

**CCR COMPLIANCE  
CCR FUGITIVE DUST CONTROL  
PLAN**

**Midwest Generation, LLC  
Joliet #29 Generating Station  
1800 Channahon Road  
Joliet, Illinois**

**PREPARED BY:**

KPRG and Associates, Inc.  
414 Plaza Drive, Suite 106  
Westmont, Illinois 60559

June 3, 2016

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## **1.0 INTRODUCTION**

On April 17, 2015, the United States Environmental Protection Agency published a final rule regulating coal combustion residuals (CCR) as part of 40 CFR 257 (the CCR Rule). The CCR Rule specifically requires that “the owner or operator of a CCR landfill, CCR surface impoundment, or any lateral expansion of a CCR unit adopt measures that will effectively minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities”. As a result, each regulated facility must develop a CCR fugitive dust control plan that meets the CCR Rule.

This site specific CCR Fugitive Dust Control Plan (Plan) has been developed to comply with the requirements specified in Section 257.80(b)(1-7) of the CCR Rule. In general, the Plan identifies the potential CCR fugitive dust sources subject to the CCR Rule and describes the control measures that will be implemented to minimize CCR fugitive dust emissions. The Plan also includes a procedure for the periodic assessment of the Plan’s effectiveness, documentation of any Plan amendments deemed necessary to assure continued compliance, a record of any citizen complaints received pertaining to CCR fugitive dust emissions, and an outline of the required reporting and recordkeeping requirements in the CCR Rule.

This Plan replaces the original Plan dated September 18, 2015 to reflect the operational change to a natural gas-fired electrical generating power plant from coal-fired.

## 2.0 SITE INFORMATION

### 2.1 Owner/Operator and Address:

Midwest Generation, LLC  
Joliet #29 Generating Station  
1800 Channahon Road  
Joliet, Illinois

### 2.2 Owner Representative/Responsible Person Contact Information:

Mr. William Naglosky  
Station Manager  
815-207-5412

### 2.3 Location and Description of Facility Operations

The Midwest Generation Joliet #29 Generating Station is located at 1800 Channahon Road, Joliet, Will County, Illinois. The facility is a natural gas-fired electric power generating station (formerly coal-fired) situated on approximately 297 acres located on the north side of the Des Plaines River. There are currently two operating units, identified as Units 7 and 8, on the property. Electrical power is transmitted from the site to the area grid through overhead transmission power lines.

The general vicinity includes other commercial and industrial facilities, limited residential development and agricultural areas.

### 3.0 POTENTIAL CCR FUGITIVE DUST SOURCES

As a result of the recent fuel conversion, and the correlated fact that all coal combustion ceased at the facility as of March 20, 2016, the remaining potential CCR fugitive dust sources are now limited to only Ash Pond 2 and Ash Pond 2 truck transportation routes (related to cleaning and closure of Ash Pond 2). CCR Fugitive dust could potentially be generated from these sources as a result of equipment malfunctions, wind erosion, housekeeping issues and/or the nature of the operation. Specifically, these identified sources were further evaluated to determine the probability of CCR fugitive dust being generated and to determine the level of emission controls that are warranted to mitigate CCR fugitive dust emissions. The findings of the evaluation are individually discussed in the following sections.

#### 3.1 Ash Pond 2

Now that the facility is not burning coal, Ash Pond 2 will no longer be used to store bottom ash and slag and Ash Pond 2 may be cleaned and continued to be used for non-CCR wastewaters or closed. Prior to the conversion, when the facility burned coal, Ash Pond 2 was occasionally used to store bottom ash and slag when certain operational circumstances required it. When deemed necessary, the closure of Ash Pond 2 will occur in accordance with Section 257.102 of the CCR Rule. The cleaning or closure of Ash Pond 2 will require dredging to remove the prior deposited bottom ash and slag from the pond. When cleaning or closure occurs, Ash Pond 2 will be dewatered and the dredged material allowed to dry within the pond. When the material is suitable for transport, it will be loaded into open top trucks, covered and sent off site to Lincoln Stone Quarry or another landfill for disposal. Potential CCR fugitive dust emissions could occur if dry bottom ash and slag residual is exposed or loaded during excessive windy and dry weather conditions. The final closure of Ash Pond 2 is a one-time event. When the closure of Ash Pond 2 is complete, the potential for CCR fugitive dust will no longer be present.

