

Dianna Tickner
Dynergy Midwest Generation, LLC
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 Vermilion Power Plant – BOL Site ID 1830605002
Old East/North Ash Pond System (W1838000002-01/03, Log No. 2021-478) and New East Pond Cell 1 & 2
(W1838000002-04, Log No. 2021-479)

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
Dynergy Midwest Generation, LLC
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 Vermilion Power Plant Old East/North Ash Pond System
(W1838000002-01/03) and New East Pond Cell 1 & 2 (W1838000002-04) – BOL Site ID 1830605002

On June 21, 2024, Dynergy Midwest Generation, LLC (“DMG”) submitted an annual adjustment for inflation to IEPA for the expected remaining costs 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. 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 January 31, 2022.

Notably, the cost estimate for 2024 was reduced from \$186,213,880 to \$146,277,966. This reduction is based on removing a 30% contingency figure from the estimate, which was mistakenly included in the 2023 cost estimate. 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.” DMG originally requested written approval from IEPA to reduce the financial assurance required for Vermilion from \$186,213,880 to \$146,277,966 in a July 11, 2024 letter submitted to IEPA.

On June 19, 2025 DMG submitted an additional annual adjustment for inflation for the expected remaining costs. DMG is now requesting written approval from IEPA to reduce the financial assurance for Vermilion from \$186,213,880 to \$150,563,671 as indicated in the table below.

Vermilion	Original	Revised
Closure and Post-Closure Care	\$126,566,945	\$ 130,300,938
Corrective Action	\$ 19,711,051	\$ 20,262,733
Contingency	\$ 39,935,884	\$ -
Total	\$186,213,880	\$ 150,563,671

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

2024 Cost Estimate



Dianna Tickner
Dynergy Midwest Generation, LLC

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 Vermilion Power Plant Old East/North Ash Pond System (W1838000002-01/03) and New East Pond Cell 1 & 2 (W1838000002-04)

Pursuant to 35 I.A.C. 845.940, Dynergy Midwest Generation, LLC (“DMG”) 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 Old East/North Ash Pond System and New East Ash Pond located at the Vermilion Power Plant. DMG 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 January 31, 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))—DMG estimates that the remaining costs for closure and post-closure care are \$126,566,945 for the Old East/North Ash Pond System and for the New East Ash Pond.¹ The requirements of Part 845 result in the cost estimate 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), DMG’s preliminary corrective action cost estimate is \$19,711,051 for the Old East/North Ash Pond System and the New East Ash Pond.

¹ These costs include the demolition of the plant and the construction of an onsite landfill, which are not directly tied to the closure of the impoundments but are included in the amount covered by the financial assurance instrument.

The closure and post-closure estimates 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 Old East/North Ash Pond System, and New East Ash Pond closure design and preparation of the construction bid documents, and those designs are reflected in the construction permit application submitted to IEPA on January 31, 2022. 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 CCR will be hauled to an onsite landfill that will be constructed following plant demolition. 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 vegetated wet to mesic plants appropriate to final hydrology following excavation of the CCR, 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 revised closure and post-closure care cost. The preliminary corrective action cost estimate, however, is not based on the costs associated with plant demolition and construction of a new onsite landfill.

If you have any questions regarding this submittal, please contact Phil Morris at 618-343-7794 or phil.morris@vistracorp.com.

Sincerely,



Dianna Tickner
Director Decommissioning & Demolition

2025 Cost Estimate

Dianna Tickner
Dynergy Midwest Generation, LLC

Luminant
1500 Eastport Plaza Drive
Collinsville, IL 62234

June 19, 2025

Illinois Environmental Protection Agency
DWPC – Permits MC #15
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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 remaining costs for closure and post-closure care are \$130,300,938 for the Old East/North Ash Pond System and for the New East Ash Pond.¹ The requirements of Part 845 result in the cost estimate 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), DMG’s preliminary corrective action cost estimate is \$20,262,733 for the Old East/North Ash Pond System and the New East Ash Pond.

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