BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	PCB AS 2021-008
PETITION OF AMEREN ENERGY	)	(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 Medina Valley Cogen, LLC's Response to Illinois Environmental Protection Agency's Recommendations, a copy of which is herewith served upon you.

Dated: September 17, 2026

AMEREN ENERGY MEDINA VALLEY COGEN, LLC

By: __/s/Kristen L. Gale _____

Kristen L. Gale
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Craig S. Thedwall
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Rebecca.Strauss@illinois.gov
Brian.Navarrete@illinois.gov

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true copy of the foregoing Notice of Filing and Ameren Energy Medina Valley Cogen, LLC's Response to Illinois Environmental Protection Agency's Recommendation was electronically filed on September 17, 2026 with the following:

Don Brown, Clerk of the Board
Illinois Pollution Control Board
60 E. Van Buren Street, Suite 630
Chicago, IL 60605
don.brown@illinois.gov

and that a copy was sent via e-mail on September 17, 2026 to the parties on the service list.

Dated: September 17, 2026 /s/Kristen L. Gale

Kristen L Gale
Susan M. Franzetti
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(312) 251-5590
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sf@nijmanfranzetti.com
ct@nijmanfranzetti.com

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
PETITION OF AMEREN ENERGY MEDINA	)	AS 21-008
VALLEY COGEN, LLC (OLD MEREDOSIA)	)	(Adjusted Standard - Land)
FOR ADJUSTED STANDARDS	)	
FROM 35 ILL. ADMIN. CODE PART 845	)	

AMEREN ENERGY MEDINA VALLEY COGEN, LLC'S RESPONSE TO ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S RECOMMENDATION

Illinois Environmental Protection Agency ("Illinois EPA" or "Agency") cannot see the forest for the trees. Ameren Energy Medina Valley Cogen, LLC ("Ameren") has presented a logical and reasonable alternative to a Part 845 closure that preserves the natural resources on the surface of the Old Meredosia Pond while treating the groundwater underneath, resulting in a proverbial "win-win" for a unique site that was never intended to be captured by the coal combustion residual ("CCR") surface impoundment rules. Illinois EPA's only response is a slavish adherence to the CCR surface impoundment rules in Part 845 without any technical basis.

Ameren will thoroughly respond to and rebut the Agency's various claims in its Recommendation at the hearing on November 17 and 18, 2026. Accordingly, the absence of a response here to any of the Agency's statements should not be considered a waiver of any argument or an acceptance of their claims. However, there are three critical issues that need to be addressed before the hearing. First, Illinois EPA's narrow reading of the Federal CCR surface impoundment rule to support its baseless claim that the Old Meredosia pond is a federal Legacy CCR surface impoundment is incorrect, because the Old Meredosia Pond does not contain free liquids. Further, even if it were a Legacy CCR surface impoundment, which

it is not, U.S.EPA's recently proposed modification for the closure of CCR surface impoundments will establish flexible closure performance standards, which is remarkably similar to Ameren's proposal here. Second, Illinois EPA grossly misrepresented the communications between Ameren and the Agency by omitting the numerous meetings held between the two parties, including Ameren hosting the Agency at the Meredosia Station. Third and finally, in response to Illinois EPA's repeated requests, if the Illinois Pollution Control Board ("Board") were to grant Ameren's petition and allow Ameren to close the Old Meredosia Pond with the permeable reactive barrier ("PRB"), then Ameren would also agree to attach a conservation easement to the Old Meredosia Pond to preserve the natural resources on the surface.

I. Old Meredosia Pond is Not a Federal CCR Surface Impoundment

Illinois EPA's interpretation of the definition of a legacy CCR surface impoundment is more expansive than U.S.EPA's intent. Illinois EPA's Recommendation states that any amount of precipitation could capture any area of CCR as a CCR surface impoundment. Instead, U.S.EPA limits the definition for a CCR surface impoundment that "Contains both CCR and liquids" to an impoundment that has not demonstrated it has eliminated all free liquids. 40 C.F.R. §257.53. Indeed, U.S.EPA clarified that "a unit whose periodic rainfall does not result in free liquids (*e.g.* is readily absorbed into the CCR) would not be regulated as a legacy CCR surface impoundment." *Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities; Legacy CCR Surface Impoundments*, 89 Fed. Reg. 38950, at 38990 (May 8, 2024). U.S.EPA made it clear that it was targeting impoundments that pose a significant risk because they continue to "contain liquids" and used two examples of a unit constructed such that CCR "was continually saturated by water flowing freely through the impoundment and where the facility only

removed the standing water from the impoundment. *Id*. U.S.EPA considered these types of impoundments to be the "overwhelming majority of legacy impoundments subject to the final rule…" *Id.*

It is clear that U.S.EPA was not targeting ponds like Old Meredosia, because Old Meredosia is not continually saturated with water. Rather, Ameren ceased discharging water to the pond long ago, no water collects in the pond, and the groundwater is not in contact with the base of the pond. Further, a Licensed Professional Engineer reviewed the Old Meredosia Pond and concluded that Old Meredosia does not contain "free liquids" and therefore is not a Legacy CCR surface impoundment.

Further, even if Old Meredosia were a Legacy CCR Surface Impoundment, which it is not, U.S.EPA is implementing modifications to the federal rule that would allow site-specific closure methods very similar to the flexibility allowed by the adjusted standard statute in Section 28.1 of the Illinois Environmental Protection Act. 415 ILCS 5/28.1. On April 13, 2026, U.S.EPA proposed modifications to the Part 257 closure requirements to allow more flexible performance standards that account for site-specific data, while also achieving the standard of "no reasonable probability of adverse effects on health or the environment." *Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities; Legacy/CCRMU Amendments*, 91 Fed. Reg. 18969 at 18973 (April 13, 2026). In U.S.EPA's proposed rule, a CCR surface impoundment may be closed pursuant to risk-based, alternative performance standards that meet the RCRA Subtitle D protectiveness standard of "no reasonable probability of adverse effects to human health and the environment" based upon site-specific data and risk assessment. *Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals from Electric Utilities;*

Legacy/CCRMU Amendments, 91 Fed. Reg. 18969 at 19022 (April 13, 2026). U.S.EPA's proposal is practically identical to the standard for an adjusted standard in Illinois, which allows an adjustment from a rule based upon site specific data when the adjusted standard will not result in more adverse environmental and health effects. 415 ILCS 28.1. Here, Ameren has provided to the Board significant studies and data to demonstrate that the Old Meredosia Pond does not present a risk to human health and the environment and that an alternative closure method of treating the groundwater will not result in adverse effects to human health and the environment. *See* Amended Petition Exhibits and Second Amended Petition Exhibits. Given that U.S.EPA recognizes that rigid adherence to the two closure methods is not necessary to address the potential risks posed by a CCR surface impoundment and given that Illinois already has established a similar flexibility in its own statute, the Board should be satisfied that the alternative closure method proposed here to treat the groundwater such that the natural resources on the surface may be preserved may be granted.

II. Ameren's Significant Outreach to Illinois EPA

Ameren is surprised and disappointed by Illinois EPA's mischaracterization of Ameren's outreach to Illinois EPA for its proposal to install an PRB as an alternative to treat the groundwater under the Old Meredosia Pond. In its Recommendation, Illinois EPA claimed that it provided to Ameren its letter on February 3, 2026 and also claimed that Ameren provided no response. *See* Illinois EPA Rec., p. 2. Both of those claims are incorrect. Instead, Ameren worked diligently to present to Illinois EPA its proposed alternative, including conducting significant outreach, scheduling meetings, and answering questions.

