



Midwest Generation, LLC
Powerton Generating Station
Documentation of Public Meeting

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

Midwest Generation, LLC's (MWG) Powerton Generating Station (Powerton Station) is located at 13082 E. Manito Road in Pekin, Illinois. Powerton Station operates the Ash Surge Basin and Metal Cleaning Basin.

Pursuant to Section 845.240, MWG held two public meetings on the tentative applications 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
- 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 April 24 and 25, 2023 public meetings
- Exhibit F: Summary of public meetings

Exhibit A:

Public Notice



Midwest Generation, LLC

Public Notice

*Midwest Generation to Host Public Meetings on
Retrofits of the Ash Surge Basin and Metal Cleaning
Basin at Powerton Generating Station*

What: Midwest Generation (MWG) is hosting two public meetings to share information and engage with the community about its proposed plans for its Ash Surge and Metal Cleaning Basins at Powerton Generating Station. MWG plans to retrofit both basins. The proposals for the Ash Surge and Metal Cleaning Basins each entail removing the remaining coal combustion residuals (CCR), installing a new composite liner system, installing a new leachate collection and removal system, and continuing to use each basin as a CCR surface impoundment. MWG will file construction permit applications for each basin with the State of Illinois no later than August 1, 2023. Following a presentation at each meeting, the public will have an opportunity to make comments and ask questions.

When: Monday, April 24, 2023, 6 p.m. to 8 p.m.
Tuesday, April 25, 2023, 10 a.m. to 12 p.m.

Where: Avanti's Dome*
3401 Griffin Ave
Pekin, IL 61554
**Accessible to persons with disabilities.*

Information on the retrofit construction permit applications will be posted at midwestgenerationllc.com no later than **March 24, 2023**. Contact: midwestgeneration@nrg.com.



Exhibit B:

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



UNITED STATES POSTAL SERVICE.

PEKIN 514 BROADWAY ST PEKIN, IL 61554-9998 (800)275-8777

03/23/2023 08:07 AM

Product Qty Unit Price

Every Door Direct Trans Type: Rejected Reason Code: 1 \$0.00

Every Door Direct Trans Type: Online Paid at Retail Name: Jeff Brockamp CRID/Act No Pieces: 1104 Mail Piece Weight: 0.30 oz Acceptance Date: 2023-03-23 Tracking #: 11000000001413333070000092628670110407

Grand Total: \$208.66

Personal/Bus Check \$208.66

In a hurry? Self-service kiosks offer quick and easy check-out. Any Retail Associate can show you how.

Preview your Mail Track your Packages Sign up for FREE! https://informedelivery.usps.com

All sales final on stamps and postage. Refunds for guaranteed services only. Thank you for your business.

Tell us about your experience. Go to: https://postal.experience.com/Pos or scan this code with your mobile device.



or call 1-800-410-7420

LFN: 166168-0887 Receipt #: 840-96040339-1-4130480-1 Clerk: 84

United States Postal Service Every Door Direct Mail (EDDM) Retail®

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

Form fields for Name and Address of Individual or Organization, Telephone, Name and Address of Mailing Agent, Telephone, Customer Registration I.D. (CRID)

Form fields for Post Office of Mailing, Processing Category, Mailing Date, Total # of Bundles, Type of Postage, Delivery Type, Weight of a Single Piece, Max Weight, Meter Strip

Table with columns: Entry, Price Category, Price, No. of Pieces, Subtotal Postage, Incentive/Discount Amount, Total Postage, Status

The mailer's signature certifies acceptance of liability for and agreement to pay any revenue deficiencies assessed on this mailing, subject to appeal.

Signature fields for Mailing Agent and Postal Employee

Form fields for Postmaster Report Total Postage in AIC, Subtotal Postage, Incentive/Discount Amount, Weight of a Single Piece, Total Number of Pieces, Total Postage, Round Date

Form fields for Number of Bundles, Any postage figures adjusted from mailer's request, Date Meter Notified, Contact, By (initials), Time, AM/PM, USPS Verification Employee Signature

EVERY DOOR DIRECT MAIL RETAIL®

Table with columns: 5-Digit ZIP Code, Route Number, # of Mailpieces, 8-Digit ZIP Code, Route Number, # of Mailpieces

Search for Routes

13082 E Manito Rd, Pekin, IL 61554



Radius

2 mi



Search

Clear

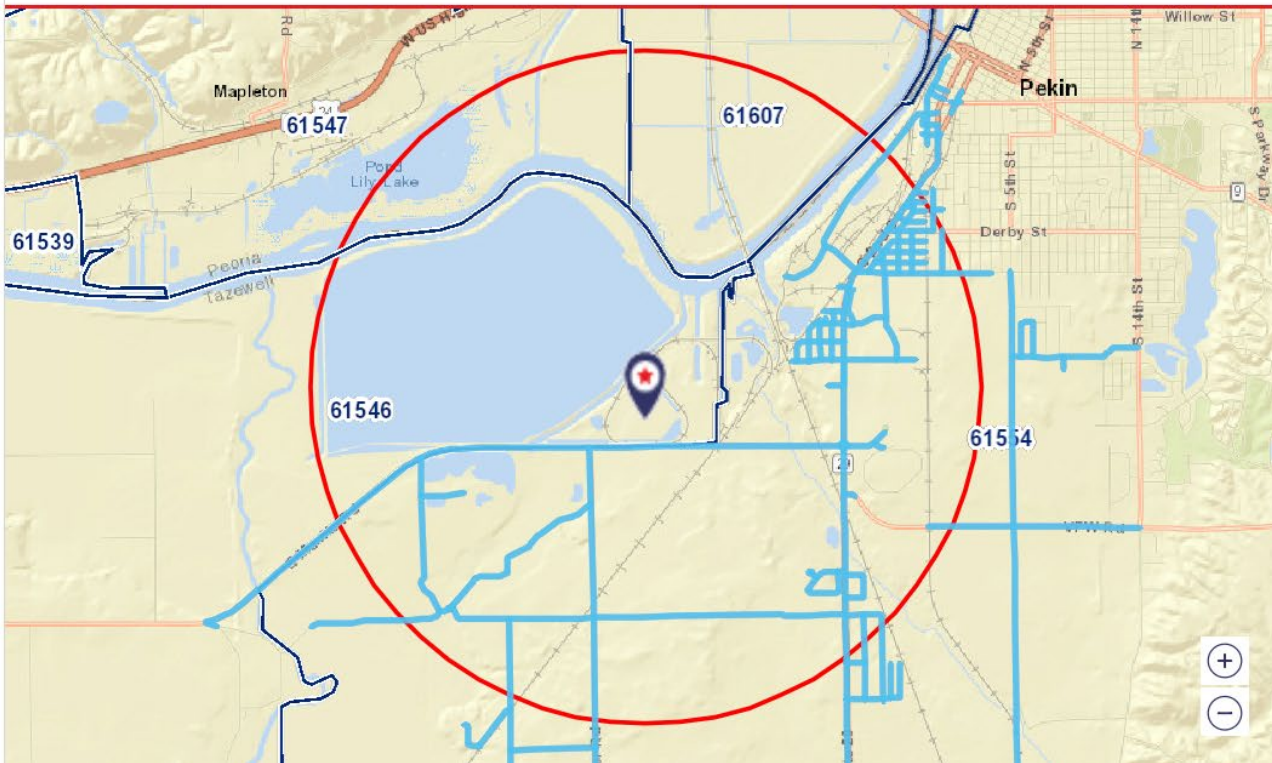


Mailpiece
Size Checker

Refine Search

View as: **Map** **Table**

Route Residential Business Total Age: 0-85+ Size Income Cost



Order Summary

Selected Routes

2

[Post Office™ Drop-Offs](#)

1

Total Mailpieces

1104

Approximate Cost

\$208.66

Next Step

Clear Routes

Search for Routes

Radius

Search

Clear



Mailpiece
Size Checker

Target Audience

View as: [Map](#) [Table](#)

<input type="checkbox"/>	Route	Residential	Business	Total	Age: 0-85+	Size	Income	Cost
<input checked="" type="checkbox"/>	61554-C002	482	69	551	100.0%	2.51	\$36.73k	\$104.14
<input checked="" type="checkbox"/>	61554-R003	510	43	553	100.0%	2.52	\$52.44k	\$104.52

Order Summary

Selected Routes

2

[Post Office™ Drop-Offs](#)

1

Total Mailpieces

1104

Approximate Cost ⓘ

\$208.66

Next Step

Clear Routes

Exhibit C:

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

MWG Community Posting Summary

March 2023

The summary below details actions taken by Midwest Generation to meet Section 845.240 regulations for Pre-Application Public Notification and Public Meetings. These regulations require the owner or operator of a CCR surface impoundment to “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).”

