

October 11, 2021

Illinois Power Resources Generating, LLC
17751 North Cilco Road
Canton, Illinois 61520

**Subject: USEPA CCR Rule and IEPA Part 845 Rule Applicability Cross-Reference
2021 USEPA CCR Rule Periodic Certification Report
Bottom Ash Basin, Duck Creek Power Plant, Canton, Illinois**

At the request of Illinois Power Resources Generating, LLC (IPRG), Geosyntec Consultants (Geosyntec) has prepared this letter to document how the attached 2021 United States Environmental Protection Agency (USEPA) CCR Rule Periodic Certification Report (Report) was prepared in accordance with both the Federal USEPA CCR Rule¹ and the state-specific Illinois Environmental Protection Agency (IEPA) Part 845 Rule². Specific sections of the report and the applicable sections of the USEPA CCR Rule and Illinois Part 845 Rule are cross-referenced in **Table 1**. A certification from a Qualified Professional Engineer for each of the CCR Rule sections listed in **Table 1** is provided in Section 5 of the attached Report. This certification statement is also applicable to each section of the Part 845 Rule listed in **Table 1**.

Table 1 – USEPA CCR Rule and Illinois Part 845 Rule Cross-Reference

Report Section	USEPA CCR Rule		Illinois Part 845 Rule	
3	§257.82 (a)(1-3)	Adequacy of Inflow Design Control System Plan	845.510(a), (c)(1), (c)(3)	Hydrologic and Hydraulic Capacity Requirements / Inflow Design Flood Control System Plan
	§257.82 (b)	Discharge from CCR Unit	845.510(b)	Discharge from CCR Surface Impoundment

¹ United States Environmental Protection Agency, 2015. *40 CFR Parts 257 and 261, Hazardous and Solid Waste Management System, Disposal of Coal Combustion Residuals from Electric Utilities, Final Rule*.

² State of Illinois, Joint Committee on Administrative Rule, Administrative Code (2021). *Title 35: Environmental Protection, Subtitle G: Waste Disposal, Chapter I: Pollution Control Board, Subchapter j: Coal Combustion Waste Surface Impoundment, Part 845 Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments*.

CLOSING

This letter has been prepared to demonstrate that the content and Qualified Professional Engineer Certification of the 2021 Periodic USEPA CCR Rule Certification Report fulfills the corresponding requirements of Part 845 of Illinois Administrative Code listed in **Table 1**.

Sincerely,



Lucas P. Carr, P.E.
Senior Engineer



John Seymour, P.E.
Senior Principal

Duck Creek

**2021 USEPA CCR RULE OPERATING
RECORD PERIODIC CERTIFICATION
REPORT**

§257.82

**BOTTOM ASH BASIN
Duck Creek Power Plant
Fulton County, Illinois**

Submitted to

Illinois Power Resources Generating, LLC

**17751 North Cilco Road
Canton, Illinois 61520**

Submitted by

Geosyntec 
consultants

engineers | scientists | innovators

1 McBride and Son Center Drive, Suite 202
Chesterfield, Missouri 63005

October 11, 2021

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EXECUTIVE SUMMARY

This Periodic United States Environmental Protection Agency (USEPA) Coal Combustion Residuals (CCR) Rule [1] certification report (Periodic Certification Report) for the Bottom Ash Basin (BAB) Pond¹ at the Duck Creek Power Plant (DCPP), also referred to as Duck Creek Power Station (DUC) has been prepared in accordance with Rule 40, Code of Federal Regulations (CFR) §257, herein referred to as the “CCR Rule” [1]. The CCR Rule requires that initial certification for the existing CCR surface impoundment, completed in 2016 and subsequently posted on the Illinois Power Resources Generating, LLC (IPRG) CCR Website ([2]) be updated on a five-year basis. The BAB is an incised CCR surface impoundment, as defined by 40 CFR §257.53. Per §257.73(b); the requirements of §287.73(a)(2) (hazard potential classification), §257.73(a)(3) (emergency action plan), §257.73(2) (structural stability assessment) and §257.73(e) (safety factor assessment) are not applicable to incised CCR surface impoundments.

The initial certification reports developed in 2016 were independently reviewed by Geosyntec ([2], [3]). Additionally, field observations, interviews with plant staff, and evaluations were performed to compare conditions in 2021 at the BAB relative to the 2016 initial certifications. These tasks determined that the BAB meets all requirements for the Inflow Design Flood Control System Plan. **Table 1** provides a summary of the initial 2016 certifications and the updated 2021 periodic certifications.

¹ The BAB Pond is also referred to as ID Number W05780100001-03, BAB Pond by the Illinois Environmental Protection Agency (IEPA); CCR unit ID 205 by IPRG, and IL50716 within the National Inventory of Dams (NID) maintained by the Illinois Department of Natural Resources (IDNR). Within this document it is referred to as the BAB Pond or the BABP.

Table 1 – Periodic Certification Summary

	CCR Rule Reference	Requirement Summary	2016 Initial Certification		2021 Periodic Certification	
			Requirement Met?	Comments	Requirement Met?	Comments
Hazard Potential Classification						
3	§257.73(a)(2)	Document hazard potential classification	Not Applicable	The BAB is an incised CCR surface impoundment [3] and the requirement to perform a hazard potential classification does not apply under the criteria presented in §257.73(a)(2)..		
Emergency Action Plan						
4	§257.73(a)(3)(iv)	Prepare written Emergency Action Plan	Not Applicable	The BAB is an incised CCR surface impoundment [3] and the requirement to prepare an emergency action plan does not apply under the criteria presented in §257.73(a)(3).		
History of Construction						
5	§257.73(c)(1)	Compile a history of construction	Not Applicable	The BAB is an incised CCR surface impoundment [3] and the requirement to prepare an emergency action plan does not apply under the criteria presented in §257.73(c).		
Structural Stability Assessment						
6	§257.73(d)(1)(i)	Stable foundations and abutments	Not Applicable	The BAB is an incised CCR surface impoundment [3] and the requirement to prepare a structural stability assessment does not apply under the criteria presented in §257.73(d).		
	§257.73(d)(1)(ii)	Adequate slope protection				
	§257.73(d)(1)(iii)	Sufficiency of dike compaction				
	§257.73(d)(1)(iv)	Presence and condition of slope vegetation				
	§257.73(d)(1)(v)(A) and (B)	Adequacy of spillway design and management				
	§257.73(d)(1)(vi)	Structural integrity of hydraulic structures				
	§257.73(d)(1)(vii)	Stability of downstream slopes inundated by water body.				
Safety Factor Assessment						
7	§257.73(e)(1)(i)	Maximum storage pool safety factor must be at least 1.50	Not Applicable	The BAB is an incised CCR surface impoundment [3] and the requirement to prepare a structural stability assessment does not apply under the criteria presented in §257.73(e).		
	§257.73(e)(1)(ii)	Maximum surcharge pool safety factor must be at least 1.40				
	§257.73(e)(1)(iii)	Seismic safety factor must be at least 1.00				
	§257.73(e)(1)(iv)	For dike construction of soils that have susceptible to liquefaction, safety factor must be at least 1.20				
Inflow Design Flood Control System Plan						
8	§257.82(a)(1), (2), (3)	Adequacy of inflow design control system plan.	Yes	Flood control system adequately managed inflow and peak discharge during the 25-year, 24-hour, Inflow Design Flood [2].	Yes	Existing IDF reviewed and assessed to be conservative due to a lower normal pool elevation in 2021 due to process water flows no longer being sluiced into the BAB.
	§257.82(b)	Discharge from CCR Unit	Yes	Discharge from the CCR Unit is routed through a NPDES-permitted outfall during both normal and 100-year, 24-hour Inflow Design Flood conditions, after performing updated hydrologic and hydraulic analyses [2].	Yes	

SECTION 1

INTRODUCTION AND BACKGROUND

This Periodic United States Environmental Protection Agency (USEPA) Coal Combustion Residual (CCR) Rule [1] Certification Report was prepared by Geosyntec Consultants (Geosyntec) for Dynegy Midwest Generation, LLC (Dynegy) to document the periodic certification of the Bottom Ash Basin (BAB) at the Duck Creek Power Plant (DUC), located at 17751 North Cilco Road in Canton, Illinois 61520. The location of DUC is provided in **Figure 1**, and a site plan showing the location of the BAB among other closed and open CCR units and non-CCR surface impoundments, is provided in **Figure 2**.



Figure 1 – Site Location Map (from AECOM, 2016)



Figure 2 – Site Plan (from AECOM, 2016)

1.1 BAB Description

The DUC power plant was retired in December of 2019. Prior to retirement, two active CCR surface impoundments – the BAB and the GMF Pond – and one CCR landfill – were used for managing CCRs generated at DUC. This certification report only pertains to the BAB. The BAB is an incised CCR surface impoundment; per §257.73, a hazard potential classification is not required for incised CCR surface impoundments [3].



Figure 3 – Bottom Ash Basin Area Plan (from AECOM, 2016)

The BAB, which is sub-divided into Primary Pond 1, Primary Pond 2, and the Secondary Settlement Pond, as shown in **Figure 3**, served as the wet bottom ash impoundment basin. Within the BAB, Primary Ponds 1 and 2 are essentially identical in design and construction and received sluiced bottom ash from DUC. Prior to retirement of DUC, the Secondary Settlement Pond sub-basin operated as a polishing pond before discharging water into the plant's discharge channel, which led to the Duck Creek Reservoir and a NPDES-permitted outfall. The BAB consists of incised trapezoidal basins that were constructed in 2009. Primary Pond 1 and Primary Pond 2 operated alternatively which each sub-basin operating for approximately one week at a time. While one sub-basin was receiving bottom ash, the other sub-basin was dewatered and the ash was removed [3].

Sluiced bottom ash entered the BAB through Trewana precast modular trenches. Overflow water from the Primary Pond sub-basins flows into the Secondary Settlement Pond sub-basin through a stop-log weir. Outflow from the BAB was transmitted from the Secondary Settlement Pond through a stop-log structure into a 12-in. diameter corrugated high-density polyethylene (HDPE) pipe which flows by gravity into the discharge channel [3].

The BAB is lined with, from bottom to top, a 60-mil geomembrane, 12-in of compacted clay, and an 8-in. thick reinforced concrete slab. The interior side slopes of the BAB were graded at a 7% slope and were constructed to sidewall heights ranging from 5.7 to 9 ft (basin sidewalls below current existing grade) [3].

As formerly operated, the maximum operating pool of the BAB Primary Ponds 1 and 2 was El. 577.3 ft², and the normal pool elevation of the Secondary Settlement Pond was 573.5 ft. The pool elevation in each sub-basin is controlled by the stop log overflow weirs. Most CCR was removed from the BAB after closure; Primary Ponds 1 and 2 were observed by Geosyntec to be dry in May of 2020 and a nominal amount of impounded water was observed in the Secondary Settlement Pond. Only small amounts of CCR were observed to be present adjacent to the outfall structures in Primary Ponds 1 and 2. The BAB is approximately 1.9 acres in size and the perimeter (i.e. crest) length is approximately 1,100 ft. The minimum crest elevation of the BAB is 579.0 ft for Primary Pond 1 and Primary Pond 2 and 578.0 ft for the Secondary Settlement Pond.

The initial certification for the BAB Inflow Design Flood Control System Plan (\$257.82) was completed by AECOM in 2016 and subsequently posted to IPRG's CCR Website [2]. Additional documentation for the initial certification included a detailed operating record report containing calculations and other information prepared for the inflow design flood control system plan by AECOM [3]. This operating record report was not posted to IPRG's CCR Website.

² All elevations are in the North American Vertical Datum of 1988 (NAVD88), unless otherwise noted.

1.2 **Report Objectives**

These following objectives are associated with this report:

- Compare site conditions from 2015/2016, when the initial certifications were developed, to site conditions in 2021, when data for the periodic certification was obtained, and evaluate if updates are required to the §257.82 Inflow Design Flood Control System Plan ([2], [3]).
- Independently review the Inflow Design Flood Control System Plan ([2], [3]) reports to determine if updates may be required based on technical considerations.
- Confirm that the BAB meets all of the requirements associated with §257.82, or, if the BAB does not meet all requirements, provide recommendations for compliance with these sections of the CCR Rule [1].

