

2022 ANNUAL CONSOLIDATED REPORT WILL COUNTY GENERATING STATION

POND 1N – W19781011-01
POND 1S – W19781011-02
POND 2S – W19781011-03
POND 3S – W19781011-04

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CERTIFICATION

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ATTACHMENT A
2022 ANNUAL CCR FUGITIVE DUST
CONTROL REPORT

Annual CCR Fugitive Dust Control Report
Will County Generating Station
529 East 135th Street/Romeoville, Illinois

1.0 Introduction

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 Will County Generating Station, operated by Midwest Generation, LLC (MWG), is located at 529 East 135th Street, Romeoville, Will County, Illinois. The facility is a retired coal-fired electric power generating station that occupies approximately 200 acres. The last remaining coal-fired unit at the Station, Unit 4, ceased operation in June 2022. Electrical power was transmitted from the site to the area grid through overhead transmission power lines. The Rule applies to this facility due to the disposal management of CCR that is generated from the combustion of coal. CCR units associated with the station include the Pond 1 North (1N), Pond 2 South (1S), South Ash Pond 2 and South Ash Pond 3.

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 Rule and placed in the Will County 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 2022 Annual Report for Will County 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
Will County Generating Station
529 East 135th Street/Romeoville, Illinois

2.0 Actions Taken to Control CCR Fugitive Dust

As detailed in the 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 South Ash Pond 2. A significant portion of the piping system is contained within a building, which eliminates dust emissions to the outside environment. 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.

With the retirement of Unit 4, placement of bottom ash and slag using the Bottom Ash and Slag Distribution System ceased in 2022.

2.2 South Ash Pond 2 and South Ash Pond 3

During normal operations, the South Ash Pond 2 is filled with water thereby suppressing any potential fugitive dust emissions. South Ash Pond 3 was previously filled with water when it was operational and remains filled with water despite being out of service. Infrequently, when South Ash Pond 2 needs to be dewatered and the sediment removed off site to a licensed landfill, 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 ponds are 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, the height of the staged material is minimized, and the material piles are either sprayed with water or covered. Loading activities also are limited during such occasions. Haul trucks are covered with tarps once they have been loaded.

There were no ash removal activities from the Ash Ponds conducted during this reporting period.

Annual CCR Fugitive Dust Control Report
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529 East 135th Street/Romeoville, Illinois

2.3 Ash Pond 1N and Ash Pond 1S

Ash Pond 1N and Ash Pond 1S are inactive surface impoundments and no longer receive bottom ash or slag. The bottom ash/slag material remains within each pond. Precipitation that falls on the bottom ash/slag prevents it from drying out and becoming airborne. Standing water is not present and excessive precipitation that enters each pond will drain out of the pond into the outlet trough. The bottom ash/slag is substantially vegetated with minimal amounts of ash exposed. Some ash does have the potential to become airborne especially during excessively dry and windy conditions. Each pond will be assessed at least quarterly or more frequent during excessively dry and windy conditions. To minimize fugitive dust emissions from exposed dry bottom ash and slag, the material will be sprayed with water, as needed.

2.4 Fly Ash Handling Equipment

Fly ash from the mechanical separators was sent to the silos within enclosed piping. At the silos, the fly ash was drop loaded into a tank truck through a telescopic, baghouse-controlled drop chute. This loading mechanism minimizes the potential for fly ash to become airborne during the loading process. The loading of trucks also occurred within a partial enclosure. At the completion of loading, the truck moved a short distance to an elevated truck stand where it was broom swept to remove any accumulated fly ash. Accumulated ash was promptly transferred to the fly ash concrete storage pad.

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 conducts weekly inspections of the process to confirm compliance. A record of the inspections is maintained.

With the retirement of Unit 4, fly ash generation ceased in 2022; however, removal activities are still ongoing.

2.5 Concrete Storage Pad

The concrete pad only periodically contains bottom ash and slag, fly ash and other ash-related materials generated from routine maintenance activities. Typically, these materials are in a wet state but are allowed to partially dry to facilitate removal. When sufficiently dry, the material is promptly removed to an off-site licensed landfill. The concrete pad is assessed on a quarterly

Annual CCR Fugitive Dust Control Report
Will County Generating Station
529 East 135th Street/Romeoville, Illinois

basis or more frequently during excessively dry and windy conditions. To minimize fugitive dust emissions from exposed dry bottom ash and slag, fly ash, and other ash related materials, the height of the staged material is minimized, and the material piles are either sprayed with water or covered.

2.6 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 to a licensed landfill.

3.0 Fugitive CCR Dust Assessments

Pursuant to §845.500(b)(3), assessments of the potential fugitive dust emission sources identified in the Will County facility's CCR Fugitive Dust Control Plan (Plan) were 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 Will County facility's CCR Fugitive Dust Control Plan.

No issues were identified during this Annual Report's period of record covering January through December 2022.

Owner Representative/Responsible Person Contact Information:

Mr. Phillip Raush
Station Manager
815-207-5412

4.0 Record of Citizen Complaints

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 Will County station with

Annual CCR Fugitive Dust Control Report
Will County Generating Station
529 East 135th Street/Romeoville, Illinois

regard to fugitive dust emission incidents. In line with established protocols and within 24 hours of 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 were registered during this Annual Report's period of record covering January through December 2022.

5.0 Summary of Corrective Actions Taken

For the January through December 2022 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 undertaken during the past year.

QUARTERLY FUGITIVE DUST
COMPLAINT REPORTS



Midwest Generation, LLC
Will County Generating Station
529 East 135th Street
Romeoville, Illinois 60436

January 11, 2023

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 – Will County Generating Station
Account No. W19781011
Pond IDs: W19781011-01, W19781011-02, W19781011-03, W19781011-04
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 2022 at Will County Generating Station. There were no complaints received from members of the public during the period January 1, 2022 through March 31, 2022.

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

Sincerely,

Phillip Rausch
Plant Manager, Will County Generating Station

This report was signed and submitted to Illinois EPA on April 12, 2022; however a scan of the signed report is not available.



Midwest Generation, LLC
Will County Generating Station
529 East 135th Street
Romeoville, Illinois 60436

July 13, 2022

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 – Will County Generating Station
Account No. W19781011
Pond IDs: W19781011-01, W19781011-02, W19781011-03, W19781011-04
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 2022 at Will County Generating Station. There were no complaints received from members of the public during the period April 1, 2022 through June 30, 2022.

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

Sincerely,

A handwritten signature in black ink, appearing to read "P. Raush".

Phillip Raush
Plant Manager, Will County Generating Station



Midwest Generation, LLC
Will County Generating Station
529 East 135th Street
Romeoville, Illinois 60436

October 12, 2022

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 – Will County Generating Station
Account No. W19781011
Pond IDs: W19781011-01, W19781011-02, W19781011-03, W19781011-04
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 2022 at Will County Generating Station. There were no complaints received from members of the public during the period July 1, 2022 through September 30, 2022.

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

Sincerely,

A handwritten signature in black ink, appearing to read "P. Raush".

Phillip Raush
Plant Manager, Will County Generating Station



Midwest Generation, LLC
Will County Generating Station
529 East 135th Street
Romeoville, Illinois 60436

January 6, 2023

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 – Will County Generating Station
Account No. W19781011
Pond IDs: W19781011-01, W19781011-02, W19781011-03, W19781011-04
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 2022 at Will County Generating Station. There were no complaints received from members of the public during the period October 1, 2022 through December 31, 2022.

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

Sincerely,

A handwritten signature in black ink that reads "P. Raush".

Phillip Raush
Plant Manager, Will County Generating Station

ATTACHMENT B
2022 ANNUAL INSPECTION REPORT

**ANNUAL INSPECTION REPORT
ASH PONDS 1N AND 1S
WILL COUNTY STATION
SEPTEMBER 2022**

This annual inspection report has been prepared pursuant to the coal combustion residuals (CCR) rule codified in Title 35 of the Illinois Administrative Code, Section 845.540(b) for Ash Ponds 1N and 1S at Will County Station in Romeoville, Illinois (Station). The purpose of this project is to perform the annual inspection of Ash Ponds 1N and 1S 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. 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 a qualified person employed by Midwest Generation, LLC.
- CEC performed the annual inspection in accordance with the requirements of Part 845.540 including observations pertaining to the following:
 - Changes in Geometry: Observations of changes in the geometry of Ash Ponds 1N and 1S.
 - Instrumentation: Inspection of the location and type of existing instrumentation and documentation of the maximum recorded readings of each instrument from records provided by Station personnel.
 - Capacity and Impounded Volume: 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.

Ash Ponds 1N and 1S are closed surface impoundments, both less than 2 acres in size. On August 30, 2022, CEC inspected Ash Ponds 1N and 1S and our observations showed no signs of distress that would suggest the stability or operation of the impounding structures are compromised.

1.0 CHANGES IN GEOMETRY

At the time of inspection, Ash Ponds 1N and 1S geometry was observed to be unchanged from previous inspection.

2.0 INSTRUMENTATION

Based on our interview of Station personnel, which was confirmed through our inspection, Ash Ponds 1N and 1S have no instrumentation.

3.0 CAPACITY AND IMPOUNDED VOLUME

Capacity and impounded volume of Ash Ponds 1N and 1S and estimated depth of impounded water and CCR are represented in Table 1 and 2, attached. Volumes and depths were determined through discussion with station personnel and by reviewing inspection reports, construction drawings, and from modeling using existing topographic data.

4.0 STRUCTURAL/OPERATIONAL OBSERVATIONS

Ash Ponds 1N and 1S were inspected for signs of distress that would have the potential to disrupt operation and safety of the basin. Prior to performing the initial inspection, discussions with statement personnel 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

Ash Ponds 1N and 1S 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 Ash Ponds 1N and 1S.

6.0 LIMITATIONS AND CERTIFICATION

This annual CCR annual inspection report 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: Dean Jones

Name: M. Dean Jones, P.E.

Date of Certification: September 30, 2022

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2023

Table 1: Inspection Summary - Ash Pond 1N

Category	Regulation Reference	Evaluation	Recommended Action
Change in Geometry	§845(b)(2)(A)	None	None
Instrumentation	§845(b)(2)(B)	None	None
Water Depth	§845(b)(2)(C)	Less than 1 foot	None
CCR Depth	§845(b)(2)(C)	7 feet	None
Estimated Storage Capacity	§845(b)(2)(D)	11.5 Acre Feet	None
Impounded Water Volume	§845(b)(2)(E)	0.0 Acre Feet	None
Impounded CCR Volume	§845(b)(2)(E)	11.5 Acre Feet	None
Structural/Operational Observations	§845(b)(2)(F)	None	None
Other Changes	§845(b)(2)(G)	None	None

Table 2: Inspection Summary - Ash Pond 1S

Category	Regulation Reference	Evaluation	Recommended Action
Change in Geometry	§845(b)(2)(A)	None	None
Instrumentation	§845(b)(2)(B)	None	None
Water Depth	§845(b)(2)(C)	Less than 1 foot	None
CCR Depth	§845(b)(2)(C)	7 feet	None
Estimated Storage Capacity	§845(b)(2)(D)	10.5 Acre Feet	None
Impounded Water Volume	§845(b)(2)(E)	0.0 Acre Feet	None
Impounded CCR Volume	§845(b)(2)(E)	10.5 Acre Feet	None
Structural/Operational Observations	§845(b)(2)(F)	None	None
Other Changes	§845(b)(2)(G)	None	None

**ANNUAL INSPECTION REPORT
ASH PONDS 2S AND 3S
WILL COUNTY STATION
SEPTEMBER 2022**

This annual inspection report has been prepared pursuant to the coal combustion residuals (CCR) rule codified in Title 35 of the Illinois Administrative Code, Section 845.540(b) for Ash Ponds 2S and 3S at Will County Station in Romeoville, Illinois (Station). The purpose of this project is to perform the annual inspection of Ash Ponds 2S and 3S 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. 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 a qualified person employed by Midwest Generation, LLC.
- CEC performed the annual inspection in accordance with the requirements of Part 845.540 including observations pertaining to the following:
 - Changes in Geometry: Observations of changes in the geometry of Ash Ponds 2S and 3S.
 - Instrumentation: Inspection of the location and type of existing instrumentation and documentation of the maximum recorded readings of each instrument from records provided by Station personnel.
 - Capacity and Impounded Volume: 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.

Ash Ponds 2S and 3S are surface impoundments, both less than 2 acres in size. Pond 2S is an active pond receiving stormwater and intermittent bottom ash from the Unit 4 decommissioning process. At the time of our inspection, Pond 3S was inactive since the mothballing of Unit 3. On August 30, 2022, CEC inspected Ash Ponds 2S and 3S and our observations showed no signs of distress that would suggest the stability or operation of the impounding structures are compromised.

1.0 CHANGES IN GEOMETRY

At the time of inspection, Ash Ponds 2S and 3S geometry was observed to be unchanged from previous inspection.

2.0 INSTRUMENTATION

Based on our interview of Station personnel, which was confirmed through our on-site inspection, Ash Ponds 2S and 3S have no instrumentation.

3.0 CAPACITY AND IMPOUNDED VOLUME

Capacity and impounded volume of Ash Ponds 2S and 3S and estimated depth of impounded water and CCR are represented in Table 1 and 2, attached. Volumes and depths were determined through discussion with station personnel and by reviewing inspection reports, construction drawings, and from modeling using existing topographic data.

4.0 STRUCTURAL/OPERATIONAL OBSERVATIONS

Ash Ponds 2S and 3S were inspected for signs of distress that would have the potential to disrupt operation and safety of the basin. Prior to performing the initial inspection, discussions with station personnel 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

Ash Ponds 2S and 3S 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 Ash Ponds 2S and 3S.

6.0 LIMITATIONS AND CERTIFICATION

This annual CCR inspection report 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: Dean Jones

Name: M. Dean Jones, P.E.

Date of Certification: September 30, 2022

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2023

Table 1: Inspection Summary - Ash Pond 2S

Category	Regulation Reference	Evaluation	Recommended Action
Change in Geometry	§845.450(b)(2)(A)	None	None
Instrumentation	§845.450(b)(2)(B)	None	None
Water Depth	§845.450(b)(2)(C)	1 to 2 feet	None
CCR Depth	§845.450(b)(2)(C)	6 to 7 feet	None
Estimated Storage Capacity	§845.450(b)(2)(D)	10.9 Acre Feet	None
Impounded Water Volume	§845.450(b)(2)(E)	2.0 Acre Feet	None
Impounded CCR Volume	§845.450(b)(2)(E)	8.9 Acre Feet	None
Structural/Operational Observations	§845.450(b)(2)(F)	None	None
Other Changes	§845.450(b)(2)(G)	None	None

Table 2: Inspection Summary - Ash Pond 3S

Category	Regulation Reference	Evaluation	Recommended Action
Change in Geometry	§845.450(b)(2)(A)	None	None
Instrumentation	§845.450(b)(2)(B)	None	None
Water Depth	§845.450(b)(2)(C)	Less than 1 foot	None
CCR Depth	§845.450(b)(2)(C)	7 feet	None
Estimated Storage Capacity	§845.450(b)(2)(D)	12.3 Acre Feet	None
Impounded Water Volume	§845.450(b)(2)(E)	0.0 Acre Feet	None
Impounded CCR Volume	§845.450(b)(2)(E)	12.3 Acre Feet	None
Structural/Operational Observations	§845.450(b)(2)(F)	None	None
Other Changes	§845.450(b)(2)(G)	None	None

ATTACHMENT B.1
2022 ANNUAL HAZARD POTENTIAL
CLASSIFICATION CERTIFICATION

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: Dean Jones

Name: M. Dean Jones, P.E.

Date of Certification: September 30, 2021

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2023

Enclosure: Figure 1 - Site Map

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 J. Dehlin

Date: October 14, 2022

Seal:



th. Dehlin
Thomas Dehlin
2022.10.14
08:18:28-05'00'
License Expires
2023.11.30

ATTACHMENT B.2
2022 ANNUAL STRUCTURAL STABILITY
ASSESSMENT CERTIFICATION

5.0 LIMITATIONS AND CERTIFICATION

This annual Structural Stability and Factor of Safety Assessment report was prepared to meet the requirements of Sections 845.450 and 845.460 of the Illinois Administrative Code draft Title 35 Subtitle G Subchapter 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: Dean Jones

Name: M. Dean Jones, P.E.

Date of Certification: September 30, 2022

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2023

ATTACHMENT B.3
2022 ANNUAL SAFETY FACTOR
ASSESSMENT CERTIFICATION

5.0 LIMITATIONS AND CERTIFICATION

This annual Structural Stability and Factor of Safety Assessment report was prepared to meet the requirements of Sections 845.450 and 845.460 of the Illinois Administrative Code draft Title 35 Subtitle G Subchapter 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: Dean Jones

Name: M. Dean Jones, P.E.

Date of Certification: September 30, 2022

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2023

**ATTACHMENT B.4
2022 ANNUAL INFLOW DESIGN FLOOD
CONTROL SYSTEM PLAN
CERTIFICATION**

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 14, 2022

Seal:



th. Dehlin

Thomas Dehlin
2022.10.14
08:29:18-05'00'
License Expires
2023.11.30

design flood event since the latest hydrologic and hydraulic calculations were prepared in 2021. Therefore, the results and conclusions documented for South Ash Pond 2's and South Ash Pond 3's inflow design flood control systems in the 2021 inflow design flood control system plan remain valid.

Table 5-1 summarizes the results from the hydrologic and hydraulic calculations performed for South Ash Ponds 2 and 3. Based on these results, water entering South Ash Ponds 2 and 3 during the inflow design flood event will not overtop the ponds' dikes. The freeboard in each pond during the design event was estimated to be 0.15 foot. Considering the Station has ceased power generating operations, no longer operates South Ash Pond 2, and is currently re-routing the only wastestream still being managed by South Ash Pond 3, these results are conservative.

Table 5-1 – Summary of Hydrologic & Hydraulic Assessment Results for South Ash Ponds 2 & 3

CCR Surface Impoundment	Illinois Hazard Potential Classification	Inflow Design Flood	Maximum Surface Water Elevation	Pond Crest Elevation
South Ash Pond 2	Class 2	1,000 Year	590.35 feet	590.50 feet
South Ash Pond 3	Class 2	1,000 Year	590.35 feet	590.50 feet

6.0 CONCLUSIONS

Based on the results in Table 5-1, Will County's South Ash Pond 2 and South Ash Pond 3 have adequate hydraulic capacities to retain the 1,000-year flood event without water overtopping the ponds' dikes. Therefore, South Ash Ponds 2 and 3 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 14, 2022

Seal:



Thomas Dehlin
 2022.10.14
 08:20:06-05'00'
 License Expires
 2023.11.30

ATTACHMENT C
2022 ANNUAL GROUNDWATER
MONITORING AND CORRECTIVE ACTION
REPORT



ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

**ILLINOIS CCR COMPLIANCE
ASH PONDS 1 NORTH and 1 SOUTH
ANNUAL GROUNDWATER MONITORING and
CORRECTIVE ACTION REPORT - 2022**

**Midwest Generation, LLC
Will County Station
529 Old Romeo Rd.
Romeoville, Illinois**

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

January 30, 2023

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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), have been completed for the monitoring wells associated with Ash Ponds 1 North (1N) and 1 South (1S) located at the Midwest Generation, LLC (Midwest Generation) Will County Generating Station. The wells sampled were selected to meet the monitoring requirements of the State CCR Rule for the Ash Ponds 1N and 1S. The CCR monitoring well network around Pond 1N consists of five monitoring wells (MW-01, MW-02, MW-07, MW-14 and MW-15) with wells MW-01 and MW-02 being the upgradient monitoring points. The CCR monitoring network around Pond 1S consists also consists of five monitoring wells (MW-03, MW-04, MW-08, MW-09 and MW-13) with monitoring wells MW-03 and MW-04 being upgradient monitoring points. The well locations are shown on Figure 1.

All CCR groundwater monitoring data available to date are provided in Tables 1A and 1B for ponds 1N and 1S, respectively. The turbidity data is provided in Tables 2A and 2B for Ponds 1N and 1S, respectively. Since these two ponds were not regulated under the Federal CCR Rule, additional monitoring wells needed to be installed, and groundwater sampling for establishing statistical background needed to be completed to meet the new State CCR Rule requirements. A variance petition to extend the schedule for submittal of the Application for Initial Operating Permit (Application) for these ponds was filed and granted by the Illinois Pollution Control Board (IPCB). The Application was submitted on March 31, 2022.

This overview of the 2022 groundwater monitoring period 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) – *Proposed* statistical background concentration calculations (see Tables 3 and 4, for Ponds 1N and 1S, respectively) were submitted to the Agency as part of the Application for Initial Operating Permit. This Application is currently still under Agency review. However, assuming that the Agency accepts the proposed background calculations, for the 2022 reporting period, the following constituents with potential statistically significant increases (SSIs) above the *proposed* background concentrations. It is noted that other than those constituents identified in the next main bullet, none of these potential SSI concentrations are above *proposed* site-specific GWPSs. The constituents and associated wells are:

Pond 1N

- Calcium: MW-01 and MW-15 (1st through 4th quarter) and MW-07 and MW-14 (1st and 2nd quarter)
- Chloride: MW-01)2nd quarter) and MW-07, MW-14 and MW-15 (1st through 4th quarters)
- Fluoride: MW-01 and MW-14 (4th quarter) and MW-07 (3rd and 4th quarter)
- pH: MW-02 (1st through 4th quarter). MW-07 (3rd and 4th quarter) and MW-14 (1st, 3rd and 4th quarters)

- Sulfate: MW-02 (1st quarter), MW-14 (4th quarter) and MW-15 (1st through 3rd quarters)
- Total Dissolved Solids (TDS): MW-15 (1st through 3rd quarters)
- Arsenic: MW-02, MW-07, MW-14 and MW-15 (1st through 4th quarters) and MW-01 (4th quarter)
- Barium: MW-14 (1st and 4th quarters) and MW-15 (1st and 2nd quarters)
- Cadmium: MW-01 (2nd through 4th quarters)
- Cobalt: MW-01 (3rd quarter) and MW-15 (1st and 2nd quarters)
- Lead: MW-01 (3rd and 4th quarters) and MW-02 (4th quarter)
- Radium 226/228: MW-02 (4th quarter)

Wells MW-01 and MW-02 are upgradient monitoring points

Pond 1S

- Calcium: MW-13 (2nd quarter)
- Chloride: MW-08, MW-09 and MW-13 (1st through 4th quarters)
- Fluoride: MW-03, MW-04 and MW-13 (4th quarter), MW-08 (1st Through 4th quarters) and MW-09 (2nd through 4th quarters)
- pH: MW-09 (1st through 4th quarters)
- Arsenic: MW-04 (1st quarter) and MW-13 (2nd quarter)
- Barium: MW-13 (2nd quarter)
- Cadmium: MW-08 (3rd quarter) and MW-13 (2nd quarter)
- Chromium: MW-13 (2nd quarter)
- Cobalt: MW-04 (4th quarter) and MW-13 (3rd quarter)
- Lead: MW-03 and MW-09 (4th quarter), MW-08 (1st quarter), and MW-13 (2nd through 4th quarters)
- Molybdenum: MW-08 (2nd through 4th quarters) and MW-09 (1st through 4th quarters)
- Radium 226/228: MW-04 (4th quarter)
- Selenium: MW-03, MW-04 and MW-08 (1st quarter)

Wells MW-03 and MW-04 are upgradient monitoring points.

- Section 845.610(e)(4)(C and D) – Section 845.610(e)(4)(C and D) – *Proposed* GWPSs in accordance with Section 845.600(a)(2) (see Tables 3 and 4 for Ponds 1N and 1S, respectively) were submitted to the Agency as part of the Application for Initial Operating Permit. This Application is currently still under review by the Agency. However, assuming that the Agency accepts the *proposed* GWPSs, for the 2022 reporting period, the following constituents above the *proposed* GWPSs:

Pond 1N

- Calcium: MW-01 and MW-15 (1st through 4th quarter) and MW-07 and MW-14 (1st and 2nd quarter)

- Sulfate: MW-02 (1st quarter), MW-14 (4th quarter) and MW-15 (1st through 3rd quarters)
- Total Dissolved Solids (TDS): MW-15 (1st through 3rd quarters)
- Arsenic: MW-02 (3rd and 4th quarters)

Wells MW-01 and MW-02 are upgradient monitoring points

Pond 1S

- Calcium: MW-13 (2nd quarter)
- Chloride: MW-08 (1st quarter) and MW-09 (1st through 3rd quarters)
- Arsenic: MW-04 (1st quarter) and MW-13 (2nd quarter)
- Cobalt: MW-13 (2nd quarter)
- Lead: MW-13 (2nd quarter)
- Molybdenum: MW-08 (4th quarter)
- Selenium: MW-04 (1st quarter)

Wells MW-03 and MW-04 are upgradient monitoring points.

- Section 845.610(e)(4)(E through H) – Ponds 1N and 1S are currently not in corrective action.

2.0 ANNUAL STATUS SUMMARY

As discussed in Section 1.0, the CCR monitoring well network around Pond 1N consists of five monitoring wells (MW-01, MW-02, MW-07, MW-14 and MW-15) with wells MW-01 and MW-02 being the upgradient monitoring points. The CCR monitoring network around Pond 1S also consists of five monitoring wells (MW-03, MW-04, MW-08, MW-09 and MW-13) with monitoring wells MW-03 and MW-04 being upgradient monitoring points. The well locations are shown on Figure 1. All CCR groundwater monitoring data available to date are provided in Tables 1A and 1B for Ponds 1N and 1S, respectively. The turbidity data is provided in Tables 2A and 2B for Ponds 1N and 1S, respectively. The backup analytical packages have been previously provided as part of the 60-day submittal requirements.

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 2022 reporting period:

- Continued quarter groundwater monitoring. The 60-day data summary submittals for all rounds collected have been placed in the facilities operating record in accordance with Section 845.610(b)(3)(D).
- Submittal of the Application for Initial Operating Permit for Ponds 1N and 1S on March 31, 2022.

Key activities for the upcoming year include:

- Submittal of an Application for Initial Construction Permit – Will County Generating Station which will include public input from pre-submittal required public meetings.
- Receipt of an approved Application for Initial Operating permit which will facilitate finalization of the proposed statistical background concentrations and the proposed site-specific GWPSs. Once these are accepted/finalized by the Agency, formal groundwater data comparisons and evaluations can be made based on quarterly monitoring results relative to these comparison criteria.
- Continued quarterly groundwater monitoring/reporting.

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 for the most recent round of groundwater sampling (4th quarter 2022) is provided on Figure 2.

There were no monitoring wells installed or decommissioned during this reporting period.

