

**TRANSMITTAL**

To: Illinois Environmental Protection Agency  
DWPC – Permits Section (MC 15)  
Attn: Part 845 Coal Combustion Residual Rule Submittal  
2520 W Iles Ave  
Springfield, IL 62704

Date: January 30, 2025

From: Midwest Generation, LLC – Powerton Station

**Re: Midwest Generation, LLC – Powerton Generating Station  
Account No. W1798010008  
CCR Surface Impoundment Annual Consolidated Report**

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In accordance with the requirements of Title 35 of the Illinois Administrative Code (“35 IAC”) Section 845.550, the Annual Consolidated Report is attached for the following CCR surface impoundments at Powerton Generating Station:

Pond ID	CCR Surface Impoundment Description
W179801008-01	Ash Surge Basin
W179801008-04	Bypass Basin
W179801008-03	Metal Cleaning Basin
W179801008-05	Former Ash Basin

The certification pages from the Hazard Potential Classification Assessments, Structural Stability Assessments, Safety Factor Assessments, and Inflow Design Flood Control System Plans have been provided in Attachment B. A full copy of these assessments can be found on our public website at [www.midwestgenerationllc.com](http://www.midwestgenerationllc.com). If you have any questions or require additional information regarding this submittal, please contact Jill Buckley at [Jill.Buckley@nrg.com](mailto:Jill.Buckley@nrg.com).

# **2024 ANNUAL CONSOLIDATED REPORT POWERTON GENERATING STATION**

**ASH SURGE BASIN – W1798010008-01**

**BYPASS BASIN – W1798010008-04**

**METAL CLEANING BASIN – W1798010008-03**

**FORMER ASH BASIN – W1798010008-05**

**ATTACHMENT A – ANNUAL CCR FUGITIVE DUST CONTROL REPORT**

**ATTACHMENT B – ANNUAL INSPECTION REPORT**

**ATTACHMENT B.1 – HAZARD POTENTIAL CLASSIFICATION ASSESSMENT**

**CERTIFICATION**

**ATTACHMENT B.2 – STRUCTURAL STABILITY AND SAFETY FACTOR**

**ASSESSMENT CERTIFICATION**

**ATTACHMENT B.3 – INFLOW DESIGN FLOOD CONTROL PLAN**

**ATTACHMENT C – ANNUAL GROUNDWATER MONITORING AND CORRECTIVE  
ACTION REPORT**

**ATTACHMENT D – MONTHLY SURFACE IMPOUNDMENT WATER ELEVATIONS**

**ATTACHMENT A**  
**2024 ANNUAL CCR FUGITIVE DUST**  
**CONTROL REPORT**

# **Annual CCR Fugitive Dust Control Report**

**Powerton Generating Station**

13082 East Manito Road, Pekin, Illinois

## **1.0 *Introduction***

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On April 15, 2021, the Illinois Pollution Control Board adopted a new part of its waste disposal regulations creating state-wide standards for the disposal of coal combustion residuals (CCR) in surface impoundments, created by the generation of electricity by coal-fired power plants (the IL CCR Rule). These requirements include air criteria specified in Title 35 of the Illinois Administrative Code, §845.500, to address the potential pollution caused by windblown dust from CCR units.

The Powerton Generating Station, operated by Midwest Generation, LLC (MWG), is a coal-fired power plant located 13082 East Manito Road, Pekin, Tazewell County, Illinois. The facility is a coal-fired electric power generating station occupying approximately 1,710 acres. Units 5 and 6 began operating in 1972 and 1975, respectively. Electrical power is transmitted from the site to the area grid through overhead transmission power lines. The Rule applies to this facility due to the management of CCR that is generated from the combustion of coal. CCR units associated with the station include the Ash Surge Basin, Bypass Basin, Metal Cleaning Basin, and Former Ash Basin.

According to the IL CCR Rule, owners or operators of CCR units must adopt measures that will effectively minimize CCR from becoming airborne at the facility by developing and operating in accordance with a Fugitive Dust Control Plan (Plan) with adequate dust control measures. In this regard, a Plan was prepared that complies with the requirements as specified in §845.500(b)(1-7) of the IL CCR Rule and placed in the Powerton facility's operating record on October 31, 2021 per §845.800(d)(7). As required, the Plan was also posted to the publicly accessible internet site per §845.810(e).

In addition to the above and per §845.500(c), an Annual Fugitive Dust Control Report (Annual Report) must be completed that includes the following:

- Description of actions taken to control CCR fugitive dust and
- The four quarterly fugitive dust complaint reports submitted under subsection (b)(2)(B)

The Annual Report must be submitted as part of the annual consolidated report required by §845.550. This document represents the 2024 Annual Report for Powerton and will also be appropriately placed in the facility's operating record per §845.800(d)(7) and posted to the publicly accessible internet site per §845.810(e).

# **Annual CCR Fugitive Dust Control Report**

**Powerton Generating Station**

13082 East Manito Road, Pekin, Illinois

## ***2.0 Actions Taken to Control CCR Fugitive Dust***

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As detailed in the CCR Fugitive Dust Control Plan (Plan) and reiterated below, the station has established procedures and inspection requirements which are implemented to minimize/eliminate airborne emissions from the potential fugitive dust sources. The results from inspections conducted and associated observations made during CCR handling activities are documented on logs maintained in the station's Environmental Department.

### ***2.1 Bottom Ash and Slag Distribution System***

Bottom ash and slag are in a liquid mixture within a closed system until the point of discharge at the dewatering bins. A significant portion of the piping system is contained within a building, which eliminates the potential for dust emissions to the outside environment. Also, the bottom ash and slag have sufficient moisture to preclude this material from becoming airborne. An assessment of the exterior distribution system is performed on a quarterly basis to verify the integrity of the system or when a breach in the system is detected. If a leak is noted, the affected area is restored to original conditions and repair of the pipe will be performed as soon as feasible. The ash is then sent off site to a mine reclamation site.

### ***2.2 Dewatering Bins***

The bottom ash and slag are drop loaded from the dewatering bins in a wet state and into trucks positioned beneath the bins. The bottom ash and slag have sufficient moisture to preclude this material from becoming airborne during loading. An assessment of the dewatering bin loading operations is performed on a quarterly basis to verify if there has been an equipment malfunction resulting in an accumulation of released material. Should there be a malfunction in the dewatering equipment, repair of any malfunctioning equipment and clean up and transfer of the material to the concrete storage pit is performed as soon as feasible.

### ***2.3 Ash Surge Basin, Bypass Basin, and Metal Cleaning Basin***

During normal operations, the Ash Surge Basin and Bypass Basin contain water thereby suppressing any potential fugitive dust emissions. The Ash Surge Basin has been taken out of service. The Metal Cleaning Basin has recently been emptied and cleaned thereby suppressing any potential fugitive dust emissions. Infrequently, the basins need to be dewatered and the sediment removed for proper off-site disposition. While the bottom ash and slag residue is drying, there is the potential for this material to become airborne especially during excessively dry and windy conditions. Loading of this material under these conditions also has the potential for generating fugitive dust. Dewatered basins are assessed on a quarterly basis or more frequently during excessively dry and windy conditions. To minimize fugitive dust emissions

# **Annual CCR Fugitive Dust Control Report**

**Powerton Generating Station**

13082 East Manito Road, Pekin, Illinois

from exposed dry bottom ash and slag, the height of the staged material is minimized and the material piles are either sprayed with water or covered. Loading activities are also limited during such occasions. If necessary, haul trucks are covered with tarps once they have been loaded.

## ***2.4 Former Ash Basin***

The Former Ash Basin was used for the disposal of bottom ash and slag in the past; however, this procedure is no longer occurring. The previously deposited material is completely submerged within the basin with the typical water level at approximately 10-15 feet below grade, thereby, making the bottom ash and slag not readily susceptible to wind erosion and generation of potential fugitive dust emissions.

## ***2.5 Concrete Storage Area***

The concrete storage area contains ash and slag and other ash-related materials generated from routine plant maintenance activities. These materials are in a wet state but are allowed to partially dry to facilitate removal. When sufficiently dry, the material is removed off site. The concrete area is assessed on a quarterly basis or more frequently during excessively dry and windy conditions. To minimize fugitive dust emissions from exposed dry bottom ash and slag and other ash-related materials, the material is kept wet.

## ***2.6 Fly Ash Equipment***

Fly ash from the mechanical separators is sent to the silos within an enclosed structure. The fly ash is drop loaded through a telescopic pipe contained within a drop chute into an opening within the tarp covering the truck trailer. This loading mechanism minimizes the potential for fly ash to become airborne during the loading process. The loading of trucks also occurs within a partial enclosure. At the completion of loading but prior to leaving the enclosure, the top, sides and rear of each truck trailer is sprayed with water. During times when temperatures are below freezing, the tarps are broom swept at the truck stand to remove any accumulated fly ash. Accumulated ash is promptly transferred to the concrete storage pad. Occasionally, the fly ash silos are required to be emptied so that fly ash does not harden inside the silo. In order to empty a silo, a vacuum truck is used to pull material out of the silo and into the truck.

This process is covered by the facility's fugitive dust operating program. Under the program, the facility must maintain control measures, including enclosures, covers and dust collection devices. Additionally, the facility is required to conduct weekly inspections of the process to confirm compliance. A record of the inspections is maintained at the facility.

## **Annual CCR Fugitive Dust Control Report**

**Powerton Generating Station**

13082 East Manito Road, Pekin, Illinois

### ***2.7 Ash Transport Roadways***

Truck drivers are instructed on the proper procedure for cleaning trucks and a vehicle speed limit is enforced at the facility. Ash material that may not have been adequately removed from the trucks has the potential to become airborne and ultimately be deposited on haul roads. To minimize fugitive dust emissions, these roads are assessed on a quarterly basis and any observed accumulated ash material is promptly cleaned up and collected for off-site removal.

### ***3.0 Fugitive CCR Dust Assessments***

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Pursuant to §845.500(b)(3), assessments of the potential fugitive dust emission sources identified in the Powerton facility's CCR Fugitive Dust Control Plan (Plan) are conducted to assess the effectiveness of the Plan. The assessment includes observation of ash removal from ponds, temporary storage and transport activities at the facility to confirm the adequacy of the control measures. The assessments are conducted on a quarterly basis by an individual designated by the contact identified below. Observations made during each assessment are recorded on a form similar to the one included in Appendix B of the Powerton facility's CCR Fugitive Dust Control Plan.

If the results of the assessment determine that ash-related equipment has malfunctioned or the integrity of the equipment has been compromised, the necessary repairs or replacement are performed as soon as feasible. If the assessment finds that the Plan does not effectively minimize the CCR from becoming airborne, the Plan is amended to include additional control measures. No issues were identified during this Annual Report's period of record covering January through December 2024.

#### **Owner Representative/Responsible Person Contact Information:**

Mr. Todd Mundorf  
Plant Manager  
309-477-5212

### ***4.0 Record of Citizen Complaints***

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Per the Rule, the Annual Report must include copies of the four quarterly fugitive dust complaint reports submitted under §845.500(b)(2)(B). The quarterly fugitive dust complaint reports contain a record of all citizen complaints that were received by the Powerton station with regard to fugitive dust emission incidents. In line with established protocols and within 24 hours of

## **Annual CCR Fugitive Dust Control Report**

**Powerton Generating Station**

13082 East Manito Road, Pekin, Illinois

receipt, the station's environmental coordinator enters the citizen complaint into MWG's Environmental Management Information System (EMIS) database. The EMIS database then automatically forwards notice of the complaint to the station manager and MWG's corporate environmental department. Following initial evaluation of the complaint, MWG then conducts a thorough investigation to confirm the reported incident/conditions and implement corrective actions as may be warranted.

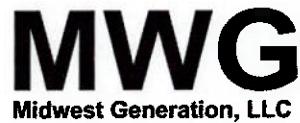
No complaints regarding CCR fugitive dust emissions at the facility were registered during this Annual Report's period of record covering January through December 2024.

### ***5.0 Summary of Corrective Actions Taken***

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For the January through December 2024 period of record and based on continued monitoring and inspections as outlined in Section 2.0 and 3.0 and as required under the CCR rules, the currently established control measures remain effective in minimizing potential fugitive dust emissions. Moreover, this assertion is further validated by the lack of citizen complaints logged over this same period. Accordingly, no corrective actions were required during the past year.

**QUARTERLY FUGITIVE DUST  
COMPLAINT REPORTS**



**Midwest Generation, LLC**  
Powerton Generating Station  
13082 E. Manito Road  
Pekin, Illinois 60087

April 4, 2024

Illinois Environmental Protection Agency  
DWPC – Permits Section (MC 15)  
Attn: Part 845 Coal Combustion Residual Rule Submittal  
1021 North Grand Avenue East  
Springfield, IL 62702

**Re: Midwest Generation, LLC – Powerton Generating Station  
Account No. W1798010008  
Pond IDs: W1798010008-01, W1798010008-03, W1798010008-04, W1798010008-05  
CCR Surface Impoundment Quarterly Fugitive Dust Complaint Report**

Dear Sir or Madam:

In accordance with the requirements of Title 35 of the Illinois Administrative Code ("35 IAC") Section 845.500(b)(2)(B), this letter serves as the fugitive dust complaint report for First Quarter 2024 at Powerton Generating Station. There were no complaints received from members of the public during the period January 1, 2024 through March 31, 2024.

If you have any questions or require additional information regarding this submittal, please contact Jill Buckley at [jill.buckley@nrg.com](mailto:jill.buckley@nrg.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Mundorf".

Todd Mundorf  
Plant Manager  
Powerton Generating Station



July 9, 2024

**Midwest Generation, LLC**  
Powerton Generating Station  
13082 E. Manito Road  
Pekin, Illinois 60087

Illinois Environmental Protection Agency  
Compliance Assurance Section  
Bureau of Water  
1021 North Grand Avenue East  
Springfield, IL 62702

**Re: Midwest Generation, LLC – Powerton Generating Station**  
**Permit No. 2024-CO-100029**  
**Account No. W1798010008**  
**Pond IDs: W1798010008-01, W1798010008-03, W1798010008-04, W1798010008-05**  
**CCR Surface Impoundment Quarterly Fugitive Dust Complaint Report**

Dear Sir or Madam:

In accordance with the requirements of Title 35 of the Illinois Administrative Code ("35 IAC") Section 845.500(b)(2)(B), this letter serves as the fugitive dust complaint report for Second Quarter 2024 at Powerton Generating Station. There were no complaints received from members of the public during the period April 1, 2024 through June 30, 2024.

If you have any questions or require additional information regarding this submittal, please contact Jill Buckley at [jill.buckley@nrg.com](mailto:jill.buckley@nrg.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Todd Mundorf".

Todd Mundorf  
Plant Manager, Powerton Generating Station



**Midwest Generation, LLC**  
Powerton Generating Station  
13082 E. Manito Road  
Pekin, Illinois 60087

October 8, 2024

Illinois Environmental Protection Agency  
Compliance Assurance Section  
Bureau of Water  
1021 North Grand Avenue East  
Springfield, IL 62702

**Re: Midwest Generation, LLC – Powerton Generating Station**  
**Account No. W1798010008**  
**Pond IDs: W1798010008-01, W1798010008-03, W1798010008-04, W1798010008-05**  
**CCR Surface Impoundment Quarterly Fugitive Dust Complaint Report**

Dear Sir or Madam:

In accordance with the requirements of Title 35 of the Illinois Administrative Code ("35 IAC") Section 845.500(b)(2)(B), this letter serves as the fugitive dust complaint report for Third Quarter 2024 at Powerton Generating Station. There were no complaints received from members of the public during the period July 1, 2024 through September 30, 2024.

If you have any questions or require additional information regarding this submittal, please contact Jill Buckley at [Jill.Buckley@nrg.com](mailto:Jill.Buckley@nrg.com).

Sincerely,

A handwritten signature in blue ink that reads "Chris D. Valente for Todd Mundorf".

Todd Mundorf  
Plant Manager, Powerton Generating Station



January 6, 2025

**Midwest Generation, LLC**  
Powerton Generating Station  
13082 E. Manito Road  
Pekin, Illinois 60087

Illinois Environmental Protection Agency  
DWPC – Permits Section (MC 15)  
Attn: Part 845 Coal Combustion Residual Rule Submittal  
1021 North Grand Avenue East  
Springfield, IL 62702

**Re: Midwest Generation, LLC – Powerton Generating Station  
Account No. W1798010008  
Pond IDs: W1798010008-01, W1798010008-03, W1798010008-04, W1798010008-05  
CCR Surface Impoundment Quarterly Fugitive Dust Complaint Report**

Dear Sir or Madam:

In accordance with the requirements of Title 35 of the Illinois Administrative Code ("35 IAC") Section 845.500(b)(2)(B), this letter serves as the fugitive dust complaint report for Fourth Quarter 2024 at Powerton Generating Station. There were no complaints received from members of the public during the period October 1, 2024 through December 31, 2024.

If you have any questions or require additional information regarding this submittal, please contact Jill Buckley at [Jill.Buckley@nrg.com](mailto:Jill.Buckley@nrg.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Mundorf".

Todd Mundorf  
Plant Manager, Powerton Generating Station

**ATTACHMENT B**  
**2024 ANNUAL INSPECTION REPORT**

**ANNUAL INSPECTION REPORT**  
**ASH SURGE BASIN AND ASH BYPASS BASIN**  
**POWERTON STATION**  
**OCTOBER 2024**

This annual inspection report has been prepared pursuant to both Title 35 of the Illinois Administrative Code (35 IAC) Part 845, Subpart E, Section 845.540(b) and Title 40 of the Code of Federal Regulations (40 CFR) Section 257.83(b) for the Ash Surge Basin (ASB) and Ash Bypass Basin (ABB) at Powerton Station (Station) in Pekin, Illinois. The purpose of this project is to perform the annual inspection of the ASB and ABB by a licensed professional engineer to ensure that the design, construction, operation, and maintenance of the coal combustion residuals (CCR) unit is consistent with recognized and generally accepted good engineering standards. Civil & Environmental Consultants, Inc. (CEC) completed the following scope of services in preparing this annual inspection report:

- CEC reviewed the weekly and monthly inspection reports completed by qualified station personnel and the previous annual inspection report.
- CEC performed the annual inspection in accordance with the requirements of 35 IAC Section 845.540 and 40 CFR Section 257.83(b) including observations pertaining to the following:
  - Changes in Geometry: Observations of changes in the geometry of the ASB and ABB since the previous annual inspection.
  - Instrumentation: Inspection of the location and type of existing instrumentation and documentation of the maximum recorded readings of each instrument since the previous annual inspection from records provided by the Station.
  - Capacity and Impounded Volume: Inspection observations for the approximate minimum, maximum, and present depth and elevation of the impounded water and CCR; storage capacity of the impounding structure at the time of the inspection; and the approximate volume of the impounded water and CCR at the time of the inspection.
  - Structural/Operational Observations: Inspection for actual or potential structural weakness of the CCR surface impoundment, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR surface impoundment and appurtenant structures.

- Other Changes: Inspection including change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.

The ASB is an active CCR surface impoundment. The ABB, at the time of this report, was shut down for a permitted retrofit of the ash pond. The basins are approximately 7.5 acres and 1 acre in size, respectively. On October 10, 2024, CEC inspected both the ASB and ABB and our observations showed no signs of distress that would suggest the stability or operation of the impounding structure is compromised.

## **1.0 CHANGES IN GEOMETRY**

At the time of inspection, the ASB geometry was observed to be unchanged since the October 2023 inspection. The ABB was undergoing a permitted retrofit in which the final geometry was the same with minor modifications to the surface grades on the basin floor and side slopes.

## **2.0 INSTRUMENTATION**

Instrumentation associated with ASB and ABB include water level gauges in each basin and a water level monitoring device in the outlet structure for the ASB. At the time of inspection, the water level gauge in the ABB had been temporarily removed for the retrofit project.

Our interview of Station personnel and review of weekly and monthly inspection reports indicates that the water level monitor is operating properly. The monthly inspections report the pumps, polymer system, and free board measuring device in the ASB are in good condition. Instrumentation associated with the other hydraulic structures, impoundment embankments, and/or slope performance were not observed.

## **3.0 CAPACITY AND IMPOUNDED VOLUME**

Capacity and impounded volume of the ASB and ABB and estimated depth of impounded water and CCR are represented in Table 1 and 2, attached. Volumes and depths were determined through direction by station personnel and by reviewing inspection reports and construction drawings.

## **4.0 STRUCTURAL/OPERATIONAL OBSERVATIONS**

Both the ASB and ABB were inspected for signs of distress that would have the potential to disrupt operation and safety of each basin. Prior to performing the inspection, the previous annual inspection reports were reviewed, which did not identify conditions that indicate an actual or potential structural weakness. Weekly and monthly inspection reports were also reviewed and did not indicate an actual or potential structural weakness.

## **5.0 OTHER CHANGES**

Both the ASB and ABB were inspected for signs of other changes or distress that would have the potential to disrupt operation and safety of each basin. Our inspection showed no distresses that would affect the operation and/or stability of the ASB and ABB.

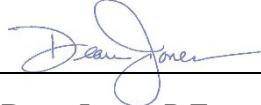
## **6.0 LIMITATIONS AND CERTIFICATION**

This CCR annual inspection report was prepared to meet the requirements of 35 IAC Section 845.540(b) and 40 CFR Section 257.83(b) and was prepared under the direction of Mr. M. Dean Jones, P.E.

By affixing my seal to this, I do hereby certify to the best of my knowledge, information, and belief that the information contained in this report is true and correct. I further certify I am licensed to practice in the State of Illinois and that it is within my professional expertise to verify the correctness of the information. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Seal:



Signature: 

Name: M. Dean Jones, P.E.

Date of Certification: October 14, 2024

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2025

**Table 1: 2024 Inspection Summary - Ash Surge Basin**

<b>Category</b>	<b>Regulation Reference</b>	<b>Evaluation</b>	<b>Recommended Action</b>
<b>Change in Geometry</b>	§845.450(b)(2)(A) §257.83(b)(2)(i)	None	None
<b>Instrumentation</b>	§845.450(b)(2)(B) §257.83(b)(2)(ii)	None	None
<b>Water Depth</b>	§845.450(b)(2)(C) §257.83(b)(2)(iii)	2.5 feet, minimum 2.5 feet, at inspection 10.6 feet, maximum	None
<b>CCR Depth</b>	§845.450(b)(2)(C) §257.83(b)(2)(iii)	2.4 feet	None
<b>Estimated Storage Capacity</b>	§845.450(b)(2)(D) §257.83(b)(2)(iv)	85 Acre Feet	None
<b>Impounded Water Volume</b>	§845.450(b)(2)(E) §257.83(b)(2)(v)	11 Acre Feet	None
<b>Impounded CCR Volume</b>	§845.450(b)(2)(E) §257.83(b)(2)(v)	14 Acre Feet	None
<b>Structural/Operational Observations</b>	§845.450(b)(2)(F) §257.83(b)(2)(vi)	None	None
<b>Other Changes</b>	§845.450(b)(2)(G) §257.83(b)(2)(vii)	None	None

**Table 2: 2024 Inspection Summary - Ash Bypass Basin**

<b>Category</b>	<b>Regulation Reference</b>	<b>Evaluation</b>	<b>Recommended Action</b>
<b>Change in Geometry</b>	§845.450(b)(2)(A) §257.83(b)(2)(i)	None	None
<b>Instrumentation</b>	§845.450(b)(2)(B) §257.83(b)(2)(ii)	None	None
<b>Water Depth</b>	§845.450(b)(2)(C) §257.83(b)(2)(iii)	0.0 feet, minimum 0.0 feet, at inspection 2.4 feet, maximum	None
<b>CCR Depth</b>	§845.450(b)(2)(C) §257.83(b)(2)(iii)	None	None
<b>Estimated Storage Capacity</b>	§845.450(b)(2)(D) §257.83(b)(2)(iv)	2.4 Acre Feet	None
<b>Impounded Water Volume</b>	§845.450(b)(2)(E) §257.83(b)(2)(v)	None	None
<b>Impounded CCR Volume</b>	§845.450(b)(2)(E) §257.83(b)(2)(v)	None	None
<b>Structural/Operational Observations</b>	§845.450(b)(2)(F) §257.83(b)(2)(vi)	None	None
<b>Other Changes</b>	§845.450(b)(2)(G) §257.83(b)(2)(vii)	None	None

**ANNUAL INSPECTION REPORT  
POWERTON STATION - FORMER ASH BASIN  
JULY 2024**

This annual inspection report has been prepared pursuant to both Section 845.540(b) of the Illinois Pollution Control Board's Standards for the Disposal of Coal Combustion Residuals in CCR Surface Impoundments (Illinois CCR Rule) and Part 257.83(b) of the United States Environmental Protection Agency's Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments (Federal CCR Rule) for Midwest Generation, LLC (MWG) at Powerton Station (Station) in Pekin, Illinois. The purpose of this project is to perform the annual inspection of the Former Ash Basin (FAB) by a licensed professional engineer to ensure that the design, construction, operation, and maintenance of the coal combustion residuals (CCR) surface impoundment is consistent with recognized and generally accepted good engineering standards. The inspection includes:

- (1) Review of available information regarding the status and condition of the CCR surface impoundment, including files available in the operating record (e.g., CCR surface impoundment design and construction information, previous structural stability assessments, the results of inspections by a qualified person, and results of previous annual inspections);
- (2) Visual inspection of the CCR surface impoundment to identify signs of distress or malfunction of the CCR surface impoundment and appurtenant structures;
- (3) Visual inspection of any hydraulic structures underlying the base of the CCR surface impoundment or passing through the dike of the CCR surface impoundment for structural integrity and continued safe and reliable operation; and
- (4) Review of annual hazard potential classification certification, annual structural stability assessment certification, annual safety factor assessment certification, and inflow design flood control system plan certification.

Civil & Environmental Consultants, Inc. (CEC) completed the following scope of services in preparing this annual inspection report:

- Reviewed weekly and monthly inspection reports by a qualified person employed by MWG, and the previous annual inspection report.
- Performed the annual inspection in accordance with the requirements of Section 845.540(b) and Part 257.83(b) including observations pertaining to the following:
  - Observations of changes in the FAB geometry since the previous annual inspection were documented;

- Location and type of existing instrumentation was inspected and the maximum recorded readings of each instrument since the previous annual inspection were documented from the records provided by MWG;
- Approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection;
- Storage capacity of the impounding structure at the time of the inspection;
- Approximate volume of the impounded water and CCR at the time of the inspection;
- Any appearances of an actual or potential structural weakness of the CCR surface impoundment, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR surface impoundment and appurtenant structures; and
- Any other changes that may have affected the stability or operation of the impounding structure since the previous annual inspection.

The FAB is an inactive surface impoundment that is scheduled for closure. Approximately 30 acres in size, the FAB does not receive bottom ash or ash slag. The FAB is sectioned into a North Pond and South Pond and the geometry has remained unchanged since the previous inspection. On July 10, 2024, CEC inspected the North and South FAB. Our observations showed no signs of distress that would suggest the stability or operation of the impounding structure is compromised.

## **1.0 CHANGES IN GEOMETRY**

At the time of inspection, the FAB geometry was observed to be unchanged since the July 2023 inspection.

## **2.0 INSTRUMENTATION**

Instrumentation associated with the hydraulic structures, impoundment embankments, and/or slope performance do not exist.

## **3.0 CAPACITY AND IMPOUNDED VOLUME**

Capacity and impounded volume of the FAB and estimated depth of impounded water and CCR are represented in Table 1, attached. The volume of CCR remains unchanged from the previous investigations. FAB water volume fluctuates with the groundwater table and the surface water elevation of the nearby Illinois River. Volumes and depths were determined by reviewing inspection reports and construction drawings.

## **4.0 STRUCTURAL/OPERATIONAL OBSERVATIONS**

CEC inspected the FAB for signs of distress that would have the potential to disrupt operation and safety. Both the North and South Ponds are partially incised minimizing the potential of a release of CCR. CCR is primarily located within the incised area of both ponds. Our observations showed minor signs of distress however, none of which currently suggest the safety, stability, or operation of the impounding structure is compromised.

Items noted during the inspection included minor erosion, animal borrows, and vegetation, again, none of which suggest the safety, stability, or operation of the impounding structure is compromised. Review of weekly inspection records show the Station has maintained the berm and access road by removing fallen trees, filling potholes and erosion areas. Based on the extent of these findings, there are no corrective actions or remedy required.

## **5.0 OTHER CHANGES**

CEC inspected the basin for signs of other changes or distress that would have the potential to disrupt operation and safety of the basin. Our inspection showed no distresses that would affect the operation and/or stability of the FAB.

## **6.0 LIMITATIONS AND CERTIFICATION**

This annual inspection report was prepared to meet the requirements of both Section 845.540(b) and Part 257.83(b) and was prepared under the direction of Mr. M. Dean Jones, P.E.

By affixing my seal to this, I do hereby certify to the best of my knowledge, information, and belief that the information contained in this report is true and correct. I further certify I am licensed to practice in the State of Illinois and that it is within my professional expertise to verify the correctness of the information. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Seal:



Signature: M. Dean Jones

Name: M. Dean Jones, P.E.

Date of Certification: July 11, 2024

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2025

**Table 1: Inspection Summary - Former Ash Basin**

<b>Category</b>	<b>Regulation Reference</b>	<b>Evaluation</b>	<b>Recommended Action</b>
<b>Change in Geometry</b>	845.450(b)(2)(A) 257.83(b)(2)(i)	None	None
<b>Instrumentation</b>	845.450(b)(2)(B) 257.83(b)(2)(ii)	None	None
<b>Water Depth</b>	845.450(b)(2)(C) 257.83(b)(2)(iii)	Below Gauge, minimum 0.0 feet, at inspection 7.6 feet, maximum	None
<b>CCR Depth</b>	845.450(b)(2)(C) 257.83(b)(2)(iii)	10 feet	None
<b>Estimated Storage Capacity</b>	845.450(b)(2)(D) 257.83(b)(2)(iv)	500,000 cubic yards	None
<b>Impounded Water Volume</b>	845.450(b)(2)(E) 257.83(b)(2)(v)	10 acre-feet	None
<b>Impounded CCR Volume</b>	845.450(b)(2)(E) 257.83(b)(2)(v)	310 acre-feet	None
<b>Structural/Operational Observations</b>	845.450(b)(2)(F) 257.83(b)(2)(vi)	Minor erosion and vegetative cover	Continue to monitor
<b>Other Changes</b>	845.450(b)(2)(G) 257.83(b)(2)(vii)	None	None

**ANNUAL COAL COMBUSTION RESIDUALS SURFACE IMPOUNDMENT  
INSPECTION REPORT  
POWERTON STATION - METAL CLEANING BASIN  
JUNE 2024**

This annual coal combustion residuals (CCR) surface impoundment inspection report has been prepared pursuant to Section 845.540(b) of Title 35 Subtitle G, Chapter I, Subchapter j - Coal Combustion Waste Surface Impoundments for Midwest Generation, LLC (MWG) at Powerton Station (Station) in Pekin, Illinois. The purpose of this project is to perform the annual inspection of the Metal Cleaning Basin (MCB) by a licensed professional engineer to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards. The inspection includes:

- A) Review of available information regarding the status and condition of the CCR surface impoundment, including files available in the operating record (e.g., CCR surface impoundment design and construction information required by Sections 845.220(a)(1) and 845.230(d)(2)(A), previous structural stability assessments required under Section 845.450, the results of inspections by a qualified person, and results of previous annual inspections);
- B) Visual inspection of the CCR surface impoundment to identify signs of distress or malfunction of the CCR surface impoundment and appurtenant structures;
- C) Visual inspection of any hydraulic structures underlying the base of the CCR surface impoundment or passing through the dike of the CCR surface impoundment for structural integrity and continued safe and reliable operation;
- D) The annual hazard potential classification certification, (Section 845.440);
- E) The annual structural stability assessment certification, (Section 845.450);
- F) The annual safety factor assessment certification, (Section 845.460); and
- G) The inflow design flood control system plan certification (Section 845.510(c)).

## **1.0 SITE DESCRIPTION**

The MCB (IEPA ID Number W1798010008-03) is located at Powerton Station in Pekin, Illinois situated northeast of the main power building, south of the Wastewater Building and between the Ash Surge Basin and former Cooling Water Intake Canal (see Figure 1). Measuring 450 feet long and 225 feet wide, approximately 2.3 acres in size, the MCB is lined with a 60 mil high-density polyethylene (HDPE) liner. Gravel access roads are located along the north, east, and west sides.

The MCB was constructed in the late 1970s or early 1980s, and has not undergone significant changes in the geometry. The original operation was designed to receive bottom ash and, twice a year, boiler wash via sluicing with wastewater treated in the wastewater treatment plant. Operation of the MCB has changed to also receive bottom ash and fly ash from street sweeping and silo

maintenance by end dumping. Wastewater is periodically pumped from the MCB, treated to remove elevated metal concentrations, and total suspended solids and discharged into the Ash Surge Basin. The MCB is inspected weekly by a qualified person including checking the water level in the basin.

## 2.0 ANNUAL INSPECTION

Civil & Environmental Consultants, Inc. (CEC) inspected the MCB on May 15, 2024. The following tasks were completed in preparing this annual inspection report:

- Reviewed the weekly and monthly inspection reports completed by a qualified person, annual hazard potential classification certification, annual structural stability assessment certification, annual safety factor assessment certification, the inflow design flood control system plan certification, and previous inspection reports prepared by a qualified professional engineer.
- Performed the annual inspection in accordance with the requirements of Section 845.540(b) including observations pertaining to the following:
  - Changes in Geometry - 845.540(b)(2)(A): changes in geometry of the impounding structure since the previous annual inspection;
  - Instrumentation - 845.540(b)(2)(B): location and type of existing instrumentation and the maximum recorded readings of each instrument since the previous annual inspection;
  - Capacity and Impounded Volume - 845.540(b)(2)(C): approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection;
  - Storage Capacity - 845.540(b)(2)(D): storage capacity of the impounding structure at the time of the inspection;
  - Volume of the Impounded Water and CCR - 845.540(b)(2)(E): estimate the approximate volume of the impounded water and CCR at the time of the inspection.
  - Structural/Operational Observations - 845.540(b)(2)(F): appearances of an actual or potential structural weakness of the CCR surface impoundment, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR surface impoundment and appurtenant structures; and
  - Other Changes 845.540(b)(2)(G): any other changes that may have affected the stability or operation of the impounding structure since the previous annual inspection.

Results of our 2024 surface impoundment inspection report are provided in the following section.

## **2.1     Changes in Geometry - 845.540(b)(2)(A)**

At the time of inspection, the MCB geometry was observed to be unchanged from previous inspection reports and assessments.

## **2.2     Instrumentation - 845.540(b)(2)(B)**

Instrumentation associated with the hydraulic structures, impoundment embankments, and/or slope performance were not observed.

## **2.3     Capacity and Impounded Volume - 845.540(b)(2)(C-E)**

The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection are represented in Table 1, attached. Wastewater is periodically pumped from the MCB, treated, and discharged into the Ash Surge Basin. The MCB is inspected weekly by the qualified person including checking the water level in the basin.

## **2.4     Structural/Operational Observations - 845.540(B)(2)(F)**

CEC inspected the basin for signs of distress that would have the potential to disrupt operation and safety of the MCB. The MCB is partially incised minimizing the potential of a release of CCR. Our observations showed no signs of distress which currently suggest the safety, stability, or operation of the impounding structure is compromised.

## **2.5     Other Changes - 845.540(B)(2)(G)**

CEC inspected the MCB for signs of other changes that may have affected the stability or operation of the impounding structure since the previous annual inspection. Our inspection showed no distresses that would affect the operation and/or stability.

## **3.0     CONCLUSIONS**

Our assessments and inspection of the MCB showed no signs of distress that would suggest the stability or operation of the impounding structure is compromised.

## **4.0     LIMITATIONS AND CERTIFICATION**

This CCR surface impoundment inspection was prepared to meet the requirements of Section 845.540(b) and was prepared under the direction of Mr. M. Dean Jones, P.E.

By affixing my seal to this, I do hereby certify to the best of my knowledge, information, and belief that the information contained in this report is true and correct. I further certify I am licensed to practice in the State of Illinois and that it is within my professional expertise to verify the correctness of the information. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Seal:



Signature: 

Name: M. Dean Jones, P.E.

Date of Certification: June 21, 2024

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2025

Enclosure: Table 1 - Inspection Summary - Metal Cleaning Basin

**Table 1: Inspection Summary - Metal Cleaning Basin**

<b>Category</b>	<b>Regulation Reference</b>	<b>Evaluation</b>	<b>Recommended Action</b>
<b>Change in Geometry</b>	845.540(b)(2)	None	None
<b>Instrumentation</b>	845.540(b)(2)	Water Level Guage - OK	None
<b>Water Depth</b>	845.540(b)(2)	0.0 feet, minimum 5.9 feet, at inspection 5.9 feet, maximum	None
<b>CCR Depth</b>	845.540(b)(2)	Less than 1 foot	None
<b>Estimated Storage Capacity</b>	845.540(b)(2)	17 Acre Feet	None
<b>Impounded Water Volume</b>	845.540(b)(2)	8.8 Acre Feet	None
<b>Impounded CCR Volume</b>	845.540(b)(2)	1.0 Acre Feet	None
<b>Structural/Operational Observations</b>	845.540(b)(2)	None	None
<b>Other Changes</b>	845.540(b)(2)	None	None

**ATTACHMENT B.1**  
**2024 ANNUAL HAZARD POTENTIAL**  
**CLASSIFICATION CERTIFICATION**

stable under design operating conditions. Moreover, no visual signs of distress that could be indicative of dike instability were observed during S&L's August 22, 2024, and September 25, 2024, condition assessment performed in support of the basins' 2024 annual structural stability assessment under 35 Ill. Adm. Code 845.450 (Ref. 5). Finally, as noted in both assessments, MWG is closing the Former Ash Basin given the lack of necessary information available to perform these assessments due to the construction age of the basin.

## 7.0 CERTIFICATION

I certify that:

- This hazard potential classification assessment was prepared by me or under my direct supervision.
- The work was conducted in accordance with the requirements of 35 Ill. Adm. Code 845.440.
- I am a registered professional engineer under the laws of the State of Illinois.

