

# APPLICABILITY REPORT

## HUTSONVILLE ENERGY CENTER

### ASH POND D

### HUTSONVILLE, ILLINOIS

*Prepared for*

AmerenEnergy Medina Valley Cogen, LLC

*Prepared by*

**Geosyntec**   
consultants

engineers | scientists | innovators

1 McBride and Son Center Drive, Suite 202  
Chesterfield, Missouri 63005

Project Number GLP8085

May 2025

## INTRODUCTION

This Applicability Report (“Report”) has been prepared on behalf of AmerenEnergy Medina Valley Cogen, LLC (Medina Valley) to meet the requirements of 40 CFR. 257.100(f)(1)(i). The revised rule promulgated in May 2024 as a revision to the federal CCR rule (40 CFR Part 257, Subpart D). The purpose of this Report is to identify a legacy CCR surface impoundment owned and operated by Medina Valley at the former Hutsonville Energy Center.

An Applicability Extension Report [2] was previously developed for Ash Pond D and submitted by Medina Valley in accordance with the requirements of 40 CFR 257(f)(1)(iii). A field investigation workplan was included within the Applicability Extension Report to address identified data gaps.

This Applicability Report was developed based upon findings from the field investigation that followed the field investigation workplan.

Information is also included regarding the completed closure of the legacy CCR surface impoundment Ash Pond D in accordance with 40 CFR 257(i)(8) and 257.102(d).

Text that quotes federal regulations or portions thereof are presented in *italic font*.

## REPORT CONTENTS

### *§ 40 CFR 257.101(f)(1)(i)- Identifying Information*

This Report includes the following as specified in 257.100(f)(1)(i):

- (A) The name and address of the person(s) owning and operating the legacy CCR surface impoundment with their business phone number and email address.*
- (B) The name associated with the legacy CCR surface impoundment.*
- (C) Information to identify the legacy CCR surface impoundment, including a figure of the facility and where the unit is located at the facility, facility address, and the latitude and longitude of the facility.*
- (D) The identification number of the legacy CCR surface impoundment if one has been assigned by the state.*
- (E) A description of the current site conditions, including the current use of the inactive facility.*

The certification of the Applicability report by the owner in accordance with (f)(1)(ii) is included in **Attachment 3**.

This Report has been completed under an extension to the Applicability Report [2] in accordance with (f)(1)(iii).

*§ 40 CFR 257.100(i)- Completion of Closure Prior to November 8, 2024*

This Report includes the following as specified in 257.100(i)(8):

*Include in the applicability report information on the completed closure, along with supporting documentation to demonstrate that the closure meets the performance standards in § 257.102(d) or the standards specified in § 257.101(g);*

Information regarding closure under § 257.102(d) are presented in this Report.

*§ 257.102(d)- Closure Meets the Performance Standards when Leaving CCR in place*

This Report includes the following information and supporting documentation to demonstrate compliance with the performance standards when leaving CCR in place as specified in 257.102(d), summarized below.

*(d) Closure performance standard when leaving CCR in place*

*(1) General performance standard.*

*(2) Drainage and stabilization of CCR units.*

*(3) Final cover system.*

## **§ 40 CFR 257.100(f)(1)(i)- IDENTIFYING INFORMATION**

### **(A) Owner's Contact Information**

The name and address of the person(s) owning and operating the legacy CCR surface impoundment with their business phone number and email address, is as follows:

Name and address:

Craig J. Giesmann, P.E., P.M.P.  
Director, Environmental Services  
Ameren  
1901 Chouteau Avenue  
St. Louis, Missouri 63103

Phone Number:



Email address:



(B) Name of the Legacy CCR Surface Impoundment

The name of the legacy CCR surface impoundment is Ash Pond D.

(C) Legacy CCR Surface Impoundment Location Information

A figure that illustrates where the unit is located at the facility, and the latitude and longitude of the facility is presented in **Attachment 1**. This figure was developed by Ramboll and was obtained from their 2024 Groundwater Monitoring Annual Report for the Hutsonville site [1].

The address of the facility is:

15142 East 1900<sup>th</sup> Avenue  
Crawford County  
Hutsonville, IL 62433

(D) Illinois Environmental Protection Agency (IEPA) Identification Number

The IEPA Identification number is: W0330100003-04.

(E) Current Site Conditions and Use

A description of the current site conditions, including a description of the current use of the inactive facility, is presented in **Attachment 2**.

