EMERGENCY ACTION PLAN
EAST AND WEST ASH PONDS
WAUKEGAN STATION
UPDATED OCTOBER 2026

This emergency action plan (EAP) has been prepared pursuant with Title 35 of the Illinois Administrative Code (35 IAC) Section 845.520 and Title 40 of the Code of Federal Regulations (40 CFR) Section 257.73(a)(3) for the East and West Ash Ponds at the Midwest Generation, LLC (MWG) Waukegan Station (Station) in Waukegan, Illinois. This update includes a revised contact list and updated inundation maps. The EAP is presented as follows:

Section 1.0: Definition of the events or circumstances involving the coal combustion residuals (CCR) unit(s) that represent a safety emergency, along with a description of the procedures that will be followed to detect a safety emergency in a timely manner.

Section 2.0: Definition of the responsible persons, their respective responsibilities, and notification procedures in the event of a safety emergency involving the CCR unit(s) and contact information of emergency responders.

Section 3.0: Provide site maps which delineate the downstream areas which would be affected in the event of an East and West Ash Ponds failure and a physical description of the CCR units.

Section 4.0: Include provisions for an annual face-to-face meeting or exercise between representatives of the Station and local emergency responders.

Section 5.0: The owner or operator of the CCR unit(s) must obtain a certification from a qualified professional engineer stating that the written EAP, and any subsequent amendment of the EAP, meets the requirements of 35 IAC Section 845.520(e) and 40 CFR Section 257.73(a)(3)(iv).

1.0 DEFINITION OF THE EVENTS THAT REPRESENT A SAFETY EMERGENCY

The following tables define the events and/or circumstances involving the East and West Ash Ponds that represent a safety emergency, along with a description of the procedures that will be followed to detect a safety emergency in a timely manner.

The information provided in Tables 1 through 5 provides a listing of problems which may occur at the East and West Ash Ponds, how to make a rapid evaluation of the problem, and what action should be taken in response to the problem. This section presents only generalized information to aid in first response to a given problem. Suspected problems should be reported as soon as possible, as discussed in Section 2.0, and assistance from a qualified engineer should be obtained if necessary.

The problems outlined in this section are related to above grade, earthen type embankment dams similar in construction to the East and West Ash Ponds. The problems discussed herein include:

Table 1: Seepage;
Table 2: Sliding;
Table 3: Cracking;
Table 4: Animal Burrows and Holes; and
Table 5: Weather and Flooding.

For each problem, the indicators are discussed followed by evaluation techniques and then by action items for each problem.

Table 1: East and West Ash Ponds Event Definition, Evaluation and Action: Seepage

Definition	Evaluation	Action
1A: Wet area on downstream embankment slope or other area downstream of the embankment, with very little or no surface water or very minor seeps.	1B: Condition may be caused by infiltration of rainwater, which is not serious; or may be the start of a serious seepage problem, which would be indicated by a quick change to one of the conditions below.	1C: No immediate action required. Note the location for future comparison.
2A: Same wet area as above, with moderate seeps of clear or relatively clear water and the rate of flow not increasing.	2B: Measure the flow periodically and note changes in clarity.	2C: No immediate action required. Note the location, flow rate, and clarity for future comparison. During reservoir flood stages, the seepage area should be watched for changes.
3A: Same wet area as above, with moderate seeps of clear or relatively clear water and rate of flow increasing.	3B: Measure the flow periodically and note changes in clarity. Inspect downstream area for new seeps.	3C: Contact a qualified engineer (see Table 7) for immediate inspection. Observe the condition constantly for further changes in flow rate or clarity, unless notified otherwise by the engineer.
4A: Piping (seepage with the removal of materials from the foundation or embankment), moderate to active flows of cloudy to muddy water.	4B: If the water is cloudy to muddy, and the rate of flow is increasing, this condition could lead to failure of the dam. If, along the piping, there is an upstream swirl (whirlpool) caused by water entering through the abutments of embankment, failure is imminent.	4C: Immediate action is necessary. Notify the appropriate agencies (see Table 7).

5A: Boils (soil particles deposited around a water exit forming a cone, varying from a few inches in diameter spaced 2 to 3 feet apart to isolated locations several feet in diameter in the floodplain downstream of the dam) may show the types of flow as noted above.	5B: Evaluation of the problem is the same as noted above for the various flow conditions, i.e., clear and constant, clear and increasing, and cloudy or muddy and increasing.	5C: Actions to be taken are essentially the same as those noted above.

