

Cynthia Vodopivec
Kincaid Generation, LLC
6555 Sierra Dr.
Irving, TX 75039

November 25, 2025

Mr. Frank Behan
Environmental Protection Agency
Office of Resource Conservation & Recovery
Materials Recovery & Waste Management Division
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Kincaid Power Plant Alternative Closure Demonstration – Update to Schedule and Closure Plan

Dear Mr. Behan:

Kincaid Generation, LLC (Kincaid) hereby submits this update to the closure schedule and closure plan associated with the alternative closure demonstration for the Kincaid Power Plant near Kincaid, Illinois. As detailed in the alternative closure demonstration submitted to EPA on November 25, 2020, Kincaid requested an extension pursuant to 40 C.F.R. § 257.103(f)(2) so that the Ash Pond may continue to receive CCR and non-CCR wastestreams after April 11, 2021, and complete closure no later than October 17, 2028. Under 40 C.F.R. 257.103(f)(2)(iv)(B), “the coal-fired boiler(s) must cease operation, and the CCR surface impoundment must complete closure no later than October 17, 2028.”

As described in the alternative closure demonstration, based on available information at the time, Kincaid projected that Units 1 and 2 at the Kincaid Power Plant would cease operation by July 17, 2027. However, due to recent reliability and market conditions in PJM, Kincaid now projects that Units 1 and 2 will be in operation until no later than November 30, 2027. This update is consistent with § 257.103(f)(2)(iv)(B), which requires that “the coal-fired boiler(s) must cease operation . . . no later than October 17, 2028.”

Updating the boiler cessation date will have no impact on the pond closure schedule, the absence of alternative disposal capacity both on and off-site of the facility, the risk mitigation plan, the groundwater monitoring system, or closure plan. Kincaid is providing an updated Section 6.0 and Table 6-1 contained in the original alternative closure application that was submitted to EPA in November 2020, which reflects boiler cessation by November 30, 2027 and completion of pond closure by October 17, 2028. See Attachment 1.

Furthermore, Kincaid submitted a construction permit application to the Illinois EPA on July 28, 2022 for closure of the ash pond pursuant to the Illinois CCR program, and the closure methodology in that application is consistent with the new planned boiler cessation date. The Illinois closure application remains pending. In August 2022, we submitted a letter to USEPA indicating that we updated our federal closure plan under 40 C.F.R. § 257.102 to incorporate the proposal submitted to Illinois EPA in our construction permit application. On November 25, 2025, we submitted an update to Illinois EPA, indicating that the boiler cessation date in the closure plan has changed and that the amount of CCR that will be generated before the plant retires has changed. See Attachment 2.

This submission and its attachments should be included by EPA as an update to the administrative record for the Kincaid alternative closure demonstration that is currently pending.

This letter and its attachments 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 618-606-7788 or phil.morris@vistracorp.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cynthia Vodopivec".

Cynthia Vodopivec

SVP – Environmental, Health & Safety

Attachment 1

6.0 DOCUMENTATION OF CLOSURE COMPLETION TIMEFRAME

To demonstrate that the criteria in § 257.103(f)(2)(iv) has been met, “the owner or operator must submit the closure plan required by § 257.102(b) and a narrative that specifies and justifies the date by which they intend to cease receipt of waste into the unit in order to meet the closure deadlines.” The closure plan for the Ash Pond, along with an addendum, is included as Attachment 9.

In order for a CCR surface impoundment over 40 acres to continue to receive CCR and non-CCR wastestreams after the initial April 11, 2021, deadline, the coal-fired boiler(s) at the facility must cease operation and the CCR surface impoundment must complete closure no later than October 17, 2028. As discussed below, Kincaid began sitework to support the closure of the Ash Pond in the Spring of 2025, the two boilers will cease coal-fired operations no later than November 30, 2027, and Kincaid will subsequently cease placing wastestreams into the Ash Pond in order for closure to be completed by this deadline.

Table 6-1 is included below to summarize the major tasks and estimated durations associated with closing the Ash Pond in place. These durations are consistent with the durations experienced with the closure of approximately 500 acres of other CCR impoundments already completed by Kincaid Generation and its affiliates to date as noted below:

- Baldwin Fly Ash Pond System – 230 acres closed in-place with an approximate 30-month construction schedule
- Hennepin West Ash Ponds System – 35 acres closed in-place with an approximate 24-month construction schedule (includes closure by removal of an adjacent 6-acre settling pond and installing a sheet pile wall)
- Hennepin East Ash Ponds 2 and 4 – 25 acres closed in-place with an approximate 6-month construction schedule
- Coffeen Ash Pond 2 – 60 acres closed in-place with an approximate 24-month construction schedule
- Duck Creek Ash Ponds 1 and 2 – 130 acres closed in-place with an approximate 24-month construction schedule

Each CCR impoundment closure indicated above utilized a coordinated passive or gravity dewatering method, which consisted of the use of trenches excavated to lower the phreatic surface in portions of the impoundment to obtain a stable ash surface to permit the safe construction of the final cover system. The phreatic water in the trenches flows by gravity to sumps constructed within the impoundment. The major benefit associated with this passive or gravity dewatering method is that the sumps are designed to provide

holding time to allow the TSS to settle within the impoundment prior to discharge (an active dewatering method with wells would result in increased amounts of unsettled TSS). After solids settling, the water is discharged through the NPDES outfall in compliance with permitted limits.

