

ANNUAL INSPECTION REPORT
POWERTON STATION - FORMER ASH BASIN
JULY 2020

This Annual Inspection Report has been prepared pursuant to Title 40 of the Code of Federal Regulations (40 CFR) Part 257.83(b) for Midwest Generation, LLC (MWG) at Powerton Station (Station) in Pekin, Illinois. The purpose of this project is to perform the annual inspection of the Former Ash Basin (FAB) 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. The inspection includes:

1. Review available information regarding the status and condition of the CCR unit, including, but not limited to, files in the operating record and construction information, periodic structural stability assessments, results of inspection by a qualified person, and results of previous inspection;
2. Visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit and appurtenant structures; and
3. Visual inspection of any hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation.

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 provided by MWG, and the previous annual inspection report.
- CEC performed the annual inspection in accordance with the requirements of 40 CFR 257.83(b) including observations pertaining to the following:
 - Changes in Geometry - §257.83(b)(2)(i); Observations of changes in the geometry of the FAB since the previous annual inspection were documented.
 - Instrumentation - §257.83(b)(2)(ii); The location and type of existing instrumentation was inspected and the maximum recorded readings of each instrument since the previous annual inspection were documented from the records provided by MWG.
 - Capacity and Impounded Volume - §257.83(b)(2)(iii) through (v); 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 - §257.83(b)(2)(vi); Estimate the approximate volume of the impounded water and CCR at the time of the inspection.
- Other Changes - §257.83(b)(2)(vii); The inspection will include change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.

The FAB is an inactive surface impoundment that is scheduled for closure. Approximately 30 acres in size, the FAB does not receive bottom ash or ash slag. In 2010, the FAB was sectioned into a North Pond and South Pond to accommodate a new railroad embankment and the geometry has remained unchanged since.

On June 26, 2020, CEC inspected the North and South FAB. Our observations showed no signs of distress that would suggest the stability or operation of the impounding structure is compromised.

1.0 CHANGES IN GEOMETRY - §257.83(b)(2)(i)

At the time of inspection, the FAB geometry was observed to be unchanged since the July 2019 inspection.

2.0 INSTRUMENTATION - §257.83(b)(2)(ii)

Instrumentation associated with the hydraulic structures, impoundment embankments, and/or slope performance do not exist.

3.0 CAPACITY AND IMPOUNDED VOLUME - §257.83(b)(2)(iii) through (v)

Capacity and impounded volume of the FAB and estimated depth of impounded water and CCR are represented in Table 1, attached. The volume of CCR remains unchanged from the previous investigation. FAB water volume fluctuates with the groundwater table and the surface water elevation of the nearby Illinois River. Volumes and depths were determined by reviewing inspection reports and construction drawings.

4.0 STRUCTURAL/OPERATIONAL OBSERVATIONS - §257.83(b)(2)(vi)

CEC inspected the basin for signs of distress that would have the potential to disrupt operation and safety of the FAB. Both the North and South Ponds are partially incised minimizing the potential of a release of CCR from the FAB. CCR is primarily located within the incised area of both ponds. Our observations showed minor signs of distress however, none of which currently suggest the safety, stability, or operation of the impounding structure is compromised. The items noted during the inspection included minor erosion, an animal borrow, and vegetation, again, none of which

suggest the safety, stability, or operation of the impounding structure is compromised. Based on the extent of these findings, there are no corrective actions or remedy required.

5.0 OTHER CHANGES - §257.83(b)(2)(vii)

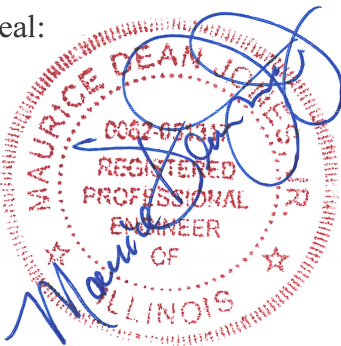
CEC inspected the basin for signs of other changes or distress that would have the potential to disrupt operation and safety of the basin. Our inspection showed no distresses that would affect the operation and/or stability of the FAB.

6.0 LIMITATIONS AND CERTIFICATION

This Annual Inspection Report was prepared to meet the requirements of §257.83(b) 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: Maurice Dean Jones
Name: M. Dean Jones, P.E.
Date of Certification: July 10, 2020
Illinois Professional Engineer No.: 062-051317
Expiration Date: November 30, 2021

Table 1: Inspection Summary - Former Ash Basin

| Category | Regulation Reference | Evaluation | Recommended Action |
|--|-----------------------------|--|---------------------------|
| Change in Geometry | §257.83(b)(2)(i) | None | None |
| Instrumentation | §257.83(b)(2)(ii) | None | None |
| Water Depth | §257.83(b)(2)(iii) | North Pond - 13.4 feet South Pond - 15.5 feet | None |
| CCR Depth | §257.83(b)(2)(iii) | 10 feet | None |
| Estimated Storage Capacity | §257.83(b)(2)(iv) | 500,000 CY | None |
| Impounded Water Volume | §257.83(b)(2)(v) | North Pond - 12.1 Acre Feet South Pond - 32.0 Acre Feet Ground Water Elevation 446.0 | None |
| Impounded CCR Volume | §257.83(b)(2)(v) | North Pond - 300,000 CY South Pond - 200,000 CY | None |
| Structural/Operational Observations | §257.83(b)(2)(vi) | Minor erosion, burrows, and vegetative cover | Continue to monitor |
| Other Changes | §257.83(b)(2)(vii) | None | None |