

MWVG

Midwest Generation, LLC
Waukegan Generating Station

East Ash Pond Post-Closure Plan

June 11, 2021

Issue Purpose: Use

Project No.: 12661-098

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1.0 INTRODUCTION & PURPOSE

Federal CCR Rule Reference: 40 CFR 257.104(d)

Pursuant to 40 CFR 257.104(d), this document provides the written post-closure plan for the East Ash Pond at Midwest Generation, LLC’s (MWG) Waukegan Generating Station (“Station”) in Waukegan, Illinois. The East Ash Pond is a coal combustion residual (CCR) surface impoundment as defined in 40 CFR 257.53. MWG intends to close this CCR surface impoundment by leaving the impounded CCR in place and installing a final cover system over the impoundment in accordance with 40 CFR 257.102(d). Following completion of all closure activities, MWG will conduct post-closure care for the East Ash Pond in accordance with the requirements of 40 CFR 257.104(b) and in accordance with the post-closure care operating permit issued by the Illinois Environmental Protection Agency (EPA) for the East Ash Pond. This plan describes the post-closure care activities MWG anticipates performing throughout the post-closure life of the East Ash Pond.

2.0 POST-CLOSURE MONITORING & MAINTENANCE ACTIVITIES

Federal CCR Rule Reference: 40 CFR 257.104(d)(1)(i)

Post-closure monitoring for the East Ash Pond will include maintaining the integrity and effectiveness of the final cover system, maintaining the groundwater monitoring system, and monitoring the groundwater at the site. Table 1 summarizes the post-closure monitoring activities planned to meet these objectives and the corresponding frequencies at which these activities will be performed (at a minimum).

Table 1 – Planned Post-Closure Monitoring Activities

Monitoring Activity	Description	Monitoring Frequency	Action Items
Final Cover Monitoring	Visually inspect final cover for surface erosion.	Weekly, and following each 25-year, 24-hour storm event if the storm event occurs more than 48 hours before the next scheduled weekly inspection.	Revegetate bare areas as needed.
	Visually inspect final cover for settlement, subsidence, and vertical cracking.		Repair holes, depressions, <i>etc.</i> as needed to prevent standing water and infiltration into covered ash (<i>e.g.</i> , place fill and regrade).
Groundwater Monitoring	Monitor groundwater quality at the East Ash Pond site.	Quarterly for constituents and monthly for groundwater elevations, switching to semi-annually after five years of post-closure monitoring if approved by the Illinois EPA.	If necessary, implement corrective action remedies to achieve compliance with groundwater protection standards.

2.1 FINAL COVER SYSTEM MONITORING & MAINTENANCE

Federal CCR Rule Reference: 40 CFR 257.104(b)(1)

Throughout the post-closure care period, MWG will maintain integrity and effectiveness of the East Ash Pond's final cover system by regularly inspecting the cap for evidence of surface erosion, settlement, subsidence, or other events. If inspections reveal problems, appropriate corrective measures will be taken to remedy effects of surface erosion, settlement, subsidence, or other events.

2.2 GROUNDWATER MONITORING

Federal CCR Rule Reference: 40 CFR 257.104(b)(3)

MWG will maintain the East Ash Pond's groundwater monitoring system and will continue to monitor groundwater at the site throughout the post-closure care period in accordance with the 40 CFR 257.90 through 257.98. In accordance with the post-closure care operating permit issued by the Illinois EPA, groundwater monitoring will be performed quarterly for constituents and monthly for groundwater elevations. After five years of post-closure care, groundwater monitoring may be switched to a semi-annual basis if approved by the Illinois EPA.

3.0 FACILITY CONTACT DURING POST-CLOSURE CARE PERIOD

Federal CCR Rule Reference: 40 CFR 257.104(d)(1)(ii)

The name, address, telephone number, and e-mail address of the person to contact about the East Ash Pond during the post-closure care period are presented below:

Name: Paulo Rocha, Plant Manager
Address: Waukegan Generating Station
401 E. Greenwood Ave.
Waukegan, IL 60087
Telephone Number: (847) 599-2212
E-mail Address: paulo.rocha@nrg.com

4.0 PROPERTY USE DURING POST-CLOSURE CARE PERIOD

Federal CCR Rule Reference: 40 CFR 257.104(d)(1)(iii)

MWG intends for the East Ash Pond site to remain undisturbed during the post-closure care period. MWG plans to limit access to the site only for inspecting the condition of the final cover system, making repairs to the final cover system (as needed), and for accessing the groundwater monitoring wells (if necessary).

5.0 AMENDMENTS TO POST-CLOSURE PLAN

Federal CCR Rule Reference: 40 CFR 257.104(d)(3)

This post-closure plan will be amended in accordance with 40 CFR 257.104(d)(3) if a change in the operation of the East Ash Pond would substantially affect this post-closure plan or if an unanticipated event necessitates a revision to this post-closure plan. Any and all amendments to this post-closure plan will be certified by an independent, qualified professional engineer registered in the State of Illinois in accordance with 40 CFR 257.104(d)(4).

6.0 CERTIFICATION

Federal CCR Rule Reference: 40 CFR 257.104(d)(4)

I certify that this post-closure plan for the East Ash Pond meets the requirements for a written post-closure plan pursuant to 40 CFR 257.104(d).

I certify that this document was prepared by me or under my direct supervision and that I am a licensed professional engineer under the laws of the State of Illinois.

Certified By: Thomas Dehlin

Date: June 11, 2021

Seal:

