

Phil Morris
Dynergy Midwest Generation, LLC
Luminant
1500 Eastport Plaza Drive
Collinsville, IL 62234

December 19, 2024

Mr. Darin LeCrone, P.E.
Manager, Industrial Unit
Bureau of Water, Division of Water Pollution Control, Permits Section
Illinois Environmental Protection Agency
2520 West Iles
Springfield, IL 72794-9276

Re: Baldwin Power Plant – Annual Progress Report to the Notice of Planned Participation to Achieve Permanent Cessation; NPDES Permit (IL0000043)

Dear Mr. LeCrone:

On January 29, 2021, Dynergy Midwest Generation, LLC (DMG) submitted a notice of planned participation (NOPP) to the Illinois Environmental Protection Agency (IEPA), demonstrating that the Baldwin Power Plant's Units 1 and 2 qualify as electric generating units that will achieve permanent cessation of coal combustion no later than December 31, 2028. Pursuant to 40 C.F.R. § 423.19(g)(3), DMG submits this annual progress report.

As stated in the NOPP, the Baldwin Unit 1 and 2 boilers are scheduled to cease coal-fired operations by December 31, 2028. Although Baldwin's currently pending Part A application under the federal CCR rule currently projects a retirement date of December 31, 2025, the company has announced plans to extend coal operations into 2027. Despite the change in the expected retirement date, circumstances have not changed with respect to expected pond closure by October 2028. Pursuant to 40 C.F.R. § 423.19(g)(4)(iii), DMG is certifying that a retirement filing is not currently required in MISO based on the currently projected shutdown of the facility in 2027. However, based on the recently announced shutdown date in 2027, DMG estimates that it would make a retirement filing with MISO no later than December 30, 2026 under current MISO rules.

As required by 40 C.F.R. § 423.19(g)(4), since the submission of the previous progress report on December 20, 2023, DMG has announced it intends to run the plant through 2027 instead of retiring in 2025 as previously indicated in the NOPP submittal. Circumstances have not changed with respect to the expected completion of pond closure activities by October 2028. There have been no other updates to milestones, and no other completed, missed, or delayed milestones since the submission of the previous progress report. A closure construction permit application, as required under 35 IAC Part 845, was prepared and submitted to IEPA on July 28, 2022. Upon IEPA permit approval and issuance, DMG will proceed with the other action items detailed in the revised alternative closure demonstration.

If you have any questions regarding this submittal, please contact Mr. Phil Morris at 618-606-7788 or phil.morris@vistracorp.com.

Sincerely,
Dynergy Midwest Generation, LLC – Baldwin Power Plant

A handwritten signature in blue ink, appearing to read "Phil Morris".

Phil Morris, P.E.
Senior Environmental Director