CCR COMPLIANCE
FUGITIVE DUST CONTROL PLAN

Midwest Generation, LLC
Will County Generating Station
529 East 135th Street
Romeoville, Illinois

PREPARED BY: KPRG and Associates, Inc.
14665 W. Lisbon Road, Suite 1A
Brookfield, Wisconsin 53005

August 18, 2023

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1.0 INTRODUCTION

On April 17, 2015, the United States Environmental Protection Agency published a final rule regulating coal combustion residuals (CCR) as part of 40 CFR 257 (the Federal CCR Rule). On April 15, 2021, the Illinois Environmental Protection Agency adopted a 35 Ill. Adm. Code 845 (the Illinois CCR Rule) creating statewide standards for the disposal of CCR in surface impoundments, created by the generation of electricity by coal-fired power plants. Part. Both 40 CFR 257 and 35 Ill. Adm. Code specifically require that "the owner or operator of a CCR landfill, CCR surface impoundment, or any lateral expansion of a CCR unit (surface impoundment), must adopt measures that will effectively minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units (surface impoundments),, roads, and other CCR management and material handling activities". As a result, each regulated facility must develop a CCR fugitive dust control plan that complies with 40 CFR 257.80 and 35 Ill. Adm. Code 845.500(b). It should be noted that 40 CFR Part 257 also regulates CCR landfills but 35 Ill. Adm. Code only regulates CCR surface impoundments.

This site specific Fugitive Dust Control Plan (Plan) has been developed to comply with the requirements specified in both 40 CFR 257.80 and 35 Ill. Adm. Code 845.500. In general, the Plan identifies the potential CCR fugitive dust sources and describes the control measures that will be implemented to minimize CCR fugitive dust emissions. The Plan also includes a procedure for the periodic assessment of the Plan's effectiveness, documentation of any Plan amendments deemed necessary to assure continued compliance, a record of any citizen complaints received pertaining to CCR fugitive dust emissions, and an outline of the required reporting and recordkeeping requirements in both regulations.

This Plan has been revised to combine the requirements for the Federal CCR Rule and Illinois CCR Rule into one plan and reflect the current conditions at the facility.

2.0 SITE INFORMATION

2.1 Owner/Operator and Address:

Midwest Generation, LLC
Will County Generating Station
529 East 135th Street
Romeoville, Illinois

2.2 Owner Representative/Responsible Person Contact Information:

Plant Engineer
815-315-2825

2.3 Location and Description of Facility Operations

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 retired coal-fired electric power generating station that occupies approximately 200 acres. The last remaining coal-fired unit at the Station, Unit 4, ceased operation in June 2022. Electrical power was transmitted from the site to the area grid through overhead transmission power lines.

The general vicinity primarily includes industrial facilities, residential development, agricultural areas, and parklands.

3.0 POTENTIAL FUGITIVE DUST SOURCES

Potential fugitive dust sources associated with the bottom ash ponds, temporary ash storage locations, and ash truck transportation routes have been identified at the facility. With the retirement of Unit 4 potential CCR fugitive dust sources associated with coal combustion operations, including exterior ash distribution systems and ash bulk loading/unloading operations are no longer occurring. Fugitive dust could potentially be generated from these sources as a result of wind erosion, housekeeping issues and/or the nature of the operation. Specifically, these identified sources were further evaluated to determine the probability of CCR fugitive dust being generated and to determine the level of emission controls that are warranted to mitigate fugitive dust emissions. The findings of the evaluation are individually discussed in the following sections.

3.1 Ash Pond 2S and Ash Pond 3S

Ash Pond 2S and Ash Pond 3S were previously filled with water when they were operational and remain filled with water despite being out of service. If either pond needs to be dewatered and the sediment removed off site to a licensed landfill, 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. The ponds are assessed on a quarterly basis or more frequently during excessively dry and windy conditions. As needed, such as during closure, to minimize fugitive dust emissions from exposed dry bottom ash and slag, the height of the staged material will be minimized and the material piles either sprayed with water or covered. Loading activities will also be limited during such occasions. Haul trucks will be covered with tarps once they have been loaded.

3.2 Ash Pond 1N and Ash Pond 1S

Ash Pond 1N and Ash Pond 1S are inactive surface impoundments and no longer receive bottom ash or slag. The bottom ash/slag material remains within each pond. Standing water is not present and excessive precipitation that enters each pond will drain out of the pond into the outlet trough. The bottom ash/slag is substantially vegetated with minimal amounts of ash exposed. Some ash does have the potential to become airborne especially during excessively dry and windy conditions.

