ANNUAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT REPORT
ASH PONDS 1N AND 1S
WILL COUNTY STATION
OCTOBER 2026

This annual Hazard Potential Classification Assessment (HPCA) report has been prepared pursuant to the coal combustion residuals (CCR) rule codified in Title 35 of the Illinois Administrative Code (35 IAC) Section 845.440(a) for Ash Ponds 1N and 1S at Will County Station in Romeoville, Illinois (Station). The purpose of this project is to perform the annual HPCA by a licensed professional engineer to document the hazard potential classification as either a Class 1 or a Class 2 surface impoundment including the basis for the determination. The site is a former coal-fired power station owned and operated by Midwest Generation, LLC.

1.0 SUMMARY

In completing the 2026 HPCA, CEC reviewed the results of the previous HPCA reports, and the 2026 Annual Inspection Report of Ash Ponds 1N and 1S. The following sections provide a description of regulatory requirements, physical, and operational features of the ponds. Based on the results of the analyses provided in this report, Ponds 1N and 1S are classified as a Class 2 CCR surface impoundment because their failure would not result in probable loss of life but could result in potential economic and environmental damage.

2.0 REGULATION REQUIREMENTS

The hazardous potential classifications considered include Class 1 or Class 2 under the state regulation as follows:

35 IAC Section 845.120

Class 1 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.

The following sections provide a description of physical and operational features of Ash Ponds 1N and 1S followed by an evaluation of potential failure scenarios that show the Ash Ponds 1N and 1S are a Class 2 or Significant Hazard CCR surface impoundment.

3.0 SITE DESCRIPTION

Ponds 1N and 1S are located at Will County Station, 529 East 135th Street in Romeoville, Will County, Illinois and situated south of 135th Street between the Des Plaines River and the Chicago Sanity and Ship Canal. The Station was shut down in June 2022.

Basic information for the ponds is provided in Table 1. The ponds are of similar construction, size, and age. Each pond is constructed with a concrete weir spillway along the west half. Gravel access roads are located along the sides of the ponds.

Table 1: Ash Pond Construction

Pond ID	Year of Original Construction	Dimension (ft x ft)	Depth (ft)	Capacity (ft^3)	Status
Pond 1N	1977	167 x 333	7	520,000	Inactive
Pond 1S	1977	300 x 195	7	460,000	Inactive

Ponds 1N and 1S are CCR surface impoundments that only receive precipitation and stormwater through runoff. Placement of CCRs into 1N and 1S ceased in 2010 and placement of process water ceased in 2022. CEC inspected Ponds 1N and 1S on September 17, 2026, and at the time of our inspection, both 1N and 1S were full of CCR.

4.0 HAZARD CLASSIFICATION ASSESSMENT

Our annual inspection showed no physical modifications to Ponds 1N and 1S or to the surrounding area and no distress that would affect the operation and/or stability. No physical modifications or operational concerns were observed or reported that would change the results of the initial HPCA.

Based on results of the annual inspection, review of the previous HPCA reports, and the analysis provided in this report, Ponds 1N and 1S remains classified as a Class 2 CCR surface impoundment in accordance with the state regulation. Failure of Ponds 1N and 1S would not result in probable loss of life but could result in impacts to the Des Plaines River creating potential economic loss, environmental damage, disruption of lifeline facilities, or impact other concerns. Potential economic loss, environmental damage, disruption of lifeline facilities, and impact other concerns are also considered under these classifications.

5.0 LIMITATIONS AND CERTIFICATIONS

This annual HPCA report has been prepared pursuant to the CCR rule codified in 35 IAC Section 845.440 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 14, 2026

Illinois Professional Engineer No.: 062-051317

Expiration Date: November 30, 2027