Following successful completion of the treatability study for the PRB, on February 3, 2026, Ameren conducted a meeting with Illinois EPA to present the successful treatability study results and the proposal to install the PRB. Following the meeting, Ameren forwarded

its presentation to Illinois EPA so that Illinois EPA could review and submit any additional questions. *See* Ex. A (Feb. 25, 2026 Ameren email with attached presentation). Further, at the February 3, 2026 meeting, Illinois EPA requested an opportunity to visit Old Meredosia Pond. Because Ameren sought to work with the Agency, Ameren readily agreed. Given that the Old Meredosia Plant is closed and without employees, Ameren worked to find a mutually agreeable date in which both its out-of-state personnel and Illinois EPA could visit. On April 30, 2026, Ameren hosted Illinois EPA, including Illinois EPA's witness Joshua Rhodes, at the Meredosia Station to show them the Old Meredosia Pond and natural resources on the surface. During the visit, Ameren answered each of the Agency's questions and gave them full access to the area.

On April 15, 2026, Ameren provided to Illinois EPA a copy of the Preliminary Work Plan for installation of the PBR. Ameren followed up the Work Plan with a request for a meeting to discuss the Work Plan and address any of the Illinois EPA's questions. Contrary to the Agency's claim in its Recommendation, on May 28, 2026, Illinois EPA sent the unsigned and undated letter to Ameren that is attached to its Recommendation. *See* Ex. B (May 28, 2026 IEPA email with attached letter). On May 28, 2026, Ameren and Illinois EPA met, in which Ameren attempted to address the Agency's general questions in its May 28, 2026 letter, again contrary to the Agency's claim of a lack of communication by Ameren. *See* Illinois EPA Rec., p. 2.

III. Ameren Would Place a Conservation Easement on Old Meredosia If Board Grants Adjusted Standard

Given Illinois EPA's concerns regarding maintaining the natural resources on the surface of Old Meredosia, Ameren would agree to attaching a conservation easement to the Old Meredosia Site if the Board grants Ameren's request for an adjusted standard to install a PRB.

Pursuant to Section 104.418 of the Board's Rules, a petition may be amended at any time and may be made orally at hearing. 35 Ill. Adm. Code 104.418. Accordingly, Ameren will orally amend the Petition at the hearing to include a requirement to attach a conservation easement in addition to installing the PRB. However, given that all parties agree that closing Old Meredosia would destroy the natural resources on the surface, should the Board deny Ameren's Petition, then no conservation easement is necessary.

IV. Conclusion

WHEREFORE, for all the foregoing reasons Ameren Energy Medina Valley Cogen, LLC respectfully requests that its Second Amended Petition for adjusted standards be granted and the Board provide Ameren the relief requested.

Dated: September 17, 2026

Respectfully submitted,

Ameren Energy Medina Valley Cogen, LLC, Petitioner

By: /s/ Kristen L. Gale
One of its Attorneys

Kristen L. Gale
Susan M. Franzetti
Craig Thedwall
Nijman Franzetti LLP
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Electronic Filing: Received, Clerk's Office 09/17/2026

EXHIBIT A

Kristen Gale

From: Kristen Gale
Sent: Wednesday, February 25, 2026 5:04 PM
To: 'Navarrete, Brian'
Subject: RE: PCB21-08
Attachments: 26.01.30_Meredosia PRB - Final.pdf

Hi Brian:

Here is the presentation on the proposed treatment. Please let me know if you have any questions.

Thanks!
Kristen

Kristen Laughridge Gale | Nijman Franzetti LLP
T: 312-262-5524
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From: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Sent: Tuesday, February 24, 2026 9:49 AM
To: Kristen Gale <kg@nijmanfranzetti.com>
Subject: RE: PCB21-08

Hi Kristen,

I hope all is well.

BOL is starting higher level discussions about the AS. However, they realized that they need to review the presentation instead of referring to their notes. Would you send me a copy?

Thanks,

Brian Navarrete
Land Enforcement Attorney
Department of Legal Counsel
217-558-3501
Brian.Navarrete@illinois.gov

Join our team: Illinois EPA Employment

From: Kristen Gale <kg@nijmanfranzetti.com>
Sent: Monday, February 2, 2026 8:56 AM
To: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Subject: [External] RE: PCB21-08

Brian:

Thanks for checking again – attached please find a proposed agenda. I've also attached the Haley & Aldredge and WSP reports that were attached to Ameren's Amended Petition. The results of these reports will be discussed as part of the background discussion.

We look forward to talking with you tomorrow.
Kristen

Kristen Laughridge Gale | Nijman Franzetti LLP
T: 312-262-5524
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From: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Sent: Monday, February 2, 2026 8:27 AM
To: Kristen Gale <kg@nijmanfranzetti.com>
Subject: RE: PCB21-08

Hi Kristen,

My team is eager to review the agenda before the call tomorrow. Will you be sending it today?

Thanks,

Brian Navarrete
Land Enforcement Attorney
Department of Legal Counsel
217-558-3501
Brian.Navarrete@illinois.gov

Join our team: Illinois EPA Employment

From: Kristen Gale <kg@nijmanfranzetti.com>
Sent: Thursday, January 29, 2026 3:02 PM
To: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Subject: [External] RE: PCB21-08

Sorry for the multiple emails – but the materials filed with the Board for the adjusted standard are a good place to start.

In addition to being filed with the Board, I know the Bureau of Water attorneys on the matter (Sara Terranova, Charles Matoesian, and Rebecca Strauss) have a least one (but I think two) hard copies of the filings in binders. They were exhibits in the depositions taken last year. The hard copies are in color and have pull out maps – which I expect would be easier to read.

Kristen

Kristen Laughridge Gale | Nijman Franzetti LLP
T: 312-262-5524
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From: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Sent: Thursday, January 29, 2026 2:58 PM
To: Kristen Gale <kg@nijmanfranzetti.com>
Subject: RE: PCB21-08

Hi Kristen,

Thanks for the quick response.

I had one additional question from my team. Has your client set up a facility website under 845.810? We were hoping to review ahead of the meeting if one exists. If so, could you provide a link?

Thanks,

Brian Navarrete
Land Enforcement Attorney
Department of Legal Counsel
217-558-3501
Brian.Navarrete@illinois.gov

Join our team: Illinois EPA Employment

From: Kristen Gale <kg@nijmanfranzetti.com>
Sent: Thursday, January 29, 2026 2:39 PM
To: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Subject: [External] RE: PCB21-08

Hi Brian – we are working on one. I'm meeting with the client tomorrow, and will get it to you afterwards.

Thanks for checking in.

Kristen

Kristen Laughridge Gale | Nijman Franzetti LLP
T: 312-262-5524
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From: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Sent: Thursday, January 29, 2026 2:38 PM
To: Kristen Gale <kg@nijmanfranzetti.com>
Subject: RE: PCB21-08

Hi Kristen,

I am hoping to be able to get a copy of the agenda for our Tuesday meeting. Do you have one I could send around to my team?

