

**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.