Midwest Generation, LLC
Will County Generating Station
529 E. 135th Street
Romeoville, IL 60446

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 - Will County Generating Station

Account No. W19781011

NPDES Permit No. 1L0002208

To Darin LeCrone:

In accordance with 40 CFR 423.19(f)(1), Midwest Generation, LLC (MWG) is hereby providing a Notice of Planned Participation (NOPP) for the Will County Generating Station'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 3

Unit 4

2. Expected or actual date that each electric generating unit is projected to achieve permanent cessation of coal combustion:

Unit 3 – April 15, 2015

Unit 4 = On or about June 1, 2022

3. Whether each date represents a retirement or a fuel conversion:

Unit 3 – Retirement

Unit 4 = Retirement

4. Whether each retirement or fuel conversion has been approved by a regulatory body:

Unit 3 - Notice of No Reliability Impacts received

Unit 4 - Notice of No Reliability Impacts received

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.

Documentation that PJM performed a reliability analysis and that no reliability impacts were identified can be found on PJM's website here https://pjm.com/planning/services-requests/gen-deactivations and also in Attachment 1.

 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.

Action	Actual or Estimated Timeline			
Filed Deactivation Notice for Unit 3 with PJM	August 22, 2014			
Reliability analysis response received for Unit 3	September 19, 2014			
Cease coal-fired operations of Unit 3	April 15, 2015			
Filed Deactivation Notice for Unit 4 with PJM	June 29, 2021			
Reliability analysis response received for Unit 4	July 30, 2021			
Cease coal-fired operations of Unit 4	Estimated on or about June 1, 2022			

Midwest Generation, LLC would like to reserve the ability to modify the plans for ELG rule compliance at the Will County Station, including but not limited to changing the expected shutdown date, but in no case later than December 31, 2028, requesting authorization to continue as a low-utilization unit, or discharge bottom ash transport water discharge limits in accordance with 40 CFR 423.13(k)(2).

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,

Phillip Raush Plant Manager

Will County Generating Station

Attachments:

PJM Documentation

ce: Mark Liska, Illinois EPA

Asset Management, MWG





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Generation Deactivations

Generator deactivations can alter power flows that may yield violations of established transmission system reliability criteria. Therefore system upgrades may be required to correct any identified reliability violation, in many areas of PJM. Visit the Learning Center site to learn about the steps PJM takes to keep the grid stable when power plants retire (http://learn.pjm.com/three-priorities/planning-for-the-future/explaining-power-plant-retirements.aspx).

The list of deactivations is typically updated within 24 business hours of notification from the generator. If a deactivation is not shown, PJM has not been notified of the deactivation.

				100	Download: XL	I XML (/Media/Pl	[Media/Planning/gen-deactivation-data/GenDeactivationU			
				Future	Deactivations	Deactivate	d Generators	Withdraw	n Deactivations	
Unit will county 3	Capacity (MW) Total: 251	Fuel Type (All) ▼	State (All) ▼	Age	Transmission Owner Zone (All) ▼	Owner Notification Date	Actual Deactivation Date	Reliability Analysis (All) 🔻	Related Upgrades & I	
Will County 3	251	7	IL	57	ComEd	8.22.2014	4.15.2015	0		

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Mailing Address 2750 Monroe Boulevard Audubon, PA 19403

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					Download: 🕮	XAL (/Media/Pl	anning/gen-deactiva	tion-data/Geni	JeactivationUnits.xml)
				Future	Deactivations	Deactivate	d Generators	Withdraw	n Deactivations
Unit will county	Capacity (MW) Total: 510	Fuel Type (All) ▼	State (All) ▼	Age	Transmission Owner Zone (All) ▼	Owner Notification Date	Requested Deactivation Date	Reliability Analysis (All) •	Related Upgrades &
Will County 4	510	Ħ	IL	58	i ComEd	6.29.2021	5.31.2022	②	TEAC 2.11.2016 PDF (/-/media/committee groups/committees/t generation-deactivati 1.7.2015 PDF (/-/media/committee groups/committees/t reliability-analysis-up b2732.2

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Unit Name	Capacity		Reliability Must Run (RMR)	Status	State		Transmission Owner Zone
Will County 3	251	Coal	No	Deactivated Generator	Illinois	57	ComEd
Will County 4	510	Coal	No	Future Deactivation	Illinois	58	ComEd

Owner Notification Date	Requested Deactivation Date	Projected Deactivation Date	Actual Deactivation Date	Withdrawn Deactivation Date	Reliability Analysis	TEAC Materials	RMR Zonal Cost Allocation
8/22/2014			4/15/2015		Reliability analysis complete; no impacts identified	24	
6/29/2021	5/31/2022	5/31/2022			Reliability analysis complete; no impacts identified	https://www.pjm.com/-/media/committees-groups/committees/teac/20160211/20160211-generation-deactivation-notification.ashx, https://www.pjm.com/-/media/committees-groups/committees/teac/20150107/20150107-reliability-analysis-update.ashx	

RMR Study	Related
Results	Upgrades
	b2613,
	Ь2721,
	b2732.2

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Column Name Definition

Unit Name The name of the unit deactivating Capacity The capacity of the deactivating unit Fuel Type Reliability Must Run (RMR)

The type of fuel the unit was running Reliability Must Run: Unit has requested to stay in service and not deactivate until certain system upgrade(s) are completed.

Status Indicates whether the deactivation is for the future, past or has been withdrawn

State The state the generator resided in

Age The age of the generator at the time of the deactivation request

Transmission Owner Zone The transmission owner zone the unit resides in Owner Notification Date The date in which PJM was notified of the deactivation

Requested Deactivation Date The Date the Generator Owner has requested to Deactivate the Generator

Projected Deactivation Date The Initial Deactivation date the generator owner submits, until the analysis is complete. Once the analysis is complete and any impacts identified, it is the date that FIM

plans for the generator to deact vate. The date the generator deactivated

Actual Deactivation Date Withdrawn Deactivation Date Reliability Analysis The date the deactivation submission was withdrawn The status of the Reliability Analysis Study

TEAC Date The date any associated upgrades were presented at PJM's Transmission Expansion Advisory Committee (TEAC) TEAC Material The Materials presented at PJM's Transmission Expansion Advisory Committee (TEAC) for any associated upgrades

HMR Zonal Cost Allocation Zonal cost allocation files for reliability must run (RMR) submissions

RMR Study Results Study result files for RMR submissions

Belated Upgrades All upgrade requests associated with the deactivation request, if any