



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

BRUCE RAUNER, GOVERNOR

LISA BONNETT, DIRECTOR

(217) 782-9817
TDD: (217) 782-9143

January 29, 2015



ORIGINAL

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CLERK'S OFFICE

FEB 04 2015

STATE OF ILLINOIS
Pollution Control Board

AC15-28

John Therriault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

Re: Illinois Environmental Protection Agency v Illinois Power Resources Generating, LLC
and Robert Klahs
IEPA File No. 37-15-AC; 0570255197

Dear Mr. Therriault:

Enclosed for filing with the Illinois Pollution Control Board, please find the original and nine true and correct copies of the Administrative Citation Package, consisting of the Administrative Citation, the inspector's Affidavit, and the inspector's Illinois Environmental Protection Agency 811 Solid Waste Landfill Inspection Checklist, issued to the above-referenced respondent(s).

On this date, a copy of the Administrative Citation Package was sent to the Respondent(s) via Certified Mail. As soon as I receive the return receipt, I will promptly file a copy with you, so that the Illinois Pollution Control Board may calculate the thirty-five (35) day appeal period for purposes of entering a default judgment in the event the Respondent(s) fails or elects not to file a petition for review contesting the Administrative Citation.

If you have any questions or concerns, please do not hesitate to contact me at the number above. Thank you for your cooperation.

Sincerely,

Michelle M. Ryan
Assistant Counsel

Enclosures

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ADMINISTRATIVE CITATION

ILLINOIS ENVIRONMENTAL)
 PROTECTION AGENCY,)
)
 Complainant,)
)
 v.)
)
 ILLINOIS POWER RESOURCES)
 GENERATING, LLC and ROBERT KLAHS,)
)
 Respondents.)

AC 15-28
 (IEPA No. 37-15-AC)

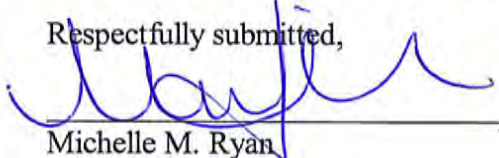
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 STATE OF ILLINOIS
 Pollution Control Board

NOTICE OF FILING

To: Illinois Power Resources Generating, LLC
 c/o Capitol Corporate Services Inc.
 1315 W. Lawrence Avenue
 Springfield, Illinois 62704

Robert Klahs
 760 Wickeleigh Terrace
 Fenton, Missouri 63028

PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and 811 SOLID WASTE LANDFILL INSPECTION CHECKLIST.

Respectfully submitted,


 Michelle M. Ryan
 Assistant Counsel

Illinois Environmental Protection Agency
 1021 North Grand Avenue East
 P.O. Box 19276
 Springfield, Illinois 62794-9276
 (217) 782-5544

Dated: January 29, 2015

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
ADMINISTRATIVE CITATION

ILLINOIS ENVIRONMENTAL PROTECTION)
AGENCY,)
Complainant,)
v.)
ILLINOIS POWER RESOURCES)
GENERATING, LLC and ROBERT KLAHS,)
Respondents.)

AC 15-28
(IEPA No.37-15-AC)

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STATE OF ILLINOIS
Pollution Control Board

JURISDICTION

This Administrative Citation is issued pursuant to the authority vested in the Illinois Environmental Protection Agency by Section 31.1 of the Illinois Environmental Protection Act, 415 ILCS 5/31.1 (2014).

FACTS

1. That Illinois Power Resources Generating, LLC is the permitted owner and Robert Klahs is the Chief Operator, ("Respondents") of a facility located at 17751 North Cilco Road, Canton, Fulton County, Illinois.
2. That said facility is a sanitary landfill, operating under Illinois Environmental Protection Agency Permit No. 2005-121-LF. The facility is designated with Site Code No. 0570255197 and commonly known to the Illinois Environmental Protection Agency as Duck Creek Station Ash LF.
3. That Respondents have owned/operated said facility at all times pertinent hereto.
4. That on December 17, 2014, Robert J. Wagner of the Illinois Environmental Protection Agency's Peoria Regional Office inspected the above-referenced facility. A copy of his

inspection report setting forth the results of said inspection is attached hereto and made a part hereof.

5. That on 1-29-15, the Illinois EPA sent this Administrative Citation via Certified Mail No. 7012 0470 0001 3000 5806 - IL Power
7012 0470 0001 3000 5790 - Klahs
VIOLATIONS

Based upon direct observations made by Robert J. Wagner during the course of his December 17, 2014 inspection of the above-named facility, the Illinois Environmental Protection Agency has determined that Respondents have violated the Illinois Environmental Protection Act (hereinafter, the "Act") as follows:

- (1) That Respondents conducted a sanitary landfill in a manner which resulted in acceptance of wastes without necessary permits, a violation of Section 21(0)(7) of the Act, 415 ILCS 5/21 (0)(7) (2014).
- (2) That Respondents conducted a sanitary landfill in a manner which resulted in deposition of refuse in an unpermitted portion of the landfill, a violation of Section 21(0)(9) of the Act, 415 ILCS 5/21 (0)(9) (2014).

CIVIL PENALTY

Pursuit to Section 42(b)(4-5) of the Act, 415 ILCS 5/42(b)(4-5) (2014), Respondents are subject to a civil penalty of Five Hundred Dollars (\$500.00) for each violation, for a total of One Thousand Dollars (\$1000.00). If Respondents elect not to petition the Illinois Pollution Control Board, the statutory civil penalty specified above shall be due and payable no later than March 6, 2015, unless otherwise provided by order of the Illinois Pollution Control Board.

If Respondents elect to contest this Administrative Citation by petitioning the Illinois Pollution

Control Board in accordance with Section 31.1 of the Act, 415 ILCS 5/31.1 (2014), and if the Illinois Pollution Control Board issues a finding of violation as alleged herein, after an adjudicatory hearing, Respondents shall be assessed the associated hearing costs incurred by the Illinois Environmental Protection Agency and the Illinois Pollution Control Board. Those hearing costs shall be assessed in addition to the Five Hundred Dollar (\$500.00) statutory civil penalty for each violation.

Pursuant to Section 31.1(d)(1) of the Act, 415 ILCS 5/31.1(d)(1) (2014), if Respondents fail to petition or elect not to petition the Illinois Pollution Control Board for review of this Administrative Citation within thirty-five (35) days of the date of service, the Illinois Pollution Control Board shall adopt a final order, which shall include this Administrative Citation and findings of violation as alleged herein, and shall impose the statutory civil penalty specified above.

When payment is made, Respondent's check shall be made payable to the Illinois Environmental Protection Trust Fund and mailed to the attention of Fiscal Services, Illinois Environmental Protection Agency, 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Along with payment, Respondents shall complete and return the enclosed Remittance Form to ensure proper documentation of payment.

If any civil penalty and/or hearing costs are not paid within the time prescribed by order of the Illinois Pollution Control Board, interest on said penalty and/or hearing costs shall be assessed against the Respondents from the date payment is due up to and including the date that payment is received. The Office of the Illinois Attorney General may be requested to initiate proceedings against Respondents in Circuit Court to collect said penalty and/or hearing costs, plus any interest accrued.

PROCEDURE FOR CONTESTING THIS
ADMINISTRATIVE CITATION

Respondents have the right to contest this Administrative Citation pursuant to and in accordance with Section 31.1 of the Act, 415 ILCS 5/31/1 (2014). If Respondents elect to contest this Administrative Citation, then Respondents shall file a signed Petition for Review, including a Notice of Filing, Certificate of Service, and Notice of Appearance, with the Clerk of the Illinois Pollution Control Board, State of Illinois Center, 100 West Randolph, Suite 11-500, Chicago, Illinois 60601. A copy of said Petition for Review shall be filed with the Illinois Environmental Protection Agency's Division of Legal Counsel at 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Section 31.1 of the Act provides that any Petition for Review shall be filed within thirty-five (35) days of the date of service of this Administrative Citation or the Illinois Pollution Control Board shall enter a default judgment against the Respondents.

