

Dallman and Lakeside Ash Ponds
Post-Closure Plan
City Water, Light and Power
Springfield, Sangamon County, Illinois

September 23, 2025

Table of Contents

1. Responses to Attachment 3 Items.....	1
1.1 Post-Closure Plan	1
1.1.1 Include the wells identified as part of the Surface Impoundment GWMS from the CAFO.....	1
1.1.2 The post-closure monitoring necessary to meet the federal groundwater monitoring requirements and the CAFO.....	1
1.1.3 Extending the assessment and corrective measures monitoring period until such time as the GWPS are met or work towards meeting GWPS.....	1
1.1.4 Restrictions or institutional controls necessary to maintain the final cover and use of the property (i.e., open space) and the integrity of the ground water monitoring system.	1
1.1.5 The post-closure maintenance of the leachate management system, including information on the components of the cover system that need to be inspected or maintained.....	1
2. Introduction.....	2
2.1 Regulatory Requirements.....	2
3. Site Background	2
3.1 Lakeside Ash Ponds	2
3.2 Dallman Ash Ponds	2
3.3 Clarification Pond.....	4
4. Post-Closure Maintenance	4
4.1 Introduction	4
4.2 Final Cover Maintenance.....	4
4.3 Leachate Collection System Maintenance	4
4.4 Groundwater Monitoring System Maintenance.....	5
5. Post-Closure Care Period	5
6. Written Post-Closure Plan.....	5
6.1 Monitoring and Maintenance Activities	5
6.2 Contact Information	7
6.3 Planned Property Use	7
7. Professional Engineer Certification	8
8. References	8

Figures and Tables

Figures

Figure 1. Site Location Map.....	3
Figure 2. Monitoring Well Location Map.....	6

Tables

Table 1. Post-Closure Maintenance Activities and Frequency.....	5
---	---

Abbreviations

CAFO.....	Consent Agreement and Final Order
CCR.....	coal combustion residuals
CFR.....	Code of Federal Regulations
cu. ft.	cubic feet
CWLP.....	City Water, Light and Power
ft.....	feet
GWMS	groundwater monitoring system
GWPS.....	groundwater protection standard
IDOT	Illinois Department of Transportation
IEPA.....	Illinois Environmental Protection Agency
NPDES	National Pollutant Discharge Elimination System
sq. ft.	square feet
U.S. EPA.....	United States Environmental Protection Agency

Copyright ©2025 by Hanson Professional Services Inc. All rights reserved. This document is intended solely for the individual or the entity to which it is addressed. The information contained in this document shall not be duplicated, stored electronically, or distributed, in whole or in part, by anyone other than the recipient without the express written permission of Hanson Professional Services Inc., 1525 S. Sixth St., Springfield, IL 62703, (217) 788-2450, www.hanson-inc.com. Unauthorized reproduction or transmission of any part of this document is a violation of federal law. Any concepts, designs and project approaches contained herein are considered proprietary. Any use of these concepts and approaches by others is considered a violation of copyright law.

1. Responses to Attachment 3 Items

1.1 Post-Closure Plan

1.1.1 Include the wells identified as part of the Surface Impoundment GWMS from the CAFO.

See Section 4.4 for the monitoring well information and Figure 2 for a location map.

1.1.2 The post-closure monitoring necessary to meet the federal groundwater monitoring requirements and the CAFO.

CWLP believes that the impoundments will still be in assessment monitoring pursuant to 40 CFR §257.95 and will remain in assessment monitoring until groundwater meets the GWPS.

1.1.3 Extending the assessment and corrective measures monitoring period until such time as the GWPS are met or work towards meeting GWPS.

In accordance with 40 CFR §257.95 the Site cannot return to detection monitoring until the GWPS are met. The assessment of corrective measures report is being reviewed by U.S. EPA currently and the closure and post-closure plans are due to U.S. EPA on September 23, 2025.

1.1.4 Restrictions or institutional controls necessary to maintain the final cover and use of the property (i.e., open space) and the integrity of the ground water monitoring system.

See Section 4.4 Groundwater Monitoring System Maintenance for a discussion of access control and the groundwater monitoring system.

A deed restriction will be placed on the property noting the property was used for CCR disposal per 40 CFR 257.102(i).

1.1.5 The post-closure maintenance of the leachate management system, including information on the components of the cover system that need to be inspected or maintained.

