



Coal Combustion Residual Surface Impoundment Permitting Program

Application Form CCR 1: General Provisions

This form must be submitted for all construction and operating permit applications. Two sets of the applications must be submitted. Items which are self-explanatory are omitted in these instructions. Signatures on at least one (1) submittal must be original.

The owner or operator must place in the facility's operating record all permit applications submitted to the Agency and all permits issued under 35 Ill. Adm. Code 845 as required by 35 Ill. Adm. Code 845.800(d)(1).

DESCRIPTION OF CCR PERMIT APPLICATIONS FORMS

The application forms for Coal Combustion Residual (CCR) Surface Impoundment Permits include the following:

Form CCR 1 – General Provisions (included in this packet)

Form CCR 2 – Forms Based on Activity Type (Not included in this packet):

- 2CN New Construction
- 2CA Corrective Action Construction
- 2CC Closure Construction
- 2N Initial Operating Permit for a New CCR Surface Impoundment and Any Lateral Expansion of a CCR Surface Impoundment
- 2R Renewal Operating Permit
- 2E Initial Operating Permit for Existing or Inactive CCR Surface Impoundments that have not completed an Agency-approved closure before July 30, 2021
- 2OE Initial Operating Permit for Existing or Inactive CCR Surface Impoundments that have completed an Agency-approved closure before July 30, 2021
- 2OI Initial Operating Permit for Inactive Closed CCR Surface Impoundments

DETERMINING APPLICABILITY

| Applicants <u>not</u> required to Submit a Permit Application | |
|---|--|
| <p>1. Was the CCR generated at a facility that is <u>not</u> part of electric utility or independent power producer, such as manufacturing facilities, universities, and hospitals?</p> <p>If yes, STOP. Do not complete Form CCR 1. You do not need a CCR Surface Impoundment Permit under 35 Ill. Adm. Code 845.</p> | <p>2. Is the CCR placement at active or abandoned underground or surface coal mines?</p> <p>If yes, STOP. Do not complete Form CCR 1. You do not need a CCR Surface Impoundment Permit under 35 Ill. Adm. Code 845.</p> |
| <p>3. Was the CCR generated primarily from the combustion of fuels other than coal for the purpose of generating electricity?</p> <p>If No, proceed to question 4.</p> <p>If Yes, answer the following question below:</p> <p>Did the fuel burned consist of less than 50% coal on a total heat input or mass input basis, whichever results in the greater mass feed rate of coal?</p> <p>If yes, STOP. Do not complete Form CCR 1. You do not need a CCR Surface Impoundment Permit under 35 Ill. Adm. Code 845.</p> | <p>4. Are you a <u>landfill</u> that receives CCR?</p> <p>If yes, STOP. Do not complete Form CCR 1. You do not need a CCR Surface Impoundment Permit under 35 Ill. Adm. Code 845.</p> |

| Applicants Required to Submit a Permit Application | | | | | |
|---|---|---------------------|---|------|---------------------|
| <p>1. Are you an owner and/or operator of new and existing CCR surface impoundments, including any lateral expansions of CCR surface impoundments that dispose of or otherwise engage in solid waste management of CCR generated from the combustion of coal at electric utilities and independent power producers?</p> | <p>2. Are you an owner and/or operator of an inactive CCR surface impoundment at active and inactive electric utilities or independent power producers?</p> | | | | |
| <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%; padding: 5px;">Yes➔</td> <td style="padding: 5px;">Complete Form CCR 1</td> </tr> </table> | Yes➔ | Complete Form CCR 1 | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%; padding: 5px;">Yes➔</td> <td style="padding: 5px;">Complete Form CCR 1</td> </tr> </table> | Yes➔ | Complete Form CCR 1 |
| Yes➔ | Complete Form CCR 1 | | | | |
| Yes➔ | Complete Form CCR 1 | | | | |

ACTIVITIES REQUIRING A CCR SURFACE IMPOUNDMENT PERMIT (35 Ill. Adm. Code Subpart B)

| | |
|--|--|
| 1. Are you building a new CCR surface impoundment, lateral expansion or a CCR surface impoundment, or retrofitting an existing CCR surface impoundment? | 2. Are you performing corrective action under Subpart F of the Rule? |
| Yes → Complete Forms CCR 1 and 2CN | Yes → Complete Forms CCR 1 and 2CA |
| 3. Are you closing a CCR surface impoundment under Subpart G of the Rule? | 4. Are you submitting an Initial Operating Permit for a new CCR surface impoundment and any lateral expansion of a CCR surface impoundment? |
| Yes → Complete Forms CCR 1 and 2CC | Yes → Complete Forms CCR 1 and 2N |
| 5. Are you renewing an Operating Permit? | 6. Are you submitting an Initial Operating Permit for an existing or inactive CCR surface impoundment that has not completed an Agency-approved closure before July 30, 2021? |
| Yes → Complete Forms CCR 1 and 2R | Yes → Complete Forms CCR 1 and 2E |
| 7. Are you submitting an Initial Operating Permit for existing or inactive CCR surface impoundment that has completed an Agency-approved closure before July 30, 2021, <u>and</u> where the impoundment <u>is not</u> an inactive closed CCR surface impoundment? | 8. Are you submitting an Initial Operating Permit for an inactive closed surface impoundment? An inactive closed surface impoundment is an inactive CCR surface impoundment that completed closure before October 19, 2015 with an Agency-approved closure plan. |
| Yes → Complete Forms CCR 1 and 2OE | Yes → Complete Forms CCR 1 and 2OI |

CONTENTS OF FORM CCR 1 PACKAGE

- Form CCR 1 – General Instructions
- Form CCR 1 – Line-by-line Instructions
- Form CCR 1 - Application

FORM CCR 1 – GENERAL INSTRUCTIONS

Who Must Apply for a CCR Surface Impoundment Permit?

