

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
PETITION OF AMEREN ENERGY) PCB AS 2021-008
) (Adjusted Standard – Land)
MEDIAN VALLEY COGEN LLC (OLD)
)
MEREDOSIA) FOR AN ADJUSTED)
)
STANDARD FROM 35 ADMIN. CODE)
)
PART 845)

NOTICE OF FILING

To: See attached Service List

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Pollution Control Board Ameren Energy Median Valley Cogen LLC's Motion to Extend Discovery, a copy of which is herewith served upon you.

Dated: December 19, 2024

AMEREN ENERGY MEDINA VALLEY
COGEN, LLC

By: /s/Kristen L. Gale

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true copy of the foregoing Notice of Filing and Ameren Energy Median Valley Cogen LLC's Motion to Extend Discovery was electronically filed on December 19, 2024 with the following:

Don Brown, Clerk of the Board
Illinois Pollution Control Board
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and that copies were sent via e-mail on December 19, 2024 to the parties on the service list.

Dated: December 19, 2024

/s/Kristen L. Gale

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
PETITION OF AMEREN EMERGY MEDIAN) PCB AS 2021-008
VALLEY COGEN LLC (OLD MEREDOSIA)) (Adjusted Standard – Land)
FOR AN ADJUSTED STANDARD FROM 35)
ADMIN. CODE PART 845)

**AMEREN ENERGY MEDIAN VALLEY COGEN LLC'S MOTION
TO EXTEND DISCOVERY**

Ameren Energy Medina Valley Cogen, LLC (“Ameren”), pursuant to 35 Ill. Adm. Code 101.522, requests that the Hearing Officer enter an order extending the discovery deadline to 90 days after the end of the stay or 90 days after the Board’s decision on the stay, whichever is later. In support thereof, Ameren states as follows:

1. On August 14, 2024, Ameren’s Motion to Extend Discovery Period was filed, and on August 26, 2024, the Hearing Officer granted the unopposed motion, extending the discovery period to October 20, 2024.
2. On October 18, 2024, Ameren filed an agreed motion to extend the discovery period for 90 days, which the Hearing Officer granted on October 21, 2024.
3. There is good cause to extend discovery. Concurrent with this Motion, Ameren is filing a Motion to Stay the proceeding for 180-days to conduct an evaluation of an alternative to a Part 845 closure. While Ameren recognizes that the Old Meredosia Pond is a CCR surface impoundment, because it was closed over 50 years ago, its surface has an established ecosystem that supports sensitive species, including a Bald Eagle’s nest. The purpose of the evaluation is to conduct a treatability study to evaluate alternative methods to treat the groundwater and also avoid destroying the ecosystem on the surface. In the interim, Ameren will begin the process of preparing an operating permit application for the Old Meredosia Pond.

4. Ameren seeks an extension of the discovery period to 90 days after the end of the stay or 90 days after the Board's decision on the stay, whichever is later, to give the parties time to review the results of the treatability study, and conduct any additional written and oral discovery, if needed.

5. Ameren has reached out to the Illinois Environmental Protection Agency ("Agency") on its request for an extension, but as of this filing Ameren has not received a response from the Agency.

WHEREFORE, Ameren Energy Medina Valley Cogen, LLC requests that the Hearing Officer grant its Motion to Extend Discovery to 90 days after the end of the stay or 90 days after the Board's decision on the stay, whichever is later.

Respectfully submitted,

AMEREN ENERGY MEDINA VALLEY
COGEN, LLC

Petitioner,

By: /s/ Kristen L. Gale
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