Certified By: Thomas Dehlin Date: October 13, 2024

Seal:



 Digitally signed  
by Thomas Dehlin  
Date: 2024.10.13  
11:29:20-05'00'

### **3.0 HAZARD POTENTIAL CLASSIFICATION ASSESSMENT**

Based on our assessment of the MCB and surrounding site features, the MCB remains classified as a Class 2 CCR surface impoundment. Potential downstream inundation areas that could be impacted by a failure or mis-operation the MCB have no buildings and are only occasionally accessed for mowing and inspection purposes that result in no probable loss of human life. Potential economic loss, environmental damage, disruption of lifeline facilities, and impact other concerns are allowed under this classification.

### **4.0 LIMITATIONS AND CERTIFICATION**

This Annual Hazard Potential Classification Assessment Report has been prepared pursuant to the CCR rule codified in Title 35 of the Illinois Administrative Code Section 845.440(a) and was prepared under the direction of Mr. M. Dean Jones, P.E.

By affixing my seal to this, I do hereby certify to the best of my knowledge, information, and belief that the information contained in this report is true and correct. I further certify I am licensed to practice in the State of Illinois and that it is within my professional expertise to verify the correctness of the information. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Seal:



Signature: M. Dean Jones

Name: M. Dean Jones, P.E.

Date of Certification: June 21, 2024

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2025

**ATTACHMENT B.2**  
**2024 ANNUAL STRUCTURAL STABILITY**  
**ASSESSMENT CERTIFICATION**

### 3.2.1 Slope Stability Methodology

The assessment included review of the initial safety factor assessment. The purpose of reviewing the initial 2021 assessment was to confirm the methodology, assumptions and inputs used to complete the safety factor assessment remain relevant. The methodology used for the slope stability analysis reported in the initial safety factor assessment is consistent with Section 845.460 and, considering results of the 2024 CCR surface impoundment inspection showed no modification to either the configuration or condition of the MCB, nor were structural deficiencies observed, the assumptions and inputs used to complete each of the slope stability cases analyzed remain relevant.

### 3.2.2 Conclusion - 2024 Safety Factor Assessment

The initial safety factor assessment and annual inspections were reviewed and confirm the factors of safety for the 2024 safety factor assessment are valid. We have concluded that the initial safety factor assessment from June 2021 is valid and that the calculated factors of safety for the MCB achieve the minimum safety factors specified for the critical cross section of the embankment

## 4.0 LIMITATIONS AND CERTIFICATION

The annual structural stability and factor of safety assessment was prepared to meet the requirements of Parts 845.450 and 845.460 of Title 35 Subtitle G, Chapter I, Subchapter j - Coal Combustion Waste Surface Impoundments, and was prepared under the direction of Mr. M. Dean Jones, P.E.

By affixing my seal to this, I do hereby certify to the best of my knowledge, information, and belief that the information contained in this report is true and correct. I further certify I am licensed to practice in the State of Illinois and that it is within my professional expertise to verify the correctness of the information. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Seal:



Signature: M. Dean Jones

Name: M. Dean Jones, P.E.

Date of Certification: June 21, 2024

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2025

## 5.0 CERTIFICATION

I certify that:

- This structural stability assessment was prepared by me or under my direct supervision.
- The work was conducted in accordance with the requirements of 35 Ill. Adm. Code 845.450.
- I am a registered professional engineer under the laws of the State of Illinois.

Certified By: Thomas J. Dehlin

Date: October 13, 2024

Seal:



**ATTACHMENT B.3**  
**2024 ANNUAL SAFETY FACTOR**  
**ASSESSMENT CERTIFICATION**

## 6.2 FORMER ASH BASIN

The initial federal safety factor assessment completed for the Former Ash Basin in 2018 (Ref. 4) concluded that an engineering analysis to calculate the safety factors for the basin could not be performed given the lack of necessary information due to the construction age of the Former Ash Basin. Since the minimum safety factors of the Former Ash Basin could not be demonstrated, MWG is closing the Former Ash Basin in accordance with Subpart G of the Illinois CCR Rule and 40 CFR 257.102. MWG plans to close the Former Ash Basin upon receipt of a closure construction permit from the Illinois EPA in accordance with Subpart B of the Illinois CCR Rule. A construction permit application for the closure work was submitted to the Illinois EPA on October 26, 2022.

## 7.0 CERTIFICATION

I certify that:

- This safety factor assessment was prepared by me or under my direct supervision.
- The work was conducted in accordance with the requirements of 35 Ill. Adm. Code 845.460.
- I am a registered professional engineer under the laws of the State of Illinois.

Certified By: Thomas J. Dehlin Date: October 13, 2024

Seal:



 Digitally signed by  
Thomas Dehlin  
Date: 2024.10.13  
11:29:36-05'00'

### 3.2.1 Slope Stability Methodology

The assessment included review of the initial safety factor assessment. The purpose of reviewing the initial 2021 assessment was to confirm the methodology, assumptions and inputs used to complete the safety factor assessment remain relevant. The methodology used for the slope stability analysis reported in the initial safety factor assessment is consistent with Section 845.460 and, considering results of the 2024 CCR surface impoundment inspection showed no modification to either the configuration or condition of the MCB, nor were structural deficiencies observed, the assumptions and inputs used to complete each of the slope stability cases analyzed remain relevant.

### 3.2.2 Conclusion - 2024 Safety Factor Assessment

The initial safety factor assessment and annual inspections were reviewed and confirm the factors of safety for the 2024 safety factor assessment are valid. We have concluded that the initial safety factor assessment from June 2021 is valid and that the calculated factors of safety for the MCB achieve the minimum safety factors specified for the critical cross section of the embankment

## 4.0 LIMITATIONS AND CERTIFICATION

The annual structural stability and factor of safety assessment was prepared to meet the requirements of Parts 845.450 and 845.460 of Title 35 Subtitle G, Chapter I, Subchapter j - Coal Combustion Waste Surface Impoundments, and was prepared under the direction of Mr. M. Dean Jones, P.E.

By affixing my seal to this, I do hereby certify to the best of my knowledge, information, and belief that the information contained in this report is true and correct. I further certify I am licensed to practice in the State of Illinois and that it is within my professional expertise to verify the correctness of the information. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Seal:



Signature: M. Dean Jones

Name: M. Dean Jones, P.E.

Date of Certification: June 21, 2024

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2025

**ATTACHMENT B.4**

**2024 ANNUAL INFLOW DESIGN FLOOD**

**CONTROL SYSTEM PLAN**

**CERTIFICATION**

## 6.0 CONCLUSIONS

Based on the results in Table 5-1, the Ash Surge Basin, Bypass Basin, and Former Ash Basin have adequate hydraulic capacities to retain the 1,000-year flood event without water overtopping the basins' dikes. In addition, the Ash Surge Basin has adequate hydraulic capacity to retain the 1,000-year flood event without water overflowing into its emergency spillway structure. Therefore, the Ash Surge Basin, Bypass Basin, and Former Ash Basin are able to collect and control the inflow design flood event specified in 35 Ill. Adm. Code 845.510(a)(3).

## 7.0 CERTIFICATION

I certify that:

- This inflow design flood control system plan was prepared by me or under my direct supervision.
- The work was conducted in accordance with the requirements of 35 Ill. Adm. Code 845.510.
- I am a registered professional engineer under the laws of the State of Illinois.

Certified By: Thomas J. Dehlin Date: October 13, 2024

Seal:



 Digitally signed  
by Thomas Dehlin  
Date: 2024.10.13  
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**Table 5-1 – Summary of Hydrologic & Hydraulic Assessment Results for the Metal Cleaning Basin**

CCR Surface Impoundment	Illinois Hazard Potential Classification	Inflow Design Flood	Maximum Surface Water Elevation	Basin Crest Elevation
Metal Cleaning Basin	Class 2	1,000 Year	463.15 feet	467.00 feet

## 6.0 CONCLUSIONS

Based on the results in Table 5-1, the Metal Cleaning Basin has adequate hydraulic capacity to retain the 1,000-year flood event without water overtopping the basin's dikes. Therefore, the Metal Cleaning Basin is able to collect and control the inflow design flood event specified in 35 Ill. Adm. Code 845.510(a)(3).

## 7.0 CERTIFICATION

I certify that:

- This inflow design flood control system plan was prepared by me or under my direct supervision.
- The work was conducted in accordance with the requirements of 35 Ill. Adm. Code 845.510.
- I am a registered professional engineer under the laws of the State of Illinois.

Certified By: \_\_\_\_\_ Thomas J. Dehlin \_\_\_\_\_ Date: \_\_\_\_\_ October 13, 2024 \_\_\_\_\_

Seal:



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Thomas Dehlin  
Date: 2024.10.13  
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**ATTACHMENT C**

**2024 ANNUAL GROUNDWATER**

**MONITORING AND CORRECTIVE ACTION**

**REPORT**



ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

**ILLINOIS CCR COMPLIANCE  
POWERTON ASH BASINS  
ANNUAL GROUNDWATER MONITORING and  
CORRECTIVE ACTION REPORT – 2024**

**Midwest Generation, LLC  
Powerton Station  
13082 E. Manito Road  
Pekin, Illinois 61554**

Prepared By:                   KPRG and Associates, Inc.  
  14665 West Lisbon Road, Suite 1A  
  Brookfield, WI 53005

January 31, 2025

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## 1.0 INTRODUCTION and OVERVIEW

Groundwater monitoring requirements in accordance with the Ill. Adm. Code Title 35, Part 845: Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments dated April 15, 2021 (State CCR Rule), along with subsequent amendments and the issued facility CCR Operating Permit 2024-CO-100029, have been completed for the ash pond monitoring wells located at the Midwest Generation, LLC (Midwest Generation) Powerton Generating Station. The noted Operating Permit was issued on July 3, 2024 and covers the operating and groundwater monitoring requirements for all four CCR Surface Impoundments. Specifically, these are:

- Ash Surge Basin (ASB) – Pond ID W1798010008-01
- Metal Cleaning Basin (MCB) – Pond ID W1798010008-03
- Ash By-pass Basin (ABB) – Pond ID W1798010008-04
- Former Ash Basin (FAB) – Pond ID W1798010008-05

In accordance with Special Condition #12, a new background well, MW-16, has been identified for the subsequent development of new statistical background values to be calculated in accordance with the procedures defined in Revised Attachment 9-5, Illinois State CCR Rule Compliance – Revised Statistical Approach for Groundwater Data Evaluation dated September 23, 2024. This revision was submitted to Illinois Environmental Protection Agency (IEPA) in fulfillment of requirements under Special Condition #16 of the Operating Permit. A minimum of eight rounds of background sampling will be completed at this well location in accordance with Special Condition #17(c) and the statistical calculations will be submitted to IEPA within 640 days of the effective date of the permit in accordance with Special Condition #18 of the Operating Permit. To date, three rounds of sampling have been completed at this new background well location.

In accordance with Special Condition #13, the following downgradient groundwater monitoring wells are being sampled:

- Silty Clay/Silt Unit – MW-06, MW-14, MW-22 and MW-18A.
- Sand and Gravel Unit – MW-01, MW-02, MW-03, MW-04, MW-05, MW-07, MW-10 and MW-21D.

It is noted that upgradient well MW-16 has been identified by IEPA in the Operating Permit to represent background water quality for both the Silty Clay/Silt Unit and the Sand and Gravel Unit. The locations of these wells are included on Figure 1.

All CCR groundwater monitoring data available to date for these wells, which in some cases includes data from previous groundwater monitoring under the Federal CCR Rule, are provided in Tables 1 and 2 for the Silty Clay/Silt Unit and the Sand and Gravel Unit, respectively. The tables include the Groundwater Protection Standards (GWPSs) established for these parameters under Special Conditions #21 and #22 of the Operating Permit. It is noted that these GWPSs may be changed based on the results of new background well sampling (MW-16) as discussed above, and

as allowed for in Special Conditions #21 and #22. Tables 3 and 4 summarize the turbidity data from these wells for the Silty Clay/Silt Unit and the Sand and Gravel Unit, respectively.

This overview of the 2024 groundwater monitoring period relative to the wells identified in the Operating Permit as previously specified above, is provided in accordance with Section 845.610(e)(4). Each required item is discussed separately below.

- Section 845.610(e)(4)(A and B) – As discussed above, the Operating Permit has identified a new background monitoring well, MW-16, to be sampled for the purposes of establishing statistical background in accordance with the Revised Attachment 9-5, Illinois State CCR Rule Compliance – Revised Statistical Approach for Groundwater Data Evaluation dated September 23, 2024. Because this well was not sampled in the past for CCR monitoring purposes, there is insufficient data available to establish the statistical background. Therefore, identifying whether there has been a statistically significant increase (SSI) in any parameter in downgradient monitoring wells over the established background cannot be completed at this time. Once a minimum of eight rounds of data from this well are collected, the appropriate statistical evaluations will be completed and submitted to IEPA in accordance with Special Condition #18.
- Section 845.610(e)(4)(C and D) – Initial GWPSSs have been established by the Operating Permit under Special Conditions #21 and #22, for the Silty Clay/Silt Unit and the Sand and Gravel Unit, respectively. The following constituents and associated wells with verified detections above the GWPSSs during 2024 are:

#### Silty Clay/Silt Unit

- MW-14: sulfate, total dissolved solids (TDS), molybdenum and thallium (3<sup>rd</sup> and 4<sup>th</sup> quarters)
- MW-18A: TDS (3<sup>rd</sup> and 4<sup>th</sup> quarters)

#### Sand and Gravel Unit

- MW-07: arsenic and cobalt (3<sup>rd</sup> and 4<sup>th</sup> quarters)
- Section 845.610(e)(4)(E) – Based on the verified detections above permit established GWPSSs, an assessment of corrective measures will be initiated in accordance with Section 845.660(a)(1). The nature and extent of impacts will also be evaluated in accordance with Section 845.650(d)(1).
- Section 845.610(e)(4)(F through H) – The assessment of corrective measures has not yet been completed; therefore, items under these requirements are not yet applicable.

## 2.0 ANNUAL STATUS SUMMARY

The groundwater monitoring network was defined in Section 1.0 above and the locations of these wells are included on Figure 1. All CCR groundwater monitoring data available to date, which includes data from previous groundwater monitoring under the Federal CCR Rule, are provided in

Tables 1 through 4. Tables 1 and 2 include GWPSs established under Special Conditions #21 and #22 of the Operating Permit.

This section provides the information specified under Section 845.610(e) (2-3).

## 2.1 Summary of Actions and Submittals (Section 845.610(e)(2))

The following key actions have been completed during the 2024 reporting period:

- Quarterly sampling of all parameters specified in Section 845.600(a) plus calcium and turbidity was completed and the associated 60-day data summary submittals were submitted and placed in the facilities operating record in accordance with Section 845.610(b)(3)(D). As of July 3, 2024, the groundwater monitoring network has been modified as defined in Section 1.0 above in accordance with the Operating Permit.
- Water levels were recorded monthly for the specified monitoring wells in Special Condition #14 of the Operating Permit. In addition, in accordance with requirements under this Special Condition, surface water elevations were recorded for the Illinois River as measured at the staff gauge at the USGS Kingston Mines station and at a staff gauge installed onsite in June 2024 within Lost Creek. Pond water levels were also concurrently recorded.
- In fulfillment of Special Condition #16 of the Operating Permit, a Revised Attachment 9-5, Illinois State CCR Rule Compliance – Revised Statistical Approach for Groundwater Data Evaluation dated September 23, 2024 was submitted to IEPA.
- In partial fulfillment of Special Condition #19 of the Operating Permit, berm material samples from 10 locations surrounding the regulated units were collected at 10-foot intervals for chemical analysis of CCR parameters. The results of that sampling will be submitted along with the required geotechnical analysis of the lateral extent of materials supporting the basins. The submittal date for this requirement specified in the Operating Permit was temporarily stayed by the Illinois Pollution Control Board (IPCB) on December 19, 2024 pending requested clarifications by the IEPA to certain permit conditions.
- In fulfillment of Special Conditions #11, #13 and #14, three new monitoring wells were installed to be included within the groundwater monitoring network. Specifically, these wells were:
  - Silty Clay/Silt Unit – wells MW-22 and MW-18A (well MW-18A replaces well MW-23 identified in the Operating Permit as that well location did not encounter a saturated Silty Clay/Silt Unit. Well MW-18A was installed adjacent to existing well MW-18 with its screen focused within only the Silty Clay/Silt Unit).

- Sand and Gravel Unit – well MW-21D.

In addition to these wells, two piezometers, P-1 and P-2, were installed with screens placed strictly within the fill materials at these locations. A staff gauge was also installed onsite within Lost Creek. Documentation of these installations is provided in Attachment 1 and the associated survey data is provided in Attachment 2.

- The ABB underwent retrofitting construction in accordance with the IEPA issued Construction Permit No. 2024-CC-100030 dated July 3, 2024. The retrofit work has been completed and certified by the design engineer on October 18, 2024. Construction documentation has been provided to IEPA and can be found on the facility's CCR website.

Key activities for the upcoming year include:

- Conduct an assessment of corrective measures in accordance with Section 845.660(a)(1) and a nature and extent of impacts evaluation in accordance with Section 845.650(d)(1).
- Continued quarterly groundwater monitoring/reporting and surface water elevation monitoring in accordance with Special Conditions #12, #13, #14, #21 and #22 of the Operating Permit.

## 2.2 Groundwater Data Summary (Section 845.610(e)(3)(A-F)

Identification of monitoring wells and associated constituent concentrations above the proposed site specific GWPSs was included in Section 1.0 above. A map showing these wells and constituent concentrations above the proposed GWPSs for the most recent sampling (4<sup>th</sup> quarter 2024) is provided on Figure 2.

As previously discussed, in fulfillment of Special Conditions #11, #13 and #14, three new monitoring wells were installed to be included within the groundwater monitoring network. Wells MW-22 and MW-18A were installed within the Silty Clay/Silt Unit and well MW-21D was installed with the Sand and Gravel Unit. Well MW-18A replaces well MW-23 identified in the Operating Permit as that well location did not have a saturated Silty Clay/Silt Unit. Well MW-18A was installed adjacent to existing well MW-18 with its screen focused within only the Silty Clay/Silt Unit). In addition to these wells, two piezometers, P-1 and P-2, were installed with screens placed strictly within the fill materials at these locations. A staff gauge was also installed onsite within Lost Creek. Documentation of these installations is provided in Attachment 1 and the associated survey data is provided in Attachment 2.

Monthly water levels were recorded from the specified CCR monitoring wells. The water levels are summarized in Table 5. This table includes Illinois River water levels from the U.S. Geological Survey (USGS) Kingston Mine gauge, which is the nearest river gauging station to the site, for each well water level measuring event. In addition, water level from piezometers P-1 and P-2 which are screened in fill material are also included on the table.

A review of water levels associated with the 2024 quarterly groundwater sampling events (February, June, September and November), shows that river water levels were slightly higher in elevation than those measured at downgradient monitoring well MW-04 (June and September) and wells MW-03/MW-04 (November) but the water elevations at these well locations are also lower than those from wells further to the south indicating they may be within a mixing zone. These are the two wells closest to the river. Based on this observation, it is noted that the water chemistry data from those wells, for those sampling events, may be skewed either lower or higher depending on the river water quality that may have mixed with groundwater in the vicinity of those wells.

Potentiometric surface maps for each round of water levels collected in 2024 are provided in Attachment 3. It is noted that CCR monitoring wells MW-06, MW-08, MW-12, MW-14, MW-15, MW-17, MW-18A and MW-22 are screened within a shallow, localized, saturated silty clay/silt unit which is underlain by a more extensive sand unit. The remaining monitoring wells have deeper screens, within the more extensive sand and gravel unit with the exception of MW-18 which appears to be in a transitional zone between the two units. The water levels from wells screened in the silty clay/silt unit and the water levels from monitoring wells screened within the sand and gravel unit were evaluated separately and used to generate potentiometric surface maps for each unit. Groundwater flow beneath the ABB, ASB and MCB within the silty clay/silt unit has historically been illustrated with a westerly flow direction as shown in the groundwater flow maps for January through February 2024 (see Attachment 3). However, with the installation of new silty clay/silt unit wells on the east side of the ASB in April 2024 (MW-23) and August 2024 (MW-18A), there is an indication of divergent flow within this unit which is still consistent with stratigraphic interpretations of the localized, discontinuous silty clay/silt unit beneath this portion of the site. Flow continues to the west towards the former intake channel, however, there is also a component of flow to the east reflecting the slope/trace of the silty clay/silt unit to the east, northeast and southeast. The divergent flow, as noted above, is a function of stratigraphy as the water levels are consistently below the base elevation of the ASB liner system which based on construction drawings is 452 feet above mean sea level (amsl).

Groundwater flow within the sand and gravel unit is generally in a northerly direction with some divergent flow to the northeast and/or northwest. Some higher than normal water levels were recorded on the northern portion of the site relative to the central part of the site during the April water level measurements in the sand and gravel unit. This may be reflective of ongoing system re-equilibration from high Illinois River water levels which crested approximately 24 hours prior to the date of measurement.

In accordance with Section 845.640(c)(2), groundwater flow direction and seepage velocity estimates for each round of water levels are provided in Table 6. A summary of the number of groundwater samples collected for analysis, since the issuance date of the Operating Permit, for each CCR monitoring well along with sample dates is provided in Table 7. It is noted that the summary data tables also include two rounds of quarterly

groundwater sampling (February and June) that was completed in 2024 prior to issuance of the Operating Permit.

As previously discussed, the Operating Permit has identified a new background monitoring well, MW-16, to be sampled for the purposes of establishing a new statistical background in accordance with the Revised Attachment 9-5, Illinois State CCR Rule Compliance – Revised Statistical Approach for Groundwater Data Evaluation dated September 23, 2024. Because this well was not sampled in the past for CCR monitoring purposes, there is insufficient data available to establish the statistical background. Therefore, identifying whether there has been a statistically significant increase (SSI) in any parameter in downgradient monitoring wells over the established background cannot be completed at this time. Once a minimum of eight rounds of data from this well are collected, the appropriate statistical evaluations will be completed and submitted to IEPA in accordance with Special Condition #18. Wells with detections above the initial GWPSs established in the Operating Permit during the 2024 groundwater monitoring were identified in Section 1.0 above.

## **TABLES**

Table 1. Groundwater Analytical Results - Midwest Generation, LLC, Powerton Station, Pekin, IL. Silty Clay/Silt Unit.

Well	Date	Boron	Calcium	Chloride	Fluoride	pH	Sulfate	Total Dissolved Solids	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Lead	Lithium	Mercury	Molybdenum	Radium 226 + 228	Selenium	Thallium
GWPS		4.7	NSP	200.0	4.0	6.5-9.0	400.0	1200.0	0.006	0.010	2.0	0.0040	0.005	0.1	0.006	0.008	0.04	0.002	0.10	5.0	0.05	0.002
MW-16 up-gradient	6/18/2024	0.19	110	21	< 0.10	6.91	39	510	< 0.0030	< 0.0010	0.040	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	<sup>^1+</sup> < 0.010	< 0.00020	< 0.0050	< 0.639	< 0.0025	< 0.0020
	9/11/2024	0.18	110	22	< 0.10	7.05	25	500	< 0.0030	< 0.0010	0.039	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	< 0.010	< 0.00020	< 0.0050	< 0.754	< 0.0025	< 0.0020
	11/20/2024	0.16	120	28	< 0.10	7.15	25	610	< 0.0030	< 0.0010	0.048	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	< 0.010	< 0.00020	< 0.0050	0.755	< 0.0025	< 0.0020
	6/18/2024	0.39	94	140	0.49	7.64	220	820	< 0.0030	0.0021	0.059	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	<sup>^1+</sup> < 0.010	< 0.00020	0.010	< 0.722	< 0.0025	< 0.0020
MW-06 down-gradient	9/10/2024	0.40	96	130	0.48	7.64	270	880	< 0.0030	0.0032	0.075	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	< 0.010	< 0.00020	0.011	1.94	< 0.0025	< 0.0020
	11/19/2024	0.27	96	150	0.43	7.65	290	950	< 0.0030	0.0028	0.071	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	< 0.010	< 0.00020	0.011	< 0.19	< 0.0025	< 0.0020
MW-14 down-gradient	4/8/2021	2.1	200	98	1.1	7.33	630	1600	< 0.003	0.0028	0.036	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.028	< 0.0002	0.035	< 0.605	0.029	0.0022
	5/12/2021	2.6	210	100	1.1	7.13	640	1700	< 0.003	0.0047	0.038	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.028	< 0.0002	0.034	< 0.43	0.0039	0.0028
	6/3/2021	2.1	200	26	1.0	6.79	590	1600	< 0.003	0.0025	0.036	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.025	< 0.0002	0.028	< 0.357	0.094	0.0025
	6/28/2021	B 2.0	210	93	0.99	6.90	570	1700	<sup>^1+</sup> < 0.003	0.0014	0.034	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.028	< 0.0002	0.03	0.758	0.034	0.0023
	7/20/2021	2.0	190	81	0.89	6.88	500	1700	< 0.003	0.0025	0.057	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.027	< 0.0002	0.021	< 0.434	< 0.0025	< 0.002
	8/23/2021	2.1	210	91	0.96	6.91	560	1800	< 0.003	0.0022	0.035	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.03	< 0.0002	0.031	0.515	0.01	0.0021
	10/1/2021	1.9	200	100	0.95	7.06	640	1700	< 0.003	0.0045	0.039	< 0.001	0.0005	< 0.005	< 0.001	0.00065	<sup>^1+</sup> 0.034	< 0.0002	0.037	< 0.581	< 0.0025	0.002
	11/29/2021	2.0	180	94	1.10	7.01	<sup>^1-</sup> 480	1400	< 0.003	0.0025	0.032	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.026	< 0.0002	0.033	< 0.442	0.01	< 0.002
	2/9/2022	1.9	180	67	1.10	6.91	430	1500	< 0.003	0.013	0.046	< 0.001	0.00056	< 0.005	< 0.001	< 0.0005	0.026	< 0.0002	0.03	0.724	< 0.0025	0.0022
	6/8/2022	2.2	220	87	0.96	7.12	810	2100	< 0.003	0.0041	0.057	< 0.001	0.00056	< 0.005	< 0.001	< 0.0005	0.022	< 0.0002	0.038	< 0.429	0.013	0.0033
	8/31/2022	2.2	B 200	120	0.86	6.74	610	1800	< 0.003	0.004	0.056	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.027	< 0.0002	0.024	0.743	< 0.0025	< 0.002
	11/17/2022	NS	NS	NS	NS	6.93	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	2/22/2023	2.2	190	120	0.76	7.40	600	1700	< 0.0030	0.015	0.067	<sup>^1+</sup> <sup>^1-</sup> < 0.010	0.00085	< 0.0050	< 0.0010	0.0015	0.021	0.00022	0.025	< 0.552	0.024	0.0020
	5/17/2023	2.3	280	100	1.0	7.02	1100	2600	< 0.0030	0.0016	0.054	<sup>^1+</sup> <sup>^1-</sup> < 0.010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.021	< 0.00020	0.044	< 0.712	0.090	0.0027
	8/29/2023	1.5	180	150	1.0	6.84	880	2300	< 0.0020	< 0.0020	0.041	0 0010	< 0.00020	< 0.0050	< 0.0005	0.00056	0.024	< 0.00020	0.034	0.816	< 0.005	0.0022
	11/6/2023	1.5	190	140	0.87	6.95	840	2200	< 0.0030	0.0026	0.042	< 0.0010	< 0.00050	< 0.0050	< 0.00100	< 0.00050	0.018	< 0.00020	0.032	1.22	0.0086	< 0.0020
	2/20/2024	1.6	200	130	1.0	7.12	670	2000	< 0.0030	0.0012	0.039	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	22	< 0.00020	0.026	< 0.505	0.0039	0.0021
	6/18/2024	2.2	290	85	1.1	6.85	1500	3900	< 0.0030	0.0020	0.058	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	< 0.050	< 0.00020	0.10	< 0.553	0.053	0.0051
	9/9/2024	2.3	230	110	1.4	7.14	<b>1800</b>	<b>4100</b>	<sup>^1+</sup> < 0.0030	0.0029	0.063	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.018	< 0.00020	<b>0.14</b>	0.584	0.010	<b>0.0035</b>
	11/18/2024	2.7	250	110	1.3	7.15	<b>1700</b>	<b>3800</b>	< 0.0030	0.0019	0.056	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.020	< 0.00020	<b>0.11</b>	< 0.639	< 0.0025	<b>0.0026</b>
MW-18A down-gradient	9/12/2024	0.53	220	140	0.23	6.95	270	<b>1400</b>														

Table 2. Groundwater Analytical Results - Midwest Generation, LLC, Powerton Station, Pekin, IL. Sand and Gravel Unit.

Well	Date	Boron	Calcium	Chloride	Fluoride	pH	Sulfate	Total Dissolved Solids	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Lead	Lithium	Mercury	Molybdenum	Radium 226 + 228	Selenium	Thallium
GWPS		4.7	NSP	200	4.0	6.5-9.0	400	1200	0.006	0.010	2.0	0.004	0.005	0.1	0.006	0.0075	0.04	0.002	0.1	5	0.05	0.002
MW-16 upgradient	6/18/2024	0.19	110	21	< 0.10	6.91	39	510	< 0.0030	< 0.0010	0.040	< 0.0010	< 0.0050	< 0.0010	< 0.00050	< 0.00050	< 0.0010	< 0.00020	< 0.0050	< 0.639	< 0.0025	< 0.0020
	9/11/2024	0.18	110	22	< 0.10	7.05	25	500	< 0.0030	< 0.0010	0.039	< 0.0010	< 0.0050	< 0.0010	< 0.00050	< 0.00050	< 0.0010	< 0.00020	< 0.0050	< 0.754	< 0.0025	< 0.0020
	11/20/2024	0.16	120	28	< 0.10	7.15	25	610	< 0.0030	< 0.0010	0.048	< 0.0010	< 0.0050	< 0.0010	< 0.00050	< 0.00050	< 0.0010	< 0.00020	< 0.0050	< 0.755	< 0.0025	< 0.0020
	11/16/2015	1.0	98	44	0.17	7.07	93	530	< 0.003	< 0.001	0.057	^< 0.001	< 0.005	< 0.001	* < 0.0005	< 0.005	< 0.01	< 0.0002	< 0.0050	0.744	< 0.0025	* 0.002
MW-01 down-gradient	2/25/2016	0.2	110	42	0.16	7.23	54	460	< 0.003	0.0025	0.053	< 0.001	< 0.005	< 0.005	0.0014	< 0.001	< 0.002	< 0.005	< 0.722	< 0.0029	< 0.002	
	5/20/2016	0.34	100	44	0.17	6.95	65	430	< 0.003	0.0081	0.062	< 0.001	< 0.005	0.007	0.0053	0.011	< 0.01	< 0.002	< 0.005	< 0.953	< 0.0025	< 0.002
	8/17/2016	0.27	78	39	0.25	7.16	50	530	< 0.003	0.0014	0.048	< 0.001	< 0.005	< 0.005	< 0.001	0.0014	< 0.01	< 0.002	0.0057	< 0.491	< 0.0025	< 0.002
	11/16/2016	0.18	97	39	0.21	7.22	32	500	< 0.003	0.0051	0.056	< 0.001	< 0.005	< 0.005	0.0044	0.0082	< 0.01	< 0.002	0.0059	< 0.618	< 0.0025	< 0.002
	2/14/2017	0.18	120	55	0.17	7.30	60	550	< 0.003	0.0041	0.056	< 0.001	< 0.005	< 0.005	0.0045	0.0076	< 0.01	< 0.002	0.0056	< 0.837	< 0.0025	< 0.002
	5/3/2017	0.19	86	66	0.16	7.41	45	460	< 0.003	0.0015	0.045	< 0.001	< 0.005	< 0.005	0.0033	0.0067	< 0.01	< 0.002	< 0.005	0.574	< 0.0025	< 0.002
	6/21/2017	0.18	85	58	0.18	7.60	47	540	< 0.003	< 0.001	0.040	< 0.001	< 0.005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.002	0.0061	< 0.418	< 0.0025	< 0.002
	8/25/2017	0.56	86	41	0.18	7.41	63	490	< 0.003	< 0.001	0.049	< 0.001	< 0.005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.002	0.0059	0.775	< 0.0025	< 0.002
	11/8/2017	0.57	130	38	0.12	6.69	61	640	< 0.003	< 0.001	0.083	< 0.001	< 0.005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.002	< 0.005	0.343	< 0.0025	< 0.002
	5/17/2018	0.15	88	50	0.12	6.70	48	540	< 0.003	< 0.001	0.045	< 0.001	< 0.005	< 0.005	< 0.001	< 0.00068	< 0.01	< 0.002	< 0.005	< 0.396	< 0.0025	< 0.002
	8/8/2018	0.14	86	48	0.13	6.80	43	430	< 0.003	< 0.001	0.051	^< 0.001	< 0.005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.002	< 0.005	0.579	< 0.0025	< 0.002
	4/30/2019	0.07	78	54	0.17	7.20	27	450	< 0.003	0.0014	0.039	< 0.001	< 0.005	< 0.005	< 0.001	0.0017	< 0.01	< 0.002	< 0.005	0.656	< 0.0025	< 0.002
	8/26/2019	0.57	100	39	0.13	7.15	71	550	< 0.003	< 0.001	0.053	< 0.001	< 0.005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.002	< 0.005	0.802	< 0.0025	< 0.002
	2/24/2020	0.28	87	53	0.21	7.19	34	410	< 0.003	< 0.001	0.044	^< 0.001	< 0.005	< 0.005	< 0.001	0.0057	< 0.01	< 0.002	< 0.005	< 0.478	< 0.0025	< 0.002
	4/8/2020	0.33	110	46	0.19	7.17	41	470	< 0.001	0.051	NA	< 0.005	< 0.005	< 0.001	< 0.0005	< 0.001	< 0.01	< 0.002	< 0.005	0.628	< 0.0025	< 0.002
	12/7/2020	0.59	100	54	0.25	7.22	55	640	< 0.001	0.058	NA	< 0.005	< 0.005	< 0.001	< 0.0005	< 0.001	< 0.01	< 0.002	0.0052	< 0.542	< 0.0025	< 0.002
	5/1/2021	0.21	85	51	0.21	7.52	37	450	< 0.003	< 0.001	0.043	< 0.001	< 0.005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.002	0.521	< 0.0025	< 0.002	
	8/4/2021	0.27	99	40	0.18	7.19	56	430	< 0.003	< 0.001	0.061	< 0.001	< 0.005	< 0.005	< 0.001	< 0.00088	< 0.01	< 0.002	0.007	< 0.463	< 0.0025	< 0.002
	11/30/2021	0.35	84	41	0.19	7.14	^~ 28	410	< 0.003	< 0.001	0.06	< 0.001	< 0.005	< 0.005	< 0.001	< 0.0005	0.005	< 0.002	0.0072	< 0.434	< 0.0026	< 0.002
	2/9/2022	0.18	96	47	0.17	7.33	48	520	< 0.003	0.0017	0.052	< 0.001	< 0.005	< 0.005	< 0.001	0.0012	0.003	< 0.002	0.0074	< 0.527	< 0.0025	< 0.002
	6/7/2022	0.21	81	51	0.14	7.62	27	430	< 0.003	< 0.001	0.04	< 0.001	< 0.005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.002	0.0057	0.531	< 0.0025	< 0.002
	8/30/2022	0.59	92	44	0.15	7.10	66	810	< 0.003	0.073	^< 0.001	< 0.005	< 0.001	< 0.005	< 0.001	< 0.0005	^< 0.01	< 0.0002	< 0.005	< 0.441	< 0.0025	< 0.002
	11/15/2022	0.74	110	47	0.1	7.15	45	530	< 0.003	< 0.001	0.086	< 0.001	< 0.005	< 0.005	< 0.001	< 0.0005	< 0					

Table 2. Groundwater Analytical Results - Midwest Generation, LLC, Powerton Station, Pekin, IL. Sand and Gravel Unit.