The reference to the design criteria of 40 CFR §257.70 listed in §257.104(b)(2) is specifically for CCR landfills. The CWLP impoundments are exempt from this requirement.

2. Introduction

2.1 Regulatory Requirements

This document amends the CWLP's 2016 Post-Closure Plan (AEI, 2016b) to meet the requirements of 40 CFR 257.104 and the January 2025 Consent Agreement and Final Order.

§ 257.104

- *Applicability.* (1) Except as provided by paragraph (a)(2) of this section, § 257.104 applies to the owners or operators of CCR landfills, CCR surface impoundments, and all lateral expansions of CCR units that are subject to the closure criteria under § 257.102.

CAFO Count 9

- The 2016 Post-Closure Plan does not have sufficient information to demonstrate that it meets the requirements of 40 C.F.R. §§ 257.104(b)(1) and (3), (d)(1), and (2)(i) and, therefore, is in violation of these regulations.

CAFO Attachment 3

- Additional requirements to be considered in the Post-Closure Plan.

3. Site Background

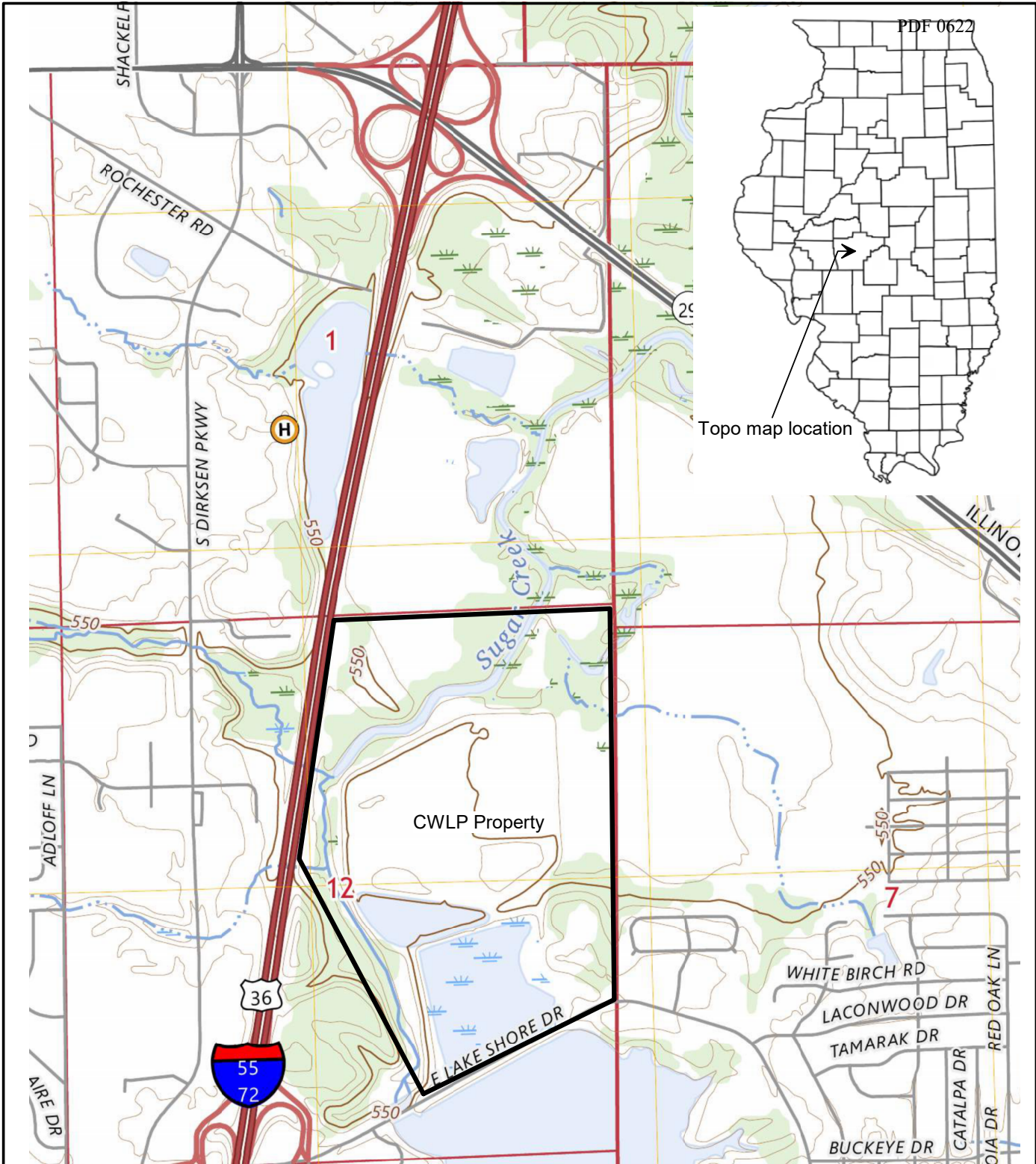
The CWLP ash ponds are in Section 12 R.5W, T.15N of the Third Principal Meridian in Springfield, Sangamon County, Illinois. The Site is in the Springfield Plain of the Central Lowland Province Physiographic Division of Illinois (Leighton et al., 1948).