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SECTION 2

COMPARISON OF INITIAL AND PERIODIC SITE CONDITIONS

2.1 Overview

This section describes the comparison of conditions at the BAB between the start of the initial CCR certification program in 2015 and 2016 (initial conditions) and subsequent collection of periodic certification site data in 2021 (periodic conditions).

2.2 Review of Annual Inspection Reports

Annual onsite inspections for the BAB were performed between 2016 and 2020 ([4], [5], [6], [7], [8]) and were certified by a licensed professional engineer in accordance with §257.83(b). Each inspection report provided the following information, relative to the previous inspection:

- A statement that no changes in geometry of the impounding structure were observed since the previous inspection.
- A statement that no instrumentation was present.
- Approximate volumes of impounded water and CCR at the time of inspection.
- A statement that no appearances of actual or potential structural weakness or other disruptive conditions were observed.
- A statement that no other changes which may have affected the stability or operation of the impounding structure were observed.

In summary, the reports did not indicate any significant changes to the BAB between 2015 and 2020. No signs of instability, structural weakness, or changes which may have affected the operation or stability of the BAB were noted in the annual inspection reports.

2.3 Comparison of Initial to Periodic Site Visits

An initial site visit to the BAB was conducted by AECOM in 2015 and documented with a Site Visit Summary and corresponding photographs [9]. A periodic site visit was conducted by Geosyntec on May 27, 2021, with Mr. Lucas P. Carr, P.E. conducting the site visit. The site visit was intended to evaluate potential changes at the site since the initial certifications were prepared (i.e., modification to the outlet structures or other appurtenances, limits of CCR, maintenance programs, and repairs). The site visit included walking the perimeter of the BAB visually observing conditions, recording field notes, and collecting photographs. The site visit is

documented in a field observation form and photographic log provided in **Appendix A**. A summary of significant findings from the periodic site visit is provided below:

- The DUC power plant was retired in December of 2019 and process water is no longer discharged to the BAB. No impounded water was observed in Primary Ponds 1 and 2, while a small amount of water (i.e., approximately one foot or less) was observed in the Polishing Pond.
- Most CCR was removed from the BAB, except for minor amounts of CCR located adjacent to the spillway structures in Primary Ponds 1 and 2.
- With the DUC power plant retirement, cooling water is no longer being discharged to the channel leading to the Duck Creek cooling pond. If discharge from the BAB were to occur it would be routed into the cooling channel.

2.4 Interview with Power Plant Staff

An interview with Mr. Daryl Johnson and Mr. Brandon Potter of the DUC power plant was conducted by Mr. Lucas P. Carr, P.E. of Geosyntec on May 27, 2021. Mr. Johnson, at the time of the interview, had been employed at DUC for 8 years and was responsible for environmental compliance and completed weekly CCR impoundment inspections on some years, including the BAB, in addition to managing vegetation maintenance. Mr. Potter, at the time of the interview, had been employed at DUC for 10 years and assisted in the inspection and operation of the various CCR impoundments, including the BAB. The interview included a discussion of included a discussion of potential changes that that may have occurred at the BAB since development of the initial certifications ([2], [3])

- Were any construction projects completed for the BAB since 2015, and, if so, are design drawings and/or details available?
 - No construction projects were completed.
- Were there any changes to the purpose of the BAB since 2015?
 - No changes, outside of the plant being closed in December of 2019 and the cessation of CCR disposal activities and process inflows.
- Were there any changes to the to the instrumentation program and/or physical instruments for the BAB since 2015?
 - The BAB does not have instrumentation.

- Have area-capacity curves for the BAB been prepared since 2015?
 - No known area capacity curves have been developed.
- Were there any changes to spillways and/or diversion features for the BAB completed since 2015?
 - No changes have occurred.
- Were there any changes to construction specifications, surveillance, maintenance, and repair procedures for the BAB since 2015?
 - No changes have occurred.

