CWLP Timeline of Activities Related to CCR Surface Impoundments

Date	Program	Event/Comments
2008-12-22		TVA/Kingston failure
2009-05-15		IEPA-BOW sends letter to CWLP regarding Hydrogeologic Assessment Plan
2009-07-14		CWLP submits plan to IEPA and proposes to add ash pond wells and sample
2010-07-28		USEPA request for access to conduct ash pond assessments - Kleinfelder
2010-08-13		USEPA/Kleinfelder conductes site assessment / ash pond inspection of the Dallman and Lakeside ash ponds
2010-09-22		Stabilize, Inc. provides results of 35 IAC 620 Ash Pond Assessment; CWLP submits hydrological assessment and well sampling data to IEPA
2011-05-10		USEPA/Kleinfelder provides site assessment of the Dallman and Lakeside ash ponds final report / inspection final report
2011-06-27		USEPA sends letter of recommendations to CWLP concerning USEPA/Kleinfelder report
2011-08-03		IEPA reviews June 2010 groundwater data and requests a meeting
2011-08-08		CWLP provides response letter to USEPA/Kleinfelder report; provides an action plan
2011-10-06		IDNR inspects Dallman and Lakeside ash ponds
2011-10-19		IEPA responds to 9/7/11 meeting and requests backgrounds to be developed
2011-10-26		IDNR Dallman and Lakeside inspection response letter; letter states ash ponds are low hazards and well maintained
2011-11-18		Andrews provides Groundwater Monitoring Program for impoundments proposed; AP1, AP2, AP3, AP4, AP5, AW3
2011-12-09		IEPA approves the proposed groundwater monitoring program for impoundments
2012-05-30		Andrews submits boring logs, well reports and data for AP1, AP2 and AP3 to IEPA
2010-05 through 2013-08		CWLP submits 14 quarters of groundwater data to IEPA
2013-06-21		Andrews provides background groundwater concentrations / statistical backgrounds for AP1, AP2, AP3, AP4, AP5, AW3
2013-08-13		USEPA sends final letter concerning USEPA/Kleinfelder report and future evaluations
2014-02-20		IEPA-BOW issues CWLP a VN for groundwater quality standard exceedances
2014-04-02		CWLP proposes CCA to conduct investigations to IEPA
2014-04-11		IEPA acknowledges receipt of CCA and proposes a 4/22/14 meeting with CWLP



CWLP Timeline of Activities Related to CCR Surface Impoundments

Date	Program	Event/Comments
2014-04-22		CWLP meets with IEPA on VN
2014-05-12		CWLP submits a proposed CCA to IEPA
2014-05-29		IEPA-BOW issues letter rejecting CCA
2015-04-17	257	USEPA 257 CCR rule finalized
2015-05-28	257	CWLP uploads 257 fugitive dust program on CCR website
2015-10-19	257	USEPA effective date of 40 CFR 257 Subpart D
2016-01-15	257	CWLP uploaded Annual Inspection report for CCR Landfill and CCR Surface Impoundments
2016-06-21		Springfield City Council establishes Environmental Regulatory Initiatives and Rebate Fund to fund surface impoundment closure
2016-10-17	257	CWLP and Andrews completes/uploads location restrictions, closure and post-closure plans, history of construction, liner status, hazard potential classification, structural stability, safety factor, inflow design flood control, closure and post-closure documents
2017-10-01	257	Andrews establishes 257 GMP for surface impoundments
2017-10-13	257	CWLP uploads GMP, monitoring system certifications, and statistical method certifications for 257 web site
2017-10-17	257	CWLP uploads CCR Landfill and Surface Impoundments groundwater monitoring system and statistical method certifications for 257 web site
2017-12-15	257	CWLP uploaded 257 Annual Fugitive Dust Control Report
2018-01-23	257	CWLP completes Annual GW Monitoring and Corrective Action report for 2017 under 257
2018-01-31	257	CWLP uploads Annual Groundwater Monitoring and Corrective Action Reports for Dallman and Lakeside CCR Surface Impoundments and Landfill
2018-02-05	257	Andrews provides and CWLP uploads notification of 257 Assessment Monitoring Program
2018-02-28	257	CWLP uploaded 257 Assessment Monitoring Program notification
2018-04-01	257	Andrews provides revised 257 GMP via installation of RW3
2018-07-11	257	Andrews established GWPS for Surface Impoundments / CWLP established Groundwater Protection Standards
2018-10-08	257	CWLP provides notification of statistically significant increase (SSL) for 257
2018-11-16	257	CWLP uploaded CCR Surface Impoundment Location Restrictions Demonstration and annual inspection for Dallman/Lakeside CCR Surface Impoundments and Landfill

