INITIAL ANNUAL INSPECTION REPORT
OLD POND
WAUKEGAN STATION
OCTOBER 2026

This initial annual inspection report has been prepared pursuant to Title 35 of the Illinois Administrative Code (35 IAC) Part 845, Subpart E, Section 845.540(b) for the Old Pond at Waukegan Station (Station) in Waukegan, Illinois. The purpose of this project is to perform the annual inspection of the Old 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.

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

    - Changes in Geometry: Observations of changes in the geometry of the Old 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 Old Pond is approximately 11 acres in size and designated as an inactive CCR surface impoundment under the Illinois CCR Rule. From the 1940s through the late 1970s, sluiced CCR was placed in this area. In the late 1970s, the Old Pond was closed and has remained in a grassy condition since that time. CEC inspected the Old Pond on September 25, 2026 and found no signs of distress that would suggest the stability or integrity of the impounding structure is compromised.

1.0 CHANGES IN GEOMETRY

The Old Pond geometry was observed to be unchanged from review of historic aerial photographs and from previous inspections of the adjacent East Ash Pond and West Ash Pond.

2.0 INSTRUMENTATION

No instrumentation was reported or observed that would be associated with the Old Pond. No hydraulic structures, impoundment embankments, and/or slope performance were observed.

3.0 CAPACITY AND IMPOUNDED VOLUME

Depths, elevations, approximate storage capacity, and approximate volume of CCR within the Old Pond are unknown due to limited construction history and subsurface data. There is no impounded water in the Old Pond. Available information is summarized in Table 1, attached.

4.0 STRUCTURAL/OPERATIONAL OBSERVATIONS

The Old Pond was inspected for signs of distress that would have the potential to disrupt the safety of the impoundment. None were observed. Weekly inspection reports were reviewed and did not indicate an actual or potential structural weakness.

5.0 OTHER CHANGES

The Old Pond was inspected for other signs of other change or distress that would have the potential to disrupt safety of the ponds. Our inspection showed no distresses that would affect the stability of the Old Pond.

6.0 LIMITATIONS AND CERTIFICATION

This annual inspection report was prepared to meet the requirements of 35 IAC Section 845.540(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: _____

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 - Old Pond

Category	Regulation Reference	Evaluation	Recommended Action
Change in Geometry	§ 845.540(b)(2)(A)	None	None
Instrumentation	§ 845.540(b)(2)(B)	None	None
Water Depth	§ 845.540(b)(2)(C)	No Water	None
CCR Depth	§ 845.540(b)(2)(C)	Unknown[1]	None
Estimated Storage Capacity	§ 845.540(b)(2)(D)	Unknown[1]	None
Impounded Water Volume	§ 845.540(b)(2)(E)	No Water	None
Impounded CCR Volume	§ 845.540(b)(2)(E)	Unknown[1]	None
Structural/Operational Observations	§ 845.540(b)(2)(F)	No longer accepting CCR	None
Other Changes	§ 845.540(b)(2)(G)	None	None

(1) Unknown due to limited construction history and subsurface data.