3.3 Concrete Storage Pad

A grade-level concrete pad within a retaining wall having a windscreen is infrequently used for the temporary storage of residual bottom ash and slag and fly ash generated as a result of routine ash-related decommissioning activities. The staged material is allowed to partially dry within the structure until it is suitable for off-site removal. The material is loaded into open top trucks, covered and sent off site to a licensed landfill. Dry material that is exposed during excessive windy and dry weather conditions has the potential for becoming fugitive dust emissions.

3.4 Ash Transport Roadways

Both gravel covered and asphalt paved roads within the facility are used by trucks when hauling bottom ash and slag and fly ash to an off-site licensed landfill as well as by other vehicles entering and exiting the facility. Fugitive CCR dust emissions could occur during transit if ash material is not properly cleaned from the trucks or if there is a release of ash material from the vehicle due to a malfunction or accident.

These potential fugitive dust sources are identified on the Site Diagram included in Appendix A.

4.0 DESCRIPTION OF CONTROL MEASURES

4.1 Purpose

The purpose of developing appropriate control measures is to minimize and reduce the emissions of CCR fugitive dust from the identified potential emission sources. The control measures and work practices implemented at the facility are described in the following sections.

4.2 Ash Pond 2S and Ash Pond 3S

South Ash Pond 2 and South Ash Pond 3 were previously filled with water when they were operational and remain filled with water despite being out of service. If either pond needs to be dewatered and the sediment removed off site to a licensed landfill, 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. As needed, such as during closure, to minimize fugitive dust emissions from exposed dry bottom ash and slag, the height of the staged material will be minimized and the material piles either sprayed with water or covered. Loading activities will also be limited during such occasions. Haul trucks will be covered with tarps once they have been loaded.

4.3 Ash Pond 1N and Ash Pond 1S

Ash Pond 1N and Ash Pond 1S are inactive surface impoundments and no longer receive bottom ash or slag. The bottom ash/slag material remains within each pond. Precipitation that falls on the bottom ash/slag prevents it from drying out and becoming airborne. Standing water is not present and excessive precipitation that enters each pond will drain out of the pond into the outlet trough. The bottom ash/slag is substantially vegetated with minimal amounts of ash exposed. Some ash does have the potential to become airborne especially during excessively dry and windy conditions. Each pond will be assessed at least quarterly or more frequent during excessively dry and windy conditions. To minimize fugitive dust emissions from exposed dry bottom ash and slag, the material will be sprayed with water, as needed.

4.4 Concrete Storage Pad

The concrete pad only periodically contains bottom ash and slag, fly ash and other ash-related materials generated from routine decommissioning 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 will be 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 will be minimized and the material piles will be either sprayed with water or covered. With the retirement of Unit 4 and decommissioning of the facility ongoing, the concrete storage pad will be used infrequently, if at all.

4.5 Ash Transport Roadways

During CCR hauling activities, 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 will be assessed on a quarterly basis and any observed accumulated ash material will be promptly cleaned up and collected for off-site removal to a licensed landfill.

5.0 PLAN ASSESSMENTS/AMENDMENTS

To assure that the work practices being implemented adequately control the dust from the identified potential fugitive dust emission sources at the facility, routine assessments and record keeping are performed. These procedures include the following:

5.1 Fugitive CCR Dust Assessments

Pursuant to 257.80(b)(4) and 845.500(b)(3), assessments of the potential CCR fugitive dust emission sources identified within this Plan will be conducted to assess the effectiveness of this Plan. The assessment will include observation of ash removal from ponds, temporary storage and transport activities at the facility to confirm the adequacy of the control measures. The assessments will be conducted on a quarterly basis by an individual designated by the contact identified in Section 2.2 of this Plan. Observations made during each assessment will be recorded on a form similar to the one included in Appendix B; however, the station may create their own form.

If the assessment finds that this Plan does not effectively minimize the CCR from becoming airborne, this Plan will be amended to include additional control measures.

5.2 Plan Amendments

This Fugitive Dust Plan will be reviewed whenever there is a change in conditions that would substantially affect the written Plan currently in place. A record of the reviews and any modifications or amendments made to the Plan currently in place will be kept on a form similar to the one included in Appendix C; however, the station may create their own form. The amended Plan will be reviewed by a Registered Professional Engineer and, if deemed acceptable, will be recertified.

5.3 Citizen Complaints

Any written or verbal complaints received from a citizen involving alleged CCR fugitive dust emission events at the facility will be recorded by an individual designated by the contact identified in Section 2.2 of this Plan. The complaints will be recorded on a form similar to the one included in Appendix D; however, the station may create their own form. Upon receipt of the complaint, an investigation of the alleged source of the fugitive dust emissions will be performed and the results of that investigation recorded on the form. If the fugitive dust emission event is confirmed, any necessary repairs or changes in operation required to mitigate the fugitive dust emissions will be implemented as soon as practicable.