Table 2: East and West Ash Ponds Event Definition, Evaluation and Action: Sliding

Indicator	Evaluation	Action
1A: Movement of a portion of the embankment, either the upstream or downstream slope, toward the toe of the dam.	1B: Various degrees of severity of a slide require different responses. The first condition is that the slide does not pass through the crest and does not extend into the embankment for more than 5 feet., measured perpendicular to the slope.	1C: For this condition, a qualified engineer (see Table 7) should be consulted before repairs are initiated to determine the cause of the slide and to recommend modifications to prevent future slides. The downstream side of the dam should be watched for the emergence of water, either through the slide or opposite the slide. If water is noted discharging, the area should be treated as a seepage location and monitored as noted above.
2A: Slide passes is the second condition.	2B: In this condition, the slide passes through the crest and that the reservoir elevation is more than 10 feet below the lowered crest.	2C: Use the same actions as noted above and notify the appropriate MWG personnel (see Table 7) of the situation so they may be prepared to act if the condition worsens.
3A: Slide passes is also the third condition.	3B: In this condition, the slide passes through the crest and that the reservoir elevation is less than 10 feet below the lowered crest.	3C: This condition is critical, and failure of the dam should be considered imminent. Notify the appropriate agencies (see Table 7).

Table 3: East and West Ash Ponds Event Definition, Evaluation and Action: Cracking

Indicator	Evaluation	Action
1A: Cracks in the embankment can occur either in the longitudinal (along the length of the dam) or transverse (across the dam from upstream to downstream directions).	1B: Some cracking of the surface soils may occur when they become dry. This cracking is to be expected, and no further action is required.	1C: No further action is required.
2A: Longitudinal cracking can indicate the beginning of a slide or be an uneven settlement of the embankment.	2B: Monitor the crack for future changes, and contact a qualified engineer for assistance in the evaluation of the crack and recommended repairs.	2C: Contact a qualified engineer for assistance and recommendations (see Table 7).
3A: Transverse cracking can indicate uneven settlement or the loss of support below the crack. Such cracks usually occur over an outlet conduit, near the abutments, or in the taller portion of the embankment.	3B: Monitor the crack for future changes, and contact a qualified engineer for assistance in the evaluation of the crack and recommended repairs.	3C: Contact a qualified engineer for assistance and recommendations (see Table 7).

Table 4: East and West Ash Ponds Event Definition, Evaluation and Action: Animal Burrows and Holes

Indicator	Evaluation	Action
1A: Holes in the embankment, varying in size from about 1 inch in diameter to 1 foot in diameter caused by animals.	1B: If the holes do not penetrate through the embankment, the situation is usually not serious. Some animal holes will have soil pushed out around the hole in a circular fashion, which may look like a boil (crayfish or crawdad). Watch for the movement of water and soil particles from these holes to determine whether they are boils.	1C: Backfill as deeply as possible with impervious material. If rodents become a nuisance, an effective rodent control program, as approved by the Illinois Department of Natural Resources District Wildlife Biologist, should be implemented.

Table 5: Problem Event Definition, Evaluation and Action: Weather and Flooding

Indicator	Evaluation	Action
1A: The East and West Ponds are out of service and only receive water from precipitation without potential for flooding.	1B: The East and West Ponds are inspected by a qualified person on a weekly basis and after precipitation events greater than 6.20 inches. Results of the inspections including water depth are entered into the operating record.	1C: If water accumulates, report the need to inspect and pump down the impoundments.
2A: If either the East Ash Pond or West Ash Pond reservoir level reaches a depth of 3.0 feet, respectively and it is currently raining, a flood warning will be disseminated through the appropriate notifications as outlined in the above tables and Table 7.	2B: The East and West Ash Ponds dam and appurtenances will be monitored continuously until the reservoir level falls to below a depth of 3.0 feet and the rain has stopped.	2C: Contact a qualified engineer for assistance and recommendations (see Table 7).

2.0 RESPONSIBLE PERSONS, RESPECTIVE RESPONSIBILITIES AND NOTIFICATION PROCEDURES

The EAP must be implemented once events or circumstances involving the CCR unit that represents a safety emergency are detected, including conditions identified during periodic structural stability assessments, annual inspections, and inspections by a qualified person. The following sections define responsible persons, their respective responsibilities, and notification procedures in the event of a safety emergency involving the East and West Ash Ponds. Contact information is provided in Table 7, attached.

2.1 Responsible Persons and Responsibilities

Appropriate parties will be notified based on the nature and severity of the incident as determined by the Station environmental specialist. If failure is imminent or has occurred, notification and mitigation procedures are a top priority, particularly for a potentially hazardous situation. The Station environmental specialist, in conjunction with the general manager, is responsible for this determination.

2.2 Notification Sequence

The following notification procedures shall be used by employees in the event of a safety emergency with the East and West Ash Ponds.

(1) Notify the operations manager and environmental specialist, or alternate.
(2) If unsafe conditions exist, the employee should evacuate the area.
(3) Only the environmental specialist or designated alternate shall have any official communication with non-employees or regulatory agencies, and only the communications director shall have any contact with the media.

