

TRANSMITTAL

To: 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

From: Midwest Generation, LLC Will County Station

Date: January 30, 2024

**Re: Midwest Generation, LLC – Will County Station
Account No. W1978100011
CCR Surface Impoundment Annual Consolidated Report**

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

Pond ID	CCR Surface Impoundment Description
W1978100011-01	Pond 1N
W1978100011-02	Pond 1S
W1978100011-03	Pond 2S
W1978100011-04	Pond 3S

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

2023 ANNUAL CONSOLIDATED REPORT WILL COUNTY GENERATING STATION

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

ATTACHMENT A – ANNUAL CCR FUGITIVE DUST CONTROL REPORT

ATTACHMENT B – ANNUAL INSPECTION REPORT

ATTACHMENT B.1 – HAZARD POTENTIAL CLASSIFICATION ASSESSMENT
CERTIFICATION

ATTACHMENT B.2 – STRUCTURAL STABILITY AND SAFETY FACTOR
ASSESSMENT CERTIFICATION

ATTACHMENT B.3 – INFLOW DESIGN FLOOD CONTROL PLAN

ATTACHMENT C – ANNUAL GROUNDWATER MONITORING AND CORRECTIVE
ACTION REPORT

ATTACHMENT D – MONTHLY SURFACE IMPOUNDMENT WATER ELEVATIONS

ATTACHMENT A
2023 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 2023 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 South Ash Pond 2 and South Ash Pond 3

The Ash Ponds contain ash, all of which is below grade, which minimizes any potential fugitive dust emissions. Infrequently, when the ponds need 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.

2.2 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.

Annual CCR Fugitive Dust Control Report

Will County Generating Station

529 East 135th Street/Romeoville, Illinois

2.3 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 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.

2.4 Ash Transport Roadways

During CCR hauling activities, 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 2023.

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

Owner Representative/Responsible Person Contact Information:

Mr. Phillip Raush
Plant 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 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 2023.

5.0 Summary of Corrective Actions Taken

For the January through December 2023 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

April 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 First Quarter 2023 at Will County Generating Station. There were no complaints received from members of the public during the period January 1, 2023 through March 31, 2023.

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

July 13, 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 Second Quarter 2023 at Will County Generating Station. There were no complaints received from members of the public during the period April 1, 2023 through June 30, 2023.

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

Sincerely,

Phillip Raush
Plant Manager, Will County Generating Station



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

October 2, 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 Third Quarter 2023 at Will County Generating Station. There were no complaints received from members of the public during the period July 1, 2023 through September 30, 2023.

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 8, 2024

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

**Re: Midwest Generation, LLC – 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, 2023 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". The signature is written in a cursive, flowing style.

Phillip Raush
Plant Manager, Will County Generating Station

ATTACHMENT B
2023 ANNUAL INSPECTION REPORT

**ANNUAL INSPECTION REPORT
ASH PONDS 1N AND 1S
WILL COUNTY STATION
SEPTEMBER 2023**

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 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. Will County Station ceased operations on June 11, 2022. On September 8, 2023, 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 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 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, 2023

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 2023**

This annual inspection report has been prepared pursuant to both Title 35 of the Illinois Administrative Code (35 IAC) Part 845, Subpart E, Section 845.540(b) 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 inspection reports completed by a qualified person employed by Midwest Generation, LLC.
- CEC performed the annual inspection in accordance with the requirements of 35 IAC 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. Will County Station ceased operations on June 11, 2022. On September 8, 2023, 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. At the time of our inspection, both Pond 2S and 3S were inactive.

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 water levels gauges.

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 35 IAC 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:

A handwritten signature in blue ink that reads "M. Dean Jones".

Name: M. Dean Jones, P.E.

Date of Certification: September 30, 2023

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)	Less than 1 foot	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)	Less than 1 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
2023 ANNUAL HAZARD POTENTIAL
CLASSIFICATION CERTIFICATION

ponds are of similar construction, size, and age. Each pond is constructed with a concrete weir spillway along the west half. Gravel access roads are located along the sides of the ponds.

Table 1: Ash Pond Construction

Pond ID	Year of Original Construction	Dimension (ft x ft)	Depth (ft)	Capacity (ft ³)	Status
Pond 1N	1977	167 x 333	7	520,000	Closed
Pond 1S	1977	300 x 195	7	460,000	Closed

4.0 HAZARD CLASSIFICATION ASSESSMENT

Our annual inspection showed no physical modifications to Ponds 1N and 1S or to the surrounding area and no distress that would affect the operation and/or stability. The basis for this HPCA Report is that there have been no physical modifications or operational concerns that would change the results of the initial HPCA.

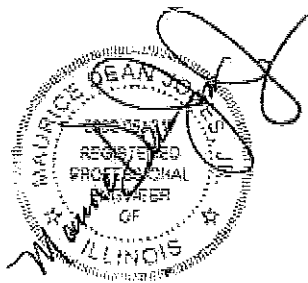
Based on the results of the annual inspection, review of the previous HPCA report, and the analysis provided in this report, Ponds 1N and 1S are classified as a Class 2 CCR impoundment because their failure would not result in probable loss of life but could result in impacts to the Des Plaines River creating potential economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.

5.0 LIMITATIONS AND CERTIFICATIONS

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

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

Seal:



Signature: _____

Name: M. Dean Jones, P.E.

Date of Certification: September 30, 2023

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2023

Enclosure: Figure 1 - Site Map

**Table 6-1 – 2023 Illinois Hazard Potential Classifications for
South Ash Pond 2 & South Ash Pond 3 at the Will County Generating Station**

CCR Surface Impoundment	2023 Illinois Hazard Potential Classification
South Ash Pond 2	Class 2
South Ash Pond 3	Class 2

However, as noted above, the 2023 hazard potential classifications for South Ash Ponds 2 and 3 do not reflect the probability of a hypothetical failure event associated with either pond and are not contingent upon the ponds' structural stabilities. Indeed, the 2023 annual safety factor assessment conducted pursuant to 35 Ill. Adm. Code 845.460 (Ref. 3) shows the South Ash Ponds 2 and 3 are structurally stable under design operating conditions.

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 13, 2023

Seal:



th. Dehlin
Thomas Dehlin
2023.10.13
12:27:33-05'00'

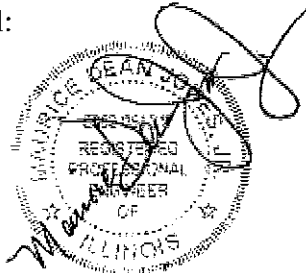
ATTACHMENT B.2
2023 ANNUAL STRUCTURAL STABILITY
AND SAFETY FACTOR ASSESSMENT
CERTIFICATION

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: *M. Dean Jones*
Name: M. Dean Jones, P.E.
Date of Certification: September 30, 2023
Illinois Professional Engineer No.: 062-051317
Expiration Date: November 30, 2023

**ATTACHMENT B.3
2023 ANNUAL INFLOW DESIGN FLOOD
CONTROL SYSTEM PLAN
CERTIFICATION**

6.0 CONCLUSIONS

Based on the results in Table 5-1, Will County's Pond 1N and Pond 1S have adequate hydraulic capacities to retain the 1,000-year flood event without water overtopping the former ponds' dikes. Therefore, Ponds 1N and 1S are able to collect and control the inflow design flood event specified in 35 Ill. Adm. Code 845.510(a)(3).

7.0 CERTIFICATION

I certify that:

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

Certified By: Thomas J. Dehlin

Date: October 13, 2023

Seal:



th. Dehlin Thomas Dehlin
2023.10.13
12:24:07-05'00'

7.0 CERTIFICATION

I certify that:

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

Certified By: Thomas J. Dehlin Date: October 13, 2023

Seal:



th. Dehlin Thomas Dehlin
2023.10.13
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ATTACHMENT C
2023 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 - 2023**

**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 31, 2024

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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 2023 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 2023 reporting period, the following are 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 quarters), MW-07 (1st and 2nd quarters)
- Chloride: MW-01 (2nd quarter), MW-07, MW-14, and MW-15 (1st through 4th quarters)
- Fluoride: MW-07 (4th quarter)
- pH: MW-02 and MW-14 (1st through 4th quarter), MW-07 (3rd quarter)
- Sulfate: MW-07 (2nd quarter), MW-15 (1st through 3rd quarters)

- Total Dissolved Solids (TDS): MW-07 and MW-15 (1st and 2nd quarters)
- Arsenic: MW-02, MW-07, MW-14, and MW-15 (1st through 4th quarters)
- Barium: MW-14 (1st quarter), MW-15 (1st and 2nd quarters)

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

Pond 1S

- Calcium: MW-04 (1st quarter)
- Chloride: MW-08, MW-09, and MW-13 (1st through 4th quarters)
- Fluoride: MW-08 and MW-09 (1st through 4th quarters)
- pH: MW-09 (1st through 4th quarters)
- Lead: MW-13 (1st through 4th quarters)
- Molybdenum: MW-08 (3rd and 4th quarters) and MW-09 (1st through 4th quarters)
- Selenium: MW-03 (1st quarter), MW-04 (3rd quarter) 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 2023 reporting period, the following constituents are above the *proposed* GWPSs:

Pond 1N

- Calcium: MW-01 and MW-15 (1st through 4th quarters), MW-07 (1st and 2nd quarters)
- Sulfate: MW-07 (2nd quarter), MW-15 (1st through 3rd quarters)
- TDS: MW-07 and MW-15 (1st and 2nd quarters)
- Arsenic: MW-02 (3rd and 4th quarters)

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

Pond 1S

- Calcium: MW-04 (1st quarter)
- pH: MW-09 (1st quarter)

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

- Section 845.610(e)(4)(E though 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 2023 reporting period:

- Continued quarterly groundwater monitoring. The 60-day data summary submittals for all rounds collected have been placed in the facility's 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.
- Submittal of the Application for Initial Construction Permit for Ponds 1N and 1S on August 1, 2023 with the required pre-submittal public meetings being held on June 7th and 8th, 2023.

Key activities for the upcoming year include:

- 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.
- Receipt of an approved Application for Initial Construction Permit which will facilitate proceeding to formal closure of the regulated Units.
- 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 2023) 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 and 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 2023 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 quarters), MW-07 (1st and 2nd quarters)
- Chloride: MW-01 (2nd quarter), MW-07, MW-14, and MW-15 (1st through 4th quarters)
- Fluoride: MW-07 (4th quarter)
- pH: MW-02 and MW-14 (1st through 4th quarter), MW-07 (3rd quarter)
- Sulfate: MW-07 (2nd quarter), MW-15 (1st through 3rd quarters)
- Total Dissolved Solids (TDS): MW-07 and MW-15 (1st and 2nd quarters)
- Arsenic: MW-02, MW-07, MW-14, and MW-15 (1st through 4th quarters)
- Barium: MW-14 (1st quarter), MW-15 (1st and 2nd quarters)

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

Pond 1S

- Calcium: MW-04 (1st quarter)
- Chloride: MW-08, MW-09, and MW-13 (1st through 4th quarters)
- Fluoride: MW-08 and MW-09 (1st through 4th quarters)
- pH: MW-09 (1st through 4th quarters)
- Lead: MW-13 (1st through 4th quarters)
- Molybdenum: MW-08 (3rd and 4th quarters) and MW-09 (1st through 4th quarters)
- Selenium: MW-03 (1st quarter), MW-04 (3rd quarter) 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	2.0	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	2.0	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	1.00	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
	2/22/2023	2	170	29	0.49	6.93	360	1000	< 0.003	< 0.001	0.082	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.031	< 0.0002	0.013	< 0.544	0.0092	< 0.002
	4/27/2023	2.4	120	77	0.69	6.79	400	1100	< 0.0030	< 0.0010	0.065	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.028	< 0.00020	0.041	0.824	< 0.0025	< 0.0020
	7/27/2023	2.3	170	29	0.58	6.54	320	1000	< 0.0030	< 0.0010	0.088	^+ < 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.036	< 0.00020	0.016	1.92	0.013	< 0.0020
10/23/2023	2.1	160	21	0.55	6.47	240	1000	< 0.0030	< 0.0010	B 0.087	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.038	< 0.00020	0.012	< 0.625	0.0099	< 0.0020	
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
	2/22/2023	4.6	89	29	0.38	7.86	460	980	< 0.003	0.0095	0.06	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.042	< 0.0002	0.075	0.974	< 0.0025	< 0.002
	4/27/2023	4.6	83	29	0.37	7.60	430	1000	< 0.0030	0.0088	0.053	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.043	< 0.00020	0.072	0.961	< 0.0025	< 0.0020
	7/27/2023	5.8	89	28	0.38	7.50	490	990	< 0.0030	0.011	0.056	^+ < 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.046	< 0.00020	0.073	1.31	< 0.0025	< 0.0020
10/23/2023	5.7	93	26	0.36	7.56	480	1100	< 0.0030	0.012	B 0.061	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.050	< 0.00020	0.07	0.726	< 0.0025	< 0.0020	
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 6.0	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	< 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	1.00	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

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	0.10	< 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	0.10	< 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	4.0	140	18	0.31	6.62	300	910	< 0.003	0.0014	0.10	< 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	F1 0.64	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
	2/22/2023	2.4	180	14	0.29	6.83	330	1000	< 0.003	< 0.001	0.099	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.03	< 0.0002	0.013	0.76	0.03	< 0.002
4/27/2023	3.2	150	16	0.28	6.54	320	1000	< 0.0030	< 0.001	0.090	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.040	< 0.00020	0.021	1.12	0.0057	< 0.0020	
7/27/2023	3.5	160	16	0.25	6.53	280	930	< 0.0030	0.0010	0.11	^+ < 0.0010	< 0.00050	< 0.0050	0.010	< 0.00050	0.043	< 0.00020	0.013	1.43	0.0053	< 0.0020	
10/23/2023	3.7	140	19	0.26	6.63	200	900	< 0.0030	< 0.0010	B 0.10	< 0.0010	< 0.00050	< 0.0050	0.012	< 0.00050	0.034	< 0.00020	0.011	1.90	0.0042	< 0.0020	
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	0.019	< 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	0.016	< 0.0005	0.026	< 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	0.016	< 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	0.011	< 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	0.016	< 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	0.018	< 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	0.022	< 0.0005	0.022	< 0.0002	0.023	1.17	< 0.0025	< 0.002
	2/24/2022	4.7	350	16	0.37	6.50	950	2100	< 0.003	0.02	0.039	^1+ < 0.001	< 0.0005	< 0.005	0.017	< 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	0.021	< 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	0.019	< 0.0005	0.023	< 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	0.032	< 0.0005	0.02	< 0.0002	0.021	4.15	0.0061	< 0.002
	2/22/2023	3.7	390	36	0.38	6.77	1200	2500	< 0.003	0.0044	0.035	< 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.02	< 0.0002	0.032	0.795	0.067	< 0.002
4/27/2023	4.3	310	25	0.33	6.51	870	2000	< 0.0030	0.0027	0.039	< 0.0010	< 0.00050	< 0.0050	0.015	< 0.00050	0.021	< 0.00020	0.023	1.19	0.0091	< 0.0020	
7/27/2023	4.9	300	20	0.36	6.49	790	1700	< 0.0030	0.0017	0.041	^+ < 0.0010	< 0.00050	< 0.0050	0.015	< 0.00050	0.021	< 0.00020	0.019	1.28	0.026	< 0.0020	
10/23/2023	4.6	210	12	0.40	6.55	500	1300	< 0.0030	0.0013	0.043	< 0.0010	< 0.00050	< 0.0050	0.015	< 0.00050	0.019	< 0.00020	0.022	0.923	0.013	< 0.0020	
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	0.015	< 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	0.021	< 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	0.011	< 0.0005	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	0.012	< 0.0005	0.022	< 0.0002	0.07	0.841	< 0.0025	< 0.002
	8/2/2021	3.1	180	180	0.53	6.87	530	1400	< 0.003	0.012	0.074	< 0.001	< 0.0005	< 0.005	0.021	< 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	0.021	< 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	0.014	< 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	0.016	< 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	0.016	< 0.0005	0.021	< 0.0002	0.11	1.2	< 0.0025	< 0.002
	2/23/2023	1.9	150	200	0.6	7.03	320	1300	< 0.003													

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
	6/15/2022	10.56
	8/24/2022	15.3
MW-02	11/15/2022	19.8
	2/22/2023	19.12
	4/27/2023	4.40
	7/27/2023	7.20
	10/23/2023	4.10
	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	
2/22/2023	6.07	
4/27/2023	2.90	
7/27/2023	7.40	
10/23/2023	7.00	
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
	2/22/2023	13.55
	4/27/2023	8.90
7/27/2023	1.00	
10/23/2023	8.10	
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
	8/23/2022	2.71
	11/17/2022	2.8
	2/21/2023	6.71
	4/25/2023	5.0
7/25/2023	3.7	
10/19/2023	1.7	
MW-15	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
	2/21/2023	41.83
	4/25/2023	11.2
7/25/2023	35.6	
10/19/2023	55.2	