Owners and operators of new and existing CCR surface impoundments, including any lateral expansions of CCR surface impoundments that dispose of or otherwise engage in solid waste management of CCR generated from the combustion of coal at electric utilities and independent power producers.

What other forms must be completed?

Form CCR 1 collects general information only. You must also complete a more detailed application based upon your proposed activity as follows:

- If your facility is building a new CCR surface impoundment, lateral expansion of a CCR surface impoundment, or retrofit of an existing CCR surface impoundment; you must also complete Form CCR 2CN for each new CCR surface impoundment, lateral expansion of a CCR surface impoundment, or retrofit of an existing CCR surface impoundment.
- If your facility will be performing any corrective action under Subpart F of 35 Ill. Adm. Code 845, you must also complete Form CCR 2CA for each CCR surface impoundment undergoing corrective action.

- If your facility is closing a CCR surface impoundment under Subpart G of 35 Ill. Adm. Code 845, you must also complete Form CCR 2CC for each CCR surface impoundment you will be closing.
- If your facility is applying for an initial operating permit for a new CCR surface impoundment and any lateral expansion of a CCR surface impoundment, you must also complete Form CCR 2N for each new CCR surface impoundment and any lateral expansion of a CCR surface impoundment.
- If your facility is renewing an operating permit, you must also complete Form CCR 2R for each CCR surface impoundment subject to the renewal.
- If your facility comprises an existing or inactive CCR surface impoundment that has not completed an Agency-approved closure before July 30, 2021; you must also complete Form CCR 2E for each existing or inactive CCR surface impoundment that has not completed an Agency-approved closure before July 30, 2021.
- If your facility comprises existing or inactive CCR surface impoundment that has completed an Agency-approved closure before July 30, 2021, and where the impoundment is not an inactive closed CCR surface impoundment; you must also complete Form CCR 2OE for each existing or inactive surface impoundment that has completed an Agency-approved closure before July 30, 2021.
- If your facility comprises an inactive closed CCR surface impoundment, you must complete Form CCR 2OI for each inactive closed CCR surface impoundment. An inactive closed CCR surface impoundment is an inactive CCR surface impoundment that completed closure before October 19, 2015 with an Agency-approved closure plan.

Exhibit 1-1. Filing Dates for CCR Surface Impoundments Permit Applications

| Permit Application | When to File |
|---|--|
| CCR 2R – Renewal Operating Permit | At least 180 days before the expiration of the existing permit unless the Agency has granted a waiver. |
| CCR 2E – Initial Operating Permit for Existing or Inactive CCR Surface Impoundments that have not completed an Agency-approved closure before July 30, 2021. | Must be submitted by October 31, 2021. |
| CCR 2OE – Initial Operating Permit for Existing or Inactive CCR Surface Impoundments that have completed an Agency-approved closure before July 30, 2021, <u>and</u> where the impoundment <u>is not</u> an inactive closed CCR surface impoundment. | Must be submitted by October 31, 2021. |
| CCR 2OI – Initial Operating Permit for Inactive Closed CCR surface impoundments. | Must be submitted by October 31, 2021. |

FORM 1 – LINE-BY-LINE INSTRUCTIONS

Section 1: Facility, Operator, and Owner information

Item 1.1 Enter the facility’s official or legal name. Do not use a colloquial name.

Item 1.2 Provide your Illinois EPA CCR Surface Impoundment permit number if you have an existing facility. If your facility is new (i.e., not yet constructed), write or type “New Facility.” If your facility is existing, but you are filing an initial permit, write or type “Initial Permit.”

Item 1.3 Give the name (first and last), title, work telephone number, and e-mail address of the person who is thoroughly

familiar with the operation of the facility and with the facts reported in this application. The IEPA will contact the person listed if they have questions on the material submitted.

Item 1.4 Give the complete mailing address of the office to which the IEPA should send correspondence.

Item 1.5 Give the address or location of the facility identified under Item 3.1. If the facility lacks a street name or route number, give the most accurate, alternative geographic information (e.g., section number or quarter section number from county records or “at intersection of routes 425 and 22”). Also provide the county name, county code (if known), city or town, state, and zip code.

Item 1.6 Give the legal name of the person, firm, public organization, or other entity that operates the facility described in this application. This may or may not be the same as the facility’s name. The operator of the facility is the legal entity that controls the facility’s operation rather than the plant or site manager. Do not use a colloquial name.

Item 1.7 Give the name (first and last), title, work telephone number, and e-mail address of the person who is thoroughly familiar with the operation of the facility and with the facts reported in this application. The IEPA will contact the person listed if they have questions on the material submitted.

Item 1.8 Enter the address of the Owner/Operator.

Section 2: Legal Description

Item 2.1 Provide the legal description of the facility boundary.

Section 3: Publicly Accessible Internet Site Requirement

Item 3.1 Enter the web address.

Item 3.2 Select yes, to indicate that the website is titled, “Illinois CCR Rule Compliance Data and Information.”

Section 4: Impoundment identification

Item 4.1 List all the Impoundment Identification numbers for your facility and check the corresponding box to indicate that you have attached a written description for each impoundment.

Section 5: Checklist and Certification

Item 5.1 Review the checklist provided. In Column 1, mark the sections of Form CCR1 that you have completed and are submitting with your application. In Column 2, indicate for each section whether you are submitting attachments.

