

Midwest Generation, LLC
Powerton Generating Station
13082 E. Manito Road
Pekin, IL 60087

October 13, 2021

Illinois Environmental Protection Agency
Division of Water Pollution Control
Attention: Compliance Assurance Section, Mail Code #19
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Subject: Effluent Limitation Guidelines Notice of Planned Participation
Midwest Generation, LLC - Powerton Generating Station
Account No. W1798010008
NPDES Permit No. IL0002232

To Darin LeCrone:

Midwest Generation, LLC (MWG) must manage the discharge of bottom ash transport water to surface waters of the state in accordance with USEPA's Final Steam Electric Reconsideration Rule (ELG Rule), effective December 14, 2020, at the Powerton Generating Station (Powerton) located in Pekin, Illinois. The ELG rule provides multiple compliance pathways listed in 40 CFR 423.13, including an ELG-compliant bottom ash system with up to 10% purge (§423.13(k)(2)(i)), permanent cessation of coal burning activities due to retirement or repowering (§423.13(k)(2)(ii)), or low utilization electric generating units (§423.13(k)(2)(iii)).

In accordance with 40 CFR 423.19(f)(1) and NPDES Permit No. IL0002232, Condition 23, MWG is hereby providing a Notice of Planned Participation (NOPP) for Powerton's generating units that will achieve permanent cessation of coal combustion by December 31, 2028.

1. Electric Generating Units intending to achieve permanent cessation of coal combustion:
 - Unit 5
 - Unit 6
2. Expected date that each electric generating unit is projected to achieve permanent cessation of coal combustion:
 - Unit 5 – No later than December 31, 2028
 - Unit 6 – No later than December 31, 2028
3. Whether each date represents a retirement or a fuel conversion:
 - Unit 5 – Retirement
 - Unit 6 – Retirement

4. Whether each retirement or fuel conversion has been approved by a regulatory body:
Unit 5 – Not Yet Requested
Unit 6 – Not Yet Requested

5. What the regulatory body is:
PJM

The NOPP shall also include a copy of the most recent integrated resource plan for which the applicable state agency approved the retirement or repowering of the unit subject to the ELGs, certification of electric generating unit cessation under 40 CFR 257.103(b), or other documentation supporting that the electric generating unit will permanently cease the combustion of coal by December 31, 2028.

As MWG has not yet requested deactivation of Powerton's generating units from PJM, no documentation supporting that the electric generating unit will permanently cease the combustion of coal is provided.

6. The NOPP shall also include, for each such generating unit, a timeline to achieve the permanent cessation of coal combustion. Each timeline shall include interim milestones and the projected dates of completion. Note the timeline below also includes interim milestones and projected dates of completion for the installation of an ELG-compliant bottom ash system.

A detailed timeline to achieve permanent cessation of coal combustion is not yet available as deactivation notices have not yet been submitted to PJM. This information will be provided in future annual progress reports once available.

Please note that MWG would like to preserve the option to choose a different compliance pathway if circumstances change as this flexibility is contemplated by the ELG Rule. Please contact Ms. Jill Buckley at (724) 448-9732 or Jill.Buckley@nrg.com if you have any questions or need any additional information regarding this submittal.

Sincerely,



Dale Green
Plant Manager
Powerton Generating Station

cc: Mark Liska, Illinois EPA
Asset Management, MWG