

Dianna Tickner
Illinois Power Generating Company
1500 Eastport Plaza Drive
Collinsville, IL 62234

August 8, 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 62794-9276

Re: Supplement to Operating Permit Applications for the Coffeen Power Plant – BOL Site ID 1358030005
Ash Pond 1 (W1350150004-01, Log No. 2021-474); Ash Pond 2 (W1350150004-02, Log No. 2021-475); and GMF
Pond System (W1350150004-03/04, Log No. 2021-476 and 2021-477)

As requested by IEPA, as a supplement to the operating permit applications for the coal combustion residual surface impoundments referenced above, enclosed are copies of the following:

- Letter requesting reduction of financial assurance amounts (submitted August 8, 2025)
- 2024 cost estimate (submitted June 21, 2024)
- 2025 cost estimate (submitted June 19, 2025)

If you have any questions regarding this submittal, please contact Rhys Fuller at 618-975-1799 or rhys.fuller@vistracorp.com.

Sincerely,



Dianna Tickner
Senior Director Decommissioning & Demolition

Financial Assurance Reduction Request

Dianna Tickner
Illinois Power Generating Company
1500 Eastport Plaza Drive
Collinsville, IL 62234

August 8, 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 62794-9276

Re: Request to Reduce Financial Assurance at the Coffeen Power Plant Ash Pond 1 (W1350150004-01); Ash Pond 2 (W1350150004-02); and GMF Pond System (W1350150004-03/04) – BOL Site ID 1358030005

On June 21, 2024, Illinois Power Generating Company (“IPGC”) submitted an annual adjustment for inflation to IEPA for the expected remaining costs for (1) closure and post-closure care for Ash Pond 1 (AP1) and the GMF Pond System (GMF) and (2) the preliminary corrective action costs for Ash Pond 2 (AP2) and the GMF Pond System at the Coffeen Power Plant. That cost estimate was developed in accordance with Section 845.930 taking into account the proposed closure method as reflected in the construction permit application submitted to IEPA on July 28, 2022.

Notably, the cost estimate for 2024 was reduced from \$57,145,223 to \$48,722,774. This reduction is based on water treatment costs incurred and reduction due to expenses already incurred by the Corrective Action Plan evaluations. Section 845.980(f)(2) provides that “[w]henver the current cost estimate decreases, the penal sum may be reduced to the amount of the current cost estimate following written approval by the Agency.” IPGC originally requested written approval from IEPA to reduce the financial assurance required for Coffeen from \$57,145,223 to \$48,722,774 in a July 11, 2024 letter submitted to IEPA.

On June 19, 2025 IPGC submitted an additional annual adjustment for inflation for the expected remaining costs. Since the 2024 inflation adjustment, IPGC incurred additional expenses associated with Corrective Action Plan evaluations, including identifying the need for corrective action at AP1. IPGC is now requesting written approval from IEPA to reduce the financial assurance for Coffeen from \$57,145,223 to \$55,258,100 as indicated in the table below.

Coffeen	Original	Revised
Closure and Post-Closure Care (AP1)	\$ 15,770,529	\$ 16,624,901
Closure and Post-Closure Care (GMF)	\$ 32,375,772	\$ 26,881,803
Corrective Action (AP1)	\$ -	\$ 4,156,225
Corrective Action (GMF)	\$ 8,093,943	\$ 6,720,451
Corrective Action (AP2)	\$ 904,979	\$ 874,720
Total	\$ 57,145,223	\$ 55,258,100

If you have any questions regarding this submittal, please contact Rhys Fuller at 618-975-1799 or rhys.fuller@vistracorp.com.

Sincerely,

A handwritten signature in blue ink, reading "Dianna Tickner". The signature is fluid and cursive, with the first name "Dianna" and last name "Tickner" clearly distinguishable.

