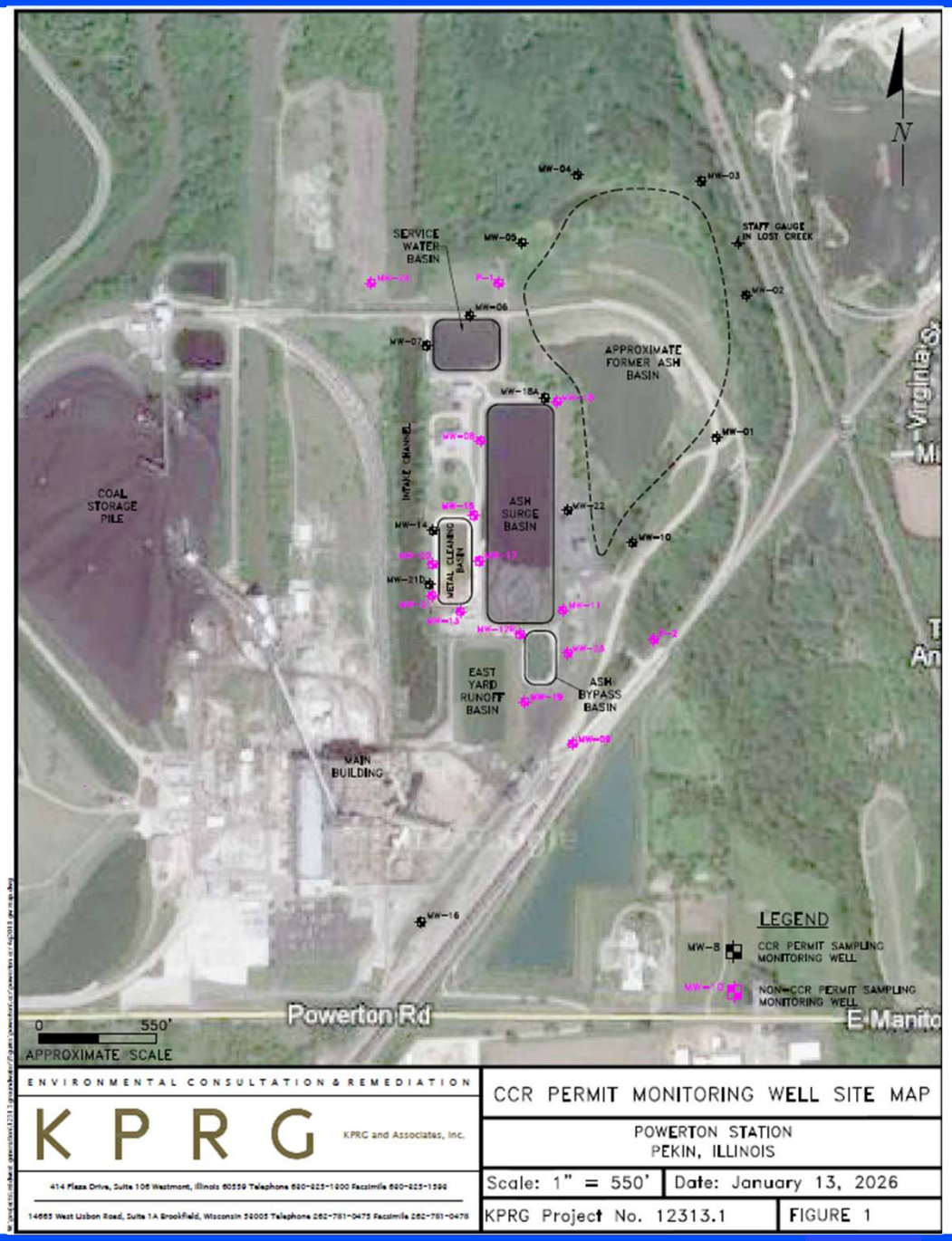
Groundwater Monitoring Network



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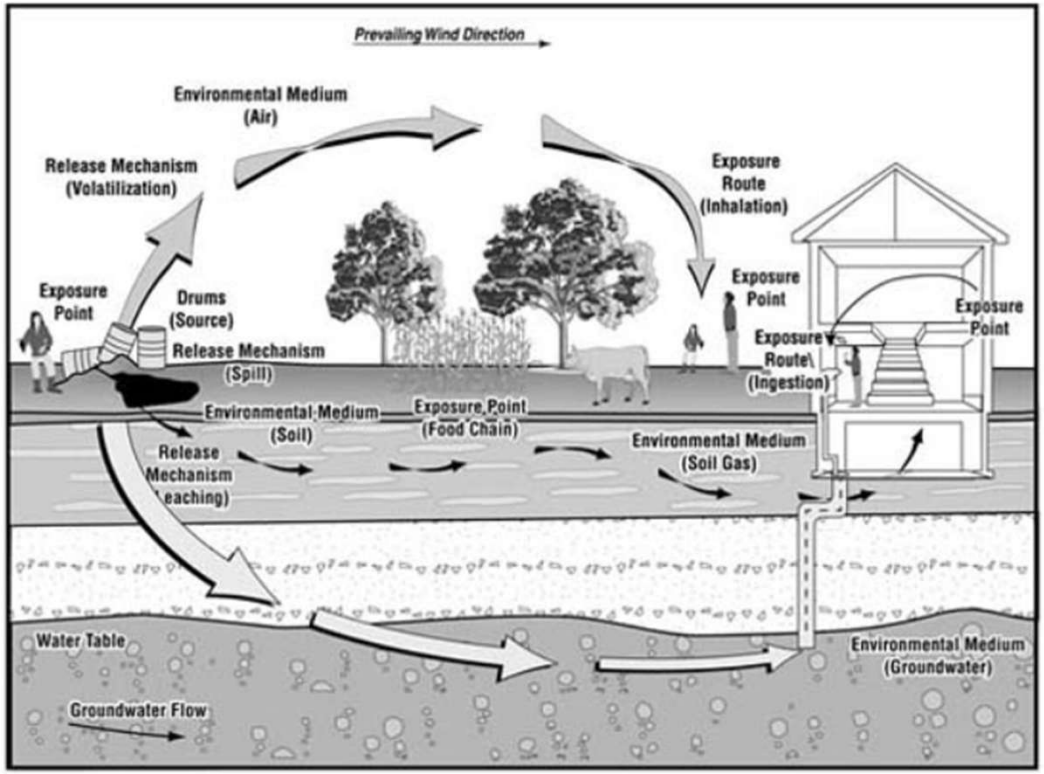
Nature & Extent Results

- Extent of groundwater impacts for sulfate, TDS, total cobalt, total molybdenum, and total thallium sufficiently defined
  - Total molybdenum below GWPS during subsequent monitoring events (Q4 2024 data a temporal/statistical anomaly)
  - Extent of groundwater impacts for total arsenic to northwest adequately defined relative to permitted units
- Laboratory Synthetic Precipitation Leaching Procedure (SPLP) testing on soil samples from berms surrounding basins exhibited concentrations below GWPS, indicating these soils are not a source
- Former Intake Canal Pore Water Sampling: no CCR parameter detections above GWPS
- Former Intake Canal Surface Water Sampling: no CCR parameter exceedances in comparison to Surface Water Quality Standards or GWPS

Risk Assessment

- Groundwater Exposure Pathway is incomplete: existing conditions pose no unacceptable threat to human health or the environment
  - Environmental Land Use Control (ELUC)
  - No potable wells impacted by the CCR units
  - CCR Constituents not volatile
  - Safety and Health Plan for Site Workers
    - Personal Protective Equipment (PPE)
    - Training



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Groundwater Corrective Action Plan (CAP)

Regulatory Overview

- 35 IAC 845.670: CAP is to be submitted to Agency as construction permit application
- CAP is based on results from CMA
- Identify selected remedy meeting required standards (listed on right)
- Include corrective action alternatives analysis
- Contain proposed schedule for implementation
- Include results from groundwater modeling

Selected Remedy Must:

- Be protective of human health and the environment
- Attain the GWPS
- Control the source(s)
- Remove from environment as much impacted material as feasible, considering factors such as avoiding inappropriate disturbance of sensitive ecosystems
- Comply with standards for management of wastes
- Alternatives evaluated using factors listed in 35 IAC 845.670(e)

Corrective Measures Alternatives Presented In CMA

Alternative 1 – Capping ASB Weir Wall

Alternative 2 – Basin Retrofit

Alternative 3 – Closure by Removal

Alternative 4 – Monitored Natural Attenuation

Alternative 5 – Hydraulic Containment/Barrier

Alternative 6 – Physical Containment

Alternative 7 – Permeable Reactive Barrier

Importantly: CMA stated that CAP will likely be comprised of a combination of one or more of above possible alternatives.

