



Midwest Generation, LLC
Joliet 29 Generating Station
Documentation of Public Meeting

35 Ill. Adm. Code Sections 845.240(d) and 845.800(d)(2)

Midwest Generation, LLC's (MWG) Joliet 29 Generating Station (Joliet 29 Station) is located at 1800 Channahon Road in Joliet, Illinois. Joliet 29 Station operates one existing coal combustion residual (CCR) surface impoundment, Pond 2. Because the location of the pond is designated as a potential area of environmental justice concern in the Illinois Environmental Protection Agency's (Illinois EPA) EJ Start screening tool, MWG is required to submit a construction permit application for closure to the Illinois EPA by February 1, 2022.

Pursuant to 35 IAC Section 845.240, MWG held two public meetings on the tentative application and as required by subsection (d) of that section, MWG is placing documentation of the meeting in its operating record consisting of the following Exhibits:

- Exhibit A: Public Notice (November 5, 2021)
- Exhibit B: Map of 2-mile radius of impoundment (selected postal routes highlighted blue) and USPS Every Door Direct Mail forms
- Exhibit C: Posting of notice in conspicuous locations within 10 miles of the facility
- Exhibit D: Letter to Illinois EPA requesting notice be sent to listserv for MWG
- Exhibit E: Presentation for December 8 and 9, 2021 public meetings
- Exhibit F: Summary of public meetings

Exhibit A:

Public Notice (November 5, 2021)



Public Notice

Midwest Generation to Host Public Meetings on Closure Plans for Joliet 29's Pond 2

What: Midwest Generation is hosting two public meetings to share information and engage with the community about its proposed plans to close Pond 2, consistent with state and federal environmental regulations. The Joliet Station no longer generates power from coal and no longer produces coal ash. All coal ash has already been removed from the lined pond. MWG is proposing to close the cleaned-out pond and repurpose it to treat non-coal ash wastewater, including stormwater, area runoff and water from operations. MWG anticipates filing a construction permit application with the State of Illinois in February 2022. Following a presentation at the meetings, participants will have the opportunity to participate in a question-and-answer session. Spanish translation will be available.

When: Dec. 8, 2021, 10 a.m. to 12 p.m. CT
Dec. 9, 2021, 6 p.m. to 8 p.m. CT

Where: Due to COVID-19 restrictions, meetings will be virtual. Visit midwestgenerationllc.com on or after **Nov. 8, 2021** for information on how to participate. Participants can also dial in by phone during designated meeting times using the phone number **312.626.6799** and Meeting ID **882 7655 7396**.

Information on closure construction permit applications will be posted at midwestgenerationllc.com no later than **Nov. 8, 2021**.

Contact: midwestgeneration@nrg.com



Notificación Pública

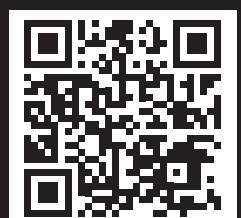
Midwest Generation organizará reuniones públicas sobre los planes de cierre de estanque 2 de Joliet 29

Que: Midwest Generation organizará dos reuniones públicas para compartir información e interactuar con la comunidad sobre sus planes propuestos para cerrar el estanque 2, de acuerdo con las regulaciones ambientales estatales y federales. La estación de Joliet ya no genera energía a partir del carbón y ya no produce cenizas de carbón. Toda la ceniza de carbón ya se ha eliminado del estanque revestido. MWG propone cerrar el estanque limpio y reutilizarlo para tratar aguas residuales que no sean de cenizas de carbón, incluidas el agua de lluvia, la escorrentía del área y el agua de las operaciones. MWG anticipa presentar una solicitud de permiso de construcción al Estado de Illinois en febrero de 2022. Luego de la presentación en las reuniones, los participantes tendrán la oportunidad de participar en una sesión de preguntas y respuestas. Se facilitará traducción al español.

Cuando: 8 de dic. de 2021, de 10 a.m. a 12 p.m. CT
9 de dic. de 2021, de 6 p.m. a 8 p.m. CT

Donde: Debido a las restricciones por COVID-19, las reuniones serán virtuales. Visite midwestgenerationllc.com el **8 de nov. de 2021** o después de esa fecha para conocer más información sobre cómo participar. Los participantes también pueden participar mediante llamada telefónica durante tiempos designados de la reunión a través del número **312.626.6799** y ID de reunión **882 7655 7396**.

La información sobre las solicitudes de permisos de construcción de cierre se publicará en midwestgenerationllc.com a más tardar el **8 de nov. de 2021**. Contacto: midwestgeneration@nrg.com





Public Notice

Midwest Generation to Host Public Meetings on Closure Plans for Joliet 29's Pond 2

PRSR STD
ECRWSS
U.S. POSTAGE
PAID
EDDM RETAIL

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**** ECRWSS EDDM **

Postal Customer

Information on closure construction permit applications will be posted at midwestgenerationllc.com no later than **Nov. 8, 2021**. Contact: midwestgeneration@nrg.com





Notificación Pública

Midwest Generation organizará reuniones públicas sobre los planes de cierre de estanque 2 de Joliet 29

PRSR STD
ECRWSS
U.S. POSTAGE
PAID
EDDM RETAIL

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**** ECRWSS EDDM **

Postal Customer

La información sobre las solicitudes de permisos de construcción de cierre se publicará en midwestgenerationllc.com a más tardar el **8 de nov. de 2021**. Contacto: midwestgeneration@nrg.com



Exhibit B:

Map of 2-mile radius of impoundment -
selected postal routes highlighted blue

Search for Routes

Radius

1800 Channahon Road, Joliet, IL 60436



2 mi



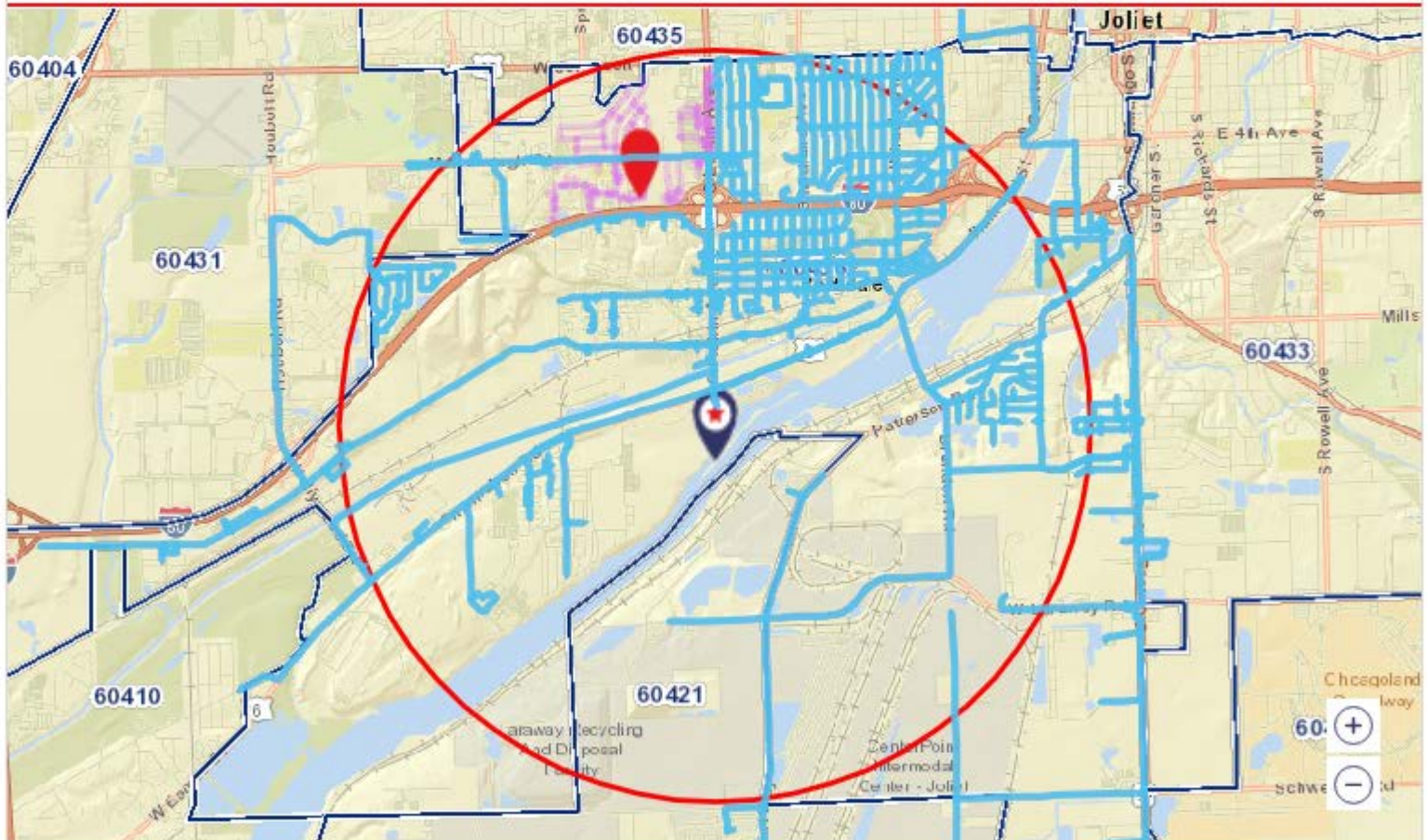
Search

Clear

Refine Search

View as: **Map** **Table**

Route Residential Business Total Age: 25-34 Size Income Cost



Map Key

Show

POST OFFICE LOCATIONS AND DROP INFORMATION

Information provided below identifies the Post Office retail units that service the ZIP Codes and routes included in your mailing. Each mailing must be taken to the specified Post Office retail unit as indicated below for processing at the discount postage rate.

1 JOLIET
2000 MCDONOUGH ST
JOLIET, IL 60436

Phone:
(815) 773-1060
Fax: (815) 773-1079
800-ASK-USPS

Retail Business Hours


| M | T | W | Th | F | Sa | Su |
|---------|---------|---------|---------|---------|---------|--------|
| 08:00AM | 08:00AM | 08:00AM | 08:00AM | 08:00AM | 08:00AM | |
| 05:30PM | 05:30PM | 05:30PM | 05:30PM | 05:30PM | 02:00PM | Closed |

| ZIP Code | Route | Mailpieces | ZIP Code | Route | Mailpieces | ZIP Code | Route | Mailpieces |
|-------------------------------|-------|------------|-----------------------------------|-------|------------|----------|-------|------------|
| 60436 | C082 | 429 | 60436 | C085 | 541 | 60436 | C011 | 585 |
| 60436 | C054 | 577 | 60436 | C012 | 358 | 60436 | C084 | 660 |
| 60436 | C050 | 405 | 60432 | R030 | 395 | 60436 | R012 | 451 |
| Total Mailpieces: 4401 | | | Approximate Cost: \$880.20 | | | | | |

United States Postal Service
Every Door Direct Mail (EDDM) Retail®

Post Office: Note Mail Arrival Date & Time
 (Do Not Round Stamp)

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|---------------|--|-----------------------------|--|-----------|
| Mailer | Name and Address of Individual or Organization for Which Mailing is Prepared MINUTEMAN PRESS JOLIET 1400 ESSINGTON RD JOLIET, IL, 60435 | Telephone (815) 582-4014 | Name and Address of Mailing Agent (If other than mailer) | Telephone |
| | Customer Registration I.D. (CRID) 7466450 | | Customer Registration I.D. (CRID) _____ | |

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|---|---|---|--|------------------------------|
| Post Office of Mailing JOLIET | Processing Category <input checked="" type="checkbox"/> EDDM Flats | Mailer's Mailing Date 11/06/2021 | Total # of Bundles | Total # of Pieces per Bundle |
| Type of Postage <input type="checkbox"/> EDDM Retail Indicia <input type="checkbox"/> Metered <input type="checkbox"/> Meter Strip | Delivery Type Residential | Weight of a Single Piece ____ . ____ ounces Max Weight 3.3 ounces | Every Door Direct Mail Barcode  | |
| | Route Type(s) Rural,CTY | Incentive/Discount Claimed | 1100000000000746645000000082768450440116 | |

| Entry | Price Category | Price | No. of Pieces | Subtotal Postage | Incentive/Discount Amount | Total Postage | Status |
|-------|----------------|-------|---------------|------------------|---------------------------|---------------|-------------|
| DDU | Saturation | 0.200 | 4,401 | \$880.20 | | \$880.20 | PAID ONLINE |

Affix Meter Strip Here

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| Certification | The mailer's signature certifies acceptance of liability for and agreement to pay any revenue deficiencies assessed on this mailing, subject to appeal. If an agent signs this form, the agent certifies that he or she is authorized to sign on behalf of the mailer and that the mailer is bound by the certification and agrees to pay any deficiencies. In addition, agents may be liable for any deficiencies resulting from matters within their responsibility, knowledge, or control. The mailer hereby certifies that all information furnished on this form is accurate, truthful, and complete; that the mail and the supporting documentation comply with all postal standards and the mailing qualifies for the prices and fees claimed; and that the mailing does not contain any matter prohibited by law or postal regulation. I understand that anyone who furnishes false or misleading information on this form or who omits information requested on this form may be subject to criminal and/or civil penalties, including fines and imprisonment. | | |
| | Privacy Notice: For information regarding our Privacy policy visit www.usps.com | | |
| | Signature of Mailer or Agent | Printed Name of Mailer or Agent Signing Form | Telephone |

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|---------------------------------|---|---------------------------------------|---------------------------|---------------------------------|
| Acceptance USPS Use Only | Postmaster: Report Total Postage in AIC 207 | Subtotal Postage | Incentive/Discount Amount | Acceptance USPS Use Only |
| | Weight of a Single Piece ____ . ____ ounces | Total Number of Pieces | Total Postage | |
| | USPS Acceptance Employee Signature | Round Date (Required) Payment Date | | |
| | USPS Acceptance Employee Printed Name | | | |

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| Verification USPS Use Only | Number of Bundles | Any postage figures adjusted from mailer's entries? If yes, reason: <input type="checkbox"/> Yes <input type="checkbox"/> No | | Verification USPS Use Only |
| | I CERTIFY that this mailing has been inspected for each item below if required: (1) eligibility for postage prices claimed; (2) proper preparation (and presort where required); (3) proper completion of postage statement. | Round Date (Required) Verification Date | | |
| | | Date Mailer Notified | Contact | |
| | | By (Initials) | Time AM PM | |
| USPS Verification Employee Signature | Print USPS Verification Employee Printed Name | | | |

**EVERY DOOR DIRECT MAIL - RETAIL™
FACING SLIP**

| Mailer Information |
|---|
| Company Name: <p align="center">MINUTEMAN PRESS JOLIET</p> |
| Post Office of Mailing <p align="center">JOLIET</p> |