Dianna Tickner
Senior Director Decommissioning & Demolition

2024 Cost Estimate



Dianna Tickner
Illinois Power Generating Company

Luminant
1500 Eastport Plaza Drive
Collinsville, IL 62234

June 21, 2024

Illinois Environmental Protection Agency
DWPC – Permits MC #15
Attn: Part 845 Coal Combustion Residual Rule Submittal
1021 North Grand Avenue, East
Springfield, IL 62794-9276

Re: Annual Cost Estimate Adjustment for Inflation for Closure, Post-Closure, and Preliminary Corrective Action at the Coffeen Power Plant Ash Pond 1 (W1350150004-01); Ash Pond 2 (W1350150004-02); and GMF Pond System (W1350150004-03/04)

Pursuant to 35 I.A.C. 845.940, Illinois Power Generating Company ("IPGC") submits this annual adjustment for inflation to the expected remaining costs for (1) closure and post-closure care and (2) the preliminary corrective action costs for the Ash Pond 1 and GMF Pond System at the Coffeen Power Plant. IPGC is providing the estimated "total cost for closure and post-closure care" that remain to be incurred under Part 845 along with a preliminary corrective cost estimate "that is equal to 25% of the costs" that remain to be incurred for closure and post-closure care. 35 I.A.C. 845.930(b), (c). This cost estimate takes into account the proposed closure method as reflected in the construction permit application submitted to IEPA on July 28, 2022. The inflation adjustment was derived by "by using an inflation factor derived from the annual Implicit Price Deflator for Gross National Product (Deflator) as published by the U.S. Department of Commerce in its Survey of Current Business (Table 1.1.9)." 35 I.A.C. 845.940(a).

Taking into account the requirements of 35 I.A.C. 845.930(b)—including the use of "prevailing wages" (845.930(b)(3)); the exclusion of any zero costs for CCR that might have an economic value (845.930(b)(5)); and the exclusion of any salvage value of the facility, structures, or equipment (845.930(b)(4))—IPGC estimates that the remaining closure and post-closure care costs at its existing CCR surface impoundments at Coffeen are \$15,914,745 for Ash Pond 1 and \$25,537,017 for the GMF Pond System. The requirements of Part 845 result in the cost estimates overstating the actual expected future costs. Thus, this is not a reasonably probable cost that is reasonably estimable at this time.

In accordance with 35 I.A.C. 845.930(c)(1), IPGC's preliminary corrective action cost estimate is \$6,384,254 for the GMF Pond System. Ash Pond 1 does not have a release that has caused an exceedance of the groundwater protection standard in Section 845.600 or groundwater quality standard in 35 Ill. Adm. Code 620. For the closed inactive CCR surface impoundment at Coffeen, IPGC's preliminary corrective action cost estimate is \$886,758 for Ash Pond 2.

The closure and post-closure estimates for existing CCR surface impoundments were developed to comply with Part 845 and derived based on the construction process and items detailed below.

A professional engineering firm has been retained to complete the Ash Pond 1 and GMF Pond System closure design and preparation of the construction bid documents, and those designs are reflected in the construction permit application submitted to IEPA on July 28, 2022. A contractor will be selected to complete the closure and final cover construction. Construction management ("CM") and construction quality assurance ("CQA") will be performed during Ash Pond 1 and GMF Pond System closure by qualified CM and CQA companies/engineering firms.

Free liquids will be eliminated by removing the liquid waste from Ash Pond 1 and the GMF Pond System to facilitate closure by leaving the coal combustion residuals ("CCR") in place. The Secondary cell of the GMF Pond System will be dewatered as necessary to facilitate closure by removing the CCR. Water removed from both the Ash Pond 1 and GMF Pond System will be discharged through the NPDES-permitted outfalls. The removal of free liquids from Ash Pond 1 and the Primary cell of the GMF Pond System will result in the stabilization of the remaining CCR to provide a stable subgrade base for the final cover system. Dewatering for the Secondary cell of the GMF Pond System will be performed to the extent needed to allow CCR to be removed.

The CCR in Ash Pond 1 and the Primary cell of the GMF Pond System will be consolidated, shaped, and graded to the design subgrade limits and elevations. The soils for the final cover systems will be placed on top of a low permeability geomembrane layer which will overlay the subgrade layer to achieve final cover design grades.

Ash Pond 1 and the Primary cell of the GMF Pond System final cover system construction will be initiated upon the mobilization of the construction contractor to the ponds. The existing Ash Pond 1 and Primary cell of the GMF Pond System and necessary surrounding areas will be cleared of vegetation and structures (removal or abandonment) to allow for the construction of the CCR subgrade.

The GMF Pond System closure construction will be initiated upon the mobilization of the construction contractor. CCR will be removed from the Secondary cell of the GMF Pond System. The existing liner system in the Secondary cell of the GMF Pond System will be removed, and necessary structures will be removed or abandoned. The former Secondary cell area of the GMF Pond System will be restored by regrading and the placement of soil fill materials as needed.

