MWG
Midwest Generation, LLC

Midwest Generation, LLC

Joliet 9 Generating Station

Documentation of Public Meeting

35 Ill. Adm. Code Sections 845.240(d) and 845.800(d)(2)

Midwest Generation, LLC's (MWG) Joliet 9 Generating Station (Joliet 9 Station) is located at 1601 South Patterson Road in Joliet, Illinois. Joliet 9 Station operates the Lincoln Stone Quarry, a permitted landfill. Because the location of Lincoln Stone Quarry is designated as a potential area of environmental justice concern in the Illinois Environmental Protection Agency's (Agency) EJ Start screening tool, MWG is submitting a construction permit application for closure to the Agency by February 1, 2022.

Pursuant to Section 845.240, MWG held two public meetings on the tentative application and as required by subsection (d) of that section, MWG is placing documentation of the meeting in its operating record consisting of the following Exhibits:

Exhibit A:	Public Notice (November 5, 2021)
Exhibit B:	Map of 2-mile radius of impoundment (selected postal routes highlighted blue) and USPS Every Door Direct Mail forms
Exhibit C:	Posting of notice in conspicuous locations within 10 miles of the facility
Exhibit D:	Letter to Illinois EPA requesting notice be sent to listserv for MWG
Exhibit E:	Presentation for December 8 and 9, 2021 public meetings
Exhibit F:	Summary of public meetings

Exhibit A:

Public Notice (November 5, 2021)

MWG
Midwest Generation, LLC

Public Notice

Midwest Generation to Host Public Meetings on Closure Plans for Joliet's Lincoln Stone Quarry

PRSRT STD
ECRWSS
U.S. POSTAGE
PAID
EDDM RETAIL

**** ECRWSS EDDM **

Postal Customer

What: Midwest Generation is hosting two public meetings to share information and engage with the community about its proposed plans to close the Lincoln Stone Quarry, consistent with state and federal environmental regulations. The Joliet Station no longer generates power from coal and no longer produces coal ash. MWG is proposing to close the quarry through capping and long-term monitoring. MWG anticipates filing a construction permit application with the State of Illinois in February 2022. Following a presentation at the meetings, participants will have the opportunity to participate in a question-and-answer session. Spanish translation will be available.

When: Dec. 8, 2021, 6 p.m. to 8 p.m. CT
Dec. 9, 2021, 10 a.m. to 12 p.m. CT

Where: Due to COVID-19 restrictions, meetings will be virtual. Visit **midwestgenerationllc.com** on or after **Nov. 8, 2021** for information on how to participate. Participants can also dial in by phone during designated meeting times using the phone number **312.626.6799** and Meeting ID **813 3905 0675.**

Information on closure construction permit applications will be posted at **midwestgenerationllc.com** no later than **Nov. 8, 2021.** Contact: **midwestgeneration@nrg.com**

MWG
Midwest Generation, LLC

Notificación Pública

Midwest Generation organizará reuniones públicas sobre los planes de cierre de la cantera Lincoln Stone de Joliet

PRSRT STD
ECRWSS
U.S. POSTAGE
PAID
EDDM RETAIL

**** ECRWSS EDDM **

Postal Customer

Que: Midwest Generation organizará dos reuniones públicas para compartir información e interactuar con la comunidad sobre sus planes propuestos para cerrar la cantera Lincoln Stone, de acuerdo con las regulaciones ambientales estatales y federales. La estación de Joliet ya no genera energía a partir del carbón y ya no produce cenizas de carbón. MWG propone cerrar la cantera mediante el sellado y el monitoreo a largo plazo. MWG anticipa presentar una solicitud de permiso de construcción al Estado de Illinois en febrero de 2022. Luego de la presentación en las reuniones, los participantes tendrán la oportunidad de participar en una sesión de preguntas y respuestas. Se facilitará traducción al español.

Cuando: 8 de dic. de 2021, de 6 p.m. a 8 p.m. CT
9 de dic. de 2021, de 10 a.m. a 12 p.m. CT

Donde: Debido a las restricciones por COVID-19, las reuniones serán virtuales. Visite **midwestgenerationllc.com** el **8 de nov. de 2021** o después de esa fecha para conocer más información sobre cómo participar. Los participantes también pueden participar mediante llamada telefónica durante tiempos designados de la reunión a través del número **312.626.6799** y ID de reunión **813 3905 0675.**

La información sobre las solicitudes de permisos de construcción de cierre se publicará en **midwestgenerationllc.com** a más tardar el **8 de nov. de 2021.** Contacto: **midwestgeneration@nrg.com**

MWG
Midwest Generation,LLC

Public Notice

Midwest Generation to Host Public Meetings on Closure Plans for Joliet's Lincoln Stone Quarry

What: Midwest Generation is hosting two public meetings to share information and engage with the community about its proposed plans to close the Lincoln Stone Quarry, consistent with state and federal environmental regulations. The Joliet Station no longer generates power from coal and no longer produces coal ash. MWG is proposing to close the quarry through capping and long-term monitoring. MWG anticipates filing a construction permit application with the State of Illinois in February 2022. Following a presentation at the meetings, participants will have the opportunity to participate in a question-and-answer session. Spanish translation will be available.

When: Dec. 8, 2021, 6 p.m. to 8 p.m. CT
Dec. 9, 2021, 10 a.m. to 12 p.m. CT

Where: Due to COVID-19 restrictions, meetings will be virtual. Visit **midwestgenerationllc.com** on or after **Nov. 8, 2021** for information on how to participate. Participants can also dial in by phone during designated meeting times using the phone number **312.626.6799** and Meeting ID **813 3905 0675.**

Information on closure construction permit applications will be posted at **midwestgenerationllc.com** no later than **Nov. 8, 2021.**
Contact: **midwestgeneration@nrg.com**

MWG
Midwest Generation,LLC

Notificación Pública

Midwest Generation organizará reuniones públicas sobre los planes de cierre de la cantera Lincoln Stone de Joliet

Que: Midwest Generation organizará dos reuniones públicas para compartir información e interactuar con la comunidad sobre sus planes propuestos para cerrar la cantera Lincoln Stone, de acuerdo con las regulaciones ambientales estatales y federales. La estación de Joliet ya no genera energía a partir del carbón y ya no produce cenizas de carbón. MWG propone cerrar la cantera mediante el sellado y el monitoreo a largo plazo. MWG anticipa presentar una solicitud de permiso de construcción al Estado de Illinois en febrero de 2022. Luego de la presentación en las reuniones, los participantes tendrán la oportunidad de participar en una sesión de preguntas y respuestas. Se facilitará traducción al español.

Cuando: 8 de dic. de 2021, de 6 p.m. a 8 p.m. CT
9 de dic. de 2021, de 10 a.m. a 12 p.m. CT

Donde: Debido a las restricciones por COVID-19, las reuniones serán virtuales. Visite **midwestgenerationllc.com** el **8 de nov. de 2021** o después de esa fecha para conocer más información sobre cómo participar. Los participantes también pueden participar mediante llamada telefónica durante tiempos designados de la reunión a través del número **312.626.6799** y ID de reunión **813 3905 0675.**

La información sobre las solicitudes de permisos de construcción de cierre se publicará en **midwestgenerationllc.com** a más tardar el **8 de nov. de 2021.** Contacto: **midwestgeneration@nrg.com**

Exhibit B:

Map of 2-mile radius of impoundment - selected postal routes highlighted blue

Step 1: **Search for Routes**

Use the EDDM® Online Tool to search for neighborhoods where your customers live. Then, use the filters to target customers by specific demographics such as age, household size, and income.

Search for Routes

1601 South Patterson Road, Joliet, IL 60436

Radius

2 mi

Search

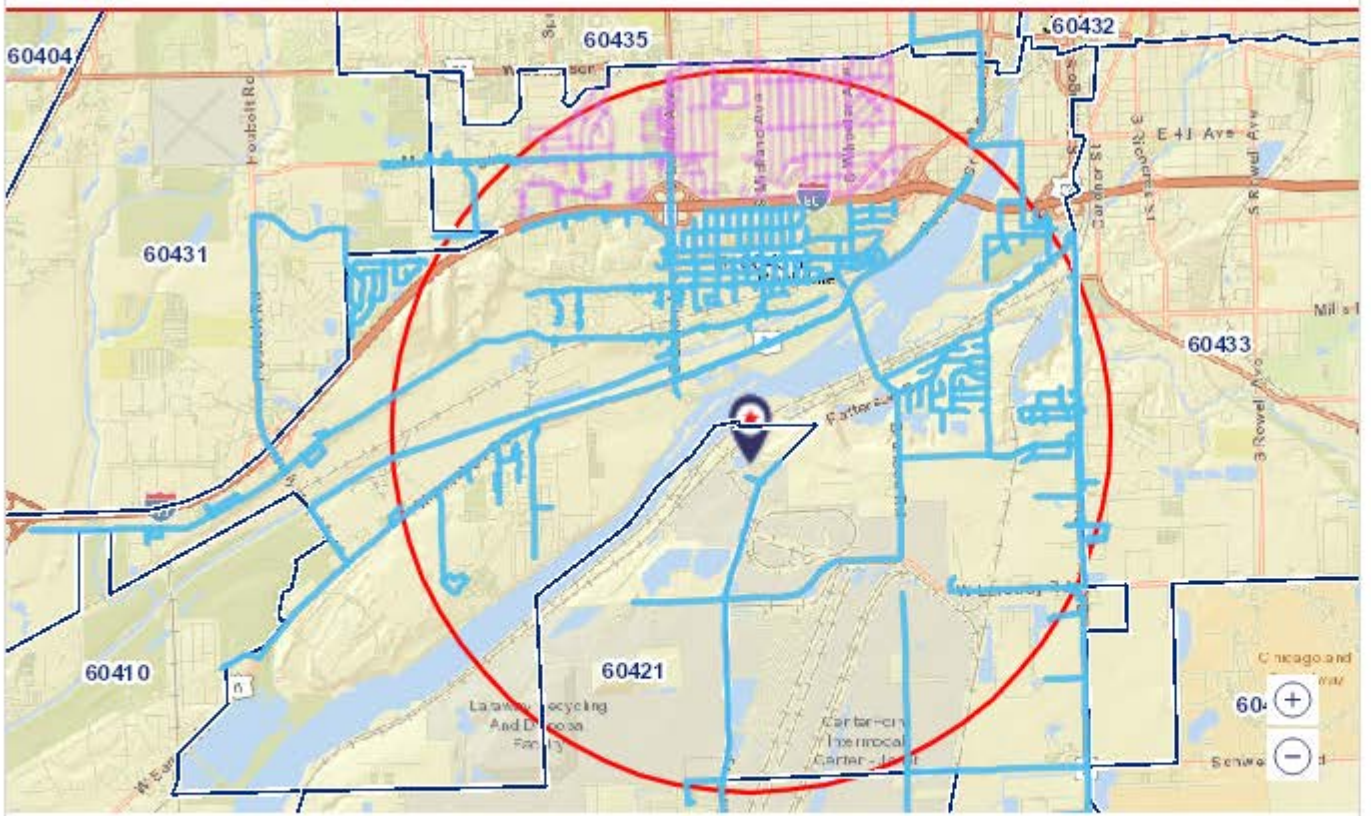
Clear

Mailpiece Size Checker

Refine Search

View as: Map Table

Route	Residential	Total	Age: 25-34	Size	Income	Cost
–	–	–	–	–	–	–



Map Key

Show

Order Summary

Selected Routes

5

Post Office™ Drop-Offs

1

Total Mailpieces

2218

Approximate Cost ⓘ

$443.60

Next Step

Clear Routes

POST OFFICE LOCATIONS AND DROP INFORMATION

Information provided below identifies the Post Office retail units that service the ZIP Codes and routes included in your mailing. Each mailing must be taken to the specified Post Office retail unit as indicated below for processing at the discount postage rate.

