Annual CCR Fugitive Dust Control Report
Joliet #9 Generating Station
1601 South Patterson 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 #9 Generating Station, operated by Midwest Generation, LLC (MWG), is located at 1601 South Patterson Road, Joliet, Will County, Illinois. The facility consists of a natural gas-fired electric power generating station (formerly coal-fired) situated on approximately 170 acres and the associated Lincoln Stone Quarry (LSQ) occupying approximately 120 acres, each are located on the south side of the Des Plaines River. The Station has one generating unit, identified as Unit 6. Lincoln Stone Quarry includes a former ash placement site referred to as the West Filled Area that ceased receiving CCR prior to 1994 and the Main Quarry which is used as an impoundment under the CCR Rules, but permitted as a landfill by IEPA for bottom ash and slag and is anticipated to cease receiving CCR when Ash Pond 2 at Joliet #29 is cleaned or closed. Lincoln Stone Quarry may remain open to allow for the beneficial reuse of slag. 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 the LSQ Main Quarry.

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 Lincoln Stone Quarry 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

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 LSQ 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 CCR Fugitive Dust Control Plan (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. As a result of the 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 truck transportation routes (related to cleaning or closure of Ash Pond 2, which is located at the Joliet Station #29 facility to the north of Joliet Station #9), the placement in LSQ, and closure of LSQ.

2.1 Lincoln Stone Quarry

Prior to the 2016 fuel conversion of Joliet #9 and Joliet #29 to Natural Gas, LSQ used to receive bottom ash and slag from both generating stations. Future disposal of ash is anticipated to be a onetime event that may occur at the time Joliet #29 Ash Pond 2 is cleaned or closed. Ash in the Main Quarry is approximately 40 feet below grade and is confined by the quarry walls and, therefore, not readily susceptible to wind erosion and generation of potential CCR fugitive dust emissions. Loading of the moisture laden slag to be used as a beneficial material is also performed within the Main Quarry at a level well below grade. Therefore, the loading operation

is also not susceptible to wind erosion. The ash in the West Filled Area lies beneath a vegetated soil cover which mitigates any wind erosion impacts and the potential for CCR fugitive dust emissions.

Operation of the Main Quarry and West Filled Area is performed in accordance with the conditions of the state issued permit, No. 1994-241-LFM, dated August 14, 2015, Modification No. 21. The issued permit includes the requirement to control dust to prevent wind dispersal of particulate matter off site. Additionally, the permit requires quarterly inspections of the West Filled Area and requires repair of erosion and scoured channels observed during the inspection.

3.0 Fugitive CCR Dust Assessments

Pursuant to 40 CFR 257.80(b)(4), assessments of the potential fugitive dust emission sources identified in LSQ facility's CCR Fugitive Dust Control Plan (Plan) are conducted to assess the effectiveness of the Plan. The assessment includes observation of ash removal 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 LSQ facility's CCR Fugitive Dust Control Plan. No assessments were deemed necessary in the past year based on the weekly CCR impoundment inspections and lack of changes to operations at these units

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 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 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 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 currently 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.