



December 11, 2008

Illinois Environmental Protection Agency  
Office of Emergency Response  
1021 North Grand Avenue East  
PO Box 19276, Mail Drop #29  
Springfield, IL 62794-9276

CERTIFIED MAIL

**SUBJECT:** NPDES Permit No. IL0002208

IEMA Incident 20081424, Romeoville, Will County

To Whom It May Concern:

We are providing this follow-up report regarding an unpermitted discharge event that occurred at Will County Generating Station on November 3, 2008. This event did not constitute a noncompliance activity which in any way endangered public health or the environment.

Illinois Emergency Management Agency was notified by telephone on November 4, 2008 and an Incident Number of 20081404 was assigned to the event. Below is a description of the incident and the corrective actions taken by the Will County Station.

On November 3, 2008, at approximately 4:00 pm, a Midwest Generation employee notified operations management that there was water flowing over the concrete barrier of the Unit 1 & 2 ash pond and traveling into a ravine that leads to the Des Plaines River. The water flowed down a ravine on the northwest area of our property. This ravine leads to a small tributary of the Des Plaines River. Upon discovery of the flowing water, the discharge to the pond was immediately stopped and a temporary berm was erected in two areas where water was seen flowing downwards into the ravine. This berm stopped the flow of water from entering the ravine. The water was largely contained to the Station's property. We cannot estimate the amount of ash sluice water that left the property as a result of the incident. Midwest Generation immediately took measures to ensure that the water flow was stopped by erecting a temporary berm at the fence and stopping the flow of water into the ash pond.

The Unit 1 & 2 ash pond contains ash sluice water from Units 1 and 2. This water would normally go through settling, treatment and then be recycled or released through a permitted outfall (002 Recycle Wastewater Treatment System Blowdown). Typically, slag is pulled from this pond by a contractor and beneficially used outside of plant. After the contractor removes the slag from the pond, the contractor will vertically pile a reinforcement of slag on top of the concrete barrier on the north side of the pond. This

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reinforcement is used as a simple means of increasing the height of the containment wall to provide additional protection from water flowing outside the containment. However, in this instance, the contractor did not build the reinforcement after the slag was pulled from the pond and water flowed over the barrier.

To prevent potential unpermitted discharges from this area, permanent berming has been installed in front of the fence on the northwest area of the property to prohibit water from flowing down into the tributary. The roadway on the northwest area of the property has also been re-graded and improved. Updates to equipment operator checklists have been made to include more thorough checks of the pond and water flow within the pond. These checklists are then reviewed on a daily basis by the shift supervisor. The fuel handling shift supervisor also performs a visual inspection of the pond once per day and documents the inspection results in the fuel handling log. The pond is thus being inspected two times per day by two separate employees. Retraining of our contractor who cleans our ponds has also occurred. This training ensured that our contractor has a clear understanding of the expectations of the acceptable operational level of the pond.

If you require additional details or have any questions in regards to this matter do not hesitate to contact me at 815-372-4512 or Rebecca Maddox at 815-372-4589.

Sincerely,

Donald Claybaugh

Director, Will County Generating Station

cc: Riccardo Ng, IEPA Des Plaines Office  
IEPA - Emergency Operations Unit, Springfield Office  
IEPA - Bureau of Water, Springfield Office  
Maria Race - Midwest Generation Corporate Office  
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