



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

217-785-4787

September 11, 2014

Mr. Rick Diericx
Sr. Director – Environmental Compliance
Dynergy Operating Company
604 Pierce Boulevard
O'Fallon, IL 62269

Re: Dynergy Midwest Generation – Vermilion Power Station, North and Old East Ash Pond Sites

Dear Mr. Diericx,

In response to your submission of the Geotechnical Report for the North Ash Pond and Old East Ash Pond dated November 18, 2014 the Illinois Protection Agency recommends the following for your appropriate action.

There are several issues which will need to be addressed in order to move forward with closure plans for the North Ash Pond and the Old East Ash Pond. The closure options for the North Ash Pond and the Old East Ash Pond include but are not limited to: moving the ash back 100 to 200 feet from the river bank and completing closure with a cap; leaving the ash in the current location and completing closure with a cap; or removal of the ash and placing it in an onsite or offsite landfill. Removal would include the permitted discharge of water resulting from dewatering the impoundments. Alternatives for maintaining the river embankments may include but are not limited to cut off walls, sheet piling, gabion mattress, gabion walls, riprap, vegetated reinforced soil slope or other additional protection measures. The closure with the ash left in place option assumes the appropriate permits can be obtained from the US Army Corps of Engineers and the National Park Service to armor the river bank. We recommend the following additional study and analyses be conducted and provided to the Illinois EPA, Illinois DNR, Midwest Region National Park Service and the U.S. Army Corps of Engineers for comment and revision as needed:

1. Determine the access requirements (distance between the toe of the impoundment and the river bank needed for equipment staging and construction) necessary to protect the river bank along the North Ash Pond and the Old East Ash Pond;
2. Evaluate current river bank location and potential river bank erosion relative to the access requirements determined above at the North Ash Pond and the Old East Ash Pond;
3. Develop a contingency plan for interim stabilization of the stream bank segments consistent with the river's designation as a scenic river;

4. Conduct a full review (more than a cursory review) of the long term river bank stabilization options (e.g. cut off walls, sheet piling, gabion mattress, vegetated reinforced soil slope) and how the various options can be undertaken consistent with the river's designation as a scenic river;
5. Identify and rank the potential long term river bank stabilization options to determine which options are best suited for the North Ash Pond, and the Old East Ash Pond consistent with the river's designation as a scenic river;
6. Determine which long term river bank stabilization options the National Park Service would consider for the ash impoundments;
7. Complete steady state groundwater flow/contaminant transport modeling to predict the future concentration of contaminants for each closure option;
8. Complete cost analysis for each closure option including the river bank stabilization required ; and
9. Complete a comparison of all closure options.

We request that above information be provided to the Agency within 6 months of the date of this letter. If you have any additional questions regarding this correspondence, please contact Bill Buscher at 217-785-4787.

Thank you for the opportunity to review and comment on the geotechnical report.
Sincerely,

A handwritten signature in black ink, appearing to read "Richard P. Cobb". The signature is fluid and cursive, with a horizontal line extending from the end.

Richard P. Cobb, P.G.
Deputy Manager
Division of Public Water Supplies

cc: Champaign Region
Records
Buscher
Zimmer
Todd Retigg IL DNR