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SECTION 3

INFLOW DESIGN FLOOD CONTROL SYSTEM PLAN - §257.82

3.1 Overview of Initial IDF

The Initial Inflow Design Flood Control System Plan (Initial IDF) was prepared by AECOM in 2016 ([2], [3]), following the requirements of §257.82. The Initial IDF included the following information:

- A hydraulic and hydrologic analysis, performed for the 25-year design flood event because the BAB is an incised CCR surface impoundment, which corresponded to 5.25 inches of rainfall over a 24-hour period.
- The Initial IDF utilized a HydroCAD Version 10 model to evaluate spillway flows and pool level increases during the design flood, with a starting water surface elevation (SWSE) of 577.3 ft in Primary Ponds 1 and 2 and 573.5 ft in the Secondary Settlement Pond sub-basin.

The Initial IDF concluded that the BAB met the requirements of §257.82, as the peak water surface estimated by the HydroCAD model was El. 577.8 ft in Primary Pond 1, 577.7 ft in Primary Pond 21, and 574.2 ft in the Secondary Settlement Pond, relative to a minimum crest elevations of 579.0 ft from Primary Ponds 1 and 2 and 578.0 ft for the Secondary Settlement Pond. Therefore, overtopping was not expected.

The Initial IDF also evaluated the potential for discharge from the CCR unit and determined that discharge in violation of the existing NDPS permit for the BAB was not expected, as all discharge from the BAB during both normal and inflow design flood conditions was expected to be routed through the existing spillway and discharge channel to a NDPS-permitted outfall associated with the DUC Cooling Pond.

3.2 Review of Initial IDF

Geosyntec performed a review of the Initial IDF ([2], [3]) in terms of technical approach, calculation input parameters and methodology, recommendations, and completeness. The review included the following tasks:

- Reviewing the return interval used vs. the CCR Rule [1] requirements.
- Reviewing the rainfall depth and distribution for appropriateness.
- Performing a high-level review of the inputs to the hydrologic modeling.

- Reviewing the hydrologic model parameters for spill parameters, starting pool elevation, and storage vs. the reference data.
- Reviewing the overall Initial IDF vs. the applicable requirements of the CCR Rule [1].

The review noted that the BAB is currently not receiving process flows and does not retain a normal pool, due to the DUC power plant being retired. The review also noted that the discharge of the BAB outfall into the DUC cooling discharge channel was considered a free-discharge in the initial IDF hydrologic model; however the discharge channel is not currently active (see **Section 3.3**). Therefore, the review determined that the assumptions within the IDF are conservative, and no significant technical issues were noted within the technical review. However, a detailed review (e.g., check) of the calculations was not performed.

3.3 Summary of Site Changes Affecting the Initial IDF

The DUC power plant was retired in December of 2019. Retirement includes the cessation of process water pumping into the BAB and cooling water into the cooling discharge channel, in addition to reduced water levels in Primary Ponds 1 and 2 and the Secondary Settlement Pond. Most of the impounded CCR was removed from the BAB at the time of closure. However, these changes result in the Initial IDF ([2], [3]) being conservative, as the existing pool elevations are below the starting water surface elevations (SWSEs) of 577.3 ft for Primary Ponds 1 and 2 and 573.5 ft for the Secondary Settlement Pond.

3.4 Updated IDF

Geosyntec does not recommend updating the Initial IDF ([2], [3]) at this time. Although several changes at the site have occurred, these changes are expected to reduce the peak water surface elevation (PWSE) during the IDF, rather than increase it. Therefore, the PWSE within the Initial IDF ([2], [3]) should be considered conservative.

SECTION 4

CONCLUSIONS

The BAB at DUC was evaluated relative to the USEPA CCR Rule periodic assessment requirements for Inflow design flood control system planning (§257.82). Based on these evaluations presented herein the referenced requirements are satisfied for inflow design flood control system planning.

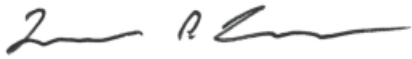
Duck Creek

SECTION 5

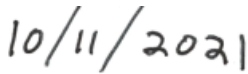
CERTIFICATION STATEMENT

CCR Unit: Illinois Power Resources Generation, LLC; Duck Creek Power Plant, BAB Pond

I, Lucas P. Carr, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this 2021 USEPA CCR Rule Periodic Certification Report, has been prepared in accordance with the accepted practice of engineering. I certify, for the above-referenced CCR Unit, that the periodic assessment of inflow design flood control system planning, dated October 2021, were conducted in accordance with the requirements of 40 CFR §257.82.



