

W181120 0002



Synegy Midwest Generation, LLC
1500 Eastport Plaza
Cincinnati, OH 45244-0000

BUSINESS FINAL

May 8, 2017

U.S. Environmental Protection Agency
Bureau of Water
Division of Public Water Supplies
Groundwater Section
2021 N. Grand Avenue East
Springfield, IL 62761-8276

RECEIVED BY REGIONAL MANAGER
JUN 12 2017
REVIEWER: MAX

Attn: Mr. Richard T. Cobb, P.E.
Deputy Division Manager

Re: North and Old East Ash Pond Units at the Synegy Midwest Generation Vermilion Site

Mr. Cobb:

In response to the U.S. Environmental Protection Agency's February 24, 2017 letter regarding the North and Old East ash pond units at the Vermilion site (EPA Letter), Synegy Midwest Generation, LLC (SMG) identifies herein its plan to perform the engineering and hydrogeologic studies needed to develop and submit to the Agency the ash pond closure and river bank management plans for the North and Old East ash pond units.

To address Items 1 and 2 of the EPA Letter and to supplement the geotechnical study SMG submitted to the U.S. Environmental Protection Agency (Agency) on November 25, 2015, we have retained a geotechnical engineering consultant to identify the access requirements to protect the river bank of the Middle Fork Vermilion River (MFVR), current river bank location and potential river bank erosion relative to the access requirements. The consultant's report will include a map with the current river bank location, the location of the toe of the North and Old East ash pond berms and lines indicating the point at which river bank stabilization would need to be initiated. That report will be completed and submitted to the Agency by November 8, 2017.

We have also retained a civil engineering consultant to identify stone toe protection river bank stabilization options (Item 3 of the EPA Letter). That report will also be completed and submitted to the Agency by November 8, 2017.

Cost estimates will be prepared for each ash pond closure option and stone toe protection river bank stabilization options (Item 5 of the EPA Letter) so all the closure options with their associated river bank stabilization options can be compared (Item 6 of the EPA Letter). SMG will submit these options, cost analyses and a summary comparison to the Agency by December 1, 2017.