We identified and contacted over 100 conspicuous locations via telephone over two days- Friday, March 17, 2023, and Monday, March 20, 2023. All locations are within 10 miles of the Powerton Generating Station in Pekin, Illinois.

On Thursday, March 23, 2022, we posted public notices in many of these locations. In instances where we did not post a notice, the facilities were closed or refused to allow postings that day. In total, 29 public notice flyers were posted within a 10-mile radius of the City of Pekin – covering surrounding areas including, South Pekin, North Pekin, Mapleton, Creve Coeur, Groveland, Tremont, and East Peoria.

Pekin

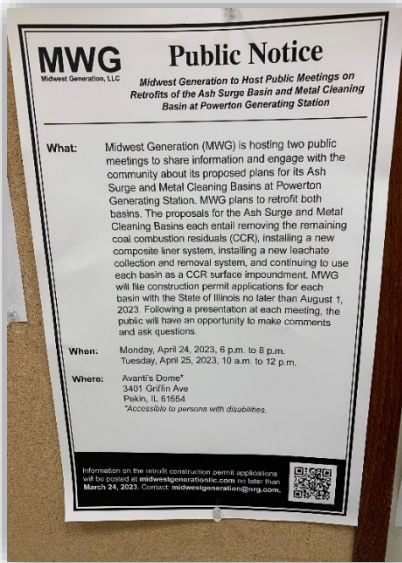
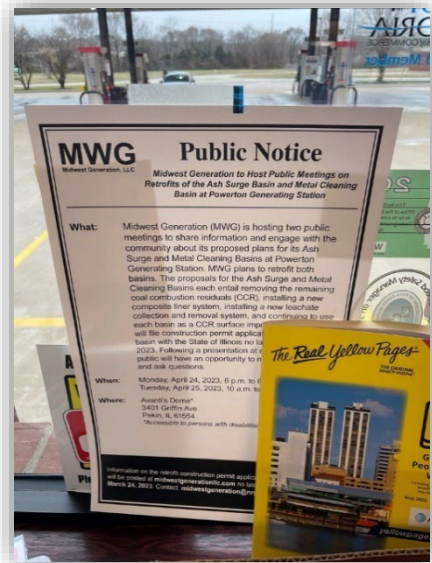
Public meeting notices were placed at **12 locations**, including:

- Pekin Public Library
- Pekin Community Bank
- Pekin City Hall
- Pekin Township Building
- Tazewell County Circuit Clerk
- Grace United Methodist Church
- Starbucks
- Coffee Connection
- Corner Curio
- Casey’s General Store (2 locations)
- Amoco Gas Station

Locations that were closed or refused included:

- Pekin Park District
- Pekin Chamber of Commerce
- St. John’s Church

Pekin Photos



South Pekin

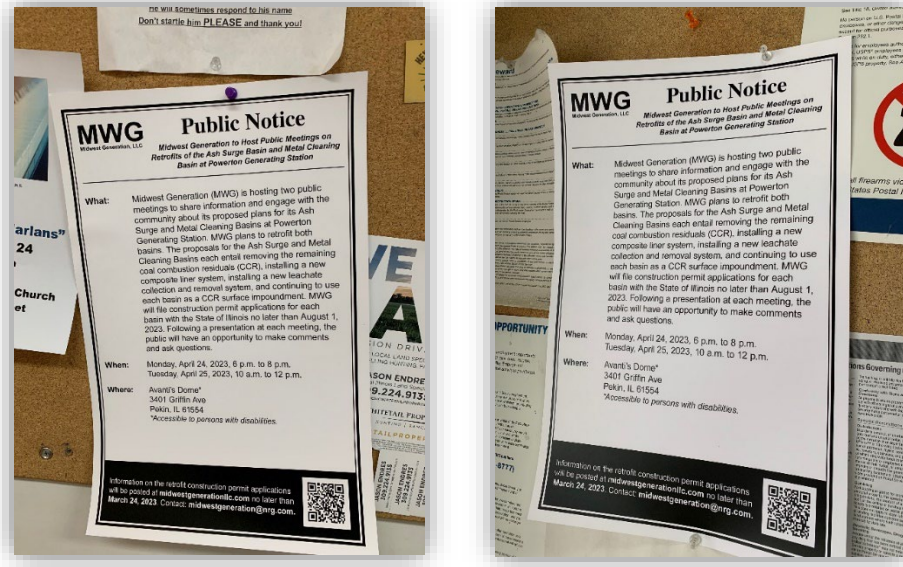
Public meeting notices were placed at **2 locations**, including:

- United States Postal Service
- Casey's General Store

Locations that were closed or refused, included:

- Dollar General

South Pekin Photos



North Pekin

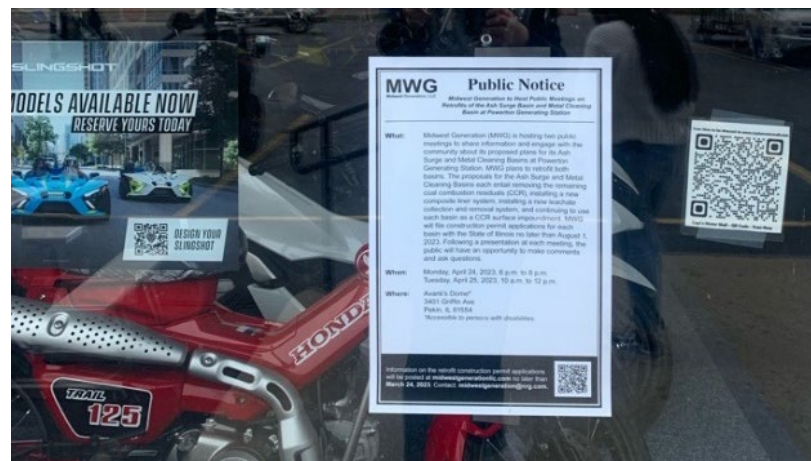
Public meeting notices were placed at 4 locations, including:

- Casey's General Store (2 locations)
- Cupi's Motor Mall
- North Pekin Village Hall

Locations that were closed or refused, included:

- Midwest Chassis, Inc.
- North Pekin Church-Nazarene
- Crosswalk Chapel

North Pekin Photos

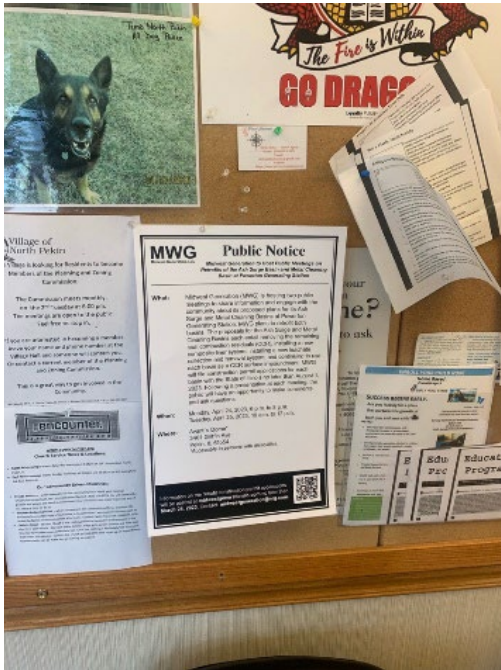


Mapleton

Public meeting notices were placed at **2 locations**, including:

- JB Butlers
- BP Gas Station

Mapleton Photos



Creve Coeur

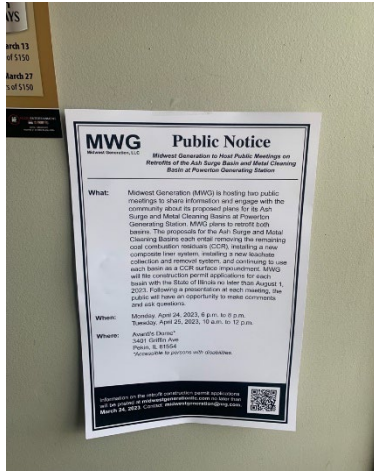
Public meeting notices were placed at **5 locations**, including:

- Casey's General Store
- Larry's Driftwood Pizza
- Darcy's Café & Slots
- Creve Coeur Food Mart
- Dollar General

Locations that were closed or refused, included:

- The Journey Life Center

Creve Coeur Photos



Groveland

Public meeting notices were placed at **1 location**, including:

- Public Library and Township Office

Locations that were closed or refused, included:

- Casey's General Store
- United States Postal Service

Tremont

Public meeting notices were placed at **2 locations**, including:

- United States Postal Service
- Casey's General Store

East Peoria

Public meeting notices were placed at **1 location**, including:

- Casey's General Store

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Exhibit D:

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



Midwest Generation, LLC
Powerton Generating Station
13082 E. Manito Road
Pekin, Illinois 61554

March 21, 2023

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: Powerton Generating Station – Pekin, Tazewell County, Illinois
Facility ID No. W1798010008
Notice of Public Meetings 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 the Ash Surge Basin (ID No. W1798010008-01) and Metal Cleaning Basin (ID No. W1798010008-03) at Powerton Generating Station.

