

**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.