Lucas P. Carr



Date



Exp. 11/30/2021

SECTION 6

REFERENCES

- [1] United States Environmental Protection Agency, 40 CFR Parts 257 and 261; Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, 2015.
- [2] AECOM, "CCR Ruel Report: Initial Inflwo Design Flood Control System Plan for Bottom Ash Basin at Duck Creek Power Station," St. Louis, MO, October 2016.
- [3] AECOM, "CCR Certification Report: Initial Structural Stability Assessment, Initial Safety Factor Assessment, and Initial Inflow Design Flood Control System Plan for Bottom Ash Basin at Duck Creek Power Station," St. Louis, MO, October 2016.
- [4] J. Knutelski and J. Campbell, "Annual CCR Surface Impoundment Inspection Report (per 40 CFR 257.83(b)(2)), Duck Creek Power Station, Bottom Ash Basin," January 18, 2017.
- [5] J. Knutelski and J. Campbell, "Annual CCR Surface Impoundment Inspection Report (per 40 CFR 257.83(b)(2)), Duck Creek Power Station, Bottom Ash Basin," February 7, 2018.
- [6] J. Knutelski, "Annual Inspection by a Qualified Professional Engineer, 40 CFR §257.83(b), Duck Creek Power Station, Bottom Ash Basin," January 10, 2019.
- [7] J. Knutelski, "Annual Inspection by a Qualified Professional Engineer, 40 CFR §257.83(b), Duck Creek Power Station, Bottom Ash Basin," January 8, 2020.
- [8] J. Knutelski, "Annual Inspection by a Qualified Professional Engineer, 40 CFR §257.83(b), Duck Creek Power Station, Bottom Ash Basin," January 6, 2021.
- [9] AECOM, "CCR Unit Initial Site Visit Summary, Dynegy CCR Compliance Program, Duck Creek Bottom Ash Basin," June 23, 2015.

ATTACHMENTS

Attachment A
BAB Site Visit Photolog

GEOSYNTEC CONSULTANTS
Photographic Record



Site Owner: Illinois Power Resources Generating **Project Number:** GLP8027

CCR Unit: Bottom Ash Basin (BAB) **Site:** Duck Creek Power Station

Photo: 01

Date: 05/27/2021

Direction Facing:
E

Comments:
BAB north basin.
Note lack of CCR.



Photo: 02

Date: 05/27/2021

Direction Facing:
E

Comments:
BAB south basin.
Note lack of CCR.



GEOSYNTEC CONSULTANTS

Photographic Record



Site Owner: Illinois Power Resources Generating **Project Number:** GLP8027

CCR Unit: Bottom Ash Basin (BAB) **Site:** Duck Creek Power Station

Photo: 03

Date: 05/27/2021

Direction Facing:
E

Comments:
BAB polishing pond. Note lack of CCR.



Photo: 04

Date: 05/27/2021

Direction Facing:
E

Comments:
BAB polishing pond. Note lack of CCR.



GEOSYNTEC CONSULTANTS

Photographic Record



Site Owner: Illinois Power Resources Generating **Project Number:** GLP8027

CCR Unit: Bottom Ash Basin (BAB) **Site:** Duck Creek Power Station

Photo: 05

Date: 05/27/2021

Direction Facing:
Down

Comments:
BAB north basin
spillway inlet.



Photo: 06

Date: 05/27/2021

Direction Facing:
Down

Comments:
BAB south basin
spillway inlet.



GEOSYNTEC CONSULTANTS
Photographic Record



Site Owner: Illinois Power Resources Generating **Project Number:** GLP8027

CCR Unit: Bottom Ash Basin (BAB) **Site:** Duck Creek Power Station

Photo: 07

Date: 05/27/2021

Direction Facing:
Down

Comments:
BAB polishing
pond outfall inlet.