USPS TRACKING #



9309 9899 5550 0000 0359 4156 73

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|---|--|--|
| 5-Digit ZIP Code (Required): <p align="center">60436</p> | Route Number (Required): <p align="center">C054</p> | Delivery Type: <p align="center">Residential</p> |
| Date: | Total # of Mailpieces per Bundle: | Total # of Bundles*: <p align="center">_____ of _____</p> |

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**EVERY DOOR DIRECT MAIL - RETAIL™
FACING SLIP**

| Mailer Information |
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| Post Office of Mailing JOLIET |

USPS TRACKING #



9309 9899 5550 0000 0359 4164 96

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|---|--|---|
| 5-Digit ZIP Code (Required): 60436 | Route Number (Required): C084 | Delivery Type: Residential |
| Date: | Total # of Mailpieces per Bundle: | Total # of Bundles*: _____ of _____ |

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** Mailers must prepare bundles to comply with standards*
Generated by USPS -- Every Door Direct Mail - Retail Facing Slip

**EVERY DOOR DIRECT MAIL - RETAIL™
FACING SLIP**

| Mailer Information |
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| Post Office of Mailing JOLIET |

USPS TRACKING #



9309 9899 5550 0000 0359 4156 59

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| 5-Digit ZIP Code (Required): 60436 | Route Number (Required): C085 | Delivery Type: Residential |
| Date: | Total # of Mailpieces per Bundle: | Total # of Bundles*: _____ of _____ |

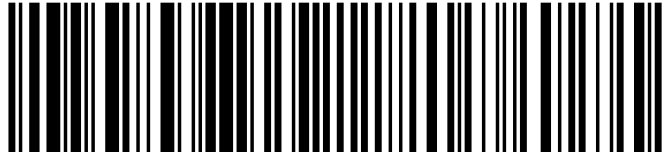
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**EVERY DOOR DIRECT MAIL - RETAIL™
FACING SLIP**

| Mailer Information |
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| Company Name: MINUTEMAN PRESS JOLIET |
| Post Office of Mailing JOLIET |

USPS TRACKING #



9309 9899 5550 0000 0359 4165 26

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| 5-Digit ZIP Code (Required): 60436 | Route Number (Required): R012 | Delivery Type: Residential |
| Date: | Total # of Mailpieces per Bundle: | Total # of Bundles*: _____ of _____ |

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Exhibit C:

Posting of notice in conspicuous locations
within 10 miles of the facility

MWG Canvass Summary

December 2021

To meet Section 845.240 Pre-Application Public Notification and Public Meeting regulation:

Post the notice in conspicuous locations throughout villages, towns, or cities within 10 miles of the facility, or use appropriate broadcast media (such as radio or television);

Joliet 29 and Joliet 9

We identified and contacted via telephone a total of **70 locations** within 10 miles of the facility in the City of Joliet. The first day of outreach was Friday, November 5, 2021. The second day of outreach was Tuesday, November 23, 2021. In the instances where we were not able to post a notice, the facilities were closed or refused.

The bilingual public meeting notices were placed at **35 locations**, including:

- Joliet Public Library, Black Road Branch
- Will County Circuit Clerk
- Will County Law Library
- Amtrak Station, Joliet
- Spanish Community Center
- Joliet Train Station
- Mitchell's Food Mart
- Jewel-Osco (Larkin Ave)
- Jewel-Osco (Jefferson St)
- Fellowship Bible Church
- St. George Church Sanctuary
- Village of Rockdale
- Manhattan-Elmwood Public Library District
- White Oak Library District: Romeoville Branch
- Romeoville Village Hall
- Lewis University Library
- New Lenox Public Library District
- New Lenox Village Hall
- White Oak Library District: Crest Hill Branch
- Village of Oswego
- Shorewood-Troy Public Library
- Shorewood Village Hall
- Three Rivers Public Library District
- Starbucks (x5)
- St. John Missionary Baptist
- Restoration Christian Church
- Dollar General

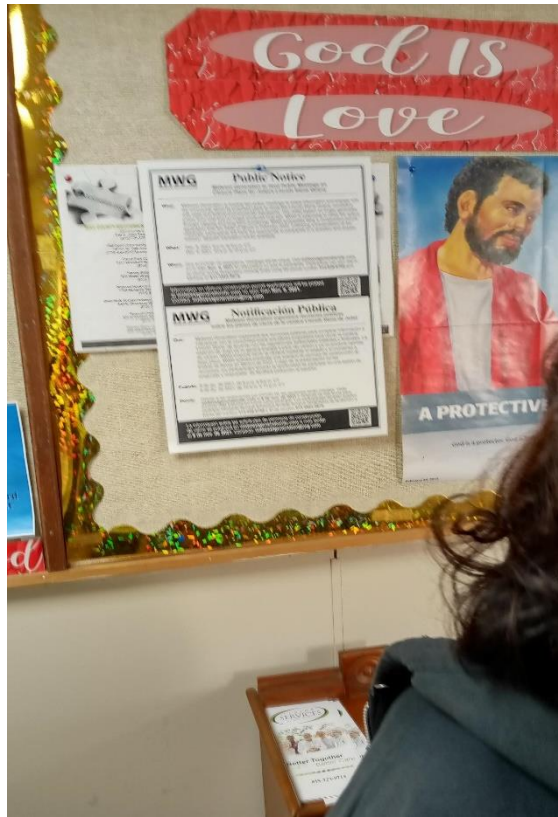
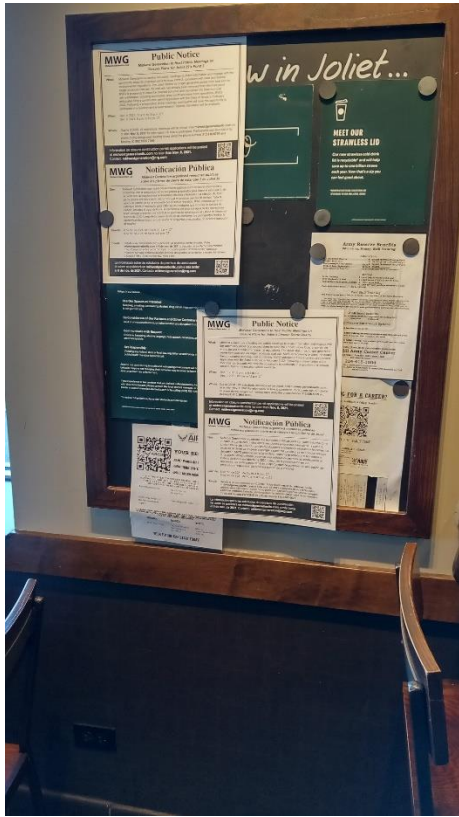
- Walgreens
- Second Baptist Church
- Manhattan Village Hall
- Willow Falls Senior Living

Twenty-one locations refused or were closed, including:

- Messiah Lutheran Church
- Friendship Baptist Church
- Old Central Church
- St. Patrick's Church
- Church of God Joliet South
- All Nations Church of God in Christ
- Plainfield Public Library District
- Grace Bible Church
- Plainfield Village Administration
- LaVerne and Dorothy Brown Library
- Mosaic Community Church
- USPS (x2)
- Dunkin (x2)
- Jewel-Osco (x2)
- Harrah's
- Super Mercados El Guiro
- Food 4 Less
- Walmart

Joliet Pictures





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Exhibit D:

Submittal to Illinois EPA requesting notice
be sent to listserv for MWG



Midwest Generation, LLC
Joliet Generating Station
1800 Channahon Road
Joliet, Illinois 60436

November 5, 2021

VIA CERTIFIED MAIL

Illinois Environmental Protection Agency
DWPC – Permits MC #15
Attn: Part 845 Coal combustion Residual Rule Submittal
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276


**Re: Joliet 29 Generating Station – Joliet, Will County, Illinois
Facility ID No. W1970450047
Notice of Public Meeting for CCR Construction Permit Application**

Dear Sir or Madam:

In accordance with the requirements of 35 IAC Section 845.240(b), please find enclosed the public meeting notice for Pond 2 (ID No. W1970450047-02) at Joliet Generating Station. These meetings are being held in anticipation of submittal of closure construction permit applications on the schedule provided in 35 IAC 845.700(h)(1).