Corrective Action Alternatives Analysis [35 IAC 845.670(e)]

DRAFT - Discard after review

Evaluation Factors		Corrective Action Alternatives Presented in Corrective Measures Assessment						
		#1: Capping Ash Surge Basin Weir Wall	*#2: Basin Retrofit*	#3: Closure by Removal	*#4: Monitored Natural Attenuation*	#5: Hydraulic Containment/Barrier	#6: Physical Containment	#7: Permeable Reactive Barrier
35 IAC Section 845.670(e)(1)	Long- and short-term effectiveness and protectiveness, degree of certainty remedy will be successful	+	++	++	+	0	-	-
35 IAC Section 845.670(e)(2)	Effectiveness in controlling source	++	++	++	-	-	-	--
35 IAC Section 845.670(e)(3)	Ease or difficulty of implementation	++	+	+	++	--	-	--
35 IAC Section 845.670(e)(4)	Community concerns							

Notes:

+ = Positive

++ = Strongly Positive

0 = Neutral

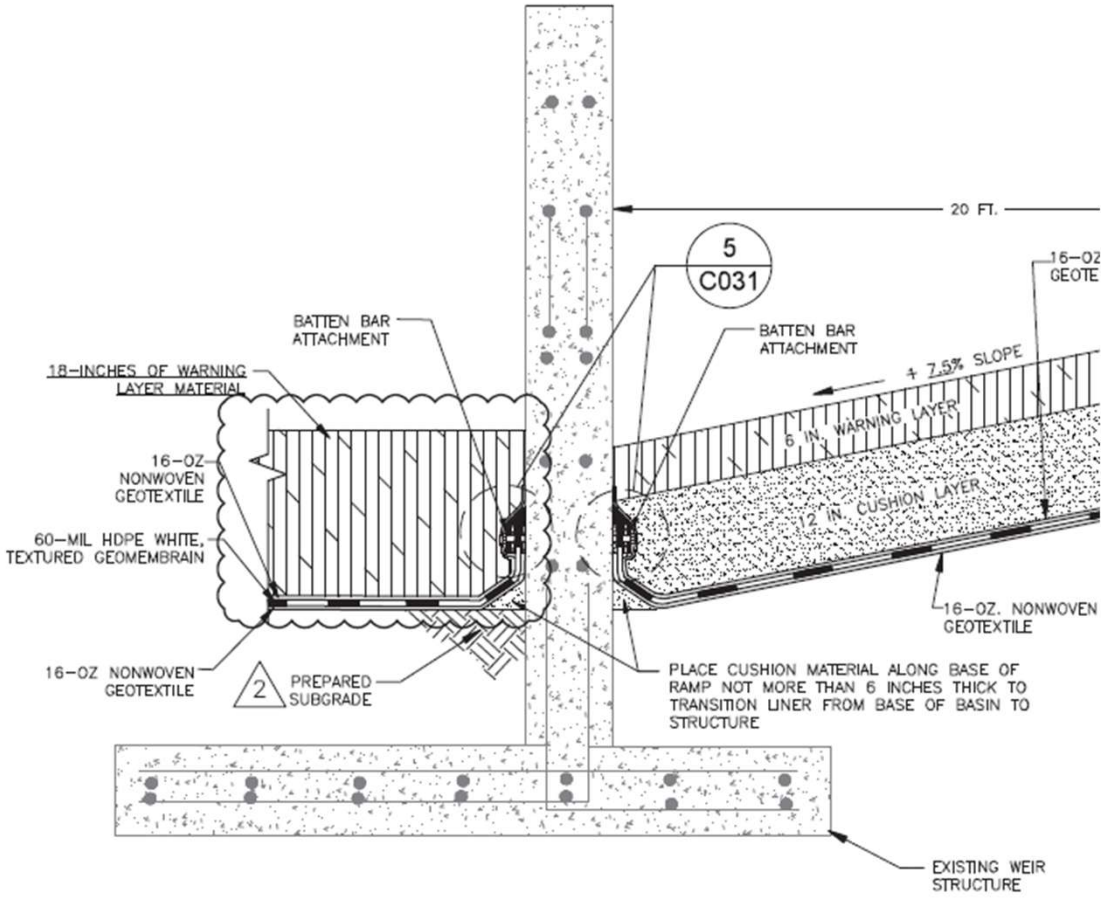
- = Negative

-- = Strongly Negative

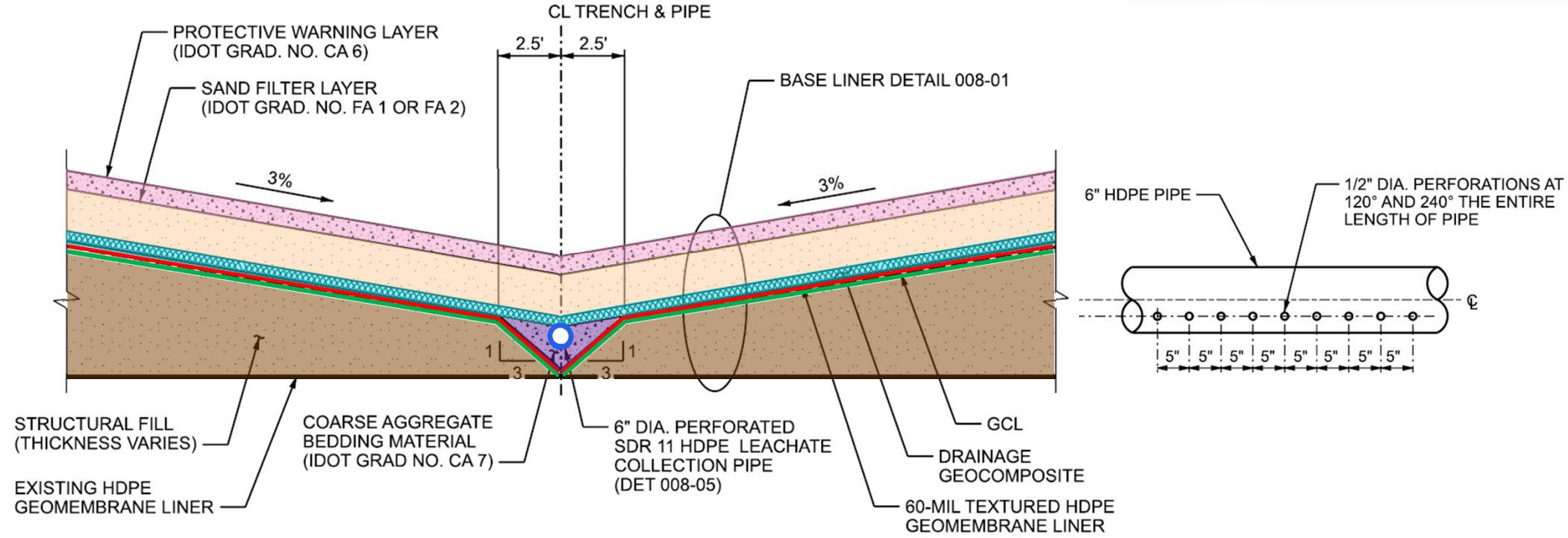
- Preliminary Selected Remedy is a combination of:
  - Alternative #1: Capping ASB Weir Wall
  - Alternative #2: Basin Retrofit
  - Alternative #4: Monitored Natural Attenuation

