Vermilion Coal Ash Public Meeting: When and Where

What: A public meeting, hosted by Dynegy and required by IL coal ash regulations, where Dynegy will present its proposed closure plan for the coal ash at Vermilion.
Date: Thursday, December 9, 2021, at 3:00pm and 5:30pm CST (<u>Notice</u>)
Location: Palmer Arena, 100 W. Main St, Danville, IL
Virtual Option: Sign Up Required by December 8th at 12pm <u>Here</u>

What is Being Proposed? Dynegy's Closure Plan

Illinois's coal ash regulations require that a coal ash impoundment owner must evaluate possible closure alternatives and present the alternatives to the public at a public meeting. Due to an interim agreement with the IL Attorney General, Dynegy can only propose closure by removal. Dynegy proposes to close the Vermilion coal ash impoundments by removal, moving the coal ash to a new on-site landfill constructed outside of the floodplain.

Details:

- **Complete Removal.** The proposal includes removal of coal ash from all three coal ash impoundments: the North Ash Pond (NAP), the Old East Ash Pond (OEAP), and the New East Ash Pond (NEAP).
- **Demolished Power Plant.** Dynegy proposes to demolish the power plant in order to create the space needed to build the new landfill.
- **Timeline.** Between dewatering of the coal ash, plant demolition, landfill construction, and the removal of the coal ash, Dynegy estimates the closure will be completed in 2033.
- **Removal of Stabilization Measures Post-Closure.** Closure will include removal of any new temporary riverbank stabilization that may be used to stop erosion.
- **Remediation of Groundwater.** After the coal ash is removed, Dynegy is still required to ensure the remaining pollution already in the groundwater is cleaned up. Dynegy considered five alternatives and proposes to allow the pollution to disperse using a method called 'Monitored Natural Attenuation' (ie. Do Nothing).

Relevant Documentation:

- Key documents include the draft closure plans for the <u>NAP & OEAP</u>, the draft closure plan for the <u>NEAP</u>, new landfill <u>feasibility study</u>, and the closure <u>cost estimate</u>.
- Many additional documents can be found on Dynegy's page here (in the Vermilion folder).
- Also here: <u>prairierivers.org/dynegydocs</u>

Preparing for the Meeting

At the public meeting, Dynegy will present their plan and then take questions. The meeting is an opportunity for you to learn about Dynegy's plans, ask clarifying questions, raise concerns about what Dynegy is proposing, and share what you'd like to see happen. You should ask any questions that come to mind, and be sure to request a meeting summary from Dynegy when you speak. See the next page for questions you could consider.

Questions for Dynegy

We're considering these questions:

Before Removal

- **Demolition of the Coal Plant.** How will the site be protected during demolition, and remediated after demolition, to ensure none of the waste from demolition of the coal plant and smokestack enter the river or groundwater? Will nearby community members be notified when large demolition activities are planned to occur?
- **Community Concerns.** How is Dynegy planning to weigh and consider community comments and concerns?
- **Middle Fork River Advisory Committee**. Is Dynegy aware of the status of the Middle Fork River Corridor Advisory Committee referenced in the draft closure plans?
- Agency Permitting and Coordination. In the event that riverbank erosion proceeds in one or more areas to the extent that the eroded section must be buttressed, time will be of the essence. Have you initiated any pre-permitting coordination with regulatory agencies to expedite the process? Do you already have a proposal ready if an emergency occurs?
- Landfill Design. Is the landfill incised (dug into the ground)? If so, how will that interact with the cooling water lake adjacent to the power plant?

During Removal

- **Coal Ash Transportation**: Has Dynegy considered using a covered conveyor belt to move the coal ash instead of trucking it up the slope?
- Worker Protections. What is the plan for ensuring workers are protected from this toxic waste? Who will ensure that monitors are not tampered with, and worker health is not compromised by contractors who are more interested in meeting schedules than following approved plans?
- **Recycling Coal Ash.** Will any of the ash be recycled to reduce the amount of waste that needs to be stored? If so, how?
- **Eroding Riverbank Prevention.** What mechanisms and processes will be put in place to ensure that eroding river banks are protected as the site is being prepared for ash relocation? How will the riverbanks be protected during ash relocation?
- **Recreation.** What is the anticipated impact of the closure construction process on the ability to canoe and kayak along the Middle Fork? Do you anticipate any work being done within the river channel?
- **Berm Removal.** Will all of the berms that form the coal ash impoundments be removed and the floodplain restored to its original elevation? If not, why not?

After Removal

• **Remediation:** Once removal is complete, is there a re-vegetation plan for the areas that were once the impoundments? Will the gabions and rip-rap protecting all three coal ash impoundments be placed in the new landfill or removed from the site? Will native plants be re-established and invasives controlled?