1 JOLIET
2000 MCDONOUGH ST
JOLIET, IL 60436

Phone:
(815) 773-1060
Fax: (815) 773-1079
800-ASK-USPS

Retail Business Hours

M	T	W	Th	F	Sa	Su
08:00AM	08:00AM	08:00AM	08:00AM	08:00AM	08:00AM	
05:30PM	05:30PM	05:30PM	05:30PM	05:30PM	02:00PM	Closed

ZIP Code	Route	Mailpieces	ZIP Code	Route	Mailpieces	ZIP Code	Route	Mailpieces
60436	C011	585	60436	C082	429	60436	C012	358
60436	R012	451	60432	R030	395			
Total Mailpieces: 2218			**Approximate Cost: $443.60**					

United States Postal Service

Every Door Direct Mail (EDDM) Retail®

Post Office: Note Mail Arrival Date & Time
(Do Not Round Stamp)

Mailer

Name and Address of Individual or Organization for Which Mailing is Prepared	Telephone	Name and Address of Mailing Agent *(If other than mailer)*	Telephone
MINUTEMAN PRESS JOLIET 1400 ESSINGTON RD JOLIET, IL, 60435 Customer Registration I.D. (CRID) 7466450	(815) 582-4014	Customer Registration I.D. (CRID) _____	

Mailing

Post Office of Mailing	Processing Category	Mailer's Mailing Date	Total # of Bundles	Total # of Pieces per Bundle
JOLIET	☑ EDDM Flats	11/06/2021		

Type of Postage	Delivery Type	Weight of a Single Piece	Every Door Direct Mail Barcode
☐ EDDM Retail Indicia ☐ Metered ☐ Meter Strip	Residential	__ . __ ounces Max Weight 3.3 ounces	1100000000007466450000000828139802218 13
	Route Type(s) Rural,CTY	Incentive/Discount Claimed	

Entry	Price Category	Price	No. of Pieces	Subtotal Postage	Incentive/Discount Amount	Total Postage	Status
DDU	Saturation	0.200	2,218	$443.60		$443.60	PAID ONLINE

Affix Meter Strip Here

Certification

The mailer's signature certifies acceptance of liability for and agreement to pay any revenue deficiencies assessed on this mailing, subject to appeal. If an agent signs this form, the agent certifies that he or she is authorized to sign on behalf of the mailer and that the mailer is bound by the certification and agrees to pay any deficiencies. In addition, agents may be liable for any deficiencies resulting from matters within their responsibility, knowledge, or control. The mailer hereby certifies that all information furnished on this form is accurate, truthful, and complete; that the mail and the supporting documentation comply with all postal standards and the mailing qualifies for the prices and fees claimed; and that the mailing does not contain any matter prohibited by law or postal regulation. I understand that anyone who furnishes false or misleading information on this form or who omits information requested on this form may be subject to criminal and/or civil penalties, including fines and imprisonment.

Privacy Notice: For information regarding our Privacy policy visit *www.usps.com*

Signature of Mailer or Agent	Printed Name of Mailer or Agent Signing Form	Telephone

Acceptance USPS Use Only

Postmaster: Report Total Postage in AIC 207	Subtotal Postage	Incentive/Discount Amount
Weight of a Single Piece _____ . _____ ounces	Total Number of Pieces	Total Postage
USPS Acceptance Employee Signature		Round Date *(Required)* Payment Date
USPS Acceptance Employee Printed Name		

Acceptance USPS Use Only

Verification USPS Use Only

Number of Bundles	Any postage figures adjusted from mailer's entries? If yes, reason: ☐ Yes ☐ No	
		Round Date *(Required)* Verification Date
I CERTIFY that this mailing has been inspected for each item below if required: (1) eligibility for postage prices claimed; (2) proper preparation *(and presort where required);* (3) proper completion of postage statement.	Date Mailer Notified / Contact	
	By *(Initials)* / Time AM PM	
USPS Verification Employee Signature	Print USPS Verification Employee Printed Name	

Verification USPS Use Only

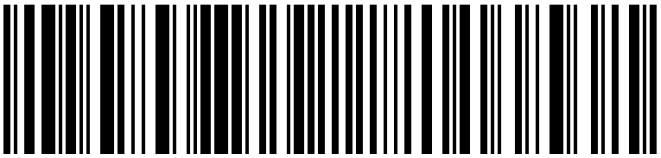
EVERY DOOR DIRECT MAIL RETAIL®

5-Digit ZIP Code	Route Number	# of Mailpieces	5-Digit ZIP Code	Route Number	# of Mailpieces
60432	R030	395			
60436	C011	585			
60436	C012	358			
60436	C082	429			
60436	R012	451			

EVERY DOOR DIRECT MAIL - RETAIL™
FACING SLIP

Mailer Information
Company Name: MINUTEMAN PRESS JOLIET
Post Office of Mailing: JOLIET

USPS TRACKING #



9309 9899 5550 0000 0359 5973 79

5-Digit ZIP Code (Required):	Route Number (Required):	Delivery Type:
60432	R030	Residential
Date:	**Total # of Mailpieces per Bundle:**	**Total # of Bundles*:** _____ of _____

Do Not Deliver Address	Do Not Deliver Address

EDDM Mail Description	

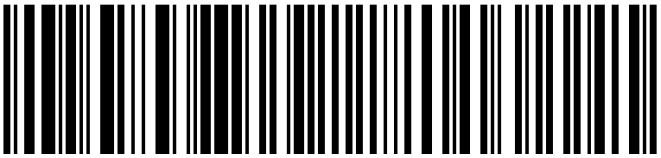
** Mailers must prepare bundles to comply with standards*

Generated by USPS -- Every Door Direct Mail - Retail Facing Slip

EVERY DOOR DIRECT MAIL - RETAIL™
FACING SLIP

Mailer Information
Company Name: MINUTEMAN PRESS JOLIET
Post Office of Mailing: JOLIET

USPS TRACKING #



9309 9899 5550 0000 0359 5973 31

5-Digit ZIP Code (Required):	Route Number (Required):	Delivery Type:
60436	C011	Residential
Date:	**Total # of Mailpieces per Bundle:**	**Total # of Bundles*:** _____ of _____

Do Not Deliver Address	Do Not Deliver Address

EDDM Mail Description	

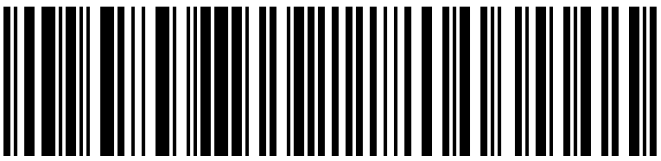
** Mailers must prepare bundles to comply with standards*

Generated by USPS -- Every Door Direct Mail - Retail Facing Slip

EVERY DOOR DIRECT MAIL - RETAIL™
FACING SLIP

Mailer Information
Company Name: MINUTEMAN PRESS JOLIET
Post Office of Mailing: JOLIET

USPS TRACKING #



9309 9899 5550 0000 0359 5973 55

5-Digit ZIP Code (Required):	Route Number (Required):	Delivery Type:
60436	C012	Residential
Date:	**Total # of Mailpieces per Bundle:**	**Total # of Bundles*:** _____ of _____

Do Not Deliver Address	Do Not Deliver Address

EDDM Mail Description	

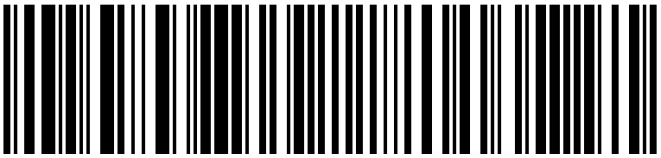
** Mailers must prepare bundles to comply with standards*

Generated by USPS -- Every Door Direct Mail - Retail Facing Slip

EVERY DOOR DIRECT MAIL - RETAIL™
FACING SLIP

Mailer Information
Company Name: MINUTEMAN PRESS JOLIET
Post Office of Mailing: JOLIET

USPS TRACKING #



9309 9899 5550 0000 0359 5973 48

5-Digit ZIP Code (Required):	Route Number (Required):	Delivery Type:
60436	C082	Residential
Date:	**Total # of Mailpieces per Bundle:**	**Total # of Bundles*:** _____ of _____

Do Not Deliver Address	Do Not Deliver Address

EDDM Mail Description	

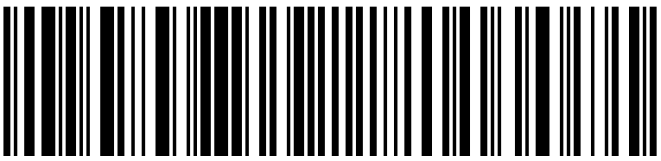
** Mailers must prepare bundles to comply with standards*

Generated by USPS -- Every Door Direct Mail - Retail Facing Slip

EVERY DOOR DIRECT MAIL - RETAIL™
FACING SLIP

Mailer Information
Company Name: MINUTEMAN PRESS JOLIET
Post Office of Mailing: JOLIET

USPS TRACKING #



9309 9899 5550 0000 0359 5973 62

5-Digit ZIP Code (Required):	Route Number (Required):	Delivery Type:
60436	R012	Residential
Date:	**Total # of Mailpieces per Bundle:**	**Total # of Bundles*:** _____ of _____

Do Not Deliver Address	Do Not Deliver Address

EDDM Mail Description	

** Mailers must prepare bundles to comply with standards*

Generated by USPS -- Every Door Direct Mail - Retail Facing Slip

Exhibit C:

Posting of notice in conspicuous locations within 10 miles of the facility

MWG Canvass Summary

December 2021

To meet Section 845.240 Pre-Application Public Notification and Public Meeting regulation:

Post the notice in conspicuous locations throughout villages, towns, or cities within 10 miles of the facility, or use appropriate broadcast media (such as radio or television);

Joliet 29 and Joliet 9

We identified and contacted via telephone a total of **70 locations** within 10 miles of the facility in the City of Joliet. The first day of outreach was Friday, November 5, 2021. The second day of outreach was Tuesday, November 23, 2021. In the instances where we were not able to post a notice, the facilities were closed or refused.

The bilingual public meeting notices were placed at **35 locations**, including:

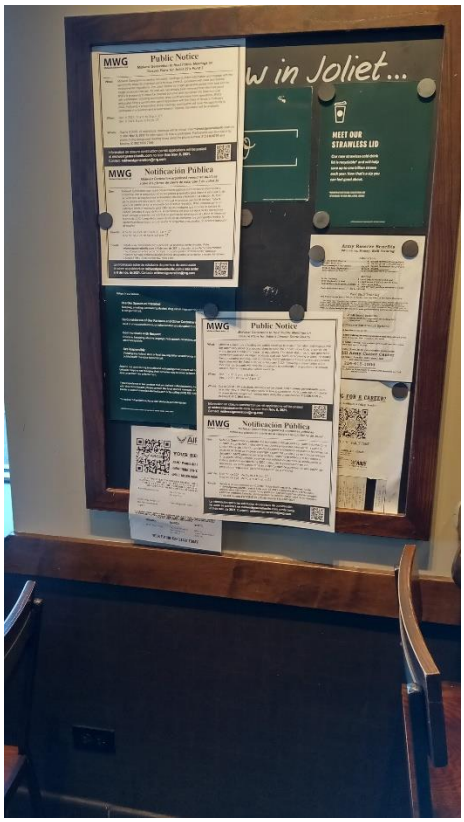
- Joliet Public Library, Black Road Branch
- Will County Circuit Clerk
- Will County Law Library
- Amtrak Station, Joliet
- Spanish Community Center
- Joliet Train Station
- Mitchell's Food Mart
- Jewel-Osco (Larkin Ave)
- Jewel-Osco (Jefferson St)
- Fellowship Bible Church
- St. George Church Sanctuary
- Village of Rockdale
- Manhattan-Elmwood Public Library District
- White Oak Library District: Romeoville Branch
- Romeoville Village Hall
- Lewis University Library
- New Lenox Public Library District
- New Lenox Village Hall
- White Oak Library District: Crest Hill Branch
- Village of Oswego
- Shorewood-Troy Public Library
- Shorewood Village Hall
- Three Rivers Public Library District
- Starbucks (x5)
- St. John Missionary Baptist
- Restoration Christian Church
- Dollar General