Item 5.2 Certification Statement: The IEPA provides for severe penalties for submitting false information in this application form. 415 ILCS 5/44(a) provides that, “Except as otherwise provided in this Section, it shall be a Class A misdemeanor to violate this Act or regulations thereunder, or any permit or term or condition thereof, or knowingly to submit any false information under this Act or regulations adopted thereunder, or under any permit or term or condition thereof. A court may, in addition to any other penalty herein imposed, order a person convicted of any violation of this Act to perform community service for not less than 100 hours and not more than 300 hours if community service is available in the jurisdiction. It shall be the duty of all State and local law-enforcement officers to enforce such Act and regulations, and all such officers shall have authority to issue citations for such violations.”

All permit applications must be signed by the owner, operator, or a duly authorized agent of the operator. 35 Ill. Adm. Code 845.210(b)(2)

An application submitted by a corporation must be signed by a principal executive officer of at least the level of vice president, or his or her duly authorized representative, if that representative is responsible for the overall operation of the facility described in the application form. In the case of a partnership or a sole proprietorship, the application must be signed by a general partner or the proprietor, respectively. In the case of a publicly owned facility, the application must be signed by either the principal executive officer, ranking elected official, or other duly authorized employee. 35 Ill. Adm. Code 845.210(b)(3)

This form must be typewritten or printed legibly. This form may be completed manually or online using Adobe Reader, a copy of it saved locally, printed, and signed before it is submitted to:

Illinois Environmental Protection Agency
DWPC – Permits MC #15
Attn: Part 845 Coal Combustion Residual Rule Submittal
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276



**Illinois Environmental Protection Agency
CCR Surface Impoundment Permit Application
Form CCR 1 – General Provisions**

Bureau of Water ID Number:

For IEPA Use Only

CCR Permit Number:

Facility Name:

SECTION 1: FACILITY, OPERATOR, AND OWNER INFORMATION (35 Ill. Adm. Code 845.210(b))

| | | | | |
|--|------------------------|--|------------------------|--------------|
| Facility, Operator, and Owner Information | 1.1 | Facility Name | | |
| | | | | |
| | 1.2 | Illinois EPA CCR Permit Number (if applicable) | | |
| | | | | |
| | 1.3 | Facility Contact Information | | |
| | | Name (first and last) | Title | Phone Number |
| | | Email address | | |
| | | | | |
| | 1.4 | Facility Mailing Address | | |
| | | Street or P.O. box | | |
| | | City or town | State | Zip Code |
| | | | | |
| | 1.5 | Facility Location | | |
| | | Street, route number, or other specific identifier | | |
| | | County name | County code (if known) | |
| | City or town | State | Zip Code | |
| | | | | |
| 1.6 | Name of Owner/Operator | | | |
| | | | | |

| | | | | |
|--|--------------|---|------------------------------|--------------|
| Facility, Operator, and Owner Info | 1.7 | Owner/Operator Contact Information | | |
| | | Name (first and last) | Title | Phone Number |
| | | Email address | | |
| | 1.8 | Owner/Operator Mailing Address | | |
| | | Street or P.O. box | | |
| | City or town | State | Zip Code | |
| SECTION 2: LEGAL DESCRIPTION (35 Ill. Adm. Code 845.210(c)) | | | | |
| Legal Description | 2.1 | Legal Description of the facility boundary | | |
| | | | | |
| SECTION 3: PUBLICLY ACCESSIBLE INTERNET SITE REQUIREMENTS (35 Ill. Adm. Code 845.810) | | | | |
| Internet Site | 3.1 | Web Address(es) to publicly accessible internet site(s) (CCR website) | | |
| | | | | |
| | 3.2 | Is/are the website(s) titled "Illinois CCR Rule Compliance Data and Information" | | |
| | | Yes | No | |
| SECTION 4: IMPOUNDMENT IDENTIFICATION | | | | |
| Impoundment Identification | 4.1 | List all the impoundment identification numbers for your facility and check the corresponding box to indicate that you have attached a written description for each impoundment. | | |
| | | | Attached written description | |
| | | | Attached written description | |
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| | | | Attached written description |
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| | | | Attached written description |

SECTION 5: CHECKLIST AND CERTIFICATION STATEMENT

| | | | | |
|--|-----|---|--|-----------------|
| Checklist and Certification Statement | 5.1 | In Column 1 below, mark the sections of Form 1 that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing. | | |
| | | Column 1 | | Column 2 |
| | | Section 1: Facility, Operator, and Owner Information | | w/attachments |
| | | Section 2: Legal Description | | w/attachments |
| | | Section 3: Publicly Accessible Internet Site Requirement | | w/attachments |
| | | Section 4: Impoundment Identification | | w/attachments |
| | 5.2 | Certification Statement | | |
| | | I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. | | |
| | | Name (print or type first and last name) of Owner/Operator | | Official Title |
| | | Signature | | Date Signed |

ATTACHMENT 2.1
Legal Description and Plant Survey

Technical Memorandum
CCR Residual Surface Impoundment Permit Application
Former Wood River Power Station, Alton, IL

Date: October 29, 2021
Attachment: IEPA Form CCR 1
Section: 2 – Legal Description (35 IAC 845.210(c))
Item No.: 2.1 – Legal Description of the facility boundary

NOTES

This attachment describes the items required under Section 2, Item 2.1.

