



Illinois Power Resources Generating, LLC  
Luminant  
1500 Eastport Plaza Drive  
Collinsville, IL 62234

November 30, 2021

Re: Annual Progress Report (§ 257.103(f)(2)(x)) for the Edwards Power Plant Ash Pond

Pursuant to 40 C.F.R. § 257.103(f)(2)(x), Illinois Power Resources Generating, LLC has prepared this “annual progress report documenting the continued lack of alternative capacity and the progress towards the closure of the CCR surface impoundment.”

#### Continued Lack of Alternative Capacity

As set forth in the retirement demonstration dated November 24, 2020 for the Edwards Power Plant Ash Pond, no alternative capacity existed for the CCR and non-CCR waste streams that are being disposed in the Edwards Ash Pond. As EPA explained in the preamble to the proposed Part A revisions, “it would be illogical to require [] facilities [ceasing power generation] to construct new capacity to manage CCR and non-CCR wastestreams.” 84 Fed. Reg. 65,941, 65,956 (Dec. 2, 2019). EPA again reiterated in the preamble to the final revisions that “[i]n contrast to the provision under § 257.103(f)(1), the owner or operator does not need to develop alternative capacity because of the impending closure of the coal fired boiler.” 85 Fed. Reg. 53,516, 53,547 (Aug. 28, 2020). Circumstances have not changed at the Edwards Power Plant, and there are no existing options to dispose of CCR and non-CCR other than in the Edwards Ash Pond. Accordingly, there is a continued lack of alternative capacity at the Edwards Power Plant.

#### Progress Towards Closure

As set forth in the retirement demonstration dated November 24, 2020 for the Edwards Power Plant, boiler operations will cease no later than December 31, 2022, and construction of closure is expected to begin on April 17, 2026 with closure complete by October 17, 2028 as required by 40 C.F.R. 257.103(f)(2)(iv)(B). Circumstances have not changed with respect to the cessation of the boiler and completion of closure activities at the Edwards Power Plant. To date, progress towards closure includes bidding and awarding an engineer service firm for the closure design in order for closure of the Ash Pond to be completed by the 2028 deadline. Work has begun to design final closure.

Sincerely,

A handwritten signature in black ink that reads "Cynthia E. Vodopivec".

Cynthia Vodopivec  
Senior Vice President, Environmental Health & Safety