

**City Water, Light and Power
Coal Combustion Residuals Surface Impoundments**

**Progress Report for Alternative Closure
Requirements in Accordance with 40 CFR 257.103(f)(1)**

April 2023



City Water, Light and Power (CWLP) owns and operates two existing coal combustion residual (CCR) surface impoundments, operating as a single multi-unit system for purposes of groundwater monitoring and closure. These CCR surface impoundments are identified as the Lakeside Ash Pond and the Dallman Ash Pond and are located northeast of the power plant complex in Springfield, Illinois. The ponds are operated under National Pollutant Discharge Elimination System (NPDES) Permit Number IL0024767. All material going to these ponds are wet-generated, not dry.

The Lakeside Ash Pond was placed in service prior to 1958 and ceased receiving ash in 2009. It has been divided into four separate ponds, three limesludge ponds and the settling pond consisting of approximately 35.0 acres. The Lakeside Ash Pond currently receives limesludge from the CWLP Drinking Water Purification Plant, scrubber wastewater treatment plant clarifier blowdown, industrial wastewater treatment plant clarifier blowdown and water from miscellaneous floor drains. The Dallman Ash Pond was placed into service in 1976 and is approximately 34.5 acres. The Dallman Ash Pond has ceased receiving all wastewaters. Settled water from both the Lakeside Ash Pond and Dallman Ash Pond flow into opposite sides of a Clarification Pond for final polishing before being discharged to Sugar Creek at Outfall 004.

In April 2019, CWLP submitted our notification of intent to comply with the Alternative Closure Requirements 257.103(a) since no alternative disposal capacity is currently available. Since then, CWLP has shut down Dallman Units 31, 32 and 33, and all fly and bottom ash has ceased being sent to the Dallman Ash pond. Additionally, CWLP will commence with the permanent closure of the Dallman and Lakeside ash impoundments once the Dallman Units 31, 32 and 33 are officially shutdown and the CWLP water purification plant limesludge ponds are relocated. Concerning the limesludge ponds, CWLP has begun the project and the limesludge ponds will be complete no later than fall of 2023.

Additionally in November of 2020, CWLP submitted our request to USEPA for approval for a site-specific alternative deadline to initiate closure pursuant to 40 CFR § 257.103(f)(1). CWLP requested an extension to allow the two impoundments to continue to receive CCR and non-CCR waste streams after April 11, 2021, in order to complete the retirements of Dallman Units 31, 32 and 33 and relocate the CWLP drinking water purification plant lime sludge ponds, which are currently located on the Lakeside Ash Pond. USEPA has proposed to find this submittal "Incomplete" on January 11, 2022. On March 25, 2022, CWLP submitted comments concerning the proposed date to cease receipt of waste for Dallman Power Station based on Interim Determination of Incompleteness of Demonstration. CWLP is waiting for USEPA to respond to our comments and finalize its determination on the request.

CWLP had been submitting annual progress reports each May under 40 C.F.R. 257.103(c). Following the May 2020 CCR rule update, that provision was changed to apply only to landfills. For CCR surface impoundments closing under the Alternative Closure Provisions, the progress report requirement was changed to semi-annual. However, the dates for semi-annual reporting did not take effect until the Administrator made a determination under 40 C.F.R. 257.103(f)(1) or (2). This created a loophole in the regulation where CWLP is technically not required to make either the annual or semi-annual progress reports. However, CWLP feels it is appropriate to post a progress report at least annually until the alternative capacity projects are completed.