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

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
Todd Mundorf, Powerton Station Plant Manager
Joseph Kotas, Powerton Station Environmental Specialist
Jill Buckley, Environmental Manager

Exhibit E:

Presentation for April 24 and 25, 2023
public meetings

**POWERTON GENERATING
STATION RETROFIT
*Permit Applications***

ID No. W1978010008

April 2023

Ash Surge Basin Proposed Retrofit Construction Project
Metal Cleaning Basin Proposed Retrofit Construction Project

Safety is of the utmost importance to us, and we continue to follow public health guidance while putting the well-being of our team and communities first.

- No mask requirements in place in Illinois, but if you feel more comfortable wearing one today, please, we encourage you to do so.
- Hand sanitizer around the room.
- Plenty of room and extra seating so that those who are here with us today can socially distance.

In the unlikely event of an emergency, doors around the room are marked with exit signs that you may use.

If you would like to receive a summary of this meeting or be added to the Illinois Environmental Protection Agency's listserv, visit the sign in table to provide your contact information.



- ✓ Illinois Coal Ash & Other Environmental Rules
- ✓ Powerton Generating Station
- ✓ Proposed Retrofit Plans – Ash Surge Basin & Metal Cleaning Basin
- ✓ Question & Answer Session

- 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.
- Additionally, both the Ash Surge Basin and Metal Cleaning Basin are permitted as part of the Station's wastewater treatment system by the Illinois EPA under the NPDES permitting program.

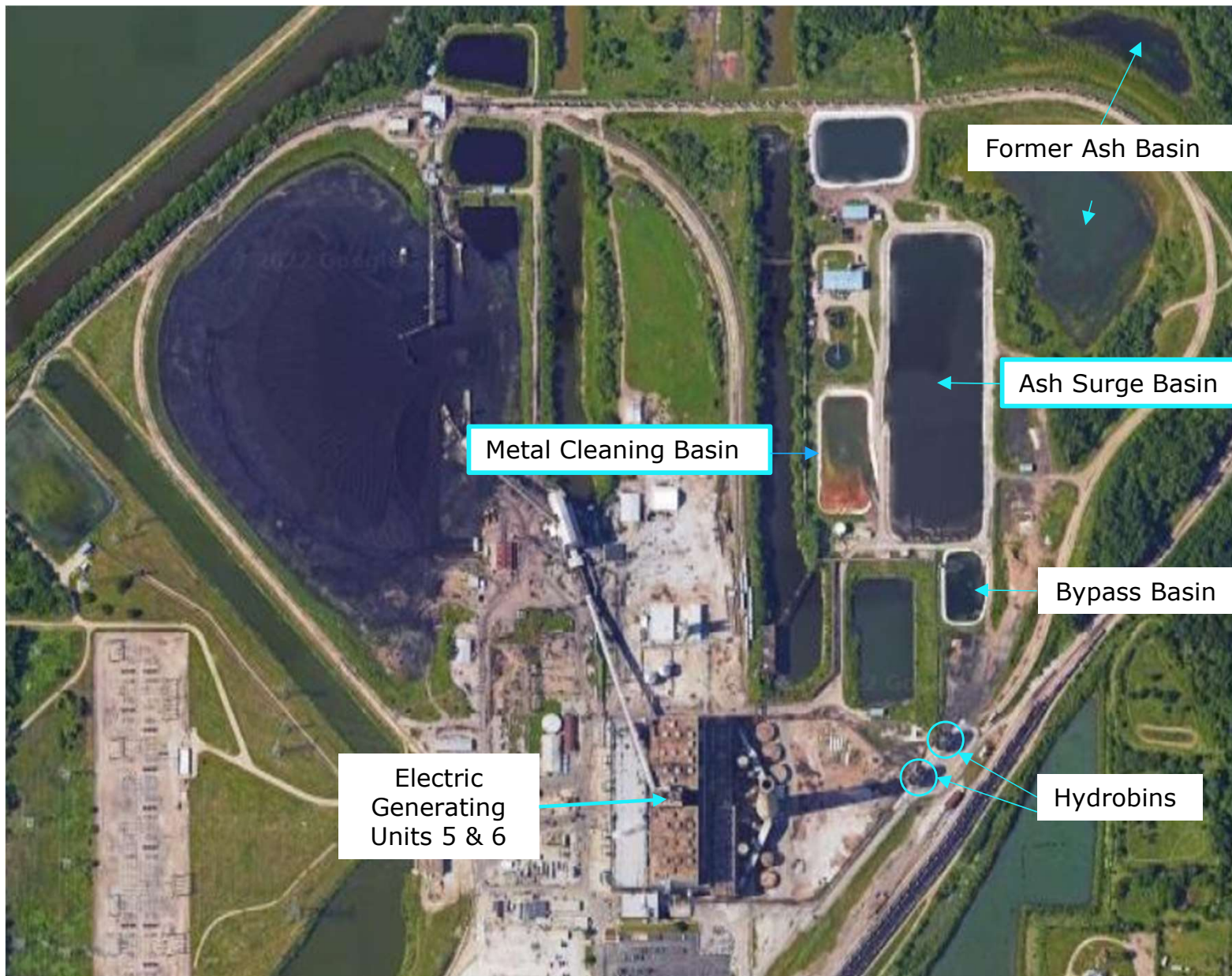
- The Illinois Coal Ash Rules define both CCR and CCR surface impoundments:

- "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 retrofits of the Ash Surge Basin and the Metal Cleaning Basin at Powerton Generating Station.

Public Meetings were held in May 2022 to discuss the planned closure of the Former Ash Basin (FAB) and retrofit of the Bypass Basin. Construction permit applications for those basins were submitted to Illinois EPA in June 2022 for the Bypass Basin and July 2022 for the FAB. The Agency has not yet acted on those applications.