Water levels were recorded from the specified CCR monitoring wells are summarized in Table 5. Potentiometric surface maps for each round of available water levels are provided in Attachment 1. Groundwater flow beneath Ash Ponds 1N and 1S is consistently in a westerly direction. 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 for each CCR monitoring well along with sample dates is provided in Table 7.

Proposed statistical background concentration calculations (see Tables 3 and 4) were submitted to the Agency as part of the Application for Initial Operating Permit. This Application is currently still under Agency review. However, assuming that the Agency accepts the *proposed* background calculations, the groundwater monitoring over the 2022 reporting period has identified the following constituents with potential statistically significant increases (SSIs) above the *proposed* background concentrations:

Pond 1N

- Calcium: MW-01 and MW-15 (1st through 4th quarter) and MW-07 and MW-14 (1st and 2nd quarter)
- Chloride: MW-01 (2nd quarter) and MW-07, MW-14 and MW-15 (1st through 4th quarters)

- Fluoride: MW-01 and MW-14 (4th quarter) and MW-07 (3rd and 4th quarter)
- pH: MW-02 (1st through 4th quarter). MW-07 (3rd and 4th quarter) and MW-14 (1st, 3rd and 4th quarters)
- Sulfate: MW-02 (1st quarter), MW-14 (4th quarter) and MW-15 (1st through 3rd quarters)
- Total Dissolved Solids (TDS): MW-15 (1st through 3rd quarters)
- Arsenic: MW-02, MW-07, MW-14 and MW-15 (1st through 4th quarters) and MW-01 (4th quarter)
- Barium: MW-14 (1st and 4th quarters) and MW-15 (1st and 2nd quarters)
- Cadmium: MW-01 (2nd through 4th quarters)
- Cobalt: MW-01 (3rd quarter) and MW-15 1st and 2nd quarters)
- Lead: MW-01 (3rd and 4th quarters) and MW-02 (4th quarter)
- Radium 226/228: MW-02 (4th quarter)

Wells MW-01 and MW-02 are upgradient monitoring points

Pond 1S

- Calcium: MW-13 (2nd quarter)
- Chloride: MW-08, MW-09 and MW-13 (1st through 4th quarters)
- Fluoride: MW-03, MW-04 and MW-13 (4th quarter), MW-08 (1st Through 4th quarters) and MW-09 (2nd through 4th quarters)
- pH: MW-09 (1st through 4th quarters)
- Arsenic: MW-04 (1st quarter) and MW-13 (2nd quarter)
- Barium: MW-13 (2nd quarter)
- Cadmium: MW-08 (3rd quarter) and MW-13 (2nd quarter)
- Chromium: MW-13 (2nd quarter)
- Cobalt: MW-04 (4th quarter) and MW-13 (3rd quarter)
- Lead: MW-03 and MW-09 (4th quarter), MW-08 (1st quarter), and MW-13 (2nd through 4th quarters)
- Molybdenum: MW-08 (2nd through 4th quarters) and MW-09 (1st through 4th quarters)
- Radium 226/228: MW-04 (4th quarter)
- Selenium: MW-03, MW-04 and MW-08 (1st quarter)

Wells MW-03 and MW-04 are upgradient monitoring points. As previously stated, other than those constituents identified in the second bullet in Section 1, none of these potential SSI concentrations are above *proposed* site-specific GWPSs.

TABLES

Table 1A. Groundwater Analytical Results-Midwest Generation, LLC, Will County Station, Romeoville, IL, Pond 1N.

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 Combined	Selenium	Thallium
MW-01 up gradient	5/3/2021	2.6	170	F1 21	0.62	6.83	390	1200	< 0.003	< 0.001	0.095	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.034	< 0.0002	0.012	0.623	0.0093	< 0.002
	5/24/2021	2.5	200	18	0.63	6.86	350	1100	< 0.003	< 0.001	0.093	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.036	< 0.0002	F1 < 0.012	0.953	0.012	< 0.002
	6/7/2021	3.0	200	18	0.63	6.52	380	510	< 0.003	< 0.001	0.096	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.037	< 0.0002	0.013	< 0.372	0.01	< 0.002
	6/25/2021	B 2.6	200	20	0.59	6.64	410	1200	^+ < 0.003	< 0.001	0.097	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.037	< 0.0002	0.014	0.672	0.0042	< 0.002
	7/12/2021	2.4	190	16	0.60	6.55	320	1000	< 0.003	0.0012	0.100	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.045	< 0.0002	0.013	0.457	0.012	< 0.002
	8/2/2021	2.4	200	18	0.65	6.57	410	1300	< 0.003	0.001	0.100	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.044	< 0.0002	0.014	0.478	0.0095	< 0.002
	8/23/2021	2.4	200	18	0.61	6.99	400	1100	< 0.003	< 0.001	0.100	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.044	< 0.0002	0.014	0.697	0.0058	< 0.002
	11/19/2021	2	170	29	0.56	6.62	260	970	< 0.003	< 0.001	0.090	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.038	< 0.0002	0.0098	1.16	0.017	< 0.002
	2/21/2022	2	190	26	0.55	6.63	370	1200	< 0.003	< 0.001	0.086	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.032	< 0.0002	0.011	0.773	0.0079	< 0.002
	6/15/2022	2.6	180	33	0.61	6.43	350	1100	< 0.003	< 0.001	0.09	< 0.001	0.00054	< 0.005	< 0.001	< 0.0005	0.033	< 0.0002	0.015	0.945	0.0087	< 0.002
	8/24/2022	2.7	180	24	0.61	6.51	370	1400	< 0.003	< 0.001	0.093	< 0.001	^1+ 0.00092	< 0.005	0.0016	0.00078	0.038	< 0.0002	0.015	0.581	0.0047	< 0.002
11/15/2022	2.9	190	22	1	6.59	360	1100	< 0.003	0.0011	0.097	< ^+ 0.001	0.00052	< 0.005	0.001	0.00057	0.039	< 0.0002	0.014	< 0.63	0.0085	< 0.002	
MW-02 up gradient	5/3/2021	5.3	87	28	0.41	7.76	500	1100	< 0.003	0.009	0.058	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.046	< 0.0002	0.072	1.3	< 0.0025	< 0.002
	5/24/2021	5.2	88	24	0.41	7.77	550	1100	< 0.003	0.0099	0.059	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.047	< 0.0002	0.07	1.19	< 0.0025	< 0.002
	6/7/2021	6.5	100	25	0.4	7.60	540	1100	< 0.003	0.011	0.057	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.045	< 0.0002	0.081	0.54	< 0.0025	< 0.002
	6/28/2021	B 5.3	95	23	0.36	7.93	500	1200	^+ < 0.003	0.012	0.059	< 0.001	< 0.0005	0.0057	< 0.001	< 0.0005	0.046	< 0.0002	0.075	0.8	< 0.0025	< 0.002
	7/12/2021	5.2	97	21	0.37	7.53	480	970	< 0.003	0.012	0.067	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.051	< 0.0002	0.071	1.07	< 0.0025	< 0.002
	8/2/2021	4.8	92	24	0.37	7.54	520	1200	< 0.003	0.011	0.06	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.048	< 0.0002	0.073	0.798	< 0.0025	< 0.002
	8/23/2021	5.0	92	26	0.38	8.02	530	830	< 0.003	0.011	0.06	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.048	< 0.0002	0.075	0.986	< 0.0025	< 0.002
	11/19/2021	5.2	86	27	0.38	7.72	520	1100	< 0.003	0.014	0.057	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.041	< 0.0002	0.068	1.43	< 0.0025	< 0.002
	2/21/2022	4.9	92	32	0.43	7.65	550	1100	< 0.003	0.01	0.06	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.044	< 0.0002	0.083	< 0.848	< 0.0025	< 0.002
	6/15/2022	5.3	91	30	0.39	7.32	460	1100	< 0.003	0.01	0.058	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.044	< 0.0002	0.073	1.17	< 0.0025	< 0.002
	8/24/2022	5.6	81	28	0.38	7.73	480	1100	< 0.003	0.015	0.059	< 0.001	< ^1+ 0.0005	< 0.005	< 0.001	< 0.0005	0.043	< 0.0002	0.07	0.984	< 0.0025	< 0.002
11/15/2022	6.5	99	27	0.64	7.64	530	1000	< 0.003	0.017	0.069	< ^+ 0.001	< 0.0005	< 0.005	< 0.001	0.00052	0.047	< 0.0002	0.076	2.13	< 0.0025	< 0.002	
MW-07 down gradient	5/4/2021	4.0	130	110	0.69	8.29	490	1000	< 0.003	0.0022	0.063	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.026	< 0.0002	0.051	0.952	< 0.0025	< 0.002
	5/24/2021	4.2	150	140	0.53	8.38	590	1400	< 0.003	0.0022	0.064	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.028	< 0.0002	0.049	1.28	< 0.0025	< 0.0025
	6/7/2021	4.0	110	120	0.69	7.62	480	1000	< 0.003	0.0026	0.064	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.022	< 0.0002	0.07	1.25	< 0.0025	< 0.002
	6/25/2021	B 4.0	290	250	0.42	6.35	850	2300	^+ < 0.003	0.0024	0.12	< 0.001	< 0.0005	0.034	0.0012	< 0.0005	0.032	< 0.0002	0.051	0.694	0.0039	< 0.002
	7/12/2021	4.6	230	170	0.65	6.87	510	1400	< 0.003	0.0044	0.063	^+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.039	< 0.0002	0.05	1.4	0.0031	< 0.002
	8/2/2021	3.1	120	130	0.69	7.97	450	980	< 0.003	0.0036	0.071	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.024	< 0.0002	0.068	1.07	< 0.0025	< 0.002
	8/25/2021	2.8	80	130	0.73	8.63	420	800	< 0.003	0.0027	0.059	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.019	< 0.0002	0.076	1.21	< 0.0025	< 0.002
	11/19/2021	3.9	170	190	0.48	6.62	680	1800	< 0.003	0.0065	0.048	^+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.023	< 0.0002	0.033	2.4	< 0.0025	< 0.002
	2/22/2022	2.6	160	130	0.42	6.50	290	1200	< 0.003	0.0012	0.059	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.022	< 0.0002	0.016	< 0.529	< 0.0025	< 0.002
	6/15/2022	4.4	150	120	0.68	7.24	520	1100	< 0.003	0.0045	0.075	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.023	< 0.0002	0.056	1.3	< 0.0025	< 0.002
	8/25/2022	2.9	65	130	0.75	7.90	450	1100	< 0.003	0.0035	0.052	< 0.001	< ^1+ 0.0005	< 0.005	< 0.001	< 0.0005	0.016	< 0.0002	0.073	0.944	< 0.0025	< 0.002
11/15/2022	3	59	140	1	8.01	440	1000	< 0.003	0.0032	0.044	< ^+ 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.017	< 0.0002	0.087	1.29	< 0.0025	< 0.002	
MW-14 down gradient	5/4/2021	4.8	130	110	0.44	8.03	490	1100	< 0.003	0.0035	0.097	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.046	< 0.0002	0.053	< 0.453	< 0.0025	< 0.002
	5/25/2021	5.1	140	110	0.42	7.94	550	1300	< 0.003	0.0038	0.082	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.051	< 0.0002	0.052	0.736	< 0.0025	< 0.002
	6/7/2021	5.7	150	110	0.47	7.53	530	1200	< 0.003	0.0047	0.13	< 0.001	< 0.0005	< 0.005	< 0.001	0.00062	0.05	< 0.0002	0.054	< 0.368	< 0.0025	< 0.002
	6/28/2021	B 3.1	87	120	0.74	8.17	400	990	^+ < 0.003	0.0028	0.086	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.021	< 0.0002	0.081	1.07	< 0.0025	< 0.002
	7/12/2021	5.2	130	92	0.46	7.67	470	1100	< 0.003	0.0061	0.094	^+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.058	< 0.0002	0.049	1.07	< 0.0025	< 0.002
	8/2/2021	4.7	120	88	0.47	7.75	470	1100	< 0.003	0.0064	0.24	< 0.001	< 0.0005	< 0.005	< 0.001	0.0016	0.052	< 0.0002	0.051	1.25	< 0.0025	< 0.002
	8/25/2021	4.1	96	92	0.58	8.21	440	930	< 0.003	0.0047	0.14	< 0.001	< 0.0005	< 0.005	< 0.001	0.00054	0.037	< 0.0002	0.064	1.43	< 0.0025	< 0.002
	11/23/2021	3.0	81	120	0.6	7.90	460	1000	< 0.003	0.0023	0.051	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.02	< 0.0002	0.049	1.21	< 0.0025	< 0.002
	2/23/2022	3.8	110	110																		

Table 1B. Groundwater Analytical Results-Midwest Generation, LLC, Will County Station, Romeoville, IL, Pond 1S.

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 Combined	Selenium	Thallium
MW-03 up gradient	5/3/2021	3.3	140	18	0.31	6.90	240	890	< 0.003	0.0011	0.11	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.04	< 0.0002	0.017	0.993	< 0.0025	< 0.002
	5/24/2021	3.2	120	19	0.34	6.91	270	900	< 0.003	0.001	0.001	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.038	< 0.0002	0.018	0.922	0.0057	< 0.002
	6/8/2021	3.7	140	21	0.32	6.75	290	940	< 0.003	0.0014	0.1	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.041	< 0.0002	0.017	0.857	< 0.0025	< 0.002
	6/28/2021	B 3.6	120	23	0.32	7.17	290	930	^+ < 0.003	0.0023	0.091	< 0.001	< 0.0005	< 0.005	0.001	< 0.0005	0.044	< 0.0002	0.022	1.03	< 0.0025	< 0.002
	7/12/2021	3.8	120	27	0.33	6.88	270	870	< 0.003	0.0033	0.1	< 0.001	0.00053	< 0.005	< 0.001	< 0.0005	0.048	< 0.0002	0.028	1.97	< 0.0025	< 0.002
	8/2/2021	6.2	120	31	0.3	6.86	280	920	< 0.003	0.0053	0.096	< 0.001	< 0.0005	< 0.005	0.001	< 0.0005	0.043	< 0.0002	0.021	1.16	< 0.0025	< 0.002
	8/24/2021	3.3	120	F1 F2 50	0.35	7.28	300	890	< 0.003	0.0021	0.091	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.042	< 0.0002	0.022	0.763	< 0.0025	< 0.002
	11/19/2021	3.7	160	27	0.32	6.67	330	970	< 0.003	0.0016	0.12	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.039	< 0.0002	0.025	2.47	0.0082	< 0.002
	2/24/2022	2.6	220	18	0.3	6.53	360	1200	< 0.003	0.0015	0.12	< ^1+ 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.032	< 0.0002	0.014	1.11	0.046	< 0.002
	6/16/2022	4	140	18	0.31	6.62	300	910	< 0.003	0.0014	0.1	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.045	< 0.0002	0.022	1.38	< 0.0025	< 0.002
8/24/2022	3.4	140	35	0.34	6.73	360	1200	< 0.003	< 0.001	0.096	< 0.001	< ^1+ 0.0005	< 0.005	0.001	< 0.0005	0.035	< 0.0002	0.018	1.24	< 0.0025	< 0.002	
11/15/2022	3.5	140	43	0.64 F1	6.79	360	990	< 0.003	0.0039	0.095	< ^+ 0.001	< 0.0005	< 0.005	0.0012	0.00063	0.037	< 0.0002	0.021	1.78	< 0.0025	< 0.002	
MW-04 up gradient	5/3/2021	5.1	310	28	0.36	6.76	910	2000	< 0.003	0.003	0.046	< 0.001	< 0.0005	< 0.005	0.0019	< 0.0005	0.026	< 0.0002	0.026	1.16	< 0.0025	< 0.002
	5/24/2021	5.5	340	24	0.38	6.90	950	2000	< 0.003	0.0039	0.047	^1+ < 0.001	< 0.0005	< 0.005	0.0016	< 0.0005	0.027	< 0.0002	0.028	1.72	0.0051	< 0.002
	6/8/2021	5.7	310	24	0.37	6.58	910	2000	< 0.003	0.0026	0.043	< 0.001	< 0.0005	< 0.005	0.0016	< 0.0005	0.027	< 0.0002	0.028	< 0.459	0.0076	< 0.002
	6/28/2021	B 5.6	330	20	0.35	6.95	930	2100	^+ < 0.003	0.011	0.047	< 0.001	< 0.0005	< 0.005	0.0016	< 0.0005	0.025	< 0.0002	0.027	1.12	0.019	< 0.002
	7/12/2021	5.9	320	16	0.38	6.70	970	2100	< 0.003	0.01	0.049	< 0.001	< 0.0005	< 0.005	0.0016	< 0.0005	0.03	< 0.0002	0.033	1.68	0.0056	< 0.002
	8/2/2021	5.3	310	21	0.38	6.71	1000	2200	< 0.003	0.0039	0.046	< 0.001	< 0.0005	< 0.005	0.0018	< 0.0005	0.027	< 0.0002	0.032	1.18	< 0.0025	< 0.002
	8/24/2021	6.2	320	90	0.40	7.09	1100	1700	< 0.003	0.0075	0.046	< 0.001	< 0.0005	< 0.005	0.002	< 0.0005	0.028	< 0.0002	0.035	< 0.642	< 0.0025	< 0.002
	11/19/2021	6.1	300	23	0.36	6.69	840	1900	< 0.003	0.0063	0.044	^1+ < 0.001	< 0.0005	< 0.005	0.0022	< 0.0005	0.022	< 0.0002	0.023	1.17	< 0.0025	< 0.002
	2/24/2022	4.7	350	16	0.37	6.5	950	2100	< 0.003	0.02	0.039	< ^1+ 0.001	< 0.0005	< 0.005	0.0017	< 0.0005	0.02	< 0.0002	0.028	< 0.424	0.09	< 0.002
	6/16/2022	5.5	310	22	0.37	6.55	990	2200	< 0.003	0.003	0.045	< 0.001	< 0.0005	< 0.005	0.0021	< 0.0005	0.023	< 0.0002	0.026	1.39	0.0044	< 0.002
8/24/2022	5.8	280	18	0.40	6.57	810	2000	< 0.003	0.0053	0.044	< 0.001	< ^1+ 0.0005	< 0.005	0.003	< 0.0005	0.019	< 0.0002	0.021	1.41	0.003	< 0.002	
11/15/2022	5.6	290	19	0.64	6.64	770	1700	< 0.003	0.011	0.047	< ^+ 0.001	< 0.0005	< 0.005	0.0032	< 0.0005	0.02	< 0.0002	0.021	4.15	0.0061	< 0.002	
MW-08 down gradient	5/4/2021	2.6	190	290	0.51	6.95	490	1900	< 0.003	0.0073	0.081	< 0.001	< 0.0005	< 0.005	0.0015	< 0.0005	0.015	< 0.0002	0.047	0.873	< 0.0025	< 0.002
	5/25/2021	2.8	170	290	0.51	6.90	540	1600	< 0.003	0.0074	0.083	^1+ < 0.001	< 0.0005	< 0.005	0.001	< 0.0005	0.016	< 0.0002	0.044	1.06	< 0.0025	< 0.002
	6/7/2021	4.2	170	120	0.59	7.24	650	1400	< 0.003	0.01	0.067	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.021	< 0.0002	0.091	0.768	< 0.0025	< 0.002
	6/28/2021	B 3.0	160	190	0.53	7.17	480	1400	^+ < 0.003	0.014	0.083	< 0.001	< 0.0005	< 0.005	< 0.001	0.0011	0.019	< 0.0002	0.066	0.621	< 0.0025	< 0.002
	7/12/2021	7.0	200	260	0.5	6.64	530	1600	< 0.003	0.013	0.17	^+ < 0.001	< 0.0005	< 0.005	0.0012	< 0.0005	0.022	< 0.0002	0.07	0.841	< 0.0025	< 0.002
	8/2/2021	3.1	160	180	0.53	6.87	530	1400	< 0.003	0.012	0.074	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.021	< 0.0002	0.076	0.533	< 0.0025	< 0.002
	8/25/2021	3.0	130	150	0.61	7.45	500	1100	< 0.003	0.011	0.068	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.021	< 0.0002	0.084	0.888	< 0.0025	< 0.002
	11/19/2021	3.3	200	310	0.5	6.66	630	1900	< 0.003	0.0094	0.065	^1+ < 0.001	< 0.0005	< 0.005	0.0014	< 0.0005	0.013	< 0.0002	0.043	1.69	< 0.0025	< 0.002
	2/24/2022	1.6	170	210	0.52	6.84	270	1200	< 0.003	0.006	0.061	< ^1+ 0.001	< 0.0005	< 0.005	< 0.001	0.00068	0.0088	< 0.0002	0.026	< 0.645	0.048	< 0.002
	6/15/2022	2.9	150	170	0.59	6.66	480	1300	< 0.003	0.0048	0.075	< 0.001	< 0.0005	< 0.005	0.0016	< 0.0005	0.014	< 0.0002	0.064	1.39	< 0.0025	< 0.002
8/25/2022	3.0	120	140	0.75	6.95	480	1200	< 0.003	0.0062	0.059	< 0.001	^1+ 0.0012	< 0.005	< 0.001	< 0.0005	0.019	< 0.0002	0.085	1.23	< 0.0025	< 0.002	
11/17/2022	3.5	110	120	0.63	7.19	500	1100	< 0.003	0.014	0.061	< ^+ 0.001	< 0.0005	< 0.005	0.0016	< 0.0005	0.021	< 0.0002	0.11	1.2	< 0.0025	< 0.002	
MW-09 down gradient	11/11/2015	1.9	56	190	0.55	9.12	460	750	< 0.003	0.0047	0.027	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.001	< 0.0002	0.14	< 0.2208	< 0.0025	< 0.002
	2/17/2016	1.8	47	160	0.55	9.10	250	600	< 0.003	0.0051	0.027	^+ < 0.001	< 0.0005	< 0.005	< 0.001	0.00065	< 0.01	< 0.0002	0.089	< 0.373	< 0.0025	< 0.002
	5/24/2016	1.6	48	180	0.51	8.79	240	640	< 0.003	0.0043	0.027	^+ < 0.001	< 0.0005	< 0.005	< 0.001	0.00071	< 0.01	< 0.0002	0.079	0.508	< 0.0025	< 0.002
	8/9/2016	2.2	53	140	0.48	8.35	280	750	< 0.003	0.0052	0.031	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.14	0.639	< 0.0025	< 0.002
	10/26/2016	2.2	33	130	0.81	9.16	230	660	< 0.003	0.0069	0.019	< 0.001	< 0.0005	< 0.005	< 0.0010	< 0.0005	< 0.01	< 0.0002	0.11	0.608	< 0.0025	< 0.002
	1/31/2017	2.0	61	250	0.57	8.59	180	710	< 0.003	0.0063	0.038	* < 0.001	< 0.0005	< 0.005	< 0.0010	0.0014	< 0.01	^+ < 0.0002	0.09	< 0.45	< 0.0025	< 0.002
	5/9/2017	1.8	66	340	0.38	8.58	250	900	< 0.003	0.0052	0.038	< 0.001	< 0.0005	< 0.005	< 0.0010	0.00054	< 0.01	< 0.0002	0.093	< 0.361	< 0.0025	< 0.002
	6/27/2017	1.9	64	330	0.51	7.76	240	940	< 0.003	0.0046	0.039	< 0.001	< 0.0005	< 0.005	< 0.0010	< 0.0005	< 0.01	< 0.0002	0.091	< 0.638	< 0.0025	< 0.002
	9/6/2017	1.8	59	310	0.51																	

Table 2A. Groundwater Turbidity - Pond 1N, Midwest Generation, LLC, Will County Generating Station, Romeoville, IL.

Well ID	Date	Turbidity (NTU)
MW-01	2/23/2021	0.64
	4/10/2021	5.81
	4/25/2021	7.69
	5/3/2021	1.74
	5/24/2021	1.83
	6/7/2021	2.32
	6/25/2021	3.50
	7/12/2021	4.18
	8/2/2021	2.87
	8/23/2021	1.17
	9/24/2021	3.25
	11/19/2021	16.82
	2/21/2022	3.04
MW-02	6/15/2022	10.56
	8/24/2022	15.3
	11/15/2022	19.8
	2/25/2021	8.84
	4/10/2021	9.17
	4/25/2021	12.03
	5/3/2021	2.42
	5/24/2021	2.7
	6/7/2021	1.82
	6/28/2021	3.15
	7/12/2021	4.23
	8/2/2021	3.11
	8/23/2021	1.37
9/24/2021	4.63	
11/19/2021	2.1	
2/21/2022	0.45	
6/15/2022	2.69	
8/24/2022	8.71	
11/15/2022	8.21	
MW-07	3/1/2021	6.11
	4/10/2021	6.19
	4/25/2021	6.98
	5/4/2021	37.65
	5/24/2021	2.54
	6/7/2021	6.21
	6/25/2021	6.02
	7/12/2021	5.13
	8/2/2021	2.45
	8/25/2021	7.7
	9/24/2021	4.13
	11/19/2021	7.35
	2/22/2022	-0.02
6/15/2022	5.58	
8/25/2022	2.27	
11/15/2022	41.3	
MW-14	5/4/2021	6.88
	5/25/2021	3.5
	6/7/2021	2.55
	6/28/2021	7.44
	7/12/2021	4.89
	8/2/2021	9.8
	8/25/2021	11.7
	9/24/2021	6.87
	11/19/2021	5.19
	2/23/2022	45.11
	6/14/2022	3.98
MW-15	8/23/2022	2.71
	11/17/2022	2.8
	5/4/2021	28.65
	5/25/2021	8.89
	6/7/2021	8.82
	6/28/2021	6.48
	7/12/2021	8.52
	8/2/2021	22.71
	8/25/2021	12.4
	9/24/2021	11.44
11/19/2021	10.83	
2/22/2022	17.05	
6/14/2022	11.83	
8/23/2022	33.2	
11/17/2022	148.2	

Table 2B. Groundwater Turbidity - Pond 1S, Midwest Generation, LLC, Will County Generating Station, Romeoville, IL.