Lisa Bonnett ^{AMP}

Date:

1-28-15

Lisa Bonnett, Director
Illinois Environmental Protection Agency

Prepared by: Susan E. Konzelmann, Legal Assistant
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

REMITTANCE FORM

ILLINOIS ENVIRONMENTAL PROTECTION)
AGENCY,)
Complainant,)
v.)
ILLINOIS POWER RESOURCES)
GENERATING, LLC and ROBERT KLAHS,)
Respondents.)

AC 15-28
(IEPA No. 37-15-AC)

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STATE OF ILLINOIS
Department of Natural Resources

FACILITY: Duck Creek Station Ash LF
SITE CODE NO.: 0570255197
COUNTY: Fulton
CIVIL PENALTY: \$1000.00
DATE OF INSPECTION: December 17, 2014

DATE REMITTED:

SS/FEIN NUMBER:

SIGNATURE:

NOTE

Please enter the date of your remittance, your Social Security number (SS) if an individual or Federal Employer Identification Number (FEIN) is a corporation, and sign this Remittance Form. Be sure your check is enclosed and mail, along with Remittance Form, to Illinois Environmental Protection Agency, Attn.: Fiscal Services, P.O. Box 19276, Springfield, Illinois 62794-9276.

STATE OF ILLINOIS)
) SS
COUNTY OF Fulton)

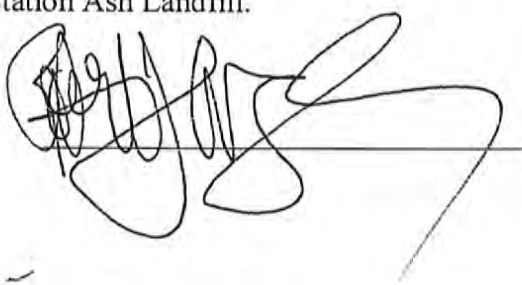
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STATE OF ILLINOIS
Notaries Council Board

AFFIDAVIT

I, Robert J. Wagner, being first duly sworn upon oath, depose and state as follows:

1. Affiant is a field inspector employed by the Land Pollution Control Division of the Illinois Environmental Protection Agency and has been so employed at all times pertinent hereto.
2. On December 17, 2014, between 8:38 AM and 11:07 AM, Affiant conducted an inspection of the Landfill in Fulton County, Illinois, known as Duck Creek Station Ash Landfill, Illinois Environmental Protection Agency Site No. 0570255197, operating under IEPA Permit #2005-121-LF, Modification No.4.
3. Affiant inspected said landfill site by an on-site inspection, which included walking the site and interviewing personnel.
4. Before and/or after said inspection of said landfill site, Affiant reviewed Illinois Environmental Protection Agency permits issued to the subject site and investigated into whether or not required documents were timely filed on behalf of the subject site.
5. As a result of the activities referred to in Paragraphs 3 and 4 above, Affiant completed the Inspection Report form attached hereto and made a part hereof, which, to the best of Affiant's knowledge and belief, is an accurate representation of Affiant's observations and factual conclusions with respect to Duck Creek Station Ash Landfill.

FURTHER AFFIANT SAYETH NOT.



Subscribed and Sworn to before

me this 14 day of January 2015


Notary Public



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

811 Solid Waste Landfill Inspection Checklist

County: Fulton LPC#: 0570255197 Region: 3 - Peoria
 Location/Site Name: Canton / Duck Creek Station Ash LF
 Date: 12/17/2014 Time: From 8:38 AM To 11:07 AM Previous Inspection Date: 10/08/2014
 Inspector(s): Robert J. Wagner Weather: 35 F, Overcast, Dry, Ground Frozen
 No. of Photos Taken: # 27 Samples Taken: Yes # No
 Interviewed: Robert Klahs and Darryl Johnson Facility Phone No.: (309) 669-3883

Permitted Owner Mailing Address

Illinois Power Resources Generating, LLC
 604 Pierce Blvd.
 O'Fallon, Illinois 62269-2579

Permitted Operator Mailing Address

Illinois Power Resources Generating, LLC
 604 Pierce Blvd.
 O'Fallon, Illinois 62269-2579

Chief Operator Mailing Address

Robert Klahs
 17751 North Cilco Road
 Canton, IL 61520

Certified Operator Mailing Address

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 STATE OF ILLINOIS
 DEPARTMENT OF ENVIRONMENT

AUTHORIZATION:

Significant Modification Permit
 Initial: 2005-121-LF
 Latest Mod. 5 Log#2013-228
 Exp Date 08/28/2018

OPERATIONAL STATUS:

Operating
 Closed-Not Certified.
 Closed-Date Certified:

TYPE OF OPERATION:

Existing Landfills 814-Subpart C
 814-Subpart D
 New Landfills: 811-Putres./Chem.

	SECTION	DESCRIPTION	VIOL
ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS			
1.	9(a)	CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS	<input type="checkbox"/>
2.	9(c)	CAUSE OR ALLOW OPEN BURNING	<input type="checkbox"/>
3.	12(a)	CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS	<input type="checkbox"/>
4.	12(d)	CREATE A WATER POLLUTION HAZARD	<input type="checkbox"/>
5.	12(f)	CAUSE, THREATEN OR ALLOW DISCHARGE WITHOUT OR IN VIOLATION OF AN NPDES PERMIT	<input type="checkbox"/>
6.	21(a)	CAUSE OR ALLOW OPEN DUMPING	<input type="checkbox"/>
7.	21(d)	CONDUCT ANY WASTE-STORAGE, WASTE-TREATMENT, OR WASTE- DISPOSAL OPERATION:	
	(1)	Without a Permit or in Violation of Any Conditions of a Permit (See Permit Provisions)	<input checked="" type="checkbox"/>
	(2)	In Violation of Any Regulations or Standards Adopted by the Board	<input checked="" type="checkbox"/>
8.	21(e)	DISPOSE, TREAT, STORE, OR ABANDON ANY WASTE, OR TRANSPORT ANY WASTE INTO THE STATE AT/TO SITES NOT MEETING REQUIREMENTS OF ACT AND REGULATIONS	<input checked="" type="checkbox"/>
9.	21(f)(1)	CONDUCT ANY HAZARDOUS WASTE-STORAGE, TREATMENT OR DISPOSAL OPERATION WITHOUT A RCRA PERMIT.	<input type="checkbox"/>