The environmental specialist or designated alternate should follow these procedures in the event of a safety emergency involving the East and West Ash Ponds:

(1) Organize appropriately trained Station personnel and/or other employees or contractors as necessary to assist with the safety emergency.
(2) After consultation with appropriately trained Station personnel, contact the proper civil authorities (e.g., fire, police, etc.) if necessary. Notify the appropriate agencies where there has been a reportable release of material(s) into the environment. See Table 7, attached for contact information. Notify MWG Corporate via the Intelex online notification system within twenty-four hours in the event of a reportable release. A reportable release is a Material Release defined as a spill or leak that materialized in the waterway. A Non-Material Release is a spill or leak that did not come into contact with the waterway.
(3) Be prepared to evacuate the potential inundation areas at any time during the safety emergency response.
(4) If the emergency is beyond the Station's response capabilities, contact one or more emergency response contractors, as necessary.
(5) Corrective actions should only be performed by properly trained individuals.

2.3 Emergency Responders Contact Information

Contact information for emergency responders, contractors and consultants are provided in Table 7, attached. The Station environmental specialist or alternate will determine who to notify, including any affected residents and/or businesses, in the case of an imminent or actual CCR surface impoundment dam failure. The Station environmental specialist or alternate will ensure proper notifications are made.

Appropriate contractors will be utilized to assist the Station environmental specialist or alternate with mitigated actions being undertaken in order to minimize the impact of an event that has occurred.

3.0 SITE MAP AND A SITE MAP DELINEATING THE DOWNSTREAM AREA

The following section provides a physical description of the East and West Ash Ponds. A site vicinity map is provided as Figure 1, attached. Drawings depicting the locations of, and the downstream areas affected by, a potential failure of the East and West Ash Ponds were prepared by Sargent & Lundy as part of the 2025 Hazard Potential Classification Assessment dated October 13, 2025 and are provided in Attachment A.

3.1 Pond Locations and Descriptions

The East and West Ash Ponds are located in the southeastern portion of Waukegan Station (see Figure 1). The East and West Ash Ponds are south of the Power Block Building and Coal Pile.

The East and West Ash Ponds are out of service. Both ponds are lined CCR surface impoundments with each pond approximately 10 acres in size. The West Ash Pond is nearly empty of CCR and the East Ash Pond is partially full. Both ponds only accept direct precipitation, and water levels are managed to keep them from being full (drain valves remain open).

Placement of CCRs and placement of process water into the East and West Ash Ponds ceased in 2022. Placement of stormwater, other than direct precipitation, ceased on May 21, 2024. The East and West Ash Ponds are formed by embankments to the south, east and west with abroad at grade fill areas to the west. An earthen berm is located west of the West Ash Pond, which diverts stormwater from areas west of the East and West Ash Ponds toward the south. Due to the topographic constraints, run-on to the East and West Ash Ponds is generally limited to the embankment crests. Physical characteristics of the East and West Ash Ponds are provided in Table 6, below.

Table 6: Pond Characteristics

	East Ash Pond	West Ash Pond
Estimated Capacity (acre-feet)	113.7	138.5
Estimated Maximum Pond Depth (feet)	14.5	17.5
Elevation - Maximum Crest (feet msl.)	603	603

3.2 Delineation of Downstream Areas

The potential impacts from failure of the East and West Ash Ponds were evaluated and reported by Sargent & Lundy as part of the 2025 Hazard Potential Classification Assessment dated October 13, 2025. A copy of the hazard potential classification assessment is contained on the CCR Rule Compliance Data and Information website (https://midwestgenerationllc.com/illinois-ccr-rule-compliance-data-and-information/).

Results of the hazard potential classification assessment indicate that both the East and West Ash Ponds are classified as Class 2 pursuant to state regulations, and as significant hazard potential CCR surface pursuant to federal regulations. The evaluation reports the East and West Ponds are classified as significant hazard potential surface impoundments because their failure would not result in probable loss of life, but could result in impacts to Lake Michigan, creating potential economic loss and environmental damage. Occupied buildings affected as a result of an embankment failure are considered in a low danger zone which corresponds to zero lives in serious danger from a release. Inundation maps are provided in Appendix A.

4.0 ANNUAL FACE-TO-FACE MEETING

A face-to-face meeting or an exercise between representatives of the Station and the local emergency responders shall be offered and, if accepted, held on an annual basis. The purpose of

the annual meeting is to review the EAP to assure that contacts, addresses, telephone numbers, etc. are current. The annual meeting will be held whether or not an incident occurred in the previous year. In the event an incident occurs, the annual meeting date may be moved up in order to discuss the incident closer to the date of occurrence. If no incidents have occurred, the annual meeting will be held to inform local emergency responders on the contents of the EAP and changes from the previous year. Documentation of the annual face-to-face meeting will be recorded and placed in the operating record for the Station.

The EAP requires modification whenever there is a change in conditions that would substantially affect the EAP in effect. Changes to the plan shall be made as appropriate, and a copy of the changes will be kept at the Station, with the revised EAP placed in the facility's operating record. The written EAP must be evaluated, at a minimum, every five years to ensure the information required is accurate.