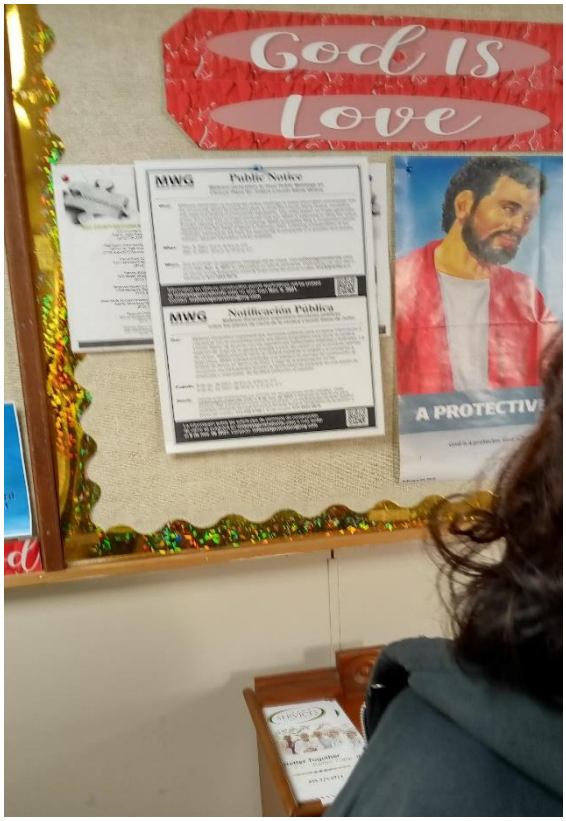
- Walgreens
- Second Baptist Church
- Manhattan Village Hall
- Willow Falls Senior Living

Twenty-one locations refused or were closed, including:

- Messiah Lutheran Church
- Friendship Baptist Church
- Old Central Church
- St. Patrick's Church
- Church of God Joliet South
- All Nations Church of God in Christ
- Plainfield Public Library District
- Grace Bible Church
- Plainfield Village Administration
- LaVerne and Dorothy Brown Library
- Mosaic Community Church
- USPS (x2)
- Dunkin (x2)
- Jewel-Osco (x2)
- Harrah's
- Super Mercados El Guiro
- Food 4 Less
- Walmart

Joliet Pictures


w in Joliet...
MWG
Public Notice
MWG
Notificación Pública
MEET OUR
STRAWLESS LID


God IS
love
MWG
Public Notice
MWG
Notificación Pública
A PROTECTIV

###

Exhibit D:

Submittal to Illinois EPA requesting notice be sent to listserv for MWG

MWG
Midwest Generation, LLC

Midwest Generation, LLC
Joliet Generating Station
1800 Channahon Road
Joliet, Illinois 60436

November 5, 2021

VIA CERTIFIED MAIL
Illinois Environmental Protection Agency
DWPC – Permits MC #15
Attn: Part 845 Coal combustion Residual Rule Submittal
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Re: Joliet 9 Generating Station – Joliet, Will County, Illinois
Facility ID No. W1970450046
Notice of Public Meeting for CCR Construction Permit Application

Dear Sir or Madam:

In accordance with the requirements of 35 IAC Section 845.240(b), please find enclosed the public meeting notice for Lincoln Stone Quarry (ID No. W1970450046-01) at Joliet Generating Station. These meetings are being held in anticipation of submittal of closure construction permit applications on the schedule provided in 35 IAC 845.700(h)(1).

Midwest Generation, LLC requests that the Agency email this notice to the Agency's listserv for the facility. An electronic copy of this notification has been submitted to the Agency's CCR Coordinator.

For reasons stated in prior submittals and in discussions with Illinois EPA staff, Midwest Generation, LLC ("MWG") continues to dispute that the Lincoln Stone Quarry at Joliet 9 Station is a CCR surface impoundment as defined in the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/3.143. Nevertheless, while MWG maintains that the Lincoln Stone Quarry as a landfill under Illinois law, and during pendency of that dispute, MWG intends to comply with 35 IAC Part 845 requirements for Lincoln Stone Quarry. MWG expressly reserves all rights and defenses related to the Lincoln Stone Quarry, which MWG maintains does not qualify as a "CCR surface impoundment" as defined in the Act.

If you have any questions or require additional information regarding this submittal, please contact me at [redacted]

Sincerely,

Sharene Shealey

Director, Environmental

CC via Email: Illinois EPA CCR Coordinator
William Naglosky, Joliet Station Plant Manager
DeAndre Cooley, Joliet Station Environmental Specialist
Jill Buckley, Environmental Manager

Exhibit E:

Presentation for December 8 and 9, 2021 public meetings

MWG

Midwest Generation LLC.

Lincoln Stone Quarry
ID No. W1970450046-01

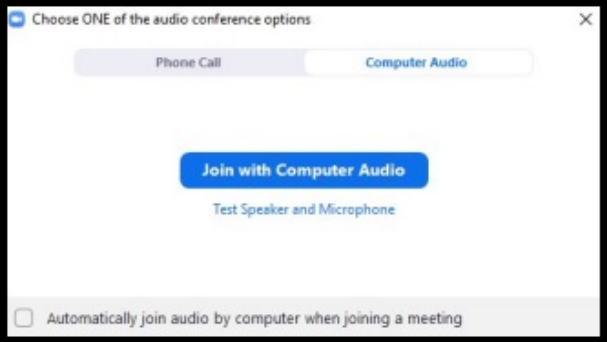
Proposed Closure Construction Project

December 2021

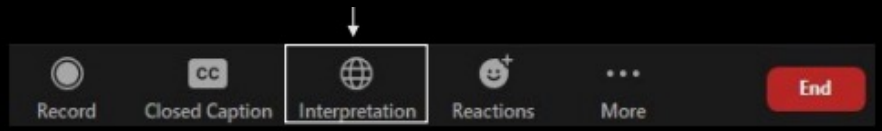
Interpretación en Zoom: Computadora

Instrucciones Para la Audiencia Para Interpretación en Zoom

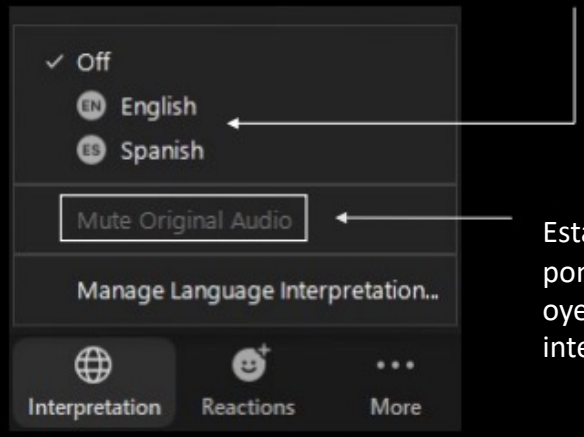
1. Seleccione unirse a la llamada con el audio de la computadora.



2. Seleccione el Globo “Interpretación” en la parte inferior izquierda de la pantalla.



3. Seleccione el idioma en que desea escuchar la interpretación.



Esta opción desactiva la voz del ponente, para que así el oyente solo escuche la interpretación.

interprenet

Safety Message

COVID-19 PRECAUTIONS

- Holding this meeting virtually due to the COVID-19 pandemic

- Participants in Q and A portion will be following CDC protocols
  - Social Distancing
  - Wearing masks
    - Will pull down masks only to speak

Virtual Meeting Reminders

In today's meeting, you can:

Enter questions in "Chat"

Click the chat icon on your screen and type your question

Participate in a live Q&A session

Verbal questions will be taken. After our presentation, we will provide instructions for the live Q&A.

Sign up for a post-meeting summary and IEPA listserv

During the meeting, click the link that Midwest Generation, LLC has placed in the Chat to complete the Google form.

Public Website: midwestgenerationllc.com

MWG
Midwest Generation LLC.

Meeting Agenda

- Illinois Coal Ash & Other Environmental Rules
- Joliet Generating Station Background
- Closure Alternatives Analysis and Groundwater Modeling
- Proposed Closure and Post-Closure Plan
- Question & Answer Session

MWG
Midwest Generation LLC.

Illinois Coal Ash Rules & Other Regulations

- In 2015, the US EPA finalized the Federal CCR Rules to regulate coal ash landfills and surface impoundments at power plants.
- In 2019, the state passed a law to regulate coal ash stored in CCR surface impoundments at power plants throughout Illinois.
  - The law required that the Illinois Environmental Protection Agency propose, and that the Illinois Pollution Control Board adopt, state regulations for storage and disposal of coal ash produced from electric generating facilities through a new permitting program.
- As required by the law, the Illinois EPA and the Board undertook a public rulemaking process that resulted in the Board adopting regulations at *35 IAC Part 845 – Standards for the Disposal of Coal Combustion Residuals in Surface Impoundments* (the Illinois Coal Ash Rules) in April 2021.
- Lincoln Stone Quarry is permitted as a landfill by the Illinois EPA and has operated as a landfill for decades.

What is CCR? What is a CCR surface impoundment?

The Illinois Coal Ash Rules define both CCR and CCR surface impoundments:

> "Coal combustion residuals" or "CCR" means fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers.

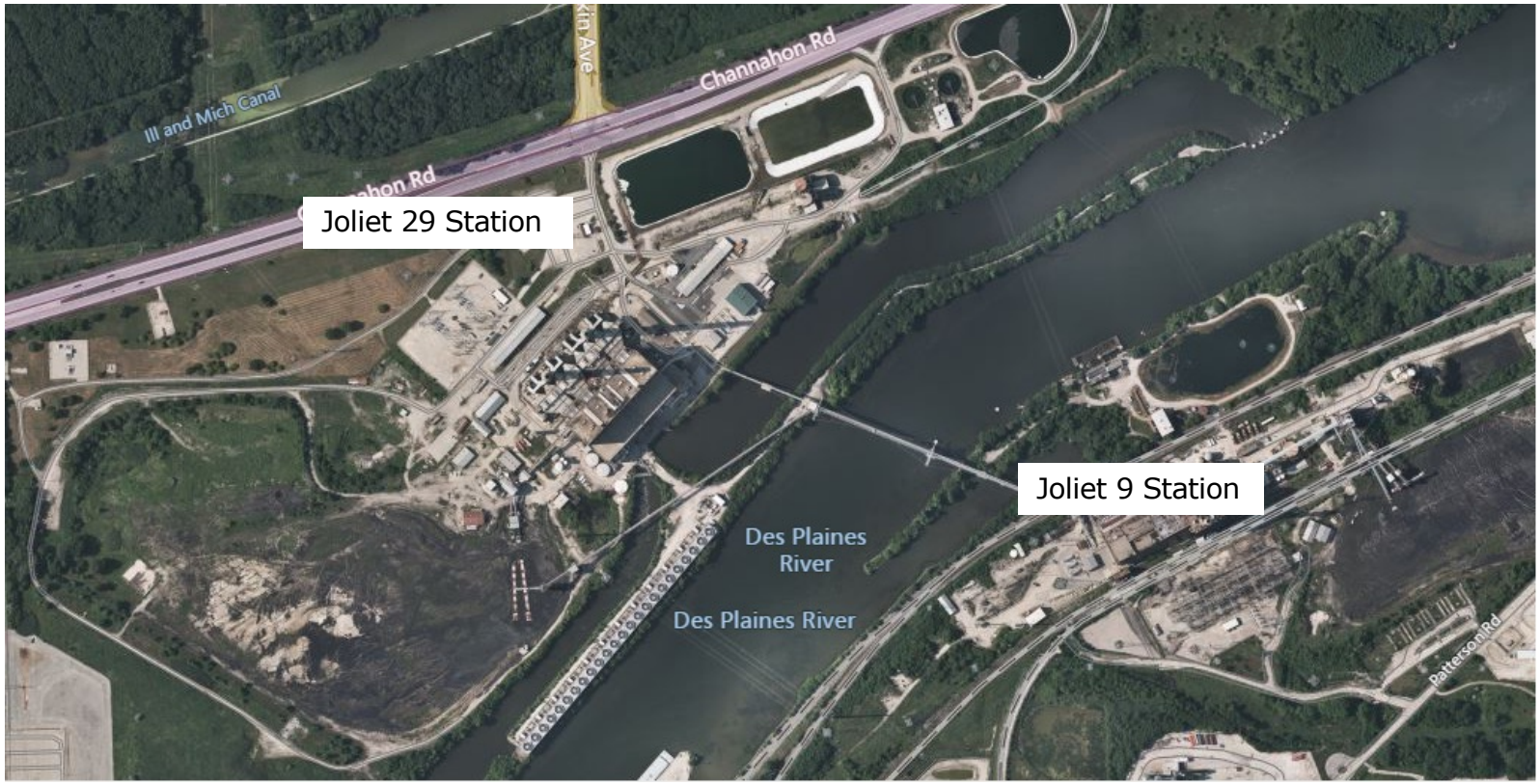
> "CCR surface impoundment" or "impoundment" means a natural topographic depression, man-made excavation, or diked area, which is designed to hold an accumulation of CCR and liquids, and the surface impoundment treats, stores, or disposes of CCR.