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	9.7	
2/22/2023	6.9	
4/27/2023	2.00	
7/27/2023	7.20	
10/23/2023	0.50	
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	
2/22/2023	20.1	
4/27/2023	8.40	
7/27/2023	6.00	
10/23/2023	3.5	
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	
2/23/2023	43.13	
4/27/2023	29.20	
7/26/2023	16.90	
10/24/2023	11.30	
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
2/23/2023	10.34	
4/26/2023	2.90	
7/26/2023	6.50	
10/24/2023	9.50	
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
	2/21/2023	41.7
	4/25/2023	41.90
7/25/2023	16.70	
10/19/2023	47.10	

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
	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
	1/26/2023	592.95	10.30	582.65
	2/21/2023	592.95	9.98	582.97
	3/15/2023	592.95	10.02	582.93
4/25/2023	592.95	10.35	582.60	
5/19/2023	592.95	10.60	582.35	
6/8/2023	592.95	11.06	581.89	
7/25/2023	592.95	10.28	582.67	
8/29/2023	592.95	10.63	582.32	
9/21/2023	592.95	10.23	582.72	
10/19/2023	592.95	10.39	582.56	
11/14/2023	592.95	10.73	582.22	
12/7/2023	592.95	10.35	582.6	
MW-02	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
	1/26/2023	594.00	13.39	580.61
	2/21/2023	594.00	11.13	582.87
	3/15/2023	594.00	11.11	582.89
4/25/2023	594.00	11.49	582.51	
5/19/2023	594.00	11.72	582.28	
6/8/2023	594.00	12.26	581.74	
7/25/2023	594.00	11.47	582.53	
8/29/2023	594.00	11.84	582.16	
9/21/2023	594.00	11.41	582.59	
10/19/2023	594.00	11.52	582.48	
11/14/2023	594.00	11.92	582.08	
12/7/2023	594.00	11.49	582.51	

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-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
	1/26/2023	593.51	10.84	582.67
	2/21/2023	593.51	10.58	582.93
	3/15/2023	593.51	10.57	582.94
	4/25/2023	593.51	10.88	582.63
5/19/2023	593.51	11.28	582.23	
6/8/2023	593.51	12.19	581.32	
7/25/2023	593.51	11.08	582.43	
8/29/2023	593.51	11.90	581.61	
9/21/2023	593.51	11.27	582.24	
10/19/2023	593.51	11.26	582.25	
11/14/2023	593.51	11.32	582.19	
12/7/2023	593.51	10.97	582.54	
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
	1/26/2023	593.93	11.10	582.83
	2/21/2023	593.93	10.95	582.98
	3/15/2023	593.93	10.98	582.95
4/24/2023	593.93	11.37	582.56	
5/19/2023	593.93	11.65	582.28	
6/8/2023	593.93	12.51	581.42	
7/25/2023	593.93	11.27	582.66	
8/29/2023	593.93	11.62	582.31	
9/21/2023	593.93	11.06	582.87	
10/19/2023	593.93	10.22	583.71	
11/14/2023	593.93	11.62	582.31	
12/7/2023	593.93	11.10	582.83	

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
	1/26/2023	592.89	10.09	582.80
	2/21/2023	592.89	10.55	582.34
	3/15/2023	592.89	10.47	582.42
	4/24/2023	592.89	10.97	581.92
	5/19/2023	592.89	11.45	581.44
	6/8/2023	592.89	11.99	580.90
	7/25/2023	592.89	11.48	581.41
8/29/2023	592.89	11.81	581.08	
9/21/2023	592.89	11.23	581.66	
10/19/2023	592.89	11.18	581.71	
11/14/2023	592.89	11.52	581.37	
12/7/2023	592.89	10.97	581.92	
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
	1/26/2023	592.75	11.20	581.55
	2/21/2023	592.75	10.93	581.82
	3/15/2023	592.75	10.57	582.18
	4/25/2023	592.75	11.46	581.29
	5/19/2023	592.75	11.95	580.80
	6/8/2023	592.75	12.58	580.17
	7/25/2023	592.75	11.98	580.77
8/29/2023	592.75	12.18	580.57	
9/21/2023	592.75	11.57	581.18	
10/19/2023	592.75	11.59	581.16	
11/14/2023	592.75	12.10	580.65	
12/7/2023	592.75	11.27	581.48	

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-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	
1/26/2023	592.87	11.59	581.28	
2/21/2023	592.87	11.28	581.59	
3/15/2023	592.87	11.07	581.80	
4/25/2023	592.87	11.80	581.07	
5/19/2023	592.87	12.16	580.71	
6/8/2023	592.87	12.79	580.08	
7/25/2023	592.87	11.89	580.98	
8/29/2023	592.87	12.08	580.79	
9/21/2023	592.87	11.35	581.52	
10/19/2023	592.87	11.45	581.42	
11/14/2023	592.87	12.23	580.64	
12/7/2023	592.87	11.56	581.31	
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
	1/26/2023	592.80	10.85	581.95
	2/21/2023	592.80	10.79	582.01
	3/15/2023	592.80	10.75	582.05
	4/25/2023	592.80	11.03	581.77
	5/19/2023	592.80	10.88	581.92
	6/8/2023	592.80	11.07	581.73
	7/25/2023	592.80	10.96	581.84
8/29/2023	592.80	10.93	581.87	
9/21/2023	592.80	10.79	582.01	
10/19/2023	592.80	10.90	581.90	
11/14/2023	592.80	11.07	581.73	
12/7/2023	592.80	10.76	582.04	

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-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
	1/26/2023	592.70	10.64	582.06
	2/21/2023	592.70	10.42	582.28
	3/15/2023	592.70	10.34	582.36
4/25/2023	592.70	10.66	582.04	
5/29/2023	592.70	10.83	581.87	
6/8/2023	592.70	11.34	581.36	
7/25/2023	592.70	10.74	581.96	
8/29/2023	592.70	11.06	581.64	
9/21/2023	592.70	10.67	582.03	
10/19/2023	592.70	10.70	582.00	
11/14/2023	592.70	11.06	581.64	
12/7/2023	592.70	10.64	582.06	
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
	1/26/2023	592.89	10.50	582.39
	2/21/2023	592.89	9.65	583.24
	3/15/2023	592.89	9.58	583.31
4/25/2023	592.89	10.03	582.86	
5/19/2023	592.89	10.37	582.52	
6/8/2023	592.89	10.97	581.92	
7/25/2023	592.89	10.36	582.53	
8/29/2023	592.89	10.74	582.15	
9/21/2023	592.89	10.34	582.55	
10/19/2023	592.89	10.33	582.56	
11/14/2023	592.89	10.59	582.30	
12/7/2023	592.89	10.11	582.78	

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)
1/26/2023	West	2.315E-04	0.0034	0.2	0.34
2/21/2023	West	2.315E-04	0.0036	0.2	0.36
3/15/2023	West	2.315E-04	0.0052	0.2	0.52
4/24/2023	West	2.315E-04	0.0043	0.2	0.43
5/19/2023	West	2.315E-04	0.0055	0.2	0.55
6/8/2023	West	2.315E-04	0.0048	0.2	0.48
7/25/2023	West	2.315E-04	0.0060	0.2	0.60
8/29/2023	West	2.315E-04	0.0054	0.2	0.54
9/21/2023	West	2.315E-04	0.0138	0.2	1.38
10/19/2023	West	2.315E-04	0.0055	0.2	0.55
11/14/2023	West	2.315E-04	0.0043	0.2	0.43
12/7/2023	West	2.315E-04	0.0099	0.2	0.99

* 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 2023 - Will County Generating Station. Ponds 1N/1S.

Well ID	Number of Groundwater Sampling Events	Dates Groundwater Sampling Events
MW-01 (Upgradient)	4	2/22/2023
		4/27/2023
		7/27/2023
		10/23/2023
MW-02 (Upgradient)	4	2/22/2023
		4/27/2023
		4/27/2023
		10/23/2023
MW-03 (Upgradient)	4	2/22/2023
		4/27/2023
		7/27/2023
		10/23/2023
MW-04 (Upgradient)	4	2/22/2023
		4/27/2023
		7/27/2023
		10/23/2023
MW-07 (Downgradient)	4	2/22/2023
		4/27/2023
		7/27/2023
		10/23/2023
MW-08 (Downgradient)	4	2/23/2023
		4/27/2023
		7/26/2023
		10/24/2023
MW-09 (Downgradient)	4	2/23/2023
		4/26/2023
		7/26/2023
		10/24/2023
MW-13 (Downgradient)	4	2/21/2023
		4/25/2023
		7/25/2023
		10/19/2023
MW-14 (Downgradient)	4	2/21/2023
		4/25/2023
		7/25/2023
		10/19/2023
MW-15 (Downgradient)	4	2/21/2023
		4/25/2023
		7/25/2023
		10/19/2023

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

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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'

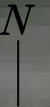
Date: January 18, 2022

KPRG Project No. 12313.3

FIGURE 1

SEWAGE
TREATMENT
PLANT

WASTEWATER
TREATMENT



MW-15	
PARAMETER	RESULT
CALCIUM	140

MW-15
MW-01

ASH
POND
1-N

MW-01	
PARAMETER	RESULT
CALCIUM	160

MW-14
MW-02

MW-02	
PARAMETER	RESULT
ARSENIC	0.012

MW-05
MW-05
ASH
POND
1-S

MW-13
MW-09
MW-04

ASH
POND
2-S

ASH
POND
3-S

RETENTION
POND

DES PLAINES RIVER

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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4Q23 AREAL DISTRIBUTION MAP OF
PARAMETERS ABOVE PROPOSED GWPSs

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

Scale: 1" = 250' Date: January 11, 2024

KPRG Project No. 12313.3

Figure 2

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ATTACHMENT 1
Monthly Potentiometric Maps

SEWAGE
TREATMENT
PLANT

WASTEWATER
TREATMENT

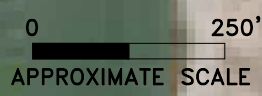


DES PLAINES RIVER



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 01/2023

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

Scale: 1" = 250'

Date: July 5, 2023

KPRG Project No. 12313.3

ATTACHMENT 1

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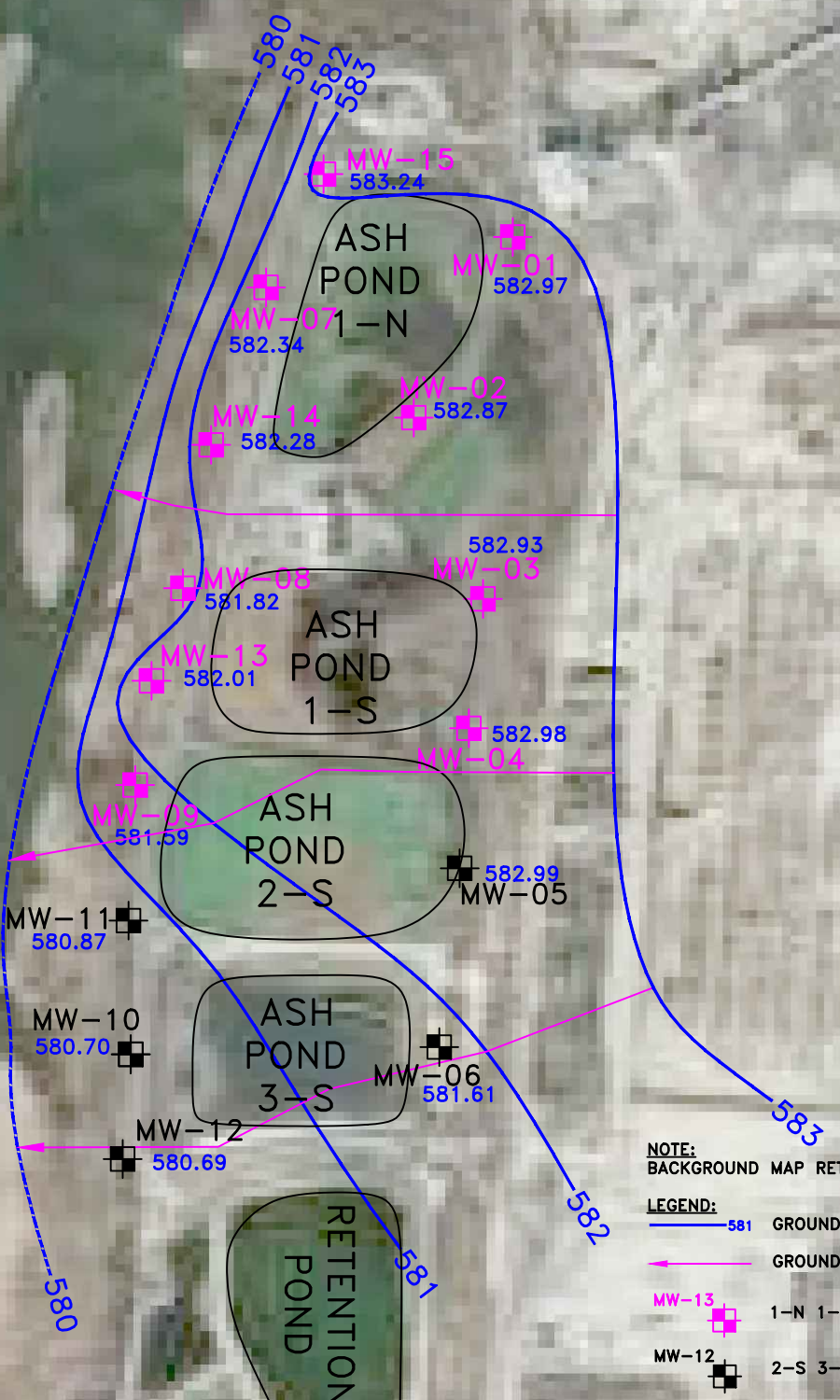
SEWAGE
TREATMENT
PLANT

WASTEWATER
TREATMENT

N

DES PLAINES RIVER

ASH POND
1-N
ASH POND
1-S
ASH POND
2-S
ASH POND
3-S
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



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POTENTIOMETRIC MAP 02/2023

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

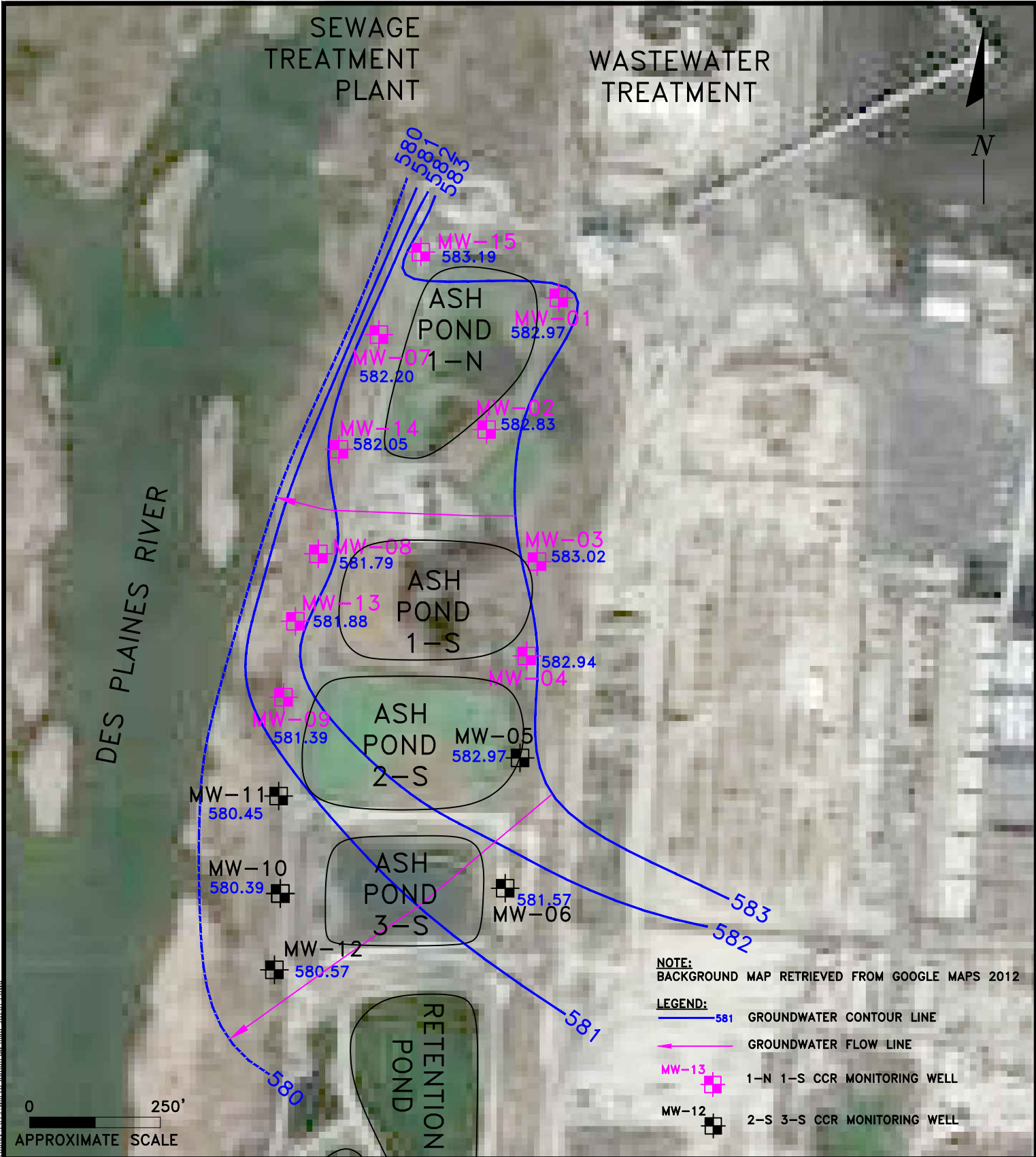
Scale: 1" = 250'

