

**TRADE SECRET/PUBLIC RECORD CLAIMED EXEMPT - IN PART (TOTAL COST ESTIMATE)**



Dianna Tickner  
Dynergy Midwest Generation, LLC  
Luminant  
1500 Eastport Plaza Drive  
Collinsville, IL 62234

June 21, 2021

Mr. Darin LeCrone, P.E.  
Manager, Industrial Unit  
Bureau of Water, Division of Water Pollution Control, Permits Section  
Illinois Environmental Protection Agency  
1021 North Grand Avenue, East  
Springfield, IL 62794-9276

Re: Cost Estimate for Closure, Post-Closure, and Preliminary Corrective Action at the Vermilion Power Plant Old East/North Ash Pond System (W1838000002-01/03) and New East Pond Cell 1 & 2 (W1838000002-04)

Dear Mr. LeCrone:

Pursuant to 35 I.A.C. 845.930(a), Dynergy Midwest Generation, LLC ("DMG") submits this written cost estimate for (1) closure and post-closure care and (2) the preliminary corrective action costs for the Old East/North Ash Pond System and New East Ash Pond located at the Vermilion Power Plant. DMG is providing the "total cost for closure and post-closure care" under Part 845 along with a preliminary corrective cost estimate "that is equal to 25% of the costs" for closure and post-closure care. 35 I.A.C. 845.930(b), (c).

**Trade Secret/Public Record Claimed Exempt**

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))—DMG estimates that the closure and post-closure care costs are \$ [REDACTED] for the Old East/North Ash Pond System and \$ [REDACTED] for the New East Ash Pond. The requirements of Part 845 result in the cost estimate overstating the actual expected future costs.

**Trade Secret/Public Record Claimed Exempt**

In accordance with 35 I.A.C. 845.930(c)(1), DMG's preliminary corrective action cost estimates are \$ [REDACTED] for the Old East/North Ash Pond System, and \$ [REDACTED] for the New East Ash Pond.

**Trade Secret/Public Record Claimed Exempt**

The closure and post-closure estimates were derived based on the construction process and items detailed below.

A professional engineering firm will be retained to complete the Old East/North Ash Pond System, and New East Ash Pond closure design and preparation of the construction bid documents. A contractor will be selected to complete the closure construction. Construction management ("CM") and construction quality assurance ("CQA") will be performed during Old East/North Ash Pond System, and New East Ash Pond closure by qualified CM and CQA companies/engineering firms.

The Old East/North Ash Pond System, and New East Ash Pond will be dewatered as necessary to facilitate closure by removing the coal combustion residuals ("CCR"). Water removed from the Old East/North Ash Pond System and New East

Ash Pond will be discharged through the NPDES-permitted outfalls. Dewatering will be performed to the extent needed to allow CCR removal activities to be completed.

The closure construction will be initiated upon the mobilization of the construction contractor to the Old East/North Ash Pond System and New East Ash Pond. The existing Old East/North Ash Pond System and New East Ash Pond and necessary surrounding areas will be cleared of vegetation and structures (removal or abandonment) to allow for the removal of the CCR.

CCR will be removed from the Old East/North Ash Pond System and New East Ash Pond. The former Old East/North Ash Pond System and New East Ash Pond areas will be restored by regrading and placement of soil fill materials as needed.

The former Old East/North Ash Pond System and New East Ash Pond areas will be seeded and vegetated, and will include necessary storm water management system components to promote positive drainage and to minimize erosion. Upon completion of the Old East/North Ash Pond System and New East Ash Pond closure construction, the contractor will demobilize from the project site.

Upon completion of closure by removal for the Old East/North Ash Pond System and New East Ash Pond, groundwater monitoring will be continued as per 35 I.A.C. 845.740(b). Groundwater monitoring will be performed at the required frequency, and the groundwater monitoring system will be inspected and maintained on a routine basis.

The scope of any groundwater corrective action is not known at this time, and therefore the preliminary corrective action cost estimate is based on 25% of the closure and 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](mailto:phil.morris@vistracorp.com).

Sincerely,

A handwritten signature in blue ink that reads "Dianna Tickner". The signature is written in a cursive style.

Dianna Tickner  
Director Decommissioning & Demolition