We're here today to present plans regarding a specific aspect of the Illinois Coal Ash Rules – the planned closure of Lincoln Stone Quarry.

Question? Click the chat icon at the bottom of your screen to type a question.
¿Pregunta? Haga clic en el icono del chat en la parte inferior de la pantalla para escribir su pregunta.

Joliet Generating Station Background

The Illinois EPA Bureau of Water treats Joliet Generating Station as two separate facilities – Joliet 29 and Joliet 9



Joliet 29 Station (Units 7 & 8) is on the northern side of the Des Plaines River, Joliet 9 Station (Unit 6) is on the southern side of the river.

MWG
Midwest Generation LLC.

Lincoln Stone Quarry Is A Permitted Landfill

Lincoln Stone Quarry was used, and is still permitted as, a **landfill** for coal ash generated at Joliet Station.

- Since the 1960s, Lincoln Stone Quarry has been used as a **permanent** disposal site for coal ash
- Since the mid-1970's, the beginning of the environmental permitting and regulations in Illinois, the Lincoln Stone Quarry has been permitted as a landfill by the Illinois EPA.
    - As required by the landfill permit:
        - Lincoln Stone Quarry has a landfill closure plan that is approved by both the Illinois EPA and Board. The approved closure plan for the LSQ as a landfill, is closing in place with a final cover system.
        - MWG has been monitoring the groundwater at the LSQ and has a comprehensive understanding of the groundwater flow and quality conditions associated with the Lincoln Stone Quarry.

Lincoln Stone Quarry Is A Permitted Landfill

The current landfill permit requires 39 monitoring wells to be sampled on a quarterly basis, however MWG samples 46 wells quarterly, more than are required. These wells are analyzed for 25 parameters. In addition, 19 wells are also monitored on a quarterly basis for 22 CCR parameters.

- The groundwater wells have given MWG and the Illinois EPA a comprehensive understanding of the groundwater flow and quality conditions associated with the Lincoln Stone Quarry.
  - We know the extent of the constituents in the groundwater.
  - The data shows that there is not, and has not been, movement of Lincoln Stone Quarry water towards the neighborhood to the northeast.

The Joliet Station has operated the Lincoln Stone Quarry for decades and done so responsibly. There are no groundwater impacts to the neighborhood and we will continue to monitor to confirm this in the future.

Lincoln Stone Quarry

Lincoln Stone Quarry consists of three areas: the Main Quarry which is the primary disposal site, the West Filled Area (WFA), and North Quarry

- Main Quarry – inactive, 43 acres in size, approximately 2.6 million cubic yards of CCR, received CCR from 1975-2019
- WFA – inactive, has a soil cover, 17 acres in size, approximately 1.7 million cubic yards of CCR, received CCR from 1962-1975
- North Quarry
  - Operates as a settling pond to treat the water discharged from the Main Quarry – NPDES permitted outfall
  - Not used for CCR storage or disposal
  - MWG closely monitors the elevation of the water in the LSQ and Boyd's Quarry, and discharges water to maintain the elevations.

In total, Lincoln Stone Quarry contains approximately 4.3 million cubic yards of CCR

Lincoln Stone Quarry

Question? Click the chat icon at the bottom of your screen to type a question.
¿Pregunta? Haga clic en el icono del chat en la parte inferior de la pantalla para escribir su pregunta.

Closure Alternatives Analysis

Two closure methods:

- Closure by Removal of CCR

  An owner or operator may elect to close a CCR surface impoundment by removing all CCR and decontaminating all areas affected by releases of CCR from the CCR surface impoundment. CCR removal and decontamination of the CCR surface impoundment are complete when all CCR and CCR residues, containment system components such as the impoundment liner and contaminated subsoils, and CCR impoundment structures and ancillary equipment have been removed. Closure by removal must be completed before the completion of a groundwater corrective action under Subpart F. *(35 IAC Section 845.740(a))*

- Closure in Place

  If a CCR surface impoundment is closed by leaving CCR in place, the owner or operator must install a final cover system that is designed to minimize infiltration and erosion, and, at a minimum, meets the requirements of this subsection (c). The final cover system must consist of a low permeability layer and a final protective layer. The design of the final cover system must be included in the preliminary and final written closure plans required by Section 845.720 and the construction permit application for closure submitted to the Agency. *(35 IAC Section 845.750(c))*

Closure Alternatives Analysis

The Closure Alternatives Analysis evaluated 8 different closure scenarios within the two closure methods:

Closure Method No. 1 - Closure by removal

- Scenario 1: Closure by removal of CCRs to an existing off-site landfill
  - Trucking;
  - Rail; and
  - Barge Transportation Methods
- Scenario 2: Closure by removal of CCRs to a new on-site landfill

Closure Method No. 2 - Closure in-place

- Scenario 3: Closure in-place with IEPA prescribed final cover
- Scenario 4: Closure in place with alternate final cover system
- Scenario 5: Consolidate and close in place
- Scenario 6: Closure in place with hydraulic controls
- Scenario 7: Closure in place with hydraulic containment
- Scenario 8: Closure in place with wet cap

Overview - Closure by Removal Method

- Consists of excavating CCR and relocating to a permitted landfill facility
- Evaluated both a new onsite landfill and existing offsite landfill scenarios
- Additional permits or approvals that may be required include:
  - Local or state permits for a new road entrance and/or traffic improvements on Patterson Road;
  - Modification of existing third-party off-site landfill permit for waste acceptance of CCRs;
  - New or modification of existing NDPES permit to address CCR dewatering discharge; and
  - Additional permits for siting new landfill on-site (IEPA-BOL, IEPA-BOA and NDPES permit for new stormwater discharge).

Closure Alternative Scenario No. 1
Closure by Removal – Off-site Landfill

- Closure Activities
  - Dewatering the Main Quarry;
  - CCR excavation and loading,
  - transport, and
  - disposal of CCR material at off-site landfill.
- Closure Schedule is more than 12 years, requiring approximately 340,000 trucks
- Off-Site Landfills
  - Laraway Recycling and Disposal Facility (RDF)
    - 6.67 million cubic yards of airspace
    - 5 years of landfill life
  - Prairie View RDF
    - 13.99 million cubic yards of airspace
    - 17 years of landfill life
    - Capacity guarantee to Will County
    - Recently removed waste restriction – June 2021

Laraway RDF

Prairie View RD

Question? Click the chat icon at the bottom of your screen to type a question.
¿Pregunta? Haga clic en el icono del chat en la parte inferior de la pantalla para escribir su pregunta.

Closure Alternatives Scenario No. 1 – Closure by Removal Transport Methods

Closure by removal transportation methods that were evaluated:

- Rail
  - Requires develop of 2 new railroad unloading facilities
    - At Lincoln Stone Quarry
    - At Unloading Facility
  - Local siting and IEPA permitting at both facilities
  - Requires crossing at Patterson Road
  - Would need approximately 17 acres for rail spur and unloading building
  - Assessed as unfeasible
- Barge
  - Requires develop of 2 new barge unloading facilities
    - At Lincoln Stone Quarry
    - At Unloading Facility
  - Local siting and IEPA permitting at both facilities
  - Requires crossing of five railroads and Patterson Road
  - Assessed as unfeasible
- Trucks –
  - Only existing transportation method that was deemed feasible
  - Doesn’t require building new facilities
  - Significant Impact on Roadway System (usage, accidents, and greenhouse gas emissions)

Closure Alternatives Scenario No. 1 – Example of Truck Traffic to Rte 53 for Closure by Removal

Closure Alternative Scenario No. 2
Closure by Removal – New On-site Landfill

- Closure by Removal to New On-Site Landfill Tasks:
  - Obtaining property;
  - Landfill zoning, permitting, designing;
  - Landfill construction and operation;
  - Engineering and environmental compliance;
  - Financial assurance and closure, 30-year post-closure responsibilities.
- Closure Schedule is over 14 years
- Area Need for New On-Site Landfill
  - 45 acres for landfill;
  - 20 acres for setbacks, stormwater management, operational infrastructure and groundwater monitoring; and
  - Total area is 65 acres (minimum).
- On-site Landfill was not feasible
  - No on-site property available
  - No off-site property was feasible to obtain
  - Greenfield landfill development is challenging

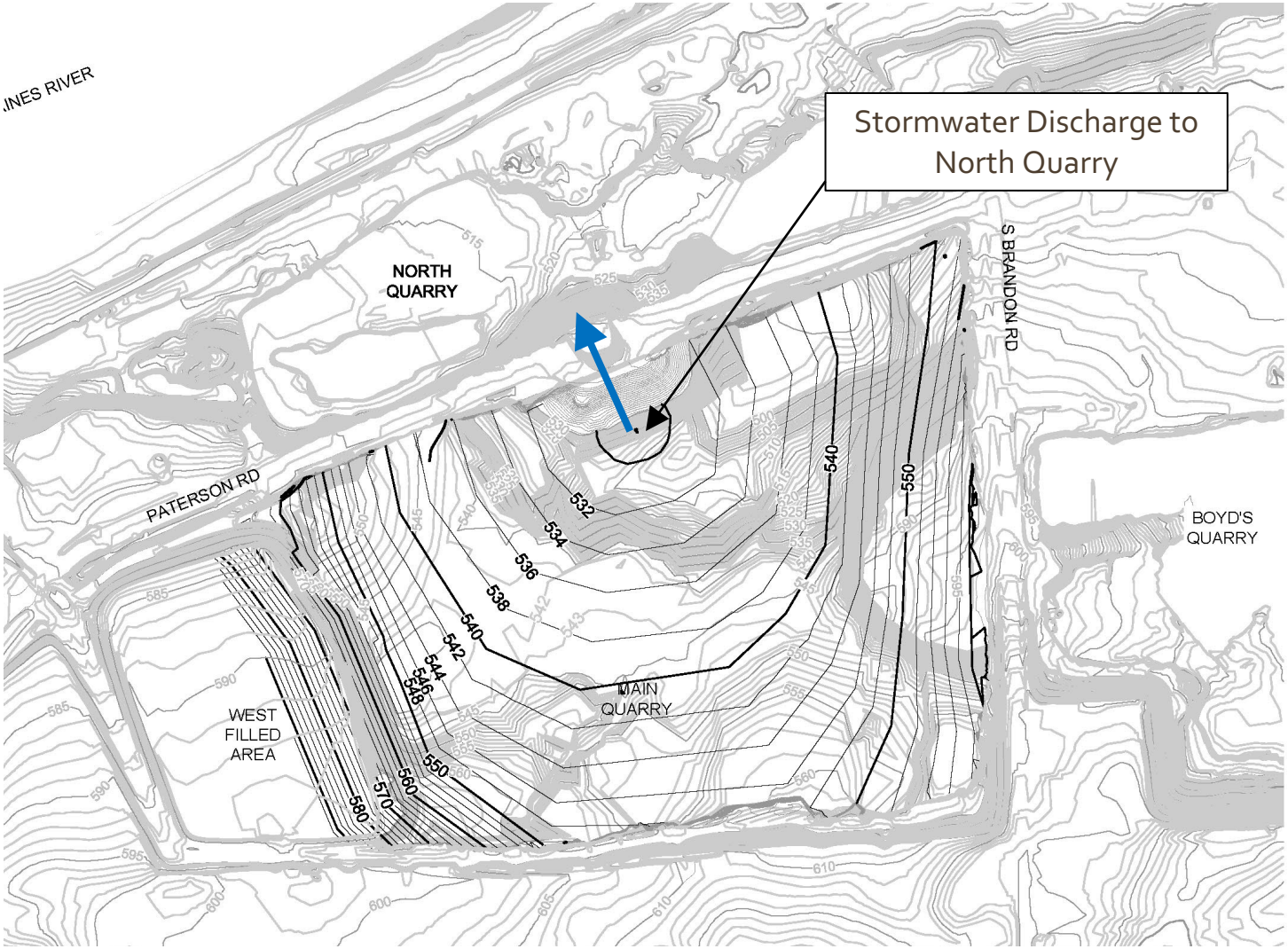
Overview – Closure in-Place Method

Closure Scenario No. 2 - Closure in-Place

- Consists of leaving the CCR in place and installing a final cover system
- Mitigates risks to human health and the environment by:
  - Engineered barrier
  - Reduction of leachate generation
- <u>USEPA and IEPA preferred closure method for similar solid waste management Units</u>
- A drainage system consisting of a series of "finger drains" would be installed under the final cover system to address leachate generation from groundwater infiltration
- Final cover would be installed over WFA (exception of Scenario 8)
- Closure Schedule is approximately 3 to 4 years
- The following permits or approvals may be required for the closure in-place scenarios:
  - 35 IAC Part 845 construction and operation permit(s)
  - Termination of existing IEPA BOL permit
  - Modification to existing NPDES Permit
  - Local permits for installation of borings and associated grout injection for closure scenario no. 7 (hydraulic containment).