Well	Date	Boron	Calcium	Chloride	Fluoride	pH	Sulfate	Total Dissolved Solids	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Lead	Lithium	Mercury	Molybdenum	Radium 226 + 228	Selenium	Thallium
	GWPS	4.7	NSP	200	4.0	6.5-9.0	400	1200	0.006	0.010	2.0	0.004	0.005	0.1	0.006	0.0075	0.04	0.002	0.1	5	0.05	0.002
MW-04 down-gradient	6/20/2017	0.5	77	55	0.29	7.45	53	480	< 0.003	< 0.001	0.0025	< 0.001	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	< 0.005	< 0.343	< 0.025	< 0.002	
	8/28/2017	V 0.73	90	89	0.33	7.13	110	680	< 0.003	< 0.001	0.028	< 0.001	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.013	< 0.246	< 0.025	< 0.002	
	11/7/2017	0.60	110	94	0.24	6.80	130	650	< 0.003	< 0.001	0.051	< 0.001	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	< 0.005	< 0.332	< 0.0092	< 0.002	
	5/15/2018	0.68	87	66	0.27	7.63	100	630	< 0.003	< 0.001	0.037	< 0.001	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	< 0.005	0.661	< 0.025	< 0.002	
	8/7/2018	0.79	84	71	0.32	6.72	49	510	< 0.003	0.0011	0.031	<^> 0.001	< 0.005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.006	< 0.334	< 0.025	< 0.002
	10/30/2018	0.54	100	80	0.24	7.55	91	690	< 0.003	< 0.001	0.049	< 0.001	< 0.005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	< 0.005	0.423	< 0.025	< 0.002
	2/26/2019	0.38	79	55	0.25	7.18	52	490	< 0.003	0.0013	0.033	< 0.001	< 0.005	< 0.005	< 0.001	0.0012	< 0.01	< 0.0002	< 0.005	0.366	< 0.025	< 0.002
	4/30/2019	0.36	74	48	0.25	7.08	35	380	< 0.003	< 0.001	0.026	< 0.001	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	< 0.005	< 0.684	< 0.025	< 0.002	
	8/26/2019	0.64	91	60	0.24	7.08	14	490	< 0.003	< 0.001	0.032	< 0.001	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.008	1.090	< 0.025	< 0.002	
	2/24/2020	0.34	81	49	0.20	7.05	67	440	< 0.003	< 0.001	0.024	<^> 0.001	< 0.005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	< 0.005	0.595	< 0.025	< 0.002
	4/28/2020	0.55	76	52	0.27	7.03	47	380	NA	< 0.001	0.025	NA	< 0.005	< 0.001	< 0.0005	NA	NA	< 0.005	< 0.465	< 0.025	NA	
	12/9/2020	0.57	92	88	0.32	7.10	94	580	NA	< 0.001	0.034	NA	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.0076	< 0.411	< 0.025	NA	
	5/11/2021	0.61	77	44	0.33	7.22	76	410	< 0.003	< 0.001	0.025	< 0.001	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	< 0.005	0.533	< 0.025	< 0.002	
	8/24/2021	0.72	78	48	0.34	7.12	15	100	< 0.003	< 0.001	0.024	< 0.001	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.014	< 0.427	< 0.025	< 0.002	
	11/30/2021	0.51	99	56	0.25	6.95	~ 62	560	< 0.003	0.0012	0.035	< 0.001	< 0.005	< 0.001	< 0.0005	0.0035	< 0.002	< 0.005	< 0.419	< 0.025	< 0.002	
	2/8/2022	0.47	88	59	0.29	7.15	52	580	< 0.003	< 0.001	0.03	< 0.001	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.006	0.818	< 0.025	< 0.002	
	6/7/2022	0.48	73	43	0.3	7.31	30	320	< 0.003	< 0.001	0.025	< 0.001	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.0051	< 0.473	< 0.025	< 0.002	
	8/30/2022	0.67	94	61	0.21	6.80	67	720	< 0.003	< 0.001	0.034	<^> 0.001	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	< 0.005	< 0.546	< 0.025	< 0.002	
	11/14/2022	0.84	110	62	0.2	6.85	41	570	< 0.003	< 0.001	0.08	< 0.001	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	< 0.005	< 0.583	< 0.0074	< 0.002	
	2/21/2023	0.75	89	54	0.22	7.58	54	540	< 0.0030	< 0.0010	0.035	< 0.0010	< 0.0050	< 0.0010	< 0.0005	< 0.01	< 0.0002	< 0.0050	< 0.567	< 0.0037	< 0.0020	
	5/16/2023	0.66	100	51	0.270	7.21	120	550	< 0.0030	< 0.0010	0.034	<^+> 1+ < 0.010	< 0.0050	< 0.0010	< 0.0005	< 0.01	< 0.0002	< 0.0050	< 0.624	< 0.025	< 0.0020	
	8/28/2023	0.78	95	72	0.24	7.02	110	610	< 0.0020	< 0.0020	0.062	< 0.0010	< 0.0050	< 0.0010	< 0.0005	< 0.01	< 0.0002	< 0.0020	< 0.669	< 0.005	< 0.0010	
	11/7/2023	0.78	100	59	0.21	7.01	150	620	< 0.0030	< 0.0010	0.065	< 0.0010	< 0.0050	< 0.0010	< 0.0005	< 0.01	< 0.0002	< 0.0050	0.679	< 0.0070	< 0.0020	
	2/22/2024	0.61	96	60	0.23	7.29	63	520	< 0.0030	< 0.0010	0.041	< 0.0010	< 0.0050	< 0.0010	< 0.0005	< 0.01	< 0.0002	< 0.0050	< 0.479	< 0.0042	< 0.0020	
	6/19/2024	1.3	120	57	0.30	6.77	150	670	< 0.0030	< 0.0010	0.049	< 0.0010	< 0.0050	< 0.0010	< 0.0005	< 0.01	< 0.0002	< 0.0050	< 0.725	< 0.0025	< 0.0020	
	9/10/2024	1.6	100	62	0.18	6.96	110	590	< 0.0030	< 0.0010	0.062	< 0.0010	< 0.0050	< 0.0010	< 0.0005	< 0.01	< 0.0002	< 0.0050	0.712	< 0.0025	< 0.0020	
	11/19/2024	1.8	120	68	0.18	6.93	120	640	< 0.0030	< 0.0010	0.070	< 0.0010	< 0.0050	< 0.0010	< 0.0005	< 0.01	< 0.0002	< 0.0050	< 0.375</td			

Table 2. Groundwater Analytical Results - Midwest Generation, LLC, Powerton Station, Pekin, IL. Sand and Gravel Unit.

Well	Date	Boron	Calcium	Chloride	Fluoride	pH	Sulfate	Total Dissolved Solids	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Lead	Lithium	Mercury	Molybdenum	Radium 226 + 228	Selenium	Thallium
GWPS		4.7	NSP	200	4	6.5-9.0	400	1200	0.0060	0.01	2	0.0040	0.00500	0.1000	0.0060	0.0075	0.040	0.00200	0.1000	5.00	0.050	0.0020
MW-10 upgradient	6/22/2017	0.46	100	48	0.19	6.81	54	1.0	< 0.003	0.0023	0.250	< 0.001	< 0.005	< 0.005	0.008	0.003	< 0.01	< 0.002	< 0.005	0.408	0.0042	< 0.002
	8/24/2017	0.32	93	51	0.18	7.14	57	480	< 0.003	0.0020	0.220	< 0.001	< 0.005	< 0.005	0.007	0.003	< 0.01	< 0.002	< 0.005	0.564	0.0044	< 0.002
	11/9/2017	0.36	98	48	0.18	6.78	64	500	< 0.003	< 0.0010	0.220	< 0.001	< 0.005	< 0.005	0.004	< 0.001	< 0.01	< 0.002	< 0.005	1.020	0.0034	< 0.002
	5/16/2018	0.42	93	44	0.19	7.64	80	530	< 0.003	0.0010	0.220	< 0.001	< 0.005	< 0.005	0.021	0.001	< 0.01	< 0.002	< 0.005	1.550	0.0050	< 0.002
	8/8/2018	0.39	99	58	0.19	7.10	60	550	< 0.003	0.0012	0.220	< 0.001	< 0.005	< 0.005	0.014	0.001	< 0.01	< 0.002	< 0.005	< 0.551	0.0062	< 0.002
	10/30/2018	0.34	110	49	0.22	7.65	49	510	< 0.003	0.010	0.410	< 0.001	0.0008	0.024	0.047	0.023	0.02	< 0.002	< 0.005	3.00	0.0046	< 0.002
	2/26/2019	0.39	150	48	0.21	6.77	36	540	< 0.003	0.0220	0.590	< 0.005	0.0015	0.063	0.081	0.036	0.03	< 0.002	0.007	4.130	0.0041	< 0.002
	5/1/2019	0.35	92	50	0.22	6.81	30	470	< 0.003	0.0023	0.270	< 0.001	< 0.005	< 0.005	0.011	0.0028	< 0.01	< 0.002	< 0.005	1.330	0.0037	< 0.002
	8/26/2019	0.30	84	48	0.19	7.09	30	410	< 0.003	0.0017	0.190	< 0.001	< 0.001	< 0.005	0.007	0.0016	< 0.01	< 0.002	< 0.005	1.540	0.0050	< 0.002
	2/25/2020	1.40	110	45	0.23	6.82	59	500	< 0.003	0.0033	0.280	< 0.001	< 0.005	0.0086	0.011	0.0046	< 0.01	< 0.002	< 0.005	1.07	0.0058	< 0.002
	4/28/2020	1.00	110	41	0.24	6.80	64	550	NA	0.0022	0.250	NA	NA	< 0.005	0.0065	0.0017	NA	NA	< 0.005	0.639	0.0054	NA
	12/8/2020	2.40	120	44	0.26	7.11	71	550	NA	0.0015	0.280	NA	NA	< 0.005	0.0089	0.0023	NA	< 0.002	< 0.005	1.76	0.0031	NA
	5/11/2021	0.64	100	52	0.24	7.01	59	540	< 0.003	0.0011	0.260	< 0.001	< 0.005	< 0.005	0.008	0.00085	< 0.01	< 0.002	< 0.005	1.42	0.0049	< 0.002
	8/24/2021	0.42	98	53	0.21	6.87	46	420	< 0.003	0.0017	0.24	< 0.001	< 0.005	< 0.005	0.0082	0.002	< 0.01	< 0.002	< 0.005	0.638	0.0051	< 0.002
	11/30/2021	0.42	100	47	0.19	6.99	~ 36	530	< 0.003	0.0015	0.2	< 0.001	< 0.005	< 0.005	0.0037	0.00051	< 0.002	< 0.005	1.39	< 0.025	< 0.002	
	2/9/2022	0.41	94	48	0.22	6.88	50	530	< 0.003	0.011	0.6	< 0.001	0.0064	0.026	0.054	0.021	0.011	< 0.002	< 0.005	6.51	0.0045	< 0.002
	3/29/22 R	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	0.811	NS	NS
	6/7/2022	0.43	85	44	0.21	7.09	38	390	< 0.003	0.0011	0.18	< 0.001	< 0.005	< 0.005	0.0028	< 0.0005	< 0.01	< 0.002	< 0.005	0.687	0.0049	< 0.002
	8/30/2022	0.38	92	45	0.22	6.83	38	590	< 0.003	0.0012	0.24	< 0.001	< 0.005	< 0.005	0.0086	0.00074	< 0.01	< 0.002	< 0.005	1.4	< 0.025	< 0.002
	11/15/2022	0.44	99	49	0.28	7.03	48	470	< 0.003	< 0.001	0.2	< 0.001	< 0.005	< 0.005	0.0052	< 0.0005	< 0.01	< 0.002	< 0.005	0.909	< 0.025	< 0.002
	2/22/2023	1.3	100	40	0.22	7.57	66	510	< 0.0030	0.0010	0.22	< 0.0010	< 0.0050	< 0.0050	0.0039	0.00057	< 0.010	< 0.0020	< 0.0050	0.753	0.0040	< 0.0020
	5/17/2023	1.8	130	34	0.25	7.07	84	610	< 0.0030	0.0017	0.32	< 0.0010	< 0.0050	< 0.0050	0.012	0.0018	< 0.010	< 0.0020	< 0.0050	2.52	0.0047	< 0.0020
	8/29/2023	1.3	96	56	0.29	7.00	50	510	< 0.0020	< 0.002	0.2	< 0.0010	< 0.0020	< 0.0050	0.0042	0.00083	< 0.010	< 0.0020	< 0.0020	< 0.667	< 0.0010	< 0.0020
	11/7/2023	2.4	110	42	0.31	7.11	150	630	< 0.0030	0.0015	0.25	< 0.0010	< 0.0050	< 0.0050	0.0081	0.0019	< 0.010	< 0.0020	< 0.0050	1.91	0.0043	< 0.0020
	2/21/2024	6.5	110	37	0.26	7.21	150	660	< 0.0030	0.0014	0.27	< 0.0010	< 0.0050	< 0.0050	0.0045	0.0017	< 0.010	< 0.0020	< 0.0050	< 0.664	0.0062	< 0.0020
	6/19/2024	5.8	130	35	0.28	6.95	150	710	< 0.0030	0.0012	0.25	< 0.0010	< 0.0050	< 0.0050	0.0071	0.0014	< 0.010	< 0.0020	< 0.0050	1.34	0.0066	< 0.0020
	9/11/2024	2.9	110	53	0.29	6.94	72	590	< 0.0030	0.0011	0.23	< 0.0010	< 0.0050	< 0.0050	0.0067	0.00084	< 0.010	< 0.0020	< 0.0050	1.33	0.0047	< 0.0020
	11/21/2024	0.87	22	62	0.30	7.16	39	510	< 0.0030	< 0.0010	0.049	< 0.0010	< 0.0050	< 0.0050	< 0.0010	< 0.00050	< 0.010	< 0.0020	< 0.0050	0.958	< 0.025	< 0.0020
MW-21D downgradient	6/17/2024	2.0	81	73	0.41	7.09	140															

Table 3 - Groundwater Turbidity - Midwest Generation, LLC, Powerton Station, Pekin, IL. Silty Clay/Silt Unit.

Well	Date	Turbidity (NTU)
MW-16	6/18/2024	13.04
	9/11/2024	8.22
	11/20/2024	5.80
MW-06	6/18/2024	11.22
	9/10/2024	12.45
	11/19/2024	8.99
MW-14	2/24/2021	13.9
	4/8/2021	5.39
	5/12/2021	1.22
	6/3/2021	2.63
	6/28/2021	3.74
	7/20/2021	4.34
	8/23/2021	4.26
	10/1/2021	10.27
	11/29/2021	12.29
	2/9/2022	8.66
	6/8/2022	19.54
	8/31/2022	40.75
	11/17/2022	31.69
	2/21/2023	7.33
	5/17/2023	7.08
	8/29/2023	1.95
	11/6/2023	34.43
	2/20/2024	6.79
	6/18/2024	8.71
	9/9/2024	8.64
	11/18/2024	16.95
MW-18A	9/12/2024	85.61
	11/19/2024	34.77
MW-22	6/20/2024	12.39
	9/12/2024	18.30
	11/20/2024	5.85

Table 4. Groundwater Turbidity - Midwest Generation, LLC, Powerton Station, Pekin, IL. Sand and Gravel Unit.

Well	Date	Turbidity (NTU)
MW-16	6/18/2024	13.04
	9/11/2024	8.22
	11/20/2024	5.80
MW-01	2/23/2021	78.20
	4/9/2021	6.96
	5/11/2021	3.24
	6/2/2021	3.8
	6/28/2021	4.30
	7/19/2021	4.88
	8/24/2021	3.34
	9/30/2021	3.04
	11/30/2021	5.43
	2/9/2022	11.5
	6/7/2022	3.63
	8/30/2022	4.73
	11/15/2022	3.9
	2/22/2023	4.54
	5/17/2023	4.33
	8/29/2023	4.40
	11/7/2023	2.93
MW-02	2/21/2024	17.88
	6/19/2024	10.24
	9/11/2024	8.24
	11/21/2024	3.44
	2/22/2021	19.60
	4/8/2021	4.55
	5/11/2021	1.82
	6/2/2021	2.06
	6/28/2021	2.67
	7/19/2021	3.56
	8/24/2021	5.23
	10/1/2021	2.76
	11/30/2021	0
	2/8/2022	0
	6/7/2022	2.03
	8/30/2022	2.46
	11/14/2022	29.35
MW-03	2/21/2023	2.63
	5/16/2023	62.49
	8/28/2023	1.70
	11/7/2023	2.63
	2/22/2024	22.00
	6/19/2024	8.34
	9/10/2024	7.53
	11/19/2024	3.32
	2/22/2021	8.20
	4/8/2021	4.00
	5/11/2021	2.68
	6/2/2021	3.63
	6/28/2021	3.32
	7/19/2021	4.22
	8/24/2021	5.75
MW-04	10/1/2021	2.45
	11/30/2021	0.0
	2/8/2022	0.0
	6/7/2022	1.72
	8/30/2022	2.67
	11/14/2022	4.03
	2/21/2023	2.33
	5/16/2023	6.94
	8/28/2023	1.45
	11/7/2023	2.29
	2/22/2024	10.24
	6/19/2024	7.26
	9/10/2024	8.64
	11/19/2024	3.83
	2/22/2021	4.20
	4/8/2021	4.05
	5/11/2021	4.33
	6/2/2021	2.12
	6/28/2021	8.21
	7/19/2021	3.84
	8/24/2021	2.92
	10/1/2021	2.72
	11/30/2021	0
	2/8/2022	11.09
	6/7/2022	1.62
	8/30/2022	4.05
	11/14/2022	20.7
	2/21/2023	3.7
	5/16/2023	2.5
	8/28/2023	5.59
	11/7/2023	3.48
	2/22/2024	15.41
	6/19/2024	12.81
	9/10/2024	7.64
	11/19/2024	3.26

Table 4. Groundwater Turbidity - Midwest Generation, LLC, Powerton Station, Pekin, IL. Sand and Gravel Unit.

Well	Date	Turbidity (NTU)
MW-05	2/22/2021	1.72
	4/8/2021	4.00
	5/11/2021	1.82
	6/2/2021	1.88
	6/28/2021	3.49
	7/19/2021	8.39
	8/24/2021	3.2
	10/1/2021	3.12
	11/30/2021	0
	2/8/2022	0
	6/7/2022	2.33
	8/30/2022	2.7
	11/14/2022	2.05
	2/21/2023	2.16
	5/16/2023	2.55
	8/28/2023	1.5
	11/7/2023	2.5
	2/22/2024	7.08
	6/19/2024	7.56
	9/10/2024	8.7
	11/19/2024	3.18
MW-07	6/18/2024	40.69
	9/10/2024	17.49
	11/20/2024	25.87
MW-10	2/23/2021	257.70
	4/9/2021	54.91
	5/11/2021	24.74
	6/2/2021	6.02
	6/28/2021	14.11
	7/19/2021	17.53
	8/24/2021	41.55
	9/30/2021	17.07
	11/30/2021	11.92
	2/9/2022	224.6
	6/7/2022	7.88
	8/30/2022	13.34
	11/15/2022	23.18
	2/22/2023	14.31
	5/17/2023	30.7
	8/29/2023	31.79
	11/7/2023	20.85
	2/21/2024	29.67
	6/19/2024	22.65
	9/11/2024	31.08
	11/21/2024	18.30
MW-21D	6/17/2024	162.37
	9/10/2024	22.92
	11/18/2024	72.04

Table 5. Groundwater Elevations for CCR Permit Wells and Piezometers - Midwest Generation, LLC, Powertron Station, Pekin, IL

Well ID	Date	Top of Casing Elevation (ft above MSL) <sup>a</sup>	Depth to Groundwater (ft below TDC)	Groundwater Elevation (ft above MSL)	Illinois River Gage Reading <sup>b</sup> (ft above datum)	Illinois River Gage Reading <sup>c</sup> (ft above MSL)
MW-06 down-gradient	5/11/2015	464.47	17.26	447.21	11.61	438.78
	8/15/2015	464.47	15.85	445.82	4.68	431.55
	11/16/2015	464.47	19.11	445.36	4.38	431.55
	2/22/2016	464.50	17.11	447.79	7.97	435.14
	5/16/2016	464.50	17.80	446.70	14.53	441.17
	8/15/2016	464.50	14.13	450.37	7.11	434.28
	11/14/2016	464.50	15.06	449.44	6.35	433.52
	2/13/2017	464.50	15.77	450.73	NA	NA
	5/2/2017	464.50	14.15	450.38	17.09	444.26
	8/24/2017	464.50	16.09	448.41	3.84	431.03
	11/18/2017	464.50	16.76	447.74	6.89	434.06
	3/6/2018	464.50	15.00	449.50	NA	NA
	5/10/2018	464.50	15.82	448.68	9.93	431.1
	8/10/2018	464.50	14.29	450.21	2.13	429.3
	10/29/2018	464.50	16.67	448.83	4.21	431.38
	2/25/2019	464.50	14.98	449.52	16.74	443.91
	4/29/2019	464.50	15.87	448.63	14.04	441.21
	8/26/2019	464.50	15.31	449.19	3.41	430.78
	11/11/2019	464.50	15.16	449.34	15.92	443.09
	2/24/2020	464.50	15.83	448.67	12.84	440.01
	4/27/2020	464.50	15.36	449.14	12.64	439.81
	8/10/2020	464.50	17.70	446.80	4.29	431.46
	12/27/2020	464.50	16.00	448.50	2.91	430.14
	2/22/2021	464.50	15.58	448.92	6.21	433.38
	5/10/2021	464.50	15.35	449.15	10.71	437.88
	8/23/2021	464.50	16.05	448.45	3.47	430.66
	11/29/2021	464.50	16.85	447.65	5.17	432.34
	2/7/2022	464.50	17.14	446.36	4.4	431.57
	4/6/2022	464.50	17.06	447.14	8.21	429.59
	8/29/2022	464.50	17.50	447.00	2.55	429.72
	11/14/2022	464.50	17.96	446.54	3.2	430.37
	2/20/2023	464.50	17.27	447.23	7.6	434.77
	5/15/2023	464.50	17.17	447.33	8.78	435.95
	8/28/2023	464.50	17.86	446.64	3.28	430.43
	11/13/2023	464.50	18.85	445.65	3.65	430.82
	1/24/2024	464.50	18.59	445.91	12.92	440.09
	4/29/2024	464.50	18.13	446.37	12.74	439.91
	7/26/2024	464.50	17.28	447.22	10.1	437.27
	10/12/2024	464.50	16.94	447.56	16.79	435.96
	1/19/2025	464.50	16.20	448.30	15.59	443.07
	4/7/2025	464.50	16.26	448.24	12.03	439.2
	7/25/2025	464.50	16.00	448.50	12.63	438.65
	10/19/2025	464.50	15.91	448.59	11.76	438.93
	1/6/2026	464.50	16.09	448.41	11.82	438.99
	4/19/2026	464.50	16.16	448.34	2.16	429.33
	7/18/2026	464.50	16.26	448.24	4.14	431.31
	10/13/2026	464.50	17.26	447.24	2.8	429.97
	11/16/2015	473.80	24.48	448.90	4.38	431.55
	2/21/2016	473.80	21.41	451.97	7.97	435.14
	5/14/2016	473.80	22.94	450.44	14.53	441.7
	8/14/2016	473.80	23.85	449.53	7.11	434.28
	11/9/2016	473.80	23.89	449.49	8.55	433.52
	2/13/2017	473.80	21.93	451.85	NA	NA
	5/1/2017	473.80	22.26	451.12	17.09	444.26
	6/29/2017	473.80	22.76	450.62	11.93	439.1
	8/26/2017	473.80	23.92	449.46	3.86	431.03
	11/10/2017	473.80	24.29	449.09	6.89	434.06
	2/19/2018	473.80	22.46	450.92	9.81	431.1
	5/10/2018	473.80	23.78	449.60	2.13	429.3
	7/11/2018	473.80	23.74	449.64	4.21	431.21
	10/24/2018	473.80	22.05	451.33	14.04	441.21
	11/10/2019	473.80	22.85	450.53	15.92	443.09
	4/7/2020	473.80	21.44	451.94	12.64	439.81
	7/17/2020	473.80	22.70	450.68	2.97	430.14
	10/27/2020	473.80	21.00	452.38	6.21	433.38
	2/22/2021	473.80	21.91	451.47	10.23	437.14
	5/10/2021	473.80	22.50	450.88	10.71	437.88
	6/2/2021	473.80	22.60	450.78	10.7	437.87
	6/28/2021	473.80	22.95	450.43	12.11	439.28
	7/19/2021	473.80	22.99	450.39	15.06	442.23
	8/23/2021	473.80	23.48	449.90	3.49	430.66
	9/9/2021	473.80	23.87	449.51	2.49	429.66
	10/27/2021	473.80	23.90	449.48	11.08	440.21
	11/29/2021	473.80	23.33	450.08	5.11	432.34
	2/12/2022	473.80	22.95	450.43	6.68	433.85
	4/6/2022	473.80	22.77	450.61	6.45	433.62
	7/25/2022	473.80	22.03	451.38	4.4	431.57
	9/1/2022	473.80	21.74	451.04	16.04	444.21
	4/22/2023	473.80	22.03	451.35	NA	NA
	5/24/2023	473.80	22.36	451.02	11.42	430.59
	6/6/2023	473.80	22.65	450.73	8.21	435.38
	7/25/2023	473.80	23.29	450.09	5.34	432.53
	8/29/2023	473.80	23.84	449.54	2.55	429.72
	9/26/2023	473.80	24.13	449.25	2.37	429.54
	10/24/2023	473.80	24.28	449.10	4.36	431.53
	11/14/2023	473.80	24.15	449.23	1.2	440.13
	12/29/2023	473.80	22.41	450.97	NA	NA
	1/24/2023	473.80	21.68	451.70	7.29	434.46
	2/29/2023	473.80	21.36	452.02	7.6	434.77
	3/23/2023	473.80	21.07	451.31	14.9	442.09
	4/25/2023	473.80	21.53	451.85	9.4	436.57
	5/15/2023	473.80	21.88	451.50	8.78	435.95
	6/29/2023	473.80	22.87	450.51	2.42	429.59
	7/25/2023	473.80	22.99	450.39	3.67	430.84
	8/28/2023	473.80	23.12	450.26	3.26	430.43
	9/26/2023	473.80	23.50	449.88	3.35	430.52
	10/23/2023	473.80	23.88	449.50	3.98	431.15
	11/10/2023	473.80	23.88	449.50	3.88	430.82
	12/21/2023	473.80	22.72	450.66	6.12	433.29
	1/24/2024	473.80	21.70	451.68	12.92	440.09
	2/10/2024	473.80	21.51	451.87	12.74	439.91
	3/26/2024	473.80	21.67	451.71	10.10	437.27
	4/12/2024	473.80	21.51	451.87	16.79	443.95
	5/15/2024	473.80	21.30	451.65	15.9	443.09
	6/17/2024	473.80	22.10	450.85	12.03	439.2
	7/26/2024	473.80	22.00	450.34	12.63	439.9
	8/21/2024	472.95	22.92	450.03	11.76	438.93
	9/6/2024	472.95	22.72	450.23	11.82	438.99
	10/29/2024	472.95	23.80	449.15	2.16	429.33
	11/16/2024	472.95	23.27	449.68	4.14	431.31
	12/10/2024	472.95	23.56	449.39	2.8	429.97

Table 5. Groundwater Elevations for CCR Permit Wells and Piezometers - Midwest Generation, LLC, Powerton Station, Pekin, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TDS)	Groundwater Elevation (ft above datum)	Illinois River Gage Reading <sup>a</sup> (ft above MSL)	Illinois River Gage Reading <sup>b</sup> (ft above MSL)
MW-14 down-gradient	2/22/2021	470.79	25.43	445.36	6.21	433.38
	4/7/2021	470.79	24.46	446.33	10.23	437.4
	5/10/2021	470.79	24.86	445.93	10.71	437.88
	6/2/2021	470.79	24.20	446.59	10.7	437.87
	6/28/2021	470.79	24.45	446.34	12.11	439.28
	7/19/2021	470.79	24.04	446.75	15.06	442.23
	8/23/2021	470.79	24.58	446.21	3.49	430.66
	9/30/2021	470.79	25.35	445.44	2.49	429.66
	10/25/2021	470.79	25.41	445.38	13.08	440.25
	11/19/2021	470.79	24.68	446.11	5.17	432.34
	12/30/2021	470.79	25.05	445.74	6.68	433.85
	1/6/2022	470.90	22.02	448.88	6.45	433.62
	2/7/2022	470.90	25.64	445.26	4.4	431.57
	3/1/2022	470.90	25.36	445.54	16.04	443.21
	4/22/2022	470.90	23.82	447.08	NA	NA
	5/24/2022	470.90	24.08	446.82	11.42	438.59
	6/6/2022	470.90	24.10	446.80	8.21	435.38
	7/25/2022	470.90	25.07	445.83	5.36	432.53
	8/29/2022	470.90	26.30	442.00	2.55	429.72
	9/28/2022	470.90	30.29	440.61	2.37	429.54
	10/19/2022	470.90	31.23	439.67	4.36	431.53
	11/14/2022	470.90	31.58	439.32	3.2	430.37
	12/26/2022	470.90	32.05	438.85	NA	NA
	1/24/2023	470.90	31.48	439.42	7.29	434.46
	2/20/2023	470.90	30.91	439.99	7.6	434.77
	3/26/2023	470.90	25.14	445.76	14.9	442.07
	4/25/2023	470.90	24.56	446.34	9.4	436.57
	5/15/2023	470.90	24.41	446.49	8.78	435.95
	6/26/2023	470.90	25.18	445.72	2.42	429.59
	7/25/2023	470.90	25.61	445.29	3.67	430.84
	8/28/2023	470.90	29.02	441.88	3.26	430.43
	9/28/2023	470.90	31.94	438.96	3.35	430.52
	10/7/2023	470.90	31.18	439.72	3.98	431.15
	11/6/2023	470.90	31.26	439.64	3.65	430.82
	12/21/2023	470.90	31.63	439.27	6.12	433.29
	1/24/2024	470.90	30.33	440.57	12.92	440.09
	2/19/2024	470.90	24.73	446.17	12.74	439.91
	3/26/2024	470.90	24.81	446.09	10.1	437.27
	4/12/2024	470.90	24.62	446.28	16.79	443.96
	5/15/2024	470.90	23.72	447.18	15.9	443.07
	6/17/2024	470.90	24.07	446.83	12.03	439.2
	7/25/2024	470.90	24.40	446.50	12.63	439.8
	8/21/2024	470.90	24.56	446.34	11.76	438.93
	9/9/2024	470.90	24.85	446.05	11.82	438.99
	10/9/2024	470.90	25.74	445.16	2.16	429.33
	11/18/2024	470.90	25.91	444.99	4.14	431.31
	12/10/2024	470.90	25.77	445.13	2.8	429.97
MW-15 down-gradient	11/16/2015	471.37	25.33	446.04	4.38	431.55
	2/22/2016	471.37	22.91	446.46	7.97	435.14
	5/16/2016	471.37	24.71	446.66	14.53	441.7
	8/15/2016	471.37	23.45	447.92	7.11	434.28
	11/14/2016	471.37	23.94	447.43	6.35	433.52
	2/13/2017	471.37	23.73	447.64	NA	NA
	5/1/2017	471.37	23.27	448.10	17.09	444.26
	6/20/2017	471.37	22.86	448.51	11.93	439.1
	8/29/2017	471.37	23.13	448.24	3.86	431.03
	11/20/2017	471.37	25.13	446.24	6.89	434.06
	5/17/2018	471.37	23.85	447.52	9.93	437.1
	8/9/2018	471.37	23.96	447.41	2.13	429.3
	10/11/2018	471.37	24.55	446.82	4.21	431.38
	4/29/2019	471.37	23.57	447.80	14.04	441.21
	11/11/2019	471.37	23.79	447.58	15.92	443.09
	4/27/2020	471.37	23.95	447.42	12.64	439.81
	12/7/2020	471.37	25.01	446.36	2.97	430.14
	2/22/2021	471.37	27.74	443.63	6.21	433.38
	4/7/2021	471.37	24.44	446.93	10.23	437.4
	5/10/2021	471.37	24.62	446.75	10.71	437.88
	6/2/2021	471.37	24.12	447.25	10.7	437.87
	6/28/2021	471.37	24.19	447.18	12.11	439.28
	7/19/2021	471.37	24.01	447.36	15.06	442.23
	8/23/2021	471.37	24.38	446.99	3.49	430.66
	9/30/2021	471.37	24.91	446.46	2.49	429.66
	4/22/2022	471.37	24.18	447.19	NA	NA
	5/24/2022	471.37	24.27	447.10	11.42	438.59
	6/6/2022	471.37	24.29	447.08	8.21	435.38
	7/25/2022	471.37	25.05	446.32	5.36	432.53
	8/29/2022	471.37	25.45	445.92	2.55	429.72
	9/28/2022	471.37	25.54	445.83	2.37	429.54
	10/19/2022	471.37	26.00	445.37	4.36	431.53
	11/14/2022	471.37	26.14	445.23	3.2	430.37
	12/26/2022	471.37	27.84	443.53	NA	NA
	1/24/2023	471.37	25.26	446.11	7.29	434.46
	2/20/2023	471.37	25.24	446.13	7.6	434.77
	3/26/2023	471.37	24.81	446.56	14.9	442.07
	4/25/2023	471.37	24.56	446.81	9.4	436.57
	5/15/2023	471.37	24.64	446.73	8.78	435.95
	6/26/2023	471.37	25.18	446.19	2.42	429.59
	7/25/2023	471.37	25.53	445.84	3.67	430.84
	8/28/2023	471.37	25.60	445.77	3.26	430.43
	9/26/2023	471.37	25.78	445.59	3.35	430.52
	10/7/2023	471.37	26.00	445.37	3.98	431.15
	11/6/2023	471.37	26.04	445.33	3.65	430.82
	12/21/2023	471.37	25.86	445.51	6.12	433.29
	1/24/2024	471.37	25.19	446.18	12.92	440.09
	2/19/2024	471.37	24.52	446.85	12.74	439.91
	3/26/2024	471.37	24.44	446.93	10.10	437.27
	4/12/2024	471.37	24.35	447.02	16.79	443.96
	5/15/2024	471.37	23.89	447.48	15.9	443.07
	6/17/2024	471.37	24.08	447.29	12.03	439.2
	7/25/2024	471.37	24.23	447.14	12.63	439.8
	8/21/2024	471.37	24.28	447.09	11.76	438.93
	9/9/2024	471.37	24.48	446.89	11.82	438.99
	10/9/2024	471.37	25.12	446.25	2.16	429.33
	11/18/2024	471.37	25.01	446.36	4.14	431.31
	12/10/2024	471.37	25.13	446.24	2.8	429.97

Table 5. Groundwater Elevations for CCR Permit Wells and Piezometers - Midwest Generation, LLC, Powertron Station, Pekin, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TDS)	Groundwater Elevation (ft above datum)	Illinois River Gage Reading <sup>a</sup> (ft above datum)	Illinois River Gage Reading <sup>b</sup> (ft above MSL)
MW-17	11/16/2015	467.75	26.92	440.83	4.38	431.55
down-gradient	3/22/2016	467.75	19.86	447.89	7.97	435.14
	5/16/2016	467.75	20.42	447.33	14.53	441.7
	8/18/2016	467.75	21.61	446.14	7.11	434.28
	11/14/2017	467.75	21.39	446.36	6.35	433.52
	2/13/2017	467.75	19.66	448.09	NA	NA
	5/1/2017	467.75	18.78	448.97	17.09	444.26
	6/20/2017	467.75	19.42	448.33	11.93	439.1
	8/29/2017	467.75	22.68	445.07	3.86	431.03
	11/6/2017	467.75	24.66	443.09	6.89	434.06
	3/14/2018	467.75	19.79	447.96	9.93	437.1
	8/6/2018	467.75	21.03	446.72	2.13	429.3
	10/4/2018	467.75	21.98	445.77	4.21	431.38
	4/29/2019	467.75	18.75	449.00	14.04	441.21
	11/1/2019	467.75	19.00	448.15	15.92	443.09
	4/27/2020	467.75	19.15	448.60	12.64	439.81
	12/7/2020	467.75	24.12	443.63	2.97	430.14
	2/22/2021	467.75	20.22	447.53	6.21	433.38
	4/7/2021	467.75	19.69	448.06	10.23	437.4
	5/10/2021	467.75	20.00	447.75	10.71	437.88
	6/2/2021	467.75	19.65	448.10	10.7	437.87
	6/28/2021	467.75	19.98	447.77	12.11	439.28
	7/19/2021	467.75	19.57	448.18	15.06	442.23
	8/23/2021	467.75	20.15	447.60	3.49	430.66
	9/30/2021	467.75	23.25	444.50	2.49	429.66
	10/20/2021	467.75	23.35	444.40	13.08	440.25
	11/2/2021	467.75	20.64	447.11	5.17	432.34
	12/9/2021	467.75	22.61	445.14	6.68	433.85
	1/6/2022	467.75	23.19	444.56	6.45	433.62
	2/7/2022	467.75	22.03	445.72	4.4	431.57
	3/1/2022	467.75	19.97	447.78	16.04	443.21
	4/22/2022	467.75	19.36	448.39	NA	NA
	5/24/2022	467.75	19.38	448.37	11.42	438.59
	6/6/2022	467.75	19.45	448.30	8.21	435.38
	7/25/2022	467.75	20.39	447.36	5.36	432.53
	8/29/2022	467.75	23.75	444.00	2.55	429.72
	9/28/2022	467.75	25.38	442.37	2.37	429.54
	10/16/2022	467.75	27.49	440.26	4.36	431.53
	11/14/2022	467.75	27.73	440.02	3.2	430.37
	12/28/2022	467.75	27.47	440.28	NA	NA
	1/24/2023	467.75	23.08	444.67	7.29	434.46
	2/20/2023	467.75	20.29	447.46	7.6	434.77
	3/26/2023	467.75	19.43	448.32	14.9	442.07
	4/25/2023	467.75	19.31	448.44	9.4	436.57
	5/15/2023	467.75	19.60	448.15	8.78	435.95
	6/26/2023	467.75	20.42	447.33	2.42	429.59
	7/25/2023	467.75	21.26	446.49	3.67	430.84
	8/28/2023	467.75	21.13	446.62	3.26	430.43
	9/26/2023	467.75	23.65	444.10	3.35	430.52
	10/7/2023	467.75	24.26	443.49	3.98	431.15
	11/6/2023	467.75	24.42	443.33	3.65	430.82
	12/21/2023	467.75	24.85	442.90	6.12	433.29
	1/24/2024	467.75	20.92	446.83	12.92	440.09
	2/19/2024	467.75	19.49	448.26	12.74	439.91
	3/26/2024	467.75	19.69	448.06	10.10	437.27
	4/12/2024	467.75	19.48	448.27	16.79	443.96
	5/15/2024	467.75	19.04	448.71	15.9	443.07
	6/17/2024	467.75	19.42	448.33	12.03	439.2
	7/25/2024	467.75	19.95	447.80	12.63	439.8
	8/21/2024	467.75	20.29	447.46	11.76	438.93
	9/9/2024	467.75	20.75	447.00	11.82	438.99
	10/19/2024	467.75	24.40	443.35	2.16	429.33
	11/18/2024	467.75	25.00	442.75	4.14	431.31
	12/10/2024	467.75	25.21	442.54	2.8	429.97
MW-18	11/16/2015	469.28	28.42	440.86	4.38	431.55
down-gradient	3/22/2016	469.28	27.96	441.32	7.97	435.14
	5/16/2016	469.28	25.57	443.71	14.53	441.7
	8/18/2016	469.28	27.86	441.42	7.11	434.28
	11/14/2017	469.28	27.39	441.89	6.35	433.52
	2/13/2017	469.28	25.06	444.22	NA	NA
	5/1/2017	469.28	22.49	446.79	17.09	444.26
	6/20/2017	469.28	24.97	444.31	11.93	439.1
	8/28/2017	469.28	27.30	441.98	3.86	431.03
	11/6/2017	469.28	26.33	442.95	6.89	434.06
	3/14/2018	469.28	24.05	444.63	9.93	437.1
	8/6/2018	469.28	25.67	443.61	2.13	429.3
	10/4/2018	469.28	25.79	443.49	4.21	431.38
	4/29/2019	469.28	23.00	446.28	14.04	441.21
	11/1/2019	469.28	23.94	445.34	15.92	443.09
	4/27/2020	469.28	23.97	445.31	12.64	439.81
	12/7/2020	469.28	27.82	441.46	2.97	430.14
	2/22/2021	469.28	26.69	442.59	6.21	433.38
	4/7/2021	469.28	24.94	444.34	10.23	437.4
	5/10/2021	469.28	25.96	443.32	10.71	437.88
	6/2/2021	469.28	24.70	444.58	10.7	437.87
	6/28/2021	469.28	25.60	443.68	12.11	439.28
	7/19/2021	469.28	23.50	445.78	15.06	442.23
	8/23/2021	469.28	27.35	441.93	3.49	430.66
	9/30/2021	469.28	29.70	449.58	2.49	429.66
	10/25/2021	469.28	27.35	441.93	13.08	440.25
	11/2/2021	469.28	26.81	442.47	5.17	432.34
	12/30/2021	469.28	27.14	442.14	6.68	433.85
	1/6/2022	469.28	26.57	442.71	6.45	433.62
	2/7/2022	469.28	27.83	441.45	4.4	431.57
	3/1/2022	469.28	24.45	444.83	16.04	443.21
	4/22/2022	469.28	23.77	445.51	NA	NA
	5/24/2022	469.28	25.04	444.24	11.42	438.59
	6/6/2022	469.28	25.71	443.57	8.21	435.38
	7/25/2022	469.28	28.62	440.66	5.36	432.53
	8/29/2022	469.28	28.66	440.62	2.55	429.72
	9/28/2022	469.28	32.19	437.09	2.37	429.54
	10/16/2022	469.28	33.26	436.02	4.36	431.53
	11/14/2022	469.28	32.95	436.33	3.2	430.37
	12/28/2022	469.28	28.44	440.84	NA	NA
	1/24/2023	469.28	28.65	440.63	7.29	434.46
	2/20/2023	469.28	28.44	440.84	7.6	434.77
	3/26/2023	469.28	26.78	442.50	14.9	442.07
	4/25/2023	469.28	25.35	443.93	9.4	436.57
	5/15/2023	469.28	26.46	442.82	8.78	435.95
	6/26/2023	469.28	30.11	439.17	2.42	429.59
	7/25/2023	469.28	28.93	440.35	3.67	430.84
	8/28/2023	469.28	29.87	439.41	3.26	430.43
	9/26/2023	469.28	30.02	439.26	3.35	430.52
	10/7/2023	469.28	29.29	439.99	3.98	431.15
	11/6/2023	469.28	29.54	439.74	3.65	430.82
	12/21/2023	469.28	28.68	440.60	6.12	433.29
	1/24/2024	469.28	26.47	442.81	12.92	440.09
	2/19/2024	469.28	24.46	444.82	12.74	439.91
	3/26/2024	469.28	26.46	442.82	10.10	437.27
	4/12/2024	469.28	23.98	445.30	16.79	443.96
	5/15/2024	469.28	23.36	445.92	15.9	443.07
	6/17/2024	469.28	26.71	442.57	12.03	439.2
	7/25/2024	469.28	26.15	443.13	12.63	439.8
	8/21/2024	469.28	28.88	440.40	11.76	438.93
	9/9/2024	469.28	30.78	438.50	11.82	438.99
	10/9/2024	469.28	29.16	440.12	2.16	429.33
	11/18/2024	469.28	28.83	440.45	4.14	431.31
	12/10/2024	469.28	30.18	439.10	2.8	429.97

