

WATER - MS

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ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

TRANSMITTAL LETTER

September 11, 2013

Mr. Lynn Dunaway  
Illinois Environmental Protection Agency  
Bureau of Water, PWS#13  
1021 North Grand Avenue East  
Springfield, IL 62794-9276

WATER - M5

VIA FEDERAL EXPRESS

Re: Midwest Generation, LLC, Powerton Generating Station; ID No. 6282  
Compliance Commitment Agreement – ELUC/GMZ

Dear Mr. Dunaway:

On January 18, 2013, as part of fulfillment of an executed Compliance Commitment Agreement (CCA) dated October 24, 2012, Midwest Generation, LLC Powerton Station submitted to Illinois Environmental Protection Agency (IEPA) a proposed Groundwater Management Zone (GMZ) and a proposed Environmental Land Use Control (ELUC). The proposed ELUC was approved by IEPA in a letter dated August 26, 2013, however, IEPA did request one amendment to the proposed GMZ. Specifically, the IEPA requests that monitoring wells MW-1, MW-9 and MW-10 not be identified as “upgradient” monitoring points in the GMZ document. Even though these points may be up gradient of specific ash basins, they are not believed to be reliable up gradient monitoring points for historical ash related activities that may be impacting groundwater quality proximate to these wells. IEPA would prefer to identify the wells as either “side gradient” or “intermediate”.

KPRG and Associates, Inc. (KPRG), on behalf of Midwest Generation, is providing this response to the IEPA letter dated August 26, 2013. The following amendment to the GMZ Application, Part II, Item 5 dated January 18, 2013 is proposed:

5. Describe the groundwater monitoring network and groundwater and soil sampling protocols in place at the facility.

The existing IEPA approved groundwater monitoring network at the site consists of sixteen monitoring wells (MW-1 through MW-16) located around the three existing

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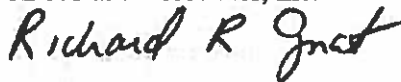
**MWG13-15\_11235**

ash basin (see Figure 3 in Attachment 2A). Wells MW-1, MW-9, and MW-10 are considered intermediate monitoring wells, being generally up gradient of the ash basins but still within an area of impacted groundwater from historical ash-related handling activities. Well MW-16 is considered an upgradient monitoring well, outside the area of groundwater impacts associated with historical ash-related handling activities. The remaining wells are considered downgradient monitoring points. The well borings were advanced using hollow-stem augers to depths ranging from approximately 30 to 45 feet below ground surface (bgs). The depth of a specific boring was terminated approximately 10 feet below the encountered water table. The wells were subsequently constructed using standard, 2-inch diameter PVC casing with 10-feet of 0.010 slot PVC screens. The wells were completed approximately three feet above grade with locking protective steel casings and bumper posts. The boring logs and well construction summaries are included in the above referenced Hydrogeologic Assessment Report (see discussion for item 2 above). The monitoring wells are sampled on a quarterly basis using low-flow sampling with a peristaltic pump. Field measurements of pH, specific conductivity, temperature, dissolved oxygen (DO) and oxidation-reduction potential (ORP) are recorded. Once collected, the samples are placed on ice and transported under a completed chain-of-custody to PDC Laboratories, Inc. which is an Illinois accredited analytical laboratory. The samples are analyzed for the inorganic compounds listed in 35 IAC 620.410(a) and (d), excluding radium 226/228.

There is no soil sampling that is performed as part of the approved site monitoring program.

Based on the IEPA letter dated August 26, 2013, it is understood that upon IEPA approval of the above amended wording, the GMZ will be approved as amended without the need for resubmitting the entire application document. If there are any questions, please contact me at 262-781-0475 or Ms. Maria Race of Midwest Generation at 630-771-7862.

Sincerely,  
KPRG and Associates, Inc.



Richard R. Gnat, P.G.  
Principal

cc: Ms. Maria Race, Midwest Generation EME, LLC  
Mr. Basil Constantelos, Midwest Generation EME, LLC  
Mr. William Gaynor, Midwest Generation, LLC  
Mr. Christopher Foley, Midwest Generation EME, LLC  
Ms. Susan Franzetti, Nijman Franzetti, LLP  
Mr. William E. Buscher, IEPA

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KPRG and Associates, Inc.

MWG13-15\_11236

From: (262) 781-0475  
 Richard Gnat  
 KPRG and Associates, Inc.  
 14045 W. Lisbon Rd.  
 Suite 2B  
 Brookfield, WI 53005

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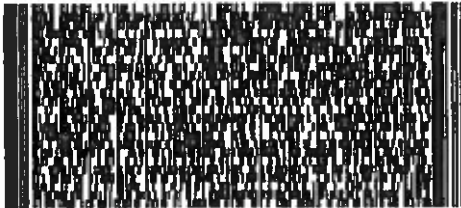
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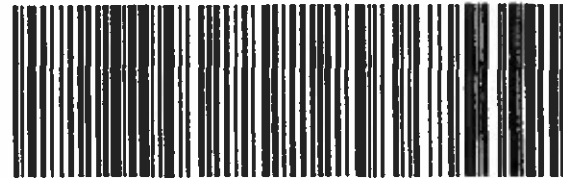
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