Question? Click the chat icon at the bottom of your screen to type a question.
¿Pregunta? Haga clic en el icono del chat en la parte inferior de la pantalla para escribir su pregunta.

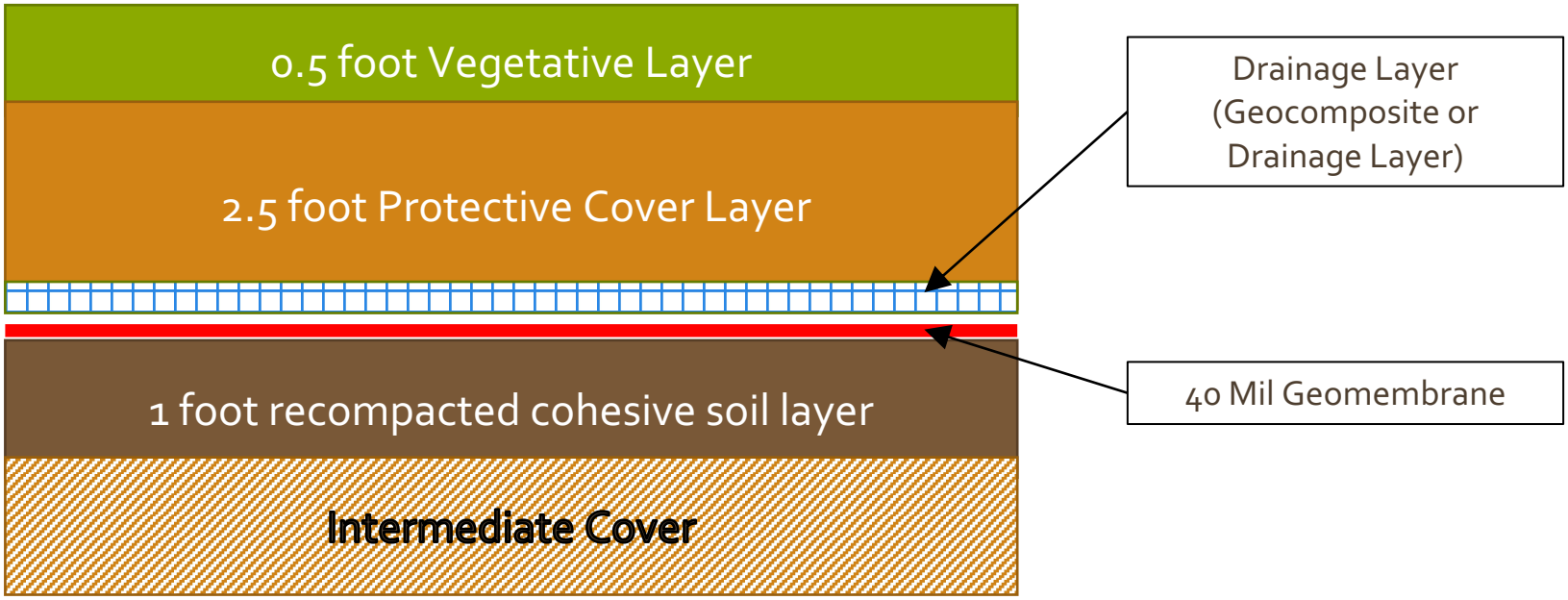
Closure Alternatives Analysis
Closure in-Place - Final Grading Plan



Closure In-Place Final Grading Plan (Scenarios 3, 4, 6, 7)

Closure Alternative Scenario No. 3
Closure in-Place – Illinois EPA Prescribed Cover

- The Illinois EPA prescribed final cover system
- The prescribed cover would require approximately 600,000 cubic yards of soil to be imported to the site, since no on-site source of soil exists

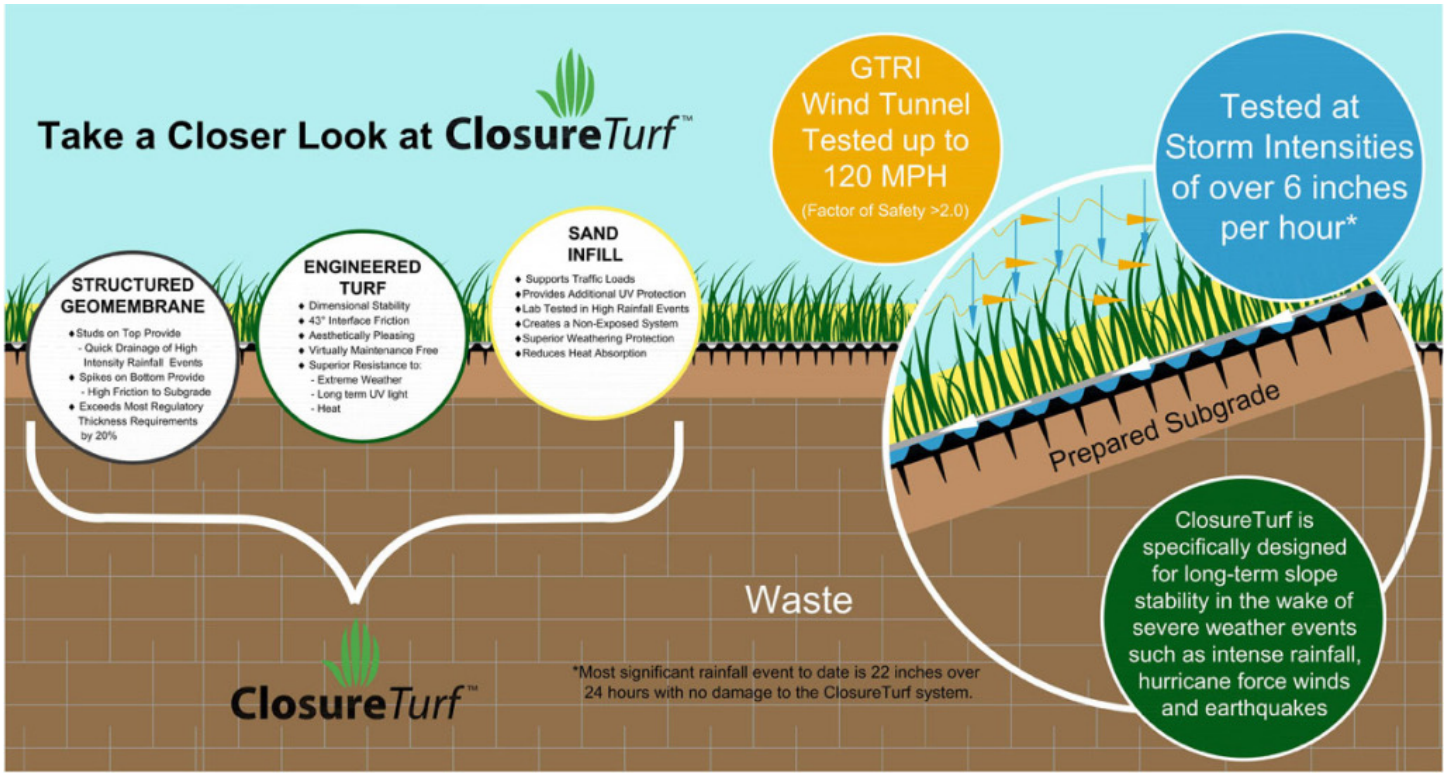


IEPA Prescribed Final Cover System

Closure Alternative Scenario No. 4
Closure in-Place with Alternate Final Cover System

- ClosureTurf® is a three-component system comprised of (bottom to top): structured geomembrane, engineered turf, and a specialized sand infill which minimizes the need for off-sites importation.

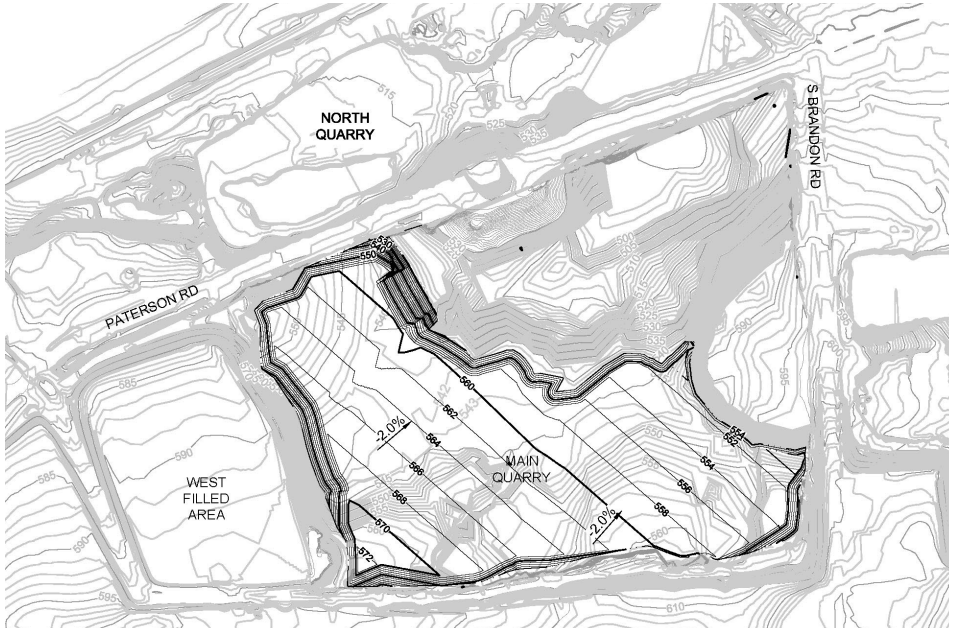
- ClosureTurf® is regulatorily compliant and is can be installed in a quick and efficient manner.



ClosureTurf Cross-Section (http://watershedgeo.com/closureturf/)

Closure Alternative Scenario 5
Consolidate and Close in-Place

- The Consolidate and Close in Place scenario (Scenario 5) consists of the following tasks:
  - Excavating CCR in the main quarry and consolidating the main quarry footprint from 43 acres to 33 acres
  - Final cover system of either IEPA prescribed or ClosureTurf®
- Challenges
  - Dewatering to allow for CCR excavation and consolidation
  - Slope stability of final landform grades



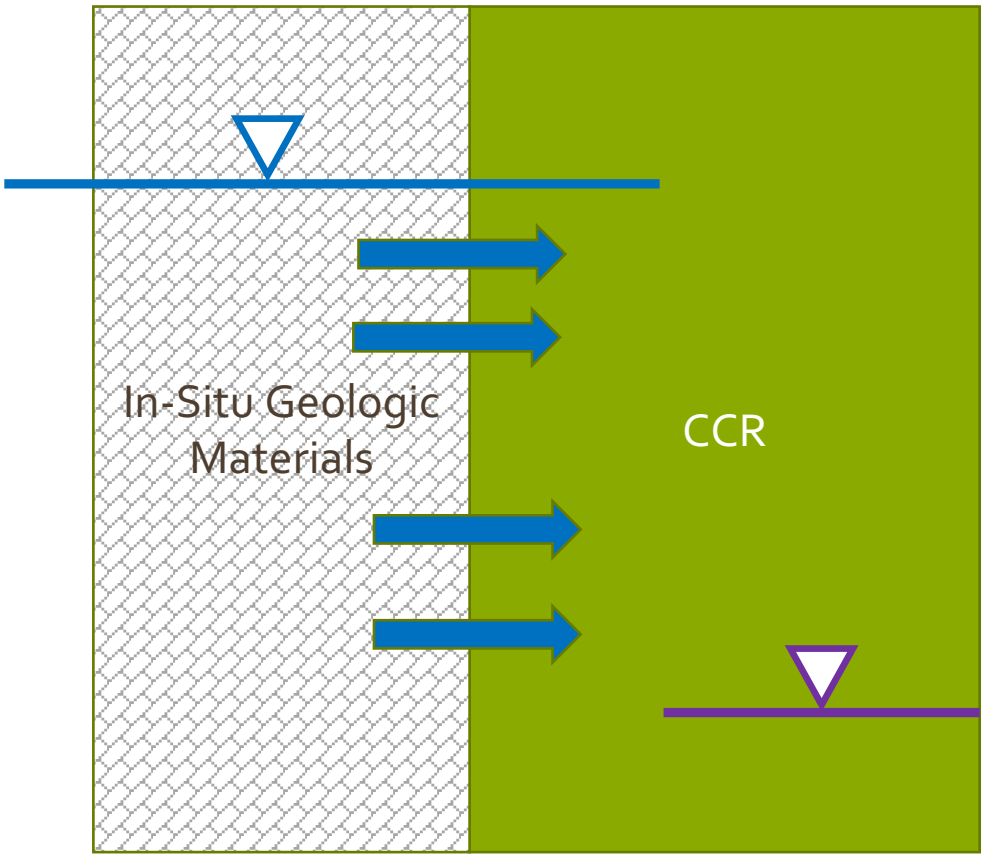
Consolidate Scenario Proposed Grading Plan

Question? Click the chat icon at the bottom of your screen to type a question.
¿Pregunta? Haga clic en el icono del chat en la parte inferior de la pantalla para escribir su pregunta.