LPC #: 0570255197
 Inspection Date: 12/17/2014

10.	21(o)	CONDUCT A SANITARY LANDFILL OPERATION WHICH RESULTS IN ANY OF THE FOLLOWING CONDITIONS:	
	(1)	Refuse in Standing or Flowing Water	<input type="checkbox"/>
	(2)	Leachate Flows Entering Waters of the State	<input type="checkbox"/>
	(3)	Leachate Flows Exiting the Landfill Confines	<input type="checkbox"/>
	(4)	Open Burning of Refuse in Violation of Section 9 of the Act	<input type="checkbox"/>
	(5)	Uncovered Refuse Remaining From Any Previous Operating Day or at the Conclusion of Any Operating Day	<input type="checkbox"/>
	(6)	Failure to Provide Final Cover Within Time Limits	<input type="checkbox"/>
	(7)	Acceptance of Wastes Without Necessary Permits	<input checked="" type="checkbox"/>
	(8)	Scavenging as Defined by Board Regulations	<input type="checkbox"/>
	(9)	Deposition of Refuse in Any Unpermitted Portion of the Landfill	<input checked="" type="checkbox"/>
	(10)	Acceptance of Special Waste Without a Required Manifest	<input type="checkbox"/>
	(11)	Failure to Submit Reports Required by Permits or Board Regulations	<input checked="" type="checkbox"/>
	(12)	Failure to Collect and Contain Litter by the End of each Operating Day	<input type="checkbox"/>
(13)	Failure to Submit Any Cost Estimate, Performance Bond or Other Security	<input type="checkbox"/>	
11.	21(t)	CAUSE OR ALLOW A LATERAL EXPANSION OF A MUNICIPAL SOLID WASTE LANDFILL (MSWLF) UNIT WITHOUT A PERMIT MODIFICATION	<input checked="" type="checkbox"/>
12.	21.6(b)	ACCEPTANCE OF LIQUID USED OIL FOR FINAL DISPOSAL (EFFECTIVE JULY 1, 1996)	<input type="checkbox"/>
13.	22.01	FAILURE TO SUBMIT ANNUAL NONHAZARDOUS SPECIAL WASTE	<input type="checkbox"/>
14.	22.17	LANDFILL POST-CLOSURE CARE	
	(a)	Failure to Monitor Gas, Water, Settling	<input type="checkbox"/>
	(b)	Failure to Take Remedial Action	<input type="checkbox"/>
15.	22.22(c)	ACCEPTANCE OF LANDSCAPE WASTE FOR FINAL DISPOSAL	<input type="checkbox"/>
16.	22.23(f)(2)	CAUSE OR ALLOW THE DISPOSAL OF ANY LEAD-ACID BATTERY	<input type="checkbox"/>
17.	22.28(b)	ACCEPTANCE OF WHITE GOODS FOR FINAL DISPOSAL	<input type="checkbox"/>
18.	55(b)(1)	ACCEPTANCE OF ANY USED OR WASTE TIRE FOR FINAL DISPOSAL (UNLESS LANDFILL MEETS EXEMPTION OF 55(b)(1))	<input type="checkbox"/>
19.	55(k)	NO PERSON SHALL:	
	(1)	Cause or Allow Water to Accumulate in Used or Waste Tires	<input type="checkbox"/>
	(4)	Transport Used or Waste Tires in Violation of the Registration and Placarding Requirements	<input type="checkbox"/>
20.	56.1(a)	CAUSE OR ALLOW THE DISPOSAL OF ANY POTENTIALLY INFECTIOUS MEDICAL WASTE	<input type="checkbox"/>
ELECTRONIC PRODUCTS RECYCLING AND REUSE ACT REQUIREMENTS			
21.	95(a)	NO PERSON MAY KNOWINGLY CAUSE OR ALLOW THE MIXING OF A COVERED ELECTRONIC DEVICE (CED) OR OTHER LISTED DEVICE WITH MUNICIPAL WASTE THAT IS INTENDED FOR DISPOSAL AT A LANDFILL	<input type="checkbox"/>
22.	95(b)	NO PERSON MAY KNOWINGLY CAUSE OR ALLOW THE DISPOSAL OF A CED OR OTHER LISTED DEVICE IN A SANITARY LANDFILL	<input type="checkbox"/>

23.	95(c)	NO PERSON MAY KNOWINGLY CAUSE OR ALLOW THE MIXING OF A CED OR OTHER LISTED DEVICE WITH WASTE THAT IS INTENDED FOR DISPOSAL BY BURNING OR INCINERATION	<input type="checkbox"/>
24.	95(d)	NO PERSON MAY KNOWINGLY CAUSE OR ALLOW THE BURNING OR INCINERATION OF A CED OR OTHER LISTED DEVICE	<input type="checkbox"/>
SOLID WASTE SITE OPERATOR CERTIFICATION LAW REQUIREMENTS			
25.	225 ILCS 230/1004	CAUSING OF ALLOWING OPERATION OF A LANDFILL WITHOUT PROPER COMPETENCY CERTIFICATE	<input type="checkbox"/>
35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G			
PRIOR CONDUCT CERTIFICATION REQUIREMENTS			
22.	745.181	CHIEF OPERATOR REQUIREMENTS	<input type="checkbox"/>
23.	745.201	PRIOR CONDUCT CERTIFICATION PROHIBITIONS	<input type="checkbox"/>
SPECIAL WASTE HAULING REQUIREMENTS			
24.	809.301	REQUIREMENTS FOR DELIVERY OF SPECIAL WASTE TO HAULERS	<input type="checkbox"/>
25.	809.302(a)	REQUIREMENTS FOR ACCEPTANCE OF SPECIAL WASTE FROM HAULERS	<input type="checkbox"/>
26.	809.501	MANIFESTS, RECORDS, ACCESS TO RECORDS, REPORTING REQUIREMENTS AND FORMS	
	(a)	Delivery of Special Waste to Hauler	<input type="checkbox"/>
	(g)	Retention of Special Waste Manifests	<input type="checkbox"/>
NEW SOLID WASTE LANDFILL REQUIREMENTS			
	PART 811 SUBPART A	GENERAL STANDARDS FOR ALL LANDFILLS	
27.	811.103	SURFACE WATER DRAINAGE	
	(a)	Runoff from Disturbed Areas	<input type="checkbox"/>
	(b)	Diversion of Runoff from Undisturbed Areas	<input type="checkbox"/>
28.	811.104	SURVEY CONTROL	
	(a)	Boundaries Surveyed and Marked	<input checked="" type="checkbox"/>
	(b)	Stakes and Monuments Marked	<input type="checkbox"/>
	(c)	Stakes and Monuments Inspected	<input type="checkbox"/>
	(d)	Control Monument Established and Maintained	<input type="checkbox"/>
29.	811.105	COMPACTION	<input type="checkbox"/>
30.	811.106	DAILY COVER	
	(a)	Six Inches Soil	<input type="checkbox"/>
	(b)	Alternative Daily Cover	<input type="checkbox"/>
31.	811.107	OPERATING STANDARDS	
	(a)	Phasing of Operations	<input type="checkbox"/>

LPC #: 0570255197

Inspection Date: 12/17/2014

	(b)	Work Face Size and Slope	<input type="checkbox"/>
	(c)	Equipment	<input type="checkbox"/>
	(d)	Utilities	<input type="checkbox"/>
	(e)	Maintenance	<input type="checkbox"/>
	(f)	Open Burning	<input type="checkbox"/>
	(g)	Dust Control	<input type="checkbox"/>
	(h)	Noise Control	<input type="checkbox"/>
	(i)	Vector Control	<input type="checkbox"/>
	(j)	Fire Protection	<input type="checkbox"/>
	(k)	Litter Control	<input type="checkbox"/>
	(l)	Mud Tracking	<input type="checkbox"/>
	(m)	Liquid Restrictions for MSWLF Units	<input type="checkbox"/>
32.	811.108	SALVAGING	
	(a)	Salvaging Interferes with Operation	<input type="checkbox"/>
	(b)	Safe and Sanitary Manner	<input type="checkbox"/>
	(c)	Management of Salvagable Materials	<input type="checkbox"/>
33.	811.109	BOUNDARY CONTROL	
	(a)	Access Restricted	<input type="checkbox"/>
	(b)	Proper Sign Posted	<input type="checkbox"/>
34.	811.110	CLOSURE AND WRITTEN CLOSURE PLAN	
	(a)	Final Slopes and Contours	<input type="checkbox"/>
	(b)	Drainage Ways and Swales	<input type="checkbox"/>
	(c)	Final Configuration	<input type="checkbox"/>
	(d)	Written Closure Plan	<input type="checkbox"/>
	(e)	Initiation of Closure Activities at MSWLF Units	<input type="checkbox"/>
	(f)	Completion of Closure Activities at MSWLF Units	<input type="checkbox"/>
	(g)	Deed Notation for MSWLF Units	<input type="checkbox"/>
35.	811.111	POST-CLOSURE MAINTENANCE	
	(a)	Procedures After Receipt of Final Volume of Waste	<input type="checkbox"/>
	(b)	Remove All Equipment of Structures	<input type="checkbox"/>
	(c)	Maintenance and Inspection of the Final Cover and Vegetation	<input type="checkbox"/>
	(d)	Planned Uses of Property at MSWLF Units	<input type="checkbox"/>
36.	811.112	RECORDKEEPING REQUIREMENTS FOR MSWLF UNITS	
	(a)	Location Restriction Demonstration	<input type="checkbox"/>
	(b)	Load Checking Requirements	<input type="checkbox"/>
	(c)	Gas Monitoring Records	<input type="checkbox"/>
	(d)	MSWLF Liquid Restriction Records	<input type="checkbox"/>
	(e)	Groundwater Monitoring Program Requirements	<input type="checkbox"/>
	(f)	Closure and Post Closure Care Requirements	<input type="checkbox"/>
	(g)	Cost Estimates and Financial Assurance Requirements	<input type="checkbox"/>
	PART 811 SUBPART C	PUTRESCIBLE AND CHEMICAL WASTE LANDFILLS	