Date: July 5, 2023

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 03/2023

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

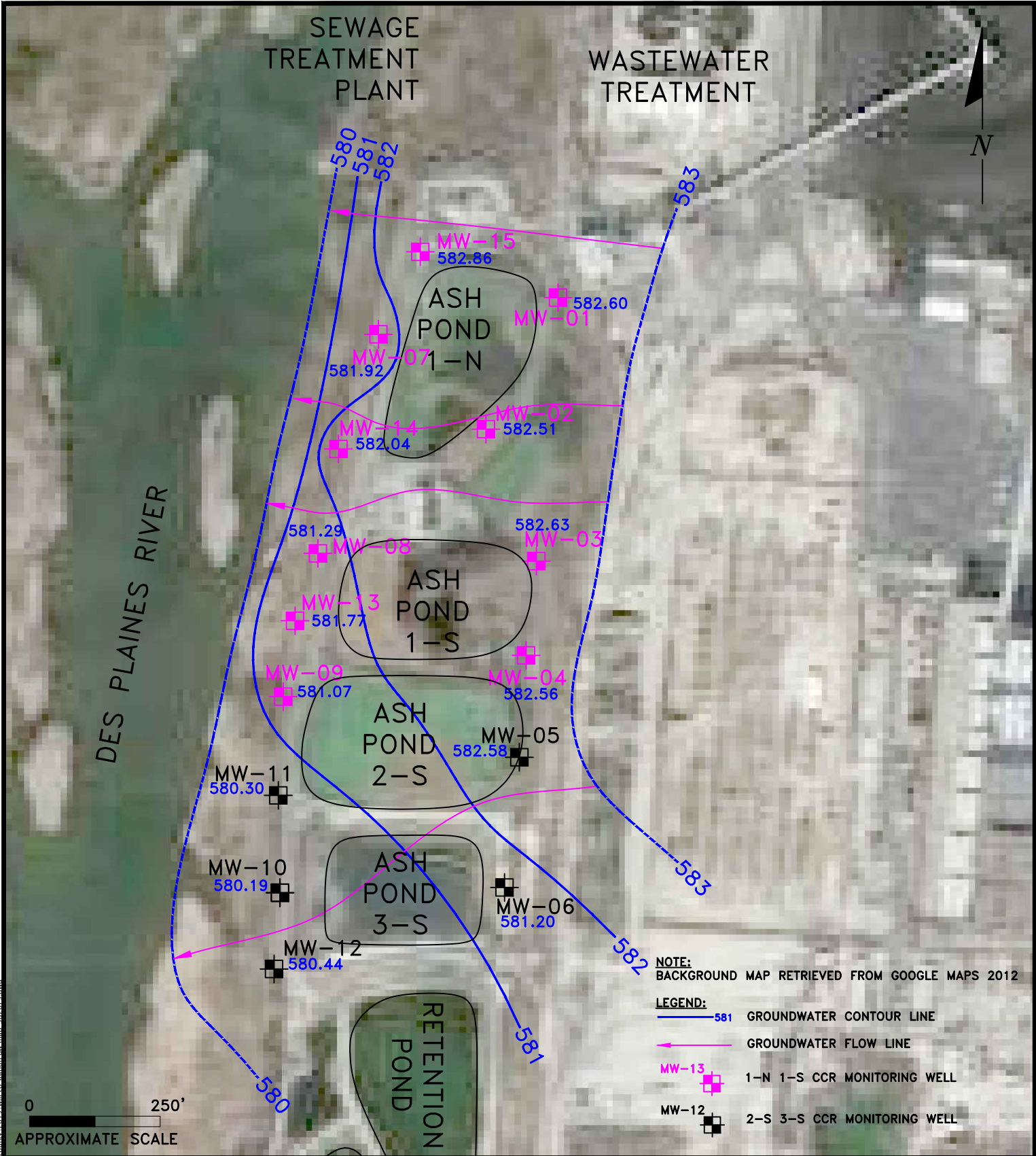
Scale: 1" = 250'

Date: July 5, 2023

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 04/2023

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

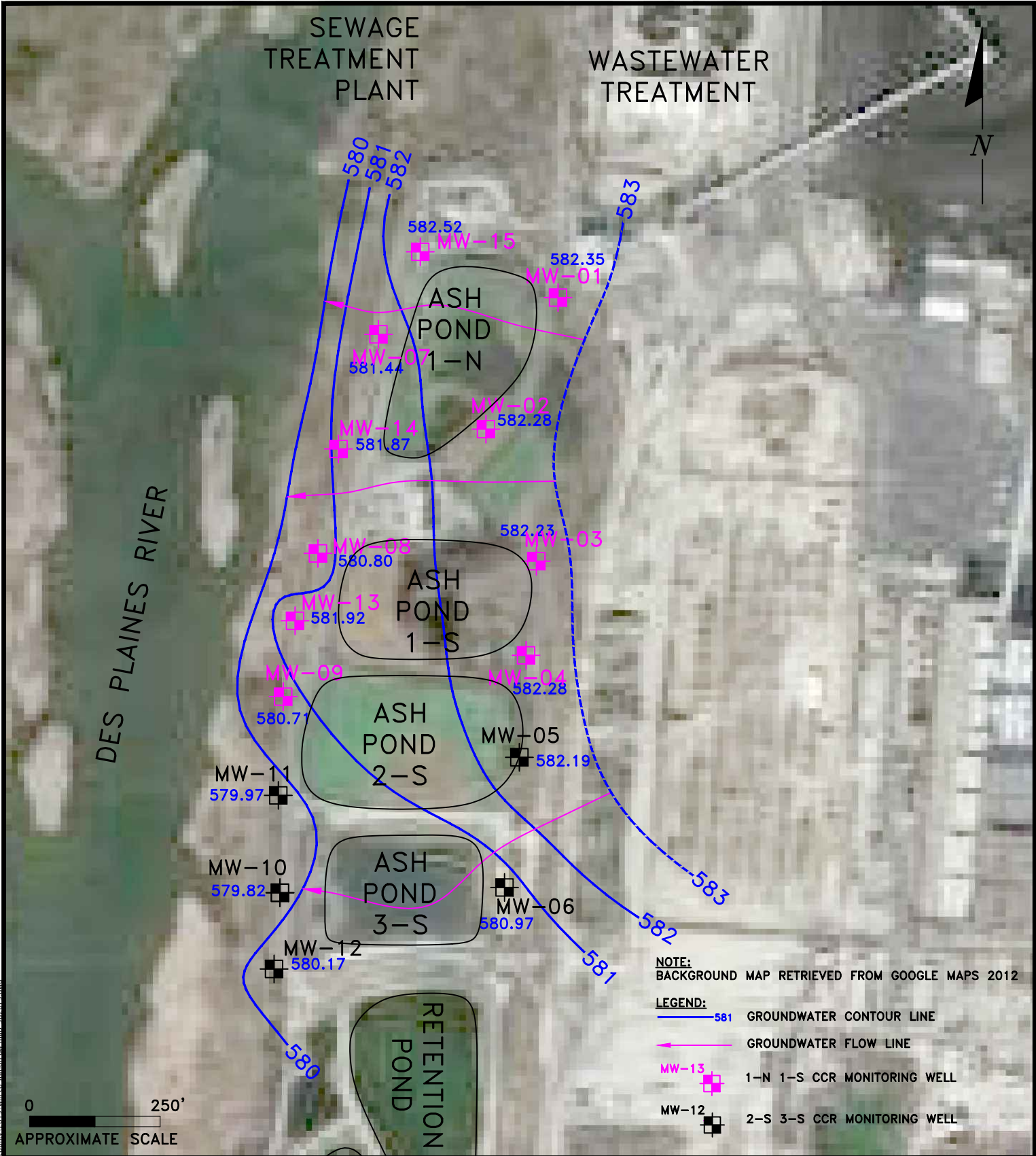
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Date: July 5, 2023

KPRG Project No. 12313.3

ATTACHMENT 1

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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 05/2023

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

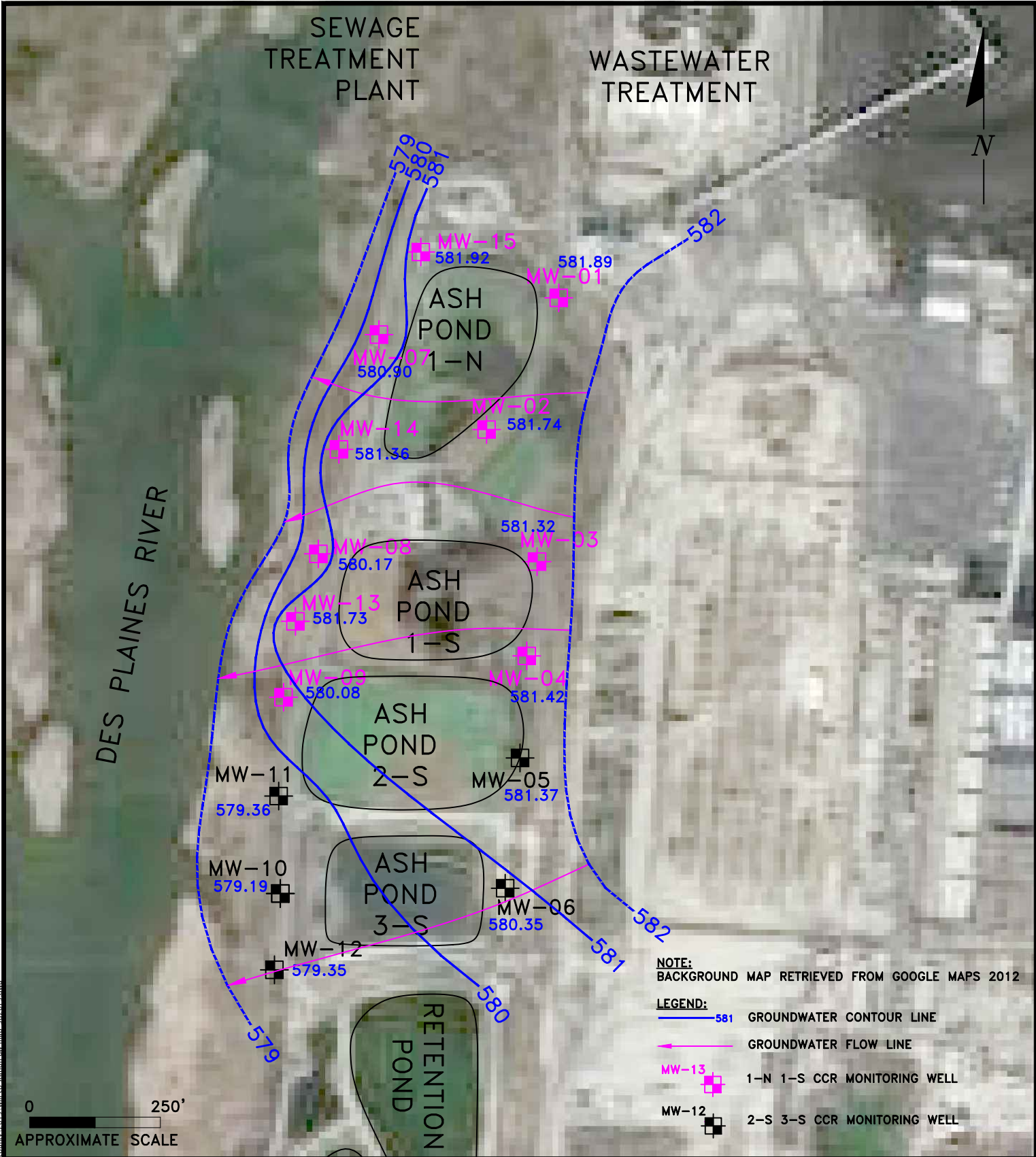
Scale: 1" = 250'

Date: July 5, 2023

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 06/2023

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

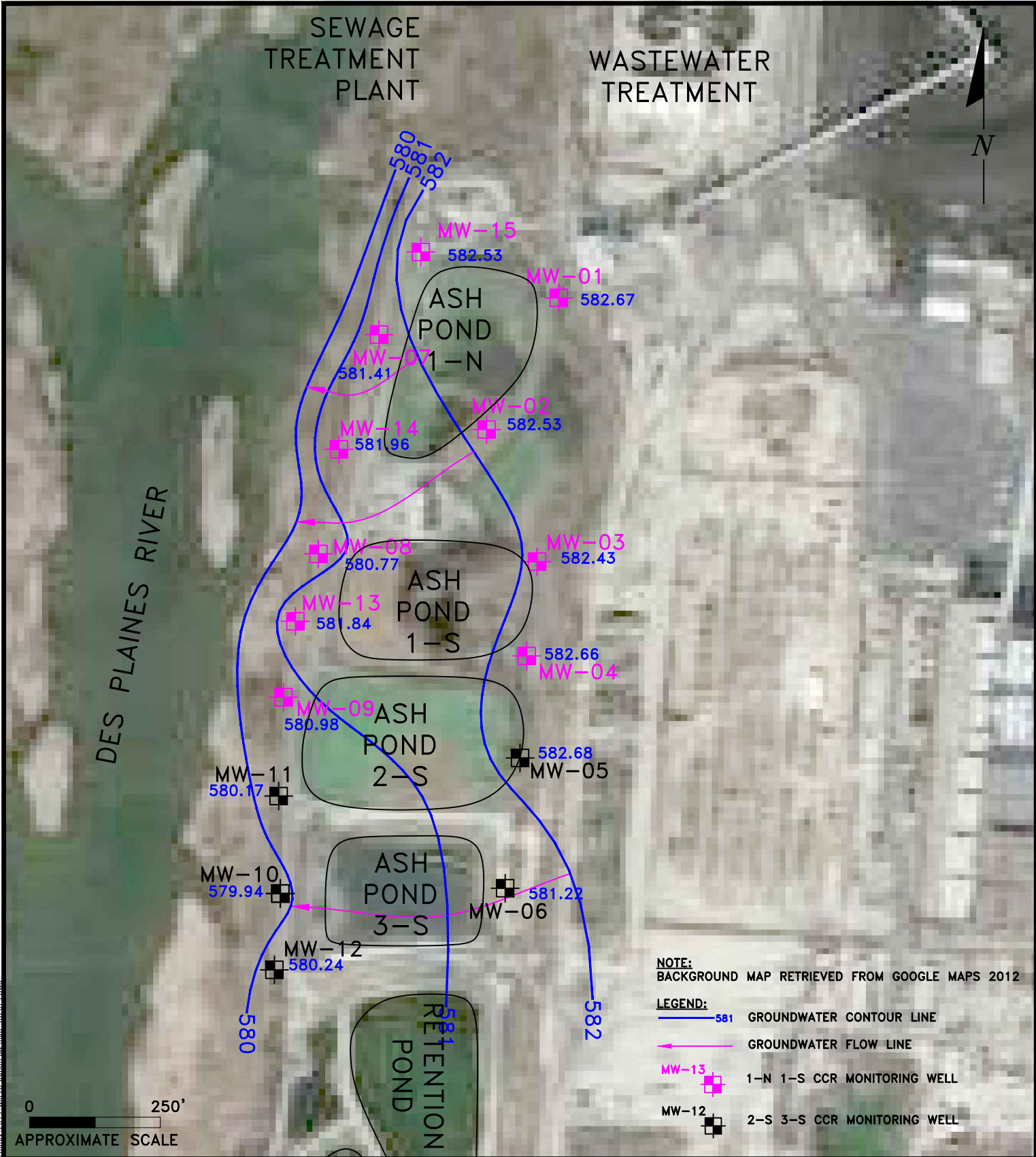
Scale: 1" = 250'