Closure Alternative Scenario 6
Closure in-Place with Hydraulic Controls

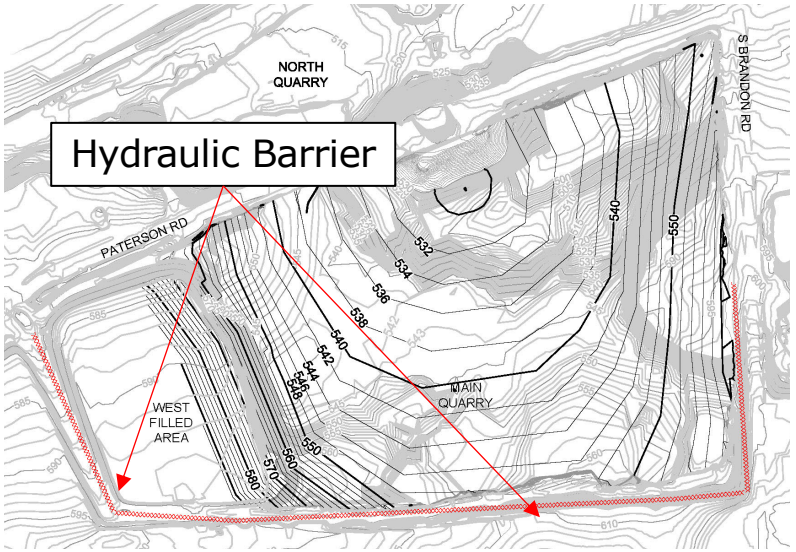
- Under this closure scenario, liquid or leachate extraction wells would be installed in the CCR waste in order to enhance the natural inward gradient conditions at the LSQ.

- A down-hole electronic or pneumatic pump would be installed to lower liquid levels. Pump water or leachate would be discharged through the facility's NPDES permit.



Closure Alternative Scenario 7 – Closure in Place with Hydraulic Containment

- Installation of hydraulic containment wall around the western and southern limits of the WFA and southern and eastern limits of the Main Quarry
- Reduce the hydraulic conductivity of these units (soil and rock) to minimize seepage from LSQ.
- The effectiveness of the hydraulic containment wall will depend on several factors:
  - Fracture pattern;
  - Chemical capability of the grout to bedrock;
  - Spacing of injection points; and
  - Grout intake rate.
- This technology has not evaluated based on the unique site-specific conditions (i.e., bedrock fractures due to weathering and blasting) at the LSQ; therefore, an extensive pilot testing program would be required to verify that this technology would be feasible and implementable.



Hydraulic Containment

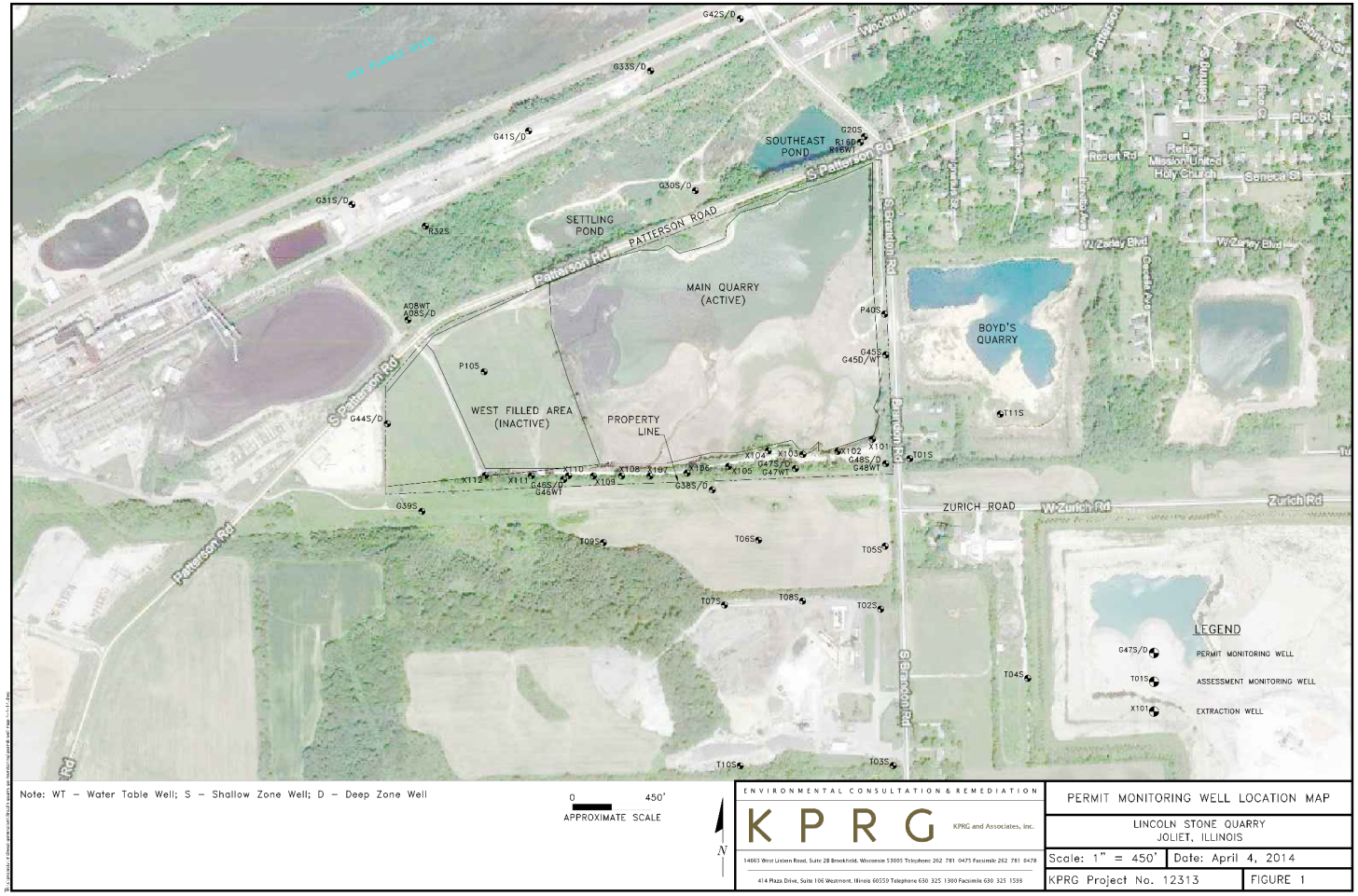
Closure Alternative Scenario No. 8
Closure in Place with Wet Cap

- Current approved closure plan (adjusted standard) allows for a "wet closure or cap"

- Wet Closure Cap consists of:
  - Physical barrier system below the natural water table;
  - Typically engineered sand or other physically durable material
  - Allows for natural reduction and/or oxidation processes; and
  - Common for river and lake sediment clean-up projects (for example the lower Calumet River project).

- Wet closure is a technically viable option and has the potential to enhance natural attenuation processes, it is understood to be a generally unfavorable closure alternative scenario.

Monitoring Well Site Map



Question? Click the chat icon at the bottom of your screen to type a question.
¿Pregunta? Haga clic en el icono del chat en la parte inferior de la pantalla para escribir su pregunta.

Groundwater Modeling Data

Four groundwater modeling scenarios were run:

1. Removal of CCR – Closure Alternatives #1, 2
2. Closure in place with final cover – Closure Alternatives #3, 4, 5
3. Closure in place with hydraulic containment – Closure Alternative #7
4. Closure in place with hydraulic controls – Closure Alternative #6

Groundwater modeling was done to compare the effectiveness of each closure scenario. Each model shows the current condition and compares to a plume after closure scenario is implemented and completed.

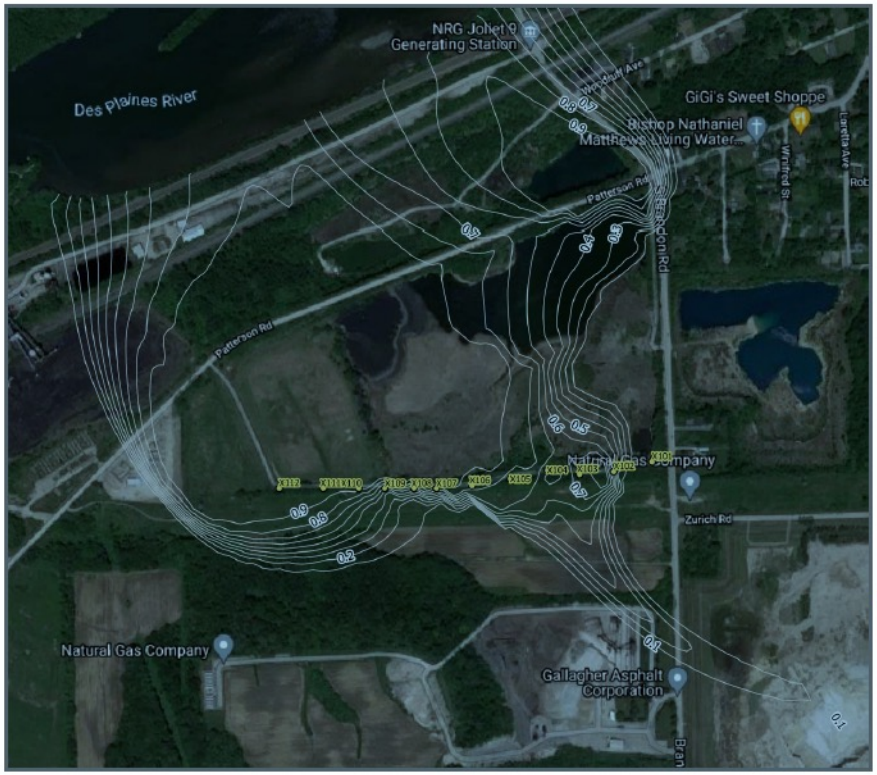
Each contour line shows concentration levels in 10% increments.

