INFLOW DESIGN FLOOD CONTROL SYSTEM PLAN
EAST ASH POND AND WEST ASH POND
WAUKEGAN STATION
OCTOBER 2026

This inflow design flood control system plan has been prepared for the East Ash Pond and West Ash Pond (Ponds) at Waukegan Station in Waukegan, Illinois (the Station). The purpose of this project is to prepare the inflow design flood control system plan by a licensed professional engineer to ensure that the design, construction, operation, and maintenance of the coal combustion residuals (CCR) unit is consistent with recognized and generally accepted good engineering standards. This plan has been prepared pursuant with Title 35 of the Illinois Administrative Code (35 IAC) Section 845.510 and Title 40 of the Code of Federal Regulations (40 CFR) Section 257.82.

Civil & Environmental Consultants, Inc. (CEC) completed the following scope of services in preparing this annual inspection report:

- Performed the annual CCR impoundment inspection in accordance with the requirements of 35 IAC Section 845.540 and 40 CFR Section 257.83.

- Reviewed both the initial 2016 inflow design flood control system plan and the 2025 inflow design flood control system plan for the Ponds, including information pertaining to the following:
    - Inputs and assumptions used to determine whether the impoundment can manage the inflow design flood;
    - Methodology used to determine whether the impoundment can manage the inflow design flood;
    - Assessed potential changes to the design inputs used in the hydrologic and hydraulic assessments completed for the impoundment; and
    - Reviewed and assessed the results of the hydrologic and hydraulic calculations performed to support the conclusion of whether the impoundment meets the hydrologic and hydraulic requirements for CCR surface impoundments promulgated by both 35 IAC Section 845.510 and 40 CFR Section 257.82.

1.0 SITE DESCRIPTION

The Ponds are located at 401 East Greenwood Avenue in Waukegan, Illinois. The coal-fired units at the Station are currently retired and in the process of decommissioning. The Pond are both CCR surface impoundments with each pond approximately 10 acres in size. Both Ponds are CCR surface impoundments 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 pond and found no signs of distress that would suggest the stability or operation of the impounding structure is compromised.

2.0 INPUTS

2.1 Inflow Design Flood Control System

The inflow design flood control system plan for the Ponds are documented in the Ponds' initial inflow design flood control system plan, in October 2016, and subsequent annual plan prepared in 2025. Other than shut down and decommissioning of the coal-fired units, coupled with retirement of the Ponds, there have been no documented changes to the inflow design flood control system since the initial inflow design flood control system plan.

2.2 Inflow Design Flood Event

The Ponds are classified as a Class 2 CCR surface impoundment pursuant to 35 IAC Section 845.440(a)(1) and as a significant hazard potential CCR surface impoundment pursuant to 40 CFR Section 257.73(a)(2). The inflow design flood event used in the 2016 and subsequent annual hydrologic and hydraulic assessments were based on the 1,000-year storm. The precipitation depth for the 1,000-year, twenty-four-hour storm event is 8.30 inches, unchanged from the previous assessments.

2.3 Site Topography

The topography of and areas surrounding the Ponds has remained unchanged since the initial assessments conducted in 2016.

2.4 Aerial Images

Other than removal of CCRs from the Ponds and recent Station decommissioning activities, aerial images of the Station and the areas surrounding the Ponds show the site has remained relatively unchanged since the initial assessment conducted in 2016.

2.5 Ash Pond Condition

The operating and physical conditions of the Ponds are based on discussions with Station personnel and observations from the 2026 annual inspection. Placement of CCRs and process water into the Ponds ceased in 2022. Placement of stormwater, other than direct precipitation, ceased on May 21, 2024. Other than removal of CCRs, the condition of the Ponds has been unchanged since 2016.

3.0 ASSUMPTIONS

There are no assumptions in this document that require verification.

4.0 HYDROLOGIC AND HYDRAULIC ASSESSMENT

The inputs for the latest hydrologic and hydraulic calculations performed for the Ponds were reviewed to determine if changes have occurred since these previous calculations. No changes were identified thereby resulting in no impact on the results and conclusions of the 2025 calculations. Hydrologic and hydraulic calculations performed for 2025 inflow design flood control system plan for the Pond are considered valid.

5.0 CONCLUSIONS

Based on results of the 2026 impoundment inspection and review of the initial 2016 and 2025 inflow design flood control system plans, the Ponds have adequate hydraulic capacity to retain the 1,000-year flood event without water discharging from or overtopping the pond berms. Therefore, provided the Station maintains a low water level, the Ponds can collect and control the inflow design flood event specified in Section 845.510 and Section 257.82.

6.0 LIMITATIONS AND CERTIFICATION

This inflow design flood control system plan was prepared to meet the requirements of 35 IAC Section 845.510 and 40 CFR Section 257.82 and 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