

**CLOSURE PLAN
ASH SURGE BASIN AND BYPASS BASIN
POWERTON STATION
OCTOBER 2016**

Pursuant to 40 CFR §257.102(b), Geosyntec Consultants prepared this Closure Plan for the Ash Surge Basin and the Bypass Basin at the Powerton Station (Site), operated by Midwest Generation, LLC. (Midwest Generation), in Pekin, Illinois (Figure 1). This Closure Plan was developed to describe the steps necessary to close the coal combustion residual (CCR) units at any point during their active life in a manner that is consistent with recognized and generally accepted good engineering practices. Ms. Jane Soule, P.E., of Geosyntec Consultants, prepared this Closure Plan. Mr. Robert White reviewed this plan in accordance with Geosyntec's senior review policy.

The following addresses the information required by §257.102(b).

1. Narrative of Closure - §257.102(b)(1)(i)

The Ash Surge Basin and Bypass Basin will be closed through removal of CCR, and the closures will be performed in accordance with §257.102(c). CCR will be removed as described in the following section.

2. CCR Removal and Decontamination – §257.102(b)(1)(ii)

The same general process will be used to remove CCR from the Ash Surge Basin and the Bypass Basin. First, water contained in the basins will be drained using the existing outlet structures. Portable pumps may be used once the pool level is below the invert elevation of the outlet structures to pump water into the outlet structures. Next, heavy equipment will move CCR from one side of the basin to the other to further dewater the CCR solids. Once the material is dry enough to handle, CCR will be loaded into trucks and transported to a beneficial use facility or a permitted disposal facility. If the units will not be transitioned to store non-CCR process waters, the liner systems will be removed and transported to a permitted disposal facility. Otherwise, the liner systems will be properly decontaminated. Appurtenant structures such as inlet troughs, spillways, and piping will also be properly decontaminated or removed and transported to a permitted disposal facility depending on potential reuse opportunities for the structures identified at the time of closure. Decontamination procedures for the liner or appurtenant structures may consist of pressure washing, scrubbing, flushing or other generally accepted decontamination procedures. In accordance with §257.102(c), CCR removal and decontamination will be complete when constituent concentrations throughout the CCR unit and areas that may have been

affected by releases from these units have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to §257.95(h) for constituents listed in Appendix IV for two consecutive sampling events using the statistical procedures in §257.93(g). Decontamination may include removal of all CCR materials above the geomembrane liner to facilitate inspection of the liner for evidence of damage that may indicate a potential release of CCR. If evidence of a release is identified during closure, materials impacted by the release will be removed or remediated, as appropriate. Existing embankments may be breached to limit collection of stormwater if consistent with future proposed land use.

3. Final Cover Requirements – §257.102(b)(1)(iii)

CCR will be removed from the Ash Surge Basin and the Bypass Basin in accordance with §257.102(c); therefore, no final cover system will be constructed for closure.

4. Maximum CCR Inventory - §257.102(b)(1)(iv)

Detailed records of the maximum inventory of CCR ever on site and stored in the Ash Surge and Bypass Basins are not available. For the purposes of this closure plan, the maximum CCR inventory for each basin was estimated to be the maximum quantity of CCR that could be reasonably stored in the basins. The table below presents the estimated maximum CCR inventory for the Ash Surge Basin and the Bypass Basin.

Basin	Estimated Maximum Quantity of CCR (cubic yards)
Ash Surge Basin	140,000
Bypass Basin	6,700

5. Maximum Area Requiring Final Cover – §257.102(b)(1)(v)

CCR will be removed from the Ash Surge Basin and the Bypass Basin in accordance with §257.102(c); therefore, no final cover system will be constructed for closure.

6. Closure Schedule – §257.102(b)(1)(vi)

Closure of the Ash Surge Basin and Bypass Basin is anticipated to begin in 2034 and be complete within five years of the commencement of closure in accordance with §257.102(f)(1)(ii). Prior to initiation of closure, a notice of intent to close will be prepared in

accordance with §257.102(g). Closure will assume to have been initiated when waste placement has ceased and any of the following actions are completed:

- Taken any steps to implement this written closure plan;
- Submitted a completed application for any required agency permit or permit modification; or
- Taken any steps to comply with any agency standards that are a prerequisite to initiating closure.

Closure design documents will be prepared to support applications for required local, state, and federal permits. Closure construction design documents may include construction drawings for closure, technical specifications, and adequate CCR removal confirmation procedures. The permits required for closure construction will be evaluated at the time of closure, but are anticipated to include permits from the Illinois Environmental Protection Agency (IEPA), Illinois Department of Natural Resources (IDNR), and Tazewell County. A preliminary schedule of anticipated closure activities and associated dates is included below.

Closure Activity	Year
Preparation of Closure Construction Design Documents	2032
Obtain Permits	2034
Last Receipt of CCR	2034
Begin Dewatering	2034
Removal of CCR	2034-2039
Decontamination of Appurtenant Structures	2034-2039
Completion of Closure	2039

In accordance with §257.102(e), closure activities will commence when one or more of the following conditions has occurred:

- No later than 30 days after the date on which the CCR unit received the known final receipt of CCR or non-CCR waste;
- No later than 30 days after the removal of the known final volume of CCR for the purpose of beneficial use;
- Within two years of the last receipt of waste for a unit that has not received CCR or non-CCR waste; or

- Within two years of the last removal of CCR material for the purposes of beneficial use.

