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 Motion to Supplement its Response, a copy of which is herewith served upon you.

Dated: September 24, 2026

AMEREN ENERGY MEDINA VALLEY COGEN, LLC

By: __/s/Kristen L. Gale _____

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true copy of the foregoing Notice of Filing and Ameren Energy Medina Valley Cogen, LLC's Motion to Supplement its Response was electronically filed on September 24, 2026 with the following:

Don Brown, Clerk of the Board
Illinois Pollution Control Board
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and that a copy was sent via e-mail on September 24, 2026 to the parties on the service list.

Dated: September 24, 2026 /s/Kristen L. Gale

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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 MOTION TO SUPPLEMENT ITS RESPONSE

Ameren Energy Medina Valley Cogen, LLC ("Ameren") requests that the Hearing Officer grant this Motion to Supplement its Response pursuant to 35 Ill. Admin. § Code 101.502(a) and states as follows:

1. On September 17, 2026, Ameren filed its Response to Illinois Environmental Protection Agency's ("Illinois EPA" or "Agency") Recommendation.

2. In its Response, Ameren cited to a Professional Engineer's conclusion that the Old Meredosia Pond does not contain "free liquids" and is not a Legacy CCR surface impoundment. *See* Ameren Response, p. 3. The Professional Engineer's written conclusion was not available by September 17, 2026, and is attached as Exhibit C.

3. Ameren requests leave to supplement its Response and include Exhibit C as an attachment.

4. Counsel for Ameren contacted Illinois EPA's counsel, who indicated they have no objection to this motion to supplement the Response.

WHEREFORE Ameren requests that the Hearing Officer grant this Motion to Supplement its Response by including Exhibit C as an attachment of Ameren's Response.

Dated: September 23, 2026

Respectfully submitted,

Ameren Energy Medina Valley Cogen, LLC, Petitioner

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

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EXHIBIT C

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September 18, 2026

Mr. Craig Giesmann, P.E., P.M.P.
Director, Environmental Services
Ameren Missouri
One Ameren Plaza, 1901 Chouteau Ave
St. Louis, MO 63103

Subject: Evaluation of Applicability of 40CFR257, amended on May 8, 2024, "CCR Legacy Rule" on Old Meredosia Meredosia Plant, Meredosia, IL

Dear Mr. Giesmann:

Geosyntec Consultants, Inc. (Geosyntec) has prepared this letter for AmerenEnergy Medina Valley Cogen, LLC (Medina Valley) to present our evaluation of whether the closed Old Meredosia[1] at the Meredosia Plant (Facility) is regulated by United States EPA's 40 CFR 257 Subpart D, the CCR Legacy Rule[2]. In 2015, Medina Valley did not include the closed surface impoundment under CCR Rule as an existing surface impoundment because was not receiving CCR and it did not contain liquids on or after October 19, 2015, the effective date of the CCR Rule.

BACKGROUND

The Facility has had three surface impoundments (Figure 1) that managed coal combustion residuals (CCRs):

- Old Meredosia
- Fly Ash Pond
- Bottom Ash Pond

Old Meredosia was a 17-acre surface impoundment that was operated from construction through 1971 and then closed in place. The cover is comprised of native materials dredged from the Illinois River and consists mainly of sand. The cover slopes gently from north to south and is vegetated with deciduous forest and shrub-scrub vegetation. No surface water ponding has been observed over many years of inspections [1]. Investigations in the pond footprint in 2022 confirmed that

[1] Also known as the "Old Ash Pond"
[2] CCR Rule was issued on April 17, 2015 and it was amended on May 8, 2024 (Legacy Rule) with corrections on November 8, 2024.

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there was no perched water within the CCR. Old Meredosia was replaced by the Fly Ash Pond and Bottom Ash Pond in 1968 and the 1970s, respectively.

The Fly Ash Pond was commissioned in 1968 and closed in place in 2018 under Illinois Environmental Protection Agency (IEPA) oversight. The bottom of ash in the Fly Ash Pond is approximately el. 428 ft [1]. Investigations in 2025 have indicated that the groundwater table is significantly below the base of the CCR and there are no free liquids within the CCR [2]. Therefore, the Fly Ash Pond is not a legacy surface impoundment.

The Bottom Ash Pond was commissioned in 1972. It was constructed to similar criteria as the Fly Ash Pond with a bottom of ash of approximately el. 426 ft. Most of the pond was closed by removal and incorporation into the Fly Ash Pond in 2018 under IEPA oversight [1]. The Bottom Ash Pond in the excavation area does not contain CCR nor free liquids and is not a legacy surface impoundment. A portion of the edge of the Bottom Ash Pond, in the shape of a berm along the Illinois River, is covered with a synthetic cover (ClosureTurf®). This may be considered closure using an alternate cover system under 40 CFR 257.102(d)(3)(ii). Closure photos and design drawings indicate the CCR was removed to the toe of the berm, at approximately el. 426 ft [1]. The surface of the berm is used as a road to access infrastructure along the Illinois River. The road is paved with a 24-inch-thick, IDOT Type A aggregate [3].

The Fly Ash Pond is adjacent to the Bottom Ash Pond and was investigated in 2025, and free liquids were not identified. Because the Fly Ash Pond and Bottom Ash Pond had similar bottom elevations and the Fly Ash Pond does not contain free liquids, it is expected that the berm does not contain free liquids. Therefore, the berm is not a legacy surface impoundment.

EVALUATION

To affirm whether Old Meredosia is regulated under the CCR Legacy Rule, the following information is considered:

- For a former surface impoundment (“ash pond”) to be regulated as a legacy surface impoundment it would have to:
  - Be at an Inactive Facility, which means the facility was not generating electricity on October 19, 2015;
  - Have another legacy surface impoundment at the Inactive Facility; and
  - Contain CCR and free liquids on October 19, 2015.

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The following responses are provided:

- The Facility was an Inactive Facility on October 19, 2015.
- The Bottom Ash and Fly Ash ponds were closed and do not contain free liquids and are not legacy surface impoundments.
- Old Meredosia did not contain free liquids on October 19, 2015.

Therefore, the Inactive Facility does not have an inactive surface impoundment, and the Old Meredosia contains CCR but not free liquids, and therefore, Old Meredosia is not regulated by the CCR Legacy Rule.

Sincerely,

Thomas W. Ward, PE (KY, MO, IL, IA, AL, OH, IN, TN)
Project Manager

John Seymour, P.E. (IL)
Senior Principal

REFERENCES

[1] Haley & Aldrich, Petition for Adjusted Standard for Old Meredosia, Meredosia, Illinois, Cleveland, OH: Haley & Aldrich, 2023.

[2] Reitz & Jens, Inc., Legacy CCR Surface Imoundment Appicability Report- Field Investigation for Meredosia Energy Center (EC) Fly Ash Pond, St. Louis, MO, 2025.

[3] Geotechnology and CDG Engineers, Medina Valley Cogen, Ash Pond Closure General Plans, Details, Meredosia Power Station, Drawing C-303, St Louis, MO, 2019.