Table 5. Groundwater Elevations for CCR Permit Wells and Piezometers - Midwest Generation, LLC, Powerton Station, Pekin, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TDS)	Groundwater Elevation (ft above MSL)	Illinois River Gage Reading <sup>a</sup> (ft above datum)	Illinois River Gage Reading <sup>b</sup> (ft above MSL)
MW-18A down-gradient	8/21/2024	469.54	35.60	433.94	11.76	438.93
	9/9/2024	469.54	33.53	436.01	11.82	438.99
	10/7/2024	469.54	31.31	438.23	2.16	429.33
	11/5/2024	469.54	30.90	438.64	4.14	431.31
	12/3/2024	469.54	32.72	436.82	2.8	429.97
MW-22 down-gradient	4/12/2024	457.18	12.73	444.45	16.79	443.96
	5/10/2024	457.18	11.66	445.52	15.9	443.07
	6/7/2024	457.18	16.04	441.14	12.03	439.2
	7/5/2024	457.18	16.22	440.96	12.63	439.8
	8/21/2024	457.18	19.28	437.90	11.76	438.93
MW-16 down-gradient	9/9/2024	457.18	21.18	436.00	11.82	438.99
	10/7/2024	457.18	21.81	435.37	2.16	429.33
	11/5/2024	457.18	21.41	435.77	4.14	431.31
	12/3/2024	457.18	21.86	435.32	2.8	429.97
	3/12/2015	471.56	27.02	444.54	12.15	415.02
MW-16 down-gradient	3/18/2015	471.56	22.83	448.73	4.62	422.55
	11/16/2015	471.56	27.63	443.93	4.38	422.79
	2/24/2016	471.55	24.12	447.43	8.02	419.15
	3/16/2016	471.55	25.09	446.46	14.53	412.64
	8/15/2016	471.55	26.42	445.13	7.11	420.06
MW-16 down-gradient	11/14/2016	471.55	26.27	445.28	6.35	420.82
	2/13/2017	471.55	25.38	446.17	NA	NA
	5/2/2017	471.55	23.30	448.25	18.50	408.67
	8/23/2017	471.55	27.11	444.44	3.86	423.31
	11/19/2017	471.55	27.49	444.06	6.70	420.47
MW-16 down-gradient	3/8/2018	471.55	25.56	445.99	19.72	407.45
	5/17/2018	471.55	25.64	445.91	9.93	417.24
	8/8/2018	471.55	27.19	444.36	2.13	425.04
	10/31/2018	471.55	27.72	443.83	4.76	422.41
	2/25/2019	471.55	23.60	447.95	16.74	410.43
MW-16 down-gradient	4/29/2019	471.55	22.97	448.58	14.04	413.13
	8/26/2019	471.55	25.50	446.05	3.61	423.56
	11/11/2019	471.55	23.10	448.45	15.92	411.25
	2/24/2020	471.55	23.59	447.96	12.84	414.33
	4/27/2020	471.55	23.50	448.05	12.64	414.53
MW-16 down-gradient	8/10/2020	471.55	24.70	446.85	4.38	422.79
	12/7/2020	471.55	27.69	443.86	2.97	424.2
	2/22/2021	471.55	27.60	443.95	6.21	420.96
	5/10/2021	471.55	26.25	445.30	10.71	416.46
	8/23/2021	471.55	26.20	445.35	3.49	423.68
MW-16 down-gradient	11/20/2021	471.55	25.71	445.84	5.17	422
	2/7/2022	471.55	27.52	444.03	4.40	422.77
	6/6/2022	471.55	24.50	447.05	8.21	418.96
	8/29/2022	471.55	27.91	445.64	2.55	424.62
	11/14/2022	471.55	29.34	442.21	3.20	423.97
MW-16 down-gradient	2/20/2023	471.55	29.92	441.63	7.60	419.57
	5/15/2023	471.55	26.66	444.89	8.78	418.39
	8/28/2023	471.55	29.30	442.25	3.26	423.91
	11/6/2023	471.55	30.04	441.51	3.65	423.52
	01/24/24	471.56	26.24	448.32	12.92	440.09
MW-16 down-gradient	02/19/24	471.56	20.33	451.23	12.74	439.91
	03/26/24	471.56	26.92	444.64	10.10	437.27
	04/12/24	471.56	26.24	445.32	16.79	443.96
	05/15/24	471.56	24.32	447.24	15.90	443.07
	06/17/24	471.56	25.41	446.15	12.03	439.2
MW-16 down-gradient	07/25/24	471.56	26.50	445.06	12.63	439.8
	08/21/24	471.56	27.41	444.15	11.76	438.93
	09/09/24	471.56	28.24	445.32	11.82	438.99
	10/29/24	471.56	29.54	442.02	2.16	429.33
	11/18/24	471.56	29.46	442.1	4.14	431.31
MW-16 down-gradient	12/10/24	471.56	29.74	441.82	2.80	429.97

Table 5. Groundwater Elevations for CCR Permit Wells and Piezometers - Midwest Generation, LLC, Powerton Station, Peoria, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TDS)	Groundwater Elevation (ft above datum)	Illinois River Gage Reading <sup>1</sup> (ft above datum)	Illinois River Gage Reading <sup>2</sup> (ft above MSL)
MW-01	11/16/2015	465.24	26.04	439.20	4.38	431.55
	3/22/2016	465.24	21.90	443.34	7.97	435.14
	5/16/2016	465.24	21.83	443.41	14.53	441.7
	8/15/2016	465.24	23.89	441.35	7.11	434.28
	11/1/2016	465.24	23.38	441.86	6.35	433.52
	2/1/2017	465.24	21.71	443.53	NA	NA
	5/1/2017	465.24	18.87	446.37	17.09	444.26
	6/20/2017	465.24	21.54	443.70	11.93	439.1
	8/25/2017	465.24	24.70	440.54	3.86	431.03
	11/6/2017	465.24	24.92	440.32	6.89	434.06
	3/17/2018	465.24	22.66	442.58	9.93	437.1
	8/8/2018	465.24	26.05	439.19	2.13	429.3
	10/9/2018	465.24	24.69	440.55	4.21	431.38
	4/29/2019	465.24	20.15	445.09	14.04	441.21
	11/1/2019	465.24	19.49	445.75	15.92	443.09
	4/27/2020	465.24	20.90	444.34	12.64	439.81
	12/7/2020	465.24	25.69	439.55	2.97	430.14
	2/22/2021	465.24	25.18	440.06	6.21	433.38
	4/7/2021	465.24	22.20	443.04	10.23	437.4
	5/10/2021	465.24	23.41	441.83	10.71	437.88
	6/2/2021	465.24	22.00	443.24	10.7	437.87
	6/28/2021	465.24	23.18	442.06	12.11	439.28
	7/19/2021	465.24	20.43	444.81	15.06	442.23
	8/23/2021	465.24	24.42	440.82	3.49	430.66
	9/30/2021	465.24	26.89	438.35	2.49	429.66
	10/7/2021	465.24	24.53	440.71	13.08	440.25
	11/2/2021	465.24	23.31	441.93	5.17	432.34
	12/9/2021	465.24	24.31	440.93	6.68	433.85
	1/6/2022	465.24	24.86	440.38	6.45	433.62
	2/7/2022	465.24	25.57	439.67	4.4	431.57
	3/1/2022	465.24	21.96	443.28	16.04	443.21
	4/22/2022	465.24	20.03	445.21	NA	NA
	5/24/2022	465.24	21.37	443.87	11.42	438.59
	6/6/2022	465.24	22.13	443.11	8.21	435.38
	7/25/2022	465.24	25.48	439.76	5.36	432.53
	8/29/2022	465.24	27.53	437.71	2.55	429.72
	9/28/2022	465.24	26.58	436.66	2.37	429.54
	10/16/2022	465.24	29.75	435.49	4.36	431.53
	11/14/2022	465.24	29.58	435.66	3.2	430.37
	12/26/2022	465.24	26.63	438.61	NA	NA
	1/24/2023	465.24	27.91	437.33	7.29	434.46
	2/29/2023	465.24	26.94	438.30	7.6	434.77
	3/28/2023	465.24	21.74	443.50	14.9	442.07
	4/25/2023	465.24	22.22	443.02	9.4	436.57
	5/15/2023	465.24	23.91	441.33	8.78	435.95
	6/26/2023	465.24	26.66	436.58	2.42	429.59
	7/25/2023	465.24	26.06	437.18	3.67	430.84
	8/28/2023	465.24	28.85	436.39	3.26	430.43
	9/26/2023	465.24	29.42	438.82	3.35	430.52
	10/27/2023	465.24	29.16	436.08	3.98	431.15
	11/6/2023	465.24	29.23	436.01	3.65	430.82
	12/1/2023	465.24	29.21	436.03	6.12	433.29
	1/24/2024	465.24	25.03	440.21	12.92	440.09
	2/19/2024	465.24	21.02	444.22	12.74	439.91
	3/26/2024	465.24	23.38	441.86	10.10	437.27
	4/12/2024	465.24	20.9	444.34	16.79	445.96
	5/15/2024	465.24	19.9	445.34	15.90	445.07
	6/17/2024	465.24	23.31	441.93	12.03	439.2
	7/25/2024	465.24	23.94	441.30	12.63	439.8
	8/21/2024	465.24	26.36	438.88	11.76	438.93
	9/9/2024	465.24	28.58	436.66	11.82	438.99
	10/25/2024	465.24	29.54	435.70	2.16	429.33
	11/18/2024	465.24	29.19	436.05	4.14	431.31
	12/10/2024	465.24	29.55	435.69	2.8	429.97
MW-02	6/20/2017	462.60	22.04	440.56	11.93	439.1
	8/25/2017	462.60	28.42	434.18	3.86	431.03
	11/7/2017	462.60	26.08	436.52	6.89	434.06
	5/17/2018	462.60	23.26	439.34	9.93	437.1
	8/7/2018	462.60	29.70	432.90	2.13	429.3
	10/30/2018	462.60	26.77	435.83	4.21	431.38
	2/25/2019	462.60	17.02	445.58	16.74	443.91
	4/29/2019	462.60	19.26	443.34	14.04	441.21
	8/26/2019	462.60	27.45	435.15	3.61	430.78
	2/24/2020	462.60	20.35	442.25	12.84	440.01
	4/27/2020	462.60	20.51	442.09	12.64	439.81
	12/7/2020	462.60	28.71	433.89	2.97	430.14
	2/22/2021	462.60	25.90	436.70	6.21	433.38
	4/7/2021	462.60	21.95	440.65	10.23	437.4
	5/10/2021	462.60	23.01	439.59	10.71	437.88
	6/2/2021	462.60	21.74	440.86	10.7	437.87
	6/28/2021	462.60	22.74	440.36	17.11	439.28
	7/19/2021	462.60	18.66	443.94	15.06	442.23
	8/21/2021	462.60	27.99	434.65	3.49	430.66
	9/30/2021	462.60	30.44	432.16	2.49	429.66
	10/17/2021	462.60	22.74	439.86	13.08	440.25
	11/29/2021	462.60	25.57	437.03	5.17	432.34
	12/30/2021	462.60	25.11	437.49	6.68	433.85
	1/6/2022	462.60	24.96	437.64	6.45	433.82
	2/7/2022	462.60	27.47	435.13	4.4	431.57
	3/1/2022	462.60	18.06	444.54	16.04	443.21
	4/22/2022	462.60	18.63	443.97	NA	NA
	5/24/2022	462.60	21.44	441.16	11.42	438.59
	6/6/2022	462.60	21.14	441.46	8.21	435.38
	7/25/2022	462.60	29.28	433.32	5.36	432.53
	8/29/2022	462.60	30.28	432.32	2.55	429.72
	9/26/2022	462.60	31.81	430.79	2.37	429.54
	10/26/2022	462.60	32.84	429.76	4.36	431.53
	11/14/2022	462.60	32.03	430.57	3.2	430.37
	12/28/2022	462.60	29.35	433.25	NA	NA
MW-02	1/24/2023	462.60	28.25	434.35	7.29	434.46
	2/29/2023	462.60	27.12	435.48	7.6	434.77
	3/28/2023	462.60	19.46	443.14	14.9	442.07
	4/25/2023	462.60	22.50	440.10	9.4	436.57
	5/15/2023	462.60	24.26	438.34	8.78	435.95
	6/26/2023	462.60	31.12	431.48	2.42	429.59
	7/25/2023	462.60	30.16	432.44	3.67	430.84
	8/26/2023	462.60	31.25	431.35	3.26	430.43
	9/27/2023	462.60	31.46	431.14	3.35	430.52
	10/17/2023	462.60	30.02	432.58	3.98	431.15
	11/6/2023	462.60	30.52	432.08	3.65	430.82
	12/21/2023	462.60	30.44	432.16	6.12	433.29
	1/24/2024	462.60	21.69	440.91	12.92	440.09
	2/19/2024	462.60	20.33	442.27	12.74	439.91
	3/26/2024	462.60	22.91	439.69	10.10	437.27
	4/12/2024	462.60	17.11	445.49	16.79	443.96
	5/17/2024	462.60	17.68	444.92	15.90	443.07
	6/17/2024	462.60	25.79	436.81	12.03	439.2
	7/25/2024	462.60	23.13	439.47	12.63	439.8
	8/21/2024	462.60	29.40	433.20	11.76	438.93
	9/9/2024	462.60	31.72	430.88	11.82	438.99
	10/29/2024	462.60	31.04	431.56	2.16	429.33
	11/18/2024	462.60	30.77	431.83	4.14	431.31
	12/10/2024	462.60	31.32	431.28	2.8	429.97

Table 5. Groundwater Elevations for CCR Permit Wells and Piezometers - Midwest Generation, LLC, Powertron Station, Pekin, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TDS)	Groundwater Elevation (ft above datum)	Illinois River Gage Reading <sup>1</sup> (ft above MSL)	Illinois River Gage Reading <sup>2</sup> (ft above MSL)
MW-03 down-gradient	6/20/2017	462.48	22.31	440.17	11.93	439.1
	8/23/2017	462.48	26.18	434.30	3.86	431.03
	11/7/2017	462.48	25.38	437.10	6.89	434.06
	5/17/2018	462.48	22.62	439.86	9.93	437.1
	8/7/2018	462.48	29.17	433.31	2.13	429.3
	10/30/2018	462.48	24.71	437.77	4.21	431.38
	3/25/2019	462.48	17.20	445.28	16.74	443.91
	4/29/2019	462.48	18.85	443.63	14.04	441.21
	8/26/2019	462.48	27.65	434.83	3.61	430.78
	2/24/2020	462.48	20.18	442.30	12.84	440.01
	4/27/2020	462.48	20.43	442.05	12.64	439.81
	12/7/2020	462.48	28.61	433.87	2.97	430.14
	2/22/2021	462.48	23.48	439.00	6.21	433.38
	4/7/2021	462.48	21.73	440.75	10.23	437.4
	5/10/2021	462.48	22.98	439.50	10.71	437.88
	6/2/2021	462.48	21.53	440.95	10.7	437.87
	6/26/2021	462.48	21.98	440.50	12.11	439.28
	7/19/2021	462.48	18.35	444.13	15.06	442.23
	8/25/2021	462.48	27.85	434.63	3.49	430.66
	9/30/2021	462.48	30.32	432.16	2.49	429.66
	10/7/2021	462.48	22.34	440.14	13.08	440.25
	11/9/2021	462.48	22.86	439.62	5.17	432.34
	12/3/2021	462.48	23.14	439.34	6.68	433.85
	1/6/2022	462.48	23.13	439.34	6.45	433.62
	2/7/2022	462.48	24.08	438.40	4.4	431.57
	3/1/2022	462.48	18.92	443.56	16.04	443.21
	4/22/2022	462.48	17.98	444.50	NA	NA
	5/24/2022	462.48	21.14	441.34	11.42	438.59
	6/6/2022	462.48	22.50	439.98	8.21	435.38
	7/25/2022	462.48	29.11	433.37	5.36	432.53
	8/29/2022	462.48	30.31	432.17	2.55	426.72
	9/26/2022	462.48	32.27	430.21	2.37	426.54
	10/19/2022	462.48	33.83	426.65	4.36	431.63
	11/14/2022	462.48	33.51	428.97	3.2	436.37
	12/29/2022	462.48	30.21	432.27	NA	NA
	1/24/2023	462.48	30.19	432.29	7.29	434.46
	2/9/2023	462.48	28.45	434.03	7.6	434.77
	3/26/2023	462.48	19.55	442.93	14.9	442.07
	4/25/2023	462.48	22.15	440.33	9.4	436.57
	5/15/2023	462.48	23.46	439.02	8.78	435.95
	6/26/2023	462.48	31.47	431.01	2.42	429.59
	7/25/2023	462.48	30.42	432.06	3.67	430.84
	8/28/2023	462.48	31.29	431.19	3.26	430.43
	9/27/2023	462.48	32.32	430.16	3.35	430.52
	10/7/2023	462.48	31.72	430.76	3.98	431.15
	11/10/2023	462.48	31.45	431.03	3.65	430.82
	12/11/2023	462.48	31.50	430.98	6.12	433.29
	1/24/2024	462.48	21.49	440.99	12.92	440.09
	2/19/2024	462.48	19.10	443.38	12.74	439.91
	3/26/2024	462.48	22.72	439.76	10.10	437.27
	4/12/2024	462.48	17.92	444.56	16.79	443.96
	5/15/2024	462.48	17.37	445.11	15.90	443.07
	6/17/2024	462.48	25.51	436.97	12.03	439.2
	7/25/2024	462.48	23.52	438.96	12.63	439.8
	8/21/2024	462.48	28.38	434.10	11.76	438.93
	9/9/2024	462.48	31.53	430.95	11.82	438.99
	10/4/2024	462.48	32.31	430.17	2.16	429.33
	11/18/2024	462.48	31.65	430.83	4.14	431.31
	12/10/2024	462.48	31.85	430.63	2.8	429.97
MW-04 down-gradient	6/20/2017	460.57	22.15	438.42	11.93	439.1
	8/26/2017	460.57	28.49	432.08	3.66	431.03
	11/7/2017	460.57	25.62	434.95	6.89	434.06
	5/17/2018	460.57	24.13	436.44	9.93	437.1
	8/7/2018	460.57	29.23	431.34	2.13	429.3
	10/30/2018	460.57	26.58	433.99	4.21	431.38
	2/25/2019	460.57	15.45	445.12	16.74	443.91
	4/29/2019	460.57	15.88	444.69	14.04	441.21
	8/26/2019	460.57	27.35	433.22	3.61	430.78
	2/24/2020	460.57	19.81	440.76	12.84	440.01
	4/27/2020	460.57	19.76	440.81	12.64	439.81
	12/7/2020	460.57	28.50	432.07	2.97	430.14
	2/22/2021	460.57	20.44	434.13	6.21	433.38
	4/7/2021	460.57	21.90	438.67	10.23	437.4
	5/10/2021	460.57	23.92	436.65	10.71	437.88
	6/2/2021	460.57	21.41	439.16	10.7	437.87
	6/25/2021	460.57	22.40	438.17	12.11	439.28
	7/19/2021	460.57	17.22	443.35	15.06	442.23
	8/23/2021	460.57	27.81	432.76	3.49	430.66
	9/30/2021	460.57	30.01	430.56	2.49	429.66
	10/7/2021	460.57	22.29	438.28	13.08	440.25
	11/9/2021	460.57	25.83	434.74	5.17	432.34
	12/30/2021	460.57	25.79	434.78	6.68	433.85
	1/6/2022	460.57	25.30	435.27	6.45	433.62
	2/7/2022	460.57	27.95	432.62	4.4	431.57
	3/1/2022	460.57	16.63	443.94	16.04	443.21
	4/22/2022	460.57	16.81	443.76	NA	NA
	5/24/2022	460.57	20.89	439.68	11.42	438.59
	6/6/2022	460.57	22.89	437.68	8.21	435.38
	7/25/2022	460.57	29.18	431.39	5.36	432.53
	8/29/2022	460.57	29.71	430.86	2.55	429.72
	9/26/2022	460.57	31.42	429.15	2.37	429.54
	10/26/2022	460.57	32.38	428.19	4.36	431.53
	11/14/2022	460.57	32.80	427.77	3.2	430.37
	12/28/2022	460.57	29.21	431.36	NA	NA
	1/24/2023	460.57	27.79	432.78	7.29	434.46
	2/20/2023	460.57	26.46	434.11	7.6	434.77
	3/28/2023	460.57	17.49	443.08	14.9	442.07
	4/25/2023	460.57	22.01	438.56	9.4	436.57
	5/13/2023	460.57	24.29	436.28	8.78	435.95
	6/26/2023	460.57	30.13	430.44	2.42	429.59
	7/25/2023	460.57	29.88	430.69	3.67	430.84
	8/26/2023	460.57	30.60	429.97	3.26	430.43
	9/27/2023	460.57	30.90	429.67	3.35	430.52
	10/7/2023	460.57	28.72	431.85	3.98	431.15
	11/6/2023	460.57	29.99	430.58	3.65	430.82
	12/3/2023	460.57	30.02	430.55	6.12	433.29
	1/24/2024	460.57	21.07	439.50	12.92	440.09
	2/19/2024	460.57	18.39	442.18	12.74	439.91
	3/26/2024	460.57	22.53	438.04	10.10	437.27
	4/12/2024	460.57	15.44	445.13	16.79	443.96
	5/13/2024	460.57	15.82	444.75	15.90	443.07
	6/17/2024	460.57	25.68	434.89	12.03	439.2
	7/25/2024	460.57	23.30	437.27	12.63	439.8
	8/21/2024	460.57	29.40	431.17	11.76	438.93
	9/6/2024	460.57	31.19	429.38	11.82	438.99
	10/2/2024	460.57	29.89	430.68	2.16	429.33
	11/8/2024	460.57	29.98	430.59	4.14	431.31
	12/10/2024	460.57	30.51	430.06	2.8	429.97

Table 5. Groundwater Elevations for CCR Permit Wells and Piezometers - Midwest Generation, LLC, Powertrain Station, Pekin, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TDS)	Groundwater Elevation (ft above MSL)	Illinois River Gage Reading <sup>a</sup> (ft above datum)	Illinois River Gage Reading <sup>b</sup> (ft above MSL)
	11/16/2015	458.58	26.39	432.19	4.38	431.55
	2/22/2016	458.66	21.12	437.54	7.97	435.14
	5/16/2016	458.66	16.58	442.08	14.53	441.7
	8/15/2016	458.66	23.59	438.07	7.11	434.28
	11/14/2016	458.66	22.72	438.94	6.35	433.52
	2/13/2017	458.66	19.13	439.53	NA	NA
	5/1/2017	458.66	13.09	445.57	17.09	444.26
	6/20/2017	458.66	19.43	439.15	11.93	439.1
	8/28/2017	458.66	25.38	431.20	3.86	431.03
	11/7/2017	458.66	22.91	435.67	6.89	434.06
	3/17/2018	458.66	21.54	437.04	9.93	<b>437.1</b>
	8/7/2018	458.66	26.17	432.41	2.13	429.3
	10/30/2018	458.66	23.97	434.61	4.21	431.38
	2/25/2019	458.66	13.21	445.45	16.74	443.91
	4/29/2019	458.66	15.40	443.26	14.04	441.21
	8/26/2019	458.66	24.35	434.31	3.61	430.78
	2/24/2020	458.66	17.25	441.41	12.84	440.01
	4/27/2020	458.66	17.41	441.25	12.64	439.81
	12/7/2020	458.66	25.65	433.01	2.97	430.14
	2/22/2021	458.66	23.82	434.84	6.21	433.38
	4/7/2021	458.66	19.40	439.26	10.23	437.4
	5/10/2021	458.66	21.38	437.28	10.71	<b>437.88</b>
	6/2/2021	458.66	18.99	439.67	10.7	437.87
	6/28/2021	458.66	22.20	436.46	12.11	<b>439.28</b>
	7/19/2021	458.66	14.98	443.68	15.06	442.23
	8/23/2021	458.66	24.85	433.81	3.49	430.66
	9/30/2021	458.66	26.98	431.68	2.49	429.66
	10/7/2021	458.66	20.00	438.66	13.08	<b>440.25</b>
	11/20/2021	458.66	23.13	438.53	5.17	432.34
	12/30/2021	458.66	23.20	435.46	6.68	433.85
	1/6/2022	458.66	22.80	435.86	6.45	433.62
	2/7/2022	458.66	25.22	433.44	4.4	431.57
MW-05 down-gradient	3/1/2022	458.66	14.52	444.14	16.04	443.21
	4/22/2022	458.66	14.59	444.07	NA	NA
	5/24/2022	458.66	18.32	440.34	11.42	438.59
	6/6/2022	458.66	17.06	441.60	8.21	435.38
	7/25/2022	458.66	26.02	432.64	5.36	432.53
	8/29/2022	458.66	26.70	431.96	2.55	429.72
	9/26/2022	458.66	28.10	430.56	2.37	429.54
	10/26/2022	458.66	28.96	429.70	4.36	<b>431.53</b>
	11/4/2022	458.66	28.44	430.22	3.2	<b>430.37</b>
	12/26/2022	458.66	26.04	432.62	NA	NA
	1/24/2023	458.66	24.93	433.73	7.29	<b>434.46</b>
	2/20/2023	458.66	23.72	434.94	7.6	434.77
	3/26/2023	458.66	16.49	442.17	14.9	442.07
	4/25/2023	458.66	19.50	439.16	9.4	436.57
	5/15/2023	458.66	21.71	436.95	8.78	435.95
	6/26/2023	458.66	27.11	431.55	2.42	429.59
	7/25/2023	458.66	26.76	431.90	3.67	430.84
	8/28/2023	458.66	27.46	431.20	3.26	430.43
	9/27/2023	458.66	27.73	430.93	3.35	430.52
	10/7/2023	458.66	26.00	432.66	3.98	431.15
	11/6/2023	458.66	26.98	431.68	3.65	430.82
	12/1/2023	458.66	26.91	431.75	6.12	<b>433.29</b>
	1/24/2024	458.66	18.87	439.79	12.92	440.09
	2/19/2024	458.66	15.88	442.78	12.74	439.91
	3/26/2024	458.66	19.99	438.67	10.10	437.27
	4/12/2024	458.66	13.35	445.31	16.79	443.96
	5/15/2024	458.66	13.73	444.93	15.90	443.07
	6/17/2024	458.66	22.64	436.02	12.03	439.2
	7/25/2024	458.66	20.59	438.07	12.63	439.8
	8/21/2024	458.66	26.17	432.49	11.76	438.93
	9/9/2024	458.66	27.95	430.71	11.82	438.99
	10/29/2024	458.66	27.05	431.61	2.16	429.33
	11/16/2024	458.66	26.98	431.68	4.14	431.31
	12/10/2024	458.66	27.51	431.15	2.8	429.97
MW-07 down-gradient	5/1/2015	463.23	24.40	438.83	11.61	438.78
	8/18/2015	463.23	27.13	436.10	4.62	431.79
	11/16/2015	463.23	30.43	432.80	4.38	431.55
	2/22/2016	463.27	25.68	437.59	7.97	435.14
	5/16/2016	463.27	20.96	442.31	14.53	441.7
	8/15/2016	463.27	27.63	435.64	7.11	434.28
	11/14/2016	463.27	26.98	436.29	6.35	433.52
	2/13/2017	463.27	23.46	439.81	NA	NA
	5/2/2017	463.27	17.78	445.49	17.09	444.26
	8/24/2017	463.27	29.15	434.12	3.86	431.03
	11/8/2017	463.27	27.10	436.17	6.89	434.06
	3/6/2018	463.27	13.96	449.31	20.43	447.6
	5/18/2018	463.27	25.87	437.40	9.93	437.1
	8/10/2018	463.27	30.12	433.15	2.13	429.3
	10/9/2018	463.27	28.37	434.90	4.21	431.38
	2/25/2019	463.27	17.88	445.39	16.74	443.91
	4/29/2019	463.27	19.98	443.29	14.04	441.21
	8/26/2019	463.27	28.54	434.73	3.61	430.78
	11/1/2019	463.27	18.14	445.13	15.92	443.09
	2/24/2020	463.27	21.64	441.63	12.84	440.01
	4/27/2020	463.27	21.90	441.37	12.64	439.81
	8/10/2020	463.27	27.15	436.12	3.49	430.66
	12/7/2020	463.27	29.84	433.43	2.97	430.14
	2/22/2021	463.27	28.09	435.18	6.21	433.38
	5/10/2021	463.27	25.54	437.73	10.71	437.88
	8/23/2021	463.27	26.92	434.35	3.49	430.66
	11/7/2021	463.27	27.40	435.87	5.17	432.34
	2/7/2022	463.27	29.37	433.90	4.40	431.57
	6/6/2022	463.27	24.65	438.62	8.21	435.38
	8/29/2022	463.27	30.79	432.48	2.55	429.72
	11/4/2022	463.27	32.16	431.11	3.20	430.37
	2/20/2023	463.27	27.81	435.46	7.60	434.77
	5/15/2023	463.27	25.94	437.33	8.78	435.95
	8/28/2023	463.27	31.22	432.05	3.26	430.43
	11/6/2023	463.27	30.90	432.37	3.65	430.82
	1/24/2024	463.27	23.13	440.14	12.92	440.09
	2/19/2024	463.27	20.57	442.70	12.74	439.91
	3/26/2024	463.27	24.27	439.00	10.10	437.27
	4/12/2024	463.27	17.99	445.28	16.79	443.96
	5/15/2024	463.27	18.31	444.96	15.9	443.07
	6/17/2024	463.27	26.64	436.63	12.03	439.2
	7/25/2024	463.27	24.59	436.68	12.63	439.8
	8/21/2024	463.27	30.00	433.27	11.76	438.93
	9/9/2024	463.27	31.78	431.49	11.82	438.99
	10/7/2024	463.27	31.16	432.11	2.16	429.33
	11/18/2024	463.27	30.92	432.35	4.14	431.31
	12/10/2024	463.27	31.48	431.79	2.8	429.97

Table 5. Groundwater Elevations for CCR Permit Wells and Piezometers - Midwest Generation, LLC, Powertron Station, Pekin, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TDS)	Groundwater Elevation (ft above MSL)	Illinois River Gage Reading <sup>a</sup> (ft above datum)	Illinois River Gage Reading <sup>b</sup> (ft above MSL)
MW-09 up-gradient	11/16/2015	469.14	26.07	443.07	4.38	431.55
	2/22/2016	469.14	22.83	446.31	7.97	435.14
	5/16/2016	469.14	23.06	446.08	14.53	441.7
	8/15/2016	469.14	24.50	444.64	7.11	434.28
	11/1/2017	469.14	24.33	444.81	6.35	433.52
	2/1/2017	469.14	23.43	445.71	NA	NA
	5/1/2017	469.14	20.77	448.37	17.09	444.26
	6/20/2017	469.14	22.15	446.99	11.93	439.1
	8/25/2017	469.14	24.79	444.35	3.86	431.03
	11/6/2017	469.14	25.74	443.40	6.89	434.06
	3/16/2018	469.14	23.89	445.25	9.93	437.1
	8/8/2018	469.14	25.49	443.65	2.13	429.3
	11/1/2018	469.14	26.02	443.12	4.21	431.38
	4/29/2019	469.14	21.30	447.84	14.04	441.21
	11/1/2019	469.14	21.31	447.83	15.92	443.09
	4/27/2020	469.14	21.80	447.34	12.64	439.81
	12/7/2020	469.14	26.19	442.95	2.97	430.14
	2/22/2021	469.14	26.08	443.06	6.21	433.38
	4/7/2021	469.14	23.75	445.39	10.23	437.4
	5/10/2021	469.14	24.55	444.59	10.71	437.88
	6/2/2021	469.14	23.31	445.83	10.7	437.87
	6/26/2021	469.14	24.18	444.96	12.11	439.28
	7/19/2021	469.14	22.20	446.94	15.06	442.23
	8/23/2021	469.14	24.75	444.39	3.49	430.66
	9/30/2021	469.14	26.28	442.86	2.49	429.66
	4/22/2022	469.14	21.75	447.39	NA	NA
	5/24/2022	469.14	22.40	446.74	11.42	438.59
	6/6/2022	469.14	22.95	446.19	8.21	435.38
	7/25/2022	469.14	25.51	443.63	5.36	432.53
	8/29/2022	469.14	26.56	442.58	2.55	429.72
	9/28/2022	469.14	27.52	441.62	2.37	429.54
	10/16/2022	469.14	28.38	440.76	4.36	431.53
	11/14/2022	469.14	28.44	440.70	3.2	430.37
	12/28/2022	469.14	27.96	441.18	NA	NA
	1/24/2023	469.14	27.93	441.21	7.29	434.46
	2/20/2023	469.14	27.62	441.52	7.6	434.77
	3/26/2023	469.14	24.05	445.09	14.9	442.07
	4/25/2023	469.14	23.76	445.38	9.4	436.57
	5/15/2023	469.14	24.90	444.24	8.78	435.95
	6/26/2023	469.14	27.40	441.74	2.42	429.59
	7/25/2023	469.14	27.55	441.59	3.67	430.84
	8/28/2023	469.14	26.00	441.14	3.26	430.43
	9/26/2023	469.14	26.64	440.50	3.35	430.52
	10/7/2023	469.14	28.85	440.29	3.98	431.15
	11/6/2023	469.14	28.98	440.16	3.65	430.82
	12/21/2023	469.14	29.12	440.02	6.12	433.29
	1/24/2024	469.14	26.76	442.38	12.92	440.09
	2/19/2024	469.14	23.94	445.20	12.74	439.91
	3/26/2024	469.14	24.98	444.16	10.10	437.27
	4/12/2024	469.14	23.78	445.36	16.79	443.96
	5/15/2024	469.14	22.17	446.97	15.9	443.07
	6/17/2024	469.14	23.87	445.27	12.03	439.2
	7/25/2024	469.14	24.81	444.33	12.63	439.8
	8/21/2024	469.14	26.00	443.14	11.76	438.93
	9/9/2024	469.14	27.13	442.01	11.82	438.99
	10/25/2024	469.14	26.55	440.59	2.16	429.33
	11/18/2024	469.14	28.36	440.78	4.14	431.31
	12/10/2024	469.14	28.73	440.41	2.8	429.97
MW-10 down-gradient	6/22/2017	457.31	13.46	443.85	NA	NA
	8/24/2017	457.31	16.39	440.92	3.79	430.96
	11/9/2017	457.31	16.86	440.45	6.7	433.87
	5/16/2018	457.31	14.88	442.43	9.67	436.84
	8/8/2018	457.31	17.88	439.43	2.13	429.3
	10/10/2018	457.31	17.04	440.27	4.21	431.38
	2/25/2019	457.31	11.28	446.03	16.74	443.91
	4/29/2019	457.31	11.88	445.43	14.04	441.21
	8/26/2019	457.31	15.89	441.42	3.61	430.78
	2/24/2020	457.31	12.64	444.67	12.84	440.01
	4/27/2020	457.31	12.75	444.56	12.64	439.81
	12/7/2020	457.31	17.80	439.51	2.97	430.14
	2/22/2021	457.31	17.25	440.06	6.21	433.38
	4/7/2021	457.31	14.21	443.10	10.23	437.4
	5/10/2021	457.31	15.58	441.73	10.71	437.88
	6/2/2021	457.31	13.98	443.33	10.7	437.87
	6/26/2021	457.31	15.28	442.03	12.11	439.28
	7/19/2021	457.31	12.30	445.01	15.06	442.23
	8/23/2021	457.31	16.61	440.70	3.49	430.66
	9/30/2021	457.31	18.67	438.64	2.49	429.66
	10/25/2021	457.31	16.23	441.08	10.56	437.73
	11/29/2021	457.31	15.52	441.79	5.17	432.34
	12/30/2021	457.31	16.50	440.81	6.68	433.85
	1/6/2022	457.31	16.82	440.49	6.45	433.62
	2/7/2022	457.31	17.70	439.61	4.4	431.57
	3/1/2022	457.31	13.77	443.54	16.04	443.21
	4/22/2022	457.31	11.80	445.51	NA	NA
	5/24/2022	457.31	13.20	444.11	11.42	438.59
	6/6/2022	457.31	14.07	443.24	8.21	435.38
	7/25/2022	457.31	17.53	439.78	5.36	432.53
	8/29/2022	457.31	19.08	438.23	2.55	429.72
	9/26/2022	457.31	20.16	437.15	2.37	429.54
	10/19/2022	457.31	21.23	436.08	4.36	431.53
	11/14/2022	457.31	21.06	436.25	3.2	430.37
	12/26/2022	457.31	18.71	438.60	NA	NA
	1/24/2023	457.31	19.50	437.81	7.29	434.46
	2/20/2023	457.31	18.05	438.66	7.6	434.77
	3/26/2023	457.31	13.66	443.65	14.9	442.07
	4/25/2023	457.31	14.14	443.17	9.4	436.57
	5/15/2023	457.31	15.90	441.41	8.78	435.95
	6/26/2023	457.31	20.10	437.21	2.42	429.59
	7/25/2023	457.31	19.69	437.62	3.67	430.84
	8/26/2023	457.31	20.38	436.93	3.26	430.43
	9/26/2023	457.31	20.93	436.38	3.35	430.52
	10/7/2023	457.31	20.67	436.64	3.98	431.15
	11/6/2023	457.31	20.81	436.50	3.65	430.82
	12/1/2023	457.31	20.80	436.51	6.12	433.29
	1/24/2024	457.31	16.73	440.58	12.92	440.09
	2/19/2024	457.31	13.05	444.26	12.74	439.91
	3/26/2024	457.31	15.33	441.98	10.10	437.27
	4/12/2024	457.31	12.93	444.38	16.79	443.96
	5/15/2024	457.31	11.78	445.53	15.90	443.07
	6/17/2024	457.31	15.18	442.13	12.03	439.2
	7/25/2024	457.31	15.78	441.53	12.63	439.8
	8/21/2024	457.31	18.15	439.16	11.76	438.93
	9/9/2024	457.31	18.15	436.35	2.16	429.33
	10/9/2024	457.31	20.96	436.67	4.14	431.31
	11/18/2024	457.31	20.64	436.30	2.8	429.97
	12/10/2024	457.31	21.01	436.30	2.8	429.97