37.	811.302	FACILITY LOCATION	
	(c)	Site Screening (Does Not Apply To Part 814-Subpart D Sites)	<input type="checkbox"/>
38.	811.309	LEACHATE TREATMENT AND DISPOSAL SYSTEM	
	(a)	General Requirements	<input type="checkbox"/>
	(c)	Standards for On-Site Treatment and Pretreatment	<input type="checkbox"/>
	(d)	Standards for Leachate Storage System	<input type="checkbox"/>
	(e)	Standards for Discharge to Off-Site Treatment	<input type="checkbox"/>
	(f)	Standards for Leachate Recycling Systems	<input type="checkbox"/>
	(g)	Standards for Leachate Monitoring Systems	<input type="checkbox"/>
39.	811.310	LANDFILL GAS MONITORING (FOR SITES ACCEPTING PUTRESCIBLE WASTE)	
	(b)	Location and Design of Gas Monitoring Wells	<input type="checkbox"/>
	(c)	Monitoring Frequency for Landfill Gas	<input type="checkbox"/>
	(d)	Monitoring Parameters	<input type="checkbox"/>
40.	811.311	LANDFILL GAS MANAGEMENT SYSTEM (FOR CHEMICAL AND PUTRESCIBLE LANDFILLS)	
	(a)	Conditions for Installation of Gas Management System	<input type="checkbox"/>
	(b)	Notification and Implementation Requirements	<input type="checkbox"/>
	(c)	Standards for Gas Venting	<input type="checkbox"/>
	(d)	Standards for Gas Collection	<input type="checkbox"/>
41.	811.312	LANDFILL GAS PROCESS AND DISPOSAL SYSTEM	
	(c)	No Unpermitted Gas Discharge	<input type="checkbox"/>
	(d)	Gas Flow Rate Measurements into Treatment of Combustion Device	<input type="checkbox"/>
	(e)	Standards for Gas Flares	<input type="checkbox"/>
	(f)	Standards for On-Site Combustion of Landfill Gas Using Devices Other Than Flares	<input type="checkbox"/>
	(g)	Gas Transported Off-Site	<input type="checkbox"/>
42.	811.313	INTERMEDIATE COVER	
	(a)	Requirements for the Application for Intermediate Cover	<input type="checkbox"/>
	(b)	Runoff and Infiltration Control	<input type="checkbox"/>
	(c)	Maintenance of Intermediate Cover	<input type="checkbox"/>
43.	811.314	FINAL COVER SYSTEM (DOES NOT APPLY TO PART 814 SITES THAT HAVE CLOSED, COVERED AND VEGETATED PRIOR TO SEPTEMBER 18, 1990)	
	(a)	General Requirements	<input type="checkbox"/>
	(b)	Standards for Low Permeability Layer	<input type="checkbox"/>
	(c)	Standards for Final Protective Layer	<input type="checkbox"/>
44.	811.316	PLUGGING AND SEALING OF DRILL HOLES	<input type="checkbox"/>
45.	811.321	WASTE PLACEMENT	
	(a)	Phasing of Operations	<input type="checkbox"/>
	(b)	Initial Waste Placement	<input type="checkbox"/>
46.	811.322	FINAL SLOPE AND STABILIZATION	
	(a)	Grade Capable of Supporting Vegetation and Minimizing Erosion	<input type="checkbox"/>
	(b)	Slopes Required to Drain	<input type="checkbox"/>

	(c)	Vegetation	<input type="checkbox"/>
	(d)	Structures Built over the Unit	<input type="checkbox"/>
47.	811.323	LOAD CHECKING PROGRAM	
	(a)	Load Checking Program Implemented	<input type="checkbox"/>
	(b)	Load Checking Program for PCB's at MSWLF Units	<input type="checkbox"/>
	(c)	Load Checking Program Components	<input type="checkbox"/>
	(d)	Handling Regulated Hazardous Wastes	<input type="checkbox"/>
	PART 811 SUBPART D	MANAGEMENT OF SPECIAL WASTES AT LANDFILLS	
48.	811.402	NOTICE TO GENERATORS AND TRANSPORTERS	<input type="checkbox"/>
49.	811.403	SPECIAL WASTE MANIFESTS REQUIREMENTS	<input type="checkbox"/>
50.	811.404	IDENTIFICATION RECORD	
	(a)	Special Waste Profile Identification Sheet	<input type="checkbox"/>
	(b)	Special Waste Recertification	<input type="checkbox"/>
51.	811.405	RECORDKEEPING REQUIREMENTS	<input type="checkbox"/>
52.	811.406	PROCEDURES FOR EXCLUDING REGULATED HAZARDOUS WASTES	<input type="checkbox"/>
	PART 811 SUBPART G	FINANCIAL ASSURANCE	
53.	811.700	COMPLY WITH FINANCIAL ASSURANCE REQUIREMENTS OF PART 811, SUBPART G	<input type="checkbox"/>
54.	811.701	UPGRADING FINANCIAL ASSURANCE	<input type="checkbox"/>
55.	811.704	CLOSURE AND POST-CLOSURE CARE COST ESTIMATES	<input type="checkbox"/>
56.	811.705	REVISION OF COST ESTIMATE	<input type="checkbox"/>
SOLID WASTE FEE SYSTEM REQUIREMENTS			
57.	Part 858 Subpart B	MAINTAINED, RETAINED & SUBMITTED DAILY & MONTHLY SOLID WASTE RECORDS AND QUARTERLY SOLID WASTE SUMMARIES WHERE INCOMING WASTE IS WEIGHED (LIST SPECIFIC SECTION	<input type="checkbox"/>
58.	Part 858 Subpart C	MAINTAINED, RETAINED & SUBMITTED DAILY & MONTHLY SOLID WASTE RECORDS AND QUARTERLY SOLID WASTE SUMMARIES WHERE INCOMING WASTE IS NOT WEIGHED (LIST SPECIFIC	<input type="checkbox"/>
OTHER REQUIREMENTS			
59.	OTHER:	APPARENT VIOLATION OF: (<input type="checkbox"/>) PCB; (<input type="checkbox"/>) CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	<input type="checkbox"/>
60.		Permit No. 2005-121-LF, Modification No. 4, Log No. 2013-584. Special Condition I. CONSTRUCTION QUALITY ASSURANCE 7.	<input checked="" type="checkbox"/>
		Permit No. 2005-121-LF, Modification No. 4, Log No. 2013-584. Special Condition II. OPERATING CONDITIONS 4. f	<input checked="" type="checkbox"/>
		Permit No. 2005-121-LF, Modification No. 4, Log No. 2013-584. Special Condition II. OPERATING CONDITIONS 4.h	<input checked="" type="checkbox"/>

LPC #: 0570255197
 Inspection Date: 12/17/2014

		Permit No. 2005-121-LF, Modification No. 4, Log No. 2013-584. Special Condition V. GENERAL CONDITIONS 4.	<input checked="" type="checkbox"/>
		Permit No. 2005-121-LF, Modification No. 4, Log No. 2013-584, Standard Condition 2.	<input checked="" type="checkbox"/>
		Permit No. 2005-121-LF, Modification No. 4, Log No. 2013-584, Standard Condition 3.	<input checked="" type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>

Informational Notes

1. [Illinois] Environmental Protection Act: 415 ILCS 5/1 et seq.; and The Electronic Products Recycling and Reuse Act: 415 ILCS 150/5 et seq.
2. Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers. Requirements of some statutes and regulations cited are in summary format. Full text of requirements can be found in references listed in 1. and 2. above.
4. The provisions of subsection (o) of Section 21, subsection (k) of Section 55 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of that Act or by complaint under Section 31 of that Act. Violation of the Electronic Products Recycling and Reuse Act shall be enforceable by administrative citation under Section 20(k) of that Act, or referral to the Attorney General, pursuant to Section 20(a) of that Act.
5. This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d) ; and Section 20(a) of the Electronic Products Recycling and Reuse Act: 415 ILCS 150/20(a)
6. Items marked with an "NE" were not evaluated at the time of this inspection.

