

**PRELIMINARY CLOSURE PLAN  
POND 1N AND POND 1S  
WILL COUNTY STATION  
MARCH 2022**

This closure plan has been prepared in accordance with 35 Ill. Adm. Code 845.720(a) for Pond 1N and Pond 1S at the Will County Station, operated by Midwest Generation, LLC (Midwest Generation), in Romeoville, IL. Pond 1N and Pond 1S are inactive and were taken out of service around 2010. This closure plan describes the schedule and steps necessary for closure and methods for compliance with closure requirements for Pond 1N and Pond 1S.

**1.0 Closure Narrative  
[845.720(a)(1)(A)]**

The closure of Pond 1N and Pond 1S will be accomplished by leaving the coal combustion residual (CCR) in place and covering with a final cover system in accordance with 845.750. The closure will achieve the closure performance standards in accordance with 845.720(a).

**2.0 CCR Removal and Decontamination  
[845.720(a)(1)(B)]**

The closure of Pond 1N and Pond 1S will occur by leaving the CCR in place in accordance with 845.750.

**3.0 Closure with CCR Left in Place  
[845.720(a)(1)(C)]**

Pond 1N and Pond 1S will be closed by leaving the CCR in place in accordance with 845.750. As required, a final cover system (FCS) will be installed over the CCR in accordance with 845.750(c).

The closure will be implemented using the following methods and procedures:

1. The vegetation present will be removed as necessary to allow for CCR regrading;
2. The CCR in each pond will be regraded to a 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. Either one of the two following FCS's will be used for closure;

3. The FCS that will be installed over the regraded and compacted CCR will consist of either a geomembrane/soil cover system or the ClosureTurf cover system. The components for the geomembrane/soil cover system are as follows (from the bottom layer to the top layer):
  - An infiltration layer consisting of a geomembrane layer with a permeability no greater than  $1 \times 10^{-7}$  cm/sec;
  - Three (3) feet of imported clean material;
  - An erosion control layer consisting of six (6") inches of topsoil; and
  - Vegetation (mulch, fertilizer, and seed).

The components for the proprietary ClosureTurf cover system are as follows (from the bottom layer to the top layer):

- MicroDrain geomembrane liner;
- Engineered synthetic turf; and
- Sand infill within the synthetic turf.

#### **4.0 Maximum Inventory of CCR** **[845.720(a)(1)(D)]**

The maximum inventory of CCR ever on-site is based upon the estimated capacity of CCR in Pond 1N and Pond 1S. The estimated maximum inventory of CCR in Pond 1N is 19,259 cubic yards (CY) and the estimated maximum inventory in Pond 1S is 17,037 CY.

#### **5.0 Largest Area of CCR Requiring a Final Cover** **[845.720(a)(1)(E)]**

The FCS will cover a maximum area of approximately 2.13 acres for Pond 1N and 1.94 acres for Pond 1S.

#### **6.0 Closure Schedule** **[845.720(a)(1)(F)]**

Implementation of closure, as described, is estimated to require 30 months. Closure completion is estimated to occur by the end of 20XX. Closure design documents will be prepared to support applications for required local, state, and federal permits, construction-bidding specifications will be prepared, and contracting of the work for closure will be performed. Closure construction documents may include construction drawings for closure, technical specifications, and adequate CCR removal confirmation procedures. All necessary Federal, State, and Local permits required for closure construction will be evaluated and obtained, as necessary, at the time of closure, but are anticipated to include permits from the Illinois Environmental Protection Agency (IEPA). A preliminary schedule of anticipated closure activities and associated dates is included below.

### Closure Schedule

| Closure Activity  | Estimated Duration |
|---|--------------------|
| Prepare Closure Construction Design Documents                         | 7 Months           |
| Obtain Closure Construction Permit from Illinois EPA                  | 11 Months          |
| Hire Closure Contractor   | 4 Months           |
| Remove Existing Vegetation  | 1 Month            |
| Grade Existing CCR  | 1 Month            |
| Install Final Cover System  | 2 Months           |
| Submit Closure Report and Certification to Illinois EPA               | 1 Month            |
| Obtain Approval of Closure Report and Certification from Illinois EPA | 3 Months           |
| Certify Closures of Pond 1N and Pond 1S                               | --                 |

#### 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 §845.760(f), 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 §845.760(e)(2).

## 8.0 Closure Plan Amendments [845.720(a)(3)]

This Closure Plan will be amended in accordance with 845.720(a)(3). If a change in the operation of Pond 1N or Pond 1S would be 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 845.720(a)(4).

## 9.0 Professional Engineer's Certification [845.720(a)(4)]

This Closure Plan has been prepared to meet the requirements of 35 Ill. Adm. Code 845.720(a).



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Joshua D. Davenport, P.E.  
Illinois Professional Engineer