5.0 LIMITATIONS AND CERTIFICATION

This emergency action plan was prepared to meet the requirements of both 35 IAC Section 845.520(e) and 40 CFR Section 257.73(a)(3)(iv).35 IAC Section 845.520 and 40 CFR Section 257.73(a)(3) and was prepared under the direction of Mr. Derek J. Dorsz, 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: _____

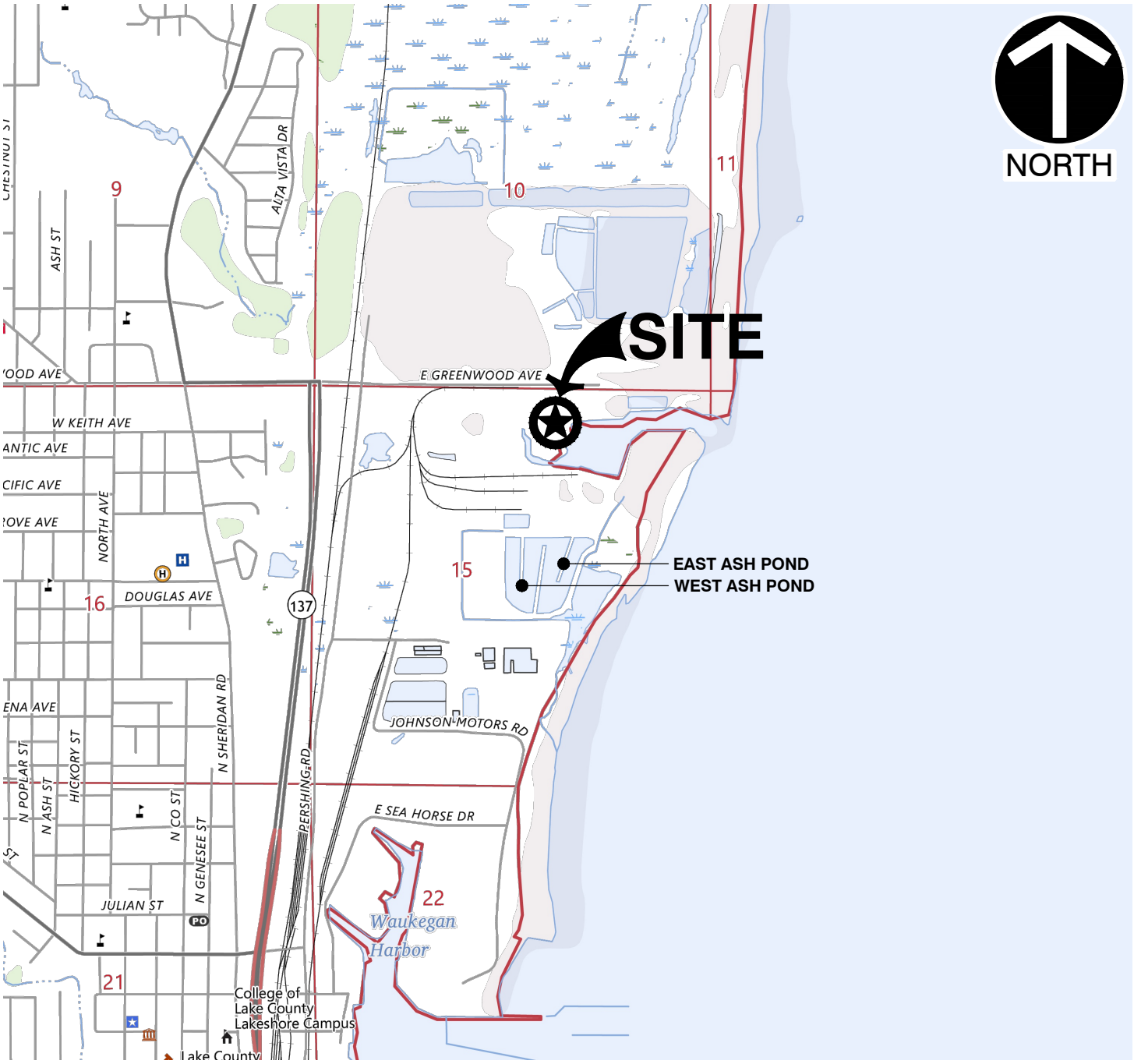
Name: Derek J. Dorsz, P.E.

Date of Certification: October 23, 2026

Illinois Professional Engineer No.: 062-073648

Expiration Date: November 30, 20252027

FIGURE



REFERENCE

1. U.S.G.S. 7.5' TOPOGRAPHIC MAP, ZION QUADRANGLE, IL DATED 2024.
2. U.S.G.S. 7.5' TOPOGRAPHIC MAP, WAUKEGAN QUADRANGLE, IL DATED: 2024.