Midwest Generation, LLC requests that the Agency email this notice to the Agency’s listserv for the facility. An electronic copy of this notification has been submitted to the Agency’s CCR Coordinator.

If you have any questions or require additional information regarding this submittal, please contact me at [REDACTED].

Sincerely,

Sharene Shealey

Director, Environmental

CC via Email: Illinois EPA CCR Coordinator
William Naglosky, Joliet Station Plant Manager
DeAndre Cooley, Joliet Station Environmental Specialist
Jill Buckley, Environmental Manager

Exhibit E:

Presentation for December 8 and 9, 2021
public meetings



Midwest Generation LLC.

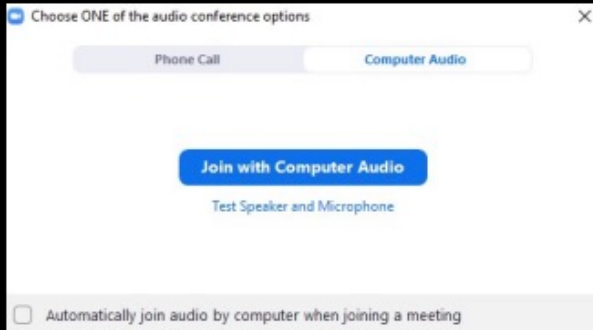
Joliet 29 – Ash Pond 2 ID No. W1970450047-02

Proposed Closure Construction Project

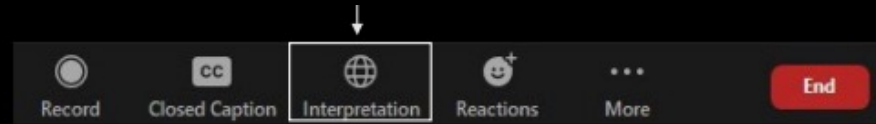
December 2021

Instrucciones Para la Audiencia Para Interpretación en Zoom

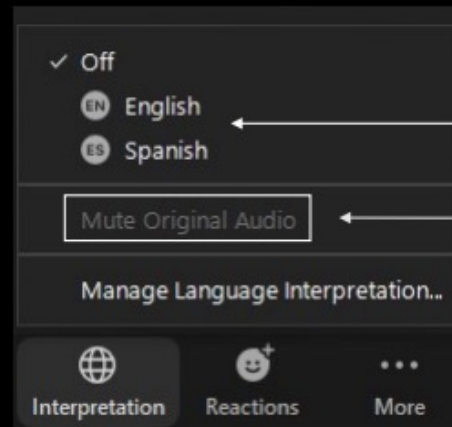
1. Seleccione unirse a la llamada con el audio de la computadora.



2. Seleccione el Globo "Interpretación" en la parte inferior izquierda de la pantalla.



3. Seleccione el idioma en que desea escuchar la interpretación.



Esta opción desactiva la voz del ponente, para que así el oyente solo escuche la interpretación.

COVID-19 PRECAUTIONS

- Holding this meeting virtually due to the COVID-19 pandemic
- Participants in Q and A portion will be following CDC protocols
 - Social Distancing
 - Wearing masks
 - Will pull down masks only to speak

In today's meeting, you can:

Enter questions in "Chat"

Click the chat icon on your screen and type your question

Participate in a live Q&A session

Verbal questions will be taken. After our presentation, we will provide instructions for the live Q&A.

Sign up for a post-meeting summary and IEPA listserv

During the meeting, click the link that Midwest Generation, LLC has placed in the Chat to complete the Google form.

[Public Website: midwestgenerationllc.com](http://midwestgenerationllc.com)

- Illinois Coal Ash & Other Environmental Rules
- Joliet Generating Station Background
- Closure Alternatives Analysis and Groundwater Modeling
- Proposed Closure and Post-Closure Plan
- Question & Answer Session

- In 2015, the US EPA finalized the Federal CCR Rules to regulate coal ash landfills and surface impoundments at power plants.
- In 2019, the state passed a law to regulate coal ash stored in CCR surface impoundments at power plants throughout Illinois.
 - The law required that the Illinois Environmental Protection Agency propose, and that the Illinois Pollution Control Board adopt, state regulations for storage and disposal of coal ash produced from electric generating facilities through a new permitting program.
- As required by the law, the Illinois EPA and the Board undertook a public rulemaking process that resulted in the Board adopting regulations at *35 IAC Part 845 – Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments* (the Illinois Coal Ash Rules) in April 2021.
- Additionally, Pond 2 is permitted as part of the Station's wastewater treatment system by the Illinois EPA under the NPDES permitting program.

The Illinois Coal Ash Rules define both CCR and CCR surface impoundments:

"Coal combustion residuals" or "CCR" means fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers.

"CCR surface impoundment" or "impoundment" means a natural topographic depression, man-made excavation, or diked area, which is designed to hold an accumulation of CCR and liquids, and the surface impoundment treats, stores, or disposes of CCR.

We're here today to present plans regarding a specific aspect of the Illinois Coal Ash Rules – the planned closure of Joliet 29 Pond 2, the Station's only CCR surface impoundment.

The Illinois EPA Bureau of Water treats Joliet Generating Station as two separate facilities – Joliet 29 and Joliet 9