LPC #: 0570255197

Inspection Date: 12/17/2014

PERMIT PROVISIONS

DESCRIPTION OF VIOLATION

(condition # of permit, page # of permit, and/or page # of approved application)

PERMIT NUMBER

PERMIT NUMBER	DESCRIPTION OF VIOLATION (condition # of permit, page # of permit, and/or page # of approved application)

0570255197 -- Fulton County
Duck Creek Station Ash LF
FOS
Prepared By: Robert J. Wagner
Inspection Date: December 17, 2014
Page 1

Narrative

On December 17, 2014, I (Robert J. Wagner) conducted a solid waste inspection from 8:38 A.M. to 11:07 A.M. at Duck Creek Station Ash LF (0570255197) in Fulton County. The landfill is located on property at 17751 North Cilco Road, Canton, Illinois.

The inspection consisted of walking the landfill, photographing the physical condition of the landfill, reviewing landfill records, and interviewing Duck Creek Station Ash LF Chief Operator Robert Klahs, of Ash Management Service (AMS) and Darryl Johnson, Illinois Power Resources Generating, LLC, Environmental Manager.

The landfill was operating under Permit No. 2005-121-LF, Modification No. 4, approved on March 5, 2014.

On December 16, 2014, Rick Diericx and Tom Davis of Dynegy called Brian White of BOL/WRD- Compliance and self-reported a violation of the landfill's permit for allowing coal combustion ash to be placed outside the lined area of Cell 1A. The inspection was a result of this self-reported violation.

Inspection

I met Robert Klahs and Darryl Johnson at the landfill's office to review records. We discussed the self-reported permit violation of waste being placed outside Cell 1A's permitted boundary. For the purpose of this report, the waste boundary will be referred to as the "Toe" in this inspection report. The Toe is defined by survey and drawn on **HANSON, BASE GRADE PLAN, CCB LANDFILL – CELL 1A, CONSTRUCTION PLANS, A.E.R.G CO. DUCK CREEK POWER STATION, FULTON COUNTY, ILLINOIS, DUCK CREEK POWER STATION, DRAWING NUMBER C180-C110-06, REV. 2**. See Attachment A. This drawing is part of the operating permit application for Cell 1A, Log No. 2009-092, approved as Modification No. 2 on November 10, 2009. This drawing is part of the original submittal of the application dated and received by IEPA on February 23, 2009. Although it is not called out in the drawing legend, it is believed that the waste boundary for Cell 1A on this drawing is identified as the solid line shown around the perimeter of the Cell 1A.

According to Mr. Klahs and Mr. Johnson, the areas of Cell 1A that have been affected by the misplacement of ash are as follows: Southwest Slope, Northwest Slope, North Slope, and Northeast Slope. See Attachment A. Mr. Klahs is in the process of assessing the East Slope. The ash on the South Slope of Cell 1A does not appear to be outside of the Toe. According to Mr. Klahs and Mr. Johnson, the ash placement is approximately 5 feet past the Toe in the aforementioned areas of Cell 1A (see Attachment A). The landfill's liner extends past the Toe approximately 8 feet. Cell 1A was engineered with the liner extending past the Toe for the purpose of future expansion. The landfill estimates that 3,000 linear feet of Cell 1A is affected by the misplacement of ash. Mr. Johnson believes the ash was originally placed too close to the Toe when the landfill began operation. The ash settled past the Toe. The landfill has begun

removing all ash outside of the landfill's permitted boundary (Toe) and placing it back into the active area of the landfill.

I parted company with of Mr. Klahs and Mr. Johnson at the landfill office to meet them in the southwest corner of Cell 1A. See attached site sketch.

The landfill is using stakes adorned with red ribbon to mark the Toe of the landfill. Photographs 1 and 6 show a stake marking the location of the Toe. The stake was located at the bottom of the Southwest Slope of Cell 1A. See attached site sketch. The ash seen to the left of the stake in the photographs is past the Toe. According to Mr. Klahs, the landfill has been raking the ash off the unpermitted area and placing it back into the active area of the landfill. The removal of the ash has exposed the underlying brown clay in the area. The brown clay is on top of the liner acting as a protective layer. Photograph 2 shows the corner Southwest Slope of Cell 1A. Photographs 3, 4, and 5 show the bottom of the South Slope.

Mr. Klahs had a hole dug at the foot of the Toe. This was done to get an idea of how much ash had been misplaced past the Toe in that area of Cell 1A. Photographs 7 and 9 show the hole that was dug in the bottom of the Southwest Slope. See attached site sketch. Photograph 8 shows a stake at the bottom of the Southwest Slope marking the location of the Toe. The ash seen to the left of the stake in the photograph is past the Toe.

Photographs 10, 12, and 13 show the bottom of the mid-section of the Northwest Slope of Cell 1A. See the attached site sketch. The removal of the ash has exposed the underlying brown clay in the area. Photograph 11 shows the top of the mid-section of the Northwest Slope of Cell 1A.

Photographs 14, 15, and 17 show the bottom of the upper Northwest Slope of Cell 1A. The removal of the ash has exposed the underlying brown clay in the area. Photograph 16 shows a stake located on the bottom of the upper Northwest Slope of Cell 1A marking the location of the Toe.

Photograph 18 shows the bottom of the North Slope of Cell 1A. See the attached site sketch. The removal of the ash has exposed the underlying brown clay in the area.

Photographs 19 and 21 show the bottom of the Northeast Slope of Cell 1A. The removal of the ash has exposed the underlying brown clay in the area. Photograph 20 shows a stake marking the location of the Toe at the bottom of the Northeast Slope of Cell 1A. See attached site sketch.

Photograph 22 shows an excavator being used to rake back the ash at the bottom of the mid-section of the East Slope of Cell 1A. See attached site sketch. Photograph 23 shows the bottom of the Southeast Slope. Photograph 24 shows a stake marking the location of the Toe at the bottom of the Southeast Slope of Cell 1A. See attached site sketch. The ash seen to the right of the stake in the photograph is past the Toe. The landfill has not begun to remove the ash that is outside of the permitted boundary in this area of Cell 1A.

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Duck Creek Station Ash LF
FOS
Prepared By: Robert J. Wagner
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Page 3

Photographs 25 and 26 show the leachate collection system, spillway, and the bottom of the South Slope of Cell 1A. Photograph 27 shows the Southeast corner Slope of Cell 1A. It appears that the South Slope of Cell 1A has not been affected by the misplacement of the ash. The South Slope is going to be the portion of the landfill that will be tied into Cell 2.

Engineers preparing for the expansion into Cell 2 discovered the mistake during a survey of Cell 1A. Mr. Johnson believes that the misplacement of ash began when the landfill started operating in 2009. At the time, the landfill was owned and operated by Ameren. However, in the last two years the landfill has undergone some major personnel changes. On December 2, 2013, Ameren Corporation (Ameren) sold its merchant generating business to Illinois Power Holdings, LLC (IPH), a Dynegy Inc. subsidiary. On March 5, 2014, Permit No. 2005-121-LF, Modification No. 4 approved the transfer of Permit No. 2005-121-LF from "Ameren Corporation" as owner and "Ameren Energy Generating Company" as operator to "Illinois Power Resources Generating, LLC" as owner and operator.

The landfill has had as many as six Chief Operators since it began operation in 2009. The mistake could have taken place with any of these Chief Operators. Mr. Klahs has been following landfill protocol in the placement of ash in Cell 1A. Mr. Klahs said the ash had been placed outside of Cell 1A permitted boundary before he took over as Chief Operator. Mr. Klahs has never instructed any of his personnel to place ash in any unpermitted portions of the landfill.

I departed the site at 11:07 A.M.

The landfill has deposited ash outside of Cell 1A's permitted boundary without a permit modification granted by the Agency. The permit requires that the landfill be resurveyed every five years. After reviewing landfill records, no survey has been submitted to the Agency since May of 2008. According to Agency records, the last survey of the landfill was accomplished in May of 2008.

The following alleged violations were observed and indicated on the Inspection Checklist:

1. Pursuant to Section 21(d)(1) of the Act, in relevant part, no person shall conduct any waste-storage, waste-treatment, or waste-disposal operation without a permit granted by the Agency or in violation of any conditions imposed by such permit, including periodic reports and full access to adequate records and the inspection of facilities, as may be necessary to assure compliance with this Act and with regulations and standards adopted there under.