Item 2.1 requires the submission of the legal description of the facility boundary. The legal description provided here was obtained from the ALTA/ACSM Land Title Survey (Policy Number 1284-540001537-BE) prepared by the Chicago Title Insurance Company. The legal description obtained from this report is presented as an attachment to this Technical Memorandum (TM). Additionally, the facility boundary survey map¹ is attached to this TM.

¹ IngenAE, *Wood River Property Exhibit, Drawing No. 1*, December 11, 2017.

LEGAL DESCRIPTION

The following is the legal description of the entire facility boundary encompassing both the East Ash Pond and the West Ash Pond complex.

All that part of the Northeast Quarter of fractional Section 30 lying Northeasterly of the middle thread of the Mississippi River:

All that part of the Northwest Quarter of fractional Section 29 lying Northeasterly of the middle thread of the Mississippi River and West of a line described as beginning at the North line of the said Northeast Quarter at a point 1268 feet East of the Northwest corner thereof; thence South 16 degrees 12 minutes West in the middle thread of the Mississippi River.

That part of the Southwest Quarter of Section 20 described as follow, to wit: Beginning at the Quarter Section corner between Sections 19 and 20; thence East on the Quarter Section line to the center of Wood River; thence Southerly and down the center of the old Channel to Wood River and following the meanderings thereof to the Quarter Section line dividing the Southeast and Southwest Quarter of said Section 20; thence South on the said Quarter Section line to the Quarter Section corner between Section 20 and 29; thence West on the Section line between Sections 20 and 29, 4.055 links more or less, to the place of beginning containing 125.75 acres, more or less; excepting therefrom a tract of land conveyed by Lena Feldwisch, a widow, et al to Harry L. Meyer and Caroline K Meyer, husband and wife by Warranty Deed dated February 25, 1944 and recorded in Book 900 Page 453 of the Recorder's Office of Madison County, Illinois.

All that part of the West Half of fractional Section 19 described as follows, to-wit: Beginning at a concrete monument at the center of said Fractional Section 19; thence North 0 degrees 55 minutes West along the East line of said half section a distance of 1637.08 feet to a point which is approximately 1067 feet Southerly from the North line of said Fractional Section 19; thence South 89 degrees 59 minutes West parallel to the North line of said Fractional Section a distance of 1592.0 feet to a point in the East property line of the Alton Boxboard Company being also on the Southerly prolongation of what is known as the Power House Line where the center line of a sanitary sewer easement to the City of Alton, Illinois intersects the same; thence South 1 degree 00 minutes East 1171.32 feet along said line to its intersection with the Northeasterly right-of-way of Federal Aid Route #155 as conveyed by American Smelting and Refining Company to the State of Illinois for the use of its Department of Public Works and Building by warranty deed dated March 25, 1969 and recorded in Book 2622 at Page 569 of the Records in the Recorder's Office of Madison County, Illinois; thence Southeasterly along said right-of-way line a distance of 1814.45 feet to the North-South center line of said fractional Section 19; thence North 0 degrees 55 minutes West along said line 384.28 feet to the point of beginning

EXCEPTING THEREFROM that part conveyed to Wood River Drainage and Levee District by Quit Claim Deed recorded September 16, 1986 in book 3385 page 1729, being more particularly described as follows:

That part of Section 19, Township 5 North, Range 9 West of the Third Principal Meridian, Madison County, Illinois described as beginning at a concrete monument set at the center of said Section 19; thence South 0 degrees 51 minutes East along the North and South center line of said Section being also the West line of the City of Alton Pumping Station Tract a distance of 150.00 feet to the Southwest corner thereof; thence South 89 degrees 56 minutes East along the South line of said tract a distance of 82.00 feet to the West line of the City of Alton roadway Easement; thence South 0 degrees 51 minutes East along said West line a distance of 95.00 feet; thence South 89 degrees 56 minutes East a distance of 45.00 feet; thence South 0 degrees 51 minutes East a distance of 150.00 feet to the intersection with the Northeasterly right of way line of Illinois Federal Aid Route 155; thence North 62 degrees 03 minutes West along said right of way line a distance of 144.91 feet to the intersection with the North and South center line of said Section 19; thence South 0 degrees 51 minutes East along said line a distance of 57.06 feet to the Northeasterly right of way line of said Federal Aid Route #155; thence North 62 degrees 03 minutes West along said right of way line a distance of 1814.45 feet the West property line of Illinois

Power Company; thence North 0 degrees 53 minutes West along said property line a distance of 775.18 feet; thence South 42 degrees 38 minutes East a distance of 502.17 feet; thence South 53 degrees 39 minutes East a distance of 357.18 feet; thence South 62 degrees 03 minutes East a distance of 1263.70 feet; thence South 0 degrees 04 minutes West a distance of 68.02 feet to the North line of said pumping station tract; thence North 89 degrees 56 minutes West along said North line a distance of 135.00 feet to the point of beginning.

