

MWVG

Midwest Generation, LLC

Will County Generating Station

Post-Closure Care Plan for Pond 1N & Pond 1S

Revision 1

July 28, 2023

Issue Purpose: Use

Project No.: 12661-153

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TABLE OF CONTENTS

Table of Contentsi

1.0 Purpose1

2.0 Post-Closure Monitoring & Maintenance Activities1

 2.1 Final Cover System Monitoring & Maintenance2

 2.2 Groundwater Monitoring2

3.0 Facility Contact During Post-Closure Care Period3

4.0 Property Use During Post-Closure Care Period3

5.0 Amendments to Post-Closure Care Plan3

6.0 Certification4

7.0 References4

1.0 PURPOSE

Illinois CCR Rule Reference: 35 Ill. Adm. Code 845.780(d)

Pond 1N and Pond 1S at Midwest Generation, LLC's (MWG) Will County Generating Station ("Will County" or the "Station") are former ash ponds that were taken out of service in 2010. Both former ash ponds are regulated as inactive coal combustion residual (CCR) surface impoundments under the Illinois Pollution Control Board's "Standards for the Disposal of Coal Combustion Residuals in CCR Surface Impoundments," which are codified in Part 845 to Title 35 of the Illinois Administrative Code (35 Ill. Adm. Code 845, Ref. 1) and are also referred to herein as the "Illinois CCR Rule."

Pursuant to 35 Ill. Adm. Code 845.780(d), this document provides the written post-closure care plan for Ponds 1N and 1S at Will County. MWG intends to close these former ash ponds by leaving the impounded CCR in place and installing final cover systems over the impoundments in accordance with 35 Ill. Adm. Code 845.750. Following completion of all closure activities, MWG will conduct post-closure care for Ponds 1N and 1S in accordance with the requirements of 35 Ill. Adm. Code 845.780. This plan describes the post-closure care activities MWG anticipates performing throughout the post-closure care periods for Ponds 1N and 1S.

2.0 POST-CLOSURE MONITORING & MAINTENANCE ACTIVITIES

Illinois CCR Rule Reference: 35 Ill. Adm. Code 845.780(d)(1)(A)

Post-closure monitoring for Ponds 1N and 1S will include (1) maintaining the integrity and effectiveness of the final cover systems, (2) maintaining the groundwater monitoring system, and (3) 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 – Post-Closure Monitoring Frequency

| Monitoring Activity | Description | Monitoring Frequency | Corrective 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. | Replace synthetic turf infill as needed. |
| | Visually inspect final cover for settlement, subsidence, and vertical cracking. | | Repair holes, depressions, etc. as needed to prevent standing water and infiltration into covered ash. |
| | Visually inspect concrete overflow troughs for damage and signs of distress. | | Repair concrete as appropriate. |
| Groundwater Monitoring | Monitor groundwater quality at Ponds 1N and 1S. | 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

Illinois CCR Rule Reference: 35 Ill. Adm. Code 845.780(b)(1)

Throughout the post-closure care period, MWG will maintain the integrity and effectiveness of both final cover systems installed over Ponds 1N and 1S by regularly inspecting the caps for evidence of surface erosion, settlement, subsidence, or other events. These inspections will be performed by a qualified person in accordance with 35 Ill. Adm. Code 845.540(a) and will occur at least once a week and after each 25-year, 24-hour storm event if the latter occurs more than 48 hours before the next scheduled weekly inspection. If inspections reveal problems, appropriate corrective measures will be taken to remedy effects of surface erosion, settlement, subsidence, or other events.

In addition to monitoring the final cover systems for Ponds 1N and 1S for issues caused by large storm events and other potential on-site issues, MWG will visually inspect the western concrete overflow troughs for damage and signs of distress (e.g., cracking). If inspections reveal problems, appropriate corrective measures will be implemented.

2.2 GROUNDWATER MONITORING

Illinois CCR Rule Reference: 35 Ill. Adm. Code 845.780(b)(3)

MWG will maintain the groundwater monitoring system for Ponds 1N and 1S and will continue to monitor groundwater at the site throughout the post-closure care period in accordance with the requirements of 35 Ill.

Adm. Code Part 845 Subpart F (“Groundwater Monitoring and Corrective Action”). During the first five years of the pond’s post-closure care period, 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

Illinois CCR Rule Reference: 35 Ill. Adm. 845.780(d)(1)(B)

The name, address, telephone number, and e-mail address of the person to contact about Ponds 1N and 1S during the post-closure care period are presented below:

Name: Phillip Raush
Address: Will County Generating Station
529 East Romeo Road
Romeoville, IL 60441
Telephone Number: (815) 207-5412
E-mail Address: Phillip.Raush@nrg.com

4.0 PROPERTY USE DURING POST-CLOSURE CARE PERIOD

Illinois CCR Rule Reference: 35 Ill. Adm. Code 845.780(d)(1)(C)

As of the date of this plan, MWG intends for the sites of Ponds 1N and 1S to remain undisturbed during their post-closure care periods. MWG plans to limit access to the sites only for inspecting the conditions of the final cover systems, making repairs to the final cover systems (as needed), and for accessing the groundwater monitoring wells (as needed).

5.0 AMENDMENTS TO POST-CLOSURE CARE PLAN

Illinois CCR Rule Reference: 35 Ill. Adm. Code 845.780(d)(3)

This post-closure care plan will be amended in accordance with 35 Ill. Adm. Code 845.780(d)(3) if a change in the operation of Pond 1N or Pond 1S would substantially affect this plan or if an unanticipated event necessitates a revision to this plan.

6.0 CERTIFICATION

Illinois CCR Rule Reference: 35 Ill. Adm. Code 845.780(d)(4)

I certify that:

- This written post-closure care plan for Pond 1N and Pond 1S was prepared by me or under my direct supervision.
- The work was conducted in accordance with the requirements of 35 Ill. Adm. Code 845.780.
- I am a registered professional engineer under the laws of the State of Illinois.

Certified By: _____ Thomas J. Dehlin _____

Date: _____ July 28, 2023 _____

Seal:



7.0 REFERENCES

1. Illinois Pollution Control Board. "Standards for Disposal of Coal Combustion Residuals in CCR Surface Impoundments." 35 Ill. Adm. Code 845. Accessed April 12, 2023.