Preliminary Selected Remedy

- Capping Ash Surge Basin Weir Wall
  - Removal of existing batten bar attachments
  - Weld new geomembrane liner section over top of weir wall
  - Anchor to exterior of weir wall



Preliminary Selected Remedy: Retrofitted Liner/Leachate Collection System Design

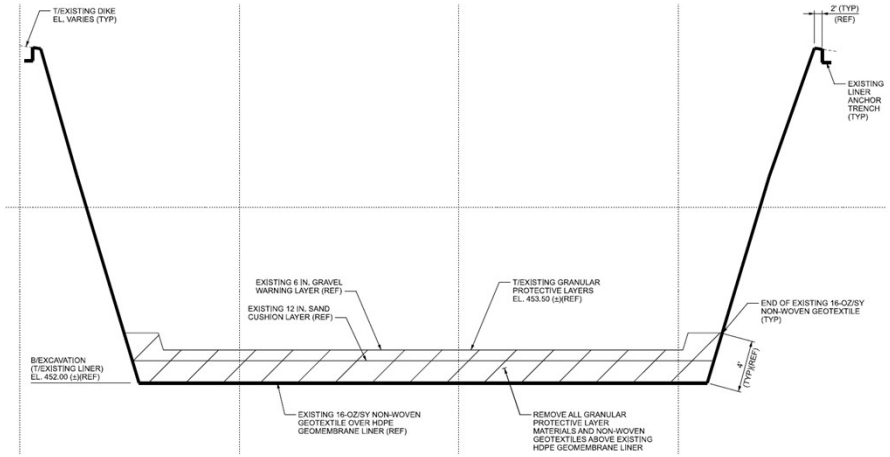


Component	Layer / Feature	Description	Reference(s)
Basin Floor	Structural Fill	Fill material to establish 3% slope for LCRS	845.420(a)(3)
Composite Liner System	Geosynthetic Clay Liner (GCL)	Bottom component of new composite liner system	845.410(a) & (b) 845.400(c)
	60-mil HDPE Geomembrane Liner	Top component of new composite liner system	845.410(a) & (b) 845.400(c)
Leachate Collection & Removal System (LCRS)	Drainage Geocomposite	Directs leachate to leachate collection pipe	845.420(a)(4)(B)
	Perf. HDPE Leachate Collection Pipe	Collects and directs leachate to discharge pipe or sump pump	845.420(a)(7)
	Coarse Aggregate Bedding Material	Prevents finer particles from clogging the leachate collection pipe	845.420(a)(6)
	Sand Filter Layer	Limits intrusion of finer CCR particles into LCRS	845.420(a)(2)
	Protective Warning Layer	Protects liner and LCRS components	845.420(a)(8)

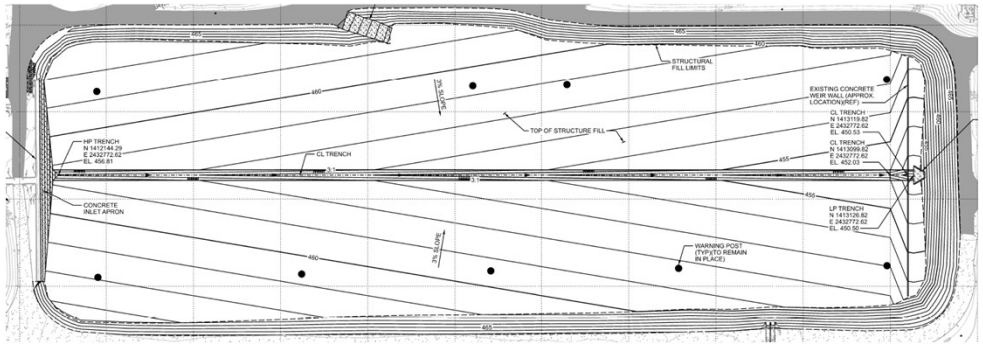
Retrofitted Basins – Preliminary Design

Ash Surge Basin

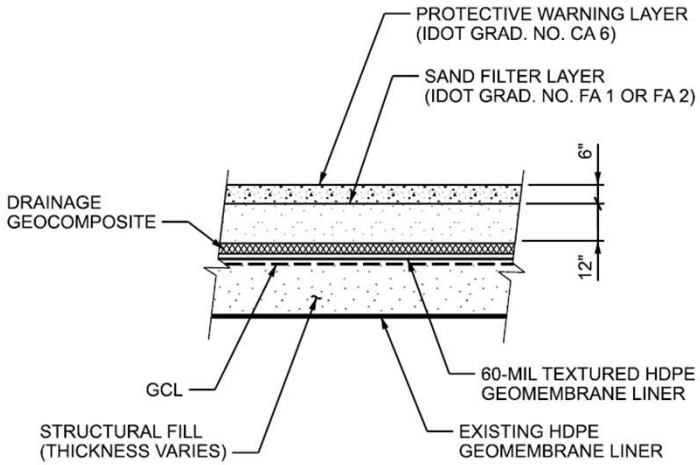
1. Material Removal & Decontamination



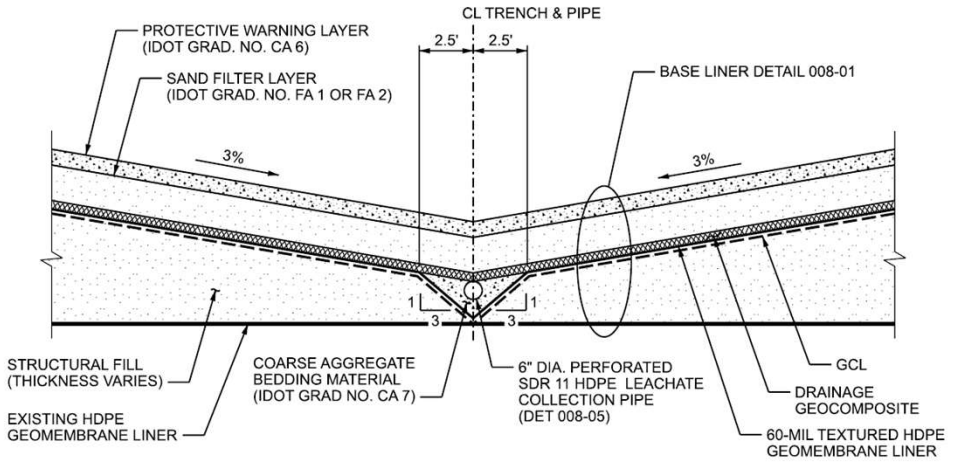
2. Place Structural Fill



3. Install New Composite Liner



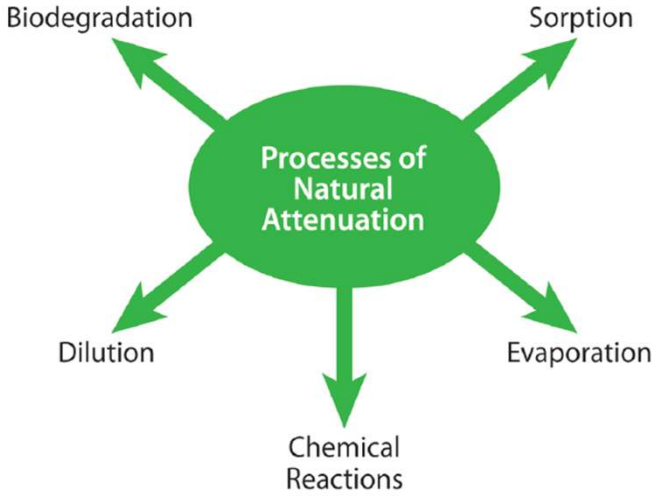
4. Install New Leachate Collection System