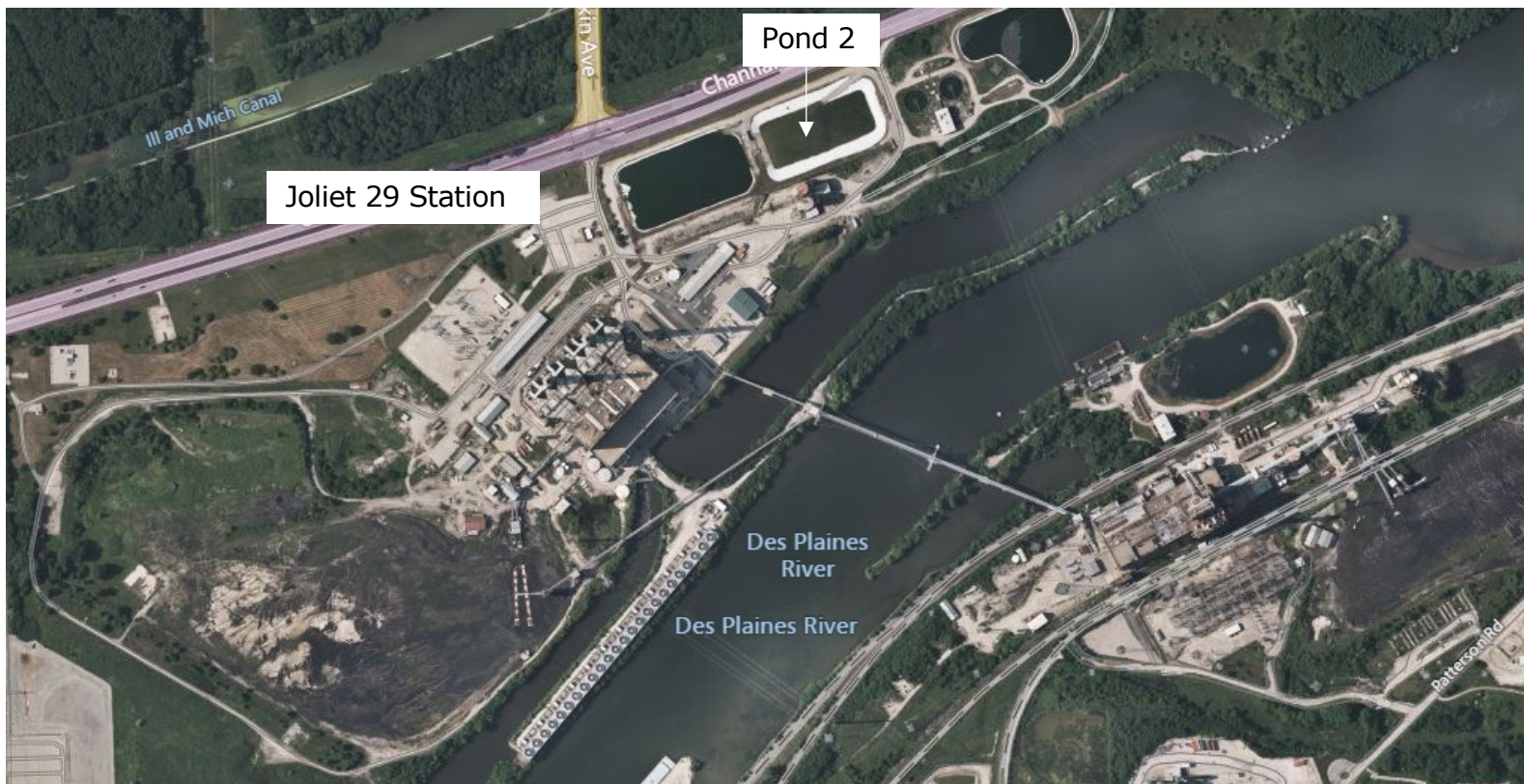
Joliet 29 Station (Units 7 & 8) is on the northern side of the Des Plaines River, Joliet 9 Station (Unit 6) is on the southern side of the river.



Question? Click the chat icon at the bottom of your screen to type a question.

¿Pregunta? Haga clic en el icono del chat en la parte inferior de la pantalla para escribir su pregunta.

- In 2016, the Electric Generating Units were permanently converted to use natural gas. The station no longer burns coal and no longer generates coal ash.
 - The gas conversion reduced both short-term and long-term emissions of multiple air pollutants.
- When the Electric Generating Units used coal, both Pond 1 and Pond 2 were used to temporarily store CCR. The only type of CCR stored in the Joliet 29 Station ponds was bottom ash which is the non-combustible residue that settles to the bottom of the power plant's boilers
 - MWG removed the ash from Joliet Pond 1, and it no longer stores bottom ash. Because it was emptied and ceased storing coal ash, Pond 1 is not subject to the Illinois Coal Ash Rules.



- Joliet 29 CCR was primarily disposed at the Lincoln Stone Quarry located at the Joliet 9 facility
 - Bottom ash was sluiced from Unit 7 & 8 via a pipe that crosses the river
 - When the sluice pipe was unavailable, bottom ash was stored in Pond 2 as a backup location
- Pond 2 was originally lined with a concrete-like material called Poz-o-pac. In 2008, the pond was lined with a High-Density Polyethylene (“HDPE”) liner (*i.e.* - thick and impermeable plastic)
- CCR was routinely removed from Pond 2 and disposed at the Lincoln Stone Quarry. In 2019 all remaining CCR was removed from the impoundment and the pond has not been in service since
- No CCR or wastewaters are currently directed to Pond 2

Pond 2 doesn't contain CCR, only the sand and limestone warning layer remain. The warning layer was used to “warn” operators of the liner during routine removal of ash from the Pond.

Evaluation of two closure methods, both allowed by regulation:

- Closure by Removal of CCR

An owner or operator may elect to close a CCR surface impoundment by removing all CCR and decontaminating all areas affected by releases of CCR from the CCR surface impoundment. CCR removal and decontamination of the CCR surface impoundment are complete when all CCR and CCR residues, containment system components such as the impoundment liner and contaminated subsoils, and CCR impoundment structures and ancillary equipment have been removed. Closure by removal must be completed before the completion of a groundwater corrective action under Subpart F. *(35 IAC Section 845.740(a))*

- Closure in Place

If a CCR surface impoundment 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 this subsection (c). The final cover system must consist of a low permeability layer and a final protective layer. The design of the final cover system must be included in the preliminary and final written closure plans required by Section 845.720 and the construction permit application for closure submitted to the Agency. *(35 IAC Section 845.750(c))*



Question? Click the chat icon at the bottom of your screen to type a question.

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- Consists of excavating existing warning layer (and possibly geomembrane liner) and disposing at a permitted landfill facility
 - Warning layer = 4,810 cubic yards of sand and limestone, that is in place to alert excavators of the existence of the liner
 - Liner = 70,000 square feet
- Onsite Landfill
 - No onsite landfill exists
 - Impractical to build
- Offsite Landfill
 - Excavation and hauling of warning layer would take approximately 7 days
 - No loading points currently in place for either rail or barge onsite

Closure by removal would require offsite landfill space because onsite landfill space doesn't exist

- Minimizes long-term management needs associated with post-closure care
- Additional permits or approvals that may be required include:
 - Board approval to reuse the liner; and/or
 - Potential modification of existing third-party off-site landfill permit for new waste stream acceptance
- Requires at least 3 years of post closure care groundwater monitoring. No impacts to groundwater from Pond 2 have been observed

- Consists of leaving the warning layer and geomembrane liner in place and installing a final cover system
- Final cover system would require additional fill to account for final grades, a geomembrane low permeability layer, and a final protective layer
 - Additional fill needed to ensure proper slopes to direct stormwater to the pond discharge structure = 69,300 cubic yards
 - Time to deliver additional fill = approximately 93 days, based on 50 truckloads/day and 15 cubic yards/truck
- ClosureTurf
 - Final protective layer is replaced with engineered synthetic turf that is infilled with sand/small aggregate
 - Successfully used around the country and in Illinois to close CCR surface impoundments and landfills

With the conversion to natural gas, Joliet Station no longer produces CCR or CCR contact water, but still needs to manage wastewater.

Types of water Joliet Station still manages:

- Storm water – rainwater and snow melt is directed toward various ponds on site, including Pond 2
- Plant drains – various drains around the plant flow to the ponds
- Reverse Osmosis (RO) sand filter backwash – water for steam production is purified by media (sand) filtration & RO prior to use. The RO system & media filters are cleaned with water and that water is treated before discharge.