Table 5. Groundwater Elevations for CCR Permit Wells and Piezometers - Midwest Generation, LLC, Powertron Station, Pekin, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TDS)	Groundwater Elevation (ft above datum)	Illinois River Gage Reading <sup>a</sup> (ft above datum)	Illinois River Gage Reading <sup>b</sup> (ft above MSL)
MW-11	11/16/2015	471.62	31.67	439.95	4.38	431.55
	2/22/2016	471.62	28.34	443.28	7.97	435.14
	5/16/2016	471.62	27.11	444.51	14.53	441.7
	8/15/2016	471.62	29.64	441.98	7.11	434.28
	11/1/2016	471.62	29.19	442.43	6.35	433.52
	2/13/2017	471.62	27.49	444.13	NA	NA
	5/1/2017	471.62	24.34	447.28	17.09	444.26
	6/20/2017	471.62	26.94	444.68	11.93	439.1
	8/29/2017	471.62	30.42	441.20	3.86	431.03
	11/19/2017	471.62	30.27	441.35	6.89	434.06
	5/16/2018	471.62	28.58	443.04	9.93	437.1
	8/9/2018	471.62	31.04	440.58	2.13	429.3
	11/1/2018	471.62	30.82	440.80	4.21	431.38
	4/29/2019	471.62	25.38	446.24	14.04	441.21
	11/1/2019	471.62	24.88	446.74	15.92	443.09
	4/27/2020	471.62	26.35	445.27	12.64	439.81
	12/7/2020	471.62	31.35	440.27	2.97	430.14
	2/22/2021	471.62	30.78	440.84	6.21	433.38
	4/7/2021	471.62	27.85	443.77	10.23	437.4
	5/10/2021	471.62	29.19	442.43	10.71	437.88
	6/2/2021	471.62	27.57	444.05	10.7	437.87
	6/28/2021	471.62	28.84	442.78	12.11	439.28
	7/19/2021	471.62	25.82	445.80	15.06	442.23
	8/23/2021	471.62	30.10	441.52	3.49	430.66
	9/30/2021	471.62	31.78	439.84	2.49	429.66
	10/25/2021	471.62	30.12	441.50	13.08	440.25
	11/20/2021	471.62	29.40	442.22	5.17	432.34
	12/9/2021	471.62	30.22	441.40	6.68	433.85
	1/6/2022	471.62	30.09	441.53	6.45	433.62
	2/7/2022	471.62	31.19	440.43	4.4	431.57
	3/1/2022	471.62	26.92	444.70	16.04	443.21
	4/22/2022	471.62	25.43	446.19	NA	NA
	5/24/2022	471.62	26.69	444.93	11.42	438.59
	6/6/2022	471.62	27.55	444.07	8.21	435.38
	7/25/2022	471.62	30.77	440.85	5.36	432.53
	8/29/2022	471.62	31.95	439.67	2.55	429.72
	9/28/2022	471.62	32.99	438.63	2.37	429.54
	10/16/2022	471.62	33.86	437.76	4.36	431.53
	11/14/2022	471.62	33.79	437.83	3.2	430.37
	12/28/2022	471.62	32.41	439.21	NA	NA
	1/24/2023	471.62	32.57	439.05	7.29	434.46
	2/29/2023	471.62	31.91	439.71	7.6	434.77
	3/26/2023	471.62	27.32	444.30	14.9	442.07
	4/25/2023	471.62	27.80	443.82	9.4	436.57
	5/15/2023	471.62	29.25	442.37	8.78	435.95
	6/26/2023	471.62	32.81	438.81	2.42	429.59
	7/25/2023	471.62	32.55	439.07	3.67	430.84
	8/26/2023	471.62	33.15	438.47	3.26	430.43
	9/26/2023	471.62	33.76	437.86	3.35	430.52
	10/27/2023	471.62	33.68	437.94	3.98	431.15
	11/6/2023	471.62	33.79	437.83	3.65	430.82
	12/21/2023	471.62	33.81	437.81	6.12	433.29
	1/24/2024	471.62	29.99	441.63	12.92	440.09
	2/19/2024	471.62	27.13	444.49	12.74	439.91
	3/26/2024	471.62	26.92	442.70	10.10	437.27
	4/12/2024	471.62	26.50	445.12	16.79	443.96
	5/15/2024	471.62	25.47	446.15	15.9	443.07
	6/17/2024	471.62	26.61	443.01	12.03	439.2
	7/25/2024	471.62	29.00	442.62	12.63	439.8
	8/21/2024	471.62	31.19	440.43	11.76	438.93
	9/9/2024	471.62	32.69	438.93	11.82	438.99
	10/25/2024	471.62	33.73	437.89	2.16	429.33
	11/18/2024	471.62	33.43	438.19	4.14	431.31
	12/10/2024	471.62	33.79	437.83	2.8	429.97
MW-19	11/14/2017	465.07	22.65	442.42	6.35	433.52
	2/13/2017	465.07	21.27	443.80	NA	NA
	5/1/2017	465.07	18.39	446.68	17.09	444.26
	6/20/2017	465.07	20.44	444.63	11.93	439.1
	8/28/2017	465.07	23.60	441.47	3.86	431.03
	11/19/2017	465.07	23.80	441.27	6.89	434.06
	3/14/2018	465.07	22.08	442.99	9.93	437.1
	8/6/2018	465.07	24.14	440.93	2.13	429.3
	10/29/2018	465.07	24.31	440.76	4.21	431.38
	4/29/2019	465.07	19.12	445.95	14.04	441.21
	11/11/2019	465.07	18.80	446.27	15.92	443.09
	4/27/2020	465.07	19.94	445.13	12.64	439.81
	12/21/2020	465.07	23.31	441.76	3.49	430.66
	5/24/2021	465.07	24.63	440.44	2.97	430.14
	6/22/2021	465.07	24.23	440.84	6.21	433.38
	4/7/2021	465.07	21.60	443.47	10.23	437.4
	5/10/2021	465.07	22.75	442.32	10.71	437.88
	6/2/2021	465.07	21.24	443.83	10.7	437.87
	6/28/2021	465.07	22.41	442.66	12.11	439.28
	7/19/2021	465.07	19.75	445.32	15.06	442.23
	8/23/2021	465.07	23.31	441.76	3.49	430.66
	9/30/2021	465.07	24.85	440.22	2.49	429.66
	10/27/2021	465.07	23.36	441.71	13.08	440.25
	11/29/2021	465.07	22.75	442.32	5.17	432.34
	12/9/2021	465.07	23.65	441.42	6.68	433.85
	1/6/2022	465.07	24.04	441.03	6.45	433.62
	2/7/2022	465.07	24.46	440.61	4.4	431.57
	3/1/2022	465.07	21.05	444.02	8.21	435.38
	4/22/2022	465.07	19.34	445.73	NA	NA
	5/24/2022	465.07	20.34	444.73	11.42	438.59
	6/6/2022	465.07	21.05	444.02	8.21	435.38
	7/25/2022	465.07	23.98	441.09	5.36	432.53
	8/28/2022	465.07	25.97	439.10	2.37	429.54
	10/26/2022	465.07	26.81	438.26	4.36	431.53
	11/14/2022	465.07	26.79	438.28	3.2	430.37
	12/28/2022	465.07	25.95	439.12	NA	NA
	1/24/2023	465.07	25.93	439.14	7.29	434.46
	2/20/2023	465.07	25.29	439.78	7.6	434.77
	3/26/2023	465.07	21.40	443.67	14.9	442.07
	4/25/2023	465.07	21.52	443.55	9.4	436.57
	5/15/2023	465.07	22.94	442.13	8.78	435.95
	6/26/2023	465.07	25.76	439.31	2.42	429.59
	7/25/2023	465.07	25.69	439.38	3.67	430.84
	8/28/2023	465.07	26.24	438.83	3.26	430.43
	9/28/2023	465.07	26.86	438.21	3.35	430.52
	10/27/2023	465.07	26.97	438.10	3.98	431.15
	11/6/2023	465.07	27.07	438.00	3.65	430.82
	12/1/2023	465.07	27.13	437.94	6.12	433.29
	1/24/2024	465.07	23.97	441.10	12.92	440.09
	2/19/2024	465.07	21.30	443.77	12.74	439.91
	3/26/2024	465.07	22.70	442.37	10.10	437.27
	4/12/2024	465.07	20.81	444.26	16.79	443.96
	5/13/2024	465.07	19.52	445.55	15.9	443.07
	6/17/2024	465.07	22.02	443.05	12.03	439.2
	7/25/2024	465.07	22.62	442.45	12.63	439.8
	8/21/2024	465.07	24.35	440.72	11.76	438.93
	9/9/2024	465.07	25.57	439.50	11.82	438.99
	10/25/2024	465.07	26.82	438.25	2.16	429.33
	11/18/2024	465.07	26.52	438.55	4.14	431.31
	12/10/2024	465.07	26.92	438.15	2.8	429.97

Table 5. Groundwater Elevations for CCR Permit Wells and Piezometers - Midwest Generation, LLC, Powerton Station, Pekin, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TDS)	Groundwater Elevation (ft above datum)	Illinois River Gage Reading <sup>a</sup> (ft above datum)	Illinois River Gage Reading <sup>b</sup> (ft above MSL)
MW-21D down-gradient	4/12/2024	469.93	24.76	445.17	16.79	443.96
	5/15/2024	469.93	24.08	445.85	15.9	443.07
	6/17/2024	469.93	29.56	440.37	12.03	439.2
	7/25/2024	469.93	28.95	440.98	12.63	439.8
	8/21/2024	469.93	32.47	437.46	11.76	438.93
	9/9/2024	469.93	33.80	436.13	11.82	438.99
	10/19/2024	469.93	34.34	435.59	2.16	429.33
	11/16/2024	469.93	33.84	436.09	4.14	431.31
	12/10/2024	469.93	34.23	435.70	2.8	429.97
	4/12/2024	469.03	19.83	445.20	16.79	443.96
MW-23 up-gradient	5/15/2024	469.03	18.60	446.43	15.9	443.07
	6/17/2024	469.03	21.23	443.80	12.03	439.2
	7/25/2024	469.03	21.83	443.20	12.63	439.8
	8/21/2024	469.03	23.66	441.37	11.76	438.93
	9/9/2024	469.03	25.05	439.98	11.82	438.99
	10/19/2024	469.03	26.24	438.79	2.16	429.33
	11/16/2024	469.03	25.96	439.07	4.14	431.31
	12/10/2024	469.03	23.36	441.07	2.8	429.97
	4/12/24	463.65	19.12	444.53	16.79	443.96
	5/15/2024	463.65	17.33	446.32	15.9	443.07
P-2 up-gradient	6/17/2024	463.65	18.23	445.42	12.03	439.2
	7/25/2024	463.65	19.73	443.92	12.63	439.8
	8/21/2024	463.65	20.17	443.48	11.76	438.93
	9/9/2024	463.65	20.75	442.90	11.82	438.99
	10/19/2024	463.65	21.68	441.97	2.16	429.33
	11/16/2024	463.65	21.63	442.02	4.14	431.31
	12/10/2024	463.65	21.70	441.95	2.8	429.97
	4/12/2024	460.08	13.62	446.46	16.79	443.96
	5/15/2024	460.08	13.08	447.00	15.9	443.07
	6/17/2024	460.08	13.46	446.62	12.03	439.2
P-1 down-gradient	7/25/2024	460.08	13.22	446.86	12.63	439.8
	8/21/2024	460.08	13.17	446.91	11.76	438.93
	9/9/2024	460.08	15.32	444.76	11.82	438.99
	10/19/2024	460.08	13.44	446.64	2.16	429.33
	11/16/2024	460.08	13.42	446.66	4.14	431.31
	12/10/2024	460.08	13.98	446.10	2.8	429.97

Notes: Elevations are in feet above mean sea level and depths are in feet below top of casing.

<sup>a</sup> Data obtained from USGS Kingston Mine Gage

MSL - Mean Sea Level

TDS - Total Depth

**BOLD** - River elevation above groundwater elevation

Dry - Less than 6" of water in well

NA - Data not available.

Table 6. Groundwater Flow Direction and Estimated Seepage Velocity/Flow Rate - Powerton Generation Station CCR Permit

DATE	Screened Unit	Groundwater Flow Direction	Kavg (ft/sec)*	Average Hydraulic Gradient (ft/ft)	Porosity (unitless)**	Estimated Seepage Velocity (ft/day)
1/24/2024	Silt/clay	Westerly	3.280E-07	0.0242	0.4	0.0017
1/24/2024	Sandy	Northeasterly - Northwesterly	1.390E-03	0.0009	0.35	0.30
2/19/2024	Silt/clay	Westerly	3.280E-07	0.0206	0.4	0.0015
2/19/2024	Sandy	Northeasterly - Northwesterly	1.390E-03	0.0016	0.35	0.55
3/26/2024	Silt/clay	Westerly	3.280E-07	0.0215	0.4	0.0015
3/26/2024	Sandy	Northeasterly - Northwesterly	1.390E-03	0.0021	0.35	0.72
4/12/2024	Silt/clay	Westerly	3.280E-07	0.0242	0.4	0.0017
4/12/2024	Silt/clay	Easterly	3.280E-07	0.0461	0.4	0.0033
4/12/2024	Sandy	Northeasterly - Northwesterly	1.390E-03	0.0011	0.35	0.38
5/15/2024	Silt/clay	Westerly	3.280E-07	0.0242	0.4	0.0017
5/15/2024	Silt/clay	Easterly	3.280E-07	0.0195	0.4	0.0014
5/15/2024	Sandy	Northeasterly - Northwesterly	1.390E-03	0.0010	0.35	0.36
6/17/2024	Silt/clay	Westerly	3.280E-07	0.0371	0.4	0.0026
6/17/2024	Silt/clay	Easterly	3.280E-07	0.0623	0.4	0.0044
6/17/2024	Sandy	Northeasterly - Northwesterly	1.390E-03	0.0036	0.35	1.23
7/25/2024	Silt/clay	Westerly	3.280E-07	0.0403	0.4	0.0029
7/25/2024	Silt/clay	Easterly	3.280E-07	0.0348	0.4	0.0025
7/25/2024	Sandy	Northeasterly - Northwesterly	1.390E-03	0.0026	0.35	0.89
8/21/2024	Silt/clay	Westerly	3.280E-07	0.0436	0.4	0.0031
8/21/2024	Silt/clay	Easterly	3.280E-07	0.0671	0.4	0.0048
8/21/2024	Sandy	Northeasterly - Northwesterly	1.390E-03	0.0040	0.35	1.37
9/9/2024	Silt/clay	Westerly	3.280E-07	0.0496	0.4	0.0035
9/9/2024	Silt/clay	Easterly	3.280E-07	0.0598	0.4	0.0042
9/9/2024	Sandy	Northeasterly - Northwesterly	1.390E-03	0.0049	0.35	1.67
10/29/2024	Silt/clay	Westerly	3.280E-07	0.0379	0.4	0.0027
10/29/2024	Silt/clay	Easterly	3.280E-07	0.0655	0.4	0.0046
10/29/2024	Sandy	Northeasterly - Northwesterly	1.390E-03	0.0039	0.35	1.36
11/18/2024	Silt/clay	Westerly	3.280E-07	0.0358	0.4	0.0025
11/18/2024	Silt/clay	Easterly	3.280E-07	0.0658	0.4	0.0047
11/18/2024	Sandy	Northeasterly - Northwesterly	1.390E-03	0.0039	0.35	1.36
12/10/2024	Silt/clay	Westerly	3.280E-07	0.0345	0.4	0.0024
12/10/2024	Silt/clay	Easterly	3.280E-07	0.0632	0.4	0.0045
12/10/2024	Sandy	Northeasterly - Northwesterly	1.390E-03	0.0051	0.35	1.75

\* Kavg - K values from re-evaluation of slug test data as part of groundwater modeling in support of Application for Construction Permit per Illinois State CCR Rule.

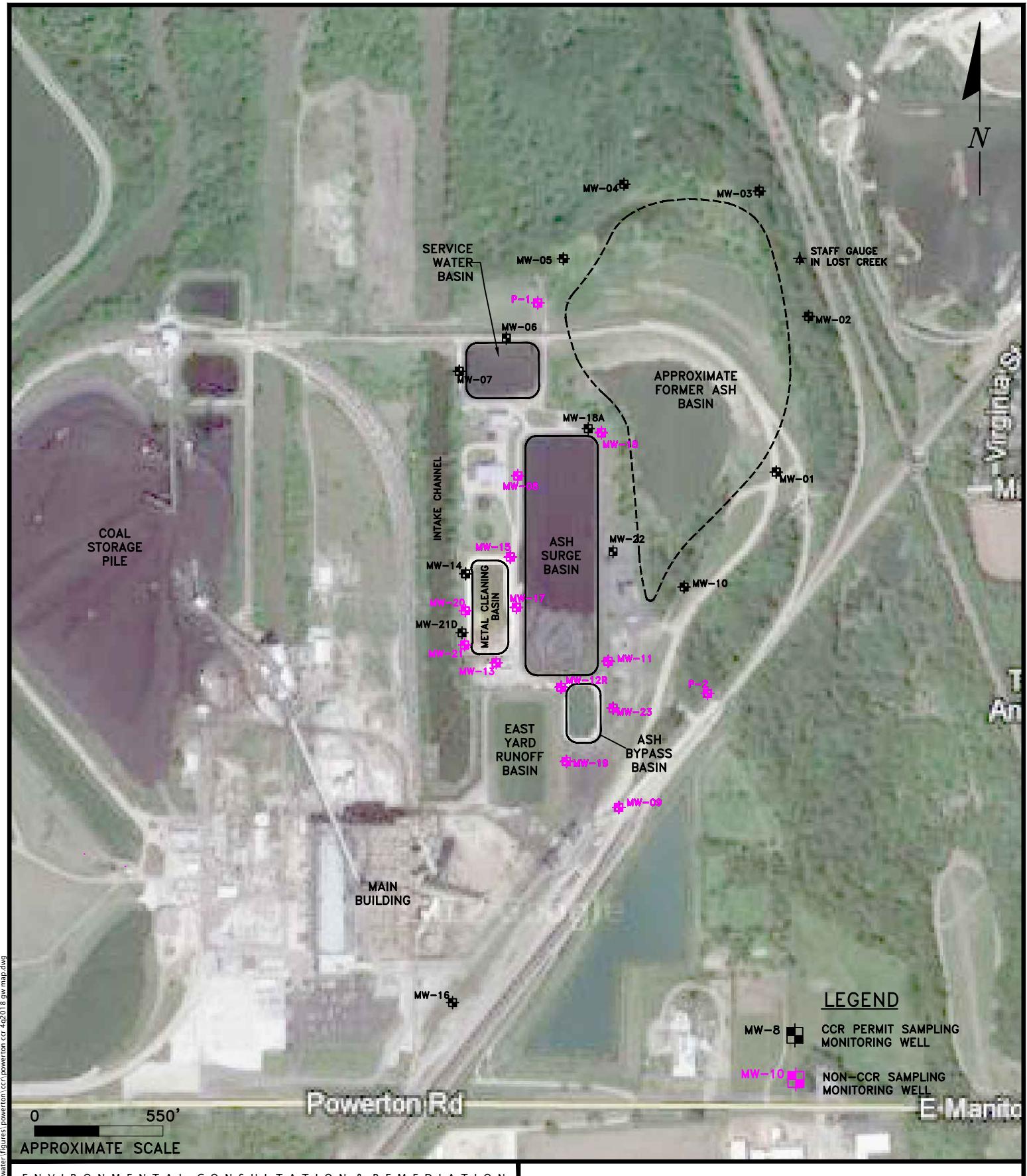
Average hydraulic conductivity for silt/clay unit (feet/second) from Groundwater, Freeze and Cherry, 1979.

\*\* - Porosity estimates from Applied Hydrogeology, Fetter, 1980.

Table 7. CCR Groundwater Sample Collection Summary for 2024 - Powerton Generating Station CCR Permit

<b>Well ID</b>	<b>Number of Groundwater Sampling Events</b>	<b>Dates of Groundwater Sampling Events</b>	<b>Detection Monitoring (D) versus Assessment Monitoring (A)</b>
MW-01 (Downgradient)	2	9/11/2024	D
		11/21/2024	D
MW-02 (Downgradient)	2	9/11/2024	D
		11/21/2024	D
MW-03 (Downgradient)	2	9/10/2024	D
		11/19/2024	D
MW-04 (Downgradient)	2	9/10/2024	D
		11/19/2024	D
MW-05 (Downgradient)	2	9/10/2024	D
		11/19/2024	D
MW-06 (Downgradient)	2	9/10/2024	D
		11/19/2024	D
MW-07 (Downgradient)	2	9/11/2024	D
		11/21/2024	D
MW-10 (Downgradient)	2	9/11/2024	D
		11/21/2024	D
MW-14 (Downgradient)	2	9/10/2024	D
		11/19/2024	D
MW-16 (Upgradient)	2	9/10/2024	D
		11/19/2024	D
MW-18A (Downgradient)	2	9/10/2024	D
		11/19/2024	D
MW-06 (Downgradient)	2	9/10/2024	D
		11/19/2024	D
MW-21D (Downgradient)	2	9/10/2024	D
		11/19/2024	D
MW-22 (Downgradient)	2	9/10/2024	D
		11/19/2024	D

## **FIGURES**



**K P R G**

KPRG and Associates, Inc.

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0475

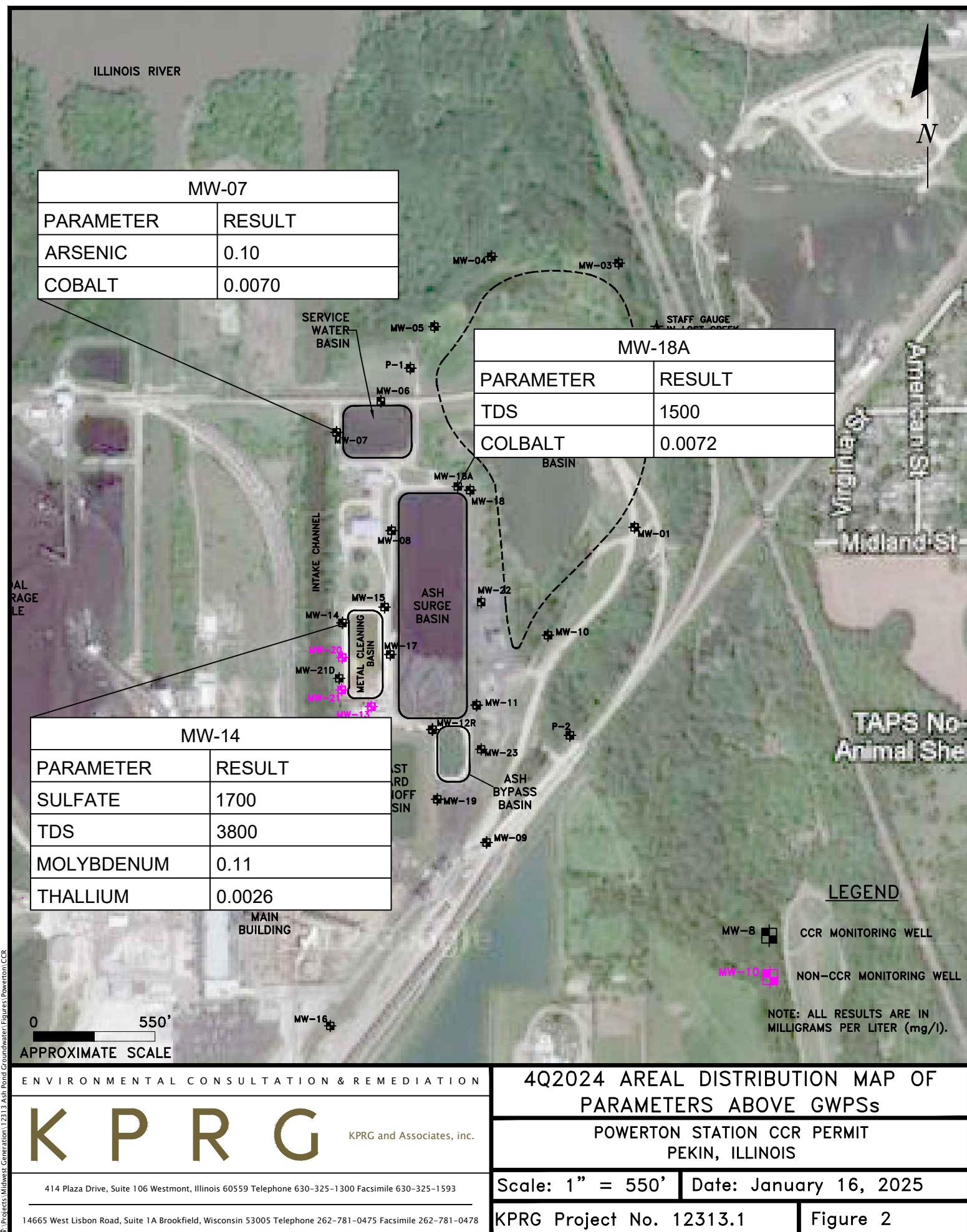
## CCR PERMIT MONITORING WELL SITE MAP

POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: January 14, 2025

KPRG Project No. 12313.1

FIGURE 1



**ATTACHMENT 1**

**New Well/Piezometer Installation Boring Logs and Well  
Construction Summaries**

# K P R G

ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

## GEOLOGIC LOG OF MW-21D

(Page 1 of 1)

Midwest Generation, LLC  
Powerton Station  
Pekin, IL

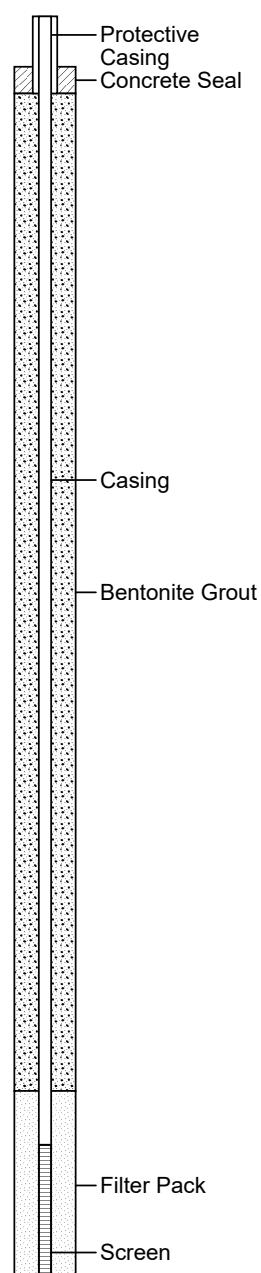
Project # 12313.1

Date Started : 04/12/24  
Date Completed : 04/12/24  
Drilling Method : 8 1/4 HSA  
Drill Rig : Geoprobe  
Driller Name/Co. : Nick / Cabeno Env. Serv.

Boring Depth : 45.0 ft. below surf. Elev.  
Well Bottom Depth : 45.0 ft. below surf. Elev.  
Surface Elevation : 466.79 ft. above MSL  
Top of Casing Elev. : 469.93 ft. above MSL  
Groundwater Elev. : 445.17 ft. above MSL  
Riser Material : 2 " Sch 40 PVC  
Screen Material : 2 " Sch 40 PVC, 0.01 slot  
Coordinate N : 1412219.230  
Coordinate E : 2432352.116  
Logged By : J. Misner

Depth in Feet	Surf. Elev. 466.79	DESCRIPTION	Recovery (in.)
0	466	Blind drilling to 35 feet.  See Boring Log MW-21 for reference.	
5	461		
10	456		
15	451		
20	446		
25	441		
30	436		
35	431	Logged off cuttings from 35-45 feet. Brown SILTY SAND, some gravel.	
40	426		
45	421	End of Boring at 45 feet	
50			

Well: MW-21D  
Elev.: 469.93



## GEOLOGIC LOG OF MW-22

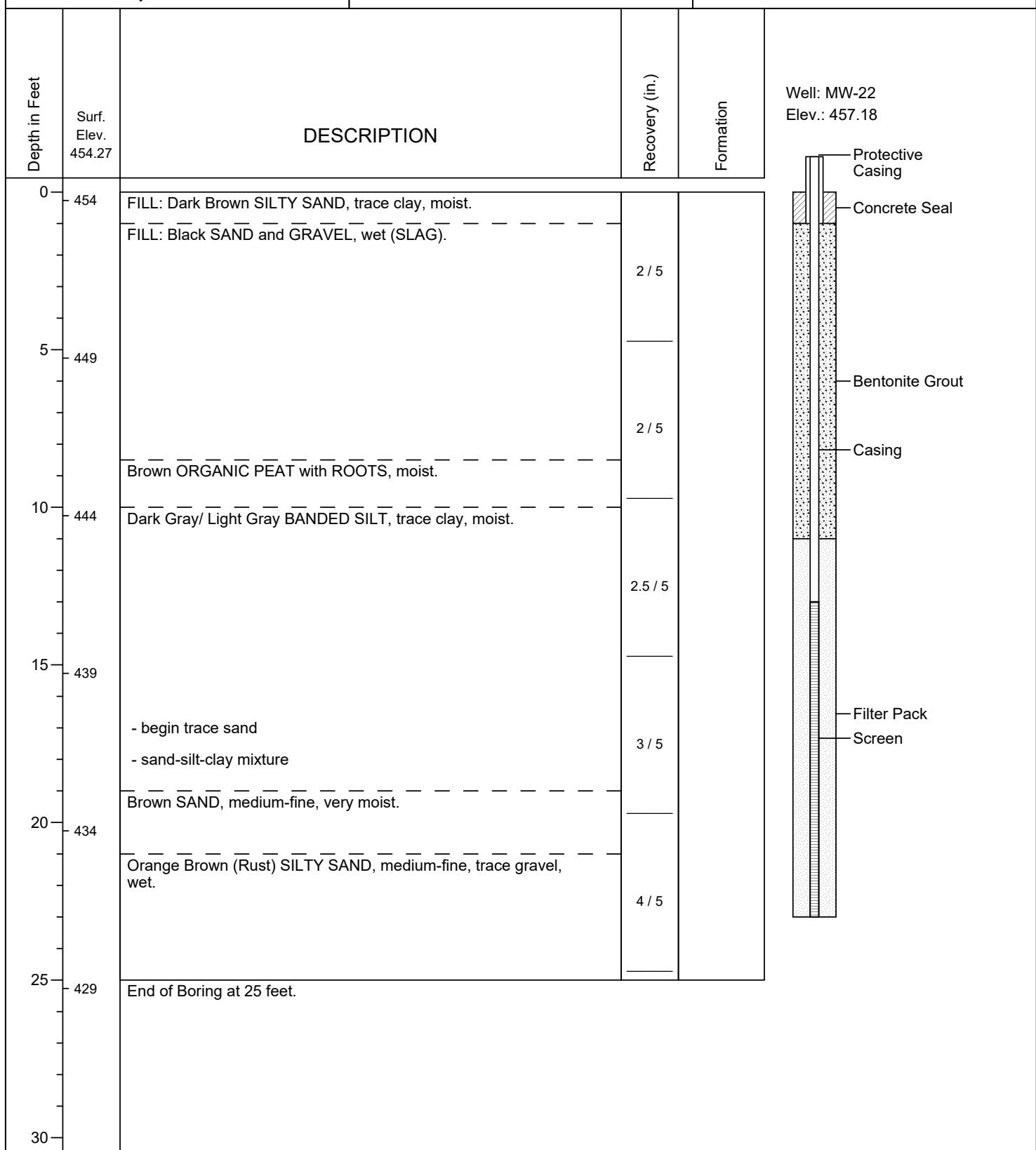
(Page 1 of 1)

Midwest Generation, LLC  
Powerton Station  
Pekin, IL

Project # 12313.5

Date Started : 04/10/24  
Date Completed : 04/10/24  
Drilling Method : 8 1/4 HSA  
Drill Rig : Geoprobe  
Driller Name/Co. : Nick / Cabeno Env. Serv.

Boring Depth : 25.0 ft. below surf. Elev.  
Well Bottom Depth : 23.0 ft. below surf. Elev.  
Surface Elevation : 454.27 ft. above MSL  
Top of Casing Elev. : 457.18 ft. above MSL  
Groundwater Elev. : 444.45 ft. above MSL  
Riser Material : 2 " Sch 40 PVC  
Screen Material : 2 " Sch 40 PVC, 0.01 slot  
Coordinate N : 1412616.452  
Coordinate E : 2433012.148  
Logged By : J. Misner



# K P R G

ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

## GEOLOGIC LOG OF MW-23

(Page 1 of 2)

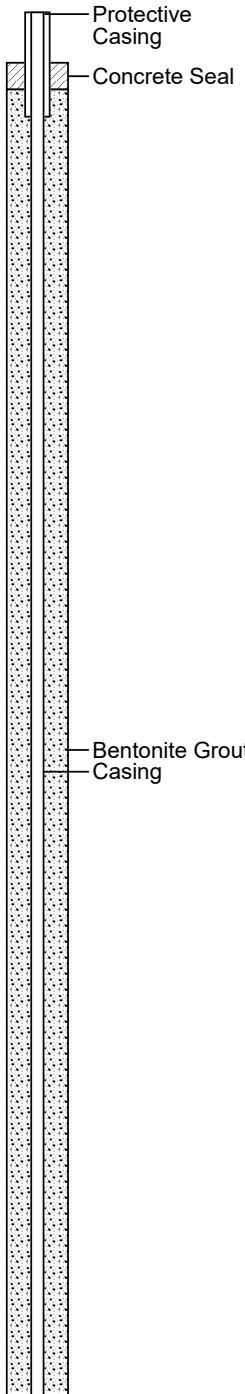
Midwest Generation, LLC  
Powerton Station  
Pekin, IL

Project # 12313.5

Date Started : 04/10/24  
Date Completed : 04/10/24  
Drilling Method : 8 1/4 HSA  
Drill Rig : Geoprobe  
Driller Name/Co. : Nick / Cabeno Env. Serv.