A violation of Section 21(d)(1) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(d)(1)) is alleged for the following reason: **Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs(as Chief Operator) failed to comply with the following operating conditions in Permit No. 2005-121-LF, Modification No. 4, Log No. 2013-584:**

- **Permit No. 2005-121-LF, Modification No. 4, Log No. 2013-584. Special Condition I. CONSTRUCTION QUALITY ASSURANCE 7. All stakes and monuments marking the facility boundary and the permitted disposal area shall be maintained, inspected annually and surveyed no less frequently than once in five years by a professional land surveyor. Any lost or damaged monuments shall be replaced.**

Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs (as Chief Operator) failed to survey the landfill within five years of it previous survey (May of 2008).

- **Permit No. 2005-121-LF, Modification No. 4, Log No. 2013-584. Special Condition II. OPERATING CONDITIONS 4. The operator of this solid waste facility shall not conduct the operation in a manner which results in any of the following:**

f. acceptance of wastes without necessary permits.

Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs (as Chief Operator) accepted waste in an unpermitted portion of the landfill.

- **Permit No. 2005-121-LF, Modification No. 4, Log No. 2013-584. Special Condition II. OPERATING CONDITIONS 4. The operator of this solid waste facility shall not conduct the operation in a manner which results in any of the following:**

h. deposition of refuse in any unpermitted (i.e., without an Illinois EPA approved significant modification authorizing operation) portion of the landfill.

Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs (as Chief Operator) deposited waste in an unpermitted portion of the landfill.

- **Permit No. 2005-121-LF, Modification No. 4, Log No. 2013-584. Special Condition V. GENERAL CONDITIONS 4. Pursuant to 35 IAC, Section 813.201(a), any modifications to this permit shall be proposed in the form of a permit application and submitted to the Illinois EPA.**

Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs (as Chief Operator) failed to submit a permit application to the Illinois EPA for a permit modification.

- **Permit No. 2005-121-LF, Modification No. 4, Log No. 2013-584, Standard Condition 2.** The construction or development of facilities covered by this permit shall be done in compliance with applicable provisions of Federal laws and regulations, the Illinois Environmental Protection Act, and Rules and Regulations adopted by the Illinois Pollution Control Board.

Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs (as Chief Operator) did not comply with the applicable provisions of the Illinois Environmental Protection Act and Illinois Pollution Control Board Regulations during the development of the landfill.

- **Permit No. 2005-121-LF, Modification No. 4, Log No. 2013-584, Standard Condition 3.** There shall be no deviation from the approved plans and specifications unless a written request for modification of the project, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.

Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs (as Chief Operator) deviated from the approved plans and specifications without a written request for modification submitted to the Agency and a supplemental written permit issued.

2. Pursuant to Section 21(d)(2) of the Act, no person shall conduct any waste-storage, waste-treatment, or waste-disposal operation in violation of any regulations or standards adopted by the Board under this Act.

A violation of Section 21(d)(2) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(d)(2)) is alleged for the following reason: **Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs (as Chief Operator) conducted a waste-disposal operation in violation of Section 811.104(a) of the Regulations.**

3. Pursuant to Section 21(e) of the Act, no person shall dispose, treat, store or abandon any waste, or transport any waste into this State for disposal, treatment, storage or abandonment, except at a site or facility which meets the requirements of this Act and of regulations and standards there under.

A violation of Section 21(e) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(e)) is alleged for the following reason: **Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs (as Chief Operator) conducted a waste-disposal operation in violation of 21(d)(1), 21(d)(2), 21(o)(7), 21(o)(9), 21(o)(11), and 21(t) of the Act and Section 811.104(a) of the Regulations.**

4. Pursuant to Section 21(o)(7) of the Act, no person shall conduct a sanitary landfill operation which is required to have a permit under subsection (d) of this Section, in a manner which results in acceptance of wastes without necessary permits.

A violation of Section 21(o)(7) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(o)(7)) is alleged for the following reason: **Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs (as Chief Operator) disposed of waste outside of Cell 1A permitted boundary.**

5. Pursuant to Section 21(o)(9) of the Act, no person shall conduct a sanitary landfill operation which is required to have a permit under subsection (d) of this Section, in a manner which results in deposition of refuse in any unpermitted portion of the landfill.

A violation of Section 21(o)(9) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(o)(9)) is alleged for the following reason: **Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs (as Chief Operator) disposed of waste outside of Cell 1A permitted boundary.**

6. Pursuant to Section 21(o)(11) of the Act, no person shall conduct a sanitary landfill operation which is required to have a permit under subsection (d) of this Section, in a manner which results in failure to submit reports required by permits or Board regulations.

A violation of Section 21(o)(11) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(o)(11)) is alleged for the following reason: **Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs (as Chief Operator) failed to survey the landfill within five years of it previous survey (May of 2008).**

7. Pursuant to Section 21(t) of the Act, no person shall cause or allow a lateral expansion of a municipal solid waste landfill unit on or after October 9, 1993, without a permit modification, granted by the Agency, that authorized the lateral expansion.

A violation of Section 21(t) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(t)) is alleged for the following reason: **Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs (as Chief Operator) failed to obtain a permit modification, granted by the Agency, that authorized the lateral expansion of Cell 1A.**

8. Pursuant to 35 Ill. Adm. Code 811.104(a), the boundaries of all waste disposal units, property boundaries, disturbed areas, and the permit area for facilities subject to the requirements of Section 21 of the Environmental Protection Act (Act) (Ill. Rev. Stat. 1989, ch. 111 2, par. 1021) shall be surveyed and marked by a professional land surveyor.