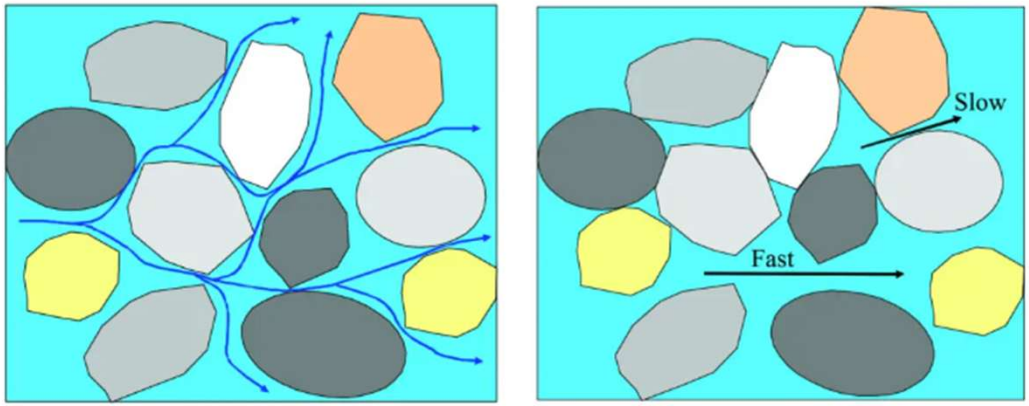
TYPICAL SECTION AT LEACHATE COLLECTION TRENCH

Preliminary Selected Remedy

- Monitored Natural Attenuation (MNA)
  - Retrofit composite liners effectively stop seepage (i.e., source)
  - Stable/downward trends
  - Relies on natural groundwater processes
  - Tracked with on-going groundwater monitoring
  - Groundwater monitoring required during operation phase and post-closure



Dispersion of contaminant at the scale of individual grains in an aquifer



Tortuous routes among grains; some routes are short, some are long.

Differences in pore sizes between grains means some flow will be faster.

The combination of grain-scale dispersion means that some molecules of contaminant will move ahead faster than others, and some will move sideways, resulting in expansion of the plume.

Groundwater Modeling

To comply with the Illinois CCR Rule and support the Draft Corrective Action Plan, modeling of the groundwater concentrations was performed. The purpose of the groundwater modeling is to demonstrate the effectiveness of the proposed draft remedy relative to achieving GWPS.

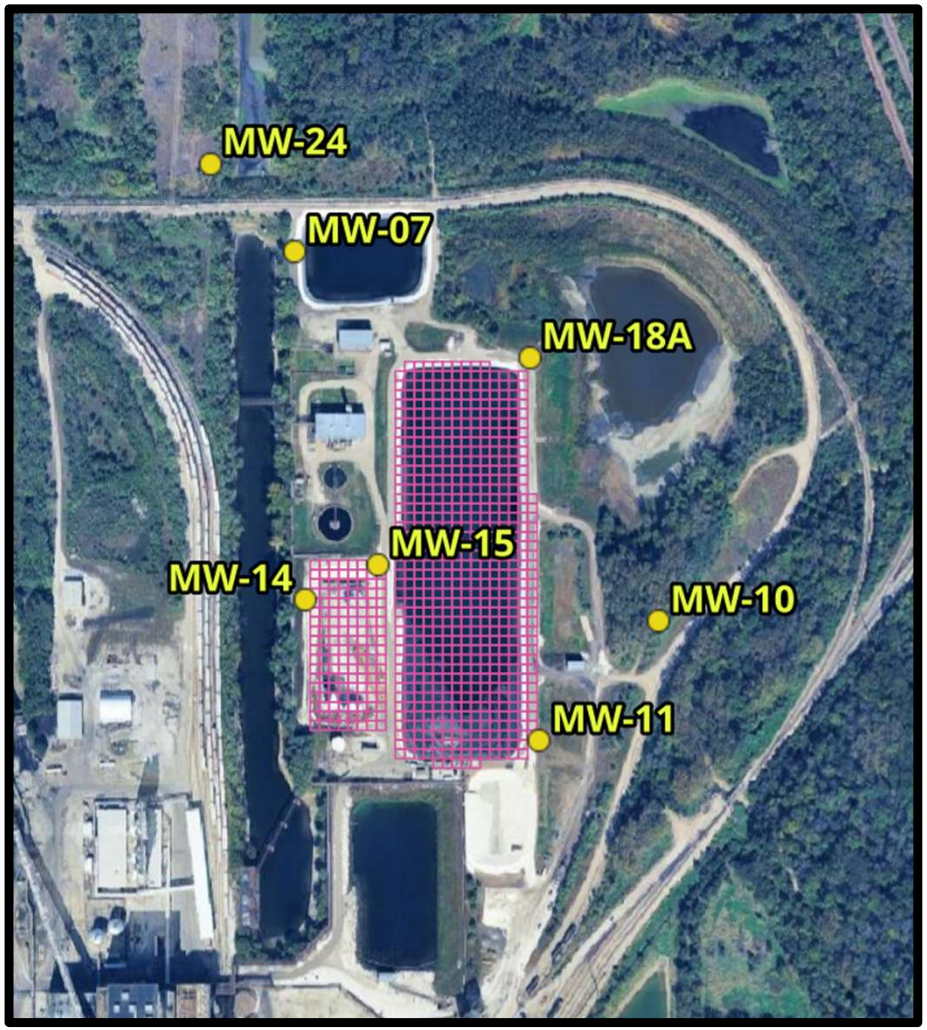
To accomplish this, the model establishes a conservative, **WORST-CASE** theoretical source of contamination (i.e., not an actual source) from the units, which established hypothetical baseline conditions.