In May 2021, MWG requested an Adjusted Standard from the Board for some of the requirements of the Illinois Coal Ash Rule:

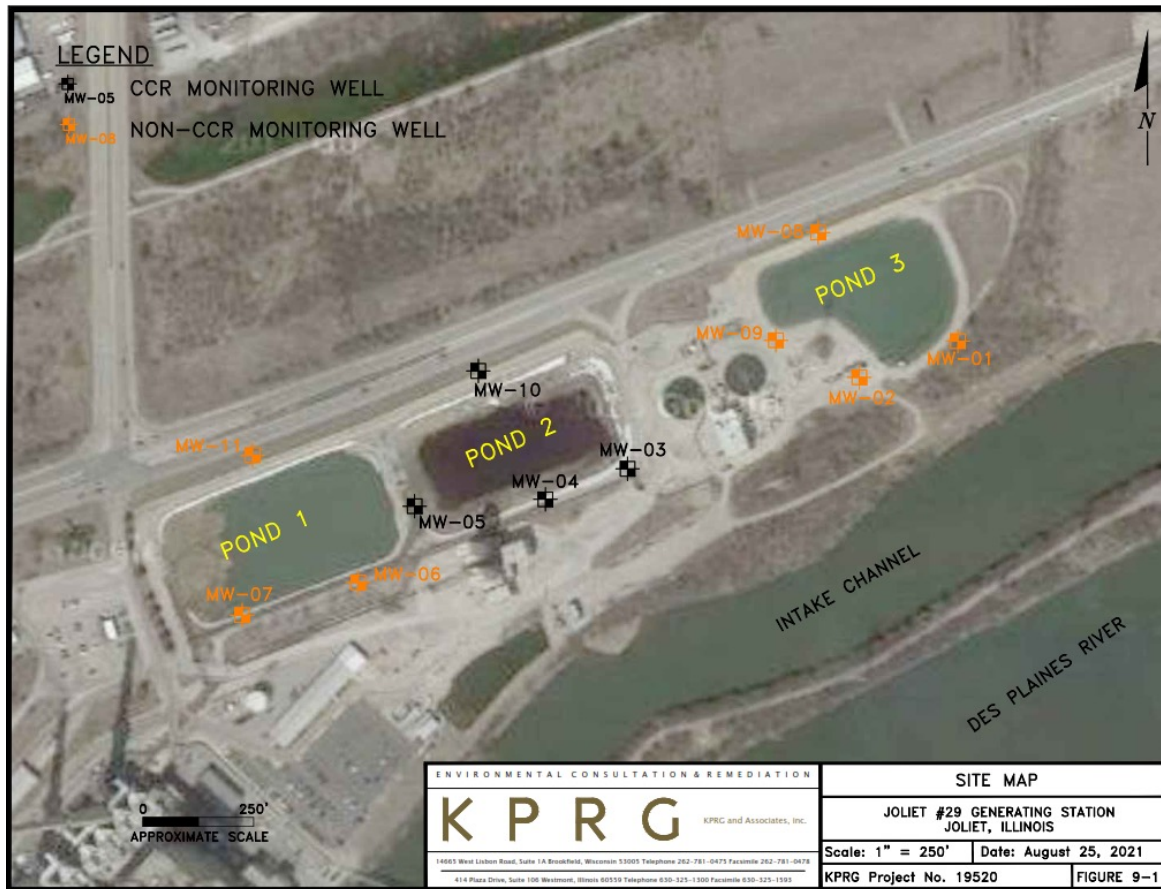
1. Finding of inapplicability of rules to Pond 1 and Pond 3 since they are not used to treat or store CCR
 - Illinois EPA's recommendation filed with the Board states that IEPA agrees that Ponds 1 and 3 are not CCR surface impoundments
2. The ability to reuse the liner system in Pond 2 for non-CCR wastewater
 - Although ash has been removed, the IL CCR rule requires the removal of the containment system components, impoundment structures, and ancillary equipment. MWG believes that these can be decontaminated and reused.



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- Groundwater quality and flow conditions are monitored quarterly via a groundwater monitoring well network installed around the pond
- No Statistically Significant Increases of CCR constituents have been observed in the groundwater wells attributable to Pond 2



To comply with the Illinois Coal Ash Rule, MWG conducted groundwater modeling of the groundwater concentrations. The purpose of the groundwater modeling was to provide a platform from which to be able to compare the relative effectiveness of various closure and/or corrective action alternatives relative to groundwater quality on a short term and long-term basis for the CCR unit.

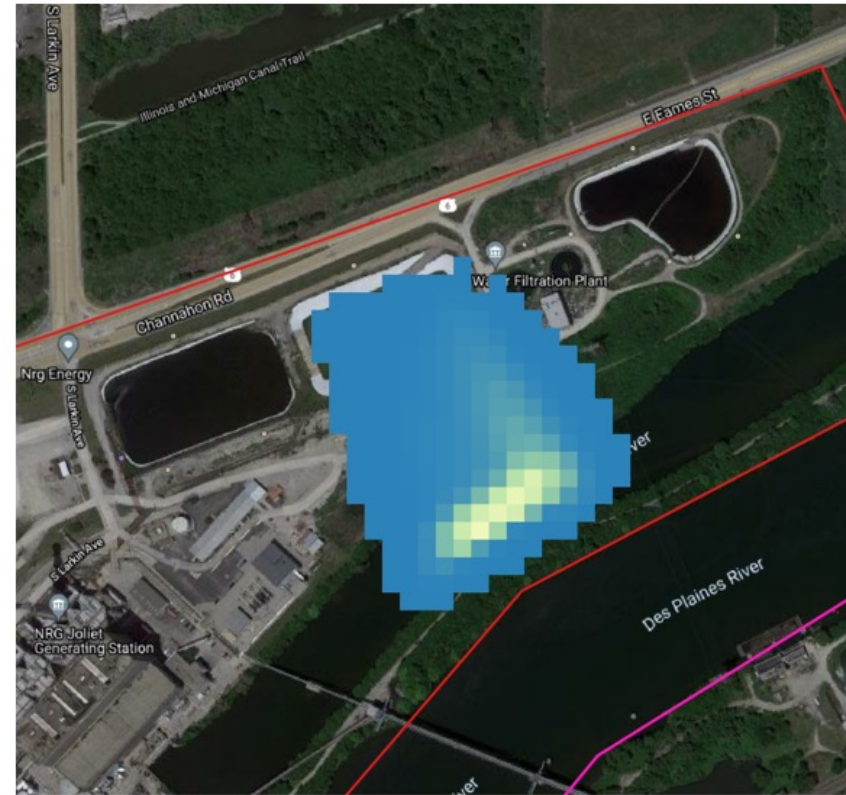
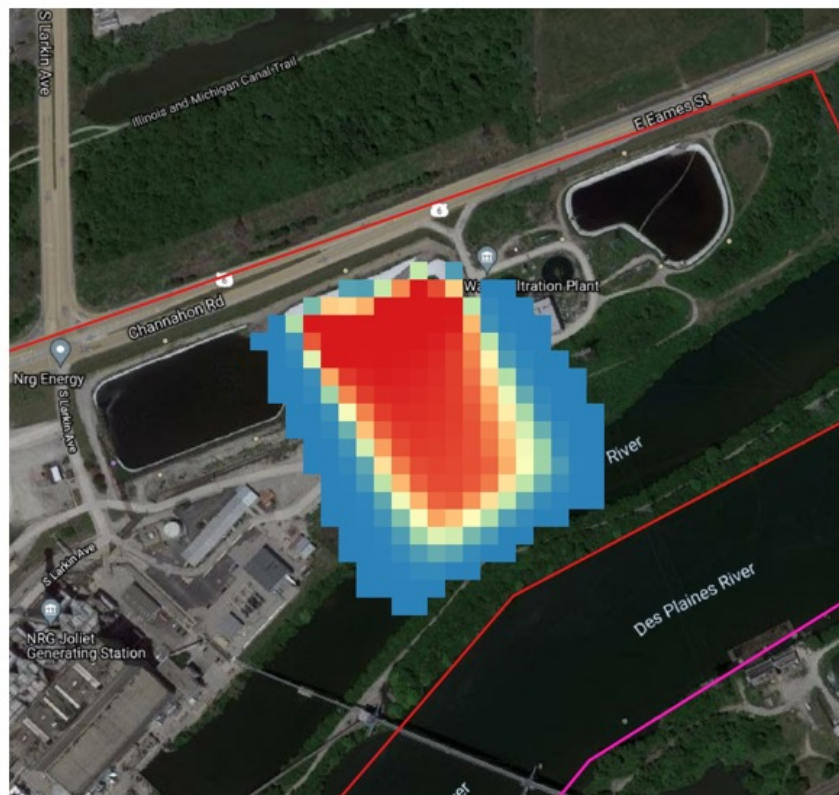
To accomplish this, the model establishes a theoretical source of contamination (i.e., not an actual source) in the pond and allowed to distribute itself over time until an equilibrium (stable) condition is observed by the model (worst case distribution of impacts).

