

Midwest Generation, LLC
Joliet Generating Station
1800 Channahon Road
Joliet, Illinois 60436

June 21, 2021

VIA EMAIL AND OVERNIGHT MAIL

Mr. Darin LeCrone, P.E.
Manager, Industrial Unit
Bureau of Water, Division of Water Pollution Control, Permits Section
Illinois Environmental Protection Agency
1021 North Grand Avenue, East
Springfield, IL 62702

Re: ***CONTAINS CONFIDENTIAL BUSINESS INFORMATION SUBJECT TO 2 I.A.C. 1828
AND 35 I.A.C. 130***

Cost Estimate for Closure and Post-Closure Care of the CCR surface impoundments and Proof of Financial Assurance at the Waukegan Generating Station

Dear Mr. LeCrone:

Pursuant to 35 I.A.C. 845.930(a), Midwest Generation, LLC (“MWG”) submits this written cost estimate for closure and post-closure care for CCR surface impoundments located at the Waukegan Generating Station. MWG is providing the “total cost for closure and post-closure care” under Part 845. 35 I.A.C. 845.930(b). These estimates are based upon current information and prices available to MWG as of June 21, 2021.

Taking into account the requirements of 35 I.A.C. 845.930(b)—including the use of “prevailing wages” (845.930(b)(3)); the exclusion of any zero costs for CCR that might have an economic value (845.930(b)(5)); and the exclusion of any salvage value of the facility, structures, or equipment (845.930(b)(4))—the following table gives the estimates for closure and post-closure care for the specific CCR surface impoundments at Waukegan Station. The requirements of Part 845 result in the cost estimate overstating the actual expected future costs.

Pond ID	Description	Closure Cost Estimate	Post Closure Care Cost Estimate
W0971900021-01	East Pond	\$1,995,814.20	\$2,118,000
W0971900021-02	West Pond	\$749,779.25	
Facility Total:		\$4,863,593.45	

The closure and post-closure estimates were derived based on the construction process and items detailed below.

A professional engineering firm will be retained to complete the CCR surface impoundments’ closure design and preparation of the construction bid documents. A contractor will be selected to complete the closure and final cover construction. Construction management (“CM”) and construction quality assurance (“CQA”) will be performed during CCR surface impoundments closure by qualified CM and CQA companies/engineering firms.

The individual CCR surface impoundments will be dewatered as necessary to facilitate closure by leaving the coal combustion residuals ("CCR") in place. Water removed from the CCR surface impoundments will be discharged through the NPDES-permitted outfall. Dewatering will be performed to the extent needed to allow CCR regrading activities to be completed to sufficiently stabilize the CCR and to provide a stable subgrade base for the final cover system.

The final cover system construction will be initiated upon the mobilization of the construction contractor to the CCR surface impoundments. The existing CCR surface impoundments and necessary surrounding areas will be cleared of vegetation and structures (removal or abandonment) to allow for the construction of the CCR subgrade.

In accordance with 40 C.F.R. Part 257 and the process in Part 845.750(c) that allows IEPA to approve an alternative cover, the final cover will include, at a minimum, material with a permeability less than or equal to the permeability of the natural subsoils present in the CCR surface impoundments or no greater than 1×10^{-7} cm/sec, whichever is less.

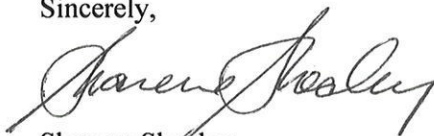
The final cover system will include necessary storm water management system components to promote positive drainage and to minimize erosion. Upon completion of the CCR surface impoundments closure construction, the contractor will demobilize from the project site.

Post-closure care for the CCR surface impoundments will be performed for the duration of the specified post-closure care timeframe. Groundwater monitoring will be performed at the required frequency, and the groundwater monitoring system will be inspected and maintained on a routine basis. Throughout the post-closure care period, periodic visual observations of the final cover system and stormwater management system will be performed.

Enclosed is proof of financial assurance for Waukegan Station's CCR surface impoundments.

If you have any questions regarding this submittal, please contact me at 724-255-3220 or sharene.shealey@nrg.com.

Sincerely,



Sharene Shealey
Director, Environment

Enclosures