

ANNUAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT REPORT
ASH POND 2 - JOLIET STATION 29
SEPTEMBER 2026

This annual hazard potential classification assessment report has been prepared for Ash Pond 2 at Joliet Station 29 in Joliet, Illinois. This report documents the annual hazard potential classification completed by a licensed professional engineer pursuant with Title 35 of the Illinois Administrative Code (35 IAC) Section 845.440(a) and Title 40 of the Code of Federal Regulations (40 CFR) Section 257.73(a)(2), herein referred to as to the regulations, respectively.

The purpose of this project is to review the hazard potential classification assessment by a licensed professional engineer to document the hazard potential classification in accordance with above referenced regulations. Civil & Environmental Consultants, Inc. (CEC) reviewed the initial 2016 and annual 2025 hazard potential classification reports and completed this 2026 hazard potential classification assessment by considering the possible adverse incremental consequences that result from the release of water or stored contents due to failure of the diked section or mis-operation of the diked basin or its appurtenances. The hazardous potential classifications considered include Class 1 or Class 2 under the State regulation, or defined as High Hazard, Significant Hazard, or Low Hazard under the federal regulation as follows:

35 IAC Section 845.120

Class 1 coal combustion residuals (CCR) surface impoundment means a diked surface impoundment where failure or mis-operation will probably cause loss of human life.

Class 2 CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.

40 CFR Section 257.53

High Hazard Potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation will probably cause loss of human life.

Significant Hazard CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life, but can cause economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns.

Low Hazard CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the surface impoundments owner's property.

The following sections provide a description of physical and operational features of Ash Pond 2 followed by an evaluation of potential failure scenarios that show the Ash Pond 2 is a Class 2 or Significant Hazard CCR surface impoundment.

1.0 SITE DESCRIPTION

Ash Pond 2 is located at Joliet Station 29 in Joliet, Illinois, situated between Pond 1 and Pond 3 along US Route 6. Pond 2 measures approximately 500 feet long and 285 feet wide and lined with a 60 mil high-density polyethylene liner. Ash Pond 2 is partially incised with the south and east boundary of Pond 2 is constructed with an earthen embankment. Gravel access roads are located along the north and east sides.

Ash Pond 2 is a CCR surface impoundment that only receives precipitation and stormwater through runoff. Placement of CCRs ceased in 2016 and placement of process water ceased in 2021. CEC inspected Ash Pond 2 on September 21, 2026, and at the time of our inspection, Ash Pond 2 contained no CCRs.

2.0 FAILURE EVALUATION

To evaluate the Ash Pond 2 hazard classification, CEC reviewed the initial 2016 hazard potential classification assessment prepared by Geosyntec Consultants and the 2025 annual hazard potential classification assessment prepared by Sargent & Lundy. The previous impacts as a result of failure or mis-operation of the Ash Pond 2 were evaluated. The following features were considered in determining the classification:

- Pond 2 has remained unchanged from the initial and previous impoundment inspections and hazard potential classification assessments.
- Relatively small in size, the impoundment contains no CCR, does not receive process water, and volume of water from precipitation and runoff is controlled at low levels through continued maintenance and inspection.
- A flexible membrane liner prevents water from seeping through the earthen embankment thereby preventing potential failure due to loss of embankment through piping.
- Joliet 29 Station is retired, with minimal on-site personnel. The south side is constructed with an earthen embankment. In the event of catastrophic failure or mis-operation, the downstream inundation area has buildings and is infrequently entered.
- Based on existing operations, in the event of catastrophic failure or mis-operation, the downstream inundation area is retired and consists of mostly unoccupied buildings with the Des Plaines River to the south.

3.0 HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

The hazard potential classification for the initial 2016 report established that Ash Pond 2 is a significant hazard potential in accordance with the federal regulation, while the annual 2025 hazard potential assigned a Class 2 classification in accordance with state regulation. Based on our review of the previous hazard potential classification reports, modification to Joliet 29 Station and operation of the impoundment between 2016 and 2026, and annual inspections, Ash Pond 2 remains classified as a Class 2 CCR surface impoundment in accordance with the state regulation and as a significant hazard in accordance with the federal regulation. Potential downstream inundation areas that could be impacted by a failure or mis-operation have abandoned buildings that are infrequently entered and the downstream areas are only occasionally accessed for mowing and inspection purposes that result in no probable loss of human life. Potential economic loss, environmental damage, disruption of lifeline facilities, and impact other concerns are also considered under these classifications.

4.0 LIMITATIONS AND CERTIFICATION

This Annual Hazard Potential Classification Assessment Report has been prepared pursuant to the CCR rule codified in Title 35 IAC Section 845.440 and 40 CFR Sections 257.73(a)(2) was prepared under the direction of Mr. M. Dean Jones, P.E.

By affixing my seal to this, I do hereby certify to the best of my knowledge, information, and belief that the information contained in this report is true and correct. I further certify I am licensed to practice in the State of Illinois and that it is within my professional expertise to verify the correctness of the information. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Seal:



Signature:

Name: M. Dean Jones, P.E.

Date of Certification: September 28, 2026

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2027