## **§ 40 CFR 257.100(i)- COMPLETION OF CLOSURE PRIOR TO NOVEMBER 8, 2024**

The relevant portion of this paragraph is to include specific information regarding compliance with the relevant performance standard in 257.100(i)(8). This information is presented herein.

## **§ 257.102(d)- CLOSURE PERFORMANCE STANDARD WHEN LEAVING CCR IN PLACE**

*257.102(d)(1) General performance standard. The owner or operator of a CCR unit must ensure that, at a minimum, the CCR unit is closed in a manner that will*

*257.102(d)(1)(i) Control, minimize, to the maximum extent feasible, post-closure infiltration of liquids into the waste and releases of CCR, leachate, or contaminated run-off to the ground surface water or to the atmosphere;*

Hutsonville Ash Pond D is closed with a final cover system that minimizes post-closure infiltration of liquids into the waste, releases of CCR, leachate, or run-off contact with CCRs to the ground surface water or to the atmosphere.

*257.102(d)(1)(ii) Preclude the probability of future impoundment of water, sediment, or slurry;*

Hutsonville Ash Pond D is currently closed with a final cover system that precludes the probability of future impoundment of water, sediment, or slurry. The cover slopes are approximately 5%. Rainfall runoff is directed to drainage swales sloped at approximately 5% and off the cover.

*257.102(d)(1)(iii) Include measures that provide for major slope stability to prevent sloughing or the movement of the final cover system during the closure and post-closure care period.*

The cover system has been designed and constructed to maintain major slope stability and prevent sloughing as described in the Closure Plan [3] and CQA Report [5].

*257.102(d)(1)(iv) Minimize the need for further maintenance of the CCR unit; and*

Hutsonville Ash Pond D is maintained through an inspection and maintenance program.

*257.102(d)(1)(v) Be completed in the shortest amount of time consistent with recognized and generally good engineering practices.*

Hutsonville Ash Pond D was closed in 2013; this is the shortest amount of time under recognized and generally good engineering practices at the time of closure.

*257.102(d)(2) **Drainage and stabilization of CCR units.** The owner or operator of any CCR units must meet the requirements of paragraphs (d)(2)(i) and (ii) of this section prior to installing the final cover system required under paragraph (d)(3) of this section.*

*257.102(d)(2)(i) Free liquids must be eliminated by removing liquid wastes or solidifying the remaining wastes and waste residues.*

All surface waters were removed and the remaining wastes were stabilized sufficient to support the final cover system at the time of closure.

*257.102(d)(2)(ii) Remaining wastes must be stabilized sufficient to support the final cover system.*

The remaining wastes were stabilized sufficient to support the final cover system at the time of closure.

*257.102(d)(3) **Final cover system.** If a CCR unit is closed by leaving CCR in place, the owner or operator must install a final cover system that is designed to minimize infiltration and erosion and at a minimum, meets the requirements of paragraph d(3)(i) of this section, or the requirements of the alternative final cover system specified in paragraph (d)(3)(ii) of this section.*

The owner installed an alternative final cover system in accordance with paragraph 257.102(d)(3)(ii) of this section. The closure plan was approved by the Illinois Environmental Protection Agency (IEPA) prior to construction by an approval letter on April 8, 2012 [4]. The Closure Report and Certification of completion of Closure were submitted to IEPA on January 30, 2013. [6]

*257.102(d)(3)(ii) The owner or operator may select an alternative final cover system design, provided the alternative final cover system is designed and constructed to meet the criteria in paragraphs (d)(3)(ii)(A) through (C) of this section. The design of the final cover system must be included in the written closure plan required by paragraph (b) of this section.*

The following demonstrates equivalent compliance with paragraphs 257.102(d)(3)(ii)(A), (B) and (C).

*257.102(d)(3)(ii)(A) The design of the final cover system must include an infiltration layer that achieves an equivalent reduction in infiltration as the infiltration layer specified in paragraphs (d)(3)(i)(A) and (B) of this section.*

The alternative final cover system design was included in the written closure plan for Hutsonville Ash Pond D [3]. The alternate cover system of Hutsonville Pond D consists of a 40-mil HDPE cover liner overlain with a 3-foot layer of infiltration layer soil. The bottom is constructed on fine grained sediments and has a permeability greater than the geomembrane final cover; therefore, the final cover infiltration layer meets the requirement of 257.102(d)(3)(i)(A).