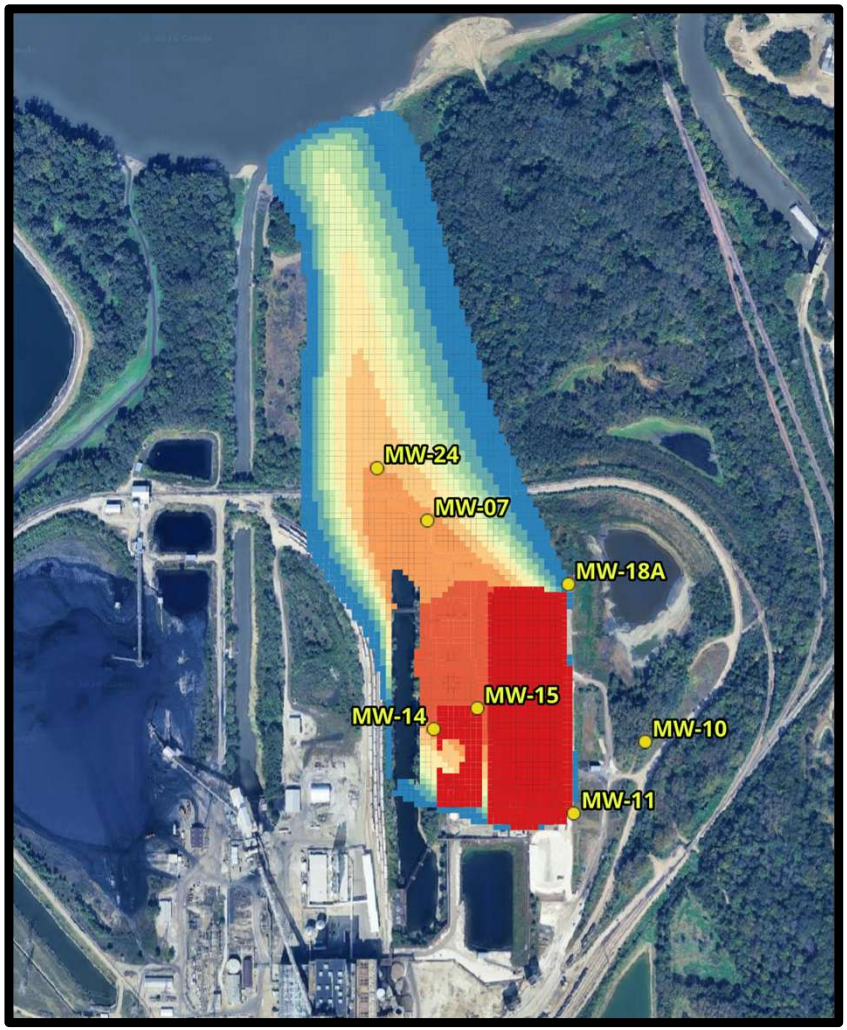
The model evaluates theoretical, potential contamination emanating from the CCR units – it conservatively assumes the ponds have ash and water and that the (existing) liner is compromised/non-existent since the upgraded liners were installed approximately 15 years ago.

After establishing the above baseline conditions, the groundwater remedy can be overlain and the model is then run over an extended time sequence to evaluate the change/improvement in groundwater quality resulting from the remedy.

Theoretical Modeling Baseline Simulation

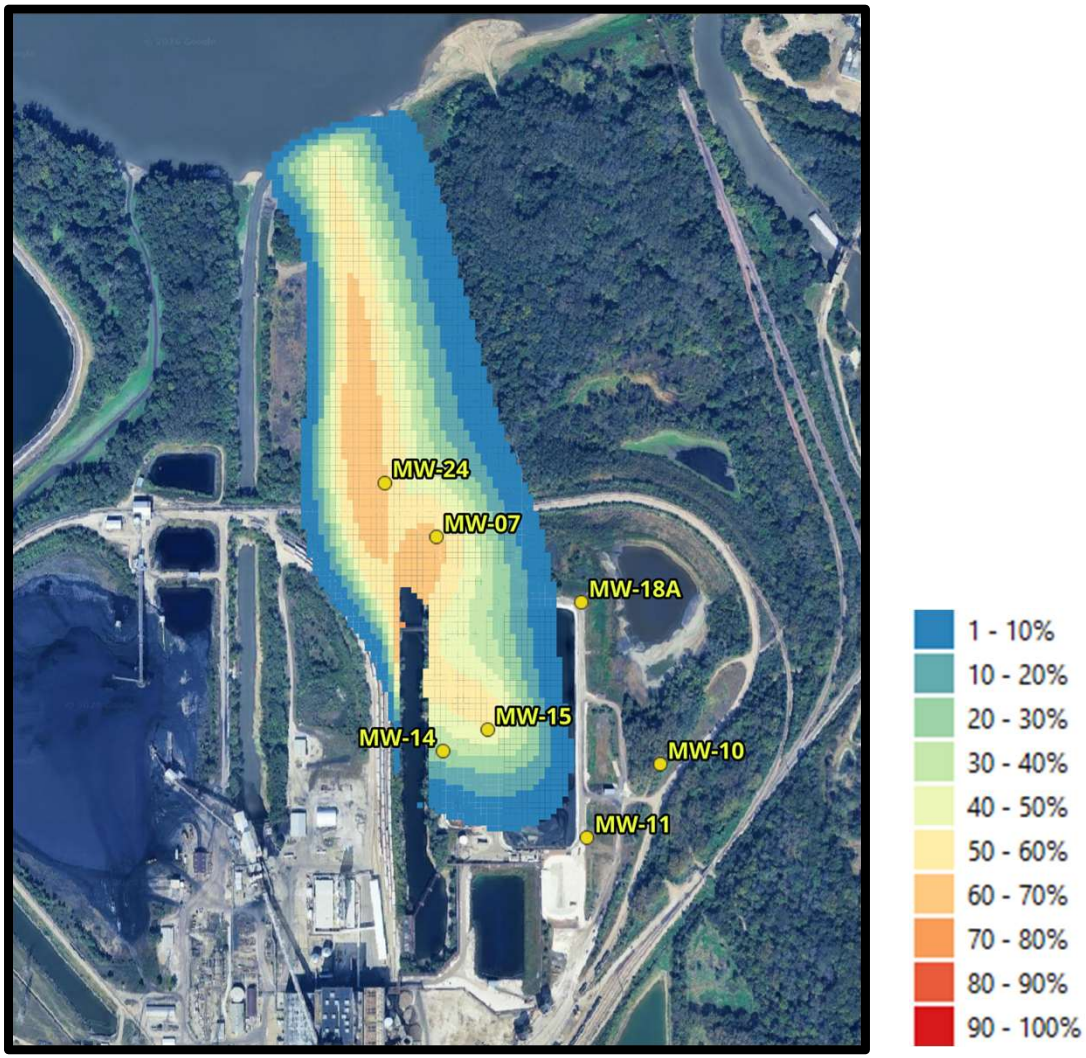
- Hypothetical source beneath MCB and ASB
- Hypothetical starting point (for modeling only)



