CLOSURE PLAN
FORMER ASH BASIN
POWERTON STATION
APRIL 2018

This closure plan has been prepared in accordance with 40 CFR Part 257.102(b) for the Former Ash Basin (FAB) at the Powerton Station, operated by Midwest Generation, LLC (Midwest Generation) in Pekin, IL. This closure plan describes the schedule and steps necessary for closure and methods for compliance with closure requirements for final closure of the FAB.

1.0 Closure Narrative [257.102(b)(i)]

The closure of the FAB will be by removal of the CCR from the North Pond in accordance with 40 CFR Part 257.102(c) along with placement and closing of the CCR in place in the South Pond in accordance with 40 CFR Part 257.102(d).

2.0 CCR Removal and Decontamination [257.102(b)(1)(ii)]

Closure of the FAB will be through removal of CCR from the North Pond and consolidated with the CCR in the South Pond. The CCR will be removed through dredging the North Pond. The dredging will mix the CCR with the existing standing water in the pond so that it can be extracted. This slurry will be pumped through HDPE pipes connecting the North and South ponds and into the South Pond. After the dredging in the North Pond is complete, it will be dewatered, and any CCR remnants will be removed in accordance with 40 CFR Part 257.102(c).

CCR removal and decontamination will be considered complete when CCR has been removed from the North Pond and from any areas that may have been affected by releases from the pond and groundwater monitoring concentrations do not exceed the groundwater protection standards established in 40 CFR Part 257.95(h) for constituents listed in Appendix IV for two consecutive sampling events using the statistical procedures in §257.93(g).

3.0 Closure with CCR Left in Place [257.102(b)(1)(iii)]

The CCR in the South Pond will be closed in place in accordance with 40 CFR Part 257.102(d). As required, a final cover system (FCS) will be installed over the CCR in accordance with 257.102(d)(3)(ii). The closure will be implemented using the following methods and procedures:

1. Stormwater conveyance piping will be installed from the South Pond to the North Pond;

2. Any liquids accumulated in the South Pond from the dredging will be removed as necessary, which could include pumping to the North Pond;

3. The CCR in the South Pond will be graded to a more uniform elevation to allow for the placement of the FCS. The CCR will be compacted to stabilize it prior to placement of the FCS and to reduce the potential for future settling;

4. The FCS will be installed over the regraded and compacted CCR. The FCS will consist of the following components (from the bottom layer to the top layer):
    - An infiltration layer consisting of a clay layer or an equivalent with a permeable no greater than $1x10^{-5}$ cm/sec;
    - A protective soil cover ranging from 6" to 18" thick of imported clean material;
    - An erosion control layer consisting of six (6") inches of topsoil with vegetation (mulch, fertilizer, and seed); or
    - A synthetic turf layer with sand infill.

4.0 Maximum Inventory of CCR [257.102(b)(1)(iv)]

The estimated maximum inventory of CCR on-site contained in the North Pond and South Pond are estimated at less than 300,000 cubic yards (CY) and 200,000 CY, respectively.

5.0 Largest Area of CCR Requiring a Final Cover [257.102(b)(1)(v)]

The North Pond of the FAB will be closed by removing the CCR in accordance with 257.102(c); therefore, this section is not applicable to the North Pond. The South Pond will be closed with CCR in place and the FCS will cover a maximum area of approximately 12.5 acres.

6.0 Closure Schedule [257.102(b)(1)(vi)]

Implementation of closure of the FAB is estimated to require 18 months. Closure is anticipated to begin in 2019 and estimated to be completed in 2020. Prior to initiation of closure, a notice of intent to close will be prepared in accordance with §257.102(g). If necessary, 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, and may 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 is included below.

Closure Schedule

Activity No.	Closure Activity	Schedule
1	Site Preparation	1 month
2	CCR Consolidation	12 months
3	Install Cover Cap	3 months
4	Permanently Stabilize Site	1 months
5	Closure Certification	1 month

7.0 Closure Activities Initiation [257.102(e)]

Closure activities will commence when one or more of the following conditions have 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).

8.0 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 FAB 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).

9.0 Professional Engineer's Certification [257.102(b)(4)]

This Closure Plan has been prepared to meet the requirements of 40 CFR 257.102(b)(1).

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