Well ID	Date	Turbidity (NTU)
MW-03	3/1/2021	0.0
	4/10/2021	1.45
	4/25/2021	3.41
	5/3/2021	1.61
	5/24/2021	2.06
	6/8/2021	2.34
	6/28/2021	2.69
	7/12/2021	4.07
	8/2/2021	1.98
	8/24/2021	5.1
	9/24/2021	4.18
	11/19/2021	0.47
	2/24/2022	-1.1
6/16/2022	1.7	
8/24/2022	6.4	
11/15/2022	9.71	
MW-04	2/22/2021	9.87
	4/10/2021	42.2
	4/25/2021	7.41
	5/3/2021	4.2
	5/24/2021	4.45
	6/8/2021	2.8
	6/28/2021	12.93
	7/12/2021	3.93
	8/2/2021	3.75
	8/24/2021	10.1
	9/24/2021	5.74
	11/19/2021	15.15
	2/24/2022	2.04
6/16/2022	3.13	
8/24/2022	4.7	
11/15/2022	14.2	
MW-08	3/1/2021	2.3
	4/10/2021	270.98
	4/25/2021	26.73
	5/4/2021	6.6
	5/28/2021	6.51
	6/7/2021	4.58
	6/28/2021	5.67
	7/12/2021	6.71
	8/2/2021	14.15
	8/25/2021	8.9
	9/24/2021	7.21
	11/19/2021	2.34
	2/24/2022	40.05
6/15/2022	5.01	
8/25/2022	9.02	
11/17/2022	13.9	
MW-09	3/1/2021	0.86
	4/10/2021	6.91
	4/25/2021	2.08
	5/25/2021	14.12
	6/11/2021	2.39
	6/29/2021	2.97
	7/12/2021	3.94
	8/4/2021	0.0
	8/25/2021	19.9
	9/24/2021	3.67
	11/23/2021	19.07
	2/22/2022	0.59
	6/15/2022	113.77
8/25/2022	1.93	
11/16/2022	11.73	
MW-13	5/4/2021	20.6
	5/25/2021	9.8
	6/7/2021	6.49
	6/28/2021	8.25
	7/12/2021	5.89
	8/2/2021	2.91
	8/26/2021	12.9
	9/24/2021	9.13
	11/23/2021	17.83
	2/23/2022	34.33
	6/14/2022	81.91
8/23/2022	47.3	
11/16/2022	77.2	

Table 3. Proposed Site-Specific Groundwater Protection Standards - Will County Station Pond 1N.

Upgradient Well(s)	Parameter	Section 845.600 Standards	Interwell Background Prediction Limit	Proposed GWPS
Well MW-01/MW-02 Pooled	Antimony	0.006	0.003	0.006
Well MW-01	Arsenic	0.01	0.001	0.01
Well MW-01	Barium	2.0	0.109	2.0
Wells MW-01/MW-02 Pooled	Beryllium	0.004	0.001	0.004
Well MW-02	Boron	2.0	6.50	6.50
Wells MW-01/MW-02 Pooled	Cadmium	0.005	0.0005	0.005
Well MW-02	Chloride	200	32.6	200
Wells MW-01/MW-02 Pooled	Chromium	0.1	0.0057	0.1
Wells MW-01/MW-02 Pooled	Cobalt	0.006	0.001	0.006
Well MW-02	Combined Radium 226 + 228 (pCi/L)	5.0	2.036	5.0
Well MW-01	Fluoride	4.0	0.708	4.0
Wells MW-01/MW-02 Pooled	Lead	0.0075	0.0005	0.0075
Well MW-02	Lithium	0.04	0.056	0.056
Wells MW-01/MW-02 Pooled	Mercury	0.002	0.0002	0.002
Well MW-02	Molybdenum	0.10	0.087	0.10
Well MW-01	pH (standard units)	6.5-9.0	6.1 - 7.3	6.1-9.0
Well MW-01	Selenium	0.05	0.024	0.050
Well MW-01	Sulfate	400	547.6	547.6
Wells MW-01/MW-02 Pooled	Thallium	0.002	0.002	0.002
Well MW-02	Total Dissolved Solids	1200	1499	1499
Well MW-02	Calcium	NE	109.5	109.5
Wells MW-01/MW-02 Pooled	Turbidity (NTU)	NE	16.22	16.22

All values are in mg/L (ppm) unless otherwise noted.

NE - Not Established

Bold - Proposed Site-specific Groundwater Protection Standard based on Section 845.600(a)(2)

Table 4. Proposed Site-Specific Groundwater Protection Standards - Will County Station Pond 1S.

Upgradient Well(s)	Parameter	Section 845.600 Standards	Interwell Background Prediction Limit	Proposed GWPS
Wells MW-03/MW-04 Pooled	Antimony	0.006	0.003	0.006
Well MW-04	Arsenic	0.01	0.017	0.017
Well MW-03	Barium	2.0	0.138	2.0
Wells MW-03/MW-04 Pooled	Beryllium	0.004	0.001	0.004
Well MW-04	Boron	2.0	6.97	6.97
Wells MW-03/MW-04 Pooled	Cadmium	0.005	0.0005	0.005
Wells MW-03/MW-04 Pooled	Chloride	200	90.0	200
Wells MW-03/MW-04 Pooled	Chromium	0.1	0.005	0.1
Well MW-04	Cobalt	0.006	0.003	0.006
Wells MW-03/MW-04 Pooled	Combined Radium 226 + 228 (pCi/L)	5.0	2.742	5.0
Well MW-04	Fluoride	4.0	0.427	4.0
Wells MW-03/MW-04 Pooled	Lead	0.0075	0.0005	0.0075
Well MW-03	Lithium	0.04	0.053	0.053
Wells MW-03/MW-04 Pooled	Mercury	0.002	0.0002	0.002
Well MW-04	Molybdenum	0.10	0.043	0.10
Wells MW-03/MW-04 Pooled	pH (standard units)	6.5-9.0	6.36-7.37	6.36-9.0
Wells MW-03/MW-04 Pooled	Selenium	0.05	0.019	0.050
Well MW-04	Sulfate	400	1217.0	1217.0
Wells MW-03/MW-04 Pooled	Thallium	0.002	0.002	0.002
Well MW-04	Total Dissolved Solids	1200	2524	2524
Well MW-04	Calcium	NE	362.0	362.0
Well MW-04	Turbidity (NTU)	NE	66.09	66.09

All values are in mg/L (ppm) unless otherwise noted.

NE - Not Established

Bold - Proposed Site-specific Groundwater Protection Standard based on Section 845.600(a)(2)

Table 5. Groundwater Elevations - Midwest Generation, LLC, Will County Station Ponds 1N-1S, Romeoville, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TOC)	Groundwater Elevation (ft above MSL)
MW-01	5/24/2021	592.95	10.30	582.65
	6/7/2021	592.95	10.50	582.45
	7/12/2021	592.95	10.12	582.83
	8/23/2021	592.95	11.11	581.84
	11/19/2021	592.95	10.49	582.46
	1/19/2022	592.95	10.83	582.12
	2/10/2022	592.95	10.83	582.12
	3/14/2022	592.95	9.98	582.97
	4/6/2022	592.95	9.58	583.37
	5/23/2022	592.95	10.14	582.81
	6/29/2022	592.95	10.70	582.25
	7/19/2022	592.95	10.63	582.32
	8/23/2022	592.95	10.59	582.36
	9/20/2022	592.95	10.42	582.53
MW-02	10/13/2022	592.95	11.04	581.91
	11/15/2022	592.95	10.87	582.08
	12/19/2022	592.95	10.37	582.58
	5/24/2021	594.00	11.49	582.51
	6/7/2021	594.00	11.70	582.30
	7/12/2021	594.00	11.30	582.70
	8/23/2021	594.00	12.25	581.75
	11/19/2021	594.00	11.80	582.20
	1/19/2022	594.00	11.84	582.16
	2/10/2022	594.00	12.01	581.99
	3/14/2022	594.00	11.17	582.83
	4/6/2022	594.00	10.57	583.43
	5/23/2022	594.00	11.20	582.80
	6/29/2022	594.00	11.86	582.14
7/19/2022	594.00	11.80	582.20	
8/23/2022	594.00	11.72	582.28	
9/20/2022	594.00	11.58	582.42	
10/13/2022	594.00	12.18	581.82	
11/15/2022	594.00	12.07	581.93	
12/19/2022	594.00	11.47	582.53	
MW-03	5/25/2021	593.51	10.82	582.69
	6/7/2021	593.51	11.23	582.28
	7/12/2021	593.51	10.70	582.81
	8/23/2021	593.51	12.15	581.36
	11/19/2021	593.51	10.92	582.59
	1/19/2022	593.51	11.09	582.42
	2/10/2022	593.51	11.50	582.01
	3/14/2022	593.51	10.49	583.02
	4/6/2022	593.51	10.13	583.38
	5/23/2022	593.51	10.68	582.83
	6/29/2022	593.51	11.81	581.70
	8/23/2022	593.51	11.74	581.77
	9/20/2022	593.51	11.46	582.05
	10/13/2022	593.51	12.15	581.36
11/15/2022	593.51	11.83	581.68	
12/19/2022	593.51	10.94	582.57	
MW-04	5/24/2021	593.93	11.28	582.65
	6/7/2021	593.93	11.55	582.38
	7/12/2021	593.93	11.20	582.73
	8/23/2021	593.93	11.40	582.53
	11/19/2021	593.93	11.36	582.57
	1/19/2022	593.93	11.62	582.31
	2/10/2022	593.93	12.30	581.63
	3/14/2022	593.93	10.99	582.94
	4/6/2022	593.93	10.66	583.27
	5/23/2022	593.93	11.15	582.78
	6/29/2022	593.93	11.85	582.08
	7/19/2022	593.93	11.54	582.39
	8/23/2022	593.93	11.73	582.20
	9/20/2022	593.93	11.27	582.66
10/13/2022	593.93	12.30	581.63	
11/15/2022	593.93	11.85	582.08	
12/19/2022	593.93	11.07	582.86	

Table 5. Groundwater Elevations - Midwest Generation, LLC, Will County Station Ponds 1N-1S, Romeoville, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TOC)	Groundwater Elevation (ft above MSL)
MW-07	5/24/2021	592.89	11.42	581.47
	6/11/2021	592.89	11.66	581.23
	7/12/2021	592.89	11.09	581.80
	8/23/2021	592.89	11.97	580.92
	11/19/2021	592.89	11.20	581.69
	1/19/2022	592.89	11.36	581.53
	2/10/2022	592.89	11.41	581.48
	3/14/2022	592.89	10.69	582.20
	4/6/2022	592.89	9.73	583.16
	5/23/2022	592.89	10.81	582.08
	6/29/2022	592.89	11.74	581.15
	7/19/2022	592.89	11.74	581.15
	8/23/2022	592.89	11.59	581.30
	9/20/2022	592.89	11.31	581.58
10/13/2022	592.89	11.91	580.98	
11/15/2022	592.89	11.88	581.01	
12/19/2022	592.89	10.98	581.91	
MW-08	5/24/2021	592.75	11.71	581.04
	6/7/2021	592.75	12.80	579.95
	7/12/2021	592.75	11.55	581.20
	8/23/2021	592.75	12.21	580.54
	11/19/2021	592.75	11.62	581.13
	1/19/2022	592.75	11.89	580.86
	2/10/2022	592.75	11.92	580.83
	3/14/2022	592.75	10.96	581.79
	4/6/2022	592.75	10.22	582.53
	5/23/2022	592.75	11.26	581.49
	6/29/2022	592.75	12.30	580.45
	7/19/2022	592.75	12.06	580.69
	8/23/2022	592.75	11.83	580.92
	9/20/2022	592.75	11.66	581.09
10/13/2022	592.75	11.98	580.77	
11/15/2022	592.75	12.13	580.62	
12/19/2022	592.75	11.35	581.40	
MW-09	11/9/2015	592.87	11.38	581.49
	2/16/2016	592.87	11.03	581.84
	5/24/2016	592.87	11.35	581.52
	8/9/2016	592.87	11.43	581.44
	10/25/2016	592.87	10.74	582.13
	1/31/2017	592.87	11.15	581.72
	5/9/2017	592.87	10.45	582.42
	6/27/2017	592.87	11.66	581.21
	9/6/2017	592.87	11.95	580.92
	11/14/2017	592.87	11.54	581.33
	2/27/2018	592.87	10.13	582.74
	5/1/2018	592.87	11.39	581.48
	10/2/2018	592.87	11.91	580.96
	5/28/2019	592.87	9.65	583.22
	12/5/2019	592.87	11.17	581.70
	5/26/2020	592.87	9.67	583.20
	11/3/2020	592.87	11.90	580.97
	5/25/2021	592.87	12.02	580.85
	11/19/2021	592.87	11.84	581.03
	1/19/2022	592.87	12.04	580.83
	2/10/2022	592.87	12.12	580.75
	3/14/2022	592.87	11.48	581.39
	4/6/2022	592.87	10.46	582.41
	5/23/2022	592.87	11.22	581.65
6/29/2022	592.87	12.20	580.67	
7/19/2022	592.87	11.86	581.01	
8/23/2022	592.87	11.59	581.28	
9/20/2022	592.87	11.39	581.48	
10/13/2022	592.87	11.97	580.90	
11/15/2022	592.87	12.25	580.62	
12/19/2022	592.87	11.34	581.53	

Table 5. Groundwater Elevations - Midwest Generation, LLC, Will County Station Ponds 1N-1S, Romeoville, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TOC)	Groundwater Elevation (ft above MSL)
MW-13	5/24/2021	592.80	10.92	581.88
	6/7/2021	592.80	11.02	581.78
	7/12/2021	592.80	10.90	581.90
	8/23/2021	592.80	11.30	581.50
	11/19/2021	592.80	10.85	581.95
	1/19/2022	592.80	11.03	581.77
	2/10/2022	592.80	11.22	581.58
	3/14/2022	592.80	10.92	581.88
	4/6/2022	592.80	9.85	582.95
	5/23/2022	592.80	10.85	581.95
	6/29/2022	592.80	10.95	581.85
	7/19/2022	592.80	10.90	581.90
	8/23/2022	592.80	10.84	581.96
9/20/2022	592.80	10.94	581.86	
10/13/2022	592.80	10.94	581.86	
11/15/2022	592.80	10.98	581.82	
12/19/2022	592.80	9.37	583.43	
MW-14	5/24/2021	592.70	10.79	581.91
	6/7/2021	592.70	10.99	581.71
	7/12/2021	592.70	10.58	582.12
	8/23/2021	592.70	11.35	581.35
	11/19/2021	592.70	10.95	581.75
	1/19/2022	592.70	10.99	581.71
	2/10/2022	592.70	11.15	581.55
	3/14/2022	592.70	10.65	582.05
	4/6/2022	592.70	10.23	582.47
	5/23/2022	592.70	10.60	582.10
	6/29/2022	592.70	11.14	581.56
	7/19/2022	592.70	11.07	581.63
	8/23/2022	592.70	11.06	581.64
9/20/2022	592.70	10.82	581.88	
10/13/2022	592.70	11.30	581.40	
11/15/2022	592.70	11.32	581.38	
12/19/2022	592.70	10.68	582.02	
MW-15	5/24/2021	592.89	10.24	582.65
	6/7/2021	592.89	10.56	582.33
	7/12/2021	592.89	10.11	582.78
	8/23/2021	592.89	11.02	581.87
	11/19/2021	592.89	10.30	582.59
	1/19/2022	592.89	10.38	582.51
	2/10/2022	592.89	10.58	582.31
	3/14/2022	592.89	9.70	583.19
	4/6/2022	592.89	8.72	584.17
	5/23/2022	592.89	9.87	583.02
	6/29/2022	592.89	10.68	582.21
	7/19/2022	592.89	10.67	582.22
	8/23/2022	592.89	10.61	582.28
9/20/2022	592.89	10.39	582.50	
10/13/2022	592.89	11.97	580.92	
11/15/2022	592.89	10.89	582.00	
12/19/2022	592.89	10.08	582.81	

MSL - Mean Sea Level

TOC - Top of Casing

Table 6. Groundwater Flow Direction and Estimated Seepage Velocity/Flow Rate - Will County Generation Station. Ponds 1N-1S.

DATE	Groundwater Flow Direction	Kavg (ft/sec)*	Average Hydraulic Gradient (ft/ft)	Porosity (unitless)**	Estimated Seepage Velocity (ft/day)
1/19/2022	West	2.315E-04	0.0064	0.2	0.64
2/10/2022	West	2.315E-04	0.0041	0.2	0.41
3/14/2022	West	2.315E-04	0.0052	0.2	0.52
4/6/2022	West	2.315E-04	0.0042	0.2	0.42
5/23/2022	West	2.315E-04	0.0050	0.2	0.50
6/29/2022	West	2.315E-04	0.0047	0.2	0.47
7/19/2022	West	2.315E-04	0.0043	0.2	0.43
8/23/2022	West	2.315E-04	0.0039	0.2	0.39
9/20/2022	West	2.315E-04	0.0047	0.2	0.47
10/13/2022	West	2.315E-04	0.0047	0.2	0.47
11/15/2022	West	2.315E-04	0.0043	0.2	0.43
12/19/2022	West	2.315E-04	0.0075	0.2	0.75

* 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.

** - Porosity estimate from Groundwater, Freeze and Cherry, 1979.

Table 7. CCR Groundwater Sample Collection Summary for 2022 - Will County Generating Station. Ponds 1N/1S.

Well ID	Number of Groundwater Sampling Events	Dates Groundwater Sampling Events
MW-01 (Upgradient)	4	2/21/2022
		6/15/2022
		8/24/2022
		11/15/2022
MW-02 (Upgradient)	4	2/21/2022
		6/15/2022
		8/24/2022
		11/15/2022
MW-03 (Upgradient)	4	2/24/2022
		6/16/2022
		8/24/2022
		11/15/2022
MW-04 (Upgradient)	4	2/24/2022
		6/16/2022
		8/24/2022
		11/15/2022
MW-07 (Downgradient)	4	2/22/2022
		6/15/2022
		8/25/2022
		11/15/2022
MW-08 (Downgradient)	4	2/24/2022
		6/15/2022
		8/25/2022
		11/17/2022
MW-09 (Downgradient)	4	2/22/2022
		6/15/2022
		8/25/2022
		11/16/2022
MW-13 (Downgradient)	4	2/23/2022
		6/14/2022
		8/23/2022
		11/16/2022
MW-14 (Downgradient)	4	2/23/2022
		6/14/2022
		8/23/2022
		11/17/2022
MW-15 (Downgradient)	4	2/22/2022
		6/14/2022
		8/23/2022
		11/17/2022

FIGURES

SEWAGE
TREATMENT
PLANT

WASTEWATER
TREATMENT

N

DES PLAINES RIVER

MW-15

MW-01

ASH
POND
1-N

MW-07

MW-02

MW-14

MW-08

MW-03

ASH
POND
1-S

MW-13

MW-04

MW-09

ASH
POND
2-S

MW-05

MW-11

ASH
POND
3-S

MW-06

MW-10

MW-12

RETENTION
POND

LEGEND

MW-13 1-N 1-S CCR MONITORING WELL

0 250'

APPROXIMATE SCALE

ENVIRONMENTAL CONSULTATION & REMEDIATION

K P R G

KPRG and Associates, inc.

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

SITE MAP

WILL COUNTY STATION
ROMEOVILLE, ILLINOIS

Scale: 1" = 250'

Date: January 18, 2022

KPRG Project No. 12313.3

FIGURE 1

T:\c-pdp\projects\indwest\generation\groundwater\will county\will co station\cw_map.dwg

SEWAGE
TREATMENT
PLANT

WASTEWATER
TREATMENT

N

MW-15	
PARAMETER	RESULT
CALCIUM	170

MW-15

MW-07

MW-01

MW-01	
PARAMETER	RESULT
CALCIUM	190

MW-14	
PARAMETER	RESULT
SULFATE	570

MW-14

MW-02

MW-02	
PARAMETER	RESULT
ARSENIC	0.017

MW-08	
PARAMETER	RESULT
MOLYBDENUM	0.11

MW-08

MW-03

ASH
POND
1-S

MW-13

MW-04

MW-09

ASH
POND
2-S

MW-05

MW-11

ASH
POND
3-S

MW-06

MW-10

MW-12

RETENTION
POND

NOTE:
RESULTS ARE IN MILLIGRAMS PER LITER (mg/L).

LEGEND:
MW-13 1-N 1-S CCR MONITORING WELL

0 250'
APPROXIMATE SCALE

ENVIRONMENTAL CONSULTATION & REMEDIATION

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4Q22 AREAL DISTRIBUTION MAP OF
PARAMETERS ABOVE PROPOSED GWPSs

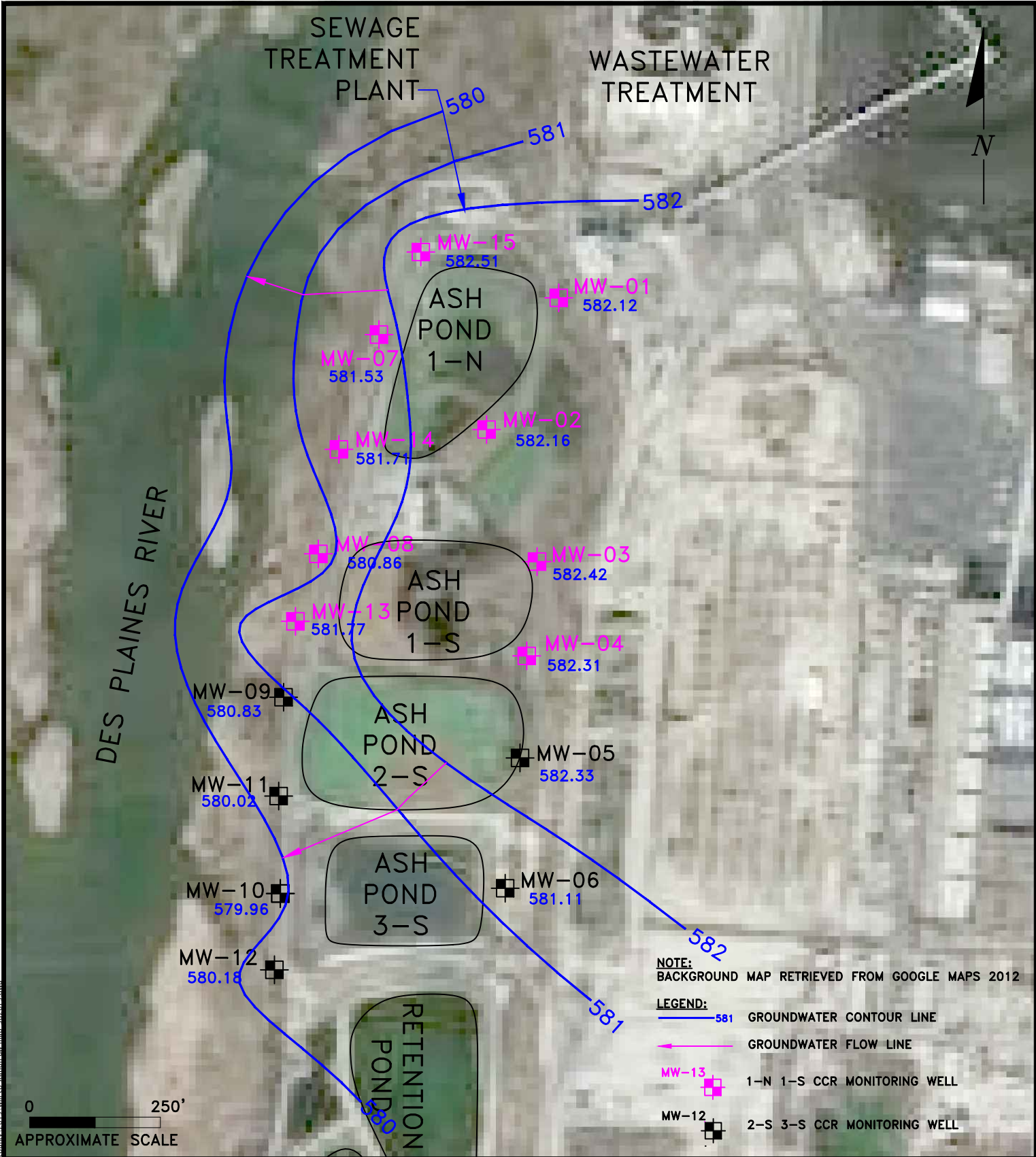
WILL COUNTY STATION, PONDS 1-N 1-S,
ROMEOWILLE, ILLINOIS

Scale: 1" = 250' Date: January 10, 2023

KPRG Project No. 12313.3

Figure 2

ATTACHMENT 1
Monthly Potentiometric Maps



ENVIRONMENTAL CONSULTATION & REMEDIATION

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KPRG and Associates, inc.