Date: July 6, 2023

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 07/2023

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

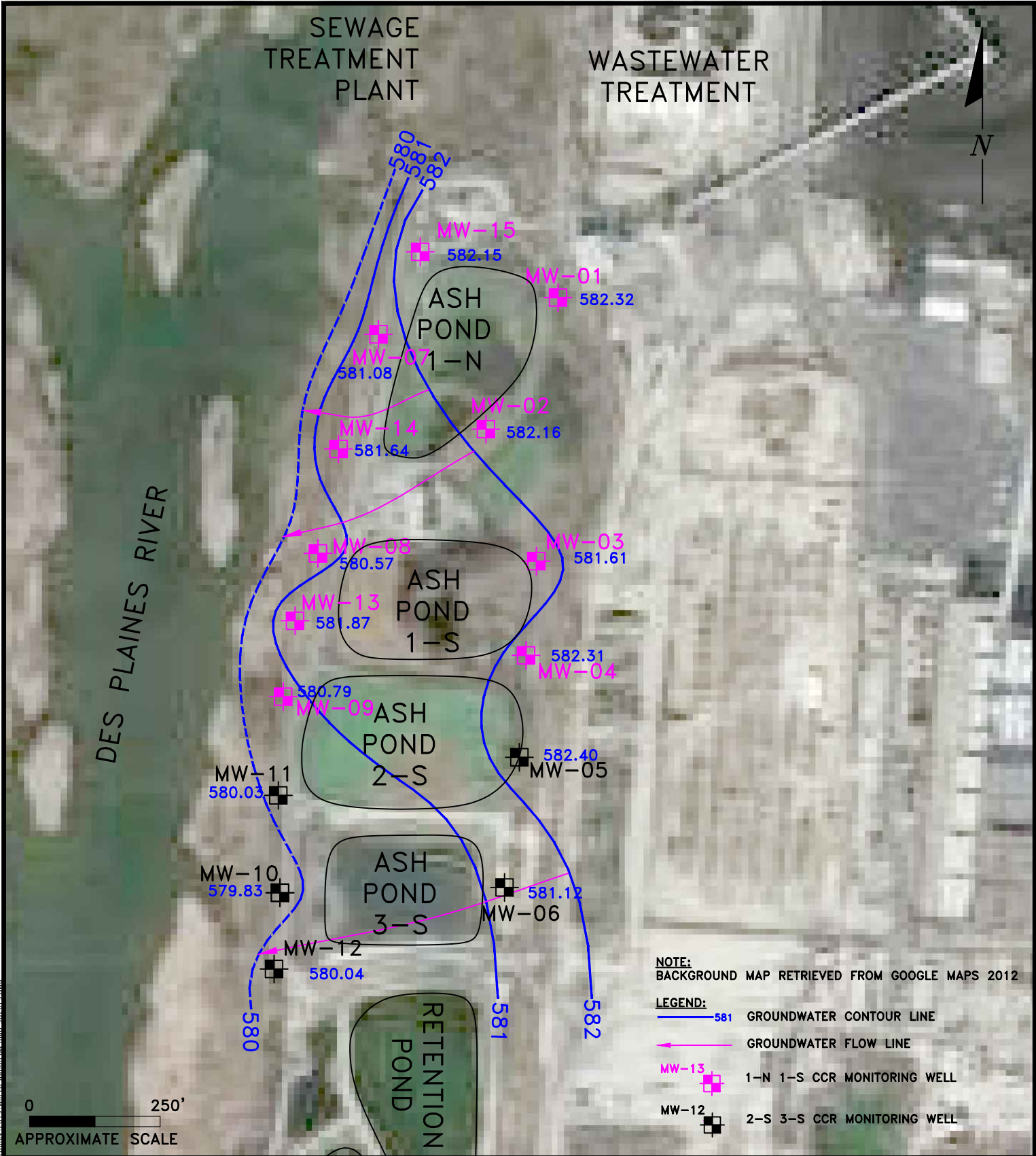
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Date: August 16, 2023

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 08/2023

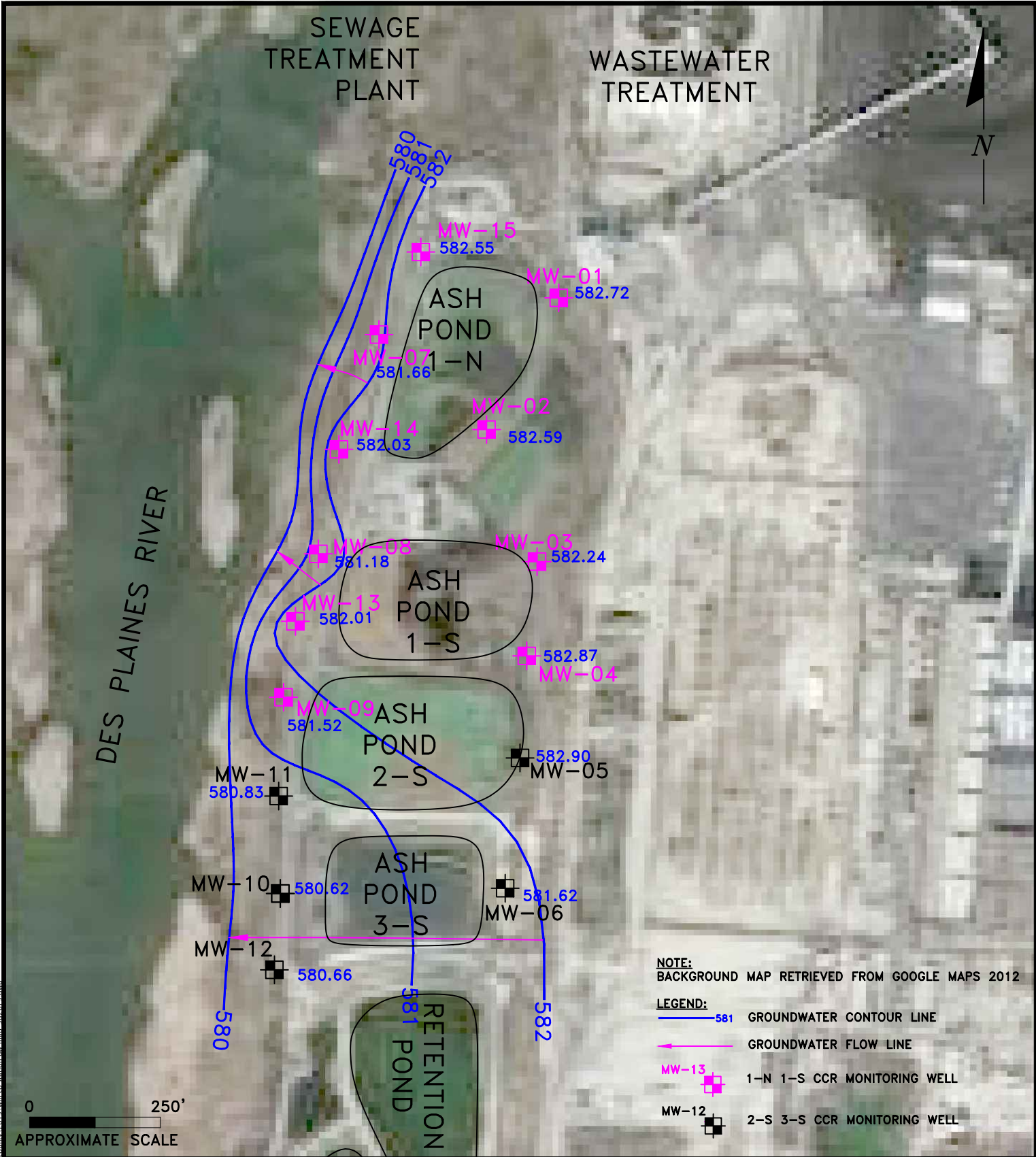
WILL COUNTY STATION, PONDS 1-N 1-S, ROMEOVILLE, ILLINOIS

Scale: 1" = 250' Date: October 2, 2023

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 09/2023

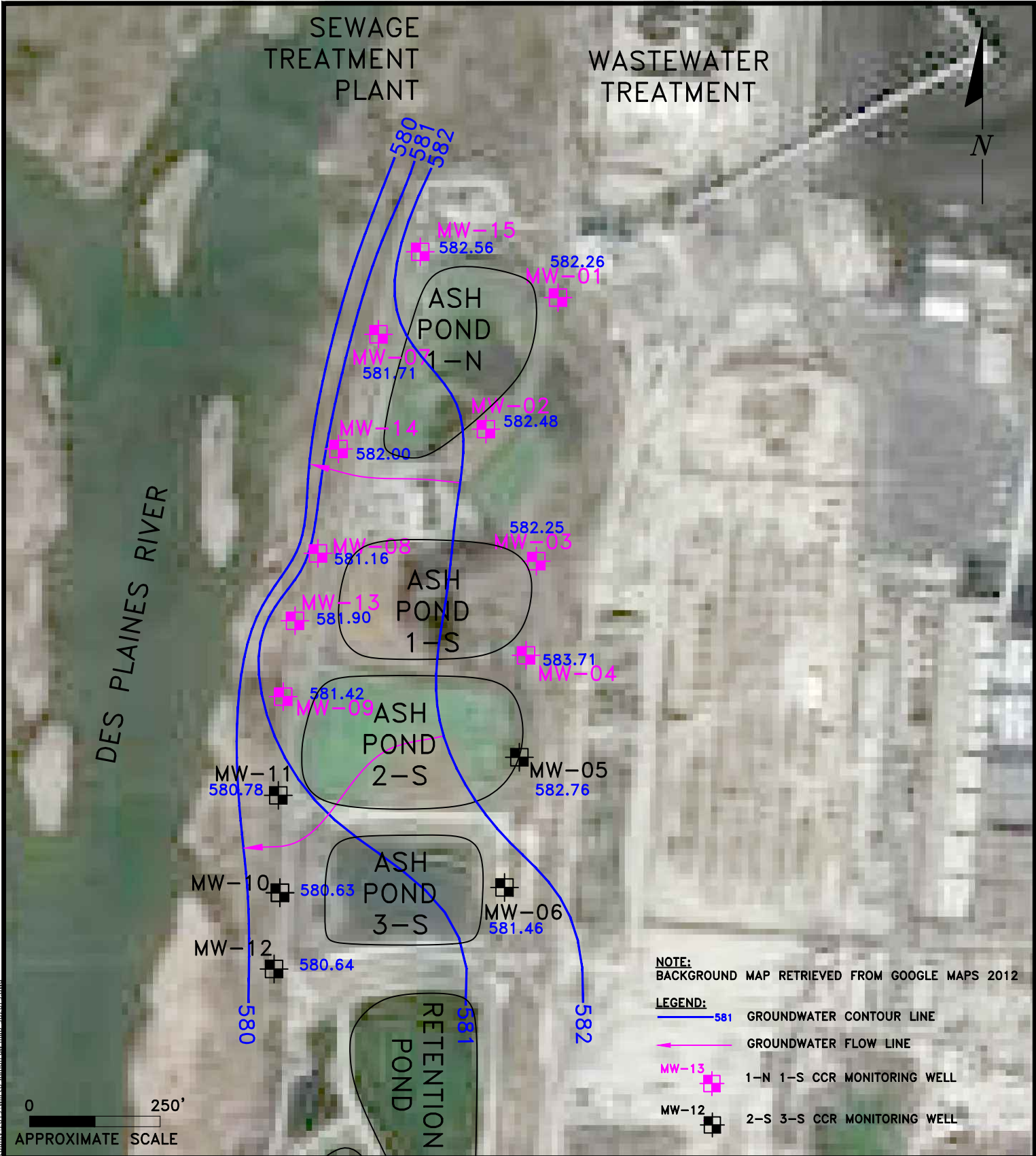
WILL COUNTY STATION, PONDS 1-N 1-S, ROMEOVILLE, ILLINOIS

Scale: 1" = 250' Date: January 5, 2024

KPRG Project No. 12313.3

ATTACHMENT 1

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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 10/2023

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

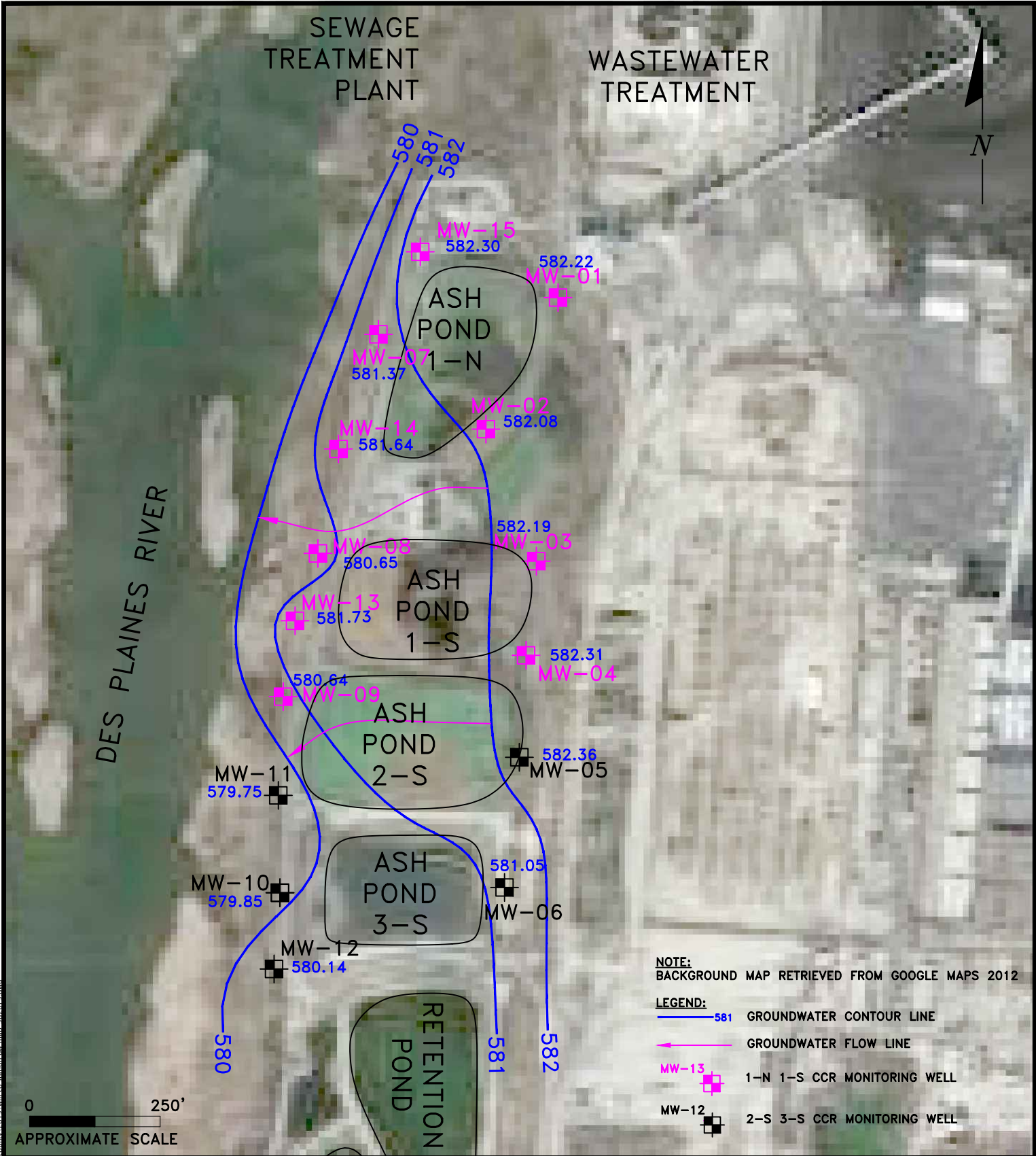
Scale: 1" = 250'