Ash Surge Basin

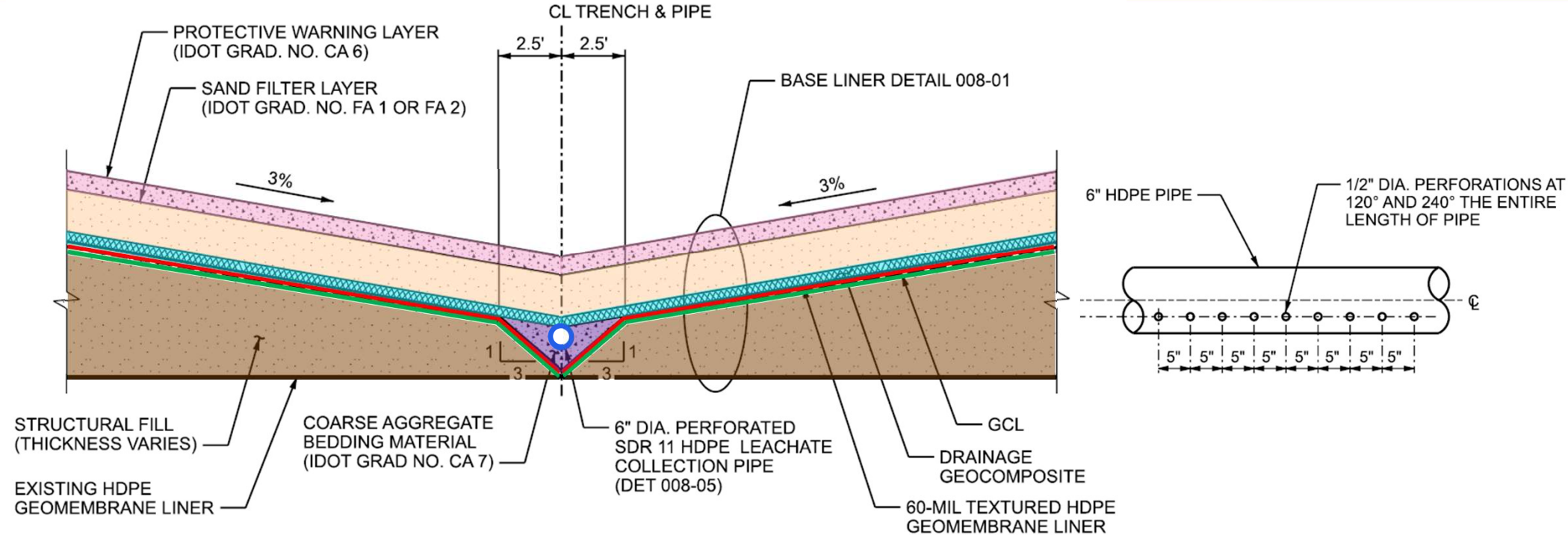
- The Ash Surge Basin (ASB) is used as the primary settling basin for CCR and other process wastewaters at Powerton Station.
- The ASB is approximately 8 acres in size and was originally built in 1978 with a Hypalon membrane liner.
- The ASB was relined with a high-density polyethylene (HDPE) geomembrane liner in 2013.
- CCR stored in the ASB is slag, or bottom ash, which is the non-combustible residue that settles to the bottom of the power plant's boilers.
- A demonstration for a "Site-Specific Alternative Deadline to Initiate Closure" was submitted to the USEPA in November 2020, allowing for the continued operation of the ASB until the Bypass Basin is retrofitted.

Metal Cleaning Basin

- The Metal Cleaning Basin (MCB) is used to collect and treat boiler cleaning wash waters during boiler outages. Outside of outages, the MCB is also occasionally used to temporarily store fly and bottom ash from maintenance activities. The MCB does not store wash waters and ash at the same time.
- The MCB is approximately 2.3 acres in size and was originally built in 1978 with a Hypalon membrane liner.
- The MCB was relined with a high-density polyethylene (HDPE) geomembrane liner in 2010.
- CCR stored in the MCB include fly ash and bottom ash/slag (short term).

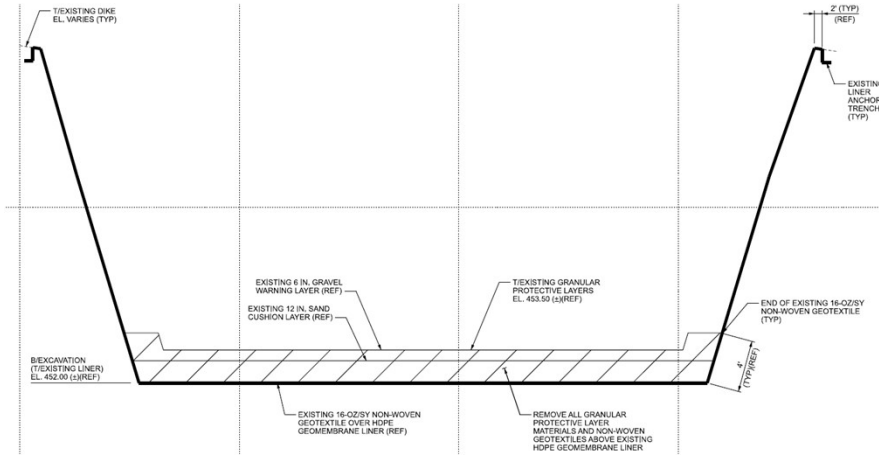
- While both basins have (intact) 60-mil HDPE geomembrane liners, neither basin has a composite liner system as required under both IL and federal regulations.
- MWG's current plans are to retrofit the Ash Surge Basin once the Bypass Basin is retrofitted and placed back into service, and to retrofit the Metal Cleaning Basin as soon as a permit is received.
- This plan allows for continued operation of Powerton Station as a reliable source of electricity.

Retrofitted CCR Surface Impoundments Alternative Liner Requirements

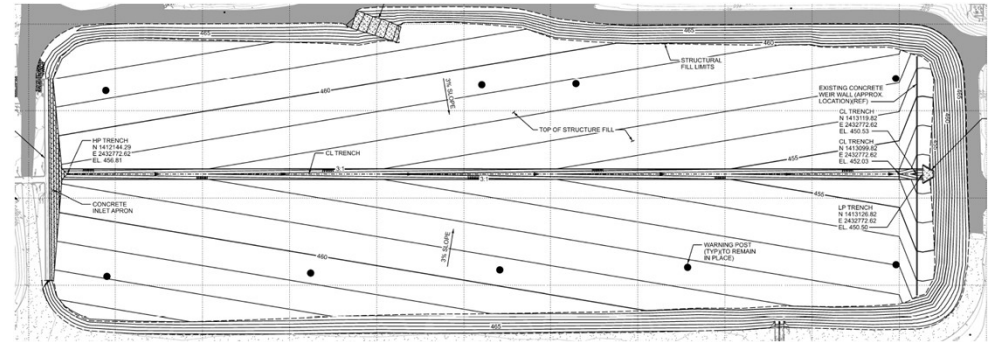


Component	Layer / Feature	Description	Reference(s)
Basin Floor	Structural Fill	Fill material to establish 3% slope for LCRS	845.420(a)(3)
Composite Liner System	Geosynthetic Clay Liner (GCL)	Bottom component of new composite liner system	845.410(a) & (b) 845.400(c)
	60-mil HDPE Geomembrane Liner	Top component of new composite liner system	845.410(a) & (b) 845.400(c)
Leachate Collection & Removal System (LCRS)	Drainage Geocomposite	Directs leachate to leachate collection pipe	845.420(a)(4)(B)
	Perf. HDPE Leachate Collection Pipe	Collects and directs leachate to discharge pipe or sump pump	845.420(a)(7)
	Coarse Aggregate Bedding Material	Prevents finer particles from clogging the leachate collection pipe	845.420(a)(6)
	Sand Filter Layer	Limits intrusion of finer CCR particles into LCRS	845.420(a)(2)
	Protective Warning Layer	Protects liner and LCRS components	845.420(a)(8)