Thanks,

Brian Navarrete
Land Enforcement Attorney
Department of Legal Counsel
217-558-3501
Brian.Navarrete@illinois.gov

Join our team: Illinois EPA Employment

From: Kristen Gale <kg@nijmanfranzetti.com>
Sent: Friday, January 16, 2026 9:59 AM
To: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Subject: [External] RE: PCB21-08

Hi Brian:

I do – I'm open between 10:30-1 today. Feel free to give me a call on my cell: 217-390-0309

Thanks
Kristen

Kristen Laughridge Gale | Nijman Franzetti LLP
T: 312-262-5524
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From: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Sent: Friday, January 16, 2026 9:44 AM
To: Kristen Gale <kg@nijmanfranzetti.com>
Subject: RE: PCB21-08

Employee Shield
Warning: Sender @Brian.Navarrete@Illinois.gov is not yet trusted by your organization.
Please be careful before replying or clicking on the URLs.
Report Phishing Block as Spam Trust Sender
powered by Graphus®

Hi Kristen,

I left you a voice mail. Let me know if you have time to discuss this matter.

Thanks,

Brian Navarrete

Land Enforcement Attorney

Department of Legal Counsel

217-558-3501

Brian.Navarrete@illinois.gov

Join our team: Illinois EPA Employment

From: Kristen Gale <kg@nijmanfranzetti.com>
Sent: Thursday, January 15, 2026 9:46 AM
To: Jarvis, Melanie <Melanie.Jarvis@Illinois.gov>
Cc: Navarrete, Brian <Brian.Navarrete@Illinois.gov>; Ryan, Michelle <Michelle.Ryan@Illinois.gov>; Samson, Sara B. <Sara.Samson@Illinois.gov>; Diers, Stefanie <Stefanie.Diers@Illinois.gov>; Strauss, Rebecca Y. <Rebecca.Strauss@Illinois.gov>; Matoesian, Charles <Charles.Matoesian@Illinois.gov>
Subject: [External] RE: PCB21-08

Hi Melanie:

Sounds good and thanks for the update. I just received emails from both you and Brian accepting the status conference meeting.

I'll report to Carol that I've requested a meeting and IEPA told me they are working on getting back to me and request a 60 day extension. Talk to you in a bit.

I look forward to working with you both.

Kristen

Kristen Laughridge Gale | Nijman Franzetti LLP
T: 312-262-5524

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From: Jarvis, Melanie <Melanie.Jarvis@Illinois.gov>
Sent: Thursday, January 15, 2026 9:42 AM
To: Kristen Gale <kg@nijmanfranzetti.com>
Cc: Navarrete, Brian <Brian.Navarrete@Illinois.gov>; Ryan, Michelle <Michelle.Ryan@Illinois.gov>; Samson, Sara B. <Sara.Samson@Illinois.gov>; Diers, Stefanie <Stefanie.Diers@Illinois.gov>; Strauss, Rebecca Y. <Rebecca.Strauss@Illinois.gov>; Matoesian, Charles <Charles.Matoesian@Illinois.gov>
Subject: PCB21-08

Good morning, Kristen. We are going to transition your adjusted standard from BOW Legal to BOL Legal. Brian Navarrete from my staff will be the lead handling the case for us. I am hoping that he will be on the status call today and then he will set up the meeting you requested. If you have any questions, please let me know. Melanie

Melanie A. Jarvis

Deputy Chief Counsel-Land Enforcement

Division of Legal Counsel

217-782-2893

melanie.jarvis@illinois.gov

Join our team: Illinois EPA Employment

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Old Ash Pond, Meredosia Power Station

PRB Design – Boron Treatment



February 3, 2026

Electronic Filing: Received, Clerk's Office 09/17/2026

Presentation Outline

- Former Meredosia Power Plant Ash Ponds
- Old Ash Pond Conceptual Cross-Section
- Groundwater Flow Direction and Elevation
- November 2025 Downgradient Boron Concentrations
- Treatability Results for In Situ Boron Remediation
- Approximate Permeable Reactive Barrier (PRB) Lateral Extent
- Projected Boron Concentrations Downgradient of Ash Pond and PRB
- PRB Vertical Installation & Target Treatment Interval
- Conclusions

Former Meredosia Power Plant Ash Ponds

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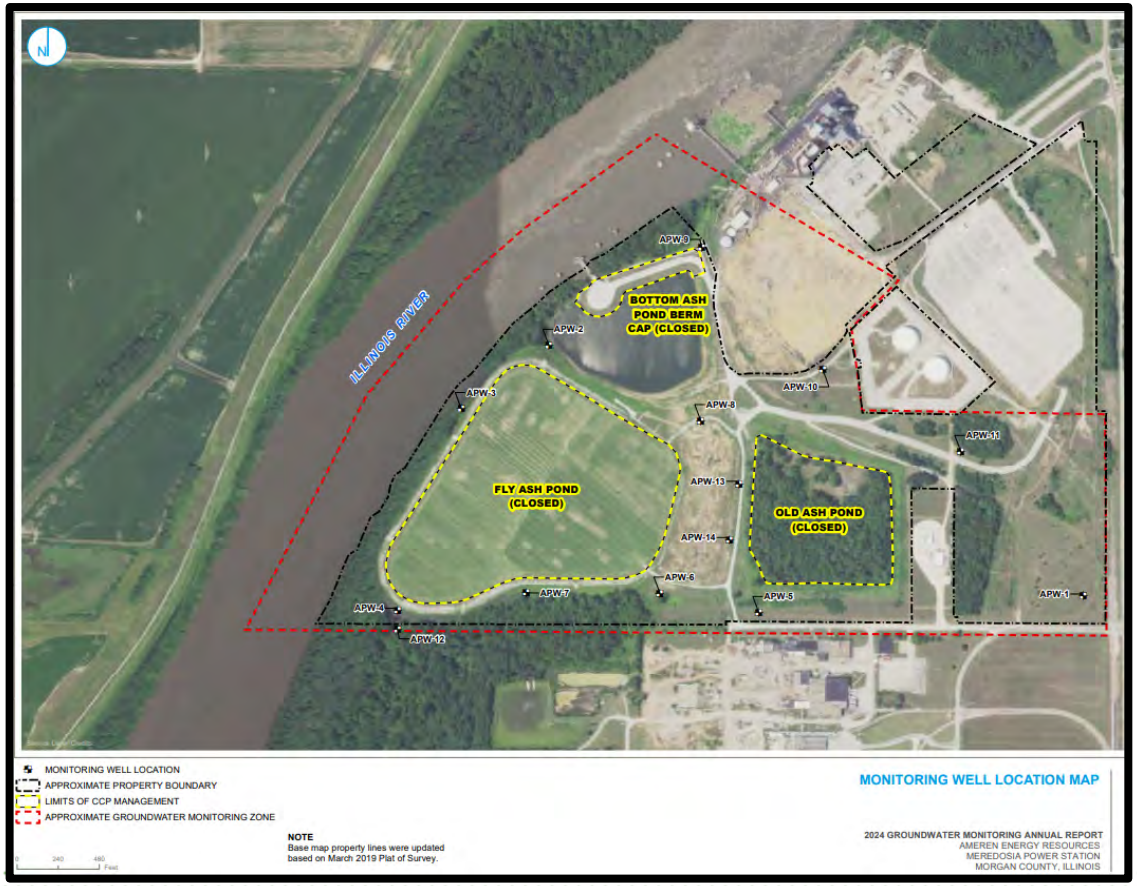
The Meredosia Power Station has three coal combustion product impoundments:

- Bottom Ash Pond
- Fly Ash Pond
- Old Ash Pond.

The Bottom Ash Pond was constructed in 1972 with a design surface area of 11 acres, a height of 24 feet, and a volume of approximately 90 acre-feet.

The Fly Ash Pond was constructed in 1968 and has a design surface area of 44.8 acres, a height of 24 feet, and a volume of approximately 500 acre-feet.