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

POTENTIOMETRIC MAP 01/2022

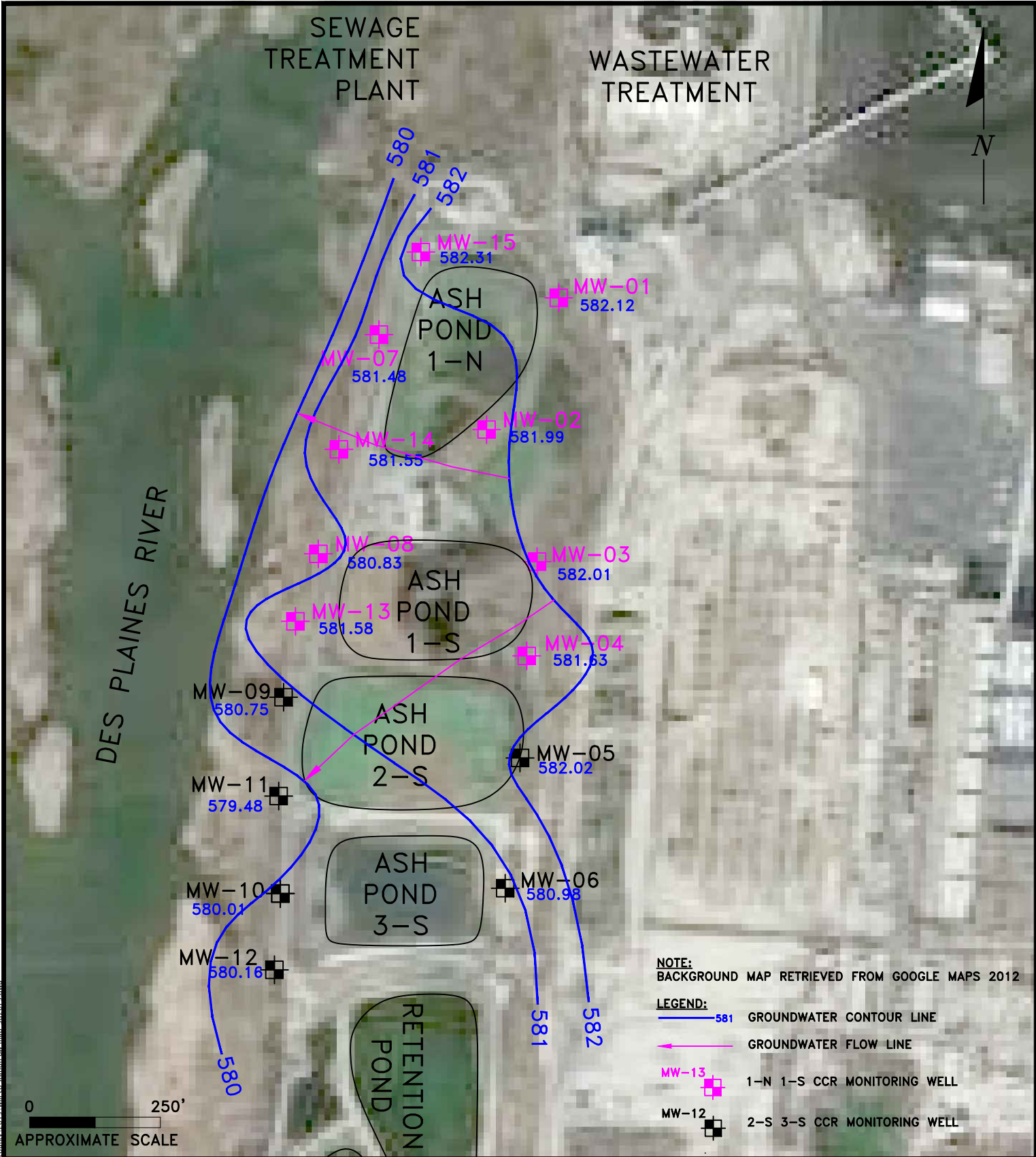
**WILL COUNTY STATION, PONDS 1-N 2-S,
ROMEOWILLE, ILLINOIS**

Scale: 1" = 250'

Date: April 13, 2022

KPRG Project No. 12313.3

ATTACHMENT 1



NOTE:
BACKGROUND MAP RETRIEVED FROM GOOGLE MAPS 2012

- LEGEND:
- 581 GROUNDWATER CONTOUR LINE
 - GROUNDWATER FLOW LINE
 - MW-13 1-N 1-S CCR MONITORING WELL
 - MW-12 2-S 3-S CCR MONITORING WELL

ENVIRONMENTAL CONSULTATION & REMEDIATION

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

POTENTIOMETRIC MAP 02/2022

WILL COUNTY STATION, PONDS 1-N 1-S,
ROMEOWILLE, ILLINOIS

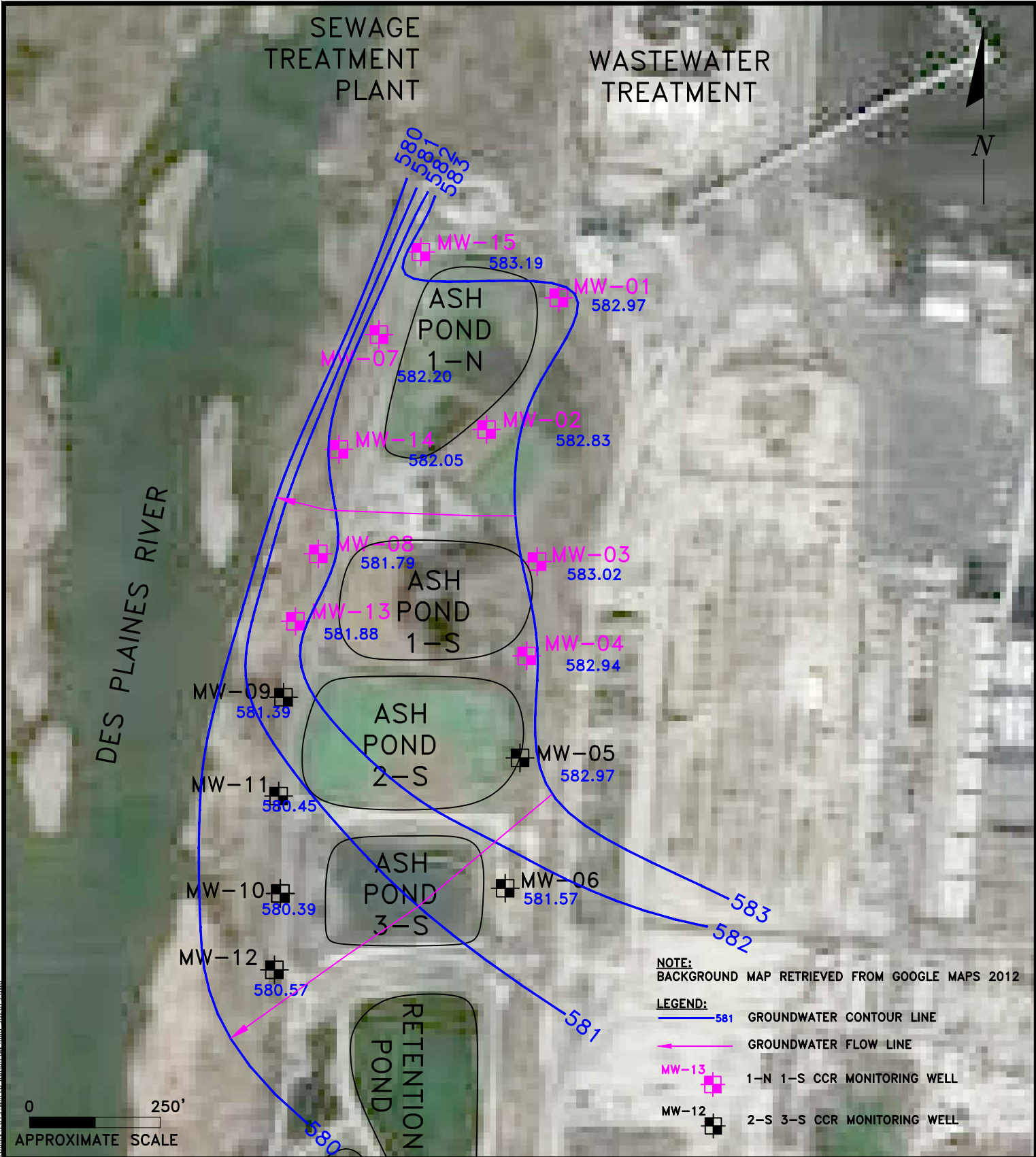
Scale: 1" = 250'

Date: April 13, 2022

KPRG Project No. 12313.3

ATTACHMENT 1

W:\projects\12313.3\figures\will_county\2019\will_co_station.mxd; 3/20/2019 9:40am



ENVIRONMENTAL CONSULTATION & REMEDIATION

K P R G

KPRG and Associates, inc.

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

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

POTENTIOMETRIC MAP 03/2022

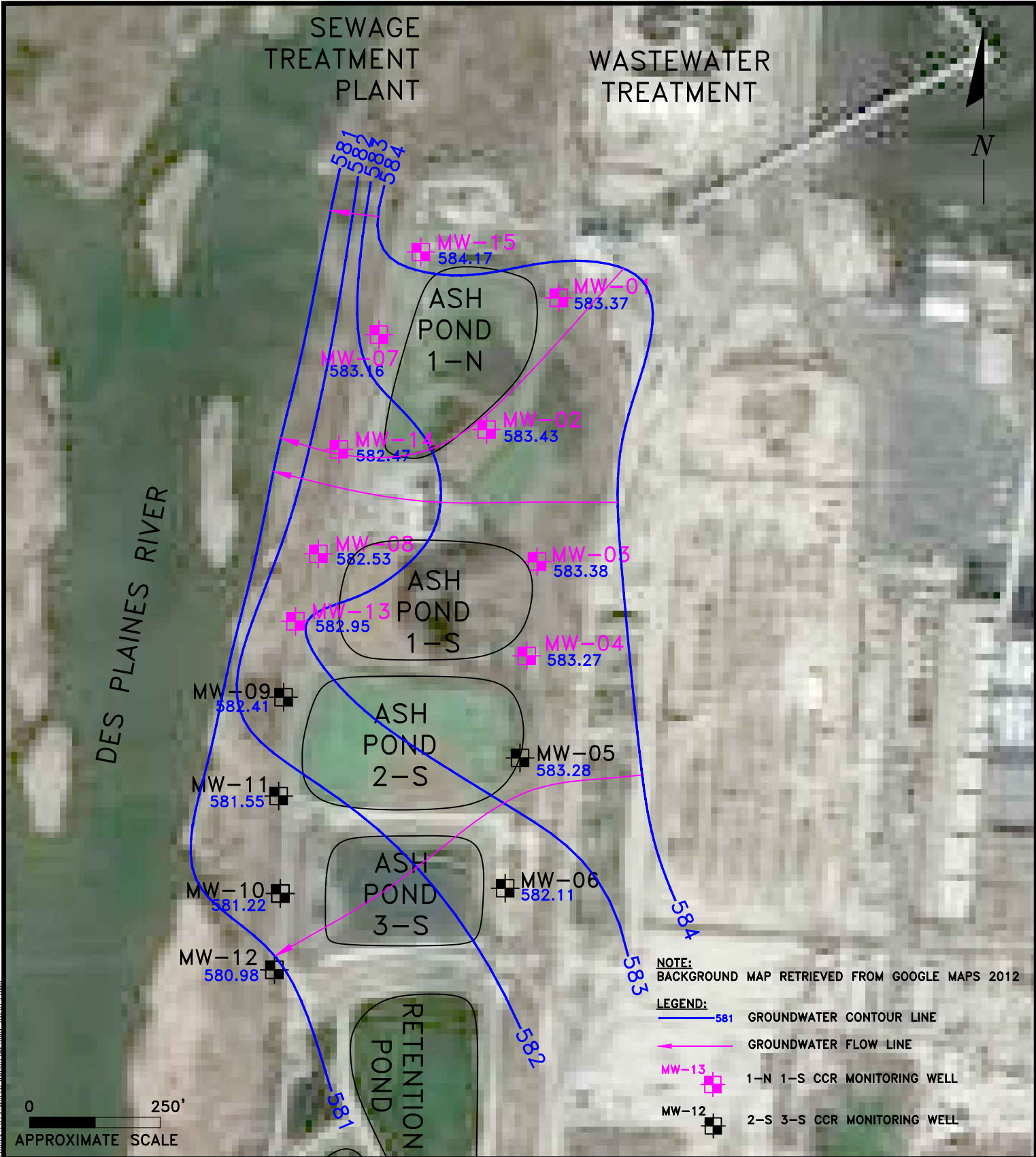
WILL COUNTY STATION, PONDS 1-N 1-S,
ROMEOWILLE, ILLINOIS

Scale: 1" = 250'

Date: April 13, 2022

KPRG Project No. 12313.3

ATTACHMENT 1



ENVIRONMENTAL CONSULTATION & REMEDIATION

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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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POTENTIOMETRIC MAP 04/2022

WILL COUNTY STATION, PONDS 1-N 1-S,
ROMEOWILLE, ILLINOIS

Scale: 1" = 250'

Date: May 09, 2022

KPRG Project No. 12313.3

ATTACHMENT 1

W:\projects\willcountystation\12313.3\figures\willcountystation\2019\will_countystation.mxd:3/20/2019.dwg

SEWAGE
TREATMENT
PLANT

WASTEWATER
TREATMENT



DES PLAINES RIVER

MW-15
583.02
ASH
POND
1-N
MW-01
582.81

MW-14
582.10
MW-02
582.80

MW-03
581.49
ASH
POND
1-S
MW-03
582.83
MW-13
581.95
MW-04
582.78

MW-09
581.65
ASH
POND
2-S
MW-05
582.81
MW-11
579.69

MW-10
581.97
ASH
POND
3-S
MW-06
581.56
MW-12
580.63

RETENTION
POND

NOTE:
BACKGROUND MAP RETRIEVED FROM GOOGLE MAPS 2012

- LEGEND:
-  581 GROUNDWATER CONTOUR LINE
 -  GROUNDWATER FLOW LINE
 -  MW-13 1-N 1-S CCR MONITORING WELL
 -  MW-12 2-S 3-S CCR MONITORING WELL

0 250'
APPROXIMATE SCALE

ENVIRONMENTAL CONSULTATION & REMEDIATION

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

POTENTIOMETRIC MAP 05/2022

WILL COUNTY STATION, PONDS 1-N 1-S,
ROMEOWILLE, ILLINOIS

Scale: 1" = 250'

Date: July 28, 2022

KPRG Project No. 12313.3

ATTACHMENT 1

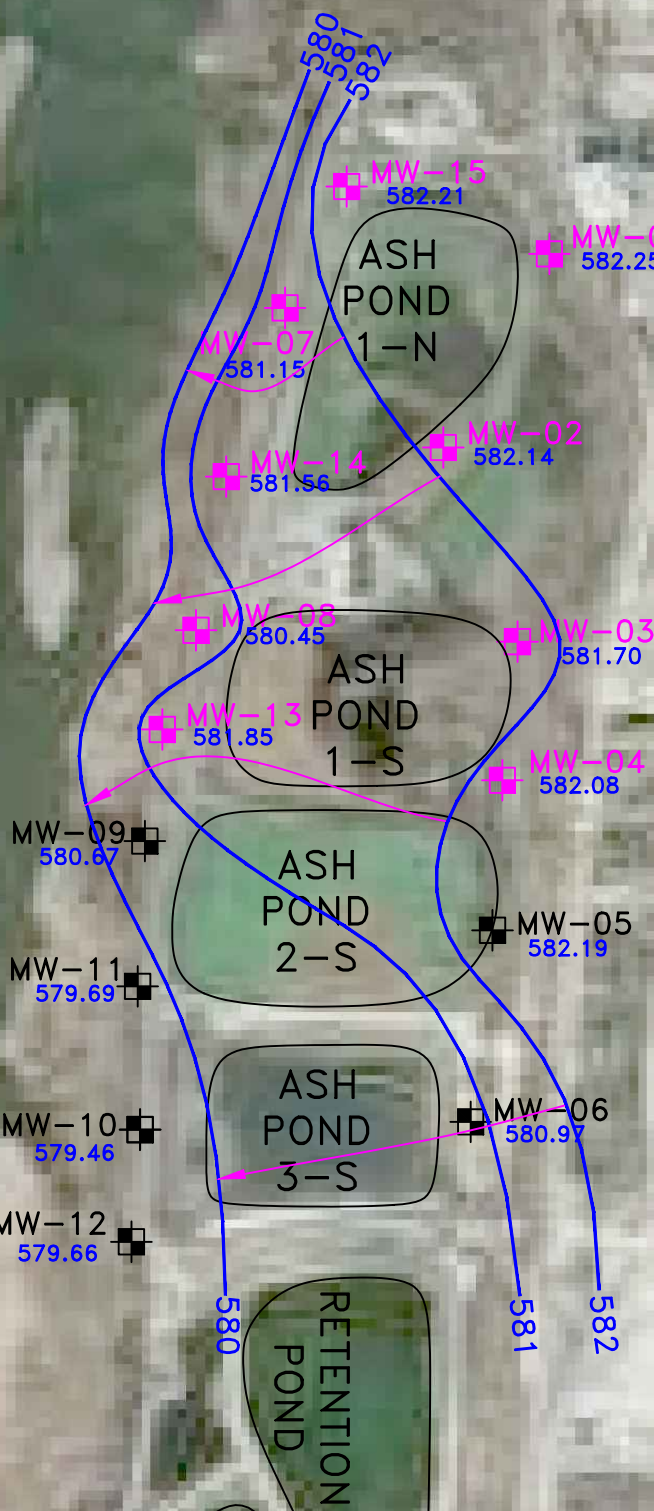
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SEWAGE
TREATMENT
PLANT

WASTEWATER
TREATMENT

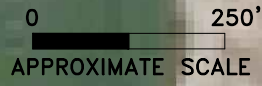


DES PLAINES RIVER



NOTE:
BACKGROUND MAP RETRIEVED FROM GOOGLE MAPS 2012

- LEGEND:
- 581 GROUNDWATER CONTOUR LINE
 - GROUNDWATER FLOW LINE
 - MW-13 1-N 1-S CCR MONITORING WELL
 - MW-12 2-S 3-S CCR MONITORING WELL



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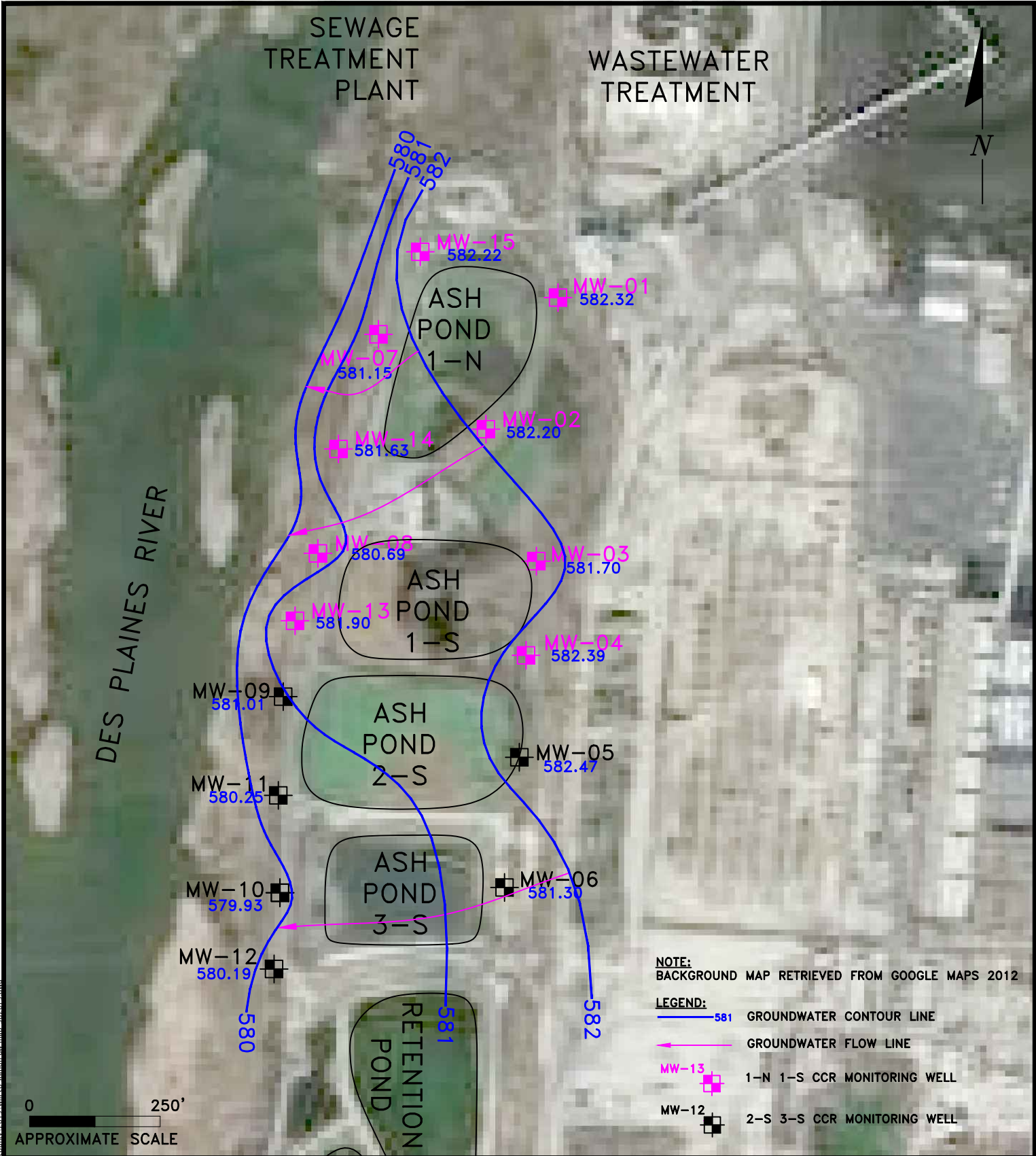
POTENTIOMETRIC MAP 06/2022

WILL COUNTY STATION, PONDS 1-N 1-S,
ROMEOWILLE, ILLINOIS

Scale: 1" = 250' Date: August 18, 2022

KPRG Project No. 12313.3 ATTACHMENT 1

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POTENTIOMETRIC MAP 07/2022

WILL COUNTY STATION, PONDS 1-N 1-S,
ROMEOWILLE, ILLINOIS

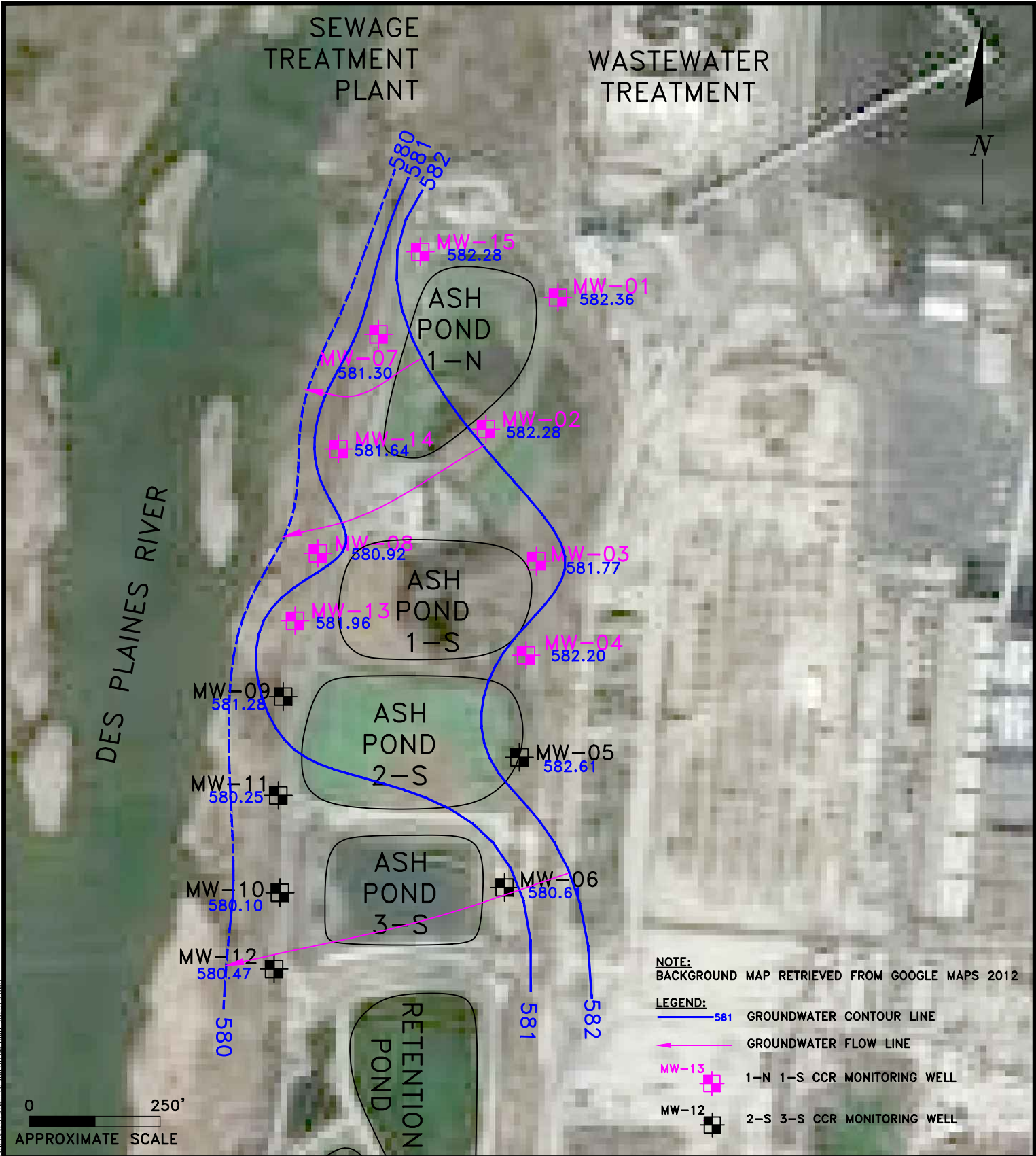
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Date: September 27, 2022

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 08/2022

WILL COUNTY STATION, PONDS 1-N 1-S,
ROMEOWILLE, ILLINOIS

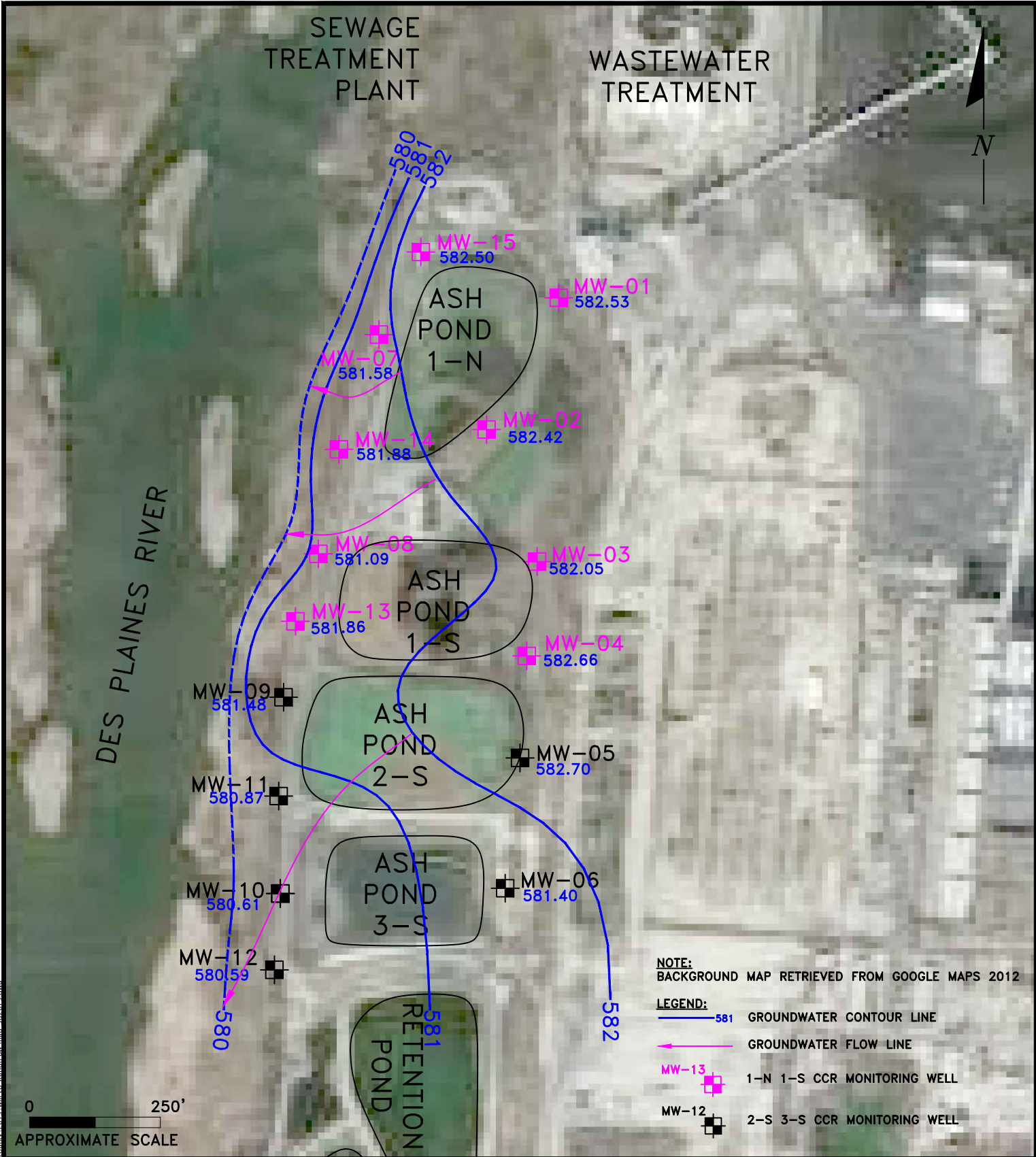
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Date: October 14, 2022