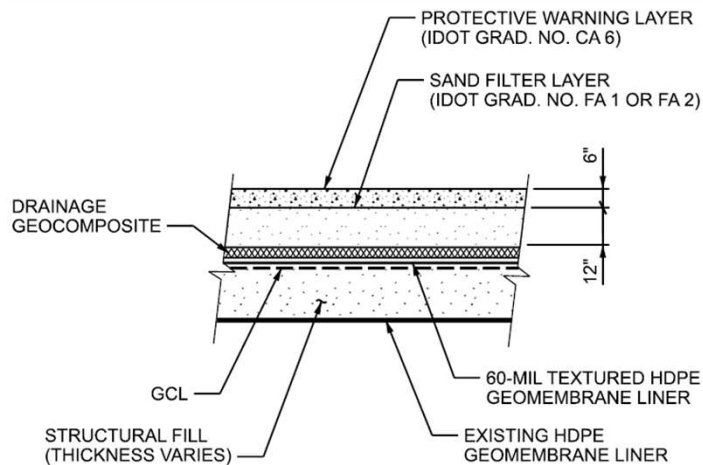
1. Material Removal & Decontamination



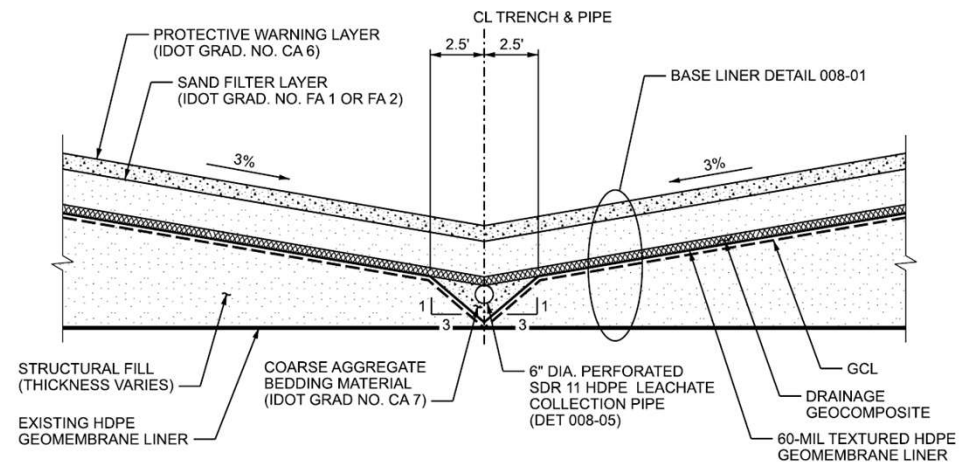
2. Place Structural Fill



3. Install New Composite Liner

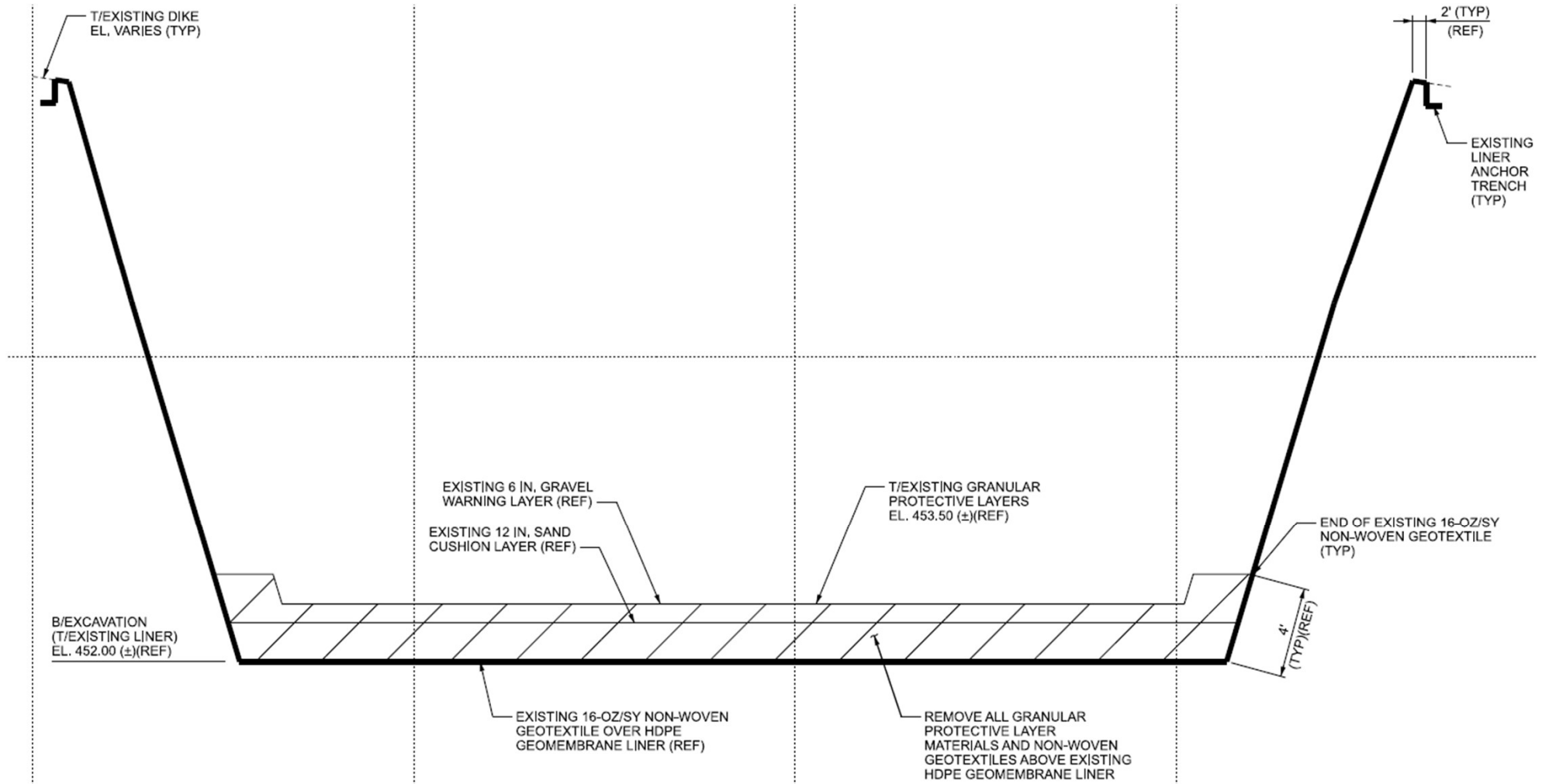


4. Install New Leachate Collection System

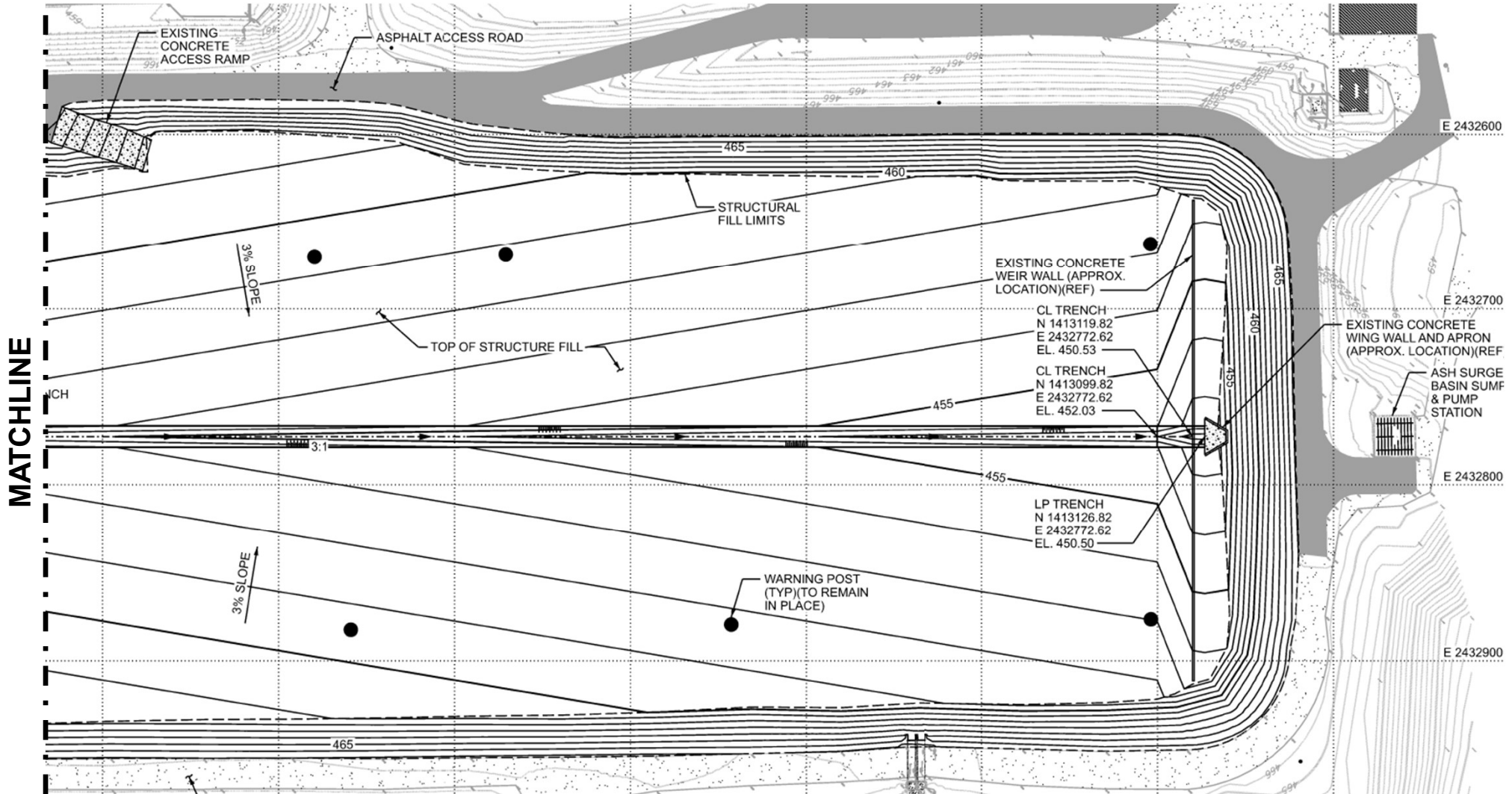


