

ANNUAL HAZARD POTENTIAL CLASSIFICATION ASSESSMENT REPORT
ASH PONDS 2S AND 3S
WILL COUNTY STATION
OCTOBER 2026

This annual Hazard Potential Classification Assessment (HPCA) report has been prepared pursuant to the coal combustion residuals (CCR) rules codified in Title 35 of the Illinois Administrative Code (35 IAC) Section 845.440(a). and Title 40 of the Code of Federal Regulations (40 CFR) Section 257.73(a)(2), herein referred to as the regulations, respectively, for Ash Ponds 2S and 3S 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 Class 1 or a Class 2 under the state regulations, or as a high, significant, or low hazard surface impoundment under the federal regulations, including the basis for the determination. The site is a retired 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 2S and 3S. 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 2S and 3S are classified as a Class 2 CCR surface impoundment according to the state regulation, and a significant hazard surface impoundment according to the federal regulation, 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, or defined as high, significant, or low hazard under the federal regulation as follows:

35 IAC Section 845.120

Class 1 coal combustion residuals (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.

40 CFR Section 257.53

High hazard Potential CCR surface impoundment means a diked surface impoundment where failure or mis-operation will probably cause loss of human life.

Significant hazard 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.

Low hazard CCR surface impoundment means a diked surface impoundment where failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses. Losses are principally limited to the surface impoundments owner's property.

The following sections provide a description of physical and operational features of Ash Ponds 2S and 3S followed by an evaluation of potential failure scenarios that show the Ash Ponds 2S and 3S are a Class 2 or Significant Hazard CCR surface impoundment.

3.0 SITE DESCRIPTION

Ponds 2S and 3S 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 Sanitary and Ship Canal. Will County 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 (ft³)	Status
Pond 2S	1977	350 x 178	7	510,000	Inactive
Pond 3S	1977	234 x 322	7	530,000	Inactive

Ponds 2S and 3S are CCR surface impoundments that only receive precipitation and storm water through runoff. Placement of CCRs into 2S and 3S ceased in 2022 and 2021, respectively and placement of process water ceased in 2022. CEC inspected Ponds 2S and 3S on September 17, 2026, and at the time of our inspection, both 2S and 3S were mostly full of CCR.

4.0 HAZARD CLASSIFICATION ASSESSMENT

Our annual inspection showed no physical modifications to Ponds 2S and 3S 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 2S and 3S remain classified as a Class 2 CCR surface impoundment in accordance with the state regulation and as a significant hazard in accordance with the federal regulation. Failure of Ponds 2S and 3S 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 Title 35 IAC Section 845.440 and 40 CFR Sections 257.73(a)(2) 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