CWLP Timeline of Activities Related to CCR Surface Impoundments

Date	Program	Event/Comments
2018-12-17	257	CWLP uploaded Annual Fugitive Dust Control Report and CCR Surface Impoundments Notification of Statistically Significant Increase
2019-01-30	257	Andrews completes Annual GW Monitoring and Corrective Action Report for 2018
2019-01-31	257	CWLP uploaded annual inspections for Dallman/Lakeside CCR Surface Impoundments and CCR Landfill, plus Annual Groundwater Monitoring and Corrective Action Reports
2019-04-05	257	CWLP provides notification / initiation of Assessment of Corrective Measures
2019-05-06	257	CWLP uploaded Notification of Intent to Comply with Alternative Closure Requirements and Assessment of Corrective Measures Extension
2019-05 through 2019-07	257	Andrews/CWLP performed Assessment Investigation for well RW-3
2019-08-05	257	CWLP uploaded Completion of Corrective Measures
2019-12-04	257	CWLP uploaded Annual Fugitive Dust Control Report
2020-01-30	257	Andrews completes Annual GW Monitoring and Corrective Action Report for 2019
2020-01-31	257	CWLP placed Annual Groundwater Monitoring and Corrective Action Report and annual inspection for Dallman/Lakeside CCR Surface Impoundments in operating record
2020-10-30		Last day of coal combustion in Unit 32
2020-10-31		Last day of coal combustion in Unit 31
2020-12-31		Dallman Units 31 and 32 cease operation
2021-01-25	257	Andrews completes Annual GW Monitoring and Corrective Action Report for 2020
2021-02-23		CWLP begins installation of monitoring wells AP8, AP9, AP10, AP11, AP12, AP13, AP14
2021-02-26		CWLP completes installation of monitoring wells AP8, AP9, AP10, AP11, AP12, AP13, AP14
2021-06-20		Last day of coal combustion in Unit 33
2021-10-21	845	35 IAC 845 effective; CWLP provides Inflow Design Plan, Hazard Potential Classification, Safety Factor Assessment, Structural Stability Assessment and Post-Closure Plan to IEPA and 845 web site
2021-10-25	257	Andrews completes Annual GW Monitoring and Corrective Action Report for 2020 for 257
2021-10-28	845	CWLP provides IEPA Initial Operating Permit Application per 845
2021-12-02		CWLP holds two public meetings for 845 Closure Alternatives Analysis and Assessment of Corrective Measures
2022-01-25	257	Andrews completes Annual GW Monitoring and Corrective Action Report for 2021

CWLP Timeline of Activities Related to CCR Surface Impoundments

Date	Program	Event/Comments
2022-01-27	845	Andrews provides Annual Consolidated Report to IEPA for 845
2022-02-01	845	Andrews provides IEPA Closure Construction Permit Application per 845
2022-04-27	257	USEPA/CTI 257 Inspection of Dallman and Lakeside Ash Ponds
2022-05-04	257	CWLP receives request for information from USEPA
2022-09-15		Dallman Ash Pond ceases receipt of all materials
2022-11-28	257	CWLP receives NOV for operational requirements of CCR Surface Impoundments from USEPA
2022-12-21	257	CWLP meets with USEPA to discuss NOV
2023-01-12		CWLP provides written interim response to USEPA NOV
2023-01-25	257	Andrews completes Annual GW Monitoring and Corrective Action Report for 2022
2023-01-31	845	Andrews provides IEPA Annual Consolidated Report per 845
2023-03-14		CWLP and USEPA participate in technical discussions and settlement discussions March 14 and 15, 2023
2023-03-30		CWLP receives initial proposed Injunctive Reflief from USEPA for NOV
2023-05-09		CWLP receives final proposed Injunctive Reflief from USEPA for NOV
2023-05-24	257	CWLP provides Notification of SSL for 257 for January 2023 sampling event
2023-09-01		New limesludge basins became operational
2023-09-06		Lakeside Ash Pond ceases receipt of all materials
2023-10-04		CWLP recieves NOV from USEPA regarding closure and post-closure requirements of CCR Surface Impoundments
2024-01-25	257	Andrews completes Annual GW Monitoring and Corrective Action Report for 2023
2024-01-31	845	Andrews provides Annual Consolidated Report to IEPA per 845
2024-03-01		Dallman Unit 33 officially retired
2024-03-07	257	Andrews updates 257 GMP
2024-03-28	257	Andrews provides updated geotechnical investigation report, liquefaction analysis, safety factor assessment to USEPA for 257
2024-09-09	845	CWLP provides response to IEPA Permit Review Comments, Hydrogeologic Report, Groundwater Monitoring Program and Statistical Procedures
2024-10-10	257	USEPA provides CWLP Notice of Intent to File Proposed Consent Agreement
2024-10-30		CWLP provides Supplemental Response to IEPA Permit Review Comments

CWLP Timeline of Activities Related to CCR Surface Impoundments

Date	Program	Event/Comments
2024-10-30	845	Andrews updates Appendix III and Appendix IV background and establishes GWPS for arsenic using 8 events between 7/7/23 and 8/12/24
2024-10-30	257	Andrews updates Appendix III and Appendix IV background and establishes GWPS for arsenic using 8 events between 7/7/23 and 8/12/24 for 257 CAFO
2025-01-14	257	Effective date of CAFO with USEPA
2025-01-23		CWLP submits NPDES Permit Mod Application for dewater Dallman and Lakeside Ash Pond
2025-01-29	845	Andrews provides IEPA Annual Consolidated Report per 845
2025-01-31	257	Andrews provides Annual GW Monitoring and CA Report
2025-02-13	257	Andrews updates GW monitoring and analysis procedures for USEPA per 257 CAFO; incorporates AW-1, AP-8, AP-10, AP14 and G120 into GMP
2025-02-25	257	Andrews completes Annual GW Monitoring and Corrective Action Report for 2024
2025-06-13	257	Andrews provides USEPA Nature and Extent Report for 257 CAFO
2025-06-13	257	Hanson provides ACM per 257 CAFO
2025-09-23	257	Andrews provides USEPA comprehensive Flow Path Report
2025-09-23	257	Hanson updates Closure and Post-closure plans per 257 CAFO
2025-09-23	257	Andrews provides update Nature and Extent Report
2025-11-19	257	Hanson/Andrews provides USEPA updates to ACM and Nature and Extent Reports per 257 CAFO
2026-01-29	257	Andrews completes Annual GW Monitoring and Corrective Action Report for 2025
2026-01-29	845	Andrews provides IEPA Annual Consolidated Report per 845
2026-02-25		IEPA BOW issues NPDES Permit for dewatering of Dallman and Lakeside Ash Ponds
2026-04-01	257	Andrews provides USEPA updated Inflow Design, Periodic Structural Stability and Safety Factor Assessment comments