TYPICAL SECTION AT LEACHATE COLLECTION TRENCH

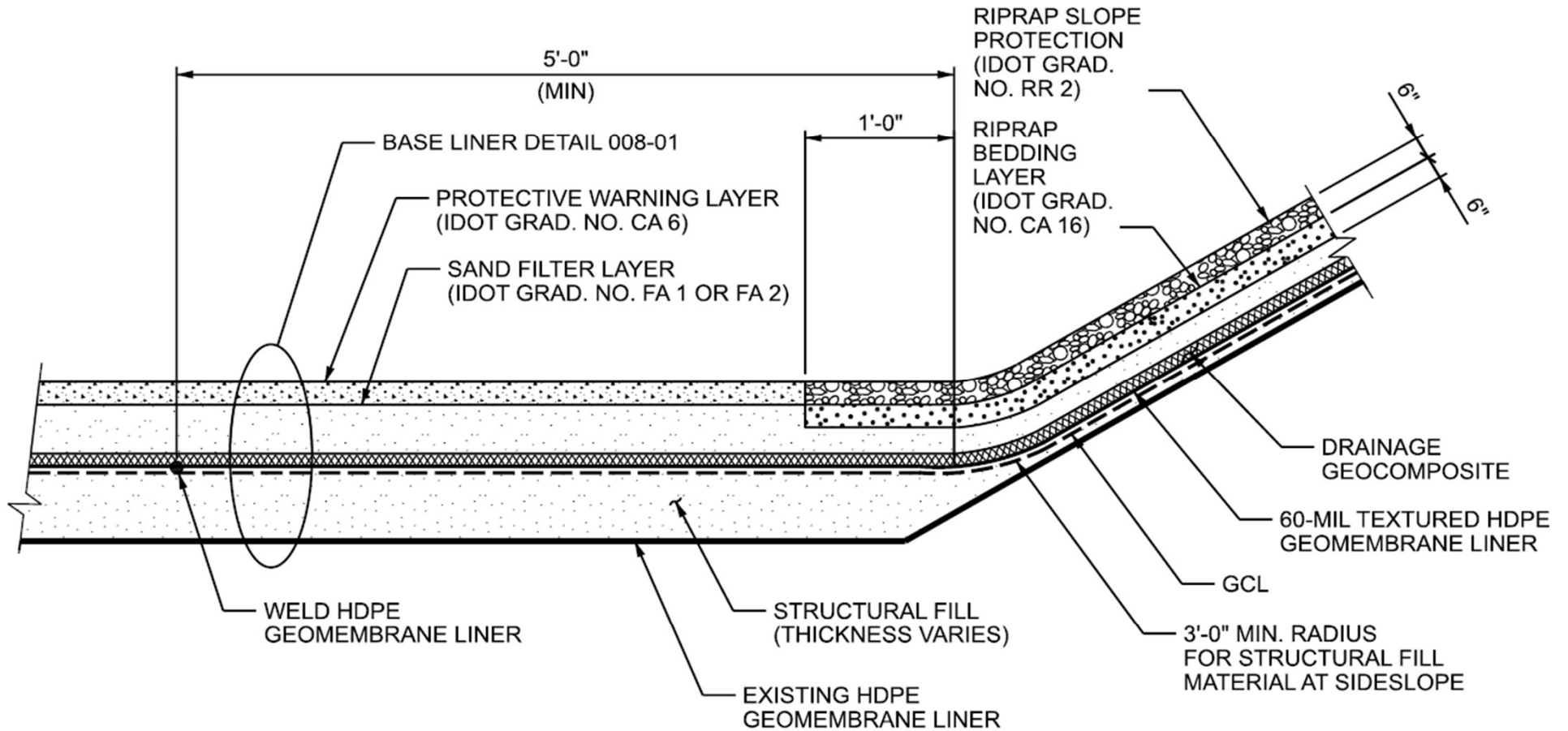
1. Material Removal & Decontamination (Ash Surge Basin)



2. Place Structural Fill (Ash Surge Basin)

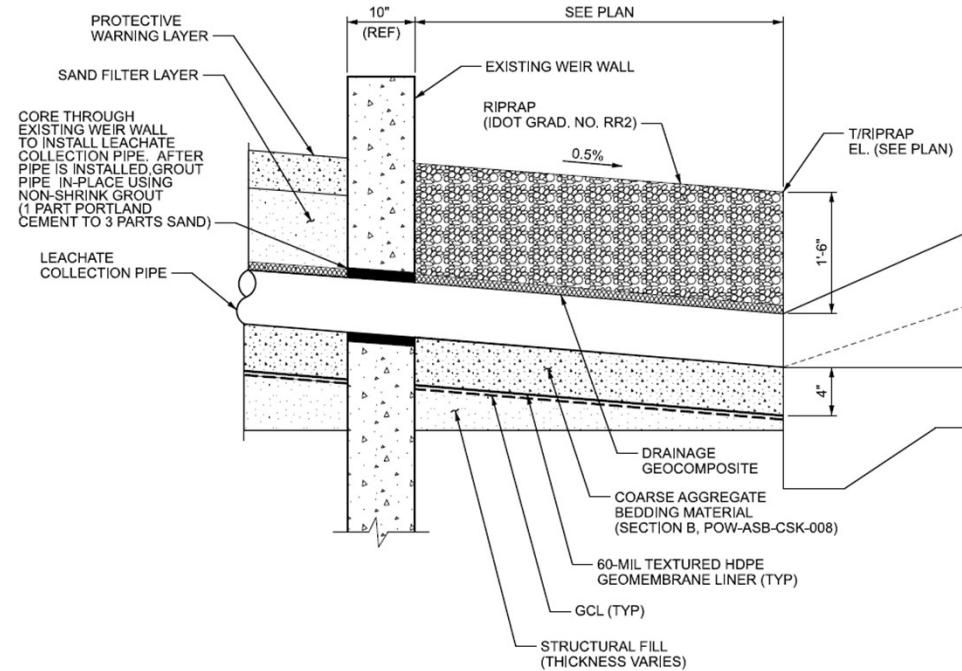
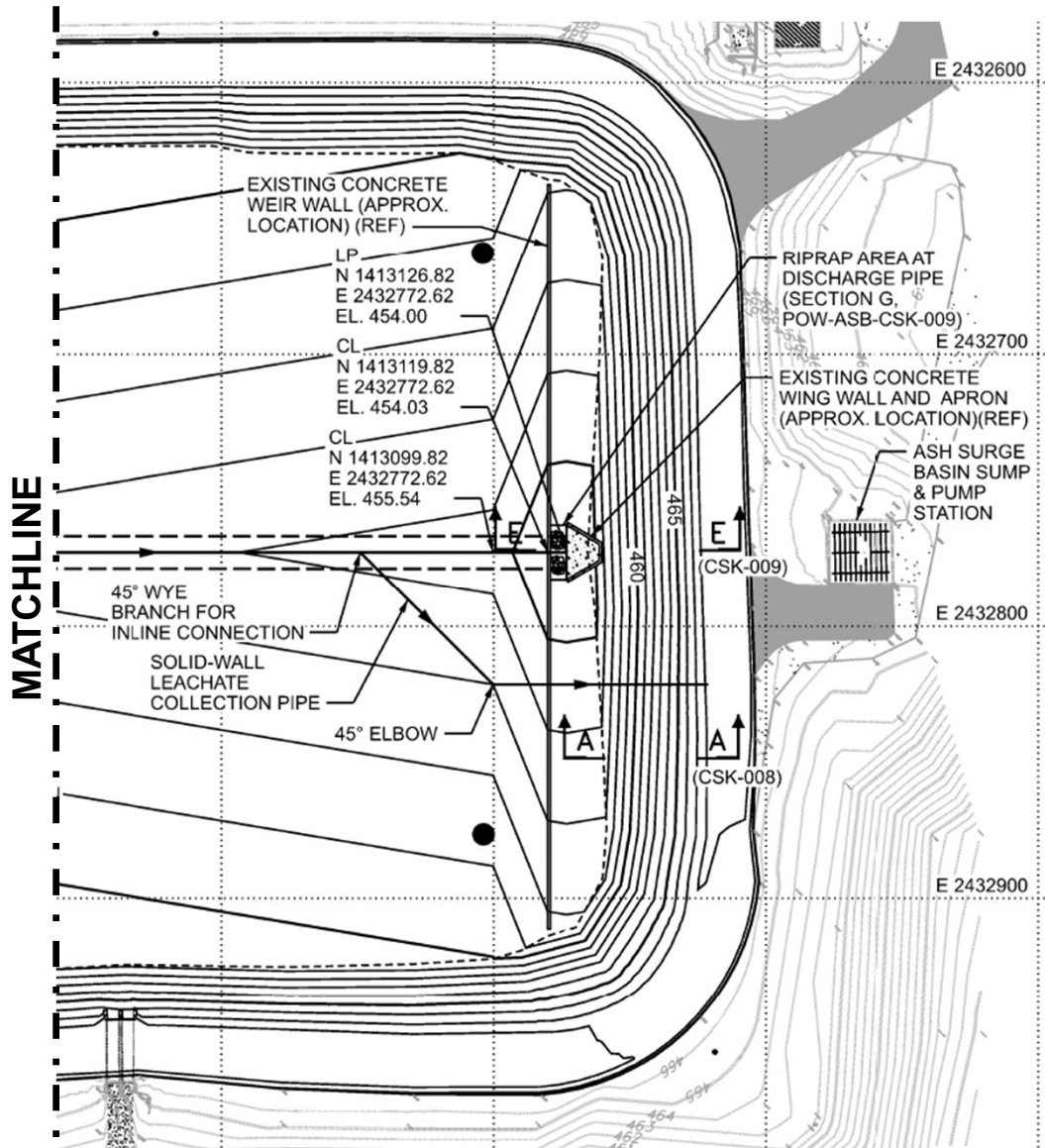


