ANNUAL INSPECTION REPORT
EAST ASH POND AND WEST ASH POND
WAUKEGAN STATION
OCTOBER 2026

This annual inspection report has been prepared pursuant to both Title 35 of the Illinois Administrative Code (35 IAC) Part 845, Subpart E, Section 845.540(b) and Title 40 Code of Federal Regulation (40 CFR) Section 257.83(b) for the East Ash Pond and West Ash Pond at Waukegan Station (Station) in Waukegan, Illinois. The purpose of this project is to perform the annual inspection of the Eash Ash Pond and West Ash Pond 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.

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

- CEC reviewed the weekly and monthly inspection reports completed by a qualified person employed by Midwest Generation, LLC, and the previous annual inspection report.

- CEC performed the annual inspection in accordance with the requirements of 35 IAC Section 845.540(b) and 40 CFR Section 257.83(b) including observations pertaining to the following:

    - Changes in Geometry: Observations of changes in the geometry of the East Ash Pond and West Ash Pond since the previous annual inspection.

    - Instrumentation: Inspection of the location and type of existing instrumentation and documentation of the maximum recorded readings of each instrument since the previous annual inspection from records provided by the Station.

    - Capacity and Impounded Volume: Inspection observations for the approximate minimum, maximum, and present depth and elevation of the impounded water and CCR; storage capacity of the impounding structure at the time of the inspection; and the approximate volume of the impounded water and CCR at the time of the inspection.

    - Structural/Operational Observations: Estimation of the approximate volume of the impounded water and CCR at the time of the inspection.

    - Other Changes: Inspection including change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.

The Station is located at 401 East Greenwood Avenue in Waukegan, Illinois and the coal-fired units 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 placement of process water ceased in 2022. Placement of stormwater, other than direct precipitation, ceased on May 21, 2024. CEC inspected both the East Ash Pond and West Ash Pond 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.

1.0 CHANGES IN GEOMETRY

Both the East Ash Pond and West Ash Pond geometry were observed to be unchanged since the October 2025 inspection.

2.0 INSTRUMENTATION

Instrumentation associated with the ponds included a water level monitoring device in the west outlet structure for the West Ash Pond. Our interview with Station personnel and review of weekly inspection reports concluded that the water level monitors are operating properly. No other instrumentation was reported or observed that would be associated with the hydraulic structures, impoundment embankments, and/or slope performance.

3.0 CAPACITY AND IMPOUNDED VOLUME

Capacity and impounded volumes for the East Ash Pond and West Ash Pond and estimated depth of impounded water and CCR are represented in Table 1 and 2, attached. Volumes and depths were determined by reviewing inspection reports, construction drawings, and from modeling using existing topographic data.

4.0 STRUCTURAL/OPERATIONAL OBSERVATIONS

Both the East Ash Pond and West Ash Pond were inspected for signs of distress that would have the potential to disrupt operation and safety of the ponds. None were observed. Prior to inspection, CEC reviewed the previous annual inspection reports, which did not identify conditions that indicate an actual or potential structural weakness. Weekly inspection reports were also reviewed and did not indicate an actual or potential structural weakness.

5.0 OTHER CHANGES

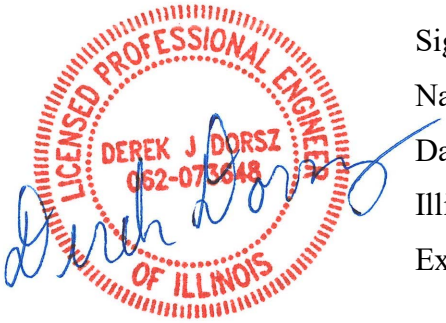
The East Ash Pond and West Ash Pond were inspected for other signs of other changes or distress that would have the potential to disrupt operation and safety of the ponds. Our inspection showed no distresses that would affect the operation and/or stability of either the East Ash Pond or West Ash Pond.

6.0 LIMITATIONS AND CERTIFICATION

This annual inspection report was prepared to meet the requirements of 35 IAC Section 845.540(b) and 40 CFR Section 257.83(b) 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: Derek Dorsz

Name: Derek J. Dorsz, P.E.

Date of Certification: October 20, 2026

Illinois Professional Engineer No.: 062-073648

Expiration Date: November 30, 2027

Table 1: Inspection Summary - East Ash Pond

Category	Regulation Reference	Evaluation	Recommended Action
Change in Geometry	§ 845.540(b)(2)(A) § 257.83(b)(2)(i)	None	None
Instrumentation	§ 845.540(b)(2)(B) § 257.83(b)(2)(ii)	None	None
Water Depth	§ 845.540(b)(2)(C) § 257.83(b)(2)(iii)	0.0 Feet, minimum 0.0 Feet, at inspection 0.0 Feet, maximum	None
CCR Depth	§ 845.540(b)(2)(C) § 257.83(b)(2)(iii)	2 to 14 Feet	None
Estimated Storage Capacity	§ 845.540(b)(2)(D) § 257.83(b)(2)(iv)	143.8 Acre Feet	None
Impounded Water Volume	§ 845.540(b)(2)(E) § 257.83(b)(2)(v)	0 Acre Feet	None
Impounded CCR Volume	§ 845.540(b)(2)(E) § 257.83(b)(2)(v)	26 Acre Feet	None
Structural/Operational Observations	§ 845.540(b)(2)(F) § 257.83(b)(2)(vi)	No longer accepting CCR	None
Other Changes	§ 845.540(b)(2)(G) § 257.83(b)(2)(vii)	None	None

Table 2: Inspection Summary - West Ash Pond

Category	Regulation Reference	Evaluation	Recommended Action
Change in Geometry	§ 845.540(b)(2)(A) § 257.83(b)(2)(i)	None	None
Instrumentation	§ 845.540(b)(2)(B) § 257.83(b)(2)(ii)	Water level at outlet structure	None
Water Depth	§ 845.540(b)(2)(C) § 257.83(b)(2)(iii)	< 1 Foot, minimum < 1 Foot, at inspection < 1 Foot, maximum	None
CCR Depth	§ 845.540(b)(2)(C) § 257.83(b)(2)(iii)	Less than 1 Foot	None
Estimated Storage Capacity	§ 845.540(b)(2)(D) § 257.83(b)(2)(iv)	138.5 Acre Feet	None
Impounded Water Volume	§ 845.540(b)(2)(E) § 257.83(b)(2)(v)	Less Than 1 Acre Feet	None
Impounded CCR Volume	§ 845.540(b)(2)(E) § 257.83(b)(2)(v)	Less Than 6 Acre Feet	None
Structural/Operational Observations	§ 845.540(b)(2)(F) § 257.83(b)(2)(vi)	No longer accepting CCR	None
Other Changes	§ 845.540(b)(2)(G) § 257.83(b)(2)(vii)	None	None