#### 3.2 Ash Transport Roadways

Both gravel covered and asphalt paved roads within the facility will be used by trucks hauling both bottom ash and slag to an off-site licensed landfill during the cleaning or closure of Ash Pond 2. Fugitive CCR dust emissions could occur during transit if ash material is not properly cleaned from the trucks or if there is a release of ash material from the vehicle due to a malfunction or accident.

These potential CCR fugitive dust sources are identified on the Site Diagram included in Appendix A.

## **4.0 DESCRIPTION OF CONTROL MEASURES**

### **4.1 Purpose**

The purpose of developing appropriate control measures is to minimize and reduce the emissions of CCR fugitive dust from the identified potential emission sources. The control measures and work practices implemented at the facility are described in the following sections.

### **4.2 Ash Pond 2**

During the cleaning or closure activities, Ash Pond 2 will need to be dewatered and the sediment removed to Lincoln Stone Quarry or another off-site licensed landfill. While the bottom ash and slag residue is drying, there is the potential for this material to become airborne especially during excessively dry and windy conditions. Loading of this material under these conditions also has the potential for generating CCR fugitive dust. The dewatered pond will be assessed during cleaning or closure activities during excessively dry and windy conditions. If excessive CCR fugitive dust emissions are observed from exposed dry bottom ash and slag, the height of the staged material will be minimized and the material piles will be either sprayed with water or covered to minimize CCR fugitive dust emissions. Loading activities also will be limited during such occasions. Haul trucks will be covered with tarps once they have been loaded.

### **4.3 Ash Transport Roadways**

Truck drivers are instructed on the proper procedure for cleaning trucks and a vehicle speed limit is enforced at the facility. Ash material that may not have been adequately removed from the trucks has the potential to become airborne and ultimately be deposited on haul roads. To minimize CCR fugitive dust emissions, these roads will be assessed during the cleaning or closure activities of Ash Pond 2 and any observed accumulated ash material will be promptly cleaned up and collected for off-site removal to either Lincoln Stone Quarry or another off-site licensed landfill.

## **5.0 PLAN ASSESSMENTS/AMENDMENTS**

To assure that the work practices being implemented during Ash Pond 2 cleaning or closure activities adequately control the dust from the identified potential CCR fugitive dust emission sources at the facility, routine assessments and record keeping will be performed. These procedures include the following:

### **5.1 CCR Fugitive Dust Assessments**

Pursuant to 40 CFR 257.80(b)(4), assessments of the potential CCR fugitive dust emission sources identified within this Plan will be conducted to assess the effectiveness of this Plan. The assessment will include observation of ash removal from the pond and transport activities at the facility to confirm the adequacy of the control measures. The assessments will be conducted during cleaning or closure activities by an individual designated by the contact identified in Section 2.2 of this Plan. Observations made during each assessment will be recorded on a form similar to the one included in Appendix B.

If the results of the assessment determine that the control measures are not adequate, the necessary response measures will be implemented. If the assessment finds that this Plan does not effectively minimize the CCR from becoming airborne, this Plan will be amended to include additional control measures.

### **5.2 Plan Amendments**

This CCR Fugitive Dust Plan will be reviewed whenever there is a change in conditions that would substantially affect the written Plan currently in place. A record of the reviews and any modifications or amendments made to the Plan currently in place will be kept on a form similar to the one included in Appendix C. The amended Plan will be reviewed by a Registered Professional Engineer and, if deemed acceptable, will be recertified.