Construction progressed sequentially as the dewatering of an area stabilized the ash surface. The CCR was graded to subgrade level, then overlain with the compacted clay layers and/or geomembrane liners. Vegetative soil cover was then placed on top of the infiltration layer. As each section of the impoundment was closed, this sequencing progressed to the completion of the pond closure. A similar process will be utilized to close the Kincaid Ash Pond in order to allow the final open section of the impoundment to be large enough for the impoundment to remain in operation until the pond ceases the receipt of waste. This would provide sufficient time for closure to be completed by October 17, 2028.

The first construction effort will involve modifying the pond operations by relocating the influent lines, minimizing the pond water levels, and isolating flow to a smaller portion of the current 172-acre impoundment that can be closed during the last two construction seasons. The smaller active portion of the pond will remain in operation while Kincaid Generation begins dewatering and closing the impoundment as described above. This reduction in footprint may require the addition of chemical feeds to provide adequate treatment but that has not been the case at our other sequenced closures. This approach simultaneously allows for continued operation of the plant to maintain generating capacity for the PJM markets and minimizes the risk to the environment both by minimizing the pond size and the potential for any impacts to groundwater and by opening up a significant portion of the remaining impoundment to allow for dewatering, grading, and closure (in Phase 1).

Table 6-1 provides estimates for the durations required to close a portion of the pond footprint after the date noted to begin closure construction (Phase 1), as well as the current estimates for the closure of the active area (Phase 2, remaining 40-50 acres). In order to dewater the closure area, Kincaid Generation will likely release pond water through the existing Outfall E01.

Table 6-1: Kincaid Ash Pond Closure Schedule

Action	Estimated Timeline (Months)
Spec, bid, and Award Engineering Services for CCR Impoundment Closure	3
Finalize CCR unit closure plan and seek IEPA approval for CCR unit closure	8

Action	Estimated Timeline (Months)
<p>Obtain environmental permits:</p> <ul style="list-style-type: none"> State Waste Pollution Control Construction/Operating Permit NPDES Industrial Wastewater Permit Modification (<i>modification would be required to allow the associated ponded and subsurface free liquids generated before the pond closure to be discharged to Waters of the US and to allow reconfiguration of the various wastestreams to either other NPDES-permitted outfalls or newly-constructed NPDES-permitted outfalls</i>) General NPDES Permit for Storm Water Discharges from Construction Site Activities and a SWPPP On July 28, 2022, Kincaid submitted a closure plan to Illinois EPA as part of its construction permit application pursuant to 35 Ill. Admin. Code §845.220. On August 16, 2022, a notice was posted on Kincaid'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 IEPA. The construction permit application before IEPA remains pending. 	21
Spec, bid, and Award Construction Services for CCR Impoundment Closure	3
Begin Sitework to Support Closure	Spring 2025
Minimize Active Area of Impoundment/Dewater Phase 1 Area	6
Regrade CCR Material in Phase 1 Area	18
Install Cover System – Phase 1 Area*	13
Establish Vegetation – Phase 1 Area**	2
Cease Coal-Fired Operations (No Later Than)	November 30, 2027
Dewater Impoundment – Phase 2 Area	3
Cease Placement of Waste (No Later Than, allowing for plant cleanup and dredging of	February 2028

Action	Estimated Timeline (Months)
impoundments following coal pile and plant closure)	
Regrade CCR Material – Phase 2 Area	5
Install Cover System– Phase 2 Area*	5
Establish Vegetation, Perform Site Restoration Activities, Complete Closure, and Initiate Post-Closure Care**	2
Total Estimated Time to Complete Closure	73 months
Date by Which Closure Must be Complete	October 17, 2028

* Activity expected to overlap with grading operations, finishing 2 months after grading is completed.

** Activity expected to overlap with cover system installation, finishing 1 month after cover installation is completed.



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Attachment 2

Phil Morris
Kincaid Generation, LLC
1500 Eastport Plaza Drive
Collinsville, IL 62234

November 25, 2025

Illinois Environmental Protection Agency
Bureau of Land – Permits MC #33
Attn: Part 845 Coal Combustion Residual Rule Submittal
2520 West Iles Avenue
Springfield, IL 62704

Re: Kincaid Generation, LLC – Kincaid Power Plant – Site ID 0218140001
Ash Pond – ID W0218140002-01 – Permit Log No. 2021-504
CCR Surface Impoundment Construction Permit Application Supplement

Kincaid Generation, LLC (Kincaid) is hereby submitting a supplement to the closure construction permit application submitted on July 28, 2022. This letter serves as an addendum to the Closure Plan for the Ash Pond at the Kincaid Power Plant which was included in the Final Closure Plan found in Attachment G of the application.

At the time the permit application was submitted the boilers at the Kincaid Power Plant were expected to permanently cease coal combustion in July of 2027. The submitted Closure Plan reflected the expected retirement date at the time of submittal. Kincaid intends to now operate through November of 2027. Despite the change in the plant's retirement date, the closure plan and schedule included in the original application are not affected. The closure activities detailed in the plan are designed to be conducted independently of the plant's operational status. The selected closure method remains the most appropriate closure option for the Ash Pond and the closure alternatives analysis included as Appendix A to the Closure Plan is not affected by the revised plant retirement date.

Additionally, the amount of CCR that will be generated and stored in the impoundment before the plant retires has changed. The 2022 Closure Plan estimated an additional 180,000 cubic yards of CCR would be generated prior to the plant retiring in July of 2027. However, with the extended operation through November of 2027, approximately an additional 15,000 cubic yards of CCR are expected to be generated in 2027.

Should you have any questions or comments regarding the above responses, please contact Rhys Fuller at rhys.fuller@vistracorp.com or (618) 975-1799.

Sincerely,



Phil Morris, P.E.
Sr. Director, Environmental