Boring Depth : 43.0 ft. below surf. Elev.  
Well Bottom Depth : 43.0 ft. below surf. Elev.  
Surface Elevation : 462.13 ft. above MSL  
Top of Casing Elev. : 465.03 ft. above MSL  
Groundwater Elev. : 445.20 ft. above MSL  
Riser Material : 2 " Sch 40 PVC  
Screen Material : 2 " Sch 40 PVC, 0.01 slot  
Coordinate N : 1411947.955  
Coordinate E : 2432993.953  
Logged By : J. Misner

Depth in Feet	Surf. Elev. 462.13	DESCRIPTION	Recovery (in.)	Formation	
0	462	FILL: Brown CLAY and TOP SOIL, moist.	2 / 5		Well: MW-23 Elev.: 465.03
5	457	- dark gray, claye sand and gravel, approximately 3" seam			
		FILL: Dark Gray SILTY SAND, trace clay, very moist.	2.5 / 5		
10	452	FILL: Black GRAVEL, trace medium-coarse sand, trace silt, very moist. (SLAG)	4 / 5		
15	447		4 / 5		
20	442		4 / 5		
25		- dark gray silty clay lense			



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## GEOLOGIC LOG OF MW-23

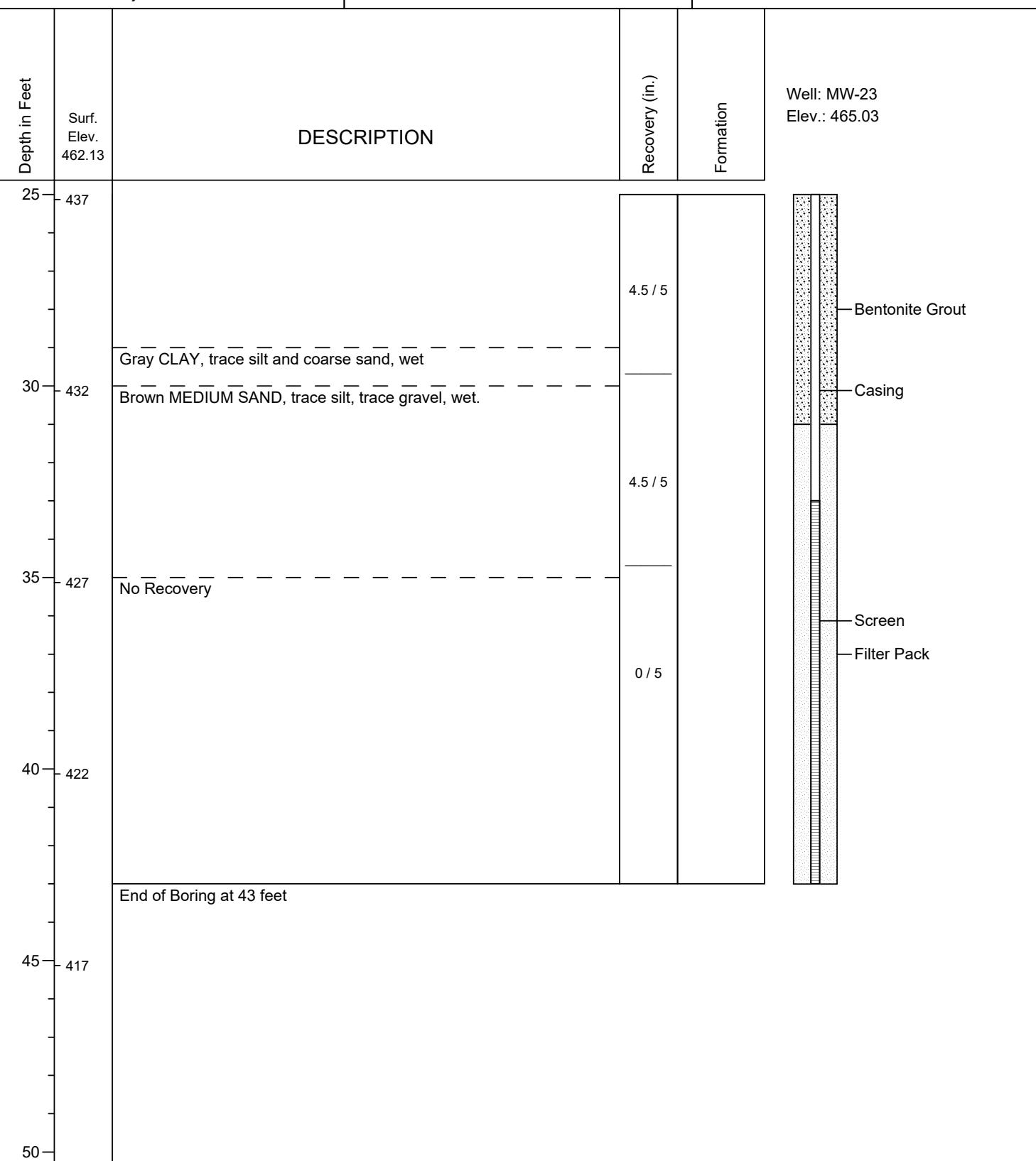
(Page 2 of 2)

Midwest Generation, LLC  
Powerton Station  
Pekin, IL

Project # 12313.5

Date Started : 04/10/24  
Date Completed : 04/10/24  
Drilling Method : 8 1/4 HSA  
Drill Rig : Geoprobe  
Driller Name/Co. : Nick / Cabeno Env. Serv.

Boring Depth : 43.0 ft. below surf. Elev.  
Well Bottom Depth : 43.0 ft. below surf. Elev.  
Surface Elevation : 462.13 ft. above MSL  
Top of Casing Elev. : 465.03 ft. above MSL  
Groundwater Elev. : 445.20 ft. above MSL  
Riser Material : 2 " Sch 40 PVC  
Screen Material : 2 " Sch 40 PVC, 0.01 slot  
Coordinate N : 1411947.955  
Coordinate E : 2432993.953  
Logged By : J. Misner



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KPRG and Associates, Inc.

## GEOLOGIC LOG OF P-1

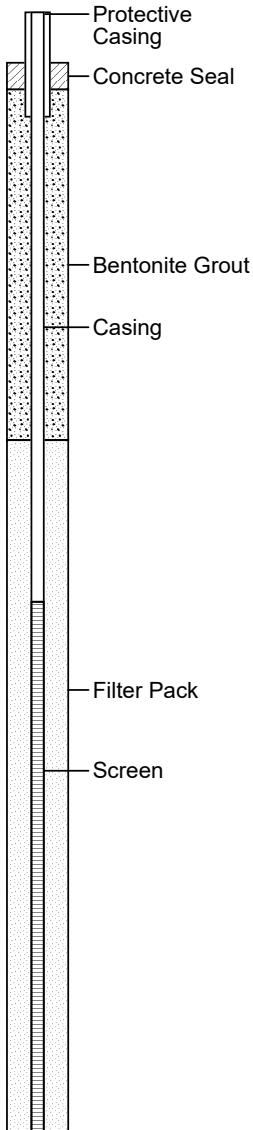
(Page 1 of 1)

Midwest Generation, LLC  
Powerton Station  
Pekin, IL

Project # 12313.1

Date Started : 04/11/24  
Date Completed : 04/11/24  
Drilling Method : 8 1/4 HSA  
Drill Rig : Geoprobe  
Driller Name/Co. : Nick / Cabeno Env. Serv.

Boring Depth : 20.0 ft. below surf. Elev.  
Well Bottom Depth : 20.0  
Surface Elevation : 457.13 ft. above MSL  
Top of Casing Elev. : 460.08 ft. above MSL  
Groundwater Elev. : 446.46 ft. above MSL  
Riser Material : 1 " Sch 40 PVC  
Screen Material : 1 " Sch 40 PVC, 0.01 slot  
Coordinate N : 1413681.386  
Coordinate E : 2432692.297  
Logged By : J. Misner

Depth in Feet	Surf. Elev. 457.13	DESCRIPTION	Recovery (in.)	Formation	
0	457	FILL: Brown and Gray COARSE SAND, trace gravel, dry.  FILL: Dark Brown MEDIUM SAND, trace silt, dry.	2 / 5		
5	452		2.5 / 5		
10	447	FILL: Dark Gray and Black SILT, trace banded silts and clay, trace organics with peat, moist.  FILL: Dark Brown and Black fine-medium GRAVEL trace silt, wet. (SLAG)	2 / 5		
15	442		2 / 5		
20	437	Banded Black and Dark Gray SILTY CLAY, verly moist, high plasticity.  End of Boring at 20 feet.	2 / 5		
25					

## GEOLOGIC LOG OF P-2

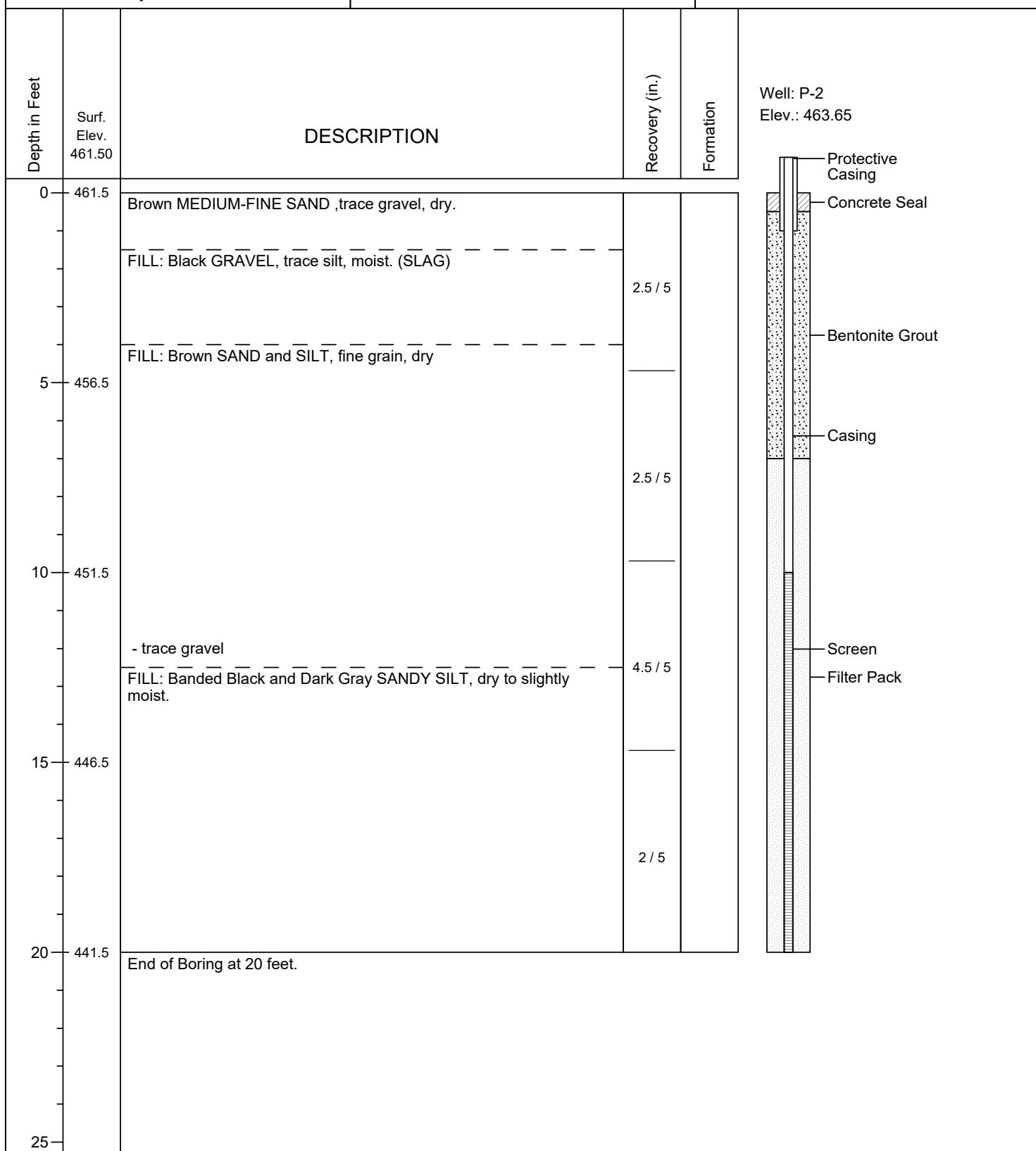
(Page 1 of 1)

Midwest Generation, LLC  
Powerton Station  
Pekin, IL

Project # 12313.1

Date Started : 04/11/24  
Date Completed : 04/11/24  
Drilling Method : 8 1/4 HSA  
Drill Rig : Geoprobe  
Driller Name/Co. : Nick / Cabeno Env. Serv.

Boring Depth : 20.0  
Well Bottom Depth : 20.0  
Surface Elevation : 461.50 ft. above MSL  
Top of Casing Elev. : 463.65 ft. above MSL  
Groundwater Elev. :  
Riser Material : 1 " Sch 40 PVC  
Screen Material : 1 " Sch 40 PVC, 0.01 slot  
Coordinate N : 1412039.533  
Coordinate E : 2433180.889  
Logged By : J. Misner



## GEOLOGIC LOG OF MW-18A

(Page 1 of 2)

Midwest Generation, LLC  
Powerton Station  
Pekin, Illinois

Project No. 17424.1

Date : August 19, 2024

Drilling Tools : Geoprobe

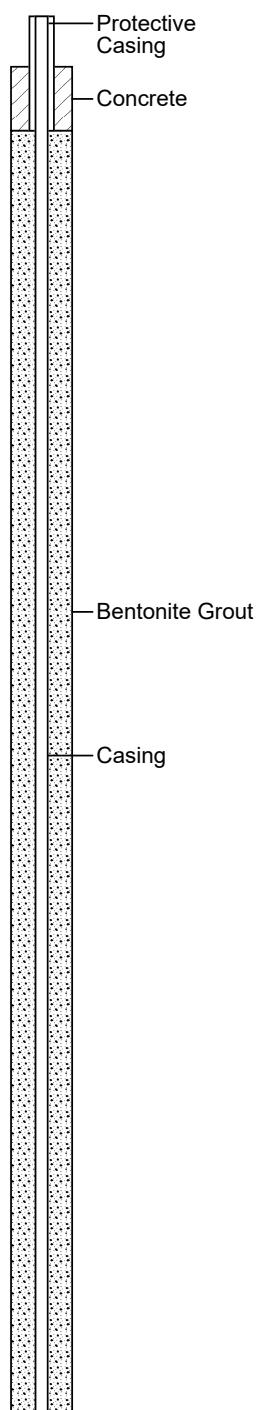
Drill Rig : Geoprobe

Driller Name/Co : Nick / Cabeno Env. Serv.

Boring Depth : 35.0 ft. below surf. Elev.  
 Well Bottom Depth : 35.0 ft. below surf. Elev.  
 Surface Elevation : 466.45 feet above MSL  
 Top of Casing Elev. : 469.54 feet above MSL  
 Groundwater Elev. : 433.94 feet above MSL  
 Riser Material : 2" Sch 40 PVC  
 Screen Material : 2" Sch 40 PVC, 0.010 slot  
 Coordinate N : 1413185.170  
 Coordinate E : 2432952.550  
 Logged By : J. Misner

Depth in Feet	Appx. Elev. 466.45	DESCRIPTION	Recovery (ft)	Formation
0	466	FILL: Brown SAND, trace silt, trace organics, dry		
2	464	- brown clay lense (6")		
4	462	- trace black gravel		
6	460	FILL: Black and Brown GRAVEL, trace sand, dry		
8	458	- brown clay lense (6")		
10	456	- increase moisture		
12	454			
14	452	FILL: Black GRAVEL, trace silt and clay, slightly moist		
16	450			
18	448	- organics (wood)		
18	448	FILL: Black GRAVEL, slightly moist		
20		- trace clay		

Well: MW-18A  
Elev.: 469.54



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## GEOLOGIC LOG OF MW-18A

(Page 2 of 2)

Midwest Generation, LLC  
Powerton Station  
Pekin, Illinois

Project No. 17424.1

Date : August 19, 2024

Drilling Tools : Geoprobe

Drill Rig : Geoprobe

Driller Name/Co : Nick / Cabeno Env. Serv.

Boring Depth : 35.0 ft. below surf. Elev.  
Well Bottom Depth : 35.0 ft. below surf. Elev.  
Surface Elevation : 466.45 feet above MSL  
Top of Casing Elev. : 469.54 feet above MSL  
Groundwater Elev. : 433.94 feet above MSL  
Riser Material : 2" Sch 40 PVC  
Screen Material : 2" Sch 40 PVC, 0.010 slot  
Coordinate N : 1413185.170  
Coordinate E : 2432952.550  
Logged By : J. Misner

Depth in Feet	Appx. Elev. 466.45	DESCRIPTION	Recovery (ft)	Formation
21	- 445			
23	- 443	- wet	2 / 5	Bentonite Grout
25	- 441			Casing
27	- 439			
29	- 437	Gray SILT with CLAY, trace organics, stiff, very moist/wet	3.5 / 5	
31	- 435			
33	- 433	- organics (wood)	3.5 / 5	Filter Sand
35	- 431	End of Boring at 35 feet.		Screen
37	- 429			
39	- 427			
41				

**ATTACHMENT 2**  
**Survey Data**



**MIDWEST GENERATION, LLC**  
**POWERTON STATION - PEKIN, IL**  
**MONITORING WELL, STAFF GUAGE AND PIEZOMETER SURVEY**

WELL#	NORTHING	EASTING	LID	T/CASE	T/WELL	CONC/GRND
MW-12R	1412086.381	2432792.024	473.18	473.17	472.95	470.08
MW-18A	1413185.170	2432952.550	469.55	469.54	469.54	466.45
MW-21D	1412219.230	2432352.116	470.09	470.08	469.93	466.79
MW-22	1412616.452	2433012.148	457.42	457.41	457.18	454.27
MW-23	1411947.955	2432993.953	465.23	465.22	465.03	462.13
PIEZ-1	1413681.386	2432692.297	460.13	460.12	460.08	457.13
PIEZ-2	1412039.533	2433180.889	463.75	463.74	463.65	461.50

ELEVATION AT STAFF GAUGE MARK 0.00' = 440.57

Horizontal: Illinois State Plane Coordinate System West Zone (NAD 83-2011)

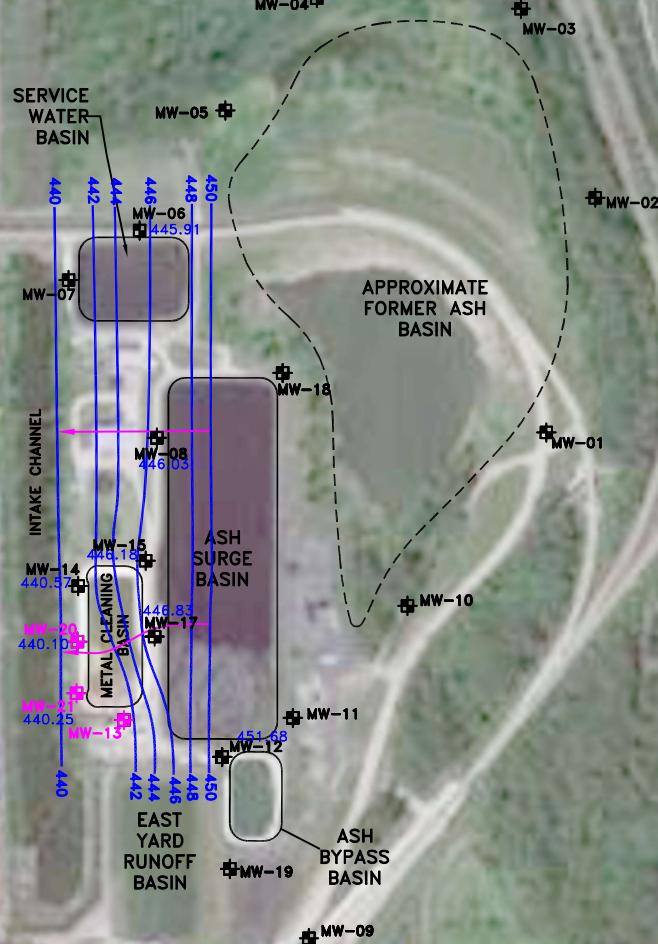
Vertical Datum: Plant Datum (subtract 1.04' to obtain NAVD 88)

**ATTACHMENT 3**  
**Monthly Potentiometric Maps**

ILLINOIS RIVER



COAL  
STORAGE  
PILE



#### LEGEND

- CCR MONITORING WELL
- NON-CCR MONITORING WELL
- GROUNDWATER CONTOUR
- GROUNDWATER FLOW LINE

0 550'

APPROXIMATE SCALE

ENVIRONMENTAL CONSULTATION & REMEDIATION

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KPRG and Associates, inc.

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

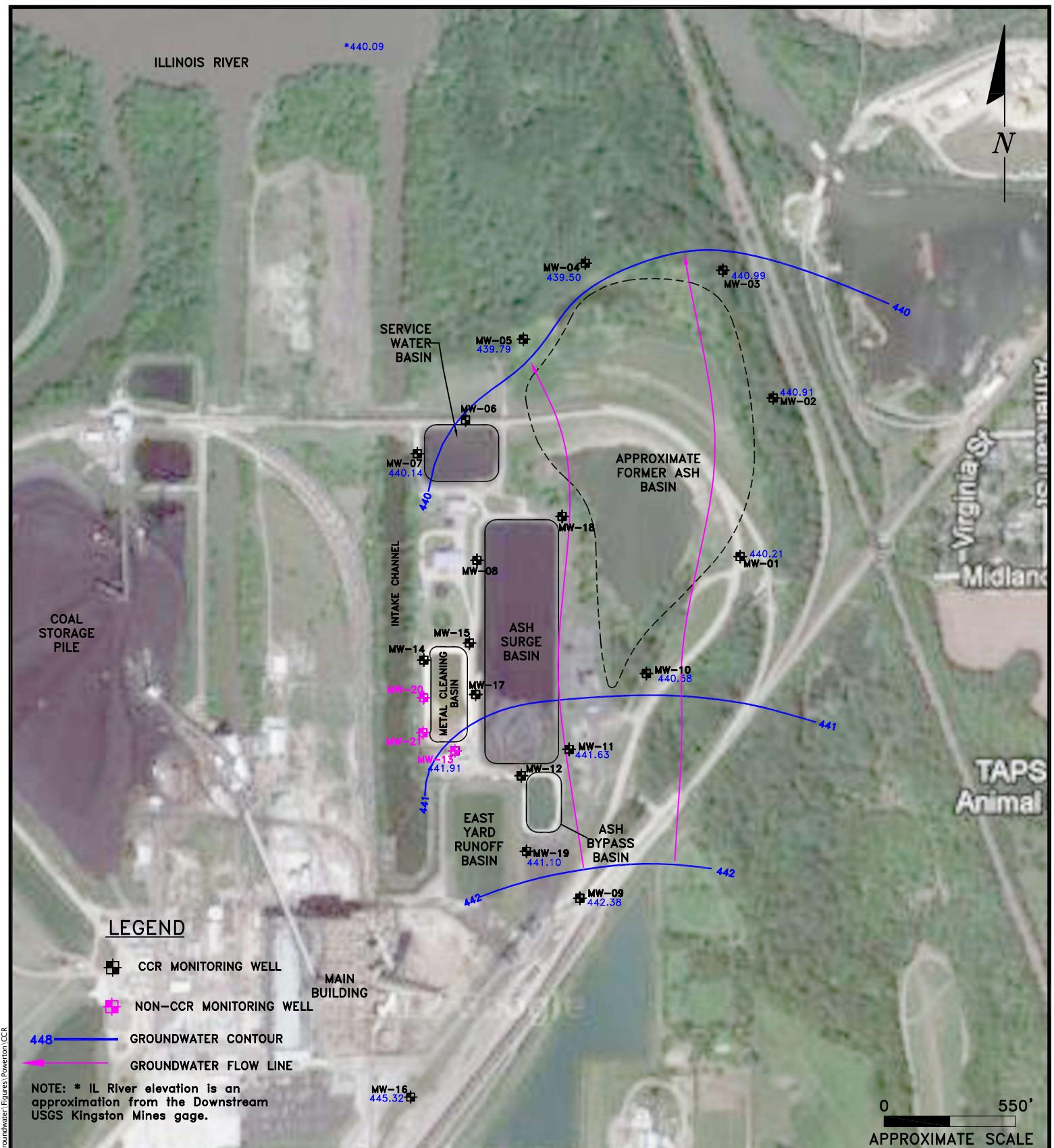
#### POTENTIOMETRIC MAP SILT/CLAY UNIT 01/2024

POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: December 20, 2024

KPRG Project No. 12313.1

ATTACHMENT 1



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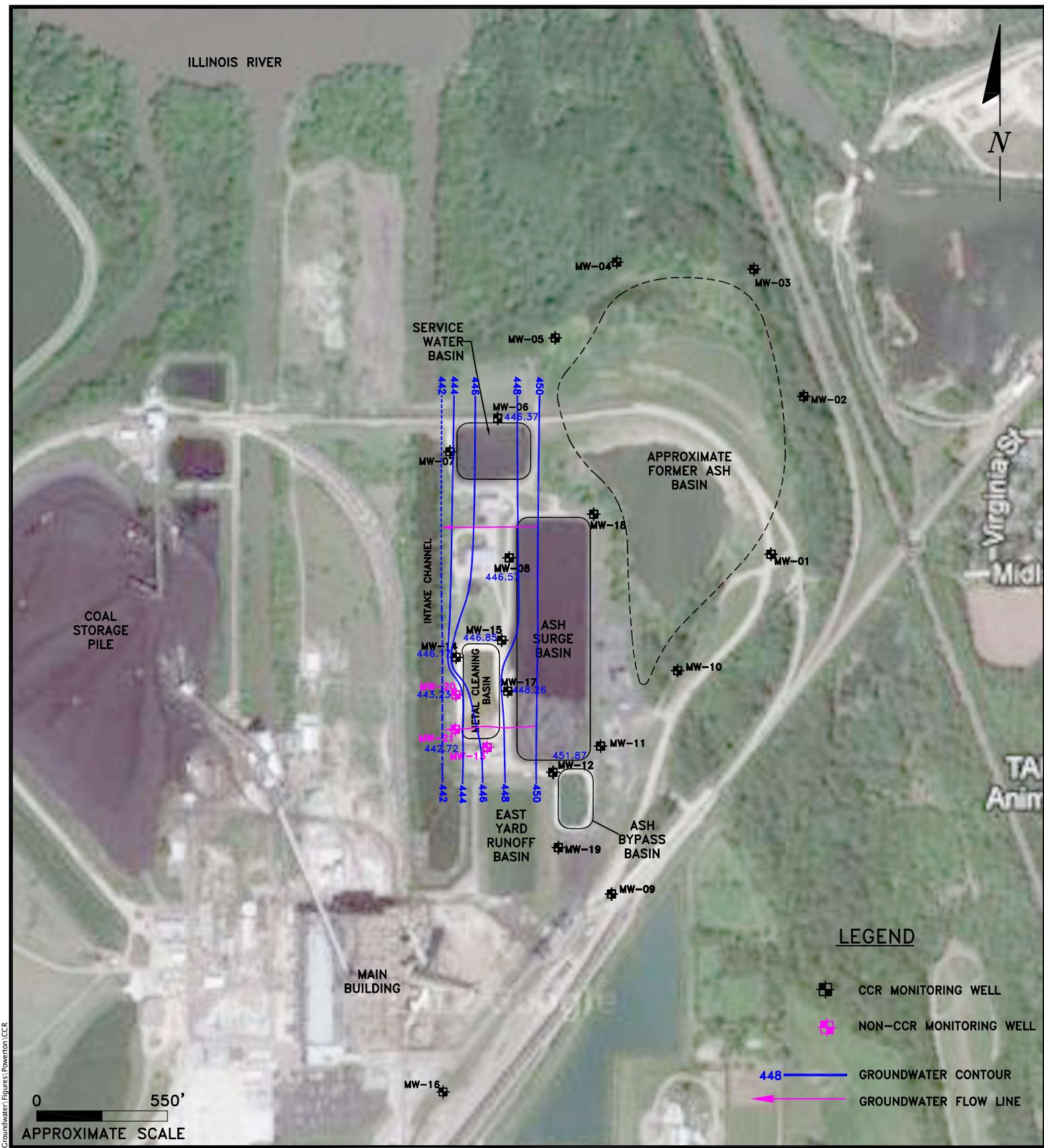
## POTENIOMETRIC MAP SAND/GRAVEL UNIT 01/2024

POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: December 20, 2024

KPRG Project No. 12313.1

ATTACHMENT 1



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14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

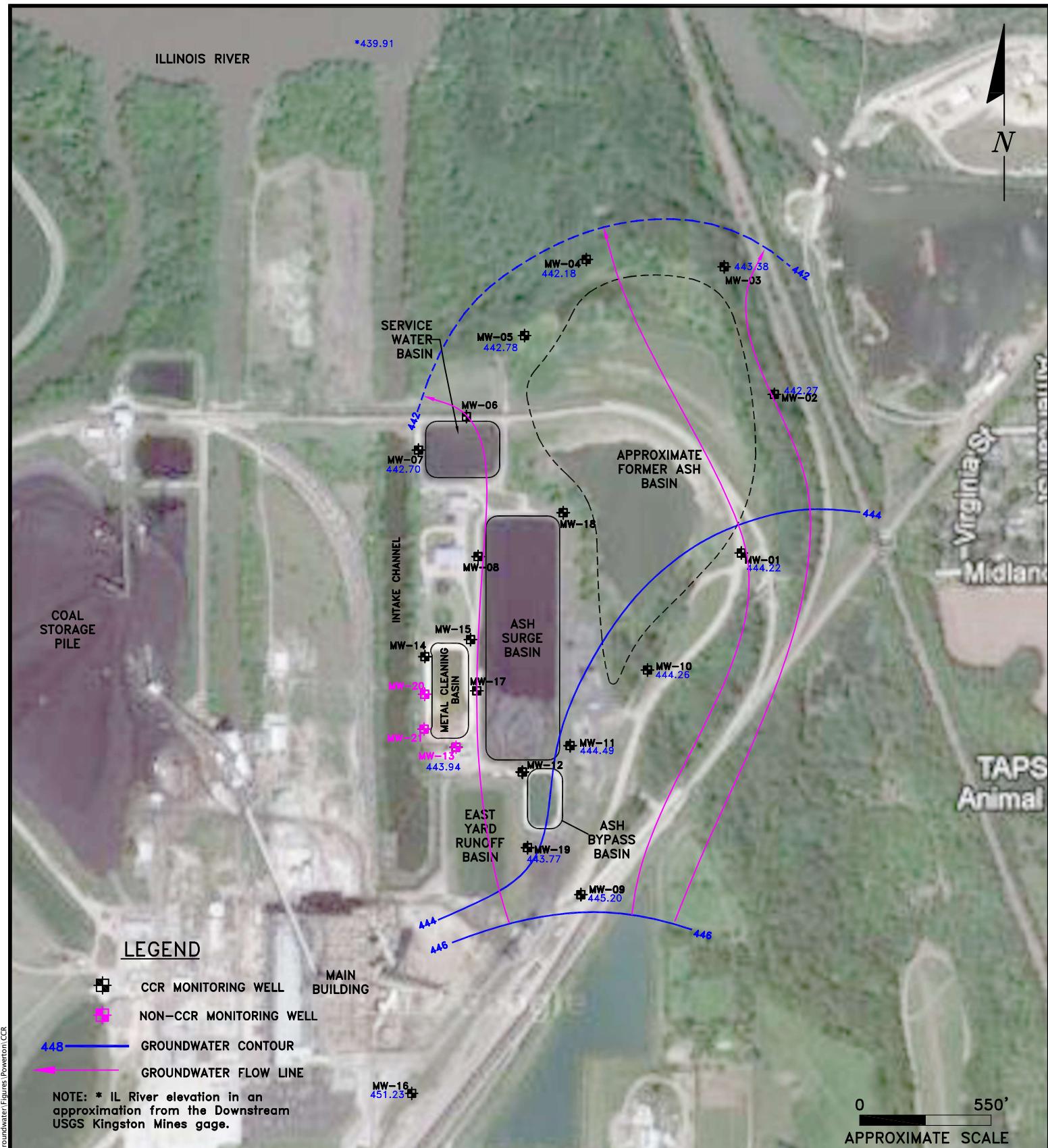
## POTENTIOMETRIC MAP SILT/CLAY UNIT 02/2024

POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: December 23, 2024

KPRG Project No. 12313.1

ATTACHMENT 1



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14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

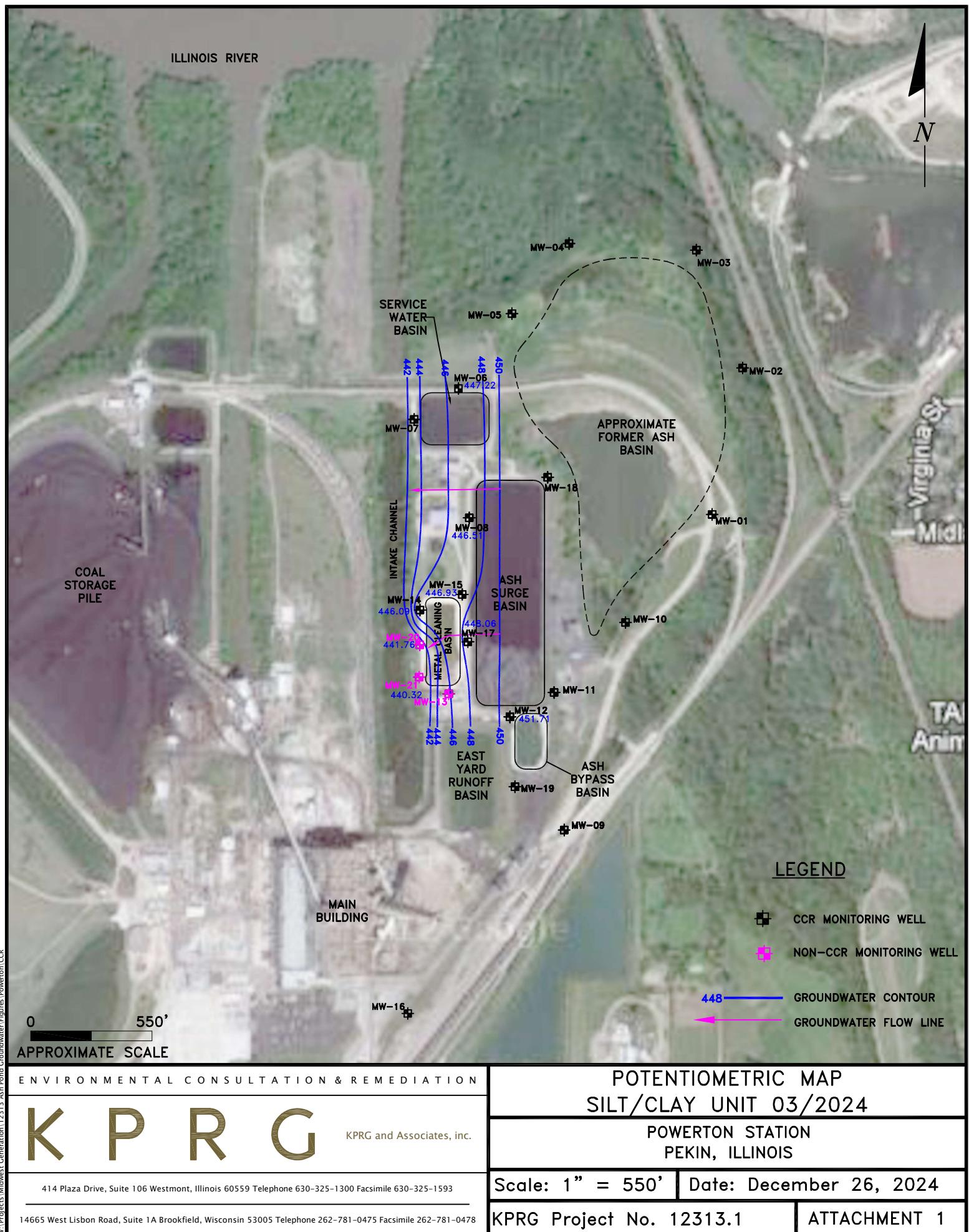
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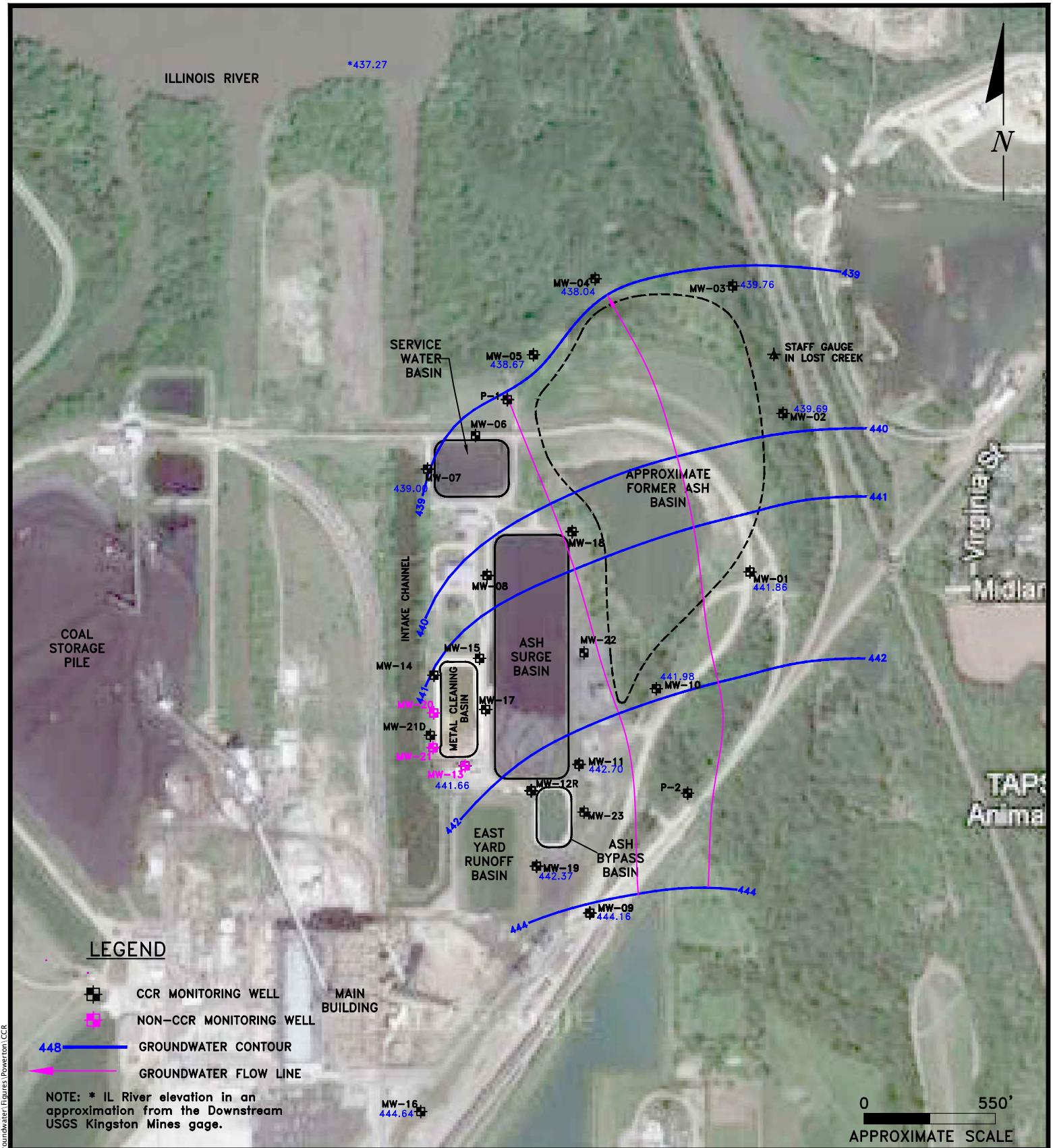
POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: December 26, 2024

KPRG Project No. 12313.1

ATTACHMENT 1





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14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

