

ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

INSPECTION SUMMARY LETTER and REPAIR COST ESTIMATE

September 19, 2012

Mr. James DiCola
Midwest Generation, LLC
1800 Channahon Road
Joliet, IL 60436

VIA E-MAIL and U.S. MAIL

KPRG Project No. 15209.5

Re: Joliet #29 Former Ash Burial Area Runoff Inspection 2012

Dear Mr. DiCola:

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, both inside and outside the fenced boundary of the facility. The inspection was performed on September 12, 2012. 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 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 four areas where either sheet wash erosion or rilling has exposed, or may expose, the underlying ash/slag and resulting in potential transport of material to the Des Plaines River. These are identified as Areas 1 through 4 below and pictures are attached (it is noted that the pictures of Areas 2 and 3 have been inadvertently erased and are therefore not included. Pre-repair photos will be taken of these areas to re-document the current conditions). For each of the areas, the following observations and recommendations for repair are forwarded:

- Area 1 – Located at coordinates N41° 29.846'/W88° 07.021'. This is a flat area at the top of the embankment where the vegetal cover has been eroded and ash exposed. This area is approximately 450 square feet in size.

The recommended repair is to cover the area with topsoil and seed with a mix of all purpose seed and annual rye. This should then be covered with an erosion mat/blanket.

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CMPD. Ex. 251N

- Area 2 – Located at N41° 29.883'/W88° 06.954'. At this location, a storm event uprooted a small tree at the base of the slope/water interface of the intake channel. The toppled tree has resulted in an escarpment. Although no visible ash is exposed, the presence of the escarpment will facilitate continued erosion into the toe of the embankment.

The recommended repair is to remove the fallen tree (will require an excavator or backhoe to reach down over the bank), place and anchor (top and sides) a geo-grid over the exposed soil of the escarpment, place rip-rap on top of the geo-grid to protect against continued erosion. Any exposed area above the rip-rap will be seeded and an erosion mat/blanket will be placed on top. A sediment log will also be placed above the area for additional short-term protection against sheet runoff as the seed germinates.

- Area 3 – Located at N41° 29.884'/W88° 06.932'. This is an area where there is a small incision into the top of the bank. The incised feature is approximately 25 feet long, 15 feet wide and up to 1 foot deep.

The recommended repair is to fill in the incised area with clayey top soil and seed with a mix of all purpose seed and annual rye. This should then be covered with a green wood fiber erosion blanket, or equivalent. A straw log should be placed along the top of the subject area to help reduce sheet runoff erosional effects.

- Area 4 – Located at N41° 29.886'/W88° 06.854'. This is an upland area of rill development which eventually turns into sheet runoff as the ground flattens prior to flowing toward the channel bank. The rill is approximately 75 feet long, 3 feet wide and up to 1.5 feet deep.

The recommended repair should include filling in the rill with clayey top soil, mechanical compaction and seed with a mix of all purpose seed and annual rye. This should then be covered with a green wood fiber erosion blanket. A straw sediment log should be placed along the top of the subject area to help reduce sheet runoff erosional effects.

All other areas along the cover that have undergone repair over the last four years appear in good condition with no additional detrimental erosion effects being displayed at this time.

Allied Landscaping was requested to provide a cost for repair of the above noted items. Based on their estimate, KPRG can implement the above recommended repairs for a Lump Sum cost of \$9,130. A breakdown of the Lump Sum cost is as follows:

<u>ITEM</u>	<u>COST</u>
KPRG Field/Management Labor	\$ 1,835
Expenses	\$ 200

KPRG and Associates, Inc.

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Allied Landscaping	\$ 6,845
Documentation Report	<u>\$ 250</u>
Total Lump Sum	\$ 9,130

The cost estimate is based on the following assumptions:

- Allied Landscaping will be contracted by KPRG to perform this work under the direction and supervision of a KPRG engineer/geologist.
- A summary letter report with photodocumentation.

Upon approval, the work can be scheduled for the first part of next week and should take no more than 1.5 days to complete. A full repair documentation report will be provided by no later than Friday September 28, 2012.

All work will be performed in accordance with the contract terms and conditions currently in place between KPRG and Midwest Generation. 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.



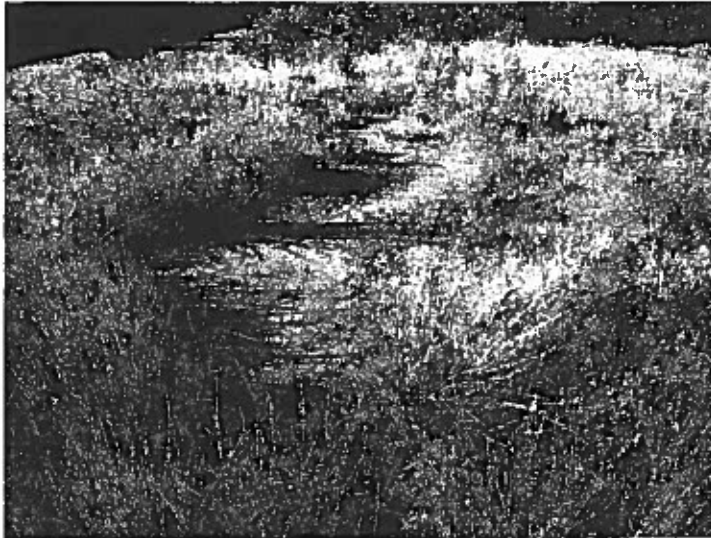
Richard R. Gnat, P.G.
Principal

Attachment

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Photo documentation - Juliet #29, Ash cover inspection - September 2012



Area 1. Exposed ash at top of bank.



Area 4. Upland rill.

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