3. Install New Composite Liner (Ash Surge Basin)

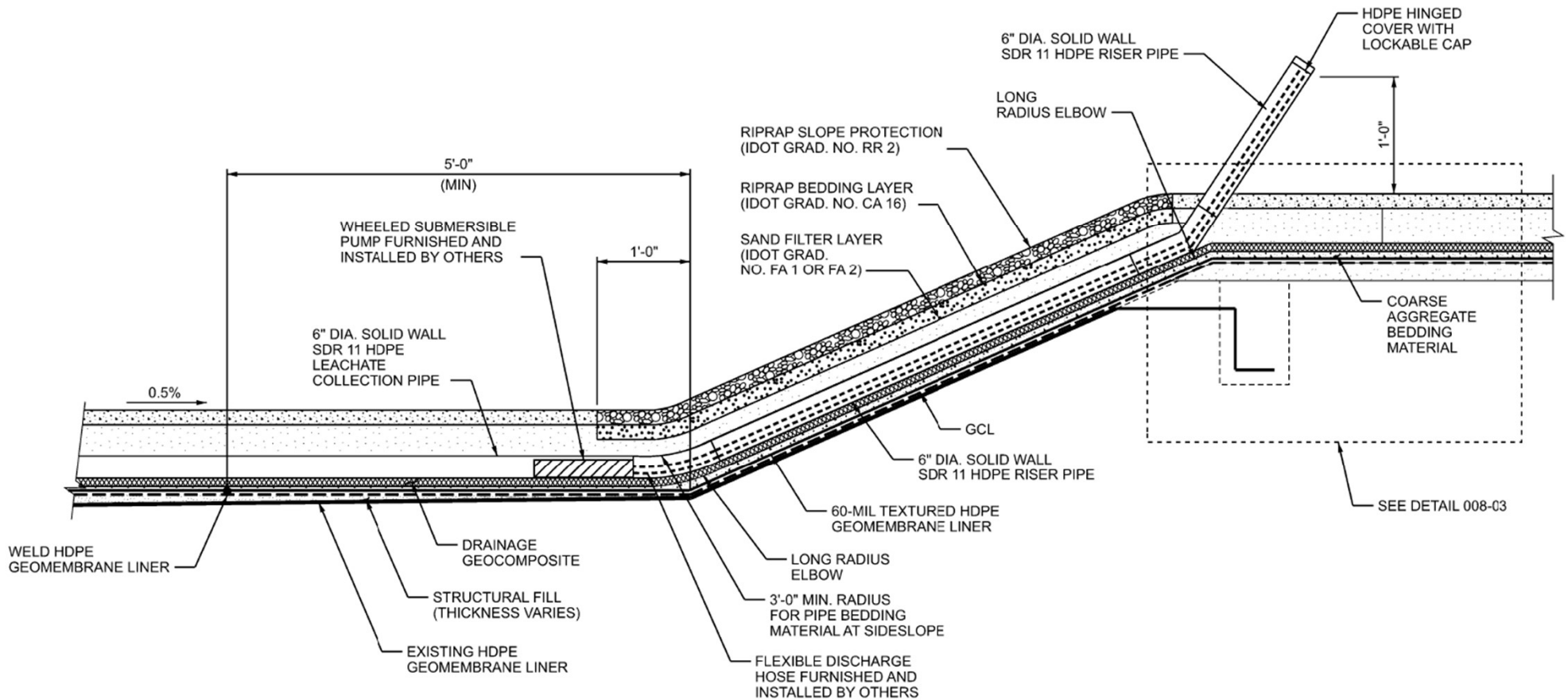


TYPICAL SLOPE TRANSITION DETAIL

4. Install New Leachate Collection System (Ash Surge Basin)



4. Install New Leachate Collection System (Ash Surge Basin)



- MWG estimates that after receipt of a construction permit, it will take approximately 13 months to retrofit the Ash Surge Basin and approximately 8 months to retrofit the Metal Cleaning Basin. More detailed planning level schedules are included in each basin's Retrofit Plan.
- Once retrofitted, each basin will continue to be used for its current purpose - the Ash Surge Basin will be used to store CCR remaining in the decant water from the Station's hydrobins and the Metal Cleaning Basin will be used to treat boiler wash waters and/or for temporary storage of ash.
- Groundwater monitoring will continue during the operating life and required post-closure care period for the retrofitted Ash Surge and Metal Cleaning Basins.

Public Website: midwestgenerationllc.com

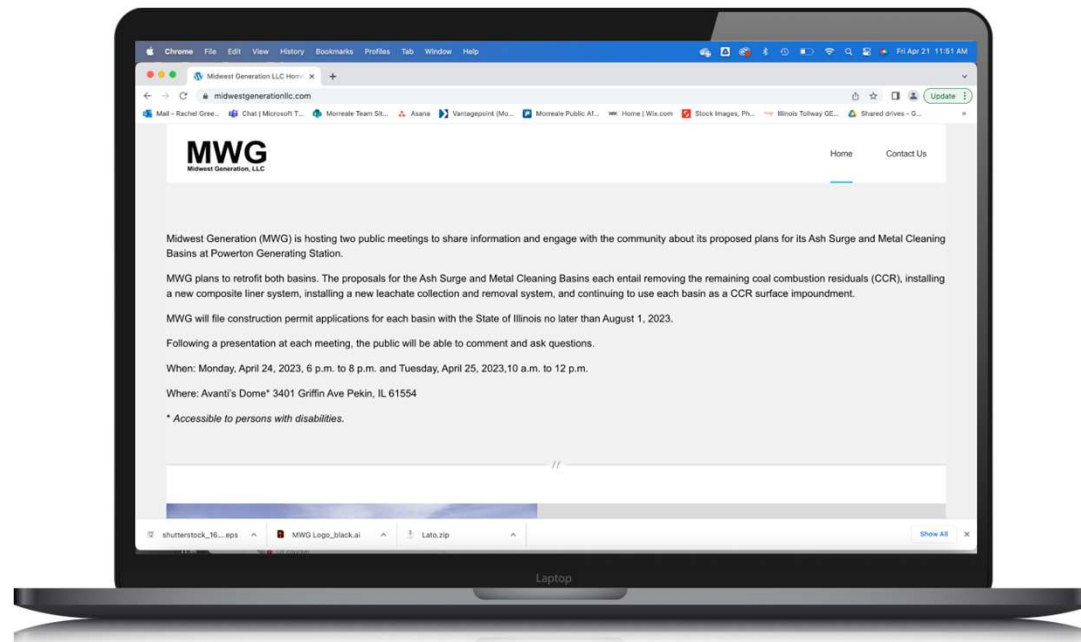


Exhibit F:

Summary of public meetings

**Midwest Generation, LLC
Powerton Generating Station
Ash Surge Basin Retrofit and Metal Cleaning Basin Retrofit
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 for retrofits of Powerton Generating Station’s Ash Surge Basin and Metal Cleaning Basin 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 public meeting notice was also mailed to all residents within two miles of the facility on March 23, 2023, which totaled 1,104 residential mailing addresses. The notice was also posted in 29 public locations within 10 miles of the facility boundary.

