The East Fly Ash Pond will be dewatered to facilitate closure and closed in-place. The final cover will be sloped to promote drainage and the stormwater runoff will be discharged through the existing NPDES permitted outfall. Closure operations will involve: (i) regrade fill to create acceptable grades for closure and (ii) install final cover. The existing perimeter berms will remain intact and the final cover system will tie-in to these berms. In accordance with 257.302(b)(3), this initial written closure plan will be amended to provide additional details after the final engineering design for the grading and cover system is completed. This initial closure plan reflects the best information available to date.

The final cover system will be installed in direct contact with graded CCR or fill to achieve final subgrade elevations and will include: 1) 18" of compacted earthen material with a permeability of no greater than the permeability of the natural subsurface present at the site or no greater than 1x10⁻⁶ cm/sec, whichever is less (infiltration layer); 2) 6" of soil capable of sustaining native plant growth (erosion layer); and 3) planted with native grasses. The final cover slope will be a minimum of 2% and will be graded to convey stormwater runoff to discharge through the existing NPDES permitted outfall.

The final cover material will be placed and regraded as fill to bring the grade up to the design slopes. Earthen material for the infiltration layer will be placed, graded, and compacted to meet the thickness and permeability as discussed above. Earthen material will be placed to create a 6" soil erosion layer that will sustain native plant growth. The final cover surface will be seeded and vegetated.

The permeability of the final cover will be equal to or less than the permeability of the natural subsurface present or a permeability no greater than 1x10⁻⁶ cm/sec, whichever is less, and will be graded with a minimum 2% slope.

When the final design of the final cover system is completed, the written closure plan will be amended to include the detailed final design.

The permeability of the final cover will be equal to or less than the permeability of the natural subsurfaces present or no greater than 1x10⁻⁶ cm/sec, whichever is less. This will be verified during construction per the construction quality assurance plan to be developed in conjunction with the detailed amended closure plan.

The final cover will consist of a minimum 18" infiltration layer with a permeability equal to or less than the permeability of the natural subsurfaces present or no greater than 1x10⁻⁶ cm/sec, whichever is less. Erosion will be minimized with an erosion layer no less than 6" of earthen material capable of sustaining native plant growth. The final cover surface will be seeded and vegetated.

The final cover will be sloped to 2% to minimize infiltration and erosion, and at minimum, meets the requirements of (d)(3).
Certification Statement 40 CFR § 257.102 (b)(4) – Initial Written Closure Plan for a CCR Surface Impoundment or Landfill

CCR Unit: Dynegy Midwest Generation, LLC; Baldwin Energy Complex; East Ash Pond

I, Kenneth Berry, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above referenced CCR Unit, that the information contained in the initial written closure plan, dated November 18, 2015, meets the requirements of 40 CFR § 257.102.

KENNETH M. BERRY
Printed Name

NOVEMBER 18, 2015
Date

[Signature]

[License Number]
Certification Statement 40 CFR § 257.102 (d)(3)(iii) – Design of the Final Cover System for a CCR Surface Impoundment or Landfill

CCR Unit: Dynegy Midwest Generation, LLC; Baldwin Energy Complex; East Ash Pond

I, Kenneth Berry, being a Registered Professional Engineer in good standing in the State of Illinois, do hereby certify, to the best of my knowledge, information, and belief that the information contained in this certification has been prepared in accordance with the accepted practice of engineering. I certify, for the above referenced CCR Unit, that the design of the final cover system as included in the initial written closure plan, dated November 18, 2015, currently prepared meets the requirements of 40 CFR § 257.102.

KENNETH M BERRY
Printed Name

NOVEMBER 18, 2015
Date