The Old Ash Pond was closed in the early 1970s. Constructed with two cells (east and west) and received fly ash until its closure. Clay and sand materials were used for the cap and range from 1-6 feet in thickness. The Old Ash Pond is approximately 15.7 acres, with ash ranging between 8-12 feet in thickness.

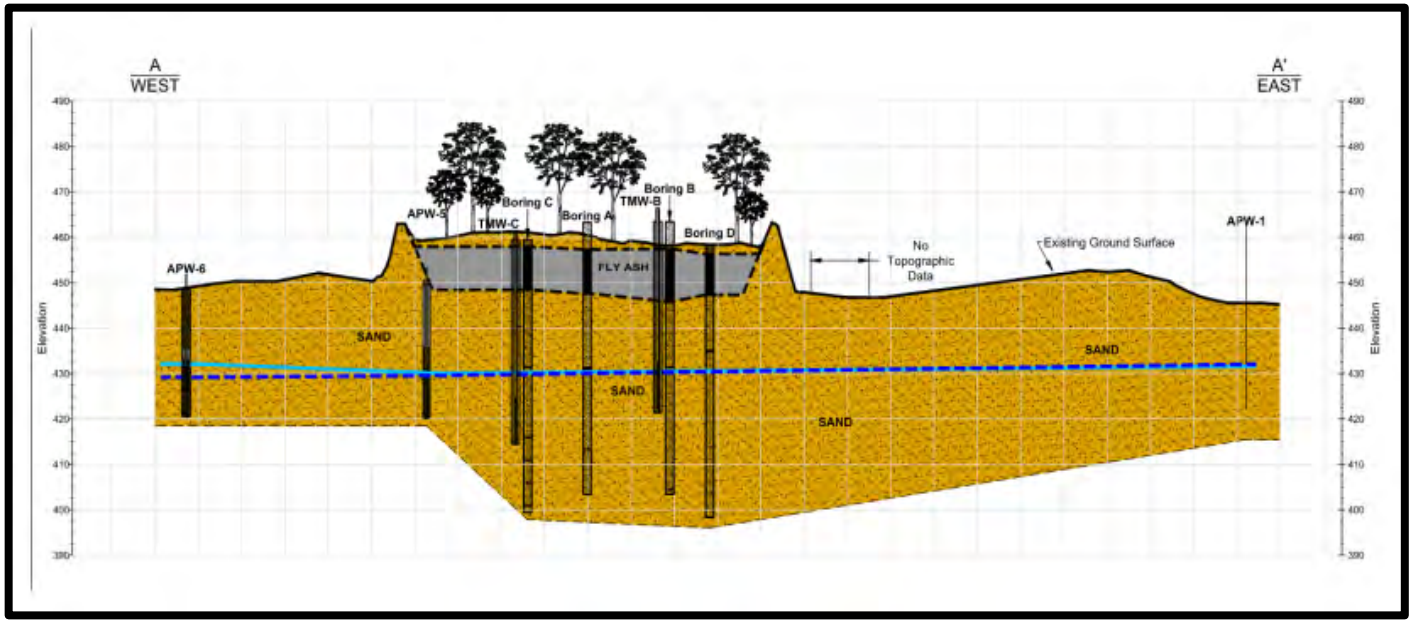


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Former Meredosia Power Plant - Old Ash Pond

The Old Ash Pond (Pond) encompasses an area of 16 acres and depth of up to 12 feet (ft). The Pond is reported to be constructed of native materials and was capped with river dredge soil during the 1970's. The cover material is vegetated with grass and trees. According to Haley & Aldrich, the ash was deposited above the seasonal high groundwater table which is **20 ft below** the natural ground surface. Underlying the Pond is fine to coarse sands.

Conceptual Cross-Section



Cross-Section developed by Geotechnology, LLC

Groundwater Flow Direction

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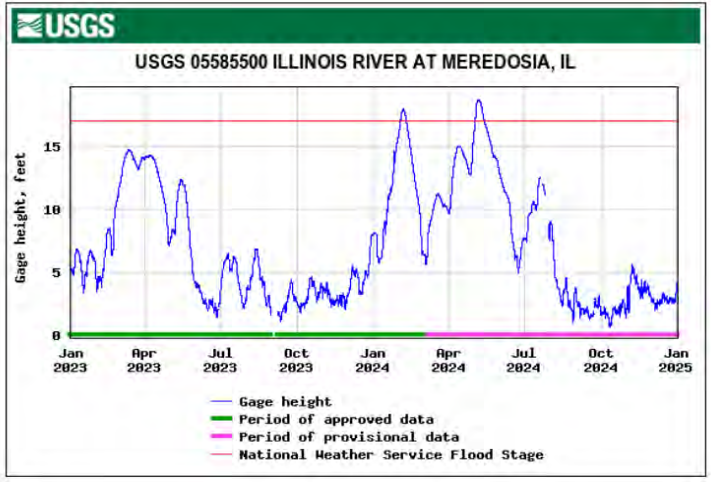
Meredosia Groundwater Flow Directions

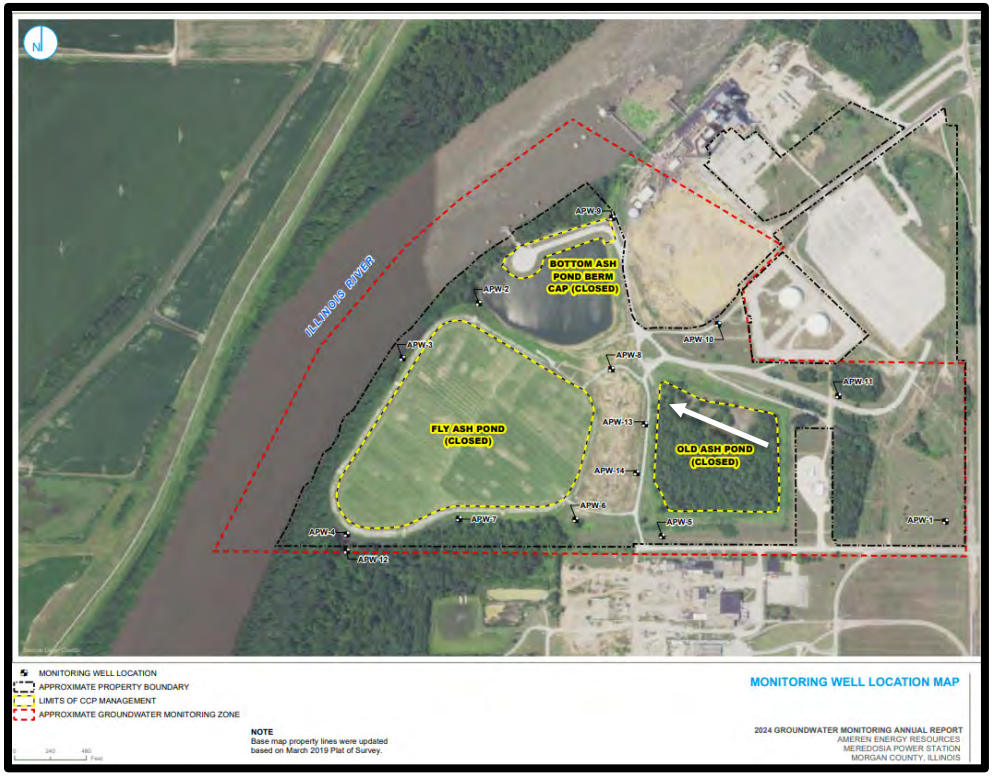
Sample Month

Quarter	2020	2021	2022	2023	2024	2025
1st	Feb	Jan	March	Feb.	March	--
2nd	April	June	June	April	June	--
3rd	July	Sep.	Aug.	Sep.	Aug.	--
4th	Dec.	Nov.	Dec.	Nov.	Nov.	Nov