3.1 Lakeside Ash Ponds

The older of the two (2) impoundments is Lakeside Ash Pond (LAP). LAP has a footprint of approximately 36 acres and contains approximately 1,565,000 cubic yards (cu. yd.) of CCR along with water treatment plant sludge. The current footprint is the maximum area that would require final cover if LAP was closed-in-place. The floor of LAP is approximately elevation 530 ft. and slopes upward in the southeast corner following the natural topography.

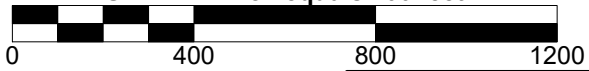
3.2 Dallman Ash Ponds

Dallman Ash Pond (DAP) has a footprint of approximately 36 acres and currently contains approximately 1,217,000 cu. yd. of CCR. In the past, there were two (2) IDOT construction projects that used approximately 875,000 cu. yd. of DAP CCR for a maximum volume of CCR of almost 2,100,000 cu. yd. The current footprint is the maximum area that would require final cover if DAP was closed-in-place. The floor of DAP slopes from the south to the northeast corner (from elevation 525 ft. to about 523 ft. Note that the bottom of DAP at boring D4 is over elevation 530 ft.

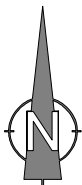


SCALE: 1 inch equals 400 feet

CONTOUR INTERVAL = 10 feet



© Copyright Hanson Professional Services Inc. 2025



Site Location Map

Dallman and Lakeside Ash Ponds
 City Water, Light and Power
 Springfield, Sangamon Co., Illinois

HANSON NO. 25E0006.00

FIGURE 1

3.3 Clarification Pond

The Clarification Pond footprint is approximately 7.8 acres and is a non-CCR unit. The Clarification Pond collects storm water runoff from DAP and LAP for treatment and discharge at NPDES Outfall 004. Unit 2 Landfill leachate and process water from the Lime Lagoons is also discharged to the Clarification Pond for treatment and discharge at Outfall 004. A modification of the CWLP NPDES permit is currently pending at IEPA Bureau of Water to allow treatment and discharge of pore water in contact with CCR (dewatering fluids).

4. Post-Closure Maintenance

4.1 Introduction

CWLP intends to consolidate LAP into DAP. CWLP intends to cover the consolidated LAP and DAP using WatershedGeo's® ClosureTurf® a three-component system comprised of an engineered synthetic turf for durability and functional longevity, a specified infill material for enhanced protection, and a structured geomembrane for environmental containment.

4.2 Final Cover Maintenance

Maintenance of ClosureTurf® requires considerably less effort than traditional soil cover systems. The manufacturer's literature notes that maintenance costs can be as much as 90% lower than maintenance of traditional soil cover systems. It is also expected to have a design life of more than 100 years.

The final cover system will be inspected quarterly, and any defects will be noted. Any issues with the synthetic turf will be watched for signs of additional wear/damage. At that point repairs will be scheduled to prevent further damage.

Signs of settlement will also be noted and a determination that the cover is holding water will be made. If water is determined to be ponding on the final cover, then mitigation of the settlement will be completed.

Run-on and run-off of storm water is controlled by the ClosureTurf® and perimeter ditches. Run-on is controlled by an outward slope on the perimeter roads. Run-off is controlled by the MicroDrain® geomembrane, which has small studs on the upper surface, which acts similarly to a geocomposite drainage layer. Stormwater is transferred downslope to the perimeter ditches where it is directed to drainage outfalls for discharge to Sugar Creek or the Clarification Pond.