In accordance with 40 C.F.R. Part 257 and the process in 35 I.A.C. 845.750(c) that allows IEPA to approve an alternative cover, the Ash Pond 1 and Primary cell of the GMF Pond System final cover will include:

- A low permeability layer consisting of a linear low-density polyethylene (LLDPE) geomembrane that is at least 40-mil in thickness, placed on a smooth CCR subgrade;
- A drainage layer; and
- A final protective layer consisting of 18 inches of protective cover soil with a 6-inch layer of topsoil capable of supporting vegetation.

The final cover surfaces of the Primary and Secondary cells of the GMF Pond System and Ash Pond 1 will be seeded and vegetated and will also include necessary storm water management system components to promote positive drainage and to minimize erosion. Technical information supporting the alternative cover demonstration is included in the construction permit application documents. Access roads will be constructed as part of the Ash Pond 1 and Primary cell of the GMF Pond System final cover systems to provide access to the closed Ash Pond 1 and GMF Pond System. Upon completion of the closure construction, the contractor will demobilize from the project site.

Post-closure care for the Ash Pond 1 and GMF Pond System will be performed for the duration of the specified post-closure care timeframe. Groundwater monitoring will be performed at the required frequency, and the groundwater monitoring system will be inspected and maintained on a routine basis. Throughout the post-closure care period, periodic visual

observations of the Ash Pond 1 and Primary cell of the GMF Pond System final cover systems and stormwater management systems will be performed. If repairs are required, the repair activities may include, but are not limited to, replacing and compacting soil cover, repairing eroded drainage channels, filling in depressions with soil, regrading, and reseeding repaired and existing vegetated areas as necessary.

The scope of any groundwater corrective action is not known at this time, and therefore the preliminary corrective action cost estimate for the existing CCR surface impoundments is based on 25% of the closure and post-closure care cost. For the closed inactive CCR surface impoundments, the preliminary corrective action cost estimate is based on 25% of the post-closure care cost.

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, appearing to read "Dianna Tickner".

Dianna Tickner
Senior Director, Decommissioning & Demolition

2025 Cost Estimate

Dianna Tickner
Illinois Power Generating Company

Luminant
1500 Eastport Plaza Drive
Collinsville, IL 62234

June 19, 2025

Illinois Environmental Protection Agency
DWPC – Permits MC #33
Attn: Part 845 Coal Combustion Residual Rule Submittal
2520 West Iles Avenue
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In accordance with 35 I.A.C. 845.930(c)(1), IPGC’s preliminary corrective action cost estimate is \$6,720,451 for the GMF Pond System. IPGC’s preliminary corrective action cost estimate is \$4,156,225 for Ash Pond 1. For the closed inactive CCR surface impoundment at Coffeen, IPGC’s preliminary corrective action cost estimate is \$874,720 for Ash Pond 2.

The closure and post-closure estimates for existing CCR surface impoundments were developed to comply with Part 845 and derived based on the construction process and items detailed below.

A professional engineering firm has been retained to complete the Ash Pond 1 and GMF Pond System closure design and preparation of the construction bid documents, and those designs are reflected in the construction permit application submitted to IEPA on July 28, 2022. A contractor will be selected to complete the closure and final cover construction. Construction management ("CM") and construction quality assurance ("CQA") will be performed during Ash Pond 1 and GMF Pond System closure by qualified CM and CQA companies/engineering firms.

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Post-closure care for the Ash Pond 1 and GMF Pond System will be performed for the duration of the specified post-closure care timeframe. Groundwater monitoring will be performed at the required frequency, and the groundwater monitoring system will be inspected and maintained on a routine basis. Throughout the post-closure care period, periodic visual observations of the Ash Pond 1 and Primary cell of the GMF Pond System final cover systems and stormwater management systems will be performed. If repairs are required, the repair activities may include, but are not limited to, replacing and

compacting soil cover, repairing eroded drainage channels, filling in depressions with soil, regrading, and reseeding repaired and existing vegetated areas as necessary.

The scope of any groundwater corrective action is not known at this time, and therefore the preliminary corrective action cost estimate for the existing CCR surface impoundments is based on 25% of the closure and post-closure care cost. For the closed inactive CCR surface impoundments, the preliminary corrective action cost estimate is based on 25% of the post-closure care cost.

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