Groundater Flow Direction

Quarter	2020	2021	2022	2023	2024	2025
1st	NW	NW	WNW	NW	WNW	--
2nd	NW	NW	NW	WNW	WNW	--
3rd	NW	NW	NW	NW	NW	--
4th	NW	NW*	NW	NW	W & NW	NW





Note: Quarterly groundwater contour figures provided in annual reports

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November 2025 Downgradient Boron Concentrations

Groundwater grab samples from temporary borings along a 100-foot spacing:

- Determine extent and concentration of boron impact downgradient of Old Ash Pond
- Temporary Borings TB-1, TB-2 and TB-3 exceed the regulatory boron criteria of 2.0 mg/L
- TB-4 through TB-9 had concentrations less than applicable regulatory boron criteria



Treatability Results for In Situ Boron Remediation

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Phase 1 – Screening / Proof of Concept

- Several amendments tested in batch test reactors (table at right)
  - Each amendment at 2 different dosages minimum
  - Dosages selected based on manufacturer recommendations and prior experience with similar sites
  - Boron reduction efficiencies compared to untreated control

Phase 2 – Refinement Phase with Columns

- Based on Phase 1 results - three products selected
- Columns used to simulate in situ conditions
  - Phase 1 dosages mixed with site soil
  - Groundwater flow through columns at site-specific groundwater velocity
- Column test results used to evaluate
  - Boron Reduction (adsorption capacity)
  - Residence time (contact time between gw and product)

Conclusions

- **Rembind 100x selected** for field implementation based on
  - Treatability results – boron reductions
  - Required residence time
  - Injectability and in situ application strategy

Product (Manufacturer)	Description	Boron Reduction Efficiency	Residence Time	Injectability / Implementability
Rembind 100x (Rembind)	carbon, proprietary constituents, clays; granular	✓ ✓ ✓ ✓	✓ ✓ ✓ ✓	✓ ✓ ✓ ✓
Rembind 200 (Rembind)	carbon, proprietary constituents, clays; micron-scale	✓ ✓ ✓	✓ ✓ ✓	✓ ✓ ✓ ✓
KW-2200 (Kisuma)	Mg, Al oxides	✓ ✓ ✓	✓ ✓ ✓	✓ ✓ ✓
SIR-150 (ResinTech)	Anionic resin	✓ ✓ ✓ ✓	✓ ✓ ✓ ✓	✓ ✓
AAFS50 (Delta Adsorbents)	Activated alumina (300 - 600 micron)	✓ ✓	✓ ✓	✓ ✓ ✓
ZVI (Hepure)	Micro-scale iron	✓ ✓	✓ ✓	✓ ✓ ✓ ✓

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Approximate PRB Lateral Extent Revised 100%

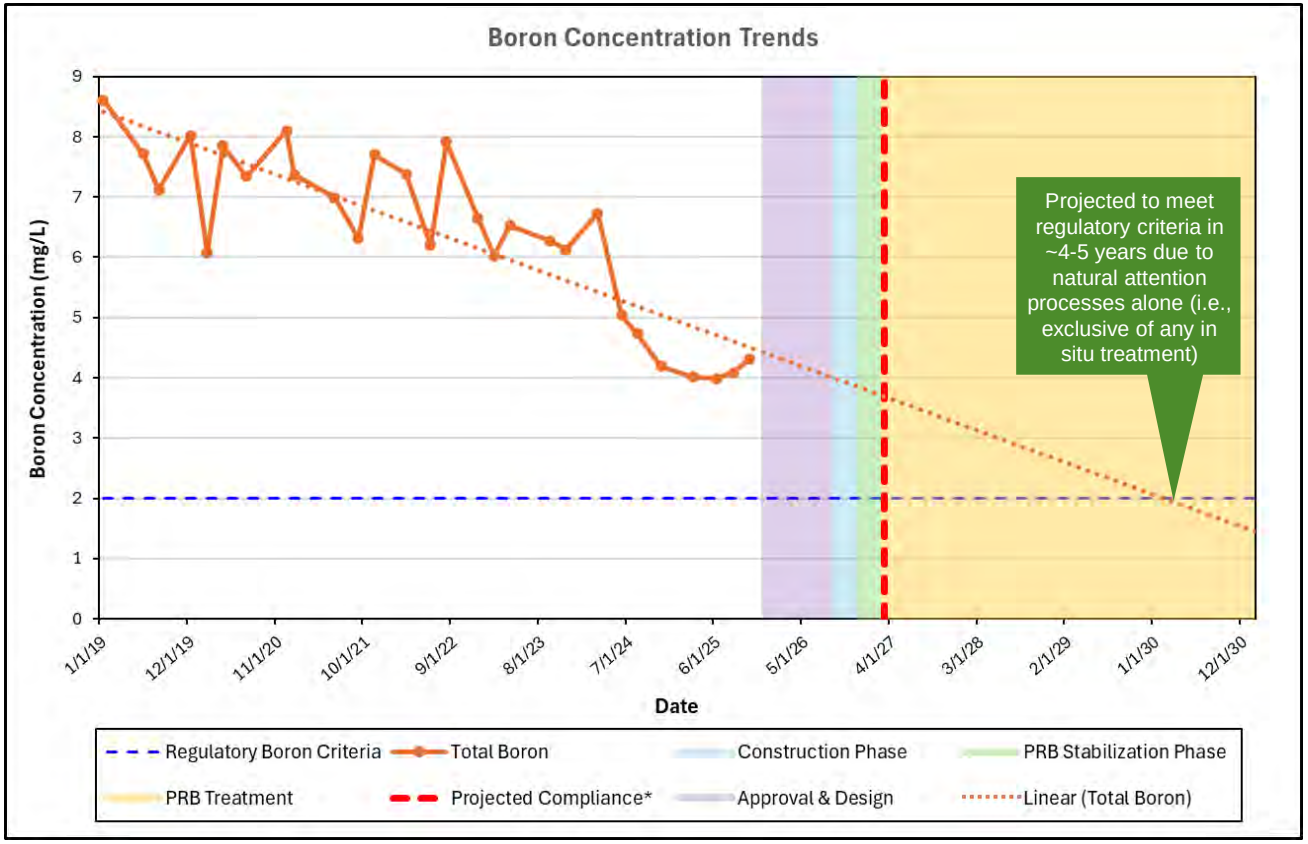
Based on typical groundwater flow direction (2020 – 2025) corresponding to temporary boring data (Nov 2025 groundwater grab samples) and monitoring well groundwater sample concentrations, the PRB (wall) is positioned to intercept groundwater as it migrates from the Old Ash Pond northwest towards the Illinois River



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Projected Boron Concentrations Downgradient of Ash Pond

Corrective Action through a downgradient PRB intercepting groundwater flow should reduce the compliance by 3+ years if implemented in late 2026.