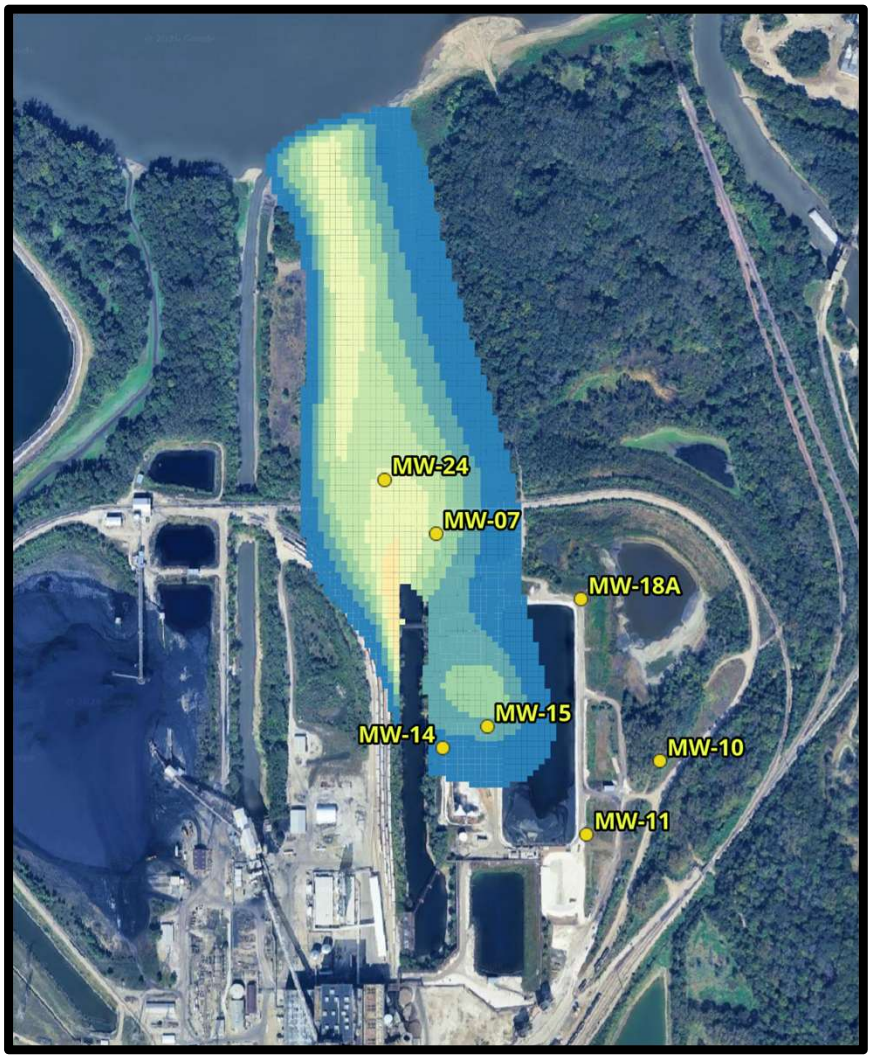


Implementation of Remedy Scenario

- 5-year modeled distribution

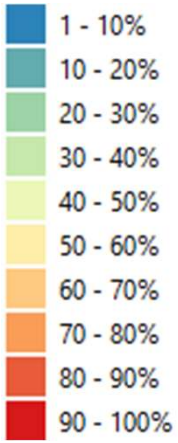


- 10-year modeled distribution



Implementation of Remedy Scenario

- 25-year modeled distribution

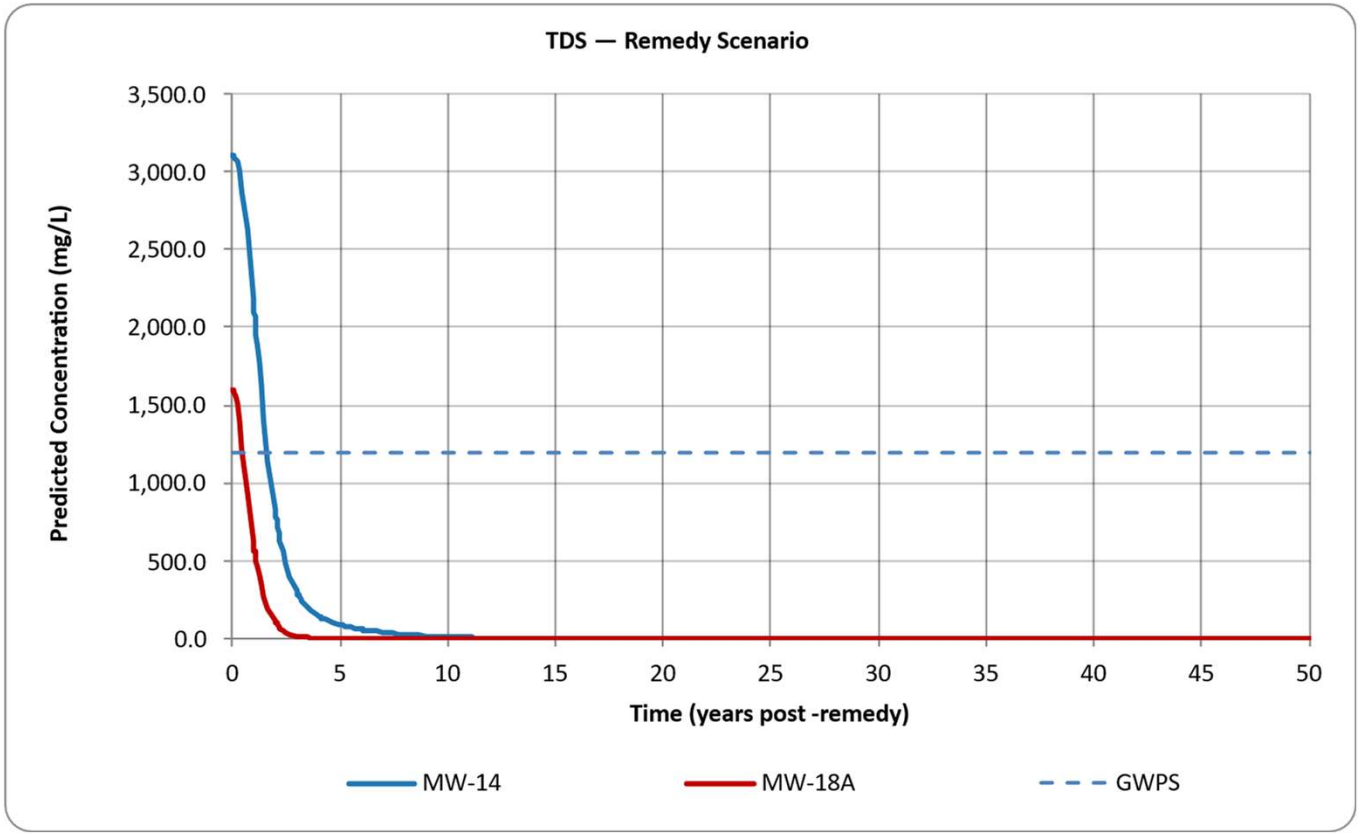


- 50-year modeled distribution

Implementation of Remedy Scenario: Predicted Concentrations vs. Time

- Well Locations

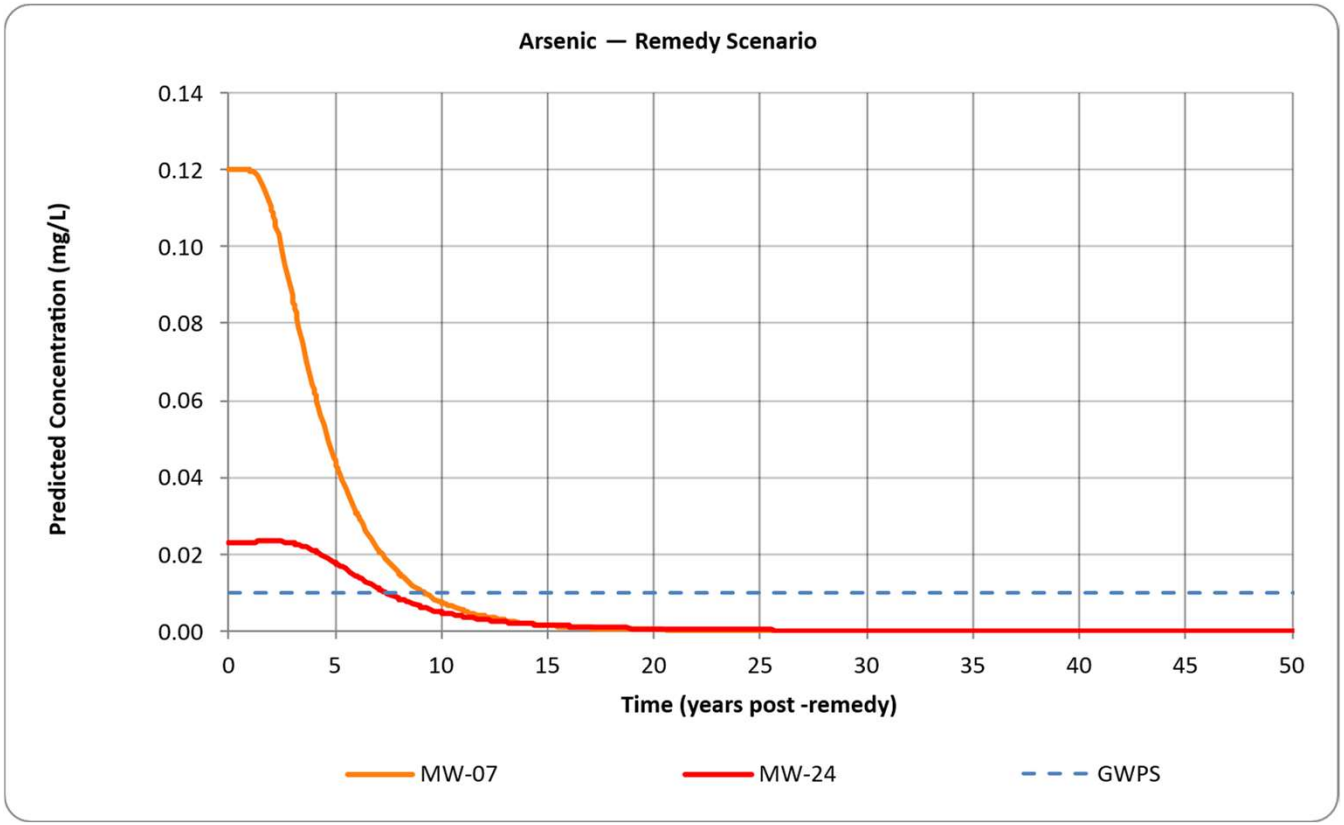
- TDS Concentration vs. Time



Implementation of Remedy Scenario: Predicted Concentrations vs. Time

- Well Locations

- Arsenic (total) Concentration Vs. Time



MWG
Midwest Generation, LLC

Preliminary Corrective Action Schedule

- MWG estimates that after receipt of a construction permit from Illinois EPA, it will take approximately 7-8 months to retrofit the Metal Cleaning Basin and approximately an additional 12-13 months to retrofit the Ash Surge Basin. More detailed planning level schedules are included the CAP.

- Once retrofitted, the Metal Cleaning Basin may be used to treat boiler wash waters and/or for temporary storage of ash and the Ash Surge Basin may be used to store CCR remaining in the decant water from the Station's hydrobins.

- Groundwater monitoring will continue during the operating life and required post-closure care period for the retrofitted units.

Public Website:
midwestgenerationllc.com

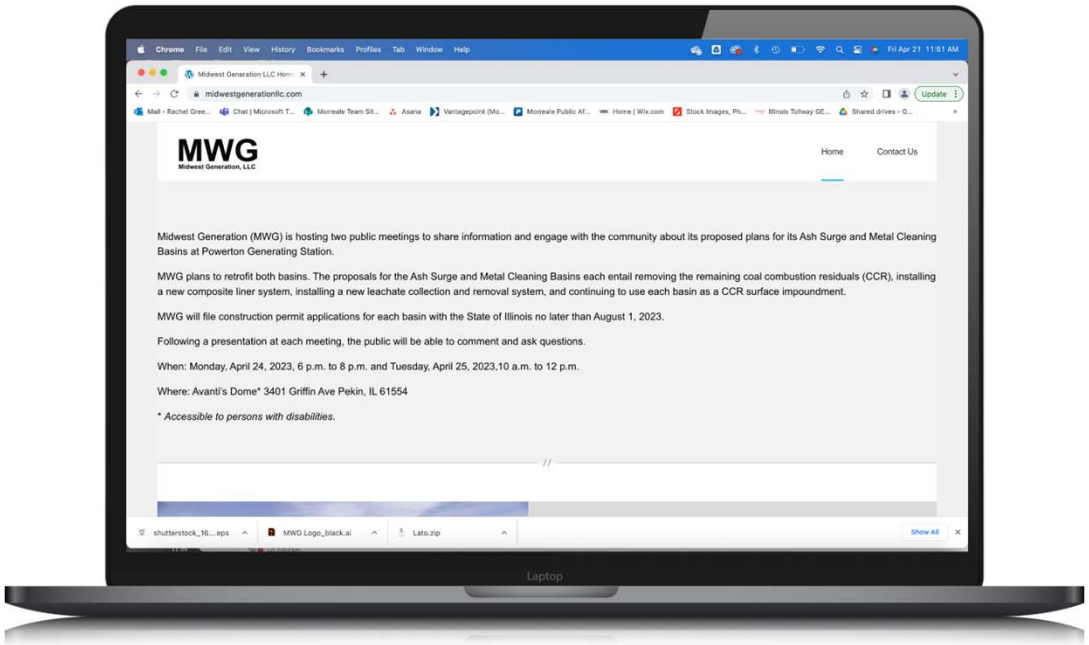


Exhibit F:

Summary of public meetings

Midwest Generation, LLC
Powerton Generating Station
Ash Surge Basin and Metal Cleaning Basin Groundwater Corrective Action
Public Meeting General Summary

INTRODUCTION

In accordance with Title 35 of the Illinois Administrative Code ("35 IAC") Section 845.240, Midwest Generation, LLC (MWG) posted the public meeting notice for groundwater corrective action at Powerton Generating Station's Ash Surge Basin and Metal Cleaning Basin on its publicly available website and provided a copy of such notice to the Illinois Environmental Protection Agency (Illinois EPA or Agency) to email to its listserv for this facility. The public meeting notice was also mailed to all residents within two miles of the facility on June 5, 2026, which totaled 1,126 residential mailing addresses. The notice was also posted in 27 public locations within 10 miles of the facility boundary.

