



Dianna Tickner
Illinois Power Resource Generating, LLC
1500 East Port Plaza Drive
Collinsville, IL 62234

November 17, 2020

Mr. Darin LeCrone, P.E.
Manager, Industrial Unit, Permit Section
Illinois Environmental Protection Agency
Bureau of Water, Compliance Section
1021 N. Grand Avenue East
Springfield, IL 62794-9276

Re: Duck Creek Power Station - Ash Pond Nos. 1 & 2
Notice of Availability for Extension of Closure Timeframe
40 C.F.R. § 257.106(i)(6)

Mr. LeCrone:

In accordance with 40 C.F.R. § 257.102(f)(2)(i), Illinois Power Resource Generating, LLC ("IPRG") has made a demonstration that an extension to complete the closure of Ash Pond No 1 & 2 at the Duck Creek Power Station is warranted. The closure plans for these units will be amended to reflect a new closure date of no later than December 31, 2020. The attached demonstrations prepared by the construction consultant Civil & Environmental Consultants, Inc. (CEC) satisfy 40 C.F.R. § 257.102(f)(2)(i). These demonstrations will be posted in the operating record as required by 40 C.F.R. § 257.105(i)(6) and website as required by 40 C.F.R. § 257.106(i)(6).

Per 40 C.F.R. § 257.102(f)(2)(iii), IPRG makes the following certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Should you have any questions regarding the attached data, please feel free to address them to Matt Ballance at 618/792-7274 or matt.ballance@vistracorp.com

Sincerely,
Illinois Power Resources Generating, LLC

A handwritten signature in black ink that reads "Dianna Tickner".

Dianna Tickner
Director – Decommission and Demolition

**DEMONSTRATION FOR EXTENSION OF CLOSURE TIMEFRAMES
ASH POND NO. 1 - DUCK CREEK POWER STATION**

EXTENSION OF CLOSURE TIMEFRAMES – 40 C.F.R. §257.102(f)(2)(i)


On November 18, 2015, Illinois Power Resources Generating, LLC (IPRG) took steps necessary to implement the Closure Plan for Ash Pond No. 1 at the Duck Creek Power Station. Accordingly, the default deadline to complete closure of Ash Pond No. 1 within the five-year timeframe provided by 40 C.F.R. § 257.102(f)(1)(i) is November 17, 2020.

However, 40 C.F.R. § 257.102(f)(2)(i)(A)-(B) provides for extensions of this deadline “due to factors beyond the facility’s control,” including “[c]omplications stemming from the climate and weather, such as unusual amounts of precipitation or a significantly shortened construction season” or “[t]ime required to dewater a surface impoundment due to the volume of CCR contained in the CCR unit or the characteristics of the CCR in the unit”

Closure of Ash Pond No. 1 and Ash Pond No. 2 is being completed as part of the same construction project. Ash Pond No. 1 is eligible for an extension of the November 17, 2020 deadline due to extended dewatering timeframes to adequately lower the phreatic surface within Ash Pond No. 1 to allow the safe completion of the final stages of construction and the seasonal weather changes with shorter days and lower temperatures that minimize optimum construction conditions. The construction has seen over 45 weather/rain days plus additional days for pumping of surface water, dewatering of exposed CCR and drying of the surfaces to allow for construction to restart. To manage the water, the sumps and dewatering ditches required additional excavation to remove sediment and reestablish the sump area and drainage pathways. As closure construction on Ash Pond No. 1 approaches completion through the fall and winter seasons, the collection of surface water and water from dewatering activities has become isolated to a sump area and adjacent exposed CCR areas. The sump area and exposed CCR areas have not dewatered or stabilized due to periodic heavy precipitation events and lower temperatures prohibiting the CCR from drying or stabilizing to allow for safe construction of the final cover system. Based on the foregoing factors beyond the facility’s control, IPRG is justified in an extension of the November 17, 2020 default closure deadline. IPRG expects closure to be completed by December 31, 2020.

CERTIFICATION STATEMENT – 40 C.F.R. § 257.102(f)(2)(iii)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE: 
Duane Lanoue, P.E., Principal

DATE: November 17, 2020

**DEMONSTRATION FOR EXTENSION OF CLOSURE TIMEFRAMES
ASH POND NO. 2 - DUCK CREEK POWER STATION**

EXTENSION OF CLOSURE TIMEFRAMES – 40 C.F.R. §257.102(f)(2)(i)


On November 18, 2015, Illinois Power Resources Generating, LLC (IPRG) took steps necessary to implement the Closure Plan for Ash Pond No. 2 at the Duck Creek Power Station. Accordingly, the default deadline to complete closure of Ash Pond No. 2 within the five-year timeframe provided by 40 C.F.R. § 257.102(f)(1)(i) is November 17, 2020.

However, 40 C.F.R. § 257.102(f)(2)(i)(A)-(B) provides for extensions of this deadline “due to factors beyond the facility’s control,” including “[c]omplications stemming from the climate and weather, such as unusual amounts of precipitation or a significantly shortened construction season” or “[t]ime required to dewater a surface impoundment due to the volume of CCR contained in the CCR unit or the characteristics of the CCR in the unit”

Closure of Ash Pond No. 1 and Ash Pond No. 2 is being completed as part of the same construction project. Ash Pond No. 2 is eligible for an extension of the November 17, 2020 deadline due to extended dewatering timeframes to adequately lower the phreatic surface within Ash Pond No. 2 to allow the safe completion of the final stages of construction and the seasonal weather changes with shorter days and lower temperatures that minimize optimum construction conditions. The construction has seen over 45 weather/rain days plus additional days for pumping of surface water, dewatering of exposed CCR and drying of the surfaces to allow for construction to restart. To manage the water, the sumps and dewatering ditches required additional excavation to remove sediment and reestablish the sump area and drainage pathways. As closure construction on Ash Pond No. 2 approaches completion through the fall and winter seasons, the collection of surface water and water from dewatering activities has become isolated to a sump area and adjacent exposed CCR areas. The sump area and exposed CCR areas have not dewatered or stabilized due to periodic heavy precipitation events and lower temperatures prohibiting the CCR from drying or stabilizing to allow for safe construction of the final cover system. Based on the foregoing factors beyond the facility’s control, IPRG is justified in an extension of the November 17, 2020 default closure deadline. IPRG expects closure to be completed by December 31, 2020.

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