Date: January 4, 2024

KPRG Project No. 12313.3

ATTACHMENT 1

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ENVIRONMENTAL CONSULTATION & REMEDIATION

POTENTIOMETRIC MAP 11/2023

K P R G

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

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

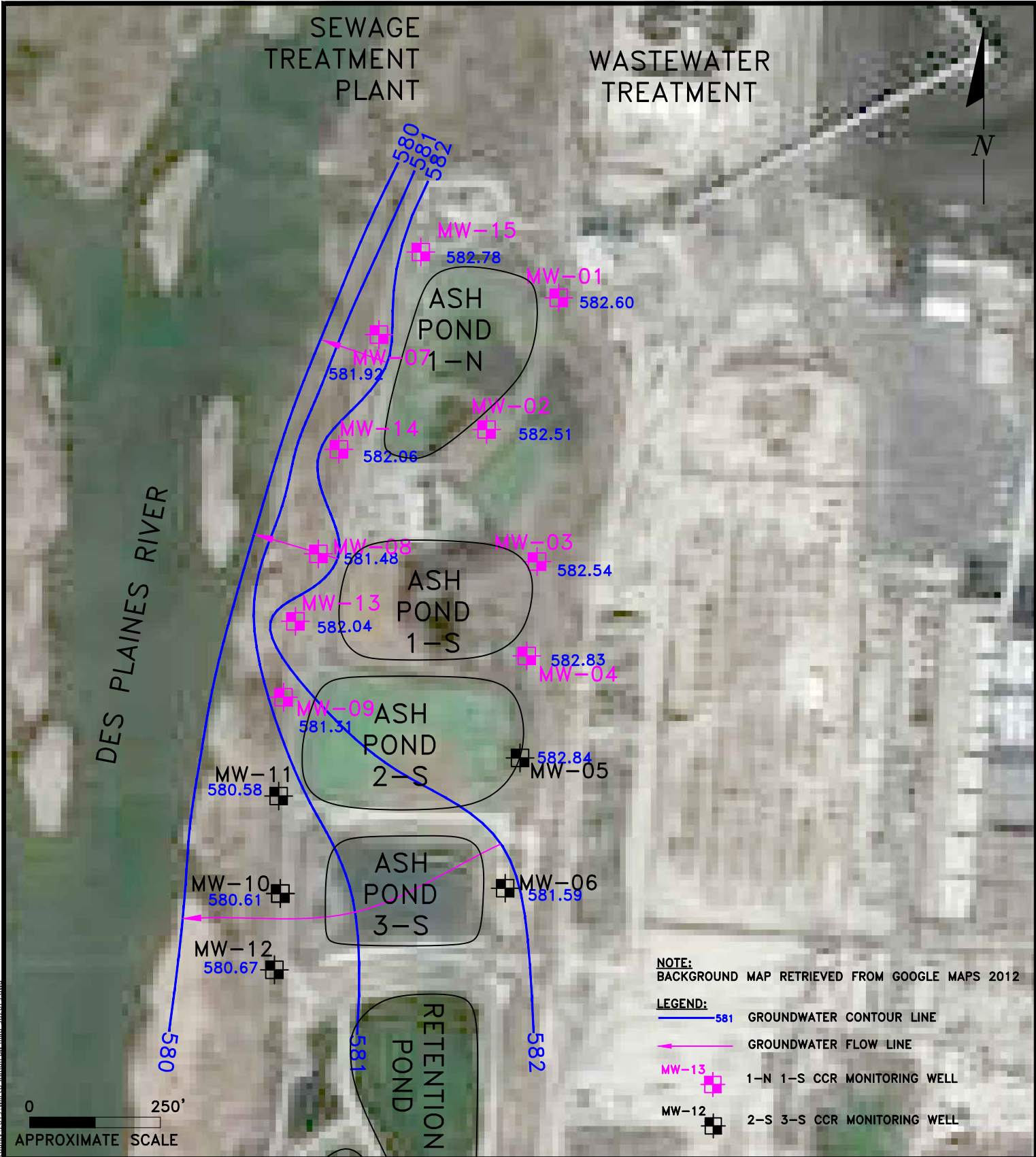
Scale: 1" = 250' Date: January 4, 2024

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

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 12/2023

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

Scale: 1" = 250'

Date: January 4, 2024

KPRG Project No. 12313.3

ATTACHMENT 1



ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

**ILLINOIS CCR COMPLIANCE
ASH PONDS 2 SOUTH and 3 SOUTH
ANNUAL GROUNDWATER MONITORING and
CORRECTIVE ACTION REPORT - 2023**

**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 31, 2024

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2.1 Summary of Actions and Submittals (Section 845.610(e)(2)).....	3
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3 – Proposed Statistical Background Concentrations and Site-specific Groundwater Protection Standards	
4 – Summary of Groundwater Elevation Measurements	
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6 – Groundwater Sample Collection Summary	

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ATTACHMENTS

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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) as shown on Figure 1. Wells MW-05 and MW-06 are upgradient wells. 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 2023 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 2023 reporting period, the following are 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), MW-12 (2nd through 4th quarters)
 - Fluoride: MW-10 (2nd and 4th quarters)
 - pH: MW-05 (4th quarter)
 - Total Dissolved Solids: MW-05 (1st through 3rd quarters), MW-12 (3rd and 4th quarters)
 - Arsenic: MW-09, MW-10 and MW-11 (1st through 4th quarters)
 - Barium: MW-10 (1st quarter), and MW-11 and MW-12 (1st through 4th quarters)

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

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 2023 reporting period, the following constituents are above the *proposed* GWPSs:
 - Boron: MW-05 (1st through 4th quarters)
 - Total Dissolved Solids: MW-05 (2nd quarter)
 - Arsenic: MW-10 (1st through 3rd quarters), MW-11 (1st and 2nd quarters)
 - Selenium: MW-05 (3rd and 4th quarters)

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 relative to the State CCR Rule. It is noted that these ponds are under corrective action relative to the Federal CCR Rule. Please refer to the Federal CCR Compliance Annual Groundwater Monitoring and Corrective Action Report – 2023 in the facility’s operating record for additional information.

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 2023 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 facility's 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.
- Submittal of the Application for Initial Construction Permit for Ponds 2S and 3S on August 1, 2023 with the pre-submittal public meetings being held on June 7th and 8th, 2023.

Key activities for the upcoming year include:

- 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.
- Receipt of an approved Application for Initial Construction Permit which will facilitate proceeding to formal closure of the regulated Units.
- 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 2023) is provided on Figure 2.

There were no monitoring wells installed or decommissioned during this reporting period relative to the State CCR Rule. It is noted, however, that two additional well installations were completed for the purposes of a nature and extent of impacts delineation under the Federal CCR Rule. Please refer to the Federal CCR Compliance Annual Groundwater Monitoring and Corrective Action Report – 2023 in the facility's operating record for additional information.

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 2023 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), MW-12 (2nd through 4th quarters)
- Fluoride: MW-10 (2nd and 4th quarters)
- pH: MW-5 (4th quarter)
- Total Dissolved Solids: MW-05 (1st through 3rd quarters), MW-12 (3rd and 4th quarters)
- Arsenic: MW-09, MW-10 and MW-11 (1st through 4th quarters)
- Barium: MW-10 (1st quarter), and MW-11 and MW-12 (1st through 4th quarters)
- Lead: MW-10 (1st and 2nd quarters), MW-11 (1st quarter)
- Lithium: MW-05 (3rd and 4th quarters)
- Mercury: MW-05 (1st quarter)
- Radium: MW-05 (3rd quarter), MW-06 (1st quarter), MW-10 (1st through 4th quarters), MW-11 (1st, 3rd, and 4th quarters), MW-12 (4th quarter)
- Selenium: MW-05 (3rd and 4th quarters)

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	1900	< 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	1600	< 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	1500	< 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	1600	< 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	1200	< 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	1000	< 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	1000	< 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	1500	< 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	1300	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	1200	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	1200	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	1100	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	1000	< 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	1100	< 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	1400	< 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	1100	< 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	
	2/23/2023	6.3	120	26	0.43	6.83	430	1100	< 0.003	0.0018	0.058	^1+ ^+ < 0.001	< 0.0005	< 0.005	< 0.001	< 0.0005	0.012	0.00027	0.067	< 0.655	0.021	< 0.002	
4/26/2023	4.9	210	33	0.47	6.73	670	1600	< 0.0030	0.0022	0.040	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.013	< 0.0002	0.055	< 0.479	0.039	< 0.0020		
7/26/2023	4.8	180	18	0.50	6.91	440	1200	< 0.0030	0.0014	0.061	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.021	< 0.00020	0.053	0.823	0.070	< 0.0020		
10/24/2023	6.8	140	8.6	0.52	6.68	210	850	< 0.0030	0.0014	0.074	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.023	< 0.00020	0.071	< 0.967	0.077	< 0.0020		
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	0.0039	< 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	0.00054	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	1000	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	740	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																

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	1000	< 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	1000	< 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	1000	< 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	0.0012	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	NA	0.0088	NA	NA	NA	NA	NA	0.00093	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	
	2/23/2023	3.7	140	140	0.71	7.11	250	930	< 0.003	0.015	0.12	^1+ ^+ < 0.001	< 0.0005	< 0.005	< 0.001	0.0008	0.016	< 0.00020	0.073	1.35	< 0.0025	< 0.002	
4/26/2023	2.8	99	150	0.94	7.23	250	900	< 0.0030	0.013	0.079	< 0.0010	< 0.00050	< 0.0050	< 0.0010	0.00067	0.015	< 0.00020	0.12	1.37	< 0.0025	< 0.0020		
7/26/2023	3.7	120	150	0.81	7.37	260	910	< 0.0030	0.017	0.099	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.017	< 0.00020	0.097	0.959	< 0.0025	< 0.0020		
10/24/2023	2.9	99	160	0.89	7.19	230	920	< 0.0030	0.0087	0.083	< 0.0010	< 0.00050	< 0.0050	< 0.0010	< 0.00050	0.015	< 0.00020	0.12	1.30	< 0.0025	< 0.0020		
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	
	2/21/2023	2.2	120	130	0.45	7.08	81	710	< 0.003	0.016	0.18	< 0.001	< 0.0005	< 0.005	< 0.001	0.00096	< 0.01	< 0.0002	0.037	1.57	< 0.0025	< 0.002	
4/25/2023	2.8	110	130	0.53	7.14	75																	

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	
2/23/2023	2.18	
4/26/2023	1.6	
7/26/2023	7.1	
10/24/2023	0.8	
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
	2/23/2023	10.08
	4/26/2023	47.6
	7/26/2023	3.7
	10/24/2023	0.8
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
	2/23/2023	10.34
	4/27/2023	2.9
7/26/2023	6.5	
10/24/2023	9.5	
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
	2/23/2023	53.32
	4/26/2023	85.3
7/26/2023	1.4	
10/24/2023	5.4	
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
	2/21/2023	51.3
	4/25/2023	56.6
	7/25/2023	1.0
10/19/2023	3.9	
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
	2/21/2023	1.82
	4/25/2023	2.1
	7/25/2023	6.8
10/19/2023	3.0	

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
	1/26/2023	592.87	10.03	582.84
	2/21/2023	592.87	9.88	582.99
	3/15/2023	592.87	9.92	582.95
	4/25/2023	592.87	10.29	582.58
	5/19/2023	592.87	10.68	582.19
	6/8/2023	592.87	11.50	581.37
	7/25/2023	592.87	10.19	582.68
	8/29/2023	592.87	10.47	582.40
	9/21/2023	592.87	9.97	582.90
10/19/2023	592.87	10.11	582.76	
11/14/2023	592.87	10.51	582.36	
12/7/2023	592.87	10.03	582.84	
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
	1/26/2023	593.18	11.66	581.52
	2/21/2023	593.18	11.57	581.61
	3/15/2023	593.18	11.61	581.57
	4/25/2023	593.18	11.98	581.20
	5/19/2023	593.18	12.21	580.97
	6/8/2023	593.18	12.83	580.35
	7/25/2023	593.18	11.96	581.22
	8/29/2023	593.18	12.06	581.12
	9/21/2023	593.18	11.58	581.60
10/19/2023	593.18	11.72	581.46	
11/14/2023	593.18	12.13	581.05	
12/7/2023	593.18	11.89	581.59	

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
	1/26/2023	592.87	11.59	581.28
	2/21/2023	592.87	11.28	581.59
3/15/2023	592.87	11.07	581.80	
4/25/2023	592.87	11.80	581.07	
5/19/2023	592.87	12.16	580.71	
6/8/2023	592.87	12.79	580.08	
7/25/2023	592.87	11.89	580.98	
8/29/2023	592.87	12.08	580.79	
9/21/2023	592.87	11.35	581.52	
10/19/2023	592.87	11.45	581.42	
11/14/2023	592.87	12.23	580.64	
12/7/2023	592.87	11.56	581.31	
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
	1/26/2023	590.96	10.50	580.46
	2/21/2023	590.96	10.26	580.70
3/15/2023	590.96	10.06	580.90	
4/25/2023	590.96	10.77	580.19	
5/19/2023	590.96	11.14	579.82	
6/8/2023	590.96	11.77	579.19	
7/25/2023	590.96	11.02	579.94	
8/29/2023	590.96	11.13	579.83	
9/21/2023	590.96	10.34	580.62	
10/19/2023	590.96	10.33	580.63	
11/14/2023	590.96	11.11	579.85	
12/7/2023	590.96	10.35	580.61	

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
	1/26/2023	590.69	10.68	580.01
2/21/2023	590.69	9.82	580.87	
3/15/2023	590.69	9.54	581.15	
4/25/2023	590.69	10.39	580.30	
5/19/2023	590.69	10.72	579.97	
6/8/2023	590.69	11.33	579.36	
7/25/2023	590.69	10.52	580.17	
8/29/2023	590.69	10.66	580.03	
9/21/2023	590.69	9.86	580.83	
10/19/2023	590.69	9.91	580.78	
11/14/2023	590.69	10.94	579.75	
12/7/2023	590.69	10.11	580.58	
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
	1/26/2023	590.81	10.18	580.63
2/21/2023	590.81	10.12	580.69	
3/15/2023	590.81	10.03	580.78	
4/24/2023	590.81	10.37	580.44	
5/19/2023	590.81	10.64	580.17	
6/8/2023	590.81	11.46	579.35	
7/25/2023	590.81	10.57	580.24	
8/29/2023	590.81	10.77	580.04	
9/21/2023	590.81	10.15	580.66	
10/19/2023	590.81	10.17	580.64	
11/14/2023	590.81	10.67	580.14	
12/7/2023	590.81	10.14	580.67	

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)
1/26/2023	West	2.315E-04	0.0034	0.2	0.34
2/21/2023	West	2.315E-04	0.0036	0.2	0.36
3/15/2023	West	2.315E-04	0.0052	0.2	0.52
4/24/2023	West	2.315E-04	0.0043	0.2	0.43
5/19/2023	West	2.315E-04	0.0055	0.2	0.55
6/8/2023	West	2.315E-04	0.0048	0.2	0.48
7/25/2023	West	2.315E-04	0.006	0.2	0.60
8/29/2023	West	2.315E-04	0.0054	0.2	0.54
9/21/2023	West	2.315E-04	0.0138	0.2	1.38
10/19/2023	West	2.315E-04	0.0055	0.2	0.55
11/14/2023	West	2.315E-04	0.0043	0.2	0.43
12/7/2023	West	2.315E-04	0.0099	0.2	0.99

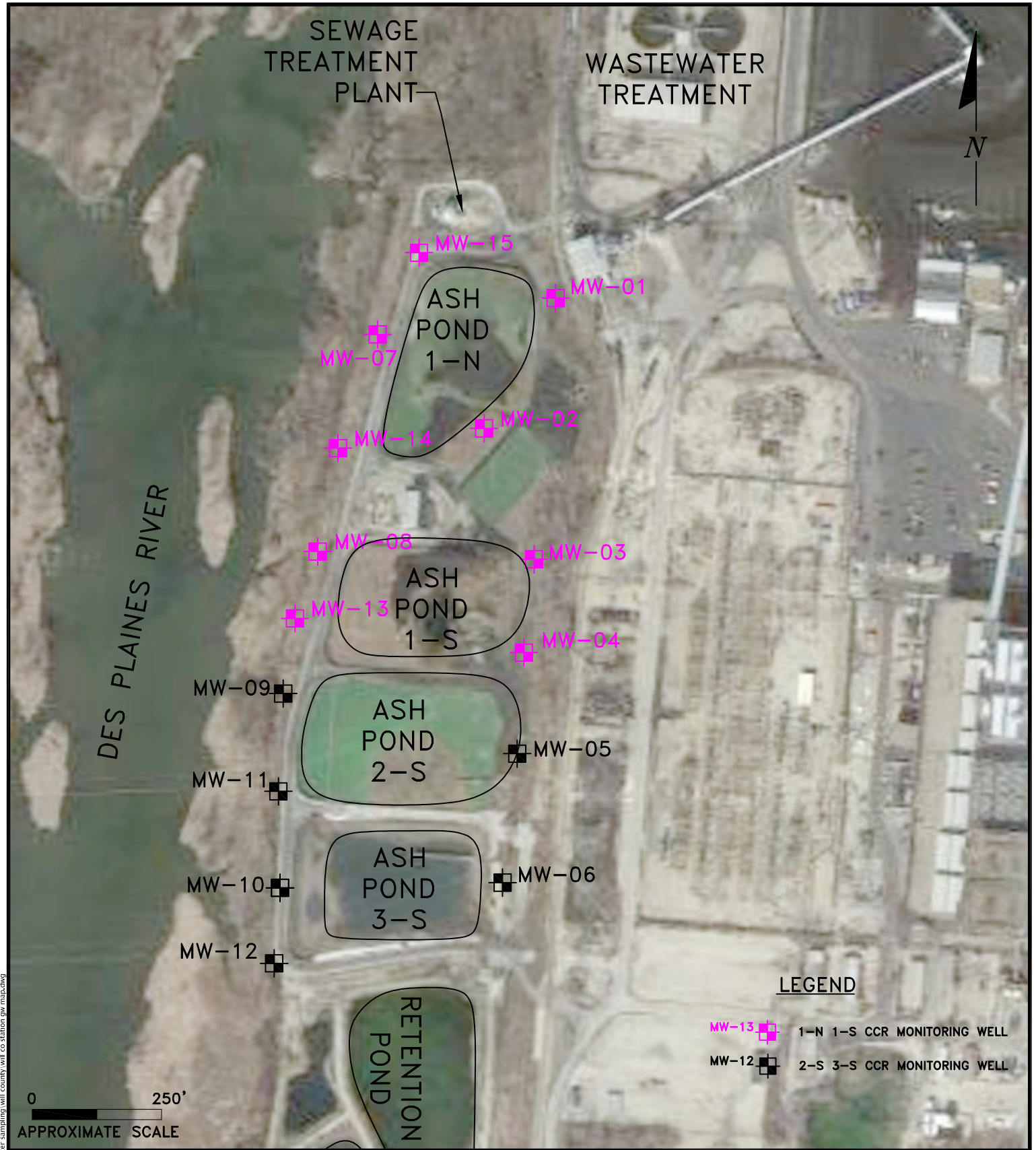
* Kavg - K values from re-evaluation of slug test data as part of groundwater modeling in support of Application for Construction Permit per Illinois State CCR Rule.