The public meetings for Powerton Generating Station's Ash Surge Basin and Metal Cleaning Basin were held on July 6, 2026 from 6:00 p.m. to 8:00 p.m. and on July 7, 2026 from 10:00 a.m. to 12:00 p.m. The meetings were held in person. Six members of the public attended the July 6th meeting. Five members of the public, including one who attended the previous meeting, attended the July 7th meeting. The remaining attendees were MWG affiliate employees and consultants. Attendees who wished to sign up for a copy of the meeting summary and/or be added to Illinois EPA's listserv for the facility were asked to sign up via a form provided at the meeting. Ten attendees requested a copy of the meeting summary and transmittal of their email address to the Agency to be added to the Agency's listserv for the facility. All email addresses received will be transmitted to the Agency. After an introduction and approximate 60-minute presentation on the proposed groundwater corrective action plans, the public was given approximately 1 hour during each meeting to ask questions and provide comments.

This document serves as a summary of the issues and questions raised during the meeting.

MWG proposes a corrective action plan that includes the following remedies: (1) redesigning the geomembrane attachment to the Ash Surge Basin weir wall, (2) retrofit both the Ash Surge Basin and Metal Cleaning Basin by removing the remaining material in the basin, retaining and decontaminating the existing geomembrane liner as an additional protective layer under the new composite liner system, and installing a new composite liner system and leachate collection and removal system, and (3) monitored natural attenuation.

SUMMARY OF ISSUES AND QUESTIONS RAISED DURING THE MEETINGS

Retrofit Design and Process

Questions were asked about the repair process and longevity of the liners. The HDPE geomembrane liner and geosynthetic clay liner materials proposed to be used in the retrofit plans are designed to meet the standards outlined by the U.S. Environmental Protection Agency and Illinois EPA in their respective CCR Rules. When initially constructed and during any repairs, the seams of the liner are welded together, followed by rigorous testing of the welds prior to use, as required by the construction quality assurance program prescribed in the IL CCR Rule. These liners are used in many environmental applications across the country and ongoing research estimates these geosynthetic materials, which will be covered, can last hundreds of years.

Questions were asked about the leachate collected after the retrofit and how it is treated. Leachate collected after the retrofit of the ponds will be treated in the onsite wastewater treatment system, which consists of chemical and physical treatment, before it is discharged via the Powerton Station's NPDES permit.

