



# ATON

September 10, 2021

Mr. Charles Klumb  
Project Manager  
Commercial Liability Partners, LLC  
2275 Cassens Drive, Suite 118  
Fenton, Missouri 63026

**Re: Proposal to Address Part 845 Standards for the Coal Combustion Residuals in Surface Impoundments for the CTI Development/former Wood River Power Station**

Dear Mr. Klumb:

ATON, LLC is pleased to present this proposal to CLP for preparing and submitting of the Initial Operating Permit (IOP) applications for the four CCR units at the former Wood River Power Station in Wood River, Illinois to meet the recently enacted Title 35 IAC 845 – *Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments* regulations. The documentation necessary to complete the IOP application will largely borrow from existing documents prepared by other consultants who previously worked at the Wood River Power Station. However, many of the requirements will need annotated responses or updated data to meet the new regulations and complete the IOP application by the regulatory deadline of October 31, 2021.

### **Scope of Services**

Based on the recently adopted CCR regulations by the Illinois Environmental Protection Agency (IEPA), the West ash Pond Complex and East Ash Pond will require completion of the following IEPA forms:

1. CCR Form 1
2. CCR Form 2CC
3. CCR Form 2E
4. CCR Form 2OE

There are many similar data entries in these four (4) forms, but enough differences to specifically identify the efforts to complete these forms. The following summary tasks are required to address these new regulations and complete the forms:

2275 Cassens Drive | Suite 118  
Fenton, MO 63026  
p | 636.349.0202  
atonenv.com

Task 1: Review available documentation to determine whether these previously prepared documents are sufficient to meet the new regulations.

Task 2: Develop annotated responses or updated data to meet the new regulations for the following reports:

- Hydrogeologic Site Characterization.
- Groundwater Monitoring Program.
- Sampling and Analysis Plans.
- Statistical Analysis Plan.
- Hydrological and Hydraulic Analysis.
- Slope Stability Analysis.
- Conceptual Closure and Post-Closure Care Plans.
- Groundwater Sampling Reports.
- Other reports as required for the forms.

Task 3: Complete two (2) sets of the IOP application forms (four different forms); one paper copy for an original signature and one in electronic format.

Task 4: Develop cost estimates for Closure and Post-Closure Care activities to be used in the Financial Assurance forms (part of the IOP application).

Task 5: Assist CLP in the development and preparation of the required Financial Assurance forms required by IEPA.

Task 6: Assemble all the forms into two (2) copies, a hard copy in 3-ring notebooks and a bookmarked and tagged electronic format (PDF) copy. Both will be submitted to IEPA.

**Estimated Costs**

The cost estimate to perform all of the tasks referenced above is as follows:

Personnel	Units	Rate	Total
Adam Peetz, PE	40	\$140.00	\$ 5,600.00
Linda Denison, CHMM	50	\$120.00	\$ 6,000.00
Mark Underwood, PhD	130	\$ 90.00	\$ 11,700.00
Barry Franz PG, PE	100	\$110.00	\$ 11,000.00
Project Level Staff	150	\$ 80.00	\$ 12,000.00
Taylor Lammert	25	\$ 45.00	\$ 1,125.00
Admin Support	25	\$ 80.00	\$ 2,000.00
		Total	\$ 49,425.00

All rates have been discounted to a 2.5 multiplier. Services will be performed under the existing terms and conditions between ATON and CLP. Changes to this proposal and any future task orders will be valid only after the written agreement of both parties.

It is noted that this scope of service does not include outside activities that may be needed to complete the IOP application, such as surveying pond boundaries, completion of Construction Permit Applications, or completion of Closure and Post-Closure Plans and applicable Applications.

We sincerely appreciate the opportunity to provide our quality environmental and engineering consulting services. If I can assist you further, please contact me by telephone at (636) 349-0202. We look forward to working with you on a successful project.

Regards,



Adam Peetz, PE  
Vice President of Site Remediation and Development

Notice to Proceed:

Signature: <i>Nathan J. Long</i>	Company: <i>G. L. P.</i>
Name: <i>Nathan J. Long</i>	Date: <i>9/22/2021</i>