

# MWVG

Midwest Generation, LLC

Will County Generating Station

## Post-Closure Care Plan for South Ash Pond 2 & South Ash Pond 3

Revision 2

July 28, 2023

Issue Purpose: Use

Project No.: 12661-153

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## **1.0 PURPOSE & SCOPE**

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

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

### **1.1 PURPOSE**

South Ash Pond 2 and South Ash Pond 3 at Midwest Generation, LLC's (MWG) Will County Generating Station ("Will County" or the "Station") are existing coal combustion residual (CCR) surface impoundments that are regulated by the Illinois Pollution Control Board's "Standards for the Disposal of Coal Combustion Residuals in CCR Surface Impoundments." These regulations 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." South Ash Ponds 2 and 3 are also regulated by the U.S. Environmental Protection Agency's (EPA) "Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments," 40 CFR Part 257 Subpart D (Ref. 2), also referred to herein as the "Federal CCR Rule."

Pursuant to 35 Ill. Adm. Code 845.780(d) and 40 CFR 257.104(d), this document provides the written post-closure care plan for South Ash Pond 2 and 3 at Will County. MWG intends to close these CCR surface impoundments by leaving the impounded CCR in place and installing final cover systems over the impoundments in accordance with 35 Ill. Adm. Code 845.750 and 40 CFR 257.102(d). Following completion of all closure activities, MWG will conduct post-closure care for South Ash Pond 2 and 3 in accordance with the requirements of 35 Ill. Adm. Code 845.780 and 40 CFR 257.104(b). This plan describes the post-closure care activities MWG anticipates performing throughout the post-closure care periods for South Ash Pond 2 and 3.

### **1.2 SCOPE**

Per the 2016 Water Infrastructure Improvements for the Nation (WIIN) Act, South Ash Ponds 2 and 3 will continue to be subject to both the Illinois and Federal CCR Rules until the U.S. EPA approves the Illinois EPA's CCR permit program. The Illinois EPA has yet to publish a timeline for submitting its proposed CCR permit program to the U.S. EPA for approval, and so this written post-closure care plan has been prepared pursuant to both sets of regulations.

## 2.0 POST-CLOSURE MONITORING & MAINTENANCE ACTIVITIES

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

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

Post-closure monitoring for South Ash Ponds 2 and 3 will include (1) maintaining the integrity and effectiveness of the final cover system, (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 South Ash Ponds 2 and 3.	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)**

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

Throughout the post-closure care period, MWG will maintain the integrity and effectiveness of both final cover systems installed over South Ash Ponds 2 and 3 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 South Ash Ponds 2 and 3 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)**

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

MWG will maintain the groundwater monitoring system for South Ash Ponds 2 and 3 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”) and 40 CFR 257.90 through 40 CFR 257.98. 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)**

**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 South Ash Ponds 2 and 3 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](mailto: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)**

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

As of the date of this plan, MWG intends for the sites of South Ash Ponds 2 and 3 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)**

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

This post-closure care plan will be amended in accordance with 35 Ill. Adm. Code 845.780(d)(3) and 40 CFR 257.104(d)(3) if a change in the operation of South Ash Pond 2 or South Ash Pond 3 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)**

**Federal CCR Rule Reference: 40 CFR 257.102(d)(4)**

I certify that:

- This written post-closure care plan for South Ash Pond 2 and South Ash Pond 3 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 and with the requirements of 40 CFR 257.104.
- 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.
2. U.S. Environmental Protection Agency. "Standards for Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments." 40 CFR Part 257 Subpart D. <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-I/part-257/subpart-D>. Accessed April 12, 2023.