

**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.