

Annual CCR Fugitive Dust Control Report
Joliet #29 Generating Station
1800 Channahon Road, Joliet, Illinois

1.0 Introduction

On December 19, 2014, the administrator of the U.S. Environmental Protection Agency signed the Disposal of Coal Combustion Residuals (CCR) from Electric Utilities final rule (the Rule). The Rule was published in the Federal Register on April 17, 2015 and became effective on October 19, 2015. The Rule establishes a comprehensive set of requirements for the disposal of CCR in landfills and surface impoundments at coal-fired power plants under Subtitle D of the Resource Conservation and Recovery Act. These requirements include compliance with location restrictions, design criteria, operating criteria, groundwater monitoring and corrective action, and closure and post-closure care aspects. The operating criteria include air criteria specified in Title 40 of the Code of Federal Regulations, §257.80, to address the potential pollution caused by windblown dust from CCR units.

The Joliet #29 Generating Station, operated by Midwest Generation, LLC (MWG), 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. The Rule applies to this facility due to the management of CCR that is generated from the combustion of coal. The CCR unit associated with the station is Ash Pond 2.

According to the Rule, owners or operators of CCR units must adopt measures that will effectively minimize CCR from becoming airborne at the facility by developing and operating in accordance with a Fugitive Dust Control Plan (Plan) with adequate dust control measures. In this regard, a Plan was prepared to comply with the requirements as specified in §257.80(b)(1-7) of the Rule and placed in the Joliet facility's operating record on October 19, 2015 per §257.105(g)(1). As required, the Plan was also noticed to the State Director per §257.106(g)(1) and posted to the publicly accessible internet site per §257.107(g)(1). The September 18, 2015 Initial CCR Fugitive Dust Control Plan was updated on June 3, 2016 to reflect the operational change to a natural gas-fired electrical generating power plant from coal-fired.

In addition to the above and per §257.80(c), an Annual Fugitive Dust Control Report (Annual Report) must be completed that includes the following:

- Description of actions taken to control CCR fugitive dust
- Record of all citizen complaints
- Summary of any corrective actions taken

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The Annual Report must be completed no later than one year after completion and placement of the previous Report in the facility's operating record. This document represents the 2017 Annual Report for Joliet and will also be appropriately placed in the facility's operating record per §257.105(g)(2), noticed to the State Director per §257.106(g)(2), and posted to the publicly accessible internet site per §257.107(g)(2).

2.0 Actions Taken to Control CCR Fugitive Dust

As detailed in the Plan and reiterated below, the station has established procedures and inspection requirements which are implemented to minimize/eliminate airborne emissions from the potential fugitive dust sources. The results from inspections conducted and associated observations made during CCR handling activities are documented on logs maintained in the station's Environmental Department, including those specific to the one-year period (November 2016 to November 2017) relevant to this Annual Report. It is further acknowledged that, the Joliet station added natural gas as a firing source for the boilers and effectively ceased coal fuel use at the facility as of March 20, 2016, although this capability is retained. As such, no generation of CCR materials occurred during this period. Sources of CCR are now limited to only CCR contained in Ash Pond 2 and the Ash Pond 2 truck transportation routes (related to cleaning and closure of Ash Pond 2).

2.1 Ash Pond 2

No cleaning or closure activities occurred during this period.

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.

2.2 Transport Roadways

No loading or transportation of CCR occurred during this period.

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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 is promptly cleaned up and collected for off-site removal to either Lincoln Stone Quarry or another off-site licensed disposal facility.

3.0 Fugitive CCR Dust Assessments

Pursuant to 40 CFR 257.80(b)(4), assessments of the potential fugitive dust emission sources identified in the Joliet facility's CCR Fugitive Dust Control Plan (Plan) are conducted to assess the effectiveness of the Plan. The assessment includes observation of ash removal from the pond, temporary storage and transport activities at the facility to confirm the adequacy of the control measures. If assessments are warranted, they are conducted on a quarterly basis by an individual designated by the contact identified below. Observations made during each assessment are recorded on a form similar to the one included in Appendix B of the Joliet facility's CCR Fugitive Dust Control Plan. No assessments were warranted during this period.

If the results of the assessment determine that ash-related equipment has malfunctioned or the integrity of the equipment has been compromised, the necessary repairs or replacement are performed as soon as feasible. If the assessment finds that the Plan does not effectively minimize the CCR from becoming airborne, the Plan is amended to include additional control measures.

No issues were identified during this Annual Report's period of record covering November 2016 through November 2017.

Owner Representative/Responsible Person Contact Information:

Mr. William Naglosky
Station Manager
815-207-5412

4.0 Record of Citizen Complaints

Per the Rule, the Annual Report must include a record of all citizen complaints that were received by the Joliet station with regard to fugitive dust emission incidents. In line with established protocols and within 24 hours of receipt, the station's environmental coordinator enters the citizen complaint into MWG's Environmental Management Information System

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(EMIS) database. The EMIS database would then automatically forwards notice of the complaint to the station manager, MWG's regional environmental manager, and corporate environmental department. Following initial evaluation of the complaint, MWG would then conducts a thorough investigation to confirm the reported incident/conditions and implement corrective actions as may be warranted.

No complaints were registered during this Annual Report's period of record covering November 2016 through November 2017.

5.0 Summary of Corrective Actions Taken

For the November 2016 to November 2017 period of record, and based on continued monitoring and inspections as outlined in Section 2.0 and 3.0 and as required under the CCR rules, the established control measures remain effective in minimizing potential fugitive dust emissions. Moreover, this assertion is further validated by the lack of citizen complaints logged over this same period. Accordingly, no corrective actions were undertaken during the past year, either as a result of internally identified deficiencies or from resolution of citizen complaints.