*257.102(d)(3)(ii)(B) The design of the final cover system must include an erosion layer that provides equivalent protection from wind or water erosion as the erosion layer specified in paragraph (d)(3)(i)(C) of this section.*

*257.102(d)(3)(i)(C) states: The erosion of the final cover system must be minimized by the use of an erosion layer that contains a minimum of six inches of earthen material that is capable of sustaining native plant growth.*

The alternative final cover system was designed and installed in 2012. The alternate cover system includes a three-foot thick erosion layer of earthen material above the cover geomembrane liner. It includes an upper six inches of vegetative growth soil that can sustain native plant growth. Vegetation has been maintained during post-closure and the erosion layer provides equivalent protection from wind or water erosion. The cover has been inspected quarterly from 2013 through 2024. There is no significant evidence of wind or water erosion, and it meets the requirements of 257.102(d)(3)(ii)(B) and 257.102(d)(3)(i)(C).

*257.102(d)(3)(ii)(C) The disruption of the integrity of the final cover system must be minimized through a design that accommodates settling and subsidence.*

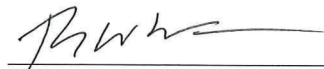
The final cover system was designed and installed in 2012. It is comprised of a three-foot-thick soil layer with the upper six inches vegetated with grass to meet this criterion. It has been inspected quarterly from 2013 through 2024. There has been no significant settling nor subsidence and ponding has been precluded.

257.102(2)(3)(iii) *The owner or operator of the CCR unit must obtain a written certification from a qualified professional engineer or approval from the Participating State Director or approval from EPA where EPA is the permitting authority that the design of the final cover system meets the requirements of this section.*

I, Thomas Ward, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify in accordance with Section 40 CFR 257.102(d)(3)(iii), to the best of my knowledge, information, and belief, that the that the design of the final cover system meets the requirements of 40 CFR 257.102(d)(3).

Thomas Ward, P.E.

Printed Name



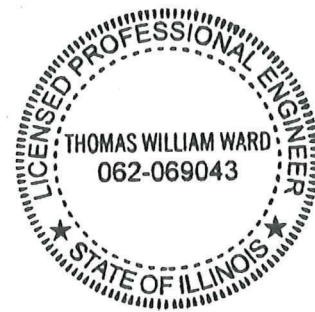
Signature

5/8/25

Date

062.069043      Illinois      30 November 2025

Registration Number   State   Expiration Date

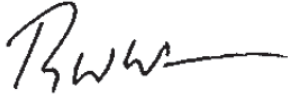




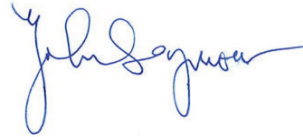
## CERTIFICATION

40 CFR 257.100(f)(1)(ii)(A) requires certification from the owner or operator that the information reviewed was true, accurate and complete. This certification is provided in **Attachment 3**.

