

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 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 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 electric generating 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 that complies 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 2020 Annual Report for Joliet 29 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 2019 to November 2020) relevant to this Annual Report. The Joliet station converted the generating boilers to fire natural gas as a fuel source and ceased coal fuel use at the facility on March 20, 2016. As such, no generation of CCR materials occurred during the reporting period. As described below, there is no CCR remaining at Joliet 29 Station above de minimis quantities.

2.1 Ash Pond 2

Removal of ash from Ash Pond 2 was completed on November 22, 2019 so that Ash Pond 2 only contains a de minimis quantity of ash, ash remaining in the interstitial spaces in the pond warning layer. The warning layer is comprised of sand and limestone. Upon completion of removal of ash from Ash Pond 2, the geomembrane liner was inspected. Because of Illinois Public Act 101-171, signed into law on July 30, 2019, closure activities cannot be completed until a permit is obtained from the Illinois Environmental Protection Agency.

2.2 Transport Roadways

During removal of the CCR, truck drivers were 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, the roads were assessed during the cleaning activities of Ash Pond 2, and any observed accumulated ash material was promptly cleaned up and collected for off-site removal to either Lincoln Stone Quarry or another off-site licensed disposal facility.

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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) were 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 were warranted, they were conducted on a quarterly basis by an individual designated by the contact identified below. Observations made during each assessment are to be 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.

No issues were identified during this Annual Report's period of record covering November 2019 through November 2020.

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 (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 2019 through November 2020.

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5.0 Summary of Corrective Actions Taken

For the November 2019 to November 2020 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.