The public meetings for Powerton Generating Station’s Ash Surge Basin and Metal Cleaning Basin were held on April 24, 2023 from 6:00 p.m. to 8:00 p.m. and on April 25, 2023 from 10:00 a.m. to 12:00 p.m. The meetings were held in person. Two members of the public attended the April 24th meeting. Seven members of the public, including one who attended the previous meeting, attended the April 25th 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 form provided at the meeting. All attendees requested a copy of the meeting summary and transmittal of their email address to the Agency to be added to the Agency’s listserv for the facility. All email addresses received will be transmitted to the Agency. After an introduction and approximate 30-minute presentation on the proposed retrofit construction plans, the public was given approximately 1.5 hours 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 retrofit the Ash Surge Basin and Metal Cleaning Basin by removing the remaining material in the basin, retaining and decontaminating the existing geomembrane liner as an additional protective layer under the new composite liner system, and installing a new composite liner system and leachate collection and removal system.

SUMMARY OF ISSUES AND QUESTIONS RAISED DURING THE MEETING

Retrofit Design and Process

Questions were asked about the longevity of the retrofitted ponds. The HDPE geomembrane liner and geosynthetic clay liner materials proposed to be used in the retrofit plans are designed to meet the standards outlined by the U.S. Environmental Protection Agency and Illinois EPA in their respective CCR Rules. These liners are used in many environmental applications across the country and ongoing research estimates these geosynthetic materials, which will be covered, can last hundreds of years.

Questions were asked about the leachate collected after the retrofit and how it is treated. Leachate collected after the retrofit of the ponds will be collected, treated, and discharged via the Powerton Station's NPDES wastewater permit.

A question was asked about the retrofit timelines. The current plan is to retrofit the Metal Cleaning Basin first, followed by the Ash Surge Basin. While MWG will attempt to retrofit both the Ash Surge and Metal Cleaning Basins in parallel, construction cannot begin until permits are issued by the Illinois EPA, and limits on materials delivery and availability of contractors may prohibit this.

A question was asked about how the liner will be protected from damage during the decontamination and retrofit processes. There are two common methods that a contractor could use to remove material above the basins' existing liners: (1) traditional excavation and (2) hydro-excavation. Under a traditional excavation, the contractor could use front-end loaders, excavators, or other conventional excavation equipment with rubber-surfaced buckets, blades, etc. to protect the existing geomembrane liners as material is removed from the sideslopes and floors of the basins. Under a hydro-excavation, the contractor could use specialized equipment to apply pressurized water to break-up the existing materials and an industrial vacuum to remove the broken-up material, all while avoiding damage to the existing geomembrane liners. Ultimately, the means and methods used to decontaminate the basins' existing geomembrane liners will be determined by the contractor hired by MWG to retrofit the basins. Regardless of the actual means and methods implemented, the contractor will be responsible for taking all necessary precautions to avoid damaging the basins' existing geomembrane liners. In the rare instance where an existing liner is accidentally damaged, the contractor will be responsible for assessing the extent of the damage and patching the damaged area(s).

A question was asked about the size of the retrofitted basins. The footprints of the retrofitted basins will be the same as the current basins: the Ash Surge Basin is approximately 8.4 acres and the Metal Cleaning Basin approximately 2.3 acres in size. The overall footprints will not change.

A question was asked about ash handling during the retrofit process. Any ash that is removed from the pond during the retrofit construction process will be dewatered and sent off-site to a permitted landfill or beneficial use site.

A question was asked whether the material that underlies the current HDPE geomembrane liners of the ponds will be remediated during the retrofit process. The plan for retrofitting the Ash Surge and Metal Cleaning Basins does not include testing of soils beneath the HDPE geomembrane liner unless tears in the liner are discovered which may indicate the potential release of contaminants into the subgrade. The competency of the pond's existing HDPE geomembrane liners will be verified by conducting an electrical leak location survey, which involves placing a voltage across the entire liner and using a detection probe to determine whether any tears are present in the liner. Where a tear is present, the probe will identify an electrical current flowing through the tear. If a tear is discovered, the soils under the tear will be inspected to determine whether any contaminants have been released into the basin subgrade. Contaminated soils identified during this inspection will be removed and replaced with structural fill.

Groundwater Monitoring

Questions were asked about remediation plans for CCR constituents that may leak into groundwater. The Illinois CCR Rule outlines a corrective action process that would be implemented should groundwater monitoring identify a release of CCR constituents into groundwater. The process includes notification to the Illinois EPA, characterization of the nature and extent of the release, development of an assessment of corrective measures, public meetings, and submittal of a corrective action plan permit application. The corrective action plan must be approved by the Illinois EPA in the form of an issued permit. Once the permit is granted, corrective action would commence. Groundwater monitoring is conducted quarterly, as required by the Illinois CCR Rule.

Current Design

A question was asked about the separation distance between the groundwater and bottom of the ponds. The Metal Cleaning Basin's base is at least five feet above the upper limit of the site's uppermost aquifer. The Ash Surge Basin's base is within five feet of the upper limit of the site's uppermost aquifer, but there is no intermittent, recurring, or sustained hydraulic connection between any portion of the base of the Ash Surge Basin and the uppermost aquifer due to normal fluctuations in groundwater elevations. Therefore, both the Ash Surge Basin and Metal Cleaning Basin meet the Illinois CCR Rule's required separation between a CCR surface impoundment and the upper limit of the uppermost aquifer.

A question was asked about whether the sides of the ponds are lined. The sides of both ponds are currently lined with a 60-mil high density polyethylene (HDPE) liner and will also be lined with a composite liner system required by the Illinois CCR Rule once retrofitted.

Metal Cleaning Basin

A question was asked about an orange area visible on the overview map of the station slide and whether the color was indicative of acid mine drainage and high metals. The area in question was the south end of the Metal Cleaning Basin. Due to nature of the boiler wash water sluiced to the Metal Cleaning Basin, there are some metals in that wastewater; however, the water is treated via a wastewater treatment process to remove metals prior to discharge through the Station's NPDES permitted discharge. The clarifier solids are disposed in a permitted landfill or are beneficially reused.

A question was asked about beneficial use of ash in mine reclamation processes. The ash is sampled to ensure it meets the requirements and specifications of the end users.

Written Comments

The Central Illinois Heathy Community Alliance presented a letter addressed to MWG and Illinois EPA at the April 25th meeting, signed by Tracy Fox. With regard to the issues raised in that letter, MWG has no indication that soils beneath either basin are "damaged" and require remediation. Additionally, as stated above, ash that is removed from either basin during the retrofit process will be sent off-site to either a permitted landfill or beneficially reused. Midwest Generation, LLC is fully committed to complying with environmental laws and regulations.

Future

A question was asked about whether carbon capture sequestration was an option at the Powerton Station. MWG is not currently planning carbon capture sequestration at Powerton Station.

General concerns were raised about potential future impacts to the ponds due to climate change, such as groundwater level fluctuations and flooding, historic fill, and impacted soils under the basins. During the useful life of the impoundments and throughout the closure and post-closure care periods (if applicable), groundwater monitoring will continue, which includes monitoring and reporting the groundwater levels in the monitoring wells. Additionally, the impoundments will continue to be inspected by qualified staff and annually by a certified Professional Engineer. MWG has no evidence that groundwater levels around the impoundments at Powerton Station is rising, year-over-year.

SUMMARY OF REVISIONS, CHANGES, AND CONSIDERATIONS

Public engagement is an important part of the permitting process. Midwest Generation, LLC valued the opportunity to hear and consider the comments of community members and others who participated in the public meetings. At this time, Midwest Generation is proceeding with the

proposal for retrofitting the Ash Surge Basin and the Metal Cleaning Basin as presented at the public meetings. Taking public comments into consideration, the current analysis continues to indicate that the proposed plan – which remains subject to regulatory review and approval – prioritizes the environment and community well-being.