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 09/2022

WILL COUNTY STATION, PONDS 1-N 1-S,
ROMEOWILLE, ILLINOIS

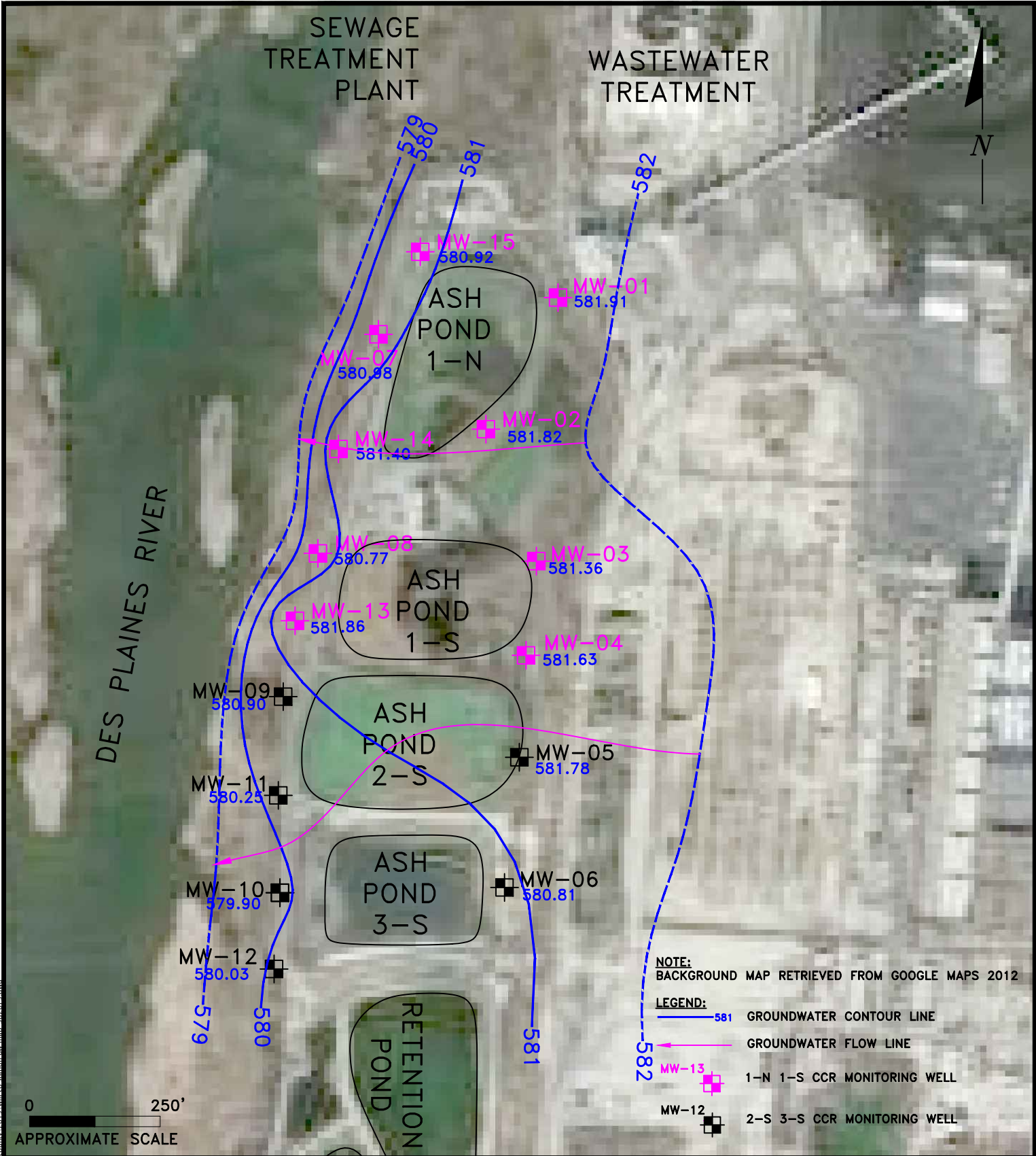
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Date: November 1, 2022

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 10/2022

**WILL COUNTY STATION, PONDS 1-N 1-S,
ROMEOVILLE, ILLINOIS**

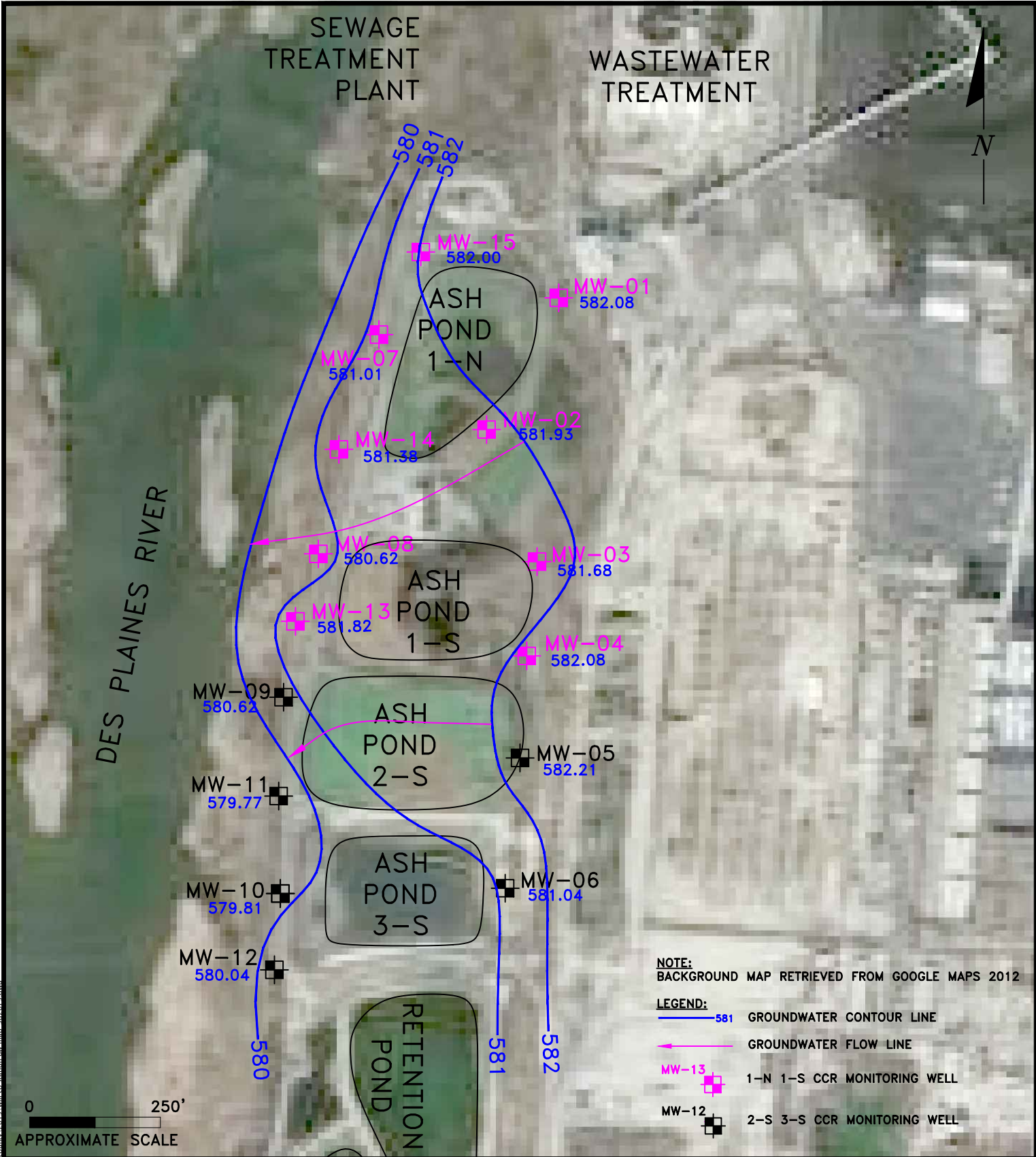
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Date: November 2, 2022

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 11/2022

WILL COUNTY STATION, PONDS 1-N 1-S,
ROMEOWILLE, ILLINOIS

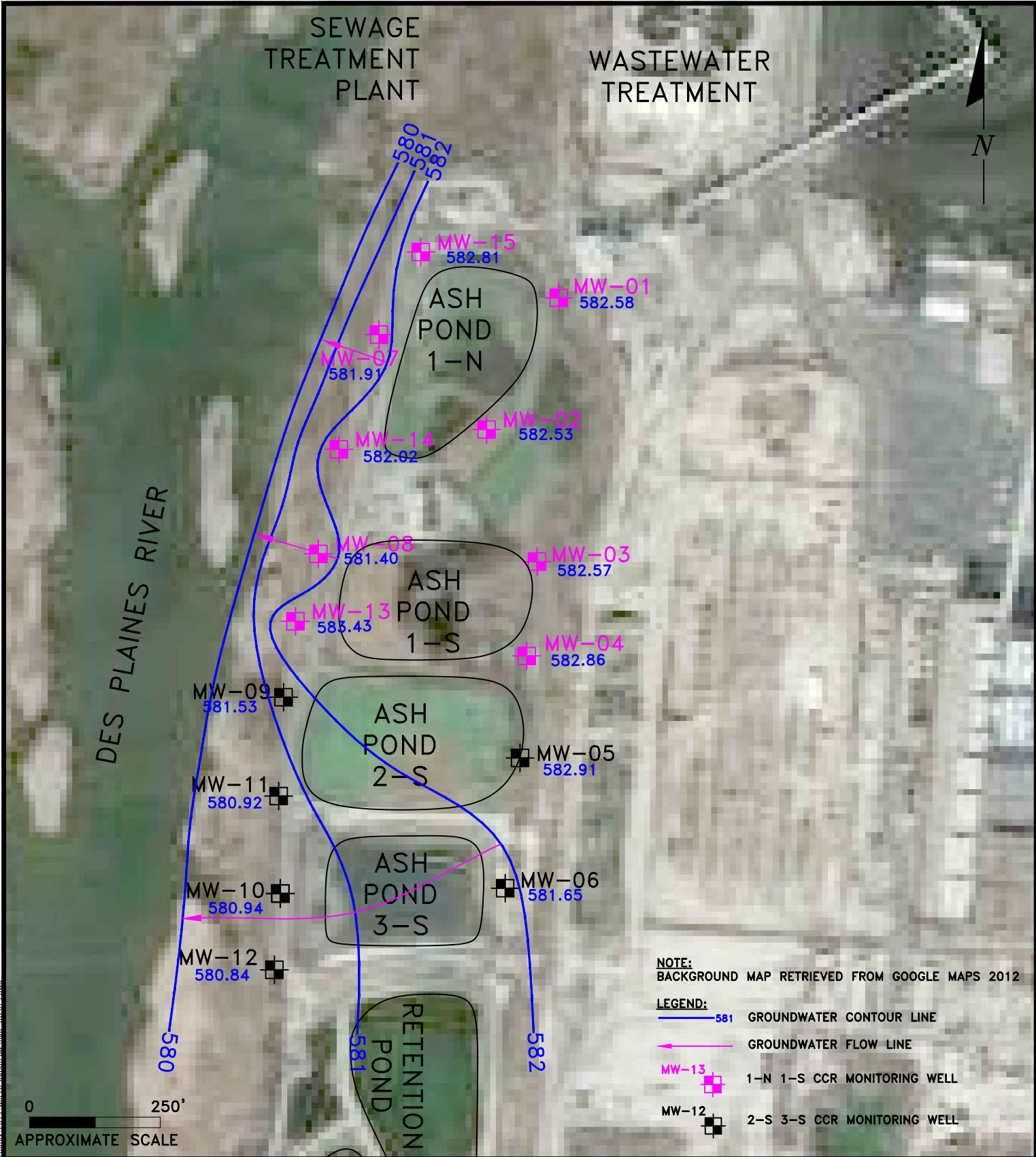
Scale: 1" = 250'

Date: December 27, 2022

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 12/2022

**WILL COUNTY STATION, PONDS 1-N 1-S,
ROMEOWILLE, ILLINOIS**

Scale: 1" = 250'

Date: January 3, 2023

KPRG Project No. 12313.3

ATTACHMENT 1

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ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

**ILLINOIS CCR COMPLIANCE
ASH PONDS 2 SOUTH and 3 SOUTH
ANNUAL GROUNDWATER MONITORING and
CORRECTIVE ACTION REPORT - 2022**

**Midwest Generation, LLC
Will County Station
529 Old Romeo Rd.
Romeoville, Illinois**

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

January 30, 2023

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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), have been completed for the monitoring wells associated with Ash Ponds 2 South (2S) and 3 South (3S) located at the Midwest Generation, LLC (Midwest Generation) Will County Generating Station. The wells sampled were selected to meet the monitoring requirements of the State CCR Rule for the Ash Ponds 2S and 3S. The CCR monitoring well network around these ponds consists of six monitoring wells (MW-05, MW-06, MW-09, MW-10, MW-11, and MW-12). Wells MW-05 and MW-06 are upgradient wells as shown 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 and 2. As part of the Application for Initial Operating Permit – Will County Generating Station submitted on October 31, 2021 (Application), *proposed* statistical background concentration calculations along with *proposed* site-specific Groundwater Protection Standards (GWPSs) were submitted for Illinois Environmental Protection Agency (Agency) review/approval. Table 3 summarizes the *proposed* background statistical concentrations for each parameter along with the site-specific *proposed* GWPSs in accordance with Section 845.600(a)(2). These are currently still under review by the Agency and therefore, are not finalized. However, for the purposes of evaluations required for the annual report, data comparisons will be presented relative to the “*proposed*” values for statistical background concentrations and site-specific GWPSs.

This overview of the 2022 groundwater monitoring period 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) – *Proposed* statistical background concentration calculations (see Table 3) were submitted to the Agency as part of the Application for Initial Operating Permit. This Application is currently still under Agency review. However, assuming that the Agency accepts the proposed background calculations, for the 2022 reporting period, the following constituents with potential statistically significant increases (SSIs) above the *proposed* background concentrations. It is noted that other than those constituents identified in the next main bullet, none of these potential SSI concentrations are above *proposed* site-specific GWPSs. The constituents and associated wells are:
 - Boron: MW-05 (1st through 4th quarters)
 - Chloride: MW-09 (1st through 4th quarters) and MW-12 (2nd through 4th quarters)
 - Fluoride: MW-10 (1st through 4th quarters) and MW-12 (4th quarter)
 - pH: MW-5 (3rd quarter)
 - Total Dissolved Solids: MW-05 (1st and 2nd quarters), MW-12 (1st through 4th quarters)
 - Arsenic: MW-05 (1st and 4th quarters), and MW-09, MW-10 and MW-11 (1st through 4th quarters)
 - Barium: MW-10 (3rd quarter), and MW-11 and MW-12 (1st through 4th quarters)

- Cadmium: MW-05 (4th quarter)
- Chromium: MW-05 (4th quarter), MW-10 (3rd quarter)
- Lead: MW-10 (1st, 3rd and 4th quarters), MW-11 (1st, 2nd and 4th quarters), MW-12 (1st quarter)
- Radium: MW-06 (3rd and 4th quarters), MW-09 (3rd quarter), MW-10 and MW-11 (1st through 4th quarters), MW-12 (2nd and 3rd quarters)
- Selenium: MW-05 (4th quarter)

Wells MW-05 and MW-06 are the upgradient wells.

- Section 845.610(e)(4)(C and D) – *Proposed* GWPSs in accordance with Section 845.600(a)(2) (see Table 3) were submitted to the Agency as part of the Application for Initial Operating Permit. This Application is currently still under review by the Agency. However, assuming that the Agency accepts the *proposed* GWPSs, for the 2022 reporting period, the following constituents above the *proposed* GWPSs:
 - Boron: MW-05 (1st through 4th quarters)
 - Chloride: MW-09 (1st through 4th quarters), MW-12 (2nd quarter)
 - Total Dissolved Solids: MW-05 (1st quarter)
 - Arsenic: MW-05 (4th quarter), MW-10 (2nd and 4th quarters), MW-11 (1st and 4th quarters)
 - Lead: MW-10 (3rd quarter)
 - Selenium: MW-05 (4th quarter)

Wells MW-05 and MW-06 are the upgradient wells.

- Section 845.610(e)(4)(E through H) – Ash Ponds 2S and 3S are currently not in corrective action.

2.0 ANNUAL STATUS SUMMARY

As discussed in Section 1.0 the CCR monitoring well network around Ash Ponds 2S and 3S consists of six monitoring wells (MW-05, MW-06, MW-09, MW-10, MW-11, and MW-12). Wells MW-05 and MW-06 are upgradient wells as shown 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 and 2. The backup analytical packages have been previously provided as part of the 60-day submittal requirements. Table 3 summarizes the *proposed* background statistical concentrations for each parameter along with the site-specific *proposed* GWPSs in accordance with Section 845.600(a)(2). These are included as part of the Initial Operating Permit Application referenced above, are currently still under review by the Agency and therefore, are not finalized. However, for the purposes of evaluations required for this annual report, data comparisons will be presented relative to the “*proposed*” values for statistical background concentrations and site-specific GWPSs.

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))

During the 2022 reporting period, the following key actions have been completed:

- 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 placed in the facilities operating record in accordance with Section 845.610(b)(3)(D).
- Water levels were recorded monthly for the specified CCR monitoring wells and pond water levels were concurrently recorded.
- Work was initiated on the Application for Initial Construction Permit – Will County Generating Station in accordance with Section 845.230.

Key activities for the upcoming year include:

- Submittal of the Application for Initial Construction Permit – Will County Generating Station which will include public input from the pre-submittal required public meetings.
- Receipt of an approved Application for Initial Operating Permit which will facilitate finalization of the proposed statistical background concentrations and the proposed site-specific GWPSs. Once these are accepted/finalized by the Agency, formal groundwater data comparisons and evaluations can be made based on quarterly monitoring results relative to these comparison criteria.
- Continued quarterly groundwater monitoring/reporting.

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 for the most recent round of groundwater sampling (4th quarter 2022) is provided on Figure 2.

There were no monitoring wells installed or decommissioned during this reporting period.

Water levels were recorded from the specified CCR monitoring wells as part of each sampling event and are summarized in Table 4. Potentiometric surface maps for each round of available water levels are provided in Attachment 1. Groundwater flow beneath Ash Ponds 2S and 3S is consistently in a westerly direction. 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 5.

A summary of the number of groundwater samples collected for analysis for each CCR monitoring well along with sample dates is provided in Table 6.

Proposed statistical background concentration calculations (see Table 3) were submitted to the Agency as part of the Application for Initial Operating Permit. This Application is currently still under Agency review. However, assuming that the Agency accepts the *proposed* background calculations, the groundwater monitoring over the 2022 reporting period has identified the following constituents with potential statistically significant increases (SSIs) above the *proposed* background concentrations:

- Boron: MW-05 (1st through 4th quarters)
- Chloride: MW-09 (1st through 4th quarters) and MW-12 (2nd through 4th quarters)
- Fluoride: MW-10 (1st through 4th quarters) and MW-12 (4th quarter)
- pH: MW-5 (3rd quarter)
- Total Dissolved Solids: MW-05 (1st and 2nd quarters), MW-12 (1st through 4th quarters)
- Arsenic: MW-05 (1st and 4th quarters), and MW-09, MW-10 and MW-11 (1st through 4th quarters)
- Barium: MW-10 (3rd quarter), and MW-11 and MW-12 (1st through 4th quarters)
- Cadmium: MW-05 (4th quarter)
- Chromium: MW-05 (4th quarter), MW-10 (3rd quarter)
- Lead: MW-10 (1st, 3rd and 4th quarters), MW-11 (1st, 2nd and 4th quarters), MW-12 (1st quarter)
- Radium: MW-06 (3rd and 4th quarters), MW-09 (3rd quarter), MW-10 and MW-11 (1st through 4th quarters), MW-12 (2nd and 3rd quarters)
- Selenium: MW-05 (4th quarter)

Wells MW-05 and MW-06 are upgradient wells. As previously stated, other than those constituents identified in the second bullet in Section 1.0, none of these potential SSI concentrations are above *proposed* site-specific GWPSs.

TABLES

Table 1. Groundwater Analytical Data, Pond 2S and Pond 3S, Midwest Generation, LLC, Will County Generating Station, Romeoville, IL.

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 Combined	Selenium	Thallium	
MW-05 up-gradient	11/11/2015	6.1	220	110	0.31	7.24	770	1,900	< 0.003	0.0014	0.071	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.013	< 0.0002	0.0750	-0.168	0.031	< 0.002	
	2/18/2016	4.4	230	120	0.31	6.99	730	1,600	< 0.003	0.0021	0.058	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.017	< 0.0002	0.079	0.468	0.019	< 0.002	
	5/26/2016	3.7	170	110	0.33	6.73	670	1,500	< 0.003	0.0023	0.055	^< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.011	< 0.0002	0.077	< 0.402	0.019	< 0.002	
	8/10/2016	3.6	67	120	0.72	8.62	480	970	< 0.003	0.0044	0.043	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.010	F1 < 0.0002	0.14	< 0.394	0.0049	< 0.002	
	10/26/2016	3.6	44	120	0.70	9.08	410	920	< 0.003	0.0047	0.033	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.12	< 0.592	< 0.0025	< 0.002	
	2/1/2017	4.6	250	48	0.35	6.81	530	1,600	< 0.003	0.0015	0.058	* < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.016	^ < 0.0002	0.048	< 0.424	0.029	< 0.002	
	5/11/2017	4.0	140	85	0.31	7.86	610	1,200	< 0.003	0.0035	0.053	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.093	< 0.388	< 0.0025	< 0.002	
	6/27/2017	3.8	83	99	0.53	7.95	500	1,000	< 0.003	0.0037	0.045	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.11	0.412	< 0.0025	< 0.002	
	9/8/2017	4.8	89	78	0.52	9.40	490	1,000	< 0.003	0.0038	V 0.069	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.095	0.486	0.0047	< 0.002	
	11/16/2017	4.8	180	52	0.45	6.70	650	1,500	< 0.003	0.0028	0.065	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.021	< 0.0002	0.064	< 0.379	0.012	< 0.002	
	5/2/2018	3.6	200	32	0.39	7.23	510	1,300	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	10/3/2018	4.9	150	55	0.48	7.07	430	1,200	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5/29/2019	4.1	61	91	0.59	9.10	380	870	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	12/6/2019	4.9	170	31	0.41	6.95	440	1,200	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5/22/2020	4.5	52	70	0.59	7.39	300	870	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	11/4/2020	5.0	130	29	0.38	7.06	410	1,100	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5/24/2021	4.7	120	28	0.53	7.07	430	1,000	< 0.003	0.0011	0.046	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.015	< 0.0002	0.063	< 0.492	0.042	< 0.002	
	8/24/2021	4.6	33	45	0.74	9.42	410	580	< 0.003	0.0054	0.028	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.091	1.230	< 0.0025	< 0.002	
	11/23/2021	5.5	140	22	0.44	6.80	370	1,100	< 0.003	0.0035	0.066	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.017	< 0.0002	0.066	0.784	0.012	< 0.002	
	2/24/2022	4.9	210	25	0.39	6.73	660	1,400	< 0.003	0.0092	0.077	< ^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.014	< 0.0002	0.059	< 0.415	0.048	< 0.002	
6/16/2022	5.1	120	41	0.34	7.05	510	1,100	< 0.003	0.0037	0.055	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.011	< 0.0002	0.064	< 0.471	0.008	< 0.002		
8/25/2022	6.6	130	20	0.4	6.69	300	940	< 0.003	0.0043	0.072	< 0.001	< ^1+ < 0.0005	< 0.005	< 0.001	< 0.0005	0.016	< 0.0002	0.061	< 0.570	0.0056	< 0.002		
11/15/2022	8.9	150	9.8	0.72	6.78	310	930	< 0.003	0.032	0.099	< ^+ < 0.001	0.004	0.0083	< 0.001	< 0.0005	0.02	< 0.0002	0.1	< 0.569	0.089	< 0.002		
MW-06 up-gradient	11/10/2015	3.0	52	100	0.55	8.63	300	660	< 0.003	0.0016	0.048	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.011	< 0.0002	0.0670	-0.383	0.039	< 0.002	
	2/18/2016	2.5	74	150	0.47	8.58	280	650	< 0.003	0.0014	0.068	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.015	< 0.0002	0.0630	0.412	< 0.0025	< 0.002	
	5/26/2016	2.7	86	92	0.44	7.79	350	800	< 0.003	0.002	0.068	^ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.012	< 0.0002	0.042	< 0.422	< 0.0025	< 0.002	
	8/11/2016	3.6	110	58	0.35	7.74	330	840	< 0.003	0.0029	0.086	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.017	< 0.0002	0.038	< 0.339	< 0.0025	< 0.002	
	10/26/2016	3.8	86	74	0.40	8.16	220	800	< 0.003	0.003	0.074	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.013	< 0.0002	0.043	< 0.531	< 0.0025	< 0.002	
	2/1/2017	3.4	70	83	0.41	7.88	260	700	< 0.003	0.0043	0.068	* < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.012	^ < 0.0002	0.05	< 0.511	0.0035	< 0.002	
	5/11/2017	3.0	75	84	0.28	8.68	330	570	< 0.003	0.002	0.054	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.011	< 0.0002	0.054	< 0.388	< 0.0025	< 0.002	
	6/27/2017	3.1	65	74	0.38	8.15	330	710	< 0.003	0.0014	0.069	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.012	< 0.0002	0.046	0.408	< 0.0025	< 0.002	
	9/7/2017	3.5	75	67	0.40	8.20	300	740	< 0.003	0.0025	0.077	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.013	< 0.0002	0.044	0.397	< 0.0025	< 0.002	
	11/16/2017	3.9	88	54	0.39	7.59	280	810	< 0.003	0.0028	0.077	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.017	< 0.0002	0.038	0.491	0.012	< 0.002	
	5/3/2018	3.0	91	52	0.26	6.91	530	750	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	7/25/2018 R	NA	NA	NA	NA	7.47	280	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	10/3/2018	3.5	93	44	0.31	7.83	240	720	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5/29/2019	4.3	120	38	0.21	7.51	350	1,000	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	7/3/2019 R	3.2	NA	NA	NA	8.28	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	12/6/2019	4.2	98	31	0.33	7.91	210	740	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5/22/2020	3.4	98	56	0.31	7.47	180	710	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	11/3/2020	3.3	100	43	0.36	7.29	170	700	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5/24/2021	2.6	99	46	0.33	7.65	160	610	< 0.003	0.0025	0.08	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.016	< 0.0002	0.017	0.576	< 0.0025	< 0.002	
	8/24/2021	2.9	100	100	0.35	7.09	170	370	< 0.003	0.0029	0.093	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.021	< 0.0002	0.018	< 0.468	< 0.0025	< 0.002	
11/23/2021	2.6	85	43	0.37	7.48	150	720	< 0.003	0.002	0.07	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.014	< 0.0002	0.017	1.02	< 0.0025	< 0.002		
2/22/2022	2.8	130	35	0.33	7.29	260	940	< 0.003	0.0019	0.09	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.018	< 0.0002	0.033	0.551	0.05	< 0.002		
6/14/2022	2.5	110	22	0.35	7.06	210	610	< 0.003	0.0018	0.082	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.014	< 0.0002	0.018	1.22	< 0.0025	< 0.002		
8/25/2022	2.7	110	20	0.42	7.31	170	750	< 0.003	0.0023	0.088	< 0.001	< ^1+ < 0.0005	< 0.005	< 0.001	< 0.0005	0.018	< 0.0002	0.021	< 0.519	< 0.0025	< 0.002		
11/15/2022	3.2	110	19	0.47	7.41	160	600	< 0.003	0.0017	0.083	< ^+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.016	< 0.0002	0.021	1.08	< 0.0025	< 0.002		
MW-09 down-gradient	11/11/2015	1.9	56	190	0.55	9.12	460	750	< 0.003	0.0047	0.027	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.14	-0.2208	< 0.0025	< 0.002	
	2/17/2016	1.8	47	160	0.55	9.10	250	600	< 0.003	0.0051	0.027	^ < 0.001	< 0.0005	< 0.005	< 0.001	0.00065	< 0.01	< 0.0002	0.089	< 0.373	< 0.0025	< 0.002	
	5/24/2016	1.6	48	180	0.51	8.79	240	640	< 0.003	0.0043	0.027	^ < 0.001	< 0.0005	< 0.005	< 0.001	0.00071	< 0.01	< 0.0002	0.079	0.508	< 0.0025	< 0.002	
	8/9/2016	2.2	53	140	0.48	8.35	280	750	< 0.003	0.0052	0.031	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.14	0.639	< 0.0025	< 0.002	
	10/26/2016	2.2	33	130	0.81	9.16	230	660	< 0.003	0.0069	0.019	< 0.001	< 0.0005	< 0.005	< 0.0010	< 0.0005	< 0.01	< 0.0002	0.11	0.6			

Table 1. Groundwater Analytical Data, Pond 2S and Pond 3S, Midwest Generation, LLC, Will County Generating Station, Romeoville, IL.

