ANNUAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT REPORT
EAST ASH POND AND WEST ASH POND
WAUKEGAN STATION
OCTOBER 2026

This annual hazard potential classification assessment (HPCA) report has been prepared for the East Ash Pond and West Ash Ponds (Ponds) at Waukegan Station in Waukegan, 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 state or federal 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) CEC reviewed both the initial HPCA report prepared by Geosyntec Consultants in October 2016 with the previous annual report prepared by Sargent & Lundy in 2025.

The following sections provide a description of regulatory requirements, physical, and operational features of the ponds. The assessment considers 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.

1.0 REGULATION REQUIREMENTS

The hazardous potential classifications considered include 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 the Ponds followed by an evaluation of potential failure scenarios that show is the Ponds are a Class 2 or Significant Hazard CCR surface impoundment.

2.0 SITE DESCRIPTION

The Ponds are located at 401 East Greenwood Avenue in Waukegan, Illinois. The coal-fired units at Waukegan Station are currently retired and in the process of decommissioning. The East Ash Pond and West Ash Pond are both CCR surface impoundments with each pond approximately 10 acres in size. Both Ponds are CCR surface impoundment that only receive stormwater. Placement of CCRs and process water into the Ponds ceased in 2022. Placement of stormwater, other than direct precipitation, ceased on May 21, 2024.

CEC inspected both Ponds on September 25, 2026. At the time of our inspection, the Ponds contained remnant CCRs. CEC inspected the Ponds and found no signs of distress that would suggest the stability or operation of the impounding structure is compromised.

3.0 FAILURE EVALUATION

To evaluate the Ponds hazard classification, CEC reviewed the initial 2016 hazard potential classification assessment prepared by Geosyntec Consultants and the 2025 hazard potential classification assessment prepared by Sargent & Lundy. The previous impacts resulting from failure or mis-operation of the Ponds were evaluated. The following features were considered in determining the classification:

- The Ponds have remained unchanged from the initial and previous impoundment inspections and hazard potential classification assessments.
- Relatively small in size, the impoundment contains remnant 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.
- Waukegan Station is retired, with minimal on-site personnel. The Ponds are constructed with an earthen embankment.
- Based on existing operations, in the event of catastrophic failure or mis-operation, the downstream inundation areas are mostly unoccupied buildings to the north and occupied buildings to the south, with wetlands separating Waukegan Station from Lake Michigan to the east.

4.0 HAZARD POTENTIAL CLASSIFICATION ASSESSMENT

The hazard potential classification from the previous HPCA reports established that the Ponds have a significant hazard potential in accordance with the federal regulation, and a Class 2 classification in accordance with State of Illinois regulation. Based on our review of the previous

hazard potential classification reports and annual inspections and the reported modifications to the Station and operation of the impoundments, the Ponds remain classified as a Class 2 CCR surface impoundment and as a significant hazard. 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.

5.0 LIMITATIONS AND CERTIFICATION

This annual HPCA report has been prepared pursuant to the CCR rule codified in 35 IAC Section 845.440 and 40 CFR Section 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: October 20, 2026

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2027