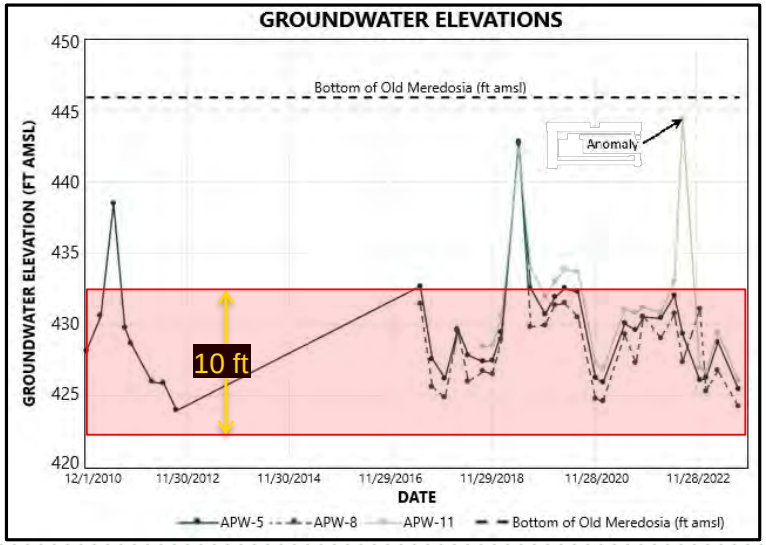
* Compliance point downgradient of PRB is under development / yet to be determined.

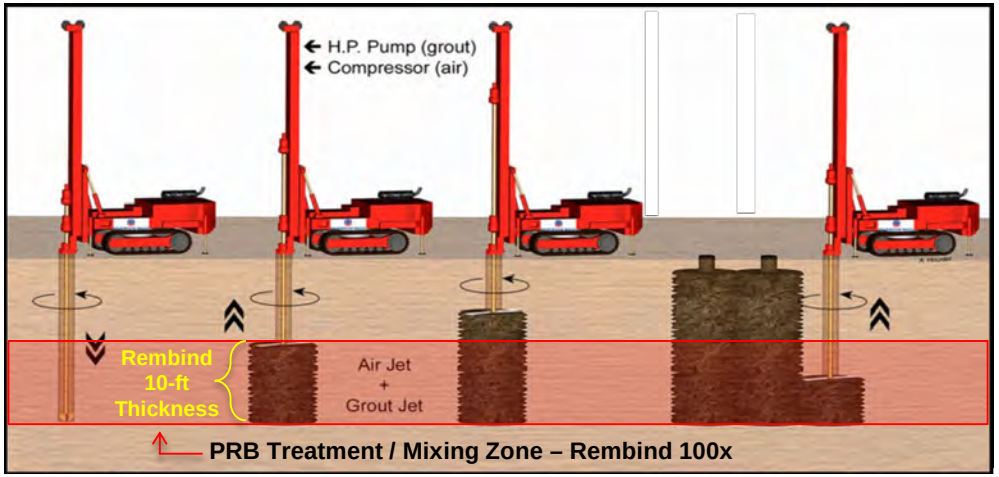
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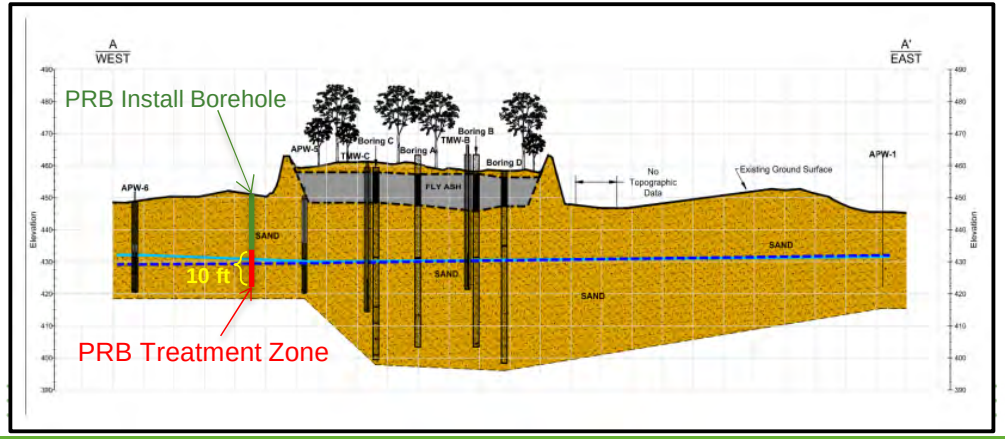
PRB Vertical Installation and Target Treatment Interval

Material mixed into a slurry to concentrations/ratios determined from the treatability study through hollow-stem/flight auger to the target zone depth utilizing an overlapping auger-hole methodology.

PRB will be installed to a target incept elevation zone of 422-432 feet above mean sea level.







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Conclusions

- Ameren has selected RemBind 100x to be installed in situ as a PRB
  - Reduction in boron concentrations determined via lab treatability results
  - Residence time
  - Implementation ability, application strategy
- PRB will be installed to depths of approximately 35 - 45 feet below ground surface
- Installation perpendicular to typical groundwater flow direction from the Old Ash Pond
- PRB length estimated approximately 470 total linear feet
- Installed via hollow-stem flight-auger and mixed in-place
- PRB treatment timeframe is anticipated to be 3.5 - 5 years post-implementation
- Natural attenuation trend projects compliance in 4 - 5 years
- Approach reduces compliance period by 3+ years



Questions and Discussion

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Reference Documents

(1) **Treatability Test Results for the Evaluation of In Situ Remediation Technologies** – Old Ash Pond, Meredosia Power Station, 800 South Washington Street, Meredosia, Illinois | October 1, 2025 | Loureiro Engineering Associates

(2) **2024 Groundwater Monitoring Annual Report** – Closed Fly Ash & Bottom Ash Ponds Former Meredosia Power Station | January 31, 2025 | Ramboll

(3) **2023 Groundwater Monitoring Annual Report** – Closed Fly Ash & Bottom Ash Ponds Former Meredosia Power Station | January 29, 2024 | Ramboll

(4) **2022 Groundwater Monitoring Annual Report** – Closed Fly Ash & Bottom Ash Ponds Former Meredosia Power Station | March 31, 2023 | Ramboll

(5) **2021 Annual Report** – Meredosia Power Station | March 25, 2022| Ramboll

(6) **2020 Annual Report** – Meredosia Power Station | March 31, 2021| Ramboll

(7) **Full-Scale Cost Estimates for In Situ Remediation** – Old Ash Pond, Meredosia Power Station, 800 South Washington Street, Meredosia, Illinois | October 24, 2025 | Loureiro Engineering Associates

(8) **Old Meredosia Update Memo (DRAFT)** | November 12, 2025 | Haley & Aldrich, Inc.

(9) **Sampling and Testing Report** – Old Ash Pond, Meredosia Power Plant, Morgan County, Illinois | September 28, 2022 | Geotechnology, LLC

(10) **Hydrogeologic Assessment Report Fly Ash Pond and Bottom Ash Pond** – Meredosia Power Station 800 South Washington Street, Meredosia, Illinois | December 13, 2016 | | Geotechnology, LLC

EXHIBIT B

Kristen Gale

From: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Sent: Thursday, May 28, 2026 11:19 AM
To: Kristen Gale
Subject: RE: PCB21-08 - Old Meredosia Preliminary Work Plan
Attachments: Meredosia Treatability Study Presentation IEPA Comments.pdf

Employee Shield
Warning: The sender Brian.Navarrete@Illinois.gov might be a spam sender.
Block as Spam Not a Spam Sender
powered by Graphus®

Hi Kristen,

Ahead of our call this afternoon, I wanted to circulate IEPA's questions and concerns about the Treatability Study.