This model looks at theoretical, potential contamination from the CCR unit – it assumes the pond has ash and water and that the liner is compromised or non-existent.

Once equilibrium is established, engineering alternatives can be overlain and the model is then run over a time sequence to evaluate the change/improvement in water quality associated with the proposed alternative.

Hypothetical "Source" remains beneath Pond 2

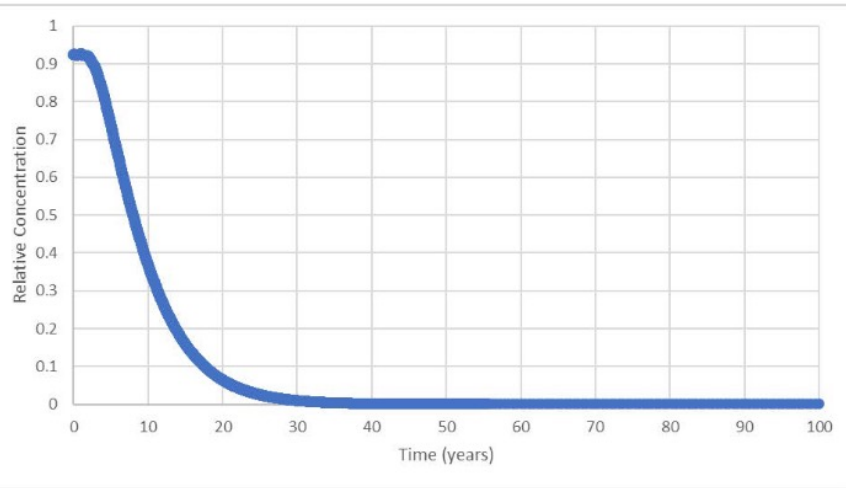
Source Removal Alternative



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- ❑ 100-year concentration distribution used as initial concentrations
- ❑ No source beneath Pond 2
- ❑ Seasonal fluctuations in recharge



The modeling shows at a point near the river, the initial “source” concentrations are reduced by nearly 100% within 30 years, when a point of relative equilibrium is reached.

The closure by removal and closure in place (ClosureTurf) options were evaluated based on effectiveness/protectiveness, ease of implementation, and addressing the concerns of the community.

- Closure in place:
 - Requires 69,300 cubic yards of fill to direct stormwater to the discharge structure
 - 93 days to complete
 - 30 years of post closure care monitoring
- Closure by removal without Adjusted Standard:
 - Excavation, transportation, disposal of approximately 4,800 cubic yards of warning layer
 - Excavation, transportation, disposal of an additional 70,000 linear feet of liner material
 - Approximately 100 days to complete
 - 3 years of post-closure care monitoring
- Closure by removal with Adjusted Standard:
 - Same excavation, transportation, disposal of the 4,800 cubic yards of warning layer described. No disposal of the liner material. Same 3 years of post-closure monitoring.
 - Approximately 7 days to complete

For Pond 2, MWG will propose closure by removal & repurposing the liner for Plant Wastewater

- Consists of excavating existing warning layer and relocating to a permitted landfill facility and thoroughly cleaning the liner for reuse
- Minimizes long-term management needs associated with post-closure care
- The anticipated post-closure care period for Pond 2 is 3 years after closure is complete
- The proposed end use of the pond will be repurposing into a low volume wastewater pond

No impacts to groundwater from Pond 2 have been observed



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Public Website:
midwestgenerationllc.com

| | Closure by Removal for Pond Re-use: All CCR removed | Closure-in-Place with a ClosureTurf Final Cover System: Majority of CCR removed, only de minimus amounts remain in warning layer |
|---|--|---|
| Magnitude of existing risk reduction | Risk reduced to non-existent | Risk reduced to minimal/non-existent |
| Likelihood of future CCR releases | Likelihood of future releases non-existent | Likelihood of future releases minimal |
| Long-term management required | Groundwater monitoring required for a minimum of 3 years | Inspections of the final cover and groundwater monitoring required for a minimum of 30 years. |
| Short-term risks to the community during closure activities | Minimal/non-existent - 7 days of truck traffic to haul warning layer offsite. Trucks would not travel through residential areas. | Minimal - 3-4 months of truck traffic to deliver fill material. Trucks would not travel through residential areas. |
| Time to complete closure, post-closure or 845.740(b) groundwater monitoring | Closure: 1-2 weeks Post Closure Groundwater Monitoring: 3+ years | Closure: 5 months Post Closure Groundwater Monitoring: 30+ years |
| Potential threat to human health and environment | Minimal/non-existent - all CCR removed | Minimal/non-existent – de minimus amount of CCR remaining in the warning layer will be capped to prevent contact with humans and stormwater |

Appendix – Closure Alternatives Analysis Summary

| | Closure by Removal for Pond Re-use: All CCR removed | Closure-in-Place with a ClosureTurf Final Cover System: Majority of CCR removed, only de minimus amounts remain in warning layer |
|--|--|--|
| Long-term reliability of engineering/institutional controls | Not applicable because no engineering/institutional controls necessary. | Geomembrane final cover systems have effectively been used throughout the country for decades; Closure Turf has been effectively used for over 10 years |
| Potential for future corrective action | Not required | Minimal to nonexistent |
| The extent containment reduces further releases | No releases have been observed; no further releases possible because all CCR removed | No releases have been observed; final cover system prevents contacts of de minimus amount of remaining CCR from contacting stormwater which reduces likelihood of future releases. |
| Extent of the use of treatment technologies | Not applicable, no treatment technologies used | Not applicable, no treatment technologies used |
| Degree of difficulty associated with constructing technology | Excavation and hauling of material are routine construction activities - not difficult | Filling, grading, and compacting clean soil are routine construction activities; installation of the ClosureTurf system is not difficult, but a certified company required - not difficult |
| Expected operational reliability of the technologies | Not applicable, no technologies used | Very reliable - ClosureTurf has operated reliably at the other installations around the country. |

| | Closure by Removal for Pond Re-use: All CCR removed | Closure-in-Place with a ClosureTurf Final Cover System: Majority of CCR removed, only de minimus amounts remain in warning layer |
|--|---|---|
| Need to coordinate with and obtain necessary approvals and permits from other agencies | Requires approval from the Illinois EPA. | Requires approval from the Illinois EPA. |
| Availability of necessary equipment and specialists | Specialists not required for excavation/hauling; specialists required to repair the geomembrane liner if needed | Specialists (certified by manufacturer) needed for installation of ClosureTurf |
| Available capacity and location of needed treatment, storage, and disposal services | Need to confirm final disposal location of warning layer (and geomembrane liner, if needed) - not expected to be a concern | Not applicable |
| Degree to which community concerns are addressed | Truck traffic - not through residential areas Groundwater impacts - none have been observed to date, none expected in the future | Truck traffic - not through residential areas Groundwater impacts - none have been observed to date, none expected in the future |
| Assessment of Impacts to Waters in the State | No impacts to Des Plaines River | No impacts to Des Plaines River |

Exhibit F:

Summary of public meetings

**Midwest Generation, LLC
Joliet 29 Generating Station
Ash Pond 2 Closure Alternatives Assessment
Public Meeting General Summary**

INTRODUCTION

In accordance with Title 35 of the Illinois Administrative Code (“35 IAC”) Section 845.240, Midwest Generation, LLC (MWG) posted the public meeting notice on the Closure Plans for Joliet 29 Generating Station’s Pond 2 on its publicly available website and provided a copy of such notice to the Illinois Environmental Protection Agency (Illinois EPA or Agency) to email to its listserv for this facility. The bilingual public meeting notice was also mailed to all residents within at least 1 mile of the facility on November 6, 2021, which totaled 4,401 residential mailing addresses. The notice was also posted in 35 public locations within 10 miles of the facility boundary.

