

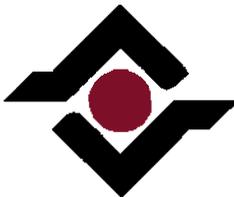
**City Water, Light & Power  
Coal Combustion Residuals Landfill**

**Annual Groundwater Monitoring and Cor-  
rective Action Report  
Year Ending December 31, 2017**

**January 2018**



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## Annual Groundwater Monitoring and Corrective Action Report

City Water, Light and Power (CWLP) owns and operates an existing non-hazardous special waste landfill (FGDS Development), which is permitted to dispose of flue gas desulfurization sludge, bottom ash, fly ash, and lime sludge related to operation of the CWLP power generating station. The existing Unit 2 was permitted by the Illinois Environmental Protection Agency (Illinois EPA) in 1995 and was constructed pursuant to 35 Illinois Administrative Code (IAC) Part 811 (Standards for New Solid Waste Landfills) and maintains an active permit (No. 1995-243-LFM). The coal combustion residual (CCR) landfill has been constructed and is operated in the same manner as a permitted municipal solid waste landfill.

The Illinois landfill regulations (Title 35: Environmental Protection, Subtitle G: Waste Disposal), were derived to be compliant with the Resource Conservation and Recovery Act Subtitle D landfill regulations (40 CFR Part 258 – Criteria for Municipal Solid Waste Landfills). The design, construction, operation and monitoring of the FGDS Development landfill has been and is being conducted pursuant to the aforementioned regulations. The use of 40 CFR Part 258 in derivation of the 40 CFR Part 257 regulations is well documented in 40 CFR Part 257. In fact, the Preamble to 40 CFR Part 257 states “the requirements do not apply to... (7) municipal solid waste landfills (MSWLF) that receive CCR.” The inference is that units meeting 40 CFR Part 258 are constructed and operated as to minimize the potential for environmental impact and are monitored by a regulatory authority, in this case, the Illinois EPA.

Groundwater monitoring at the FGDS Development landfill is conducted pursuant to the Groundwater Monitoring Program approved by the Illinois EPA. The wells contained in the program are sampled and analyzed on a quarterly basis for a list of parameters that promote early detection of a leak from the disposal unit (routine indicator parameters). The data obtained from the analyses are reported to the Illinois EPA on a quarterly basis, including identification of any statistically significant increase. Any data obtained as part of assessment monitoring or corrective action would also be reported to the Illinois EPA on a schedule approved in the facility permit.

By May 1 of each year, an Annual Report (Condition IX.2) is filed with the Illinois EPA that contains information relating to monitoring data from the groundwater monitoring network from the previous year. Included in the Annual Report is a summary of the monitoring data, dates of submittal of comprehensive monitoring data to the Illinois EPA, statistical summaries and analysis of trends, changes to the monitoring program, discussion of error analysis, detections limits and observed trends, and identification of new monitoring stations to be installed within the next year.