Thanks,

Brian Navarrete

Land Enforcement Attorney

Department of Legal Counsel

217-558-3501

Brian.Navarrete@illinois.gov

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From: Kristen Gale <kg@nijmanfranzetti.com>
Sent: Tuesday, May 26, 2026 9:04 AM

To: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Subject: [External] RE: PCB21-08 - Old Meredosia Preliminary Work Plan

Hi Brian:

Thanks for checking in – we have been working on our end to make one of the days work. The best date and time is May 28 at 1:30.

Thanks

Kristen

Kristen Laughridge Gale | Nijman Franzetti LLP
T: 312-262-5524
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From: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Sent: Friday, May 22, 2026 10:43 AM
To: Kristen Gale <kg@nijmanfranzetti.com>
Subject: Re: PCB21-08 - Old Meredosia Preliminary Work Plan

Just following up on these dates.

Thanks,

Brian Navarrete

Land Enforcement Attorney

Department of Legal Counsel

217-558-3501

Brian.Navarrete@illinois.gov

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From: Navarrete, Brian
Sent: Monday, May 18, 2026 8:24 AM
To: Kristen Gale <kg@nijmanfranzetti.com>
Subject: RE: PCB21-08 - Old Meredosia Preliminary Work Plan

Hi Kristen,

I have two potential times. Tuesday May 26 at 10:30 and Thursday May 28 at 1:30.

Thanks,

Brian Navarrete

Land Enforcement Attorney

Department of Legal Counsel

217-558-3501

Brian.Navarrete@illinois.gov

Join our team: Illinois EPA Employment

From: Kristen Gale <kg@nijmanfranzetti.com>
Sent: Friday, May 15, 2026 12:09 PM
To: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Subject: [External] RE: PCB21-08 - Old Meredosia Preliminary Work Plan

Hi Brian:

Thanks for the update. Our plan is to file the Second Amended Petition the first week of June. Can we schedule a call with the Agency the last week of May to discuss your team's thoughts?

Thanks

Kristen

Kristen Laughridge Gale | Nijman Franzetti LLP
T: 312-262-5524
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From: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Sent: Friday, May 8, 2026 2:15 PM
To: Kristen Gale <kg@nijmanfranzetti.com>
Subject: RE: PCB21-08 - Old Meredosia Preliminary Work Plan

I just heard back from technical. They are expecting to be done by the end of May.

Thanks,

Brian Navarrete

Land Enforcement Attorney

Department of Legal Counsel

217-558-3501

Brian.Navarrete@illinois.gov

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From: Kristen Gale <kg@nijmanfranzetti.com>
Sent: Monday, May 4, 2026 1:24 PM
To: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Subject: [External] RE: PCB21-08 - Old Meredosia Preliminary Work Plan

Hi Brian:

Thanks for the update. In consideration of the timing we told the Hearing Officer, do you have a timeline for when we may hear back from them?

Kristen

Kristen Laughridge Gale | Nijman Franzetti LLP

T: 312-262-5524

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From: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Sent: Monday, May 4, 2026 2:23 PM
To: Kristen Gale <kg@nijmanfranzetti.com>
Subject: RE: PCB21-08 - Old Meredosia Preliminary Work Plan

Hi Kristen,

Illinois EPA technical staff are currently reviewing the preliminary work plan. I will let you know if they have any questions or comments.

Thanks,

Brian Navarrete

Land Enforcement Attorney

Department of Legal Counsel

217-558-3501

Brian.Navarrete@illinois.gov

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From: Kristen Gale <kg@nijmanfranzetti.com>
Sent: Monday, May 4, 2026 1:09 PM

To: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Subject: [External] RE: PCB21-08 - Old Meredosia Preliminary Work Plan

Hi Brian:

I understand that Illinois EPA had an opportunity to tour the Old Meredosia Site. Accordingly, I am checking in on whether you or your technical staff have any questions or comments on the preliminary Work Plan for Old Meredosia.

Thanks

Kristen

Kristen Laughridge Gale | Nijman Franzetti LLP
T: 312-262-5524
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From: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Sent: Wednesday, April 15, 2026 8:13 AM
To: Kristen Gale <kg@nijmanfranzetti.com>
Cc: Martin, Jennifer M <jmartin3@ameren.com>
Subject: RE: PCB21-08 - Old Meredosia Preliminary Work Plan

Kristen,

I appreciate you sending this my way. I have circulated it to the technical staff. I will let you know if we have any questions.

Thanks,

Brian Navarrete

Land Enforcement Attorney

Department of Legal Counsel

217-558-3501

Brian.Navarrete@illinois.gov

Join our team: Illinois EPA Employment

From: Kristen Gale <kg@nijmanfranzetti.com>
Sent: Wednesday, April 15, 2026 6:51 AM
To: Navarrete, Brian <Brian.Navarrete@Illinois.gov>
Cc: Martin, Jennifer M <jmartin3@ameren.com>
Subject: [External] PCB21-08 - Old Meredosia Preliminary Work Plan

Brian:

Attached please find the Preliminary Work Plan for the In Situ Boron Treatment for you and your colleagues' review. Please do not hesitate to reach out with any questions.

Thanks

Kristen

Kristen Laughridge Gale | Nijman Franzetti LLP

T: 312-262-5524

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Illinois Environmental Protection Agency
2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor **James Jennings**, Acting Director

Based on the materials provided to date and the information presented regarding the proposed groundwater treatment approach, the following comments consolidate several issues into a single summary consistent with prior communications. These comments are intended to identify general issues Illinois Environmental Protection Agency (Illinois EPA) expect to see addressed in any study or amended petition formally filed with the Illinois Pollution Control Board (Board).

The treatability study arises in the context of a proceeding before the Board concerning the regulatory status of the Old Meredosia ash disposal area at the Meredosia Power Station (LPC No. 1370305002). In that proceeding, Ameren requested a determination that the unit is not subject to the requirements of 35 Ill. Adm. Code Part 845 or alternatively requested an adjusted standard from certain provisions of those regulations.

In a prior Order in the proceeding, the Board granted a stay to allow the petitioner to evaluate potential groundwater treatment approaches associated with the Old Meredosia unit. The Order indicated that the purpose of the stay was to allow investigation of potential in-situ treatment technologies intended to address groundwater concentrations of coal combustion residual (CCR) related constituents while potentially minimizing disturbance to existing site conditions.

The Illinois EPA's formal position will ultimately be based on materials submitted into the Board record and any subsequent technical review. Accordingly, the comments below are intended only to identify general issues the Illinois EPA would expect to see addressed and should not be interpreted as a determination regarding the adequacy of any specific proposal.

1. Site-Specific Applicability of the Study

Any treatability study or remedy evaluation should reflect the site-specific conditions present at Old Meredosia. Based on the information provided to date, it would be helpful for the study to

clearly explain how the testing conditions reflect the physical, chemical, and hydrogeologic characteristics of the site.

For example, clarification may be useful regarding whether CCR materials from the Old Meredosia unit itself were used in the evaluation, rather than surrogate materials or literature data. Differences in CCR age, weathering, mineralogy, and leaching behavior can influence groundwater chemistry and treatment performance, and these factors may affect the applicability of testing results to site conditions.

Similarly, it may be helpful to understand how groundwater chemistry at the site, including parameters such as alkalinity, sulfate concentrations, and the presence of competing ions, was incorporated into the testing framework. Treatment performance can vary depending on these conditions and understanding how the study reflects site-specific groundwater chemistry may assist in interpreting the results.

