

**POST-CLOSURE PLAN  
FORMER ASH BASIN  
POWERTON STATION  
MARCH 2018**

This post-closure plan has been prepared in accordance with 40 CFR Part 257.104(d) for the Former Ash Basin (FAB) at the Powerton Generating Station, operated by Midwest Generation, LLC (Midwest Generation), in Pekin, IL. This post-closure plan describes the steps necessary for post-closure and methods for compliance with post-closure requirements for the FAB. The post-closure care period will begin once the construction completion report documenting the closure of the FAB has been approved by the Illinois Environmental Protection Agency (IEPA) and Midwest Generation has placed the certified notification of closure as required by 257.102(f)(3) in Powerton's operating record.

**1.0 POST-CLOSURE MONITORING AND MAINTENANCE DESCRIPTION**  
**[257.104(d)(1)(i)]**

The North Pond is not subject to the post-closure care requirements in accordance with 40 CFR Part 257.104(2) because the CCR will be removed in accordance with 40 CFR Part 257.102(c).

For the South Pond, the post-closure monitoring and maintenance activities will be performed in compliance with 257.104(b). The post-closure care will consist of the following:

- Maintaining the integrity and effectiveness of the final cover system (FCS), including making repairs as necessary; and
- Maintaining the groundwater monitoring system and monitoring the groundwater in accordance with 257.90 through 257.98.

In accordance with 257.104(b)(1), the FCS will be inspected annually for settlement/subsidence that could damage the geomembrane or engineered turf and erosion of the sand infill. The FCS will be repaired in accordance with the manufacturer's recommendations if any of the above conditions are observed. If settlement or subsidence is observed, the potential for ponding of stormwater should be evaluated. If it is determined that the potential for ponding of stormwater will be detrimental to the proper function of the FCS, then as much of the FCS as needed should be removed and the CCR should be regraded. This should be done based upon guidance from the manufacturer. If the settlement or subsidence does not detrimentally affect the functionality of the FCS, then the engineered turf and geomembrane will be inspected for rips/tears and the CCR will not be regraded. If rips/tears to the engineered turf and/or geomembrane are noted, then they will be repaired by an approved ClosureTurf installer. Erosion of the sand infill that causes the engineered turf backing to become exposed will be brushed back into the exposed turf backing areas. If erosion of the sand infill repeatedly occurs in the same areas then that portion of the sand infill will be reinforced with a concrete sealant or ArmorFill in accordance with the manufacturer's recommendations.

Groundwater monitoring will be performed in accordance with 257.90 through 257.98 for the

duration of the post-closure period. The groundwater monitoring plan for the FAB in Appendix B details how the groundwater monitoring will comply with 257.90 through 257.98. Groundwater sampling will be conducted at a minimum of semi-annually (detection monitoring) during the post-closure care period. The groundwater sampling and analysis methods will be appropriate for environmental groundwater monitoring (257.93(b)).

This post-closure care plan is based upon the regulatory requirement to maintain and monitor the site for 30 years after closure. If at the end of the 30-year post-closure care period, the groundwater monitoring activities are still conducting “assessment monitoring” in accordance with 40 CFR Part 257.95, the post-closure care monitoring and maintenance will continue until the groundwater monitoring can return to detection monitoring in accordance with 40 CFR Part 257.94.

## **2.0 POST-CLOSURE CARE CONTACT INFORMATION** **[257.104(d)(1)(ii)]**

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## **3.0 PLANNED USES OF THE PROPERTY** **[257.104(d)(1)(iii)]**

The FAB will not be developed during the post-closure care period. The South Pond will contain the CCR closed in place and the North Pond will be used to manage stormwater from the South Pond. The FAB will be inactive during the post-closure care period and it will only be accessed to perform groundwater monitoring or inspections, as noted above. The groundwater monitoring will not involve access onto the FCS. Access onto the FCS for inspections will be kept to a minimum.

## **4.0 CLOSURE PLAN AMENDMENTS** **[257.102(b)(3)]**

This Post-Closure Plan may be amended in accordance with §257.104(d)(3) if a change in the operation of the FAB would substantially affect the content of this Post-Closure Plan or if unanticipated events necessitate revision of the plan. If a change in operation requires amendment to the Post-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 post-closure activities have commenced. Amendments to this Post-Closure Plan will be certified by a professional engineer registered in the State of Illinois in accordance with §257.102(b)(4).