

Annual CCR Fugitive Dust Control Report
Will County Generating Station
529 East 135th Street/Romeoville, Illinois

1.0 Introduction

On December 19, 2014, the administrator of the U.S. Environmental Protection Agency signed the Disposal of Coal Combustion Residuals (CCR) from Electric Utilities final rule (the Rule). The Rule was published in the Federal Register on April 17, 2015 and became effective on October 19, 2015. The Rule establishes a comprehensive set of requirements for the disposal of CCR in landfills and surface impoundments at coal-fired power plants under Subtitle D of the Resource Conservation and Recovery Act. These requirements include compliance with location restrictions, design criteria, operating criteria, groundwater monitoring and corrective action, and closure and post-closure care aspects. The operating criteria include air criteria specified in Title 40 of the Code of Federal Regulations, §257.80, to address the potential pollution caused by windblown dust from CCR units.

The Will County Generating Station, operated by Midwest Generation, LLC (MWG), is located at 529 East 135th Street, Romeoville, Will County, Illinois. The facility is a coal-fired electric power generating station currently occupying approximately 200 acres. There is currently one coal-fired operating unit, Unit 4. Electrical power is transmitted from the site to the area grid through overhead transmission power lines. The Rule applies to this facility due to the disposal management of CCR that is generated from the combustion of coal. CCR units associated with the station include the South Ash Pond 2 and South Ash Pond 3.

According to the Rule, owners or operators of CCR units must adopt measures that will effectively minimize CCR from becoming airborne at the facility by developing and operating in accordance with a Fugitive Dust Control Plan (Plan) with adequate dust control measures. In this regard, a Plan was prepared to comply with the requirements as specified in §257.80(b)(1-7) of the Rule and placed in the Will County facility's operating record on October 19, 2015 per §257.105(g)(1). As required, the Plan was also noticed to the State Director per §257.106(g)(1) and posted to the publicly accessible internet site per §257.107(g)(1).

In addition to the above and per §257.80(c), an Annual Fugitive Dust Control Report (Annual Report) must be completed that includes the following:

- Description of actions taken to control CCR fugitive dust
- Record of all citizen complaints
- Summary of any corrective actions taken

The Annual Report must be completed no later than one year after completion and placement of the previous Report in the facility's operating record. This document represents the 2018 Annual

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Report for Will County and will also be appropriately placed in the facility's operating record per §257.105(g)(2), noticed to the State Director per §257.106(g)(2), and posted to the publicly accessible internet site per §257.107(g)(2).

2.0 Actions Taken to Control CCR Fugitive Dust

As detailed in the Plan and reiterated below, the station has established procedures and inspection requirements which are implemented to minimize/eliminate airborne emissions from the potential fugitive dust sources. The results from inspections conducted and associated observations made during CCR handling activities are documented on logs maintained in the station's Environmental Department, including those specific to the one-year period (November 2017 to November 2018) relevant to this Annual Report.

2.1 Bottom Ash and Slag Distribution System

Bottom ash and slag is in a liquid mixture within a closed system until the point of discharge at Ash Pond 2 South or Ash Pond 3 South. A significant portion of the piping system is contained within a building, which eliminates dust emissions to the outside environment. An assessment of the exterior distribution system is performed on a quarterly basis to verify the integrity of the system or when a breach in the system is detected. If a leak is noted, resulting in the release of bottom ash and slag, the affected area will be restored to original conditions and repair of the pipe will be performed as soon as feasible. The ash will be sent offsite to a licensed landfill.

2.2 Ash Pond 2 South and Ash Pond 3 South

During normal operations, the Ash Ponds are filled with water thereby suppressing any potential fugitive dust emissions. Infrequently, the ponds will need to be dewatered and the sediment removed off site to a licensed landfill. While the bottom ash and slag residue is drying, there is the potential for this material to become airborne especially during excessively dry and windy conditions. Loading of this material under these conditions also has the potential for generating fugitive dust. Dewatered ponds are assessed on a quarterly basis or more frequently during excessively dry and windy conditions. To minimize fugitive dust emissions from exposed dry bottom ash and slag, the height of the staged material is minimized and the material piles are either sprayed with water or covered. Loading activities also are limited during such occasions. Haul trucks are covered with tarps once they have been loaded.