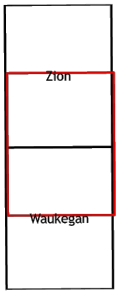
SCALE IN FEET

0 2000 4000

*HAND SIGNATURE ON FILE



QUADRANGLE LOCATION



ADJOINING QUADRANGLES

Civil & Environmental Consultants, Inc.
1230 East Diehl Road
Suite 200
Naperville, IL 60563
Ph: 630.963.6026
www.cecinc.com

WAUKEGAN STATION
EAST AND WEST ASH PONDS
WAUKEGAN, ILLINOIS

SITE VICINITY MAP

DRAWN BY:	DJD	CHECKED BY:	DJD	APPROVED BY:	MDJ*	FIGURE NO.:	1
DATE:	10/20/2026	DWG SCALE:	1"=2000'	PROJECT NO:	302-771.0226		

Drawing1.dwg{LAYOUT1} LS:(---- - ddorsz) - LP: 10/21/2026 2:49 PM

TABLE 7

EAP NOTIFICATION LIST

Table 7: Midwest Generation Waukegan Station
CCR Surface Impoundment EAP Notification List

Emergency Coordinators **Phone Number**

Plant Contacts:

Name	Title	Contact Info
Mark Wehling	Environmental Specialist	847-313-9742
Mike Brown	Operations Supervisor	847-456-8994
Chris Lux	Operations and Maintenance Manager	847-456-4641
Phillip Raush	General Manager, NE Region	815-715-8532

Corporate Support:

Name	Title	Contact Info
Sharene Shealey	Senior Director, Environmental	724-255-3220
Tony Shea	Senior Director - Environmental Compliance	609-651-6478
Jill Buckley	Senior Manager, Environmental	570-948-1679
Erik Linden	Senior Director, Communications (point of public contact)	(C) 609-613-1470
Maddie Cresswell	Communications Specialist	(C) 832-823-8847

Emergency Response Agencies:

Agency	Address	Contact Info
National Response Center (NRC)	NA	800-424-8802
Illinois Department of Natural Resources, Office of Water Resources	One Natural Resources Way, 2nd Floor Springfield, Illinois 62702-1271	8:30AM–5:00PM 217-785-3334
Illinois Emergency Management Agency (IEMA)	110 East Adams Springfield, Illinois 62701	800-782-7860
Illinois Environmental Protection Agency (IEPA)	Bureau of Water 2520 West Iles Avenue P.O. Box 19276 Springfield, Illinois 62794	217-782-3637
Lake County Emergency Management Agency Operations Center	1303 North Milwaukee Avenue Libertyville, Illinois 60048	Phone: 847-377-7100 24-Hour: 9-1-1
Lake County ETSB: Dispatches to Fire, Police and Emergency Medical services	1300 Gilmer Road Volo, Illinois 60073	Emergency: 9-1-1 Non-Emergency: 847-487-8163
Waukegan Police Department	1101 Belvidere Street Waukegan, Illinois 60085	Emergency: 9-1-1 Non-Emergency: 847-360-9000
Waukegan Fire Department	101 North West Street Waukegan, Illinois 60085	Emergency: 9-1-1 Non-Emergency: 847-249-5410

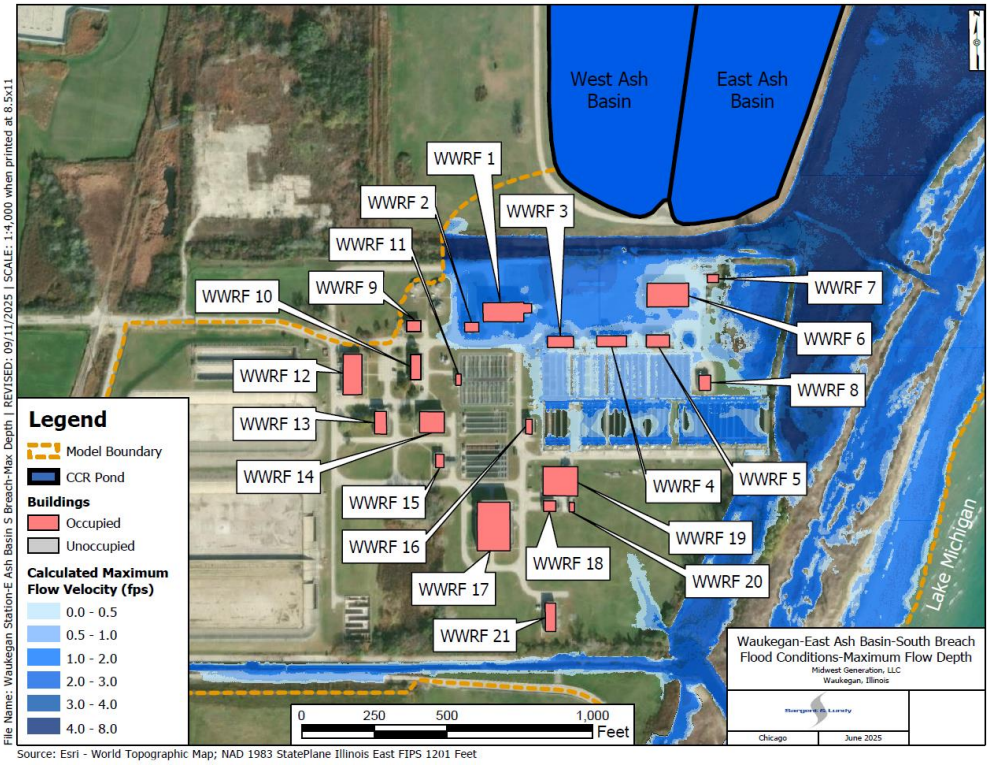
Environmental Response Contractors/Consultants:

Contractor/Consultant	Address	Contact Info
Civil & Environmental Consultants, Inc.	1230 East Diehl Road, Suite 200 Naperville, Illinois 60563	630-963-6026
Bluff City Materials (Earthwork Contractor)	2252 Southwind Boulevard Bartlett, Illinois 60103	630-497-8700
SET Environmental (Spill Response)	450 Sumac Road Wheeling, Illinois 60090	847-850-1056 877-437-7455 (24-hour)

APPENDIX A

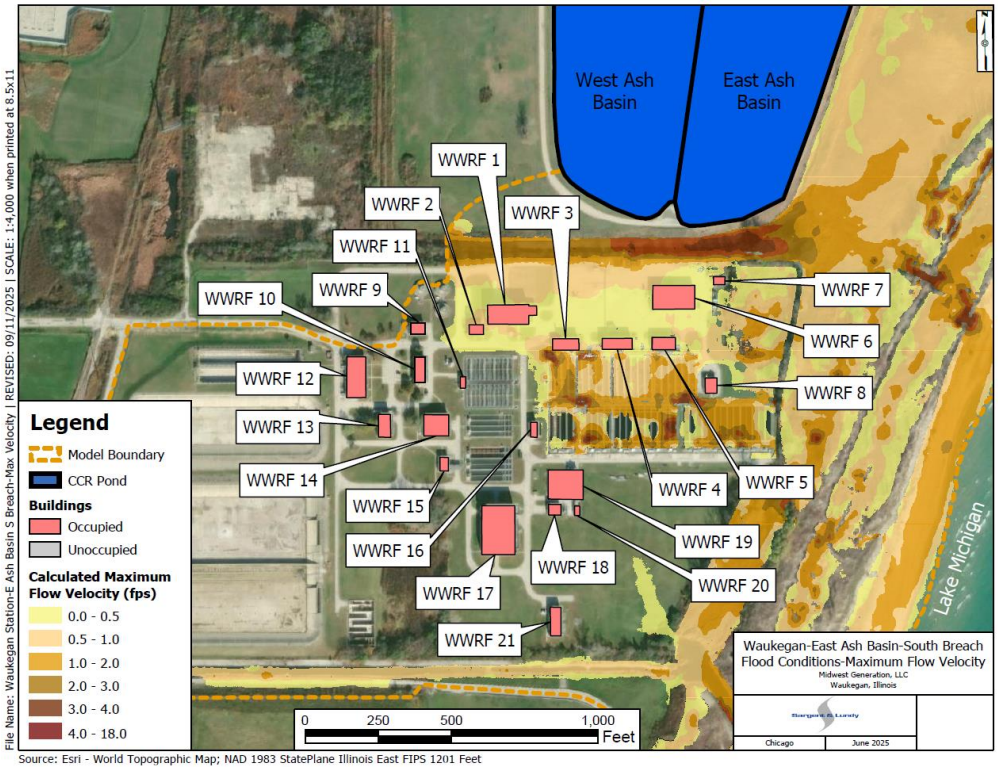
SARGENT & LUNDY HAZARD POTENTIAL CLASSIFICATION ASSESSMENT INUNDATION MAPS

Figure 5-1 – Maximum Flow Depth from Breach at East Ash Pond South Dike



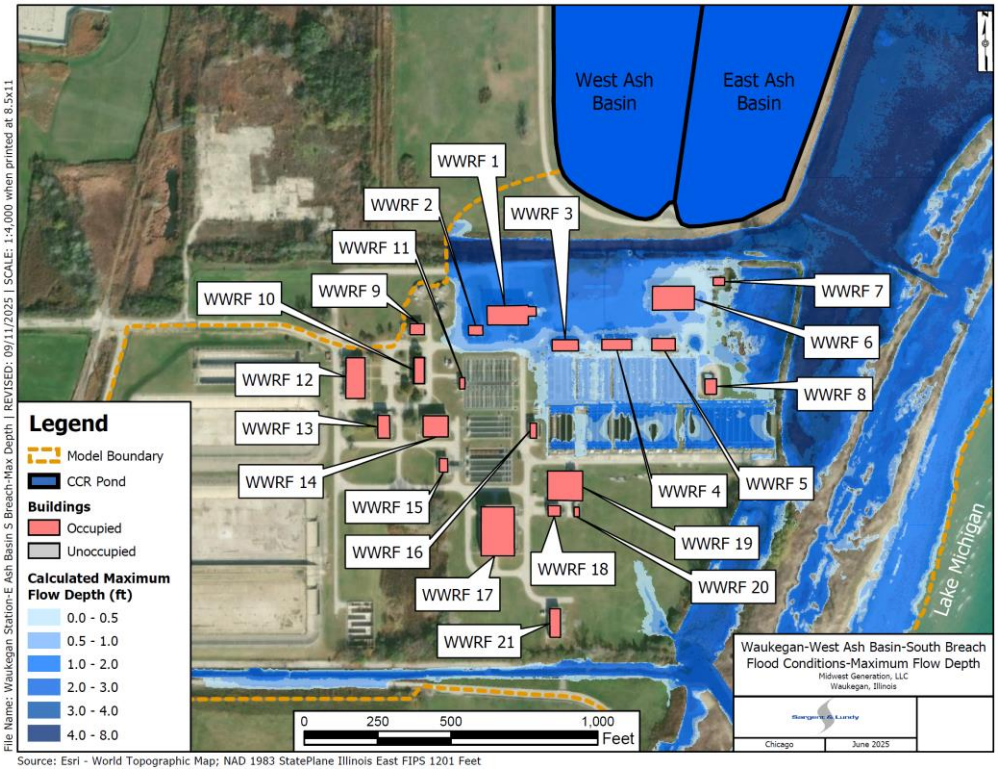