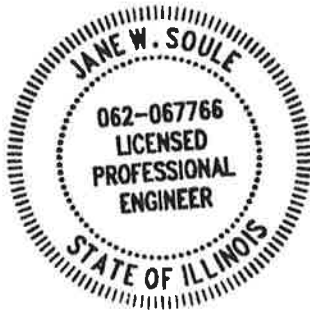
In accordance with §257.102(h), notification of closure of a CCR unit will be made within 30 days of the completion of closure of the CCR unit. The notification will include certification from a qualified professional engineer, as required by §257.102(f)(3).

7. Closure Plan Amendments – §257.102(b)(3)

This Closure Plan will be amended in accordance with §257.102(b)(3) if a change in the operation of the Ash Surge Basin or Bypass Basin would substantially affect the content of this Closure Plan or if unanticipated events necessitate revision of the plan. If a change in operation requires amendment to the Closure Plan, the plan will be amended no later than 60 days prior to the change in operation being implemented. If an unexpected event occurs that requires amendment of the Closure Plan, the plan will be amended within 60 days of the unexpected event or within 30 days of the unexpected event if the event occurs after closure activities have commenced. Amendments to this Closure Plan will be certified by a professional engineer registered in the State of Illinois in accordance with §257.102(b)(4).

8. Certification – §257.102(b)(4)

This Closure Plan has been prepared to meet the requirements of 40 CFR §257.102(b) and was prepared under the direction of Ms. Jane Soule, P.E.

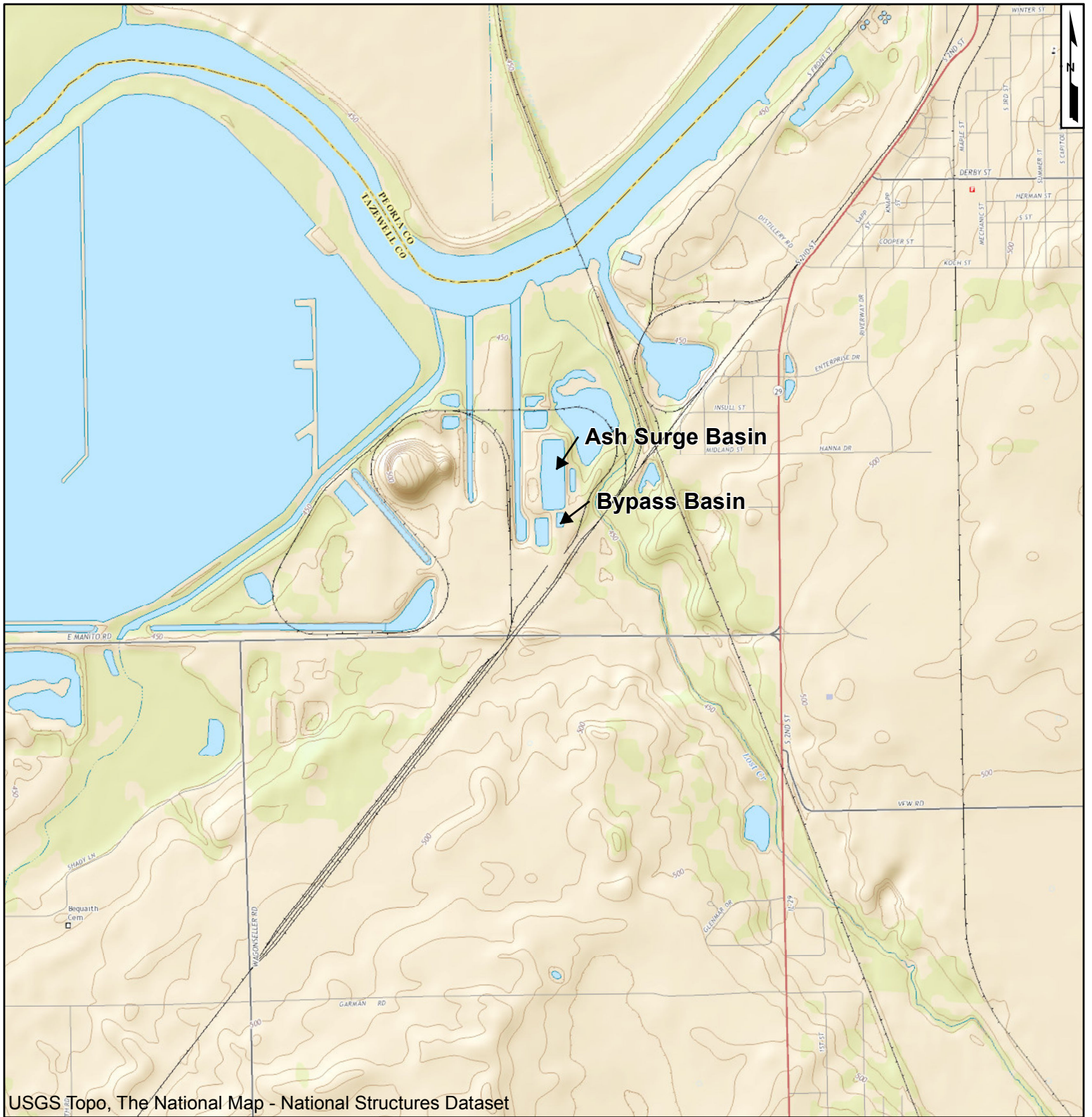


A handwritten signature of Jane W. Soule in cursive script, written over a horizontal line.

Jane W. Soule, P.E.

Illinois Professional Engineer No. 062-067766

Expiration Date: 11/30/2017



USGS Topo, The National Map - National Structures Dataset



2,000 1,000 0 2,000 Feet



Site Location

Ash Surge and Bypass Basins
Powerton Station
Pekin, Illinois

Geosyntec
consultants

Figure

1

San Diego

October 2016