That part of Northeast Quarter of Section 19 described as follows, to-wit: Commencing at a stone at the Northeast corner of said Quarter section; thence South 89 degrees 59 minutes West a distance of 1082.65 feet; thence South 0 degrees 55 minutes East a distance of 262.92 feet to the intersection with the Southwesterly right-of-way line of the Illinois Terminal Railroad and point of beginning; thence North 69 degrees 01 minutes West along said right-of-way line a distance of 71.13 feet; thence South 0 degrees 55 minutes East along the East line of a tract of land described in a Special Warranty Deed dated June 25, 1969 and recorded in Book 2631 Page 505 of the Records in the Recorder's Office of Madison County, Illinois, a distance of 781.17 feet; thence South 60 degrees 52 minutes West along the Southeasterly line of a tract of land described in the aforesaid Special Warranty Deed, a distance of 1716.40 feet to the North-South center line of said Fractional Section 19; thence South 0 degrees 55 minutes East along said center line 849.86 feet to the center of said Fractional Section 19; thence East along the South line of said Northeast Quarter; a distance of 1576.8 feet; thence North 0 degrees 55 minutes West along the East line of a tract conveyed by Quit Claim Deed dated May 26, 1924 and recorded in Book 532 Page 320 of the Records in the Recorder's Office of Madison County, Illinois, a distance of 2441.1 feet to the point of beginning;

That part of the Northeast Quarter of Fractional Section 19 described as follows, to-wit: Beginning 10 feet South of the Northeast corner of Section 19; thence South along section line between Section 19 and 20, a distance of 40.80 chains to the Southeast corner of the Northeast Quarter of said Section; thence West on Quarter Section line 16.41 chains; thence North parallel with the East line of said quarter section 40.80 chains; thence East parallel with the North line of said quarter section and 10 feet south thereof 16.41 chain to the place of beginning; excepting so much thereof as is included in the right-of-way of the St. Louis, Chicago and St. Paul Railroad Company, now the Alton and Eastern Railroad and the Illinois Terminal Railroad right-of-way; also except therefrom a tract of land conveyed by Katherine E Feldwisch, et al to Thomas W. Gregory, Trustee by Warranty Deed dated August 8, 1926 and recorded in Book 579 Page 380 of the Recorder's Office of Madison County, Illinois; Also except therefrom a tract of land conveyed by Katherine E Feldwisch, a widow and others to Alton Light & Power Company, an Illinois Corporation by Warranty Deed dated August 13, 1930 and recorded in Book 649 Page 415 of the Recorder's Office of Madison County, Illinois; Also excepting therefrom a tract of land conveyed by Lena Feldwisch, a widow, et al to Western Cartridge Company, a Delaware Corporation, by Warranty Deed dated October 24, 1941, and recorded in Book 841 Page 250 of the Recorder's Office of Madison County, Illinois;

That part of the Northwest Quarter of Section 20 described as follows, to-wit: Bounded on the West by the Section line between Sections 19 and 20 on the East by the center of the old channel of Wood River, on the North by the section line and on the South by a fence as it formerly stood on the North side of a lane on the 22nd day of July 1864, the Southwest corner of said tract being at a stone set at the West end of the said lane on the Section line 12.50 chains more or less, North from the Southwest corner of said Quarter sections; from which is in an Easterly direction on the line of the fence, on the Northside of said lane, at a distance of 11.00 chains, more or less, another stone is set on said South boundary, which boundary line runs from said last named stone with the direction of the line between the two stones to the center of the old Channel of Wood River, excepting therefrom a tract of land conveyed by Leonard Elble and wife to Charles A Caldwell by Warranty Deed dated January 29, 1917 and recorded in Book 423 Page 29 of the Recorder's Office of Madison County, Illinois; excepting the right-of-way of the St. Louis, Chicago and St. Paul Railroad Company and the Illinois Terminal Railroad right-of-way;

That part of the Northwest Quarter of Section 20 described as beginning at Southwest corner of said Northwest Quarter; thence North along the section line between Section 19 and 20, 12.20 chains, more or less to a stone set at the Southwest corner of a tract of land conveyed by Richard M Benbow, et al to

Jacob Serring by deed recorded in Book 82 Page 60 and Book 80 and 331 in the Recorder's Office of Madison County, Illinois, being also the Southwest corner of the tract of land conveyed by Lena Feldwisch et al to Illinois Power Company by deed dated October 10, 1946 and recorded October 15, 1946 in the Recorder's Office of Madison County, Illinois in Deed Book 994 Page 453; thence running a little North of East along and with the direction of the South boundary line of said Serring land (being also the South boundary line of the land conveyed by Lena Feldwisch et al to Illinois Power Company as aforesaid) 12.50 chains, more or less to the center of the old channel of Wood River; thence running down said stream with the meanders of the old channel of Wood River a distance of 80 feet, more or less to a point 896.88 feet East of the West line of said Section 20, being the Northwest corner of a tract of land conveyed by Anna Barbara Elble, et al to Illinois Power Company by deed dated November 4, 1949, recorded November 10, 1949 in the Recorder's Office of Madison County, Illinois in Deed Book 1162 Page 585; thence South 0 degrees 55 minutes East parallel with the West line of said Section 20, a distance of 859 feet, more or less to a point in the South line of said Quarter section being the Southwest corner of said tract of land conveyed to Illinois Power Company by Anna Barbara Elble, et al as foresaid; thence West along the South line of said Quarter Section 896.88 feet, more or less to the place of beginning.