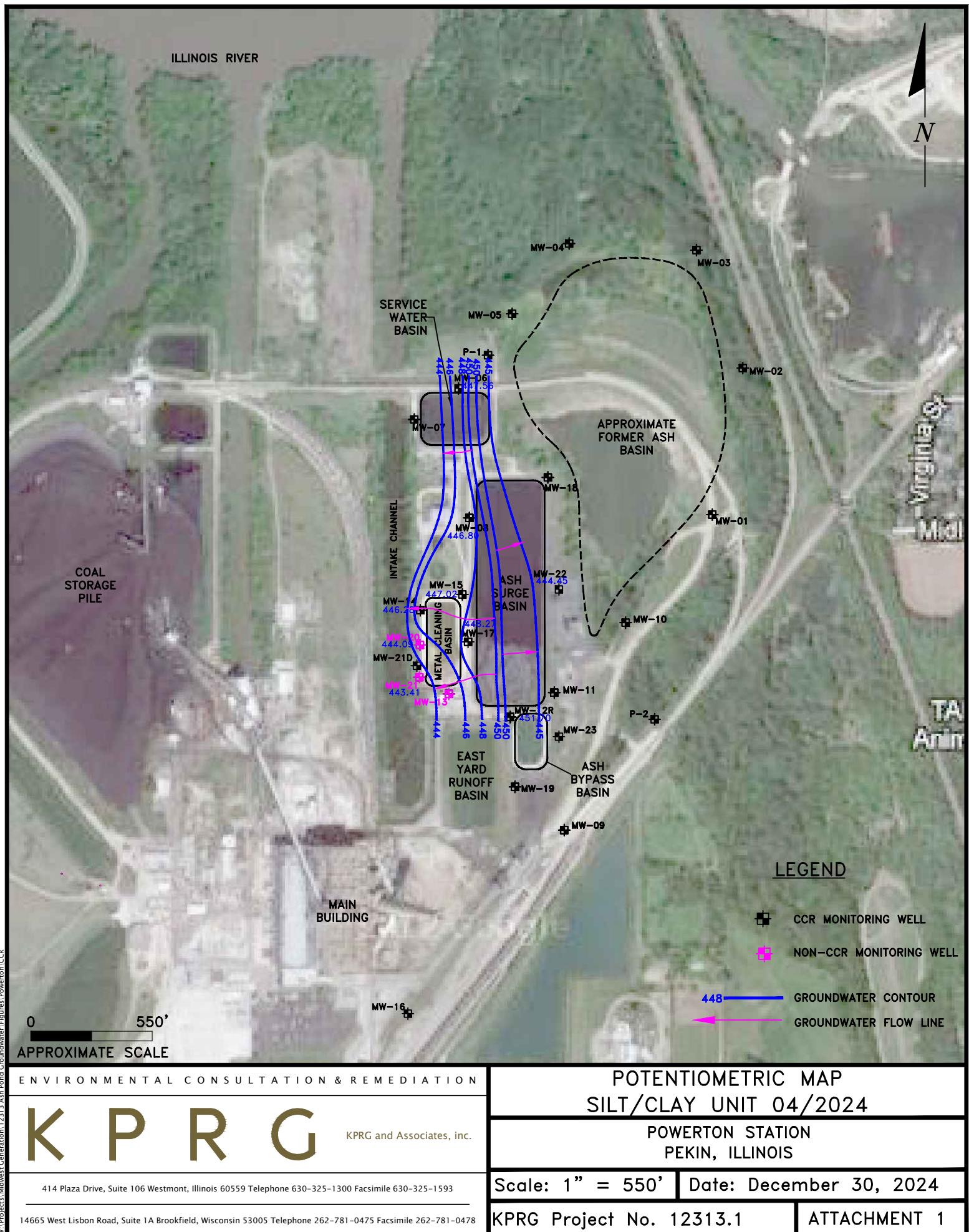
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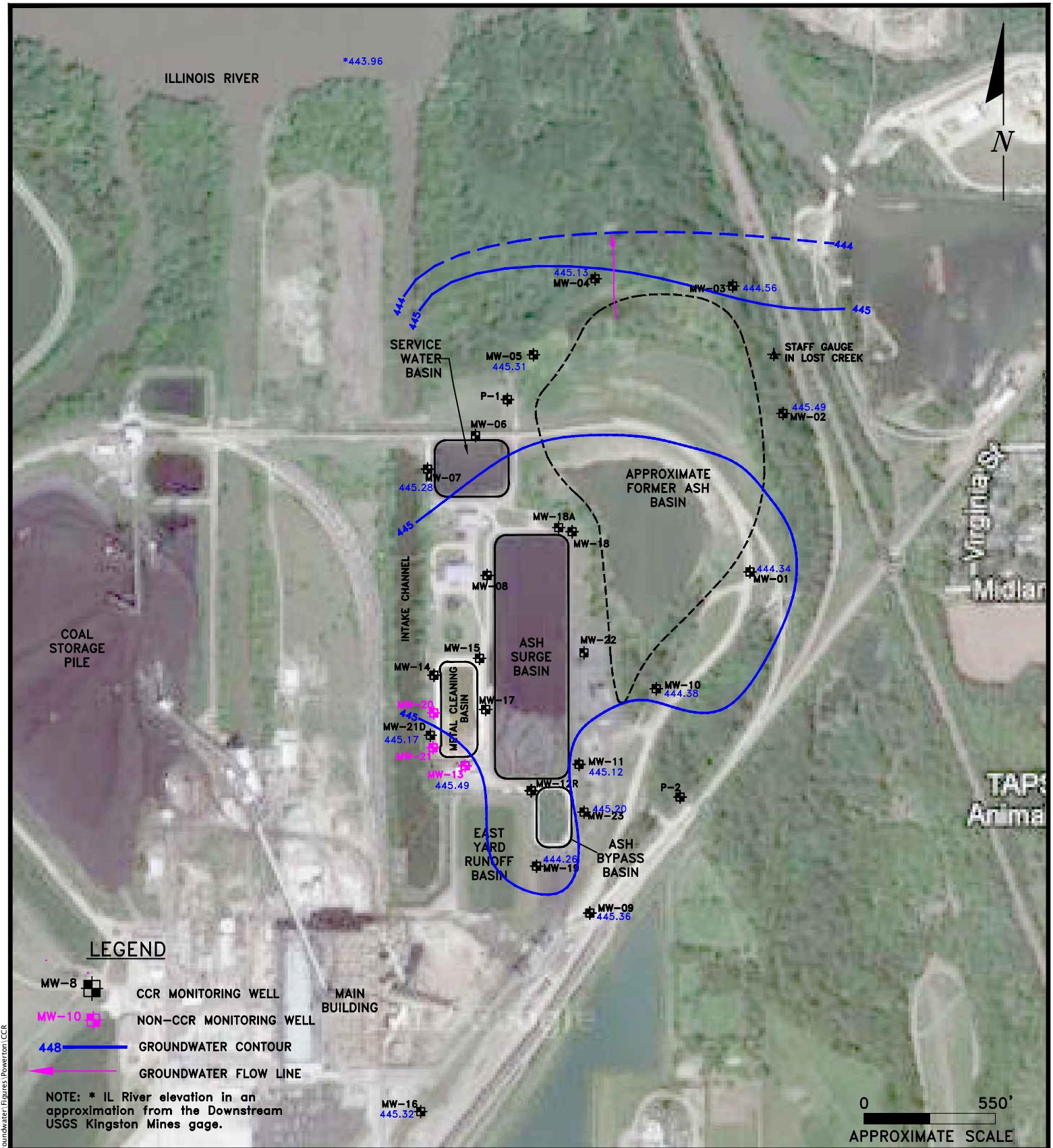
POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: December 26, 2024

KPRG Project No. 12313.1

ATTACHMENT 1





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14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

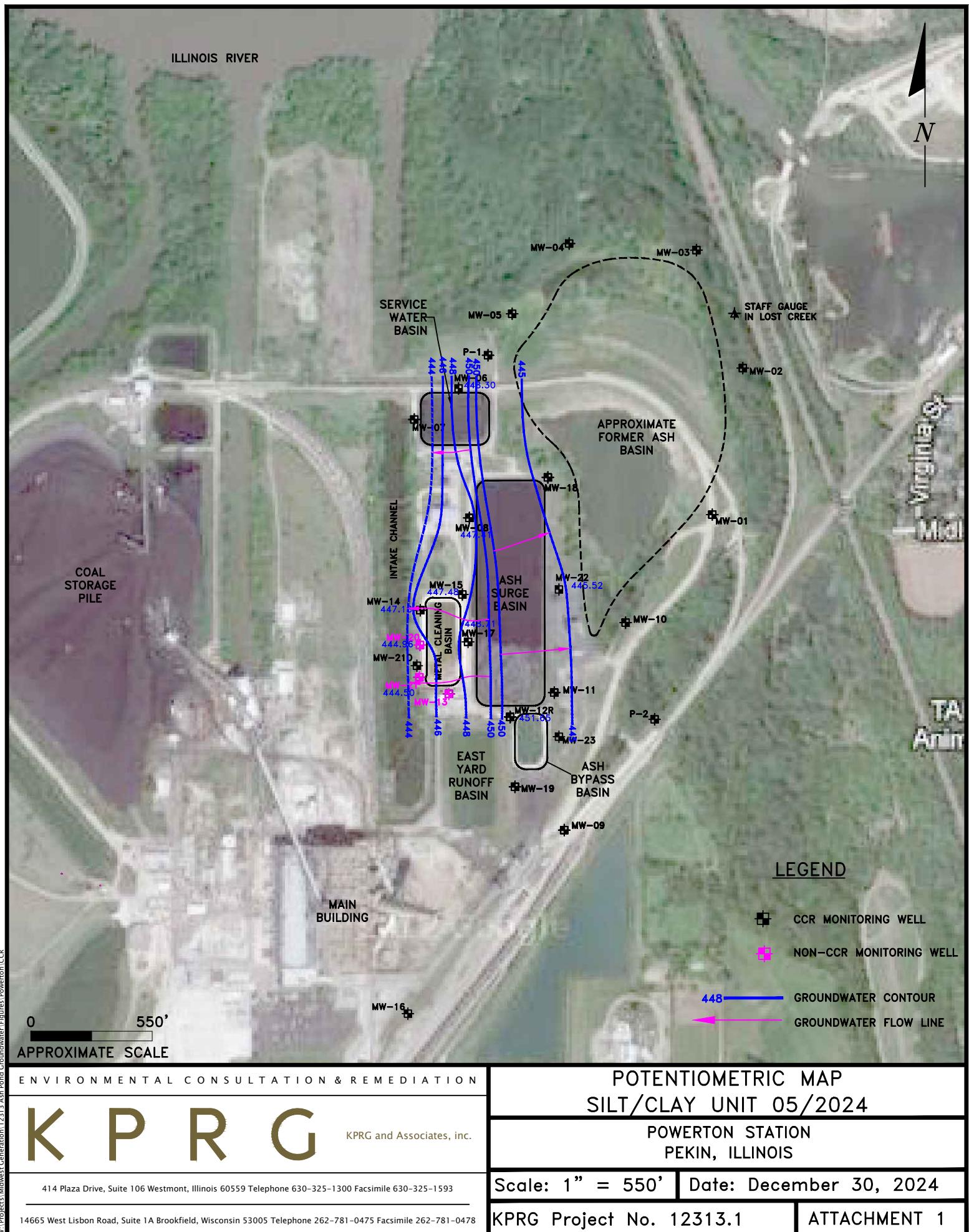
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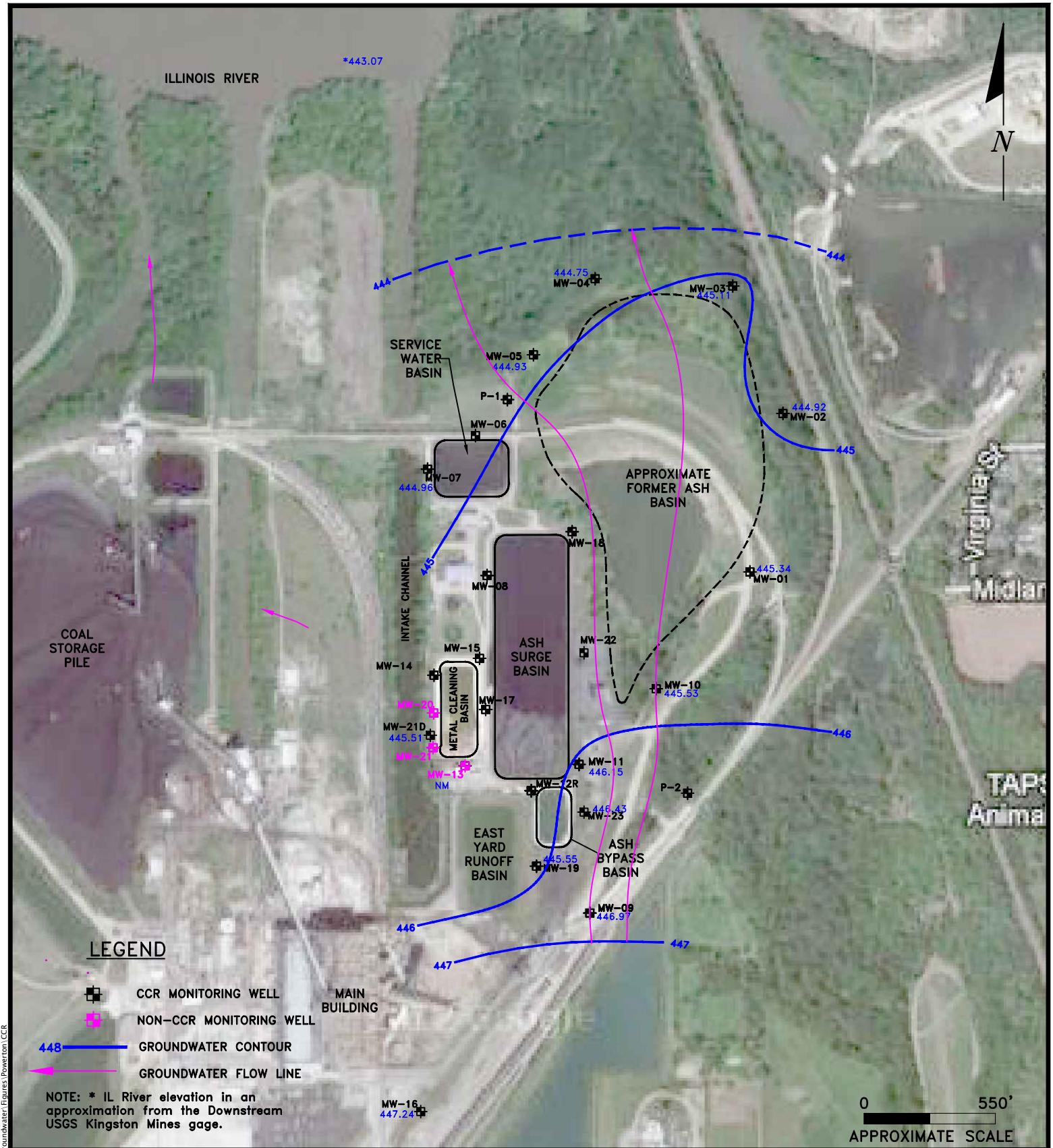
POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: January 14, 2025

KPRG Project No. 12313.1

ATTACHMENT 1





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414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

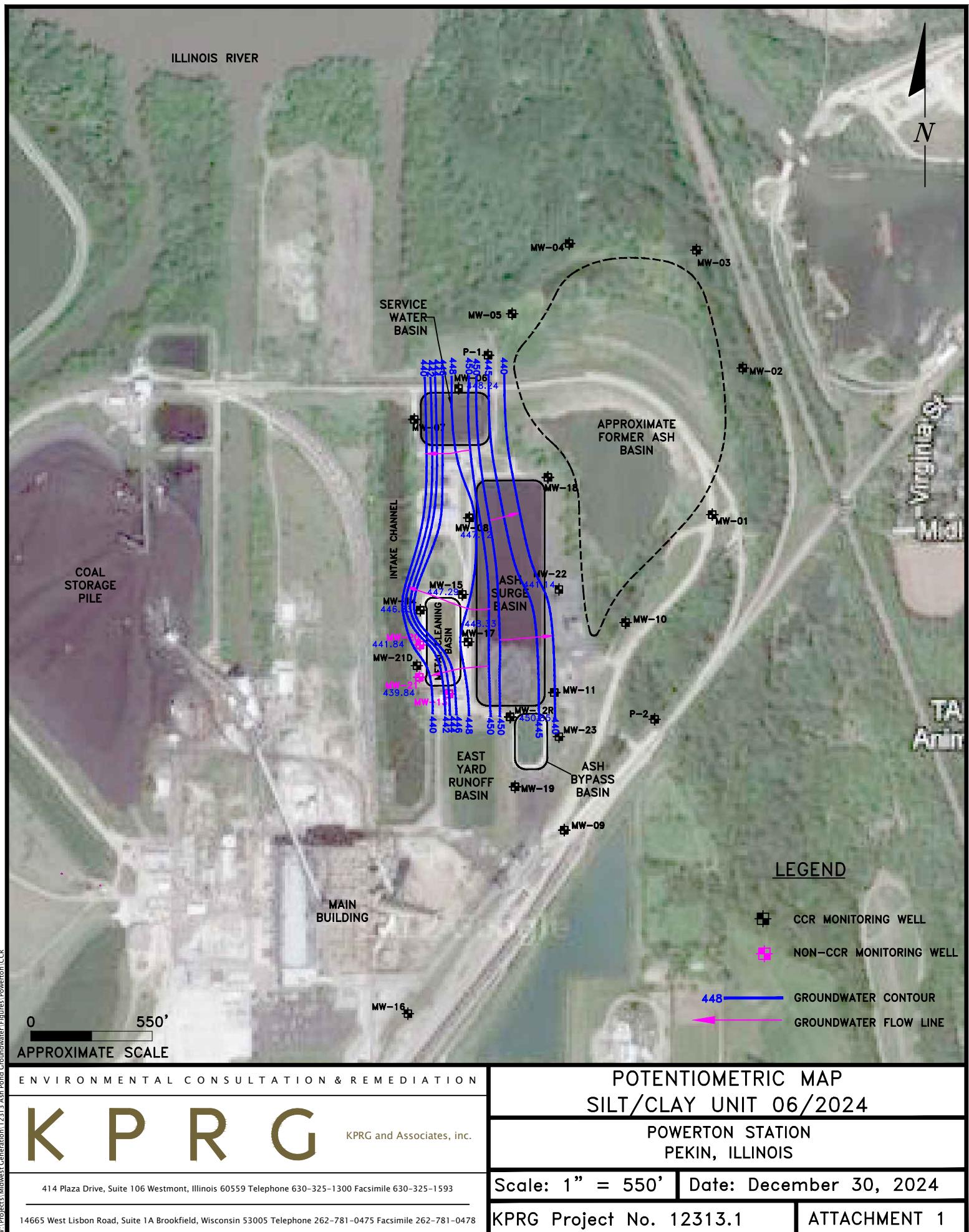
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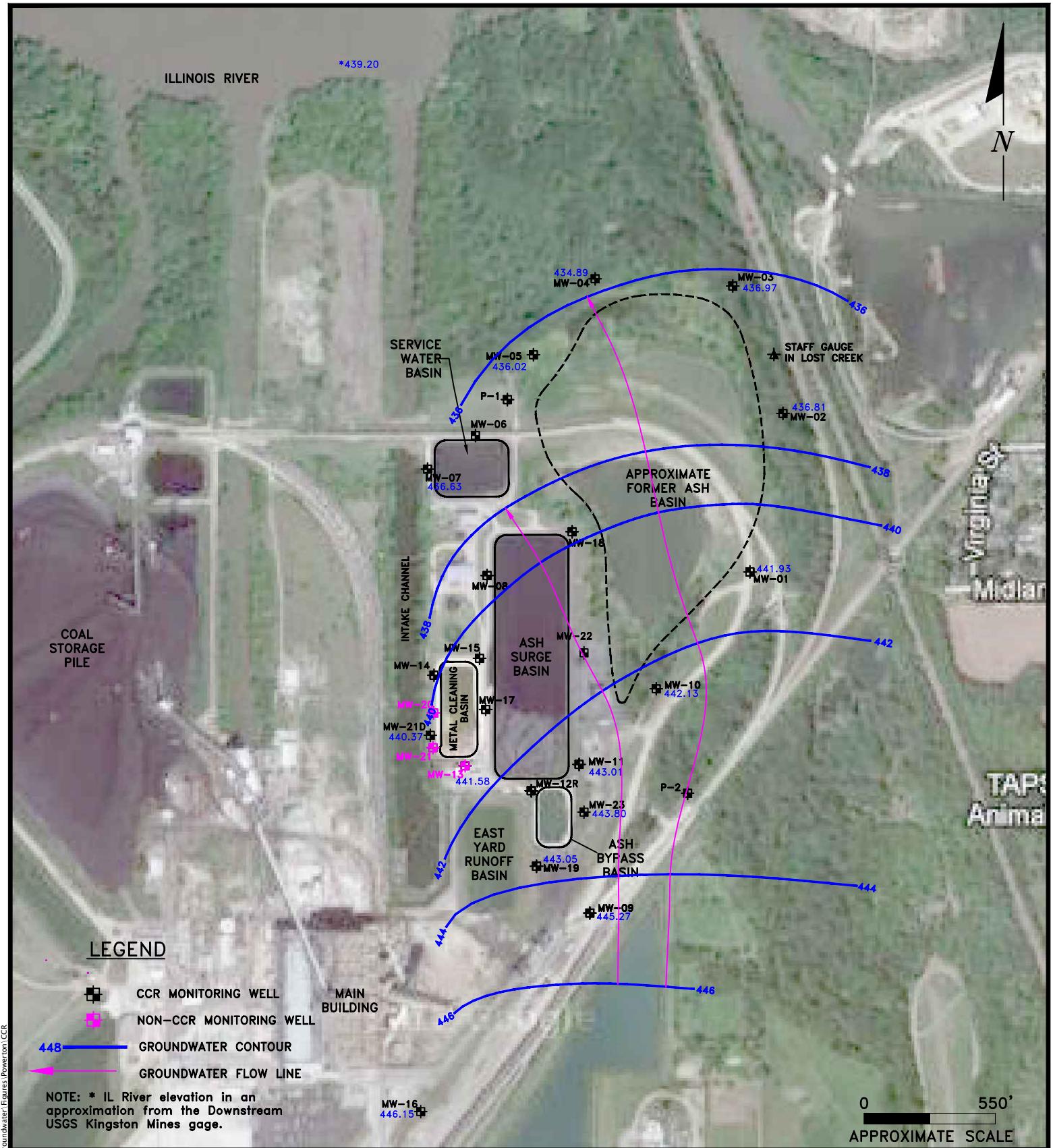
POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: January 2, 2025

KPRG Project No. 12313.1

ATTACHMENT 1





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**K P R G**

KPRG and Associates, inc.

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

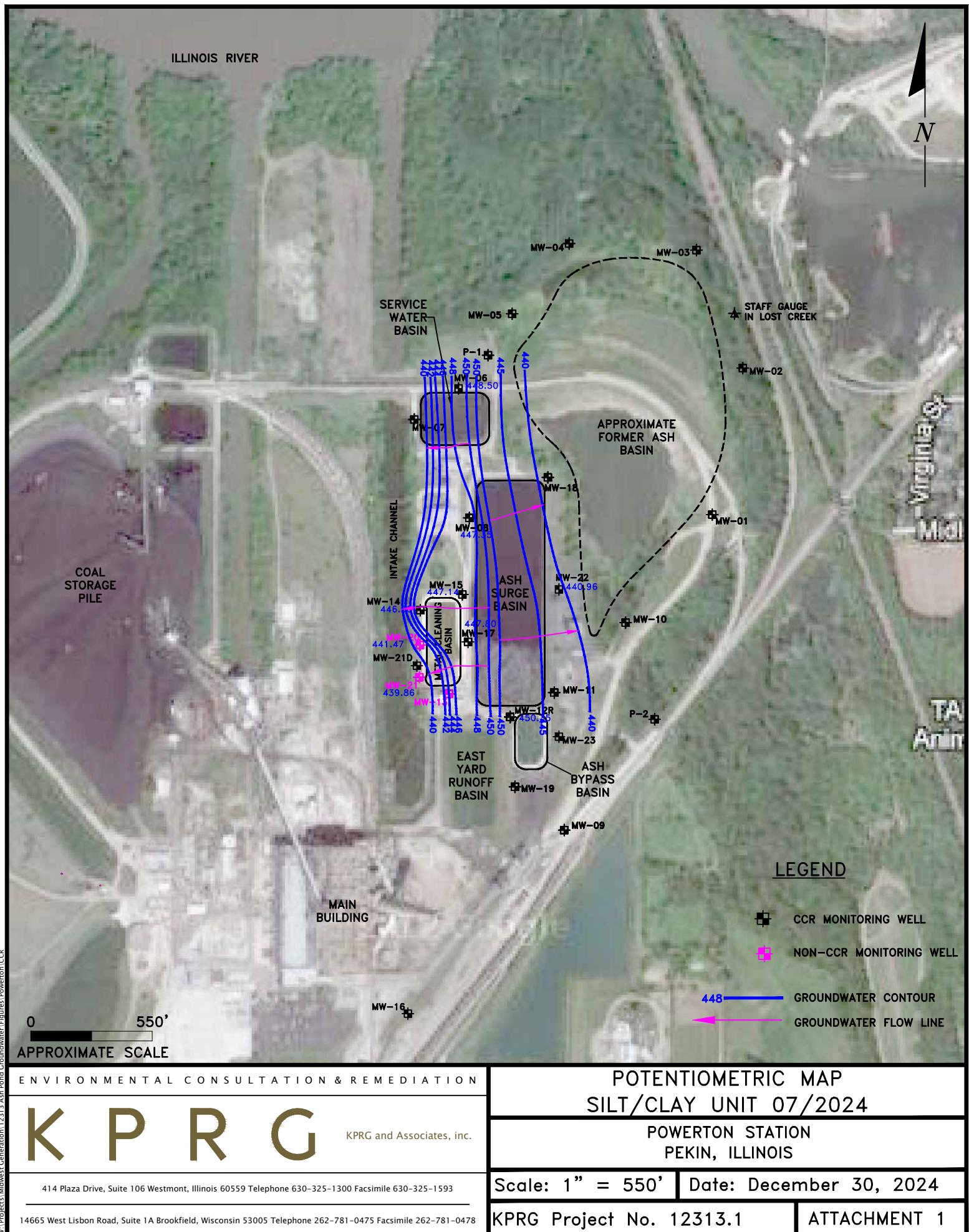
## POTENTIOMETRIC MAP SAND/GRAVEL UNIT 06/2024

POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: December 30, 2024

KPRG Project No. 12313.1

ATTACHMENT 1



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14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

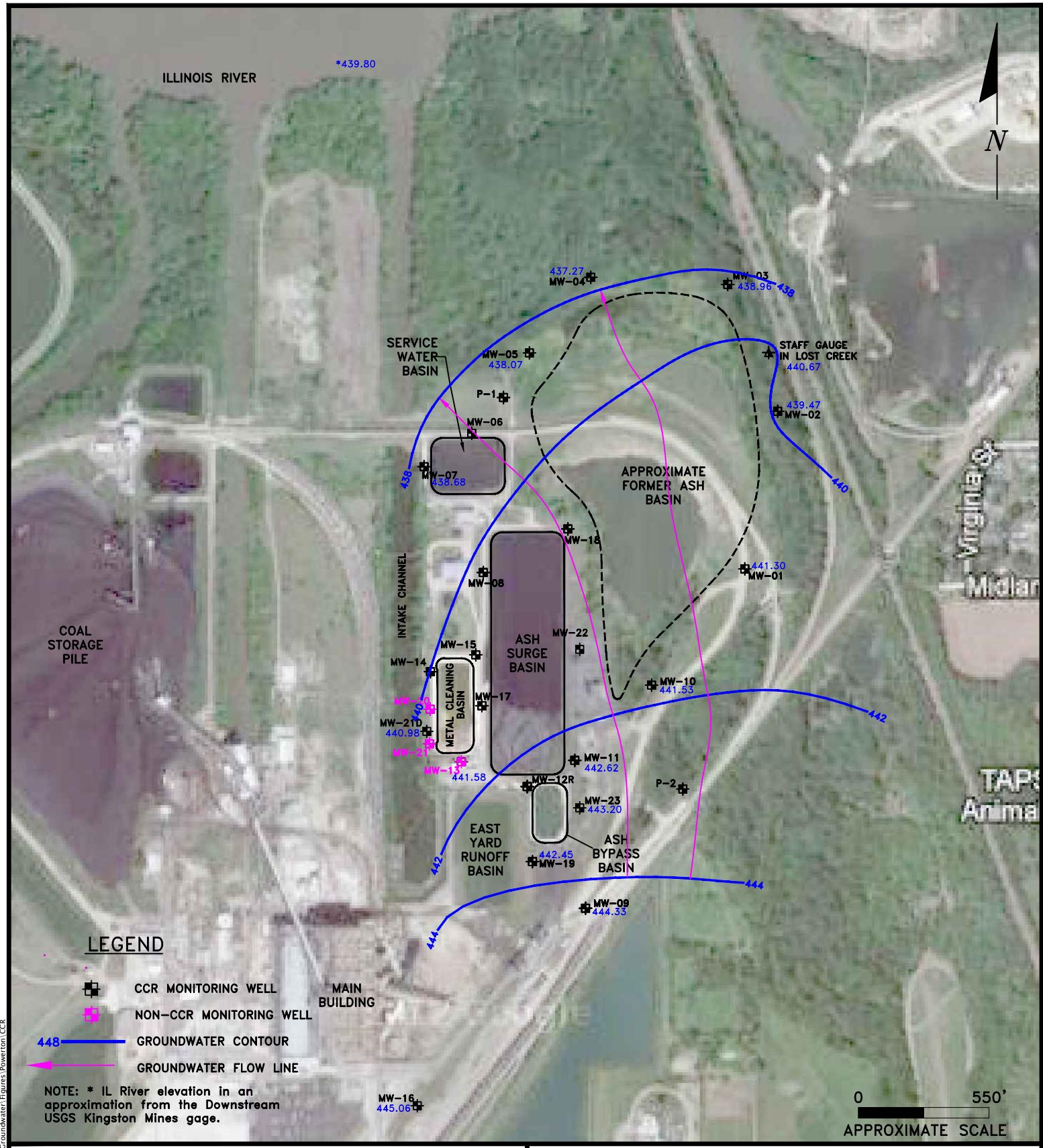
## POTENTIOMETRIC MAP SILT/CLAY UNIT 07/2024

POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: December 30, 2024

KPRG Project No. 12313.1

ATTACHMENT 1



ENVIRONMENTAL CONSULTATION & REMEDIATION

## POTENTIOMETRIC MAP

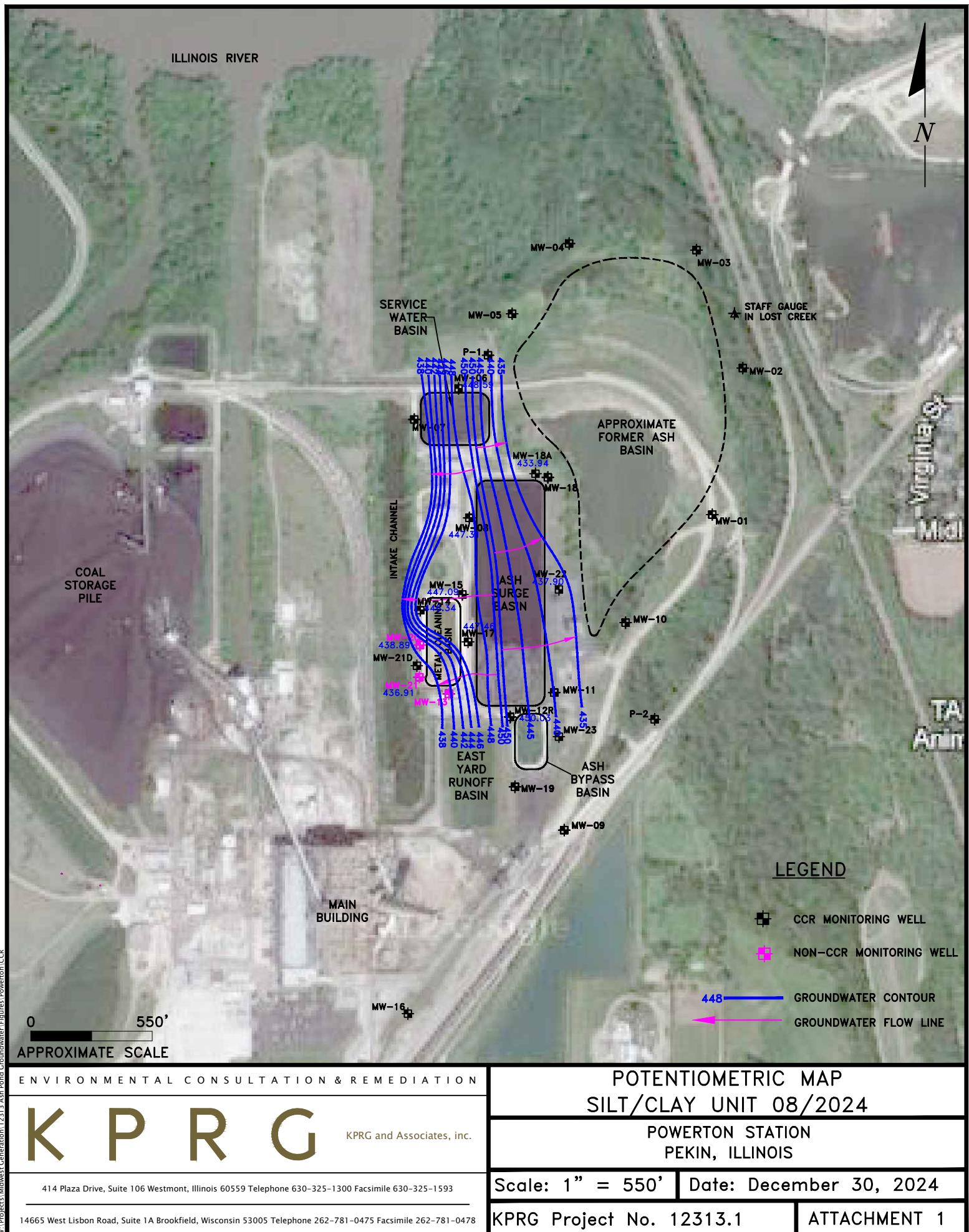
SAND/GRAVEL UNIT 07/2024

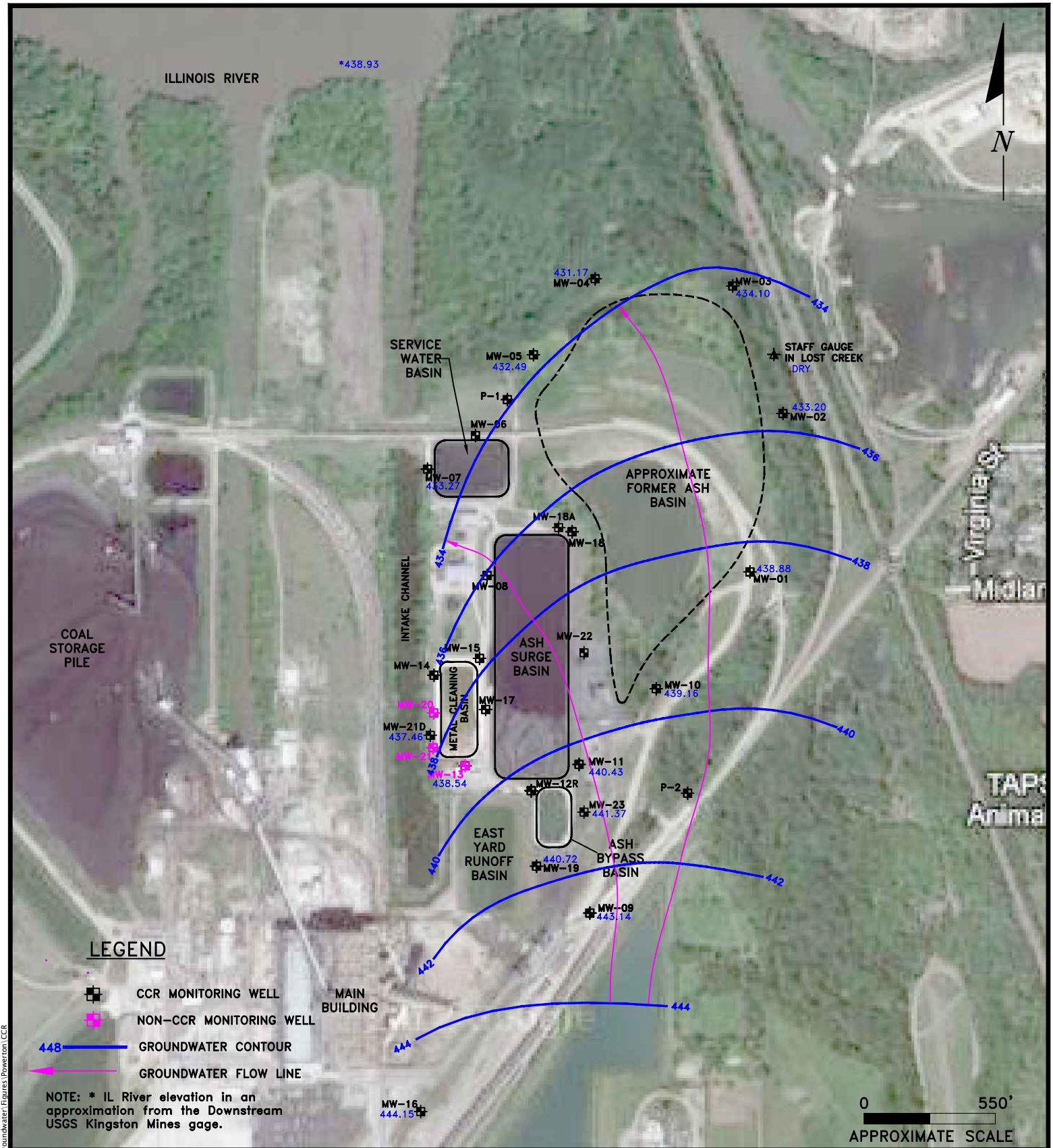
POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: December 31, 2024

KPRG Project No. 12313.1

ATTACHMENT 1





ENVIRONMENTAL CONSULTATION & REMEDIATION

**K P R G**

KPRG and Associates, inc.