- 1 = 100% concentration of groundwater constituents
- 0.9 = 90% concentration of groundwater constituents (10% reduction of concentrations)
- 0.1 = 10% concentration of groundwater constituents (90% reduction of concentrations)

Groundwater Modeling Scenario #1

Corresponds to Closure Alternatives #1 & 2 – Closure by Removal

Source remains



Results shown for model layer 5, base of Main Quarry

Source removed, after 30 years

Groundwater Modeling Scenario #1

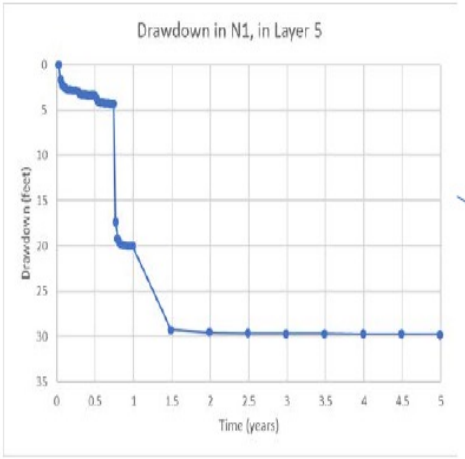
Drawdown of neighboring wells

The modeling shows a significant drawdown of adjacent groundwater wells during the dewatering and closure process

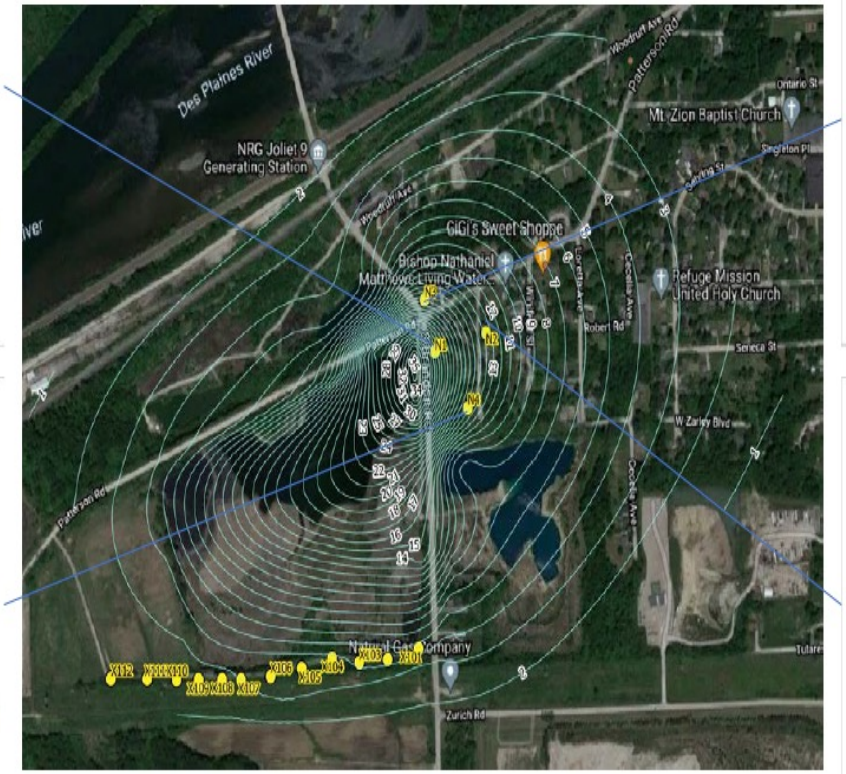
Closure by removal requires dewatering Lincoln Stone Quarry to accomplish. The flow model demonstrates that dewatering Lincoln Stone Quarry will also drawdown neighboring wells. The contours show the model's prediction of the decrease in well water levels at year 1.

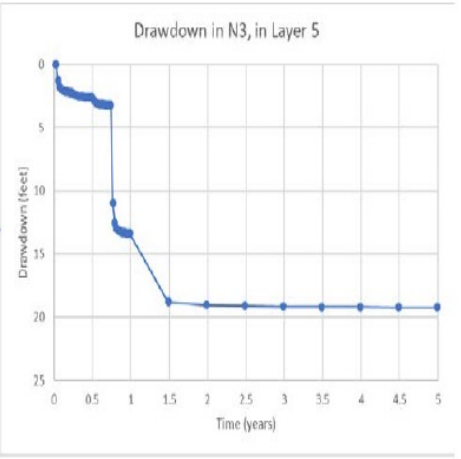
Groundwater Modeling Scenario #1

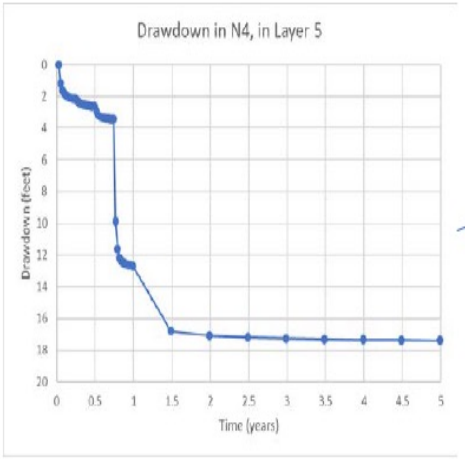
Drawdown of neighboring wells

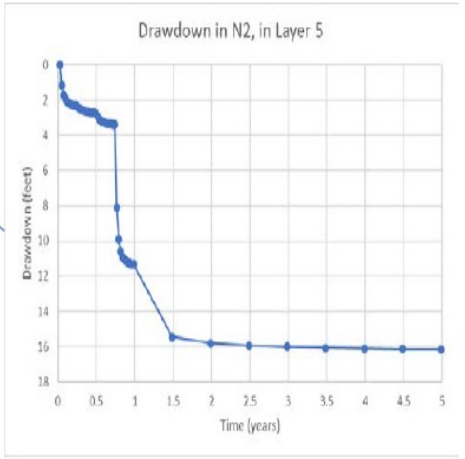


Drawdown in feet in layer 5, at 1 year







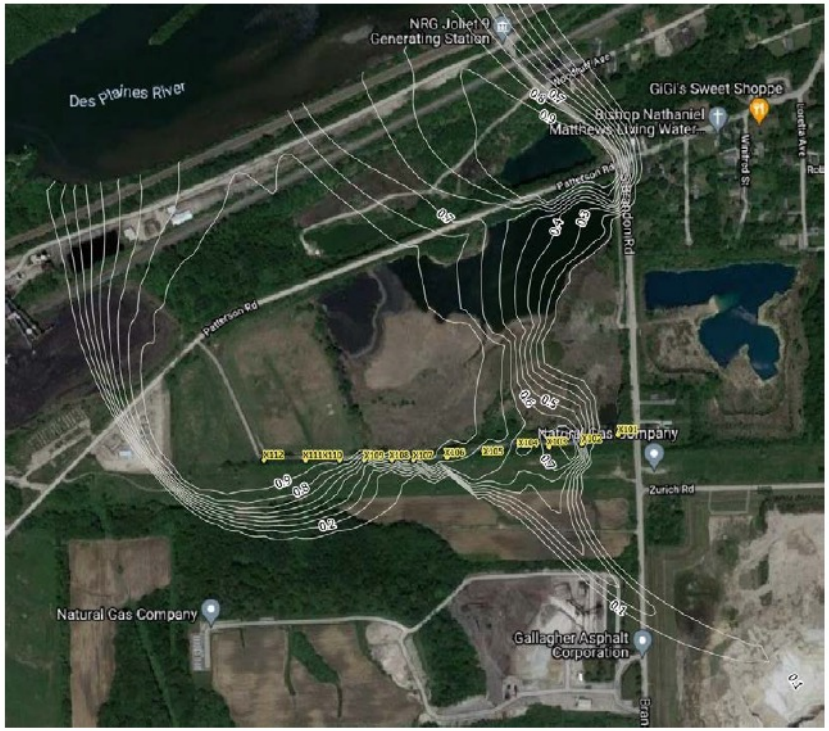


Question? Click the chat icon at the bottom of your screen to type a question.
¿Pregunta? Haga clic en el icono del chat en la parte inferior de la pantalla para escribir su pregunta.

Groundwater Modeling Scenario #2

Corresponds to Closure Alternatives #3,4, & 5 – Closure in place with a final cap

Source remains



Results shown for model layer 5, base of Main Quarry

Capped, after 100 years

Groundwater Modeling Scenario #3

Corresponds to Closure Alternative #7 – Closure in place with hydraulic containment

Source remains

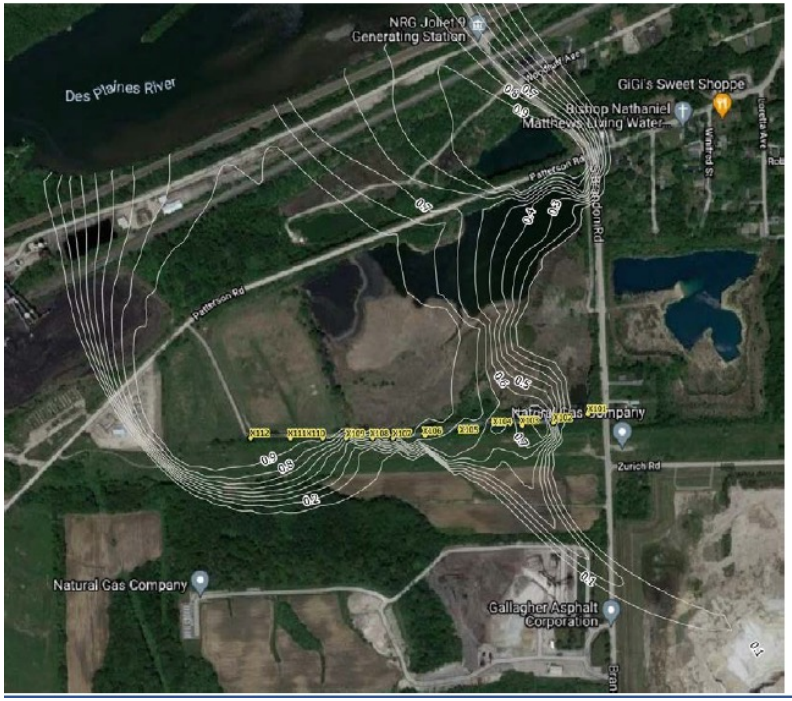
Results shown for model layer 5, base of Main Quarry

Capped, barrier wall along southern and eastern edges through dolomite, after 100 years

Groundwater Modeling Scenario #3

Corresponds to Closure Alternative #7 – Closure in place with hydraulic containment and removal of existing extraction wells

Source remains



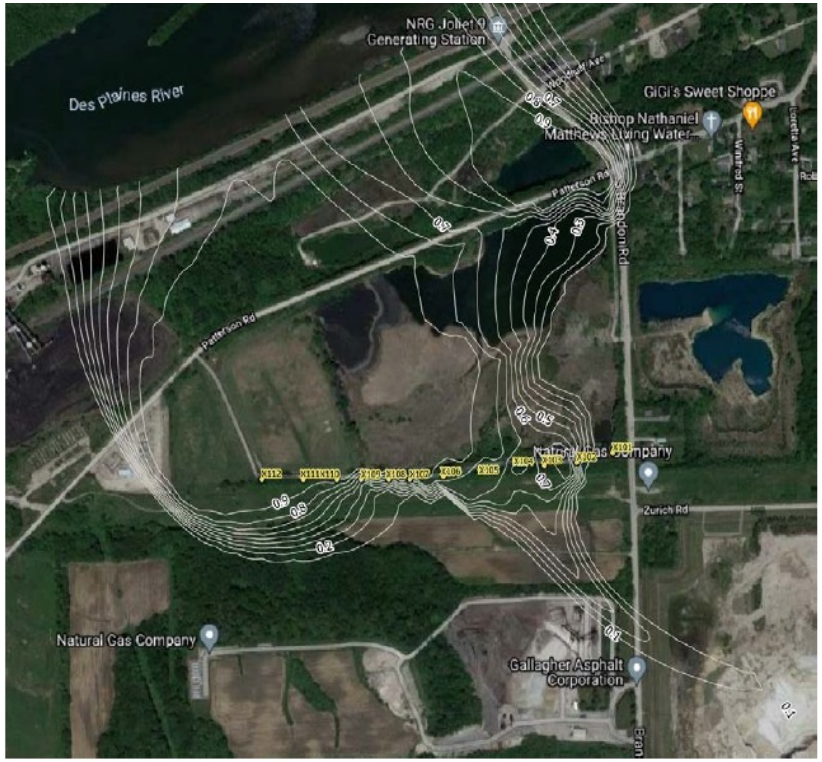
Results shown for model layer 5, base of Main Quarry

Capped, barrier wall along southern and eastern edges through dolomite, remove existing extraction wells, after 100 years

Groundwater Modeling Scenario #4

Corresponds to Closure Alternative #6 – Closure in place with hydraulic controls (extraction wells)

Source remains



Capped, add 47 extraction wells, after 100 years

Results shown for model layer 5, base of Main Quarry

Question? Click the chat icon at the bottom of your screen to type a question.
¿Pregunta? Haga clic en el icono del chat en la parte inferior de la pantalla para escribir su pregunta.