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

Table 6. CCR Groundwater Sample Collection Summary for 2023 - Will County Generating Station Ponds 2S/3S

Well ID	Number of Groundwater Sampling Events	Dates Groundwater Sampling Events
MW-05 (Upgradient)	4	2/23/2023
		4/26/2023
		7/26/2023
		10/24/2023
MW-06 (Upgradient)	4	2/23/2023
		4/26/2023
		7/26/2023
		10/24/2023
MW-09 (Downgradient)	4	2/23/2023
		4/26/2023
		7/26/2023
		10/24/2023
MW-10 (Downgradient)	4	2/23/2023
		4/26/2023
		7/26/2023
		10/24/2023
MW-11 (Downgradient)	4	2/21/2023
		4/25/2023
		7/25/2023
		10/19/2023
MW-12 (Downgradient)	4	2/21/2023
		4/25/2023
		7/25/2023
		10/19/2023

FIGURES



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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

SITE MAP

WILL COUNTY STATION
ROMEOLVILLE, ILLINOIS

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

KPRG Project No. 12313.3

FIGURE 1

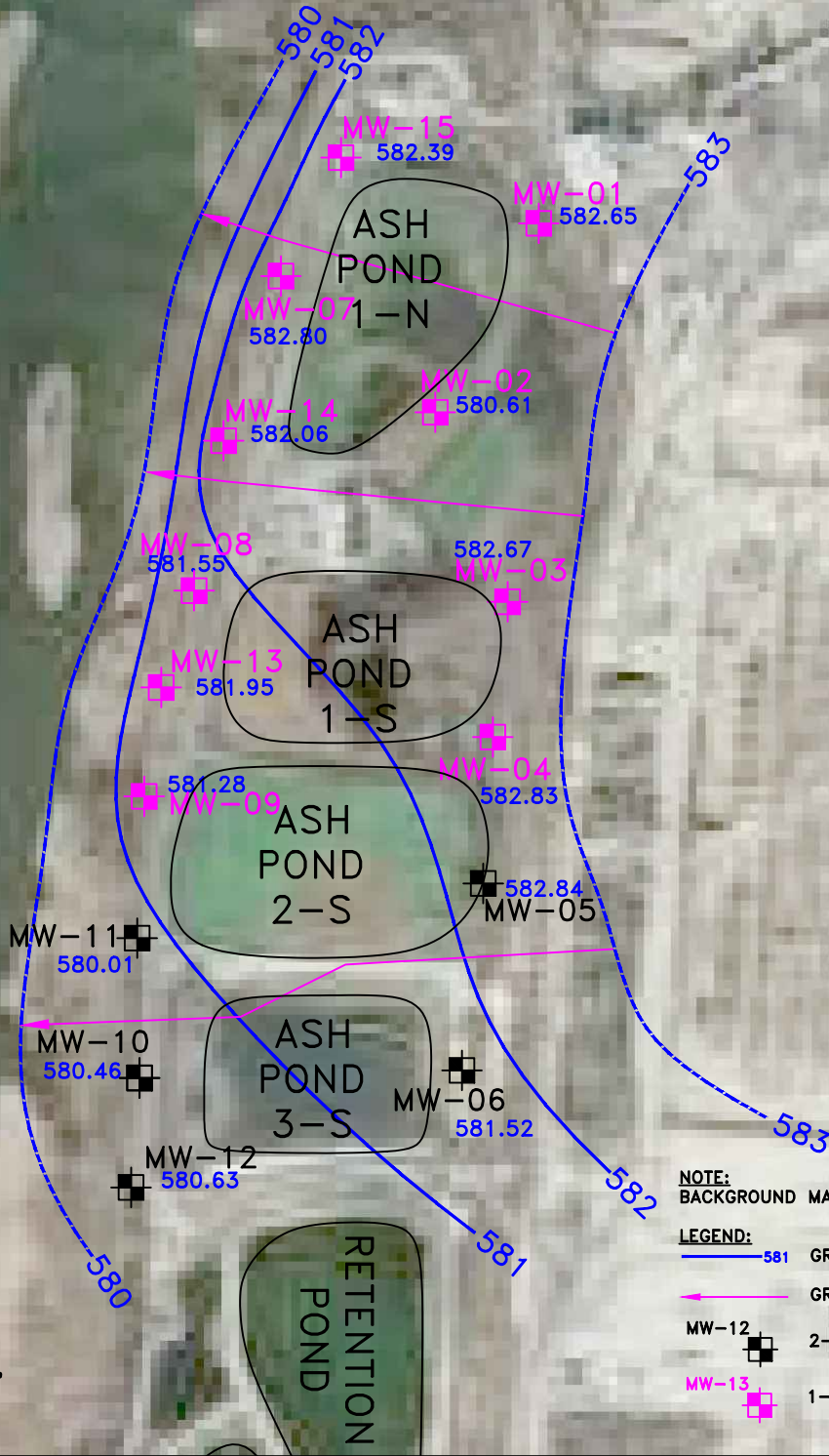
ATTACHMENT 1
Monthly Potentiometric Maps

SEWAGE
TREATMENT
PLANT

WASTEWATER
TREATMENT

N

DES PLAINES RIVER



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

0 250'
APPROXIMATE SCALE

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POTENTIOMETRIC MAP 01/2023

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

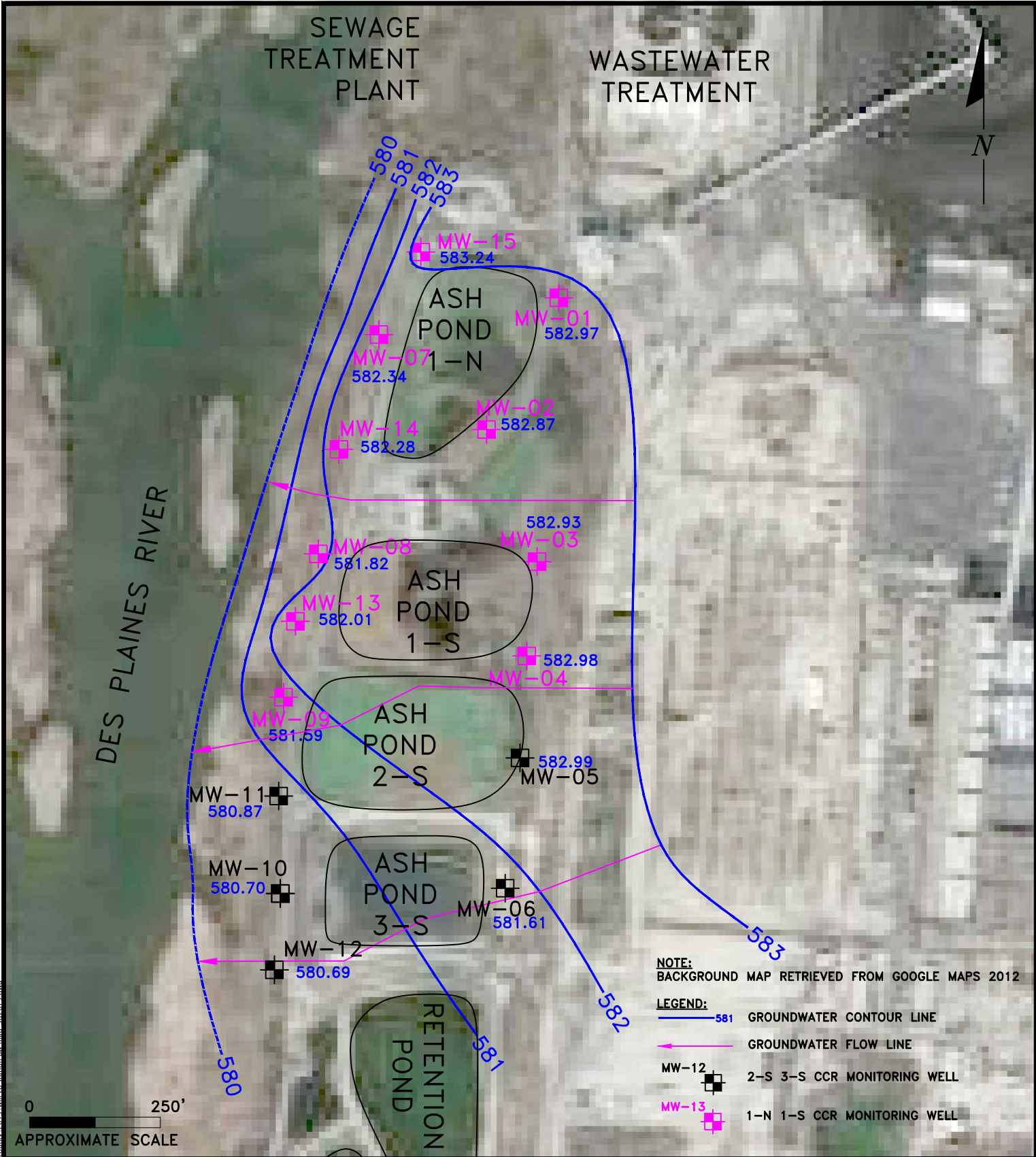
Scale: 1" = 250'

Date: July 5, 2023

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 02/2023

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

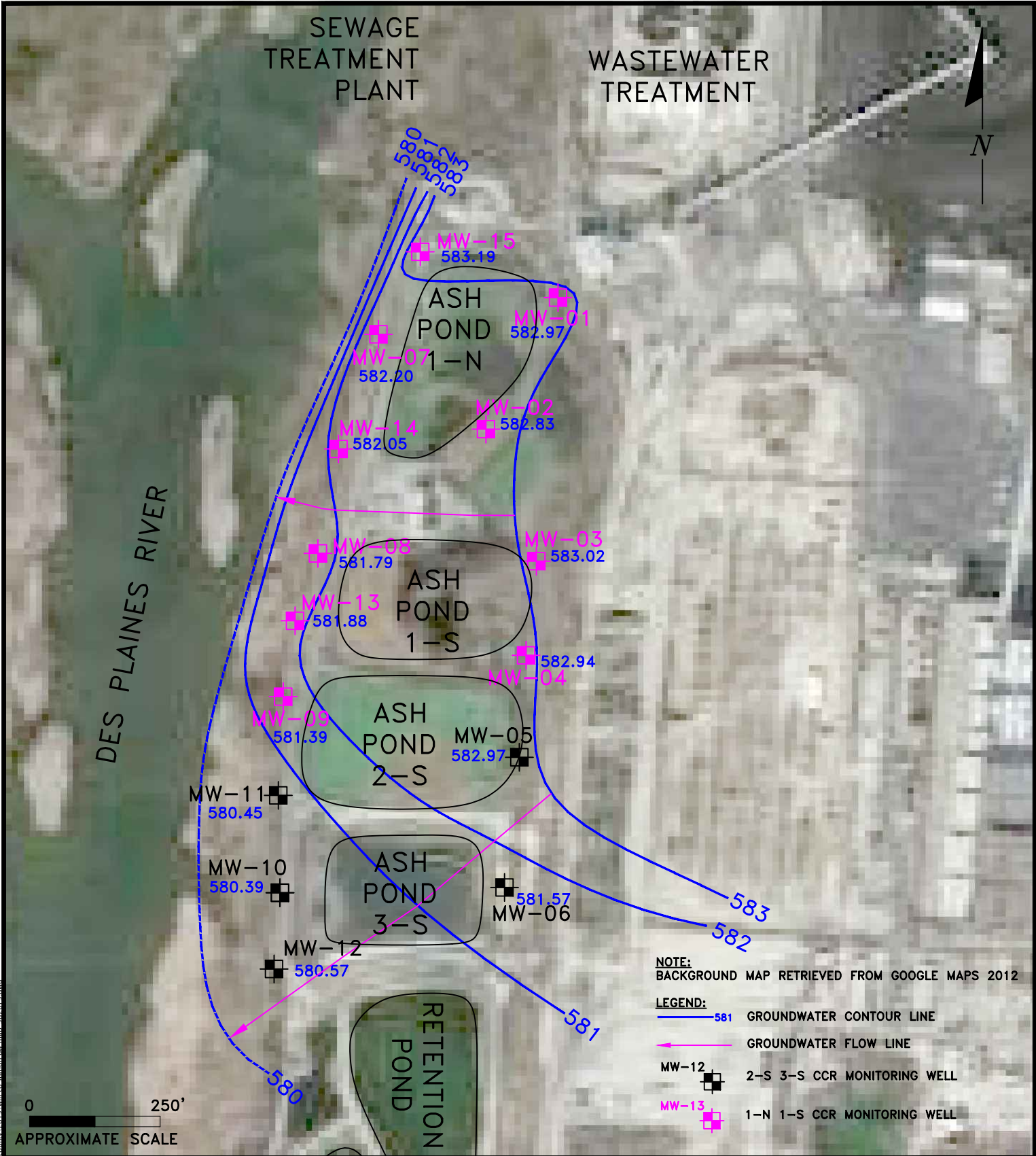
Scale: 1" = 250'

Date: July 5, 2023

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 03/2023

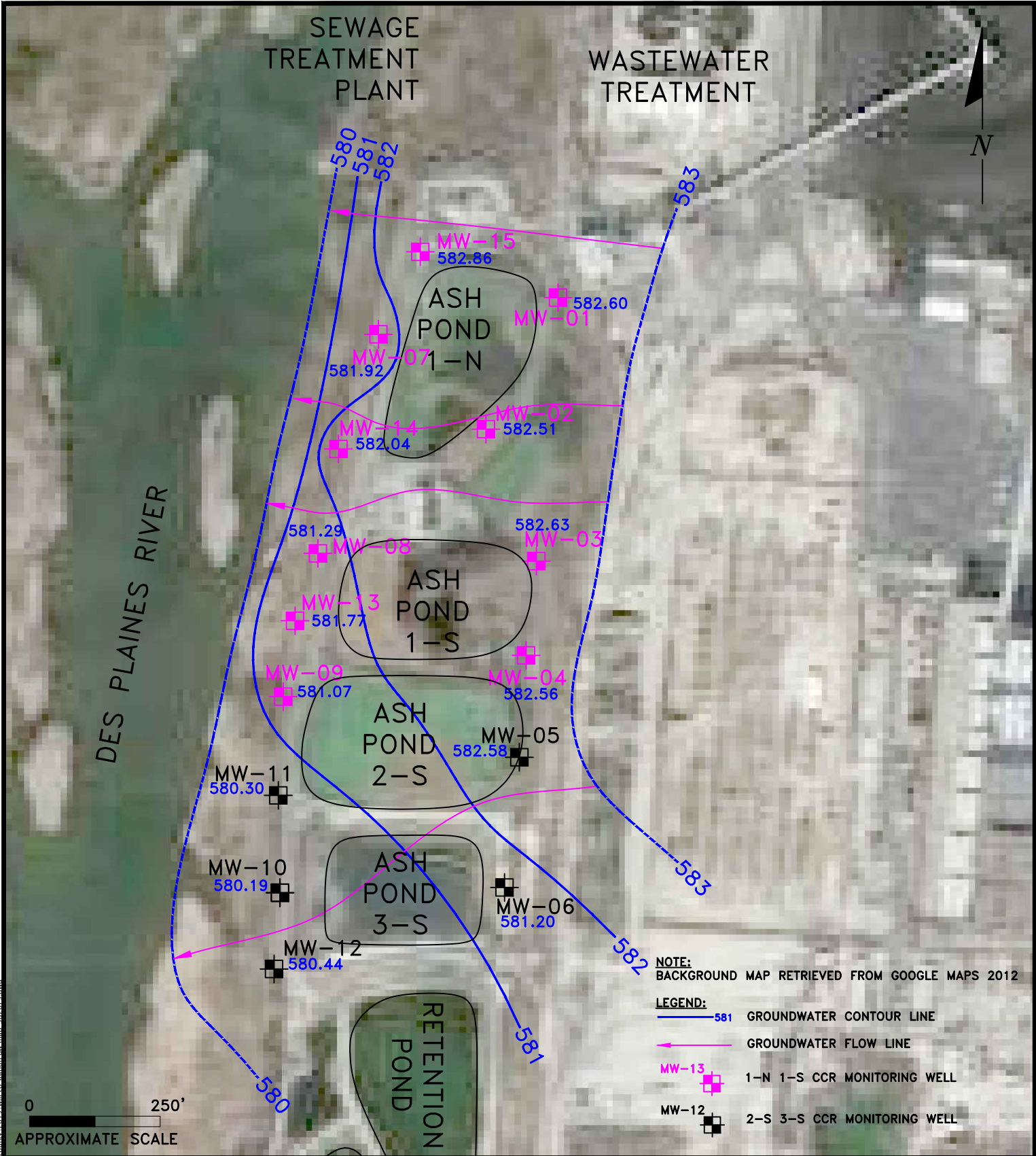
WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS

Scale: 1" = 250'

Date: July 5, 2023

KPRG Project No. 12313.3

ATTACHMENT 1



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POTENTIOMETRIC MAP 04/2023

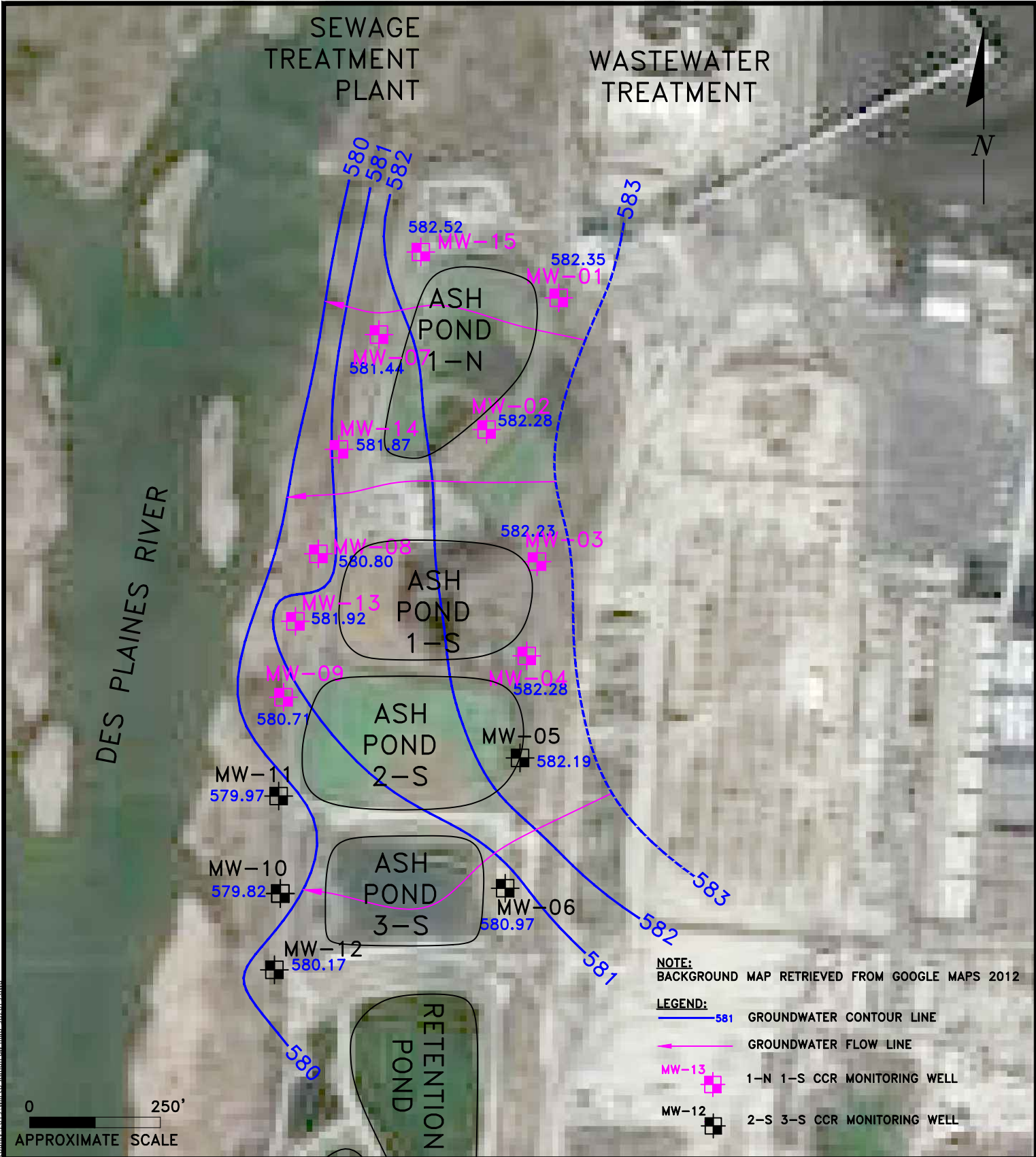
WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS

Scale: 1" = 250'

Date: July 5, 2023

KPRG Project No. 12313.3

ATTACHMENT 1



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POTENTIOMETRIC MAP 05/2023

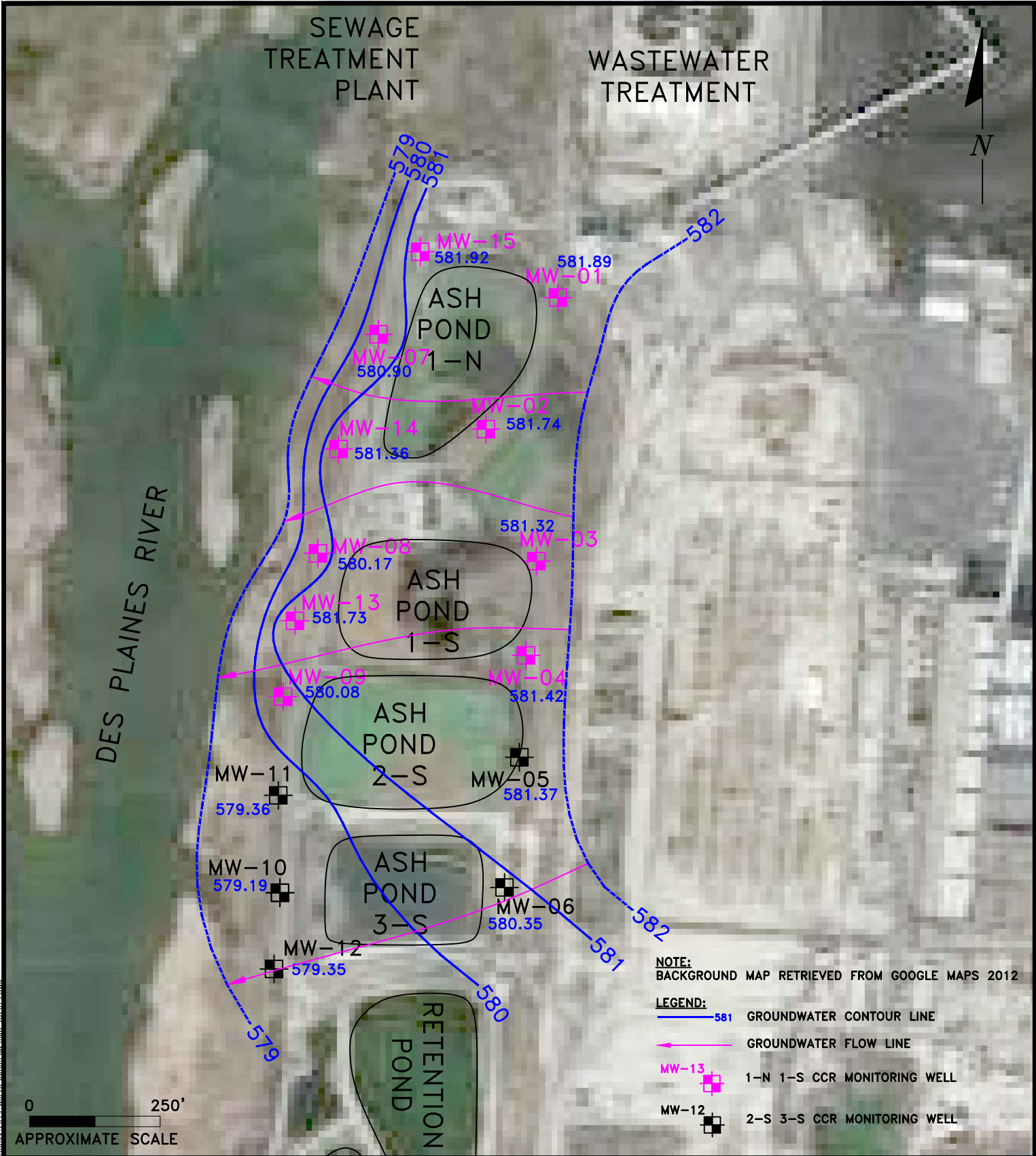
WILL COUNTY STATION, PONDS 2-S 3-S,
ROMEOWILLE, ILLINOIS

Scale: 1" = 250'

Date: July 5, 2023

KPRG Project No. 12313.3

ATTACHMENT 1



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POTENTIOMETRIC MAP 06/2023

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



KPRG and Associates, inc.

Scale: 1" = 250'

Date: July 6, 2023

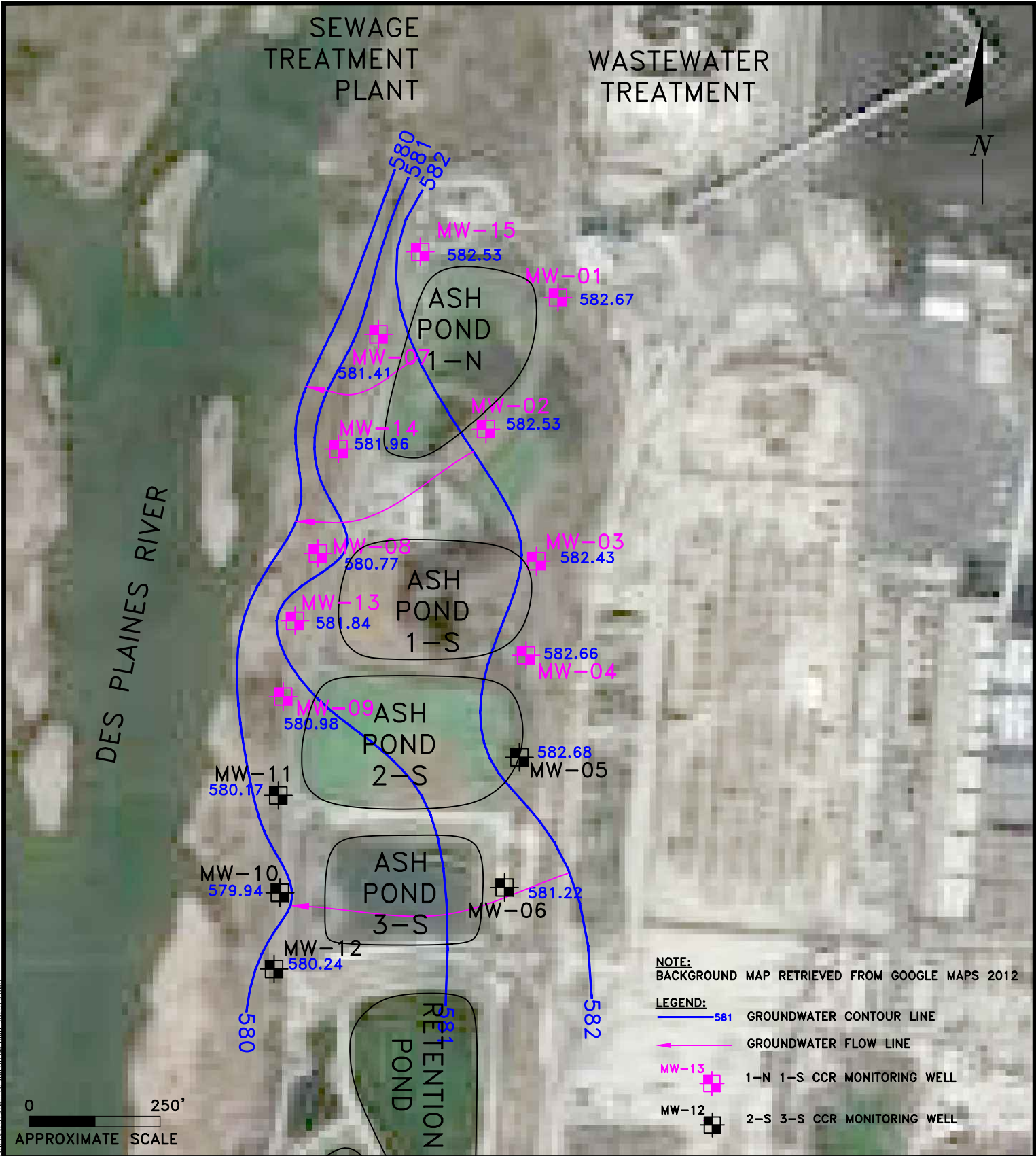
14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

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

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POTENTIOMETRIC MAP 07/2023

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

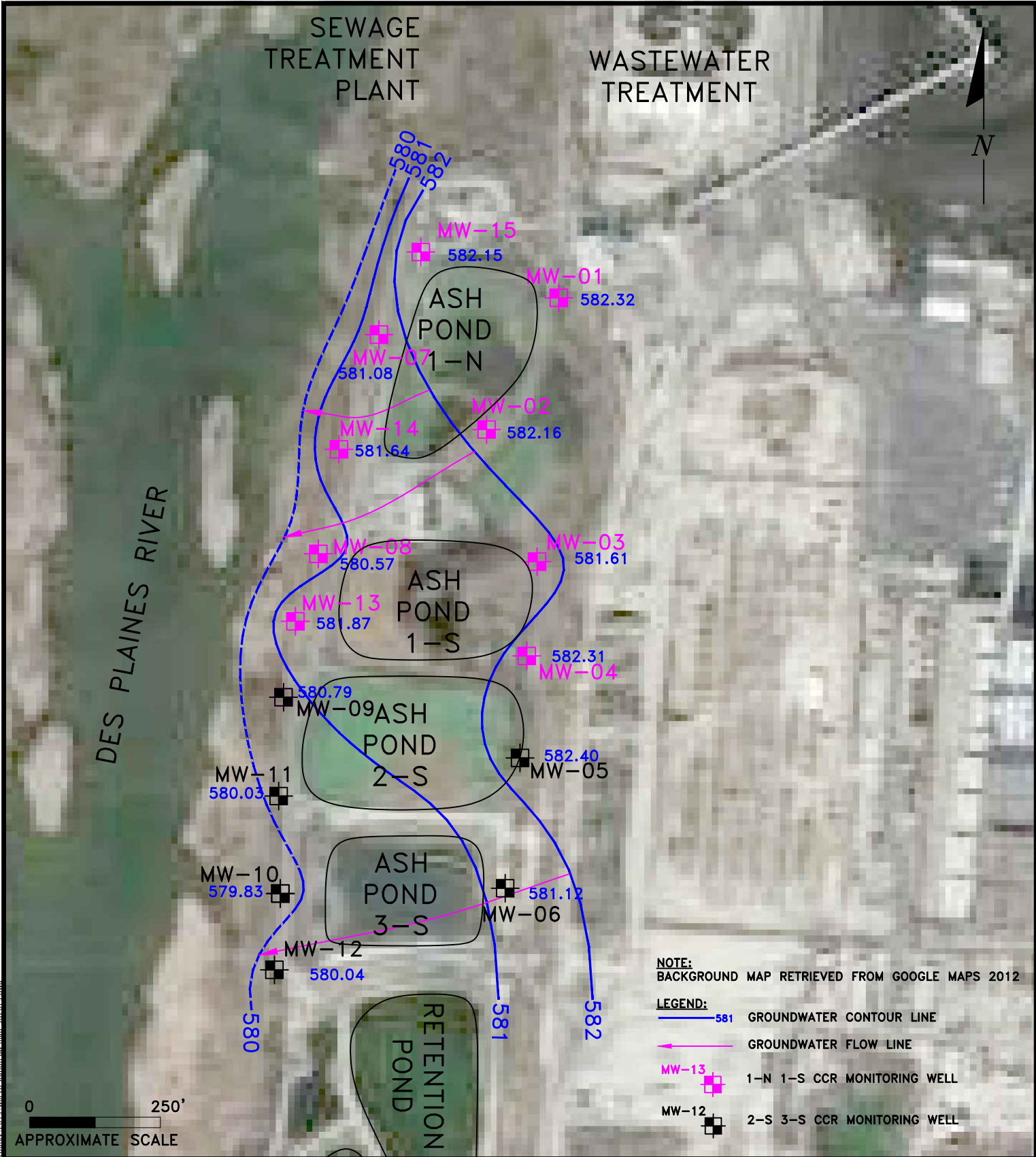
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Date: August 16, 2023