6.0 FUGITIVE DUST PLAN REPORTING/RECORDKEEPING REQUIREMENTS

This section outlines the Plan reports that must be prepared and records that must be maintained to meet the requirements specified in the Federal and Illinois CCR Rules. These requirements include the following:

- Place the Plan in the facility's operating record and publicly accessible internet site. If the Plan is amended, replace the initial Plan with the amended Plan. Only the most recent amended Plan will be maintained in the facility's operating record and internet site.

- Prepare an annual CCR Fugitive Dust Control Report compliant with 40 CFR 257.80(c) and place it in the facility's operating record and post to the publicly accessible internet site. The annual report will include:
  - A description of the actions taken to control CCR fugitive dust,
  - A record of all citizen complaints, and
  - A summary of any corrective measures taken.

- Prepare an annual CCR Fugitive Dust Control Report compliant with 35 Ill. Adm. Code 845.500(c), place it in the facility's operating record and submit to the IEPA as part of the annual consolidated report required by 845.550. The annual report will be posted to the publicly accessible website and will include:
  - A description of the actions taken to control CCR fugitive dust,
  - A record of all citizen complaints, and
  - A summary of any corrective measures taken.

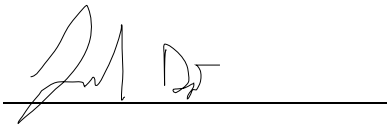
- Provide notification to the IEPA and, if applicable, the Tribal authority when the Plan and reports are placed in the facility's operating record and publicly accessible internet site.

- Submit quarterly reports compliant with 35 Ill. Adm. Code 845.500(b)(2)(B) to IEPA within 14 days from the end of the quarter of all complaints received in that quarter. The quarterly reports will include:
  - The date of the complaint,
  - The date of the incident,
  - The name and contact information of the complainant, and
  - All actions taken to assess and resolve the complaint.

7.0 PROFESSIONAL ENGINEER CERTIFICATION

The undersigned Registered Professional Engineer is familiar with the requirements of 40 CFR 257.80 and 35 Ill. Adm. Code 845.500 and has visited and examined the facility or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this CCR Fugitive Dust Control Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and meets the requirements of 40 CFR 257.80 and 35 Ill. Adm. Code 845.500, and that this Plan is adequate for the facility. This certification was prepared as required by 40 CFR 257.80(b)(7) and 35 Ill. Adm. Code 845.500(b)(7).

Engineer: Joshua D. Davenport

Signature: 

Date: 8/18/2023

Company: KPRG and Associates, Inc.

Registration State: Illinois

Registration Number: 062.061945

License Expiration Date: November 30, 2023

Professional Engineer Stamp: 

APPENDIX A

SITE DIAGRAM
POTENTIAL FUGITIVE DUST SOURCES

ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG

KPRG and Associates, inc.

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

14665 West Lisbon Road, Suite 1A Brookfield, Wisconsin 53005 Telephone 262-781-0475 Facsimile 262-781-0478

SITE DIAGRAM/FUGITIVE DUST SOURCES

WILL COUNTY GENERATING STATION
ROMEOVILLE, ILLINOIS

Scale: 1" = 500'	Date: August 17, 2023
KPRG Project No. 15315	APPENDIX A

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APPENDIX B

EXAMPLE ASSESSMENT RECORD

APPENDIX B

WILL COUNTY STATION

ASSESSMENT RECORD

Date	Inspector	Unit Inspected (See Key Below)	Maintenance/Cleanup Required (yes/no)	Response Action Performed (completion date)	Inspector Signature

Unit Key:
1 - Ash Ponds 1N/1S/2S/3S
2 - Concrete Storage Pad
3 - Ash Roadways

APPENDIX C

EXAMPLE PLAN REVIEW AND AMENDMENT RECORD

APPENDIX C

WILL COUNTY STATION

CCR PLAN REVIEW/AMENDMENT RECORD

Date of Review	Reason for Review	Section Amended	P.E. Certification (Name/Date)
August 2023	Combine federal & IL state plans	Sections 1.0 through 7.0	Josh Davenport, 08/2023

APPENDIX D

EXAMPLE CITIZEN COMPLAINT LOG

APPENDIX D

WILL COUNTY STATION

EXAMPLE CITIZEN COMPLAINT LOG

Date	Time	Citizen Information (Name, Address, Phone No., Email)	Summary of Complaint	Action Taken	Recorded By