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

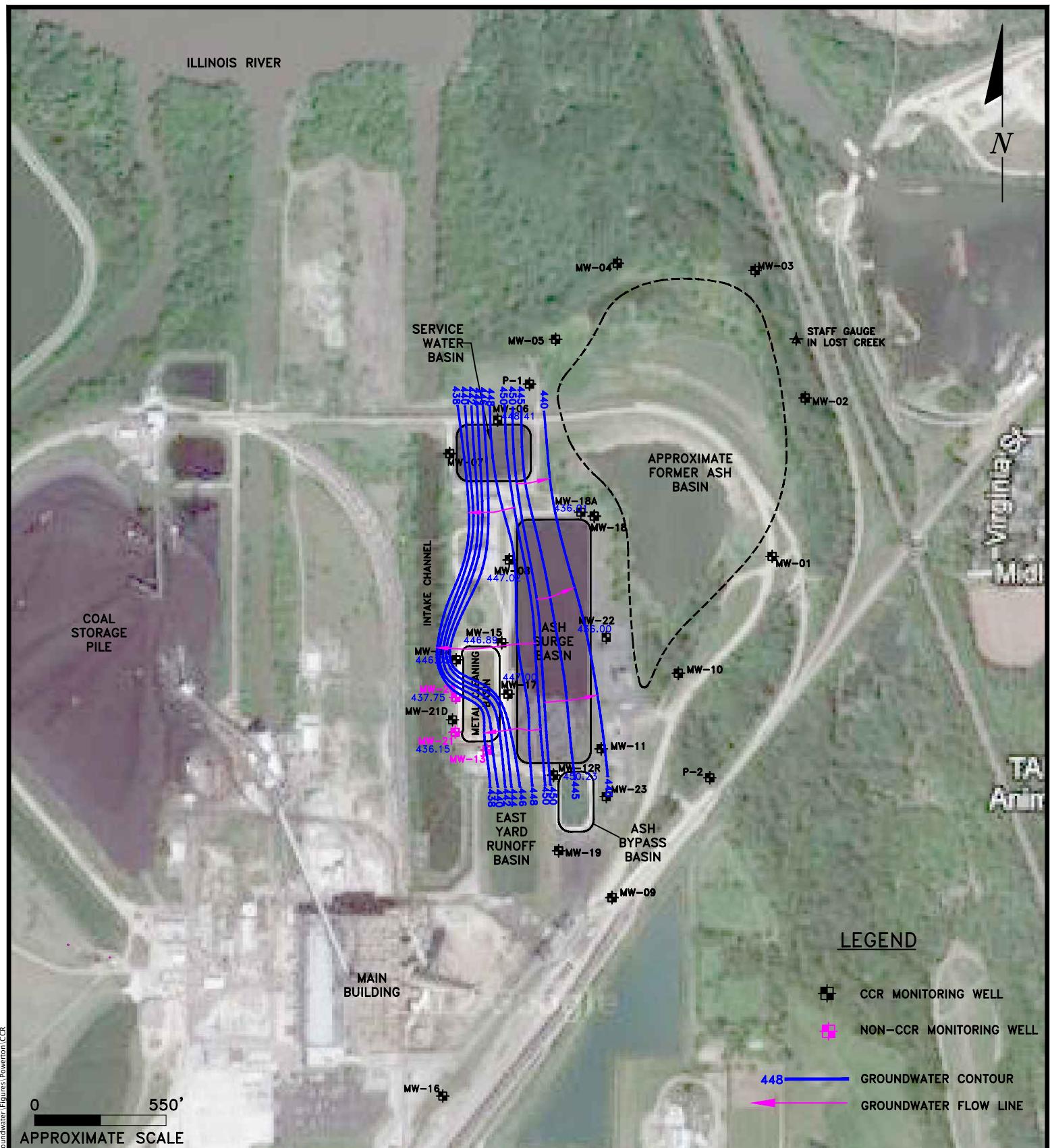
## POTENTIOMETRIC MAP SAND/GRAVEL UNIT 08/2024

POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: December 31, 2024

KPRG Project No. 12313.1

ATTACHMENT 1



## ENVIRONMENTAL

ENVIRONMENTAL CONSULTATION & REMEDIATION

# K P R G

KPRG and Associates, inc.

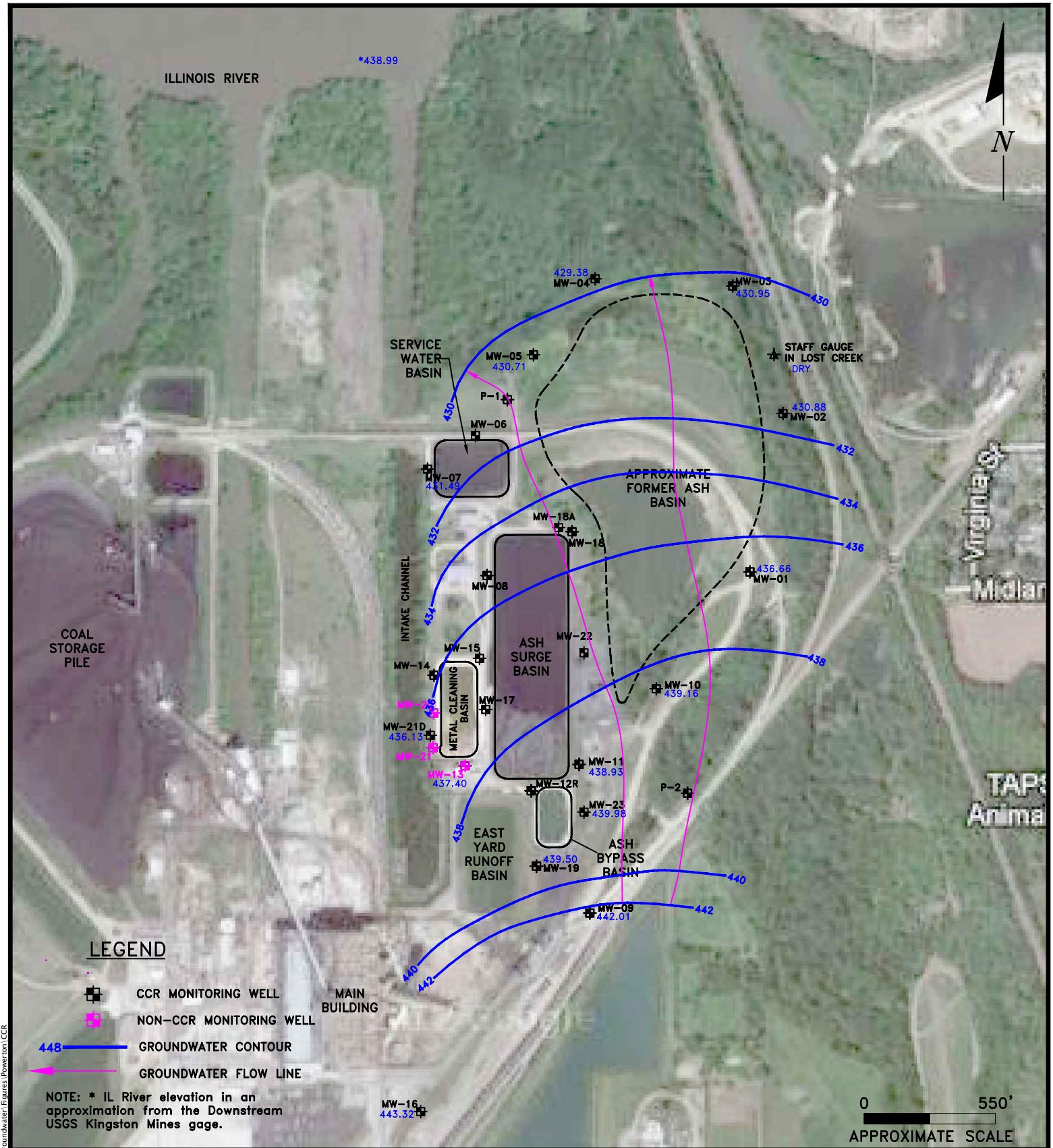
POTENTIOMETRIC MAP  
SILT/CLAY UNIT 09/2024

**POWERTON STATION  
PEKIN, ILLINOIS**

Scale: 1" = 550' Date: December 31, 2024

KPRG Project No. 12313.1

**ATTACHMENT 1**



ENVIRONMENTAL CONSULTATION & REMEDIATION

**K P R G**

KPRG and Associates, inc.

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

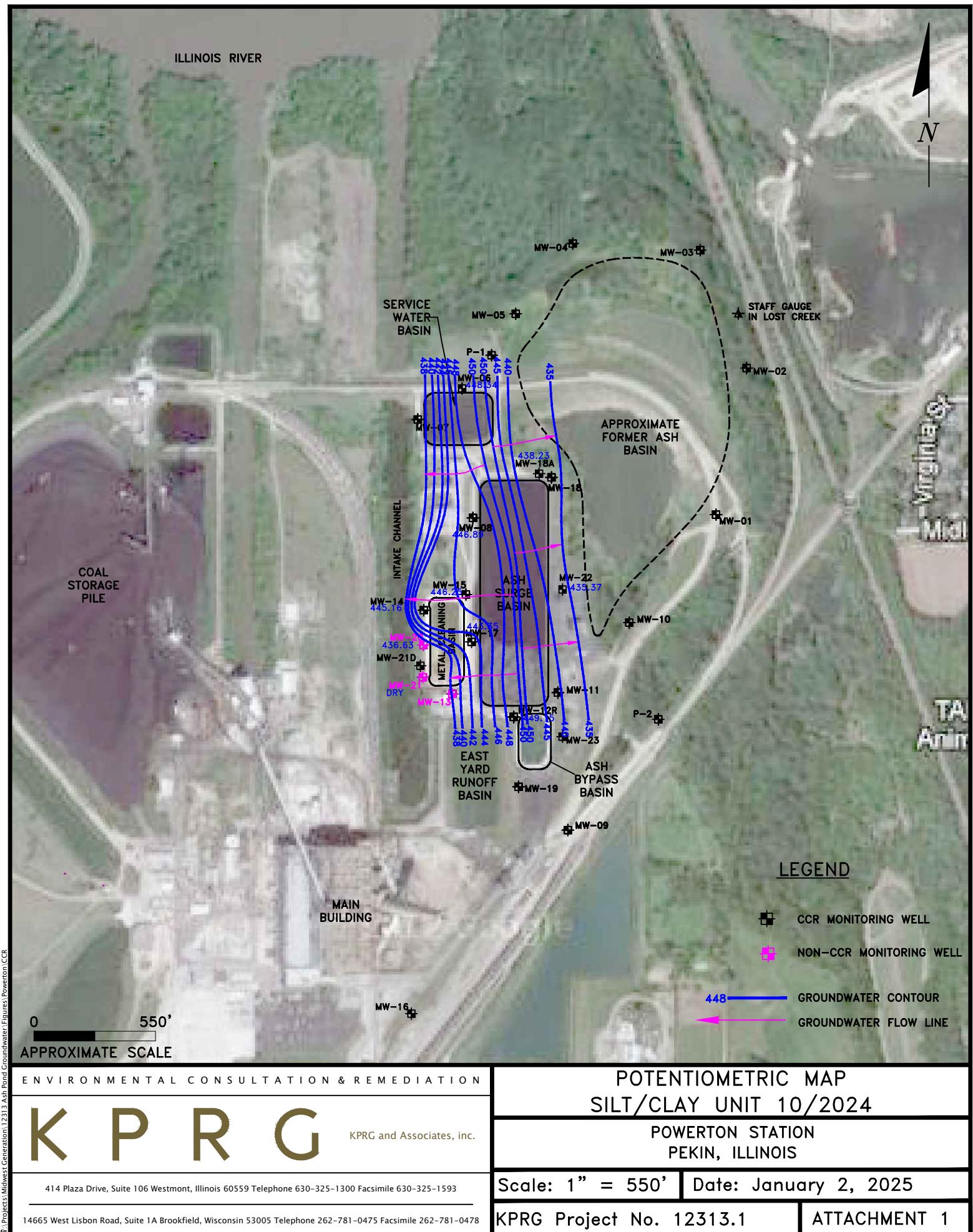
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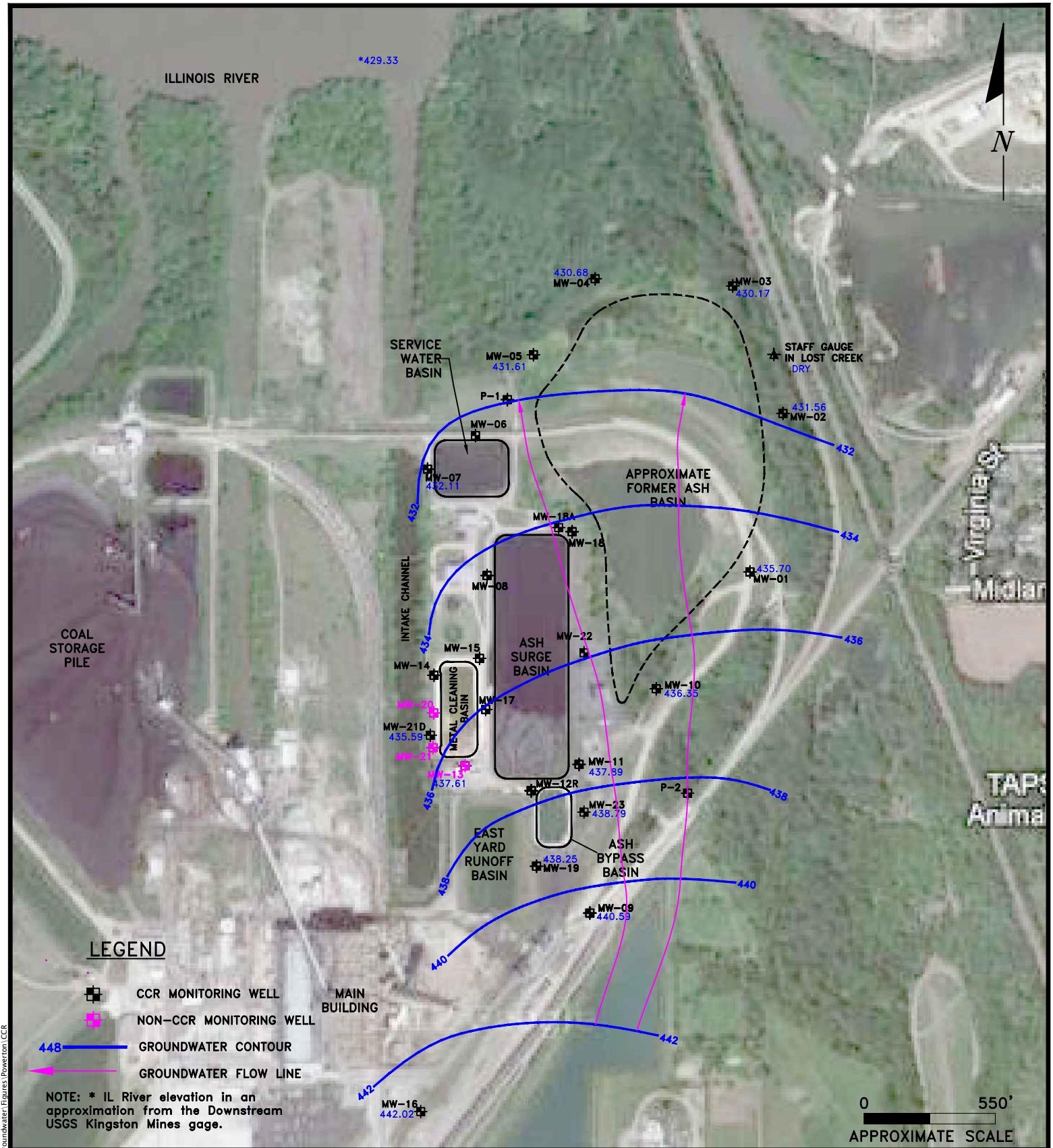
POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: December 31, 2024

KPRG Project No. 12313.1

ATTACHMENT 1





ENVIRONMENTAL CONSULTATION & REMEDIATION

**K P R G**

KPRG and Associates, inc.

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

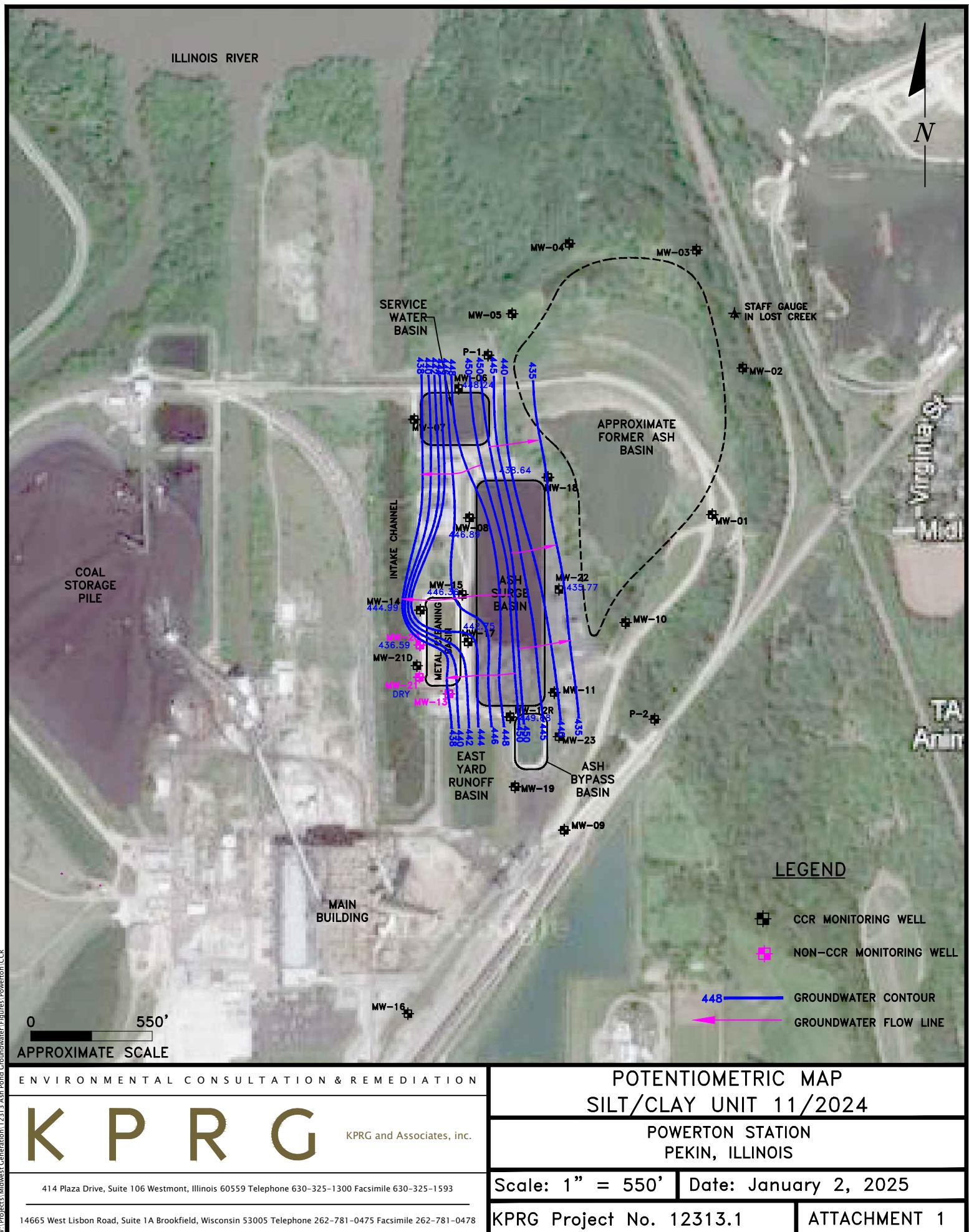
## POTENTIOMETRIC MAP SAND/GRAVEL UNIT 10/2024

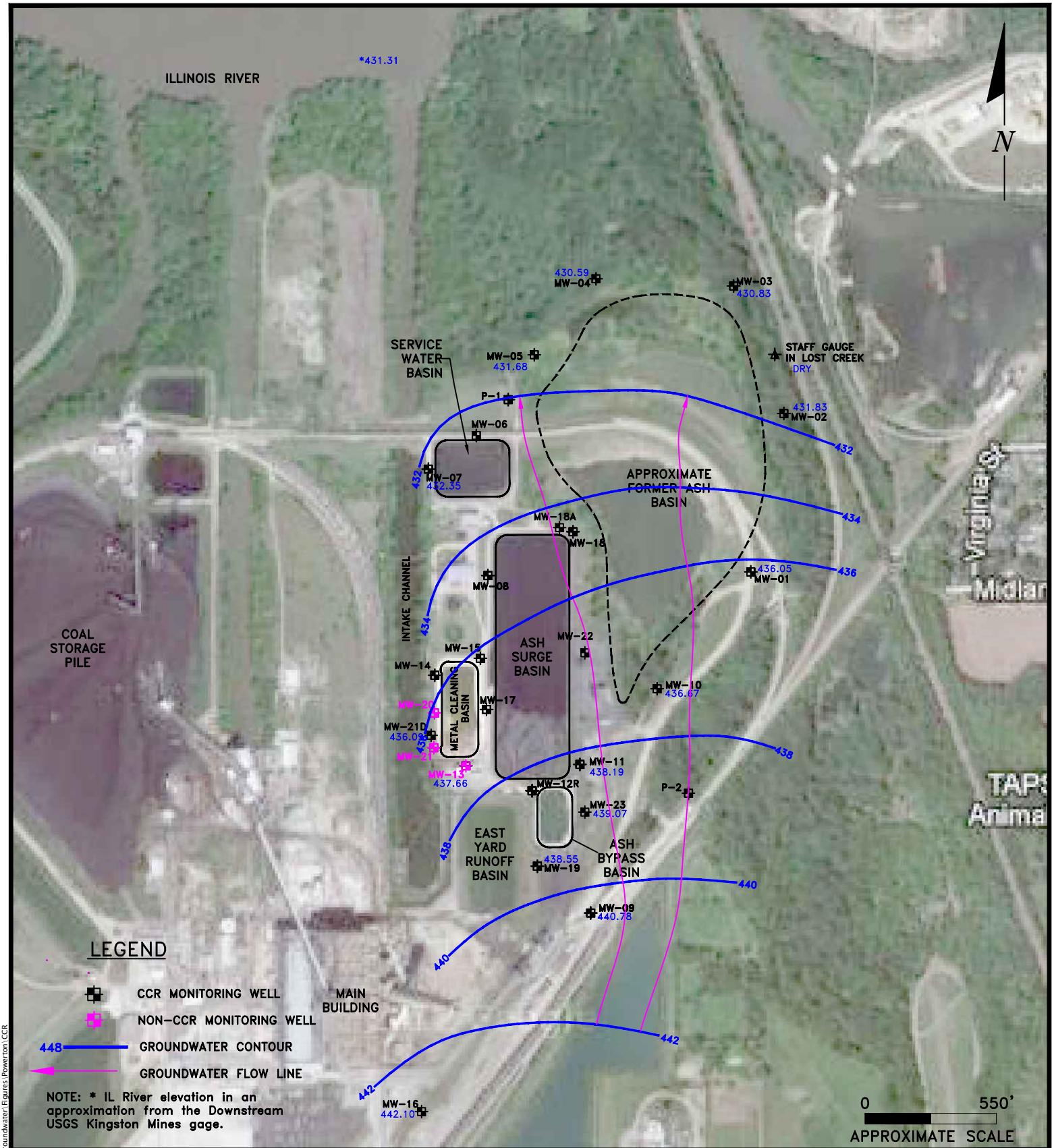
POWERTON STATION  
PEKIN, ILLINOIS

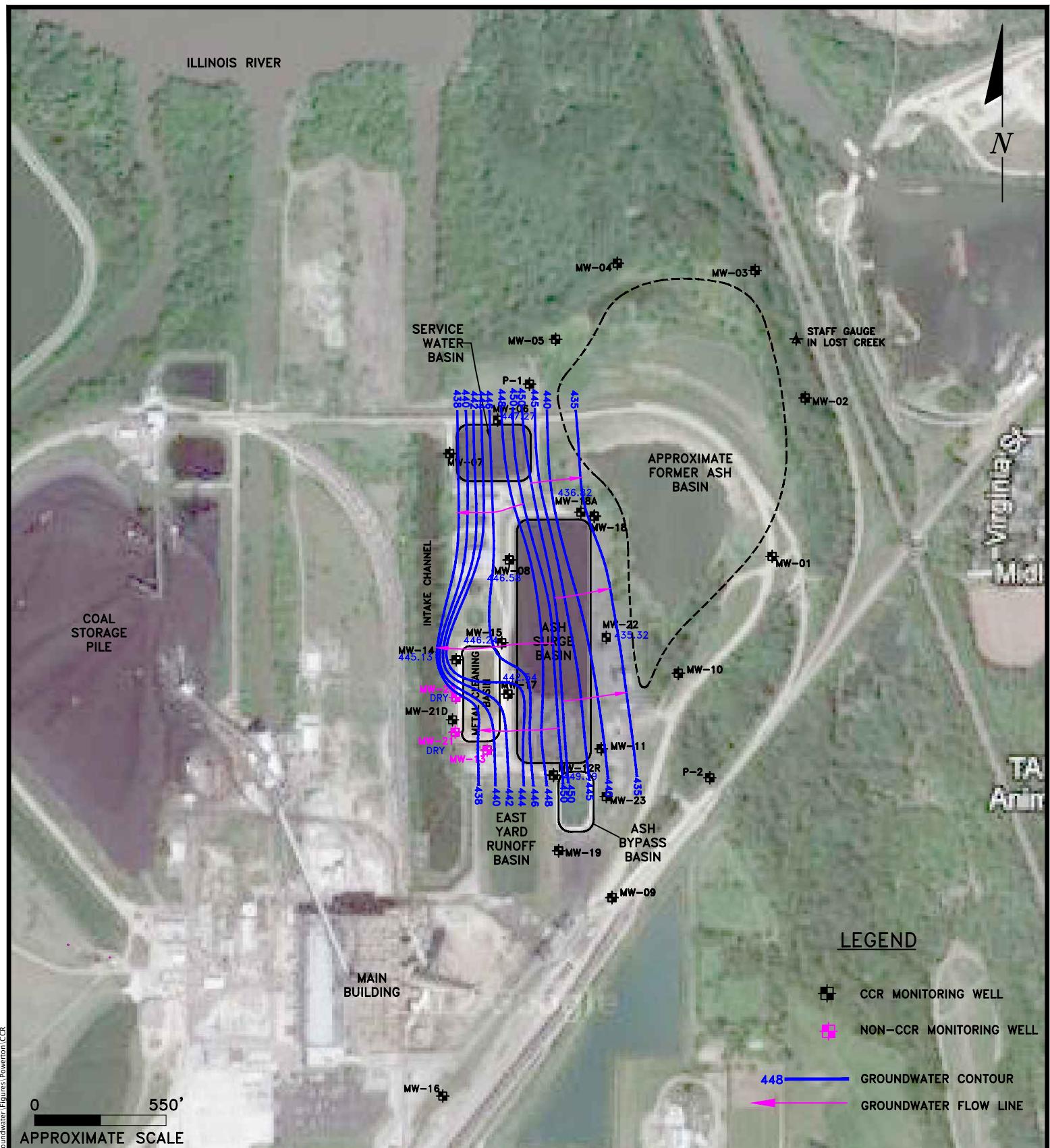
Scale: 1" = 550' Date: December 31, 2024

KPRG Project No. 12313.1

ATTACHMENT 1







ENVIRONMENTAL CONSULTATION & REMEDIATION

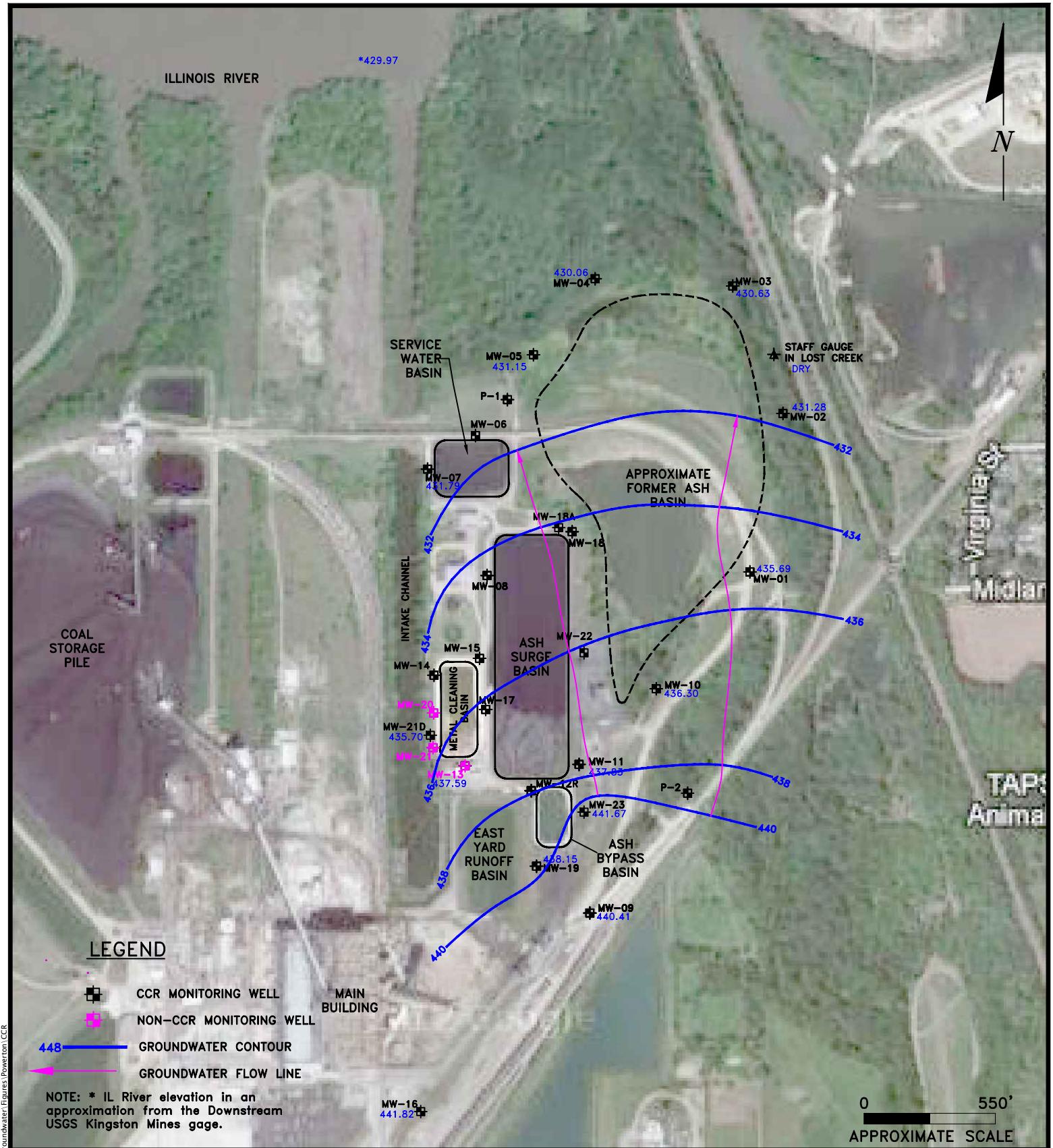
POTENTIOMETRIC MAP  
LT/CLAY UNIT 12/2024

**POWERTON STATION  
PEKIN, ILLINOIS**

Scale: 1" = 550' Date: January 2, 2025

KPRG Project No. 12313.1

**ATTACHMENT 1**



ENVIRONMENTAL CONSULTATION & REMEDIATION

**K P R G**

KPRG and Associates, inc.

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

## POTENTIOMETRIC MAP SAND/GRAVEL UNIT 12/2024

POWERTON STATION  
PEKIN, ILLINOIS

Scale: 1" = 550' Date: December 31, 2024

KPRG Project No. 12313.1

ATTACHMENT 1

**ATTACHMENT D**  
**2024 MONTHLY SURFACE**  
**IMPOUNDMENT WATER ELEVATIONS**

Well ID	Date	Basin Gauge Level (ft)	Basin Surface Elevation (ft above MSL)
Former Ash Basin	12/30/2021	2.6	439.2
	1/6/2022	2.6	439.2
	2/7/2022	2.3	438.9
	3/1/2022	4.6	441.2
	4/22/2022	7.6	444.2
	5/24/2022	6.0	442.6
	6/6/2022	4.9	441.5
	7/25/2022	LOW	LOW
	8/29/2022	LOW	LOW
	9/28/2022	LOW	LOW
	10/26/2022	LOW	LOW
	11/14/2022	LOW	LOW
	12/28/2022	1.6	438.2
	1/24/2023	LOW	LOW
	2/20/2023	LOW	LOW
	3/28/2023	5.5	442.1
	4/25/2023	5.1	441.7
	5/15/2023	2.2	438.8
	6/26/2023	LOW	LOW
	7/25/2023	LOW	LOW
	8/28/2023	LOW	LOW
	9/27/2023	LOW	LOW
	10/27/2023	LOW	LOW
	11/6/2023	LOW	LOW
	12/21/2023	LOW	LOW
	1/24/2024	LOW	LOW
	2/19/2024	6.8	443.4
	3/26/2024	3.68	440.3
	4/12/2024	5.7	442.3
	5/15/2024	7.7	444.3
	6/17/2024	3.9	440.5
	7/25/2024	2.8	439.4
	8/21/2024	LOW	LOW
	9/9/2024	LOW	LOW
	10/29/2024	LOW	LOW
	11/18/2024	LOW	LOW
	12/10/2024	LOW	LOW

Notes: LOW basin gauge level denotes a water level in the basin below the installed gauge height.

Well ID	Date	Basin Gauge Level (ft)	Basin Surface Elevation (ft above MSL)
Metal Cleaning Basin	12/30/2021	DRY	DRY
	1/6/2022	DRY	DRY
	2/7/2022	1.0	456.9
	3/1/2022	1.0	456.9
	4/22/2022	DRY	DRY
	5/24/2022	3.4	459.3
	6/6/2022	DRY	DRY
	8/29/2022	DRY	DRY
	9/28/2022	DRY	DRY
	10/26/2022	DRY	LOW
	11/14/2022	DRY	LOW
	12/28/2022	2.2	458.1
	1/24/2023	2.5	458.4
	2/20/2023	LOW	LOW
	3/28/2023	1.6	457.5
	4/25/2023	8.0	463.9
	5/15/2023	LOW	LOW
	6/26/2023	DRY	DRY
	7/25/2023	LOW	LOW
	8/28/2023	LOW	LOW
	9/28/2023	LOW	LOW
	10/27/2023	0.6	456.5
	11/6/2023	LOW	LOW
	12/21/2023	LOW	LOW
	1/24/2024	0.9	456.8
	2/19/2024	1.0	456.9
	3/26/2024	1.0	456.9
	4/12/2024	2.4	458.3
	5/15/2024	5.9	461.8
	6/17/2024	5.7	461.6
	7/25/2024	0.5	456.4
	8/21/2024	LOW	LOW
	9/9/2024	DRY	DRY
	10/29/2024	DRY	DRY
	11/18/2024	LOW	LOW
	12/10/2024	6.5	462.4

DRY- no water in basin

LOW- water in basin is below installed gauge level

Pond	Date	Basin Gauge Level (ft)	Basin Surface Elevation (ft above MSL)
Ash Bypass Basin	12/30/2021	2.1	459.1
	1/6/2022	2.2	459.2
	2/7/2022	2.2	459.2
	3/1/2022	2.2	459.2
	4/22/2022	1.5	459.2
	5/24/2022	3.3	460.3
	6/6/2022	2.1	459.1
	8/29/2022	1.6	458.6
	9/28/2022	1.3	458.7
	10/26/2022	1.4	458.4
	11/14/2022	1.4	458.4
	12/28/2022	2.0	459
	1/24/2023	2.0	459
	2/20/2023	2.0	459
	3/28/2023	1.9	458.9
	4/25/2023	1.9	458.9
	5/15/2023	1.9	458.9
	6/26/2023	LOW	LOW
	7/25/2023	1.0	458
	8/28/2023	1.8	458.8
	9/28/2023	1.7	458.8
	10/27/2023	1.9	458.9
	11/6/2023	1.8	458.8
	12/21/2023	2.0	459
	1/24/2024	2.4	459.7
	2/19/2024	2.2	459.2
	3/26/2024	DRY	DRY
	4/12/2024	DRY	DRY
	5/15/2024	DRY	DRY
	6/17/2024	DRY	DRY
	7/25/2024	DRY	DRY
	8/21/2024	DRY	DRY
	9/9/2024	DRY	DRY
	10/29/2024	4.7	461.7
	11/18/2024	4.4	461.4
	12/10/2024	4.5	461.5

DRY- Ash Bypass Basin pond was emptied for new liner.

LOW- Water level in basin was below installed gauge.

Pond	Date	PI System Reading (in)	Basin Surface Elevation (ft above MSL)
Ash Surge Basin	12/30/2021	44.0	462.33
	1/6/2022	38.0	461.83
	2/7/2022	57.0	463.42
	3/1/2022	44.0	462.33
	4/22/2022	52.0	463.00
	5/24/2022	44.0	462.33
	6/6/2022	37.0	461.75
	8/29/2022	49.0	462.75
	9/28/2022	58.0	463.50
	10/26/2022	50.0	462.83
	11/14/2022	45.0	462.42
	12/28/2022	56.0	463.33
	1/24/2023	50.0	462.83
	2/20/2023	41.0	462.08
	3/28/2023	52.0	463.00
	4/25/2023	53.0	463.08
	5/15/2023	50.0	462.83
	6/26/2023	45.0	462.42
	7/25/2023	70.0	464.50
	8/28/2023	49.0	462.75
	9/28/2023	55.0	463.25
	10/27/2023	65.0	464.1
	11/6/2023	43.0	462.3
	12/21/2023	61.0	464.9
	1/24/2024	50.0	461.7
	2/19/2024	48.8	461.8
	3/26/2024	55.3	462.0
	4/12/2024	44.1	461.2
	5/15/2024	45.6	461.4
	6/17/2024	60.0	462.6
	7/25/2024	53.1	462.0
	8/21/2024	51.4	461.9
	9/9/2024	53.0	462.0
	10/29/2024	9.1	458.3
	11/18/2024	10.0	458.3
	12/10/2024	10.0	458.3

Note: On October 15, 2024 the Ash Surge Basin was taken out of service.