4.3 Leachate Collection System Maintenance

DAP and LAP are not subject to 40 CFR §257.70. However, the dewatering system wells will be inspected at least quarterly or if a dewatering well is not working. Pump operating equipment (controllers, cycle counter, etc.) will be inspected and pump discharges will be noted. Pumps will be replaced as necessary.

4.4 Groundwater Monitoring System Maintenance

The groundwater monitoring system consists of the following monitoring wells AP-1, AP-2, AP-3, AP-4[†], AP-5[‡], AP-6, AP-7[‡], AP-8, AP-10, AP-14, AP-15D, AP-15S, AW-1, RW-3, and G120. Figure 2 shows the locations of the monitoring wells relative to the impoundments.

All the groundwater monitoring wells are constructed with lockable, protective, steel casings to restrict access to the well itself. The post-closure access to the Site is controlled by fencing (concrete wall on the south side, Interstate 55/72 fencing on the west side, and fencing along the farm field on the east side of the Unit 2 Landfill). Access from the north is controlled by Sugar Creek. The Site entrance is gated and CWLP Security frequently checks the area on a regular basis.

Wells are inspected each time they are sampled, and any defects are noted. Any defects that affect the integrity of the monitoring well or that affect the water quality will require the monitoring well to be replaced.

5. Post-Closure Care Period

Pursuant to 40 CFR §257.104(c) the post-closure care period must be conducted for 30 years unless the CCR Unit is operating under assessment monitoring in accordance with §257.95. Post closure care must continue until the monitoring system returns to detection monitoring in accordance with §257.95.

6. Written Post-Closure Plan

6.1 Monitoring and Maintenance Activities

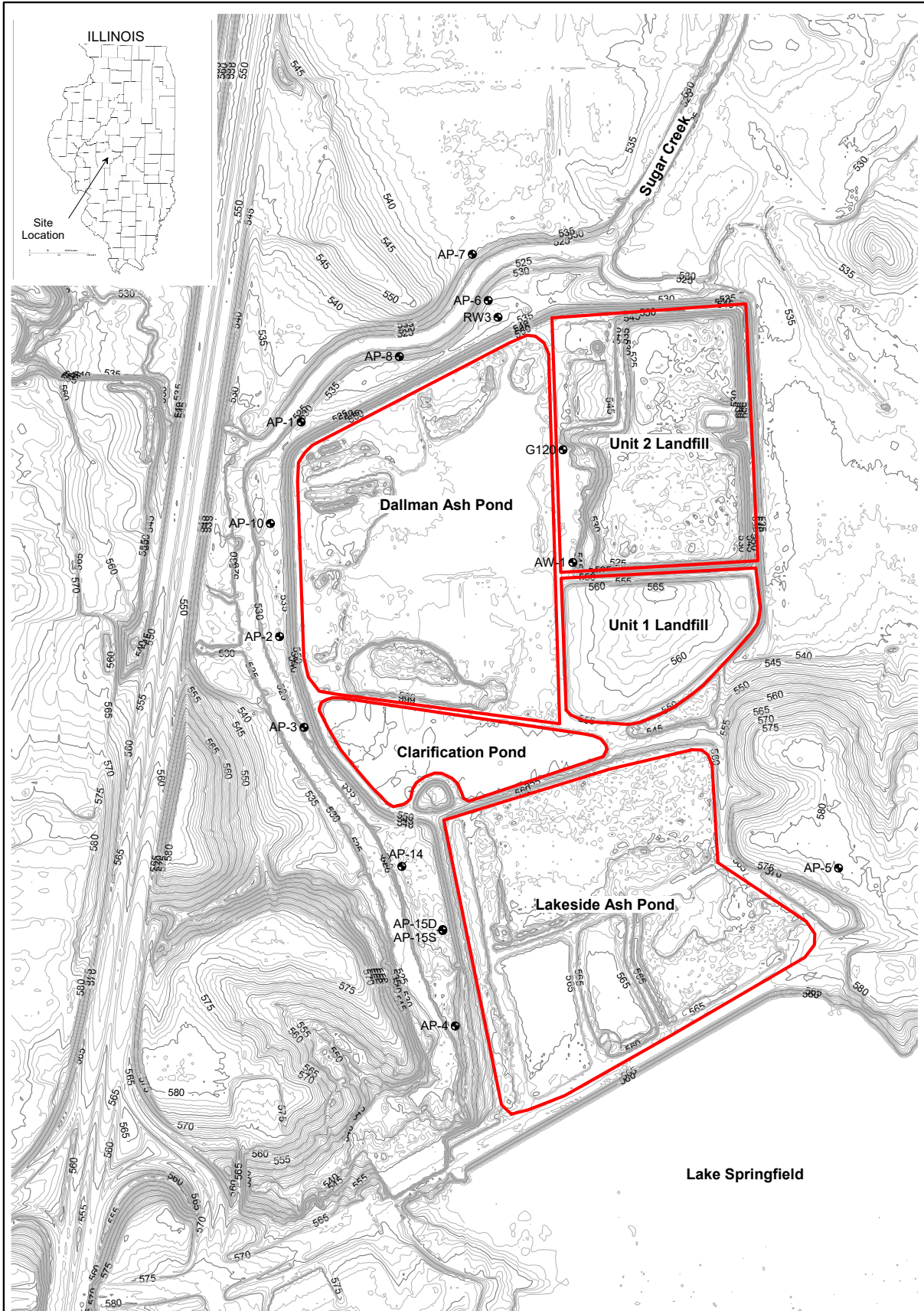
Table 1 lists the monitoring and maintenance activities required during the post-closure period.

