

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

November 25, 2025

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 (IPRG) 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). Up until the Edwards Ash Pond ceased receiving waste as of September 2025, there were no existing options to dispose of CCR and non-CCR other than in the Edwards Ash Pond.

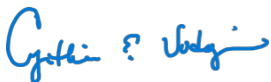
#### Progress Towards Closure

Consistent with the retirement demonstration dated November 24, 2020 for the Edwards Power Plant, boiler operations ceased by 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 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.

On June 30, 2022, the Edwards Power Plant submitted a closure plan to Illinois EPA as part of its construction permit application pursuant to 35 I.A.C § 845.220. On August 1, 2022, a notice was posted on the company’s public CCR website indicating that the closure plan under 40 C.F.R. § 257.102 was updated to incorporate the closure plan previously submitted to Illinois EPA. The construction permit application remains pending before IEPA.

On September 4, 2025, IPRG submitted a request to USEPA to withdraw the pending retirement demonstration submitted for the Edwards Power Plant, indicating that all waste flows to the Ash Pond have now ceased.

Sincerely,



Cynthia Vodopivec  
Senior Vice President – Environmental, Health & Safety