### **5.3 Citizen Complaints**

Any written or verbal complaints received from a citizen involving alleged CCR fugitive dust emission events at the facility will be recorded by an individual designated by the contact identified in Section 2.2 of this Plan. The complaints will be recorded on a form similar to the one included in Appendix D. Upon receipt of the complaint, an investigation of the alleged source of the CCR fugitive dust emissions will be performed and the results of that investigation recorded on the form. If the CCR fugitive dust emission event is confirmed, any

necessary repairs or changes in operation required to mitigate the CCR fugitive dust emissions will be implemented as soon as practicable.

## **6.0 CCR FUGITIVE DUST PLAN REPORTING/RECORDKEEPING REQUIREMENTS**

This section outlines the Plan reports that must be prepared and records that must be maintained to meet the requirements specified in the CCR Rule. These requirements include the following:

- Place the Plan in the facility's operating record and publicly accessible internet site. If the Plan is amended, replace the initial Plan with the amended Plan. Only the most recent amended Plan will be maintained in the facility's operating record and internet site.
- Prepare the initial annual CCR Fugitive Dust Control Report within 14 months of the Plan's placement in the facility's operating record. The annual report will include:
  - A description of the actions taken to control CCR fugitive dust,
  - A record of all citizen complaints, and
  - A summary of any corrective measures taken.
  - Placement of the report in the operating record and publicly accessible internet site.
- Prepare on an annual basis a CCR Fugitive Dust Control Report on or before the anniversary date of the initial report submittal. The required content of these reports will include the same information required in the initial report. Place annual reports in the operating record and publicly accessible internet site.
- Provide notification to the IEPA and, if applicable, the Tribal authority when the Plan and reports are placed in the facility's operating record and publicly accessible internet site.

**7.0 PROFESSIONAL ENGINEER CERTIFICATION**

The undersigned Registered Professional Engineer is familiar with the requirements of 40 CFR 257.80 and has visited and examined the facility or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this CCR Fugitive Dust Control Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and meets the requirements of 40 CFR 257.80, and that this Plan is adequate for the facility. This certification was prepared as required by 40 CFR 257.80(b)(7).

Engineer: Thomas J. Rysiewicz

Signature: Thomas J. Rysiewicz

Date: 6/3/2016

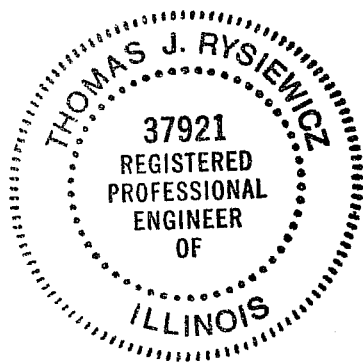
Company: KPRG and Associates, Inc.

Registration State: Illinois

Registration Number: 062.037921

License Expiration Date: November 30, 2017

Professional Engineer Stamp:



**APPENDIX A**

**SITE DIAGRAM**

**POTENTIAL CCR FUGITIVE DUST**

**SOURCES**



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0  600'  
APPROXIMATE SCALE

ENVIRONMENTAL CONSULTATION & REMEDIATION

**K P R G**

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SITE DIAGRAM/CCR FUGITIVE DUST SOURCES

JOLIET #29 GENERATING STATION  
JOLIET, ILLINOIS

Scale: 1" = 600'

Date: June 3, 2016

KPRG Project No. 15315

APPENDIX A

**APPENDIX B**  
**ASSESSMENT RECORD**

# APPENDIX B

## JOLIET #29 STATION

# ASSESSMENT RECORD

Date	Inspector	Unit Inspected (See Key Below)	Maintenance/Cleanup Required (yes/no)	Response Action Performed (completion date)	Inspector Signature

Unit Key:

1 - Ash Pond 2

2 - Ash Roadways

## **APPENDIX C**

# **PLAN REVIEW AND AMENDMENT RECORD**



**APPENDIX D**

**CITIZEN COMPLAINT LOG**

