



ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

INSPECTION SUMMARY LETTER

August 27, 2009

Ms. Elsie Briette
Midwest Generation, LLC
1800 Channahon Road
Joliet, IL 60436

VIA E-MAIL and U.S. MAIL

KPRG Project No. 15209

Re: Joliet #29 Former Ash Burial Area Runoff Inspection 2009

Dear Ms. Briette:

KPRG and Associates, Inc. (KPRG) completed a walk-over inspection of the former ash burial area on the northeast side of the Joliet #29 property, outside the fenced boundary of the facility. The inspection was performed on August 24th and 25th, 2009. The purpose of the inspection was to identify any erosional features that may expose the underlying buried ash/slag and channel runoff toward the Des Plaines River which is immediately south of this area. It is noted that the ash burial area also extends to the west to within the fenced portion of the Joliet #29 facility. This portion of the former ash burial area was inspected by Midwest Generation and KPRG on July 14, 2009. It is our understanding that the ash burial area is included within the storm water/discharge permit for the facility and this inspection is part of permit compliance requirements.

During the inspection, KPRG identified five areas outside the fenced boundary of the Joliet #29 facility where either sheet wash erosion or rilling has exposed the underlying ash/slag and may transport the material to the Des Plaines River. These are identified as Areas 1 through 5 below. In addition, there was one erosional area identified within the fenced boundary of the Joliet #29 facility. This is identified as Area 6 below.

For each of the six areas, the following observations and recommendations for repair are forwarded:

- Area 1 – Located at coordinates N41° 30.068'/W88° 06.419'. This is an area of sheet wash which has eroded some of the gravel/rock cover and has started to expose some underlying ash/slag. The area of ash exposure is about 30 feet wide and extends from the top of the slope to the river water interface.

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CAMD Ev. 748 N

The recommended repair should include prepping/grading an approximate 50' x 50' surface area (this will include the subject area and a sufficient buffer around the area) and properly placing 4" to 6" of clayey top soil. The top soil should be seeded with a mix of all purpose seed and annual rye. The annual rye will accommodate germination in the later summer and fall months. This should then be covered with a green wood fiber erosion blanket. A series of straw logs should be placed along the top of the subject area to help reduce sheet runoff erosional effects.

- Area 2 – Located at N41° 29.950/W88° 06.621'. This is an area of a deeply incised, sinuous gully that breaches the existing earthen/rock berm. It is located within a heavily vegetated area. The gully is approximately 50 feet long, up to 4 feet deep and 10 feet wide. There is evidence of ash/slag in the bottom of the gully.

The recommended repair is to construct a 3 to 4 foot clay berm topped with rip rap to mend the breach in the existing berm. The remainder of the gully will be dressed with clayey top soil and seeded with a mix of all purpose seed and annual rye. The gully will also be grubbed out to allow for sufficient sunlight penetration to accommodate seed germination.

- Area 3 – Located at N41° 29.916'/W88° 06.683'. This is an area at the top of the bank which has ash/slag exposed to sheet runoff. The area is approximately 30' x 30' in size. The side slope of bank itself appears in good condition.

The recommended repair is to clear the area, place 4" to 6" of top soil and seed with a mix of all purpose seed and annual rye. Cover the area with hay to preclude erosion during germination.

- Area 4 – Located at N41° 29.894'/W88° 06.732'. This area has a small rill that has started to form with some evidence of ash and slag toward the bottom. The rill is about 15 feet long, 2 feet deep and 3 to 4 feet wide. The remainder of the bank side slope appears in good condition.

The recommended repair is to fill in the rill with clayey top soil and seed with a mix of all purpose seed and annual rye. This should then be covered with an erosion mat. A straw log should be placed along the top of the subject area to help reduce runoff erosional effects.

- Area 5 – Located at N41° 29.889/W88° 06.947'. This is an area of sheet wash which has eroded most of the cover and has exposed ash/slag along the side of the bank. The area of ash exposure is about 50 feet wide and extends from the top of the slope to the river water interface. The slope is fairly steep at this location.

The recommended repair is to grade the area, place clayey top soil and seed with a mix of all purpose seed and annual rye. Due to the steepness of the slope, the area should then be covered with a properly anchored Eastcoast Erosion Blanket ECC-3 which is a specialty three-layer netting structure that firmly helps secure and promote vegetal growth along slopes. The matting configuration includes a layer of 100% coconut matrix material. The underlying seed will germinate and grow directly through the blanket. The length of the blanket should extend to beyond the area of exposure. The top of the blanket will be additionally anchored into a small excavated trench to preclude underwashing. The top of the area should then be lined with rip-rap to help disperse and reduce sheet runoff effects.

- Area 6 is located within the fenced boundary of the Joliet #29 facility, approximately 500 feet west of Area 5. As noted above, this area was inspected during a site meeting with Midwest Generation on July 14, 2009. Similar to Area 5, this is an area of sheet wash which has eroded most of the cover and has exposed ash/slag along the side of the bank. The area of ash exposure is about 50 feet wide and extends from the top of the slope to the river water interface. The slope is fairly steep at this location.

The recommended repair is the same as provided for Area 5 above.

KPRG met with Allied Landscaping at the site to show the areas of required repair to facilitate a contractor cost estimate. Upon receipt of Allied's estimate, KPRG will follow-up with a separate cost estimate for implementation of the recommended repairs. The cost for each area will be itemized out in the estimate.

KPRG appreciates the continued opportunity for providing our technical services to Midwest Generation. If there are any questions, please contact me at 262-781-0475.

Sincerely,
KPRG and Associates, Inc.



Richard R. Gnat, P.G.
Principal