0570255197 -- Fulton County

Duck Creek Station Ash LF

FOS

Prepared By: Robert J. Wagner

Inspection Date: December 17, 2014

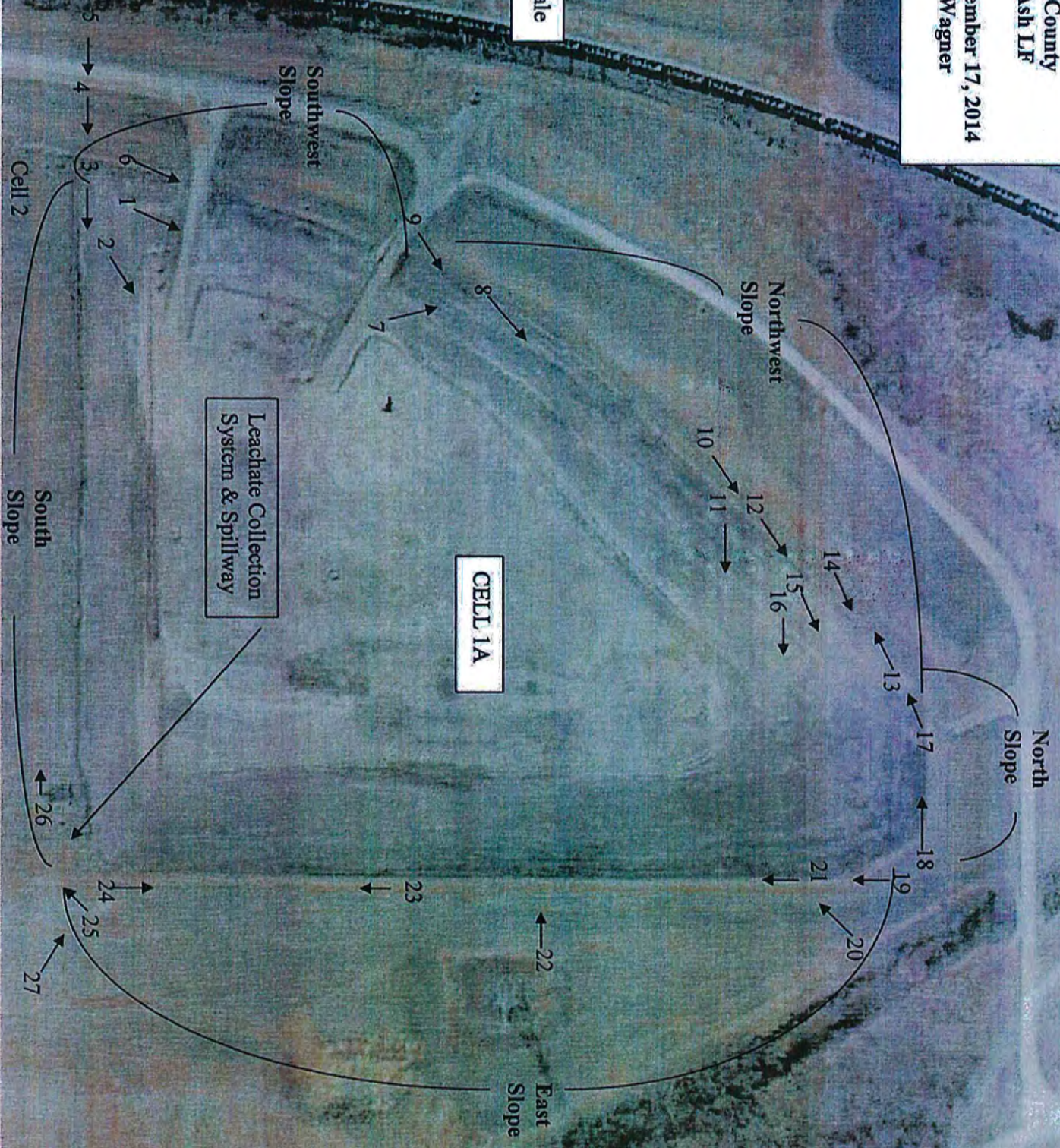
Page 7

A violation of 35 Ill. Adm. Code 811.104(a) is alleged for the following reason: **Illinois Power Resources Generating, LLC (as owner and operator) and Robert Klahs (as Chief Operator) failed to survey the landfill within five years of its previous survey (May of 2008).**

0570255197 - Fulton County
Duck Creek Station Ash LF
FOS
Inspection Date: December 17, 2014
Inspector: Robert J. Wagner
Site Sketch



Drawing Not To Scale





DATE: December 17, 2014

TIME: 10:29 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the north.

PHOTOGRAPH NUMBER: 1

PHOTOGRAPH FILE NAME:
0570255197~12172014-001.jpg

COMMENTS: The photograph
shows the southwest corner slope of
Cell 1A.



DATE: December 17, 2014

TIME: 10:30 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the northeast.

PHOTOGRAPH NUMBER: 2

PHOTOGRAPH FILE NAME:
0570255197~12172014-002.jpg

COMMENTS: The photograph
shows the southwest corner slope of
Cell 1A.





DATE: December 17, 2014

TIME: 10:31 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the east.

PHOTOGRAPH NUMBER: 3

PHOTOGRAPH FILE NAME:
0570255197~12172014-003.jpg

COMMENTS: The photograph
shows the south slope of Cell 1A.



DATE: December 17, 2014

TIME: 10:31 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the northeast.

PHOTOGRAPH NUMBER: 4

PHOTOGRAPH FILE NAME:
0570255197~12172014-004.jpg

COMMENTS: The photograph
shows the south slope of Cell 1A.





DATE: December 17, 2014

TIME: 10:31 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the east.

PHOTOGRAPH NUMBER: 5

PHOTOGRAPH FILE NAME:
0570255197~12172014-005.jpg

COMMENTS: The photograph
shows the south slope of Cell 1A.



DATE: December 17, 2014

TIME: 10:32 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the north.

PHOTOGRAPH NUMBER: 6

PHOTOGRAPH FILE NAME:
0570255197~12172014-006.jpg

COMMENTS: The photograph
shows the southwest slope of Cell
1A.





DATE: December 17, 2014

TIME: 10:34 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the northwest.

PHOTOGRAPH NUMBER: 7

PHOTOGRAPH FILE NAME:
0570255197~12172014-007.jpg

COMMENTS: The photograph
shows a hole that was dug to find
the end of the liner.



DATE: December 17, 2014

TIME: 10:35 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the northeast.

PHOTOGRAPH NUMBER: 8

PHOTOGRAPH FILE NAME:
0570255197~12172014-008.jpg

COMMENTS: The photograph
shows the western slope of Cell 1A.





DATE: December 17, 2014

TIME: 10:35 AM

PHOTOGRAPHED BY:

Robert J. Wagner

DIRECTION: Photograph taken
toward the northeast.

PHOTOGRAPH NUMBER: 9

PHOTOGRAPH FILE NAME:
0570255197~12172014-009.jpg

COMMENTS: The photograph
shows the western slope of Cell 1A.



DATE: December 17, 2014

TIME: 10:38 AM

PHOTOGRAPHED BY:

Robert J. Wagner

DIRECTION: Photograph taken
toward the northeast.

PHOTOGRAPH NUMBER: 10

PHOTOGRAPH FILE NAME:
0570255197~12172014-010.jpg

COMMENTS: The photograph
shows the western slope of Cell 1A.



DOCUMENT FILE NAME:

0570255197~12172014.doc



DATE: December 17, 2014

TIME: 10:38 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the northeast.

PHOTOGRAPH NUMBER: 11

PHOTOGRAPH FILE NAME:
0570255197~12172014-011.jpg

COMMENTS: The photograph
shows the western slope of Cell 1A.



DATE: December 17, 2014

TIME: 10:38 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the northeast.

PHOTOGRAPH NUMBER: 12

PHOTOGRAPH FILE NAME:
0570255197~12172014-012.jpg

COMMENTS: The photograph
shows the western slope of Cell 1A.





DATE: December 17, 2014

TIME: 10:41 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the southwest.

PHOTOGRAPH NUMBER: 13

PHOTOGRAPH FILE NAME:
0570255197~12172014-013.jpg

COMMENTS: The photograph
shows the western slope of Cell 1A.



DATE: December 17, 2014

TIME: 10:41 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the northeast.

PHOTOGRAPH NUMBER: 14

PHOTOGRAPH FILE NAME:
0570255197~12172014-014.jpg

COMMENTS: The photograph
shows the northwest slope of Cell
1A.





DATE: December 17, 2014

TIME: 10:41 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the northeast.

PHOTOGRAPH NUMBER: 15

PHOTOGRAPH FILE NAME:
0570255197~12172014-015.jpg

COMMENTS: The photograph
shows the northwest slope of Cell
1A.



DATE: December 17, 2014

TIME: 10:41 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the northeast.

PHOTOGRAPH NUMBER: 16

PHOTOGRAPH FILE NAME:
0570255197~12172014-016.jpg

COMMENTS: The photograph
shows the northwest slope of Cell
1A.





DATE: December 17, 2014

TIME: 10:41 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the southwest.

PHOTOGRAPH NUMBER: 17

PHOTOGRAPH FILE NAME:
0570255197~12172014-017.jpg

COMMENTS: The photograph
shows the northwest slope of Cell
1A.



DATE: December 17, 2014

TIME: 10:43 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the west.

PHOTOGRAPH NUMBER: 18

PHOTOGRAPH FILE NAME:
0570255197~12172014-018.jpg

COMMENTS: The photograph
shows the north slope of Cell 1A.





DATE: December 17, 2014

TIME: 10:43 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the south.

PHOTOGRAPH NUMBER: 19

PHOTOGRAPH FILE NAME:
0570255197~12172014-019.jpg

COMMENTS: The photograph
shows the east slope of Cell 1A.



DATE: December 17, 2014

TIME: 10:43 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the southwest.

PHOTOGRAPH NUMBER: 20

PHOTOGRAPH FILE NAME:
0570255197~12172014-020.jpg

COMMENTS: The photograph
shows the east slope of Cell 1A.





DATE: December 17, 2014

TIME: 10:44 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the south.

PHOTOGRAPH NUMBER: 21

PHOTOGRAPH FILE NAME:
0570255197~12172014-021.jpg

COMMENTS: The photograph
shows the east slope of Cell 1A.



DATE: December 17, 2014

TIME: 10:46 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the west.

PHOTOGRAPH NUMBER: 22

PHOTOGRAPH FILE NAME:
0570255197~12172014-022.jpg

COMMENTS: The photograph
shows the east slope of Cell 1A.