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- Long-Term Cost of Landfill. Who will bear the long-term monitoring and maintenance costs of the new landfill? Can the company assure residents that these costs will not be borne by the taxpayer, and if so, how?
- **Cooling Water Lake & Other Property.** Will Dynegy continue to own the cooling water lake and the land that was the coal ash impoundments after closure is finished? Can the lake and surrounding area be made accessible to the public again for camping and fishing?
- **Removal of Contaminants.** Will the company clean up the sediment where coal ash pollutants have been collecting in the river channel for many years? If yes, what could be done? If the answer is no, why not?
- **Groundwater Cleanup.** Dynegy proposes to build a trench to collect polluted groundwater. Will all the polluted groundwater go into the trench? Where will it go from there? How long will Dynegy collect the polluted groundwater? How long until the groundwater is clean?

Coal Ash - A Toxic Threat to Water Quality and Human Health

- Coal ash is a waste byproduct of burning coal, and contains toxic metals that can cause serious health problems, including cancer.
- Coal ash is often stored on-site at power plants in <u>coal ash impoundments</u>, which are often referred to as "coal ash ponds" because they resemble man-made ponds filled with coal ash mixed with water.
- The Illinois Environmental Protection Agency ("Illinois EPA") identified 73 coal ash ponds at dozens of power plant sites across the state, nearly all of which are next to rivers and lakes. Groundwater at 22 of 24 coal ash sites tested in Illinois had unsafe concentrations of toxic coal ash pollutants.
- Safe closure of coal ash impoundments is critically important to protecting human health, drinking water, and the environment.
- Where coal ash has already contaminated the land and water, clean-up of the contamination is a major issue facing Illinois. We need to stop further contamination AND clean up the pollution already in our water.

Regulatory Background - What are the Upcoming Public Meetings?

- Illinois's new coal ash regulations provide multiple opportunities for the public to provide input on a coal ash owner's plans to close coal ash impoundments. The first opportunity for public input is coming up: the **public meeting**.
- Public Meetings are hosted by the owners of the coal ash impoundments.
 - At these meetings, the owners of coal ash impoundments present their proposed plans for closing a coal ash impoundment to the public for their input.
 - The Illinois EPA is not required to attend the public meeting. The meeting is between the public and the coal ash owner.
 - After this meeting, the owner will 'consider' public comments then submit a construction permit application, with a summary of comments, to the Illinois EPA.
- Next, the Illinois EPA reviews the permit applications and proposes a draft permit, triggering a public comment period. This may be months after the public meeting.
- **Public Comment Periods** are the next opportunity for public engagement. During this 45-day period, the public can submit written comments to the Illinois EPA, and also request a public hearing. The Illinois EPA is required to consider these comments.
- **Public Hearings** are hosted by the Illinois EPA, held at the public's request. At these official hearings, the Illinois EPA will take input on a permit they are proposing and is required to consider these comments.

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Site Description

The Vermilion Power Station has three coal ash impoundments: (1) the North Ash Pond; (2) the Old East Ash Pond; and (3) the New East Ash Pond. Also called "ash ponds" these are disposal sites formed by perimeter earthen embankments.

These impoundments contain a mix of coal ash materials (including fly ash, bottom ash, boiler slag, and other materials) with different chemical compositions (because of different types of coal burned over the power plant's lifetime).



Site Profile:

- **Closed Power Plant.** The Vermilion Power Station closed in 2011.
- **Middle Fork of the Vermilion River.** The power plant and the coal ash impoundments are located along the 17-mile nationally designated Scenic River.
- Three Coal Ash Impoundments. There are three coal ash impoundments for the site, all located in the floodplain of the Middle Fork of the Vermilion River. None of the coal ash impoundments are considered lined by regulations.
 - **Old East Ash Pond (OEAP).** 1.1 million cubic yards of coal ash.* Operated 1950s to mid 1970s.
 - North Ash Pond (NAP). 1.3 million cubic yards of coal ash.* Operated mid 1970s to 1989.
 - **New East Ash Pond (NEAP).** 0.5 million cubic yards of coal ash.* Operated from 1989 until the power plant closed in 2011.

*Dynegy now claims new coal ash volume estimates that are slightly smaller.

- Erosion & Bank Armoring. The NAPS and OEAP are located dangerously close to the Middle Fork, and the meandering river threatens to destabilize the impoundments. The Interim Agreement requires Dynegy to prepare a Safety Emergency Response plan to address an issue if it emerges. The NEAP had similar erosion issues in 2016 which caused Dynegy to dump large rocks on the bank to mitigate erosion.
- **Groundwater Pollution.** There is a long history of documented impact to the groundwater under and adjacent to the coal ash impoundments.
- **Groundwater Seeps.** The coal ash has been seeping pollution into the Middle Fork for years. The seeps emerge from the riverbank along the NAP and OEAP, staining the riverbank orange and oily purple. The Interim Agreement requires Dynegy to install a groundwater trench to prevent the seeps. Successful coal ash removal and corrective action would end the seeps permanently.