These considerations are generally consistent with the site-specific hydrogeologic and groundwater characterization typically relied upon when evaluating groundwater conditions and potential remedial responses under 35 Ill. Adm. Code Part 845 groundwater monitoring and corrective action provisions.

2. Delineation of Groundwater Impacts

Before an effective remedial strategy can be evaluated, the nature and extent of groundwater contamination should be adequately characterized. Based on the information available to date, it may be helpful to further clarify the extent to which groundwater impacts associated with the unit have been delineated. In particular, it may be useful to confirm whether available data sufficiently define the horizontal and vertical extent of groundwater contamination downgradient of the pond. Understanding plume geometry and migration pathways is typically an important component of evaluating potential remedial approaches.

Clarification may also be useful regarding the type and representativeness of monitoring points used in the available dataset. For example, Illinois EPA may benefit from understanding whether sampling results are derived primarily from properly installed and developed monitoring wells or from other types of sampling locations. Additional monitoring points located closer to the CCR surface impoundment may also help characterize potential maximum concentrations and source conditions.

Adequate delineation of groundwater impacts may help inform evaluation of the appropriate treatment area, the potential length and configuration of a treatment system, and whether groundwater could migrate beneath or around a proposed treatment system. These considerations are generally consistent with 35 Ill. Adm. Code Part 845 Subpart F, which requires characterization of the nature and extent of releases where groundwater protection standards are exceeded.

3. Conceptual Site Model and Hydrogeology

Evaluation of groundwater treatment approaches generally benefits from a clear understanding of the site conceptual model, including subsurface stratigraphy and groundwater flow conditions.

Information provided to date suggests that the subsurface profile may generally consist of a layer of dredged river soils used as cover, CCR materials beneath the cover, and underlying sand deposits. In this context, it may be helpful for the study to further discuss how these conditions influence groundwater flow and potential treatment performance.

For example, the presence of sand underlying the CCR materials may have implications for groundwater movement beneath the unit and may influence whether groundwater could migrate beneath a treatment system. Similarly, infiltration through the existing cover may influence the rate at which groundwater interacts with CCR materials.

Understanding potential variability in groundwater flow (including changes in hydraulic gradients or possible influences from river stage) may also be useful when evaluating whether a proposed treatment system could effectively intercept groundwater migrating from the unit. Hydrogeologic characterization of this type is generally an important element of groundwater monitoring and corrective action evaluations conducted under 35 Ill. Adm. Code Part 845 Subpart F.

4. Source Control Considerations

The materials provided to date appear to focus primarily on treatment of groundwater, rather than removal or isolation of the underlying source of contamination. In evaluating potential remedies, it may therefore be helpful to consider how groundwater treatment relates to the presence of CCR materials remaining at the site. For example, it may be useful to understand whether the existing cover system effectively limits precipitation infiltration into the CCR materials, and whether additional source control measures could further reduce contaminant loading to groundwater. Consideration of how groundwater treatment interacts with ongoing source conditions may also be relevant to evaluating long-term remedy effectiveness.

Where CCR material remains in place, the regulatory framework of 35 Ill. Adm. Code Part 845 generally contemplates closure measures intended to limit infiltration and reduce the potential for continued contaminant migration. For example, 35 Ill. Adm. Code 845.710 describes closure performance objectives associated with final cover systems, and 35 Ill. Adm. Code 845.750 addresses closure requirements where CCR remains in place. Clarification of how the proposed treatment approach relates to these broader closure and source control considerations may assist in understanding the overall remedial framework.

5. Performance and Durability of Treatment

If a permeable reactive barrier or similar treatment system is proposed, it may be helpful for the study to address several issues related to treatment performance and durability. These may include the anticipated treatment duration, the expected longevity of treatment media, and the potential for treatment effectiveness to decline over time.

Information presented to date suggests that the proposed treatment system may operate over a relatively limited time period. In evaluating such an approach, it may therefore be useful to consider how the anticipated treatment duration relates to the longer-term groundwater monitoring and post-closure care timeframes that may apply under 35 Ill. Adm. Code Part 845. In addition, the treatability study materials appear to suggest that the proposed approach could allow groundwater concentrations to reach applicable standards earlier than other potential remedial scenarios. If this concept is relied upon as part of the remedy evaluation, it may be helpful to clarify the assumptions underlying those projections and how those projections relate to the broader groundwater protection standards contemplated under 35 Ill Adm. Code Part 845.

Any proposed treatment system should ultimately demonstrate the ability to address the vertical and horizontal extent of contamination and maintain performance for the duration necessary to achieve groundwater protection standards.

6. Monitoring and Demonstration of Compliance

Evaluation of any groundwater treatment approach will likely rely on an adequate monitoring network capable of demonstrating treatment effectiveness and verifying groundwater conditions over time. In this context, it may be helpful to consider whether monitoring wells are appropriately located both upgradient and downgradient of the treatment area, and whether the monitoring network would be capable of identifying potential bypass or underflow conditions. Monitoring capable of evaluating long-term trends in groundwater concentrations may also be important in demonstrating whether remediation objectives are being achieved. These types of monitoring considerations are generally consistent with the groundwater monitoring framework established in 35 Ill. Adm. Code Part 845 Subpart F, which requires monitoring sufficient to detect releases and evaluate groundwater conditions relative to groundwater protection standards.

7. Consideration of Natural Attenuation

The presentation also referenced projections suggesting that groundwater concentrations may decline to compliance levels within several years (4-5 years) through natural processes. If natural attenuation is considered as part of the overall remedy evaluation, it may be helpful to provide documentation supporting projected attenuation trends, including the assumptions and models used in developing those projections. Consideration of potential variability in groundwater conditions may also assist in evaluating the reliability of projected timelines.

8. Habitat and Environmental Considerations

Information provided to date references potential habitat or ecological considerations associated with the treatment area. While such considerations may be relevant to the implementation of potential remedies, they are distinct from the evaluation of groundwater protection standards. Accordingly, any study or amended petition may benefit from clearly distinguishing between habitat or ecological considerations and demonstration that groundwater protection standards can be achieved and maintained. No guarantees have been proposed to maintain the forest and sand prairie habitat. Since the basis of the adjusted standard is the burden being imposed on the established habitat and ecosystem, land use restrictions should be considered and memorialized.

9. Additional Data Needs

Additional information, including but not limited to additional delineation of groundwater impacts, clarification of sampling methods and monitoring locations, additional site-specific geochemical or hydrogeologic data, and discussion of how treatment systems would address the full extent of groundwater contamination, may be helpful in evaluating the feasibility of the proposed approach.

10. Treatment System Considerations

While the resin media is projected to mitigate the boron exceedances in approximately three years, a contingency plan should be discussed and benchmarks established to demonstrate that adequate progress is being made to achieving the groundwater protection standards. These benchmarks may be based off of stagnating boron concentrations over a set number of sampling quarters. Should the remediation process prove to be not as effective as predicted, additional measures should be implemented by benchmark triggers to initiate additional remediation efforts to maintain remediation schedule.

It is understood that the effectiveness of the resin reactive permeable barrier will decline over time, as the resin collects the boron. Discussion should be provided to clarify that the boron will remain contained within the resin and not become a source by leaching back out of the resin at a later date. Any possible failure points of the resin should be discussed as well as the behavior of the resin left in-situ over decades.

These comments are intended only to identify general issues the Agency would expect to see addressed in any treatability study or amended petition submitted to the Board. They should not be interpreted as a determination regarding the adequacy of any specific remedy or study.

The Agency's formal evaluation will occur after a complete study or proposal is filed into the Board record and is available for full technical review.