Sincerely,



Thomas Ward, P.E. (IL, MO, KY, IA, AL, OH, IN, TN)  
Senior Engineer



John Seymour, P.E. (IL)  
Senior Principal

### Attachments:

Attachment 1: Location Information

Attachment 2: Description of Current Site Conditions and Use

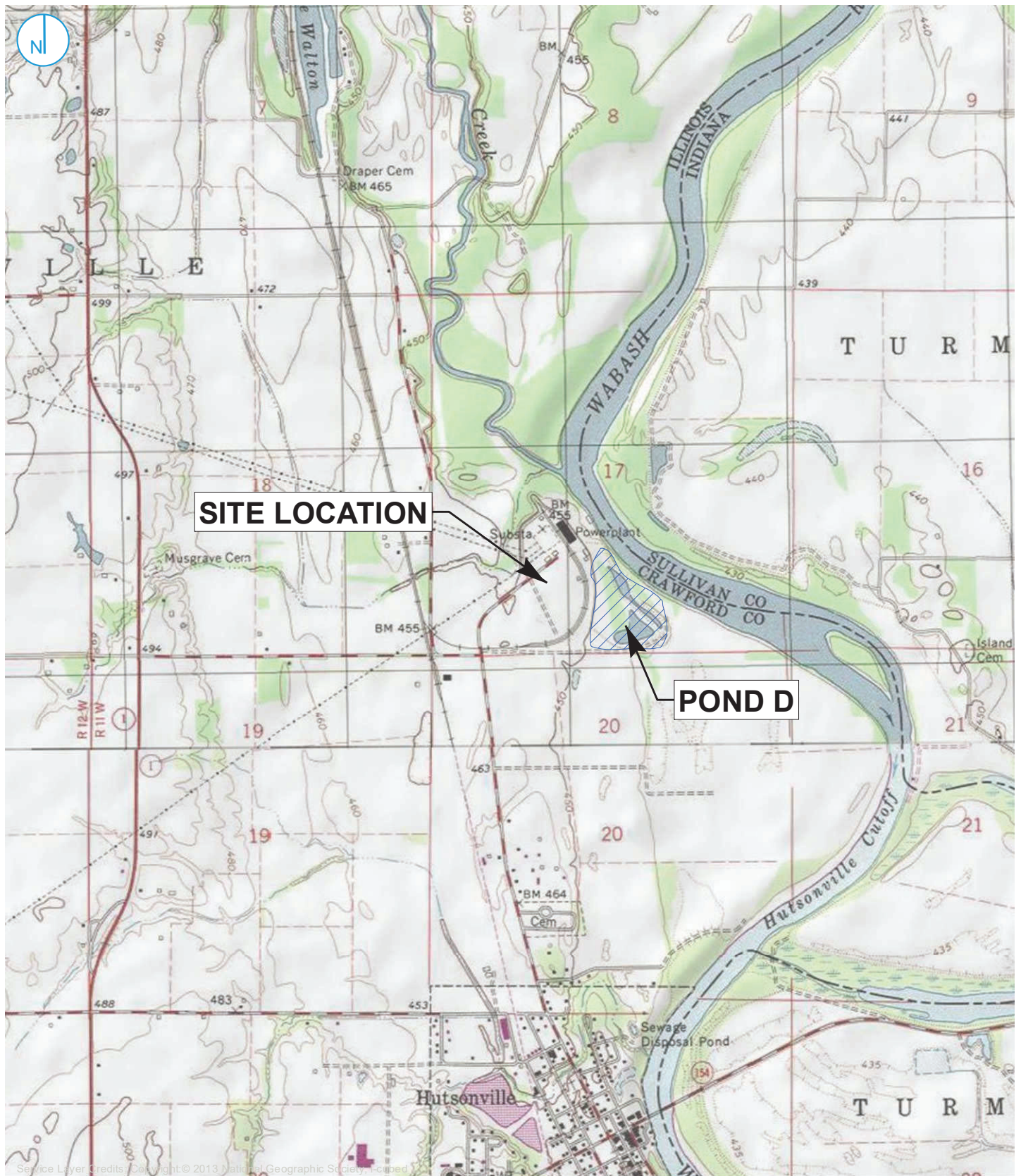
Attachment 3: Certification by Owner

## REFERENCES

- [1] Ramboll, "2024 Groundwater Monitoring Annual Report - Former Hutsonville Power Station - Ash Pond A," Ramboll, Chicago, 2025.
- [2] Geosyntec Consultants, Inc., "Applicability Extension Report, Hutsonville Energy Center, Ash Pond D, Hutsonville, Illinois," AmerenEnergy Medina Valley Cogen, LLC, St. Louis, 2024.
- [3] Hanson Professional Services "Closure Plan: Closure of Ash Pond D, Hustonville Power Station" Hanson Professional Services, Springfield, 2012.
- [4] Illinois Environmental Protection Agency, "Hutsonville, Pond D Closure and Post Closure Care Plans Approval Letter," William E. Buscher, P.G., 2012.
- [5] Geotechnology, Inc., "Construction Quality Assurance Report, Ashd Pond D Closure, Hutsonville Power Station, 15142 East 1900 Avenue, Crawford County, Illinois," Geotechnology, Inc., St. Louis, 2012.
- [6] Ameren Services, "Pond D Closure at Ameren Energy Generating Company's Hutsonville Power Station," John C. Pozzo, 2013.

**ATTACHMENT 1**  
**LEGACY SURFACE IMPOUNDMENT APPLICABILITY REPORT**  
**HUTSONVILLE ENERGY CENTER – POND D**  
**SITE PLAN**

GLP8085/2025-05-08-Hutsonville\_Pond\_D-ApplicabilityReport-FINAL



Map Scale: 1:124,000;  
Map Center: 87°39'45"W 39°7'53"N

0 1,000 2,000  
Feet

## SITE LOCATION MAP

FIGURE 1-1

RAMBOLL AMERICAS  
ENGINEERING SOLUTIONS, INC  
A RAMBOLL COMPANY

2024 ANNUAL REPORT  
FORMER HUTSONVILLE  
POWER STATION - ASH POND D  
AMEREN ENERGY MEDINA VALLEY COGEN, LLC  
HUTSONVILLE, IL