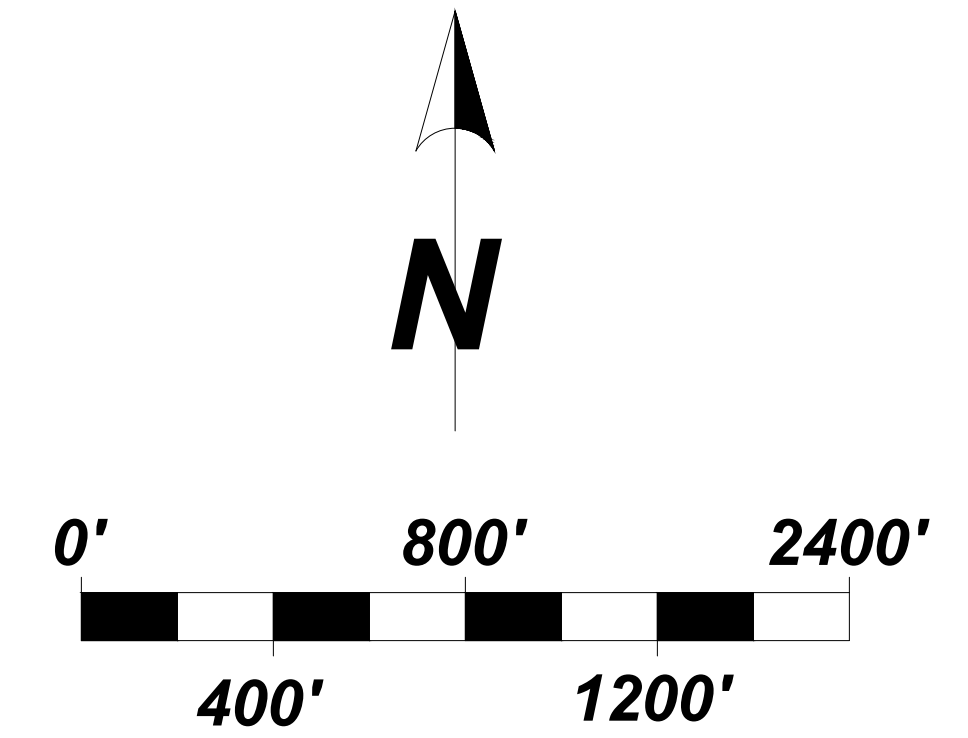
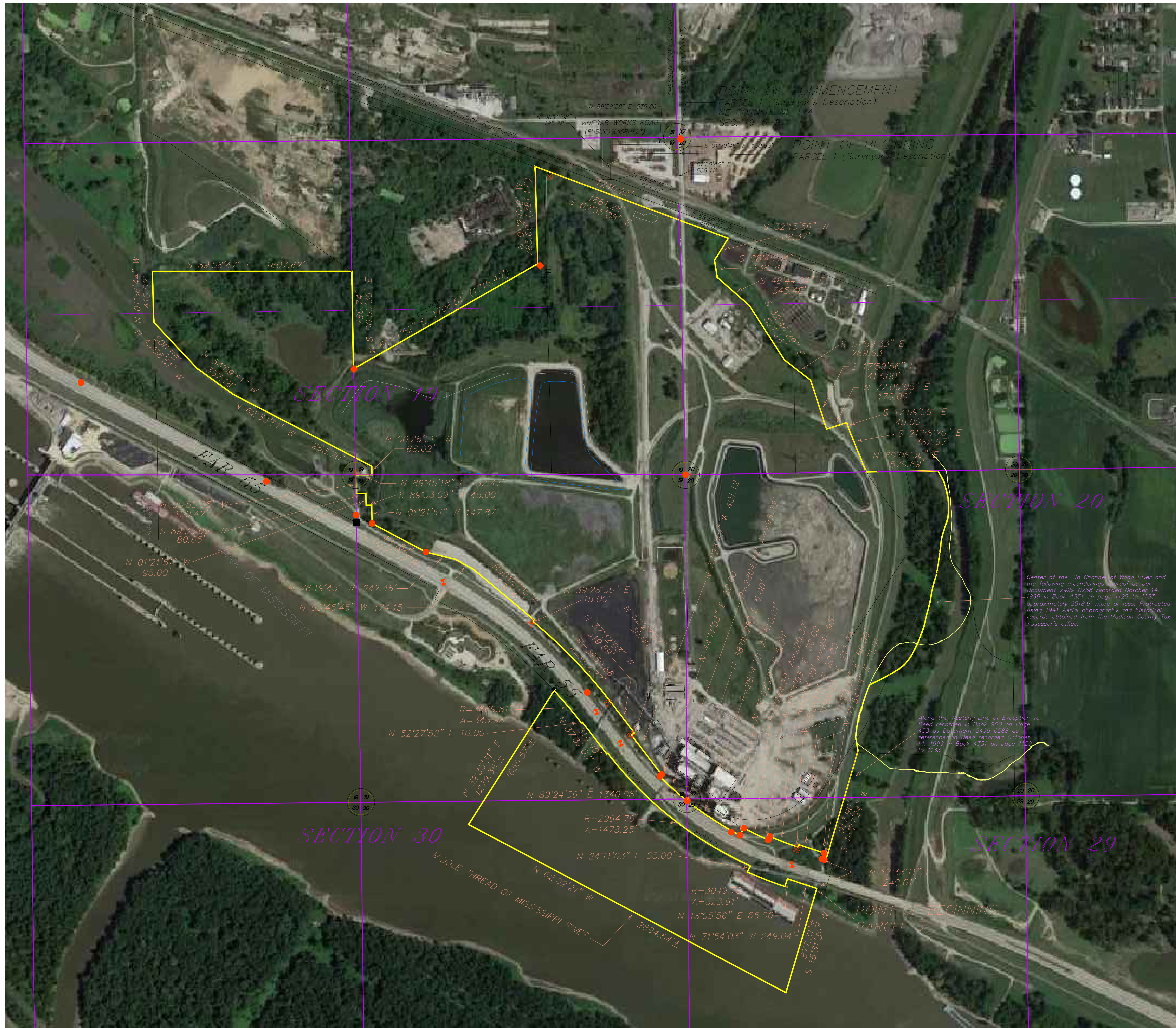
That part of the Northwest Quarter of Section 20 described as commencing at a point in the South line of said Quarter section a distance of 896.88 feet North 89 degrees 7 minutes East from a stone set in the Southwest corner of said quarter section; thence North 89 degrees 7 minutes East along the South line of said Quarter section a distance of 570.62 feet to the Westerly right-of-way line of the Wood River Drainage and Levee District; thence North 21 degrees 53 minutes West along the Westerly right-of-way line a distance of 379.38 feet; thence North 17 degrees 52 minutes West a distance of 45 feet; thence South 72 degrees 8 minutes West a distance of 170 feet; thence North 17 degrees 52 minutes West a distance of 413 feet, more or less, to the center of old Channel of Wood River; thence Northwesterly along said center of old Channel of Wood river a distance of 180 feet, more or less, to a point 896.88 feet East of the West Line of said Section 20; thence South 0 degrees 55 minutes East parallel with the West line of said Section 20, a distance of 859 feet, more or less to the point of beginning;