The public meetings for Joliet 29 Generating Station’s Pond 2 were held on December 8, 2021 from 10:00 a.m. to 12:00 p.m. and on December 9, 2021 from 6:00 p.m. to 8:00 p.m. The meetings were held virtually, and participants were invited to attend via Zoom or telephone. Twelve members of the public attended the December 8th meeting, and six members of the public attended the December 9th meeting (the remaining attendees were MWG affiliate employees and consultants). Attendees who wished to sign up for a copy of the meeting summary and/or be added to Illinois EPA’s listserv for the facility were asked to sign up via a link to a Google form that was provided within the chat function of the Zoom meeting and posted on MWG’s website, midwestgenerationllc.com. Seven attendees requested a copy of the meeting summary, three of whom requested transmittal of their email address to the Agency to be added to the Agency’s listserv for the facility. It was also announced that the link would be available on MWG’s public website for two weeks. After an introduction and approximate 30-minute presentation on the proposed closure construction plan, the public was given approximately 1 hour and 15 minutes during each meeting to ask questions and provide comments.

This document serves as a summary of the issues and questions raised during the meeting.

MWG proposes to close Pond 2 by removing and disposing of the remaining warning layer (limestone and sand), decontaminating the geomembrane liner, and repurposing the pond to treat station wastewaters.

SUMMARY OF ISSUES AND QUESTIONS RAISED DURING THE MEETING

Meeting – General

Several attendees commented on the virtual format of the meeting. MWG had initially intended and even made plans to hold the public meeting in-person. But as the date of the public meeting got closer, case rates in the region were troubling, so it was decided the safest and most prudent thing to do was to hold the meetings virtually.

Groundwater

Several attendees inquired about the groundwater monitoring network and the groundwater monitoring results. The groundwater monitoring network consists of four monitoring wells: one upgradient and three downgradient. By regulation, the upgradient well must accurately reflect background groundwater quality and not be affected by the CCR surface impoundment, and downgradient monitoring wells must be placed as close to the CCR surface impoundment as possible. The wells were sampled quarterly for CCR parameters for two years starting in 2015 under the Federal CCR Rule before switching to semi-annual sampling. Quarterly monitoring resumed in April 2021, when the Part 845 rule became effective. The proposed groundwater protection standards are based on a statistical evaluation of background groundwater quality.

In response to a specific question, the proposed groundwater protection standard for chloride is 368 parts per million (ppm). There were no exceedances of proposed groundwater protection standards for any constituent during the most recent round of sampling. Monitoring Well MW-9 is not included as part of the monitoring network for Pond 2 because it is not influenced by Pond 2. It is downgradient of Pond 3, neither up nor downgradient of Pond 2.

Groundwater monitoring after closure by removal is required for at least three years after completion of closure and the results meet the requirements specified under Section 845.740(b).

Closure Costs

Questions were asked about closure costs. Lincoln Stone Quarry was included in the cost analysis for closure by removal of Pond 2 as a potential final disposal location for the warning layer and geomembrane liner. Costs were not determinative in selecting closure by removal.

Poz-o-Pac

Several questions were posed about the Poz-o-Pac material located underneath Pond 2. This material is the pond's original liner when it was constructed in the late 1970s. Poz-o-Pac is a cementitious material and has been used as a supporting surface for things like roads, highways, and parking lots (in addition to similar pozzolan-stabilized base materials). Poz-o-Pac consists of a chemically stabilized mixture of lime, fly ash, and aggregate. Fly ash reacts with hydrate lime to create a cementitious paste that holds the aggregate together, ultimately forming a concrete-like material. Accordingly, the fly ash and aggregate were encapsulated and bound together to form Pond 2's Poz-o-Pac liner and, thus, would not leach out. The Poz-o-Pac liner remains in place under the geomembrane liner at Pond 2. Groundwater monitoring shows no impacts from CCR constituents.

According to the Federal Highway Administration, Poz-o-Pac was used at over 100 sites throughout Illinois between 1955 and 1985.

Rail System

Several questions were raised about using rail to transport ash and the rail and conveyor system located at Joliet 9. When the Joliet Stations burned coal, coal was delivered via rail to the Joliet 9 Station. It would be offloaded at Joliet 9 and then transported to Joliet 29 via a conveyor system on a suspension bridge over

the Des Plaines River. The system was designed to transfer coal in one direction. It was neither designed to transfer CCR (a different material than coal) nor to move material from Joliet 29 to Joliet 9. While the rail line at Joliet 9 is still in place and available for pass through operations, the dumping and conveyor systems are no longer operational. To use the rail system at Joliet 9, new loading and unloading equipment, as well as a new conveyor system, would need to be installed, requiring extensive environmental permitting. Necessary permits include NPDES, stormwater, and air construction permits. In contrast, MWG estimates the material in Pond 2 could be completely removed in less than two weeks with trucks.

Final Disposal

Attendees questioned the final disposal location of the warning layer, and geomembrane liner if necessary. No coal ash remains in Pond 2. The warning layer, which consists of limestone and sand, remains and this is what would need to be disposed at a landfill that is permitted to accept that waste stream. Disposing of the warning layer and the liner in the Lincoln Stone Quarry was in the closure analysis as an alternative but was ultimately excluded because the Lincoln Stone Quarry is not permitted to accept Pond 2's waste streams.

Onsite Landfill

An onsite landfill was considered and ultimately ruled out because of the lengthy process of siting a new landfill, lack of available space vertically and horizontally, and obtaining the approvals needed versus the limited quantity of warning layer needing to be disposed from Pond 2. The station operates in the middle of the oblong shaped property that is approximately 238 acres. At least half, if not more, of the property is used for station operations.

Liner

Decontamination of the liner system consists of excavating the warning layer, washing down the geomembrane liner, and then taking confirmatory wipe samples (or another method if required by IEPA) of the liner. Once decontaminated, Pond 2 would be repurposed for use of treatment of station wastewaters, like stormwater, plant drains, and water purification system and sand filter backwash (for pretreatment of boiler water). The wastewaters in Pond 2 would continue to be regulated by the Station's wastewater permit.

SUMMARY OF REVISIONS, CHANGES, AND CONSIDERATIONS

Public engagement is an important part of the permitting process. Midwest Generation valued the opportunity to hear and consider the comments of community members and others who participated in the public meetings. At this time, Midwest Generation is proceeding with the proposal for closing Pond 2 by removing and disposing of the remaining warning layer (limestone and sand), decontaminating the geomembrane liner, and repurposing the pond to treat station wastewaters as presented at the public meetings. Taking public comments into consideration, the full analysis continues to indicate that the proposed plan – which remains subject to regulatory review and approval – prioritizes the environment and community well-being.