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Illinois Power Resources Generating, LLC
Luminant
6555 Sierra Dr.
Irving, TX 75039

August 1, 2022

Ms. Kirsten Hillyer, Environmental Engineer
Environmental Protection Agency
Office of Resource Conservation & Recovery
Materials Recovery & Waste Management Division
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Edwards Power Plant Alternative Closure Demonstration – Update to Closure Plan

Dear Ms. Hillyer:

Illinois Power Resources Generating LLC (IPRG) is providing the U.S. Environmental Protection Agency (“EPA”) with this update to the closure plan associated with the Edwards Power Plant located near Peoria, Illinois. See 40 C.F.R. § 257.102(b)(3)(i).

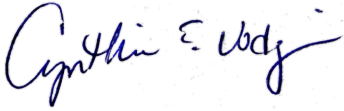
As detailed in the alternative closure demonstration submitted to EPA on November 24, 2020, IPRG requested an extension pursuant to 40 C.F.R. § 257.103(f)(2) so that the Edwards Ash Pond could continue to receive CCR and non-CCR wastestreams after April 11, 2021, and complete closure no later than October 17, 2028. On January 11, 2022, EPA determined that the alternative closure demonstration was complete, thus continuing to toll the deadline to cease receipt of waste at the Edwards Ash Pond.

Following the submittal of the alternative closure demonstration, in April 2021 new Illinois state rules governing the management of CCR in Illinois became effective. In accordance with those new rules, we have submitted various documents to the Illinois EPA regarding the closure of the Edwards Ash Pond. On July 1, 2022, we submitted a construction permit application to Illinois EPA, which is required under the Illinois CCR program, along with a new closure plan detailing the proposed closure approach for the Edwards Ash Pond.

Accordingly, we are updating our closure plan under 40 C.F.R. § 257.102 to incorporate the proposal submitted to Illinois EPA, which will involve consolidating the ash footprint and installing solar panels on the closed impoundment. IPRG’s submission to Illinois EPA of the new proposed closure plan contains relevant information to EPA’s review of IPRG’s alternative closure demonstration and reflects the manner in which the Edwards Ash Pond will be closed if approved by Illinois EPA. The construction permit application submitted to Illinois EPA, which includes the proposed new closure plan, will be posted to Luminant’s public CCR website, along with this letter. This submission should be included by EPA as an update to the administrative record for the Edwards alternative closure demonstration that is currently pending.

An electronic PDF of this letter is being submitted to Richard Huggins, Frank Behan and Kirsten Hillyer via email. Additionally, this letter and the application submitted to Illinois EPA will be posted to Luminant’s public CCR website: www.luminant.com/ccr/. If you have any questions regarding this submittal, please contact Phil Morris at 618-343-7794 or phil.morris@vistracorp.com.

Sincerely,

A handwritten signature in blue ink that reads "Cynthia E. Vodopivec". The signature is written in a cursive style with a large initial 'C' and a distinct 'E'.

Cynthia Vodopivec

SVP – Environmental, Health & Safety