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2.3 *Fly Ash Handling Equipment*

Fly ash from the mechanical separators is sent to the silos within enclosed piping. At the silos, the fly ash is drop loaded into a tank truck through a telescopic, baghouse-controlled drop chute. This loading mechanism minimizes the potential for fly ash to become airborne during the loading process. The loading of trucks also occurs within a partial enclosure. At the completion of loading, the truck moves a short distance to an elevated truck stand where it is broom swept to remove any accumulated fly ash. Accumulated ash is promptly transferred to the fly ash concrete storage pad.

This process is covered by the facility's fugitive dust operating program. Under the program, the facility must maintain control measures, including enclosures, covers and dust collection devices. Additionally, the facility conducts weekly inspections of the process to confirm compliance. A record of the inspections is maintained at the facility.

2.4 *Concrete Storage Pad*

The concrete pad only periodically contains bottom ash and slag, fly ash and other ash-related materials generated from routine maintenance activities. Typically these materials are in a wet state but are allowed to partially dry to facilitate removal. When sufficiently dry, the material is promptly removed to an off-site licensed landfill. The concrete pad is assessed on a quarterly basis or more frequently during excessively dry and windy conditions. To minimize fugitive dust emissions from exposed dry bottom ash and slag, fly ash, and other ash related materials, the height of the staged material is minimized and the material piles are either sprayed with water or covered.

2.5 *Ash Transport Roadways*

Truck drivers are instructed on the proper procedure for cleaning trucks and a vehicle speed limit is enforced at the facility. Ash material that may not have been adequately removed from the trucks has the potential to become airborne and ultimately be deposited on haul roads. To minimize fugitive dust emissions, these roads are assessed on a quarterly basis and any observed accumulated ash material is promptly cleaned up and collected for off-site removal to a licensed landfill.

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3.0 Fugitive CCR Dust Assessments

Pursuant to 40 CFR 257.80(b)(4), assessments of the potential fugitive dust emission sources identified in the Will County facility's CCR Fugitive Dust Control Plan (Plan) are conducted to assess the effectiveness of the Plan. The assessment includes observation of ash removal from ponds, temporary storage and transport activities at the facility to confirm the adequacy of the control measures. The assessments are conducted on a quarterly basis by an individual designated by the contact identified below. Observations made during each assessment are recorded on a form similar to the one included in Appendix B of the Will County facility's CCR Fugitive Dust Control Plan.

If the results of the assessment determine that ash-related equipment has malfunctioned or the integrity of the equipment has been compromised, the necessary repairs or replacement are performed as soon as feasible. If the assessment finds that the Plan does not effectively minimize the CCR from becoming airborne, the Plan is amended to include additional control measures. No issues were identified during this Annual Report's period of record covering November 2017 through November 2018.

Owner Representative/Responsible Person Contact Information:

Mr. William Naglosky
Station Manager
815-207-5412

4.0 Record of Citizen Complaints

Per the Rule, the Annual Report must include a record of all citizen complaints that were received by the Will County station with regard to fugitive dust emission incidents. In line with established protocols and within 24 hours of receipt, the station's environmental coordinator enters the citizen complaint into MWG's Environmental Management Information System (EMIS) database. The EMIS database then automatically forwards notice of the complaint to the station manager, MWG's regional environmental manager, and MWG's corporate environmental department. Following initial evaluation of the complaint, NRG then conducts a thorough investigation to confirm the reported incident/conditions and implement corrective actions as may be warranted.

No complaints were registered during this Annual Report's period of record covering November 2017 through November 2018.

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5.0 Summary of Corrective Actions Taken

For the November 2017 to November 2018 period of record, and based on continued monitoring and inspections as outlined in Section 2.0 and 3.0 and as required under the CCR rules, the currently established control measures remain effective in minimizing potential fugitive dust emissions. Moreover, this assertion is further validated by the lack of citizen complaints logged over this same period. Accordingly, no corrective actions were undertaken during the past year, either as a result of internally identified deficiencies or from resolution of citizen complaints.