MWG
Midwest Generation LLC.

Closure Alternatives Analysis Conclusions

- The Closure by Removal scenarios are not feasible due to limits on either nearby permitted landfill space, lack of transfer station infrastructure for rail or barge transport, or available real estate to develop a new landfill. Additionally, Closure by Removal has the potential to cause neighboring wells to run dry.

- Additionally, the Closure by Removal scenarios would have larger impacts, as compared to the Closure in Place scenarios, to the environment in the form of greenhouse gas emissions and human health in the form of worker safety, and vehicle accidents.

Based on site specific conditions, the Closure in Place scenarios provide both short- and long-term protection to groundwater and surface water resources along with ensuring overall protection to the public health, welfare and safety.

Proposed Closure & Post-Closure Care Plans

Closure in Place with Alternate Final Cover (ClosureTurf) - Scenario 4

- Final cover isolates CCR from stormwater, helping to protect and manage groundwater
- Minimizes the need for off-site soils to be trucked into the site and used as fill
- Minimizes potential drawdown of neighboring wells
- Proven closure method at other landfills and surface impoundments in US, including in IL
- Long term reliability in minimizing risk to human health and the environment
- Closure could be completed in approximately 2.5 years compared to at least 12 years in the case of closure by removal

- The required post-closure care period for closure in place is at least 30 years or until contaminant concentrations are below the state standards.

Public Website:
midwestgenerationllc.com

Exhibit F:

Summary of public meetings

Midwest Generation, LLC
Joliet 9 Generating Station
Lincoln Stone Quarry 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 9 Generating Station's Lincoln Stone Quarry 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 9 Generating Station's Lincoln Stone Quarry were held on December 8, 2021 from 6:00 p.m. to 8:00 p.m. and on December 9, 2021 from 10:00 a.m. to 12:00 p.m. The meetings were held virtually, and participants were invited to attend via Zoom or telephone. Twenty-six members of the public attended the December 8th meeting, and twenty-four 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. Seventeen attendees requested a copy of the meeting summary, fourteen of whom requested transmittal of their email address to the Agency to be added to the Agency's listserv for the facility. It was announced that the link would be available on MWG's public website for two weeks. After an introduction and approximate 45-minute presentation on the proposed closure construction plan, the public was given approximately 1 hour 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 Lincoln Stone Quarry in place by installing an alternate final cover system (ClosureTurf).

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. A copy of the presentation is posted on MWG's public website, midwestgenerationllc.com.

Closure Method

Two members of the public commented their agreement with closing the Lincoln Stone Quarry in place with an approved final cover system. The President of the Will County Environmental Network, a group that has been involved in environmental matters in the vicinity of Lincoln Stone Quarry for over 40 years, stated, in part, at the December 8th meeting:

> "The Network believes that covering and maintaining the system design would be the best solution for the closure of this facility. We would be opposed to the removal of the ash for several reasons."

However, others, including members of other environmental groups, oppose MWG's proposal.

Groundwater

Several attendees had questions relating to groundwater impacts from the Lincoln Stone Quarry. Groundwater quality and flow conditions for the facility are monitored on a quarterly basis through an Illinois EPA approved groundwater monitoring well network established pursuant to the Lincoln Stone Quarry's landfill permit issued by the Illinois EPA. The monitoring network consists of both detection wells and assessment wells, which cover all four sides of the facility, including wells that are outside of the Lincoln Stone Quarry property boundary. No private wells have been impacted by the Lincoln Stone Quarry.

In the 2000's, the groundwater flow direction was reversed by dewatering operations at a nearby active quarrying operation to the south. The reversal of groundwater flow caused elevated concentrations of boron, molybdenum, arsenic, and sulfate to migrate from the south/southeastern corner of the Main Quarry. To mitigate the migration, MWG installed a groundwater extraction system along the southern edge of the Lincoln Stone Quarry. The extraction system has been operating since February 2012. The objective of the extraction system is to establish a sufficient hydraulic trough (*i.e.*, a groundwater low point) to capture water moving toward the south and to re-establish an inward hydraulic gradient from the south property boundary to the north. In addition to the extraction system, Illinois EPA approved a groundwater management zone in the area south of the Lincoln Stone Quarry.

Several attendees asked about the groundwater monitoring program. The complete list of analyzed constituents can be found in 35 IAC Section 845.600(a)(1). Groundwater samples are collected by third parties and are sent to a state-certified environmental analytical laboratory for analysis. The results from each groundwater sampling event are posted on MWG's public website – midwestgenerationllc.com.

Groundwater monitoring after closure in place is required for thirty years after completion of closure or the results meet the requirements specified under Section 845.780(c)(2), whichever is later.

Groundwater modeling

Multiple attendees questioned or commented upon the groundwater modeling. The model allows for a mathematical representation of the groundwater flow system. Actual groundwater level data collected from site monitoring wells over many years is used within the model to replicate the flow conditions within the aquifer that currently exist. Once the computer model can sufficiently replicate actual existing field conditions, various proposed engineering scenarios being considered and developed can then be overlain

in the model to assess future short- and long-term effects of a proposed engineering option on changes in groundwater quality and flow conditions.

The initial groundwater model was generated as part of the landfill operating permit renewal which was formally approved by Illinois EPA on August 14, 2015 (Landfill Permit No. 1994-241-LFM, Modification No. 21). The model is very large, has 10 layers, and contains approximately 1.7 million cells horizontally and vertically. To account for the fractured flow system, a cell size of 12.5 feet was established in the vicinity of the Lincoln Stone Quarry, which is extremely small. The model is described in detail in The Revised Groundwater Impact Assessment – Lincoln Stone Quarry Landfill, Addendum to IEPA Application Logs 2004-052 and 2009-211 dated March 13, 2013.

The purpose of groundwater modeling for the proposed construction permit application was to provide feedback to the engineering team to show the effectiveness of each closure scenario. The modeling was done for the overall concepts – complete removal of ash, placement of cap/closure in place, closure in place with hydraulic containment, and closure in place with hydraulic controls. The modeling showed that, even with a slow dewatering over the course of a year, the dewatering required for a closure by removal would dewater (or drawdown) nearby residential wells substantially. Results of the modeling show that while there will be improvement in groundwater quality, there will be residual groundwater impacts downgradient of the Lincoln Stone Quarry for some time, regardless of the closure method chosen. Management of these impacts will require implementation of institutional controls as part of any engineering alternative considered, which may include such items as establishment and monitoring of a Groundwater Management Zone (GMZ) along with a deed restriction precluding installation of water wells within that area and use of the groundwater.

The full groundwater modeling report will be included with the construction permit application that will be submitted to Illinois EPA by February 1, 2022. The permit application will be posted to MWG's website within 14 days of submittal to the Illinois EPA.

Other Closure Concerns

Several attendees asked about the composition of the bottom of the Lincoln Stone Quarry and leachate management. The Lincoln Stone Quarry is an old dolomite quarry; the base and sidewalls are Silurian dolomite which is the type of bedrock found in the surrounding area. Leachate that would be collected and generated in a closure in place scenario would be treated as required by the Illinois EPA prior to being discharged to the Des Plaines river via the existing NPDES permitted outfall. The water must meet permit limits before discharge.

Questions were raised about using rail and barge to transport ash and the rail and conveyor system located at Joliet 9 Station. 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, from Joliet 9 Station to Joliet 29 Station. It was not 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 rail operations, the coal dumping and conveyor systems are no longer operational. To use the rail system at Joliet 9 for transport of CCR, 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. A barge loading system is not currently present at Joliet

9, so like the rail system, a new system would need to be installed and would also require extensive environmental permitting.

Several attendees asked about the wet cap closure scenario. A wet cap involves installing a physical barrier, like an engineered sand, that fully caps the containments below the natural water table, so water would be above the physical barrier and be the top surface. A wet closure is an effective and protective means of closure; however, it is not currently permissible under the State or Federal CCR rules.

Multiple questions were asked about the final development of the space once a final cap was installed. Once the impoundment has completed post closure care, the area will be considered passive open space.

Several questions were raised about truck traffic arising from transporting CCR off site. High volumes of truck traffic would occur if a closure by removal option is selected. The trucking route would depend on the final disposal location but is expected to travel through some portions of residential neighborhoods since there are only 3 ways to access the Lincoln Stone Quarry, from the north and south via Brandon Road and from the east via Patterson Road. Removing the ash by extensive truck traffic would increase the risk of vehicle accidents and would result in a significant amount of greenhouse gas emissions. Under the preferred closure scenario, there would be minimal trucking (orders of magnitude less than closure by removal), because MWG would only need to truck the final cap materials into facility.

Questions were raised regarding beneficial use of the ash within Lincoln Stone Quarry. The process of evaluating the market for beneficial use of ash is done by MWG's commercial marketing team. MWG routinely evaluates the market for sources that would accept ash for beneficial use and at this time, MWG has not identified a source. With regard to the closure of Lincoln Stone Quarry, beneficial reuse of ash would have the same effect as closure by removal, requiring significant dewatering and truck traffic.

A question was asked about hydraulic controls presented in the Closure Alternatives Analysis. Hydraulic controls may be able to control the groundwater flow around the Lincoln Stone Quarry. However, due to the geology of the Lincoln Stone Quarry, it is unknown if hydraulic controls could be installed or technically effective.

Residential Well testing

Several attendees inquired about residential well testing, referring to a public meeting held in August 2019 for Lincoln Stone Quarry. At that meeting, MWG offered to sample residential wells and of a total of nine residents sought testing. As MWG was in the planning process for well sampling, the Covid-19 pandemic began and for safety of the residents and sampling team, MWG delayed execution of sampling.

Additionally, at the time of the 2019 meeting, MWG was unaware that the City of Joliet had restricted the use of groundwater for potable use in a large portion of the neighborhood northeast of Lincoln Stone Quarry due to sulfate contamination from a different industrial source. MWG will follow up with the residents who requested well water testing at the 2019 meeting and are not connected to the public water supply. MWG does not plan to offer testing to any additional residents.

MWG and prior operators of Lincoln Stone Quarry has been monitoring the groundwater flow direction and quality around the Lincoln Stone Quarry for decades pursuant to the Lincoln Stone Quarry's landfill

permit issued by the Illinois EPA. Groundwater from Lincoln Stone Quarry is not moving toward the northeast and is not impacting residential well water quality.

Financial Assurance

Questions were asked about what financial systems are in place to ensure long-term monitoring is completed after closure. Owners of CCR surface impoundments are required to provide financial assurance to ensure the completion of closure, completion of post-closure care, and, when applicable, remediation of releases from CCR surface impoundments. Pursuant to its landfill permit, to the best of its knowledge, MWG has had financial assurance for closure of Lincoln Stone Quarry dating back to the 1980s. Pursuant to the Illinois CCR rule, MWG has provided financial assurance in the form of a performance bond to Illinois EPA.

ClosureTurf

MWG has not completed any CCR surface impoundment closures under Part 845. ClosureTurf has been approved for use for CCR surface impoundments or landfills at more than 100 sites in the US, including a closure at the Meridosia Power Plant in Illinois. Geosyntec Consultants has been involved in multiple projects that have successfully used ClosureTurf. The design and engineering of the ClosureTurf cap is expected to last for over 1,000 years, based upon accelerated testing to determine how long materials will last in the real world. The Illinois CCR Rule also requires routine inspections of final cover system and any repairs needed would be made.

Closure Costs

Questions were asked about closure costs. Costs were not determinative in selecting closure by removal. The Bipartisan Infrastructure Investment Bill signed into law in November 2021 was not a consideration in any of the closure scenarios evaluated because the law is geared for public infrastructure, not private.

Future Use

Several members of the public commented upon or questioned the future use of Lincoln Stone Quarry, specifically around making the space accessible for public access. MWG is currently not able to suggest or predict future uses other than passive open space.

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, we are proceeding with our proposal for closing Lincoln Stone Quarry in place by installing an alternate final cover system (ClosureTurf) as presented at the public meetings. Taking public comments into consideration, and with additional deliberations after the public meetings, our full analysis continues to indicate that our proposed plan – which remains subject to regulatory review and approval – prioritizes the environment and community well-being.