DOCUMENT FILE NAME:
0570255197~12172014.doc



DATE: December 17, 2014

TIME: 10:47 AM

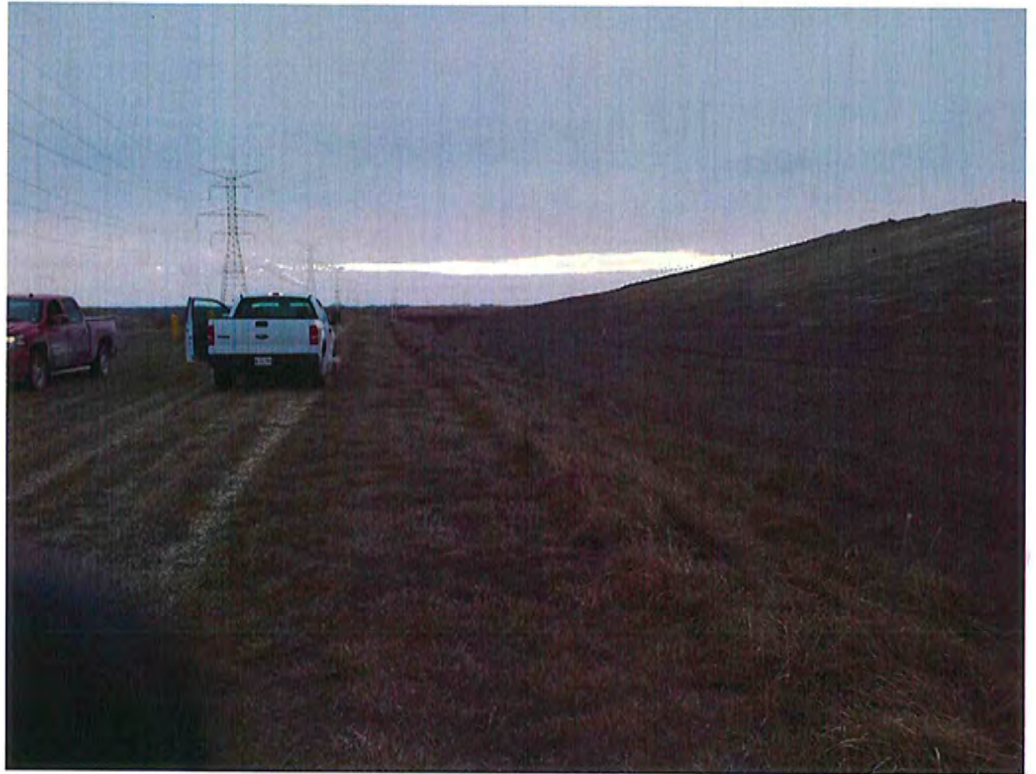
PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the south.

PHOTOGRAPH NUMBER: 23

PHOTOGRAPH FILE NAME:
0570255197~12172014-023.jpg

COMMENTS: The photograph
shows the east slope of Cell 1A.



DATE: December 17, 2014

TIME: 10:48 AM

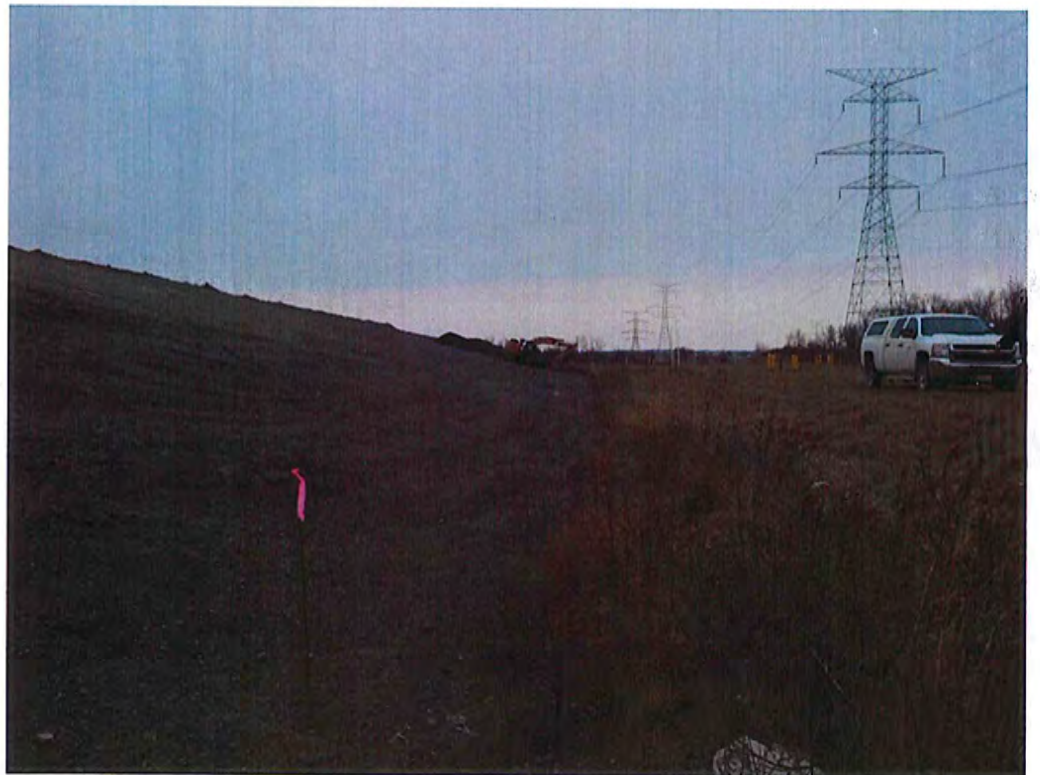
PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the north.

PHOTOGRAPH NUMBER: 24

PHOTOGRAPH FILE NAME:
0570255197~12172014-024.jpg

COMMENTS: The photograph
shows the southeast slope of Cell
1A.



DOCUMENT FILE NAME:
0570255197~12172014.doc



DATE: December 17, 2014

TIME: 10:48 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the southwest.

PHOTOGRAPH NUMBER: 25

PHOTOGRAPH FILE NAME:
0570255197~12172014-025.jpg

COMMENTS: The photograph
shows the leachate collection
system and spillway for Cell 1A.



DATE: December 17, 2014

TIME: 10:49 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the west.

PHOTOGRAPH NUMBER: 26

PHOTOGRAPH FILE NAME:
0570255197~12172014-026.jpg

COMMENTS: The photograph
shows the leachate collection
system and spillway for Cell 1A.



DOCUMENT FILE NAME:
0570255197~12172014.doc



DATE: December 17, 2014

TIME: 10:49 AM

PHOTOGRAPHED BY:
Robert J. Wagner

DIRECTION: Photograph taken
toward the northwest.

PHOTOGRAPH NUMBER: 27

PHOTOGRAPH FILE NAME:
0570255197~12172014-027.jpg

COMMENTS: The photograph
shows the southeast corner slope of
Cell 1A.





LLC FILE DETAIL REPORT

Entity Name	ILLINOIS POWER RESOURCES GENERATING, LLC	File Number	04536304
Status	ACTIVE	On	11/14/2014
Entity Type	LLC	Type of LLC	Foreign
File Date	11/27/2013	Jurisdiction	DE
Agent Name	CAPITOL CORPORATE SERVICES INC	Agent Change Date	01/28/2014
Agent Street Address	1315 W LAWRENCE AVE	Principal Office	601 TRAVIS ST STE 1400 HOUSTON, TX 770020000
Agent City	SPRINGFIELD	Management Type	MBR View
Agent Zip	62704	Duration	PERPETUAL
Annual Report Filing Date	11/14/2014	For Year	2014
Old LLC Name	12/23/2013 - NEW AERG, LLC		
Series Name	NOT AUTHORIZED TO ESTABLISH SERIES		

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(One Certificate per Transaction)

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PROOF OF SERVICE

I hereby certify that I did on the 29th day of January 2015, send by Certified Mail, Return Receipt Requested, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and 811 SOLID WASTE LANDFILL INSPECTION CHECKLIST


To: Illinois Power Resources Generating, LLC
c/o Capitol Corporate Services Inc.
1315 W. Lawrence Avenue
Springfield, Illinois 62704

Robert Klahs
760 Wickeleigh Terrace
Fenton, Missouri 63028



and the original and nine (9) true and correct copies of the same foregoing instruments on the same date by Certified Mail, Return Receipt Requested, with postage thereon fully prepaid

To: John Therriault, Clerk
Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601


Michelle M. Ryan
Assistant Counsel

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544