All the above described real estate located in Town ship 5 North, Range 9 West of the Third Principal Meridian, Madison County, Illinois.

EXCEPT THAT PART THEREOF conveyed to Green Investment Group, Inc., an Illinois Corporation by Special Warranty Deed recorded October 23, 2007 as Document 2008R49573, more particularly described as follows:

A tract of land being part of the Northeast Quarter of Section 19, Town ship 5 North, Range 9 West of the Third Principal Meridian, City of Alton, Madison County, Illinois, described as follows:

Commencing at the Northeast corner of said Section 19; thence along the East line of said Section 19, South 01 degree 00 minutes 25 seconds east (assumed bearing) 150.00 feet to the point of beginning of the herein described tract; thence continuing along said East line South 01 degree 00 minutes 25 seconds east 407.25 feet to the Northerly right of way line of the Norfolk and Western Railway Company; thence along said Northerly right of way line North 69 degrees 17 minutes 07 seconds West 580.10 feet to an old concrete monument found marking the Southeast corner of a tract of land conveyed to Thomas W. Gregory, trustee as recorded in Deed Book 579 on page 380, of the Madison County records; thence along the East line of said Thomas W. Gregory trustee tract North 00 degrees 15 minutes 49 seconds West 195.88 feet to the Southwest corner of a tract of land conveyed to Western Cartridge Company as recorded in deed Book 841 page 250 of the Madison County Records; thence along the South line of said Western Cartridge Company tract North 89 degrees 20 minutes 45 seconds east 536.38 feet to the point of beginning. Situated in Madison County, Illinois



Legend

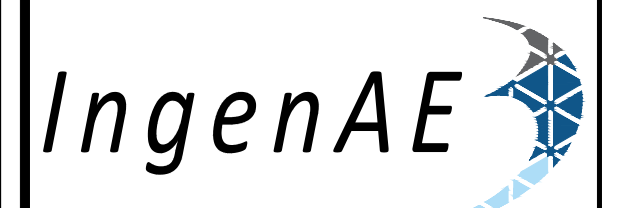
- Found Iron Monument
- Found Stone
- ⊠ Found Right-of-Way Monument

Notes

The East Property line protracted based upon material provided by client, material provided by the United States Corps of Engineers, researched and documentation and obtained from the Madison County Recorder's and Tax Assessor's records. It appears the current channel alignment is based upon work performed by the Corps of Engineers to execute plans relating to the Wood River Drainage and Levee District dated August 6, 1947. The "old" channel as depicted hereon as called out in the current deed is based on the prior alignment of the channel as underlayed from the 1941 Aerial Photography provided by the United States Corps of Engineers which was matched the property boundary alignment as protracted on the current Madison County Tax Assessor's original map. The remaining configuration of said East Line is as per previous ALTA surveys provided by the client.

The South Line of the property boundary protracted hereon is based upon material provided by the Illinois Department of Transportation on an Existing Right-of-Way Survey the field work which was completed in October, 2015 and staked in May, 2016.

The remaining configuration of the property boundary as protracted hereon is as per previous ALTA surveys provided by the client.



514 Earth City Plaza
 Earth City, MO 63045
 www.ingenae.com

| Submissions / Revisions: | Date: |
|--------------------------|-------|
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Project Name & Location:
Wood River Power Station

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Drawing Name:
Wood River

Property Exhibit

| | |
|---------------------|------------------|
| Date: 12-11-17 | Project No. |
| Type: | Drawing No. |
| Drawn By: MTZ | 1 OF 1 |
| Approved By: | |
| Scale: 1" = 400' | |

ATTACHMENT 4.1
Description of West Ash Pond System

Technical Memorandum
CCR Residual Surface Impoundment Permit Application
Former Wood River Power Station, Alton, IL

Date: October 29, 2021
Attachment: IEPA Form CCR 1
Section: 4 – Impoundment Identification
Item No.: 4.1 – Impoundment identification document

NOTES

This attachment describes the items required under Section 4, Item 4.1.

Item 4.1 requires the submission of the IEPA Impoundment Identification Number as well as a written description of the impoundment. CTI Development LLC has yet to receive any official Impoundment Numbers for the three CCR units (Pond 1, Pond 2E, and Pond 2W which comprise the West Ash Pond System) issued by IEPA. The West Ash Pond System has received its renewed NPDES Permit (No. IL0000701) but no other Impoundment Identification Numbers.

The written description of the West Ash Pond System is attached to this Technical Memorandum (TM), including a site map showing the location of the complex. The written description was obtained from the Stantec Consulting Services, Inc. *Emergency Action Plan for Primary East Ash Pond and the West Ash Pond System at Wood River Power Station, Revision No. 1*, dated June, 15, 2017. A copy of this report is available on the federal CCR website (<https://ccrhavana.com/>) and the Illinois CCR website (<https://illinois.ccrhavana.com/>).