RAMBOLL





FIGURE 1-2

MONITORING WELL LOCATION MAP

2024 ANNUAL REPORT  
 FORMER HUTSONVILLE POWER STATION - ASH POND D  
 AMEREN ENERGY MEDINA VALLEY COGEN, LLC  
 HUTSONVILLE, IL

RAMBOLL AMERICAS  
 ENGINEERING SOLUTIONS, INC  
 A RAMBOLL COMPANY



- PROPERTY LINE
- APPROXIMATE BOUNDARY OF CAPPED ASH POND
- GROUNDWATER COLLECTION TRENCH (BEGAN OPERATION APRIL 2015)
- LIMITS OF GROUNDWATER MANAGEMENT ZONE

- ASH POND D MONITORING WELL LOCATION
- NESTED ASH POND D MONITORING WELL LOCATION
- ASH POND A MONITORING WELL LOCATION
- NESTED ASH POND A MONITORING WELL LOCATION
- ABANDONED NESTED MONITORING WELL LOCATION

0 150 300 Feet

PROJECT: 169000XXXXX [DATED: 1/24/2023] [DESIGNER: gailmmc] Service Layer Credits: Sources: Esri, Maxar, Earthstar Geographics, and the GIS User Community NAD 2017

**ATTACHMENT 2**  
**LEGACY SURFACE IMPOUNDMENT APPLICABILITY REPORT**  
**HUTSONVILLE ENERGY CENTER – POND D**  
**CURRENT CONDITIONS AND USE**

**CURRENT CONDITIONS**

AmerenEnergy Medina Valley Cogen, LLC (Medina Valley) Company's Hutsonville Energy Center (the Facility) is a retired (inactive) electric power generating facility with a coal fired unit located approximately one and a half miles north of the Village of Hutsonville, Crawford County, Illinois. Ash Pond D lies near the banks of the Wabash River and is bordered to the west and south by farmland; to the north by wooded areas; and to east by the Wabash River.

Ash Pond D was operational from 1968 until 2000 and served as the primary disposal location for coal combustion waste at the plant during that time. The coal combustion waste was sluiced to Ash Pond D where solids were allowed to settle. Ash Pond D contains both fly ash and bottom ash [2]. The IEPA has assigned an identification number to Ash Pond. The IEPA Identification number is: W0330100003-04.

Ash Pond D was closed in 2012 and is capped with a soil and geomembrane liner cover system [3]. Ash Pond D closure was completed in accordance with the IEPA approved Closure Plan and the Closure Report and Certification of completion of Closure were submitted to IEPA on January 30, 2013 [4] [5]. Rainfall stormwater runoff from Ash Pond D is diverted to vegetated and concrete lined ditches and discharges through a permitted NPDES outfall to the Wabash River.

**CURRENT USE**

Hutsonville Pond D was closed in October 2012 [3]. The Site is currently inactive and not being utilized for another purpose.

**REFERENCES**

- [1] Ramboll, "2024 Groundwater Monitoring Annual Report - Former Hutsonville Power Station - Ash Pond D," Ramboll, Chicago, 2025.
- [2] Hanson Professional Services, "Closure Plan: Closure of Ash Pond D - Hutsonville Power Station," Hanson Professional Services, Springfield, 2011.
- [3] Geotechnology, Inc., "Construction Quality Assurance Report, Ash Pond D Closure, Hutsonville Power Station, 15142 East 1900 Avenue, Hutsonville, Crawford County, Illinois," Geotechnology, Inc., St. Louis, 2012.

- [4] Illinois Environmental Protection Agency, "RE: Hutsonville, Ash Pond D Closure and Post Closure Care Plans Approval Letter," William E. Buscher, P.G., 2012.
- [5] Ameren Services, "Pond D Closure at Ameren Energy Generating Company's Hutsonville Power Station," Ameren, St. Louis, 2013.

**ATTACHMENT 3**  
**LEGACY SURFACE IMPOUNDMENT APPLICABILITY REPORT**  
**HUTSONVILLE ENERGY CENTER – POND D**  
**CERTIFICATION BY OWNER**

The owner or operator, or an authorized representative, of any legacy CCR surface impoundment must sign and certify the applicability report required by 40 CFR 257.100(f)(1)(ii)(A) with the following statement:

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

I do so certify.



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Craig Giesmann, P.E., P.M.P.

May 8, 2025