A question was asked about ash handling during the retrofit process. Any ash that is removed from the pond during the retrofit construction process will be dewatered and sent off-site to a permitted landfill or a beneficial use site located in Canton, IL.

A question was asked whether there is ash located under the liner of the Metal Cleaning Basin and voiced concern that groundwater may be in contact with bottom of the basin at times. While some slag was beneficially used as structural fill in the berms of the basin, the material under the liner and poz-o-pac layer is native soil material. The base elevation of the Metal Cleaning Basin is 457.5 ft above mean sea level (amsl) and the upper limit groundwater elevation is 450.14 ft amsl, which is greater than the 5-foot minimum separation required by the IL and US EPA CCR Rules.

Groundwater Monitoring and Modeling

A question was asked whether the groundwater modeling took river level fluctuations into account and whether there is a mixing zone extending under the entire facility. The groundwater modeling of the river was set at an average level, based on the monthly level measurements collected as required by the IL CCR Rule. The mixing zone between river water and groundwater does not extend under the entire facility and is limited to the northernmost portion of the monitoring network.

A question was asked how high the river level must be before the groundwater levels rise to reach the bottom of the basins. The base of the Metal Cleaning Basin is approximately 450.14 feet amsl. The base of the proposed retrofit liner for the Ash Surge Basin is approximately 450.50 feet amsl. The estimated last 10-year average for the stage of the Illinois River, based on concurrent

measurements at the U.S. Geological Survey gauge station at Kingston Mines and those from northern-most site monitoring wells (i.e., wells closest to river), is 435.26 feet amsl. The Illinois River stage would need to rise at least 15 feet and maintain that elevation for this scenario to occur. There is no indication or evidence that such a large, sustained increase in river stage would occur.

A question was asked whether the Mohamet aquifer has been analyzed for comingling with the groundwater near the ash basins. MWG has not completed a specific evaluation of the Mohamet aquifer because monitoring shows that any groundwater impacts have been localized within the facility boundaries with discharge into the Illinois River which is a regional hydrogeologic boundary. The impacts will not affect the existing overall water quality of the Mohamet Aquifer.

A question was asked about a potential arsenic source other than the Metal Cleaning and Ash Surge Basins. The boring log for monitoring well MW-24 located on the west side of the former intake channel noted some ash in the boring column. That ash was placed long ago before any environmental regulations existed. US EPA's Legacy CCR Rule was designed to address areas like these.

A question was asked if elevated levels of heavy metals are still being observed and where one could find groundwater trends. All groundwater data is posted on our public website, www.midwestgenerationllc.com, in a tabular format on a quarterly basis. The groundwater data is showing stable to improving conditions at this time.

A question was asked about future groundwater monitoring. Groundwater monitoring will continue throughout the operating life of the basins, as well as throughout the post-closure care period once the basins are closed. The post-closure care period lasts a minimum of three years for closure by removal and a minimum of thirty years for closure in place. Once the required post-closure care monitoring has been completed, the owner or operator of a CCR surface impoundment must request Illinois EPA approval to terminate post-closure care. The Illinois EPA will continue to have oversight for CCR surface impoundments until the Agency agrees that its oversight is no longer necessary.

Groundwater Corrective Action Plan

A question was asked to further explain monitored natural attenuation (MNA). MNA is a remediation method that uses natural processes to decrease the concentration of contaminants in the environment. It uses in-situ physical, chemical, and biological processes that occur naturally in the environment. MNA works best when used in conjunction with an active corrective action, such as the basin retrofits MWG is proposing here.

A question was asked whether we could use electronic leak detection on a periodic basis to determine liner system integrity as opposed to going through the remedies proposed during the meeting. The electronic leak detection works best when the basin is emptied, which occurs every 1-2 years. The IL CCR rule prescribes that quarterly groundwater sampling detects any potential

leak and requires a corrective action process that all CCR impoundment owners/operators must follow when a groundwater protection standard is exceeded. MWG is following that process, which includes the corrective measures alternatives analysis, presentation of proposed remedies to the public, and submittal of a groundwater corrective action plan via a corrective action construction permit application for Illinois EPA review and approval.

A comment was made that the corrective action alternative analysis showed a similar benefit between closure by removal and retrofit of the Metal Cleaning and Ash Surge Basins. Powerton is an operating electric generating facility, and at this time both basins are needed to ensure electric generating operations can continue reliably. Once electric generation ceases at Powerton, closure construction permit applications will be submitted to Illinois EPA for the retrofitted basins.

NPDES Permit

A question was asked about the NPDES permitted outfalls and where they are located. There are two permitted outfalls that discharge to the Illinois River and two permitted outfalls that discharge to Powerton Lake.

A question was asked whether water analysis is performed at Powerton Lake. MWG does not study Powerton Lake. Instead, we monitor our discharges to the Illinois River and Powerton Lake and report those to the Illinois EPA as required by the Station's NPDES permit.

Ash Handling

Questions were asked about the ash handling process at the Station. Ash is sluiced from the boilers to hydrobins, which are dewatering bins that allow the overwhelming majority of ash to settle out while the water is decanted to an ash basin for further settling (polishing) before discharge via the NPDES permit. The bulk ash remaining in the hydrobins is removed and either beneficially reused or sent to a permitted landfill for disposal.

A question was asked about the current status of the CCR basins at the Station. The Ash Bypass Basin has been retrofitted in accordance with the IL CCR Rule and is in service. It is used to settle any ash remaining in the decanted sluice water after the significant majority of ash is removed in the hydrobins. The Ash Surge Basin is out of service. The Metal Cleaning Basin is used occasionally to collect and treat boiler cleaning wash waters during boiler outages, and to temporarily store ash from maintenance activities outside of boiler outages. The Former Ash Basin (FAB) is an inactive basin that has not been used since the 1970's. MWG submitted a closure construction permit application for the FAB which is under review by Illinois EPA.

A question was asked if there is analysis of the ash from the ash basins. Ash from each basin was analyzed in accordance with the IL CCR Rule. The results of that sampling can be found in the Initial Operating Permit applications, available at www.midwestgenerationllc.com.

A question was asked about wildlife interaction with the ash basins. On occasion, wildlife such as birds or turtles are seen in or around the basins. No adverse effects to the animals have been observed.

Future

General concerns were raised about potential future impacts to the ponds due to climate change, such as groundwater level fluctuations and flooding, historic fill, and impacted soils under the basins. During the useful life of the impoundments and throughout the closure and post-closure care periods (if applicable), groundwater monitoring will continue, which includes monitoring and reporting the groundwater levels in the monitoring wells. Additionally, the impoundments will continue to be inspected weekly by qualified staff and annually by a certified Professional Engineer. MWG has no evidence of any sustained long-term rise in water levels around the impoundments at Powerton Station.

A question was asked about MWG's plans to address historical deposits of ash in light of EPA proposing revisions to the rule originally published in 2024. MWG reviews and evaluates all federal and state rules that are or may be applicable to its facilities and will continue to follow the laws and regulations while prioritizing the community, the environment, and the well-being of our employees.

SUMMARY OF REVISIONS, CHANGES, AND CONSIDERATIONS

Public engagement is an important part of the permitting process. Midwest Generation, LLC valued the opportunity to hear and consider the comments of community members and others who participated in the public meetings. At this time, Midwest Generation is proceeding with the proposal for corrective action at the Ash Surge Basin and the Metal Cleaning Basin as presented at the public meetings. Taking public comments into consideration, the current analysis continues to indicate that the proposed plan – which remains subject to regulatory review and approval – prioritizes the environment and community well-being.