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 08/2023

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

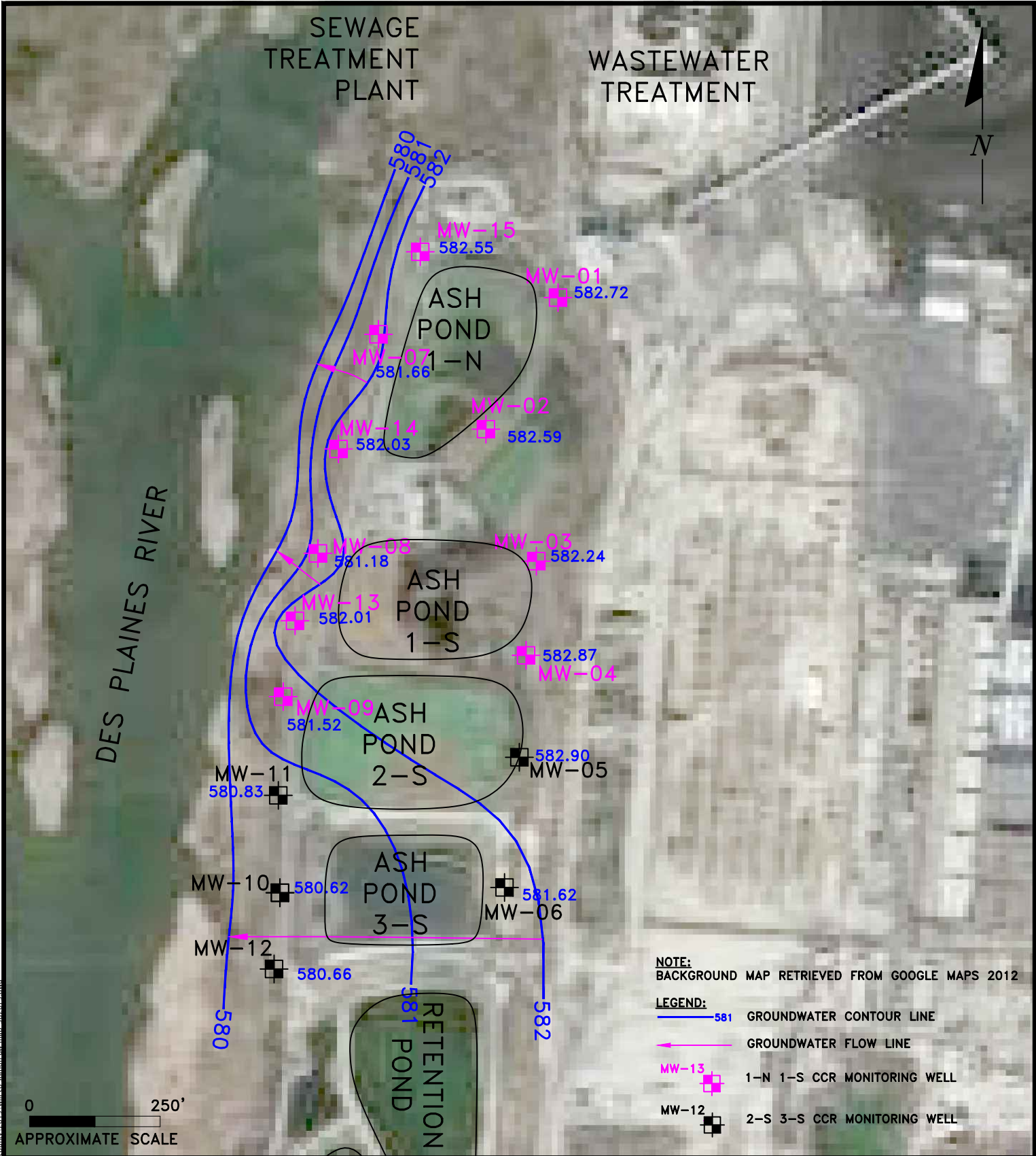
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Date: October 2, 2023

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 09/2023

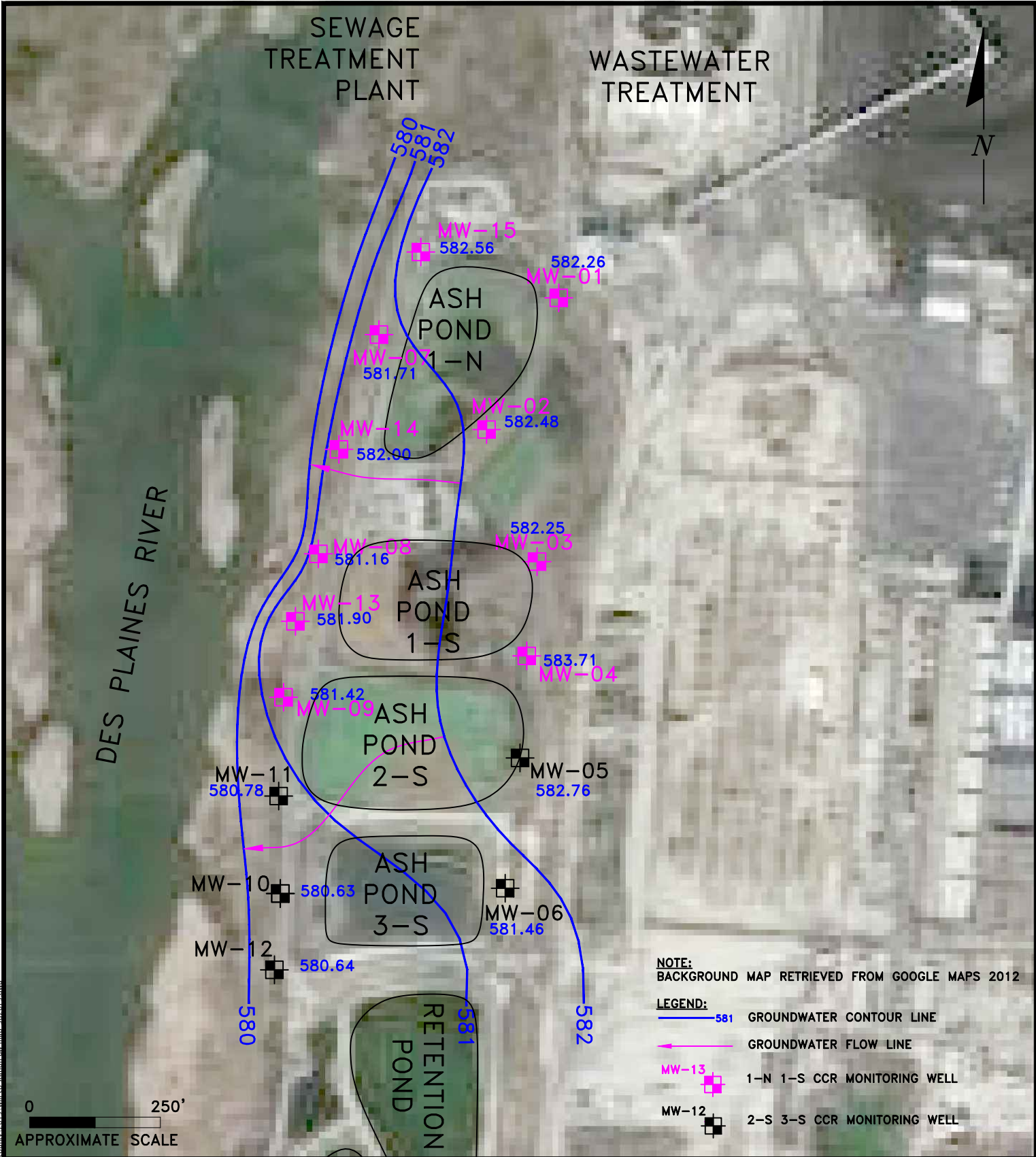
WILL COUNTY STATION, PONDS 2-S 3-S, ROMEOVILLE, ILLINOIS

Scale: 1" = 250' Date: January 5, 2024

KPRG Project No. 12313.3

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POTENTIOMETRIC MAP 10/2023

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

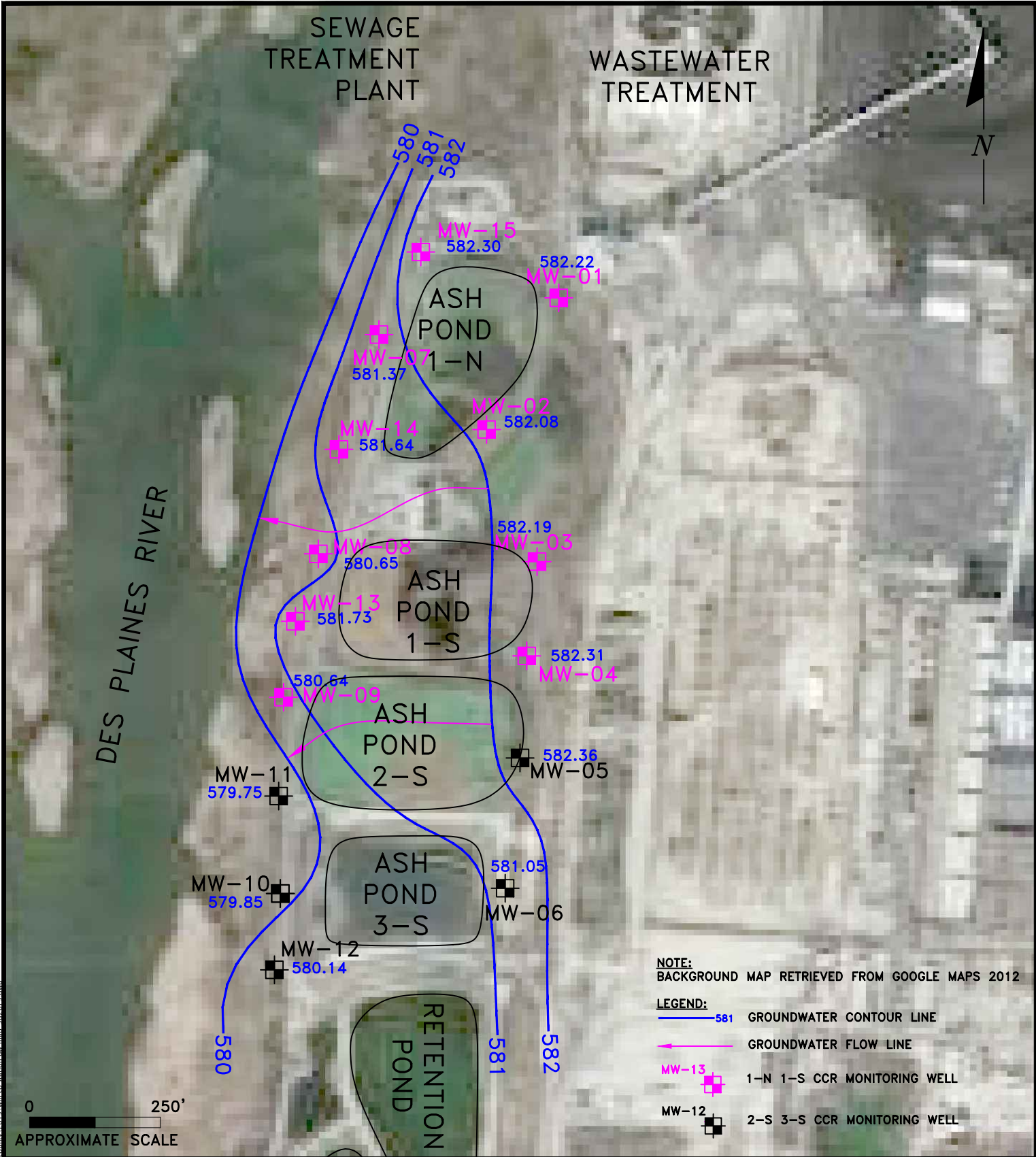
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Date: January 4, 2024

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 11/2023

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

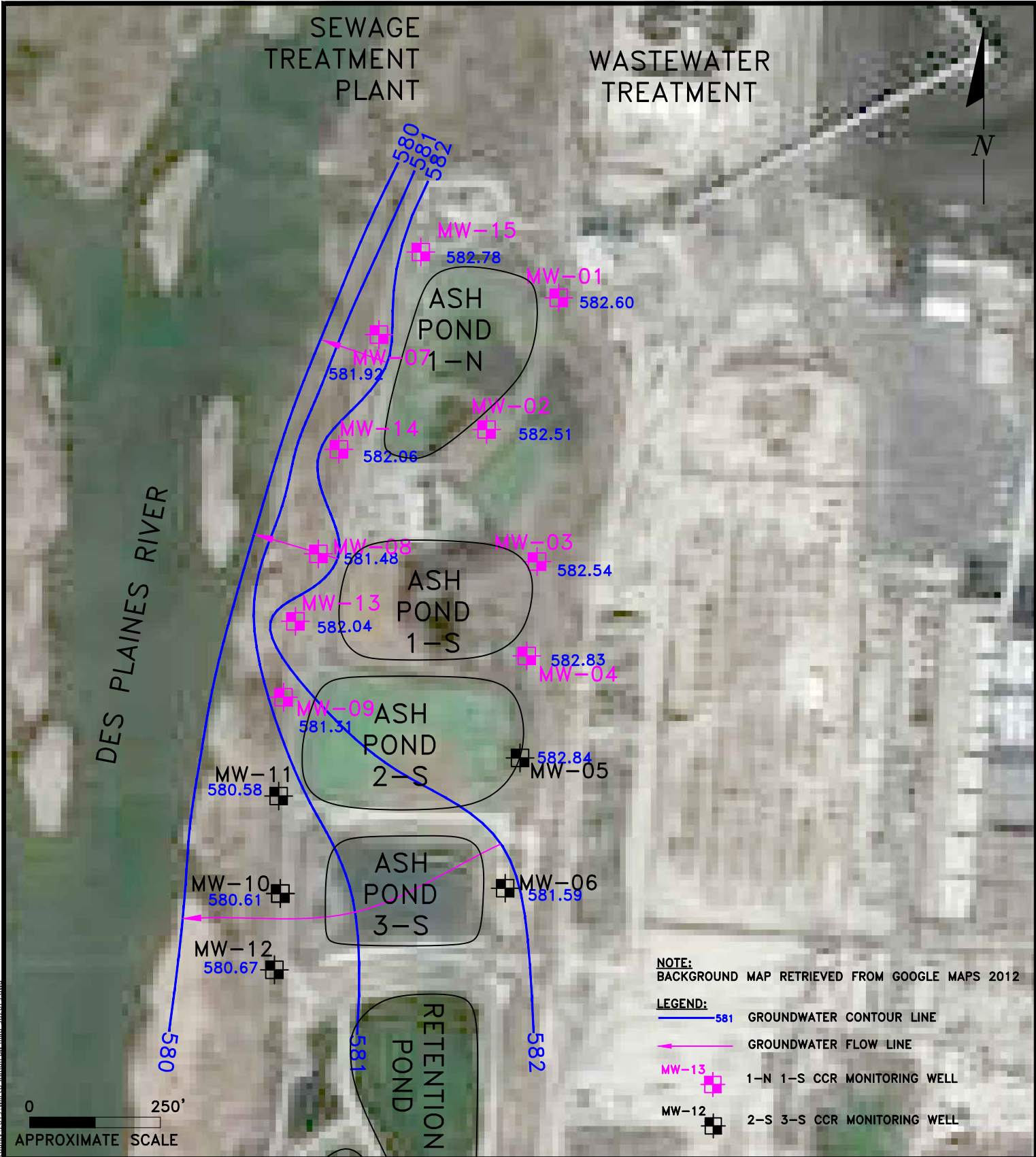
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Date: January 4, 2024

KPRG Project No. 12313.3

ATTACHMENT 1

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POTENTIOMETRIC MAP 12/2023

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

Scale: 1" = 250'

Date: January 4, 2024

KPRG Project No. 12313.3

ATTACHMENT 1

ATTACHMENT D
MONTHLY SURFACE IMPOUNDMENT
WATER ELEVATIONS

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
	1/26/2023	Below gauge	Below gauge
	2/21/2023	DRY	588.3
	3/15/2023	DRY	588.3
	4/25/2023	DRY	588.3
	5/19/2023	DRY	588.3
	6/8/2023	DRY	588.3
	7/25/2023	DRY	588.3
	8/29/2023	DRY	588.3
	9/21/2023	DRY	588.3
10/19/2023	DRY	588.3	
11/17/2023	DRY	588.3	
12/7/2023	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
	1/26/2023	3.2	585.2
	2/21/2023	2.8	584.8
	3/15/2023	2.5	584.5
	4/25/2023	1.6	583.6
	5/19/2023	1.4	583.4
	6/8/2023	0.7	582.7
	7/25/2023	1.4	583.4
	8/29/2023	1.4	583.4
	9/21/2023	1.8	583.8
10/19/2023	2.0	584	
11/14/2023	1.5	583.5	
12/7/2023	1.2	583.2	