

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

October 30, 2025

Illinois Environmental Protection Agency
2520 West Iles Avenue
P.O. Box 19276
Springfield, IL 62794

Re: Demonstration for Extension to Closure Timeframe
Pursuant to 35 IAC 845.760(b) and 40 CFR 257.102(f)(2)
Illinois Power Resources Generating, LLC Duck Creek Power Plant GMF Pond
BOL Site ID 0578010002; BOW Unit ID W0578010001-04
BOL Permit Log No. 2021-500

Pursuant to 35 I.A.C. § 845.760(b) and 40 CFR 257.102(f)(2) Illinois Power Resources Generating, LLC is providing this demonstration to extend the time necessary to close the GMF Pond at the Duck Creek Power Plant because "it was not feasible to complete closure of the CCR unit within the required timeframes due to factors beyond the facility's control."

This submittal serves as an amendment to the previously submitted closure plan to indicate that the timeframe to complete closure has been revised to prior to April 2028.

Illinois Power Resources Generating, LLC submitted an initial closure construction permit application for the GMF Pond on January 28, 2022. Approximately 44 months have passed and permits required to begin closure construction have not been issued by IEPA. Illinois Part 845 and the federal CCR rule provide that the "[t]ime required or delays caused by the need to coordinate with and obtain necessary approvals and permits from" the state agency can be considered in justifying the need for an extension of the closure deadline. Based on the delay in receiving the closure permit from IEPA and the schedule of closure activities included in the closure plan, it will not be feasible to complete closure of the GMF Pond by the date specified in the closure plan. Therefore, this demonstration justifies an extension of the timeframe for closure by two years.

A courtesy electronic copy of this submittal has been provided to epa.ccr.part845.coordinator@illinois.gov.

If you have any questions, please contact Rhys Fuller at (618) 975-1799 or Rhys.Fuller@vistracorp.com.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Dianna Tickner
Senior Director of Demolition and Decommissioning