Description of West Ash Pond System

The former Wood River Power Station consists of the Primary East Ash Pond (PEAP) and the West Ash Pond System. The West Ash Pond System is a series of impoundments located west of the former power generating station. The West Ash Pond 1 (inactive) was used to store and dispose bottom ash with bottom ash mined for beneficial reuse continuing into 2016. The West Ash Pond 2W (inactive) was used to store and dispose of bottom ash and fly ash. The West Ash Pond 2E (inactive) was used to store and dispose of bottom ash and fly ash (no CCR received on or after October 14, 2015) and is being used to clarify non-CCR plant wastewaters and CCR contact stormwater prior to discharge in accordance with the facility's NPDES permit.

Dimensions of the three CCR units including storage capacity are presented in Table 6-1, below. Table 6 was obtained from the Emergency Action Plan¹.

Table 6-1 Station Impoundment (Primary East Ash Pond and West Ash Pond System)

| Feature/Parameter | West Ash Pond System | | | |
|--|---|-----------------------------|-----------------------------|---|
| | Primary East Ash Pond | West Ash Pond No. 1 | West Ash Pond No. 2W | West Ash Pond No. 2E |
| Maximum Embankment Height | 33 ft. ⁽⁴⁾ | ~ 25 ft. ⁽³⁾ | ~ 20 ft. ⁽³⁾ | ~ 20 ft. ⁽³⁾ |
| Length of Dam | ~2100 ft. ⁽³⁾ | ~1500 ft. ⁽³⁾ | ~1700 ft. ⁽³⁾ | ~1100 ft. ⁽³⁾ |
| Crest Width | 20 ft. ⁽⁴⁾ | ~ 15 ft. ⁽³⁾ | 15.0 ft. ⁽²⁾ | 16.0 ft. ⁽¹⁾ |
| Crest Elevation | 453 ft. ⁽⁴⁾ | ~ 445 ft. ⁽³⁾ | 427.0 ft. ⁽²⁾ | 432.0 ft. ⁽¹⁾ |
| Reservoir Area at Top of Dam | ~ 58 acres ⁽³⁾ | ~ 33.5 acres ⁽³⁾ | ~ 33.7 acres ⁽³⁾ | ~ 19 acres ⁽⁵⁾ |
| Storage Capacity at Top of Dam | 435 acre-ft. ⁽⁵⁾ | 435 acre-ft. | | 120 acre-ft. ⁽⁵⁾ |
| Primary Spillway Type | Concrete outfall structure w/ 3 inlet pipes and open top ⁽⁴⁾ | None | None | 24-Inch Ductile Iron Riser, 24-Inch HDPE Barrel |
| Primary Spillway Crest Elevation | 450 ft. ⁽⁴⁾ | Not Applicable | Not Applicable | 428.0 ft. ⁽¹⁾ |
| Storage Capacity at Primary Spillway Elevation | 422.5 acre-ft. ⁽⁴⁾ | Not Applicable | Not Applicable | 108 acre-ft. |
| Reservoir Area at Normal Water Surface Elevation | 14 acres | Not Applicable | Not Applicable | 6 acres |
| Auxiliary Spillway Type | None ⁽⁴⁾ | None | None | None |
| Auxiliary Spillway Crest Elevation | Not Applicable ⁽⁴⁾ | Not Applicable | Not Applicable | Not Applicable |


Notes:

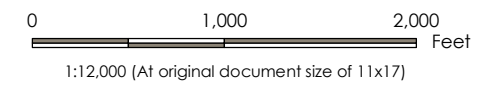
- 1) Drawings E-WDR1-C141 to -C155 (Proposed Pond #2 is West Ash Pond No. 2E). Specifically drawing E-WDR1-C147.
- 2) Drawings E-WDR1-C1 to -C10 are the record drawings for West Ash Pond No. 2W. Specifically drawing E-WDR1-C2.
- 3) 2015 Topographic Survey, Weaver Consultants Group.
- 4) "Wood River Power Station, Alton, Illinois, East Ash Impoundment Dam, IDNR Dam Safety Program, Emergency Action Plan, IDNR Permit No. DS2011079, Dam ID No. IL50536" Dynegy Midwest Generation, L.L.C. Revised March, 2015
- 5) "Coal Combustion Waste Impoundment Dam Assessment Report, Site 19 Wood River Power Station, Dynegy Midwest Generation, Inc. Alton, Illinois", Dewberry & Davis L.L.C., June 2009.

Attached to this TM is a USGS topographic map showing the locations of both the Primary East Ash Pond the West Ash Pond System locations.

¹ Stantec Consulting Services, Inc., *Emergency Action Plan, Revision No. 1*, June 15, 2017.



Legend
 CCR Surface Impoundment Boundary



Project Location: 175666013
 Latitude: 38.863714 Prepared by EC on 2017-03-08
 Longitude: -90.134158 Technical Review by TS on 2017-03-29
 Madison County, Illinois Independent Review by MM on 2017-03-23

Client/Project
 Wood River Power Station
 Emergency Action Plan

Figure No.

1-2

Title

CCR Impoundments

St. Louis - 175666013 - Appendix A - Wood River Overview.mxd

Notes
 1. Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere
 2. Basemap Source: USDA-FSA-APFO Aerial Photography Field Office, Illinois State Geological Survey
 3. Impoundment Boundaries Provided by Client (Dated 9/9/2015)

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