Table 1. Post-Closure Maintenance Activities and Frequency

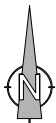
Activity	Frequency
Mowing berms	2x per year
Final cover inspections	quarterly
Berm inspections	quarterly
Drainage structures	quarterly
Dewatering wells	quarterly or when not functioning properly
Groundwater monitoring wells	each sampling event

[†] Upgradient well.

[‡] Compliance boundary well.



© Copyright Hanson Professional Services Inc. 2025



SCALE: 1 inch equals 400 feet

0 ft. 400 ft. 800 ft. 1,200 ft.



Monitoring Well Location Map

Dallman and Lakeside Ash Ponds
City Water, Light and Power
Springfield, Sangamon Co., Illinois

HANSON NO. 25E0006.00

FIGURE NO. 2

Other earthwork and maintenance include:

1. Rills, gullies, and crevices identified in the ash pond berm shall be filled.
2. Areas with missing vegetation (100 sq. ft. or more) will be revegetated.
3. Brush, trees, or vegetation with tap roots shall be removed.
4. Drainage channels with signs of erosion/scour will be repaired.
5. Any damage to the synthetic turf shall be repaired.

6.2 Contact Information

The name, address, telephone number, and email address of the person or office to contact about the facility during the post-closure care period is:

P.J. Becker
Environmental Health & Safety Manager
City Water Light and Power
3100 Stevenson Drive
Springfield Illinois 62703
(217) 757-8610 ext. 1110
pj.becker@cwlp.com

6.3 Planned Property Use

The post-closure property use for the CCR impoundments will be:

Lakeside Ash Pond – after consolidation with the Dallman Ash Pond, Lakeside will be returned to a natural area with native vegetation. The area will also be used for storage of water released from Lake Springfield.

Dallman Ash Pond – once Lakeside Ash Pond is consolidated into Dallman Ash Pond and the ClosureTurf® final cover system is installed the end use will be open space that will not disturb the final cover system, dewatering system, or other monitoring equipment.

7. Professional Engineer Certification

This amendment to the CWLP Post-Closure Plan meets the requirements of 40 CFR §257.104.



 John M. Heyen

September 23, 2025

Date

SEAL



Expires November 30, 2027

8. References

AEI, 2016b. "Post-Closure Plan for Coal Combustion Residuals Surface Impoundments", October 2016, Andrews Engineering, Inc., Springfield, IL. 4 pp. + 1 app.

Leighton, M.M., G.E. Ekblaw, and L. Horberg, 1948. "Physiographic Divisions of Illinois, Report of Investigations No. 129," Illinois State Geological Survey, Urbana, IL. 33 pp.

USGS, 1965. *Springfield East, Ill, USGS 7½-minute Series*, United States Geological Survey, US Department of Interior, Reston, VA, 1965.