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 Combined	Selenium	Thallium	
MW-10 down-gradient	11/10/2015	3.9	140	140	0.77	7.34	310	980	< 0.003	0.015	0.096	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.018	< 0.0002	0.068	1.341	< 0.0025	< 0.002	
	2/16/2016	3.6	150	240	0.79	7.29	290	950	< 0.003	0.014	0.098	^ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.021	< 0.0002	0.075	0.952	< 0.0025	< 0.002	
	5/25/2016	3.6	120	140	0.83	7.26	260	1,000	< 0.003	0.034	0.096	^ < 0.001	< 0.0005	< 0.005	< 0.001	0.00055	0.016	< 0.0002	0.065	0.51	< 0.0025	< 0.002	
	8/10/2016	4.3	150	120	0.78	7.22	230	970	< 0.003	0.017	0.11	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.021	< 0.0002	0.082	0.864	< 0.0025	< 0.002	
	10/26/2016	3.0	160	74	0.52	7.30	220	1,000	< 0.003	0.022	0.11	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.021	< 0.0002	0.030	0.458	< 0.0025	< 0.002	
	2/2/2017	3.7	180	81	0.54	7.16	160	930	< 0.003	0.05	0.14	* < 0.001	< 0.0005	< 0.005	< 0.001	0.0013	0.02	^ < 0.0002	0.031	< 0.464	< 0.0025	< 0.002	
	5/10/2017	3.0	150	100	0.44	7.83	340	860	< 0.003	0.02	0.11	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.015	< 0.0002	0.066	0.882	< 0.0025	< 0.002	
	6/27/2017	2.8	130	110	0.67	7.49	250	930	< 0.003	0.0072	0.096	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.017	< 0.0002	0.080	0.953	< 0.0025	< 0.002	
	9/7/2017	2.8	120	120	0.77	7.37	290	920	< 0.003	0.0076	0.086	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.014	0.00058	0.096	0.921	< 0.0025	< 0.002	
	11/15/2017	4.1	140	120	0.77	7.10	270	1,000	< 0.003	0.015	0.11	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.021	< 0.0002	0.071	0.893	< 0.0025	< 0.002	
	5/1/2018	3.2	150	130	0.65	7.31	280	990	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	10/3/2018	2.5	110	140	0.89	7.60	200	860	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5/29/2019	2.8	100	140	0.82	7.53	260	860	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	12/5/2019	3.7	120	110	0.93	7.21	190	940	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5/27/2020	2.3	100	170	0.90	7.29	280	850	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	11/3/2020	3.7	130	140	0.87	7.02	180	920	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5/25/2021	3.0	160	130	0.62	7.16	160	910	< 0.003	0.018	0.18	^1+ < 0.001	< 0.0005	< 0.005	0.0013	0.0054	0.02	< 0.0002	0.036	< 1.14	< 0.0025	< 0.002	
	8/26/2021	2.5	110	140	0.82	7.70	250	740	< 0.003	0.009	0.085	< 0.001	< 0.0005	< 0.005	< 0.001	0.00073	0.017	< 0.0002	0.12	1.48	< 0.0025	< 0.002	
	11/23/2021	2.7	110	130	0.71	7.07	230	990	< 0.003	0.012	0.091	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	0.0011	0.013	< 0.0002	0.048	2.22	< 0.0025	< 0.002	
	2/24/2022	2.6	130	120	0.53	7.02	170	840	< 0.003	0.0072	0.1	< ^1+ < 0.001	< 0.0005	< 0.005	< 0.001	0.0012	0.001	0.014	< 0.0002	0.043	0.768	< 0.0025	< 0.002
6/14/2022	2.9	100	140	0.86	6.99	280	790	< 0.003	0.008	0.081	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.015	< 0.0002	0.12	1.55	< 0.0025	< 0.002		
8/25/2022	2.6	130	140	0.99	7.47	280	910	< 0.003	0.019	0.11	< 0.001	< ^1+ < 0.0005	0.0053	0.001	0.0077	0.015	< 0.0002	0.12	1.2	< 0.0025	< 0.002		
9/28/2022 (R)	NA	NA	NA	NA	NA	NA	NA	NA	0.0088	NA	NA	NA	NA	NA	0.00093	NA	NA	NA	NA	NA	NA	NA	
11/16/2022	4.4	130	160	0.94	7.15	220	910	< 0.003	0.015	0.1	< ^+ < 0.001	< 0.0005	< 0.005	< 0.001	0.002	0.018	< 0.0002	0.097	2.74	< 0.0025	< 0.002		
MW-11 down-gradient	11/10/2015	2.6	120	89	0.61	7.60	180	620	< 0.003	0.007	0.098	< 0.001	< 0.0005	< 0.005	< 0.001	0.00064	< 0.01	< 0.0002	0.0600	0.736	< 0.0025	< 0.002	
	2/16/2016	3.0	100	88	0.68	7.47	170	640	< 0.003	0.0059	0.11	^ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.012	< 0.0002	0.078	1.14	< 0.0025	< 0.002	
	5/25/2016	2.8	82	98	0.75	7.43	170	640	< 0.003	0.0073	0.093	^ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.083	0.775	< 0.0025	< 0.002	
	8/10/2016	3.1	96	86	0.72	7.57	150	660	< 0.003	0.0072	0.12	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.010	< 0.0002	0.087	0.807	< 0.0025	< 0.002	
	10/26/2016	2.5	110	67	0.53	7.82	120	630	< 0.003	0.0082	0.096	< 0.001	< 0.0005	< 0.005	< 0.001	0.00052	< 0.01	< 0.0002	0.043	0.51	< 0.0025	< 0.002	
	2/1/2017	3.9	110	72	0.65	7.54	110	600	< 0.003	0.011	0.15	* < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.076	0.909	< 0.0025	< 0.002	
	5/10/2017	3.1	95	84	0.46	8.37	170	590	< 0.003	0.014	0.14	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.074	1.03	< 0.0025	< 0.002	
	6/27/2017	2.8	87	90	0.59	7.57	150	680	< 0.003	0.0058	0.11	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.069	0.692	< 0.0025	< 0.002	
	9/7/2017	2.8	90	94	0.58	7.40	150	730	< 0.003	0.0074	0.11	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.067	0.676	< 0.0025	< 0.002	
	11/15/2017	2.9	96	100	0.65	7.41	160	750	< 0.003	0.0082	0.15	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.075	1.04	< 0.0025	< 0.002	
	5/3/2018	3.8	73	110	0.69	6.74	190	670	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	10/3/2018	3.1	78	110	0.66	7.65	120	680	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5/29/2019	2.2	86	110	0.49	7.55	120	610	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	12/5/2019	2.5	100	80	0.55	7.26	91	600	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5/26/2020	2.3	89	100	0.54	7.4	90	540	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	11/3/2020	4.3	85	140	0.72	7.17	68	710	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5/25/2021	3.8	94	130	0.74	7.68	57	660	< 0.003	0.0067	0.16	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.077	1.29	< 0.0025	< 0.002	
	8/26/2021	1.9	110	150	0.39	7.73	100	710	< 0.003	0.0076	0.1	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.011	< 0.0002	0.034	1.29	< 0.0025	< 0.002	
	11/23/2021	2.0	130	150	0.48	6.94	94	810	< 0.003	0.0085	0.11	^1+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.025	2.35	< 0.0025	< 0.002	
	12/22/2021 R	NA	NA	150	NA	7.03	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2/23/2022	1.8	130	150	0.38	6.94	91	760	< 0.003	0.013	0.12	< ^1+ < 0.001	< 0.0005	< 0.005	< 0.001	0.0006	0.011	< 0.0002	0.031	1.65	< 0.0025	< 0.002		
6/13/2022	2.8	120	140	0.4	7.22	97	700	< 0.003	0.0088	0.17	< 0.001	< 0.0005	< 0.005	0.0022	0.0018	0.011	< 0.0002	0.058	1.44	< 0.0025	< 0.002		
8/23/2022	2.5	110	140	0.53	6.94	160	740	< 0.003	0.0082	0.12	< 0.001	< ^1+ < 0.0005	< 0.005	< 0.001	< 0.0005	< 0.01	< 0.0002	0.033	2.02	< 0.0025	< 0.002		
11/16/2022	3.8	120	130	0.71	7.34	66	700	< 0.003	0.013	0.14	< ^+ < 0.001	< 0.0005	< 0.005	0.0015	0.0014	0.01	< 0.0002	0.052	1.61	< 0.0025	< 0.002		
MW-12 down-gradient	11/10/2015	2.3	150	160	0.59	7.44	290	1,000	< 0.003	0.016	0.11	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.012	< 0.0002	0.034	0.8139	< 0.0025	< 0.002	
	2/16/2016	1.8	130	140	0.52	7.38	220	850	< 0.003	0.0013	0.084	^ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.015	< 0.0002	0.031	< 0.407	< 0.0025	< 0.002	
	5/25/2016	1.9	130	150	0.54	7.23	250	890	< 0.003	0.0013	0.12	^ < 0.001	< 0.0005	< 0.005	< 0.001	0.00063	0.014	< 0.0002	0.03	0.41	< 0.0026	< 0.002	
	8/10/2016	2.4	170	140	0.49	7.20	280	1,000	< 0.003	0.0017	0.12	< 0.001	< 0.0005	< 0.005	< 0.001	0.0006	0.017	< 0.0002	0.04	< 0.426	0.0077	< 0.002	
	10/26/2016	2.6	140	120	0.49	7.44	220	980	< 0.003	0.0016	0.11	< 0.001	< 0.0005	0.025	< 0.001	< 0.0005	0.013	< 0.0002	0.036	< 0.664	< 0.0025	< 0.002	
	2/1/2017	2.0																					

Table 2. Groundwater Turbidity - Ponds 2S and 3S, Midwest Generation, LLC, Will County Generating Station, Romeoville, IL.

Well ID	Date	Turbidity (NTU)
MW-05	2/23/2021	0.63
	4/10/2021	1.28
	4/25/2021	2.41
	5/24/2021	3.78
	6/11/2021	2.4
	6/28/2021	2.89
	7/12/2021	3.93
	8/4/2021	1.35
	8/24/2021	3.5
	9/24/2021	3.59
	11/23/2021	4.45
	2/24/2022	0.37
	6/16/2022	1.76
	8/25/2022	2.99
11/15/2022	38.9	
MW-06	2/23/2021	0.31
	4/10/2021	11.17
	4/25/2021	15.04
	5/24/2021	5.18
	6/11/2021	2.96
	6/29/2021	4.06
	7/12/2021	6.43
	8/4/2021	3.5
	8/24/2021	7.0
	9/24/2021	4.2
	11/23/2021	6.38
	2/22/2022	0.47
	6/14/2022	3.87
	8/25/2022	2.6
11/16/2022	8.12	
MW-09	3/1/2021	0.86
	4/10/2021	6.91
	4/25/2021	2.08
	5/25/2021	14.12
	6/11/2021	2.39
	6/29/2021	2.97
	7/12/2021	3.94
	8/4/2021	0.0
	8/25/2021	19.9
	9/24/2021	3.67
	11/23/2021	19.07
	2/22/2022	0.59
	6/15/2022	113.77
	8/25/2022	1.93
11/16/2022	11.73	
MW-10	2/25/2021	172.14
	4/10/2021	29.99
	4/25/2021	34.77
	5/25/2021	44.14
	6/11/2021	92.03
	6/29/2021	29.35
	7/12/2021	23.45
	8/4/2021	47.68
	8/26/2021	27.5
	9/24/2021	542
	11/23/2021	312.05
	2/24/2022	72.18
	6/14/2022	55.5
	8/25/2022	8.83
11/16/2022	32.4	
MW-11	4/10/2021	269.25
	4/25/2021	60.28
	5/25/2021	9.56
	6/11/2021	77.09
	6/29/2021	7.43
	7/12/2021	39.12
	8/4/2021	9.53
	8/26/2021	11.4
	9/24/2021	9.68
	11/23/2021	1.85
	2/23/2022	162.43
	6/13/2022	27.05
	8/23/2022	10.9
	11/16/2022	60.3
MW-12	4/10/2021	31.67
	4/25/2021	15.04
	5/25/2021	28.65
	6/11/2021	6.1
	6/29/2021	13.04
	7/12/2021	12.99
	8/4/2021	11.97
	8/26/2021	10.9
	9/24/2021	11.97
	11/23/2021	3.88
	2/24/2022	82.8
	6/13/2022	4.24
	8/23/2022	7.35
	11/16/2022	2.85

Table 3. Proposed Site-Specific Groundwater Protection Standards - Will County Station Ponds 2S/3S.

Upgradient Well(s)	Parameter	Section 845.600 Standards	Interwell Background Prediction Limit	Proposed GWPS
MW-05 and MW-06	Antimony	0.006	0.003	0.006
MW-05 and MW-06	Arsenic	0.01	0.005	0.01
MW-06*	Barium*	2.0	0.109	2.0
MW-05 and MW-06	Beryllium	0.004	0.001	0.004
MW-06*	Boron*	2.0	4.739	4.739
MW-05 and MW-06	Cadmium	0.005	0.0005	0.005
MW-05 and MW-06*	Chloride*	200	166	200
MW-05 and MW-06	Chromium	0.1	0.0005	0.1
MW-05 and MW-06	Cobalt	0.006	0.001	0.006
MW-05 and MW-06	Combined Radium 226 + 228 (pCi/L)	5.0	0.601	5.0
MW-05	Fluoride	4.0	0.820	4.0
MW-05 and MW-06	Lead	0.0075	0.0005	0.0075
MW-05 and MW-06	Lithium	0.04	0.020	0.04
MW-05 and MW-06	Mercury	0.002	0.0002	0.002
MW-05	Molybdenum	0.10	0.172	0.172
MW-05	pH (standard units)	6.5-9.0	6.7-9.4	6.5-9.4
MW-05	Selenium	0.05	0.056	0.056
MW-05*	Sulfate*	400	1053	1053
MW-05 and MW-06	Thallium	0.002	0.002	0.002
MW-06*	Total Dissolved Solids*	1200	988	1200
MW-05	Calcium	NE	313.4	313.4
MW-05	Turbidity (NTU)	NE	6.33	6.33

All values are in mg/L (ppm) unless otherwise noted.

* - Limited to original 8 background samples.

NE - Not Established

Bold - Proposed Site-specific Groundwater Protection Standard based on Section 845.600(a)(2)

Table 4. Groundwater Elevations - Midwest Generation, LLC, Will County Station, Romeoville, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TOC)	Groundwater Elevation (ft above MSL)
MW-05	11/9/2015	592.87	9.99	582.88
	2/16/2016	592.87	9.91	582.96
	5/24/2016	592.87	9.94	582.93
	8/9/2016	592.87	10.09	582.78
	10/25/2016	592.87	9.02	583.85
	1/31/2017	592.87	9.81	583.06
	5/9/2017	592.87	9.63	583.24
	6/27/2017	592.87	10.26	582.61
	9/6/2017	592.87	10.48	582.39
	11/16/2017	592.87	10.02	582.85
	2/28/2018	592.87	9.48	583.39
	5/1/2018	592.87	9.94	582.93
	10/2/2018	592.87	10.64	582.23
	5/28/2019	592.87	8.73	584.14
	12/5/2019	592.87	9.92	582.95
	5/22/2020	592.87	9.39	583.48
	11/3/2020	592.87	10.48	582.39
	5/24/2021	592.87	10.21	582.66
	11/19/2021	592.87	10.25	582.62
	1/19/2022	592.87	10.54	582.33
	2/10/2022	592.87	10.85	582.02
	3/14/2022	592.87	9.90	582.97
	4/6/2022	592.87	9.59	583.28
	5/23/2022	592.87	10.06	582.81
6/29/2022	592.87	10.68	582.19	
7/19/2022	592.87	10.40	582.47	
8/23/2022	592.87	10.26	582.61	
9/20/2022	592.87	10.17	582.70	
10/13/2022	592.87	11.09	581.78	
11/15/2022	592.87	10.66	582.21	
12/19/2022	592.87	9.96	582.91	
MW-06	11/9/2015	593.18	9.96	583.22
	2/16/2016	593.18	11.37	581.81
	5/24/2016	593.18	11.37	581.81
	8/9/2016	593.18	11.54	581.64
	10/25/2016	593.18	11.37	581.81
	1/31/2017	593.18	11.24	581.94
	5/9/2017	593.18	10.86	582.32
	6/27/2017	593.18	11.55	581.63
	9/6/2017	593.18	11.77	581.41
	11/16/2017	593.18	11.49	581.69
	2/28/2018	593.18	10.91	582.27
	5/1/2018	593.18	11.47	581.71
	10/2/2018	593.18	11.89	581.29
	5/28/2019	593.18	10.18	583.00
	12/5/2019	593.18	11.51	581.67
	5/22/2020	593.18	10.55	582.63
	11/3/2020	593.18	11.86	581.32
	5/24/2021	593.18	11.85	581.33
	11/19/2021	593.18	11.85	581.33
	1/19/2022	593.18	12.07	581.11
	2/10/2022	593.18	12.20	580.98
	3/14/2022	593.18	11.61	581.57
	4/6/2022	593.18	11.07	582.11
	5/23/2022	593.18	11.62	581.56
6/29/2022	593.18	12.21	580.97	
7/19/2022	593.18	11.88	581.30	
8/23/2022	593.18	12.57	580.61	
9/20/2022	593.18	11.78	581.40	
10/13/2022	593.18	12.37	580.81	
11/15/2022	593.18	12.14	581.04	
12/19/2022	593.18	11.53	581.65	

Table 4. Groundwater Elevations - Midwest Generation, LLC, Will County Station, Romeoville, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TOC)	Groundwater Elevation (ft above MSL)
MW-09	11/9/2015	592.87	11.38	581.49
	2/16/2016	592.87	11.03	581.84
	5/24/2016	592.87	11.35	581.52
	8/9/2016	592.87	11.43	581.44
	10/25/2016	592.87	10.74	582.13
	1/31/2017	592.87	11.15	581.72
	5/9/2017	592.87	10.45	582.42
	6/27/2017	592.87	11.66	581.21
	9/6/2017	592.87	11.95	580.92
	11/14/2017	592.87	11.54	581.33
	2/27/2018	592.87	10.13	582.74
	5/1/2018	592.87	11.39	581.48
	10/2/2018	592.87	11.91	580.96
	5/28/2019	592.87	9.65	583.22
	12/5/2019	592.87	11.17	581.70
	5/26/2020	592.87	9.67	583.20
	11/3/2020	592.87	11.90	580.97
	5/25/2021	592.87	12.02	580.85
	11/19/2021	592.87	11.84	581.03
	1/19/2022	592.87	12.04	580.83
	2/10/2022	592.87	12.12	580.75
	3/14/2022	592.87	11.48	581.39
	4/6/2022	592.87	10.46	582.41
	5/23/2022	592.87	11.22	581.65
	6/29/2022	592.87	12.20	580.67
	7/19/2022	592.87	11.86	581.01
	8/23/2022	592.87	11.59	581.28
	9/20/2022	592.87	11.39	581.48
	10/13/2022	592.87	11.97	580.90
	11/15/2022	592.87	12.25	580.62
12/19/2022	592.87	11.34	581.53	
MW-10	11/9/2015	590.96	10.65	580.31
	2/16/2016	590.96	10.43	580.53
	5/24/2016	590.96	10.72	580.24
	8/9/2016	590.96	11.12	579.84
	10/25/2016	590.96	10.73	580.23
	1/31/2017	590.96	10.37	580.59
	5/9/2017	590.96	9.78	581.18
	6/27/2017	590.96	11.09	579.87
	9/6/2017	590.96	11.20	579.76
	11/15/2017	590.96	10.76	580.20
	2/27/2018	590.96	9.54	581.42
	5/1/2018	590.96	10.64	580.32
	10/2/2018	590.96	11.12	579.84
	5/28/2019	590.96	9.02	581.94
	12/5/2019	590.96	10.28	580.68
	5/27/2020	590.96	8.89	582.07
	11/3/2020	590.96	10.68	580.28
	5/24/2021	590.96	11.06	579.90
	11/19/2021	590.96	10.72	580.24
	1/19/2022	590.96	11.00	579.96
	2/10/2022	590.96	10.95	580.01
	3/14/2022	590.96	10.57	580.39
	4/6/2022	590.96	9.74	581.22
	5/23/2022	590.96	8.99	581.97
	6/29/2022	590.96	11.50	579.46
	7/19/2022	590.96	11.03	579.93
	8/23/2022	590.96	10.86	580.10
	9/20/2022	590.96	10.35	580.61
	10/13/2022	590.96	11.06	579.90
	11/15/2022	590.96	11.15	579.81
12/19/2022	590.96	10.02	580.94	

Table 4. Groundwater Elevations - Midwest Generation, LLC, Will County Station, Romeoville, IL

Well ID	Date	Top of Casing Elevation (ft above MSL)	Depth to Groundwater (ft below TOC)	Groundwater Elevation (ft above MSL)
MW-11	11/9/2015	590.69	10.28	580.41
	2/16/2016	590.69	10.15	580.54
	5/24/2016	590.69	10.25	580.44
	8/9/2016	590.69	10.66	580.03
	10/25/2016	590.69	10.42	580.27
	1/31/2017	590.69	9.91	580.78
	5/9/2017	590.69	9.21	581.48
	6/27/2017	590.69	10.48	580.21
	9/6/2017	590.69	10.73	579.96
	11/15/2017	590.69	10.43	580.26
	5/1/2018	590.69	10.18	580.51
	10/2/2018	590.69	10.59	580.10
	5/28/2019	590.69	8.32	582.37
	12/5/2019	590.69	9.85	580.84
	5/26/2020	590.69	8.09	582.60
	11/3/2020	590.69	10.58	580.11
	5/24/2021	590.69	10.76	579.93
	8/23/2021	590.69	10.75	579.94
	11/19/2021	590.69	10.60	580.09
	1/19/2022	590.69	10.67	580.02
	2/10/2022	590.69	11.21	579.48
	3/14/2022	590.69	10.24	580.45
	4/6/2022	590.69	9.14	581.55
	5/23/2022	590.69	9.72	580.97
6/29/2022	590.69	11.00	579.69	
7/19/2022	590.69	10.44	580.25	
8/23/2022	590.69	10.35	580.34	
9/20/2022	590.69	9.82	580.87	
10/13/2022	590.69	10.44	580.25	
11/15/2022	590.69	10.92	579.77	
12/19/2022	590.69	9.77	580.92	
MW-12	11/9/2015	590.81	10.15	580.66
	2/16/2016	590.81	10.24	580.57
	5/24/2016	590.81	10.31	580.50
	8/9/2016	590.81	10.73	580.08
	10/25/2016	590.81	10.45	580.36
	1/31/2017	590.81	10.16	580.65
	5/9/2017	590.81	9.88	580.93
	6/27/2017	590.81	10.62	580.19
	9/6/2017	590.81	10.61	580.20
	11/15/2017	590.81	10.20	580.61
	5/1/2018	590.81	10.30	580.51
	10/2/2018	590.81	10.77	580.04
	5/28/2019	590.81	9.17	581.64
	12/5/2019	590.81	10.15	580.66
	5/22/2020	590.81	9.88	580.93
	11/3/2020	590.81	10.49	580.32
	5/24/2021	590.81	10.65	580.16
	8/23/2021	590.81	11.05	579.76
	11/19/2021	590.81	10.48	580.33
	1/19/2022	590.81	10.63	580.18
	2/10/2022	590.81	10.65	580.16
	3/14/2022	590.81	10.24	580.57
	4/6/2022	590.81	9.83	580.98
	5/23/2022	590.81	10.18	580.63
6/29/2022	590.81	11.15	579.66	
7/19/2022	590.81	10.62	580.19	
8/23/2022	590.81	10.34	580.47	
9/20/2022	590.81	10.22	580.59	
10/13/2022	590.81	10.78	580.03	
11/15/2022	590.81	10.77	580.04	
12/19/2022	590.81	9.97	580.84	

MSL - Mean Sea Level
TOC - Top of Casing

Table 5. Groundwater Flow Direction and Estimated Seepage Velocity/Flow Rate - Will County Generation Station. Ponds 2S and 3S.