Source: Esri - World Topographic Map; NAD 1983 StatePlane Illinois East FIPS 1201 Feet

Figure 5-2 – Maximum Flow Velocity from Breach at East Ash Pond South Dike



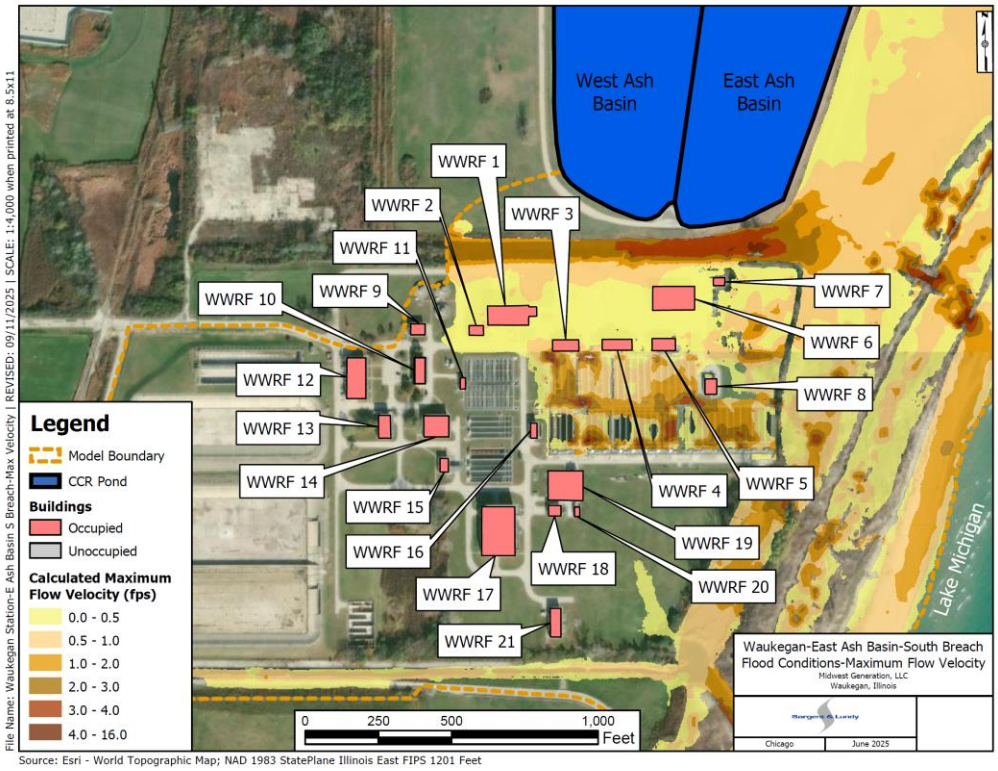
Source: Esri - World Topographic Map; NAD 1983 StatePlane Illinois East FIPS 1201 Feet

Figure 5-3 – Maximum Flow Depth from Breach at West Ash Pond South Dike



Source: Esri - World Topographic Map; NAD 1983 StatePlane Illinois East FIPS 1201 Feet

Figure 5-4 – Maximum Flow Velocity from Breach at West Ash Pond South Dike



Source: Esri - World Topographic Map; NAD 1983 StatePlane Illinois East FIPS 1201 Feet

Figure 5-5 – Maximum Flow Depth from Breach at East Ash Pond North Dike

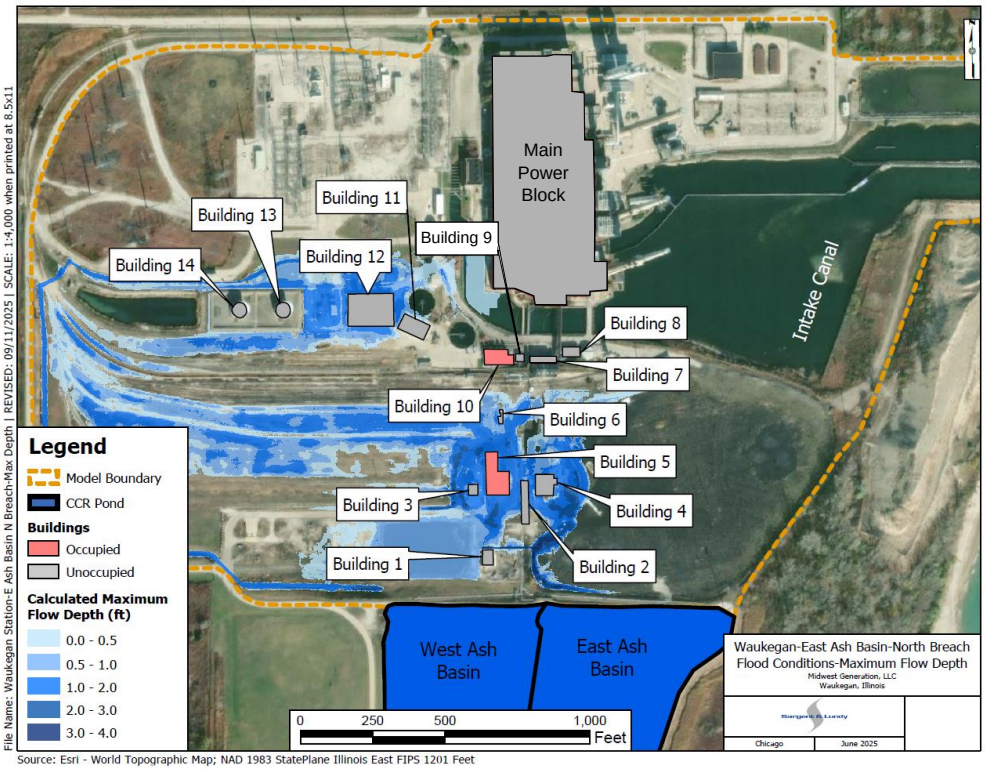


Figure 5-6 – Maximum Flow Velocity from Breach at East Ash Pond North Dike



Figure 5-7 – Maximum Flow Depth from Breach at West Ash Pond North Dike

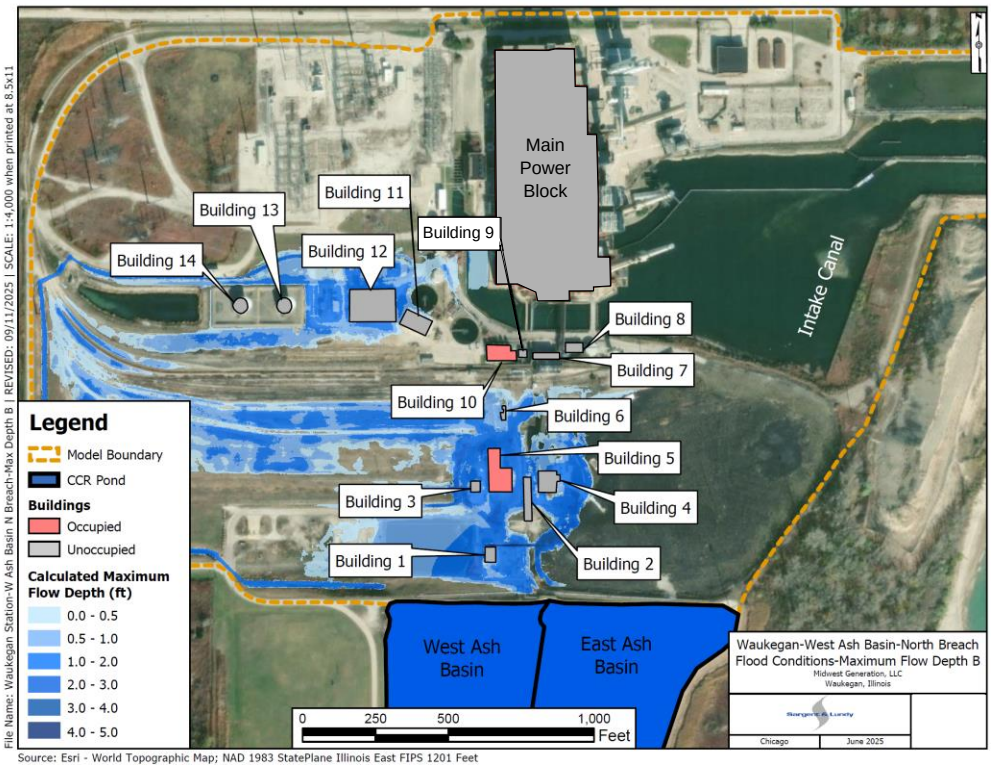


Figure 5-8 – Maximum Flow Velocity from Breach at West Ash Pond North Dike