DATE	Groundwater Flow Direction	Kavg (ft/sec)*	Average Hydraulic Gradient (ft/ft)	Porosity (unitless)**	Estimated Seepage Velocity (ft/day)
1/19/2022	West	2.315E-04	0.0064	0.2	0.64
2/10/2022	West	2.315E-04	0.0041	0.2	0.41
3/14/2022	West	2.315E-04	0.0052	0.2	0.52
4/6/2022	West	2.315E-04	0.0042	0.2	0.42
5/23/2022	West	2.315E-04	0.0050	0.2	0.50
6/29/2022	West	2.315E-04	0.0047	0.2	0.47
7/19/2022	West	2.315E-04	0.0043	0.2	0.43
8/23/2022	West	2.315E-04	0.0039	0.2	0.39
9/20/2022	West	2.315E-04	0.0047	0.2	0.47
10/13/2022	West	2.315E-04	0.0047	0.2	0.47
11/15/2022	West	2.315E-04	0.0043	0.2	0.43
12/19/2022	West	2.315E-04	0.0075	0.2	0.75

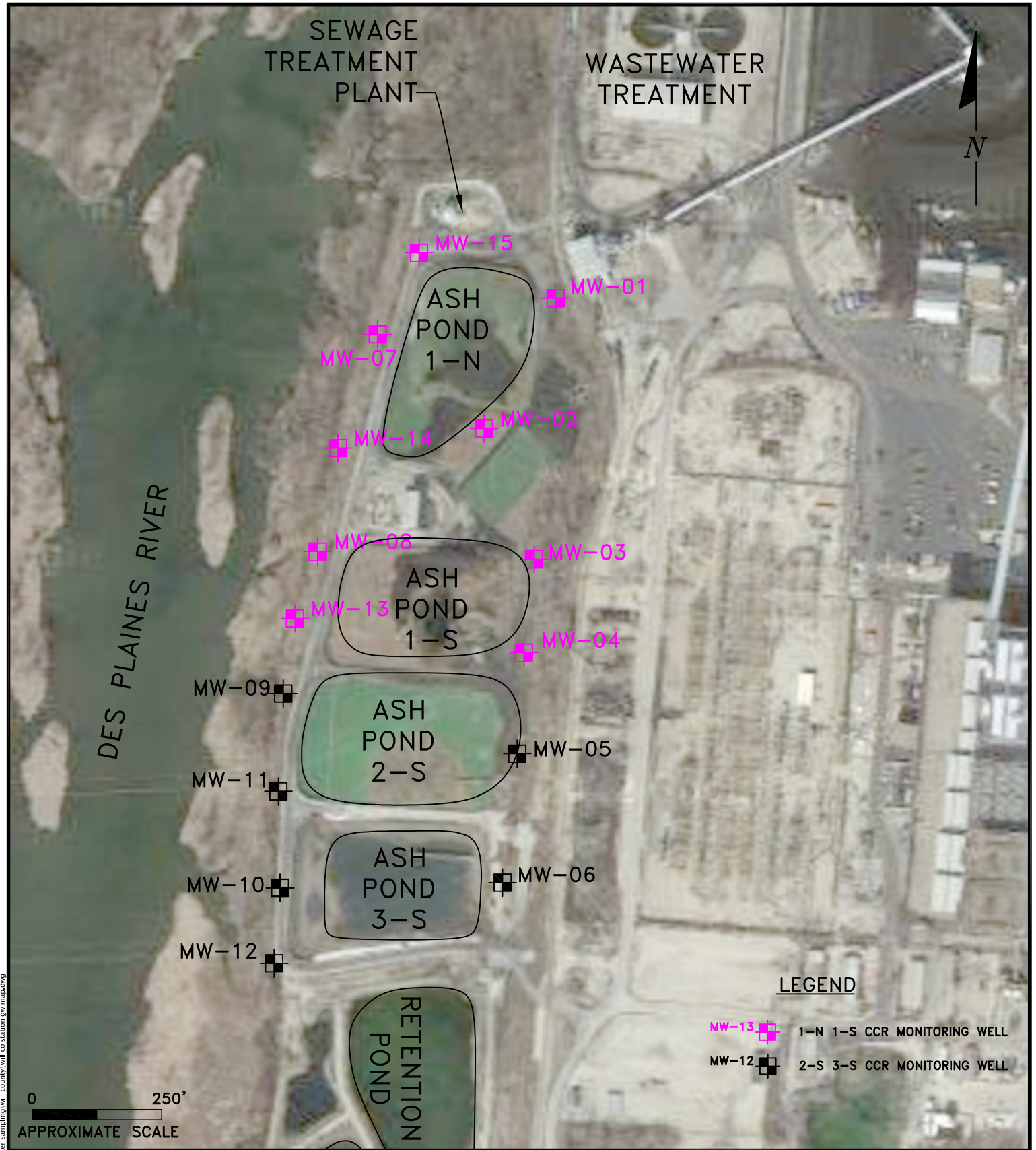
* Kavg - K values from re-evaluation of slug test data as part of groundwater modeling in support of Application for Construction Permit per Illinois State CCR Rule.

** - Porosity estimate from Groundwater, Freeze and Cherry, 1979.

Table 6. CCR Groundwater Sample Collection Summary for 2022 - Will County Generating Station Ponds 2S/3S

Well ID	Number of Groundwater Sampling Events	Dates Groundwater Sampling Events
MW-05 (Upgradient)	4	2/24/2022
		6/16/2022
		8/25/2022
		11/15/2022
MW-06 (Upgradient)	4	2/22/2022
		6/14/2022
		8/25/2022
		11/15/2022
MW-09 (Downgradient)	4	2/22/2022
		6/15/2022
		8/25/2022
		11/16/2022
MW-10 (Downgradient)	4	2/24/2022
		6/14/2022
		8/25/2022
		11/16/2022
MW-11 (Downgradient)	4	2/23/2022
		6/13/2022
		8/23/2022
		11/16/2022
MW-12 (Downgradient)	4	2/24/2022
		6/13/2022
		8/23/2022
		11/16/2022

FIGURES



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ENVIRONMENTAL CONSULTATION & REMEDIATION

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

SITE MAP

WILL COUNTY STATION
ROMEOLVILLE, ILLINOIS

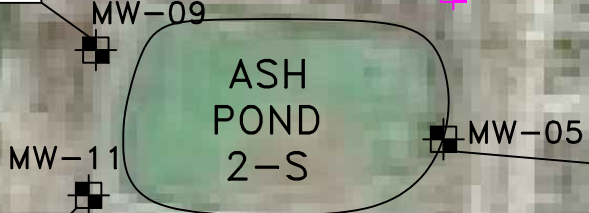
Scale: 1" = 250' Date: January 18, 2022

KPRG Project No. 12313.3

FIGURE 1

SEWAGE
TREATMENT
PLANT

WASTEWATER
TREATMENT



MW-09	
PARAMETER	RESULT
CHLORIDE	210

MW-11	
PARAMETER	RESULT
ARSENIC	0.013

MW-05	
PARAMETER	RESULT
BORON	8.9
ARSENIC	0.032
SELENIUM	0.089

MW-10	
PARAMETER	RESULT
ARSENIC	0.015

NOTE:
RESULTS ARE IN MILLIGRAMS PER LITER (mg/L).

LEGEND:

- MW-13 1-N 1-S CCR MONITORING WELL
- MW-12 2-S 3-S CCR MONITORING WELL

0 250'
APPROXIMATE SCALE

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**4Q22 AREAL DISTRIBUTION MAP OF
PARAMETERS ABOVE PROPOSED GWPSs**

WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS

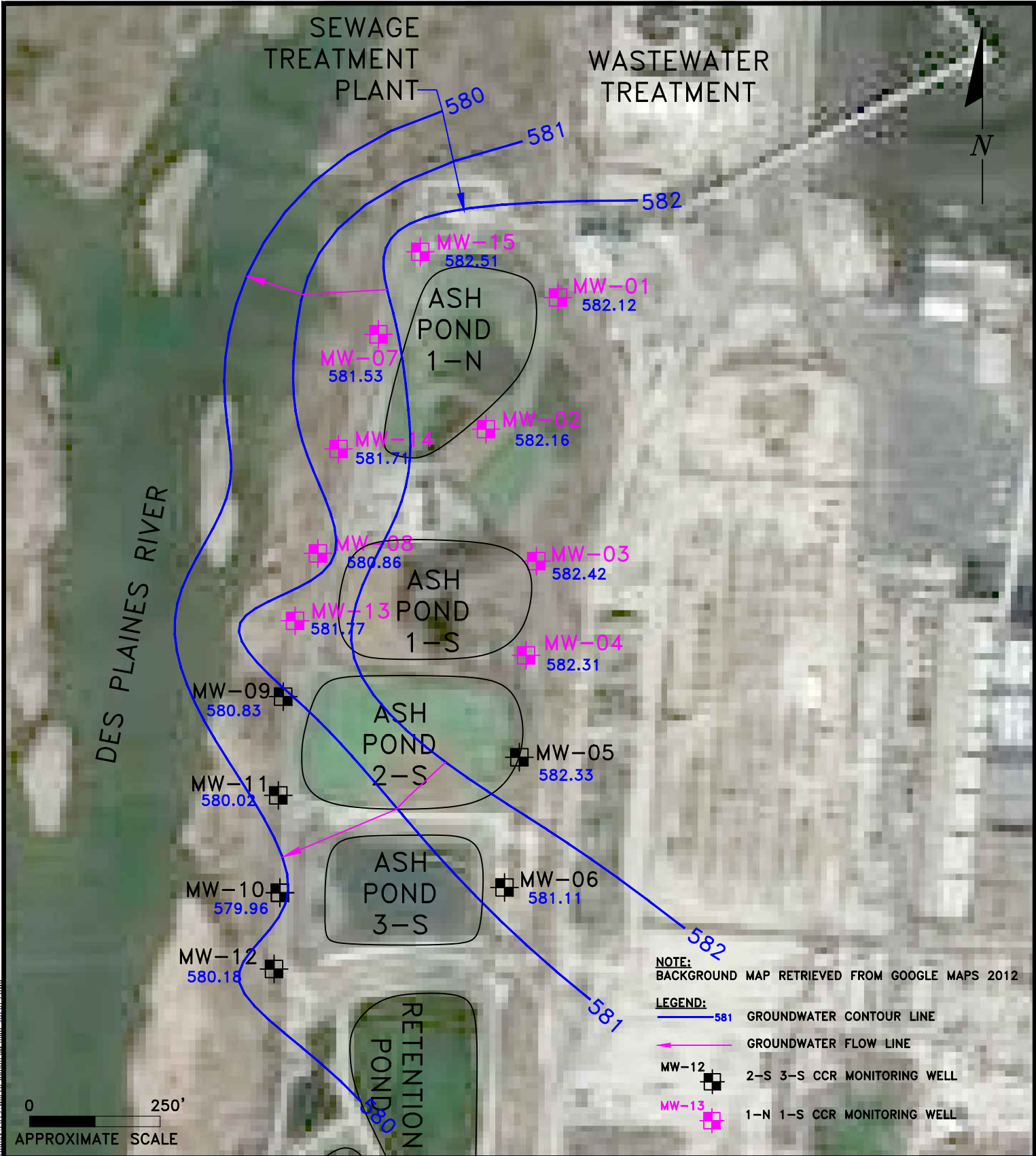
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KPRG Project No. 12313.3

Figure 2

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ATTACHMENT 1
Monthly Potentiometric Maps



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POTENTIOMETRIC MAP 01/2022

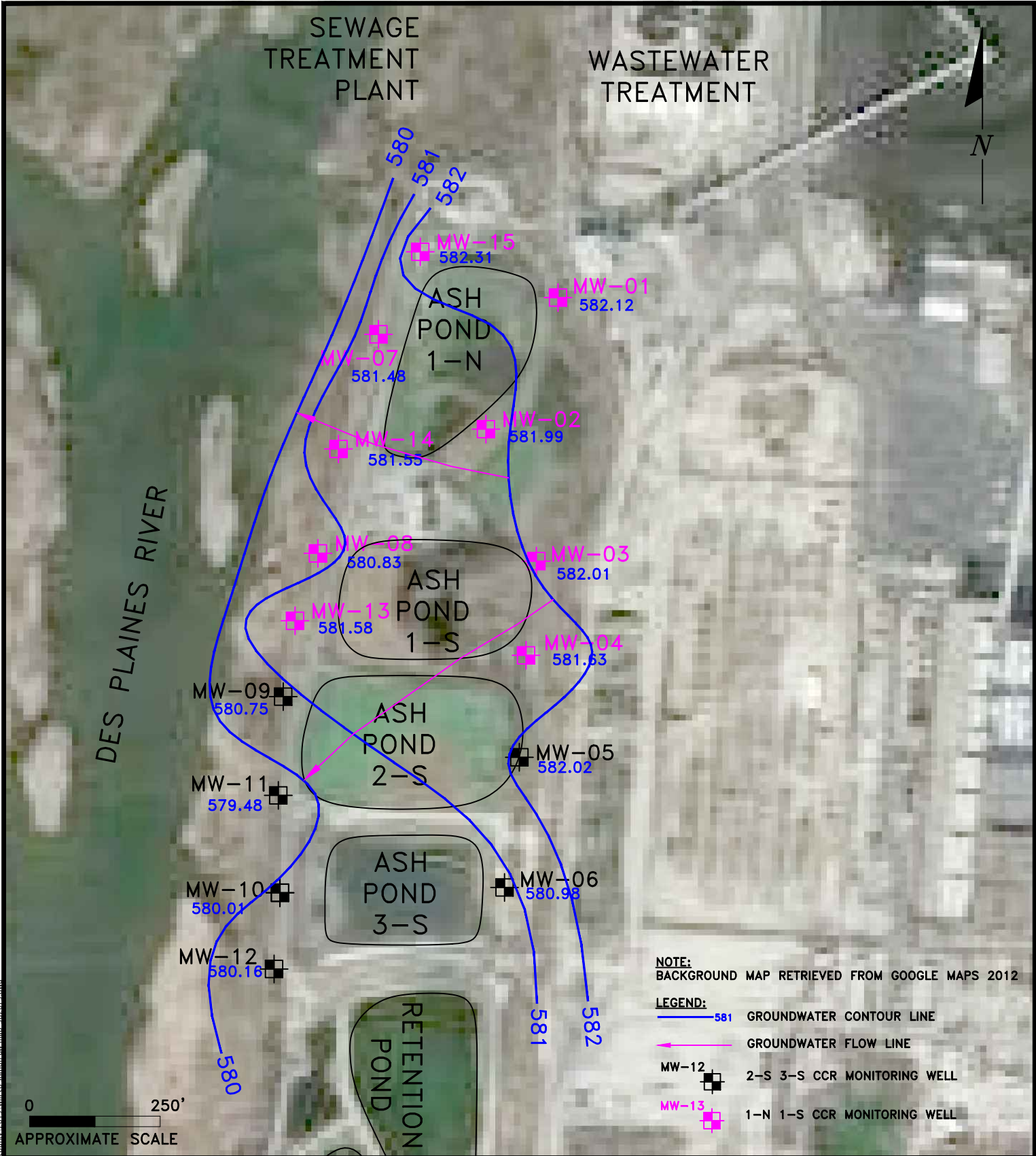
**WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS**

Scale: 1" = 250'

Date: April 13, 2022

KPRG Project No. 12313.3

ATTACHMENT 1



NOTE:
BACKGROUND MAP RETRIEVED FROM GOOGLE MAPS 2012

- LEGEND:
- 581 GROUNDWATER CONTOUR LINE
 - GROUNDWATER FLOW LINE
 - MW-12 2-S 3-S CCR MONITORING WELL
 - MW-13 1-N 1-S CCR MONITORING WELL

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POTENTIOMETRIC MAP 02/2022

WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS

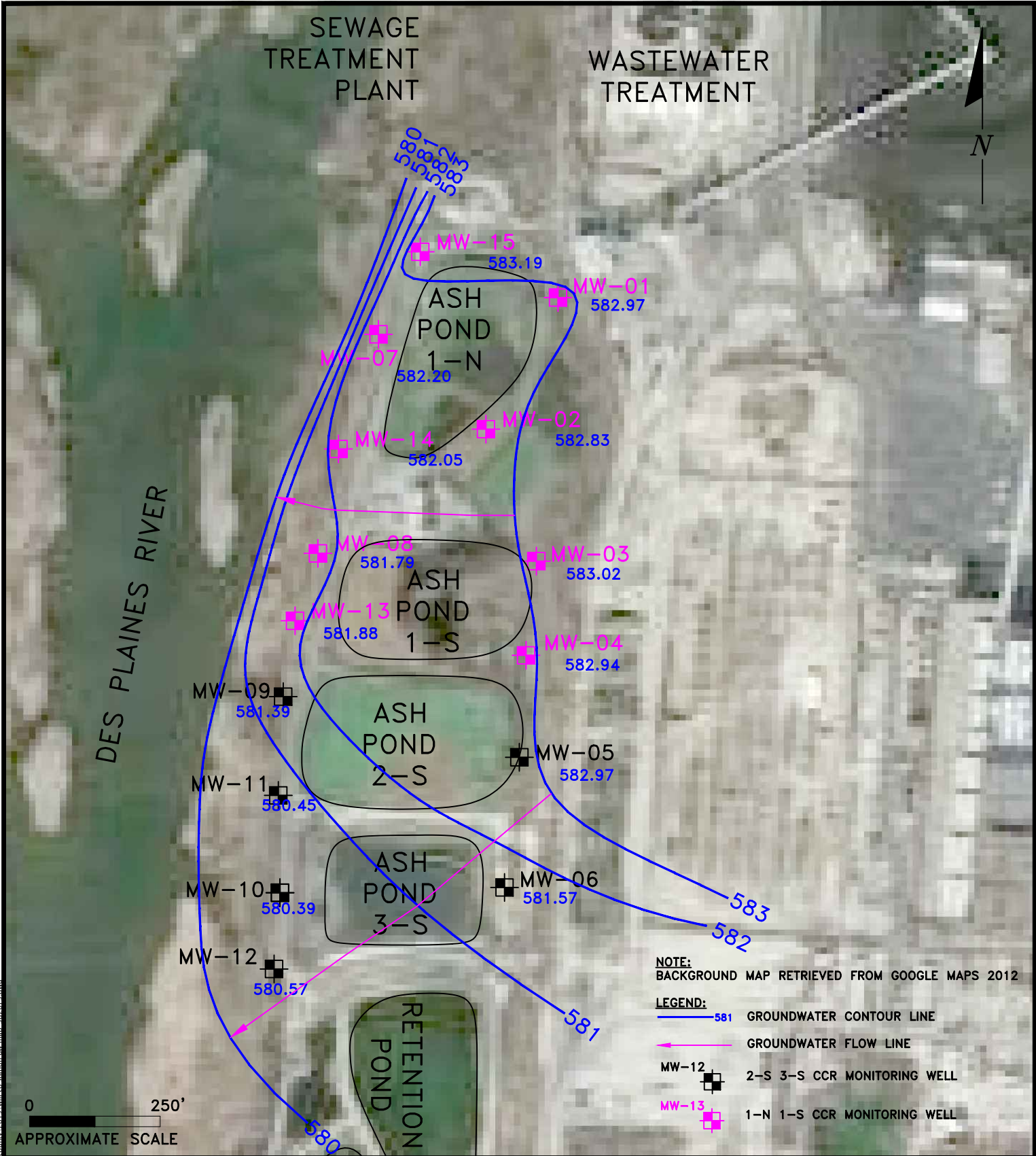
Scale: 1" = 250'

Date: April 13, 2022

KPRG Project No. 12313.3

ATTACHMENT 1

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

POTENTIOMETRIC MAP 03/2022

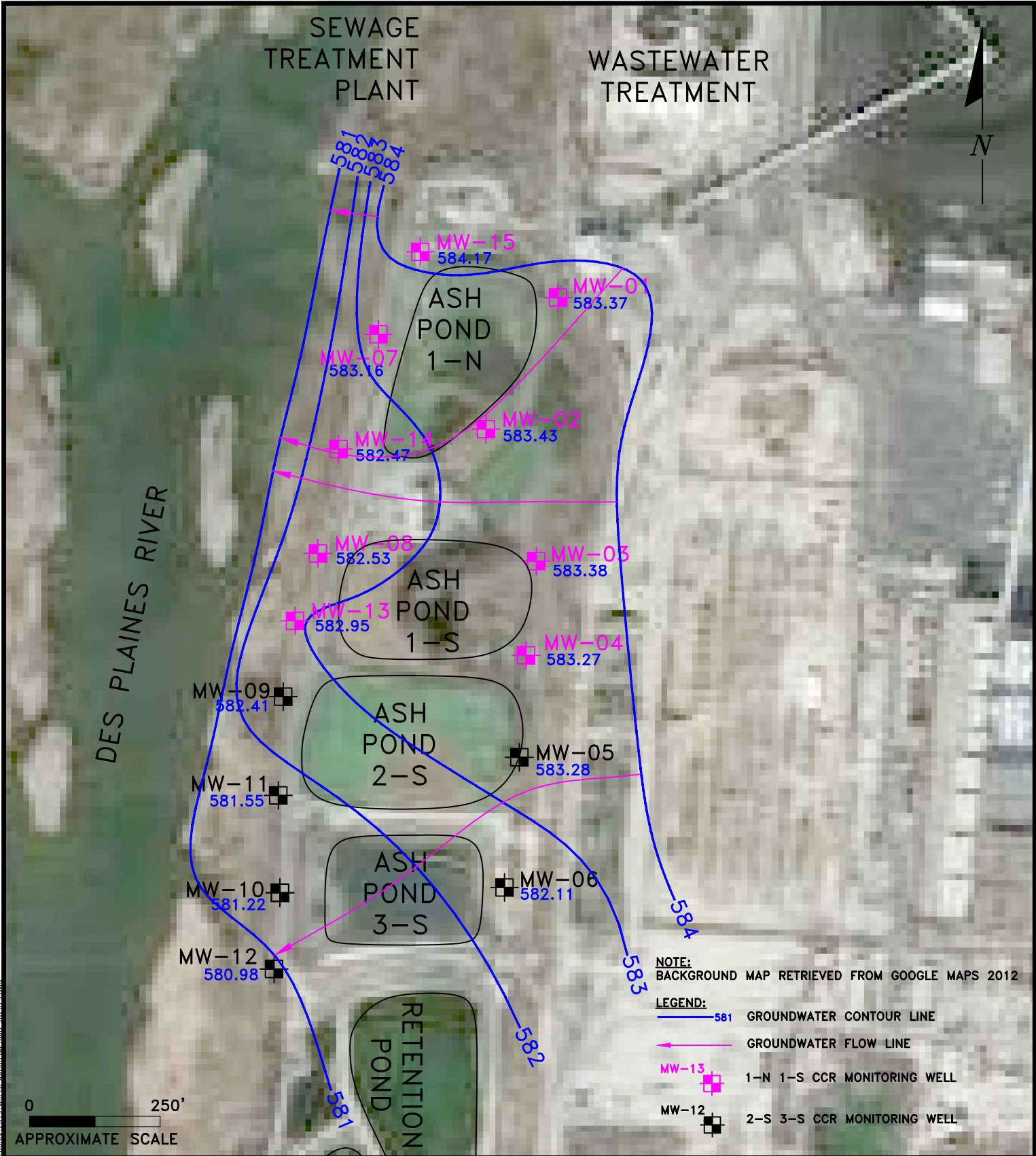
WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS

Scale: 1" = 250'

Date: April 13, 2022

KPRG Project No. 12313.3

ATTACHMENT 1



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

POTENTIOMETRIC MAP 04/2022

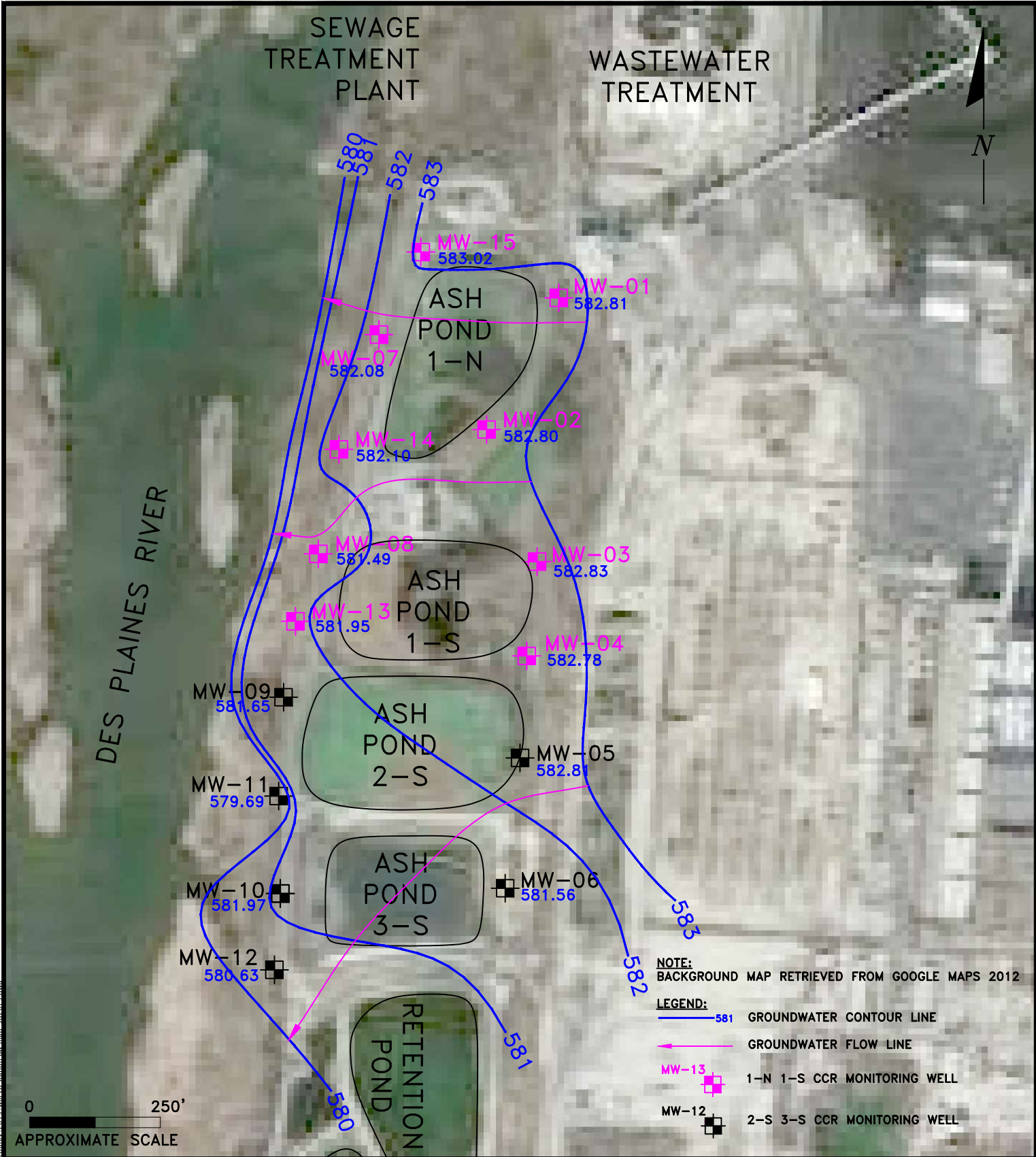
WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS

Scale: 1" = 250'

Date: May 09, 2022

KPRG Project No. 12313.3

ATTACHMENT 1



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

POTENTIOMETRIC MAP 05/2022

WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS

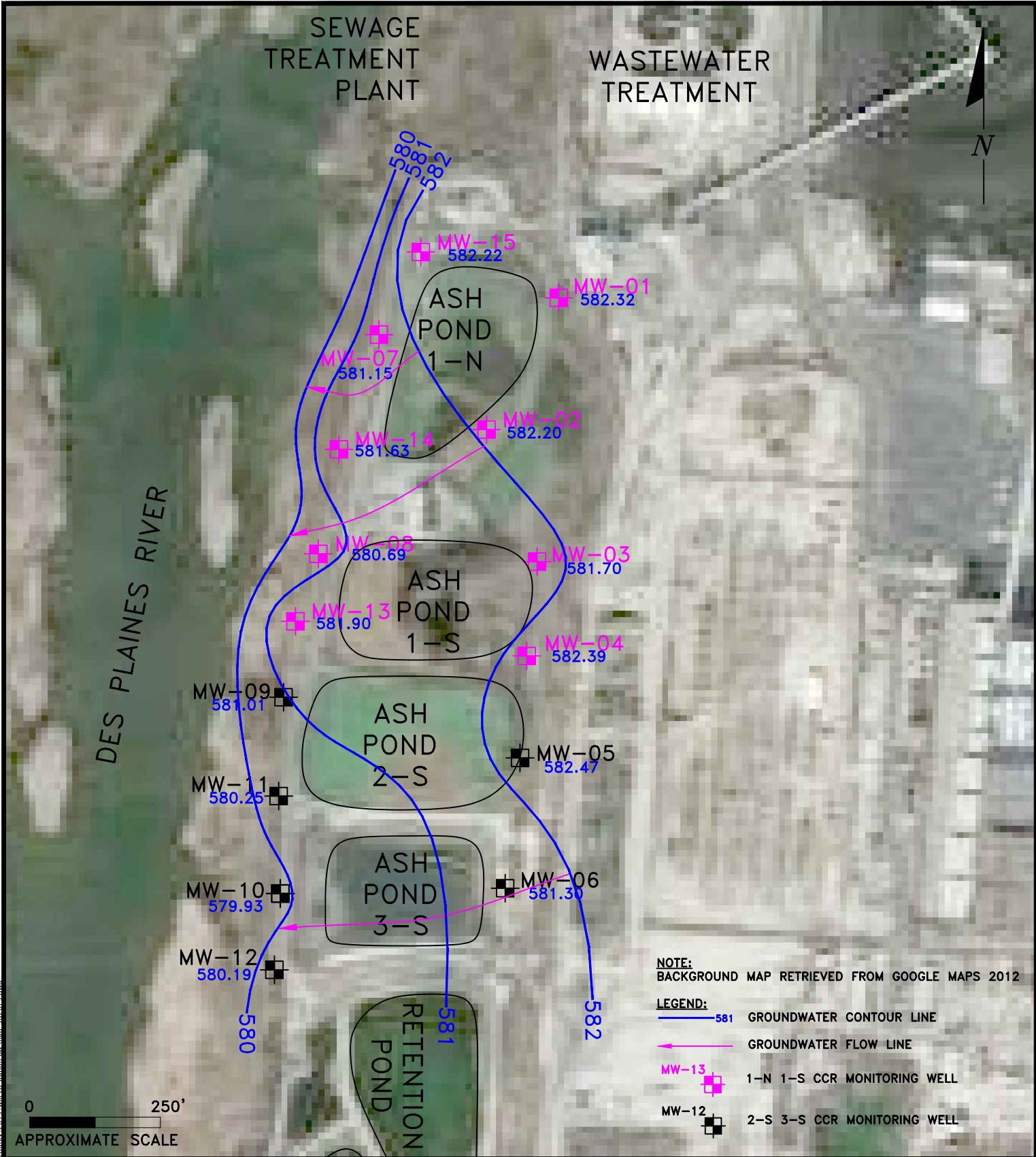
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Date: July 28, 2022

KPRG Project No. 12313.3

ATTACHMENT 1

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ENVIRONMENTAL CONSULTATION & REMEDIATION

K P R G

KPRG and Associates, inc.

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

POTENTIOMETRIC MAP 07/2022

WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS

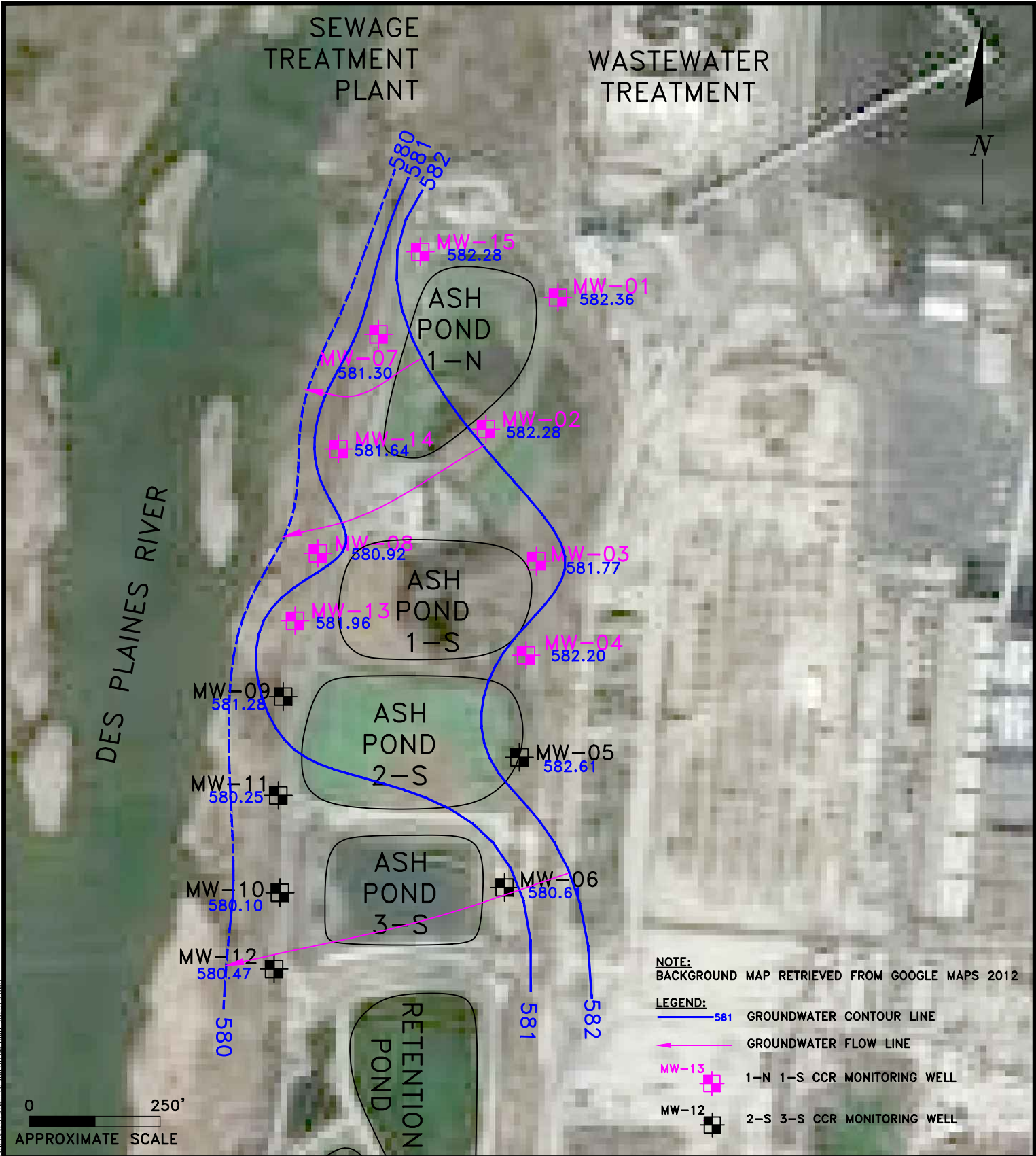
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KPRG Project No. 12313.3

ATTACHMENT 1

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ENVIRONMENTAL CONSULTATION & REMEDIATION

K P R G

KPRG and Associates, inc.

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

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

POTENTIOMETRIC MAP 08/2022

WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS

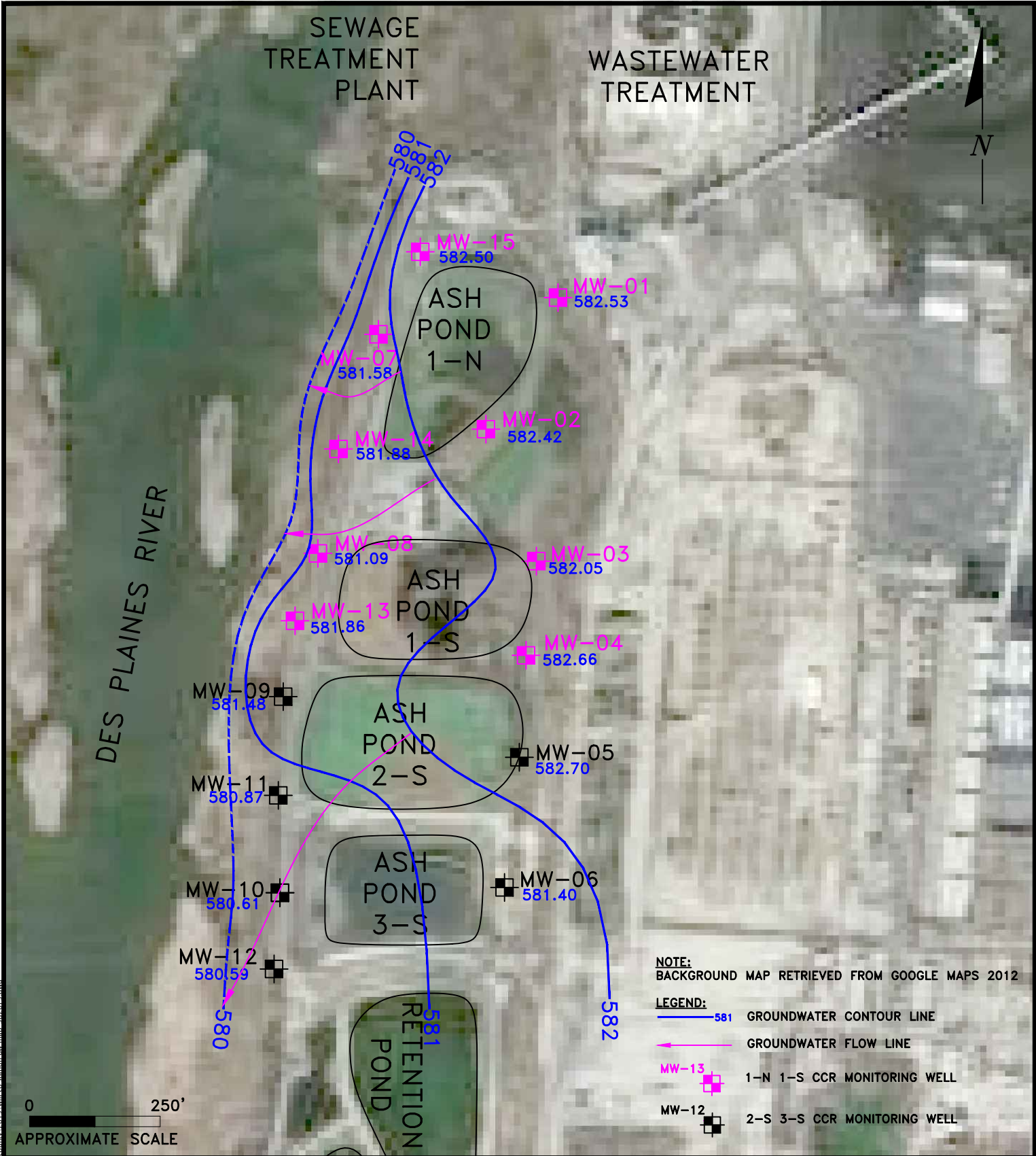
Scale: 1" = 250'

Date: October 14, 2022

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 09/2022

WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS

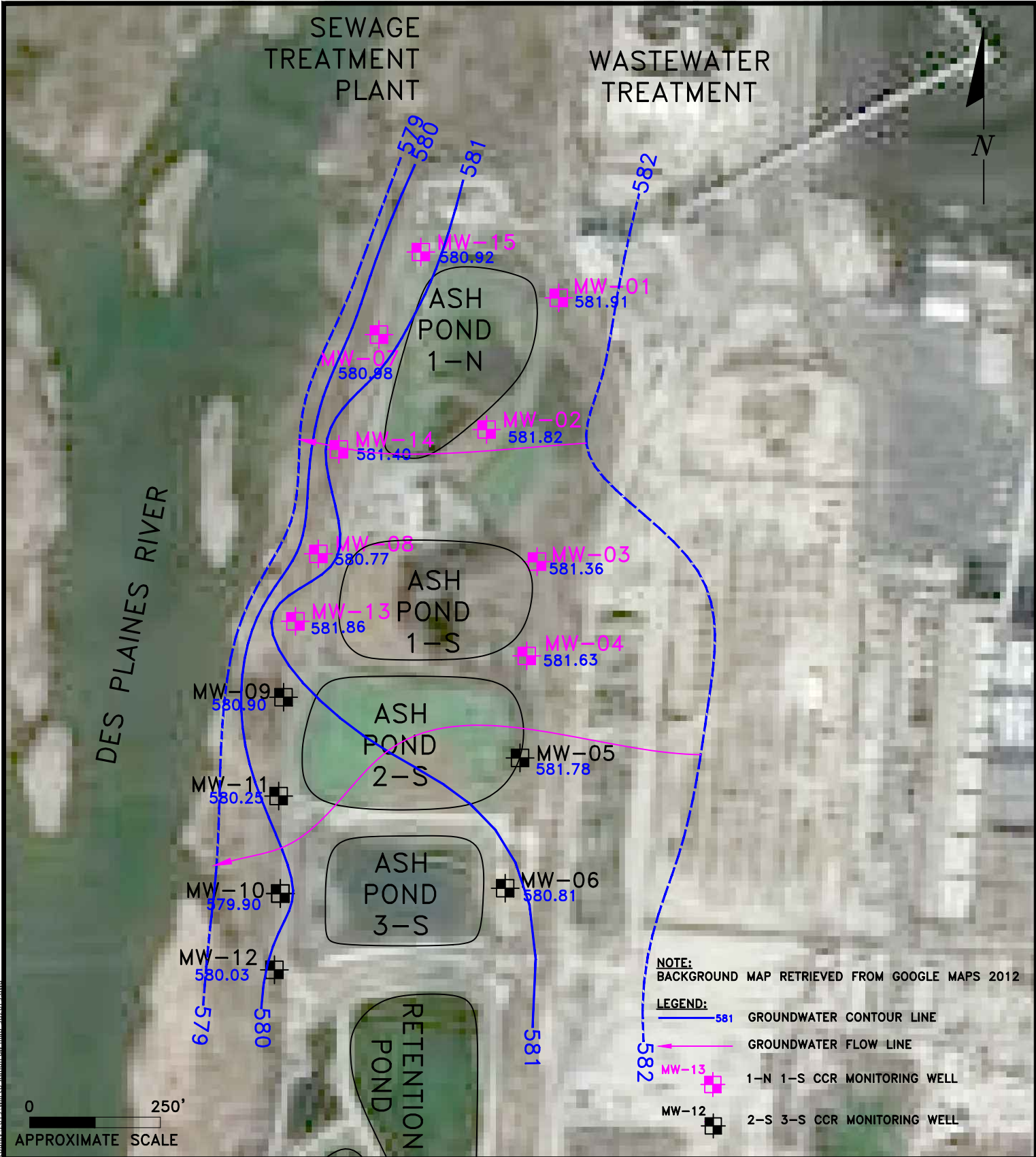
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Date: November 1, 2022

KPRG Project No. 12313.3

ATTACHMENT 1

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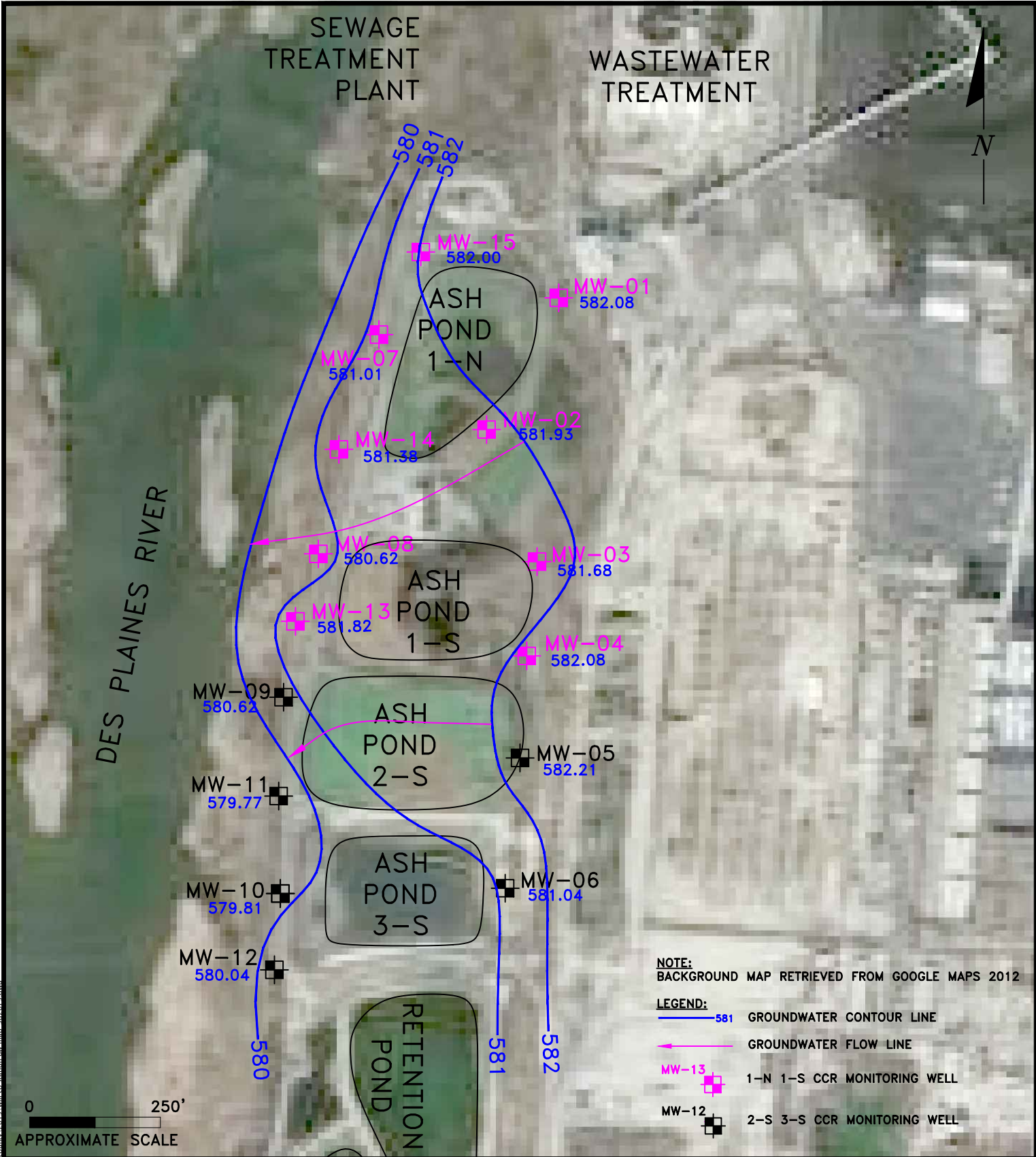
414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

POTENTIOMETRIC MAP 10/2022

**WILL COUNTY STATION, PONDS 2-S 3-S,
 ROMEOVILLE, ILLINOIS**

Scale: 1" = 250' Date: November 2, 2022

KPRG Project No. 12313.3 ATTACHMENT 1



NOTE:
BACKGROUND MAP RETRIEVED FROM GOOGLE MAPS 2012

- LEGEND:**
- 581 GROUNDWATER CONTOUR LINE
 - GROUNDWATER FLOW LINE
 - MW-13 1-N 1-S CCR MONITORING WELL
 - MW-12 2-S 3-S CCR MONITORING WELL

ENVIRONMENTAL CONSULTATION & REMEDIATION

POTENTIOMETRIC MAP 11/2022

WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS



KPRG and Associates, inc.

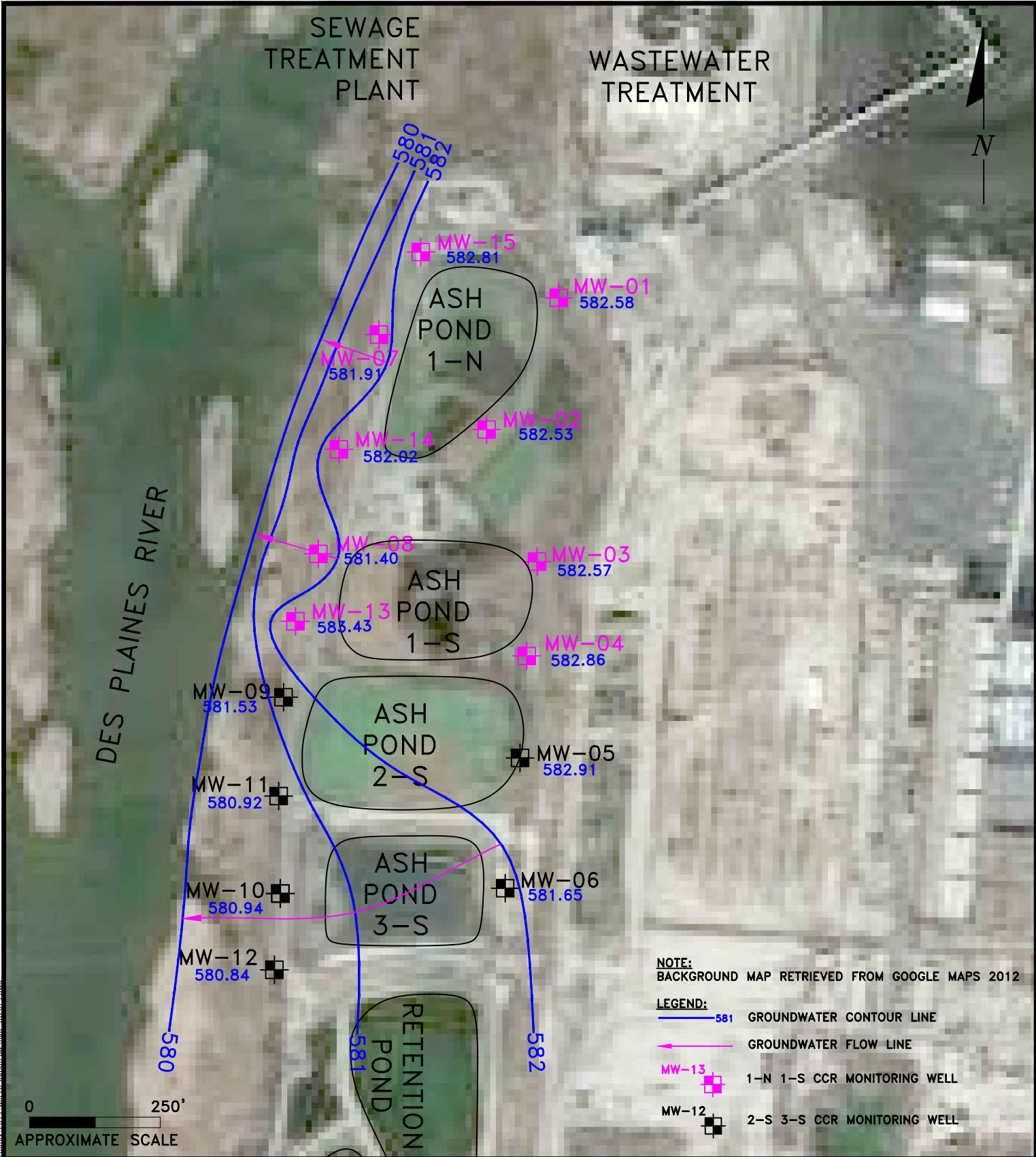
Scale: 1" = 250' Date: December 27, 2022

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KPRG Project No. 12313.3 ATTACHMENT 1

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POTENTIOMETRIC MAP 12/2022

**WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS**

Scale: 1" = 250'

Date: January 3, 2023

KPRG Project No. 12313.3

ATTACHMENT 1

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ATTACHMENT D
2022 MONTHLY SURFACE
IMPOUNDMENT WATER ELEVATIONS

Monthly Surface Impoundment Water Elevations
 Midwest Generation, LLC, Will County Station, Romeoville, IL

Well ID	Date	Basin Gauge Level (ft)	Basin Surface Elevation (ft above MSL)
Pond 2S	2/10/2022	2.3	590.6
	3/14/2022	1.3	589.6
	4/6/2022	1.3	589.6
	5/23/2022	1.4	589.7
	6/29/2022	1.3	589.6
	7/19/2022	1.3	589.6
	9/1/2022	1.3	589.6
	9/20/2022	1.3	589.6
	10/13/2022	1.3	589.6
	11/15/2022	1.1	589.4
	12/19/2022	DRY	588.3
Pond 3S	2/10/2022	2.7	584.7
	3/14/2022	3.1	585.1
	4/6/2022	3.6	585.6
	5/23/2022	3.0	585
	6/29/2022	2.7	584.7
	7/19/2022	2.7	584.7
	8/23/2022	1.6	583.6
	9/20/2022	1.8	583.8
	10/13/2022	1.5	583.5
	11/15/2022	1.7	583.7
	12/19/2022	1.9	583.9